

One Earth ISH 3 Thursday 6 November- 2025

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

The following comprises a summary of the verbal representations of NSDC at ISH3 on the 6th November 2025. It is supplemented by additional comments as appropriate, where NSDC had further points to raise, but insufficient time was available within the hearings.

Draft Development Consent Order (Item 4 of the Agenda):

1. Under **Agenda Item 4 (iv)**, NSDC welcomed an approach that would see the application fees for the discharge of requirements rise with inflation, tracked to the Consumer Price Index. Notwithstanding this, NSDC reiterated their previous position that the overall level of fees for the discharge of requirements is considered to be insufficient, although a post ISH3 meeting has taken place with the Applicant to query fee levels assigned to different requirements and the justification for that.
2. Under **Agenda Item 4 (vii)** NSDC noted that a scheduled meeting was due to take place during the w/c 10th November, whereby these issues (the Draft DCO) would be discussed further within the framework of the next iteration of the Statement of Common Ground and with a view to confirming those matters that are agreed and those that are not agreed, with a view to the Applicant providing an updated position by Deadline 5 or 6.

Environmental Matters (Item 5 of the Agenda)

3. Under **Agenda Item 5 (i) Sequential and Exception Tests** NSDC noted that the agenda items around the Sequential and Exception tests appeared to be the same points as posed in the Second Written Questions. As such, NSDC confirmed at ISH3, that they had nothing further to add at this point, beyond our response to the Second Written Questions, but that we would undertake a review of the Applicant further submissions at D4 and make any further final written comments as part of this written summary of ISH3.
4. NSDC have now done this and consider there are no new points to add, beyond our previous responses to the Second Written Questions at D4 (REP4-056).

Landscape and Visual Amenity (Item 7 of the Agenda)

5. Under **Item 7 (i)** NSDC confirmed that based on further discussions undertaken with the Applicant, NSDC were now broadly satisfied on the suitability of the assessment, however we do not necessarily agree with the assessment findings (refer to Agenda Item 8).

Cumulative Effects (Item 8 of the Agenda)

6. Under **Agenda Item 8(i)**. NSDC confirmed that they had considered the Interproject Effects Report and are broadly content that the most important schemes (Major projects and NSIPs and TCPA applications) had now been considered and assessed, although there was one outstanding query in respect of a Solar Farm application within the District that NSDC will be speaking to the Applicant direct about.
7. Under **Agenda Item 8(ii)** NSDC confirmed that they did not agree with the findings of the cumulative assessment, in respect of Landscape and Visual and BMV. As such, in respect of landscape and visual effects, our concerns remain regarding the wider impacts on landscape character and the significant change in land use from NSIP projects within our district and that of neighbouring authorities. NSDC noted that the additional work on cumulative effects undertaken, did not change our position on the potential for adverse effects from a cumulative perspective.
8. NSDC referred to the position presented at ISH2 and other responses made within the examination. The following was stated at ISH2:

‘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.

We also disagree with the findings of the Joint Interrelationships Report from the Tillbridge examination (as previously referenced by the applicant) as visual effects within this report 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 appropriately consider landscape effects through extensive land use change, or perceptual changes through the introduction of above-ground built elements.’

9. It was noted at ISH3, that NSDC (and the other applicable councils) did not have the benefit of representation from AAH landscape consultants, but in response to the ExA’s request for clarification from NSDC (and the other authorities represented by AAH) on our views on the

approach to assessing cumulative landscape and visual effects, we enclose with this submission a Technical Memorandum (TM07) dated 10 November 2025 as prepared by NSDC's external advisors on landscape and visual matters.

10. In relation to the issue of BMV, we explained that we also remain concerned on the impact of BMV land loss at a district level and note that the Applicant continues to focus (within the Inter Project Effects report and other representations) on the 'Top Down' approach, namely presenting the loss as a percentage proportion of total BMV land at the county level.
11. In respect of the impact at the district level, NSDC note that the Applicant provided further information regarding the loss of BMV land on page 15 of their Written Summary of the Applicant's Oral Submissions at ISH2. This was presented in that document as Table 5.1 Breakdown on Agricultural Loss at a District Level and is copied below for context.

District	West Lindsey (ha)	Bassetlaw (ha)	Newark and Sherwood (ha)
All Other NSIPS			
Grade 1	0	0	0
Grade 2	9.2	23.2	0
Grade 3a	248.44	632.22	1536.8
Grade 3b	1420.3	2034.01	1667.38
Grade 4	137.8	8.4	51
Grade 5 / Non Agric	77	15.34	0
All Other NSIP BMV	257.64	655.42	1536.8
All Other NSIP Total	1892.74	2713.17	3255.18
Applicant Surveyed Land			
Grade 2	45	139	65
Grade 3a	83	191	136
Grade 3b	66	329	184
Applicant Surveyed BMV	128	330	201
Applicant Surveyed Total	194	659	385
Cumulative BMV	451.64	985.42	1737.8
Cumulative Total Area	2086.74	3372.17	3640.18

12. The first point to note from the above data provided by the Applicant is that the breakdown only captures NSIP projects and does not provide further information in respect of TCPA applications within the NSDC area. As such, it is incomplete in informing a clear picture of BMV loss within the district and as such, cannot be relied upon, in providing an understanding of the total cumulative loss of BMV land at a district level.
13. It is clear from the above data that NSDC has the greatest amount of BMV loss of land, from NSIP projects alone with a loss of 1737.8ha. Bassetlaw and West Lindsey, have a total loss of

985.42ha and 451.64ha respectively and therefore, even their combined losses are significantly under the cumulative loss of BMV land within the NSDC district.

14. This data as presented by the Applicant reaffirms the concerns of NSDC on the cumulative loss of BMV land and the consequence of removing such land from productive agricultural use and the cumulative loss of BMV land is likely to be significantly higher once TCPA applications are taken into account.
15. Whilst NSDC notes that the Applicant argues that loss of BMV is 'temporary' associated with the operational lifespan of the proposed development, NSDC maintain that a 60 year operational lifespan establishes a degree of permanence that is equivalent to permanent loss and decreases the likelihood that such land will be returned to agricultural use at a future point.
16. NSDC maintain that the cumulative loss of BMV land at the district level is significant at the local level and remains a key concern of NSDC.