



Great North Road Solar and Biodiversity Park

Environmental Statement

Volume 4 – Technical Appendices

Technical Appendix A3.3 – Other Comments On EIA Scoping Report

Document reference – EN010162/APP/6.4.3.3

Revision number 1

June 2025

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, APFP Regulation 5(2)(a)

This matter is being dealt with by:



Planning ref:
23/01990/CONSUL
Consultation received:
22/11/23

Director of Growth and Regeneration
Newark and Sherwood District Council
Castle House
Great North Road
Newark
NG24 1BY

11 December 2023

Dear

PROPOSAL: Development Consent for the Great North Road Solar Park - Scoping Consultation To view the documents, please follow the link:
<https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/great-north-road-solar-park/>

LOCATION: Great North Road Solar Park,

Nottinghamshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the pre-app advice application which was received on the 22 Nov 2023.

As no specific information has been submitted with regards to drainage for this pre-app enquiry, we have made some general comments on the information that we would expect see when the application is submitted for planning approval.

Given the proposed scale of the development to satisfy the National Planning Policy Framework (NPPF) further details would need to be submitted to support this application. Paragraph 163 fn.50 of the NPPF requires that applications in Flood Zone 2, 3 and in Flood Zone 1 over 1 hectare should be accompanied by a site-specific flood risk assessment, reviewing the potential flood risks to the development from all sources. An FRA is vital if the local planning authority is to make an informed planning decision.

As LLFA we also require details of the proposed surface water drainage strategy for the development. Paragraph 165 of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The LLFA expect that any proposed drainage strategy is in accordance with CIRIA C753 and current best practice guidance. Any FRA or drainage strategy should include following information:

- An assessment of the nature of SuDS proposed to be used and demonstration that design is in accordance with CIRIA C753 and NPPF Paragraph 169.
- Details of a proven outfall from site in accordance with the drainage hierarchy. The following options should be considered in order of preference:
 - Infiltration
 - Discharge to watercourse
 - Discharge to surface water sewer

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Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

- Discharge to combined sewer
- Justification for the use or not of infiltration, including the results of soakaway testing, in accordance with BRE 365.
- Evidence the maximum discharge is set to the QBar Greenfield run-off rate for the positively drained area of development.
- Demonstrate the site drainage system should cater for all rainfall events up to and including the 1 in 100-year event including a 40% allowance for climate change.
- Provide details for exceedance flows; surface water should be contained within the site boundary without flooding any properties in a 1 in 100 year plus 40% climate change storm.
- Evidence to demonstrate the viability (e.g Condition, Capacity and positive onward connection) of any receiving watercourse to accept and convey all surface water from the site.
- Details of STW approval for connections to existing network and any adoption of site drainage infrastructure.
- Evidence of approval for drainage infrastructure crossing third party land where applicable.
- A surface water management plan demonstrating how surface water flows will be managed during construction to ensure no increase in flood risk off site.
- Evidence of how the on-site surface water drainage systems shall be maintained and managed after completion and for the lifetime of the development to ensure long term effectiveness, and the party responsible for this.

This is only a brief outline of the minimum information we would be expecting to see and not an exhaustive list.

Informative

1. SuDS involve a range of techniques and SuDS methods can be implemented on all sites. SuDS are a requirement for all major development as set out within paragraph 165 of the NPPF.
2. The LLFA does not consider oversized pipes or box culverts as sustainable drainage. Should infiltration not be feasible at the site, alternative sustainable drainage should be used, with a preference for above ground solutions.
3. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management. Sustainable Drainage Systems (SuDS) are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on-site as opposed to traditional drainage approaches which involve piping water off-site as quickly as possible.

Yours sincerely



Principal Flood Risk Management Officer
Nottinghamshire County Council
Please ensure any consultations are sent to flood.team@nottscc.gov.uk

TOWN AND COUNTRY PLANNING ACT

HIGHWAY REPORT ON PROPOSALS FOR DEVELOPMENT

DISTRICT: Newark

Date received 22/11/2023

OFFICER: [REDACTED]

PROPOSAL: Development Consent for the Great North Road Solar Park - Scoping Consultation To view the documents, please follow the link: <https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/great-north-road-solar-park/>

D.C. No. N/23/01990/CONSUL

LOCATION: Great North Road Solar Park

APPLICANT: Elements Green Trent Ltd

The approach of the scope set out appears to be in accordance with DMRB and DfT Guidance so the principle appears acceptable.

Specific details of the Transport Assessment should be agreed with the Highway Authority at a later date.

Please note that we are a direct consultee for this proposal so further formal consultation from the District Council will not be necessary (but we will be happy to make such consultation responses available if requested).

[REDACTED]
Principal Officer – Highway Development Control

11th December 2023

Great North Road Solar Park – Historic Environment Comments Newark & Sherwood District Council

The Environmental Impact Assessment scoping report for the Great North Road solar Park sets out the proposed approach regarding cultural heritage and archaeology at Chapter 8.

We appreciate the early consultation as stated in section 8.2 and would also add that the County Archaeologist for Nottinghamshire (Nottinghamshire County Council) was also present in the consultation meeting.

The scoping report recognises the extensive and diverse range for archaeological remains within the site boundary (Section 8.3.2) and acknowledges the potential for direct and damaging impacts from the proposed development (Section 8.4).

The scoping report makes provision for a full desk-based assessment (DBA), geophysical survey of the full site boundary and a programme of evaluation trenching to be completed as part of the application process and to inform the Environmental Statement (ES) chapter of the Development Consent Order (DCO) application. This is an appropriate and reassuring approach.

The scope of evaluation trenching has not been stated; however, this should include a programme that covers the full impact zone within the Order Limits and the connection cable route corridor.

Sections 8.4.4 seeks to scope out impacts from the operational phase. We would advise that there is a significant potential for impacts associated with site maintenance and redevelopment during the operational life of the solar park. Many older solar sites are currently undergoing 'midlife' redevelopment, including complete removal of panel infrastructure and highly intrusive groundworks. For areas where preservation *in-situ* is preferred, measures will need to be implemented in the OEMP to ensure there is no impact to the archaeological resource during any operational site works. Anticipated impacts during the operational life of the solar farm will need considered as part of the application process.

Section 8.4.5 seeks to descope the decommissioning phase on the basis that all impacts will have been addressed by the construction phase. We would recommend that decommissioning is considered at the application phase and mitigation measures agreed and implemented prior to construction work commencing.

In conclusion, we are broadly supportive of the approach presented, although the details regarding the scope of evaluation trenching will need to be agreed as soon as possible. This should cover the full site impact zone to ensure there is a sufficient level of understanding of the site-specific archaeological potential for the ES chapter. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

From: [Weston Parish Council](#)
To: [Great North Road Solar](#)
Subject: Weston Parish Council comments Solar Farm in Newark & Sherwood Notts
Date: 08 December 2023 08:10:45

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Please find comments from Councillors of the Weston Parish Council. We appreciate these comments are sent in late however, we are a small parish and only lately connected to the other villages considering the Solar Farm more collectively.

I had requested a public meeting for our villagers to hear about the proposals, but no one responded to my email. And for such a huge scheme the consultation period has not worked to allow us to arrange meetings and it has felt rushed by all concerned.

Comments from individual Councillors (1 abstained):

"Environmental impact assessment scoping - Great North Road Solar Park

The proposed solar park is excessive and would take up too much valuable productive land

and should be rejected or vastly scaled down.

Massive economic loss from land production which will result in huge import costs to counteract loss.

The change of land use from arable soils to grazing land will have a detrimental effect on the

land and will take a long time to get back to fertile land again after the 40 year period.

Land

use report from Keron Countryside Consultants Limited not available with the environmental

impact assessment scoping report discussing loss of Grade 1 to 5 high productive land over

the proposed Solar Park scheme.

Potential desecration/destruction of buried architectural remains and or artefacts etc during

the construction phase.

Disruption to walkers and horse riders to footpaths and bridleways during construction phase. Nine footpaths and one bridleway will be affected.

Massive increase of heavy goods vehicle traffic around the narrow country lanes with a potential increase of air pollution.

Proposed solar park would have a massive impact on the flora and fauna in the area during

construction phase

Proposed solar park would have a massive negative impact to the birds and animals occupying the land during the construction phase. Deer, badgers, foxes, native birds etc will

lose their territory and freedom to roam and forage during construction and land occupancy.

Will new fences need to be erected which could prevent movement of animals.

Confirm No new pylons be erected as part of the Solar park scheme, no negative visual impact.

Confirm all cabling associated with the proposed solar scheme will be underground in the fields to Staythorpe Power Station.

Parts of Moorhouse beck are not managed properly and regularly floods on part of the land

in the proposed scheme around Weston"

I am sure we will have the opportunity to comment further along the line. But would like these comments registered.

Kindest regards,

[REDACTED]

[REDACTED]

Clerk to Weston Parish Council

Mobile: [REDACTED]

This matter is being dealt with by:

Reference:

T

E planning.policy@nottscc.gov.uk

W nottinghamshire.gov.uk



**Nottinghamshire
County Council**

The Planning Inspectorate
Environment Services Operations Group 3

Sent by email to
GreatNorthRoadSolarProject@planninginspectorate.gov.uk

7th December 2023

Dear Sir

GREAT NORTH ROAD SOLAR PROJECT SCOPING CONSULTATION AND NOTIFICATION

I am writing to respond to your letter of 9 November concerning the above.
Nottinghamshire County Council is responding to the Scoping Report as follows:

Ecology

The County Council is generally satisfied with the proposed scope of survey and assessment as set out in the Scoping Report (specifically Chapter 6, Ecology, Ornithology and Biodiversity). However, I have the following observations:

For some reason, the Scoping Report hasn't detailed the Local Wildlife Sites occurring within 2km of the order limits, but it does note in section 6.3.1 that 31 such sites occur and that these will be presented in the PEIR and ES. The County Council would like to underline the importance of Local Wildlife Sites, which are of county-level importance for wildlife, and which are a key receptor when considering the potential impacts of this scheme.

The Council notes that survey work will take place across three seasons – 2022, 2023 and 2024. It is important that surveys are up to date, and the applicant should have regard to CIEEM's Advice Note on the lifespan of ecological reports and surveys (CIEEM, April 2019). Any deviations from what is set out in this Advice Note will need to be justified.

Regarding bats and potential impacts on this group, the applicant's attention should be drawn to recent research about the impact of solar PV sites on bats –Tinsley, E., Froidevaux, J. S. P., Zsebők, S., Szabadi, K. L., & Jones, G. (2023). Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology*, 60, 1752–1762. <https://doi.org/10.1111/1365-2664.14474>.

Local Flood matters

Section 7 of the document is noted. The promoters appear to follow all the relevant guidance and expectations. Notwithstanding the information contained in the submitted document, the County Council advises that wording such as 'the development must not increase the risk of flooding to the surrounding area' should be contained in the assessment.

Heritage and Archaeology

The scoping opinion identifies that NSDC archaeological advisors and conservation officers (historic buildings) having been consulted. We would request that Heritage and Archaeological Officers at the County Council should also be involved in the scope of proposed archaeological trenching etc as work has already been undertaken in respect of other Solar Projects in the Trent Valley within Lincolnshire Archaeology which ought to be mirrored.

The statement in para 3.1.6 concerning impacts on heritage assets beyond the study area, is considered premature since there is no LVIA ZTV with heritage receptors at this point to justify a statement of this nature. This does not follow the government guidance provided in EN 2 and EN 3.

The Great North Solar Park covers a significant area of central Notts, north of Newark, an area which is regionally significant for its density of cropmarks. These were recorded in the 1980's as part of the then English Heritage funded National Mapping Programme (NMP). We have this on our Historic Environment Record, but it is HE copyright. The promoters should obtain the data from HE, because without it they will inevitably underestimate the archaeological potential of the sands and gravels of the Trent Floodplain. The amount of visible archaeology decreases to the west of the area as the various areas proposed for solar arrays move up onto the Mercia mudstones, but successive recent archaeological evaluations in the area have revealed similar densities of archaeology, some highly significant. "Aggregates and Archaeology in Nottinghamshire" (Knight and Spence, 2013) identified that there were at least 7.34 archaeological sites per km² on the sands and gravels, a figure which is now well out of date and consequently a present day recalculation would be considerably higher.

The work to be undertaken will likely involve Lidar survey. For a scheme of such a scale it might be worth commissioning new, high accuracy Lidar.

2.5.1.1. No mention is made of archaeological investigation or mitigation in regard to the presumed impacts of the installation of the solar arrays. This is clearly incorrect.

The same point can be made for sections 2.5.1.4, 5, and 6.

Section 8.2 makes it clear that the County Council has not been consulted on the development so far. This oversight needs to be rectified so that both the archaeological advisor to N&SDC and the Nottinghamshire Archaeologist are fully involved in developing an appropriate approach to the archaeological investigations and mitigation.

At section 8.4.5 it is proposed to scope out archaeological issues under consideration of decommissioning the scheme. This needs to be scoped in. There are almost certainly going to be areas where archaeological sites will need to be preserved in situ, potentially

under array solutions that avoid ground disturbance. Decommissioning has the potential to be as destructive to archaeological remains as the original construction phase will be.

The summarised description of the archaeological potential of the proposal makes it clear that there is considerable potential for earlier prehistoric remains (including the internationally significant Late Upper Palaeolithic site to the South of the scheme at Farndon on geology similar to much of scheme). Standard evaluation techniques of geophysical investigation and limited trial trenching will almost certainly fail to find such sites, except serendipitously, and consideration should therefore be given to undertaking programmes of fieldwalking. Metal detecting might also help to locate sites associated with prehistoric, early Mediaeval and Civil War activity. Both techniques are worth using in this landscape. It might be worth the archaeological consultants considering the advice given in Knight and Spence 2013, see p. 41.

Highways and Rights of Way

The Highway Authority (HA) has reviewed the content of the Environmental Impact Assessment (EIA) Scoping Report (SR) dated November 23 submitted on behalf of Great North Road Solar. Chapter 11 of the report determines the extent of the traffic & transportation issues to be considered. The main areas considered are broad transport aspects, with limited detail provided.

A proposal of this scale and magnitude will have significant impact on the existing transportation network during the project's construction phase. Therefore, the HA will require a detailed Transport Assessment (TA) /supporting studies to assess the additional traffic & transportation demands. These should be prepared in accordance with current Planning Practice Policy, Nottinghamshire County Council's Design Guide and other industry accepted guidance on Transport Assessments (TA). The HA will need to consider the detail of the transportation impacts once the application is made and the need to secure any necessary mitigation measures through condition or planning obligation.

The TA should include the following information: -

1. Baseline appraisal data, key analysis parameters and assessment methodology should be agreed with the HA before the full TA work is undertaken.
2. The number, size and frequency of the vehicles that will be associated with the construction and completed – operational phases of the proposal.
3. The proposed routing of the construction vehicles from the principal highway network, including vehicle tracking where necessary to show that the highway network can adequately accommodate construction vehicles access, egress and turning.
4. Details of the proposed temporary/permanent access(s) into the site, including achievable visibility splays, access widths, finished gradients, surfacing materials and drainage measures. The layout plan(s) should show the proposed access and its interface with the existing public highway network. This must be a topographical plan, accurately showing all street furniture/posts/trees/assets at a minimum scale of 1:500. Access arrangements and proposed highway improvements will require independent Stage I Road Safety Audit (RSA) to be undertaken in accordance with HD 19/15.
5. Details of the proposed parking / unloading / manoeuvring areas within the site during both the construction and operational phases by use of a comprehensive Construction Management Plan. (CMP)

6. Most temporary construction sites (expected to be mostly Agricultural field) should include proactive measures to prevent deleterious construction material and mud being transferred to the public highway i.e., Wheel wash facilities.
7. The reports should include detailed long-term management strategies to mitigate any negative transport impacts of the development and/to promote sustainable development.
8. The TA should include a chapter that deals with cable routing corridors and utility diversion/installation for National Grid connections.
9. Some sensitive rural roads will require condition dilapidation surveys prior to and after heavy construction work has been undertaken.

Please note this list is not exhaustive and the applicant will be expected to provide appropriate assessment information that reflects site conditions and its locality.

Furthermore, the HA reserves its right to vary its assessment requirements and the amount of detail required depending on the outcomes of the iterative transport evaluation process.

Rights of Way

The scoping opinion states that PROW outside of the adopted highway during the construction phase will be assessed as part of the Socioeconomics, tourism, recreational and land use chapter of the Environmental Statement

The County Council would like to make the point that all PROW are highways (whether they sit on the adopted network or run over private land) and should be considered as highways in the Transport Assessment. The Council does not agree this should be outside the scope of the TA, especially as there are so many PROWs (121 nos.) crossing and adjacent to the area. Please refer to the following guidance:

Public Rights of Way (RoW) are public highways and can be referred to as the minor highways network and are subject to the same legislation and regulations as the major highway network (roads and carriageways)

RoW can be temporarily closed to allow for construction/decommissioning as part of an application under a Temporary Traffic Regulation Order (TTRO), managed by the highway authority (Nottinghamshire County Council)

RoW can be permanently diverted (or extinguished) if the development cannot avoid them, under a Public Path Order (PPO). These require public consultation and should be discussed with the highway authority (NCC) at an early stage to avoid delaying the development. The orders should be made and confirmed prior to works starting on site

I hope these responses are helpful.

Yours sincerely



[Redacted Name]

Team Manager (Planning Policy) Nottinghamshire County Council