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Sent via email to
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16th January 2026

Dear Sir/Madam

**Ref: GREAT NORTH ROAD SOLAR PARK DEVELOPMENT CONSENT ORDER (DCO)
EN010162 – THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS EXQ1**

I write in response to the Examining Authority's (ExA's) written questions and requests for information (ExQ1) issued on 19th December 2025 and to provide the response of Nottinghamshire County Council (NCC) (Interested Party F332DD47C) in relation to those questions which are addressed directly to NCC, or the Interested Parties where relevant to the responsibilities of NCC.

ExQ1	Question to:	Question	NCC Response
2. Development Consent Order			
Q2.1.16	The applicant, NCC and NSDC	<p>Schedule 2 – Requirements</p> <p>Proposals are being developed to reorganise local government in Nottinghamshire which, if implemented, would result in a single tier of local government. It is therefore necessary that the dDCO should enable any of the requirements in Schedule 2 to be discharged by a superseding local authority? If so, how could this be accommodated?</p>	NCC has considered this further and confirms that any successor authority (such as a new unitary) would assume all of the statutory functions, rights and liabilities of the abolished Councils and therefore there is no need to amend the draft DCO to specifically address potential local government reorganisation.
Q.2.1.21	The applicant, NCC and Historic England	<p>Requirement 11: Archaeology</p> <p>The applicant, and other parties as relevant, are asked to address the following points: a. Does the reference at 11(1) to 'commence' include or exclude any permitted preliminary works? b. Is</p>	The proposed requirement wording for archaeology is insufficient to accommodate the complexity of a scheme where the applicant proposes a post-consent phase of evaluation to inform an updated Archaeological Mitigation Strategy (AMS), and multiple phases of work programmes. The following is based on appropriate wording that has recently been approved by the SoS for similar

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	<p>it acceptable that this be approved by the 'county authority', noted as being Nottinghamshire County Council? c. Is sufficient provision made for unexpected archaeological discoveries, areas with no known archaeology and the need for an archaeological watching brief? d. The Outline Archaeology Mitigation Strategy, section A11.8.6 sets out that following consent to proceed, the Written Scheme of Investigation (WSI) for the Stage 2 investigations will be submitted to the discharging authority (Nottinghamshire County Council) for approval. It also sets out that the Stage 3 Mitigation Measures WSI(s), would also be submitted to the discharging authority for approval. How would these provisions be secured through the dDCO? In addressing their points, the parties are invited to suggest alternative wording which would address any concerns raised.</p>	<p>schemes and address points (a) to (d) in the ExA question:</p> <p>(1) <i>No development may commence until an Archaeological Mitigation Strategy has been submitted to and approved by the County Authority, such approval to be in consultation with Historic England. This shall include:</i></p> <p class="list-item-l1">(a) <i>a scheme for additional trial trenching which has been submitted to and approved by the County Authority, in consultation with Historic England;</i></p> <p class="list-item-l1">(b) <i>additional trial trenching has been carried out in accordance with the scheme approved under sub-paragraph (a); and</i></p> <p class="list-item-l1">(c) <i>updates are made to the Archaeological Mitigation Strategy to account for the results of the additional trial trenching carried out and the updated Archaeological Mitigation Strategy is submitted to and approved in writing by the County Authority and Historic England.</i></p> <p>(2) <i>The authorised development must be carried out in accordance with the updated Archaeological Mitigation Strategy approved under sub-paragraph 1(c).</i></p> <p>(3) <i>No phase of the authorised development may commence, and no part of the permitted preliminary works for that phase may start, until a supporting Written Scheme of Investigation for that phase (which must accord with the revised final Mitigation Strategy) has been submitted to and approved in writing by the County Authority</i></p> <p>(4) <i>The approved scheme must identify—</i></p> <p class="list-item-l1">(a) <i>areas where archaeological work is required; and</i></p> <p class="list-item-l1">(b) <i>the measures to be taken to protect, record or preserve any significant archaeological remains that may be found including unexpectedly during construction (i.e. preservation in situ, preservation by record or mix of these elements).</i></p> <p>(5) <i>Pre-construction archaeological investigations and pre-commencement material operations which involve intrusive ground works may take place only in accordance with the approved Written Scheme of Investigation and any archaeological works must be carried out by a suitably qualified and competent</i></p>
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			<p><i>person or body previously notified to the County Authority.”</i></p> <p>The relevant authority for the discharge of the archaeology requirement would usually be the ‘county authority’, noted as being Nottinghamshire County Council.</p>
8. Cultural Heritage and Archaeology			
Q8.1.2	Historic England/ NCC/ NSDC	<p>Archaeological Desk-Based Assessment</p> <p>ES Chapter 11 Cultural Heritage and Archaeology [APP-054] section 11.5.1 (para 48) sets out that the conclusions of the Archaeological Desk-Based assessment [APP-251 - APP256] are predictive and probabilistic and the results of the geophysical surveys have not been ground-truthed in their entirety. As such, there are some cases where the potential presence of heritage assets or their significance are based upon professional judgement. Even so, it is suggested that precautionary approach, assuming a reasonable worst case scenario (that is, any archaeological remains currently present this will likely be damaged or destroyed by construction related activities such as groundworks and earthmoving which could take place anywhere within the Order Limits) is reasonable. It is suggested that this is sufficient for the identification and assessment of likely significant effects. The parties are invited to comment on whether this approach is reflected in the assessment overall,</p>	<p>We would broadly agree that the applicant has applied professional judgment reasonably and appropriately throughout their assessment. However, it is problematic that the geophysics results have not been tested in their entirety or indeed those areas where geophysics may not have been effective.</p> <p>It is also critical that the applicant assume the worst-case scenario for areas that have not been subject to either non-intrusive geophysical survey or trial trench evaluation. In Section 11.8 the applicant has provided a reasonable assessment of the likely impacts from development activity and provided an assessment of the worst-case scenario.</p> <p>However, the assessment is somewhat vague owing to the limited data set on the archaeological resource. In areas where non-intrusive survey and trial trench evaluation has been undertaken, the applicant can provide a detailed understanding of their impacts on any archaeological remains present and has already offered initial mitigation measures such as re-routing cable trenches. But in areas that have yet to be sufficiently evaluated, the applicant’s understanding is significantly limited, and we feel this introduces unnecessary risk to the deliverability of the scheme in terms of future delays and cost increases that could otherwise be avoided.</p>

		that is, is professional judgment reasonably and appropriately applied?	
Q8.1.3	Historic England/ NCC/ NSDC	<p>Approach to further archaeological Assessment</p> <p>Overall the Archaeological Desk Based Assessment [APP-251] concludes at A11.1.5 that there is the potential for buried archaeological remains of high heritage significance within the Order limits, with the highest potential for possible archaeological remains from the Neolithic, Bronze Age, Iron Age, the Romano British and the medieval periods. The need for, scale, scope, and nature of any further assessment and/or archaeological works following grant of the DCO would be approved following consultation with the local planning authority based on the outline Archaeological Mitigation Strategy (AMS) which sets out the proposed approach to further evaluation and subsequent mitigation.</p> <p>NPS EN-1 para 5.9.11 sets out that where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Noting</p>	<p>We would recommend that that whole order limits be subject to non-intrusive survey and evaluation trenching at the assessment stage so that the best possible understanding of the archaeological resource be obtained and that this data feed into the design and layout of the scheme.</p> <p>The applicant's approach has been to undertake a full desk-based assessment, a non-intrusive geophysical survey of the majority of the order limits to identify buried remains, (as far as possible within the constraints of the technique) and a targeted trial trench evaluation based on the results of geophysical survey. They have also undertaken evaluation in some 'blank' areas to assess the effectiveness of the geophysics results.</p> <p>The result of the assessment is that the applicant has a reasonably good understanding of the archaeological resource in those areas that they themselves have identified as having a high potential through desk-based and non-intrusive survey. This does constitute large areas of the site but is by no means comprehensive.</p> <p>In our experience, there will be areas of significant archaeological remains within the order limits that have not yet been identified or characterised due to the limitations of geophysical survey techniques. This is due to inherent bias in geophysical data that favours certain types of activities and therefore periods of archaeological activity. Prehistoric activity is often underrepresented in geophysical results and is often only incidentally picked up during evaluation trenching when later activity (often Roman and medieval) is targeted.</p> <p>The applicant has committed to a post-consent phase of evaluation work (non-intrusive survey and trial trench evaluation) to complete the assessment and provide a more comprehensive picture of the archaeological resource within the order limits. We have some concerns on the proposed approach to this, primarily</p>

		<p>this provision, the parties are invited to comment on whether the applicant has presented an adequate approach to assessment and mitigation.</p>	<p>that it still proposes to target areas of geophysical results, but does not propose significant evaluation outside of that. Currently we do not accept that the outline WSI provides for an acceptable post-consent scheme of assessment work, but the broad approach to mitigation work is generally agreeable and the fine detail will need to be present in the AMS prior to any construction work commencing.</p> <p>While we welcome the applicant's commitment to complete the assessment work, we maintain that this would be better undertaken prior to the DCO being consented and that a more detailed understanding of the mitigation requirements be obtained and factored into the overall scheme. However, we note that the SoS has recently found splitting the archaeological assessment work to be acceptable on similar schemes.</p>
Q8.1.13	NCC	<p>Archaeological Mitigation Strategy</p> <p>The Outline Archaeological Mitigation Strategy [APP-269] Section A11.8.1.3.4 refers to the role of the Archaeological Curator. Noting that this this relates to NCC, do NCC Archaeologists have any comments on the remit outlined for them here?</p>	<p>The remit is broadly agreeable, although should also include approval of a revised Archaeological Mitigation Strategy (AMS) which will need revising following the completion of any post-consent assessment work (see suggested Requirement wording above).</p>
Q8.1.14	Historic England/ NCC	<p>Mitigation through preservation by record</p> <p>The Outline Archaeological Mitigation Strategy [APP-269] Section A11.8.5.4 sets out various methods for preservation by record, where this is "the practicable or feasible approach for archaeology". Historic England and NCC are invited to comment on the suitability of the methods identified.</p>	<p>The proposed methods for mitigation by record are suitable and appropriate. It will be critical that that any areas requiring preservation by recorded are agreed with NCC and HE and are clearly detailed in the AMS and have a site-specific Written Scheme of Investigation (WSI) for each intervention.</p> <p>We would also recommend that any areas assigned to 'preservation in situ' (A114.8.5.3) are required to have an appropriate management plan in the AMS (outlined in A11.8.8) and that these are linked to the CEMP, OEMP and DEMP.</p>

Q8.1.15	The applicant/ NCC and NSDC	<p>Heritage engagement</p> <p>The Outline Archaeological Mitigation Strategy [APP-269] Section A11.8.7.5.1 sets out that public benefit and engagement with the community could help to offset some of the physical effects of the development. A potential location for a community archaeological project has been identified at the site of the proposed community orchard south of Vicarage Lane, North Muskam. This would be subject to a written scheme of investigation under the archaeological mitigation strategy. The applicant is asked to please provide further details. NCC and NSDC are invited to comment on the suitability of this provision.</p>	<p>We very much welcome the provision for community engagement and agree that this would enhance the public value and engagement with the historic environment, contribute to placemaking and provide information to the public on the special archaeological and historic interest of the area.</p> <p>However, we do not believe that this will offset some of the physical effects of the development, but will provide a necessary public benefit from the archaeological work. It is a valuable element of public engagement for the developer (often underutilised) and in our experience is very popular with local communities.</p> <p>We accept that the details for community engagement are necessarily limited at this stage, however provision should be made (in the final AMS) for lasting engagement during and after the archaeological work and post-construction through the operational lifetime of the scheme. We would not support a limited 'one off' event and the proposal should include multiple phases and a variety of public engagement techniques.</p>
Q8.1.18	Historic England, NCC and NSDC	<p>Significance of effects on heritage assets</p> <p>ES Chapter 11 [APP-054] section 11.5.4 sets out a framework for the assessment of the significance of effects on heritage assets. On the basis of Table 11.4 it is suggested that for assets, or receptors, of 'very high' or 'high' values, which could include a world heritage site or a Grade I listed building, a 'low' magnitude of effect, which could include a 'minor change in setting... (to) listed buildings, sites and other features which may lead to a small reduction in the contribution the setting makes to the significance of the heritage asset with</p>	<p>The 'Framework for the Assessment of the Significance of Effects' (Table 11.4) provides an approach that does act as a starting point for discussion about magnitude of effects and levels of harm. It places emphasis on professional judgement of 'major' and 'moderate' (for example). Paragraphs 69 – 71 provide suitable explanation of how this judgement process will deal with each heritage asset individually. There are no World Heritage Sites within the impact zone of the proposals. Of the 19 Grade I listed buildings within the 2km and additional 18 between 2 and 5km study areas, there are comments provided on the findings of the EA from NSDC regarding these.</p>

		<p>an <u>appreciable loss in the assets overall significance</u>', would have a 'minor' effect overall. According to para 72, this would then equate to 'less than substantial harm to heritage significance (lower end of scale)'. This would not be significant in EIA terms.</p> <p>Historic England /NCC/NSDC are invited to comment on whether this basis for the assessment is reasonable.</p>	
Q8.1.20	The applicant/ Historic England/ NSDC/ NCC	<p>Settings Assessment</p> <p>The settings assessment scoping exercise [APP-255] set section A11.2.3 (para 20) sets out that due to the large number of assets within the study areas, those within conservation areas have been grouped within their conservation area. The heritage assets identified as potentially being impacted by development in their setting are identified on Figure 11.4 [APP-161] and listed in ES Chapter 11 [APP-054] para 166. This does not include those listed buildings identified as being located within those conservation areas that have been scoped into the settings assessment (for example Kelham and Maplebeck Conservation Areas). It is not, therefore, clear whether the effect of the development within the settings of these buildings, has been given specific consideration. The applicant is asked to please clarify this point.</p>	<p>NCC agree that each of the built heritage assets within the conservation areas of Eakring, Kersall, Maplebeck and Kelham should be scoped into the assessment and looked at individually. We note that the conservation areas within the search area are not shown on Figure 11.4 and suggest Norwell should be scoped into the assessment.</p> <p>NDHA: RAF Ossington</p> <p>Only selected Non-designated Heritage Assets have been included in the assessment of impacts on 'setting'. We feel strongly that the RAF Ossington and the associated built remains (including the Battle HQ, runways, Nissen Huts etc) are impacted both directly and as a consequence of significant changes to their setting. The OL and development therein falls on the NDHA and has the potential to cause substantial harm (in NPPF terms) to the significance of the WWII airfield. We note that the HER entries for this site are presently undergoing review and enhancement as a result of recently discovered information. The site inspection contribution to the scoping exercise undertaken by the applicant and subsequent investigations have to date been insufficient to fully appreciate the significance of the airfield remains.</p>

		The other parties are invited to comment on whether this forms a robust basis for the settings assessment of all the identified designated heritage assets.	
11. Landscape and Visual Impacts			
Q11.1.12	The applicant, NSDC, NCC and interested parties	Cumulative landscape and visual assessment	It is noted that this question has been addressed to NCC however it has been agreed that NSDC will lead on Landscape and Visual Impact and therefore to avoid duplication, NCC defers to NSDC.
Q11.1.13	The applicant, NSDC, NCC and interested parties	Cumulative landscape and visual effects: Kelham Solar Farm	It is noted that this question has been addressed to NCC however it has been agreed that NSDC will lead on Landscape and Visual Impact and therefore to avoid duplication, NCC defers to NSDC.
13. Water Environment and Flood Risks			
Q13.1.4	NCC	<p>Local Impact Report</p> <p>In section 5.3 and appendix 2 of your LIR [REP1-078] you provide a number of comments and recommendations with regards to the flood risk assessment (FRA) undertaken by the applicant in Appendix A9.1 of the ES [APP-228]. a. Are any of your comments in conflict with the conclusions set out in A9.1.7 of the applicant's FRA? b. Do you consider the applicant's conclusions to be robust? In paragraph 5.3.5 of your LIR, you state that "the Flood Risk Assessment and associated Drainage Strategy is presently inadequate" and that "the project has the potential to have a negative impact if further assessment work and mitigation is not addressed". c. Could you briefly summarise what the negative impacts would be, and if you</p>	<p>As stated in para 5.3.5 of NCC's LIR the submitted Flood Risk Assessment and associated Drainage Strategy is presently inadequate. Until an adequate Flood Risk Assessment and Drainage Strategy is submitted, we are unable to comment on the applicant's conclusions. Should the applicant fail to adequately consider and mitigate surface water flood risk the key negative impacts could be: 1. Surface water flooding to the development, this may lead to failure of equipment, inability to access site for maintenance purposes, erosion of ground. 2. Increased risk of flooding to the surrounding area which could lead to flooding of residential and commercial businesses, roads and open spaces. Flooding of these areas can have significant detrimental impacts on the economy (e.g. loss of working hours, travel disruption, loss of earnings, mental health impacts, recovery costs) and residents health and wellbeing. NCC is prepared to work with the Applicant to overcome the deficiencies in the FRA and progress will be reported via the Statement of Common Ground, which will set out where our recommendations have been addressed or remain to be resolved.</p>

		consider that the proposed development would be in conflict with planning policy (EN-1, EN-3, EN-5, NPPF and local planning policy)?	
Q13.1.6	The applicant and all Interested Parties	<p>Sustainable drainage system design</p> <p>The ExA notes within the FRA [APP-228] that a specific sustainable drainage system strategy is not included for works 2 (as this is underground cables only), 3 (as this is for soft landscaping/ ecological enhancement only with no above ground infrastructure), 6 (as this is the existing National Grid substation), 7 (as this has not yet been constructed) or 8 (access improvements).</p> <p>a. To all IPs - Can you provide any concerns over the omissions of sustainable drainage system features from these works areas?</p>	We have no concerns over the omission of specific sustainable drainage systems for the quoted works areas.

I trust that our responses assist the examination but please contact me should you have any queries.

Yours faithfully,

[REDACTED]
 Planning and Infrastructure Manager
 Nottinghamshire County Council