

This matter is being dealt with by:

[REDACTED]

T [REDACTED]

E [REDACTED]@nottscc.gov.uk

W nottinghamshire.gov.uk

Sent via email to

[oneearth solar@planninginspectorate.gov.uk](mailto:oneearth solar@planninginspectorate.gov.uk)

12<sup>th</sup> November 2025

Dear Sir/Madam

**ONE EARTH SOLAR FARM DEVELOPMENT CONSENT ORDER EN010159 – ACTION POINTS  
FROM ISSUE SPECIFIC HEARING 3 ON THURSDAY 6<sup>TH</sup> NOVEMBER 2025**

I write further to the Issue Specific Hearing which took place on 6<sup>th</sup> November 2025 (ISH3) and to respond to the action points for Nottinghamshire County Council (NCC) (IP FD2E7A44C).

1. NCC was asked to clarify how and why its approach to cumulative landscape and visual assessment differs from that adopted by the Applicant, and whether applying the Councils' preferred approach would lead to a different outcome in terms of the scale and significance of cumulative effects.

A **technical memorandum** is appended to this letter to provide further clarification on this issue.

2. NCC was asked to supply the relevant section of its highway policy regarding Road Safety Audits.

I **attach** Part 1.2 of the Nottinghamshire Highway Design Guide (HDG) which became adopted council policy on 13th January 2021. As stated in our response to the Examining Authority's Written Questions 2 (ExQ2) dated 13<sup>th</sup> October 2025, Paragraph 1.2.3 of Part 1.2 of the Nottinghamshire HDG states that new accesses or the increased use of existing accesses on classified or unclassified roads will normally be supported where there is not a road safety problem or where a road safety problem can be removed. Accordingly, NCC believes that the appropriate way to determine the safety of an access is through the Road Safety Audit process.

3. NCC was asked to clarify its position with regards to cumulative impacts on traffic from this proposal and others, and whether it considers there to be a significant cumulative impact.

We are aware that the Applicant has produced a document which summarises the inter-project effects with surrounding NSIPs which was submitted at Deadline 4. We agree with the conclusion of the report that any traffic impact relating to this scheme can be managed through appropriate measures prescribed within the CEMP/CTMP. We therefore do not disagree with the principle that no significant cumulative effects are predicted in relation to traffic and access. NCC is continuing to discuss the detail of the Outline CTMP to ensure the mitigation measures are robust.

I trust that these comments are of assistance. For clarification over our position on any other matters, please refer to the draft Statement of Common Ground submitted by the Applicant at Deadline 5.

Yours faithfully,

[REDACTED]

Planning and Infrastructure Manager  
Nottinghamshire County Council

# Technical Memorandum on Landscape Character Assessment and Cumulative Effects

## Introduction

This Technical Memorandum (TM) has been prepared in response to the Examining Authority's request at Issue Specific Hearing (ISH) 3 for further clarification on how and why the Councils' approach to cumulative landscape and visual assessment differs from that adopted by the Applicant, and whether applying the Councils' preferred approach would lead to a different outcome in terms of the scale and significance of cumulative effects.

While there is broad agreement between the Councils and the Applicant on other landscape matters, which is captured within the Statement of Common Ground (SoCG), the approach to the assessment of cumulative landscape and visual effects remains an area of disagreement. The Applicant's approach, based on individual landscape character areas (from local to national scale) with reference to the Interrelationship Report used for the Tillbridge Solar Farm assessment, is too restrictive when considering the widespread change the region is undergoing through the development of large scale solar, BESS and energy infrastructure.

As identified in previous correspondence including: Relevant Representations, Local Impact Reports (LIR), responses to ExQs, evidence provided at ISHs, and subsequent ISH summary text; by reason of its mass and scale, we judge that the proposed development would lead to Significant Adverse effects upon the existing landscape and visual baseline. When considered cumulatively, we consider that the approach utilised within the applicants LVIA of isolating landscape character areas and not fully considering sequential views of multiple schemes, underplays the progressive landscape change occurring across the region, and does not adequately capture how multiple schemes collectively influence the perceived character, openness and rural qualities of the Trent Valley landscape.

The position of adverse cumulative landscape and sequential visual effects of several NSIP scale solar developments was also adopted by Lincolnshire County Council on the Tillbridge Solar Project, and the *Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero, 14 July 2025* agreed with this argument (refer section 3.7.145. of this document), establishing this principle.

## Cumulative Landscape Effects

The cumulative landscape effects of the proposed development would result in significant adverse effects when considered alongside other large-scale renewable energy projects in the region.

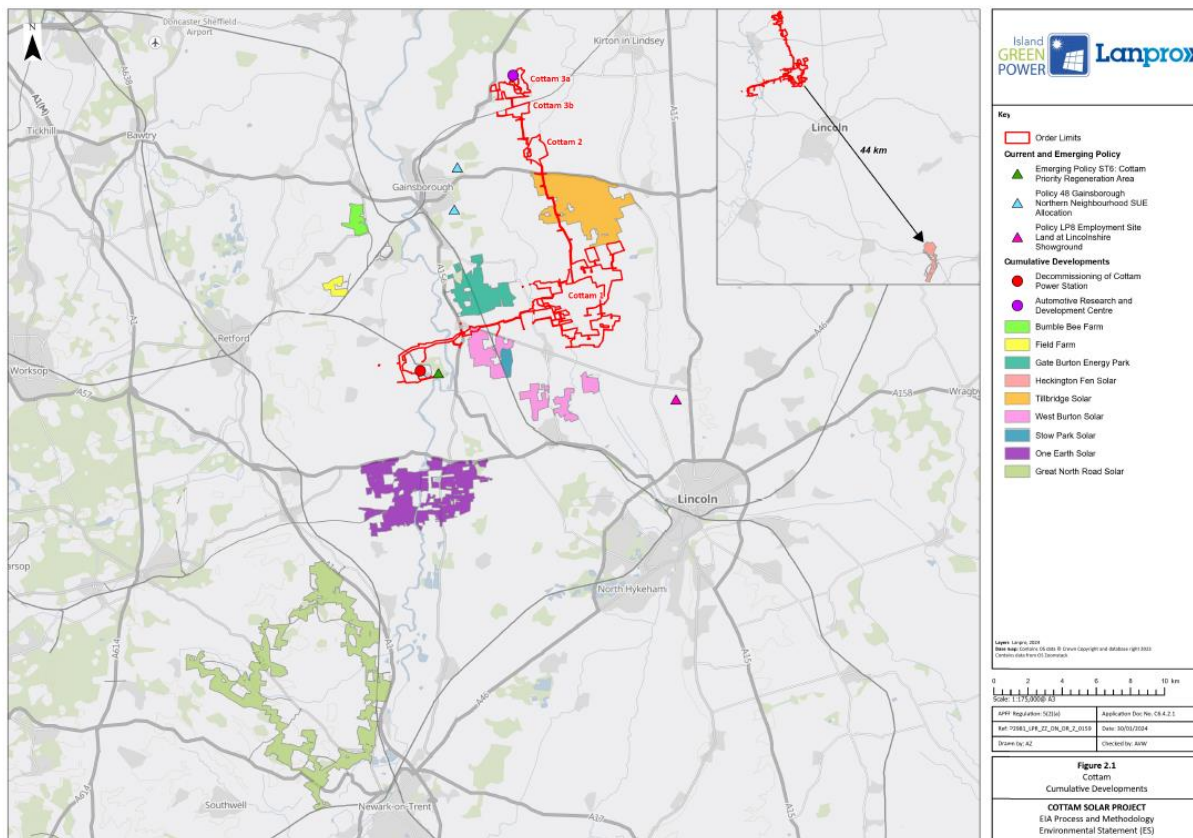
While some adjacent schemes identified in the ES may be individually smaller, the mass and collective scale of these projects across the Trent Valley and adjoining areas presents a concern. The combined extent of energy infrastructure development would:

- Adversely affect multiple published character areas across Lincolnshire and Nottinghamshire;
- Lead to the progressive alteration of the regional landscape character from predominantly agricultural to one that contains energy-infrastructure which we judge would become a key feature; and
- Result in an extensive area of land-use change, from agriculture to solar, and loss of perceived rural openness and tranquility.

Over time, the cumulative impact would alter the character of the region, creating an emergent landscape type with energy infrastructure being a key feature, rather than its historic agricultural character.

While we must consider the effect One Earth Solar scheme will have in addition to these other schemes, rather than all the schemes together, when considering cumulative landscape character effects, we judge these will result in adverse effects, predominantly through an extensive change in land-use.

This is particularly a concern when considered cumulatively alongside schemes in close proximity, as illustrated on the *Cottam Cumulative Developments* (Fig. 2.1) which was included within *Appendix E Cottam Solar Technical Note on Cumulative Effects of the One Earth Solar Farm Written Summary of Applicant's Oral Submission at the Issue Specific Hearing 1 (ISH1)* [REP1-077] which was displayed and discussed at the One Earth Solar ISH2. Excerpt below demonstrating not only the number of developments in this landscape, but also the scale and extent of land use change:



Therefore, considering the One Earth Solar scheme cumulatively alongside those presented on *Figure 2.1 Cottam Cumulative Developments*, we judge these landscape effects would be at least Moderate adverse (based upon the applicants LVIA Methodology) and therefore significant, with the scheme adding additional above ground development, extending the area of land use change, and also acting as a bridge between the Great North Road Solar scheme and those to the north (West Burton, Cottam, etc.) creating an extensive and vast swathe of solar development along the river valley.

## Cumulative Visual Effects

The scale and extent of development would also lead to adverse effects on views from visual receptors when considered alongside other large-scale renewable energy projects in the region, changing from views experienced within an agricultural or rural landscape to that of a landscape containing large scale solar development.

We maintain a concern regarding sequential cumulative visual effects, as identified and raised in previous correspondence. Although, individual schemes may be separated by some distance, the repeated presence of large-scale solar arrays along routes travelled by the public would:

- Increase the susceptibility of receptors to change due to visual fatigue;
- Create a progressive perception of landscape Industrialisation; and
- Erode the sense of rural character and tranquility across the wider area.

GLVIA3 (Table 7.1) defines sequential cumulative visual effects as those *that 'occur 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'*.

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We consider that sequential effects would be experienced along multiple Public Rights of Way (PRoW) where the Applicant's LVIA already identifies significant adverse visual effects at Year 15. Users of these routes, who tend to move slowly and engage attentively with their surroundings would likely encounter successive views of solar infrastructure across several kilometers, even after mitigation has matured. When combined with road corridors such as the A1133 and A156, and associated lanes, these routes create a coherent visual narrative of a rural landscape increasingly defined by energy infrastructure.

These sequential cumulative visual effects are more likely to be experienced alongside the schemes in closer proximity to the One Earth Solar scheme. Therefore, considering the One Earth Solar scheme cumulatively alongside those presented on *Figure 2.1 Cottam Cumulative Developments*, we judge these cumulative sequential effects would be at the most Minor to Moderate adverse (based upon the applicants LVIA Methodology) and therefore not-significant.

# Road Network Policy

## Part 1.2

### 1.2.1 Principles of access to the highway network

To facilitate new development, the County Council supports the need for limited improvements to 'A' and 'B' class roads, whether; to improve or extend existing capacity, to provide new links, or to address clearly identified significant strategic or local needs. In assessing proposals that would increase traffic, and/or provide new streets and junctions, the following criteria should be considered:

- the contribution to sustainable development and regeneration including improved connectivity,
- how conditions for pedestrians, cyclists, public transport users, freight and residents can be improved,
- how safety for all is improved,
- the extent of any additional traffic and any effects it may have on the locality, and the extent to which congestion can be reduced, and
- how a net benefit to the environment can be provided.

1.2.2 Proposals should show, overall, a net benefit across these criteria when taken as a whole. All proposals must show how any dis-benefits will be mitigated.

1.2.3 New accesses for vehicles and the increased use of existing accesses on other classified and unclassified roads will normally be supported where:

- the needs of pedestrians, cyclists, public transport users, freight and residents can be addressed,
- there is not a road safety problem or where a road safety problem can be removed, and
- the route is suitable or can be suitably upgraded to carry the additional traffic and type of traffic from the development.

1.2.4 If access to a development can be gained off a minor or side street, you should normally consider this option as preferable (with improvements to the junction of the minor side street with the main road as necessary).

1.2.5 The design and construction of works on classified roads and other roads (existing or proposed) not covered by this design guide must normally comply with the 'Design Manual for Roads and Bridges' published by Her Majesty's Stationary Office.

### 1.2.6 Need for Transport Assessments, Transport Statements, and Travel Plans

The National Planning Policy Framework 2024 (NPPF) covers the current national policy for promoting sustainable transport.

NPPF states that:

*“Planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities”.*

1.2.7 The preparation of a Transport Assessment in support of a proposed development is identified as a key document in encouraging the use of more sustainable modes of transport. The NPPF goes on to say:

*“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored” ;*

1.2.8 Government guidance on the preparation of Transport Assessments, Transport Statements, and Travel Plans is provided in Planning Practice Guidance (PPG) ‘Transport evidence bases in plan making and decision taking’. The PPG states that

*“Where the transport impacts of development are not significant, it may be that no Transport Assessment or Statement or Travel Plan is required. Local planning authorities, developers, relevant transport authorities, and neighbourhood planning organisations should agree what evaluation is needed in each instance”.*

1.2.9 The ‘Guidance on Transport Assessment’ (GTA) (DfT, March 2007) was archived in October 2014. However, in lieu of any detailed replacement guidance being published, the County Council requires Transport Assessments and Statements to be prepared in accordance with the PPG and GTA, particularly where significant changes in traffic may occur.

1.2.10 In general, the County Council will seek a Transport Statement, or a Transport Assessment and Travel Plan based on the following thresholds. These equate to development scenarios which would typically generate greater than 30 two-way peak hour vehicle trips. This threshold will also be used to establish the scope of the assessment in terms of main junctions to be included. However, there may be specific circumstances where the threshold requires adjustment both upwards and downwards. The scope of a Transport Assessment should therefore be agreed at an early stage. Lorry movements should be converted to Passenger Car Units (PCU) if likely to be material.

1.2.11 Where a proposed development meets the below thresholds but a change of use or change in access arrangements would not represent a material change in the level of traffic generation, the submission of a Technical Note may be sufficient in support of a planning application.

**Table 1.2**

<b>Land use</b>	<b>Use/description of development</b>	<b>No assessment</b>	<b>Transport Statement</b>	<b>Transport Assessment and Travel Plan</b>
Food retail	Retail sale of food goods to the public – food superstores, supermarkets, convenience food stores.	<250sq.m	>250<800sq.m	>800sq.m
Non-food retail	Retail sale of non-food goods to the public; but includes sandwich bars – sandwiches or other cold food purchased and consumed off the premises, internet cafés.	<800sq.m	>800<1,500sq.m	>1,500sq.m
Dwelling houses	Dwellings for individuals, families of up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems	<50 units	>50<80 units	>80 units
Business	(a) Offices other than in use within Class A2 (financial and professional services) (b) research and development – laboratories, studios (c) light industry	<1,500sq.m	>1,500<2,500sq.m	>2,500sq.m
General industrial	General industry (other than classified as in B1).The former 'special industrial' use classes, B3 – B7, are now all encompassed in the B2 use class.	<2,500sq.m	>2,500<4,000sq.m	>4,000sq.m
Storage or distribution	Storage or distribution centres – wholesale warehouses, distribution centres and repositories.	<3,000sq.m	>3,000< 5,000sq.m	>5,000sq.m

Land use	Use/description of development	No assessment	Transport Statement	Transport Assessment and Travel Plan
Mixed Development/Sui Generis	Sui generis - For example: petrol filling stations, vehicle hire, vehicle sales, builders' yard, garden centre, scrap yard, waste disposal.	Discuss with highway authority		
Financial and professional services	Financial services – banks, building societies and bureaux de change, professional services (other than health or medical services) – estate agents and employment agencies, other services – betting shops, principally where services are provided to visiting members of the public.	<1,000sq.m	>1,000<2,500sq.m	>2,500sq.m
Restaurants and cafes	Restaurants and cafés – use for the sale of food for consumption on the premises, including internet cafés.	<300sq.m	>300<2,500sq.m	>2,500sq.m
Drinking establishments	Use as a public house, wine-bar or other drinking establishment.	<300sq.m	>300<600sq.m	>600sq.m
Hot food takeaways	Use for the sale of hot food for consumption on or off the premises.	<250sq.m	>250<500sq.m	>500sq.m
Drive-thru restaurants and coffee shops	Use for the sale of food and drink for collection in a vehicle and consumption off the premises			In all cases



Land use	Use/description of development	No assessment	Transport Statement	Transport Assessment and Travel Plan
Hotels	Hotels, boarding houses and guest houses, development falls within this class if 'no significant element of care is provided'.	<75 bedrooms	>75<100 bedrooms	>100 bedrooms
Residential institutions- hospitals, nursing homes	Used for the provision of residential accommodation and care to people in need of care.	<30 beds	>30<50beds	>50 beds
Residential institutions - residential education	Boarding schools and training centres.	<50 students	>50<150 students	>150students
Residential institutions - hostels	Homeless shelters, accommodation for people with learning difficulties and people on probation.	<250 residents	>250<400 residents	>400 residents
Non-residential institution	Medical and health services – clinics and health centres, crèches, day nurseries, day centres, consulting rooms (not attached to the consultant's or doctor's house), museums, public libraries, art galleries, exhibition halls, training centres, places of worship, religious instruction and church halls.	<500sq.m	>500<1,000sq.m	>1,000sq.m
Schools	Primary and secondary schools with or without a nursery.	See Part 4.3 New Schools & School Extensions		

Land use	Use/description of development	No assessment	Transport Statement	Transport Assessment and Travel Plan
Assembly and leisure	Cinemas, dance and concert halls, sports halls, swimming baths, skating rinks, gymnasiums, bingo halls and casinos, other indoor and outdoor sports and leisure uses not involving motorised vehicles or firearms.	<500sq.m	>500sq.m<1,500sq.m	>1,500sq.m

### 1.2.12 Highway Adoption

We will encourage developers to create residential street layouts that are to an adoptable standard and that will be offered for adoption to protect residents' interests. We will not normally adopt access to developments of five or less dwellings. We will discourage the use of private streets serving in excess of five dwellings and will consider whether the use of the Advanced Payment Code, Highways Act 1980 is appropriate to secure adoption in each case. In exceptional circumstances we may consider private streets serving more than five dwellings subject to the County Council being indemnified from the cost of making-up streets and private maintenance arrangements being put in place.

1.2.13 For employment and commercial developments, we will not normally seek to adopt road layouts purely of an industrial or commercial nature unless a through route with wider strategic transport benefits.

[End]