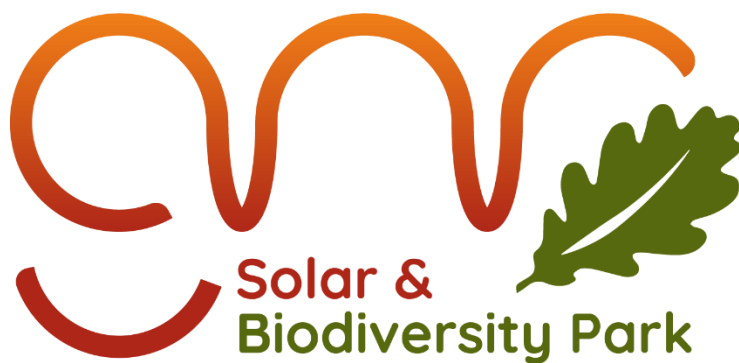




Great North Road Solar and Biodiversity Park

Responses to Deadline 1 Submissions

Document Reference - EN010162/APP/8.21

January 2026

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The Infrastructure Planning (Examination Procedure) Rules 2010

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1 INTRODUCTION

1.1 PURPOSE OF THE REPORT

- 1.1.1 This report provides the Applicant's responses to the Local Impact Reports (LIRs) and Written Representations (WRs) received at Deadline 1 in respect of the Great North Road Solar and Biodiversity Park (hereafter referred to as "the Development").

1.2 STRUCTURE

- 1.2.1 This document is structured as follows:

- Section 2 provides the Applicant's response to the points raised in NCC's LIR, including signposting to other responses and application documents where appropriate;
- Section 3 provides the Applicant's response to the points raised in NSDC's LIR, including signposting to other responses and application documents where appropriate;
- Section 4 provides the Applicant's responses to the WRs submitted by Category 2: Other Individual and Technical Stakeholders; and
- Section 5 provides the Applicant's responses to the other WRs submitted, on a thematic basis.

1.3 APPROACH

Local Impact Reports

- 1.3.1 At Deadline 1, LIRs were submitted by (Newark and Sherwood District Council ([REP1-075](#)) and Nottinghamshire County Council ([REP1-078](#)) as requested by the Examining Authority (ExA).
- 1.3.2 In addition to the NSDC LIR, NSDC also submitted a Summary of Verbal Representations from Issue Specific Hearing 1 ([REP1-076](#)), together with supplementary comments raising further points that could not be addressed within the hearings.
- 1.3.3 This report should be read alongside the following:
- **Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1] [[REP1-50](#)]**
 - **Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2] [[REP1-051](#)]**

Written Representations

- 1.3.4 A total of 38 WRs were submitted by Interested Parties ('IPs') at Deadline 1. Of these
- 4 were submitted by parish councils;

- 6 were submitted by other statutory consultees;
- 2 were submitted by a non-statutory organisation;
- 24 were submitted by members of the public, landowners, businesses; and
- 2 submission was submitted after the 10th December and that the ExA have accepted at their discretion.

1.3.5 All WRs have been categorised into one of three categories:

- Category 1: Statement of Common Ground Parties;
- Category 2: Other Individual and Technical Stakeholders; or
- Category 3: Themed Responses where similar issues have been raised by more than one IP.

1.3.6 All of the WRs submissions have been reviewed and considered by the Applicant. Technical specialists who were responsible for producing the documents that form the Applicant's application have been involved in responding to the issues raised.

1.3.7 This Report does not look to duplicate the **Applicant's Responses to Relevant Representations (EN010162/APP/8.16)** [\[REP1-065\]](#) which was submitted at Deadline 1. Where appropriate, and to avoid repetition, the Applicant has sought to cross-refer back to responses provided in that document, supplemented by additional information that has been entered into the Examination since that document was prepared.

1.3.8 The Applicant has initiated engagement via Statements of Common Ground (SoCGs) with a number of parties that have submitted a WR. The table below sets out the parties which have submitted WRs with whom the Applicant is negotiating SoCGs.

Table 1-1 SoCG Parties

SoCG Parties	SoCG Reference	Location of response to Deadline 1 submissions
Nottinghamshire County Council (NCC)	8.1	Section 2 of this Report.
Newark and Sherwood District Council (NSDC)	8.2	Section 3 of this Report.
Natural England (NE)	8.4	SoCG
Historic England (HE)	8.5	SoCG
National Highways (NH)	8.6	SoCG

SoCG Parties	SoCG Reference	Location of response to Deadline 1 submissions
National Grid Electricity Transmission plc (NGET)	8.7	SoCG
RWE Generation UK plc	8.8	SoCG
Cadent Gas Ltd	8.9	SoCG
Norwell Solar Farm Steering Group	8.12	SoCG

- 1.3.9 SoCG Parties that have not provided written representations are Environment Agency (EA), Network Rail Infrastructure Ltd, and Nottinghamshire Wildlife Trust. Further discussion will be provided in the relevant SoCGs.

Written submissions of oral cases and comments on relevant representations

- 1.3.10 Where IPs also submitted written summaries of their oral cases and comments on Relevant Representations, the Applicant responded to those submissions where appropriate.

2 RESPONSES TO NOTTINGHAMSHIRE COUNTY COUNCIL'S LOCAL IMPACT REPORT

2.1 OVERVIEW

2.1.1 The following topics were raised by NCC in their LIR:

- Historic Environment
- Ecology and Biodiversity
- Flood Risk and Drainage
- Traffic and Transport
- Public Rights of Way
- Minerals and Waste
- Development Consent Order
- Summary

2.1.2 The tables below provide the Applicant's response to these topics arranged under the headings listed above, supported by identification of sub-themes for clarity and ease of reference.

2.2 RESPONSES TO NCC'S LIR

Table 22-1 Responses to NCC Comments on Historic Environment

LIR para Ref	Summary Position of Interested Party	Applicant's Responses
<i>Historic Environment</i>		
5.1.1	Local Policy: - Newark and Sherwood Amended Core Strategy - Core Policy 14: Historic Environment	This is noted. Section 6.13 of the Planning Statement [EN010162/APP/5.4B] sets out an analysis of compliance with the NPS policies of EN-1 and EN-3 well as the National Planning Policy Framework ('NPPF') and local policies.
5.1.2	National Policy: - Section 5.9 of EN-1 (Historic Environment) acknowledges that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground (5.9.1); - Sections 5.9.16 to 5.9.21 presents requirements for mitigation of development impacts on archaeology identified within the order limits. - Additional guidance for Renewable Infrastructure and Cultural Heritage is presented at Sections 2.10.107 to 2.10.119 of EN-3 and expands slightly on guidance from EN-1.	This is noted.

LIR para Ref	Summary Position of Interested Party	Applicant's Responses
<i>Historic Environment</i>		
	• Section 2.10.112 and Footnote 94 of EN-3 require assessment to be include information on the Historic Environment Record (HER) and the results of pre-determination evaluation and that this in turn should inform design of the scheme.	
5.1.3	NSDC's LIR has comprehensively responded to the impact of the Development in relation to impacts upon built heritage assets and therefore NCC defers to NSDC in relation to impacts on built heritage assets. However, NCC wishes to draw particular attention to the impact on Ossington RAF WW2 Battle Headquarters, which does not appear to have been given sufficient consideration within the documentation, or referenced by NSDC. The asset is situated West of Ossington in the grounds of Ossington Hall and is within the order limits. NCC is in the process of enhancing the records for the site within its Historic Environment Record and is undertaking further research to identify the precise extent and nature of the remains. Therefore, the applicant should engage with NCC to discuss the location of solar arrays within the site.	As noted in Responses to Relevant Representations [EN010162/APP/8.16A], at page 284, the significance of former RAF Ossington rests principally in its archaeological and historic interest to which its setting does not contribute. The outline Archaeological Mitigation Strategy [APP-269] sets out an approach to further investigation and preservation in situ or by record. Once the NCC HER records relating to the WW2 RAF Ossington Battle Headquarters have been enhanced. The applicant will seek to engage with NCC with a view to agreeing an appropriate course of action in line with the processes set out in ES Volume 4, Technical Appendix A11.8: Outline Archaeological Mitigation Strategy [EN010162/APP/6.4.11.8A].

LIR para Ref	Summary Position of Interested Party	Applicant's Responses
<i>Historic Environment</i>		
5.1.4	The following comments within this section of the report are concerned with buried heritage (archaeology) related to the Development, which is not covered in the NSDC LIR.	Please refer the responses below.
5.1.5	The applicant has presented their assessment of archaeological potential and related development impacts at Chapter 11 of their Environmental Statement (APP-054) and figures in appendices APP-158 to APP-161. Technical reports including the desk-based assessment (DBA), geophysics report and trial trenching reports are provided at documents APP-251 to APP-267 and an outline mitigation strategy has been submitted at APP-268.	This is noted.
5.1.6	It is the Council's position that to properly assess the impact of a development upon archaeology, the applicant should provide sufficient desk-based research, non-intrusive survey and intrusive field evaluation to adequately understand the archaeological resource within the scheme and detail the proposed development impacts upon it. This is necessary to design an agreeable Archaeological Mitigation Strategy (AMS) to limit as far as possible the proposed development	ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8A] has been updated at Deadline 2. It is the Applicant's position that the desk-based research, non-intrusive survey and trial trenching undertaken prior to submission is sufficient to allow the development of an outline Archaeological Mitigation Strategy which proposes an initial stage of non-intrusive survey and, where necessary, trenching. It is noted that this accords with NCC's position.

LIR para Ref	Summary Position of Interested Party	Applicant's Responses
<i>Historic Environment</i>		
	impacts. The ES must present the full range of findings from this archaeological work and provide an evidential basis for at least an Outline Archaeological Mitigation Strategy (OAMS) for consideration at Examination.	The approach to pre-submission investigation is broadly in line with recently developed best practice guidance.
5.1.7	We welcome the archaeological assessment work undertaken to date and broadly welcome the approach undertaken by the applicant. The desk-based assessment (DBA) covers the full site, and the geophysical survey has been undertaken on the majority of the order limits. This has been largely sufficient to provide an acceptable level of data to inform the baseline for the Environmental Statement and an initial phase(s) of trial trench evaluation.	This is noted.
5.1.8	The limited evaluation trenching has targeted areas of higher potential identified in the DBA and geophysics data and some areas where the previous techniques indicated a lack of archaeological activity. However, the applicant acknowledges that the geophysics results have not been tested in their entirety (Para. 48) which we consider a serious limitation when undertaking an appropriate assessment and gathering	See response at 5.1.6 above

LIR para Ref	Summary Position of Interested Party	Applicant's Responses
<i>Historic Environment</i>		
	sufficient data to inform significance and impact. However, the OAMS has made provision for post consent geophysics and trial trench evaluation work that will potentially resolve the above issue if implemented appropriately. The OAMS has left the scope of this work to be agreed.	
5.1.9	We appreciate that solar farm development differs slightly from other development types and that some elements will not be fixed until post consent. While we maintain our position that the assessment work should be completed as part of the application/examination process to inform design, we accept that some evaluation work could be left until the detailed design has been fixed and when areas of higher impact can be properly targeted for intrusive evaluation. For instance, panel arrays may have a relatively low impact if cables are clipped up behind rather than buried in trenches behind, and details on this will help influence the level of intrusive evaluation required to characterise the archaeology and assess impact.	See response to 5.1.6 above
5.1.10	During the examination period, we would expect to further refine the OAMS in consultation with the	The Applicant and their consultants will seek to further refine the AMS in consultation with NCC during the examination period.

LIR para Ref	Summary Position of Interested Party	Applicant's Responses
<i>Historic Environment</i>		
	applicant and their consultants and agree an outline programme for the post-consent completion of the assessment work. There will also need to be specific wording included in the DCO with respect to the archaeology requirement which secures completion of the assessment work and provision for an updated AMS and its timely implementation prior to any construction work being undertaken. NCC will recommend more specific wording for the archaeology requirement that relates to the level of progress made with the applicant.	
5.1.11	In summary, based upon the work completed to date and subject to the applicant refining the details of the post-consent trenching and OAMS to our satisfaction, the impact of the Development on buried heritage would be neutral. However, without an agreed scheme for the post consent geophysics and trial trench evaluation work, the harm to buried heritage could be significant.	The Applicant is continuing to engage with NCC and has updated the ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8A] to reflect NCC's comments.

Table 2-2 Responses to NCC Comments on Ecology and Biodiversity

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
5.2.1	Local Policy: Newark and Sherwood Amended Core Strategy: Core Policy 12: Biodiversity and Green Infrastructure	This is noted. Section 6.10 of the Planning Statement [EN010162/APP/5.4B] sets out an analysis of compliance with the NPS policies of EN-1 and EN-3 well as the National Planning Policy Framework ('NPPF') and local policies.
5.2.2	National Policy: - Section 5.4 of EN-1 makes clear that the ES should clearly set out any effect on designated sites of ecological importance, protected species and habitats and other species identified as being of principal importance. The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity conservation interests and include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the development. - Section 2.10.75 of EN-3 provides additional guidance on ecological risks associated with renewable energy infrastructure and particular issues that should be considered by the	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
	applicant. Section 2.10.89 confirms that solar farms have potential to increase biodiversity value of a site and should aim to achieve biodiversity net gain by maintaining, extending, or creating new important habitats.	
5.2.3	NCC has reviewed the ES and associated documents in relation to ecology for the proposed development and has generally found the survey effort to be adequate. However, there are several clarifications sought, and further information is requested, as detailed under each relevant heading below. The applicant should address these shortcomings.	This is noted.
5.2.4	Further information in relation to fencing and wildlife movement is sought from the applicant as not enough detail has been provided. The ES chapter states that all perimeter fencing will have "a means to allow terrestrial animal species up to the size of an adult badger to move freely within their home ranges and to disperse without impediment". With section 8.5.12.6 mentioning mammal gates. No additional information has been provided in the OLEMP or OCEMP. Fences should not be	The Applicant has set out a response to the issue of wildlife movements and fencing in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.1.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
	gated to allow smaller mammals such as brown hare and hedgehog to move around the Site. In addition, a plan showing the fencing and proposed location of all fence gaps/movement corridors will allow better understanding of the proposed free movement for terrestrial mammals across the site.	
5.2.5	Paragraph 8.8.4.3 of the ES states: "Effects arising during decommissioning are likely to be similar in character, albeit of lower magnitude (i.e. negligible), to those during construction and subject to similar environmental controls through the Outline DRP (TA A5.6 [EN010162/APP/6.4.5.6]). It is assumed that the decommissioning phase, and its potential ecological effects, will be appropriately mitigated in line with the prevailing baseline conditions, guidance and policies such that they are acceptable. No significant effects are predicted".	This is noted.
5.2.6	This statement suggests that the decommissioning impacts for sites designated for nature conservation have been assessed in line with the current baseline of the site, when the impacts should be assessed for the future	ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045] requires decommissioning effects to be assessed against the current 'do nothing' baseline rather the baseline at the time of decommissioning. This is the approach

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
	baseline at the site. The land use of the site and species/habitats which currently utilise the site are expected to change over the lifetime of the development, thus impacting potentially more sensitive and rarer species. Further details are sought from the applicant to justify this predicted outcome of the decommissioning phase for sites designated for nature conservation.	presented in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] .
5.2.7	In addition, the Outline Decommissioning and Restoration Plan does not provide any details in relation to designated sites of nature conservation, whereas there is some limited information provided for the survey of habitats prior to the decommissioning phase. This document should include reference to update desk study and where necessary habitat/species surveys in relation to the potential impacts to designated sites in the future as its is likely these sites will change over the next 40 years.	The Applicant has set out a response to the issue of how designated sites are addressed in the Outline Decommissioning and Restoration Plan (DRP) in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.1. ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036] now includes explicit consideration of designated sites.
5.2.8	Specific fish surveys have not been undertaken at the Site, but the desk study identified the following: "Of the 16 records associated with watercourses directly linked to the Order	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
	Limits, most were from The Beck, the largest watercourse within the Order Limits, and European eel was the most frequently recorded, plus one record of brown trout and two of bullhead. River lamprey, sea lamprey and Atlantic salmon have been recorded in the wider catchment".	
5.2.9	Therefore, the ES chapter concluded that fish have been assumed in all watercourses and appropriate mitigation measures outlined within the OCEMP, with Horizontal Direct Drilling (HDD) proposed as a mitigation method under the most sensitive watercourses, which is considered to be the most appropriate method.	This is noted.
5.2.10 and 5.2.11	No timings have been provided to undertake these works, and mitigation should include the avoidance of spawning season or any additional timings sensitive to fish species to prevent any disturbance. A5.3.11.11.3 Mitigation section defines mitigation measures for the potential effects on fish. The timing of works to avoid sensitive times of year includes a suggestion of the Autumn migration of eels, but no further details have been provided. Given the presence of fish	The Applicant has set out a response to the issue of the timing of mitigation for fish in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.2.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
	within the watercourses is unknown, further mitigation is required. Therefore, specific times of the year when works can be undertaken, such as outside of the spawning season should be provided. The mitigation measures for HDD will also need to be updated to including timings as outlined above.	
5.2.12	A number of rarer and scarce breeding bird species were identified breeding within the order limits. The proposed mitigation will be undertaken in a phased approach to provide compensatory habitat prior to the start of works is considered well thought through and a commendable approach. We have not had sight of the breeding bird survey results appendix and therefore will provide further comments on receipt of this information from the applicant.	The Applicant has set out a response to the issue of the breeding bird baseline data in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.3.
5.2.13	Our main queries prior to this are: • Were specific nightjar and other crepuscular species surveys undertaken, given the sites location within Sherwood Forest ppSPA. • The ES chapter claims the surveys were undertaken in line with best practice guidelines and references, but this survey methodology	The Applicant has set out a response to the issues of breeding bird surveys and analyses in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.3.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
	requires a minimum of 6 surveys, and not four which the applicant has undertaken. In addition, this survey methodology also states: "Any deviation in the number of surveys must be supported with detailed and robust justification. Additional survey effort may need to be considered for large-scale projects with the potential to have significant impacts on birds, and/or for high profile, sensitive projects". Further justification for the level of survey effort undertaken is therefore sought. • The site has been assessed as regional value to breeding birds with SPI, LBAP, LWS-qualifying species and Schedule 1 WCA species recorded. Should further analysis of this be undertaken given the potential qualification of a LWS feature. Outline LEMP	
5.2.14	The outline Landscape and Ecological Management Plan (OLEMP) provides recommended species to be planted as part of the habitat creation and enhancement works. As these are all recommendations at this stage, we will provide further comments once the finalised species lists and creation works are known.	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
5.2.15	Within the OLEMP a number of wildlife boxes and refugia are proposed. Given the overall scale of the order limits a total of 23 bat boxes and 21 bird boxes including 2 barn owl boxes is not considered sufficient.	The Applicant has set out a response to the issue of wildlife boxes and refugia in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.7.
5.2.16	Outline Construction Environmental Management Plan (OCEMP) details measures to be undertaken if an Invasive Non-Native Species (INNS) is identified within a working area only, but three INNS were identified as part of the baseline habitat surveys (6.4.8.3 Environmental Statement Volume 4 – Technical Appendices Technical Appendix A8.3 – Habitats and Vegetation Baseline - Rev 1) including Himalayan balsam, Japanese knotweed and giant hogweed. With four stated to be present within the ES (in addition New Zealand pygmy weed) The Himalayan balsam was recorded along the Beck which is within the order limits and along the River Trent. No plans showing the locations of these have been provided which would be helpful to understand the locations of these species. In addition, no mitigation other than the management of invasive species has been provided, with only	The Applicant has set out a response to the issue of invasive non-native species (INNS) in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.4. Section A5.3.11.12 of ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] includes additional mitigation for INNS.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Ecology and Biodiversity</i>		
	biosecurity measures to prevent and manage species within a working area provided.	
5.2.17	With the limited information provided within the reports, NCC cannot determine where the INNS are located within the order limits. Further clarification is sought from the applicant as well as a commitment to control and remove these species, as they are likely to spread both within the order limits and outside of the order limits over the 40 year lifespan of the proposals.	The Applicant has set out a response to the issue of invasive non-native species (INNS) in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.4. Section A5.3.11.12 of ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3B] includes additional mitigation for INNS.
5.2.18	Table A5.3.11 Cable Crossings within Work no. 2 Cable. This provides an overview of the watercourse and methods as well as the rationale for the method of crossing use. In terms of ecological reasoning only the habitat type, whether the watercourse will impact a designated site of nature conservation or if the watercourse is a WFD or supports water vole are given for justification of use if HDD. The rest of the watercourses, although I am aware may not all be suitable, but there does appear to be a large amount subject to open trench methods. Other species appear not to be included within this justification i.e. fish which	The Applicant has set out a response to the issue of watercourse crossings in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.6.

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	are impacted through these methods. Further justification for the use of Open Trench methods needs to be sought from the applicant for the watercourses subject to this method.	
5.2.19	American mink has been recently recorded within 2km of the order limits, as provided by the desk study information. It is understood that no evidence of this invasive species has been identified within the order limits as part of the water vole surveys, but the known presence of this species within the wider area could threaten the population of water vole within the order limits. A commitment to regular monitoring of the site in relation to the water vole population and control of American Mink should they be identified would be a welcomed as addition to the solar parks biodiversity commitments. This would also positively boost wider efforts such as the reintroduction of water vole in northern Nottinghamshire and other solar parks commitments to the control of this invasive species.	The Applicant has set out a response to the issue of American mink in the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] , Table 2.1, ref 2.1.5.
5.2.20 & 21	Decommissioning impacts A5.6.2.3 Vegetation Planning states: "21 Woodland and hedgerows (except those	Second hedges would be removed where they are alongside permissive routes. Given that decommissioning would remove the permissive routes, the separation between the route and the rest of the field it

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	created to form a second hedge alongside a permissive route) will be retained, as will the community orchard". Further clarification should be sought from the application on the proposed removal of any second hedgerows. Hedgerows are valuable resources for wildlife, and the removal of established hedgerows should not be undertaken.	passes through would no longer be needed and the removal of hedges would enable the land to return to agriculture. Despite this loss, there would remain a large net gain in hedgerows over the baseline.
5.2.22	In relation to section A5.6.6.6 Management of Sediment and Surface Water. This section provides details of silt traps, silt matting, check dams. However, the wording within this section of the Outline DRP suggests that the check dams will be installed in drainage ditches – these could potentially hold protected species and therefore require either no impacts to the ditches or protected species surveys prior to the installation of these features. No information about the removal of the silt traps, silt matting, check dams and lagoons once the decommissioning has been undertaken has been provided.	The Applicant can confirm that measures to control sediment would only be installed in new drainage ditches and not existing ditches.
5.2.24/ 25	Biodiversity Net Gain As BNG is not a mandatory requirement for NSIPs, NCC has not reviewed the supporting	This is noted.

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	information for this element in great detail. NCC is aware that colleagues within NSDC are providing comments in relation to this and support their comments in this aspect.	
5.2.25	Summary: The assessment methodology and proposed mitigation in relation to ecology is largely adequate, however there are several clarifications required with respect to the assessment work and refinements to the managements plan, as referred to above. Subject to implementation of these recommendations and the agreement of a suitable scheme of BNG, it is not considered that the Development would have a detrimental impact upon ecology.	Agreement noted that, subject to the recommended changes and clarifications, the Development would have no detrimental impact upon ecology.

Table 2-3 Responses to NCC Comments on Flood Risk and Drainage

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Flood Risk and Drainage</i>		
5.3.1	Local Policy:	This is noted. Section 6.5 of the Planning Statement [EN010162/APP/5.4B] sets out an analysis of compliance with the NPS

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	- Newark and Sherwood Amended Core Strategy - Core Policy 10: Climate Change	policies of EN-1 and EN-3 well as the National Planning Policy Framework ('NPPF') and local policies.
5.3.2	National Policy: - Section 5.8.15 of EN-1 includes assessment principles for judging impacts of energy projects on flood risk and sets out the minimum requirements for Flood Risk Assessments. - Further advice on potential impacts of solar farms is provided in Sections 2.10.75-92 of EN-3. This confirms that the FRA should consider the impact of drainage but notes that as solar panels drain to the existing ground, the impact will not, in general, be significant. - Given the temporary nature of solar farms, EN-3 advises sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.	This is noted.
5.3.3	NCC is the Lead Local Flood Authority (LLFA) for the proposal site and is responsible for the management of food risk from local sources including surface water, ordinary watercourses and groundwater. In its capacity as the LLFA, NCC has commissioned AECOM to review the	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Flood Risk and Drainage</i>		
	applicant's flood risk assessment (FRA) and surface water drainage strategy, examining their methodologies and consistency with relevant policies and guidance such as the NPPF/PPG, DEFRA's Non-statutory SuDS Standards, CIRIA C753, and NCC's Local Flood Risk Management Strategy (LFRMS) Part 5.2. It also assesses the potential impact on local flood risk, considering surface water, ordinary watercourses, and groundwater. The review has covered the following: • APP-028 Location plan • APP-052 ES Chapter 9 (water resources) – relating to surface water and flood risk only • APP-148 to APP-153 ES Chapter 9 figures • APP-228 ES Appendix A9.1 Flood Risk Assessment	
5.3.4	The review has found that the information provided in the FRA and supporting drainage documentation is sufficient to outline the overall strategy. However, there are areas where information is limited or missing, which makes it difficult to confirm full compliance with agreed design parameters. A full report outlining our comment and recommendations to the	As set out in the responses in Table 2-3 of the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A], the Development is at an outline stage in the design process, and the detailed design is then secured by requirements in Schedule 2 of the Draft DCO [EN010162/APP/3.1C]. ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039] establishes the drainage principles which will inform the detailed drainage design, which is then

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<i>Flood Risk and Drainage</i>		
	applicant is provided in a table which is appended to this LIR and NCC would strongly encourage the applicant to review the appended advice in detail. However, in summary, NCC would request the following information from the applicant in order to ensure compliance: • Provide meeting minutes from consultation with the LLFA, the Environment Agency and any other relevant stakeholders • Provide details of existing drainage across the site including BESS's and substation. • Undertake a site wide hydraulic model to better understand how water flows across the site. • Include an assessment of a fluvial defence breach scenario to provide a complete understanding of flood risk. • Provide appropriately scaled flood mapping (e.g. 1:30,000 on A3) to enable a more robust review. • Provide drawings showing what is proposed in each work area.	secured through a requirement in the Draft DCO [EN010162/APP/3.1B] [REP1-005]. Sections A9.1.2 to A9.1.6 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039] discusses the management of surface water from all aspects of the Development, such as formal SuDS for Work Areas 4 and 5 and RSuDS for Work Area 1, to ensure there is no increase in the runoff rate. A detailed drainage plan will be submitted before construction can commence for each relevant phase of the Development. This approach is consistent with other consented solar DCO applications, such as Mallard Pass Solar Farm, West Burton Solar Project, Cottam Solar Project and Byers Gill Solar. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO. As noted within the response, the Development is unlikely to interact with existing infrastructure such as culverts. Section 9.4.7 Surface Hydrology of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052] outlines the drainage features across the Core Study Area (CSA), based on the Order limits. As outlined in Section A9.1.1.8 Pluvial Flooding of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039], 2D pluvial hydraulic modelling has been undertaken for areas within the CSA which the Development could interact with.

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<i>Flood Risk and Drainage</i>		
	• Assess compensatory flood storage requirements, particularly within the substation area, to address any loss of floodplain storage • Evaluate the increase in flood risk from new impermeable areas and crossings and clearly specify proposed surfacing types. • Provide a site wide layout plan showing all catchments, SuDS features, discharge points, exceedance flow paths, and connectivity to receiving watercourses. Overlay with flood depth mapping to verify separation from high risk areas. • Confirm the drainage system can operate under surcharged outfall conditions. • Design attenuation basins at the BESS area to consider either the 1 in 2-year storm with firewater or the 1 in 100-year storm with climate change. Further details of the basin should also be provided, including water depth, outfall, storage capacity, and modelling results. • Provide an assessment of potential water quality effects.	Storm durations used in modelling reflect the nature of the catchment assessed. As the CSA is predominantly rural, the peak 1 % AEP event has been assessed in accordance with the parameters outlined within the Table in Section 4.2.1 of the EA's What is the Risk of Flooding from Surface Water map? Report. The results (extent and depth of flooding) of the pluvial modelling across the Site are presented in Figure A9.7 within Appendix D of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039]. Work Area 5b: 400 kV Substation is located within Flood Zone 1 and therefore will not require compensatory storage. As outlined in Section A9.1.2.2.1 River Trent (Fluvial) of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039]. Work Area 6: National Grid Staythorpe Substation is located within the 1 %AEP + 23 % CC extent (30 % CC used as proxy) and is mostly modelled to flood to depths of less than 0.1 m (i.e. within the main platform area), as shown in Plate A9.1.26. The National Grid Staythorpe Substation has private hard (walls) and soft (embankments) defences to a level of 13.10 m AOD. As such, Work Area 6 is unlikely to be inundated during the 1 % AEP + 30 % CC and 39 % CC events, should the Development operate marginally into the 2080s epoch. An absence of a design for Work Area 6 means that the volume of theoretical future floodplain loss cannot be provided at this stage. Should Work Area 6 be used as the connection point for the Development then the volume of floodplain loss would be negligible, given the minimal flood depths and the type of infrastructure needed in

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Flood Risk and Drainage</i>		
	• Site wide exceedance routing plan to confirm protection of sensitive infrastructure and no predicted impacts to third parties. • The applicant should provide quantitative evidence to show that the solar arrays will not increase runoff with the proposed berms and filter drains. Further detail is needed on the design and function of the filter drains, including storage, infiltration, and outfall arrangements, as well as how runoff will be collected, conveyed, controlled, and discharged. • Resilience of solar panels and infrastructure to lateral flood flows is assessed to ensure stability and minimise flood damage. • Provide a maintenance plan that includes all SuDS features. • Recommended that a soil management plan is prepared to mitigate compaction risks during construction through defined haul routes, suitable machinery, phasing, and decompaction. • The applicant should show how groundwater depth has been considered in the basin design,	that area e.g. thin bus-bar poles etc. Once the design of the Development has been finalised then the need for minor compensatory storage can be established. As outlined in Section A9.1.4.2 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039]. There will be a dedicated lined (clay or synthetic liner) holding basin, separate to the SuDS structures to serve Work Area 5a, available for spent firefighting water to be pumped to in the event of a battery fire during heavy rainfall. As such, the SuDS system will not reach capacity during such an event. Only a very small section of PV arrays is located within Flood Zone 2, following the latest update to the Flood Map for Planning (November 2025), in the east of the Order limits, towards Carlton-on-Trent. All other PV arrays are located within Flood Zone 1, meaning fluvial flows will not interact with the racking mounts for the lifetime of the Development in these areas. The racking mounts will be made of high tensile metal. Velocity is a major factor in aggravating structure and content damage, as the additional force of high velocities creates greater danger of foundation collapse. McBean et al. (1988) states that a velocity of 3 m/s acting over a depth of 1 m will produce a force sufficient to exceed the design capacity of a typical residential wall. Pluvial flows within all work areas will not exceed 3 m/s even on steep slopes. As such, the PV will be safe for its lifetime in accordance with NPS EN 1.

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	assess seasonal changes, and commit to monitoring. • Recommended that the drainage strategy is revised to fully consider SuDS that integrate with the overall drainage scheme and are not bolted on. • Provide details of all proposed watercourse crossings, including confirmation of design flood standards, soffit levels, and arrangements to maintain existing flows. • Confirm and agree the assessment epoch with the Environment Agency to ensure coverage of the full decommissioning and demobilisation period.	The Applicant notes that without proper maintenance then the functionality of SuDS features could reduce over time. Maintenance of the grassland for Work Area 1: Solar Area is outlined in the [EN010162/APP/ 6.4.5.1B]. An outline maintenance plan for SuDS features will be provided within the ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B] [EN010162/APP/ 6.4.5.1B]. When the final design of the Development is undertaken then the final LEMP will be updated to confirm the maintenance requirements for SuDS features. ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2A] was submitted with the DCO application, and details measures to avoid compaction during all phases of the Development. Section A9.1.3.1.3 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039], outline measures to avoid compaction of the ground during construction activities. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO, and will seek to avoid interaction with groundwater levels. Figures A5.3.1 and A5.3.2 of ES Volume 4, Appendix A5.3: Outline CEMP [EN010162/APP/ 6.4.5.3B] show the locations cable and access track crossings of watercourses. Section A5.3.9.5.4 Watercourse / Drainage Ditch Crossings of ES Volume 4, Technical Appendix A5.3: Outline CEMP [EN010162/APP/ 6.4.5.3B] states that Crossings will be designed as

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		part of detailed design, post-consent, and commits to the soffit level of any bridges sitting above the design flood level. The design flood level for permanent crossings would be the 1 % AEP plus Higher central climate change scenario (39 % CC) and will involve the following parameters: • Soffit height of the bridge will be a minimum of 600 mm above the 1 % AEP + Climate change allowance flood level; • All abutments must be set back a minimum 1m from the top of the bank and as minimal as possible; • Any loss of floodplain due to abutments and ramps will need to be compensated for, as outlined in the oCEMP; • All parapets and railings need to be permeable and open as possible with a minimum 100 mm spacing; and • The Development has been redesigned to avoid placing Works Areas 1, 4 and 5a and 5b within the 1 % AEP + 39 % CC extent for the River Trent and the 0.5 % AEP tidal events (plus climate change (23 %) in accordance with Table 2 of <i>Accounting for residual uncertainty: an update to the fluvial freeboard guide</i>, Table 2 of the Engineering Design Standard, EDS 07-0106 Substation Flood Protection (2016) and Energy Networks' Associations Engineering Technical Report 138 (ETR138). As outlined in Requirement 19 of the Draft DCO [EN010162/APP/3.1C], if the undertaker anticipates that the operation of any part of Work Area

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		1 will continue after 31 January 2069, it must submit to the planning authority (following consultation with the Environment Agency): • an updated flood risk assessment of the flood risk arising from the continued operation of that part of Work No. 1 after 31 December 2069; • the details of any mitigation or compensation measures that the flood risk assessment under paragraph (a) recommends are necessary; • the implementation timetable, including identifying the need for (but not requiring a specific programme for the obtaining of) any consents, for any measures identified under paragraph (b); and • retention proposals for any measures identified under paragraph (b) for the remaining lifetime of the authorised development.
5.3.5	In summary, should the recommendations within this report (as detailed in the appendix) be implemented it is anticipated that the impact upon local flood would be neutral, however the impacts are currently uncertain as the Flood Risk Assessment and associated Drainage Strategy is presently inadequate and, as such, the project has the potential to have a negative impact if further assessment work and mitigation is not addressed.	The Development has Work Areas and does not have a detailed design at this stage, therefore ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039], proposes drainage principles which will be secured through a requirement in the Draft DCO [EN010162/APP/3.1C]. Sections A9.1.2 to A9.1.6 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039], discusses the management of surface water from all aspects of the Development, such as formal SuDS for Work Areas 4 and 5 and RSuDS for Work Area 1, to ensure there is no increase in the runoff rate.

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		A detailed drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO and this approach is consistent with other consented solar DCO applications, such as Mallard Pass Solar Farm, West Burton Solar Project, Cottam Solar Project and Byers Gill Solar. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO.

Table 2-4 Responses to NCC Comments on Traffic and Transport

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<i>5.4. Traffic and Transport</i>		
5.4.1	Local Policy: • Newark and Sherwood Amended Core Strategy o Spatial Policy 7: Sustainable Transport	This is noted. Section 6.14 of the Planning Statement [EN010162/APP/5.4B] sets out an analysis of compliance with the NPS policies of EN-1 and EN-3 well as the National Planning Policy Framework ('NPPF') and local policies.
5.4.2	National Policy: • EN-1 Section 5.14 acknowledges that the transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks (5.14.1). The	This is noted.

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<i>5.4. Traffic and Transport</i>		
	statement sets out that the ES should be supported by a transport appraisal and that appropriate mitigation should be identified having regard to the needs of freight at all stages in the construction and operation of the development. • EN-3 provides further guidance on the assessment of impacts and potential mitigations in relation to construction traffic associated with solar farms. Paragraph 2.10.141 states that where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.	
5.4.3	Please note that many of the documents submitted cannot be viewed on NCC computers due to memory being exceeded. Due to this, it is currently not possible to manipulate, measure or view many of the documents and therefore comments are limited to visual appraisal. Only a few of the access	While the Applicant is willing to provide any specific documents requested by NCC, it is the Applicant's understanding that the documents published on the public domain are accessible.

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<i>5.4. Traffic and Transport</i>		
	drawings have been seen. We would request that applicant optimise/compress or split the PDF documents, so that these can be downloaded.	
5.4.4	It would be helpful when referring to appendices or figures throughout the Transport Assessment (TA) to reference the particular part in which they are found.	Noted. The document titles for all nine parts of the Transport Statement [EN010162/APP/6.4.14.1A] have been revised to clearly reflect the appendices they contain.
5.4.5	The response document has not acknowledged the key matter of the study area. Whilst A14.1.1.5 of TA states that the general scope of assessment was agreed in principle with NCC, this is not the case and we remain concerned that, whilst the TA now acknowledges that some traffic will arrive from the west, it is stated that this will be minimal, but provides no evidence to support this. Furthermore, this approach appears to be contrary to the Travel to Work Areas diagram in Figure 13.1.	Traffic travelling to and from the west on the A616 and the A617 has now been included in the revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] . This includes a link sensitivity rating and screening assessment.
5.4.6	This means that routes including the A616 and A617 to the A614 have not been considered and whilst Paragraph 41 of CH14 suggests that the approach taken provides a worst case scenario by routing all traffic from the A1, this	Traffic travelling to and from the west on the A616 and the A617 has now been included in the revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] . This includes a link sensitivity rating and screening assessment.

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5.4. Traffic and Transport		
	is considered neither reasonable nor realistic and ignores the possible impacts on the A616/A617/A614 to the west of the study area as currently presented.	
5.4.7	Furthermore, acknowledging that some traffic is likely to arrive from the west but not considering it properly could make enforcement of use of the prescribed routes problematic. Forcing vehicles arriving from the west to use the prescribed route along the A1 would increase journeys from the A614 by around half an hour and 30 miles, which, contrary to the referenced 'efficient transport routes' is neither reasonable, practical nor within the spirit of sustainable transport.	ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] outlines that all construction traffic will be advised in advance of the permitted routes to site, it is the expectation that contractors will plan their route to site in advance to ensure the most economic and efficient route is used via the A1.
5.4.8	Furthermore, it is stated that assigning all traffic from the A1 provides a robust assessment, but applying the 'Rochdale Envelope' principle in this light would also suggest a requirement to test the outcome if all traffic approached from the west.	It is not considered appropriate to assess all traffic approaching from the west, as all traffic will be required to travel from the A1 to the east – this will form part of the contractual agreement with the contractor to only use permitted routes to site. Notwithstanding, the ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] does now consider 50% of traffic arriving from the west and now includes a screening assessment of the A616 and A617.
5.4.9	The application documents refer to phasing and intentions of phasing, but the draft DCO identifies that phasing is to be a matter for	Paragraph 97 of ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048] notes that a realistic worst-case

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<i>5.4. Traffic and Transport</i>		
5.4.10	subsequent approval. The DCO does not specify a minimum number of phases, and this should be amended to reflect the transport assessment work. The TA has considered traffic within what it states to be the most cumulatively concentrated phases; phases 1 and 3 which are stated to represent the southern phases, with the northern phases 2 and 4 having less traffic. It is claimed that the worst-case scenario assumes the 3 southern phases being built concurrently followed by the 2 northern phases would be the worst case.	scenario is for the development to be constructed in, effectively, 2 phases, which is what has been assessed in the transport chapter. ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] has been updated to assess a combination of the two highest monthly periods of traffic from two concurrent phases. The results are presented in the updated ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] remain unchanged.
5.4.11	However, a condition application could be made for phases 3 and 4 followed by phase 1, 2 and 5, for example and phases 3 and 4 are the most traffic-heavy, meaning that the most intensive potential phasing has not been considered.	As above - The revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] now assesses a combination of the two highest monthly periods of traffic from two concurrent phases. The results are presented in the ES Chapter and the assessment findings remain unchanged.
5.4.12	Compounding this, in Appendix F of the TA the phases are described as PH1 – south PH2 – southwest, PH3 – northwest and PH4 – north, which would mean that phases 1 and 2 would be the southern phases and phases 3 and 4	As above - The revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] now assesses a combination of the two highest monthly periods of traffic from two concurrent phases. The results are presented in the ES Volume 2, Chapter 14: Traffic and

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
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	the northern phases – the latter two being the most traffic-heavy.	Transport [EN010162/APP/6.2.14A] and the assessment findings remain unchanged.
5.4.13	It is considered therefore that the TA may not have assessed impact in line with the Rochdale Envelope principles and as such the submitted information should be reviewed for consistency, with any discrepancies addressed.	As above - The revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] now assesses a combination of the two highest monthly periods of traffic from two concurrent phases. The results are presented in the ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] and the assessment findings remain unchanged.
5.4.14	A drawing identifying the phase locations would also give greater clarity.	As above - The revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] now assesses a combination of the two highest monthly periods of traffic from two concurrent phases. The results are presented in the ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] and the assessment findings remain unchanged.
5.4.15	The impact assessment does not appear to consider phasing. It would be helpful to provide diagrams showing the traffic proposed on the links and from which phase.	As above - The revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] now assesses a combination of the two highest monthly periods of traffic from two concurrent phases. The results are presented in the ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] and the assessment findings remain unchanged. Appendix F of the Transport Statement identifies which access is assumed to be within each phase.

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5.4.16	Whilst the calculations for HGV loads appear conservative, the operative trip generation has been calculated against an assumption of 50% travelling by shuttle bus, alongside a car share ratio of 1.5 These assumptions appear to be very optimistic, and whilst travel planning measures may be included in the draft Travel Plan, it may not be considered reasonable to force staff to travel by a specified means. If applying the Rochdale Envelope approach therefore, it is not thought appropriate to apply such optimistic discounts.	The assumptions in relation to shuttle bus usage and car share ratio are consistent with similar proportions used in other DCO applications. For example: • West Burton Solar Project (PINS Ref: EN010132) assumed 50% of workers will arrive by shuttle bus and assumed a 1.5 construction workers per car • Cottam Solar Project (PINS Ref: EN010133) assumed 50% of workers will arrive by shuttle bus and assumed a 1.5 construction workers per car • Longfield Solar Fram (PINS Ref: EN0110118) assumed 55% of workers will arrive by shuttle bus and assumed a 1.5 construction workers per car The Applicant will have full control of who can access the Site, to the extent that only workers travelling by a vehicle needed for their trade, such as transit vans/trucks containing tools, being allowed on-site. These commitments are then set out in the Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2B] and further details set out in the Detailed CTMP secured by Requirement 14 of Schedule 2 of the Draft DCO [EN010162/APP/3.1C]. Notwithstanding the above, calculations within the revised ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] now consider 30% of workers using the shuttle bus and a ratio of 1.3 for car sharing.

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5.4.17	There is inconsistency across the submission in respect to the number of accesses. The TA in paragraph 136 refers to a total of 41 accesses, The Outline Construction Traffic Management Plan and Site Access Location drawings identifies 43 accesses and the DCO lists 19 permanent accesses in Schedule 4 Part 1. Schedule 6 of the DCO identifies 32 permanent accesses and whilst 16(b) of the DCO refers to temporary means of access to works being within Part 2 of Schedule 6, there is no Part 2. Furthermore, paragraph 138 of the TA states that all access locations will be retained for continual use during the operational phase suggesting that none are temporary. Clarity is therefore required over these discrepancies.	The Development proposes 43 site accesses, of which 19 will be a Primary Access and 24 will be a Secondary Access. All accesses are to be retained for use during the operational phase. The Transport Statement [EN010162/APP/6.4.14.1A] and ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] have been updated at Deadline 2 to correct these points. Please refer to the Applicant's response to Q2.1.8 in the Responses to ExA's First Written Questions [EN010162/APP/8.22] which suggests that Article 16 was drafted before it had been determined that there were to be no specified temporary means of access. As such, article 16(b) has been deleted, as has the reference to Part 1 of Schedule 6.
5.4.18	The TA refers to an overview of the accesses being shown on Figure 14.7. However, a figure with this number has not been able to be located within the submitted documents. It is thought that it may have been intended to refer to the 4 drawings in Appendix A, 14.1.7NE 14.1.7NW 14.1.7SE 14.1.7SW. As detailed	Paragraph 133 of the Transport Statement [EN010162/APP/6.4.14.1A] has been updated with the correct reference to the figures that show site access locations. They can be seen in ES Volume 3, Figure 14.4: Site Access Locations [EN010162/APP/6.3.14A] [AS-046] and/ or Figure A14.1.7 within the Transport Statement.

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	above these show 19 primary accesses and 24 secondary accesses.	
5.4.19	We seek clarification over secondary accesses where these form the only access to a parcel as it is unclear how these can be considered secondary. It would appear counter-intuitive for an HGV to turn into an opposite parcel to enable it to turn around to cross over using a secondary access, the turning movements would require a large area of hardstanding and likely jet washing of wheels prior to re-entering the public highway (SA8/9 and SA22 being examples where clarification is sought).	Construction traffic will route to a Primary Access, which have been identified as the main access where vehicles will register their arrival. These have been designed to accommodate all vehicle movements. It may be necessary an HGV to turn into a primary access before entering a secondary accesses.
5.4.20	We previously requested that each access point was justified alongside the numbers of vehicles using them. Whilst this is stated to be clarified, it is not clear where, or the information given is unclear. Table A14.1.3 provides information on construction traffic on links rather than accesses. We would specifically question why PA5 and PA6 are both required.	The number of vehicles expected at each primary access point has now been included with the Transport Statement [EN010162/APP/6.4.14.1A] within Table A14.1.6. Both site access PA5 and PA6 are required as the parcels of land are separated by a small strip of land not within the Order Limits.
5.4.21	Paragraph 126 identifies that the hierarchy of roads to provide access has been adopted as the SRN and A roads are designed to handle higher volumes of traffic to ensure that	Measures have been identified within the Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] to reduce the impact on the road network.

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	congestion on localised roads is minimised to ensure a smoother traffic flow. This approach does not recognise that more traffic would be held up on the A roads, many of which form part of Nottinghamshire's Major Road Network, potentially creating greater disruption. There are 3 accesses proposed on A roads.	The Outline CTMP [EN010162/APP/6.4.5.2B] includes a commitment to a construction worker shuttle bus, which will further reduce trips to the Site. It also confirms that the shuttle bus will operate outside of the SRN peak periods. Paragraph 50 then notes 'Construction worker shifts will be scheduled so that workers are not travelling during the network peak hours of 08:00-09:00 and 17:00-18:00'. Paragraph 49 of the Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] notes that 'Deliveries by HGV will be coordinated through a booking system to avoid travel during the network peak hours, where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible. Additionally, to avoid unnecessary interaction with school users, deliveries utilising large vehicles will be timed as such that they do not arrive between 08:00 – 09:30 and 14:30 – 15:30 if they pass schools; large delivery vehicles will also not be allowed to leave the site during these time periods'. Therefore, there should be limited or no construction vehicle movements during these periods. Further details are then secured by Requirement 14 of the Draft DCO [EN010162/APP/3.1C], which requires a Detailed CTMP for each phase to be submitted to and approved by the County Authority.
5.4.22	No consideration to the form of access appears to have been given. The overall traffic information supplied identifies that some of the accesses trigger the requirement in DMRB CD123 for further assessment of junction type, during both the construction and operational	All accesses are to be retained for the operational phase. Consideration of CD123 has now been given within the revised Transport Statement [EN010162/APP/6.4.14.1A].

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	phase. Where only occurring in the construction phase if there are any temporary accesses, mitigation in the form of traffic management may be acceptable so it should be identified which accesses are proposed to be temporary and those which are to be kept for the operational phase, with a review of the need to provide further assessment in accordance with CD123 and consideration given to the outcome of that assessment.	
5.4.23	Whilst a statement is made that the access drawings are outline drawings and detailed designs will be forthcoming at the appropriate time, NCCs view is that the principle of acceptability needs to be established at this stage. There are a number of accesses, either proposed or amended (with increased usage) which have apparent highway safety concerns. The Nottinghamshire Highway Design Guide (NHDG) states that all new accesses or where there is an increase in use of existing accesses will be supported where there is not a road safety problem or where a road safety problem can be removed (Part 1.2 of the NHDG).	Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] sets out that Road Safety Audits would be prepared for each construction access point being brought into use. Where necessary, site-specific traffic management measures will be put in place to ensure that they are safe during construction and if necessary, operation (via the Detailed Operational Environmental Management Plan. This would include measures such as temporary speed reductions, stop/go boards, temporary traffic signals, road marshals, signage and other types of warning signs

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5.4.24	Visibility splays are not shown on all accesses, and forward visibility (over 1.5x SSD) is not shown on any, meaning that it is unclear whether visibility can be achieved either within highway or within the order limits. These should be established to identify areas where splays are required to be cleared and then maintained, not just during construction but also operational phases, particularly if they fall outside of the highway boundary. These may also require removal of hedgerows. There is a concern that there appear to be a number junctions where splays would fall outside of the DCO extents and therefore it is unclear what powers the applicant would have to clear or maintain them.	Access visibility splays and forward visibility splays are now shown in Appendix D of the ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A].
5.4.25	NCC would require drawings including visibility splays (both junction and forward) at all junctions along with swept paths. All new or amended accesses should be subject to a Stage 1 Road Safety Audit as part of this process.	Access visibility splays and forward visibility splays are now shown in Appendix D of the ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]. The Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] requires that Road Safety Audits will be prepared for each construction access point prior to it being brought into use. Where necessary, site-specific traffic management measures can be put in place to ensure that they are safe during construction and if necessary, operation (via the Detailed Operational Environmental Management Plan. This would include measures such as temporary

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		speed reductions, stop/go boards, temporary traffic signals, road marshals, signage and other types of warning signs.
5.4.26	Other issues include crossroad layouts which are contrary to highway safety principals, access formed at oblique angles to the highway as opposed to 90° which impact visibility, visibility splays not shown at all primary junctions, only one visibility at a secondary access is shown and forward visibility splays not considered at all. Whilst it is noted that the secondary accesses are stated to be used as crossover points with banksmen employed during the construction phase, the TA states that all accesses will become operational accesses and visibility should therefore be established.	The site access designs have sought to achieve a 90° angle with the highway, where practical, however there are locations, where the road geometry and direction of accessing and egressing vehicles make this unsuitable with considerable land-take. In some instances, the alignment has also been informed by internal constraints such as hedgerows, trees, tracks and the Order Limits. Where an access is proposed off a private drive, consideration has now been given to the closest access to the highway and this is presented on the access drawings.
5.4.27	Specific issues that have been able to be identified at this stage include: • visibility from PA10 crosses SA16 which is a safety issue. • SA15 appears to have poor visibility in both vertical and horizontal planes and visibility would conflict with an existing field access. Others show conflicts with proposed	It is not uncommon for visibility splays to cross another access and given the temporary nature of the works, traffic management measures in the Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] and the volumes and frequency of traffic using the accesses, it is considered acceptable. To support this, information is now provided in the Transport Statement [EN010162/APP/6.4.14.1A] that gives further detail on the expected number of vehicles using each access.

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	accesses/crossings and existing roads/accesses. • where new accesses replace existing ones, works to reinstate the replaced access should be included.	
5.4.28	Please note that as previously highlighted, where an access is proposed off a private lane, the closest access to highway is required to be assessed.	The drawings in Appendix D (Site access drawings) of the Transport Statement [EN010162/APP/6.4.14.1A] now include consideration of the closest access to the highway.
5.4.29	The proposed routing only identifies the primary routes and does not identify any secondary routes. It is unclear if this is because it is intended to only use the primary accesses from the highway network and use secondary accesses as crossing points only, but this is not made clear as secondary accesses are referred to as primarily being used as crossing points, rather than only being used as crossing points.	It is the intention to only use the primary accesses from the highway network and use secondary accesses as crossing points only.
5.4.30	The access numbering convention between the DCO and the TA/OTCMP is different, and it is not therefore easy to relate between the documents. This should be rationalised with a	Schedule 7, Access to Works - Part 1: Permanent Means of Access to Works uses the same numbering convention as those used in the Transport Statement [EN010162/APP/6.4.14.1A] and ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] .

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	single numbering convention used throughout to ensure clarity between the documents.	
5.4.31	It appears that there are a number of the access drawings referred to in the DCO where the full extents of highway where works are required is not identified. The applicant should acquire details of the highway boundary and ensure that the drawings are adequate.	The drawings associated with the DCO Schedules are deemed to include the full extent of area required to construct the accesses.
5.4.32	Furthermore, as previously identified it appears that all accesses where works are required are not listed in the schedules. We would also expect drawings to identify all works required such as vegetation management for visibility splays.	The supporting outline design drawings provide the level of information considered appropriate for planning purposes, including visibility splays. These will be developed further at the detailed design stage and agreed with NCC, these will include items such as vegetation management.
5.4.33	Further concerns/inconsistencies are raised within the 'Access' section above.	Please refer to the Applicant's responses above
5.4.34	Schedule 4 Part 2 refers only to temporary passing places, so clarity is sought over where any temporary accesses are proposed that are referred to and under what powers they are to be constructed/improved or maintained during the construction phase.	The streets that are to be permanently altered are set out in the Streets and Access Plans, Part 1 of 4 (EN010162/APP/2.8) [AS-007] document. The streets that are to be temporarily altered are set out in Streets and Access Plans , Part 2 of 4 (EN010162/APP/2.8) [AS-008] . By reference to the streets and access plans ,this includes the temporary passing places. This Schedule relates to Articles 11 (Power to alter layout, etc., of streets) and 12 (Construction and maintenance

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		of altered streets) and sets out where the streets are publicly or privately maintained. Please refer to the Applicant's response to Q2.1.8 in the Responses to ExA's First Written Questions [EN010162/APP/8.22] which suggests that Article 16 was drafted before it had been determined that there were to be no specified temporary means of access. As such, article 16(b) has been deleted, as has the reference to Part 1 of Schedule 6.
5.4.35	A written rationale for provision of passing places is given, but is not clear how it has been applied practically, nor demonstrated in terms of intervisibility. Whilst A14.1.5.6 states that the need for passing places has been based on swept path analysis, this has not been shared. Whilst reference is made to use of existing passing places, the locations of these and spacing between these and/or those proposed has not been confirmed. Figures 14.5 are too small a scale to be able to consider this properly but in the main appear to be existing farm accesses, which are not passing places and are not based on any geometric considerations	It was recognised that the addition of passing places would be required for some route sections in order to facilitate two-way working on these routes. Consideration of passing places has been guided by the HS2 Rural Road Design Criteria. They are proposed along the following sections of road, with a commentary of their location, spacing/visibility and rationale provided in Section A14.1.5.6 ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]. It should be noted that the Order Limits extend along the key routes to the Development from the main road and includes the full width of the adopted highway – road and verge. As such, if through liaison with the Local Highway Authority in agreeing the Detailed CTMP it is found necessary for additional passing places to be created, there is the ability to deliver these within the Order Limits.
5.4.36	It is requested that the applicant provide clear defined information on where both the existing and proposed passing places referred to are,	The Applicant has provided a response on the passing places within Table 2.5 of the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A].

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	in conjunction with evidence on spacing and intervisibility. To assist, NCC consider the standards set out in 'HS2 Rural Road Design Criteria' to be suitable to apply here.	
5.4.37	As highlighted above, the drawings demand too much memory to open simultaneously with other relevant drawings and manipulate/measure and it would be helpful for them to be split.	Please refer to the Applicant's responses to the matter raised at LIR Paragraph Ref. 5.4.3.
5.4.38	Please note that all passing places should be permanent and this should be reflected in the DCO which currently identifies some as temporary and some as permanent.	Please refer to the Applicant's responses to the matter raised at LIR Paragraph Ref. 5.4.17.
5.4.39	Trent Lane/Kelham Lane to the south of South Muskham is not suitable for abnormal loads. More suitable routes are available from the A616 linking to Kelham.	This is acknowledged and the Applicant has provided an abnormal load route survey showing the suitable routes in The Assessment set out in Appendix G of ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]. Wynns Limited, a specialist AIL transportation company has been appointed to advise on AIL movements. Wynns have considerable experience of transporting abnormal loads in the region. It is acknowledged that further detailed discussions and approvals will need to be agreed with NCC and National Highways who provide authorisation for Special Order movements.

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5.4.40	The above document references enforcement and that the contractor is responsible for enforcing it, but as the eventual CTMP is to be based on it, the means to enforce should be outlined.	Enforcement of the approved CTMP would be the responsibility of the local planning authority, who would investigate and initiate enforcement action under their normal planning enforcement powers. The Undertaker is ultimately responsible for any breaches of any of the requirements, and would ensure that the contractor complies with all relevant controls set out in the DCO.
5.4.41	As identified in the comments on the study area, the routing purely from the A1 to the east is not thought to be reasonable.	Please refer to the Applicant's responses to the matter raised at LIR Paragraph Ref. 5.4.17.
5.4.42	The travel plan relates to construction traffic only, which should be stated within the TP. • The construction is only 24 months; however, it is phased. We suggest monitoring tied to phases so that lessons can be applied as the development progresses. • The on-site and off-site locations which shall be served by the proposed shuttle bus should be stated. • Full contact details of the sitewide TPC should be supplied to NCC now. This can be an interim TPC (e.g. a representative of the developer or their agent) until such a time as a permanent TPC is appointed. The TP should commit to updating NCC should the SWTPC's (or any of the Phase TPCs') name or contact details change for whatever reason. (it's not clear if	NCC make a number of useful recommendations for inclusion with the Travel Plan. NCC will have the opportunity to pursue these further as part of the detailed Travel Plan, to be agreed.

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	one TPC will cover all phases; this should be confirmed). • The TPC should commit to liaising with the planning authority (Newark & Sherwood District Council) in addition to NCC (the highway authority). • The amount of car parking that will be provided and the proportion of spaces that will be allocated to motorcycles, disabled users, car share users, visitors and staff is not clear. • A schedule for the implementation of phase Travel Plans should be provided, specifically relating to the number of TPs that will be required and their estimated commencement dates. • Final targets should be provided now, not following the initial staff travel survey, and be based on the estimates provided in the Transport Assessment. • Primary targets should be based upon trip generation. The TA / TS associated with the proposal should have provided an estimate of trips associated with the site, and therefore this is the basis on which targets should be set (i.e. include one table showing the values used in the TA / TS, and a further table showing the target trip generation with the Travel Plan in place). Mode share targets should then be used as a secondary target. • Targets should not be changed or updated without discussion	

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	with, and agreement of, NCC. This should be stated. • The Travel Plan should aim for 100% TP awareness as a secondary target. • In addition to the measures included within the Travel Plan, the following should also be included: • The car share service shouldn't be dependant on the shuttle bus proposals – a car share service should be an independent and key measure (given comments on active modes and traditional PT). • Given the comments made on active modes and traditional PT services, more consideration should be given to firming up off-site shuttle bus commitments, including costs for staff. • On-site showering and changing facilities and lockers should be made available for cyclists (& motorcyclists). • Personal Travel Planning should be offered to any employee who requests it. • Monitoring reports should be published for each phase and supplied to NCC within 1 month of collating data. • In addition to annual travel surveys, we would expect traffic counts to be conducted for each phase. • Firm commitments to all measures, monitoring and targets should be provided (things 'will' happen instead of 'would/should'). • The Travel Plan should commit to remedial measures if the TP	

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	fails to achieve its targets for each phase – i.e. roll lessons into subsequent phases.	
5.4.43	In summary, the Council is concerned about the adequacy of the Transport Assessment, in particular with respect to the study area, which does not consider the impact of construction traffic accessing the site from the West, or adequately take account of different phasing scenarios, in accordance with the principles of the Rochdale Envelope. It also has concerns about the safety, suitability and form of the proposed site accesses as well as passing places, which have not been demonstrated to be acceptable in principle. At this time, it is concluded that the proposal could have a significant negative impact on the highway network and further assessment work, and evidence is needed to address the issues raised in this report.	Please refer to the Applicant's responses above

Table 2-5 Responses to NCC Comments on Public Rights of Way

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<i>5.5. Public Rights of Way</i>		
5.5.1	Public Rights of Way (PROW) are the minor highway element of the public highway network and are afforded the same level of protection and control as the major highway network. As Local Highway Authority, NCC is responsible for managing and protecting the PROW network.	This is noted.
5.5.2	The following comments relate purely to the definitive PROW network, their locations and potential extinguishment or diversion. Comments on the visual impacts or landscape are not part of this consideration (such issues will be addressed by NSDC), nor are any comments provided on the permissive network proposed by the applicant, although it is appreciated that permissive paths are proposed for the benefit of the public. The applicant is aware of the legal process available to ensure that they cannot be claimed as public in the future and remain permissive and temporary, unless in decommissioning, the routes are dedicated formally by the landowner at that time.	This is noted.
5.5.3 & 5.5.4	Generally, the PROW network has been considered and managed well, with the majority	Diversions are proposed on eight PROW, using seven diversion routes. Seven of the eight PROW will be diverted during the operational phase of the Development and will have the diversion

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	of paths not physically affected by the development, which is appreciated. Only seven paths are proposed to be diverted, and these are commented on below, with one temporary closure.	works completed prior to closure of the baseline route. The final route is a bridleway (NT Sutton on Trent BW14) which will be temporarily diverted during the part of the construction and decommissioning phase when works are present on the route, but will otherwise remain open.
5.5.5	The following comment relates to Technical Appendix A18.1 of the ES titled Outline Recreational Routes Management Plan (Document Reference EN010162/APP/6.4.18.1): • A18.1.4 - Please note the following: A cycle track is not part of the RoW network and sits within the adopted highway envelope if properly recorded. A Restricted Byway is for all public access with the exception of road legal motorised vehicles • A18.1.5.2 Signage - Signage, detailed plans of dates etc should be in consultation/agreement with NCC (not NSDC) as the highways authority to ensure awareness and management with other closures in the area that may impact • A18.1.5.3. Management of closures - Does the DCO give the ability to arrange temporary closures with the alternative route that is not on a highway. This is not normally the case unless the landowner agrees to take on the responsibility for the safety of the public when on a route that is not on a highway. • A18.1.5.6 Diversions - Once a path is diverted under a legal order (not a temporary order) it is	A18.1.4 - Definitions within ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1B]. have been taken from the Highways Act 1980 and the Countryside and Rights of Way Act. There are no cycle tracks within the Order Limits, and not proposed by the Applicant, so this description has been removed from table A18.1.2. The description provided for the Restricted Byway is taken from the Countryside and Rights of Way Act and does not allow access to 'mechanically propelled vehicles'. A18.1.5.2 - This has been updated within ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1B]. A18.1.5.3 - Article 13(1) of the dDCO provides that the applicant may temporarily (inter alia) close and/or divert any public right of way for the purposes of the authorised development, i.e. construction, operation and decommissioning. Without prejudice to the generality of Article 13(1), 13(3)(b) provides that the applicant may temporarily (inter alia) close and/or divert the PRowS set out in Schedule 5 Part 2, to the extent specified in column 3 of the table in Part 2. Before using the general powers provided by

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	permanent. The statement that the path may be moved back on decommissioning is unexpected. We would question whether the DCO would allow this to happen. This is not the case under for any diversions under Town and Country Planning Act 1990 or Highways Act 1980 so this should be clarified. • A18.1.5.7 Enhancement - While the interpretation boards and picnic area are recognised as an enhancement, the location of these is paramount as is the clarification of maintenance during the development and what happens on decommissioning. • 18.1.5.8 Safety measures - We are pleased to see that all measures are being taken to keep the public safe and avoid the use of limitations such as stiles or gates on the RoW network	article 13(1), the applicant must obtain the consent of NCC and NCC may attach reasonable conditions to any such consent. For the PROWs included in Schedule 5, Part 2, the applicant must consult NCC for a period of not less than 28 days (but NCC's consent is not required). Where a temporary alternative route is proposed that does not lie within the existing adopted highway, this would be implemented only where the necessary land rights have been secured through agreement with the landowner. In this case, responsibility for maintenance and public liability resting with the Applicant rather than the highway authority. A18.1.5.6 - Diversions implemented during the operational phase of the development will remain permanently diverted and will constitute the legal PRoW, unless and until a mechanism outside the DCO is used by NCC to re-divert them to their original alignment following decommissioning (for example, using its statutory powers provided by section 119 of the Highways Act 1980). Prior to issue of the final DRP, the Applicant will carry out a review of the Public Rights of Way (PROWs) within the Order Limits, in consultation with Nottinghamshire County Council. Should it be deemed that any PROWs would better be re-located, whether back to their pre-Development locations or otherwise, the Applicant will apply for these changes to be made through the required process at that time. ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1B] has been updated to reflect this. A18.1.5.7 - The final locations of picnic areas, other benches, and interpretation boards will be set out within the final RRMP.

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		Responsibility for the maintenance of the enhancement measures will lie with the Applicant. All enhancement measures will be removed upon decommissioning of the Development. A18.1.5.8 - This is noted.
5.5.6	The following comment relates to Technical Appendix A4.1 of the ES titled Public Rights of Way Strategy (Document reference – EN010162/APP/6.4.4.1): • A4.1.5 Approach to diversions of PRow - The DCO (Sec 14(4) & (5)) states that the order shall provide enough detail for the surveying authority (NCC) to modify the definitive map of rights of way. The specific details of the information required must be clarified as the details currently in the DCO is not sufficient. • A4.1.7 Temporary closures - See comments stated in RRMP above (A18.1.5.2 Signage)	A4.1.5 - Article 14(5) sets out that the plans and statement of modifications lodged are deemed to be an order modifying the definitive map and statement made under section 53(3)(a) of the Wildlife and Countryside Act 1981. As such, the plan and statement must accord with the Act and any Regulations made thereunder, namely The Wildlife and Countryside (Definitive Maps and Statements) Regulations 1993. The 1993 Regulations specify the form a modification order must take (Regulation 4), with the detail being set out in Schedule 2 to the 1993 Regulations. As such, the applicant does not consider that the DCO requires amendment in this respect and please note that this follows precedent DCO drafting. Details of changes to PRow can be seen on the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A]. A4.1.7 - Please refer to the response above.
5.5.7	Comments on proposed diversions (Chapter 18 – Recreation):	Please see the responses below.

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5.5.7 - Diversion No 1	Averham FP 6 — Both the exits to the road should be retained as part of the diversion	Both exits to the A617 have been retained. Details of changes to PRoW can be seen on the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A] .
5.5.7 - Diversion No 2	Carlton on Trent FP 6 & 10 — This is a diversion of FP 6 and the almost full extinguishment of FP 10 (the remaining 20m being the link to Ossington Road from the diverted FP 6?). Please can this be clarified. The diversion of FP 6 should be extended to meet the end point of FP 10 to provide a safe exit to the same point without having to use the road	Footpath Diversion 2 provides an alternative route for both NT Carlton-on-Trent FP6 and NT Carlton-on-Trent FP10. NT Carlton-On-Trent FP10 would have 330 m of the 350 m route closed with the remaining 20 m section providing a connecting link for Footpath Diversion 2 and continued access to Ossington Road. The diverted route would continue to provide a connection between the unnamed road to the east, Ossington Road, and the wider PRoW network. The proposed road access point for Footpath Diversion 2 provides users with closer access to Ossington Road, or connects to New Permissive Footpath 5, which provides a safer, off-road route to connect to the wider PRoW network to the south. New Permissive Footpath 5 also creates a 2 km circular route in combination with the diverted routes and NT Carlton-on-Trent FP11. Details of changes to PRoW can be seen on the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A].
5.5.7 - Diversion No 3	Laxton & Moorhouse FP 11 — Acceptable	This is noted.
5.5.7 - Diversion No 4	Weston FP10 — Acceptable	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
5.5.7 - Diversion No 5	Eakring FP 13 — The diversion will connect to FP 15 & 14 not FP16	This has been updated with ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18B] and ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1B] .
5.5.7 - Diversion No 6	Eakring FP 14 — Acceptable	This is noted.
5.5.7 - Diversion No 7	Kelham FP 7A — Acceptable	This is noted.
5.5.8	Although not proposed to be diverted, clarity is sought with respect to Bathley FP8, which is located partially within the land set aside for the community orchard. A short section of the footpath crosses through the orchard on the northern edge. The planting should be set back from the footpath to ensure there is no encroachment. The Outline LEMP should specify the width along the footpath which will be safeguarded from planting or grassland maintenance.	There will be no change to NT Bathley FP8 and no planting will take place on the route. Data on the locations, lengths, and widths of PRow within and surrounding the Order Limits was sourced from the definitive map, as provided by NCC. It is not expected that the minimum widths of PRow will be impacted.
5.5.9	It is accepted that there will be minimal disruption to other RoW during construction, operation and decommissioning but these seem to be	This is correct. As outlined in ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1B] , local closures may occur where works pass a small section of the route. In these circumstances, the route

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	understood and plan to be managed with minimal disruption to the access.	would remain open with a localised diversion in place when works are occurring. Every reasonable effort will be made in order to minimise disruption to users.
5.5.10	Generally, the proposal has managed the RoW to an acceptable standard and subject to clarification of the issues raised above, the impact on the network would be neutral.	This is noted.

Table 2-62-6 Responses to NCC Comments on Minerals and Waste Planning

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>5.6. Minerals and Waste Planning</i>		
5.6.1	Local Policy: • Nottinghamshire and Nottingham Waste Local Plan - o SP1 – Waste Prevention and Re-Use • Nottinghamshire Minerals Local Plan - o SP7: Minerals Safeguarding, Consultation Areas and Associated Mineral Infrastructure	This is noted.
5.6.2	National Policy:	This is committed through the Site Waste Management Plans proposed for each phase of the Development as part of the ES

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
5.6. Minerals and Waste Planning		
	• EN-1 states that proposals should ensure that sustainable waste management is implemented through the waste hierarchy and that disposal of waste should only be considered where other waste management options are not available. The applicant should set out the arrangements that are proposed for managing any waste produced and should include information on how re-use and recycling will be maximised in addition to proposed waste recovery and disposal.	Volume 4, Technical Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B], ES Volume 4, Technical Appendix A5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5. 5A] [REP1-034], and ES Volume 4, Technical Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5. 6A] [REP1-036], each of which are secured by DCO Requirement.
5.6.3	NCC is the Mineral and Waste Planning Authority for the proposal site and provides comments in relation to the impact of the proposal on minerals extraction and waste management. Minerals	This is noted.
5.6.4	NCC considers that the assessment methodology for assessing impacts on minerals by the proposed development is adequate. The applicant for the DCO has undertaken a Minerals Resource Assessment to consider the impacts on the sand and gravel and brick clay resource as well as the permitted Egmonton Oil well sites. As noted in our pre-application comments, we agree with the conclusion that	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>5.6. Minerals and Waste Planning</i>		
	the development will not cause a sterilisation of the mineral resources as the development is of a temporary nature with all elements being, or able to be, removed following the decommissioning of the proposal site. NCC considers that the assessment work undertaken by the applicant to assess the impact on minerals is sufficient and does not have any outstanding concerns and thus the impact would be considered neutral.	
5.6.5	The applicant has assessed the impacts on waste within Chapter 16 of the ES (Miscellaneous Issues). NCC raised previously that the applicant should consider a worst-case scenario whereby waste, particularly at the decommissioning stage, may need to be disposed of to understand potential impact on landfill need and capacity. NCC also requested the potential cumulative impacts to be assessed for this application with other similar developments within the area. The applicant addresses these comments in paragraph 233 – 237 of section 16.7 in Chapter 16. It states that since a recycling industry for PV solar panels will likely be well developed by 2069, the time of decommissioning, and that additional landfill	The Applicant considers that the scenario where appreciable quantities of waste would be landfilled at decommissioning is not a realistic worst-case and should not require assessing.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
5.6. Minerals and Waste Planning		
	capacity will be made available or alternatives developed, the effect of the development on landfill capacity is negligible and therefore not significant.	
5.6.6	Whilst NCC agrees that it would be preferable for materials to be handled higher up the waste hierarchy and so recycled, the industry and technology at the scale required, for this project and others in the area, is currently not established. As noted in the Solar Roadmap: United Kingdom Powered by Solar (June 2025) by the Department for Energy Security & Net Zero, the industry for recycling solar panels is small, with advanced techniques which recover >65% of a panels mass and value at a very small scale. Significant investment and advancement are therefore required, without such there will be a large volume of waste at the decommissioning phase. As the applicant identifies, the landfill capacity in Nottinghamshire is limited, however the assumed ability to add further capacity for landfill, particularly non-hazardous, in Nottinghamshire is constrained due to the geology of the area and wider environmental constraints. Other similar applications for DCOs,	As noted in paragraph 235 of ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059], "The waste assessment for Gate Burton Energy Park (PINS Project Reference EN010131, document EN010131/APP/8.33), set out why a meaningful assessment of potential waste arisings against existing landfill capacity is not possible." ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] does not assume an ability to add further capacity to landfill. As noted in paragraph 236, the Nottinghamshire and Nottingham Waste Needs Assessment makes the prediction that there will be no capacity for any further CD&E waste before the end of the plan period (which is 2038, 30 years earlier than the Development's expected decommissioning date). The only reasonable assumption (based on NCC's document) is therefore that either additional capacity will be made available, or alternatives to landfill will be developed to meet capacity. It would be consistent with recent practice, waste policy and sustainable development for alternatives to landfill to be developed to meet capacity, and this is what has been assumed in ES Chapter 16.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>5.6. Minerals and Waste Planning</i>		
	including the Gate Burton Energy Park and One Earth Solar Farm, have therefore considered an absolute worst-case scenario to consider the potential impacts on waste on landfill capacity within the region.	As such, the Applicant considers that the waste assessment methodology and mitigation measures are appropriate. There would be unlikely to be any adverse impacts on existing waste facilities.
5.6.7	Other applications have also considered the cumulative effect of the impacts on waste from proposals within the area, especially as they are anticipated to be decommissioned on a similar timescale. The applicant for this DCO does not appear to have undertaken such an assessment.	That is correct (see previous response).
5.6.8	NCC would therefore consider that the applicant has not fully assessed the impacts of the proposal on waste, in terms of landfill and cumulative impacts. NCC considers that the applicant should have considered a worst-case scenario in that waste, particularly at the decommissioning phase, may need to be landfilled. The cumulative impact of this proposal with other similar schemes in the area should also have been assessed. This would have ensured that the impact of the proposal on landfill capacity, with this identified as the sensitive receptor for waste, has been fully considered and assessed if capacity to enable	The Applicant has assessed a realistic worst-case scenario insofar as current data and projections of that data allow. NCC refers to other applications, including Gate Burton, but the waste assessment for Gate Burton Energy Park (PINS Project Reference EN010131, document EN010131/APP/8.33), set out why a meaningful assessment of potential waste arisings against existing landfill capacity is not possible. The Applicant has set out why disposal to landfill at decommissioning is not a realistic scenario and hence has not been assessed.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
5.6. Minerals and Waste Planning		
	the recovery and recycling of solar panels is not developed.	
5.6.9	It is therefore concluded that the impact on waste management is uncertain at this stage, pending completion of the recommended assessment work as described above, but that the project has the potential to have a negative impact upon future landfill capacity if capacity to enable the recovery and recycling of solar panels is not developed.	It is true that if decommissioning waste goes to landfill, then there would be a negative effect on landfill capacity at that time, regardless of what landfill capacity exists at that time (which it is not possible to assess). However, this is not a realistic scenario.

Table 2-7 Responses to NCC Comments on the DCO

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
6. Development Consent Order		
6.1	NCC has reviewed the draft DCO and has the following comments to make, however these are not exhaustive and NCC may have further comments to make during the examination process.	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Part 3 – Streets</i>		
6.2	The County Council is the Local Highway Authority (LHA) for the order limits of the proposed project. The following comments are made with respect to PART 3 of the Draft DCO (STREETS).	This is noted.
6.3	Article 10 allows the undertaker to perform street works on any of the streets specified in Schedule 3, subject to the NCC Permit Scheme Order 2020. This will ensure the LHA is able retain coordination and control of road works to reduce disruption for road users.	This is noted.
6.4	Article 11 allows the undertaker to carry out alterations or works to any of the streets specified in Schedule 4. Please note that the alterations described in Schedule 4 are not currently agreed because the transport assessment methodology is yet to be agreed (see Section 5.4). Furthermore, NCC would require such works to be subject to full technical approval from the street authority with the costs to the street authority to be covered by the undertaker.	As set out in the Explanatory Memorandum [EN010162/APP/3.3B], this Article is necessary because, in order to construct, operate, maintain and decommission the Authorised Development, the undertaker will need to alter street layouts and establish suitable accesses to ensure that the Authorised Development can be accessed effectively while ensuring there is minimal disruption to the local highway network. Article 11 is substantially as found in Article 9 of the Longfield Solar Farm Order 2023, The West Burton Solar Project Order 2025, The Sunnica Energy Farm Order 2024, The Mallard Pass Solar Farm Order 2024 and The Cottam Solar Project Order 2024.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
6.5	Schedule 4 Part 2 (Temporary Alteration of Layout) refers to temporary passing places – these should be permanent and therefore included at Part 1 (Permanent Alteration of Layout).	It is proposed that the passing places be retained for the operational phase along roads that are only single lane. On roads that have two lanes, it is proposed that they be reinstated following the construction phase. Permanent passing places for the operational phase only (and are included in Schedule 4, Pt1 - Article 11&12) on these roads: • Moorhouse Road • Weston Road • Ossington Lane • Carlton Lane Temporary passing places to be reinstated after construction (and are included in Schedule 4, Pt2 - Article 11&12) on these roads: • Newark Road • Maplebeck • Caunton Road • Ossington Road As such, the applicant considers that reference to temporary passing places in Schedule 4 Part 2 (Temporary Alteration of Layout) is appropriate.
6.6	Article 12 states that alterations to each of the streets specified in Schedule 4 would be completed to the reasonable satisfaction of the	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	street authority. This is agreed to be necessary.	
6.7	Article 16 allows the undertaker to form and lay out temporary and permanent means of access at the locations described at Schedule 6. The proposed accesses are not currently agreed, as explained at Section 5.4. Furthermore, such works should be subject to full technical approval from the street authority with the costs to the street authority to be covered by the undertaker. Please note that Article 16 refers to Part 1 (permanent access) and Part 2 (temporary access) of Schedule 6, but Schedule 6 appears to be a single entity with no parts.	The Applicant's response to the proposed accesses (LIR Paragraph Ref. 5.4.17) is set out within Table 2-4 of this Report.
6.8	Article 13 allows the undertaker to temporarily close the PROWs described in Schedule 5. It is noted that this would be subject to first consulting the street authority. Where a PROW is to be permanently closed under Article 14, Paragraph 4 and 5 states that the diversion order shall provide enough detail for the surveying authority (NCC) to modify the definitive map of rights of way. The specific details of the information required must be clarified – this could be set out within the oCTMP or oPROWMP.	Article 14(5) sets out that the plans and statement of modifications lodged are deemed to be an order modifying the definitive map and statement made under section 53(3)(a) of the Wildlife and Countryside Act 1981. As such, the plan and statement must accord with the Act and any Regulations made thereunder, namely The Wildlife and Countryside (Definitive Maps and Statements) Regulations 1993. The 1993 Regulations specify the form a modification order must take (Regulation 4), with the detail being set out in Schedule 2 to the 1993 Regulations. As such, the applicant does not consider that the DCO requires amendment in this respect and please note that this follows precedent DCO drafting.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
		Details of changes to PRoW can be seen on the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A] .
6.9	Article 17 allows the undertaker to temporarily place traffic signs and signals in the extents of the road as described in Schedule 8 and to impose traffic regulation measures, with the written consent of the traffic authority. NCC would seek clarity on the proposed procedure for consultation and approval of any TTRO and recommend that this is agreed with NCC and described within the oCTMP. Whilst the requirement to publish the proposed measure in one or more local newspaper is noted, it is standard practice within Nottinghamshire for a bulletin to be issued to relevant stakeholders. NCC would request the cooperation of the undertaker in this respect, by either directly issuing the bulletin itself or by supplying the dates/times, locations and diversions and contact numbers for the LHA to issue a 'roadworks bulletin'.	The Applicant notes this point. It suggests that the commitment to notify relevant stakeholders is set out within the Outline CTMP. A commitment to this effect has been added to the Deadline 2 version of the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] , but the Applicant would welcome further discussion with NCC on this matter.
6.10	In addition, Schedule 1 (Authorised Development) describes the works (i.e., 'Works No.8') to facilitate access to Work Nos. 1 to 7. This includes creation of accesses, creation and maintenance of visibility splays, works to widen and surface existing highways, and	The Applicant's response to the visibility splays and swept path is set out within Table 2-4 of this Report.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	making passing places. It is unclear if Works No.8 could be delivered within the order limits as the visibility splays are not drawn and as such the extents to which the maintenance is required is unknown. As the DCO only confers powers within the order limits, it is unclear under what powers the visibility splays would be maintained, should they exceed the order limits. This same principle also applies to the widening of carriageways as without swept paths it is not known what maintenance is required and whether this is achievable within the order limits.	
Schedule 2 – Requirements		
6.11	It is noted that the 'county authority' is the discharging authority for several of the requirements in Schedule 2 including: Fire Safety Management (7) (via Nottinghamshire FRS), Archaeology (11) and Construction Traffic Management Plan (14).	This is noted.
6.12	NCC recommends that it is also responsible for discharging Surface and Foul Water Drainage (10), in its capacity as the Lead Local Flood Authority, and Recreational Enhancement and Routes (18), in its capacity as the Local Highway Authority which is responsible for management of the Public Rights of Way	The Applicant agrees to this and has updated this in the Deadline 2 version of Draft Development Consent Order [EN010162/APP/3.1C] .

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	(PRoW) impacted by the project. It is understood that in all other cases the district 'planning authority' would be the discharging authority. NCC may wish to comment further on the wording of the requirements during the examination.	
6.13	In Nottinghamshire, proposals are being developed to reorganise local government which, if implemented, would result in a single tier of local government. Therefore, the dDCO should enable any of the requirements in Schedule 2 to be discharged by a superseding local authority, if necessary.	Noted and agreed.
<i>Schedule 14 – Procedure for Discharge of Requirements</i>		
6.14	NCC notes that where an application to discharge a requirement is made a fee is to apply and must be paid to the relevant discharging authority for each application. It is noted that in relation to those requirements where NCC would be the relevant planning authority, a fee of £2535 applies for the first application for each requirement. This includes 7 (fire safety management), 10 (surface and foul water drainage), 14 (construction traffic management plan) and 18 (recreational enhancements and routes). NCC would request this fee also applies to 11	The Applicant agrees to this and has updated this in the Deadline 2 version of Draft Development Consent Order [EN010162/APP/3.1C] .

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	(archaeology) given the scale of work involved and considers the proposed fee of £145 to be too low for this requirement. The costs to the council should be adequately covered and the fees should be index linked from the date of the DCO.	
6.15	NCC considers that notification of a decision within 10 weeks as a standard approach is insufficient. NCC is particularly concerned with the resourcing of such requirements and therefore consider that a more appropriate default period equating to Major Environment Impact Assessment development for a planning application of 16 weeks is more appropriate. Whilst NCC note that Schedule 14 includes for the ability to agree an alternate period, the expectation for 10 weeks would be set by its inclusion in the standard wording. The project is significant in size and scale and the information submitted for many of the requirements is likely to involve a significant amount of information and an appropriate time period must be afforded for NCC to consider this, including time to consult with other relevant organisations. This issue would be compounded by the combination of other NSIP projects within the county, should they gain development consent. These projects follow a	The Applicant has responded to this matter in Section 2.9 of the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A].

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	similar timeline and will place cumulative pressure on the statutory functions of the planning department.	

Table 2-8 Responses to NCC Comments on the Summary

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>7. Summary</i>		
7.1	This LIR has undertaken an assessment of the likely issues and impacts that NCC considers will arise from the construction and operation of the Great North Road Solar and Biodiversity Park with respect to its areas of expertise and statutory responsibility. This LIR therefore does not cover all relevant environmental matters and should be read alongside Newark and Sherwood District Council's LIR, as well as representations made by other statutory bodies including the Environment Agency, Natural England and Nottinghamshire Fire and Rescue Service.	The Applicant notes these comments.
7.2	This LIR has identified several negative or inconclusive effects at this stage which NCC believes should be further addressed by the	The Applicant notes these comments and has responded to the matters summarised in the following tables within Section 2.2 of the Report:

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	applicant, through further assessment work, evidence and mitigation measures. The main areas of concern relate to impact upon traffic and local flood risk, which in our view have not been assessed to the required standard or adequately mitigated.	• Table 2-3 Flood Risk and Drainage • Table 2-4 Traffic and Transport
7.3	NCC also remains concerned about the cumulative impact upon the local landscape and the loss of agricultural land arising from this proposal and other nationally significant proposals for ground mounted solar within the county, further evidence on which is covered in the NSDC LIR.	The Applicant notes these comments and has responded to the matters summarised in the following tables within Section 3.2 of the Report: • Table 3-1 Landscape and Visual Impacts • Table 3-6 Agricultural Land Classification
7.4	NCC is willing to continue to work with the applicant during the examination period to overcome the issues raised within this report as far as possible and to agree the content of the outline management plans and draft DCO. The applicant should report progress on these matters through a Statement of Common Ground with NCC, which will be updated throughout examination.	The latest position between the Applicant and NCC is set out within the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A].
7.5	NCC may wish to make further representations as appropriate during the examination and at issue specific hearings particularly with regard to environmental matters discussed within this	The Applicant notes these comments.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	report. Therefore, the comments contained above are provided without prejudice to the future views that may be expressed by the County Council as an Interested Party in the examination process.	

3 RESPONSES TO NEWARK AND SHERWOOD DISTRICT COUNCIL'S LOCAL IMPACT REPORT

3.1 OVERVIEW

3.1.1 The following topics were raised by NSDC in their LIR:

- Landscape and Visual Impact (Including Residential Amenity)
- Biodiversity (including Net Gain) and Arboriculture
- Noise and Vibration
- Air Quality
- Ground Conditions and Contamination
- Agricultural Land Classification
- Built Heritage
- Socio Economics
- Summary and Conclusions

3.1.2 The tables below provide the Applicant's response to these topics arranged under the headings listed above, supported by identification of sub-themes for clarity and ease of reference.

3.2 RESPONSES TO NSDC'S LIR

Table 3-1 Responses to NSDC Comments on Landscape and Visual Impact

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>LVIA Methodology</i>		
8.1 – 8.3	8.1 The Landscape and Visual methodology are set out in Technical Appendix A7 – LVIA Methodology. In this regard, we would draw attention to the following points: The future baseline at A7.Paragraph 2.2.9 sets out that 'The future baseline consists of changes to the landscape which are considered certain or likely to happen – including consented proposals which are not yet present in the landscape but are expected to be constructed.' The level of Effect and Significance is set out at A7. Paragraph 2.6.36 which sets out that 'Where the effect has been classified as Major or Major/Moderate this is considered to equivalent to likely significant effects referred to in the EIA Regulations. Where 'Moderate' effects are predicted, professional judgement is applied to ensure that the potential for significant effects arising has been thoroughly considered.'	NSDC accept that the threshold for significant landscape and visual effects has been clearly defined at paragraph 36 of ES Volume 4, Appendix 7.2: LVIA Methodology [EN010162/APP/6.4.7.2] [APP-209], partly contradicting their position as set out at 2.3.6 of the Statement of Common Ground (SoCG) [REP1-051]. See also below in relation to paragraph 8.24 of the NSDC LIR. NSDC refer to their Summary of Verbal Representations from ISH1 [REP1-076] in relation to this matter. Paragraphs 20-26 of that document relate to cumulative landscape and visual impacts. The Applicant has responded to the points raised in these paragraphs within Appendix 3 to the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068] and in the responses to LIR 8.27-8.30 and 8.34 below. Agreement noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	The approach to Cumulative Assessment is set out in A7 Paragraph 2.9 and although it set out a general approach to the assessment which is acceptable, it does not advance the assessment at the strategic level which we now consider is required. This is set out in our Written Summary of Verbal Representations at Issue Specific Hearing 1. <u>Visualisations</u> 8.2 The Visualisations have been prepared in accordance with the accepted guidance and provide clear information. <u>Worst Case Design Scenarios</u> 8.3 A7 Paragraph 1.4.16 sets out the assumptions made at post-decommissioning stage and include: • That permissive rights of way created as part of the Development would be removed. This element requires further consideration and is referred to further down in section 8.12. • Diversions to ProW created as part of the Development would remain in place. Circumstances may occur where the diverted ProWs are no longer in the most optimum position once the solar array have	The Applicant's response is provided in section 8.12. Such circumstances are not anticipated, however, the ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [APP-207] sets out that, should any altered PRoW be proposed to be relocated to their current positions

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	been removed and therefore this assumption should be reconsidered. Woodland and hedgerows (except those created to form a second hedge alongside a permissive route) will be retained, as will the community orchard, but in other areas the land would be restored to agriculture. This assumption becomes relevant for reconsideration should the approach to permissive routes and their retention, particularly as part of the Circular Walk, is reconsidered.	at/following decommissioning, this would occur using the normal process for applying for changes to PRow. This would change the future scenario back to the current baseline, and there would be no significant effects. The control of permissive routes beyond decommissioning would revert to the landowners at that time, hence the Applicant cannot commit to the permissive routes being retained beyond decommissioning.

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8.4 - 8.13	<u>Landscape and Visual Assessment</u> 8.4 The following comments are made in respect of the Landscape and Visual Impact Assessment as presented within Chapter 7 of the Environmental Statement. <u>Study Area</u> 8.5 The Study Area as defined at Paragraph 7.1.5 is acceptable with the exception of Cumulative. This may need to be clarified, in this section or a later location in the chapter. <u>Assumptions and Limitations</u>	As set out at 7.1.5 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] the LVIA study area was agreed by NSDC after publication of the PEIR. The cumulative projects search area and long list has also been agreed by NSDC as set out at in Table 2.2 of the ES. This point is not stated as an assumption because no such assumption was made. The effects on residential amenity were assessed from the nearest public locations and as part of that assessment it was judged that there was no need to undertake visits to private property.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	8.6. At Paragraph 7.1.6.20 it is set out that no visits were made to private properties. Although this section does not review the RVAA, note should be made that there is therefore an assumption that all relevant views could be assessed from accessible public locations. 8.7. It is our understanding that Assessment should be based on the actual Definitive Map not 'what was seen on the ground' Clarity should be given where there is a difference accompanied by an explanation of the assessment made. <u>Assessment Scenario and Potential Effects</u> 8.8. At Paragraph 7.1.7 the typical scenarios Construction, Operation and Decommissioning are set out. It is understood that the average lifespan of solar panels are 25-30 years although at this time they are likely to be performing at only 80% efficiency. It is not clear if the LVIA accounts for replacement of the solar arrays and the potential impacts of this phase. <u>Consultation</u>	During site work it was observed that a small number of short sections of public rights of way are differently routed on the ground compared to the routes indicated by the Definitive Map. In cases where it was readily apparent that the public are using a slightly different route (usually because signage, gates, gaps through hedges or stiles were in different places, or the Definitive Map route was inaccessible or unclear), the assessors walked the route that is evidently used by the public. This will have made limited difference (if any) to the assessment outcomes given the infrequent occurrence and limited extent of diversions and means that the assessment of visual effects provided reflects the realistic experience of the changes to views for the public. Replacement of solar arrays is not a phase of the development that requires discrete assessment. Replacement of individual panels would take place as required as part of routine maintenance during operation and is covered within consideration of the relevant operational phases. Up to 10% of the solar PV panels are assumed to require replacement during the operational phase, on an as-required basis following routine inspections. Agreement noted. The Circular Walk is assumed not to remain in place after decommissioning, and the assessment provided in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] has been undertaken on that basis.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	8.9. We agree with the consultation set out in Table 7.1, relevant to NSDC and Landscape and Visual Matters <u>Landscape and Visual Baseline</u> 8.10. The Landscape and Visual baseline information is set out within sections 7.4 and 7.5. 8.11. In Table 7.3 Embedded Mitigation Measures it is set out that the Solar Panels would be mostly within larger scale, flatter arable landscapes. The Landscape Character of the study area is largely undulating, particularly in Mid Nottinghamshire Farmlands, this is recognised on Figure 7.2 Landscape and Topography and also shows that the arrays are on mid ground levels between 81-41m AOD. 8.12. Table 7.4 Embedded Enhancement Measures refers to the Circular Walk and that it comprises a mix of existing PRow, diverted PRow and permissive routes. Clarification is required on how the Circular Walk remains in place post decommissioning as these permissive routes will be closed. 8.13. Referencing 'Interpretation' the addition of interpretation that describes the solar farm	As paragraph 327 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] makes clear, description of the project is not the only form of interpretation envisaged.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	itself is not considered to be an enhancement to the 'Cultural' aspects of the landscape value.	
<i>Assessment of Likely Landscape and Visual Effects</i>		
8.14 – 8.26	8.14. Overall, the Assessment process is clear and transparent and is supported by appropriate figures, appendices and makes reference to the applicable plans. Key points are set out below. 8.15. It is appropriate to consider the commissioning and decommissioning across multiple locations simultaneously, as set out in Paragraphs 7.7.2.103 and in 7.7.2.104, that there are three key stages of assessment, these being, Construction and early operation, Operation, and decommissioning and After decommissioning allowing for a 'worst case scenario' assessment at all stages. However, as raised previously, the replacement of the solar arrays is no considered in these phases. 8.16. NSDC agree the effects are permanent as they would last longer than 25 years as set out within Paragraph 7.7.3.106. <u>Changes on Landscape Fabric</u> 8.17. Tree losses are set out in this section, 98 trees are affected by the works, 28	Agreement noted. Replacement of solar arrays is not a phase of the development that requires discrete assessment. Replacement of individual panels would take place as required as part of routine maintenance during operation and is covered within consideration of the relevant operational phases. Up to 10% of the solar PV panels are assumed to require replacement during the operational phase, on an as-required basis following routine inspections. Agreement noted in relation to effects on landscape fabric as set out in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A]. Agreement noted in relation to ZTV methodology being appropriate and main extent of visibility arising within 1-2km of the solar areas. Agreement noted with ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] in relation to effects on landscape character. Agreement noted in relation to the viewpoint selection listed in Table 7.5 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A].

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	individual trees and 70 trees which are part of groups. 11 of these trees are Cat. A. Hedgerow losses amount to 1,308m of permanent hedgerow removals. 8.18. Compensation includes 31 ha of new woodland, 8.5ha of woodland pasture creation, 50km of species rich hedgerow creation and scattered individual trees. 8.19. It is judged that overall, these effects are not significant and that they will have an increasing benefit. This benefit is clear in terms of the landscape fabric in isolation. <u>ZTV</u> 8.20. The methodology is acceptable, and the extent is agreed 'that visibility occurs within 1-2km of the solar panel areas.' <u>Landscape Assessment</u> 8.21 Only Mid Nottinghamshire Farmlands/Village Farmlands with Ancient Woodlands receives a Major/Moderate and Adverse and Significant effect, as noted in the table presented at paragraph 8.21 of the LIR. 8.22 The remaining LCAs, even those which include development, are not judged to receive	This is a misinterpretation of paragraph 48 of ES Volume 4, Appendix 7.5: Non-Significant Effects [EN010162/APP/6.4.7.2] [APP-212] referred to. That paragraph is simply describing the effects on receptors that follow as being "<i>not significant and Moderate/minor or less</i>" – because there are no Moderate effects identified in the group of visual receptors reported in Appendix A7.5. It is not an indication of a revised significance threshold. The significance threshold is set out in the LVIA methodology (as noted by NSDC at section 8.1 of the LIR – see above) and clearly used in the assessment which identifies all Moderate visual effects as not significant (e.g. visual receptor Groups A, B and E after decommissioning, and Group D during operation and decommissioning). The summary table of visual effects provided by NSDC in the LIR also identifies the majority of Moderate effects as not significant except for effects on Group B road users, Group C PRoW users and Group C road users during construction and early operation. This appears to partly contradict their position in relation to all Moderate effects being considered to be significant as set out at 2.3.6 of the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2A]. The summary table provided by NSDC in the LIR only differs from the assessment in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] as set out in the table below. As the summary table is not introduced and no explanation is provided in the LIR in relation to these differences, it is not clear whether they are transcription errors and the summary table in the LIR is intended to reproduce the findings of the LVIA; or if they indicate

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses																							
	significant effects, despite some of those effects being Moderate and adverse. <u>Visual Assessment</u> 8.23. The following comments are made on the visual assessment, but exclude the points on cumulative effects, which are considered later. In this regard, Consultation has been open and responsive with regard to the viewpoint analysis. The views have been discussed, and further refinement has been done through the process to reflect consultee requests. Selected views represent the receptor groups and Figure 7.6 represents the scale of change along the PRowWs prior to mitigation, representing a range of visual receptors. 8.24. Table 7.5 sets out the Viewpoint Analysis Summary for non-negligible scale of effects. Section 7.7.10 sets out the Visual Effects across the Grouped Visual Receptors. The Visual Assessment s differs from the Landscape Assessment in that it sets Minor/Moderate as not significant, rather than potentially Moderate effects. This is confirmed in TA7.5.3.48. Where visual receptors are judged to experience Moderate effects, at any phase, these are considered significant. The	differences of opinion in relation to the effects of the Proposed Development. <table><tr><th>Receptor Group</th><th>Phase</th><th>NSDC LIR</th><th>Applicant LVIA</th></tr><tr><td>Group B: Caunton to A617 – PRowW users</td><td>After decommissioning</td><td>Major/moderate, Adverse and significant</td><td>Moderate, Adverse and not significant (para. 192 and Table 7.6)</td></tr><tr><td>Group B: Caunton to A617 – Road users</td><td>Construction and early operation</td><td>Moderate, Adverse and significant</td><td>Moderate, Adverse and not significant (para. 182 and Table 7.7)</td></tr><tr><td>Group C: Between Caunton, Eakring and Kneesall – PRowW users east of Eakring and around Maplebeck</td><td>Construction and early operation</td><td>Moderate, Adverse and significant</td><td>Major/moderate, Adverse and significant (para. 205 and Table 7.6)</td></tr><tr><td>Group C: Between Caunton,</td><td>Construction and early operation</td><td>Moderate, Adverse and not significant</td><td>Major/moderate, Adverse and significant</td></tr></table>				Receptor Group	Phase	NSDC LIR	Applicant LVIA	Group B: Caunton to A617 – PRowW users	After decommissioning	Major/moderate, Adverse and significant	Moderate, Adverse and not significant (para. 192 and Table 7.6)	Group B: Caunton to A617 – Road users	Construction and early operation	Moderate, Adverse and significant	Moderate, Adverse and not significant (para. 182 and Table 7.7)	Group C: Between Caunton, Eakring and Kneesall – PRowW users east of Eakring and around Maplebeck	Construction and early operation	Moderate, Adverse and significant	Major/moderate, Adverse and significant (para. 205 and Table 7.6)	Group C: Between Caunton,	Construction and early operation	Moderate, Adverse and not significant	Major/moderate, Adverse and significant
Receptor Group	Phase	NSDC LIR	Applicant LVIA																						
Group B: Caunton to A617 – PRowW users	After decommissioning	Major/moderate, Adverse and significant	Moderate, Adverse and not significant (para. 192 and Table 7.6)																						
Group B: Caunton to A617 – Road users	Construction and early operation	Moderate, Adverse and significant	Moderate, Adverse and not significant (para. 182 and Table 7.7)																						
Group C: Between Caunton, Eakring and Kneesall – PRowW users east of Eakring and around Maplebeck	Construction and early operation	Moderate, Adverse and significant	Major/moderate, Adverse and significant (para. 205 and Table 7.6)																						
Group C: Between Caunton,	Construction and early operation	Moderate, Adverse and not significant	Major/moderate, Adverse and significant																						

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses			
	summary of effects is presented in the table at paragraph 8.24 of the LIR. Effects on the following visual receptors are assessed to be not significant and Moderate/minor or less. They are summarised in TA A7.5 [EN010162/APP/6.4.7.5]: • Kersall (0.1 km); • A1 (0 km); • A616 (0 km); • A617 (0.3 km); • East Coast Main Line railway (0 km); and • Robin Hood Way (0.1 km). 8.26. Effects on the following visual receptors are assessed to be Negligible for the reasons described below or within TA A7.5 [EN010162/APP/6.4.7.5]. • All visual receptors beyond 2 km, based on the geographic distribution of changes to views set out in section 7.7.8; • Averham and Staythorpe (0.5 km); • Cromwell (1.5 km); • Eakring (0.2 km); • Maplebeck (0.2 km); • Group G: East of the A1 (0.0 km);	Eakring and Kneesall – Road users			(para. 211 and Table 7.6)
Agreement noted in relation to visual effects for the receptors listed.					

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	- Group H: Ossington to Cromwell and A616, including Norwell, Norwell Woodhouse and Caunton (0.2km); - Group I: Hockerton, Upton, Staythorpe, Averham and Kelham (0.3 km); - Group J: Between Hockerton and Eakring (0.5 km); - Group K: Kneesall to Laxton and Egmanton (0.2 km); - Recreational users of the River Trent (1.0 km), and - Nottingham to Lincoln (Newark Castle) Railway (1.7 km).	

Cumulative Effects

8.27 – 8.30	<u>Cumulative Effects</u> 8.27. The ES Chapter sets out the consideration of cumulative effects in section 7.9 and these are further referenced within the associated Technical Appendix. 8.28. The Cumulative Assessment does not assess the wider impacts on Landscape Character and Visual Amenity, it focuses on the immediate landscape character of the scheme and the study area which is not a 'wrong' approach but given the extent of schemes now being consented and the	Agreement that the assessment of cumulative landscape and visual effects provided within the ES is 'not wrong' is noted. Whilst NSDC may be concerned about landscape change at the regional level due to solar and BESS developments, it is not the function of cumulative assessment for an individual project to provide an evaluation of such change. The purpose of cumulative assessment is to inform the decision to be made relating to the individual project, as set out within Appendix 3 to the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. The assessment provided in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] fully

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	increase in NSIPS in the examination stages, there is the requirement for the assessment to expand to regional level and consider the impacts of the proposals in combination with the identified schemes on the wider landscape area. 8.29. Renewable Energy is identified in the LCAs as having the potential to change the landscape character and previously it has been relatively well controlled so that the region's rural character, and the historic settlement pattern of small red brick villages, is still intact. However, this is now at risk. 8.30. Local NSIPS which have already tested, or are in the process of examining, the assessment of cumulative effects includes Tillbridge and One Earth, where it has been drawn to the attention of the ExA that multiple schemes collectively influence the perceived character, openness, and rural qualities of the landscape.	considers the effects arising from the Proposed Development with all relevant short-listed cumulative projects on the local LCTs, regional landscape character area (Mid-Nottinghamshire Farmland) and national landscape character area (NCA 46 Trent and Belvoir Vales). Given that the latter two areas extend beyond the 2km study area, the LVIA therefore already considers the effects of the Proposed Development on landscape character more widely than the 2km study area. At paragraph 8.30 NSDC reference Tillbridge solar farm as being potentially relevant to consider. As shown by EN010142-000307-6.3 Fig 1-1 Location of the Scheme and Other Solar NSIPs.pdf that development would be located among a group of NSIP solar farms including Cottam, West Burton and Gate Burton, approximately 20km to the northeast of the Proposed Development. As explained in Appendix 3 to the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], an assessment of combined effects with all development within 20km would mostly describe effects arising from those other projects, not the effects of the Proposed Development, and as such is not pertinent to the consideration of the merits of the Proposed Development.
Summary and Conclusion		
8.31 – 8.34	<u>Summary and Conclusion</u> 8.31. The Development would lead to Significant adverse effects on the landscape	Section 5.7 of ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048] sets out the decommissioning process and the assessment provided within ES Volume 2, Chapter 7:

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	and visual amenity of the area across all the stages of the scheme (construction and early operation, operation and decommissioning and Post decommissioning) The scale of replacement of the solar arrays has not been considered in the LVIA, although the Operation and Decommissioning stage is judge to have a Major/Moderate, adverse and significant effect. 8.32. The LVIA needs to be clear on the embedded mitigation the benefits of the scheme and how these can be managed post decommissioning to ensure that they are long lasting and genuine. 8.33. There is the potential for this Development to have an adverse and significant effect on the landscape resource at a regional scale, as it is cumulatively considered with a number of large NSIPs and consented schemes. Previous Developments have taken this approach, and a more strategic scale Cumulative Assessment is required. This is a rural agricultural landscape and the schemes in combination have the potential to permanently change the character of the immediate and wider landscape. 8.34. The scale and extent of the Development would also lead to Significant	Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] has been undertaken on that basis. Agreement that sequential assessment has been provided is noted, however the assessment is not only provided “<i>at a Site level</i>”. The main LVIA considers effects across the agreed 2km LVIA study area with all operational and consented cumulative shortlisted projects, and the cumulative assessment uses the same methodology and approach in relation to developments in planning. Given this, sequential effects are considered with all cumulative developments through considering the effects of the Proposed Development when it is seen as part of a journey during which the viewer may also see other developments. A distance of ‘several kilometres’ through ‘this landscape’ is a vague scope for assessment. A person undertaking such a journey could use a route via which they experience no or very limited visibility of solar farms or other developments, or a route which closely passes all of the sites – so effects could, and would be likely to range from negligible to significant. With a network of minor roads and footpaths there is no ‘typical’ journey that can be used as being representative – different people will use different routes at different times for a variety of reasons. Because of this, sequential assessment usually focusses on primary rail and road routes, and long distance recreational routes, as these represent frequently used routes for people travelling longer distances. For GNR those routes would be the A1, A617, A616, East Coast Main Line and Robin Hood Way. Effects of the Proposed Development on these routes, taking account of existing and consented developments

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	effects on views from large group of receptors across the scheme area, changing rural view through the introduction of the solar arrays. The LVIA does consider the 'sequential' views at a Site level, however the cumulative impacts on receptors as they move through the landscape has not been assessed. The LVIA needs to address receptors on PRoWs and local roads, who are moving through this landscape across several kilometres.	are considered in the LVIA and are identified as being at most Moderate/minor during early construction, and mostly lower than that, as summarised in Table 7.7 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A]. Section 7.10.7 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] confirms that the impacts assessed on those routes would not change in the context of potential developments in planning. Also see above response to paragraphs 8.27-8.30.

Local Policy

8.35 – 8.41	8.39. As indicated above, the NSDC strategic level policies as contained within the Amended Core Strategy seeks to integrate new development into landscape character areas. Given the scale and extent of the proposed development, the proposed development fails to meet with this objective, given the significant change in the landscape character that will result. 8.40. Core Policy 13 and policy DM5 are supplemented by Policy DM4 of the ADMDPD which identifies that proposals will be supported, where its benefits are not outweighed by detrimental impacts from the construction, operation, and maintenance of	The Applicant notes that Core Policy 13 and policy DM5 are supplemented by Policy DM4 of the ADMDPD. The tests within Policy DM4 are considered to be in conflict with the policy set out in NPS En-3. Policy DM4 relates to planning applications rather than development consent applications for NSIPs. In accordance with paragraph 4.1.15 of NPS EN-1 where there is a conflict between a Local Plan and an NPS, then the NPS prevails for the purpose of SoS decision making given the national significance of the infrastructure. As set out within the Planning Statement [EN010162/APP/5.4B] at paragraphs at 7.3.12 to 7.3.13 <i>“7.3.12 Paragraph 5.10.14 of NPS EN-1 states that “The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.” 7.3.13 The significant national and local benefits of the Development are</i>

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	the development, with impacts on landscape character (both individually and cumulatively) being a key criteria. 8.41. As referred to above, the ES LVIA Chapter reports a number of significant adverse effects, during operation and given that NSDC is not the determining authority in this case, any weighing up of benefits is a matter for the ExA. Accordingly, the proposed development is judged to be in direct conflict with Policy DM4 of the ADMDPD in respect of landscape character and associated visual impacts.	<i>considered to outweigh the limited number of localised visual effects. Therefore, it is policy compliant with NPS EN-1."</i>

Table 3-2 Responses to NSDC's Comments on Biodiversity (including Net Gain) and Arboriculture

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Methodology</i>		
9.1 – 9.2	9.1 The Ecological Impact Assessment methodology is presented section 8.4 of Chapter 8 of the ES and within the accompanying Technical Appendices. NSDC are of the opinion that the level of survey effort,	It is noted that the level of survey effort, survey methods and desk-study are considered broadly appropriate. Additional details about the timing and survey effort of baseline habitat surveys, and the commitment to update these surveys following

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	survey methods and desk-study research undertaken to identify important habitats and establish the baseline biodiversity is broadly appropriate, however there are concerns that Chapter 8 does not sufficiently quantify baseline habitats, specifically the timing and survey effort and is currently under discussion. The applicant has committed to updating the baseline habitat surveys and condition assessments post-consent which is welcomed in this regard. 9.2 Section 8.4.2 describes the impact assessment methodology, which is based on the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment (EcIA). The applicant has provided justification for deviating from the methodologies outlined in Chapter 2 of the ES for determining significant effects and for departing from the generic matrix. However, we remain concerned about the transparency of the process used to conclude that no significant effects occur for all key ecological receptors. Although Table 8.12 summarises the likely effects, the rationale for defining potential effects is not clearly presented.	consent, is provided in ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A]. The assessment methods in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] follow the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment. In accordance with the guidelines, effects are characterised by the following attributes, as required: positive or negative; extent; magnitude; duration; frequency and timing; and reversibility. The guidelines state that “The assessment only needs to describe those characteristics relevant to understanding the ecological effect of the impacts and determining its significance.” These characteristics are discussed, where relevant, for each Important Ecological Feature included in the assessment but are not necessarily explicitly referenced. For example, extent may be quantified by hectareage or linear distance, and frequency may be defined qualitatively as ‘infrequent’ or ‘occasional’. Section 8.7 in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] characterises general effects and, in combination with the assessment of likely effects to each Important Ecological Feature in section 8.8, provides the rationale for conclusions about the significance of effects. The aim of Table 8.12 in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] is to provide a high-level summary of effects and does not attempt to qualify these.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Baseline Conditions</i>		
9.3 – 9.4	9.3 The existing ecological features identified during the desk study, consultations and field surveys are summarised with full details including survey methods and field survey results being provided in appendices (with the Badger elements within Appendix A8.10 and Schedule 1 Breeding Birds within Appendix A8.11 as confidential). 9.4 Although the ecology reports submitted in support of the DCO adhere to CIEEM guidelines, they provide limited information on the relevant expertise and qualifications of the competent experts involved in preparing the ES. This is particularly notable for the Modular River Physical (MoRPh) survey. Furthermore, the Biodiversity Net Gain (BNG) technical appendix (A8.13) does not include baseline condition assessments, which are necessary to enable a transparent review of the baseline.	Agreement noted that existing ecological features are adequately described. The competence of the lead ecologist is summarised in section 1.4 and Table 1.2 of ES Volume 2, Chapter 1: Introduction [EN010162/APP/6.2.1] [APP-044]. The expertise and qualifications of other surveyors and contributors has not been provided but, for the avoidance of doubt, all persons are suitably qualified, experienced and hold the necessary survey licences for the work undertaken. The qualifications of those involved in the MoRPh surveys are provided in ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A]. The revised BNG Assessment also includes Condition Assessments and summaries of related information.
<i>Construction Phase Impacts</i>		
9.5	9.5 The main impacts in relation to biodiversity would stem from the construction phase of the development.	It is agreed that the main adverse effects would arise during construction.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Positive</i>		
9.6	9.6 NSDC have identified no positive impacts during this phase.	It is agreed that no positive effects have been identified during the construction phase.
<i>Neutral</i>		
9.7 – 9.16	9.7 A 'shadow' Habitat Regulations Assessment (HRA) has been submitted in support of the proposal. The HRA identifies the Birklands and Bilhaugh Special Area of Conservation (SAC) located approximately 7km to the northwest and Sherwood Forest possible potential Special Protection Area (ppSPA) situated approximately 4.5km to the west and northwest in relation to impacts. Although outside of the 'screening distance' the Humber Estuary SAC/Ramsar is also included. Loss, disturbance, and displacement of mobile species using Functionally Linked Land is identified for assessment and this is considered appropriate, as is hydrological connectivity and air quality impacts. Impacts on the above listed sites are ruled out in the assessment and this is agreed as appropriate and that an Appropriate Assessment is not required. As a result, NSDC agree that the scheme would not result in a likely significant effect on any	Agreement noted that the Development will not have likely significant effects on European sites. Agreement noted that the Development will not have significant adverse effects on Sites of Special Scientific Interest (SSSI) or Local Wildlife Sites (LWS). Clarification about the status of the potential Coastal and Floodplain Grazing Marsh is provided in section A8.3.3.2.4 of ES Volume 4, Appendix A8.3: Habitats and Vegetation Baseline [EN010162/APP/6.4.8.3B], which concludes that the area does not meeting the criteria to be classified as a priority habitat. This habitat is in Work Area 3 Mitigation/Enhancement and thus will not be adversely affected by the Development. Individual habitats are identified as Important Ecological Features in Table 8.7 in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] and include Lowland Mixed Woodland, Native Hedgerows, Ponds, and Rivers and Streams. The potential effects on each habitat are characterised separately from each other in section 8.8.8 of Chapter 8 and, given the similarity of effects for all habitats and the wish to provide a holistic view of these features, an overall

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	European site either alone or in combination with other projects or plans. 9.8 No statutory designated sites fall within the Order Limits (OL) and eight Sites of Special Scientific Interest (SSSI) are located within the search area. Of these, three sites have been scoped into the assessment and potential impacts could include permanent habitat loss, temporary habitat loss as a result of disturbance, habitat fragmentation, habitat change and direct disturbance of fauna these sites support. 9.9 Mitigation for Eakring and Mapplebeck Meadows SSSI include work timings to avoid the breeding bird season, Horizontal Directional Drilling (HDD) and dust and water pollution mitigation measures as detailed within the outline CEMP. 9.10 Embedded mitigation measures will ensure that construction works do not encroach into Mather Wood SSSI and proposed measures to avoid water pollution and mitigation potential surface water effects will reduce any potential harm to Laxon Sykes SSSI. All mitigation for statutory designated sites will be secured through Requirements 12	conclusion of significance is provided for all habitats to help provide a more concise assessment without unnecessary repetition. Agreement noted that the survey effort for reptiles is acceptable. It is noted that culvert design and the use of HDD are supported as ways to reduce adverse effects on water vole and otter. Water vole mitigation, if required, will be carried out under a CL31 displacement class licence, issued by Natural England, the terms of which specify the timing constraints and mitigation measures. The Development will proceed in full accordance with the requirements of the licence. It is noted that the mitigation proposed for badgers is acceptable.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	(CEMP) and 8 (LEMP) which is detailed within the outline documents provided. 9.11 A total of 16 non-statutory sites designated for biodiversity importance, all of which comprise Local Wildlife Sites (LWS), either fall within or border the OL. Additional LWS including Kersall Grassland LWS and Hunt's Meadow LWS and Coppice, Mather, and Lady Woods LWS have been scoped in due to their direct connectivity so Eakring and Maplebeck Meadows SSSI and Mather Wood SSSI, respectively. Likewise, mitigation will be secured through Requirements 12 (CEMP) and 8 (LEMP) which is detailed within the outline documents provided. This is to include HDD where Work no.2 cables intersect LWS, protective fencing, a minimum 15m buffer and new habitat creation complimentary to the existing habitats. As a result, NSDC are generally satisfied that sufficient information has been provided to conclude that there would be no potential for significant effects these or any more distant designation as a result of the Scheme. 9.12 Areas of Priority Habitat located within the OL that were identified through the desk study comprise Good Quality Semi-Improved Grassland, Coastal and Floodplain Grazing	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	Marsh (CFGM), Lowland Mixed Deciduous Woodland and Wood-pasture and Parkland. Through field surveys only the areas of deciduous woodland were considered to meet the Priority Habitat Criteria. The area of CFGM is located on the banks of the Mapplebeck and whilst it is anticipated that there would be no negative impact upon this habitat, NSDC have raised queries regarding the assessment process to determine ecological importance as set out within our Relevant Reps response. 9.13 It is anticipated that mitigation measures secured through Requirements 12 (CEMP) and 8 (LEMP) will minimise potential impacts on habitats. Nevertheless, NSDC has expressed concerns regarding the transparency of the assessment and does not consider that aggregating habitats identified as having the highest ecological value (broadleaved woodland, native hedgerows, rivers and streams and ponds) constitutes a robust methodology. However, issues relating to the evaluation of hedgerows have been satisfactorily resolved with the applicant, as documented within the draft Statement of Common Ground (SoCG). 9.14 There has been some discussion between NSDC and the Applicant regarding the	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	adequacy of reptile survey effort. However, following the provision of further justification, the level of survey effort is considered acceptable, given the commitment to include Reasonable Avoidance Method Statements within the final CEMP. 9.15 Two of the proposed watercourse crossings have confirmed evidence of water vole, with a further five assessed as having optimal or good suitability for the species, and four crossings considered to provide suitable habitat for otter. The final locations of cable crossings will not be determined until the detailed design stage. The proposed design for new culverts is broadly acceptable and is appropriately secured through Requirement 12, along with pre-commencement checks for works affecting watercourses and their riparian zones. The use of HDD for major watercourse crossings is supported, as it will avoid impacts on these species. Where water vole presence has been confirmed, works will proceed under a CL31 displacement class licence. Overall, NSDC considers that impacts on water vole should be avoided; however, details regarding timing constraints for displacement under licence and the implementation of mitigation	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	measures remain under discussion with the Applicant. 9.16 Badgers may be adversely impacted by the proposed development through loss of habitat in which to build setts, accidental direct harm during construction, disturbance by vehicles and personnel or the compaction of soil around setts. Appropriate development free buffer zones around all known setts according to their status have been designed into the scheme and pre-construction surveys are secured through the oCEMP. Connectivity is to be maintained through the development by delivering mammal access points within the fencing.	
<i>Negative</i>		
9.17 - 9.25	9.17 Although most baseline habitats are of relatively low biodiversity value and the development has potential to deliver biodiversity enhancements, NSDC has raised concerns regarding the methodology used to quantify existing habitat value, as outlined in the Relevant Representations. Habitats may have been undervalued within the BNG assessment due to limited sampling of areas of higher ecological importance, such as Lowland	Arable field margins are appropriately considered in Table 8.8 in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A]. Further clarification about the status of this habitat is provided in section A8.3.3.2.4 of ES Volume 4, Appendix A8.3: Habitats and Vegetation Baseline [EN010162/APP/6.4.8.3B]. It is acknowledged that arable field margins, which are mostly modified grassland, are a potentially valuable habitat in the agricultural landscape. The Development will retain and create large areas of such habitat.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	Mixed Deciduous Priority Habitat and semi-improved neutral grassland. Furthermore, no consideration appears to have been given to whether arable margins qualify as Priority Habitats, despite the presence of rare and scarce arable plants identified in the desk study. Arable field margins, together with the hedgerow and ditch network, represent the primary sources of wildlife value within the Scheme, and their loss would therefore be significant. 9.18 A total of 33 track/road watercourse crossings and 34 fence crossings are proposed across the OL. Whilst clear span bridges have been prioritised over culverts where possible and it is acknowledged that final designs will be confirmed following granting of the DCO, there is uncertainty around how associated encroachment levels have been assessed within the context of the BNG assessment and is under further discussion to establish whether the assessment is precautionary enough. 9.19 The value of watercourses within the OL may also have been underestimated within the context of the BNG assessment. In particular there is a low sampling rate for ditches which the applicant has justified due to changes in the OL during the design process. Once fully	Section A8.13.2.2.3 of ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A] provides: • clarification about, and justification for, the value of habitats. All habitats have been appropriately valued and the conclusions of the BNG Assessment are not substantively changed. • how encroachment has been assessed. Encroachment has been appropriately assessed and the conclusions of the BNG Assessment are not substantively changed. • clarification about the valuation of watercourses, ditches in particular. Watercourses have been appropriately valued and the conclusions of the BNG Assessment are not substantively changed. Section 8.12.6 of ES Volume 4, Appendix A8.12: Arboricultural Impact Assessment (AIA) [EN010162/APP/6.4.8.12] [APP-225] states that the Development will not result in the loss or pruning of veteran trees and that protective measures will be in place to prevent access to their root protection areas and buffers. Consequently, there will be no adverse effects to veteran trees. Veteran trees have been included as irreplaceable habitats in ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A]. The potential effects of habitat fragmentation on great crested newt are recognised in section 8.8.10 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A]; notably, the favourable management of terrestrial habitats and the creation and enhancement

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	assess it is considered that it will be difficult to meet a 10% uplift in watercourse units on-site. 9.20 The Council's Relevant Representations also raised concerns regarding veteran trees. Chapter 8 does not identify any veteran trees, whereas Technical Appendix A8.12 (Arboricultural Report) states in section 8.12.6 that nine trees were classified as veterans, with additional trees listed in Appendix D as exhibiting veteran features. Confirmation has been requested on whether any mature trees are considered veteran under the UKHabitat classification system and how these receptors will be addressed. At present, insufficient information has been provided to demonstrate that all veteran trees will be protected throughout the lifetime of the development or that the scheme will comply with local planning policy requirements in this regard. Securing this commitment during construction is essential to achieving Biodiversity Net Gain as veteran trees represent irreplaceable habitat. 9.21. Great crested newt (GCN) has been confirmed to be present within ponds within the south-western extent of the OL. As outlined within the Council's Relevant Representations,	of ponds will provide beneficial effects, albeit not significant in EIA terms. ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3B] includes a range of measures to safeguard hedgerows and watercourses (and other sensitive and important habitats) from accidental pollution events during construction, and so there will be no reduction in habitat quality for bats. Section A5.3.11.10 of ES Volume 4, Appendix A5.3: Outline CEMP [EN010162/APP/6.4.5.3B] recognises the potential adverse effect of lighting on bats and includes measures to reduce this, including a commitment to design lighting in sensitive locations in accordance with the Institute of Lighting Engineers (2023) Guidance Note GN08/23 Bats and Artificial Lighting at Night. Mitigation to reduce potential adverse effects on breeding birds will be achieved through measures both embedded in the Development design and additional measures implemented during construction,. Operation and decommissioning. These measures will be secured by the relevant requirements of the DCO. The impact of solar PV panels on nesting skylark is assessed in section 8.8.15 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] and the mitigation proposed recognises the habitat requirements of the species and therefore includes extensive areas of large, open arable and grassland areas. ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) Appendix [EN010162/APP/6.4.5.1.1A] [REP1-027] specifies that Breeding Bird Surveys, possibly with bespoke methods, will be undertaken to monitor bird populations. The details of these

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	concerns have been raised regarding uncertainty as to whether impacts upon GCN have been adequately addressed. Given the design of the proposal, NSDC agree that no breeding ponds would be lost to the scheme, however potential impacts to habitat connectivity and fragmentation have not been thoroughly considered and could impact on meta-populations. 9.22. Accidental damage or pollution events during construction could degrade the hedgerow and watercourse network leading to localised, temporary adverse reductions in habitat quality for foraging bats. 9.23. Whilst Chapter 8 and the oCEMP and ooCEMP do have regard to lighting impacts in relation to bats and other nocturnal fauna, these considerations are insufficient with respect to light-sensitive species, particularly barbastelle. This species is particularly important within the Newark and Sherwood District being at the northern extent of its known range in Nottinghamshire and is vulnerable to large scale infrastructure schemes. 9.24. The introduction of tall structures and associated equipment into arable fields is	surveys and associated remedial measures will be developed in the final LEMP in consultation with NSDC. Agreement noted that the effects on wintering birds will be minor.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	expected to substantially, and potentially entirely, displace nesting birds. Certain species, such as yellow wagtail, may be less affected due to their ability to nest in taller vegetation and tolerate reduced visibility. This displacement is likely to persist for the duration of the project, potentially fragmenting local bird populations and increasing competition within adjacent arable and grassland habitats, which may already be close to their ecological capacity. Population dynamics of species such as skylark, yellow wagtail, and grey partridge are anticipated to be moderately adversely affected at a Local, and possibly District, level (though not at County level) in the absence of mitigation. While embedded mitigation is proposed, clarity is lacking on how measures such as skylark plots will be secured and whether features like beetle banks will remain post-decommissioning. Although a worst-case scenario has been assessed, additional provision within Works 1 areas is unlikely to create suitable breeding habitat for skylarks due to their requirement for long, uninterrupted sightlines. The presence of solar PV panels reduces landscape openness, diminishing its suitability for skylark nesting due to increased predation risk. Furthermore, the revised OL	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	offers less enhanced arable land compared to the Preliminary Ecological Impact Report (PIER). Monitoring is included within the oLEMP; however, no triggers have been defined to indicate when remedial action should be implemented. 9.25 The potential extent and severity of impacts on overwintering birds are largely dependent on the timing of construction activities. Given the anticipated 24-month build programme, some works during winter are likely unavoidable. As a result, there remains a risk that flocks of wading birds, such as golden plover and lapwing, may be deterred from using parts of the Works Areas 1 & 2 they would ordinarily visit for foraging and shelter. However, considering the substantial availability of similar open habitats nearby, and the fact that habitats within the OL were not assessed as being of elevated importance or functionally linked to designated bird conservation sites, this impact is considered minor. This is particularly relevant as no permanent construction activities will occur within the south-eastern fields of the OL, where the majority of flocking wader and waterfowl species were recorded near the River Trent	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	corridor. Nonetheless, disturbance and displacement risks remain in this location should cabling works occur during winter months.	
<i>Operational Phase Impacts - Positive</i>		
9.26 – 9.28	9.26 Water quality in ditches and other watercourses within the OL is expected to improve after development. This improvement is linked to the planned establishment of permanent grassland beneath the solar PV panels, which will help reduce sediment runoff, and the cessation of fertiliser and pesticide application. Similarly, the halt in agricultural activities is also likely to enhance water quality in existing ponds within the OL. 9.27 The shift away from intensive arable farming, particularly the discontinuation of insecticide use, and the conversion of land to permanent grassland for the lifespan of the solar array are expected to enhance both the diversity and abundance of invertebrates across the site. 9.28 Further positive effects are expected from the enhanced ability of the newly established	Agreement noted about the positive effects arising during operation.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	and managed grasslands, along with other forb-rich habitats, to support a larger abundance invertebrates compared to arable land. These habitats will cover most of the OL, including areas beneath the solar PVs and within buffer zones and easements and dedicated biodiversity mitigation areas. This is likely to boost the availability, variety, and productivity of foraging resources for a range of faunal species.	
BNG		
9.29 – 9.33	9.29 Although delivering a 10% uplift in Biodiversity Net Gain is not currently mandatory for NSIPs, the Statutory Biodiversity Metric (SBM) has been applied to calculate net gains for the Scheme, as detailed in Appendix 8.13. The BNG mitigation hierarchy has been adhered to, prioritising the avoidance of high- and medium-distinctiveness habitat types wherever possible, and a precautionary approach has been adopted. 9.30. Whilst in principle matters relating to biodiversity net gain are likely attributed with having a positive impact on the local area, NSDC has provided the applicant with detailed	ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A] provides a revised assessment addressing the issues raised in the Relevant Representations and Local Impact Report. The matter will continue to be discussed to the satisfaction of NSDC, noting their view that the Development is likely to deliver a minimum of 10% gain in habitat, hedgerow and watercourse units and deliver positive outcomes overall and align with national and local policy objectives.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	feedback on the BNG assessment as detailed within our Relevant Representations. 9.31. The level of detail is sufficient to understand what is being offered in broad terms but it does not constitute a full specification suitable to set terms of reference for agreement of the detailed plan later as a Requirement. Whilst the quantum of BNG to be achieved is likely to over 10% in all three habitat categories (habitat areas, hedgerows, and watercourses), this cannot be confirmed until adequate information is provided to verify the Applicant's BNG calculations. Further justification is required for the condition scores assigned to both baseline and proposed habitats, including enhancements to major watercourses within the OL, which currently rely on reduced encroachment and increased strategic significance rather than improvements to watercourse condition. 9.32. NSDC has also raised concerns regarding the classification of habitat beneath solar panels, as noted in the Council's Relevant Representation. However, the Council acknowledges that conversion of cropland to grassland will deliver a significant gain regardless of calculation method. Areas of concern include the absence of supporting soil	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	tests to confirm nutrient indices for establishing species-rich grassland. 9.33. Furthermore, NSDC would welcome continued discussion and consultation on opportunities to deliver additional green corridors and connectivity to off-site Priority Habitats. Despite these concerns, the Scheme is expected to deliver positive outcomes overall and align with national and local policy objectives.	
<i>Neutral</i>		
9.34 – 9.35	9.34 Operational impacts are anticipated to be minimal, as vehicle access will be infrequent and controlled, with no expected requirement to enter watercourses or ditches during array operation. This significantly reduces the potential for disturbance, pollution, or physical damage. 9.35 It is acknowledged that predicting long-term effects of solar farms on bat populations remains challenging, as large-scale solar installations have not been routinely monitored for such impacts. While some studies indicate potential adverse effects on the abundance of certain bat species following Solar PV installation, these effects are not considered	Agreement noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	significant. This is due to the habitat creation and enhancement measures proposed, which are expected to deliver overall improvements to bat foraging and commuting habitats once established. The oCEMP includes provisions for pre-construction surveys to assess trees for potential bat roosts and to identify any necessary mitigation measures.	
<i>Negative</i>		
9.36 – 9.37	9.36 There is a potential risk of pond damage if sheep are used for post-construction grazing, as trampling may degrade pond habitats, harm adjacent vegetation, and increase suspended sediment levels in the water. 9.37 Given the scale of the project, there are opportunities to deliver innovative biodiversity enhancements that extend beyond simply maximising percentage Biodiversity Net Gain. While current proposals indicate the creation of species-rich grassland and wood pasture, achieving a minimum uplift of 60% in habitat units and an 11% increase in watercourse units, there remains scope for greater alignment with local nature conservation priorities. Potential missed opportunities include the creation or restoration of coastal	There are four existing ponds within Work Area 1 Solar PV and another two will be created. Section A5.1.8 of ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) Appendix [EN010162/APP/6.4.5.1.1B] now includes measures to protect ponds from disturbance caused by grazing. The potential of the Development to provide biodiversity enhancements beyond those currently proposed is recognised in the oLEMP and such measures will be discussed by the Steering Group. Pending the results of the revised ES Volume 4, Appendix A8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A], we would welcome further discussion about the coastal floodplain grazing marsh and in-channel watercourse enhancements.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	floodplain grazing marsh and the enhancement of watercourses within the OL through in-channel improvements and riparian habitat enhancement.	
<i>Decommissioning Impacts</i>		
9.38	9.38 Activities relating to the removal of solar panel frames, some underground cabling, fencing and gates, some substations and concrete footings, some access tracks/roads and energy storage would be expected to have similar (or no worse) direct effects as those described in the construction phase impacts for each receptor. Comparable levels of disturbance from movement of vehicles and personnel would be expected.	This is noted.
<i>Positive</i>		
9.39	9.39 Returning the land to open arable use could benefit certain farmland bird species that rely on clear sightlines, as well as plant species typically found along arable field margins. However, this potential benefit is uncertain at this stage and would depend on the	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	implementation of a detailed decommissioning plan, of which has not yet been established.	
<i>Neutral</i>		
9.40	9.40 Depending on the ecological value of the habitats that develop over the lifespan of the scheme, it is realistic that certain areas of the site will be retained due to their value for wildlife on decommissioning. Further surveys to identify the use of the newly created habitats by these receptors would therefore also be expected as a minimum.	This is noted and is in agreement with the approach set out in the Decommissioning Ecological Management Plan in section A5.6.6.13 of ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] .
<i>Negative</i>		
9.41 – 9.42	9.41 Habitats created on former arable land are likely to be returned to their former land use, resulting in permanent habitat loss. This is most likely to constitute a loss of species-rich grassland. However, depending on the biodiversity value of these new habitats, this may not constitute a significant negative impact, as BNG requirements will have been met before decommissioning. Returning the land to arable production would likely involve increased pesticide and herbicide use, which are linked to biodiversity decline.	This is noted and potential adverse effects arising during decommissioning area assessed in section 8.8 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] .

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	9.42 Based upon the baseline data, protected species which could be directly impacted by decommissioning activities could include badgers, water vole, otter, reptiles (grass snake), great crested newt and breeding birds.	
<i>Cumulative Impacts</i>		
9.43 – 9.45	9.43 The impacts of major solar farm developments should not be assessed in isolation. Proposals must be considered in the context of other similar schemes—whether consented, under construction, or operational—both within the District and in adjacent areas, to fully understand their cumulative effects. Cumulative impacts in relation to IEFs are assessed within section 8.9 of Chapter 8, though it is noted that the One Earth scheme has not been included within Table 8.11. NSDC consider this an omission given it had been identified to progress to stage 3 & 4 within the Cumulative Assessment Stages 1 and 2 technical appendix (TA A2.1). The Scheme will be a significant feature in the landscape with extensive landscape scale conversion of arable farmland to grassland and other habitats and this cumulative habitat loss should be further examined in terms of its	One Earth Solar Farm has been included in the cumulative assessment in section 8.9 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A]. The conclusions of the cumulative assessment remain unchanged. Notwithstanding the above, the potential cumulative effects on ground-nesting birds and other features are assessed in section 8.9 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] and agreement is noted on the conclusions of the assessment for the majority of features.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	specific biodiversity features of interest, in particular for farmland birds. 9.44 For the schemes that have been evaluated all environmental aspects have been considered and no significant effects are predicted on the receptors identified given mitigation proposed for this development and likely standard / good practice mitigation proposed for the other sites. Assuming that proposed mitigation for this proposal is adequately secured in the DCO, the Council agrees with the applicant's conclusions in relation to cumulative effects on ecology for the majority of the receptors assessed. 9.45 Ground-nesting birds are likely to experience displacement from each proposed project because solar infrastructure conflicts with the long, uninterrupted sightlines these species need to detect predators while nesting. The extent of negative impact will depend on the mitigation measures implemented by each scheme and the degree of spatial and temporal overlap. Therefore, if similar or less effective mitigation is applied, there is a potential for a moderate cumulative adverse effect on skylark populations at a local, and possibly district, scale. Comparable impacts may also occur for yellow wagtail and grey partridge, as these	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	species are likewise ground -nesting and could be displaced to varying degrees during the breeding season.	
<i>Required Mitigation</i>		
9.46 – 9.48	9.46 The mitigation hierarchy, as dealt with in the EN-1, includes avoidance as part of the Design stage. This is evidenced separately within Chapter 4, where the scheme design was revised in response to ecological assessments to avoid Priority Habitats as far as possible and minimize areas of potentially significant impact and in this respect complies with local policy. 9.47 Mitigation and compensation have been considered and are dealt with in varying levels of detail. The outline Landscape and Ecology Management Plan (oLEMP) outlines some initial planting guidelines; however, there are few details regarding remedial measures required with regards to existing nutrient levels and no consideration of soil nutrient analysis. There are also minor discrepancies within habitat areas/lengths referenced between the oLEMP and the BNG assessment report and those inputted into the SBM. The guidance needs to be firmed up within the final LEMP in	Soil testing (to determine nutrient levels) has been included in ES Volume 4, Appendix A5.1: Outline LEMP Appendix [EN010162/APP/6.4.5.1.1B] [REP1-027]. Further remedial measures will be developed in the final LEMP. Discrepancies in the extents of habitats in the oLEMP and BNG Assessment have been addressed in ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A]. The LEMP is subject to a requirement of the DCO, which includes consultation with NSDC, and thus ensures that it will be fit for purpose and is secured. Agreement noted that ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3B] and Outline Operation Environmental Management Plan [EN010162/APP/6.4.5.5B] are applicable and proportionate.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	order to be assured that the enhancement proposed are likely to be successful and to create the screening required to lower the visual impact to surrounding sensitive landscape from the proposed Solar Farm and to ensure mitigation for farmland birds and BNG is delivered. 9.48 An outline Construction Environmental Management Plan (oCEMP) and outline Operational environmental Management Plan (ooCEMP) have been produced to detail construction and operational mitigation measures. An outline Decommission Management Plan also details mitigation measures for this later stage of the Scheme. The outlined plans are considered applicable and proportionate to the Scheme, though detailed feedback to address inconsistencies	
<i>Local Planning Policy</i>		
9.49 – 9.52	9.49 Newark and Sherwood's Vision as noted within the Council's Amended Core Strategy DPD 2019; states as follows. <i>'By 2033, Newark and Sherwood will...maximise opportunities for appropriate renewable energy...while safeguarding and enhancing the natural environment,</i>	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<i>strengthening green infrastructure, new green and woodland spaces will increase ecology, biodiversity and nature conservation, providing a resource for local people and encouraging personal well-being and health.'</i> 9.50 Nottinghamshire is losing its wild species and habitats at an alarming rate (Nottinghamshire Local Biodiversity Action Plan). Nature is being increasingly confined to small, fragmented areas with little or no connectivity. 9.51 Information exists on the biodiversity improvement priorities within the county. The most important areas for wildlife conservation remaining in Newark and Sherwood have been identified through the Nottinghamshire Biodiversity Map (BOM) Reports. BOMs are recognised as those areas where targeted maintenance, restoration and creation of priority habitats will have the greatest impact in improving connectivity and reducing habitat fragmentation. The Newark and Sherwood BOM was published in 2016, and which was used to inform the Focal Areas identified in Newark and Sherwood District Council's adopted document outlining Mandatory Biodiversity Net Gain Strategic Significance	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	which was adopted by Cabinet on 23 January 2024. 9.52 Newark and Sherwood District Council produced a Green Infrastructure Strategy 2010, responding to the need to plan for predicted growth, enhance quality of life and ensure environmental sustainability in the District for generations to come.	
<i>NSDC Amended Core Strategy (AMC) Policy 12 Biodiversity and Green Infrastructure</i>		
9.53	9.53 Core Policy 12 (Biodiversity and Green Infrastructure) Amended Core Strategy Development Plan in 2019 sets out how developments should protect and enhance biodiversity, including the provision of new or improved green infrastructure. Supporting text states: <i>'Seek to secure development that maximises the opportunities to conserve, enhance and restore biodiversity and geological diversity and to increase provision of, and access to, green infrastructure within the District.'</i>	This is noted.
<i>Allocations and Development Management Development Plan Document (ADMDDP) Policy DM5 Design</i>		
9.54	9.54 Policy DM5(b) (Design) Allocations and Development Management DPD 2023	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	(Amended plan currently under examination) states that: <i>"...in accordance with the requirements of Core Policy 9, all proposals for new development shall be assessed against the following criteria:</i> <i>...</i> <i>...5. Trees, Woodlands, Biodiversity & Green Infrastructure</i> <i>In accordance with Core Policy 12, natural features of importance within or adjacent to development sites should not be unnecessarily adversely impacted and development should first seek to respect existing features before the Council will consider removal of such features. The starting point should be through integration and connectivity of the Green Infrastructure to deliver multi-functional benefits.</i> <i>7. Ecology</i> <i>Where it is apparent that a site may provide a habitat for protected species, development proposals should be supported by an up-to date ecological assessment, including a Habitat survey and a survey for species listed in the Nottinghamshire Biodiversity Action Plan. Significantly harmful ecological impacts should be avoided through the design, layout and</i>	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	detailing of the development, with mitigation, <i>and as a last resort, compensation (including off-site measures), provided where significant impacts cannot be avoided.</i> "	
ADMDPD Policy DM7 Biodiversity and Green Infrastructure		
9.55 – 9.56	9.55 Policy DM7 (Biodiversity and Green Infrastructure) Allocations and Development Management DPD 2023 (Amended plan currently under examination) states that: <i>'Development proposals in all areas of the District should seek to enhance biodiversity. Proposals should take into account the latest information on biodiversity including Nottinghamshire Biodiversity Opportunity Mapping, and the forthcoming Local Nature Recovery Strategy. Except for exempt development proposals, the enhancement should be a net gain of at least 10% (or if different, the relevant percentage set out in the Environment Act) as measured by the applicable DEFRA metric or any successor document. These gains must be guaranteed for a period of at least 30 years....</i> <i>New development should protect, promote, and enhance green infrastructure to deliver multi-functional benefits and contribute to the</i>	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<i>ecological network both as part of on-site development proposals and through off-site provision.'</i> 9.56 The collective policies as reviewed above seek to protect biodiversity assets within the district, alongside promoting biodiversity enhancement. Whilst the latter is likely, given the proposals for Biodiversity Net Gain associated with the proposed development, in respect of impacts upon existing biodiversity, it is considered that through an appropriate level of mitigation to be agreed with NSDC, impacts are anticipated as being neutral.	
Arboriculture – Assessment Methodology		
9.57 – 9.58	9.57 The presence of trees is considered within Technical Appendix A8.12 – Arboricultural Impact Assessment which sets out at paragraph 8.12.1.2 that 'The aim of the study was to assess the potential impacts of the Development on trees and woodland by addressing the following objectives: • Identify potential constraints to inform the Development design such that it can avoid and reduce potential arboricultural impacts;	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	• Screen the Development design for residual arboricultural impacts; • Carry out an arboricultural impact assessment on parts of the Development where potential impacts can reasonably be predicted; and • Propose mitigation to avoid and reduce arboricultural impacts.' 9.58 The field survey carried out a targeted survey of trees within the Order Limits Area and recorded trees within the following categories: • Cat A – High quality trees with an estimated life expectancy of at least 40 years; • Cat B – Moderate quality trees with an estimated life expectancy of at least 20 years; • Cat C – low quality trees with an estimated life expectancy of at least 20 years, or young trees with stems below 150 mm diameter; and • Cat U – Trees in a condition such that they will not survive beyond 10 years.	
Assessment		
9.59 – 9.62	9.59 The report confirms that as part of the survey, a total of 325 individual trees, 126	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	groups of trees were recorded and the following summary impacts on trees are noted (by category). Ancient Woodland – Tree Groups identified will be outside of 15m buffer zone areas, other than one area where the works would take place outside of a Root Protection Area. Veteran Trees – Nine veteran trees were recorded in the targeted survey area (with no ancient trees being observed. The proposed development will not result in the loss or pruning of veteran trees. TPO Trees – The proposed development will not result in the loss or pruning of TPO Trees, as all works are either outside of the 15m buffer zone, or do not encroach into their RPA. 9.60 The report confirms that Work No. 2 Cables may require up to 89 trees to be removed, whereas the BESS and substation do not require any trees to be removed. The new access, passing place and associated visibility splays may require up to 9 trees to be removed, although this is considered a worst case scenario. 9.61 In addition, the report also notes that a total of 98 trees will be affected by works, 28	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	individual trees and 70 trees that are part of groups or partial groups. 9.62. In respect of Hedgerows, the report confirms that the permanent loss of hedgerows associated with fencing, access, and new roads/tracks to an amount of 1,308m. Further to this hedgerow losses caused by cables is detailed as being 1,908m but are judged to be 'temporary' because the hedgerows will be reinstated or translocated.	
<i>Mitigation</i>		
9.63	9.63 The report acknowledges that tree and hedgerow losses will be compensated through planting proposals as outlined in the Outline LEMP which in summary would comprise: • 31 ha of new woodland creation; • 8.5 ha of wood pasture creation; • 50 km of species-rich hedgerow creation; and • Scattered, individual trees.	This is noted.
<i>Local Policy - Allocations and Development Management DPD 2013</i>		
9.64 – 9.65	9.64 Policy DM5 (Design) states as follows.	This is noted. The location and specification of compensatory hedgerow and tree planting will be confirmed in the final LEMP, therefore allowing

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	Trees, Woodlands, Biodiversity & Green Infrastructure - In accordance with Core Policy 12, natural features of importance within or adjacent to development sites should, wherever possible, be protected and enhanced. Wherever possible, this should be through integration and connectivity of the Green Infrastructure to deliver multi-functional benefits. Supporting text states: Features of natural importance such as trees and hedges significantly contribute to the landscape character of the District and can also be used to help integrate new development into it. Where a site contains or is adjacent to such features, proposals should take account of their presence and wherever possible incorporate or enhance them as part of the scheme of development in order to improve the connectivity of the Green Infrastructure. Where it is proposed to remove features, justification will be required, and re-planting should form part of development proposals. 9.65 Whilst the Applicant has set out a significant programme of new planting, there is no guarantee that such additional planting will	for feedback from NSDC, following the finalisation of the Development Design and completion of any necessary pre-commencement surveys.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	take place in and around where existing trees or hedgerows will be lost. Further discussion is required to ensure that the value of existing trees to be lost, is reflected in any replanting programme.	

Table 3-3 Responses to NSDC Comments on Noise and Vibration

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Baseline</i>		
10.1 – 10.2	10.1 Baseline noise conditions have been determined through a baseline noise measurement survey which was carried out between Monday 15th April and Tuesday 23rd April 2024. The survey was designed to capture noise levels across the Order Limits during the daytime (0700 hrs to 2300 hrs) and night time (2300 hrs to 0700 hrs) periods using monitoring locations which are representative of the assessed receptors. 10.2 The existing noise environment was found to be affected by traffic noise on the A1, A616	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	and A617, as well as train movements on the East Coast Mainline.	
<i>Assessment</i>		
10.3 – 10.6	10.3 A study area has been defined for each phase of the development, with receptors within this area considered for assessment. Outside of this study area, noise from the development is not considered to be significant. 10.4 Noise impact has been assessed in line with Planning Practice Guidance for Noise (PPG(N)) and The Noise Policy Statement for England (NPSE). Construct Traffic was assessed based upon Design Manual for Roads and Bridges LA 111 'Noise and Vibration' (DMRB LA 111) and the Institute of Environmental Management and Assessment (IEMA) Guidelines for Environmental Noise Impact Assessment (ENIA Guidelines), construction noise following BS 5228-1 (2014), and operational noise BS4142 (2019). 10.5 Assessment has been undertaken both without and taking account of mitigation. Mitigation measures identified include:	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	Construction Environmental Management Plan (CEMP): This plan includes measures to control noise and vibration during construction activities. It includes scheduling noisy activities during less sensitive times of the day, using quieter equipment and machinery, implementing noise barriers and enclosures around noisy equipment. Construction Traffic Management Plan (CTMP): This plan aims to minimise noise from construction traffic by designating specific routes for construction vehicles, limiting the speed of vehicles, scheduling deliveries to avoid peak traffic times. 10.6 At present, only outline management plans have been produced, pending final development details. Additionally, a Construction Noise Management Plan (CNMP) will be developed based upon finalised location and equipment details and submitted prior to commencement of works.	
<i>Operational Phase</i>		
10.7	10.7 The development has been planned as far as possible to maximise distances from receptors to substation and BESS areas. Acoustic fencing is proposed within work area	Agreement noted that the development has been planned as far as possible to maximise distances from receptors to substation and BESS areas.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	5. Final details of plant have not yet been confirmed, as a result of which the final location, orientation and mitigation of plant may need to be amended. An operational noise assessment based upon finalised details is to be submitted prior to commencement of each phase of development.	
<i>Local Policy</i>		
10.8 – 10.9	10.8 The NSDC Allocations and Development Management Development Plan Documents (ADMPD) as adopted in July 2013, includes Policy DM4 – Renewable and Low Carbon Energy Generation, seeks to ensure that benefits of such development are not outweighed by any detrimental impacts, upon various issues, but with point 4 of the policy referring to Amenity, including noise pollution, shadow flicker and electro-magnetic interference. 10.9 Taking account of the wording of policy DM4, as noted in the explanatory text of the policy, proposals should take account of impacts generated during the preparation and installation process and those arising thereafter. At this stage, it is noted that the output of the Environmental Assessment work	This is noted. Section 6.6 of the Planning Statement [EN010162/APP/5.4B] sets out an analysis of compliance with the NPS policies of EN-1 and EN-3 well as the National Planning Policy Framework ('NPPF') and local policies.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	indicates that construction noise and vibration is judged to be not significant, and operational noise is assessed as being not significant, with the imposition of mitigation. As such, the impacts in respect of noise are expected to be neutral, although this is an interim conclusion, based upon the available information and noting that the Draft DCO contains requirement 15 which will provide further information on operational noise impacts.	

Table 3-4 Responses to NSDC Comments on Air Quality

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Baseline</i>		
11.1 – 11.3	11.1 In respect of Air Quality, NSDC have reviewed Chapter 16 (Miscellaneous Issues) of the ES, which considers air quality impacts associated with the proposed development. 11.2 Turning first to traffic movements, NSDC note that Construction traffic emissions have been scoped out due to predicted vehicle	This is agreed.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	movements being below IAQM/EPUK guidance threshold limits. 11.3 In respect of the potential for dust The assessment appropriately uses IAQM methodology to consider dust impact risks. Following identification of potentially sensitive receptors, the dust risk is considered and is deemed to be low to medium. Dust mitigation measures are proposed in the outline CEMP.	

Assessment

11.4 – 11.5	11.4 NSDC consider that a (in the absence of full details of mitigation measures proposed and the detailed design) detailed dust risk assessment and mitigation plan should be prepared and submitted for approval prior to construction and secured via a 'requirement' once the final layout is confirmed. In addition to the proposed mitigation this should include such matters as details of how, when and how often any monitoring will be carried out, how it is recorded and shared with stakeholders and by whom, should specify thresholds for action and should include contingency plans for unforeseen circumstances such as unseasonable high winds or exceptionally prolonged dry periods, a site contact name and	This was proposed in paragraph 70 of ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059], but hadn't been carried through into the outline CEMP ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B]. The Outline CEMP has been updated at Deadline 2 to include a commitment in Section A5.3.7 to update the dust risk assessment based on the detailed design, together with the NSDC-requested "details of how, when and how often any monitoring will be carried out, how it is recorded and shared with stakeholders and by whom, should specify thresholds for action and should include contingency plans for unforeseen circumstances such as unseasonable high winds or exceptionally prolonged dry periods". The Outline CEMP already includes a requirement for the final CEMP to provide a point of contact for the Development in case of complaints or concerns.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	number should be displayed at each site entry point and should be contactable to discuss any concerns or complaints. 11.5 Non-Road Mobile Machinery (NRMM) has been considered further within the assessment and Chapter 16 of the ES states that the use will be limited to short periods in any location.	This is agreed.
<i>Mitigation</i>		
11.6	11.6 An outline Construction Environmental Management Plan (oCEMP) has been submitted which lists generic air quality and dust mitigation measures. It is expected that this will be refined and shall include some site-specific measures for later iterations.	This is correct, and the ES Volume 4, Appendix 5.3: Outline Outline Construction Environmental Management Plan (CEMP)[EN010162/APP/6.4.5.3B] has been updated at Deadline 2 to include provision as set out above, in response to NSDC's point 11.4.
<i>Local Policy</i>		
11.7	11.7 The ADMDPD, includes Policy DM10 – Pollution and Hazardous Materials, which seeks to manage proposals which have the potential for pollution and manage impacts on health, the natural environment and general amenity in respect of (amongst other things) Air Quality. Whilst there is further information that is expected to be made available in due course, impacts on Air Quality are expected to	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	be neutral, with the appropriate best practice mitigation measures in place.	

Table 3-5 Responses to NSDC Comments on Ground Conditions and Contamination

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Baseline – Contamination</i>		
12.1 – 12.2	12.1 In respect of Ground Conditions and Contamination, NSDC have reviewed the Preliminary Risk Assessment (PRA) report (Study Areas 1-8) as contained in Volume 4 – Technical Appendices of the ES. This includes an environmental screening report, an assessment of potential contaminant sources, a brief history of the site's previous and current uses and a description of the site walkover. 12.2 The PRAs for Study Areas 1–8 follow current guidance including EA's Land Contamination Risk Management (LCRM). The Conceptual Site Models (CSMs) are well-structured and identify plausible contaminant linkages.	This is agreed.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Assessment</i>		
12.3 – 12.5	12.3 The Detailed Desk Study (Stage 2), also as contained in Volume 4 – Technical Appendices of the ES identifies medium to high risk in Study Areas 2, 7, and 8. This is recommended to be mitigated by the use of tool-box talks, inclusion of UXO in the Contractor's Risk Assessments and Emergency Response Plans. Debdale Tip in Parcel 4 is now outside of the order limits and therefore will not be subject to any further investigation. 12.4 Potential human health contaminant receptors (which lie in the NSDC administrative area) are limited to existing neighbouring residential properties given that risk to site workers falls within the developer's health and safety obligations. 12.5 A 'Discovery Strategy' protocol is recommended for contamination and NSDC note that at present there is a draft requirement (17) within the Draft DCO to capture the additional work to be undertaken. We would wish to make further representations on the wording of this condition as currently drafted in due course, to ensure the usual	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	validation/verification process is captured to demonstrate any necessary remediation has been successfully implemented. Furthermore, any contamination identified should require all phases of investigation, remediation and verification as stipulated in the EA LCRM guidance.	

Table 3-6 Responses to NSDC Comments on Agricultural Land Classification

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
13.1 – 13.2	13.1 Turning to the issue of Agricultural land classification, NSDC have received advice from its externally appointed advisors on the technical elements of the soil survey investigative work (in respect of the Best and Most Versatile Agricultural Land) and in this regard wish to make the following key observations. 13.2. This has included the review of Chapter 17 of the ES and the associated Technical Appendix within Volume 4 of the ES, which contains the Agricultural Land Classification Report (Parts 1 and 2).	The Applicant confirms that an Agricultural Land Classification (ALC) survey has been undertaken across approximately 1,690 hectares in accordance with Natural England guidance and following consultation with Natural England. In site design, the Applicant has sought to minimise the use of higher quality agricultural land, informed by Natural England mapping and the detailed ALC survey findings. Originally 25ha of Grade 1 land was identified and has been avoided and has not been included in the site design, and the area of Grade 2 has been reduced. An ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2A] has been submitted and provides a framework for soil protection during construction, operation, and decommissioning.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	• A detailed base line ALC has been undertaken across 1,690 hectares, following Natural England consultation, in detail at a standard density of 1 auger bore per hectare. • 62% of the site is BMV quality, based on a detailed survey, BMV is mainly Grade 3a. • The Applicant state they have avoided siting on the highest-grade land based on data provided by Natural England, but 8% of the land is identified as of Grade 2. • An Outline Soil Management Plan is provided and includes sections on construction, management, and decommissioning. The decommissioning bond is stated to guarantee funding for the removal of equipment after 40 years. • The cable routes have also been ALC surveyed, and the details reported, the methodology was agreed with Natural England. The cable routes are similar quality to the overall site. • It is noted that the Applicant states that local farmers will graze sheep under and around the solar PV arrays, where practicable. Given this is likely influenced by the future economics of farming, the Applicant should set out in clear	The cable routes have been subject to the same ALC methodology agreed with Natural England. With regard to sheep grazing, the Applicant considers this to be a realistic and deliverable form of ongoing agricultural use, consistent with comparable operational solar developments. Further details are provided in the ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1B], including on grazing densities. The use of solar array areas for grazing is established, with over half of solar areas that are part of agricultural businesses being grazed. Details of graziers are not known at this stage. In relation to soil health post-decommissioning, the temporary and reversible nature of the development ensures that land can be returned to full agricultural use. The Applicant notes NSDC's conclusion that impacts on soil health, food production, and affected agricultural holdings are low. After decommissioning the land will be returned to the landowners. There will be no control over the land management practices after that.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	terms a minimum acreage of land that would be available for grazing and how access would be obtained for such ongoing use, given security considerations for the site. Moreover, as this is a potential benefit in the continuation of some form of agricultural activity, we would expect the Applicant to demonstrate there is both a commercial demand for grazing use across the site, that it can be delivered and if so, how that would be secured within the Development Consent Order. • It is further noted that removing intensive farming is considered to eliminate nitrates and phosphates, supporting soil health, biodiversity and improving water quality. However, there is no detail as to if and how improved soli health will be maintained after the decommissioning stage, including the financing of any ongoing programme that may be necessary. • There is some soil health assessment and assessment of loss of land for food production and the impact on any agricultural holdings affected is also addressed. Overall, the impact is considered low in all cases.	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Local Policy</i>		
13.3 – 13.4	13.3. Spatial Policy 3 of the Amended Core Strategy – Rural Areas, deals with agriculture, stressing the need to protect agriculture in developments within a rural setting. 13.4. As such, NSDC note that a total of 62% of BMV land will be impacted by the proposed development, of which 8.5% is classified as Grade 2 Land. Whilst the Applicant notes that this is for a temporary period (as also referred to below in respect of cumulative impacts) the proposed development has a long operational lifespan of 40 years, which establishes a degree of permanence. NSDC are very concerned about the impacts on BMV land. NSDC suggest that the Applicant demonstrate how other areas of land have been considered that may have involved a lower degree of BMV land. NSDC particularly take the view that loss of Grade 2 (Very Good Agricultural Land) land should be avoided. As such, NSDC consider that only Grade 3a and Grade 3b (or lower grade quality) should be utilised, on the basis of the long-term loss of such valuable land for food production purposes. Further to this, we consider the Applicant should set out to what	Please refer to Section 6.8 of the Planning Statement [EN010162/APP/5.4B] where the Applicant has addressed the Development against relevant planning policy in respect of agricultural land and food security. Spatial Policy 3 of the Amended Core Strategy relate to planning applications rather than development consent applications for NSIPs and the tests within it are considered to be in conflict with the policy set out in NPS EN-3. In accordance with paragraph 4.1.15 of NPS EN-1 where there is a conflict between a Local Plan and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the Project. As set out in '<i>Table 2-2 Further action points raised during the hearing and the Applicant's post-hearing response</i>' of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], the Development has assumed the most efficient technology that can be reasonably be expected to be available at the time of construction. The Development has a grid connection date of 2028, which means that construction would take place as soon as practicable following the grant of development consent. The Applicant does not consider that there are likely material changes in the available technology between now and when construction would be expected. The assumptions set out in the ES has assessed the maximum parameters of the Development, and the Applicant is confident that any changes to

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	extent (perhaps as part of the ongoing maintenance programme) any of the PV areas could be scaled back over the operational life of the proposed development, reflecting continuing improvements in technology, which presents potential to return high value BMV land to agricultural use and brings additional benefits in scaling back the impacts of the proposed development.	technology that may arise within the foreseeable future can be accommodated within the defined Rochdale Envelope.

Table 3-7 Responses to NSDC Comments on Built Heritage

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Assessment of significance</i>		
14,1 – 14.3	There are twenty-four heritage assets that have been identified as significant and that will be impacted by the proposed Great North Road Biodiversity Solar Park within the NSDC area. The Nottinghamshire County Council Historic Environment Record (HER) and Historic England National Heritage List has been used to cross reference the thirteen heritage assets scoped in for assessment as potentially sensitive receptors (Chapter 11 –	Noted

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	Cultural Heritage and Archaeology of the Environmental Statement). Eleven additional heritage assets have been included (with some of these assets being grouped together), as there is the potential for the proposal to impact their setting and it has been considered that clear and convincing justification for scoping out these assets has not been provided. 14.2. The heritage assets with the most likelihood of being directly impacted are Maplebeck Conservation Area, Kersall Conservation Area and Averham park and garden, the Park at Carlton Hall and the Park at Ossington Hall. (Non-Designated Heritage Assets). Part of the Maplebeck is situated within the order limits of the proposal. There are five listed buildings within Maplebeck, one being a Grade I listed Church. The proposed solar arrays would lie adjacent to Kersall, and part of the solar arrays will lie within the boundary of Averham park and garden, the Park at Carlton Hall and the Park at Ossington Hall. Four of the additional heritage assets (numbers 14-17) are located further away from the other heritage assets listed, and are all Grade II, with one Non-Designated Heritage Asset.	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	14.3. There are eleven heritage assets in Chapter 11 of the Environmental Statement (page 85) which have been identified as being located within close proximity to construction access. There would be no direct impact on these assets, and due to the temporary nature of the works, these have not been included in this assessment.	
<i>Impact</i>		
14.4 – 14.5	14.4. There are twenty-four heritage assets that have been identified (as indicated below), which are within proximity to the order limits boundary and would be impacted by the proposal. The heritage assets listed from 14 to 24 are comprised of the eleven heritage assets which have been added to the list of heritage assets scoped in for assessment in Chapter 11. 1. Maplebeck Conservation Area; 2. Eakring Conservation Area; 3. Kersall Conservation Area; 4. Kelham Conservation Area; 5. Settlement W of Cromwell Village Scheduled Monument (1013490);	Addition of assets 14 to 24 noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	6. Willoughby Deserted Medieval Village Scheduled Monument (1013884); 7. Civil War Landscape and Scheduled Monuments; 8. Kelham Lodge Farmhouse Grade II (1370135); 9. Averham Park House Grade II* (1046003); 10. South Farm Grade II (1046004); 11. Grange Farm House Grade II (1046010); 12. North Park House Grade II (1179405); 13. Moorhouse Chapel Grade II* (1045631); 14. Church Farmhouse Grade II (1045632); 15. Park Lidget Grade II (1045962); 16. Beesthorpe Hall, Stable and parkland Grade II (1045977 and 1045978); 17. Edgefield House Hotel and Boundary Wall Grade II (1369986); and Coach house and wall at Edgefield House Hotel Grade II (1045947); 18. Rufford Abbey Park and Garden Grade II (1001085);	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	19. Thurgarton Hundred Workhouse (Grade II *) (1001591) 20. Newark Castle Gardens (Grade II) (1001318); 21. Park at Carlton Hall (Non-Designated Heritage Asset); 22. Park at Ossington Hall (Non-Designated Heritage Asset); 23. Winkburn Park (Non-Designated Heritage Asset); 24. Park at Kelham Hall (Non-Designated Heritage Asset).	

Assessment of impact on each heritage asset identified and mitigation measures

1. Maplebeck Conservation Area

	<u>Impact of Proposal</u> Maplebeck's Conservation Area (CA) is notable for its compact village form and strong sense of enclosure created by mature trees and boundary walls. Key features include the Grade I St. Radegund's Church (1045596), Grade II Maplebeck House (1045597), Grade II Maplebeck Farmhouse (1370160), Grade II Low Farmhouse (1370159), and a Grade II listed telephone kiosk (1396379). The	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the relevant SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	prevailing vernacular comprises traditional cottages and farmhouses, typically constructed in brick and stone. The surrounding farmland and wooded slopes enhance the rural, tranquil setting. Conservation priorities include preserving original materials, protecting views across open countryside, and managing modern interventions sensitively. The order limits encircle the CA and extend slightly within the edges at the north-eastern and western boundaries. Proposals to the north and south of the CA would comprise of cable routes only, with the solar array areas proposed 650m to the north, 300m to the south-east, and 400m to the west. It is stated in the assessment of the CA within Chapter 11 that the 'assets within the Conservation Area do not derive their significance from the wider surroundings'. However, the views into and out of the CA contribute to the character and appearance of the CA and the setting of its heritage assets. It is noted that the topography of this area will limit some views, and a viewpoint (Viewpoint 5) is to be provided. The predicted changes note that there will be views of solar PV areas on the skyline to the north-east.	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<u>Recommended Mitigation</u> It has already been proposed to implement mitigation measures between the CA boundary and the PV array areas, although details of the mitigation have yet to be provided. It is noted in Viewpoint 5 that mitigation planting around the solar PV areas would screen the edges of the Solar PV areas, although views of the panels would remain visible along the skyline to the north-east. We would recommend that in areas where the use of planting would not conceal the solar panels, that the panels are removed from these areas. Increased planting of trees and hedgerows would be recommended to mitigate the impact as much as possible.	
2. Eakring Conservation Area		
	<u>Impact of Proposal</u> Eakring's Conservation Area (CA) reflects its medieval origins, with a distinctive street pattern and sunken lanes that define the village core. The Grade II* St. Andrew's Church (1370132), dating from the 15th century, anchors the settlement, while traditional brick cottages and farmhouses contribute to its rural character. The surrounding landscape of	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	rolling hills and open fields enhances the area's setting. There are six Grade II Listed Buildings, comprised of farmhouses, cottages, a windmill, and a war memorial. Conservation efforts prioritise retaining original building forms, safeguarding views, and managing development to respect the village's heritage. Eakring remains a tranquil settlement with deep historical roots. Key views are from the north and north-east of the CA, where there is a rise in topography. The nearest point of the order limits is proposed to be 270m from the east of the CA boundary, there is a proposed buffer of at least 250m between the CA and the solar array. Due to proximity, there would be glimpsed views of the solar arrays. <u>Recommended Mitigation</u> It is noted that there is an existing tree belt which limits views from the eastern edge and the rise in topography limits views. Additional screening in the form of trees and hedgerows should be implemented, particularly where planting is not already in place.	

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
3. Kersall Conservation Area		
	<u>Impact of Proposal</u> Kersall's Conservation Area (CA) reflects its agricultural heritage, with scattered farmsteads and cottages grouped around narrow lanes. The rural setting is reinforced by open fields, mature hedgerows, and woodland on higher ground. Conservation priorities include retaining original building forms, protecting views across farmland, and managing change to maintain the village's sense of place. Kersall exemplifies NSDC's commitment to preserving its historic rural landscapes. The proposed solar arrays will lie adjacent to the eastern edge of the CA, there would be views of the solar PV areas which would impact the wider open rural setting of the CA. <u>Recommended Mitigation</u> It is acknowledged that mitigation measures are proposed, although it is noted in Viewpoint 6 and Viewpoint 7 that the solar array areas would still be visible once the proposed mitigation measures are in place. We would suggest that adequate planting is used to mitigate the visual impact as much	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the relevant SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	possible. Where mitigation cannot screen the proposed solar PV areas, the panels should not be implemented/should be reduced.	
4. Kelham Conservation Area		
	<u>Impact of Proposal</u> Kelham's Conservation Area (CA) is dominated by the Grade I Kelham Hall, a Victorian country house of exceptional architectural interest, set within landscaped parkland. The village core includes traditional cottages, farmhouses, and the Grade I St. Wilfrid's Church, all arranged along narrow lanes. Mature trees and open spaces enhance the setting, while views across the Trent Valley add scenic value. Conservation objectives focus on preserving the hall and its associated buildings/structures within its grounds, safeguarding historic street patterns, and managing development sensitively. The order limits are proposed 30m from the northernmost extent of the CA boundary, with a BESS area proposed 500m to the west of the CA. It is noted that the BESS will not be appreciable from the historic core of the CA. <u>Recommended Mitigation</u>	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the relevant SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	Ensure that trees and hedgerows are used to mitigate visual impact, particularly around Kelham Hall and its associated grounds. Further details of this mitigation should be provided.	
5. Settlement W of Cromwell Village Scheduled Monument (1013490)		
	<u>Impact of Proposal</u> This Scheduled Monument consists of buried archaeological remains with no surface expression. The nearest proposed PV solar array is located 1.3km north-west of the Scheduled Monument. <u>Recommended Mitigation</u> This heritage asset should be considered as part of archaeological assessment rather than built heritage.	Noted
6. Willoughby Deserted Medieval Village Scheduled Monument (1013884)		
	<u>Impact of Proposal</u> The Scheduled Monument is comprised of visible earthworks and is considered to be of archaeological significance. There is proposed	Noted

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	to be PV arrays within close proximity to the asset. <u>Recommended Mitigation</u> This heritage asset should be considered as part of archaeological assessment rather than built heritage.	
7. Civil War Landscape and Scheduled Monuments		
	<u>Impact of Proposal</u> The Scheduled Monument comprises of earthworks associated with the Civil War defences, which is of historic and archaeological interest. The nearest PV arrays are proposed 2km away from the asset and cable routes will avoid direct impact to the Monument. <u>Recommended Mitigation</u> This heritage asset should be considered as part of archaeological assessment rather than built heritage.	Noted
8. Kelham Lodge Farmhouse (1370135)		
	<u>Impact of Proposal</u>	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	The Grade II listed farmhouse dates to the latter half of the 18th Century. The setting has historically been formed of agricultural land, associated with its historic use as a farmhouse. The order limits lie immediately east, approximately 100m beyond the A616. A proposed area of Solar PV arrays is proposed 600m south of the asset. Where the A616 dissects the wider landscape, there are hedgerows which are proposed to limit visibility, and this modern intervention has already altered the agricultural setting. However, there will still be glimpsed views of the arrays at a distance. As such, there would be a visual impact to the setting of the asset. <u>Recommended Mitigation</u> We would suggest increasing planting of trees/hedgerows to prevent visual impact.	[EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the relevant SoCG accordingly.

9. Averham Park House (1046003)

	<u>Impact of Proposal</u> The Grade II* Listed Building dates to the 18th Century and sits within the Averham Park Unregistered Park and Garden Nottinghamshire HER ref: MNT26653), a Non-Designated Heritage Asset. Formerly, the park	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	and garden would have made a larger contribution to the significance of the asset (house), but given its current agricultural use, it no longer has a functional relationship with the former hunting lodge. The nearest solar array is proposed to be located 400m north-west of the Listed Building, but solar arrays will sit within the northern and north-west boundary of the park and garden itself. Therefore, the proposal would have a direct impact to the significance of the Non-Designated Heritage Asset. <u>Recommended Mitigation</u> The impact of the proposal on the Non-Designated Heritage Asset needs to be considered. We would suggest that solar panels within the boundary of the park and garden are removed and screening through trees and hedgerows are used along the northern and north-west boundary of the park and garden to reduce the visual impact.	
10. South Farm (1046004)		
	<u>Impact of Proposal</u> The Grade II farmhouse dates to c.1720 and was formerly connected to Averham Park	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	(1046003) through a cellar at the east end and sits within the Averham Park park and garden. The closest part of the order limit is 220m from the asset and the nearest solar arrays are proposed 400m to the north-west. <u>Recommended Mitigation</u> As discussed in the recommended mitigation for Averham Park House, the impact of the proposal on the Non-Designated Heritage Asset needs to be considered. We would suggest that solar panels within the boundary of the park and garden are removed and screening through trees and hedgerows are used along the northern and north-west boundary of the park and garden to reduce the visual impact.	assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the SoCG accordingly.
11. Grange Farm House (1046010)		
	<u>Impact of Proposal</u> The Grade II listed farmhouse originally dates to the 16th Century, with a 19th Century service addition. The nearest part of the order limits is proposed 360m south-east of the asset, with no proposed solar arrays within the vicinity.	Noted

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<u>Recommended Mitigation</u> None would be required for this heritage asset.	
12. North Park Farmhouse (1179405)		
	<u>Impact of Proposal</u> The Grade II farmhouse and adjoining farm buildings dates to the 18th Century. The closest part of the order limits is located 30m from the asset, which will provide access and cable routes. The nearest solar arrays are proposed 120m to the west of the asset. <u>Recommended Mitigation</u> It is acknowledged that an area of mitigation/enhancement is proposed to run between Moorhouse Road and the start of the array area, with planting to screen the panels from view. The use of screening through planting is encouraged.	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the SoCG accordingly.
13. Moorhouse Chapel (1045631)		
	<u>Impact of Proposal</u> The Grade II* chapel was constructed in 1860 in a French Gothic Revival style. The chapel is located 100m from the proposed order limits,	The Applicant maintains that the assessment presented in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] identifies the significance of the effects on the identified heritage assets as a result of changes within the setting of those

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	which will form an access route. Chapter 11 notes that the nearest PV array area will be located approximately 500m to the east of the heritage asset. It is acknowledged that there are existing hedgerows which will partially screen the proposed solar arrays, although they will still be visible. <u>Recommended Mitigation</u> Further consideration should be afforded to how the proposed development impacts on the setting of this important heritage asset. Planting more trees and hedging to further screen views onto the site would further protect the setting of the heritage asset.	assets. The Applicant will engage with NSDC on the subject of mitigation and will develop the SoCG accordingly.
14. Church Farmhouse (1045632)		
	<u>Impact of Proposal</u> The Grade II listed farmhouse dates to the early 18th Century. The setting has historically been formed of agricultural land, associated with its historic use as a farmhouse. This contributes to its historic significance. While it is acknowledged that the order limits would be approximately 50m away and the closest panels would be over 520m from the site – thus not encroaching on the immediate setting	The Applicant notes that this asset was identified during statutory consultation and that a review of the initial Settings Assessment Scoping Exercise was subsequently carried out. The review produced no change to the initial conclusions and the asset remained scoped out of the ES Volume 4, Appendix A11.2: Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.1] [APP-255] submitted with the ES. The Applicant will engage with NSDC on this subject and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	- we would wish to ensure that any potential visual impact is mitigated. Clear and convincing justification has not been provided for scoping out this asset from further assessment. <u>Recommended Mitigation</u> We would recommend that the visual impact of the proposal on this heritage asset is assessed fully and would suggest that any visibility is mitigated through the planting of trees and hedgerows.	
15. Park Lidget (1045962)		
	<u>Impact of Proposal</u> The Grade II farmhouse dates to the 18th Century. The surrounding agricultural land, which has been present throughout the history of the farmhouse, contributes to its historic significance. The order limits are located 513m away and may not directly affect the heritage asset, however, there is the potential for visual impact. <u>Recommended Mitigation</u> We would require clear and convincing justification for scoping out further assessment	The Applicant notes that this asset was identified during statutory consultation and that a review of the initial Settings Assessment Scoping Exercise was subsequently carried out. The review produced no change to the initial conclusions and the asset remained scoped out of the ES Volume 4, Appendix A11.2: Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.1] [APP-255] submitted with the ES. The Applicant will engage with NSDC on this subject and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	of this heritage asset, as there is the potential for the proposal to impact its setting. We would suggest that any visual impact is mitigated through the planting of trees and hedgerows.	
16. Beesthorpe Hall, Stable and parkland (1045977 and 1045978)		
	<u>Impact of Proposal</u> The Grade II Beesthorpe Hall and Attached Cottage dates to the 17th Century and the Grade II Stables were a later addition constructed in the 18th Century. These Listed Buildings also form part of the significance of the surrounding parkland, a Non-Designated Heritage Asset (Nottinghamshire HER ref: MNT26658). The key setting that contributes to these assets is the immediate surrounding grounds, however, the wider agricultural setting which was present throughout the history of the heritage assets, also contributes to their historic significance. The proposed solar panels have the potential to be visible to the north-west and south-west of these heritage assets. <u>Recommended Mitigation</u> It is noted that it is proposed, as part of the Landscape Masterplan (Figure 5.2), to include	The Applicant notes that this asset was identified during statutory consultation and that a review of the initial Settings Assessment Scoping Exercise was subsequently carried out. The review produced no change to the initial conclusions and the asset remained scoped out of the ES Volume 4, Appendix A11.2: Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.1] [APP-255] submitted with the ES. The Applicant will engage with NSDC on this subject and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	a hedge/tree belt along the boundary of the order limits at the south-west, which would help to mitigate the potential visual impact. However, we also would suggest adding additional screening of trees and hedgerows along the boundary of the Order Limits surrounding the proposed solar panels located north-west of the site. We would also suggest a more detailed assessment of the heritage assets would be required to determine the impact and whether the mitigation measures proposed would be sufficient.	
<i>17. Edgefield House Hotel and Boundary Wall (1369986) and Coach house and wall at Edgefield House Hotel (1045947)</i>		
	<u>Impact of Proposal</u> These Grade II Listed Buildings date to c.1863 and have a group value. The order limits are located 48m from the heritage asset and the proposed solar arrays are 350m north of the heritage assets, as such, there is the potential for impact to the setting of these Listed Buildings. <u>Recommended Mitigation</u> We would suggest that further assessment of the potential impact of the proposal on the heritage assets is conducted.	The Applicant maintains that ES Volume 4, Appendix A11.2: Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.1] [APP-255] has been carried out using appropriate guidance and professional skill and adequately sets out the reasons for scoping out this asset. The Applicant will engage with NSDC on this subject and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>Impact on Registered Parks and Gardens</i>		
	The Environmental Statement Volume 4 – Technical Appendices (Technical AppendixA11.2: Settings and Assessment Scoping Exercise (Doc Ref: EN010162/APP.6.4.11.2 Rev No 1 June 2025) identifies 1 Grade II Registered Park and Garden within 2km of Order Limits.	
<i>18. Rufford Abbey (Grade II) (1001085)</i>		
	<u>Impact of Proposal</u> The Order Limit is 2km from the boundary of the RPG and no assessment has been made on the impact of the proposals on the RPG that is outside the immediate surroundings of the Abbey. This needs to be provided so that the long distance visual impacts can be accurately assessed. <u>Recommended Mitigation</u> We would require clear and convincing justification for scoping out further assessment of this heritage asset, as there is the potential for the proposal to impact its setting. We would	Rufford Abby RPG was assessed in Table 2 of ES Volume 4, Appendix A11.2: Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.1] [APP-255] as part of a group with the remains of the Cistercian Abbey and the more recent Grade I and II* listed buildings which are located within the RPG. The proximity of the eastern boundary of the RPG to the Order Limits is noted. The Applicant will engage with NSDC to agree the Impacts on this asset and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	suggest that any visual impact is mitigated through the planting of trees and hedgerows.	
<i>19. The above document scoped out the impact of the proposal on Thurgarton Hundred Workhouse (Grade II *) (1001591) - distance of Greet House from Order Limits 2.27km.</i>		
	<u>Impact of Proposal</u> The proposals do not form part of the surroundings within which this RPG can be experienced and therefore change within the Order Limits will not alter the ways in which the significance of this asset is experienced or appreciated. <u>Recommended Mitigation</u> None.	Noted
<i>20. The above document scoped out the impact of the proposal on Newark Castle Gardens (Grade II) (1001318) - distance of Newark Castle from Order Limits 2.9km</i>		
	<u>Impact of Proposal</u> The Order Limit is situated 2.9km from this RPG and with modern development between the RPG and the surrounding landscape. The areas closest to the RPG are proposed for cable routes and impacts from these elements will not result in the setting of the RPG being altered on a permanent basis. However, there	The Applicant notes that the proposed viewing platform postdates the design development which removed substantial areas of PV arrays within the area of developable land near to the asset in question. The conclusions in the ES Volume 4, Appendix A11.2: Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.1] [APP-255] took into account the final design and predated the construction of the viewing platform. The applicant maintains that the distance from the development and the intervening urban built form remain relevant to understanding the impacts from the development on this asset.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	is an external viewing platform is currently being constructed on the top of Newark Castle that will allow up to 30 people at a time to enjoy much longer distance views over the surrounding countryside. The impact of the solar panels themselves on this view and experience of the castle has not been assessed and is required to be assessed. <u>Recommended Mitigation</u> We would require clear and convincing justification for scoping out further assessment of this heritage asset, as there is the potential for the proposal to impact its setting in long distance views from the asset and would detract from its experience and enjoyment. We would suggest that any visual impact is mitigated through the planting of trees and hedgerows. Impact on Historic Landscapes and Historic Park and Gardens (Averham Park and Beesthorpe Park have been considered above)	Notwithstanding this the applicant will engage with NSDC on this subject and any agreement will be reflected in the SoCG.
21. Park at Carlton Hall (Non-Designated Heritage Asset)		
	<u>Impact of Proposal</u>	The effects of the project on the non -designated designed landscape at Carlton Hall assessed in the ES Volume 2, Chapter

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	The proposal sits within Field Nos. 59, 61-63 which are situated within the boundary of this Park. The designed landscape forms an integral part of the heritage of Newark and Sherwood. Therefore, the proposal would have a direct impact to the significance of the Non-Designated Heritage Asset. <u>Recommended Mitigation</u> The impact of the proposal on the Non-Designated Heritage Asset needs to be considered. We would suggest that solar panels within the boundary of the park and garden are removed and screening through trees and hedgerows are used along the appropriate boundaries of the park and garden to reduce the visual impact.	11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] in table 11.6. This assessment concluded that the effects on the significance of the asset from the development would be minor. The Applicant will engage with NSDC on the subject of mitigation and will develop the SoCG accordingly.

22. Park at Ossington Hall (Non-Designated Heritage Asset)

	<u>Impact of Proposal</u> The proposal sits within Field Nos. 24, 25, 28-30 and 36 which are situated within the boundary of this Park. The designed landscape forms an integral part of the heritage of Newark and Sherwood. Therefore, the proposal would have a direct impact to the significance of the Non-Designated Heritage Asset.	The effects of the project on the non -designated designed landscape at Carlton Hall assessed in the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] in table 11.6. This assessment concluded that the effects on the significance of the asset from the development would be minor. The Applicant will engage with NSDC on the subject of mitigation and will develop the SoCG accordingly.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<u>Recommended Mitigation</u> The impact of the proposal on the Non-Designated Heritage Asset needs to be considered. We would suggest that solar panels within the boundary of the park and garden are removed and screening through trees and hedgerows are used along the appropriate boundaries of the park and garden to reduce the visual impact.	
23. Winkburn Park (Non-Designated Heritage Asset)		
	<u>Impact of Proposal</u> Although Figure 11.1.2 does not yet identify the boundary of Winkburn Park, within Ref 2.7.7 of the Draft Statement of Common Ground (Doc Ref: - EN010162/APP/8.2 Rev No 2 dated November 2025) it states that this Park has been excluded from further assessment as the setting of the asset does not extend to the Order Limit. However, this information has not been presented spatially as yet and without this information it is not possible to accurately assess the impact of the proposal on the Park accurately or provide comment on whether mitigation works would be required, at this stage.	Winkburn Park non-designated parkland (MNT26694) is mapped on the following figures which illustrate the ES Volume 4, Appendix A11.1: Archaeological Desk-Based Assessment [EN010162/APP/6.4.11.1]: Figure A11.1.5c Site, Study Area and HER data (Post-medieval) [APP-252] Figure A11.1.9c Site and (1888-1913) First Edition Ordnance Ordnance Historic Mapping [APP254]

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
<i>24. Park at Kelham Hall (Non-Designated Heritage Asset)</i>		
	<u>Impact of Proposal</u> Within Ref 2.7.7 of the Draft Statement of Common Ground (Doc Ref:- EN10162/APP/8.2 Rev No 2 dated November 2025) it states the impact of the proposal on the setting of this historic Park is still under discussion between the Applicant and NSDC. Once this is completed, consideration can be given as to whether mitigation would successfully deal with impacts.	Noted
<i>Summary and Conclusions</i>		
	The most impacted heritage assets are Maplebeck Conservation Area, Kersall Conservation Area, Averham Park park and garden, Park at Carlton Hall and Park at Ossington Hall. In these areas, we would suggest that areas of the proposed solar arrays are removed or reduced, to limit the direct impact to the heritage assets. Other heritage assets, as noted above, require additional assessment to ensure that the impact of the proposal on the assets has been fully considered. Whilst mitigation measures were	Noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	noted in Chapter 11, and the Landscape Masterplan (Figure 5.2) has depicted that trees and hedges would be utilised to reduce the visual impact on heritage assets, we would recommend additional screening and planting measures. Although the current mitigation measures may be appropriate for certain assets, if further information has been provided on the impacts upon these assets.	
<i>Local Policy</i>		
14.6.	The key policies within the local plan, include Core Policy 14 - Historic Environment of the Amended Core Strategy which seeks to ensure the continued conservation of the district's heritage assets and historic environment in line with their identified significance and in accordance with national policy. Policy DM9 - Protecting and Enhancing the Historic Environment notes that all development proposals affecting heritage assets should utilise appropriate siting, design, detailing, and methods of construction. In this regard, at present, NSDC do not anticipate any adverse impacts from the proposed development in respect of heritage assets, but in order to minimise the level of harm, there are a number	Noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	of mitigation recommendations, as outlined above.	

Table 3-8 Responses to NSDC Comments on Socio Economics

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
15.1 – 15.4	15.1. In respect of Socio Economics, Chapter 13 of the ES sets out the potential for direct and indirect job creation during the construction, operation, and decommissioning phases. Whilst job creation is noted as a potential positive benefit, any permanent direct employment is limited to 20 net FTE jobs during the operational lifespan of the proposed development. 15.2. Although construction jobs are likely to be more significant, with the creation of 173 FTE jobs during the construction phase, this is only considered to be a moderate benefit, given the temporary nature of the construction programme. 15.3. NSDC can confirm that some early and limited discussions have taken place with the	Noted. The latest position between the Applicant and NSDC on the matter raised in relation to job creation is set out at Table 2.8 of the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2A], at row Ref 2.8.4.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	Applicant at the Pre-application stages on the ways in which the economic benefits of the development (through job creation) could be secured (should permission be forthcoming). Moreover, we have recommended that the Applicant consider how they can work with other Applicants for other projects in the Nottinghamshire and Lincolnshire region to deliver such benefits. We note that this and other measures are presented in the Outline Skills, Supply Chain and Employment Plan (OSSCEP). 15.4. Without prejudice to any view that NSDC may take on the proposed development, this should be developed further during the examination stage, such that NSDC can understand the benefits of the proposed development in respect of potential job creation at the district level and how such potential jobs can be secured as direct and tangible employment on either a temporary or permanent basis.	
<i>Local Policy</i>		
15.5	15.5 Core Policy 4 of the Amended Core Strategy – Shaping our employment profile, seeks to strengthen and broaden the economy	Section 6.7 of the Planning Statement [EN010162/APP/5.4B] sets out policy testing for employment generation and other socio-economics benefits.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
	of the district and provide a diverse range of opportunities. The OSSCEP should be developed further to demonstrate how working with learning and training bodies, job centres and higher education to raise workforce skill levels can raise and improve employability. Noting the greatest beneficial impacts would occur in the construction stage and only very minor operational benefits, in order to demonstrate compliance with Core Policy 4, the mechanisms for delivery to ensure the benefits are deliverable, are an important part of the examination process.	ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] identifies and assesses the likely significant effects of the Development on socio economic and tourism resources. Measures are outlined in Section A13.2.1.2 of the ES Volume 4, Appendix A13.2: Outline Skills, Supply Chain and Employment Plan (OSSCEP) [EN010162/APP/6.4.13.2] [APP-274]. Paragraph 9 states that <i>'the Applicant will investigate measures to promote local people's take-up of jobs generated by the Development. The starting point will be engagement with Local Authorities and Job Centre Plus (which the Applicant has already begun) to tap into existing local employment support networks'</i>. Requirement 17 of Schedule 2 of the Draft DCO [EN010162/APP/3.1C] then requires that a skills, supply chain and employment plan is submitted to NSDC for approval before each phase can commence. This would then set out the precise details of how the measures in the ES Volume 4, Appendix A13.2: Outline Skills, Supply Chain and Employment Plan (OSSCEP) [EN010162/APP/6.4.13.2] [APP-274]. The Development therefore complies with NPS EN-1 policy assessed that the Proposed Development would not give rise to significant effects, or that those which may arise have been considered and adequately mitigated where possible. The Proposed Development would meet the requirements of the NPS and the NPPF and would accord with and the provisions of local policy.

Table 3-9 Responses to NSDC Comments on Summary and Conclusions

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
16.1	The purpose of this LIR has been to outline the likely effects of the Great North Road Solar Farm at a local level and to briefly evaluate these effects in the context of local planning policy and not to come to an overall balanced conclusion which is the responsibility of the Examining Authority.	This is noted.
16.2	Newark and Sherwood District Council (NSDC) note the need for Renewable Energy development and the wider benefits that this brings, but there are some specific and direct negative impacts associated with the proposed development including landscape and visual impacts, leading to a marked change in the character of the area and the loss of Best and Most Versatile Agricultural Land.	This is noted.
16.3	In addition, there are impacts around the potential loss of trees, other areas of potential impacts and areas of mitigation that require further development during the examination, so as to clearly understand the means to which more significant impacts associated with the proposed development will be suitably mitigated, including the mechanisms to ensure this mitigation is fully implemented.	This is noted.

LIR Para Ref.	Summary Position of Interested Party	Applicant's Responses
16.4	NSDC will continue to work proactively with the Applicant during the examination to understand the full impacts of the proposed development, including evidence of necessary mitigation to address any significant impacts, including the joint production of Statements of Common Ground.	This is noted.
16.5	NSDC has not undertaken a full review of the draft Development Consent Order at this stage and will suggest any necessary amendments at the appropriate time during the Examination.	This is noted.

4 WRITTEN REPRESENTATION – CATEGORY 2 STAKEHOLDERS

4.1 OVERVIEW

Written Representation

4.1.1 The following stakeholders have provided WRs for which responses have been provided:

- Averham Kelham and Staythorpe Parish Council
- BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd
- Buglife- The Invertebrate Conservation Trust
- Carlton-on-Trent Parish Council
- Councillor James Gamble
- CPRE Nottinghamshire, the countryside charity
- Eakring Parish Council
- Forestry Commission
- John Anthony Gray
- JPAG
- Laxton and Moorhouse Solar Concerns
- Marie-Louise Stewart on behalf of Andrew Stewart (Farmers Ltd), The Toward and Stewart Families, Beesthorpe Manor Farm
- Michael Pickering
- Nottinghamshire Area Ramblers
- Ossington Solar Concerns group
- Rt Hon Robert Jenrick MP
- Weston Parish Council

Written submissions of oral cases

- 4.1.2 Post-hearing submissions from Category 2 Stakeholders, including written summaries of oral cases and comments on Relevant Representations, to which the Applicant wishes to respond, are included in the tables in this Section.
- 4.1.3 The Applicant has responded to the following post hearing submissions:
- Councillor Bert Bingham
 - Jonathan Drew and Sally Drew

4.2 RESPONSES TO AVERHAM KELHAM AND STAYTHORPE PARISH COUNCIL'S WRITTEN RESPONSE

Table 4-1 Responses to Averham Kelham and Staythorpe Parish Council

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Averham Kelham and Staythorpe Parish Council [REP1-070]		
<i>General</i>		
Page 1	With regard to the existing Staythorpe Power Station and sub station sites, new BESS at Staythorpe, BESS at Averham and GNR proposals: <i>"...361.4 hectares out of 1,847 parish hectares almost 20% of our parish potentially turned into an industrial power generating landscape.</i> <i>We don't believe the cumulative effect has been truly recognised and the huge impact this will have on the parish. We do not accept the argument that these developments can be looked at individually and the cumulative impact is totally overwhelming the three rural villages as they are sited right round the residential areas of our parish".</i>	The Applicant has set out a response to issues raised relating to the approach to cumulative assessment at Table 4-5 General of the Responses to Relevant Representations [EN010162/APP/8.16A] [EN010162/APP/8.8] [REP1-065] on page 301. The cumulative environmental effects, including visual impacts are also detailed in Section 1.7 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Averham Kelham and Staythorpe Parish Council [REP1-070]		
<i>Land Use and Site Selection</i>		
Page 1	<i>"The loss of best and most versatile Grade 2 and 3a agricultural land to the tune of 272 hectares (this is land that is currently being farmed) will be lost to these developments for a least 40 years and again the cumulative effect on British farming threatens the UK food security and the increased carbon footprint caused by the increased imports".</i>	Please refer to the Applicant's response to NSDC's LIR 13.3-13.4 above for further details on this point.
<i>Landscape and Visual</i>		
Page 1	<i>"At present the proposed Kelham site is open farmland. The footpath from Broadgate Lane to Averham Park provides open natural space to see the woodland and open fields. The hamlet of Averham Park will be totally surrounded by solar panels which currently is open farmland with a number of high value footpaths. If this development is allowed, we will be exposed to narrow tracks with 3m high metal security fences on either side and no amount of planting and biodiversity will be able to compensate the loss of this natural open landscape"</i>	The Applicant acknowledges concerns in relation to the visual effects from the local footpaths at Averham Park. The likely visual effects on users of PRow in proximity of Averham Park has been assessed within Section 7.7.10.4 of ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A]. The assessment has identified major/moderate adverse effects during Construction, Operation, and Decommissioning. However, once proposed planting matures, the effect on visual receptors is predicted to reduce to moderate adverse effects. Paragraph 6.11.17 of the Planning Statement [EN010162/APP/5.4B] sets out that <i>"6.11.17 Whilst some limited significant adverse effects have been identified, these are considered to be limited for a development of this nature. NPS EN-1 clearly states that virtually all NSIPs will have</i>

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Averham Kelham and Staythorpe Parish Council [REP1-070]		
		<i>adverse impacts on the landscape. It is clear that the site selection and the landscape strategy have sought to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. The benefits of the Development clearly outweigh the landscape and visual effects which would result.</i> <i>6.11.18 Therefore, in consideration of the above, the Development is considered to be in accordance with NPS EN-1 and NPS EN-3."</i> Kelham solar farm is now consented and will be located to both sides of the footpath route from Broadgate Lane (Kelham) to Averham Park between Kelham and the BESS which forms part of the Proposed Development. The relationship of Kelham solar farm to the footpath, including the distances to fences, solar panels and/or mitigation planting provided as part of the Kelham solar farm development form part of that consent, and as such have been found to be acceptable. The Proposed Development would add the BESS and 400kV substation to the south of the footpath (beyond an existing hedge) as it turns northwest towards Averham Park. The design of the Proposed Development in this area includes further planting in the gap between the existing hedge and the fence around the BESS as shown on Sheets 2 and 3 of the ES Volume 4, Appendix A5.1.1: oLEMP Appendix [EN010162/APP/6.4.5.1.1A] [REP1-027]. Requirement 8 in Schedule 2 to the Draft DCO [EN010162/APP/3.1C] secures that no phase of the authorised development may commence until a written landscape and ecological management plan for that phase has been submitted to and approved by Newark and Sherwood District Council. This must be in

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Averham Kelham and Staythorpe Parish Council [REP1-070]		
		accordance with ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1B] and must be implemented as approved. The relationship of solar areas within the Proposed Development to the hamlet of Averham Park is illustrated by the Landscape Masterplan [EN010162/APP/2.11] [APP-031]. The design of the Proposed Development includes for a minimum of 10m between the centre of any PRoW and the nearest solar PV panels as set out in ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.8B], Table 18.1, and illustrated by Inset 18.8 in Section 18.6. Except around the substations and BESS, fences would be a maximum of 2.1 m tall wooden post and metal mesh 'deer fencing' as indicated in ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5A], Table 5.6, and illustrated by Figure 5.11 in ES Volume 3, Chapter 5 Development Description Figures (Part 3 of 3) [EN010162/APP/3.5B]. All of which are guided by the Concept Design Parameters and Principles [EN010162/APP/7.14B].
General		
Page 1	<i>"The unknown effects/consequences of the National Highways plan to dual the A46 between Farndon and the A1 has been granted. A flood elevation scheme is sited in the adjoining field to the Kelham Solar Appeal site on A617 between Kelham and Averham. This scheme is designed to flood land at times</i>	The A46 upgrade DCO has been considered within the Environmental Statement Chapters. Please refer to the Applicant's response to the cumulative effects in Table 4-5 General of Responses to Relevant Representations [EN010162/APP/8.16A] [REP1-065], on page 301.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Averham Kelham and Staythorpe Parish Council [REP1-070]		
	<i>of high river levels, compensating for the flood plain lost to the duelling of the A46. At the time of the Kelham Solar planning application and the GNR Solar Park this A46 duelling had not been approved. This plan to Duel the A46 now has full approval”.</i>	The visual effects of GNR with Kelham solar farm are then assessed Section 7.9 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A]. The Applicant considers that the approval of the A46 upgrade DCO and Kelham Solar appeal does not undermine the conclusions of the Environmental Statement.
Page 1 / 2	<i>“Another concern is the human and environmental impact and ethical manufacture of the components within the solar/BESS developments. Most are sourced from China and the mining of raw materials, and the manufacturing process of solar panels and batteries is estimated to be 40% produced by unethical working practice. No account has been taken in respect of the likely significant ecological and environmental effects of the development on the countries producing the elements used in the construction of solar and battery technology”.</i>	Please refer to Table 4- 5 General of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 296.

4.3 RESPONSES TO BUGLIFE- THE INVERTEBRATE CONSERVATION TRUST'S WRITTEN RESPONSE

Table 4-2 Responses to Buglife - the Invertebrate Conservation Trust

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Buglife- the Invertebrate Conservation Trust [REP1-085]		
<i>Ecology and Biodiversity</i>		
Page 1	With reference to relevant representations dated 2nd October 2025: <i>"Since submitting our relevant representation and reading the transcripts from Issue Specific Hearing 1 (on 27th November 2025) that discussed biodiversity and ecology we are not aware that any further consideration has been given to mitigating the impacts of polarised light on aquatic invertebrates and therefore our concerns on this issue remain unresolved".</i>	The Applicant has set out a response to issues raised relating to the effects of polarised light from the Development at Table 3-23 of Responses to Relevant Representations [EN010162/APP/8.16A], on page 172.
Page 1	<i>"Scientific research points to two main approaches to reducing the impact of polarised light from solar development; the addition of gridding patterns (Black TV & Robertson BA (2020)) and textured cover layers (Fritz et al, 2020). Though grid patterns are already part of most solar panel design, their function is associated with energy production and therefore there is no reason to believe they are</i>	Textured or patterned cover glass exists in a research and niche manufacturing context, but it is not standard for large-scale solar due to supply chain limitations, certification requirements, durability concerns and uncertain performance gains. The industry approach to managing reflection is anti-reflective coatings and glass treatments to reduce overall glare, which are already standard. These measures do not specifically target polarised light, but there is currently no proven, commercially deployable panel solution that does so at scale.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Buglife- the Invertebrate Conservation Trust [REP1-085]		
	<i>effective in reducing polarised light impacts. Gridding patterns could be implemented at minimal cost to energy production or with the case of specific textured cover layers, could serve to increase photovoltaic efficiency.</i> <i>Buglife would like to strongly recommend that to avoid adverse impacts to aquatic invertebrates, appropriate solar panel mitigation should and must be implemented if the scheme was to gain consent. For no mitigation to be offered at all, given the site's location, is extremely worrying and counter-productive to the measures put forward to enhance biodiversity".</i>	As stated at Table 3-23 of Responses to Relevant Representations [EN010162/APP/8.16A], on page 172, the Development includes a range of embedded mitigation, notably the widespread cessation of agriculture and avoiding development around the key wetland habitats including the main watercourses and the south-eastern areas of the Order Limits closest to the River Trent. As stated at Table 4-2 Ecology and Biodiversity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 376, the Applicant is committed to delivering biodiversity enhancements across the site ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B].

4.4 RESPONSES TO CARLTON-ON-TRENT PARISH COUNCIL'S WRITTEN RESPONSE

Table 4-3 Responses to Carlton-on-Trent Parish Council

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
<i>Flood Risk, Drainage and Water</i>		
Page 1 of REP1-071	<i>"Carlton-on-Trent has long been vulnerable to flooding, but recent events—particularly Storms Babet and Henk—have highlighted a shift from fluvial flooding caused by the River Trent to pluvial flooding arising from sudden, intense rainfall...</i> <i>...The topography of the surrounding area exacerbates flooding. Water runs off the nearby hills into the Trent valley, and when the river and tributaries are already at capacity, overflow spreads across former flood meadows and low-lying plains. This contributes to flooding not only in the village but also along the A1 and potentially the East Coast Main Line.</i> <i>Carltonon-Trent is further burdened by receiving pumped water from nine upstream villages, including Sutton-on-Trent...When heavy rainfall overloads the main pump at Cromwell, water backs up with</i>	The Applicant has set out a response to issues raised relating to flood risk in Carlton-on-Trent at Table 3-3 (Responses to Carlton-on-Trent Parish Council) of the Responses to Relevant Representations [EN010162/APP/8.16A]. A summary of the Applicant's position set out at paragraph 1.7.11 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].

¹ The Interested Party submitted both a summary of written representations and the full written representation. The Applicant has had regard to both documents and has summarised the points raised across both submissions.

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	<i>nowhere else to go. Because soil in the region is heavy clay, water movement accelerates when the surface becomes compacted, worsening the rate at which runoff enters the village's streams and drainage network".</i>	
Page 1 of REP1- 071	<i>"The assumption that rainfall will infiltrate beneath the panels is challenged: panels create rain shadows that reduce the area available for absorption, concentrating runoff into rivulets that carve channels down slopes. These rivulets form because water tends to fall from the lowest panel corner, creating persistent driplines that compact the soil further. This issue is magnified on clay soils, such as those at Carlton-on-Trent, where compaction significantly increases runoff.</i> <i>"Evidence from similar solar proposals supports these concerns. A planning inspector in a comparable appeal case for a solar farm at Glebe Farm, Taunton (Appeal ref: APP/d3315/A/13/2203242) concluded that water would run off panels in concentrated flows, increasing runoff rather than promoting infiltration. The Carlton-on-Trent scheme risks receiving runoff not just from the proposed site but also cumulatively from other nearby solar farms at Eakring, Maplebeck, Caunton, and Norwell.</i>	The appeal quoted in REP1-071 relates to a solar development to be on steeply sloping land, all above 12% slope, and proposed drainage mitigation outside of the planning boundary, for which the Environment Agency objected to questioning the ability of the applicant to deliver said measures to prevent offsite flooding. As outlined in Section A9.1.3.2.1 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039], 80 % of Work Area 1: Solar PV for the Development is on slopes of less than 6 %. Work Area 1: Solar PV is mostly shallow sloping with steeper slopes confined to the banks of drainage ditches and isolated areas, as shown in Figure A9.25 in Appendix D. As such, no formal attenuation is required for the solar panels at the Development as the raised nature of PV arrays will not prevent soil from absorbing rainwater - as the panels will not be placed directly on the ground and each PV Row will be separated, with the same area of soil / grassland available for infiltration as per the baseline scenario. The PV array tables will have regular rainwater gaps to prevent water being concentrated along a single drip line. As such, rainfall landing on the solar panels will drain through rainwater gaps

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
		and infiltrate into the ground beneath and between each row of panels. As outlined in Section A9.1.3.2.1 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039], in areas where PV arrays run parallel to a slope of 6 % or greater, active measures such as berms, stone filter drains and swales will be incorporated to slow the flow of surface water run-off as part of construction SuDS, which could be retained for the operational phase of the Development. Filter drains would measure 200 mm width and 300 mm depth in the form of a linear scrape which is backfilled with clean, uncompacted Type 2 or 3 aggregate. The use of grassland and wider vegetation planting within and around the PV arrays provides a significant betterment than the existing agricultural scenario and as a result will not increase surface runoff. Models of the existing pluvial flow pathways around the catchment of Carlton-on-Trent are being brought forward via the NG+ fund, which seeks to provide opportunities for flood alleviation in communities with existing flooding issues via natural Flood Management techniques.
Page 1 of REP1-071	<i>"Fields identified for the solar arrays slope toward Ossington Road and down into the village"</i> (the full WR [REP1-072] notes the relevant fields are DB043 DB042 DB041 DB044 DB045 DB046.	Figure 9.4 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052] shows watercourses within the Core Study Area and was informed by national datasets as well as information provided by the Internal Drainage Board, whose assets

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	<i>“Several streams that run through or near the village are already prone to overtopping during winter, and residents note that these watercourses were overwhelmed during Storm Babet. Sections of these streams are missing from the applicant’s maps, and consultations with railway authorities—relevant because watercourses pass under the East Coast Main Line— appear absent. Other fields in the proposed area, known locally as Low Moor, frequently hold winter standing water. During major storms, flooding here has reached the A1, causing significant national disruption”. The full WR [REP1-072] notes the relevant fields include DB050, DB047, DB049 and DB048</i>	are shown on Figure 9.6. These figures show an accurate representation of watercourses in proximity to Ossington Road, including those which pass under the East Coast Railway line. Anecdotal evidence suggests that “Low Moor fields” have previously flooded during named storms, in particular Storm Babet (2023). Figure A9.7 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039] presents the flood depths from 2D rainfall modelling undertaken for the Development. The pluvial flood extents are confined to Field E182/184 of the Order limits (identified as Field DB049 in REP1-072) with depths within Work Area 1: Solar PV restricted to 0.47 m for the 1 % AEP event and 0.56 m for the 1 % AEP event + 25% climate change scenario. This is a more conservative estimate of pluvial flood depth than the Environment Agency Risk of Flooding Surface Water dataset (shown in Table A9.1.5: Work Area 1 over 0.3 m pluvial depth of the FRA). PV arrays will have a leading edge (bottom edge of panels) raised off ground level by approximately 0.5 m, with the exception of areas modelled to flood to a depth of 0.5 m or higher for the 1 % AEP + 25 % CC event (in accordance with Lower Trent and Erewash Management Catchment peak rainfall allowances (2070s)), whereby the leading edge will be higher, to allow for 300 mm freeboard to account for residual uncertainty in the modelling.

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
		Pluvial flood depths have been verified by 2D direct rainfall modelling, as shown on Figure A9.7 in Appendix D: 1 % AEP Flood Depths – Raincloud 2D Modelling of the FRA. As such, the impact of pluvial flooding on Work Area 1, Solar PV, will impact the ability of the Development to function and the thin nature of the racking systems supporting the PV arrays. Development will not displace pluvial floodwaters offsite.
Page 2 of REP1-071	<i>Despite assurances that flood zones were carefully considered, residents note inconsistencies: land known to flood was included, while other flood-prone areas were selectively removed when revised national flood maps were issued. Residents contend that Elements Green ignored local knowledge and that the revised flood zone classifications do not accurately reflect the true behaviour of the land.</i>	The Applicant has set out a response to the Relevant Representation regarding this issue at Table 4-4 of the Responses to Relevant Representations [EN010162/APP/8.8] [REP1-065], on page 287. This confirmed that Solar PV was removed from the eastern section of the site following the PEIR stage assessments. The Order Limits are mostly located in Flood Zone 1 (having less than a 1 in 1000 (0.1%) annual probability of flooding). No works for solar PV will be within Flood Zones 2 and 3. The only works proposed within Flood Zones 2 and 3 are Work Areas 2: Cables, Work Area 3: Mitigation/enhancement, Work Area 6: Consented Staythorpe BESS and Work Area 7: National Grid Staythorpe Substation.
Page 8 of REP1-072	During the meetings of 26th November (recording ISH pt 1 29mins 27 secs) and 27th November (recoding ISH pt 2) we were informed by the applicant, that flood land was not included; that fields had been carefully selected. This is not the case.	Please refer to the responses above which address these matters

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	Throughout consultation Elements Green were informed the Low Moor fields were often saturated to capacity or under water during winter; hence why that stretch of road floods so readily. Following consultation one areas to the south of us at Cromwell were removed. We were informed on 27th November by the applicant that the zonal flood maps for the UK had been revised earlier this year and so they had altered their scheme. It is important to note that the flooding to those fields had taken place before the zonal maps were revised, Elements Green had not heeded the information they were given. Likewise Low Moor also floods, despite being on the same contour lines and the same side of the railway line with no clear barriers between them, this area has been put into flood zone 2 and so the applicant has failed/decided not to heed the information they have been given.	
<i>Land Use and Site Selection</i>		
Page 1 of REP1- 071	<i>Construction of the solar farm would require heavy machinery that compacts clay soils, reducing fertility and inhibiting water absorption. Although grazing sheep is proposed beneath panels, livestock also compact soil, historically used for this purpose when</i>	The Applicant has set out a response to the Relevant Representation regarding this issue at Table 3-3 of the Responses to Relevant Representations [EN010162/APP/8.8] [REP1-065] , on page 287.

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	<i>creating ponds. Because clay land in this region must often be “moled” or ploughed to maintain drainage, a long-term installation risks sustained degradation of soil structure.</i>	
Page 2 of REP1- 071	<i>“Beyond flooding, residents emphasise the loss of Best and Most Versatile (BMV) agricultural land. All the fields proposed for development have long produced high-yield cereal crops, often exceeding 3.5 tonnes of wheat per acre—values consistent with Grade 2 or Grade 3a soils, which the government has pledged to protect from solar development.</i> <i>They argue that soil quality appears not to have been properly assessed and that land selection was opportunistic, relying on unsolicited offers to landowners rather than strategic planning. Concerns also extend to long-term soil health; excluding land from natural cycles of weathering, growth, and decomposition for forty years may permanently diminish fertility”.</i>	The Applicant has set out a response to the Relevant Representation regarding the loss of BMV at Table 3-3 Responses to Carlton on Trent Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 22
Page 11 of REP1- 072	The full WR suggests that these fields were clearly not part of the scrutiny checks that we were told on 27th November took place regarding field selection.... <i>We already know field selection was not stringent, because fields at Cromwell initially in the</i>	Section 4.3 of ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] sets out a range of factors that influenced site selection. The removal of land at Cromwell was therefore considered as part of a wider balance of planning, environmental, and technical considerations.

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
	Carlton-on-Trent Parish Council [REP1-071] [REP1-072]	
	<i>scheme, have since been removed, furthermore DB048 & DB049 - Low Moor floods, flood. Flood water brings with it silt, old riverbeds are examples of good soils because of these silts. The land at Cromwell, now removed from the scheme is clearly Grade 2 on the maps for BMV, these were removed due to flooding factors which questions was land quality ever properly considered. It is fair to say the report delivered at the hearing meetings was confusing, Mr Kernan recognised there were errors in his calculations (we are grateful for this acknowledgement, and appreciate we are all fallible) however Mr Kernan acknowledged the project was using BMV land and justified this because it was only 2000 hectares – though this figure is wrong, but solar projects are not supposed to use any BMV land. We challenge the assumption that the fields at Carlton are of poor grade 3, an assumption based on the land to the northeast of the Trent, separated by the river, the village, the A1 and the railway, is grade 4. However, the grade 2 fields at Cromwell, along the same corridor of contours with no obstruction, are just 549 meters away. Additionally continuing in a northward direction land is also grade 2.”</i>	The design evolution of the Development has been discussed and is summarised in Section 1.4 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. In particular, paragraph 1.4.74 explains the approach taken to the use of BMV land. Revised cumulative BMV figures are provided in Appendix 4 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], on page 71. In response to Action Point 19 from the hearing, the Applicant confirms that the updated collective total of BMV land is 3,222 hectares. This revision does not change the overall conclusions of the assessment.

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
<i>Land Acquisition</i>		
Page 11 of REP1-072	<i>"The acquisition of land was random, no request for specific fields to adjoin others in a scheme, everything was done in isolation; there was no transparency, nothing to indicate any individual acquisition would become part of a much larger scheme"</i>	The Applicant's land acquisition strategy has been undertaken in accordance with standard practice. All reasonable steps have been taken to identify parties with legal land interests or potential compensation claims, using a robust methodology that included interrogating public records, proactive engagement, and on-site verification to ensure the collection of comprehensive and accurate data. The Land and Rights Negotiations Tracker [EN010162/APP/4.4B] ("LRT") confirms that agreements have been concluded with a considerable number (indeed the majority) of the owners of land and interests required for the proposed Development. There are a limited number of instances where negotiations between the Applicant and an affected party are ongoing. However, in every case, it is anticipated that agreement will be reached during the course of the Examination. Having regard to the LRT, it is evident that the Applicant has made significant progress in assembling the land required to deliver the proposed Development and that its adopted land acquisition strategy is clearly not random – rather, it has and continues to be very successful, effective and efficiently executed. The Parish Council appends copies of documents which it considers supports its assertions about the Applicant's land acquisition process. These are Land Interest Questionnaires ("LIQs") which are a necessary part of the Applicant's diligent enquiry process to identify

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
	Carlton-on-Trent Parish Council [REP1-071] [REP1-072]	persons with an interest in land that may be affected by the proposed Development. Appendix 2 to the Statement of Reasons [EN010162/APP/4.1] [APP-010] contains details of the Applicant's Land Referencing Methodology [EN010162/APP/4.1.2] [APP-012]. As stated in paragraph 2.1 of this document, the Applicant has adopted a cautious but proportionate approach to identifying the extent of land to be referenced and, with legal and project/design team oversight, has applied a robust methodology in order to identify relevant interests. The Applicant's methodology included the issue of LIQs, sent to the owners of land and interests within the Order limits, in order to supplement and verify information obtained through the desktop research undertaken by the Applicant's appointed land referencing agents. The LIQs request provision by the recipients of details of their respective interests, any associated third party interests and the spatial extent of such interests. It is common for LIQs to relate to land extending beyond the Order limits subject of a subsequent DCO application in order to ensure that the totality of the interests which may be affected are captured and that the full extent of the impacts of the project being promoted are understood. As is standard practice, prior to undertaking statutory consultation in respect of the proposed Development, the Applicant carried out a review of the 'PEIR' boundary to establish Land Referencing Limits ("LRL") – informed by the project/design team's experience of similar

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
		schemes and with a view to ensuring that all land interests that would fall within the Order limits or otherwise be included in the Book of Reference [EN010162/APP/4.3C] would be captured. The LRL included areas of potential change and buffers to allow for the subsequent refinement of the design of the Project. The Applicant maintains that it has undertaken a diligent land referencing exercise in respect of the application for the proposed Development.
<i>Ecology and Biodiversity</i>		
Page 2 of REP1-071	<i>“Environmental impacts on wildlife raise further alarm. Studies commissioned by the developer are viewed as inaccurate, notably by failing to record known barn owls, tawny owls, red kites, and buzzards in the area. The parish fears profound habitat fragmentation, particularly if the developer uses large enclosed fenced areas that sever wildlife corridors— contrary to national and local nature recovery strategies. These corridors are vital for the movement of animals, dispersal of seeds, genetic exchange, and ecological resilience. Without them, populations risk isolation, reduced genetic diversity, and potential local extinctions”.</i>	The Applicant has set out a response to the Relevant Representation regarding biodiversity in Table 3-3 (Responses to Carlton-on-Trent Parish Council) of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 23. A range of baseline studies, following good practice methods, has been undertaken to establish the status and distribution notable and protected species and habitats in the parish and all other parts of the Order Limits and these are presented in ES Volume 4, Appendix A8.1–12 [EN010162/APP/6.4.8.1–12]. Potential effects, including on wildlife movements, are assessed in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A]. The survey methods in ES Volume 4, Appendix 8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4] [APP-217] follow good

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
		practice and are standardised and repeatable methods to determine the breeding status and location of birds. The locally observed activity of birds does not necessarily reflect the breeding status of the species.
Page 16 of REP1- 072	<i>Unless a thorough in-person survey is undertaken multiple times daily over an extended period exceeding the current timeframe, the developer may not acquire an accurate understanding of the habitats likely to be affected. Such limitations could lead to misconceptions among the public and decision-makers regarding the true extent of ecological impact, potentially resulting in an underestimation of the environmental consequences. We would like it noted that Carlton Wood is classed as an Ancient Woodland, and as such deserves special protection. We do not believe that siting a substantial sized substation next to this wood is advantageous to the wildlife (and certainly would not be expected from a Biodiversity park!). We believe there are several other sites that would serve equally as well.</i> <i>Encasing fields in tall deer fencing prevents the movement of any mammal larger than a rabbit. The Applicant at one meeting in Cauntton advocated that to prevent impact and reduce the amount of fencing they were going to fence larger areas where possible.</i>	Please see above in relation to baseline studies and surveys. The Applicant has also provided a response relating Carlton Wood LWS in Table 3-3 (Responses to Carlton-on-Trent Parish Council) of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 23 . The Applicant also notes that the approach to Ecology and Biodiversity, including survey methods, is under discussion with NCC, NSDC, NE and EA and the discussions are set out within the respective Statement of Common Grounds: • Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1] • Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2] • Statement of Common Ground with Environment Agency [EN010162/APP/8.3] • Statement of Common Ground with Natural England [EN010162/APP/8.4]

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	<i>Carlton-on-Trent Parish Council is wholehearted AGAINST this suggestion. This will seriously impact on the natural corridors across the land, the pipeline effect, vital for wildlife movement. This policy flouts the very principles of the Local Nature Recovery Strategy, a strategy that Government has asked every authority to create (Local Nature Recovery Strategy for Nottinghamshire and Nottingham Nottinghamshire County Council).</i>	
Cumulative and Visual Effects		
Page 2 of REP1- 071	“The solar project’s scale is seen as overwhelming. Carlton-on-Trent would be surrounded by solar arrays on three sides, with the river forming the fourth. Residents, already enclosed by existing turbines to the west, argue that their countryside would effectively be industrialised”.	The Applicant has set out a response to the the Relevant Representation regarding landscape and visual effects within Table 3-3 (Responses to Carlton-on-Trent Parish Council) of the Responses to Relevant Representations [EN010162/APP/8.16A] , from page 24 to 27.
Page 19 of REP1- 072	<i>“There are so many schemes that need to be taken into consideration and yet the Applicant informed us at the Hearing meeting that they had taken a “story telling approach” (recording 34:45). They decided there were to many countryside routes the public could use, so took the option of investigating the</i>	The Applicant notes these comment and the comment below on page 186. The reference to ‘story-telling approach’ appears to be a misunderstanding of what was said on behalf of the Applicant during ISH1. The Applicant was explaining that a narrative approach to describing sequential visual impacts on individual routes was typically only undertaken (where relevant) for primary routes and that

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	<i>impact on none. They could have selected a few, however, it is our belief that each scenario would have shown the sequential visualisation to be significant, hence their decision. We whole heartedly endorse all the points made by NSDC Visualisation Specialist at the Hearing Meeting, the Applicant has not made adequate assessment to accumulative visualisations, they have taken a "light-touch" approach.</i> <i>The Government advocate that each household should be within 500 meters (15 minutes) walking distance of a greenspace for recreation and wellbeing, recognising the importance of connecting with nature for physical and mental health. Access to green space in England - GOV.UK The GNR Solar project is counterproductive to this ethos, aiming for a green space to be confronted by the strobe effect of walking through an industrialised landscape. Panel arrays are scattered across dozens of zones (e.g., N1 to N12.4 in the north, E1 to E11 in the east, S1 to S8 in the south, and W1 to W20 in the west), integrated into diverse grasslands and arable fields with inverters, gravel tracks, tall deer fencing threading through the landscape".</i>	sequential views on other journeys were covered by the assessment of visual effects for visual receptor groups in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] and illustrated by ES Volume 3, Figure 7.6 Visual Receptors Before Mitigation [EN010162/APP/6.3.7.6] [APP-103] and ES Volume 3, Figure 7.7: Visual Receptors After Mitigation [EN010162/APP/6.3.7A] [AS-035] For clarity, additional figures have been provided which focus solely on the visual receptor groups and which are shaded to show the level of effect assessed for each of the groups. Please refer to Appendix A of the Responses to ExA's First Written Questions [EN010162/APP/8.22].

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
Page 19 of REP1- 072	<i>In Chapter 5 – Development Description (submitted 22 July 2025), Section 5.4.3.5 details the perimeter fencing for the solar park (the main development area) as a Deer Fence (timber and wire). This is designed to secure the site while incorporating wildlife provisions.</i> <i>The full WR further notes that In order to minimise visual impact, we strongly recommend a double row deer fencing is mandated as a condition given that it has clear advantages over the single fence type. Deer can jump height, but will not when a double bounce is required, hence lower, less intrusive fencing is equally secure a stock proofing method against the deer.</i>	The deer fences are set out in ES Volume 3, Figure 5.11: Illustrative Fence and Gate Elevations [EN010162/APP/6.3.5B] as being a maximum of 2.1m high, with the illustrative design being for these to be 1.8m high. A lower height is unlikely to be effective, and doubling the required length of fence overall (Chapter 5 sets a maximum length of 140 km) would result in a greater environmental footprint and cost. The fences are to be located within the fields, and the fields will be surrounded by hedges. Except for a relatively short period immediately following the construction phase, when new hedges are still establishing, fences will not generally be visible as a result of the hedges. Having a double fence is therefore not considered to be the best practicable environmental option.
Landscape and Visual		
Page 18 of REP1- 072	<i>Carlton-on-Trent will be surrounded by panels to the north, south and west; to the east we have the Trent, we will not be able to travel out of the village without going through panels, and to the west there are also turbines. The industrialisation of our immediate countryside is considerable, alas once through the proposed GNR development, we would still get no respite as other solar farms already exist, some are</i>	Figure A2.11.a of ES Volume 4, Technical Appendix A2.1 - Cumulative Assessment Stages 1 and 2 - Rev 2 [EN010162/APP/6.4.2.1A] [REP1-024] shows the relationship of the Proposed Development and shortlisted cumulative developments to Carlton-on-Trent. The Proposed Development would be to the west of the village and would be the only solar farm within approximately 3km of the village. Only the road west from Carlton-on-Trent towards Ossington, Kneesall and the A616, and 0.5km of the road

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	<i>being built, others approved and others in the planning process</i>	southwest towards Norwell would pass through the Proposed Development. A further 0.7km of the road to Norwell would pass alongside the Proposed Development. Journeys out of the village to the south or north via the primary routes of the A1 or B1164 would not pass through the Proposed Development. As shown by ES Volume 3, Figure 7.6 Visual Receptors Before Mitigation [EN010162/APP/6.3.7.6] [APP-103] and ES Volume 3, Figure 7.7 Visual Receptors After Mitigation [EN010162/APP/6.3.7.7] [APP-104], effects on these routes arising from the Proposed Development would be limited to short stretches of visibility affecting the routes north of Carlton-on-Trent, with the greatest effects arising on users of the A1, around 3.5-5km to the north of the village, where users of the B1164 and A1 would pass close to the Proposed Development along with Eganton and Tuxford Road solar farms. For users of the A1, this short stretch of route would be passed through at speed. Neither the Proposed Development or shortlisted cumulative projects are close to these routes to the south of Carlton-on-Trent, and the Proposed Development would have negligible impacts on these routes south of Carlton-on-Trent.
Page 19 of REP1-072	There are so many schemes that need to be taken into consideration and yet the Applicant informed us at the Hearing meeting that they had taken a 'story telling approach' They decided there were to many countryside routes the public could use, so took the	Please refer to the Applicant's responses above at page 182 to page 183.

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	option of investigating the impact on none. They could have selected a few, however, it is our belief that each scenario would have shown the sequential visualisation to be significant, hence their decision.	
	<i>"Cumulative visual impacts have not been fully assessed"</i> (stated in the summary rather than the full document provided by Carlton-on-Trent Parish Council).	The assessment of cumulative landscape and visual impacts in section 7.9 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] is brief, but it is nonetheless complete. GLVIA3 encourages proportionate reporting, as noted at paragraph 101 of the LVIA, and GLVIA3 also cautions (at paragraph 7.5) that in relation to cumulative assessment <i>"The challenge is to keep the task reasonable and in proportion to the nature of the project under consideration. ... It is always important to remember that the emphasis in EIA is on likely significant effects rather than on comprehensive cataloguing of every conceivable effect that might occur."</i>
Landscape and Visual - Glint and Glare		
Page 2 of REP1- 071	<i>"Concerns extend to glint and glare from panels, with potential hazards for road users, especially on the A1 and B1164, for boaters on the River Trent, and for train drivers on the East Coast Main Line—whose new, higher-cab electric trains will increase visibility of panels. Migratory birds, particularly geese following the Trent valley, may mistake the panels for water,</i>	The impact of glint and glare on the road users, PRow users and wildlife has been assessed and the assessment is provided in ES Volume 4, Appendix A16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286] . Effects were found to be comfortably below the assessment criteria derived from best practice UK and international guidance at all residential dwellings, and therefore acceptable.

WR Ref.	Summary Position of Interested Party ¹	Applicant's Responses
Carlton-on-Trent Parish Council [REP1-071] [REP1-072]		
	<i>risking fatal collisions. Aviation safety concerns arise due to the use of local airspace by military and civilian aircraft.</i> <i>Residents also highlight risks to human health from glare exposure, anxiety over unknown future mitigation, and the general psychological toll of living within an industrial landscape. Further loss of historic landscape features, disruption of footpaths and bridleways, increased traffic, and the destruction of rural tranquillity contribute to the community's opposition.</i>	

4.5 RESPONSES TO COUNCILLOR JAMES GAMBLE'S WRITTEN RESPONSE

Table 4- Responses to Councillor James Gamble

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor James Gamble [REP1-109]		
<i>Land Use</i>		
Section s3.1 / 4.1 / 4.2	Summary of comments in relation to BMV: <i>"During Issue Specific Hearing 1 (27 November 2025), Elements Green acknowledged numerical errors in ES Table 17.21, including the omission of 211 ha of BMV land at Beacon Fen.</i> <i>"The One Earth NSIP was not included in the cumulative BMV assessment.</i> <i>"Correcting these errors increases the cumulative BMV total from 2,350 ha to 3,222 ha, an increase of 872 ha, or 37%, which materially affects the assessment of cumulative effects</i> <i>"...the corrected cumulative BMV total (3,222 ha) represents a significant adverse cumulative effect, particularly in Newark & Sherwood District".</i> <i>"The Applicant maintains that cumulative effects remain "not significant."</i>	Revised cumulative BMV figures are provided in Appendix 4 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], on page 71. In response to Action Point 19 from the hearing, the Applicant confirms that the updated collective total of BMV land is 3,222 hectares. This revision does not change the overall conclusions of the assessment. A revised ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] has been submitted at Deadline 2 to reflect the changes to Table 17.21.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor James Gamble [REP1-109]		
	ES Table 17.21 should be corrected and the cumulative significance assessment revised to reflect the correlated BMV baseline of 3,222ha.	
Sections 3.2/ 3.3 / 4.3	With regard to local agricultural impacts: <i>The Newark Sugar Factory relies on a 25 – 30 mile radius of high-quality arable land for sugar beet supply.</i> <i>Loss of BMV land within this radius could:</i> - <i>Reduce the area available for beet cultivation</i> - <i>Displace cropping and disrupt rotation schedules</i> - <i>Increase transport distances and costs for farmers</i> - <i>Reduce operational efficiency at the factory</i>	The concern on the potential local agricultural impacts of the Development, particularly in relation to the Newark Sugar Factory, is noted. ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] identifies that three farm businesses occupy land within the Order Limits, all of which operate within arable land with some area used for sugar beet. The total area of land associated with these farm businesses within the Order Limits is approximately 250 ha. Of this total, only up to a maximum of approximately 50 ha comprises arable land on which sugar beet may be periodically grown as part of a rotational system. On this basis, the effect on sugar beet production at a local level has been assessed as minimal. This position is also summarised in the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], page 50. With regard to displacement of cropping and crop rotations, the Development is temporary in nature which retains the ability to reinstate arable agriculture after decommissioning. Whilst land use, in

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor James Gamble [REP1-109]		
	With regard to cropping and land use implications: <i>“The affected BMV soils typically support high-yield arable crops such as wheat, barley, sugar beet, and oilseed rape.</i> <i>Displacement of cropping due to solar park development could affect soil fertility, productivity, and long-term farm viability.</i> <i>The cumulative loss of 872 ha (37%) of BMV land within the district is a significant proportion of local high-quality farmland”.</i> The response requests that the Applicant should submit a local agricultural impact assessment including • <i>Impacts on the Newark Sugar Factory supply area</i> • <i>Displacement of cropping and implications for rotation schedule</i> • <i>Transport and logistics considerations</i> • <i>Local economic effects of BMV land loss</i>	terms of ability to undertake arable farming would be affected, the land's underlying soil quality would not become poorer as a resource. The proposed development would not result in the permanent loss of BMV land. Solar development is time-limited and reversible, with soils capable of being returned to agricultural production following decommissioning. As such, the Development do not represent a long-term reduction in arable land available for sugar beet cultivation. On a national and regional basis, National policy seeks to minimise the impact on BMV agricultural land, and requires that any use of BMV agricultural land be justified. Section 6.8 of the Planning Statement [EN010162/APP/5.4B] demonstrates that the Development has met the policy test. National and local planning policy do not require a local agricultural impact assessment, therefore, a local agricultural impact assessment is not necessary. In relation to transport and logistics, there is no evidence to demonstrate that the Development would lead to a material increase in transport distances or costs for farmers supplying the Newark Sugar Factory. The local economic effects of the Development have also been considered. Please refer to the responses below.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor James Gamble [REP1-109]		
Section 3.4	With regard to economic and community impacts: <i>Loss of BMV land could reduce farm income, which in turn affects local spending, employment, and supply chains.</i> <i>The sugar industry contributes to direct employment on farms and at the factory, as well as indirect jobs in logistics, processing, and storage.</i> <i>Displacement and loss of BMV land could therefore have wider socio-economic impacts in rural communities</i>	ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] identifies that the change of use from arable agricultural to the stationing of solar panels will have the effect of reducing the arable agricultural output of the Development. This includes jobs lost due to agricultural employment uses of the land, which are the only employment uses expected to cease over the period of construction, operation and decommissioning of the Development (noting the cessation of agricultural production is reversible in the long-term). The operation of the Development will have some effects on agricultural output. However, these effects are assessed as being minor adverse (not significant) on the basis that there will be significant beneficial effects upon economic output (all phases) and employment (construction). The residual impacts of the Project are not considered to be unacceptable when considered against the relevant policy.
Section 3.5	With regard to logistics and supply chain considerations: <i>“Increased displacement of sugar beet production would result in:</i> <i>Longer transport distances to the Newark factory</i> <i>Higher fuel costs and associated carbon emissions</i>	Please refer to the Response to Action Point 20 set out in the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor James Gamble [REP1-109]		
	Greater risk of spoilage or delivery delays, given the time-sensitive nature of beet harvesting <i>These factors demonstrate that the local significance of BMV land loss extends beyond on-farm effects to the regional processing economy"</i>	
Section 3.6	<i>The omission of One Earth NSIP and numerical errors at Beacon Fen undermine confidence in the cumulative assessment methodology.</i> <i>While the Applicant maintains the methodology is acceptable once corrected, the ExA should require a fully verified cumulative assessment to ensure conclusions are robust.</i>	The Applicant has corrected these errors at Deadline 1. A revised table is provided in Appendix 4 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. The updated collective total is 3,222 ha in total. This does not change the overall conclusion of the assessment. These updates are also now presented in the Deadline 2 version of ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A].
Section 4.4	The response requests that the Applicant should submit a: <i>"QA and verification processes, explaining:</i> <i>- How the errors occurred</i> <i>- What verification steps were undertaken</i> <i>- Measures to prevent future inaccuracies"</i>	The Environmental Statement has been prepared in line with Regulation 14(4) of the EIA Regulations, the ES and all technical assessments have been undertaken by suitably qualified 'competent experts' within the project team. Details of their relevant expertise are set out in Table 1.2 of ES Volume 2, Chapter 1: Introduction [EN010162/APP/6.2.1] [APP-044]. The error highlighted by the Applicant at ISH1 has been corrected and confirmed as having no effect to the assessment.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor James Gamble [REP1-109]		The Applicant has undertaken a comprehensive review of the DCO application and is not aware of any further issues.

4.6 RESPONSES TO CPRE NOTTINGHAMSHIRE, THE COUNTRYSIDE CHARITY'S WRITTEN RESPONSE

Table 4-4 Responses to CPRE Nottinghamshire, the countryside charity

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
<i>Landscape and Visual</i>		
Section 1	<i>"The proposed development would industrialise massive swathes of open countryside, out of scale and context with the rural area" making reference to CPRE's Getting Solar off the Ground, 2025 report.</i> <i>"The circular design of this project would surround and overwhelm rural settlements, industrialising their setting and fundamentally altering the visual identity of the Trent Valley".</i>	The CPRE tranquillity mapping (also referred to in the CPRE representation under the heading of amenity) was based on detailed modelling, the methodology for which is provided in 'Tranquillity Mapping: Developing a Robust Methodology for Planning Support Technical Report on Research in England, January 2008 (revised)'. The modelling divides the study area into squares and derives a tranquillity 'score' for each square by applying a weighting to a number of positive and negative factors and adding those factors together. Those weightings are detailed on page 63 of the Technical Report as presented within Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], as presented within Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068] as presented within Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], . Those weightings are detailed on page 63 of the Technical Report as presented within Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], as presented within

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
		Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], as presented within Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. Solar farms are not listed, but factors relating to seeing most forms of development (towns, power lines and roads) sit as a group among the negative factors with an average of 2.3% weighting, whereas seeing wind turbines is lower at 1.1%. It seems reasonable to assume that seeing a solar farm would sit among this group at around 2% negative weight, representing a very minor reduction in tranquillity. As set out at 7.10.6 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A], the Proposed Development would use limited lighting and would not give rise to significant visual effects at night.
	<i>“Designated landscapes are protected from such schemes, but undesignated landscapes of high local value deserve safeguarding for current and future generations. The visual dominance of this scheme would destroy tranquillity, dark skies and the sense of openness that defines the area.</i> <i>The proposal for an additional 64,500 trees and 50km of hedgerow would normally be supportable in appropriate locations but the</i>	The Applicant has set out a response to the Relevant Representation regarding construction traffic within Table 3-6 Responses to CPRE Nottinghamshire, the countryside charity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 40. Whilst some significant adverse effects on landscape and visual have been identified, there would no conflict with NPS EN-1 and EN3. NPS EN-1 recognises that virtually all NSIPs will have significant adverse impacts on the landscape. It is clear that the landscape strategy has sought to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. Moreover, this would be a

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
	<i>scale of this development cannot be visually mitigated".</i>	temporary period and that after planting proposals have matured, there would be limited cumulative landscape and visual harm. NPS-EN3 recognises the role of good design in minimising the landscape and visual impact. it is clear that the applicant has adopted good design principles from an early stage, mitigating the landscape and visual effect of the development as far as possible, through an iterative and considered design processes. With consideration of the above, the Development is considered to be in accordance with NPS EN-1 and NPS EN-3.
<i>Cumulative Impact</i>		
Section 2	<i>"The sprawling nature of the proposed installation would surround some rural settlements and overwhelm others. The nature of the design, comprising multifarious parcels of land, is in itself a cumulative impact issue..."</i> <i>"Equally this proposal cannot be considered in isolation" with reference to other projects..."this concentration of industrial-scale energy infrastructure risks overwhelming the district's capacity to manage environmental change, creating irreversible impacts on landscape, biodiversity, and amenity"</i>	The Applicant has set out a response to the Relevant Representation regarding construction traffic within Table 3-6 Responses to CPRE Nottinghamshire, the countryside charity of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 41.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
<i>Land Use</i>		
Section 3	In relation to food security: <i>“The application documents suggest that over 60% of the land impacted by this proposal is Best and Most Versatile agricultural land. CPRE Nottinghamshire believes that impact on food security carries equal priority to fuel security. CPRE has consistently warned against the loss of productive farmland to solar development. Our Building on our Food Security, 2022 research reveals that 60% of England’s best farmland is already at risk of flooding due to climate change. To cover such land with solar panels and battery for forty years is reckless when rooftop alternatives exist now and technology improvements will render current renewable installations obsolete within this period.</i> <i>The Great North Road site includes significant areas of Grade 2 and 3a land, classed as BMV under the Agricultural Land Classification system. CPRE’s analysis of operational solar farms in Getting Solar Off the Ground, 2025 shows that nearly two-thirds of large-scale schemes already occupy such highly</i>	The Applicant has responded to the concern raised in your Relevant Representation regarding the use of BMV land within Table 3-6 Responses to CPRE Nottinghamshire, the countryside charity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 41. Table 4- 9 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 314, sets out the Applicant’s responses regarding the practicality of sheep grazing. The sheep grazing regime is the subject of ongoing discussions with the Nottinghamshire Wildlife Trust, as set out in Section 2 of the Statement of Common Ground with the Nottinghamshire Wildlife Trust [EN010162/APP/8.11A].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
	<i>productive farmland. This proposal would exacerbate that trend, undermining national food security goals and displacing agricultural production so that food imports become more prevalent.</i> <i>Claims of sheep grazing beneath panels are not credible. The inevitable shading from industrial sized solar panels reduces grass quality, animal husbandry is impractical within fenced arrays, and sheep numbers are declining nationally. Using prime agricultural land for inefficient grazing is a poor substitute for food production.</i>	
PRoW		
Section 4	<i>"The amenity value of public rights of way would be severely diminished by this proposal. Walking, cycling, and riding through open countryside cannot be compared to traversing tunnel-like corridors hemmed in by industrial solar and battery infrastructure.</i> <i>CPRE's Tranquillity Map, 2007 and subsequent exercise with local authorities Give Peace a Chance, 2015 evidences the health and wellbeing benefits of access to open green</i>	Effects relating to amenity and health of PRoW users have been assessed throughout relevant chapters of the ES. ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18B] provides an assessment of the combined recreational amenity effects that may result from visual, noise, traffic, glint, and glare impacts. Supporting information is provided in the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4] and ES Volume 4, Technical Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
	<i>spaces: "Tranquillity is not just a valued pleasure: there's plenty of evidence it has important benefits. Research has demonstrated that exposure to nature and, better still, immersion in it, is good for our health and wellbeing. It reduces our stress levels, improves our mood and makes us feel good about ourselves. Areas that are tranquil give us the chance to get away from the pressures of modern life and recharge our batteries. They are part of our natural health service.</i> <i>The proposed diversions and new permissive paths do not compensate for the loss of existing routes through open farmland. The scale of inverter noise, battery storage cooling noise, glint and glare and visual intrusion would degrade the countryside experience for generations".</i>	Within the Order Limits, approximately 60% of the total area will consist of above ground infrastructure during the operational phase. These areas would be disaggregated over a wide area and would not create substantial barriers for movement. The Development has been designed with embedded mitigation and enhancement measures to ensure that significant effects on recreational receptors are avoided where possible throughout the construction, operation and decommissioning of the Development. Where routes run adjacent to solar panels, there will be a minimum of 10 m between the centre of the route and solar PV panels. New and retained hedgerows will be maintained throughout the life of the Development, with new trees incorporated throughout where appropriate to screen views of panels from the route. Detail on the vegetation proposals is set out in ES Volume 4, Technical Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
<i>Flood risk and Drainage</i>		
Section 5	<i>"Large-scale solar can alter hydrology, increasing runoff and localised flooding, putting rural communities at even greater risk. We are pleased to see that the County Council has instructed an independent consultant to review these proposals and ensure clear, enforceable drainage strategies that protect farmland, villages and nature reserves".</i>	Noted. Please refer to the Applicant's responses to NCC LIR Ref. 5.3.5 within Table 2-3, Responses to NCC Comments on Flood Risk and Drainage, above. The Applicant is currently in discussion with NCC and the EA regarding some outstanding flood risk matters, which are reported in Section 2.3 of the updated Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1A] and Section 2.1 of the Draft Statement of Common Ground with the Environment Agency [EN010162/APP/8.3A] .
<i>Ecology and Biodiversity</i>		
Section 6	<i>"We share Nottinghamshire County Council's concerns about sites designated as Local Nature Reserves being assessed for decommissioning impacts against the current baseline, rather than the future baseline. Over a forty-year lifespan, habitats and species will change, potentially making sites more sensitive. We would like to see future-proofed ecological assessments in this regard".</i>	Noted. Please refer to the Applicant's responses to NCC LIR Ref. 5.2.6 within Table 4-5 Responses to NCC Comments on Ecology and Biodiversity, above.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
<i>Health and well-being</i>		
Section 7	<i>“Local residents face the prospect of significant health and wellbeing impacts. Inverter noise and noise created by the cooling of battery energy storage systems (BESS) are intrusive to local receptors, particularly those with medical conditions, now common in the UK, which increase sensitivity to noise and infra-noise.</i> <i>BESS installations also pose risks of thermal runaway “fire” resulting in dangerous fumes, toxic water run-off and long-term soil contamination.</i> <i>The psychological impact of losing open countryside for forty years cannot be underestimated. Office of National Statistics data shows declining access to nature since 2020, with measurable health costs. This proposal would accelerate that trend, depriving communities of restorative landscapes”.</i>	The Applicant has responded to the concern raised in the Relevant Representation regarding the use of BMV land within Table 3-6 Responses to CPRE Nottinghamshire, the countryside charity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 42. In terms of noise impacts, ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055] concludes that the Development would not result in a significant noise impact. Further responses on this is provided within Table 4-10 Noise and Vibration of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 324. The Applicant has considered the social and community impacts in relation to the users’ enjoyment, health and wellbeing. These effects have been assessed in Section 16.4.7 of the ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] and summarised in Section 16.5.8. Based on the assessment sets out in the ES, the Applicant considers that the proposal complies with the policies in NPS EN-1 and NPS EN-3.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
<i>Principal of Development</i>		
Section 8	<i>"Although described as "temporary," a forty-year consent represents a lifetime impact for many residents and at least two generations of families. Construction and restoration of the site to its current condition would add many years beyond that. In practice, this is permanent industrialisation of the countryside. In refusing a 49.9MW solar farm in December 2022 (appeal reference 3299953), the Inspector said "I consider that 40 years is a very significant period in people's lives during which the development would seriously detract from landscape character and visual amenity"</i>	The Applicant has responded to the concern raised in your Relevant Representation regarding the temporary nature of the Development within Table 3-6 Responses to CPRE Nottinghamshire, the countryside charity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 42. Section 6.9 of the Planning Statement [EN010162/APP/5.4B] then concludes that with the implementation of ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036] to ensure the land will be restored to a suitable use. Accordingly, the Development complies with NPS policy regarding the Development's lifetime and decommissioning. The Applicant considers that the Berden Hall Farm appeal² provides helpful explanation in terms of the duration of solar projects and the objectives these projects are seeking to address. Paragraph 32 of that Appeal Decision notes that 'A period of 40 years is a long time in terms of the human lifespan. However, I would question whether that is the correct way to measure the duration of the proposal. Tackling the effects of climate change is not a short-term project. We are still some way off 2050, when 'net zero' is meant to be attained, and it is fair to observe too that if/when 'net zero' is attained in 2050, it will need to be maintained thereafter. In simple terms, current generations are being

² Land at Berden Hall Farm, Ginns Road, Berden [PINS Ref: S62A/22/0006]
https://assets.publishing.service.gov.uk/media/669923f549b9c0597fdaffc1/S62A_22_0006_Decision_Notice_and_Statement_of_Reasons.pdf

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
		<i>asked to take action to address the impacts of climate change in their lifetimes, with the attendant impacts of those actions'.</i>
<i>General</i>		
Section 9	<i>CPRE believes climate change is a major threat to the countryside and supports decarbonisation, but we insist that it can be achieved in a better way:</i> <i>• Rooftop Revolution: CPRE's Shout from the Rooftops, 2025 report shows potential for up to 117 GW of solar from roofs and developed spaces by 2050.</i> <i>• Brownfield First: Solar should be prioritised on warehouses, farm barns, car parks, and brownfield sites.</i> <i>• Better strategic planning ahead of long-term planning decisions:</i> <i>• Land Use Framework: As CPRE argued in its consultation response, multifunctional land use must balance food, nature, housing, and energy. Productive farmland should not be</i>	CPRE's vision is noted. As stated in Table 3-6 Responses to CPRE Nottinghamshire, the countryside charity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 42, there is a demonstrable and urgent need for the Development as reflected in national policy.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
CPRE Nottinghamshire, the countryside charity [REP1-087]		
	<i>sacrificed when alternatives exist and tenant farmers should be protected.</i> • <i>Strategic Spatial Energy Plan: Should apply on implementation to early-stage mega-energy projects as well as new projects and must integrate both landscape protection and early, meaningful community involvement.</i> • <i>Community Energy: Smaller-scale, locally owned projects can deliver clean power without overwhelming landscapes.</i>	

4.7 RESPONSES TO EAKRING PARISH COUNCIL 'S WRITTEN RESPONSE

Table 4-6 Responses to Eakring Parish Council

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
<i>Introduction</i>		
	<i>"Eakring Parish Council submits its strong and unambiguous objection to the Great North Road Solar Park. The evidence supplied in our</i>	Noted. The Applicant has provided responses to matters raised by Eakring Parish Council in the Relevant Representation Report, as presented in Table 3-8 of the Responses to Relevant

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	<i>Phase 2 community consultation response, submitted February 2025, demonstrates that the scheme would cause unacceptable, irreversible and wide-ranging harm to our landscape, heritage, biodiversity, agricultural land, public rights of way, rural economy, tranquillity and wellbeing. Our objection is based on detailed local analysis, supported by national planning policy, conservation status, ecological records, local designations and heritage evidence. The reasons are set out belowv(from EPC Phase 2 response)".</i>	Representations [EN010162/APP/8.16A], with a further summary of the Applicant's position set out at paragraph 1.7.11 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. The Applicant wishes to provide additional responses and clarification to the matters that have been raised.
Landscape and Visual		
Section 1	<i>The proposal fundamentally conflicts with the character of the Trent & Belvoir NCA (NCA 48). Eakring is described as a "predominately rural, sparsely settled landscape with fertile soils, low visual intrusion and quiet lanes"</i> <i>Major harms include:</i> • <i>Industrialisation of historically open farmland.</i> • <i>Panels visible from properties including Eakring Windmill (Grade II) and Bleak House.</i>	The extract quoted from the NCA 48 description (available here: https://nationalcharacterareas.co.uk/trent-and-belvoir-vales/key-characteristics/) is highly selective and does not describe the fundamental character of NCA 48. Effects on NCA 48, taking account of the change from open arable farmland to solar farm, are considered at paragraph 47 of ES Volume 4, Appendix 7.5: Non-significant effects [EN010162/APP/6.4.7.5] [APP-212].

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	• <i>Fields DB015–DB018, especially DB015/DB016 (north-facing slope), highly visible from the A616, creating landscape scarring.</i> • <i>Loss of traditional views from PROWs and the Robin Hood Way.</i> • <i>Visual clutter from perimeter fencing, CCTV, substations and infrastructure.</i> • <i>Significant glint and glare across the village's viewpoints.</i> <i>This is direct, permanent character harm to a Conservation Village whose setting is central to its designation.</i>	The effects of the development on views from homes is considered in the ES Volume 4, Appendix 7.6: Residential Visual Amenity Assessment [EN010162/APP/6.4.7.6] [APP-213]. The homes listed are outside of the RVAA study area and changes to views would not give rise to effects which may potentially exceed the RVA threshold. The fields referred to as DB015 and DB016 are located to the south of the local road between Tug Bridge Farm and Eakring. As shown by ES Volume 3, Figure 7.1 ZTV Study [EN010162/APP/6.3.7A] [AS-035], these fields are more than 2km from the A616. Extensive visibility of these fields was not noted during site work and the scale of change to views for the section of the A616 closest to this part of the development is identified as Negligible. Effects on views from PRoW around Eakring are considered at section 7.7.10.5 of the ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] and illustrated by Figures 7.6 and 7.7 in ES Volume 3, Chapter 7 Landscape and Visual Impact Assessment Figures (Part 1 of 6) [EN010162/APP/6.3.7A] [AS-035]. Major/moderate, Adverse and significant visual effects are identified during construction, operation and decommissioning. Effects on views from Robin Hood Way are considered at paragraph 48 (page 10-11) of ES Volume 4, Appendix 7.5: Non-significant effects [EN010162/APP/6.4.7.5] [APP-212]. Effects arising from all components of GNR have been considered in the assessment of effects provided in the LVIA.

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
		Glint and glare is considered in ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059]. The potential for glint and/or glare to be experienced by visual receptors as they move through the landscape is implicitly considered as one of the visual characteristics of the proposed development and taken account of in the LVIA. Effects on the Conservation Area at Eakring are considered at paragraphs 235-244 of ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] which identifies that "<i>the Development will not harm any aspect of the Conservation Area which contributes to its character or appearance or its special interests.</i>"
<i>Traffic and Access</i>		
Section 2	<i>The proposed HGV access route is dangerous, unsuitable and high-risk:</i> • 250 vehicle movements/day (60+ HGVs) through a narrow rural lane with a drainage ditch on one side and historic species-rich hedgerow on the other (Sanderson's Map 1834)	The Applicant has responded to these comments in Table 3-8 Responses to Eakring Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 48. The vehicle movements per day and number of HGVs on the road leading to Eakring being quoted are not recognised. Traffic volumes along this link are given in Table 14.15 of ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A]

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	• Road used daily by cyclists, joggers, walkers, horse riders and children travelling to Kneesall Primary School. • 15 passing places proposed across 4.5 miles — 9 within 2 miles of Eakring — introducing danger, delays and further habitat loss. • The bridge at Tug Bridge Farm is narrow and unsuitable. • Frequent flooding from Kersall Junction towards Penny Pasture LWS and Maplebeck Meadows SSSI. <i>This scale of construction traffic is unsafe and incompatible with rural roads and vulnerable road users</i>	
<i>Ecology and Biodiversity</i>		
Section 3	<i>Species regularly present within the fields proposed for panel coverage include:</i> • Protected or priority species: Yellowhammer, Skylark, Lapwing, Tree Sparrow, Starling, Linnet, Yellow Wagtail, Kestrel, Red Kite, Buzzard, Barn Owl.	Please refer to the Applicant's responses in Table 4-2 of the Responses to Relevant Representations [EN010162/APP/8.16A]https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010162-000676-GNR_8.16_Responses_to_the_Relevant_Representation_Report.pdf. The Applicant's approach to the biodiversity mitigation and enhancement is summarised has been discussed and

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	• <i>Mammals: Brown Hare, Roe Deer, Fox, Badger.</i> • <i>Bats: Using hedgerows, edges and hunting corridors.</i> • <i>Water Voles: Confirmed in Caunton Beck adjacent to DB018.</i> <i>The scheme would:</i> • <i>Fragment habitat networks.</i> • <i>Block movement corridors with fencing.</i> • <i>Reduce foraging habitat across hundreds of acres.</i> • <i>Increase disturbance through construction noise and lighting. Nearby designated sites at risk include:</i> • <i>Eakring Meadows LWS / SSSI (neutral grassland)</i> • <i>Eakring & Maplebeck Meadows SSSI (alluvial neutral grassland with breeding birds)</i> • <i>Redgate Woods & Mansey Common SSSI (ancient woodland & dumble habitat)</i>	summarised in Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. Nearby designated sites are identified in ES Volume 4, Appendix A8.2: Ecology and Biodiversity Designated Sites Baseline [EN010162/APP/6.4.8.2] [APP-215] and effects on them assessed in section 8.8.6 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A]. No significant adverse effects are predicted. Significant beneficial effects are predicted for some Local Wildlife Sites.

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	<i>Solar industrialisation around these sites is ecologically incompatible</i>	
<i>Cultural Heritage</i>		
Section 4	Eakring is an exceptionally historic settlement: • A Conservation Village whose medieval street pattern and ancient lanes remain intact. • Grade II* Church of St Andrew. • Four Grade II listed domestic properties, including Eakring Windmill. • Red K6 phone box, war memorial, stone water troughs. • Below-ground archaeology (subrectangular enclosure, fish ponds, terraces, ridge-and-furrow). • Two Ancient Trees of national significance recorded by Woodland Trust. • Historic oil extraction history at Dukes Wood (now a heritage and ecological	The Applicant's responses to the concerns raised on the effects to heritage assets in Eakring in Table 4-2 of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 50, suggests that the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures.

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	site). The proposal introduces industrial structures into this heritage setting, causing setting harm of national significance.	
<i>Public Rights of Way</i>		
5	Eakring's footpath and bridleway network is one of its defining characteristics. Panel fields DB015–DB018 sit alongside or across: • The Robin Hood Way LDP • Footpaths to Maplebeck • Historic open-field lanes • Popular cycle routes used for charity rides Harmful effects: • Loss of panoramic rural views • Glint & glare impacting walkers and riders • Deterrence of PROW use due to fencing, CCTV and industrialisation	ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18B] provides an assessment of the combined recreational amenity effects that may result from visual, noise, traffic, glint, and glare impacts. Supporting information is provided in the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A] and ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1A]. Impacts on the Robin Hood Way LDR are assessed within ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]. The majority of the LDR is located outside the Order Limits, but an 80 m section (0.03% of the overall route) enters Work no. 3, mitigation, in field 456. The nearest construction activity would be associated with Work no. 1, solar PV, which is 180 m north of the LDR. The Development has been designed with embedded mitigation and enhancement measures to ensure that significant effects on recreational receptors are avoided where possible throughout the construction, operation and decommissioning of the Development.

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	• Deletion of a historic footpath in DB015 (opposed strongly by parish) This is a major public amenity and wellbeing impact.	Where routes run adjacent to solar panels, there will be a minimum of 10 m between the centre of the route and solar PV panels. New and retained hedgerows will be maintained throughout the life of the Development, with new trees incorporated throughout where appropriate to screen views of panels from the route. Detail on the vegetation proposals is set out in ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B]. Proposals for closures and re-routing have been avoided where practicable. As set out in Environmental Statement Volume 3, Chapter 18 Recreation Figures [EN010162/APP/3.18A], diversions of PRowWs during the operation phase are limited to routes that cross arable fields. Whilst it is acknowledged that local people value access to local routes, it is considered that PRow crossing arable fields generally retain limited historic character. Diversions are proposed to two PRow within Eakring. 170 m of the 770 m NT Eakring FP13 would be closed and replaced with 220 m of footpath which would follow the edge of the solar PV area. The route would still provide access between Newark Road and the unnamed road at grid reference 468385E 362326N and connect to NT Eakring FP16. NT Eakring FP14 would have 540 m of the 570 m route closed and replaced with 430 m of footpath which would follow the edges of the solar PV area. The route would be more direct and continue to provide a connection between footpath NT Eakring FP13 and NT Eakring FP16. Impacts on

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
		these routes are assessed within ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A] .
<i>Land Use</i>		
6	<i>All affected fields are Grade 2 (ALC) Very Good Quality Agricultural Land — explicitly protected under NPPF.</i> <i>This land:</i> • <i>Provides high-yield food production</i> • <i>Forms part of the medieval three-field system still visible in the landscape</i> • <i>Supports local farming economy</i> <i>Solar panels on BMV land represent a direct conflict with national policy and an irresponsible long-term sterilisation of productive farmland.</i>	The Applicant has responded to these comments in Table 3-8 Responses to Eakring Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 51.
<i>Socio-economics, Tourism and Recreation</i>		
7	<i>Eakring is valued for its:</i> • <i>Quietness and remoteness</i> • <i>Elevated countryside views</i> • <i>Wildlife presence</i>	These matters have been considered in the ES, in the following chapters:

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	<i>Construction impacts include:</i> • Noise, vibration, pollution • Loss of tranquillity • Disturbance of wildlife • HGV fear, intimidation and danger <i>Local businesses affected:</i> • The Daffodil Tearoom – popular with walkers, riders, cycling clubs. • Cabin in the Country – marketed for views and rural setting. • Multiple equestrian businesses, including livery and professional riders. <i>These assets depend on rural quality — which the proposal undermines.</i>	ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055] ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A] ES Volume 2, Chapter 19: Interrelationships [EN010162/APP/6.2.19A] No significant effects on receptors in Eakring have been identified.
<i>Cumulative Impact</i>		
8	<i>“Eakring already hosts: • A wind farm • A solar farm • Additional solar adjacent to parish</i>	The Applicant's approach to the assessment of cumulative effects and the findings has been discussed and is summarised in Section 1.7 of

WR Section Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP1-073]		
	<i>boundary Adding a national-scale NSIP would create:</i> <i>"An industrialised landscape for generations to come."</i> <i>This cumulative harm is unacceptable and exceeds reasonable capacity for rural Nottinghamshire.</i>	the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. Further details on the cumulative landscape and visual effects are provided in Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].

4.8 RESPONSES TO FORESTRY COMMISSION'S WRITTEN RESPONSE

Table 4-6 Responses to Forestry Commission

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Forestry Commission [REP1-080]		
<i>Ancient Woodland</i>		
	Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states: <i>"The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of</i>	The Applicant has responded to these comments in Table 3-11 Responses to Forestry Commission of the Responses to Relevant Representations [EN010162/APP/8.16A], on pages 84-85. To reiterate, the 15 m buffers from ancient woodland were important parameters during the evolution of the Development design to help

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Forestry Commission [REP1-080]		
	<i>any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists."</i> We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England. The joint Natural England and Forestry Commission Standing Advice on Ancient Woodland advises that the size and type of buffer zone should vary depending on: • scale and type of development and its effect on ancient woodland, ancient, and veteran trees • character of the surrounding area For example, larger buffer zones are more likely to be needed if the surrounding area is: • less densely wooded Whilst the Standing Advice advises that buffer zones should be at least 15m from the	avoid and reduce potential adverse effects. As stated section A8.12.1.3 of Volume 4, Appendix 8.12: Arboricultural Impact Assessment (AIA) [EN010162/APP/6.4.8.12] [APP-225], following consent, arboricultural constraints will be reviewed to inform the final design. This process will update and repeat the Preliminary Arboricultural Appraisal and Screening Impacts to identify additional locations needing further targeted surveys and assessment. This process will also identify locations where larger exclusions buffers or buffers with different habitats (e.g. ecotones rather than grassland) would be appropriate. This is reflected in the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] which includes a commitment to increase the size of the default 15 m root protection area if a tree is identified as ancient or veteran. With these measures in place, which include a mechanism for larger buffers where appropriate, there will be no loss or deterioration of ancient woodland and paragraph 5.4.53 of NPS EN-1 would not be engaged.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Forestry Commission [REP1-080]		
	boundary of the woodland, it states that where assessment shows impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. Considering the scale and type of the proposed development, the character of the area, and that the area is not densely wooded, but consists of an ecological network of ancient woodland habitats and other priority deciduous woodland habitats, a 15m buffer zone is likely to be insufficient to ensure no loss or deterioration of ancient woodland habitats. The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer zone requirement be increased	
	When assessing impacts to ancient woodlands, there is a need to consider both the direct and indirect impacts of the development. Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning	The comments are noted and the assessment in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] address these requirements.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Forestry Commission [REP1-080]		
	trees. Indirect impacts can include reducing the amount of semi-natural habitats next to or ecologically connected to, ancient woodlands, reducing the ability of fauna, such as bats and invertebrates to feed in the areas surrounding the ancient woodlands, increasing the amount of dust, light, air or soil pollution, changing the landscape character of the area or severing habitat connections, which is a known cause of habitat degradation and biodiversity decline. Due to the irreplaceable nature of ancient woodlands and ancient, and veteran trees, most temporary effects will result in permanent harm	
Ecology and Biodiversity		
	The mitigation hierarchy as referenced in the National Policy Statement for Renewable Energy Infrastructure (EN-3), has as its first principle, the avoidance of harm to biodiversity. Whilst we recognise that the applicant has committed to providing a biodiversity net gain (BNG) uplift of 11% voluntarily, ahead of the introduction of BNG requirements for NSIPs, the presence of	ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A] confirms that no ancient woodland or other irreplaceable habitats will be lost.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Forestry Commission [REP1-080]		
	irreplaceable ancient woodland habitats, means that avoiding biodiversity loss within these habitats must be the priority.	
	The ancient woodland Standing Advice specifically highlights development scale and type as considerations when assessing an appropriate buffer zone, to avoid loss or deterioration to ancient woodland. The minimum buffer zone of 15m may be sufficient for small scale development in proximity to ancient woodlands, but for large scale developments, set within complex and sensitive networks of irreplaceable, semi-natural and priority habitats, the advice points to larger buffer zones likely being needed.	As per the response above, the controls proposed through the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] and future requirement to update the Preliminary Arboricultural Appraisal and Screening Impacts will secure larger buffer zones where appropriate and ensuring no deterioration of Ancient Woodland.

4.9 RESPONSES TO JOHN ANTHONY GRAY'S WRITTEN RESPONSE

Table 4-7 Responses to John Anthony Gray

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
John Anthony Gray [REP1-118]		
<i>Ecology and Biodiversity</i>		
Page 3	Following ExA's unaccompanied site inspection US11 visit to the site of the proposed Community Orchard [EV-001,p.2], and the exchange of comments in the morning session of the enquiry on 27th November [ISH1 PT3,p.8], ExA have requested the applicant to "Provide a note with further details on management of the Community Orchard" [ISH1 Actions,p.2, Item 10]. Clarification requests prompted by APP s: i. Is there a full plan and design document, with detailed proposals, in existence? If not, when will there be one available? ii. The applicant says "The orchard is accessible via PRoW." [APP-061,p.46]. Where do the actual boundaries of the Community Orchard lie? The current route of Bathley Footpath 8 [NCC Footpath Modification] is shown as within	Further details on management of the community orchard is provided in Table 2-1 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. The design of the landscape is then secured by Requirement 8 of Schedule 2 of Draft Development Consent Order [EN010162/APP/3.1C], which would provide the detailed design and landscape and ecological management plan for the relevant phase of the Development.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
John Anthony Gray [REP1-118]		
	the Order Limit, but is it considered as within the Community Orchard boundary? If so, will there be fences/stiles controlling public access? Or even “gated and closed at night” as talked of in Maplebeck [APP061,p.17]? iii. Who owns the Community Orchard and the land it is to be developed on? Which organisation/business is expected to manage the orchard on a day-to-day basis, during construction and thereafter? ii. One of the design objectives included in [APP-201,p.5] is “Creation of Community Orchards to engage and promote community involvement” and [APP-313,p.39] claims that during consultation “Respondents support the creation of the proposed community orchard/picnic areas.” but I can find no specific reference in the Consultation Report [APP-296] to the community orchard. Is there data to indicate this support will translate into involvement? iii. Are there any other community orchards being planned? Given that this proposal is in a	

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
John Anthony Gray [REP1-118]		
	relatively unpopulated area, how realistic is it to expect iv. In [APP-269,p.21] a “potential location for a community archaeological project [...] at the site of the proposed community orchard” is mentioned. Is this project being developed? v. In the consultation booklet [APP-308,p.49] refers to “NG+ Support for Community Initiatives”, specifically mentioning the Community Orchard. Has any sum been decided on and, if so, who will be the recipient(s)?	
<i>Public Rights of Way</i>		
Page 4 and 6	Permissive Footpath 3 (PF3) is a welcome connection between Bathley FP11 to the south and Bathley FP8 and Permissive Bridleway 1 to the north. As such, the proposed path is the enabler of a more connected walkers' network than currently exists. A Bathley resident (who I know from many years using the Bathley footpaths, but with who I have no commercial or financial connections)	Permissive Footpath 3 is located 10 m from the edge of the pond. There would be no impact on water quality as a result of the path, and therefore, no impact on the fish stocks. Appropriate signage will be installed along the route requesting that dogs are kept on leads in the vicinity of the pond, thereby reducing the risk of disturbance. This is committed to in paragraph 36 of ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1B]. It is reasonable to assume that the wildlife associated with pond is tolerant of a degree of disturbance from ongoing fishing activities and the

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
John Anthony Gray [REP1-118]		
	expressing concerns about the impact of PF3 on his business. The resident's concerns below and have provided his full statement in the Annex on p.5 at the end of the document:- • PF 3 will pass very close to Bathley Trout Pond, which is a registered fishery (DEFRA and CEFAS). The pond is a site of active wildlife protection, including a baited mink raft licensed by the Water Life Recovery Trust, which targets American mink to protect water voles. • Bird feeders support a variety of birds such as ducks, geese, swans, pheasants, partridge, songbirds, water hens, and coots. The pond is used by kingfishers, swallows, and house martins during breeding season, and these species could be disturbed by increased foot traffic. • Fly-fishing (catch and release) occurs at the pond, and the activity could pose a safety risk to walkers due to the danger of back casts. The pond is deep (10–18 feet), presenting a safety hazard. There is concern that dogs could enter	stocking of bird feeders and that additional recreation activity, which would be comparatively infrequent, transient and at a greater distance from the pond, would not greatly contribute to this disturbance.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
John Anthony Gray [REP1-118]		
	the pond, disturbing wildlife and risking their own safety. Realigning the currently proposed PF3 route between B and C via point C+ would provide a minimum separation of 25m between PF3 and the pond; use an established (and dry) field track B-C+, and then follow a 60m new path along the southern edge of a minor dyke to rejoin the route at C. The statement reads as follows: “With regard to the permissive footpath 3 at Bathley, proposed by Elements Green, which is shown to pass close to Bathley Trout Pond, which is a registered fishery no. EW058-L-927F, grid reference SK78455909 it is registered with DEFRA and CEFAS. This pond is in an area where wildlife protection is carried out. It has a baited mink raft on it which is licensed by the Water Life Recovery Trust reg. charity no. 1198223. This organisation is recognised by Natural England and a number of other conservation organisations. The mink raft is designed to catch the American mink which predated on the water vole. Bird feeders are	

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
John Anthony Gray [REP1-118]		
	placed around the pond for the benefit of ducks, geese, swans, pheasants and partridge and songbirds, water hens and coot. Kingfishers, swallows and house martins use the pond in the breeding season and would suffer from disturbance. Fly-fishing takes place (catch and release). The back cast would be a danger to persons walking close to the pond. The pond is dangerous, having a depth of between 10 and 18 feet, and would therefore be a safety hazard. There is a strong possibility that it could be a habitat for newts as they have been found in the vicinity. There is also no doubt that dogs would be allowed to get into the pond causing disturbance to the wildlife and posing a risk to the dogs themselves. With regard to all the above I suggest the permissive footpath 3 is moved to the position shown on the attached plan. I wish this submission to be sent by Dr. John Gray."	

4.10 RESPONSES TO JPAG 'S WRITTEN RESPONSE

Table 4-8 Responses to JPAG

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP1-093]		
<i>Cumulative Effect</i>		
Para 4	<i>"Following the Issue Specific Hearing 1, JPAG wishes to supplement its oral submissions with an additional contribution on the matter of cumulative impact. Set out in this document are a series of annotated maps that show the various projects and developments that are closest to the GNR scheme and add to the clustering and concentration of schemes, by effectively filling in the gaps within the doughnut".</i>	The cumulative assessment presented in the ES accounts for all the schemes identified in the JPAG response [REP1-093] except Grassthorpe Beck, which is at a very early stage (pre-consultation, pre-submission) and about which insufficient is known at this stage for it to be included in a cumulative assessment. Cumulative effects would be assessed in its application for planning permission, if lodged, and this would take account of the Development.
Paras 5-6	<i>Since the Issue Specific Hearing 1 was held, planning permission has been granted on appeal for the Kelham Solar & BESS project (APP/B3030/W/25/3364181 – decision dated 3rd December 2025). A copy of the Appeal Decision is attached.</i> <i>In that appeal decision the Inspector draws attention to the fact that it is for the Examining Authority to consider the cumulative impact,</i>	The written summary note of ISH1 indicates that Kelham Solar Farm has already been considered in the LVIA cumulative assessment, and the ES includes a cumulative assessment of it for other topics as appropriate. The fact that it has now been consented does not change the findings of the cumulative assessments, which are carried out on the basis that any pre-consent projects will be consented.

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP1-093]	<i>clustering and concentration arising from the GNR scheme in light of the other projects permitted. The Inspector also said it was for the Examining Authority to consider the sequential views and experience of moving through the GNR and other projects permitted.</i>	

4.11 RESPONSES TO LAXTON AND MOORHOUSE SOLAR CONCERNS'S WRITTEN RESPONSE

Table 4-9 Laxton and Moorhouse Solar Concerns

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
<i>Introduction</i>		
Page 2	<i>"The village of Moorhouse, accessed solely by single, narrow track lanes, sits in ancient agricultural land, currently classed as 'Best Most Versatile' by the Country Land and business Association (CLA). Strip farming is still practiced in Laxton and is held nationally as the most complete example of farming in medieval times. The District Council's Land Character Assessment (LCA), gives the area its highest rating in both character and conservation requirement, describing Moorhouse as having strongly unified elements and few distracting features."</i>	The Applicant notes the comments on the landscape character value in Moorhouse and Laxton. and the concerns on food security, biodiversity and the need for the Development. The Applicant's response to the comment on the landscape character is set out within Table 3-14 <i>Responses to Laxton & Moorhouse Parish Council</i> in the Responses to Relevant Representations [EN010162/APP/8.16A], on page 114. The claims regarding Agri-voltaics and biodiversity have been addressed and reported in the Applicant's responses to Laton and Moorhouse Parish Council, as set out in Table 3-14 within the Responses to Relevant Representations [EN010162/APP/8.16A], starting from page 106 to page 116.
Page 3	<i>"In general, Laxton and Moorhouse Solar Concerns (L&MSC) are not against renewable energy initiatives (its lead taught Sustainable Power and Energy Engineering at Masters level) though take a more holistic view to</i>	The need for the Development has been set out in Statement of Need [EN010162/APP/7.2] [APP-324], which suggests that large-scale ground mounted solar schemes such as the Development are necessary. The Applicant's overall approach to the selection and design of the Project is framed within the context of national policy. These

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>include food security and geographical considerations. Whilst the East Midlands comprises 13% of England's farmed area, it produces 20% of its arable output [1] in a country that is only 60% sufficient in food production [2]. It therefore seems a poor use of Best Most Valuable agricultural land (BMV) for solar arrays. Equally, The East Midlands is not a good area for solar farm placement. Placing a similar array in southerly counties (50deg latitude) would experience 10% greater irradiated solar energy [3] and for 10% more sunshine hours per year. [4]. Finally, there are more than 250,000 hectares of commercial south facing roofing [5] that could be employed for solar capture and their distributed nature would lessen the need for distribution infrastructure upgrades. As such, whilst an excellent business opportunity exists for the developer, the Needs Case for The Great North Road Solar Array is weak and made less convincing by the developer's less than open attempts to deflect from this through unsubstantiated claims regarding Agri-voltaics and biodiversity"</i>	matters are also discussed in the Issue Specific Hearing 1 and are reported in Section 1.4 and 1.6 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
<i>Flood Risk, Drainage and Water</i>		
Page 3	<i>“Moorhouse is uniquely situated within the proposed solar array in that it lies on the main drainage into the Trent for the array area. Lying in a shallow valley, Moorhouse already suffers, from flooding to its properties, roads, hedgerows from Moorhouse Beck and its tributaries. The Parish Flood report of 2023 highlighted that Laxton is surrounded by higher farmland and consequently receives its surface water run-off. (Supportive pictures in Appendix A) Downstream from Laxton, Moorhouse receives all of the Laxton water and additional surface water run-off from South Field, Kneesall Woods, Laxton Woods and North Wood [6]. 2023 saw Moorhouse Beck overwhelmed through Moorhouse causing flooding or near flooding to a significant number of properties. (Pictures at Appendix A.) It was notable that the flooding was not prolonged and was a function of the Beck and its tributaries being unable to handle the volume of water draining from the fields in this area. Any actions that exacerbate runoff will undoubtedly widen the flood damage area and</i>	The Applicant's responses on this matter is provided within Table 3-14 <i>Responses to Laxton & Moorhouse Parish Council</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 108.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>should be prevented. In their work on the impact of solar panels on runoff, Biamonte et al's empirical research showed that peak runoff is increased 11 times from a field with solar panels compared to the same field with no panels in temperate climates [7]. The solar panels in and downstream of Moorhouse are in fields who's run-off is directly into the beck. This was raised with EG at the consultation phase [8] and their response was to provide a riparian corridor through the panelled area. Unfortunately, being downstream of Moorhouse, this is likely to slow water flow away from the village, exacerbating, not relieving the flooding problem.</i> <i>Also raised during consultation was the issue of traffic damage to the bridges in Moorhouse and, or subsequent blocking of the beck or it tributaries downstream by construction debris. This resulted to a change in traffic plans. It is unclear how traffic will be policed to prevent the use of Moorhouse roads, acknowledged by Elements Green as being an issue, and as such, remains a risk. It is of note that the largest change to the solar panel array design following the Consultation Phase has been to remove areas of panels in the Carlton area that</i>	

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>were in direct threat from flooding. It is disappointing that the same concern and mitigation has not been provided to the third party flooding risks."</i>	
<i>Ecology and Biodiversity</i>		
Page 444	<i>"The Bird Conservation Targeting Project (BCTP) identifies this area as significant for rare and declining farmland and/or woodland birds, in particular the lapwing, which is Red Listed by the Royal Society for the Protection of Birds (RSPB) and is a Priority Species under the UK Post -2010 Biodiversity Framework [9] and Wildlife and Countryside Act 1981 [10].</i> <i>The Laxton Sykes is a Site of Special Scientific Interest for Great Crested Newts with Moorhouse and its surrounds lying within the Impact Risk Zone and confirmed by EG's own survey carried out by Notts University. The newts breed in ponds during the spring, but spend the majority of the year feeding on invertebrates in woodland, hedgerows, marshes and tussocky grassland, typified in the Moorhouse area. The UK's populations of the great crested newt are internationally important and are protected under the Wildlife and</i>	The Applicant's responses on this matter is provided within Table 3-14 Responses to Laxton & Moorhouse Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 112.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. Solar Farm development in the Laxton and Moorhouse areas increase the risk to these endangered species.</i> <i>It has been identified that solar farms can have a negative impact on biodiversity through compaction of ground, cutting of grass in between panels, distance between panels, and the fencing off of large fields that prevent wildlife such as deer, foxes, badgers and other medium sized mammals gain access to woodland and other "cover" areas. Currently Moorhouse has an exceptionally healthy population of wildlife including Tawny and Barn Owls, Buzzards along with Little Egret and Heron. All these broad range species will be negatively affected by solar farms current proposals. In 2017 a Natural England report stated that solar farms fragment habitats and solar panels can affect the movement of species, hiding places, preying strategies and availability of food. The size of this array will undoubtedly be significant from this perspective.</i>	

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>In particular, the proposed changes to fields that border North Wood and Speakers plantation woodland, would have a major ecological impact on wildlife. The inclusion of extra wooded areas is seen as gerrymandering in a delicate eco-system frequented by Barbastelle bats, a rare and endangered species. In effect the solar park proposals in this area would surround long established wildlife rich woodland, effectively cutting it off for many species, not to mention its catastrophic visual impact and the impact on many species during construction. No assessment has been made on the effect to migratory paths across the region."</i>	
Land Use		
Page 5	<i>"The whole of the area surrounding Moorhouse and Laxton are ancient and continued use farmland. In medieval times the whole of Laxton and Moorhouse Parish was strip farmed with maps from the 1600's detailing land use held in Laxton Church and in the Bodleian Library [11]. Today Laxton still operates a strip farming system under a Court Leet which is</i>	The Applicant's response on this matter is provided within Table 3-14 <i>Responses to Laxton & Moorhouse Parish Council</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 112. The impacts and effects on agricultural land are described in the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A]. The provisional ALC map (Insert 17.1) and likelihood of BMV map (Insert 17.2) indicate that this is not the best quality (in terms of ALC grades) in the region. The land is in productive agricultural use or in

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>protected by 2020 Parliamentary undertaking given by the Thoresby Estate.</i> <i>In its Land and Character Assessment (LCA), Newark and Sherwood District Council describe the Moorhouse Meadows Landscape Condition as Good, and Sensitivity as 'High' with an overall aim of 'Conserve'. It considers Moorhouse to have strongly unified elements and few distracting features [12].</i> <i>It is the significance to agricultural output that is most compelling however. The East Midlands region comprises 13% of agricultural area [1] but produces 20% of its arable output [2]. The area set aside for development is some of the most fertile that this region has to offer [13]. This is well established agricultural land with a dedicated and capable workforce ensuring continuing production. Many are tenant farmers, who will gain nothing from the development, and it is hard to see how such a workforce will still exist to reuse the land when the array is decommissioned.</i> <i>As can be seen from the pictures in Appendix B, this is productive arable land."</i>	agri-environmental uses, as described in ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A]. The majority of the land within the proposed development is in arable use and for cereals and combinable crops (ie crops that can be harvested with a combine harvester). As set out in ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] at paragraph 193 et seq., whilst overall food self-sufficiency is around 62%, it is 75% for crops that we can grow in this country. For cereals, oilseeds and other non-vegetable arable crops, of the type grown in the Moorhouse and Laxton area, the UK is at or near to self-sufficiency. The Government has expressed no concern regarding food security. As set out in ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] at paragraph 208, in 2024 a total of 580,662 ha of the arable area of 4,968,220 ha (11.7%) was either in agri-environmental uses or uncropped. ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] considers the implications for food production including for the East Midlands region.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
<i>Cultural Heritage and Archaeology</i>		
Page 5	<i>“Moorhouse contains several heritage assets, notably the nationally significant Grade II* listed Moorhouse Chapel. Situated in open countryside north of the hamlet, the building is an attractive landscape feature. The chapel is mid-19th century (1860) and was built for J. E. Denison (1st Viscount Ossington) in a medieval French Gothic Revival style by the architect Henry Clutton (1819–1893), an English architect of national repute. Grade II* buildings are particularly important buildings of more than special interest (only 5% of the 374,081 listed buildings in England are Grade II* or above). The Chapel is therefore distinctive and has significant special architectural and historic interest. Other listed buildings in Moorhouse, including Church Farmhouse, Aggie House, and North Park Farmhouse, essentially 18th century farmsteads that characterise the Georgian aesthetics of the rural builds in this area. Local landowners in this area such as the Earl Manvers (see White’s Directory of 1835 for</i>	The Applicant’s responses on this matter is provided within Table 3-14 <i>Responses to Laxton & Moorhouse Parish Council</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 109.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>example) were responsible for maintaining these historic farmsteads and cottages from this period and are today managed under the Planning (Listed Buildings and Conservation Areas) Act 1990. Given the Historic England Guidance that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting it is felt that the solar arrays in adjacent fields compromise the approaches and vistas from the Grade II* listed Moorhouse Chapel"</i>	
Landscape and Visual		
Page 6	<i>"This largescale conversion from open fields to solar arrays would have disastrous consequences for the nature of the landscape and the local identity. Solar panels dramatically alter views of the countryside and the key features that punctuate it. Some adjacent fields are on north facing slopes and the impact of solar panels would be seen for may kilometres in a north/south direction. The largescale use of hedging will actually exacerbate the loss of view as they seek to</i>	The Applicant's responses on the LVIA effects of the Development on Moorhouse and Laxton is provided within <i>Responses to Laxton & Moorhouse Parish Council</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 111 and 114. Further information on the decommissioning arrangement of the Development is summarised in Table 4.5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 293.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>screen the panels, and the enclosure of rural footpaths will change them into sterile walkways rather than vantage points for appreciation of heritage assets and rural vistas.</i> <i>The Zero Carbon Academy [14] suggest that at end of life (around 25 years) 'the land should be restored as close as possible to its original state. To do so may require replanting of vegetation or crop, soil remediation, and/ or methods to improve and restore biodiversity.'</i> <i>Given that this is predominantly farmland, it is hard to see how farmers would simply be available after 30-40 years of non-production (including commissioning, operation and decommissioning) to recommence farming, or that the fallow and compacted land would be capable of its previous returns. Equally, given that some land is nominated for tree planting and other ecological development, it is unclear what should happen to this land during decommissioning or the arguments behind future use."</i>	

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
<i>Noise and Traffic</i>		
Page 7	<i>"Elements Green (Mr Noone, Ossington Meeting, 20/6/24) have previously suggested that work will be in 3-4 month windows of work for 2 years, though it is doubtful that this will be a requirement placed on the construction contractors. The Noise Risk Assessment for these activities is not clear for both wildlife and inhabitants. Given that Health and Safety Executive noise exposure limits [15] are unlikely to be breached in public areas, concern exists regarding Statutory Nuisance (Environmental Protection Act 1990) [16] over extended periods and details of work limits beyond the normal working day, public holidays etc. and we would look for assurance that this has been dealt with at an appropriate level of probity."</i>	The matter on construction programme has been addressed in Table 4-14 <i>Traffic and Access</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 343 to 346. Table 4-10 <i>Noise and Vibration</i> of the same Report, on page 324, further details the construction noise management.
<i>Needs Case</i>		
Page 7	<i>"Finally, the Needs Case for this array development has not been made. Although the established connection to the National Grid distribution network is suitable, solar arrays are not the only solution to sustainable energy"</i>	The need for the development has been discussed and summarised in Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
<i>production, with reduced footprint Small Modular Reactors having a number of advantages over distributed solar arrays, not least being their positioning within existing and decommissioned power station sites that exist on the network. Given that solar arrays have a place within the still immature technological gamut for sustainable energy, their siting on Best, Most Valuable farmland is not appropriate. Food security is equally as important as energy security and the willingness to ignore one when considering the other is flawed. The placing of solar panels in this geographical location, or further north, fails to maximise the benefits of their use (eminent research suggests a net energy loss during solar panel lifetime when placed north of 47 deg latitude [17]), making them a poor technological solution for the UK in Climate Change measures. If their use is to be included in a UK policy, siting a similar array at 50deg latitude would experience 10% greater irradiated solar energy [3] and for 10% more sunshine hours per year. [4]. Finally, there is more than 250,000 hectares of commercial south facing roofing [5] that could be employed for solar capture and their distributed nature</i>	068]. Action 5 of the Table 2-1 provides a response to the matter of the inclusion of some BMV land within the Development.	

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REP1-095]		
	<i>would lessen the need for distribution infrastructure upgrades. As such, whilst an excellent business opportunity exists for the Developer, the Needs Case for The Great North Road development is weak and made less convincing by Elements Green's less than open attempts to deflect from this through unsubstantiated claims regarding Agri-voltaics and biodiversity. It is recognised that an over production of solar panels abroad has made such solar farms financially attractive to investors, but it is less clear who will benefit from such financial benefit and how any solar production reduces electricity prices for the consumer under the dogmatic 'Contracts for Difference' pricing calculation. Equally, purchase of foreign equipment, merely exports UK CO2 production and at levels over which we have no control."</i>	

4.12 RESPONSES TO MARIE-LOUISE STEWART ON BEHALF OF ANDREW STEWART (FARMERS LTD), THE TOWARD AND STEWART FAMILIES, BEESTHORPE MANOR FARM'S WRITTEN RESPONSE

Table 4-10 Responses to Marie-Louise Stewart on behalf of Andrew Stewart (Farmers Ltd), The Toward and Stewart Families, Beesthorpe Manor Farm

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
Marie-Louise Stewart on behalf of Andrew Stewart (Farmers Ltd), The Toward and Stewart Families, Beesthorpe Manor Farm [REP1-120]		
<i>Introduction</i>		
5	<i>"The plan provided in the Written Submission identifies the fields forming the farm holding.</i> <i>The proposed solar farm adjoins the interested parties land and lies within 400m of Beesthorpe Manor Farmhouse. Under the current proposals, the operational solar array equipment is proposed to be sited on a promontory of land that adjoins land within the ownership of the interested parties and extends towards Beesthorpe Manor Farmhouse."</i>	Andrew Stewart (Farmers) Limited of Beesthorpe Manor Farm, one of the landowners which Ms Stewart represents, is included under Plot 10/14 of the Book of Reference [EN010162/APP/4.3C] in respect of an assumed highway subsoil interest. Plot 10/14 is a section of public adopted highway (Maplebeck Road) over which no powers of compulsory acquisition or temporary use are sought, the land being required for Work No. 8 (access) only. Whilst the solar arrays are in proximity to the farmhouse at Beesthorpe Manor Farm and the proposed Development adjoins the farmland, the farm itself is located outside of the Order land and no land or interest in land is to be acquired. As noted in the representation, Beesthorpe Manor Farmhouse lies beyond the 250m study area for the RVAA provided in ES Volume 4, Appendix 7.6: Residential Visual Amenity Assessment [EN010162/APP/6.4.7.6] [APP-213] and the effects arising from views

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
Marie-Louise Stewart on behalf of Andrew Stewart (Farmers Ltd), The Toward and Stewart Families, Beesthorpe Manor Farm [REP1-120]		
6-9	<i>"The summary of objection submitted in our initial representation of 2/10 identifies that the location of the operational area in parcel 15, and the lack of effective and intervening boundary treatment screening between it and Beesthorpe Manor Farm/Beesthorpe Manor Farmhouse are the main areas of objection to the proposals.</i> <i>Beesthorpe Manor Farmhouse faces due north across mainly open fields and the promontory of operational land that projects eastwards adjoining Beesthorpe Manor Farmland and towards the A616 Ollerton Road is within line of sight. The lack of effective boundary screening and the greater visibility of the protruding field element will increase its visibility and visual prominence.</i> <i>The operational array area will sit within a mainly open agricultural landscape context</i>	of the Proposed Development would not exceed the RVA threshold at this location. The Applicant notes the comments on the potential change to views from Beesthorpe Manor Farm and farmhouse. The Applicant's responses to the concerns raised in your Relevant Representation [RR-129] are set out in the following sections of the Responses to Relevant Representations [EN010162/APP/8.16A], • Table 4-9, <i>Landscape and Visual</i> on page 319 • Table 4-11 <i>Principle of Development</i>, on page 327 • Table 4-13 <i>Socio-economics</i>, on page 339³ Please refer to the row below for clarification to the matters that have been raised.

³ Note: New permissive routes are proposed as part of the Development. The total length of all proposed permissive routes has been updated, resulting in a minor reduction from 32.6 km to 32.2 km. All references to the total length of permissive routes across the Application documents were revised at Deadline 2.

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
Marie-Louise Stewart on behalf of Andrew Stewart (Farmers Ltd), The Toward and Stewart Families, Beesthorpe Manor Farm [REP1-120]		
	<i>where it adjoins Beesthorpe Manor Farm. The density of the panel array (indicated on the applicant's landscape masterplan extract below) and its visibility will give rise to a significantly discordant feature arising from this juxtaposition of open rural landscape and densely sited man-made solar panels. The lack of any significant periphery screening in the proposals, of the land that projects towards the A616 will increase the detrimental visual impact upon the amenity and outlook of Beesthorpe Manor Farm and farmhouse."</i>	
10-13	The applicant's own visual impact assessment material (see below) has focussed upon the impact of the arrays upon Beesthorpe Hall, rather than on Beesthorpe Manor Farm to the north. This analysis taken from submitted material underplays the visual impact from the solar arrays upon Beesthorpe Manor Farm.	The LVIA provided in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] has not particularly focussed on Beesthorpe Hall. The positioning of representative viewpoint 51 close to that property was at the request of NSDC as set out at page 6 of ES Volume 4, Appendix 7.1: Consultation [EN010162/APP/6.4.7.1] [APP-208]), and is not specifically related to the consideration of effects on views from Beesthorpe Hall, which is also outside the 250m RVAA study area as shown by sheet 3 of Figure TA7.6.1 Residential Property Location Plans in ES Volume 4, Appendix 7.6: Residential Visual Amenity Assessment [EN010162/APP/6.4.7.6] [APP-213].

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
Marie-Louise Stewart on behalf of Andrew Stewart (Farmers Ltd), The Toward and Stewart Families, Beesthorpe Manor Farm [REP1-120]		
10-13	Our concerns are the failings in the proposed mitigation screening adjacent to Beesthorpe Manor Farm, and to protect the outlook from Beesthorpe Manor Farm and farmhouse area. These concerns can be addressed by deletion of the protruding operational field in parcel 15 or amendment to the landscaping and screening proposals to provide a decent screened boundary treatment around the operational panel areas in parcel 15 and Beesthorpe Manor Farm.	Mitigation around the areas of solar panels to the northwest of Beesthorpe Manor Farm would consist of allowing existing hedges to increase in height (along with gapping up where required). This may not prevent all visibility of the solar arrays from the property given the gently sloping ground within the nearest field, but would be sufficient mitigation given the distance to the property as discussed in relation to paragraph 5 above.

4.13 RESPONSES TO MICHAEL PICKERING'S WRITTEN RESPONSE

Table 4-11 Responses to Michael Pickering

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Michael Pickering [REP1-121]		
<i>Introduction</i>		
Page 1	I submitted a relevant representation at registration. In that document, I addressed arguments covering the design of field W7 as depicted in the Landscape Masterplan APP-030. I also commented on field W6 in respect of the harm it would cause the setting of a Grade 2 listed building. Other subjects addressed were the loss of BMV land, dangers associated with the BESS and the accuracy or otherwise of the emissions and generation calculations by the Applicant. My position on these matters has not changed. Scheme benefits. Guidance on composing these representations state I should indicate which part of the design I support. In brief, none. Whilst I am supportive of the generation of renewable energy, as a retired farmer who worked these fields for 25 years, I firmly believe that this land should continue to produce food.	The Applicant has provided responses to the setting of a Grade 2 listed building, the loss of BMV land, dangers associated with the BESS and the carbon emission calculation in Table 4-1, 4-3, 4-5 and 4-8 of the Responses to Relevant Representations [EN010162/APP/8.16A]. The Applicant also provided a detailed note on the GHG emissions calculation in Appendix 2 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], on page 57. In relation to the design of Field W7, it is noted that the relevant representation states: <i>"I have previously suggested that Field W7 (as depicted in ES Figure 5.2 Masterplan) be redesigned, moving the panels on the east of W7 down towards the A616 due to it being a lower grade of land."</i> The Applicant reaffirms that the Development has been subject to an iterative design process. This has taken account of the context and features of the land within the Site, nearby sensitive receptors and assets, information from environmental surveys, feedback from stakeholders, and opportunities and constraint. The design of the Development has sought to balance the need to maximise the energy generation capacity of the Development with the avoidance and mitigation of effects, and provision of environmental and other

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Michael Pickering [REP1-121]		
	Field W7: Whilst not repeating my earlier arguments and being aware that the Examining Authority paid a site visit to that area on 5th November 2025, I attach a photograph of winter wheat in field W7 in crop. It looked very different in November 2025.	enhancements, where practicable The Applicant therefore considers the illustrative layout appropriate.
<i>Glint and Glare</i>		
Page 2	I note the conclusions on this matter on page 26 of Technical Appendix A16. 1 Glint and Glare APP -286. I am not qualified to challenge the conclusions. I do however have concerns about potential impacts on the north facing elevation of my house from the nearby south facing panels planned for field W5. I would request that the ExA consider a DCO requirement that should photographic or corroborated witness evidence of a glint and glare impact on our house be forthcoming post construction, then the Applicant (or new operator) at their expense should amend the panel angles to eliminate the impact, or if that is not possible, remove the offending panels. Clearly, this should not be contentious for the	The Applicant has set out a response to the issues raised relating to glint and glare impact at Table 4- 9 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 322. With specific regard to the residential property to the south of Field W5 (referred to as Property 52 in Technical Appendix A16.1 Glint and Glare), no glint and glare effects are anticipated to occur at this location, either from Field W5 or any other solar array area. However, as stated in Section 5.5 of Technical Appendix A16.1, the assessment is inherently subject to some uncertainty; therefore, in the unlikely event that glare effects are found to occur at Property 52 for durations in excess of the assessment criteria set out in Section 4.2.3 of ES Volume 4, Appendix A16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286] , this will be remedied through a method agreed with the Local Authority, based upon the specific details of the problematic glare at the time.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Michael Pickering [REP1-121]		
	Applicant who believe no such impact is possible.	
<i>Health, Safety and Security</i>		
Page 2	CCTV I would fully expect the Applicant to be mindful of the statutory restrictions on CCTV filming and recording onto private land without consent. I mention this as the north east corner of field W6, 10 metres across the road from my private driveway, would seem to be a likely candidate location for a camera. I would seek reassurance that the positioning of any camera in that area would not impact our privacy.	Statutory restrictions on CCTV recording and usage will be adhered to. The CCTV cameras will be focussed inside the fences and not towards private land that the Applicant has no control over. The Concept Design Parameters and Principles [EN010162/APP/7.14B] confirms that • CCTV cameras will be directed towards the Order limits and its immediate environs, or away from residential properties; • CCTV will be pole mounted and/or on nearby structures, 2 – 3.5 m camera height.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Michael Pickering [REP1-121]		
<i>General</i>		
Page 2	Underground Spring. As part of the Statutory Consultation process, I submitted the following: "EG will now be aware of the natural spring originating on the border of fields 96 and 98. This feeds spring water to my property. I would be heavily opposed to any development which compromised this utility feed. I note that it is not mentioned in the PEIR documents so far submitted". The piped spring is now believed to originate in field W7 (as renamed). Whereas it may be possible to carefully excavate the holes for the deer fence poles without damaging that pipe, it may be impossible to pile drive the panel supports without risking damage to that pipe, unless some prior investigation has been completed. I am not aware of any published investigation results. Though this pipe historically discharged into drinking troughs for farm animals, it now discharges into the pond in front of our house. This pond was assessed by the Applicant's appointed consultants with the results summarised in the Technical Appendix A8.7 – Great Crested Newt Baseline APP-220. It is	Mr Pickering and Penelope Ann Pickering are included in the Book of Reference (as updated at Deadline 2) [EN10162/APP/4.3C] under Plot 21/3 in respect of rights relating to a pipe, such rights benefiting their property and being contained within a conveyance dated 13 October 1981. Distinct from the above-mentioned pipe and the associated rights, Mr Pickering refers in his written representation [REP1-121] to a 'piped' underground spring serving his property and the potential for the spring to be damaged during the carrying out of works to construct the proposed Development. Mr Pickering's property is located outside of the Order Land. With regard to existing water distribution infrastructure located within the Order Land, Section A5.3.9.6.3 of the ES Volume 4, Appendix A5.3 Outline Construction Environmental Management Plan [EN010162/APP/6.4.5.3B] has been updated at Deadline 2 to account for the unconfirmed location of a water pipe serving Kneesall Lodge. Paragraph 126 confirms that <i>"If underground utilities are encountered, measures to avoid damage or disruption to the underdrainage system will be implemented, by micro-siting excavations. Where this is not practicable, underground utilities would, in consultation with the landowner, be diverted or replaced."</i>

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Michael Pickering [REP1-121]		
	identified in that report as Pond 116. Though negative for GCN DNA at the time of testing, the HSI survey (undertaken to determine the suitability of this pond to support great crested newts) rated it as 'Excellent'. Fracturing this pipe has the potential to remove this pond as a possible GCN excellent habitat.	Requirement 12 in Schedule 2 to the Draft DCO [EN010162/APP/3.1C], requires a Construction Environmental Management Plan ("CEMP") – per phase of the proposed Development – to be submitted to and approved by the Local Planning Authority, in consultation with the Environmental Agency. Each CEMP is required to be substantially in accordance with the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B]. Each phase of the proposed Development must be carried out in accordance with the CEMP (as approved) for the relevant phase. Accordingly, the requisite controls exist within the Draft DCO [EN010162/APP/3.1C] to manage instances of interaction (if any) between the proposed Development and existing water distribution infrastructure (including the 'piped' underground spring serving Mr Pickering's property) and to mitigate the impacts arising (should any be identified). In the event that the impacts of the Proposed Development are not fully mitigated, affected parties may have an entitlement to compensation arising from interference with existing land rights and/or damage to land caused by the construction or operation of the proposed Development, subject to a qualifying claim being made. Any such claim would be determined in accordance with the body of statute and case law collectively referred to as the 'Compulsory Purchase Compensation Code'.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Michael Pickering [REP1-121]		
<i>Landscape and Visual</i>		
Page 3	Cumulative Sequential Impact Assessment. I am concerned about the above impact. I have 5 main journey routes. To drive to Ollerton or Newark, I will have to drive on the road with panels either side. On the Newark route, there would be further panels visible as I drive on the A616. Visiting Tuxford, I would experience panels at the side of the road for a distance of 1.4 km. I would also have visible panels when visiting Norwell. When travelling to Mansfield, my normal route would be through Kersall and Eakring. Suffice to say I would again experience panelled fields on both sides of the road, near Kersall and Eakring. Basically, my family and I will not be able to go anywhere from our house without driving past panels.	Effects on all of these routes are described and assessed in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] (as part of visual receptor groups C, D E and H, and users of the A616) and illustrated by Figures 7.6 and 7.7 in ES Volume 3, Chapter 7 Landscape and Visual Impact Assessment Figures (Part 1 of 6) [EN010162/APP/6.3.7A] [AS-035]. Visual effects are identified as significant for local road users in visual receptor groups C and D (between Eakring, Caunton and Ossington) as illustrated by Figure 2 in Appendix C to the Responses to ExA's First Written Questions [EN010162/APP/8.22], during construction and early operation, but there would be no significant effects on road users once planting matures as illustrated by Figure 4 in Appendix C to the Responses to ExA's First Written Questions [EN010162/APP/8.22].

4.14 RESPONSES TO NOTTINGHAMSHIRE AREA RAMBLERS'S WRITTEN RESPONSE

Table 4-12 Responses to Nottinghamshire Area Ramblers

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
Nottinghamshire Area Ramblers [REP1-103]		
<i>Public Rights of Way</i>		
Page 1	<i>"In our submission of 1st October 2025 we made a number of comments regarding proposed Rights of Way closures and Diversions. The DCO describes these as permanent changes to the PROW network, which is inconsistent with the temporary nature of the NSIP.</i> <i>The DCO is for a period of 40 years only. We note that the Nottinghamshire County Council submission has questioned the rationale of proposing permanent changes to Rights of Way, only to have to go through a formal process to amend them back to their previous alignment upon decommissioning.</i> <i>We have examined a number of other solar NSIPs as shown below:</i> <i>Fosse Green Energy (North Kesteven) - at Pre-Examination -</i>	The Applicant's response to Q2.1.6 in the Responses to ExA's First Written Questions [EN010162/APP/8.22], at page 22, addresses the matter of permanent changes to the PROW network. Diversions implemented during the operational phase of the development will remain permanently diverted and will constitute the legal PROW, unless and until a mechanism outside the DCO is used by NCC to re-divert them to their original alignment following decommissioning (for example, using its statutory powers provided by section 119 of the Highways Act 1980). Prior to issue of the final DRP, the Applicant will carry out a review of the Public Rights of Way (PROWs) within the Order Limits, in consultation with Nottinghamshire County Council. Should it be deemed that any PROWs would better be re-located, whether back to their pre-Development locations or otherwise, the Applicant will apply for these changes to be made through the required process at that time.

WR Para Ref.	Summary Position of Interested Party	Applicant's Responses
Nottinghamshire Area Ramblers [REP1-103]		
	• <i>Cottam Solar (Lindsey & Bassetlaw) - Decided</i> • <i>Tween Bridge Solar Farm (north of Doncaster) - at Pre-Examination</i> • <i>One Earth Solar (Newark & Sherwood, West Lindsey, and Bassetlaw) - at Examination</i> • <i>Steeple Renewables (Bassetlaw) - at Examination</i> • <i>East Yorkshire Solar Farm - Decided</i> <i>In all the above any closure and / or diversion of PROW are described as "Temporary". We therefore request that Great North Solar adopt the same principles in Schedule 5 of the DCO.</i>	

4.15 RESPONSES TO OSSINGTON SOLAR CONCERNS GROUP'S WRITTEN RESPONSE

Table 4-13 Responses to Ossington Solar Concerns group

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
<i>General</i>		
1-5	The particular conditions of the airfield create a rare habitat that cannot be replicated anywhere in the vicinity and certainly not within the site area of the GNRSP. The developers now call the scheme a Solar and Biodiversity Park and have worked hard at creating an overall scheme where biodiversity is an important element, but it appears that the airfield has been completely overlooked as an amazing habitat both in its own right and due to its position within the zones of impact on the extensive and important Laxton SSSI and next to Ancient Woodland. It is proposed to place the solar panels in a band across the airfield's northern boundary. (see map below). Unfortunately, this is where the land is roughest and where many areas are left uncultivated or as permanent grassland. It is also nearest the Laxton Sykes SSSI and baulks and the Ancient Woodland of North	The Applicant notes the comments on the ecological value of the former Ossington airfield and its proximity to nearby designated sites, including Laxton Sykes SSSI and adjacent ancient woodland. Please refer to the Applicant's responses below under the subheading 'Ecology and Biodiversity'. Recreational use and landscape experience have also been acknowledged. The Applicant has set out a response to this within Table 3-24 <i>Responses to Ossington Residents' Group</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 176. Further responses to this point are set out below.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
	Wood. The animal tracks and visual evidence show how strongly these sites are interlinked, particularly by the bird, hare and fox populations. It is also the area most favoured by walkers because of the distance from the road, the amazing views across the Trent valley and the feeling of peace and serenity where people can relax and restore their mental wellbeing.	
<i>Site Selection</i>		
6	Ossington Solar Concerns group referred to Chapter 4 (Alternatives) of the Applicant's Environmental Statement and made the following comments: Solar panels on the airfield destroy a local cultural heritage asset. Appendices 1 and 2 of the WR's submission include comments from the Airfields of Great Britain Conservation Trust on the importance of World War II airfields to heritage and culture, as well as the Trust's description of the airfield.	The Applicant's response to NCC's LIR, paragraph 5.1.3 (page 10 above), addresses the airfield's historical value.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
	- Solar panels on the airfield are not sensitive to their impact on its importance as a local cultural heritage asset and will entirely destroy the integrity of that asset. - Although Ossington Airfield has no designations it should be encompassed in these areas due to its historic significance on a regional rather than local level. It had battlefield status in the second world war when it was extensively bombed. Some of the last bombs of the war were dropped on and adjacent to the airfield.	
<i>Landscape and Visual</i>		
7	It has a particular character to the Landscape (Due To Its Historic Use as an Airfield) Throughout the GNRSP proposals for the whole area solar panels are generally hidden from close views from the road by the high hawthorn hedges which are a characteristic of the locality. The airfield has no such hedges (one of the features that defines its character), and the view from the road as it approaches or	Ossington airfield has an open and flat nature which is distinct from the surrounding area, however it is not identified as a separate or particularly sensitive character type by any of the relevant baseline character studies (National, Nottingham or NSDC), and that includes at the finest grained assessment level (below character type) where it is identified as part of MN Policy Zone 21 Norwell Woodhouse Village Farmlands with Ancient Woodlands by the Newark and Sherwood Landscape Character Assessment SPD. The recommended management actions for the Policy Zone do not include retaining the

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
	leaves Ossington is of a wide-open space. The road does not cut straight through the middle of the airfield but runs a zigzag course focusing views into the airfield. Solar panels will be visible and very intrusive and damaging to the airfield's distinctive character	openness or particular character of Ossington airfield. Given this, the introduction of hedging would form a neutral or positive change in terms of character given that it would bring the character of the airfield closer to that of the rest of its policy zone, character type and character area. The lack of hedging within the airfield at present would lead to Large scale changes to views from the road through the airfield and to significant effects during construction and early operation as set out in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] as part of visual receptor group D) and illustrated by Figure 7.6 Visual Receptors before Mitigation in ES Volume 3, Chapter 7 Landscape and Visual Impact Assessment Figures (Part 1 of 6) [EN010162/APP/6.3.7A] [AS-035]. The increased enclosure of the currently open views by hedges once mitigation planting matures is also noted as giving rise to Medium scale changes to views as set out paragraph 243 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] as part of visual receptor group D) and illustrated by Figure 7.7 Visual Receptors after Mitigation in ES Volume 3, Chapter 7 Landscape and Visual Impact Assessment Figures (Part 1 of 6) [EN010162/APP/6.3.7A] [AS-035].

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
<i>Ecology and Biodiversity</i>		
7-10	It is an important wildlife site and unusual natural environment. The airfield is an important local wildlife site - both in its own right and its importance to Laxton SSSI. Natural England's classification of Network Zones in relation to key sites such as SSSIs and Ancient Woodlands is one of their key principles to protect biodiversity. 1. The lapwings particularly are found near the western section of the airfield. They nest in the southern field but the birds are more often found flying over the northern section particularly the central northern and north western parts. The proposed solar panels significantly reduce the area of open space which is so essential to the lapwing; threatening their existence. 2. The installation of solar panels at Ossington Airfield in Nottinghamshire has raised concerns regarding potential detrimental effects on local wildlife. While specific studies on Ossington Airfield are limited, general research indicates several ways in which solar farms can impact wildlife,	A range of baseline studies has been undertaken to establish the status and distribution of notable and protected habitats, species and designated sites, including lapwing and Laxton Sykes SSSI, in the area around Ossington airfield and all other parts of the Order Limits and these are presented in ES Volume 4, Appendix A8.1–12 [EN010162/APP/6.4.8.1–12]. The potential effects on these features, including from habitat alteration, disturbance, barrier effects and collision, are assessed in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A]. The assessment concludes that with appropriate mitigation measures which are secured, the Development would have no significant adverse effects. ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B] includes a range of beneficial interventions in and around Ossington including the creation of new woodland, wood pasture and open space.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
	particularly when established on former airfields. Potential Impacts on Wildlife: a) Habitat Alteration: Airfields often consist of open grasslands that serve as habitats for various species. The construction of solar panels can lead to habitat loss or modification, potentially displacing resident wildlife. b) Disturbance During Construction and Maintenance: The development and upkeep of solar farms fauna can cause disturbances, such as noise and increased human activity, which may disrupt local. c) Barrier Effects: Large expanses of solar panels can act as barriers, hindering the movement of terrestrial animals and fragmenting habitats. d) Although there is no significant evidence of bird casualties due to solar panels, the risk of collisions cannot be entirely dismissed, especially if the panels create glare that could disorient flying birds. 3. It is unlikely that sensitive and vulnerable birds such as the lapwings and skylarks will remain on site or return after work is complete due to the extent of the noise and disruption bringing materials and during the erection of the fences, the solar panels etc. 4 The airfield has a close	

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
	relationship with Laxton SSSI. Although the latter SSSI is based on its habitat, that habitat supports a large number of animals including red and muntjac deer, hares and foxes. The feeding grounds of many of the birds on the Laxton Sykes extend up to and over the airfield. It is a frequent occurrence to see the large flocks of linnets and starlings, crows and other smaller birds fly over Knapeney Farm and onto the airfield. Evidence submitted by Natural England stated that more than 25 per cent of SSSIs are affected by off-site pressures 5. The positioning of the solar panels disrupts the hunting grounds of the barn owls quarter of the land and on round the back of Knapeney Farm and on to the eastern end of the airfield.	
	In regard to the Applicant's Project-Specific Design Principles, the Interested Party provided the following responses: Solar panels on the airfield do not enhance but diminish the ability for recreation to improve health by taking away that quality of peace given by openness in the natural environment that users of the airfield currently enjoy. There is a proposed new	The Applicant notes the concerns raised by and on behalf of Ossington Solar Concerns Group in relation to works affecting the former airfield site of RAF Ossington – in particular, the resultant loss of the site as a valued leisure and recreational resource by the local community. The former Ossington Airfield is private land which is currently in agricultural use. The Applicant has concluded an option agreement (dated 1 July 2024) with the freehold owner of the former Ossington Airfield (see entry 15 of the Land and Rights Negotiations Tracker

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
	permissive route way crossing the airfield but this will have none of the particular qualities which make the existing place so special • Solar panels on the airfield destroy the ability to understand and appreciate this very significant local cultural asset by taking away the integrity of the landscape and structures • Solar panels on the airfield show that the GNRSP has not been designed to take account of local character. The panels do not enhance but destroy the particular local character of the airfield landscape. • The FRIENDS OF OSSINGTON AIRFIELD GROUP Facebook page is really popular and users of the airfield constantly comment on the unique importance of the airfield's surroundings with regards to their mental health and wellbeing. We ask that DB030 is removed from the solar panel proposals. The runway system, all the built structures and features (landing lights and arrester gear workings), the character and	[EN010162/APP/4.4B]) and there are no statutory restrictions on the disposal or acquisition of the land subject of the option. Ms Janet Carr on behalf of Ossington Solar Concerns Group states in the written summary of her oral submissions at the open floor hearing [REP1-134] that farming takes place at the former Ossington Airfield and that members of the public respectfully defer to this use. It is acknowledged by Ms Carr that any use by the public of the site for leisure and in recreational pursuits, such as walking, running, dog walking, bird watching etc., is 'unofficial' and entirely 'informal' in nature. There is no right for the public to use the land for the aforesaid activities. Accordingly, there is no weight to be placed on the unofficial use by the local community of the former Ossington Airfield. The Applicant is proposing a new permissive path through the former Ossington Airfield – New Permissive Footpath 8, the route of which is shown on the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A].

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns group [REP1-135]		
	atmosphere of the airfield would remain intact and unspoilt. The birds, bats and other animals and plants would remain undisturbed. The lapwings and skylarks, both endangered species and so vulnerable to the loss of open space and to the major disturbance caused during construction, would remain.	

4.16 RESPONSES TO RT HON ROBERT JENRICK MP'S WRITTEN RESPONSE

Table 4-14 Responses to Rt Hon Robert Jenrick MP

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
<i>Principle of Development</i>		
Para 1	<i>"I want to make clear at the outset that I am not opposed to solar power in principle. I have said publicly that Members of Parliament should support the expansion of rooftop and</i>	Please refer to Table 3-27 of Responses to Relevant Representations [EN010162/APP/8.16A] , pages 217 to 225, which sets out the Applicant's response to this matter.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
	<i>brownfield solar and work constructively to mitigate the worst impacts of large schemes”.</i>	To add to that response, rooftop and brownfield solar options are considered by the Government to be insufficient in scale, pace and at a viable cost to meet national targets. Government policy is clear on the need for significant amounts of new <u>large scale</u> energy infrastructure and that the need for such infrastructure is urgent. This is set out in detail in the Statement of Need (Planning Need) [EN010162/APP/7.2] [APP-324] and has been recently reinforced through the publication of the updated NPSs for energy in January 2026. The Applicant welcomes the commitment to a constructive approach to mitigating impacts of large scale schemes.
Para 1	<i>However, the scale, siting and cumulative effects of the proposed Great North Road Solar Farm are wholly unacceptable for Newark, for the Trent Valley corridor, and for the central belt of rural Nottinghamshire. The development would cause harm on a scale that far outweighs any claimed benefits.</i>	Please refer to Table 3-27 of Responses to Relevant Representations [EN010162/APP/8.16A], t which provided the Applicant's response to this matter. The Applicant respectfully disagrees with this position. As demonstrated in the Planning Statement [EN010162/APP/5.4B] although the Development would result in some significant adverse effects there would be no conflict with the relevant national and local policies. When taken as a whole the substantial benefits of the Development, which is CNP infrastructure, are overwhelmingly greater than the residual adverse effects.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
Para 1	<i>Since the outset of the proposals, I have met with constituents across the affected area and studied the details of the application. In all of my surveys, constituency visits and public meetings, I have found that the overwhelming majority of residents – and in fact almost everyone I have spoken to – are opposed to this proposal. They are deeply concerned that their villages, farmland, and way of life will be overwhelmed by what is effectively the construction of an industrial energy complex across a historic and sensitive rural landscape.</i>	Please refer to Table 3-27 of Responses to Relevant Representations [EN010162/APP/8.16A] which provided the Applicant's response to this matter To reiterate, the Applicant takes community consultation seriously as demonstrated in the Consultation Report [EN010162/APP/5.1] [APP-296]. We recognise that there are objections to the principle of the Development this is not unanimous. demonstrated in the Consultation Report over 40% of respondents to Phase 1 consultation expressed either unqualified or qualified (i.e. subject to changes) for the Development. We are committed to working collaboratively with local people and organisations to deliver the Development sensitively and in cohesion with the local environment.
	<i>The proposal is extremely large - in fact, if approved this would be one of the largest solar farms in Europe. The applicant seeks to construct a solar and battery energy storage scheme covering around 2,900 hectares (some 7,000 acres) of agricultural land to the north-west of Newark, with approximately 1,372 hectares used for solar development. It would form a ring of industrial development roughly 6 miles from north to south around the villages of Bathley, Caunton and Norwell, with the eastern</i>	These comments are noted, though as a point of record the correct size of the site is 1,765 hectares (rather than 2,900). This is a large scheme and at a capacity of 800MW will provide a significant volume of renewable electricity generation with the ability to export this generation to the electricity grid (in accordance with the secured grid connection contract. This would generate more than enough energy for the entirety of Nottinghamshire's domestic population. It does so without giving rise an any potential adverse effects that, considered individually, cumulatively or as a whole, are so severe that the decision maker should refuse the application and, moreover, that each aspect of

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
	<i>section running alongside the A1 near Cromwell and North Muskham. The land affected crosses multiple parish areas and lies very close to numerous villages and individual homes. When viewed in isolation this is already a major and inappropriate scheme, but when considered alongside other nationally significant infrastructure projects, including the One Earth Solar Farm and the Steeple Renewables proposal, the cumulative impact on Newark and rural Nottinghamshire is severe.</i>	the proposals is acceptable in planning terms when considered against the relevant national and local policies. Please refer to Table 3-27 of Responses to Relevant Representations [EN010162/APP/8.16A], page 218 to 219, provides the Applicant's response in relation to the matters raised in relation to cumulative effects.
<i>Land Use</i>		
	<i>The land in question includes extensive tracts of Best and Most Versatile (BMV) agricultural land. National Policy Statement EN-3 is explicit that where solar farms are proposed on agricultural land, poorer quality land should be preferred, and the use of BMV land – Grades 1, 2 and 3a – should be avoided wherever possible. At this scale, the loss of BMV land is inevitable, undermining food security at a time when the importance of protecting domestic food production could not be clearer.</i>	Please refer to Table 3-27 <i>Responses to Robert Jenrick MP of Responses to Relevant Representations [EN010162/APP/8.16A]</i>, on page 220, which provided the Applicant's response to this matter

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
Environmental impact		
<i>The environmental impact of this scheme in particular is profoundly concerning. The land sits within the mapped zones of Nottinghamshire's Local Nature Recovery Strategy (LNRS) - a statutory strategy under the Environment Act 2021 which identifies the areas of greatest ecological value, sensitivity and restoration priority.</i> <i>Much of the proposed development area overlaps or lies adjacent to:</i> <i>• areas of ancient woodland</i> <i>• ancient tree inventory sites</i> <i>• Local Wildlife Sites including Muskham Wood, Cheveral Wood, Hagleys Plantation, Laxton Wood, Norwell Meadows, Ossington Lake and Besthorpe Gravel Pits</i>	The Environment Act 2021 mandated the preparation of LNRSs across England. As noted in NPS EN-1 (para 4.6.14) “they are a new system of spatial strategies for nature recovery and will play a major role in providing detail on the best locations to create, enhance and restore nature and deliver wider environmental benefits. LNRSs will also agree priorities for nature recovery and map the most valuable existing areas for nature. They will be critical in delivering government targets for species abundance and habitat creation commitments, as well as other pressing environmental outcomes for water and flood risk, carbon and tree planting and woodland creations. LNRSs will also drive the creation of a Nature Recovery Network (NRN), a major commitment in the government's Environmental Improvement Plan”. The Nottinghamshire and Nottingham LNRS was published on 10 November 2025 following public consultation between 6th May and 16th June 2025 (shortly before the submission of the DCO application on 27 June 2025). The final LNRS was not therefore published at the time of submission though application documents made reference to the emerging draft (for example Chapter 8 of the ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] which	

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
	• <i>Sites of Special Scientific Interest (SSSIs) including Besthorpe Meadows and Eakring and Maplebeck Meadows</i> • <i>mapped “areas of particular importance for biodiversity”, wetland measures, watercourse measures, and areas the LNRS identifies as having the potential to become priority habitats</i> <i>The applicant's documents do not reference the LNRS at all, despite its statutory role and clear relevance. This omission is significant. The LNRS partnership – including Nottinghamshire County Council, Natural England, the NFU, local universities and the Environment Agency – is explicit that damaging land-use change, particularly for “energy generation (e.g. solar farms)”, must be avoided in sensitive areas. The Great North Road proposal is in direct conflict with the strategy, policies and objectives of the LNRS.</i>	notes that through the Outline LEMP and BNG, the Development will protect a large area from loss of or damage to important biodiversity values through long-term ownership or long-term management agreements contributing to local policies such as the emerging LNRS. The Draft Local Nature Recovery Strategy (LNRS) has also informed (and is cited in) ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A]. The Development is currently exempt from mandatory Biodiversity Net Gain (BNG) but it is anticipated that it will exceed the minimum 10% gain required by law for other types of development. Nottinghamshire County Council has set 20% net gain as an aspirational target, but the County Council and Newark and Sherwood District Council both require only 10% as the minimum gain. Section A5.1.3.2 in ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1B] explains how the final LNRS will be considered in the final designs The Nottinghamshire and Nottingham LNRS Statement of Biodiversity Priorities notes the anticipated future pressures on nature in Nottinghamshire including loss of habitat due to change in land use including for energy production including solar farms and renewable energy. On page 48 the document notes that energy generation (e.g. solar farms) as a competing land use pressure alongside food production, woodland creation (including carbon offsetting), off site BNG and development for housing, employment, infrastructure and recreation. The document then states (on page 48) that “<i>proper planning, e.g.</i>

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
		<i>through a national land-use strategy is required, but the LNRS has a role to play in identifying both the most important existing places for wildlife (where damaging land-use changes must be avoided), and in identifying the places of greatest importance for delivering nature recovery". The document does not state that energy generation is a particularly damaging land use and the same paragraph continues, to note that "competing land-uses are not necessarily mutually exclusive, for example areas created for habitat could still be used for food production through the use of livestock for conservation grazing, and similarly the co-location of solar farms, grazing and habitat creation". On page 36 the document expands on this point noting that "whilst a very noticeable development is the increasing number of large solar arrays in the Nottinghamshire countryside... areas of grassland amongst the rows of photovoltaic panels are spared from intensive management and could prove to be beneficial to some farmland species".</i> The LNRS clearly, therefore, recognises the role of renewable energy generation as a land use to be managed alongside other priorities and uses. In this regard the Development is consistent with the LNRS in providing extensive conservation grazing, retained (ecologically enhanced) arable farming, and habitat creation. The LNRS includes a Local Habitat Map which identifies i) Areas of Particular Importance for Biodiversity (APIBs) and ii) Mapped measures and areas that could become APIBs (ACBs).

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
		The APIBs include Special Areas of Conservation (SAC), National Nature Reserve (NNR), SSSIs, LNRs, LWSs, Ancient Tree Inventory (ATI), Ancient Woodland, Lowland Fen and Sherwood Forest KBA. All of these features as mapped in the LNRS on the Local Habitat Map were identified and taken into consideration in the evolution of the Development design and the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] such that adverse effects on them will be avoided. The Applicant notes that the Order limits do not include any ancient woodland, or ancient trees. The Applicant has also confirmed that the Development would have no impact on either of these designations. As stated in paragraph 369 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A], many of the most beneficial effects of the Development are generalised and are not readily reflected in the EIA process or BNG metric. These effects include landscape connectivity for wildlife, buffering and connecting valuable retained habitats (e.g., ecotones around ancient woodlands), the creation of riparian corridors, and the active management of some LWS. Such measures make a substantial and meaningful contribution to biodiversity and to local and national policies, particularly LBAPs and the measures and priorities specified in the Local Nature Recovery Strategy.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
<i>Landscape and Visual</i>		
<i>The impact on the historic pattern of settlement and landscape would be profound. Entire villages and individual homes would be encircled by panels, cabling and ancillary infrastructure; their setting permanently altered; and opportunities for natural, organic growth constrained for decades. This part of Nottinghamshire is a rural, historic landscape of rolling farmland, ancient woodlands, medieval field systems and designated wildlife sites. To industrialise it on this scale would be to impose lasting harm on its character and on the amenity of residents.</i>	Table 4-9 Landscape and Visual of the Responses to Relevant Representations [EN010162/APP/8.16A], 317 to 320 sets out the Applicant's responses to the landscape and visual impacts and residential amenity. With respect the Applicant disagrees that "<i>the impact on the historic pattern of settlement and landscape would be profound</i>". Of the 7 LCAs, only one (Mid Nottinghamshire Farmlands/Village Farmlands with Ancient Woodlands) is assessed to receive a Major/Moderate and Adverse and Significant effect. The remaining LCAs, even those which include development, are not judged to receive significant effects, despite some of those effects being Moderate and adverse. The effects on landscape character identified in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] is a matter of agreement with NSDC, as stated by by NSDC in the LIR at paragraph 8.21 to 8.22 The Applicant also disagrees with the statement that "<i>entire villages and individual homes would be encircled by the Development</i>". A response is provided in Table 3-6 of the Responses to CPRE Nottinghamshire (page 41), which states: "<i>Whilst on plan, some settlements may appear to be 'surrounded', the design is set back from villages where proximity would lead to open and close views (see Table 7.3 in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]) and takes</i>	

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
		<i>advantage of natural screening by terrain and vegetation. As a result significant effects on settlements would be avoided as confirmed by the assessment as summarised in Tables 7.6 and 7.7 in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]."</i> Regarding permanent harm to landscape character, it should be noted that, after decommissioning of the Development, there are not likely to be any significant effects on character areas or other visual receptors. Section 7.3 of the Planning Statement [EN010162/APP/5.4B] further explains: • NPS EN-1 states at paragraph 5.10.5 that "Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation". • It is clear that the site selection and the landscape strategy have sought to minimise harm to the landscape and the design of the Development has evolved as part of an iterative process in response to the baseline landscape and visual findings and subsequent studies. Once proposed planting is established, the number of receptors with significant effects is reduced. • A comprehensive series of mitigation measures has been embedded in the design of the Development, with the aim of

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
		reducing adverse effects resulting from its introduction. The mitigation measures include significant landscape enhancements, tree planting and new PROW. • Paragraph 5.10.14 of NPS EN-1 states that “The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.” • The significant national and local benefits of the Development are considered to outweigh the limited number of localised visual effects. Therefore, it is policy compliant with NPS EN-1. 7.3.14 In addition, NPS EN-1 is clear that substantial weight should be given to the need for the types of infrastructure covered by this NPS (paragraph 3.2.7) and that this need is urgent (paragraph 3.2.6). 7.3.15 Given the level and urgency of this need, paragraph 4.1.3 of NPS EN-1 states that the SoS should “start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the NPSs clearly indicate that consent should be refused”. In this case, there are no such policies which clearly indicate that consent should be refused. Accordingly, the presumption in favour applies and consent should be granted for the Development.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
	This landscape contains historic farmsteads, medieval settlement patterns, listed buildings and known archaeological sites. The imposition of industrial-scale energy infrastructure risks permanent harm to the setting of heritage assets and the loss of undiscovered archaeology that forms part of the region's history. Constituents rightly fear that a development of this magnitude would damage their historic environment irreparably.	Please refer to <i>Table 4-3 Cultural Heritage and Archaeology of Responses to Relevant Representations [EN010162/APP/8.16A]</i> , page 283 to 284, provides the Applicant's response in relation to the matters raised in relation to the impact on the historic environment.
<i>Traffic and Access</i>		
	Construction and traffic impacts are another major concern. EN-3 acknowledges that access and traffic during the building of such large schemes can be a significant consideration in rural areas. The local road network through Norwell, Caunton, Maplebeck, Kersall and Laxton is not suited to prolonged volumes of heavy goods vehicles. Residents are worried about disruption, safety risks, and the transformation of quiet country lanes into continuous construction haul routes. Even if the scheme were acceptable in other respects,	The Applicant has set out a response to the raised the Relevant Representation regarding construction traffic within Table 3-27 <i>Responses to Robert Jenrick MP</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 221.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
	robust caps, routing restrictions and independent monitoring would be essential.	
<i>BESS</i>		
	The proposal includes a very large battery energy storage system (BESS). Serious fire incidents involving lithium-ion systems have occurred both in the UK and internationally. These demonstrate the real risks of fire, explosion and toxic plumes, and show how difficult such incidents are to suppress once ignited. Constituents have pressed me on this repeatedly, and these concerns must be taken seriously.	Please refer to Table 3-27 of Responses to Relevant Representations [EN010162/APP/8.16A] which provided the Applicant's response to this matter, at page 221 – 222.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
<i>General</i>		
	There is a further democratic deficit in how this project is perceived. Residents across Norwell, Ossington, Maplebeck, Laxton, Caunton, Kersall and Sutton-on-Trent feel ignored and powerless as decisions about the future of their villages are taken over their heads. They fear, with justification, that they will be forced to live inside an industrial complex for a generation. Local surveys, parish reports and attendance at public meetings show near-universal opposition to the proposal, and that reflects what I have consistently heard on the ground.	Please refer to Table 3-27 of Responses to Relevant Representations [EN010162/APP/8.16A] which provided the Applicant's response to this matter at page 223. To add to that response, any person with an interest in the Development can also participate through the Examination process and the Applicant is reviewing and responding to matters raised through this process.
	Government policy is clear that solar development should prioritise rooftops, brownfield sites, contaminated land and other industrial surfaces. Newark and the wider region have substantial warehouse and logistics capacity with large commercial roofs that could and should be utilised before sacrificing prime farmland and sensitive habitats. I have consistently made that case	Please refer to Table 3-27 of Responses to Relevant Representations [EN010162/APP/8.16A] which provided the Applicant's response to this matter at page 224 – 225. To add further with specific regard to the full scope of the policy referred to – the comment in part reflects paragraph 2.20.21 of NPs EN-3 it omits the necessary qualification that land type should not be a predominating factor in determining the suitability of site location for solar. Government policy is very clear that <i>“the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use</i>

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
	locally, and my constituents are right to expect the same logic to apply here.	<i>of previously developed land for renewable technology developments)</i> " (paragraph 2.3.9 of NPS EN-3).
	For all of these reasons, I urge the Examining Authority to accept this representation into the Examination and to give very substantial weight to the loss of BMV agricultural land, the conflict with the Nottinghamshire Local Nature Recovery Strategy, the cumulative impacts with other energy schemes, the permanent harm to village settings and landscape, the unacceptable construction impacts, the significant biodiversity and habitat risks, and the safety concerns posed by the battery storage system	The Planning Statement [EN010162/APP/5.4B] addresses the planning balance and the weight that should be given to residual adverse effects arising from the Development. The substantial benefits of the Development, including the urgent need which the recently updated NPS EN-1 is clear should be given 'substantial weight' substantially outweigh the residual adverse effects. Taking each of the specific points in turn: - The inclusion of some BMV land within the Development is justified and the impacts on BMV land have been reduced by the nature of the Development and its design. As concluded in the Planning Statement [EN010162/APP/5.4B] (section 6.8) The Development is therefore not considered to have a material impact on the overall supply of BMV land in the District and would not have a material impact on food security.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
		- For the reasons set out above we do not agree with the assertion that the Development would conflict with the LNRS - The Environmental Statement has considered the potential for cumulative effects to the extent that this is necessary for the Development. As explained in Appendix 3 to the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], an assessment of combined effects with all development within 20km would mostly describe effects arising from those other projects, not the effects of the Proposed Development, and as such is not pertinent to the consideration of the merits of the Proposed Development. - Government policy recognises that virtually all nationally significant infrastructure projects will have landscape and visual effects. The Development is however sensitive to its location the design has effectively minimised landscape and visual effects, resulting in relatively few significant residual effects being identified; - For the reasons set out in Section 6.14 of the Planning Statement [EN010162/APP/5.4B], through the implementation of measures secured through the outline CEMP and outline Travel Plan construction impacts would not be expected to be significant

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
		For these reasons we respectfully disagree that these matters should be given 'very substantial weight' in the ExA's consideration.
	I ask you to recommend refusal. If, notwithstanding these objections, you are minded to recommend approval, then the only way to protect my constituents would be through stringent and binding requirements. These would need to include independently verified soil surveys to minimise BMV loss; strict protections for LNRS-designated habitats and all Local Wildlife Sites and SSSIs; enforceable construction traffic caps and routing conditions; strong protections against glint, glare and loss of amenity for residents; comprehensive BESS safety and emergency response plans; robust decommissioning and soil restoration obligations; and a meaningful	Please refer to the Applicant's responses above.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Rt Hon Robert Jenrick MP [REP1-127]		
	community benefit package proportionate to the scale of the intrusion.	

4.17 RESPONSES TO WESTON PARISH COUNCIL'S WRITTEN RESPONSE

Table 4-15 Responses to Weston Parish Council

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Weston Parish Council [REP1-079]		
<i>Landscape and Visual</i>		
Page 1	Has the flood risk assessment taken into account the impact of increased surface water runoff from the Solar Park into Moorhouse Beck on the fields either side of Great North Road and Bell Lane after heavy rainfall. The	ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039] has considered the potential risk of flooding in Moorhouse Beck. Please refer to the Applicant's responses on this matter within Table 3-15 <i>Responses to Laxton and</i>

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Weston Parish Council [REP1-079]		
	fields, Great North Road and Bell Lane areas flood on a regular basis after heavy rainfall.	Moorhouse Solar Concerns Responses to Relevant Representations [EN010162/APP/8.16A] , on page 116.
<i>Traffic and Access</i>		
Page 1	Are the two bridges crossing the A1 designed to carry the proposed loads anticipated (accessed from Wadnal Lane and Ladywood Lane) from all the construction traffic without any strengthening works	The Applicant has set out a response to issues raised relating to the construction traffic within Table 4-14 <i>Traffic and Access</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 341. It summarises that the construction routes and access points have been designed to avoid any disruption to the local road network where possible. Section A5.2.6.2 of the ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2B] secures traffic management for all abnormal load movements. As such, any issue arise with structures on the bridges will be managed by the measures set out within the CTMP.
Page 1	There are two proposed access routes to the Solar Park within the Weston Parish boundaries, Wadnal Lane and Ladywood Lane. Both are very close to 60 mph bends. Consideration should be given to reducing the speeds around these two locations to allow construction vehicles to safely turn into and exit from the access roads. One access road has a bridleway and both have pedestrian access along some or all of the route. These footpaths	The Applicant notes the comments on the traffic management measures and the concerns on the non-motorised users, particularly along Wadnal Lane and Ladywood Lane. The Applicant has set out a response to issues raised relating to the construction traffic within Table 4-14 <i>Traffic and Access</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 345.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Weston Parish Council [REP1-079]		
	are used on a regular basis throughout the year.	
	The only bridleway out of the village is along Wadnall Lane - This needs to remain open during the construction works or a suitable alternative found as at least 5 riders use this several times a week. Also, how will heavy construction traffic be made aware of horses crossing and riding around the area. Also, this bridleway would benefit with improvement and signage after the works have been completed.	The Applicant has set out a response to issues raised relating to the road users within Table 3-3 <i>British Horse Society</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 17.
	Following the completion of the traffic survey produced as part of the planning application process by the traveller site and the recent three serious accidents on Great North Road, it is clear that an increase in traffic of any number raises the risk of an accident to drivers and pedestrians that cross at the junction of Wadnall Lane. We must have a temporary and possibly permanent speed reduction to 40mph between the village gateway points on Great North Road.	As set out in paragraph 130 of ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A] a '<i>review of personal injury collision (PIC) data has been undertaken for all construction phase traffic routes within the study area. The review of the collision records has been undertaken to identify patterns of collision types that may be attributed to issues arising from the existing road design or layout and identify any trends that could be exacerbated by Development related traffic</i>'. Data was obtained from Nottingham County Council for the most recent full 3-year period, 01 January 2022 to 31 December 2024, which allows consideration of comparable post-COVID19 data. A review of current road safety has been undertaken in paragraph 14.5.8. This concluded that there is no pre-existing pattern of collisions

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Weston Parish Council [REP1-079]		
		which would be exacerbated by the increase in traffic caused by the Development. During construction, additional traffic will be present on the network, but this represents a relatively small percentage of the total volume of traffic already present on the overall network, although this percentage is larger in areas of low baseline traffic levels. Traffic associated with the construction of the Development will result in no more than a marginal increase in the risk of collisions. Following the completion of the Development, traffic levels will reduce to extant levels and will therefore not influence any change in safety levels.
<i>Ecology and Biodiversity</i>		
	What provisions will be put in place to preserve wildlife in the area during and after construction. The countryside around Weston has many different species of wildlife - Badgers, Foxes, Deer, Bats, Game birds, native and visiting birds, Birds of prey.	The Applicant has set out a response to issues raised relating to the effects of protected species from the Development at Table 4-2 <i>Ecology and Biodiversity</i> of Responses to Relevant Representations [EN010162/APP/8.16A], on page 278.
	The villages hedges are in a poor state generally. Many have been lost due to attack by ivy etc. and finances have prohibited the reinstatement of hedges along footpaths and fields. Further disruption will also affect these hedges and ruin our wildlife and nesting birds	The Applicant will maintain the vegetation in accordance with ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B]. The Applicant has set out a response to issues raised relating to the habitat management at Table 4-2 <i>Ecology and Biodiversity</i> of Responses to Relevant Representations [EN010162/APP/8.16A], on page 281.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Weston Parish Council [REP1-079]		
	and our biodiversity. The reinstatement of affected hedges is essential and support to landowners, including myself, for the repair of existing hedges would be of benefit and mitigate the impact on us all	
<i>Health, Safety and Security</i>		
	Will there be adequate provision for Fire Service access to the areas around Weston in the event of a fire.	The Applicant has set out a response to issues raised relating to the fire safety management within Table 4-1 <i>BESS</i> of Responses to Relevant Representations [EN010162/APP/8.16A] , on page 271.

4.18 RESPONSES TO AMANDA BIRD'S WRITTEN RESPONSE

Table 4-16 Responses to Amanda Bird

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP1-105]		
<i>Principle of Development</i>		
	I would like to question the number of homes that Elements Green state that they can supply as Cleve Hill Solar Park has over 550,000 solar panels yet can only supply up to 102,000 homes and on a sunny November day could only manage 20,000 homes. Kent is one of the sunniest places in the UK and receives a significant amount more sunshine than Nottinghamshire. Nottingham averages 1490 hours of sunshine compared with Kent which is 1846 hours a year. My fear is that the reason they have positioned the solar panels this way is that after installation they will put a further application in for more development due to space on the grid. This is part of the reason that the boundary area is so large.	The Applicant has provided a technical note to clarify the statement that the Development would that the Development would generate annually an amount of electrical energy equivalent to the electrical consumption of approximately 400,000 homes. This is presented at Appendix 1 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. It should be noted that that the number of homes equivalent is used in communication with the public in order to put the generation capacity of a solar farm into a context that is more relatable to people not familiar with MegaWatt-hours (MWh). The design evolution of the Development has been discussed and is summarised in Section 1.4 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. In summary, the site selection and design evolution was an iterative process informed by policy criteria, and following extensive consultation. The size and location of the Development have been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP1-105]		
<i>General</i>		
	I believe that solar and Lithium batteries are the biggest risk. There is a butterfly effect happening. ... We are contributing to the loss of forest so the more that we rely on others the more damage we are causing on Climate Change. The process of producing these solar panels, transporting etc will cause a great deal of CO2 and between a third and half will stay in the atmosphere for 1000's of years. The other half will be absorbed by trees and the ocean but this figure will decrease as we remove the ability for trees etc to absorb their portion of CO2. Solar is a back up not a reliable source of energy and the government itself state that hospitals and schools etc are saving money through rooftop solar.	The Applicant has set out a response to issues raised relating to the fire safety management within Table 4-1 <i>BESS</i> of Responses to Relevant Representations [EN010162/APP/8.16A], on page 271. Table 4-11 Principle of Development of Responses to Relevant Representations [EN010162/APP/8.16A], on page 329, then provides the Applicant's responses to the need for development.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP1-105]	After a conversation at Phase 2 consultation, I was told that I had nothing to worry about and my house would be safer than most due to nowhere for the vibrations to go and therefore no Structural damage. 3 builders later and my house is 100 % at risk of structural damage. My insurers have advised that I need a structural survey prior to works starting to strengthen my case that it is not wear and tear. My house could more than likely become unmortgageable, and I will be in a predicament of not being able to afford to stay but also can not afford to leave	Section 12.4.6 of ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055] considers construction traffic vibration. It notes that Vibration from traffic can be transmitted through the ground by the interaction of the vehicle tyres and the road surface. The passage of vehicles over irregularities in the road can create locally increased levels of vibration. Section A5.2.7.11 of TA A5.2, ES Volume 4, Appendix A5.2: Outline CTMP [EN010162/APP/6.4.5.2B] provides measures that ensure the delivery route is maintained and improved before, during and after the construction period, ensuring vibration from traffic will be minimised as far as practicable. On this basis no traffic induced vibration is anticipated, and as such, effects have not been considered further. It is also notable that existing routes will already experience HGV movements, so the maximum vibration levels at any designated heritage assets or other premises will be no greater than they are now, although would be more frequent. In the unlikely event that the construction of the proposed development causes damage to property, compensation may be payable for the depreciation in value of land caused by works which are authorised by the DCO. This is known as injurious affection compensation and any such claim will be assessed in accordance with the body of statute and case law collectively referred to as the 'Compulsory Purchase Compensation Code'.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP1-105]		
Traffic and Access		
	The HGV traffic will increase by over 1000%, traffic lights down the road meaning what may have taken 2 minutes to get down the road will now be between 10- 15 mins. I am going to have difficulty just leaving my house as I need to pull out into the road to see traffic coming from the right. We also run a business from home and delivery or collection of items in large lorries means other large vehicles struggle to get past, 2 HGV's going in opposite directions will not work	The Applicant has set out a response to the raised in the Relevant Representation regarding construction traffic within Table 4-14 Traffic and Access of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 341. As set out in Section 14.7.1 of the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14A] , although many rural links in the network experience high percentage changes in traffic flows during the construction phase, these changes originate from a low baseline and will not result in significant effect on the local road network. Vehicle movement during the operational and decommission phase would be minimal, and the surrounding road network would not be adversely effected by construction traffic access. The comment outlines that traffic lights on their road will contribute to notable delays in their journey time. The use of traffic lights on Moorhouse Road are only proposed during the construction of the passing places, to allow a safe working distance. Traffic lights will only be used, if needed, for a few days, as each passing place is constructed and would be removed following their installation.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird	[REP1-105]	
<i>Flood Risk</i>		
	The passing places will also cause an increase in flooding due to debris collecting around the entrance to the duct where water will then overflow on to the road and into my garden because we sit in a dip. I would like Elements green to be required to reimburse any homeowner that has expenses that they wouldn't have paid if this project did not go ahead. I would also like Elements green to foot the bill for any damage etc caused by an increase in flooding that has directly come from the panels or works they have completed in order for this project to go ahead,	As set out in paragraph 63 of ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] 'Should debris be spread on to the site access or public road adjacent to the Development, then road sweepers will be quickly utilised to clean affected areas. Loose debris will also be periodically removed from site tracks'. Section A5.6.9.3 then commits the Undertaker to a Water Infrastructure Watching Brief.
<i>BESS and EV Chargers</i>		
	There are no British Standards with BESS sites or EV Charges.	ES Volume 4, Appendix A5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] [REP1-032] has been prepared in accordance with the reference documents listed in Section A5.4.1.5 of the oFSMP. It would conform to the latest NFCC Guidance and will contain sufficient measures to secure and control battery safety.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP1-105]		
		The oFSMP would be subject to consultation with relevant bodies . The Applicant notes that no objection has been raised by NFRS so far. The Applicant looks forward to receiving this and will be in a position to update the SoCG once further discussions have been held with Party regarding the outstanding matter.

4.19 RESPONSES TO GEORGE HARDY'S WRITTEN RESPONSE

Table 4-17 Responses to George Hardy

WR Ref.	Summary Position of Interested Party	Applicant's Responses
George Hardy [REP1-112]		
<i>Economic Impact</i>		
Page 1	<i>"The market value of our property will be significantly reduced affecting our retirement, care home cost recovery and government Inheritance Tax revenue."</i>	Mr George Adrian Keyzer Hardy and Ms Susan Jeanette Hardy are included in the Book of Reference [EN010162/APP/4.3C] ("BoR") under Plot 9/1 in respect of an assumed highway subsoil interest. Plot 9/1 is a section of public adopted highway (known as Canton Road) over which no powers of compulsory acquisition or temporary use are

WR Ref.	Summary Position of Interested Party	Applicant's Responses
George Hardy [REP1-112]		
Page 1	<i>“The benefits of this development will be appreciated by those investors at the expense of us who live in the area and the government.”</i>	sought, the land being required for Work No. 8 (access) only. No land or interest in land is to be acquired. Mr Hardy and Ms Hardy assert that, as a result of the proposed Development, the market value of their property will be significantly reduced. However, the basis of this claimed diminution in value is not explained nor elaborated upon. Affected parties may have an entitlement to compensation in the event of interference with existing land rights and/or damage to land caused by the construction or operation of the proposed Development, subject to a qualifying claim being made. Any such claim would be determined in accordance with the body of statute and case law collectively referred to as the ‘Compulsory Purchase Compensation Code’. The Planning Statement [EN010162/APP/5.4B] sets out the significant benefits that the Development will provide. The contribution of the Development to delivering renewable energy represents a national benefit – helping Government deliver its net zero objectives – with the beneficiaries including residents who live in the area as users of energy.
Page 1	<i>“The unaccounted cost of this development is what it will take away from its neighbours and the community”</i>	The Proposed Development has been designed with robust mitigation measures to minimise environmental and community impacts. These measures are secured through the draft DCO [EN010162/APP/3.1C], and detailed in the relevant ES chapters, ensuring that adverse effects are reduced during construction, operation, and decommissioning.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
George Hardy [REP1-112]		
Page 1	<i>"We do continue to object to this development"</i> <i>"We do understand the inherent demand for energy. We do understand the desire of the land owners to secure a long term financial revenue stream. We do appreciate the government's undertaking with respect to Net Zero. However we cannot appreciate why we should have to be selected to pay for it. There are much more appropriate locations."</i>	Concerns regarding location of development and site selection are noted and a response was provided within Table 4-11 Principle of Development Responses to Relevant Representations [EN010162/APP/8.16A], on page 327.

4.20 RESPONSES TO JANET CARR'S WRITTEN RESPONSE

Table 4-18 Responses to Janet Carr

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr [REP1-116]		
<i>Land Interest</i>		
Page 1	"The first photograph shows Field DB041, tenanted by my family, which will be largely lost to solar panels and a substation if the project is approved in its current form. The photograph shows the growing crop of wheat on this BMV land this year. It also shows the ancient woodland immediately adjacent to the field boundary."	Ms Carr explains that her family's farmland is held under a Farm Business Tenancy (an "FBT"). This interest is noted under Plots 23/10, 23/18, 31/32, 31/33, 31/35, 31/38, 31/40 and 31/41 in the Book of Reference [EN010162/APP/4.3C]. The Applicant has concluded an option agreement (dated 1 July 2024) with the freehold owner of the land (see entry 16 of the Land and Rights Negotiations Tracker [EN010162/APP/4.4B]). Under the option agreement, it is the responsibility of the freehold owner (as 'Landlord') to engage with the tenant regarding termination of the FBT and the requirement to give vacant possession, including the payment of any monies that may be due to the tenant for the loss of land from the demise subject of the FBT. Please refer to the Applicant's responses on the landscape impact at the row below under the subheading of 'Landscape and Visual'.

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr [REP1-116]		
<i>Health and Safety</i>		
Page 1	"The substation is planned for that end of the field. A fire at the substation could prove catastrophic for the woodland and its ecology - the nearest part-time fire station is 5 miles away at Tuxford, too far to save the trees if they caught fire never mind machinery and infrastructure in the field."	The Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] [REP1-032] including a Senior Advisor to the National Fire Chiefs Council (NFCC), the expert advisor to NFRS and a former Head of Safety for another large Fire and Rescue Service. Following grant of the DCO, once a preferred make and model of battery has been identified, the Outline FSMP will be refined further, in consultation with relevant bodies, into a final FSMP which will be submitted for the approval of Newark and Sherwood District Council (NSDC).
<i>Landscape and Visual Impact</i>		
Page 1	"The next photograph shows the landscape beyond DB041 looking towards the narrow lane leading to Sutton on Trent. The fields immediately next to DB041 will be completely covered in solar panels, radically altering this beautiful view and the countryside for 40 years."	The area referred to consists of several fields to the northeast of the road junction east of Ossington – identified as E1 on sheet 7 of the Landscape Masterplan [EN010162/APP/2.11] [APP-030]. The second photograph, based on the view and description provided, appears to have been taken from a field to which there is no public access and as such views from this location are not a matter for the LVIA to consider. The effects on landscape character are considered as part of the assessment of effects on the Mid-Nottinghamshire Farms / Village Farmlands with Ancient Woodlands in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A].

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr [REP1-116]		
<i>Ecology and Biodiversity</i>		
Page 1	“Ostensibly pleasant grassland between the rows of panels for sheep to graze at Egmonton solar development during their June 2024 Open Day organised by Elements Green. A closer inspection shows a virtual mono-crop of a weak ryegrass type, allowed to grow too long for sheep to be interested in grazing (sheep prefer a close sward i.e. short blades of grass). Definitely not much biodiversity and certainly no gain. It is far more likely to be a net loss. Good daily livestock husbandry is virtually impossible in a field of panels as stock cannot be observed properly, if at all, when placed among the panels. Ill or dead sheep are therefore a distinct possibility - not a good look for the public or Elements Green. The closer photograph shows the reality of what happens under the panels - poor grass cover as a result of lack of sun, trampling by livestock, and soil in a poor state as a result of both.”	Table 4- 9 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 314, sets out the Applicant's responses regarding the practicality of sheep grazing. In terms of the biodiversity benefits, Planning Statement [EN010162/APP/5.4B] summarises a list of significant benefits that the Development would provide, notably including: • Significant tree planting with approximately 64,500 proposed trees creating 31 ha of woodland, as well as 49 km of new hedgerow, hedge and tree belts. • Significant landscape enhancements comprising approximately 989 ha of Solar PV (diverse) grassland, 405 ha of diverse grassland and 23 ha of ecotone. • Biodiversity and landscape mitigation have been proposed including 555 ha dedicated solely for these purpose and which will contribute to securing biodiversity net gains for habitats, hedgerows and watercourses All of which are secured by the ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1B].

General

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr [REP1-116]		
Page 1	<i>"The final photograph show the former Ossington airfield site, and tries to give an idea of the vast skies and panorama that will be lost if the scheme goes ahead. This uplifting area is such an important area for local people, their pets, and their physical and mental health, as well as the wildlife thriving alongside farming."</i>	Please refer to the Applicant's responses on the airfield site above in Table 4 14 Responses to Ossington Solar Concerns group, pages 256 to 257, at row 7.
Page 1	<i>"There is no discernible benefit for local residents whatsoever. This sleepy corner of Nottinghamshire will have to suffer the noise, disruption, mud, road damage, wildlife and amenity loss with little hope of redress or recompense. The democratic process is emasculated by the NSIP procedure - residents will suffer the consequences for decades to come."</i>	The Applicant notes these comments. Any concerns raised, including those relating to noise, disruptions to the local network, ecological impacts, and effects on recreational value, have been addressed in the relevant sections in the Responses to Relevant Representations [EN010162/APP/8.16A]: • Table 4-2 Ecology and Biodiversity, from page 276 • Table 4-10 Noise and Vibration, from page 324 • Table 4-14 Traffic and Access, from page 341 • Table 4-13 Socio-economics, from page 339 Measures to avoid or reduce the risk of adverse effects during construction, operation and decommissioning are secured in the following management plans:

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr [REP1-116]		• ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] • ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B] • ES Volume 4, Appendix 5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5B] • ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036] The Planning Statement [EN010162/APP/5.4B] demonstrates that the significant benefits that the Development will provide which are both national, regional and local in scale. As set out within Section 7.3 of the Planning Statement [EN010162/APP/5.4B], the Development would not cause any potential adverse effects that, considered individually, cumulatively or as a whole, are so severe that the decision maker should refuse the application and, moreover, that each aspect of the proposals is acceptable in planning terms when considered against the relevant national and local policies. It is therefore concluded that the benefits of the scheme, particularly the

WR Page Ref.	Summary Position of Interested Party	Applicant's Responses
	Janet Carr [REP1-116]	
		delivery of new solar generating capacity, are overwhelmingly greater than the residual adverse effects.

4.21 RESPONSES TO JEAN JOHNSON'S WRITTEN RESPONSE

Table 4-19 Responses to Jean Johnson

WR Ref.	Summary Position of Interested Party	Applicant's Responses
	Jean Johnson [REP1-117]	
<i>Principle of Development</i>		
Page 1	<i>"Looking at the app which shows where most electricity is generated, solar is only most efficient at the height of summer when most sunlight is available."</i>	Government policy is very clear that there is an urgent need for the provision of nationally significant low carbon infrastructure, including large scale solar, which is defined as being a Critical National Priority. This case is set out in detail in the Statement of Need [EN010162/APP/7.2] [APP-324] and further reinforced by the publication of the updated NPS EN-1 and EN-3 in January 2026.

Decommissioning

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jean Johnson [REP1-117]		
Page 1	<i>"I understand the efficiency of these panels decreases with age, then there is an issue with disposal. Has this been thought through."</i>	The operational lifespan of the development is a maximum of 40 years. Requirement 19 in Schedule 2 to the Draft DCO [EN010162/APP/3.1C] provides that not less than 6 months before the 40th anniversary of the earlier of the date: on which the final phase of the authorised development; or 3 years following the date on which the first phase of the authorised development first exports electricity on a commercial basis (as notified to the planning authority pursuant to requirement 3(2)), a decommissioning and restoration plan must be submitted to the Planning Authority for its approval, in consultation with the County Authority. Site Waste Management Plans (SWMPs) have been provided to secure waste management controls for the Development. Please refer to the Applicant's responses to Table 4-5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 294.

Landscape and Visual

Page 1	"Solar panels are unsightly and the wire fencing protecting them will not be disguised for some years by the planting of trees and hedges."	The concerns regarding the appearance of the solar panels and fencing, and the time required for hedgerow growth, are noted. The Applicant has responded to these concerns within Table 3-3 <i>Responses to Carlton on Trent Parish Council</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 24.

Traffic and Access

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jean Johnson [REP1-117]		
Page 1	<i>“Most of the proposed panels are to be sited in small rural villages where traffic is already a problem, this will be exacerbated if this development goes ahead.”</i>	The concerns on the construction traffic is noted. Table 4-14 <i>Traffic and Access</i> of Responses to Relevant Representations [EN010162/APP/8.16A], on page 341, summarises the Applicant's approach to mitigate the effect of the increase traffic flow as a result of the Development. During construction, additional traffic will be present on the network, but this represents a relatively small percentage of the total volume of traffic already present on the overall network, although this percentage is larger in areas of low baseline traffic levels. Traffic associated with the construction of the Development will result in no more than a marginal increase in the risk of collisions. Following the completion of the Development, traffic levels will reduce to extant levels and will therefore not influence any change in safety levels
Socio-economics, tourism and recreation		
Page 1	<i>“The village I live in has an old wartime airfield to the West of the village 50% of which is proposed for solar panels. Over the years the old airfield has become an unofficial amenity not only for villagers but for the following people.</i> <i>1. Walkers. People in wheelchairs and mobility scooters are also able to take advantage of the old concrete runways which are still there.</i>	The comments on the amenity value and ecological value of the former Ossington airfield is noted. The Applicant's responses to the ecological value of the former Ossington airfield is set out within Table 4 15 Responses to Ossington Solar Concerns group on page 257 which suggests that the potential biodiversity effects on lapwing and Laxton Sykes SSSI, in the area around Ossington airfield and all other parts of the Order Limits have been assessed. ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] concludes that with appropriate mitigation

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jean Johnson [REP1-117]		
	<i>2.Dog walkers use it on a daily basis.</i> <i>3.Bird watchers. Barn owls, lapwings and skylarks all breed there and are encouraged with the help of the local farmers. Migrating birds also use the area as a resting place. These birds find food in the area which these panels will be an obstruction. In the neighbouring wood a rare species of bat can be found the Barbastelle these could be disturbed by noise created by the installation of these panels which I believe is extremely noisy."</i>	measures which are secured, no significant adverse effects have been identified. The Applicant then responded to the matter on amenity value above in Table 4 15 Responses to Ossington Solar Concerns group on page 259.
Page 1	"Artists also enjoy this place for the wonderful skies and views."	Noted
Page 1	"Stargazers also have visited the place has it is unpolluted by light."	Noted
Page 1	"..the airfield attracts people interested in the history of old airfields, so we have had a information board made to help visitors locate various places and buildings when it was	Please refer to the Applicant's responses on the airfield site above in Table 4 15 Responses to Ossington Solar Concerns group, pages 255 to 256,

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jean Johnson [REP1-117]		
	<i>operational, this of course will obscure the view if solar panels are sited on part of the airfield."</i>	
Page 1	<i>"...when talking to people who will have to look at these panels on a daily basis they are very much opposed to the project, only the landowners who will benefit financially are the winners."</i>	The Applicant notes these comments. As evidenced in the Consultation Report [EN010162/APP/5.1] [APP-296], input received during consultation led to meaningful refinements and the consultation process was extensive and iterative. The Applicant will continue to discuss any outstanding matters with the statutory bodies throughout the examination. As set out in Section 7.2 of the Planning Statement [EN010162/APP/5.4B], the Development would deliver national economic and social benefits in line with the Government's wider objectives of delivering sustainable development. As such, the benefits of the Development are considered to be significant at national level.

4.22 RESPONSES TO BBS LAW LTD ON BEHALF OF MR R GILL AND DRONE DEFENCE SERVICES LTD'S WRITTEN RESPONSE

Table 4-20 Responses to BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
<i>Introduction</i>		
	<i>"The statement is intended to be read as a single, composite submission, and addresses matters arising from the application which are relevant to:</i> <i>1. Mr Gill in his capacity as owner and occupier of and</i> <i>2. Drone Defence Services Limited as an established occupier and business operating from the site, including as a beneficiary of long-standing express easement rights affecting land within the Order limits.</i> <i>The submissions build upon the earlier relevant representations made on behalf of both parties and address, amongst other matters, the impacts of the proposed development and the</i>	Noted.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>justification for compulsory acquisition and interference with existing rights."</i>	
1.2 - 1.3	<i>"1.2 There is no general dispute of issue over the nature and extent of the application site or the description of the proposed development, although it is clearly contended by those objecting here that the site and the detail of the development should be altered to enable it to be considered fully satisfactory and to ensure that benefits fully outweigh harm.</i> <i>1.3 It is however contended that the site boundaries and development details should be altered to address significant harms that outweigh benefits, particularly for the 42-acre field south and west of (Title Number NT332979), where only circa. 11 acres of panels are proposed. This parcel is not indispensable, as panels and infrastructure can be relocated or omitted with minimal impact on overall capacity, supported by the scheme's flexibility demonstrated in setbacks and removals applied</i>	The Applicant has prepared a plan (Appendix B to the Responses to Deadline 1 Submissions [EN010162/APP/8.21]) to assist with its response to the Written Submissions ("WS") made by Groves Town Planning on behalf of Mr Richard Gill and Drone Defence Services Limited ("DDSL"). The plan shows the following: • Title No. NT332979 shaded yellow, which is the land burdened by the rights to lay "service installations" pursuant to a Transfer dated 30 September 1998 ("the Rights"); • Title No. NT329682 shaded green, being Cauntton Lodge Farm ("CLF"), the property owned by Richard Gill and Lisa Gill and which benefits from the Rights; • That part of the Order Land relevant to the WS, shown edged in red, together with the relevant Plot numbers; • The relevant authorised works; • The proposed new permissive bridleway 5, dashed purple; and • Existing public rights of way in green. Plots 16/1 and Plot 15/17 which are the closest to CLF, are proposed for mitigation (Work No. 3). Plot 15/16 is proposed for solar PV (Work No. 1). All of these land parcels are shown coloured pink on the Land Plans [EN010162/APP/2.2B] and proposed to be subject to full compulsory acquisition powers.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>elsewhere (e.g., blocks 9-SR32 and 9-SR33 to the west, and reductions in Order Limits).</i> <i>1.4 This submission anticipates examiner scrutiny by highlighting evidential gaps in the Applicant's assessments, such as the RVAA's erroneous assumption of an existing southern boundary hedgerow (which does not exist, leading to understated visual impacts), the heritage chapter's omission of as a nondesignated heritage asset (NDHA), and the failure to address an independent heritage report recommending complete removal of solar infrastructure from Title NT332979</i> <i>1.5 An Accompanied Site Visit (ASV) is requested to verify local topography, views, operational constraints, and the scale of impacts from the property itself (including balconies, gardens, and main rooms).</i> <i>1.6 Additionally, if the Applicant persists with compulsory acquisition (CA) powers for this parcel, a Compulsory</i>	The Applicant completed an Option Agreement for lease of Plots 15/16, 15/17 and 16/1 on 18 April 2024 with the owner of the land. See Row 23 of the Land and Rights Negotiations Tracker [EN010162/APP/4.4B]. The Applicant disagrees with the submissions made in paragraph 1.3 and 1.4. of the WS for the reasons explained below.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>Acquisition Hearing is requested to present oral evidence on alternatives, harms, and legal conflicts. These procedural steps would enable direct verification and potentially resolve flaws through redesign, avoiding unnecessary harm in a project of this magnitude."</i>	
<i>The Objectors</i>		
2.1 – 2.6	<i>"2.1 Mr and Mrs Gill own and reside at [redacted] The property is isolated but generally sits in open agricultural land to the south of the settlement of Norwell Woodhouse.</i> <i>2.2 The dwelling has no connection to usual utilities with all such services provided independently of any physical links. Provision has been secured in the form of easements across adjoining land which enable connection to services should this become necessary as a result of current off-grid arrangements becoming unsustainable or unviable.</i>	The Applicant notes that no information is provided in the WS to confirm whether DDSL or Mr Gill have any existing apparatus in the Order Land. As explained in the Responses to ExA's First Written Questions [EN010162/APP/8.22] to Question 11.1.4 the Applicant has requested confirmation of this point but it has not been answered. Paragraph 6.4 of the WS refers to reliance on 'sensors and infrastructure located on adjacent land, facilitated by long-established easement rights' but no mention is made of any existing infrastructure being within the Order Land itself. Insofar as there is any such existing installed infrastructure, the Applicant has requested details of what has been installed; where it is located; whether planning permission was obtained; and whether the consent of the landowner was secured. The absence of any response to these requests means that the Applicant cannot assess the alleged impact of the GNR proposals on CLF or on the operations of DDSL. Nor is it known whether any such existing infrastructure was installed lawfully from a planning perspective and/or from a land rights perspective pursuant to the Rights. The Applicant submits that no weight should be applied to alleged

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>2.3 Mr Gill also operates a business from the property and commercial premises elsewhere in Nottinghamshire. The business involves the provision of protective systems which prevent the misuse of drones in terms of illicit use around secure locations – such as prisons, and in terms of protection of clients from invasion of privacy – such as residential properties or intrusion on commercial activity – access to events.</i> <i>2.4 The space available at enables testing of equipment and systems away from sensitive locations and in line with the provisions of the Civil Aviation Authority.</i> <i>2.5 Relevant Representations RR- 045 and RR- 181 have been submitted to address the concerns arising from impacts on the business operation and residential property.</i> <i>2.6 Further DDS is a licensed occupier under a 1998 Deed of Easement, which grants rights to "the owners and occupiers for the time being" over</i>	impacts of the proposed Development on any existing infrastructure that has not been lawfully installed. With regards DDSL's business activities, no information has been provided in the WS to address the Applicant's question concerning planning permission for that business use. The Applicant notes that the activities listed in paragraphs 2.3, 2.4, 6.2 and 6.4 of the WS do not accord with the residential planning status of CLF, nor with the agricultural planning status of Plots 15/16, 15/17 and 16/1 of the Order Land. The Applicant submits that no weight should be applied to alleged impacts of the proposed Development on an unlawful business use. The Applicant is aware that a planning application has very recently been made by Mr Gill on 3rd December 2025 for: "<i>The erection of an eco-pod Home Office within the garden of Caunton Lodge Farm to facilitate home working</i>". This expressly states that: "<i>There will be no change of use or additional accommodation units</i>". The application carries reference 25/02039/HOUSE and it proposes the construction of a 6.08m x 3.25m building, 2.72m in height, in the garden of CLF. The accompanying design and access statement is clear that the pod will not be used: '<i>for any activity that would alter the residential character of the property</i>'. This implies that there is no planning permission for business use at CLF, which further reinforces the need to understand to what extent the use of CLF and surrounding land by DDSL is lawful. This use is summarised in para 6.2 of the WS as a: '<i>working location for research, development and operational testing rather than as the main administrative base of the company</i>'.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>adjacent lands (Lots 1, 2, and 3, including Title NT332979). These include rights of way for all purposes (with vehicles), free passage of services (e.g., water, electricity, telecoms) via existing or new conduits, and entry for maintenance, enduring for an 80-year perpetuity period until 2078."</i>	
<i>Policy Considerations</i>		
3.1 – 3.6	<i>"3.1 The Secretary of State (SoS) is required to have regard to any relevant national policy statement (NPS), amongst other matters, when deciding whether to grant a DCO. Where there is a relevant NPS in place DCO applications are determined in line with section 104 of the Planning Act 2008.</i> <i>3.2 It is additionally the case that consideration needs to be given to the provisions of those parts of the 2008 Act which relate to provisions for the Applicant to acquire land covered by the Order – specifically section 122.</i>	This is noted. Planning Statement [EN010162/APP/5.4B] demonstrates that the Application has been assessed against the relevant policies, and is considered to be consistent with NPS EN-1 and EN-3, and is also consistent with the NPPF and other important and relevant planning policies. NPS EN-1 is clear that substantial weight should be given to the need for the types of infrastructure covered by this NPS (paragraph 3.2.7) and that this need is urgent (paragraph 3.2.6). paragraph 4.1.3 of NPS EN-1 states that the SoS should "start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the NPSs clearly indicate that consent should be refused". The presumption in favour of granting consent applies to the Development and the application should be determined in accordance with that presumption by granting consent.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>3.3 The following NPSs are considered relevant to the determination of this DCO Application and set out the assessment principles for judging impacts of energy projects: • EN-1 – Overarching National Planning Policy Statement for Energy • EN-3 – National Planning Policy Statement for Renewable Energy Infrastructure</i> <i>3.4 It is acknowledged the provisions of the NPS will take precedence over the NPPF where there is contradiction or conflict. It is however considered important to note areas of relevance to the representation tabled here which relate to the provisions of the Framework.</i> <i>3.5 These include sections relating to design and amenity and particularly Paragraph 200 insofar as it relates to the protection of existing businesses from the impacts of new development and the</i>	Paragraph 200 of the NPPF (December 2024)⁴ relates to ground conditions and pollution and states that “Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.” The Development does not give rise to any unacceptable impacts and could therefore not give rise to unreasonable restrictions on any existing lawful business use. As such, the Development is consistent with the NPPF. The Development Plan policies identified for Newark and Sherwood and Nottinghamshire have also been taken into account as material considerations. Planning Statement [EN010162/APP/5.4B] demonstrates that the Development would not cause any potential adverse effects that, considered individually, cumulatively or as a whole, are so severe that the decision maker should refuse the application and, moreover, that each aspect of the proposals is acceptable in planning terms when considered against the relevant national and local policies. It is therefore concluded that the benefits of the scheme, particularly the delivery of new solar generating capacity, are overwhelmingly greater than the residual adverse effects.

⁴ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>extent to which those businesses would have unreasonable restrictions placed upon them as a result of development permitted after they were established.</i> <i>3.6 The Development Plan Framework for the impacted area of Nottinghamshire includes the: • Newark and Sherwood Amended Core Strategy (March 2019) and Allocations and Development Management Development Plan Document (July 2013) • Nottinghamshire Minerals Local Plan (March 2021) • Nottinghamshire and Nottingham Waste Local Plan (September 2025)"</i>	
<i>Cumulative Impact</i>		
4.1 - 4.5	<i>4.1 Review of the Local Impact Reports prepared by both Nottinghamshire County Council and the Newark and Sherwood District Council identifies considerable concern over the cumulative impact of energy related development schemes in close proximity</i>	Cumulative developments have been considered as part of the environmental statement, as such the Development was not viewed entirely in isolation. The findings of the cumulative assessment are summarised in Table 4-5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], page 301 – 302.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>to the site subject to the order under consideration here.</i> <i>4.2 It is noted that there are several other nationally significant solar development proposals within a short distance of the proposed order limits of this project. Within Nottinghamshire, this includes One Earth Solar Farm (2.36km from the order limits) and Steeple Renewables Project (15.00km from the order limits), both of which are at examination stage.</i> <i>4.3 Further nationally significant solar developments have been approved in Lincolnshire which involve underground cabling to the connect to substations in Nottinghamshire, including Gate Burton, Cottam, West Burton and Tillbridge Solar Projects.</i> <i>4.4 There are also many solar projects which have been proposed through applications submitted to the LPA under the TCPA 1990.</i> <i>4.5 The Great North Road Solar and Biodiversity Park must be considered</i>	Further details on the cumulative landscape and visual effects are provided in Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. The Applicant is in active discussion with the local authorities on this matter, and responses to cumulative impact concerns raised by NSDC and NCC in their Local Impact Reports are set out in the following tables of the Report: • Table 2-4 Responses to NCC Comments on Traffic and Transport • Table 3-1 Responses to NSDC's Comments on Landscape and Visual Impacts • Table 3 2 Responses to NSDC's Comments on Biodiversity (including Net Gain) and Arboriculture

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>having regard to the overall impact of the widespread developments planned within the area. It cannot be viewed entirely in isolation.</i>	
4.6 – 4.7	<i>4.6 In this context it should be noted that for nationally significant solar farms, the National Policy Statement for Renewable Energy Infrastructure (EN-3) advises that such solar farms should be sited on previously developed and non-agricultural land.</i> <i>4.7 The County Council notes that the proliferation of these projects in Nottinghamshire and Lincolnshire is due to a combination of the legally binding target for “net zero” and easy access to the grid connections at the former coal fired power stations.</i> <i>Concern expressed by the County is shared by the Objectors here in terms of the adverse cumulative impact of this growing list of projects which will change the face of the wider Trent Valley area</i>	Section 6.8 of the Planning Statement [EN010162/APP/5.4B] demonstrates that the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. The Applicant's responses on the use of BMV land can be found within Table 3-1 <i>Responses to Bathley Parish Council</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], at page 10.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	<i>and impact on the way the valley is perceived. Whilst there have always been elements of non-agricultural industry in the Nottinghamshire countryside, these proposals are resulting in the wholesale transformation of green fields into glass and steel.</i>	
Landscape and Visual		
5.1 – 5.2	<i>“5.1 It is considered that the development will have an adverse and significant effect on the landscape resource at a regional scale, as it is cumulatively considered with a number of large NSIPs and consented schemes.</i> <i>5.2 The submissions made by the Applicant in this regard are weak and fail to consider impact on a strategic scale. This is a rural agricultural landscape and the schemes in combination have the potential to permanently change the character of the immediate and wider landscape.</i>	The Applicant notes concern about landscape change at the regional level due to solar and BESS developments, however it is not the function of cumulative assessment for an individual project to provide an evaluation of such change. The purpose of cumulative assessment is to inform the decision to be made relating to the individual project, as set out within Appendix 3 to the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. The assessment provided in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] fully considers the effects arising from the Proposed Development with all relevant short-listed cumulative projects on the local LCTs, regional landscape character area (Mid-Nottinghamshire Farmland) and national landscape character area (NCA 46 Trent and Belvoir Vales). Given that the latter two areas extend beyond the 2km study area, the LVIA therefore considers the effects of the Proposed Development on landscape character more widely than the 2km study area.

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5.3	<i>5.3 The Topography of the area, which forms the setting of [redacted] is described in the LPAs Landscape Character Assessment SPD (December 2013) for the Mid-Nottinghamshire Farmlands Regional Area. Caunton Village Farmlands with Ancient Woodland area is identified as a specific character area (Policy Zone MN PZ 28). The characteristic visual features of the landscape are described as; gently undulating rounded topography, with some flat areas; medium distance views to frequently wooded skylines; intensive arable fields with generally strongly trimmed hedges; occasional blocks of mixed deciduous woodland and busy A616 runs through the area NW – SE.</i>	The LVIA provided in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] focusses on the landscape character types rather than the smaller individual policy zones as set out at paragraphs 69-70.
5.4	<i>5.4 The scale and extent of the Development would also lead to significant effects on views from large group of receptors across the scheme area, changing rural view through the introduction of the solar arrays. The LVIA does consider the 'sequential' views at a</i>	Agreement that sequential assessment has been provided is noted, however the assessment is not only provided “<i>at a Site level</i>”. The main LVIA considers effects across the agreed 2km LVIA study area with all operational and consented cumulative shortlisted projects, and the cumulative assessment uses the same methodology and approach in relation to developments in planning.

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	<i>Site level, however the cumulative impacts on receptors as they move through the landscape has not been assessed. The LVIA needs to address receptors on PRow's and local roads, who are moving through this landscape across several kilometres.</i>	Given this, sequential effects are considered with all cumulative developments through considering the effects of the Proposed Development when it is seen as part of a journey during which the viewer may also see other developments.
5.5	<i>5.5 Previous representations have also highlighted omission of detail local assessment on landscape and visual impact.</i>	It is unclear what matters are being referred to in this comment.
5.5 – 5.8	<i>5.6 The direct impact of the development from across Cauntton Lodge Farm and the entirety of its curtilage.</i> <i>5.7 Consideration of the nature of the receptor has been assessed in the broadest of terms as opposed to the very specific and detailed impacts from the dwelling and the site in which it is set.</i> <i>5.8 The proposed panels not only extend to within 150m of the boundary of the curtilage they extend across the</i>	Effects on residential visual amenity at CLF are considered in ES Volume 4, Appendix 7.6: Residential Visual Amenity Assessment [EN010162/APP/6.4.7.6] [APP-213] . The assessment is as detailed as is necessary to establish whether more detailed assessment is warranted (Stage 3 of the RVAA methodology as described). The illustrations are redacted and the Applicant is unable to see or respond to them. It should be noted that the height of the solar arrays would be a maximum of 3.5m as set out in Table 5.3 of ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048] .

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	<i>viewpoint of any receptor on the property.</i> <i>5.9 These illustrations prepared by the Objector, clearly demonstrate the specific local impact of the development. Imagery probably understates impact as it does not show the contours and undulation of the land across which panels will be sited</i> <i>5.10 Critically the view of any receptor within the dwelling or within the curtilage will be harmed as the current perception of the agrarian, rural landscape is interrupted by a dominant horizontal feature which bisects the transition from a level field gently rising to the escarpment to the south.</i> <i>5.11 It needs to be reiterated in this context that the panels are not placed at a low height above ground level, they sit with a top edge 4m above ground level.</i> <i>5.12 This is an adverse and significant impact.</i>	

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5.13	<i>5.13 Newark and Sherwood Council reference core policy 13 (Landscape Character) Amended Core Strategy Development Plan Document 2019: 'New development which positively addresses the implications of relevant landscape Policy Zone(s) that is consistent with the landscape conservation and enhancement aims for the area(s) ensuring that landscapes, including valued landscapes, have been protected and enhanced.' Policy DM5 (Design) Allocations and Development Management Development Plan Document 2013: 'Supporting text states - The diversity of landscape and built form within the Policy DM5 (Design) of the Allocations and Development Management Plan Document 2013 states: 'The diversity of landscape and built form within the District displays much local distinctiveness which the Council is keen to see reflected in new development'</i>	Please see the Applicant's response to LIR 8.35 – 8.41 within Table 3-1 Responses to NSDC's Comments on Landscape and Visual Impact above, at page 81.

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	<i>5.14 The District Council concludes that the proposed development is in direct conflict with the development plan. The Objector fully supports this position.</i>	
5.15 – 5.18	<i>5.15 The LVIA submitted with the application for the Consent Order is inevitably flawed as it can only review a limited number of receptors. It is acknowledged that a standard methodology for identification of receptors has been established but this can still miss significant view points from which the impact of the development will be experienced.</i> <i>5.16 In this case the only receptors identified in close proximity to [redacted] are receptors 26 and 32. Receptor 26 on a bridleway north of Caunton. This viewpoint looks across existing fields towards the [redacted] are It follows that views from the receptor of the Objector's property and the proposed relocated public right of way will experience the same landscape and visual impact albeit viewed from north to south rather than</i>	The location of representative viewpoints used to inform ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A], was agreed with NSDC. These are not intended to be exhaustive and do not cover every possible view of the Site. Rather, they were selected to proportionately represent the range of views available, taking into account the activity and sensitivity of visual receptors. This is in accordance with best practice as set out in Paragraph 6.21 of Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. It should be noted that viewpoints and receptors are not the same, and that viewpoints 26 and 32 are not receptors. The assessment of effects on visual receptors in the LVIA encompasses not just the viewpoints but all publicly accessible routes and areas within the study area, and the effects identified are illustrated by Figures 7.6 and 7.7 in ES Volume 3 [EN010162/APP/6.3.7A] [AS-035]. The viewpoint description for viewpoint 32 near Norwell Woodhouse notes that pylons and wind turbines are seen on the skyline. This is a factual point and does not reflect any judgement in relation to them. No comment is made regarding such features in the residential visual amenity assessment for the property which is approximately 0.8km from viewpoint 32 and has a different outlook.

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	<i>south to north. The Applicant's analysis of this viewpoint accepts that notwithstanding mitigation the development would be visible across the period of construction and operation.</i> <i>5.17 Viewpoint 32 takes a view from a public footpath south of Norwell Woodhouse. Assessment again concludes that the proposed solar panels will be visible. In this case it is considered that impact is understated having insufficient regard to the changes in level and general topography from the footpath to the south towards [redacted] and the Order limits. The viewpoint does not take account of the change experienced as any viewer moves along the footpath towards the proposed panels.</i> <i>5.18 The assessment references the presence of pylons and wind turbines as having impact on the existing landscape setting from [redacted] the perspective of this viewpoint. Illustrations from contradict this contention with such</i>	

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	<i>features having negligible visual impact on the landscape. The pylons carry lower voltage cables on the telegraph poles. It is difficult to identify reference to wind turbines</i>	

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5.19 - 5.20	<i>5.19 On this basis it can be concluded that there are serious concerns over the level of strategic harm to valued landscape across the area affected by the proposed development, and very clear specific harm to the landscape and visual qualities of the area close to the Objector's property.</i> <i>5.20 Notwithstanding concerns over wider unacceptable levels of landscape and visual impact, it can thus be demonstrated that there is significant specific and local harm which is sufficient to outweigh the benefits of the development"</i>	Please refer to the responses set out above

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<i>Impact on existing use rights of the property</i>		
6.1 – 6.18	6.1 Submissions made under RR-045 on behalf of Drone Defence Services clearly set out the basis for concern over the impact of the proposed development on the existing use of [redacted]. 6.2 Drone Defence Services Limited is a UK-based company engaged in the development, testing and deployment of defence and security technologies, including systems for the detection, monitoring and management of unmanned aircraft. The activities undertaken by the company are relevant to national security, public safety and the protection of critical infrastructure, and form part of a sector that is supported in national policy as being in the public interest. The company operates from [redacted] pursuant to permissions and licences that are already granted and in force, and the site functions as a working location for research, development and operational testing rather than as the	Drone Flying Activities DDSL, in its Relevant Representation [RR-045], states that its current drone flying activities do not require a licence from the Civil Aviation Authority (“CAA”). This is understood to be on the basis of (1) the weight and specification of the drones, and (2) that they are operated in accordance with Visual Flight Rules (“VFR”), i.e. flown within sight of the operator in accordance with CAA Regulations Open Category A3. Flying pursuant to open Category A3 regulations requires a separation buffer of 150m from Congested Areas to be maintained. There are 4 types of Congested Areas –recreation, residential, industrial and commercial uses. The presence of solar panels does not fall within any of these categories therefore the basis for DDSL’s assumption that there would be a 150m separation buffer from any PV panels is unclear. Accordingly, DDSL has not evidenced why the presence of solar PV panels in Plot 15/16 would prevent its current VFR drone testing operations pursuant to Open Category A3 from taking place. Open Category A3 regulations do require a 50m buffer to be maintained to protect Uninvolved Persons, namely any persons who have not been briefed about the drone operations and safety requirements. This would include for example, users of public rights of way, occupiers of dwellings, agricultural workers and construction workers. DDSL assert that the presence of solar PV gives rise to a risk of an elevated Ground Risk Class (“GRC”) during the construction of the proposed Development. However, this could be mitigated (if necessary) by

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	main administrative base of the company. 6.3 The current use of the property in association with the business represents a unique position which has taken advantage of the specific characteristics of the location, terrain, space, air space and the absence of residential or commercial neighbours. As previously noted this enables the company to test and research the use of unmanned aerial systems and air space monitoring systems to deliver equipment and services which prevent illicit and inappropriate use of drone technology. 6.4 Activities undertaken at the property include routine drone flight testing, radarbased detection and monitoring, and the operation of sensitive RF systems. These activities typically take place within the immediate environs of the property, including within visual line of sight and over adjoining land within a limited local operating area. The operation of these systems is not	ensuring that the Applicant's construction personnel are appropriately briefed and trained so that they are no longer 'Uninvolved Persons' for these purposes. In those circumstances it would not be necessary to maintain a 50m separation buffer from the persons undertaking works in Plot 15/16 during construction. It is acknowledged by the Applicant that the proposed Development will create a new permissive bridleway 5, as shown on the plan at Appendix B to the Applicant's Responses to Written Representations EN010162/APP/8.21). However, DDSL has not explained why the drone flying operations could not continue to be launched from CLF under VFR and for the flights path to be directed away from the new permissive bridleway. The land surrounding CLF is open agricultural land, is not 'congested', and flight paths within 50m of public and permissive rights of way can be avoided. DDSL's Relevant Representation [RR-045] goes on to explain that it is: '<i>actively pursuing CAA accreditation for an Atypical Air Environment (AAE), a critical step towards fully integrated Beyond Visual Line of Sight (BVLOS) operations, representing a significant commercial advancement for Drone Defence and its partners.</i>' The Applicant understands that this would enable DDSL to fly drones from a remote terminal rather than rely on VFR. DDSL does not say whether it has obtained this licence; whether it has applied for one; whether it requires any infrastructure to operate on this basis; whether it has necessary planning and landowner consents; nor whether it has the resources to implement these proposals. In any event, the presence of solar PV would not prevent drones from being flown pursuant to a licence to fly BVLOS, including overflight over the solar PV fields. Furthermore, the activities that would be enabled by CAA accreditation for AAE and BVLOS can be simulated by using human observers. Accordingly,

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	confined to the curtilage of the property but relies on lawful connectivity to sensors and infrastructure located on adjacent land, facilitated by long-established easement rights that enable the installation and operation of service infrastructure linking those systems back to the operational base at [redacted]. 6.5 Lawful overflight does not require the consent of underlying landowners. 6.6 The Objectors benefit from express easement rights reserved in the Transfer dated 30 September 1998, including rights for the passage and running of services and rights to enter the burdened land to lay, construct, connect to, maintain, repair and replace service installations over an 80-year period. These are long-standing, registered proprietary rights which run with the land and are exercisable by both owners and occupiers of [redacted]. They are binding on successors in title and are not contingent on current physical manifestation or immediate use. Any	DDSL has not substantiated its assertion that the site's usability would be 'extinguished' by the proposed Development. Nor has the Applicant evidenced any of the assertions in paragraphs 6.7-6.12 of the WS concerning the alleged impact of the proposed Development on the DDSL business activities. Paragraph 200 of the Framework's agent of change principles where new development affects an existing business or facility is irrelevant. The existing business is not a lawful planning use, nor is there any evidence that the proposed Development will impact upon it. Please refer to the response above to row reference. 3.1 to 3.6. The Rights The Applicant acknowledges that a person may fly drones over land provided that the regulations which apply to the appropriate type of flight (VLOS or BVLOS) are adhered to. However, neither DDSL nor Mr Gill have a <i>property right</i> which entitles them to overfly the Order Land, and which could therefore be interfered with pursuant to the powers in the Draft DCO [EN010162/APP/3.1C]. The powers of compulsory acquisition sought in the Draft DCO [EN010162/APP/3.1C] are not therefore relevant to the issue of whether or not drone flight can continue. Paragraph 6.4 of the WS implies that DDSL relies on drone related infrastructure for its operations pursuant to the Rights. As explained above, DDSL has not confirmed where that infrastructure is or what it comprises. If there is any such infrastructure in the Order Land, the Applicant questions whether this falls within the scope of 'Service Installations' so as to be authorised pursuant to the terms of the Rights, copied below (note that CLF is the property referred to as Lot 4):

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	interference with those rights would require lawful acquisition and appropriate compensation. 6.7 The systems provided in the context of the easements are critical to the continued success and operation of the business. The suitability of the site for these purposes is inherently location-dependent and arises from its rural seclusion, low levels of unrelated activity, i.e. an agricultural field rather than a site covered with technical equipment, absence of intensive development, low background RF noise environment, and the current ground conditions of surrounding land, which together provide a low-risk operating context for testing and monitoring activities. These baseline conditions underpin both the physical deployment of sensors across the wider area and the functional performance of radar and RF systems connected via the easement network 6.8 Solar infrastructure (inverters, transformers) emit electromagnetic	(c) The right for the owners and occupiers for the time being of lot 4 to the free passage and running of water, soil, gas, electricity and other services through the drains, channels, sewer pipes, wires, cables, water courses, gutters and other conducting media including ancillary and connected equipment and construction works (hereinafter referred to as "Service Installations") now or at any time within the Perpetuity Period laid or constructed on, under or through or which belong to the property and which serve lot 4 subject to payment of a fair proportion of the cost incurred in cleaning, maintaining, repairing and renewing those used in common. For the purposes of this Transfer the Perpetuity Period shall mean the period of 80 years from 13 March 1998 being the perpetuity period for the purposes of the Perpetuities and Accumulations Act 1964 (d) The right for the owners and occupiers for the time being of lot 4 at any time within the Perpetuity Period to enter after giving reasonable notice upon the Property to lay or construct Service Installations on, under or through the Property or to make connection to Service Installations now or within the Perpetuity Period laid or constructed on, under or through or which belong to the Property causing as little damage as possible and making good to the reasonable satisfaction of the Purchaser any damaged caused The technical equipment, sensors, radar and RF systems referred to in paragraph 6.7 of the WS are very different to the nature of the services envisaged by the Rights. Nor do such systems serve the benefitting land within CLF, which is a residential property. Rather, they serve a business, whose use of the property may be unlawful.

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	interference (EMI) and RF noise, raising the ambient floor and masking drone signals (Pager Power note; analogous to MoD objections on radar). Panels create physical obstructions and reflective clutter for radar sensors, generating blind spots (e.g., spurious reflections confusing detection). 6.9 The construction process will limit drone flights. 6.10 The proposed development will remove these baseline requirements and therefore scope for continued operation of the specific aspect of the business from the site. 6.11 The presence of the panels, relocation of the public right of way. The change of the status of the land in terms of Ground Risk Class – change from low risk farm land to a high risk commercial use renders the site as unusable for the current uses possible under CAA regulations. 6.12 There would be significant technical, regulatory and practical difficulties to be	Insofar as there are other standard services, such as water pipes or gas connections to the property, these are likely to fall within the scope of the Rights. However, despite the Applicant's express request for information about any existing services within the Order land, no information has been provided to enable the Applicant to comment further. The Applicant acknowledges that Mr Gill drew attention to the existence of the Rights during consultation in January 2025. For the reasons set out above, the Mr Gill has not demonstrated that the Development conflicts with the easement, nor that the easement constrains the delivery or operation of the scheme. A reduced scale proposal to the Development is not considered by the Applicant to be a reasonable alternative. This is because a smaller Development would not be capable of delivering the same generation capacity as the current proposal and would therefore not meet the Development requirements. This approach was endorsed in the Secretary of State's decision letter for the Sunnica Energy Farm DCO (dated 12 July 2024).

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	able to replicate the accommodation and facility currently available 6.13 Paragraph 200 of the Framework is clearly applicable and must be weighed in the balance of competing benefit and harm in the consideration of the DCO. 6.14 In essence Paragraph 200 has three elements • Integration – new development should fit in with existing businesses, not the reverse • Protection of existing users – established business should not face restrictions as a result of a more recent development. • Agent of change – if new development negatively affects an existing business or facility, the development must provide suitable mitigation measures. 6.15 The requirements of Paragraph 200 are wholly applicable in this instance.	

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	• New development does not fit in with the existing business. It undermines continued operation. • New development will introduce restrictions to the point of the existing business becoming inoperable. • New development as proposed clearly has negative impact with no suitable mitigation. 6.16 Whilst possibly an untypical example of the application of the agent of change principle, the provisions of Paragraph 200 are clearly designed to remove scope for a new development to become established in such a way as to prevent an existing enterprise to be constrained or restricted and certainly for that new development to compromise the existing business to the degree that it can no longer operate. 6.17 The onus provided through Paragraph 200 is clearly placed on the development to amend proposals to remove these constraints.	

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	6.18 The Applicant has previously demonstrated flexibility by reducing the scheme and removing land elsewhere from the Order Limits. Despite the easement being registered, known to the landowner, identifiable through land referencing, and expressly raised during consultation in January 2025, this field has been retained. The absence of response on this point results in the Objector having to respond in the manner highlighted above and to have no indication as to why further amendment is being resisted.	
<i>Amenity</i>		
	7.1 In addition to the impact on visual and landscape amenity the proposed development will have a detrimental impact on the amenity of those occupying the existing dwelling on the site. 7.2 The existing dwelling serves to provide its occupiers with a tranquil,	The Public Right of Way referred to in point 7.3 is proposed new permissive bridleway 5, as shown on Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A], sheet 16. The new permissive bridleway lies, at its closest, 330m southwest of the nearest building of the respondent's property and approximately 310m from the Site boundary where the boundary is closest to the respondent's property. An existing bridleway (NT Caunton BW13) lies approximately 550m in the same direction from the respondent's property. Currently the intervening land is used for arable farming, and the same land use is

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	relatively isolated setting, with scope not only to enjoy the privileges of that setting but also to secure the benefits of living almost entirely off-grid. 7.3 This level of amenity will be compromised not only by the physical impact of the development itself but as a consequence of the intention to relocate a public right of way immediately adjacent to the boundary of the site. Views into previously totally private parts of the dwelling and its curtilage will become available where no such intrusions were previously possible. 7.4 Such a level of loss of amenity is contrary to the provisions of the development plan and should not be simply dismissed as a minor or local impact of the proposed development, but part of the cumulative harm arising from the development. 7.5 It is also noted that the easements onto land within the Order Limits provide connection to services and facilities for the dwelling. Whilst there is a clear	proposed (see Outline Landscape and Ecological Management Plan [EN010162/APP/2.12A] sheet 16. At the Development boundary, closest to the respondent's property, there is an existing hedge, and the Outline Landscape and Ecological Management Plan shows that this is proposed to be extended to the south. The proposed permissive bridleway is therefore not "immediately adjacent to the boundary of the site", nor would it afford "views into previously totally private parts of the dwelling and its curtilage will become available where no such intrusions were previously possible".

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	ambition to secure all necessary provision of essential services from within the site there will inevitably need to be some scope to ensure provision and back up services to cover unforeseen circumstances.	
<i>Heritage Impact</i>		
8.1 - 8.4	8.1 Newark and Sherwood Council are preparing a list of local important buildings in terms of heritage value. 8.2 As it stands [redacted text] is not locally listed. This does not mean that it cannot have status as a non-designated heritage asset. Previous assessment has concluded that inclusion of the property in the Nottinghamshire Heritage Environment Record supports consideration as a NDHA. 8.3 Objectors have secured independent professional advice commenting on this issue. 8.4 That advice notes that a key aspect of the property's setting and how the	The Applicant notes the concerns raised in relation to the potential impact on the identified property with heritage interest. The Order Limits do not include any designated heritage assets, with the exception of a small western parcel that falls within the outer edges of Maplebeck Conservation Area. There are no built heritage non-designated heritage assets within the Order Limits. The Development has complied with relevant planning policy by minimising harm to heritage assets through sensitive design and protecting as much of their significance as practicable during the life of the Development. An assessment of the likely significant effects of the Development on the designated and Non-Designated Heritage asset is provided in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054]. The ES concludes that there are not likely to be any significant effects to non-designated heritage assets.

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	nondesigned asset is experienced is that it can be appreciated in long ranging and wide aspect views through this rural area particularly from the east and south. Long range and wide aspect views from the property looking out across the countryside are also inherent to how it is experienced. The property is conspicuous in the countryside to any walkers' experience of the area when utilising nearby rights of way. The landscape setting of [redacted text] can be concluded to be intrinsic to its heritage interest.	In consideration of the above, this clearly demonstrates that the Development is in accordance with NPS EN-1, NPS EN-3 and the NPPF.
8.5 – 8.8	8.5 [redacted text] sits on a high point within the undulating open countryside. The property's curtilage is well defined by boundary treatments and within this curtilage is a well-maintained dwelling house of local vernacular construction (red brick and pantile) served by a tarmacked driveway and parking area. The house is accompanied by ancillary buildings and structures to its north side which include a small-scale wind turbine	Please refer to the responses above.

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	and solar panels. A small, enclosed garden area serves the house on its south side house but beyond this are large expanses of lawn to the east (including a pond), south and west. 8.6 [redacted text] has its origins as a residence and historic barn with the barn latterly converted into residential use c.1998 and the building subsequently extended. The red brick and predominantly pantile roof building now presents as a combination of historic and modern brick-built structures of a vernacular type. Where historic fabric survives in the west gable end of the barn it incorporates historic detailing in the form of vitrified headers stating the date '1796', assumed date of construction, along with cross shaped ventilation openings 8.7 The earliest six-inch OS maps dating back to 1884, 1900 and 1921 all identify and name [redacted text] it being an isolated farm within the farmed rural landscape between the small countryside	

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	settlements of Cauntton and Norwell Woodhouse. [redacted text] is a farm of historic provenance, established within the Nottinghamshire countryside for over at least 200 years, and contributes to the historic character of the area. [redacted text] has heritage interest as a non-designated heritage asset. 8.8 On this basis it is considered that the existing property can be shown to have significance as a heritage asset.	
8.9 – 8.13	8.9 In this context both the NPPF and NPS offer relevant advice. 8.10 The NPPF at Paragraph 216 requires consideration to be given to the effect of development on NDHA. 8.11 NPS EN-3 requires proposals for development to design proposals with impact on heritage in mind and specifically refers to the need to consider the impact of solar farms on the setting of heritage assets. 8.12 Paragraph 2.10.118 states: 'As the significance of a heritage asset derives	Please refer to the responses set out above.

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	not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design and prominence, may cause substantial harm to the significance of the asset.' 8.13 In this case it is concluded that the proposed solar park would have a direct and significant impact on the setting of the non-designated heritage asset that is This impact would cause substantial harm to the setting of this non-designated heritage asset, would be overwhelmingly insensitive, would overwhelmingly fail to make a positive contribution to setting and overwhelmingly fail to demonstrate good design contrary to Paragraph 2.5.2 NPS EN-3 and Paragraphs 5.9.13 and 5.9.25 NPS EN-1.	

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BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
<i>Compulsory acquisition and legal matters</i>		
9.1	9.1 Under Section 122 of the Planning Act 2008, CA powers require the land to be "required" for the development and a compelling public interest case, with all reasonable alternatives explored (DCLG Guidance 2013, paras 8-10). The Applicant has not met these tests for Title NT332979: the 11 acres of panels proposed are a minor spur off the main array, not indispensable-panels and perimeter access can be relocated or omitted, reducing the scheme by a negligible fraction without affecting viability, as evidenced by removals elsewhere (e.g., blocks 9-SR32 and 9-SR33).	The Applicant assumes that paragraph 9.1 of the WS is concerned with the proposals for Plot 15/16, seeing as this is proposed for work no 1 (solar PV). The WS seek the removal and/or relocation of the solar panels from this location. This is not possible because the design evolution of Work No. 1 has been designed to accommodate solar PV areas required to optimise the generating capacity of the Site, and make best use of the available grid connection. The overplanting ratio of 1.4 is already on the lower end of the scale of what would be considered optimal. The Applicant considers that there is no planning necessity for any further reductions. It should be also noted that solar areas around CLF have already been reduced on two occasions during the pre-application stage: Figure 4.8b, 8-SR57 [APP-077], showing the layout changes from Scoping to Preliminary Environmental Information Report (PEIR), demonstrates a reduction of the solar area to the south of the property following non-statutory consultation. Figure 4.9b, 9-SR33 [APP-079], showing the layout changes from the PEIR to the ES, shows reduction of solar areas to the west of the property which were associated with potential underground archaeology identified following the geophysics survey. Accordingly, a reduced scale proposal to the Development is not considered by the Applicant to be a reasonable alternative. This is because a smaller Development would not be capable of delivering the same generation capacity as the current proposal and would therefore not meet the Development

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
9.2 – 9.13	9.2 Review of s122 in detail shows that it sets two conditions to the inclusion of powers for compulsory acquisition when granting a DCO. The first of these is the onus upon the decision maker to be satisfied that the land is “required” for the stated purpose. Whilst relating to definitions within the Town & Country Planning Act 1990, the Court of Appeal decision relating to Sharkey and another v Sec of State for the Environment and South Bucks DC (1992) 63 P & CR 332 remains the leading case when considering the meaning of ‘required’. 9.3 The leading judgement concluded that in that case that the word ‘required’ meant ‘necessary in the circumstances of the case’. 9.4 Given that this objection focuses on the very specific impact of a very minor portion of the proposed development it is	requirements. This approach was endorsed in the Secretary of State’s decision letter for the Sunnica Energy Farm DCO (dated 12 July 2024). Paragraphs 9.2-9.9 of the WS go on to comment on the tests in section 122 of the Planning Act 2008 for the compulsory acquisition of land, however the WS fail to recognise (1) that the Rights do not comprise an interest in land to be compulsorily acquired/transferred to the Applicant, and (2) the potential for interference with private rights, such as the Rights, is not dependent on the authorisation of or exercise of compulsory acquisition powers. There are two articles in the Draft DCO [EN010162/APP/3.1C] which may authorise interference with the Rights within the Order Land: Article 25 (private rights over land), which permits the extinguishment of private rights over land within the Order Land. This is not a power to compulsorily acquire land but it operates when land has already been acquired, whether compulsorily or by agreement. As explained above, the Applicant has concluded an option agreement with the owner of Plot 15/16 and it is expected that the Applicant will enter into a lease of the land pursuant to the option agreement. Pursuant to article 25(1)(a), the grant of the lease will enable the extinguishment of private rights over land where necessary, and it is not a pre-requisite for the land to have been compulsorily acquired. Article 28 (Power to override easements and other rights), which does not rely upon the acquisition of land pursuant to the Draft DCO [EN010162/APP/3.1C], but permits authorised activities to be undertaken

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	impossible to see how the parcel of land at the core of that objection is required to enable the development to proceed. 9.5 The second condition which has to be satisfied relates to the need for a compelling case for the land to be acquired compulsorily. 9.6 It is not intended to argue that there may not be some level at which the public interest may be served by the delivery of additional solar energy provision. 9.7 It is however argued that in the context of identified harm, that there is no compelling public interest to justify acquisition of the land of concern in this case. Inclusion of the land would offer only marginal capacity gains from 11 acres with any minor benefit outweighed by local harm, including heritage erosion, amenity degradation, operational conflicts, and rights interference. 9.8 Useful guidance was published by the then DCLG in 2013. Although dated the advice remains relevant.	which may otherwise have been in breach of private rights. There is no requirement for the land to have been compulsorily acquired for this power to operate. Whilst the owners and occupiers of CLF benefit from the Rights, and the Rights do bind Plots 15/16, 15/17 and 16/1 of the Order Land, neither Mr Gill nor DDSL have provided information to enable the Applicant to assess what impact (if any) the powers in Article 25 or Article 28 could have on the Rights and/or whether that impact can be mitigated. No plans have been provided to indicate the location of any existing Service Installations. No proposals for any new Services Installations have been disclosed and no explanation has been given as to why the Services Installations (if there are any such lawful installations) could not be re-routed elsewhere, either in the Order Land or the remaining land burdened by the Rights. Should there be an impact that cannot be mitigated, compensation is payable to parties whose rights have been affected, such compensation to be assessed on the basis of the diminution in value of land as a result of the operation of the powers. Such compensation would not be payable to DDSL as it does own land which could be injuriously affected. It follows that there is no justification for the exclusion of Plot 15/16 (or Plots 15/17 or 16/1) from the compulsory acquisition powers in the Draft DCO [EN010162/APP/3.1C].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
	9.9 Having regard to compulsory acquisition it is noted that it is the responsibility of the Applicant to demonstrate that all reasonable alternatives to the CA (including modification to the scheme) have been explored. For the reasons outlined above it is concluded that the Applicant has failed to meet this obligation. 9.10 Guidance goes on to note that the Applicant will also need to demonstrate that the proposed interference in rights of those with an interest in the land is for a legitimate purpose and that it is necessary and proportionate. It is again demonstrated the compulsory acquisition in which the Objectors have an interest is neither necessary nor proportionate in securing public benefit. 9.11 The Applicant's scheme would erode the integrity of that easement framework, not merely affect its alignment. By extinguishing or sterilising a substantial proportion of the available easement corridors, the proposal would	

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	permanently reduce the robustness, redundancy, and adaptability that the easements were expressly designed to secure. In property law terms, this is not a minor or technical interference: it is a fundamental alteration of the quality and utility of the rights themselves. A right whose integrity is compromised-so that it no longer performs the function for which it was granted-is not being preserved in substance, even if some residual ability to pass services might theoretically remain. 9.12 The key point is that an express easement is a permanent property right whose value and protection do not depend on the extent to which it is currently exercised or on whether alternative servicing arrangements might theoretically exist. The relevant question for Section 122 purposes is therefore whether the Applicant's scheme would materially interfere with the integrity and utility of the easement as granted, and	

WR Ref.	Summary Position of Interested Party	Applicant's Responses
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	whether that interference is necessary and proportionate. 9.13 Guidance emphasises that public benefits must "strongly outweigh" private loss, favouring homeowners where alternatives exist (DCLG 2013, para 17). Insisting on inclusion of this parcel despite a sound basis for omission suggests acquisition for convenience, contrary to guidance. 9.14 Critically the guidance stresses that the use of alternative dispute resolutions is encouraged. The Applicant has shown no indication that this approach has been applied in this instance. 9.15 It is concluded that the case for CA of land adjacent to [redacted text] over which Mr Gill and DDS Ltd have rights through long established easements, fails to meet the requirements of both legislation and guidance.	

WR Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd [AS-078]		
<i>Conclusions on harm and the planning balance</i>		
10.1- 10.8	10.1 It is apparent from other submissions made in respect of the application that there is a considerable number of wider issues which introduce significant and cumulative harm which weigh heavily against the grant of consent of the Order. 10.2 The Objectors for whom this submission is provided do not attempt to consider the wider harm of the development, largely as a consequence of the complexity and depth of the issues involved. 10.3 It is apparent however that key parties engaged in the process, notably the County and District Councils continue to identify harm which arises from the development. 10.4 The County Council notes in particular: This LIR has identified several negative or inconclusive effects at this stage which NCC believes should be	The Applicant does not agree that the Development would give rise to significant or unacceptable cumulative harm that would weigh against the grant of consent. The Application has been informed by Environmental Statement which assesses effects both individually and cumulatively, and these assessments have been refined during the Examination in response to matters raised by consultees. The Applicant notes the concerns raised in the Local Impact Report. The Applicant has then provided further clarification and information where requested to resolve outstanding matters. The management plans have been continuously refined to ensure that any impacts raised (in relation to traffic and transport, flood risk, landscape and visual, biodiversity and agricultural land) would be appropriately mitigated. As stated in Section 2.15 of the Statement of Reasons [EN010162/APP/4.1] [APP-010], the inclusion of compulsory acquisition powers within the Draft DCO [EN010162/APP/3.1C] meets the requirements of Section 122 of the 2008 Act and the Compulsory Acquisition Guidance. All of the Order Land, including the proposed new rights and restrictive covenants over the Order Land are required for the purposes of the Development, to facilitate the Development, or are incidental to, the Development. All of the land subject to compulsory acquisition and temporary possession powers is necessary to construct, operate, maintain and decommission the Development. The extent of land within the Order Limits is reasonable and proportionate and is no more than is reasonably necessary.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
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	further addressed by the Applicant, through further assessment work, evidence and mitigation measures. The main areas of concern relate to impact upon traffic and local flood risk, which in our view have not been assessed to the required standard or adequately mitigated. NCC also remains concerned about the cumulative impact upon the local landscape and the loss of agricultural land arising from this proposal and other nationally significant proposals for ground mounted solar within the county, further evidence on which is covered in the NSDC LIR. 10.5 The District Council notes: Newark and Sherwood District Council (NSDC) note the need for Renewable Energy development and the wider benefits that this brings, but there are some specific and direct negative impacts associated with the proposed development including landscape and visual impacts, leading to a marked change in the character of the area and the loss of Best and Most Versatile Agricultural Land. In addition,	Turning to the planning balance, the Planning Statement [EN010162/APP/5.4B] demonstrates that the benefits of the scheme, particularly the delivery of new solar generating capacity, are overwhelmingly greater than the residual adverse effects. There is a clear and compelling case in favour of the DCO being made. The Development accords with the relevant NPSs which have effect. None of sections 104(4) to (8) of the PA 2008 apply. Accordingly, the application should be determined in accordance with the relevant NPSs by granting consent.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
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	there are impacts around the potential loss of trees, other areas of potential impacts and areas of mitigation that require further development during the examination, so as to clearly understand the means to which more significant impacts associated with the proposed development will be suitably mitigated, including the mechanisms to ensure this mitigation is fully implemented. 10.6 The Objectors represented here support these positions in terms of concerns relating to the wider impact and harm resulting from the proposed development. 10.7 It is clear from the submissions tabled that these global concerns are reflected as a more specific level in terms of the local harm to landscape and visual impact, harm to amenity, harm to a heritage asset and the threat that compulsory acquisition and development would cause to a successful local business.	

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	10.8 In this context and in line with Government advice the Objectors would at the very least seek modification to the development scheme to secure an acceptable balance of harm to public benefit and to resolve the clear contradiction of the requirements of S122 of the 2008 Act.	

4.23 RESPONSES TO COUNCILLOR BERT BINGHAM'S POST HEARING SUBMISSION

Table 4-21 Responses to Councillor Bert Bingham

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor Bert Bingham [REP1-111]		
<i>General</i>		
Para 4	<i>"There needs to be adequate consideration of any minerals that may be sterilised as such an industrial-scale development cannot be considered "temporary" in any true meaning of the word".</i>	The Applicant has set out a response to the raised in the Relevant Representation regarding this issue at Table 3-5 of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 35 The Applicant notes that a period of 40 years is a long time, but the DCO would not be permanent. As set out in Requirement 19 of the Draft Development Consent Order [EN010162/APP/3.1C], the Development is limited to operate for no more than 40 years. The DCO is therefore a temporary development. The Environmental Statement has then considered the length of the development in how effects have been taken into account. The Applicant considers that the Berden Hall Farm appeal⁵ provides helpful explanation in terms of the duration of solar projects and the objectives these projects are seeking to address. Paragraph 32 of that Appeal Decision notes that 'A period of 40 years is a long time in terms of the human lifespan. However, I would question whether that is the correct way to measure the duration of the proposal. Tackling the effects of climate change is not a short-term project. We are still some

⁵ Land at Berden Hall Farm, Ginns Road, Berden [PINS Ref: S62A/22/0006]
https://assets.publishing.service.gov.uk/media/669923f549b9c0597fdaffc1/S62A_22_0006_Decision_Notice_and_Statement_of_Reasons.pdf

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor Bert Bingham [REP1-111]		
		<i>way off 2050, when 'net zero' is meant to be attained, and it is fair to observe too that if/when 'net zero' is attained in 2050, it will need to be maintained thereafter. In simple terms, current generations are being asked to take action to address the impacts of climate change in their lifetimes, with the attendant impacts of those actions.</i>
Para 5	<i>The concentration in Nottinghamshire of so many ultra-large schemes and the cumulative impact across all areas of social, environmental and economic issues are of major concern to communities across the county, especially here.</i>	Cumulative developments have been considered as part of the environmental statement. The findings of the cumulative assessment are summarised in Table 4-5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], page 301 – 302. Further details on the cumulative landscape and visual effects are provided in Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].
Para 6	<i>The adverse effect on landscape, soils and ecology is also a source of significant anxiety for local people. Biodiversity Net Gain ("BNG") is now a statutory requirement on all developments in Nottinghamshire from November 2025, including for NSIPs</i>	The Development has undertaken assessments of landscape, soils, and biodiversity, which are provided below: • ES Volume 2, Chapter 7 LVIA [EN010162/APP/6.2.7A] • ES Volume 2, Chapter 8 Ecology and Biodiversity [EN010162/APP/6.2.8A]

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor Bert Bingham [REP1-111]		
		• ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] Measures to avoid or reduce the risk of adverse effects during construction, operation and decommissioning are secured in the following management plans: • ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B] • ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B] • ES Volume 4, Appendix 5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5B] • ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036] As stated at paragraph 1.6.62 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], “mandatory biodiversity net gain was introduced for most major developments in early 2024, but Nationally Significant Infrastructure Projects are not yet legally required to deliver biodiversity net gain and there is currently no

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor Bert Bingham [REP1-111]		
		guidance for such projects. However, biodiversity net gain is promoted by Overarching National Policy Statement EN-1 and National Policy Statement EN-3 and these policies also encourage environmental and biodiversity gains beyond those embodied in biodiversity net gain.” As such, the Development accompanies the BNG assessment Requirement 8 in Schedule 2 to the Draft DCO [EN010162/APP/3.1C] secures that The landscape and ecological management plan must include details of the extent to which the relevant phase contributes to ensuring that the authorised development overall achieves the BNG minimum of 60% biodiversity net gain in area-based habitat units, a minimum of 26% biodiversity net gain in hedgerow units and a minimum of 11% biodiversity net gain in watercourse units during its operational lifetime, using the Department of Environment, Food and Rural Affairs’ statutory biodiversity metric (version 1.0.3) to calculate those percentages.
Para 7	<i>Our Local Nature Recovery Strategy (“LNRS”) will help to prioritise the location of off-site BNG projects to ensure these are strategically located and deliver maximum benefits for nature recovery. All applicable projects must deliver a minimum of 10% and a target of 20% BNG from November 2025 with both off-site and significant on-site gains to be legally secured for 30 years.</i>	The Draft Local Nature Recovery Strategy (LNRS) has informed (and is cited in) ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A]. The Development is currently exempt from mandatory Biodiversity Net Gain (BNG) but it is anticipated that it will exceed the minimum 10% gain required by law for other types of development. Nottinghamshire County Council has set 20% net gain as an aspirational target, but the County Council and Newark and Sherwood District Council both require only 10% as the minimum gain.

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Councillor Bert Bingham [REP1-111]		
Para 8	Food security is a paramount consideration in schemes of this scale, together with the supply chain. A local sugar factory is supplied with beet from this land, for example.	The Applicant has set out a response to the raised in the Relevant Representation regarding this issue at Table 3-5 Responses to Relevant Representations [EN010162/APP/8.16A] , on page 37.
Para 9	The risk of fire in the battery plants is high and the potential for associated contamination of air, land and water must be carefully considered.	The Applicant has set out a response to the raised in the Relevant Representation regarding this issue at Table 3-5 Responses to Relevant Representations [EN010162/APP/8.16A] , on page 38.

4.24 RESPONSES TO JONATHAN DREW AND SALLY DREW'S POST HEARING SUBMISSION

Table 4-22 Responses to Jonathan Drew

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
Principle of Development		
Page 1	"We just do not understand the logic of which this has been formed and how this snowball effect has happened. Its millions of solar arrays we are now looking at which wipes out so much local land and our beautiful countryside will become an industrial dumping ground. We are concerned about misinformation as on the local news it was reported thousands of solar arrays, this is not correct its millions across our whole area. How much room is at the grid? Our farmers need supporting and food security should be protected. All in all it's just so distressing and causing huge mental health issues for our family. Particularly as we will be surrounded. There is no getting away from the arrays."	Concerns regarding location of development and site selection are noted and a response was provided within Table 4-11 Principle of Development Responses to Relevant Representations [EN010162/APP/8.16A], on page 327. Paragraph 7 of Statement of Need [EN010162/APP/7.2] [APP-324] suggests that "<i>The British Energy Security Strategy stated that in 2022 the total installed solar capacity in the UK stood at approximately 14GW - a five-fold increase is approximately 70GW of solar power, meaning another 55GW of new solar power was needed, as per the 2022 figures.</i>" As such, the Development would make a significant contribution to meeting government objectives and is therefore compliant with national legislation and policy.

Consultation

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
Page 2	“This has been done by way of GNR displaying maps in village halls of affected areas with what we would call “tokenism” answers to our fears, worries and concerns. Leaflets have been posted through to us but in “having our say” this has not been adhered to. For example, looking at site proposals why could a representative not come to us and look at what will surround us, the impact can clearly be seen. What we felt was that the decision was already made and that this was what was happening to the areas in which we love and live! We are meant to live in a democratic society and we have found it so difficult to become engaged in any of this process. We have submitted worries electronically to GNR and heard nothing back. We have done the same to councillors, MP’s and nothing! Concerns have been raised so many times and these have not been addressed to help make residents feel more secure. We ask the inspectorate look at the impact on local residents.”	Please refer to the Applicant’s responses to the issue of ‘Consultation’ within Table 4-5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], page 303. The Examination provides a further opportunity for concerns to be formally considered by the Examining Authority and the Secretary of State. The public will also have an opportunity to participate in the hearings in February.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
Page 8	"As residents we feel that the GNR project is being discussed as though its already got the go ahead and this has been the impression from the start even with the initial consultation. The localism act clearly outlines that councillors should assist with aiding discussions. We have not heard from or been aided by local councillors let alone open up a democratic debate, rather a pushing through approach whereby people feel that they are not being heard, listened to. Rather that they should roll over and accept this ruthless plan to create an industrial landscape, that not only reduces food production but will have a bigger impact on flooding and will affect people's mental health in the long run." "The Localism Act we feel needs further consideration."	Noted
	"On Newark and Sherwood Council's statement on planning applications there are 6 considerations stated: • road safety • effect on character of the area	Please see the responses above at page 351

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	• effect on the landscape are all what we are concerned about and need an open forum in which to discuss such concerns. This is why we live in a democratic state. Millions of solar arrays are clearly going to cause a negative impact on all the above. There must be opportunity for residents to be spoken to as a community group and not in isolation through drop in sessions.”	
<i>Health, Safety and Security</i>		
Page 2	“We know that flooding is a huge concern and this needs a real focus along with the impact on resident’s mental health. We feel that we need to leave our home that we have renovated and worked so hard on, as being surrounded by solar arrays is affecting our mental health and we did not move to an industrial landscape of which this may now become.”	Key determinants to the protection of human health, including mental health aspects associated with changes to amenity as a result of the Development⁴⁴, have been considered as part of this HHIA. The outcome of the HHIA indicates that the Development is unlikely to negatively affect people’s health and wellbeing in its widest sense. The Applicant has responded to the concern raised on health in Table 4-7 Health, Safety and Security of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 307. In terms of flooding, ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052] and ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039] demonstrate that the Development will be safe, without increasing flood

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
		risk elsewhere, and will reduce flood risk overall given the reduction in surface water runoff following redevelopment.
Page 9	“Whilst the developer will state that there is no proof that solar farms and equipment will cause problems to health there is no proof it will not. It’s a relatively new option in green energy and the impact will not be understood for years. The general consensus is arrays should ideally be 500m to a 1 mile from residential properties. This would not be stated if there were no risk to residents.”	The Applicant notes the comments on the visual impact on residential properties, and therefore affecting people’s health. This has been responded to at the rows below, at page 363. To reiterate, the Development has been designed to include setback from the residential properties, and the Concept Design Parameters and Principles [EN010162/APP/7.14B] secures that construction compounds will be located at least 300m from residential properties.
Page 9	Electromagnetic fields in low levels suggests it should be safe. However, what is the impact on large solar farms and on having a combined energy sources in close proximity, so wind farm, electricity pylons and solar farms. All of which are located in Knapthorpe and Muskham. Also, the size of the farm and proximity to other power sources has potential issues in harmonic	Grid connection agreements and inverter specifications are regulated through the electricity network operator. As such, it is not expected to result in environmental, social, or economic harm. No significant effects are anticipated on telecommunications, television reception and utilities as a result of the Project, so no additional mitigation is required. As stated in Table 4-7 Health, Safety and Security of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 307, fire risk

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	distortions which for example, can cause electrical equipment to overheat. They can also cause interference with communication systems and reduce efficiency of electrical equipment. Further investigations should be sought as this could have a significant impact on the area environmentally, socially and economically. For example, our current phone signal and Wifi are weak. Issues with fire and how easily this can spread.	has been assessed as part of the Development's design and would be managed through appropriate layout, equipment standards, access arrangements, and an operational management plan. This is secured in ES Volume 4, Appendix A5.4: Outline FSMP [EN010162/APP/6.4.5.4A] [REP1-032]
<i>Ecology and Biodiversity</i>		
Page 2	"...the wildlife that surrounds us will be greatly impacted. We are guests in their garden and these arrays will cause huge distress on them. For example we have owls that use these fields for food and the arrays will impact their hunting ground."	The Development is accompanied by a suite of management plans to avoid or minimise any adverse environmental effects on protected species. The Applicant has set out a response to issues raised relating to the effects of protected species from the Development at Table 4-2 <i>Ecology and Biodiversity</i> of Responses to Relevant Representations [EN010162/APP/8.16A] , on page 278.

Cumulative Effects

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
Page 3	"We are writing to object and express our concerns regarding the above planning applications and the cumulative impact that the HUGE solar park AND all the other proposed solar sites and already established sites that they collectively will have on our agricultural land supply and our village homes. On maps provided by GNR they show just GNR plans but as you plot further existing and future proposals the cumulative impact is quite unnerving and quite frankly terrifying. I would advise that GNR representatives plot ALL solar farms that have been given permission from Jan 26 to show the actual impact that just GNR's 1.5 million panels, as well as others such as Eakring, Halloughton, Bilsthorpe, Knapthorpe, Muskham to name a few have all together."	Cumulative developments have been considered as part of the environmental statement. The findings of the cumulative assessment are summarised in Table 4-5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A], page 301 – 302. Further details on the cumulative landscape and visual effects are provided in Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].
Page 3	"If we take LINK 6 of GNR map (Please see attached photo 1) for our own private residence there is GNR solar that is plotted and that wraps around our home... In the addition of the above proposals by SSE that will mean that we would be completely surrounded (see highlighted proposed other	These comments are noted. Please refer to the section 'Landscape and Visual' at the rows below for the Applicant's responses.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	solar farm). We ask that solar plans be removed from surrounding residential properties in our villages... We notice that various changes have been made to all other areas where solar is proposed but not at Knapthorpe. As we look out of our front and rear windows we have rolling countryside, we ask that this be reviewed. It's too close to residential properties."	
Page 3	"We have been informed that the GNR project will mean that there will be no more room at the grid? If this is the case why are there many other proposals being applied for? The cumulative impact needs to plot all these to check what capacity is back at the grid! RWE Carbon Capture Project is now being proposed so residents need to understand what this is and how all the solar impacts this too, cumulatively and power back to the grid."	The connection of the Development to the electricity grid is managed by the National Energy System Operator (NESO), who ensure that any connection is technically feasible.

Flood Risk, Drainage and Water

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
"On link 6 of the map for Caunton Road recent flooding and (see photos) we own the front verge in front of our wall where there is a grass verge. It is relatively narrow at this point and is the side of and our front wall. There is nowhere to create a pull in for heavy goods vehicles, there is not room for 2 larger vehicles to pass safely and the verge is eroding closer and closer to the wall. There has been flooding which has prevented access to vehicles and is dangerous. When Kelham bridge closes due to flooding, the traffic diverts through our road. In needing access through either Hockerton Road or Caunton Road it would be dangerous due to huge increase in traffic needing to get through. These are the facts of Hockerton through to Caunton Road and is not accessible for constant have good vehicles. Flooding is a severe issue and surely this will become worse as fields would not be used for crops that help bind the soil and the solar arrays would just act as a runway for water."	The Applicant notes the comment on construction traffic and flooding on Caunton Road and Hockerton Road. The potential impacts of the Development on traffic and access have been assessed in the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14A]. Construction traffic would be managed through a Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2B]. An assessment of flood risk is provided in ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039]. The Development will incorporate planting and land management measures (RSuDS) which will reduce the potential for an increase in surface water runoff rates, which will be managed through the set of management plans. As such, the assessment concludes that access can be undertaken safely without giving rise to unacceptable risks to road users or local residents, and the concerns raised have been addressed through design and mitigations.	

Ecology and Biodiversity

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
Page 4	“Woodland Trust state that “Ancient Woodland” is truly unique as they are the richest and most complex terrestrial woodland in the UK and are home to more threatened species than any other. Centuries of undisturbed soils and accumulated decaying wood have created the perfect place for communities of fungi and invertebrates. Other specialists species of insects, birds and mammals rely on ancient woodlands. 1.5 million solar arrays plus the cumulative impact of already established solar will inhibit wildlife. The cumulative impact of all solar farms plus GNR solar park will have a detrimental impact on the wildlife that live around the area and need to travel between woodlands to access more food. “	The comments in this row and the row below, relating to the biodiversity impacts on ancient woodland and wildlife are noted and have been fully responded to by the Applicant in Table 3-10 Responses to Forestry Commission of Responses to Relevant Representations [EN010162/APP/8.16A], from 83 to 92. To reiterate, Woodland and trees are identified in ES Volume 4, Appendix A8.12: Arboricultural Impact Assessment (AIA) [EN010162/APP/6.4.8.12] [APP-225] and ES Volume 4, Appendix A8.3: Habitats and Vegetation Baseline [EN010162/APP/6.4.8.3B]. Effects on these features are assessed in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8A] The Development has been designed to avoid or reduce the risk of adverse effects on woodlands during construction. Measures are provided in section A5.3.11.3.2.1 of ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3B].
Page 5	“Having fences surrounding solar does not help wildlife navigate effectively for example deer (See screenshots of 3 red list endangered birds regularly in Knapthorpe). These being Skylarks, Greenfinch, Chaffinch). We have resident owls that feast	See responses immediately above. To reiterate, The principal way in which the free movement of animals will be facilitated is through the fencing design which is described ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048]. Fencing is shown in the Illustrative Design [EN010162/APP/2.10] [APP-029]

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	the fields too so what will be the impact on these beautiful birds.”	
	“The A46 Preliminary Environmental Study stated: 8.6.25 <i>The Knapthorpe Village and Farmlands with Ancient Woodlands PZ is characterised by a gentle undulating topography set to a mix of intensive arable fields with well managed hedgerow and areas of lower intensity permanent improved pasture. Landscape pattern is coherent and there are a small number of detracting features such as the A616 and A617. Farmland is interspersed with numerous blocks of mixed deciduous woodland along with hedgerows that lead to moderate visibility. Landscape condition is considered to be “very good” and the sense of place “moderate”. This leads to a moderate landscape sensitivity overall.</i> 8.6.26 <i>The landscape analysis concludes the need to “conserve” landscape features. This includes conserving and maintaining historic</i>	Please refer to the section ‘Landscape and Visual’ at the rows below.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	<i>field patterns (Historic England, Field Systems, Prehistoric origins), hedgerows and blocks of woodland.</i> It describes how the landscape in the area itself is uninterrupted, solar arrays will interrupt this completely. How will a huge solar park impact the landscape in terms of its beauty and benefit to local residents' health (mental and physical)?"	
Page 6	"The huge amount of solar arrays GNR anticipates 1.5 million) that will be erected on huge sites (0.4 - 4 meters in height) is not in keeping with the countryside by means of sight, sound, touch and the benefits on local communities. It has been suggested that sheep can graze underneath however has this been piloted anywhere as a recent report in Farmers weekly was that a farmer had a small solar farm and they have found it extremely challenging in herding the sheep under solar arrays? That these arrays require gaps and for these to be raised higher to allow sheep to navigate the arrays. In raising these higher this will have an even more detrimental impact on the landscape.	The comment on sheep grazing is noted. Please refer to Table 4- 8 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 314. The Applicant is in discussion with Nottinghamshire Wildlife Trust regarding the sheep grazing regime, and the latest position is set out in Draft Statement of Common Ground with Nottinghamshire Wildlife Trust [EN010162/APP/8.11] [REP1-060].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	Has GNR got a proven track record of sheep herding under solar, the grass also needs to be of good quality for sheep to feed? We are unsure as to whether this will actually work, let alone go ahead. On all other solar in our area there are no sheep grazing and very little growing beneath these and the arrays actually block the sunlight."	
Page 10	The Habitats Regulations 2017 To protect European Protected Species (EPS) Protect habitats that are valuable to them. Deer (Protected under the Deer Act 1991) have been seen on numerous occasions running across the proposed sites, likely to be accessing cover to the ancient Woodland. Having a solar farm with high fences will likely cause injury or death, in needing to negotiate round such fencing or even being pushed on to the roads. Skylarks habitat, they need to see any prey that maybe approaching. Solar causes huge issues for them. Leisler's bats (Countryside Act, 1981), they leave shortly before sunset (glint and glare is greater at this time), return shortly before sunrise (again glint and glare	See above.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	is greater at this time) Lesser spotted woodpeckers and their affect with solar noise/glint and glare near to the ancient woodlands.	
Landscape and Visual		
Page 5	"We live on x which is the connecting B-road from Hockerton to Cauton. It is the only road that directly connects these villages and the proposed solar arrays are all the way along this road. Therefore, they will be a constant view for all residents and totally affect the landscape in which we choose to live."	The Applicant acknowledges the concern regarding views from the B-road connecting Hockerton and Caunton. The ES Volume 2, Chapter 7: Responses to Relevant Representations [EN010162/APP/8.16A] [EN010162/APP/6.2.7A] considers the visual effects on users of this route as part of visual receptor group B. As illustrated by Figures 7.6 and 7.7 in ES Volume 3 [EN010162/APP/6.3.7A] [AS-035], there would be Medium scale, Adverse changes to views from this route during construction and early operation for approximately 1km of the road where the Proposed Development would be seen above the existing roadside hedges to the south of Knapthorpe. There will also be views of the consented solar farms adjacent to the route to the north of Knapthorpe. Once roadside hedges have increased in height, effects arising from GNR would reduce to Negligible. Whilst on plan, some settlements may appear to be 'surrounded', the design is set back from villages where proximity would lead to open and close views (see Table 7.3 in ES Volume 2, Chapter 7: Responses to Relevant Representations [EN010162/APP/8.16A] [EN010162/APP/6.2.7A] and takes advantage of natural screening by terrain and vegetation. As a result significant effects on settlements would be avoided as confirmed by the assessment as

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
		summarised in Tables 7.6 and 7.7 in ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] .
Cumulative		
Page 6	"SSE have a proposed 2 solar farms along the same road Knapthorpe Solar and Muskham Solar. They are across the road, we believe are the same landowners and should be classed as 1 solar farm project not 2. If they were classed as 1 project the amount of arrays would mean they would need the planning inspectorate to look at this. We feel this is illegal and Newark and Sherwood council agreed this too and refused it. We would ask the planning inspectorate investigate this as the cumulative impact as massive in Knapthorpe and Caunton."	The Applicant notes the comment on cumulative impact, particularly in the area of Knapthorpe and Caunton. Responses have been provided in the Responses to Relevant Representations [EN010162/APP/8.16A] to address these concerns, within Table 3-21 <i>Responses to Nottinghamshire Area Ramblers</i>, at page 156. Kelham solar farm is now consented and found to be acceptable in planning terms.

Land Use

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
Page 6	"Acres of arable farmland that produces Oil Rape Seed, Grains, Sugar beet wiped out for 40 plus years."	Please refer to the Applicant's responses to Councillor James Gamble above, in Table 4-5, <i>Responses to Councillor James Gamble</i> (pages 189–190), with row references to Sections 3.2/ 3.3 / 4.3.
Page 6	"There are also much better sites such as housing solar panels on the roofs of housing estates, car parks, factories and commercial buildings (CPRE Campaigns). The possibilities are endless but much more logical and with less an impact on our countryside and the ability to produce food." "The planning inspectorate should ask that statistics be based on "local" impact and not a national one. The climate is indeed changing and with this national agricultural farmland may have issues due to the climate, so why would we wipe out other agricultural land. We need to protect this to ensure that food production can continue and farmers are supported to continue their essential work. We are a growing population and wiping out BMV land for 40 years when we live on an island just seems very naive to	The Applicant notes the concerns on the Applicant's approach to site selection, particularly on the use of agricultural land for solar and the need to seek for alternatives. Responses have been provided in the Responses to Relevant Representations [EN010162/APP/8.16A] to address these concerns, within Table 3-1 <i>Responses to Bathley Parish Council</i>, at page 10. These concerns have also been discussed and are summarised in Section 1.4 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	us. The power of wind, an endless supply of power not just when the sun shines!!"	
Page 7	"The land has been graded as a proportion that is 3a (very good quality) and a majority of the land is Grade 3b."	See above.
Page 7	"In the latest Archaeological Evaluation that is stated on the planning application of Ref 22/00975 a total of 245 trenches have been opened which appears to be very significant as it covers the whole site. These trenches have received an archaeological assessment. As the evaluation reads on it states: <i>1.2 "Slightly acid loamy and clayey soils permeable, seasonally wet, slightly acid but base rich and loamy and clayey soils"</i> On definition rich loamy and clayey soils means the soil is very fertile compared to other types of soil. With the soil being very fertile then this soil should be protected and therefore development not prohibited (Planning and solar farms, July 23)"	The Applicant notes the reference to the archaeological evaluation undertaken ES Volume 4, Appendix A11.1: Archaeological Desk-Based Assessment [EN010162/APP/6.4.11.1] [APP-251] [APP-252] [APP-253] [APP-254] and the description of soil types recorded during that work. The archaeological evaluation was carried out to assess the presence and significance of archaeological resource and is not an assessment of agricultural land quality. Table 3-8 <i>Responses to Eakring Parish Council</i>, at page 51, of the Responses to Relevant Representations [EN010162/APP/8.16A] further details the Applicant's response to the matter on soil degradation.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
Page 7	"Once the agricultural land stops being cultivated and left unused for years it then takes on another form whereby it would take great expense and time to get that soil back to being used for agricultural land. Therefore, highly unlikely to return to food production."	The Applicant has set out a response to the raised in the Relevant Representation regarding this issue at Table 4-5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] , at page 285
Page 9	"How will they be disposed of and is it worth it for something that works 40% of the time. We are not a country or area of the UK that benefits from sunny days and in 2023 the Uk had an average of 4.3 hours a day of sunshine! (Statista 2025, Energy & Environment, Climate and Weather)"	See above.
<i>General</i>		
Page 9	"There is also the issue of morals with regards to where these solar arrays will come from...Producing 1.5 million solar arrays for GNR over in China and shipping these to the UK creates CO2 omissions so it merely looks like we are offsetting one with the other. There are concerns for how these are being made e.g. child labour and ultimately with disposing of these arrays as	The Applicant has set out a response to the raised in the Relevant Representation regarding this issue at Table 4-5 <i>General</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] , at page 285.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	they have a 15 - 20 year lifespan. This in itself is not "Green" and offers more issues in the future."	
Page 9	Millions of solar arrays to be disposed of is our problem now as we must have a clearly defined policy for any companies when it comes to decommissioning these. This must be done in a safe and "green" way. We have not got the capability to recycle the elements of solar arrays at this time. What also concerns us is who will be responsible for the big clean up? What we already know is that companies change hands all the time and are sold off. If this is the case then who will be responsible for the decommissioning if the company no longer exists?? Will this be the landowner?? What if the landowner cannot afford the big clear up? This will mean defunct arrays are left degrading into the soil and as noone takes responsibility for the decommissioning. This in itself is not	Please see the Applicant's responses to the concerns raised in relation to decommissioning at Table 4-21 Responses to Jean Johnson's Written Response of the Report above, on page 295.

WR Ref.	Summary Position of Interested Party	Applicant's Responses
Jonathan Drew and Sally Drew [REP1-119] [REP1-129]		
	biodiverse but a huge problem for our climate."	
Cultural Heritage		
	Ancient Monuments and Archaeological Areas Act, 1979 7.2.3 This act relates to the investigation, preservation and recording of matters or archaeological and historical interest. The scheme could have potential effects on scheduled monuments and important archaeological deposits. In the latest archaeological report there have been "deposits": found that appeared to be pottery shards dating to Romano-British period (predicted AD 43). Surely this area should be considered as a potential site for archaeological digs and therefore, requiring access if needed. The site is near to Earlshaw Hall Moat (1008628) Moated site, fishponds and decoy pond (1018120) Newbottles plantation, walking area.	The Applicant has set out a response to the raised in the Relevant Representation regarding this issue at Table 4-3 <i>Cultural Heritage and Archaeology</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 285.

5 WRITTEN REPRESENTATION – THEMATIC RESPONSES

5.1 OVERVIEW

Written Representation

5.1.1 Written Representation that have been submitted by IPs not included above have been arranged by topics raised within the Written Representation and then responded to in a thematic way below. This is not intended to underestimate the importance of the matters raised but responding to the representations in this way provides an accessible and informative response to the representations raised whilst avoiding excessive repetition.

5.1.2 This report summarises the thematic issues identified along with the Applicant's response. In some cases, it has been appropriate to respond to multiple issues with a single response.

5.1.3 Responses have been prepared for the following themes:

- Ecology and Biodiversity;
- Cultural heritage and Archaeology;
- Flood Risk, Drainage and Water;
- General;
- Health, Safety and Security;
- Land Use;
- Landscape and Visual;
- Noise and Vibration;
- Principle of development;
- Public Rights of Way (PRoW);
- Socio-economics, Tourism and Recreation; and
- Traffic and Access.

Written submissions of oral cases and comments on relevant representations

5.1.4 Post-hearing submissions from Category 3 Stakeholders, including written summaries of oral cases and comments on Relevant Representation, to which the Applicant wishes to respond, have also been considered in this Section.

5.1.5 The Applicant has responded to the following Post hearing submissions

- REP1-115

- REP1-130
- REP1-132

5.2 ECOLOGY AND BIODIVERSITY

Table 5-1 Ecology and Biodiversity

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-137 REP1-107 REP1-108 REP1-113 REP1-123 REP1-125	Wildlife Impact and Habitat Loss: Concerns raised about how the Development and the fencing around solar farms will cause harm to the wildlife. Concerns raised that the Development is completely incompatible with the strategy, objectives and priorities of the Nottinghamshire Local Nature Recovery Strategy.	Please refer to Table 4-2 Ecology and Biodiversity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 276 . In relation to the Draft Local Nature Recovery Strategy (LNRS), it has informed (and is cited in) ES Volume 4, Appendix 8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13A]. Section A5.1.3.2 in ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B] explains how the final LNRS will be considered in the final designs. Please refer to Table 3-29 Responses to South Muskham & Little Carlton Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 236.
REP1-107 REP1-108 REP1-113 REP1-115 REP1-123 REP1-125 REP1-137	Construction Effects: Concerns raised about the construction impact of the Development on the wildlife habitat and the wildlife movement.	Please refer to Table 4-2 Ecology and Biodiversity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 278.
REP1-137 REP1-107 REP1-108 REP1-123	Protected Species: Concerns raised about the potential impact of the Development on species such as include lapwing, tree sparrow, skylark,	Please refer to Table 4-2 Ecology and Biodiversity of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 278.

IP's Ref	Summary Position of Interested Party	Applicant's Responses
	starling, linnet, fieldfare, barn owl, brown hare, buzzard, kestrel, red kite, bats in Eakring, and water vole and kingfisher along the Caunton Beck adjacent to Field DB018. Concerns have also been raised regarding potential impacts on the rare barbastelle bat.	

5.3 CULTURAL HERITAGE AND ARCHAEOLOGY

Table 5-2 Cultural Heritage and Archaeology

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-107	Settings of Heritage Assets: Concerns raised about the impacts to Eakring Conservation Area and its associated heritage assets. The Church of St Andrew is Grade II* while there are four additional domestic properties with Grade II listing. There are designated finds in Eakring: • Fish Ponds which are close to Field DB016, • A terraced above ground feature in the Village, • An enclosure at Eakring a below ground feature within Field DB013, • On the boundary of Field DB015 a below ground sub rectangular enclosure	The Applicant's responses on the effect on the designated heritage assets and the setting of heritage assets is provided in Table 4-3 Cultural Heritage and Archaeology of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 283. Changes within the setting of Eakring Conservation Area and the heritage assets within it are assessed at paragraphs 235 to 244 of ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054]. The assessment concluded that the Development will not harm any aspect of the Conservation Area which contributes to its character or appearance or its special interests through change within their setting. Eakring Conservation Area and any archaeological remains present within it will be subject to direct physical impacts as a result of the project.

IP's Ref	Summary Position of Interested Party	Applicant's Responses
	• Ridge and furrow, Banks and Features at Mansey Common and Dukes Wood. The Woodland Trust have recorded two Ancient Trees of significance in Eakring. One in the church yard of St Andrews the other on the entrance track to Field DB017. The scheme could have potential effects on scheduled monuments and important archaeological deposits. The site is near to Earshaw Hall Moat (1008628) Moated site, fishponds and decoy pond (1018120) Newbottles plantation, walking area.	

5.4 FLOOD RISK, DRAINAGE AND WATER

Table 5-3 Flood Risk, Drainage and Water

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-123 REP1-124 REP1-133	Flood Risk (including surface water): Concerns raised that Nottinghamshire's Trent Valley is prone to flooding, with villages like Carlton on Trent and Sutton on Trent enduring repeated inundations. Moorhouse Beck is prone to flood risk.	Please refer to Table 4-4 Flood Risks, Drainage and Water of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 287 ⁶ . Appendix 1 of the Planning Statement [EN010162/APP/5.4B] demonstrates that there are no suitable and reasonably available sites appropriate for the Development in areas with a lower risk of flooding.
REP1-124 REP1-133	Assessment methodology: Raised concerns that that the flood risk assessment relies on over-generalised, desk-based assumptions about slope, soils, and drainage, and fails to account for local context. The flood risk analysis of the Moorhouse area is conceptual and incomplete.	ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039] has been prepared by a chartered water and environmental manager with over 18 years' experience working on large scale renewable energy schemes such as Cleve Hill Solar DCO, Longfield Solar DCO, Mallard Pass DCO and The Drovers Solar DCO, and in accordance with best practice assessment methodology. 2D modelling has been undertaken using best practice techniques to verify national flooding datasets and to corroborate anecdotal feedback on areas of flooding on proximity to the Development, including feedback from various consultation events and forums specifically to discuss flooding in Maplebeck, Sutton-on-Trent, Egmanton, and South Muskham.

⁶ Please note that the **Responses to Relevant Representations [EN010162/APP/8.16A]** refers to the Sequential Test in Appendix C of the Flood Risk Assessment; however, this appendix has since been removed. The most recent Sequential Test is now appended to the **Planning Statement [EN010162/APP/5.4B]**.

IP's Ref	Summary Position of Interested Party	Applicant's Responses
		It is acknowledged that Moorhouse has previously flooded and feedback from the consultation events in January 2025 fed into the design of the Development, where Solar PV was removed from Flood Zones 2 and 3 along Moorhouse Beck. It should however be noted that the Environment Agency Risk of Flooding Surface Water Map shows prominent surface water flood pathways originating from land around Laxton and Egmonton Wood, which then flow towards Moorhouse. These areas are outside the Order limits and therefore the Development is not within the upper reaches of the catchment which contribute to the flooding issues within Moorhouse. As shown in Plate 9.2 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052], clay soils draining to Moorhouse Beck are compacted by agricultural processes for parts of the year leading to turbid runoff quickly reaching the watercourse. As outlined in ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039], extensive grassland planting will cover the ground surface of the entire PV array areas managing any surface water runoff generated from the PV arrays. The use of grassland and wider vegetation planting within and around the PV arrays provides a significant betterment than the existing agricultural scenario and as a result will not increase surface runoff.
REP1-124 REP1-133	Mitigation: Concerns raised that riparian planting on the flood plain would exacerbate flood risk.	As shown on Figure 5.2 (6) Sheet 6 of 9 of ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1B], blocks of proposed woodland have largely avoided Flood Zone 3, with only ecotone and grassland proposed for these areas.

IP's Ref	Summary Position of Interested Party	Applicant's Responses
		It should be noted that there are substantial areas of enhancement and mitigation (Work Area 3) upstream of Moorhouse which will act to slow flows reaching Moorhouse Beck and therefore provide a beneficial effect on flood extents / depths, in accordance with the EA's "Working with natural processes to reduce flood risk 2024" FCERM research report (December 2024) and Woodland management research (February 2025). As such, the Development will not exacerbate offsite flood risk.

5.5 GENERAL

Table 5-4 General

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-113 REP1-125	Compliance with the local policies: Concerns raised that the proposed development contradicts the strategy and priorities of the Draft Nottinghamshire Local Nature Recovery Strategy (LNRS) and the policies of the Newark and Sherwood Local Development Framework: Solar Farms of July 2025	Please refer to Table 4-5 General of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 292.

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-125	Impact on residential property values: Concerns regarding potential impacts on residential house prices.	Please refer to Table 4-5 General of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 293.
REP1-108	Decommissioning timing and arrangement: Concerns raised about the decommissioning process and the recycling and disposal of panels throughout the Development's cycle.	Please refer to Table 4-5 General of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 293.
REP1-113 REP1-125	Waste: Concerns that solar panels contain toxic heavy metals, and improper disposal of solar panel waste can lead to soil and water pollution, as well as the release of toxic gases during incineration.	Please refer to Table 4-5 General of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 294.
REP1-107 REP1-113 REP1-123 REP1-125	Consultation: Concerns were raised about the adequacy of community consultation, noting that the developer did not actively engage with local residents.	Please refer to Table 4-5 General of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 303.

5.6 HEALTH, SAFETY AND SECURITY

Table 5-5 Health, Safety and Security

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-113 REP1-124 REP1-125	Major Accidents or disaster: Concerns about the risk of fire and associated impacts from the BESS and other components of the Development.	Please refer to Table 4-7 of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 306.
REP1-107 REP1-113 REP1-123 REP1-125 REP1-137	Impacts on health and wellbeing: Concerns that the effects of solar farms and the associated electrical equipment i.e. the loss of amenity value of the countryside would result in psychological and physical impacts on the residents.	Please refer to Table 4-7 of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 306.

5.7 LAND USE

Table 5-6 Land Use

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-107 REP1-113 REP1-125 REP1-115 REP1-123	Loss of high quality farmland: Concerns about the temporary and permanent loss of high quality agricultural land and the use of farmland for solar panels. This includes the fields in Eakring.	Please refer to Table 4- 8 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 306.
REP1-136 REP1-137	Food security: Concerns raised about the impact of agricultural land loss would reduce food production levels. Farm businesses will be affected.	Please refer to Table 4- 8 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 331.
REP1-131	Livestock Grazing: Concerns about the feasibility and effectiveness of sheep grazing beneath the panels.	Please refer to Table 4- 8 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 314. The Applicant is in discussion with Nottinghamshire Wildlife Trust regarding the sheep grazing regime, and the latest position is set out in Draft Statement of Common Ground with Nottinghamshire Wildlife Trust [EN010162/APP/8.11] [REP1-060] .

5.8 LANDSCAPE AND VISUAL

Table 5-5-7 Landscape and Visual

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-107 REP1-122 REP1-122 REP1-125	Landscape Character Impact: Concerns that the Development will harm the setting of the attractive countryside and historic villages.	Please refer to Table 4- 9 Landscape and Visual of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 316.
REP1-113 REP1-120 REP1-122 REP1-137	General Visual Impact and cumulative sequential impact: Large-scale solar farms can have a significant visual impact on the local area, and that the Landscape and Visual Impact Assessment understates the real effect on people who experience the landscape dynamically while walking. Concerns are also raised about the loss of landscape openness and visual amenity associated with the former Ossington airfield.	The Applicant's responses to the matter raised on the visual impact is provided at Table 4- 9 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 320. The responses to the Ossington Airfield is provided at Table 3-24 of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 176.
REP1-122 REP1-137	Visualisation viewpoints: The developer has chosen strategic viewpoints which show the least visible impact rather than the views most impacted.	Please refer to Table 4- 9 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 320.

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-113 REP1-122 REP1-125 REP1-123	Cumulative impact on landscape character: Concerns raised that the landscape would become dominated by panels and energy infrastructure in “in-combination” views.	Please refer to Table 4- 9 Land Use of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 322. The Applicant has provided a technical note which addresses the approach that an Applicant should take to the assessment of cumulative landscape and visual effects, which is presented in Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].

5.9 NOISE AND VIBRATION

Table 5-8 Noise and Vibration

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-113 REP1-125	General Noise Impact: Concerns raised that the potential significant negative impacts including environmental, socioeconomic, noise and health, public safety and security, legal and regulatory. Also raised that the noise mitigation and planting are insufficient in minimising the noise impact.	Please refer to Table 4-10 Noise and Vibration of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 324.
REP1-108	Construction Noise: Concerns raised about the construction noise impact on wildlife, nearby communities and PRow users.	Please refer to Table 4-10 Noise and Vibration of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 324.

5.10 PRINCIPLE OF DEVELOPMENT

Table 5-9 Principle of Development

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-107 REP1-113 REP1-115 REP1-123 REP1-125	Consideration of alternative design, technologies and locations: There were concerns that alternative technologies, location, size and cumulative impacts of the proposed development (i.e. rooftops panels or brownfield sites) have not been adequately considered. There is also a concern that the development could set a precedent for further solar projects on farmland. Suggestions made by the public regarding the siting of PV panels have not been adopted, and no further explanation has been provided.	Please refer to Table 4-11 Principle of Development of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 327.
REP1-136 REP1-137	Need for development: There were concerns about the purpose of the Development and the need for the development. Questions have been made regarding the trade off between net zero goals and the loss of farmland.	Please refer to Table 4-11 Principle of Development of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 329.
REP1-108 REP1-122 REP1-123 REP1-136	Scale of Development: There were concerns about the size of the Development, resulting in detrimental harm to the environment. Concerns have been raised that the scale of the development will have an impact on the character of the area for locals.	Please refer to Table 4-11 Principle of Development of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 331.

5.11 PUBLIC RIGHTS OF WAY (PROW)

Table 5-10 Public Rights of Way

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-107 REP1-137	Recreational Impact: Concerns about the loss of amenity on the PRow users such as dog walkers, bird watchers, wheelchair users equestrians and cyclists.	Please refer to Table 4-12 Public Rights of Way of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 333.
REP1-107	PRow Closure: Concerns raised about the loss of PRow, especially the loss of historic route', walking and riding routes. No consideration has been given to the impact on local mental health due to the closure of footpaths and any provision of new footpaths would require car travel to access, a poor and less sustainable substitute for what is currently available.	Please refer to Table 4-12 Public Rights of Way of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 333.

5.12 SOCIO-ECONOMICS, TOURISM AND RECREATION

Table 5-11 Socio-economics, Tourism and Recreation

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-107 REP1-113 REP1-115 REP1-125	Community Benefits: Concerns about the extent to which the local communities will benefit from the Development and the compensation for the residents.	Please refer to Table 4-13 Socio-economics of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 337.
REP1-113 REP1-125	Employment and Skills: While solar farms can create jobs during construction and operation, the overall impact on the local economy may be limited, as many jobs will be filled by external workers.	Please refer to Table 4-13 Socio-economics of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 337.
REP1-107 REP1-108 REP1-122 REP1-108	Loss of amenity / recreation resources: Concerns about the impact on the rural lifestyle that the residents enjoy, and the loss of amenity.	Please refer to Table 4-13 Socio-economics of the Responses to Relevant Representations [EN010162/APP/8.16A] , on page 337.

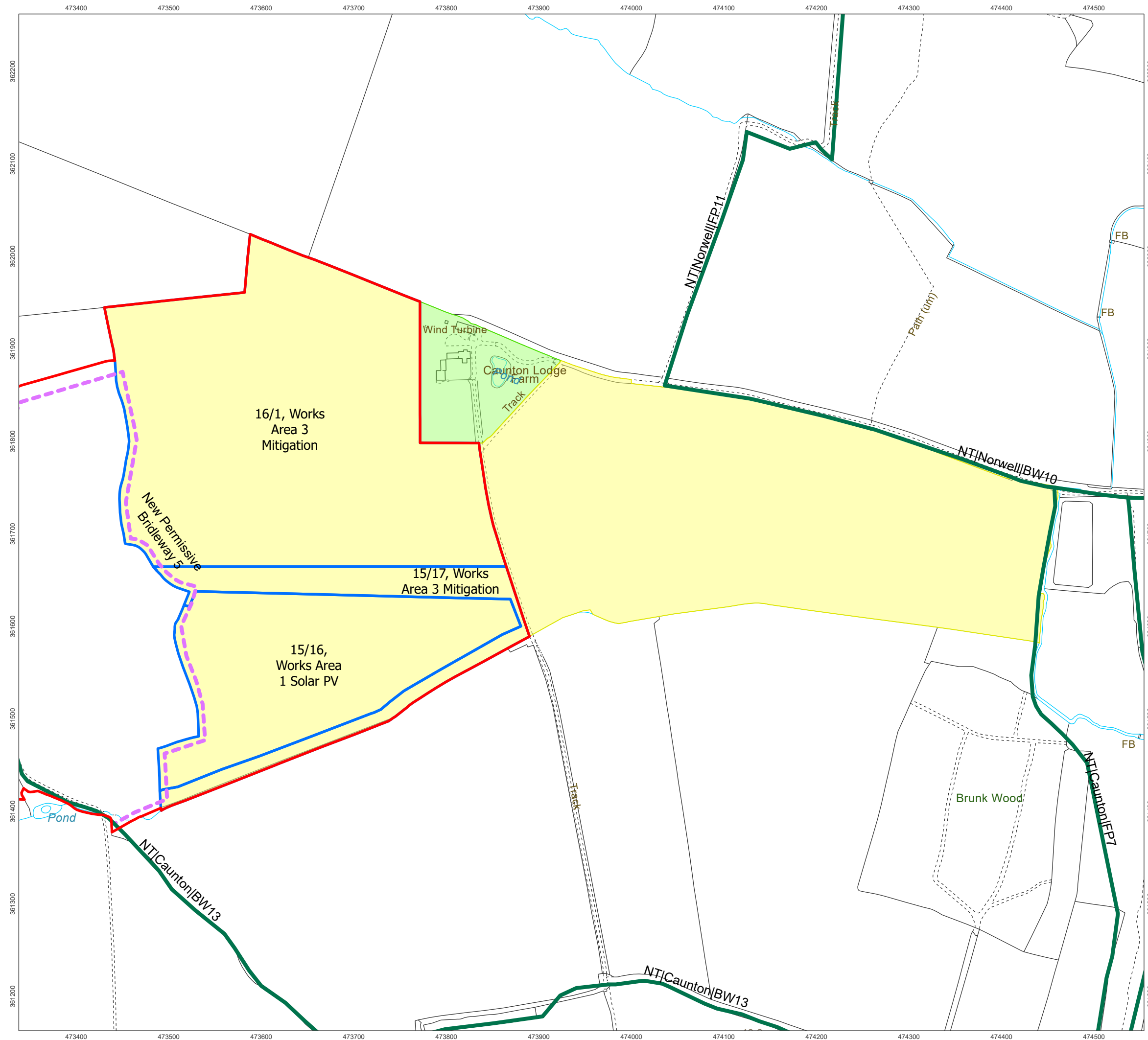
5.13 TRAFFIC AND ACCESS

Table 5-12 Traffic and Access

IP's Ref	Summary Position of Interested Party	Applicant's Responses
REP1-107 REP1-113 REP1-125	Highway Safety: Concerns about the increased traffic could disrupt access for local residents and affect the transport network across villages. There are certain roads, which are unsuitable for construction traffic, would pose a risk to users (vehicles, cyclists, equestrians, pedestrians). Concerns that the proposed panels are to be sited in small rural villages where traffic is already a problem, which will be exacerbated if this development goes ahead.	Please refer to Table 4-14 Traffic and Access of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 337.
REP1-107 REP1-126	Highway Safety during Construction: Concerns about the increased road traffic during construction would cause disruption and affect safety of local residents and the PRow users.	Please refer to Table 4-14 Traffic and Access of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 337.

APPENDIX

RESPONSE TO DRONE DEFENCE SERVICES LIMITED AND RICHARD GILL



-  Order Limits
-  DCO Plots
-  NT329682
-  NT332979
-  Public Rights of Way
-  Permissive Bridleway

1:4,000 Scale @ A3



Ref: J0080206-26-02 Date: 14/01/2026

Appendix A
Response to Drone Defence
Services Limited and Richard Gill

GREAT NORTH ROAD SOLAR AND
BIODIVERSITY PARK
This plan is being used in the
Applicant's Response to ExA's
First Written Questions