

Great North Road Solar and Biodiversity Park

Responses to Relevant Representations Report

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Contents

1	Introduction	4
1.1	Purpose of This Report	4
1.2	Approach.....	4
1.3	Structure.....	5
2	Relevant Representations – Statement of Common Ground Parties	6
2.1	Overview	6
3	Relevant Representations – Responses to Selected Individual and Technical Stakeholders	8
3.1	Overview	8
3.2	Bathley Parish Council	10
3.3	British Horse Society.....	14
3.4	Carlton on Trent Parish Council	18
3.5	Caunton Parish Council.....	32
3.6	Councillor Bert Bingham.....	35
3.7	CPRE Nottinghamshire, the countryside charity	40
3.8	Drone Defence Services Ltd	45
3.9	Eakring Parish Council.....	48
3.10	Egmanton Parish Meeting.....	55
3.11	Forestry Commission	83
3.12	Councillor Keith Myers Melton.....	93
3.13	Kirklington Parish Council	98
3.14	Kneesall, Kersall, and Ompton Parish Council.....	99
3.15	Laxton & Moorhouse Parish Council	106
3.16	Laxton and Moorhouse Solar Concerns.....	116
3.17	Lincolnshire against needless destruction.....	117
3.18	Mick George Limited	119
3.19	Matthew Arnold	122
3.20	North Muskham Parish Council.....	124
3.21	Norwell Parish Council	137
3.22	Nottinghamshire Area Ramblers	149
3.23	Norwell Solar Farm Steering Group	162
3.24	Buglife- The Invertebrate Conservation Trust	172
3.25	Ossington Residents' Group	176
3.26	Paul Mitchell and Pamela Gladwin.....	179
3.27	Richard Gill.....	214
3.28	Robert Jenrick MP	217

3.29	Rufford Parish Council	225
3.30	South Muskham & Little Carlton Parish Council.....	227
3.31	Sutton-on-Trent Parish Council	243
3.32	UK Health Security Agency	253
3.33	JPAG	254
4	Relevant Representations - Thematic Issues	270
4.1	Overview	270
4.2	Battery Energy Storage Systems (BESS)	271
4.3	Ecology and Biodiversity	276
4.4	Cultural Heritage and Archaeology	284
4.5	Flood Risks, Drainage and Water	288
4.6	General.....	293
4.7	Ground Conditions	306
4.9	Health, Safety and Security.....	308
4.10	Land Use	310
4.11	Landscape and Visual	319
4.12	Noise and Vibration	326
4.13	Principle of Development	329
4.14	Public Rights of Way	335
4.15	Socio-economics, Tourism and Recreation.....	339
4.16	Traffic and Access.....	343

Table of Contents

Table 2-1	SoCG Parties	6
Table 3-1	Responses to Bathley Parish Council.....	10
Table 3-2	Responses to British Horse Society	14
Table 3-3	Responses to Carlton on Trent Parish Council.....	18
Table 3-4	Responses to Caunton Parish Council	32
Table 3-5	Responses to Councillor Bert Bingham	35
Table 3-6	Responses to CPRE Nottinghamshire, the countryside charity.....	40
Table 3-7	Responses to Drone Defence Services Ltd	45
Table 3-8	Responses to Eakring Parish Council	48
Table 3-9	Responses to Egmanton Parish Meeting (please refer to pdf)	55
Table 3-10	Responses to Forestry Commission	83
Table 3-11	Responses to Councillor Keith Myers Melton	93
Table 3-12	Responses to Kirklington Parish Council	98
Table 3-13	Responses to Kneesall, Kersall, and Ompton Parish Council	99
Table 3-14	Responses to Laxton & Moorhouse Parish Council	106
Table 3-15	Responses to Laxton and Moorhouse Solar Concerns	116
Table 3-16	Responses to Lincolnshire against needless destruction	117
Table 3-17	Responses to Mick George Limited	119

Table 3-18 Matthew Arnold	122
Table 3-19 Responses to North Muskham Parish Council	124
Table 3-20 Responses to Norwell Parish Council.....	137
Table 3-21 Responses to Nottinghamshire Area Ramblers.....	149
Table 3-22 Responses to Norwell Solar Farm Steering Group.....	162
Table 3-23 Responses to Buglife- The Invertebrate Conservation Trust.....	172
Table 3-24 Responses to Ossington Residents' Group	176
Table 3-25 Responses to Paul Mitchell and Pamela Gladwin	179
Table 3-26 Responses to Richard Gill	214
Table 3-27 Responses to Robert Jenrick MP	217
Table 3-28 Responses to Rufford Parish Council	225
Table 3-29 Responses to South Muskham & Little Carlton Parish Council	227
Table 3-30 Responses to Sutton-on-Trent Parish Council	243
Table 3-31 Responses to UK Health Security Agency	253
Table 3-32 Responses to JPAG	254
Table 4-1 Battery Energy Storage Systems (BESS).....	271
Table 4-2 Ecology and Biodiversity.....	276
Table 4-3 Cultural Heritage and Archaeology	284
Table 4-4 Flood Risks, Drainage and Water	288
Table 4-5 General	293
Table 4-6 Ground Conditions.....	306
Table 4-7 Health, Safety and Security	308
Table 4-8 Land Use	310
Table 4-9 Landscape and Visual	319
Table 4-10 Noise and Vibration	326
Table 4-11 Principle of Development.....	329
Table 4-12 Public Rights of Way.....	335
Table 4-13 Socio-economics	339
Table 4-14 Traffic and Access	343

1 INTRODUCTION

1.1 PURPOSE OF THIS REPORT

1.1.1 This report provides the Applicant's responses to the issues raised in the Relevant Representations ('RRs') submitted to the Planning Inspectorate in respect of the Great North Road Solar and Biodiversity Park (hereafter referred to as "the Development").

1.2 APPROACH

1.2.1 A total of 247 RRs were submitted by Interested Parties ('IPs'). Of these:

- 2 were submitted by local authorities;
- 13 were submitted by parish councils;
- 8 were submitted by other statutory consultees;
- 4 was submitted by a non-statutory organisation;
- 199 were submitted by members of the public, landowners, businesses and non-statutory organisations; and
- 21 late submissions that the ExA have accepted at their discretion.

1.2.2 All of the RRs 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. In providing these responses, this report provides appropriate cross-referencing to where the issues have been addressed within the DCO Application.

1.2.3 All RRs have been triaged and 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.

- 1.2.4 The Applicant has initiated engagement via Statements of Common Ground ('SoCGs') with the Parties identified by the Examining Authority. Where those parties have submitted RRs, the matters raised within the RRs by those Parties have been responded to within the SoCG rather than duplicating the responses within this report. Section 2 sets out the Parties with which the Applicant has a SoCG, or has initiated discussions, and explains the process for updating and introducing new issues into the SoCGs in light of the RRs received.
- 1.2.5 Other Individual and Technical Stakeholders refers to defined groups that the Applicant does not intend to enter into SoCGs with but in respect of each, the nature of the issues raised in their RRs warranted a bespoke response.
- 1.2.6 All other RRs from IPs that do not fall into either of the two aforementioned categories responded to thematically within this report. Common issues raised have been grouped together according to their overarching themes. The Applicant has then provided responses to these common issues, including signposting to the relevant sections of the DCO Application documents.

1.3 STRUCTURE

- 1.3.1 This report comprises three main sections:
- Section 2: Statement of Common Ground Parties which summarises the Parties with which the Applicant has entered into SoCGs.
 - Section 3: Individual and Technical Stakeholders where the Applicant has provided bespoke responses to each of the points raised within the RRs by these Parties.
 - Section 4: Thematic Responses which summarises the issues raised in more than one RR and the Applicant's response.

2 RELEVANT REPRESENTATIONS – STATEMENT OF COMMON GROUND PARTIES

2.1 OVERVIEW

2.1.1 As set out in Section 1 of this report, RRs were submitted by IPs with whom the Applicant has produced a SoCG. Table 2-1 sets out these Parties and the corresponding RR reference number assigned by the Planning Inspectorate.

Table 2-1 SoCG Parties

SoCG Parties	PINS Reference	SoCG Reference
Nottinghamshire County Council (NCC)		8.1
Newark and Sherwood District Council (NSDC)		8.2
Environment Agency (EA)		8.3
Natural England (NE)		8.4
Historic England (HE)		8.5
National Highways (NH)		8.6
National Grid Electricity Transmission plc (NGET)		8.7
RWE Generation UK plc		8.8
Cadent Gas Ltd		8.9
Network Rail Infrastructure Ltd		8.10
Nottinghamshire Wildlife Trust		8.11
Norwell Solar Farm Steering Group		8.12

2.1.2 A number of parties where SoCGs have been requested have related to bodies who had not submitted Relevant Representations, or registered as Interested Parties. The Applicant has reached out to these bodies, but a substantive response has not yet been received. These relate to:

- Nottinghamshire Fire and Rescue;
- National Grid Electricity Distribution (East Midlands) plc;
- National Gas Transmission plc;
- Trent Valley International Drainage Board; and
- Severn Trent Water Limited

2.1.3 The Applicant will continue to engage with all SoCG parties and updates will be provided at subsequent deadlines.

- 2.1.4 The Applicant prefers to use the SoCGs as the primary means to communicate the status of issues with these Category 1 parties to avoid duplication of documentation. The SoCGs have been updated in light of the RRs to either update the existing issues or add new issues that were not previously raised by a stakeholder, alongside other engagement that has occurred.
- 2.1.5 The SoCGs and the **Statement of Commonality [EN010162/APP/8.13]** are 'living' documents and will continue to evolve and be updated to reflect the latest position at each point they are submitted as part of the Examination.

3 RELEVANT REPRESENTATIONS – RESPONSES TO SELECTED INDIVIDUAL AND TECHNICAL STAKEHOLDERS

3.1 OVERVIEW

3.1.1 This section sets out alphabetically the other IPs who have submitted RRs and the Applicant's response. This excludes those parties with whom the Applicant is seeking to enter into a SoCG.

3.1.2 The list of Individual and Technical Stakeholders for which responses have been provided by the Applicant is as follows:

- Bathley Parish Council
- British Horse Society
- Buglife- The Invertebrate Conservation Trust
- Carlton on Trent Parish Council
- Caunton Parish Council
- Councillor Bert Bingham (submitted by local authorities)
- CPRE Nottinghamshire, the countryside charity
- Drone Defence Services Ltd
- Eakring Parish Council
- Egmanton Parish Meeting on behalf of Egmanton Parish Meeting
- Forestry Commission
- Keith Myers Melton (NSDC Councillor)
- Kirklington Parish Council
- Kneesall, Kersall, and Ompton Parish Council
- Laxton & Moorhouse Parish Council
- Laxton and Moorhouse Solar Concerns
- Lincolnshire against needless destruction
- Matthew Arnold
- Mick George Limited
- North Muskham Parish Council
- Norwell Parish Council
- Nottinghamshire Area Ramblers
- Ossington Residents' Group
- Pamela Gladwin and Paul Mitchell
- Richard Gill
- Robert Jenrick
- Rufford Parish Council

- South Muskham & Little Carlton Parish Council
- Sutton-on-Trent Parish Council
- UK Health Security Agency

3.2 BATHLEY PARISH COUNCIL

Table 3-1 Responses to Bathley Parish Council

Summary Position of Interested Party	Applicant's Responses
Bathley Parish Council [RR-018]	
<i>Land Use</i>	
<p>The land in question is graded as a minimum as Grade 3a, much of it comes into 1 or 2 and the Government Guidance guidelines suggest that development should be avoided on quality land to ensure the conservation and enhancement of the natural environment.</p>	<p>Through a systematic and iterative site selection process as detailed in ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047], the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the Planning Statement [EN010162/APP/5.4A] concludes that the temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region. In consideration of the above, in accordance with national and local policy the inclusion of some BMV land within the Development is justified and the impacts on BMV land have been minimised by the nature of the Development and its design.</p> <p>ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] confirms that reasonable alternatives have been studied. The Development has been adequately considered to minimise impacts balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The Planning Statement [EN010162/APP/5.4A] then concludes that the Development complies with the policy tests for site selection and good design with the consideration of alternatives in relation to flood risk, BMV land, compulsory acquisition, and habitat sites.</p>
<i>Cultural Heritage</i>	
<p>Bathley Parish Council feels strongly that the considerations of our local Heritage</p>	<p>An assessment of the effects of the Development on above ground and below ground heritage assets, both designated and non-designated, is provided in ES Volume 2,</p>

Summary Position of Interested Party

Applicant's Responses

Bathley Parish Council [[RR-018](#)]

Assets have not been taken into account. Our surrounding villages have a wealth of history and there are many Conservation Areas in the area affected by the planning application. The outlook towards the proposed Solar Farm will have serious impacts on the Heritage Sites abounding in the area.

Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [[APP-054](#)]. This is supported **ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2A]** and **ES Volume 4, Appendix A11.1: Archaeological Desk-Based Assessment [EN010162/APP/6.4.11.1] [[APP-251](#)] [[APP-252](#)] [[APP-253](#)] [[APP-254](#)]**

The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures.

Traffic and Access

Our local roads are used by a mixture of pedestrians, cyclists, horse riders, local traffic and farm traffic, not to mention delivery drivers and utility providers. The state of the roads around Bathley is already unsatisfactory and to add to that, the amount of HGV traffic that would be needed would severely compromise other road users. The HGV's would give no space for oncoming vehicles due to their size and would cause a serious safety concern. The safety of other road users is also of paramount concern as there are no pavements along our roads. There is an increased risk of structural damage to culverts and bridges over which the access routes will pass. There is anticipated road

ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A] [[AS-046](#)] identifies the routes to be used for construction and presents that vehicles associated with the construction of solar areas will not travel through Bathley or roads within its immediate vicinity.

ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)] confirms that prior to construction works commencing, roads to be used for construction will be subject to a condition survey and any remedial measures needed to facilitate the works agreed with the local highway authority and completed. Further interim surveys and post-completion condition surveys will also be conducted and any agreed corrective measures undertaken.

Measures set out in **ES Volume 3, Figures: Chapter 14 Traffic and Access Figures [EN010162/APP/6.3.14A] [[AS-046](#)]** include the construction of passing places on narrow sections of roads to facilitate easier movement of two-way traffic and construction of new permissive paths to provide separation from vehicles by avoiding the need to walk alongside roads.

Summary Position of Interested Party

Applicant’s Responses

Bathley Parish Council [\[RR-018\]](#)

surface damage at the site access entrances which will not be repaired until construction is complete, increasing the threat to other users experiencing vehicle damage or injury.

Health and Wellbeing

The surrounding areas of our parish accommodate a wealth of walking, riding and getting out in the fresh air to enjoy the countryside possibilities. If this proposed development were to be accepted there would be a hugely detrimental effect on the countryside environment. With people working from home much more than in previous years, we feel that to preserve the Countryside in order that people can enjoy nature in its natural form is of the utmost importance to quality of life and preserving nature for coming generations. There will be a significant adverse visual amenity impact surrounding the village which will detract from the enjoyment of walking, cycling or driving around our area.

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/6.2.18A]** provides an assessment of the combined recreational amenity effects that may result from visual, noise, traffic, glint, and glare impacts. The assessment concludes that adverse effects have been identified on NT|Sutton-on-Trent|BW14 and other PRoWs intersecting the Solar PV areas. However, as these PRoWs are of local use or importance, the residual adverse effects are considered negligible and not significant in EIA terms. The majority of potential effects on PRoW and other recreation receptors were assessed as being negligible and not significant.

There are five PRoW associated with Bathley which have been assessed within **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]** all of which are were found to have negligible effects. Where they do cross the Development, this is limited to Works No. 3 Mitigation. The closest above ground infrastructure is 2 km southwest of the nearest properties in Bathley, on the southern end of Hopyard Lane. This has been updated from statutory consultation, where Works No. 1 Solar PV was within 250 m of Bathley.

The assessment also identifies beneficial effects during the operational phase on the 21 new permissive routes, which form part of the 50.6 km Circular Recreational Route. These effects were assessed as significant for only one new route due to its long-distance nature and therefore of more than local use or importance. Bathley would benefit from New

Summary Position of Interested Party

Applicant's Responses

Bathley Parish Council [[RR-018](#)]

Permissive Path 3, this route provides an alternative connection between NT|Bathley|FP7 and NT|Bathley|FP8. The route would create a 2 km circular path which would be accessible from Bathley and would avoid railway crossings. The route would add 700 m of new pathway and further contribute to the connectivity of the existing network.

Ecology and Biodiversity

The fields to be panelled are currently the habitats for protected species whose habitat will be completely lost or severely altered. The fields currently form paths for (Redacted) and other mammals such as (Redacted). If they do not have access to their traditional paths, they will take to the roads exacerbating the road traffic problems that will be caused by this development.

ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] addresses the movement of terrestrial animals and how this has been considered as part of the Development design. Overall patterns of animal movements are anticipated to be largely unchanged during the operation of the Development.

The principal ways in which the free movement of animals will be facilitated are through the fencing design, including mammal gates, which are 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]**.

Conclusion

We are not adverse to the promotion of alternative energy sources but feel that, in this case, the location is not justified. There are many areas in towns and cities where solar panels would not be noticed, such as roofs, car parks etc. This development would have a hugely detrimental effect to the surrounding area, people's livelihoods, food production and does not conform to the

The delivery of a large amount of solar generation capacity such as the Development is an essential element required for delivery of the Government's energy objectives and legally binding net zero commitments. The need for the Development has been set out in **Statement of Need [EN010162/APP/7.2] [APP-324]**.

ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] sets out the alternatives for technologies, locations and Project's layout. In terms of the selection of the location of the Proposed Development, a systematic sequential assessment was followed within Appendix C of **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**. The **Planning Statement [EN010162/APP/5.4A]** Section 6.3,

Summary Position of Interested Party	Applicant's Responses
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Bathley Parish Council [RR-018]	
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policies for solar development and given the points above, we object to the proposal.	sets out policy testing for the approach to alternative sites and site selection, concluding that the Development complies with the policy tests for good design.
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3.3 BRITISH HORSE SOCIETY

Table 3-2 Responses to British Horse Society

Summary Position of Interested Party	Applicant's Responses
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British Horse Society [RR-021]	
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Public Rights of Way

<p>The GNR Cycle Route partially follows PRow including existing Public Bridleways eg Weston BW8 from Weston southwest towards Ossington. Therefore, is all of the GNR Cycle route also inclusive of horse riders?</p>	
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<p>Some lengths annotated as 'permissive bridleway' are already county roads eg A616 at Kersall so equestrians have a right to use them. Is GNR proposing a 'behind the hedge route' to provide vulnerable road users with an alternative to using the road? That would be a welcome addition.</p>	
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<p>There appear to be some dead ends for equestrians eg Little Carlton and Cromwell</p>	
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	<p>The proposed changes to the PRow are outlined in Section 18.6.1 of ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A], with supporting information provided in ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A] and ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1] [APP-200].</p>
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	<p>A circular cycle path is not proposed in the Application. There was limited support for it in response to statutory consultation with a similar level of opposition, so the cycling use of the circular route was removed from proposals before submission. A long distance circular recreational route is proposed, which would create a 50.6 km circular route, made up of 38.1 km of existing routes, including footpaths, bridleways, Byways Open to All Traffic (BOAT) and roads, as well as an additional 12.5 km of new permissive routes. Walkers will be able to use the full extent of the long distance route, but cyclists and horse riders will be restricted to bridleways, BOATs, and public roads.</p>
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	<p>There are no proposed Permissive Bridleways which run alongside roads. There a number of Permissive Footpaths proposed, including Permissive Footpath 13 and 14 parallel to the</p>
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Summary Position of Interested Party

Applicant’s Responses

British Horse Society [[RR-021](#)]

Moor where the permissive bridleway ends on a Public Footpath or on the GNR circular walk. How will GNR ensure that routes are joined up?

Part of the proposed permissive bridleway is adjacent to the railway line at North Muskham and Carlton. How will this look on the ground in terms of distance from the line, relative height, visually? The proximity of the railway line is not a problem in itself for a permissive path, however the design will be important for safety and enjoyment for all.

A616, which would create paths off-road to improve network connectivity and overall safety for users. These routes are not immediately adjacent to the roads, but would be separated from the roads by a hedge, in all cases proposed, as is clear on the figures at the end of **ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) Appendix [EN010162/APP/6.4.5.1.1A]** , for example the proposed footpath running parallel to the A616 northwest of Kersall as shown in figure A5.1.17.

Each proposed Permissive Bridleway connects to an existing an bridleway with the exception of Permissive Bridleway 1, which was designed in consultation with local residents and connects Norwell Lane to Vicarage Lane. The route is set back by at least 20 m from the adjacent railway line throughout, and has been designed to ensure the safety of users. Existing screening is present along the railway and adjacent to the route.

- Kelham FP2 – upgrade/allow permissive access to equestrians/wheelers to join Kelham BW 3, Averham BW 1 & Upton BW 15
- Winkburn BW9 – currently dead end so make it permissive access to Eakring along the proposed PRoW diversion north adjacent to Hagley’s plantation then west along Eakring footpath 16
- Maplebeck BOAT 11 – if this is to be an access road, how will the surface, width and access be protected for PRoW users and how will users be accommodated with

Section 6.3 of the **Planning Statement [EN010162/APP/5.4A]** provides a detailed assessment of the Project against the relevant NPSs, the Project is considered to be wholly consistent with national policy, including in relation to PRoWs and amenity for local residents and visitors. The Applicant has engaged proactively with the NCC PRoW Team, landowners, local user groups and the general public to inform preparation of the PRoW strategy for the Development.

Permanent PRoW diversions have been kept to a minimum and only proposed where necessary.

New permissive routes have been proposed to increase the connectivity of the network during the operational phase, including six new permissive bridleways, creating 9.4 km of new permissive bridleway route. The permissive routes have been designed to create circular routes or provide off-road connections between existing routes where possible, but not every existing route with a dead end of road exit has been addressed. New Permissive

Summary Position of Interested Party

Applicant’s Responses

British Horse Society [[RR-021](#)]

safe access whilst construction is in progress?

- Bathley BW 12 is dead end at B6325 so a permissive route to link to off-road network as annotated south to South Muskham and east to Little Carlton is welcome.
- Caunton BW13 - partially in the development – consider a ‘behind the hedge’ link to Kersall BOAT 8 to avoid the road
- Sutton on Trent BW 18, BW17, BW14 and Ossington BW5, BW 7 partially included within site boundary and Laxton & Moorhouse FP13 could be a permissive bridleway or upgraded to extend the multi-user provision.

Kersall BOAT 8 – add permissive route to link to Kersall village

Bridleway 4 has been proposed to provide an off-road link between NT|Caunton|BW13 and NT|Kersall|BOAT8. For clarification, NT|Maplebeck|BOAT11 is not within Works No. 8 Access.

As suggested above, the Development has sought to minimise disruption to PRoW and their users, and has set out measures to manage closures, diversions, and new permissive routes.– set out within **ES Volume 4, Appendix A18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1A]**. **ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [[APP-203](#)]** has been developed to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised. **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]** confirms that the majority of potential effects on PRoW are assessed as being negligible and not significant. For some PRoW, adverse effects were assessed during construction, operation and decommissioning, but were found to be not significant in EIA terms as the affected PRoW are of local use or importance.

In consideration of the above, the layout and appearance of the site has been designed to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of the site.

Maintenance is mentioned in the documentation. Horse riders would prefer natural surfaces for the permissive bridleways where possible. Planting within the buffer zone should be done so with height and width in mind so that a useable

ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A] provides measures to manage closures, diversions, and new permissive routes. The management plan has sought to ensure continued recreational use of the PRoWs during construction, operation and decommissioning of the Development. Any new surfacing would be set out within the final RRMP, in accordance with the outline RRMP, and Requirement 18 of

Summary Position of Interested Party

Applicant's Responses

British Horse Society [[RR-021](#)]

3m width and 3.4m height is available on the permissive bridleways/shared paths. (Any changes to Public bridleways or byways must of course be authorised by the HA (Rights of Way)). How will maintenance be addressed?

Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]** would be submitted for approval to Newark and Sherwood District Council prior to implementation.

The Applicant will install the PRow diversions. The Applicant will maintain the vegetation in accordance with **ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]**. The Applicant will install and maintain the proposed permissive routes for the lifetime of the Development and the temporary PRow diversions for the lifetime of the diversion. The maintenance of the PRow network will remain the responsibility of NCC.

Traffic and Access

- How will construction traffic access the site with equestrian safety in mind? Will there be any abnormal loads ie over the usual 3.5m width of an HGV? How will PRow users be enabled to continue using the bridleways and minor roads during construction?
- Maintenance of the solar technology will require access and vehicular use. How would the operational traffic be managed to mitigate the risk to vulnerable road users including equestrians?

Non-motorised users (including equestrians) are considered in the **ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [[APP-057](#)]** and measures are identified in **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)]** in areas with an increased likelihood of interaction.

During the operational phase, it is anticipated to be around 15 vehicles per day across the whole site for maintenance purposes. These vehicles will typically be a car or LGV and use the road network in a similar manner to other road users, without specific mitigation. In areas of increased likelihood of interaction with vulnerable users, operational vehicles will take extra care. When occasional use of HGVs is required during the operational phase, they will do so with similar mitigation measures as those outlined in the **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)]**.

3.4 CARLTON ON TRENT PARISH COUNCIL

Table 3-3 Responses to Carlton on Trent Parish Council

Summary Position of Interested Party	Applicant’s Responses
Carlton on Trent Parish Council [RR-025]	
<i>Flood Risk, Drainage and Water</i>	
<p>At a meeting of the council on 3rd September 2025 councillors discussed the concerns that still exist within the parish and cannot support this development for the following reasons:</p> <p>a) Increased Flood Risk: Sutton on Trent, Carlton on Trent and many other villages in the area are rightly concerned about any development that increases the risk of local flooding. This is especially relevant at the moment as on multiple occasions in the recent past Sutton and Carlton on Trent have had significant flood events from pluvial waters originating from the surrounding catchment areas, which is where many of the proposed solar panels will be located. At consultations held by the developer they maintain that under planting the panels with grass will slow surface water runoff and thus alleviate this problem. However, this is being treated with much scepticism by locals given the fact that the soil under many of the proposed panels is</p>	<p>There is a common misconception that solar arrays create impermeable areas as the PV array are located well above the ground surface, have drip lines and substantial gaps between rows of panels and around the edges of panels.</p> <p>As outlined in ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B], there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows, however where ground beneath panels is bare there may be an increase in peak discharge. Grassland under the PV arrays will therefore act to bind the soil and slow the flow of water from the PV arrays therefore not contributing to or exacerbating existing flooding downstream of the Site.</p> <p>No formal attenuation is required for the solar panels 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 and infiltrate into the ground beneath and between each row of panels.</p> <p>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], 80 % of Work Area 1: Solar PV is on slopes of less than 6 %. Work Area 1: Solar PV is mostly shallow sloping with steeper slopes</p>

Summary Position of Interested Party

Applicant’s Responses

Carlton on Trent Parish Council [[RR-025](#)]

clay based and has poor absorption rates at the best of times. Many panels will also be located on sloping land which will accelerate the concentrated runoff from panels meaning increased and more rapid flows towards the river. This invariably results in a much higher risk of flooding especially when fluvial water levels are high which impedes surface water flow away. In both 2023 and 2024 the A1 trunk road was flooded by pluvial runoff from the surrounding fields and covering them in impermeable solar panels must surely increase the likelihood of this situation recurring. The removal of panels from sloping fields would help to alleviate this problem.

confined to the banks of drainage ditches and isolated areas, as shown in Figure A9.25 in Appendix D.

The steeper slopes in Fields 227, 234, 463, 538 and 539 upslope of Carlton on Trent are mostly earmarked for mitigation and enhancement, which includes grassland and scattered trees, which align with the EA’s “*Working with natural processes to reduce flood risk 2024*” FCERM research report.

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]**, 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.

Traffic and Access

b) Transport and Noise: Heavy Goods and other similar supporting vehicles during

ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)] confirms that prior to construction works commencing, roads to be used for construction will be subject to a condition survey and any remedial

Summary Position of Interested Party

Applicant's Responses

Carlton on Trent Parish Council [[RR-025](#)]

the construction phase of the project would adversely impact on:

- The condition of already poor road surfaces i.e. potholes
- Village traffic, particularly at times when the rail crossing is in use
- Pedestrians, dog walkers and groups plus cyclists.

Having driven the roads within and bordering the project area it is apparent the roads are totally inadequate (narrow roads with no pavements) for a significant number of HGVs to travel on, despite the provision of occasional passing areas for oncoming traffic. There is therefore a significant increase in the potential for accidents involving vehicular traffic, pedestrians/dog walkers, cyclists and horse riders

There will be an increased potential for damage to the rail crossing, the road, rails and boom section (height restriction of 5 metres).

It is anticipated that there is the potential for damage to culverts/dykes and bridges that were constructed at a time when it was not

measures needed to facilitate the works agreed with the local highway authority and completed. Further interim surveys and post-completion condition surveys will also be conducted and any agreed corrective measures undertaken.

The assessment of the effects of the Development on highway safety and disruption of access for the pedestrians, cyclists and drivers and road condition is provided in Section 14.7.1.7 Road User and Pedestrian Safety of the **ES Volume 2, Chapter 14: Traffic and Access** [[EN010162/APP/6.2.14](#)] [[APP-057](#)]. The assessment is supported by the collision review as presented within Section A14.1.4.9 of the **ES Volume 4, Appendix 14.1: Transport Statement** [[EN010162/APP/6.4.14.1A](#)] and further collision records data is provided in Appendix B of the **ES Volume 4, Appendix 14.1: Transport Statement** [[EN010162/APP/6.4.14.1A](#)]. The presentation of collision locations shown in **ES Volume 3, Figure 14.6: Personal Injury Collision Locations** [[EN010162/APP/6.3.14A](#)] [[AS-046](#)] shows that collisions in the Study Area have occurred along the A617 and A46 and to a lesser degree, the A616. A fatality was reported on Moorhouse Road.

ES Volume 4, Appendix 5.2: Outline CTMP [[EN010162/APP/6.4.5.2](#)] [[APP-203](#)] has been developed to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised. The measures set out are supported by the **ES Volume 3, Figures: Chapter 14 Traffic and Access Figures** [[EN010162/APP/6.3.14A](#)] [[AS-046](#)] and **Streets and Access Plan** [[EN010162/APP/2.8A](#)] [[AS-007](#)] [[AS-008](#)] [[AS-009](#)] [[AS-010](#)]. Key mitigation measures are summarised below:

- Installation of passing places where construction traffic routes use narrow sections of roads; and
- New permissive paths to provide separation from vehicles by avoiding the need to walk alongside roads.

Summary Position of Interested Party

Applicant's Responses

Carlton on Trent Parish Council [[RR-025](#)]

envisaged that there would be a significant increase in HGV's and their design was probably limited to farm and light goods traffic

At times of accidents/incidents on the A1 the village would have increased traffic volumes going through it bringing the obvious risks associated with this.

The measures are set out within the **Outline Travel Plan [EN010162/APP/6.4.14.2]** [[APP-284](#)], and the Detailed Travel Plan would then be secured by Requirement 14 of Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]** would be submitted for approval to Newark and Sherwood District Council. This will set out separate travel-planning measures to reduce vehicle trips to the Development.

The Applicant notes that ongoing discussions in regards to the mitigation measures have been undertaken with NCC (the Local Highway Authority) and National Highways as stated in the **Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1]** and **Statement of Common Ground with National Highways [EN010162/APP/8.6]**.

Noise and Vibration

The development will have a detrimental impact on traffic noise that is already an issue from the A1 particularly during the winter months when there is less vegetation on the trees that provides a partial natural barrier during the summer months.

The noise during the construction phase will compound the traffic noise to the extent that some sensitive receptors within the village will be affected (dwellings, Village Hall, leisure areas and church)

The results of the construction traffic noise assessment are summarised in Table 12.9 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12]** [[APP-055](#)]. Table 12.9 shows that the largest increase in road traffic noise due to construction vehicles is 2.1 dB on Caunton Road. This is a Low impact in terms of the best practice assessment criteria described in Section 12.4.4 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12]** [[APP-055](#)], and not significant in terms of the EIA regulations.

Summary Position of Interested Party

Applicant’s Responses

Carlton on Trent Parish Council [[RR-025](#)]

Land Use

c) Change of Land Use: The proposed large-scale solar development represents a shortsighted assault on our vital agricultural heritage, converting irreplaceable productive farmland into a barren expanse of panels that will irreparably diminish our capacity to feed local communities and sustain national food security. As prime arable land—nurtured over generations for crops that support families, economies, and ecosystems—is lost to this industrial footprint, we face escalating risks of supply chain vulnerabilities, higher food prices, and dependency on distant imports, exacerbating the very climate vulnerabilities the project claims to address.

ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] confirms that reasonable alternatives have been studied. The Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the **Planning Statement [EN010162/APP/5.4A]** concludes that the temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region. In consideration of the above, in accordance with national and local policy the inclusion of some BMV land within the Development is justified and the impacts on BMV land have been minimised by the nature of the Development and its design.

In addition, the Development is temporary in nature which retains the ability to reinstate arable agriculture after decommissioning Further details of the decommissioning phase works are set out in section 5.7 of **ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048]** and **ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**. The Development also facilitates a continued agricultural use through making the land available for biodiversity management grazing throughout the operational life of the Development.

Moreover, the installation process will degrade soil quality through compaction, chemical leaching from construction materials, and disruption of natural microbial life, rendering the land unsuitable for future farming even after panels are removed, while the elevated structures and

There is a common misconception that solar arrays create impermeable areas as the PV array are located well above the ground surface, have drip lines and substantial gaps between rows of panels and around the edges of panels.

As outlined in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]** surface water runoff from Work Area 1: Solar PV will be managed through RSuDS techniques such as grassland / wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario, in

Summary Position of Interested Party

Applicant’s Responses

Carlton on Trent Parish Council [[RR-025](#)]

impermeable surfaces heighten the dangers of soil erosion during heavy rains and amplify flooding in low-lying areas, potentially devastating downstream waterways and neighbouring properties. The Parish Council reject this development in favour of truly sustainable solutions that preserve farmland as the foundation of resilience. As the land ceases to be used for the many and varied types of food production, so the diverse wildlife currently experienced will change and disappear.

which high turbidity was observed in watercourses, such as Moorhouse Beck, following heavy rainfall events – see Plate 9.5 to 9.7 of **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]**.

In relation to the soil degradation matter, **ES Volume 4, Technical Appendix A17.2: Outline Soil Management Plan (SMP) [EN010162/APP/6.4.17.2] [[APP-290](#)] [[APP-291](#)] [[APP-292](#)] [[APP-293](#)]** has been developed to secure the appropriate handling soils for the construction and decommissioning works. Requirement 20 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** secures that prior to the operation of the Development a SMP for each phase must be submitted to and approved by Newark and Sherwood District Council. This must be in accordance with **ES Volume 4, Technical Appendix A17.2: Outline SMP [EN010162/APP/6.4.17.2] [[APP-290](#)] [[APP-291](#)] [[APP-292](#)] [[APP-293](#)]** and must be implemented as approved.

Ecology and Biodiversity

The proposed Substation alongside Carlton Wood would significantly impact on the wildlife there and is not acceptable.

Table 8.9 in **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [[APP-051](#)]** includes an assessment of effects on Carlton Wood Local Wildlife Site. The assessment concludes that with appropriate mitigation measures which are secured, the Development would have no significant adverse effects.

The land immediately surrounding Carlton Woods LWS will be converted from arable land to grassland and ecotone, thereby benefitting the LWS by reducing the diffuse effects of agriculture, reducing ‘edge effects’, and increasing woodland connectivity. 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/6.4.5.3A]**

Summary Position of Interested Party

Applicant's Responses

Carlton on Trent Parish Council [[RR-025](#)]

- **ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]**
- **ES Volume 4, Appendix 5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A]**
- **ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**

Landscape and Visual

d) Cumulative Visual Impact: Due to the size of the proposed solar farm the cumulative impact will be significant.

As set out at paragraph 44 of **ES Volume 4, Appendix 7.2: LVIA Methodology [EN010162/APP/6.4.7.2] [APP-209]**, cumulative impacts arise from the effects of the Proposed Development in combination with other developments, rather than from the development alone (regardless of scale). Landscape and visual effects with operational and consented development are assessed in **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** and some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are considered in Section 7.9 with no new significant effects being identified.

Elements Green have offered minimum mitigation in some areas by recommending screening by planting hedges - also recognising that this will take several years to establish.

The planting of hedgerows as mitigation for solar farms is a recommended standard (rather than minimum) approach as set out at paragraph 2.10.131 of EN-3 National Policy Statement for Renewable Energy Infrastructure. The majority of the mitigation relies on the growth of existing hedges, which would be effective more quickly than new planting – as set out at paragraph 107 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]**. Hedges along northern boundaries would also include tree planting as set out in Table 7.3 and shown on the **Landscape**

Summary Position of Interested Party

Applicant’s Responses

Carlton on Trent Parish Council [[RR-025](#)]

Masterplan [EN010162/APP/2.11] [APP-030]. This approach is not used along other boundaries in order to avoid trees shading solar arrays.

Elements Green have created some visualisations for the area of Carlton-on-Trent however concern was raised that these do not show how significant the impact would be when viewed from other frequently used locations. No mock-up visualisation gives a true representation of the visual impact, wirelines are a particularly poor way to represent and demonstrate impact. We believe all visualisations, especially those of Carlton-on-Trent, should be repeated as photomontages. Furthermore, it is noted that the use of wireline is not an accurate way to represent and demonstrate impact. We ask that visualisations are extended to include the following to inform and alleviate concerns the Parish Council wish these to be included:

(For ease of identification, we have used the What3Words (W3W///) to identify the point from which the visualisations should be taken and where possible which direction.)

The additional locations requested are the same as those requested by Carlton-on-Trent PC comments regarding the Preliminary Environmental Information Report (PEIR). Viewpoints 54 and 55 were added and viewpoint 18 was moved in response to that request as set out in Table 7.1 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** and in more detail in on page 7 in **ES Volume 4, Appendix 7.1: Consultation [EN010162/APP/6.4.712] [APP-208]**. Wirelines are the primary technical visualisations which inform the assessment and are widely used by assessors in the field for many forms of development. Photomontages are provided as additional illustration rather than to “*demonstrate*” the effects. The assessment covers all visual receptors in the study area, including the receptors represented by the additional viewpoints requested, and effects on those receptors are described at sections 7.7.10.7 and 7.7.10.8 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** and paragraph 49 of **ES Volume 4, Appendix 7.5: Non-Significant Effects [EN010162/APP/6.4.7.2] [APP-212]** , and as shown on **ES Volume 3, Figure 7.6: Visual Receptors Before Mitigation [EN010162/APP/6.3.7A] [AS-035]** and **ES Volume 3, Figure 7.7: Visual Receptors After Mitigation [EN010162/APP/6.3.7A] [AS-035]**.

Summary Position of Interested Party

Applicant's Responses

Carlton on Trent Parish Council [[RR-025](#)]

View from FP looking towards C-o-T (179oS
– 270oW) W3W///village.crashing.hack

Gateway near Common Farm looking
towards C-o-T (145oSE)
W3W///animal.steer.ruling

FP near The Grange looking towards C-o-T
(97oE) W3W///banter.lifters.cubic

View from gateway looking east to C-o-T
across the fields (30oNE)
W3W///thundered.triathlon.incursion

Full view of locality (A full 360o view)
W3W///dictation.blending.slider

Popular place to stop due to historical asset
(173oS – 255oW)
W3W///underline.revolts.sending

Full view required (A full 360 view)
W3W///propelled.debit.lend

Full view required (A full 360 view)
W3W///gossiping.nappy.jetted

Looking from Besthorpe Nature Reserve (2
views in a Westerly direction)
W3W///Singing.heat.utter

Summary Position of Interested Party

Applicant’s Responses

Carlton on Trent Parish Council [[RR-025](#)]

Two views looking 275oW looking over the gates towards C-o-T
 W3W///clean.sheets.different

e) Visual Impact Amenity: The significant visual and adverse impact of turning 7000 acres of what is currently farmland into an industrial landscape, the size of a large town, containing regimentally aligned solar panels should not be underestimated. The impact to all who wander out from the boundaries of the village, whether that be to walk their dogs, enjoy a countryside stroll, exercise, improve their mental health and wellbeing or even take a relaxing drive, will have their experience radically impeded. More so, residents that currently have a direct and picturesque view of the countryside, specifically MOST residents of Carlton on Trent whose properties reside on the western side of the main road through the village, will have their beautiful view of the rural landscape significantly and adversely impaired.

f) Visual Impact on Heritage Assets and Recreation: Visitors to our region are drawn by the varied selection of historical assets ranging in size and demonstrating the effect

The landscape and visual impacts are assessed in **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]**, including on landscape character and visual effects on road users and rights of way. Residents of Carlton on Trent on the west side of the main road into the village are outside of the 250m RVAA study area with the closest solar area being over 500m to the west. This suggests that the Development is unlikely to change the visual amenity of those properties in Carlton-on-Trent to such an extent that it becomes a matter of Residential Amenity.

It is noted that the Interested Party raised concerns that the change in landscape from the Development would impact recreational amenity. However, there is no substantive evidence based on environmental assessment to suggest that the change in landscape / visual amenity from the Development would change visitor behaviour or would adversely affect resources, assets or facilities with tourist draw.

ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13] [APP-056] suggests that the PRow User surveys do not identify walking/hiking as one of the main tourism draws for the District, and as such it is unlikely that accommodation providers rely on this form of recreational tourism for consistent business. This suggests that changes on landscape would be unlikely to alter visitor behaviour and affect the accommodation businesses.

The Development incorporates embedded design to ensure continued recreational use of public rights of way. The **ES Volume 4, Appendix A18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1A]** also provides a number of upgrades to the PRow in and around the site of the Development.

Summary Position of Interested Party

Applicant's Responses

Carlton on Trent Parish Council [[RR-025](#)]

of different historical eras on our community. The large swathes of solar arrays which any visitor will have to drive through to enjoy these assets will significantly detract from any pleasurable excursion. Elements Green propose information boards around the solar park; these are an unnecessary blight on the countryside.

In consideration of existing tourism patterns and the PRow measures, any effects on visitor behaviour in the form of a loss of recreational amenity are assessed as localised and temporary. A similar conclusion was reached by the Planning Inspectorate¹ and agreed by the Secretary of State² in similar circumstances (and in-line with the NPS EN-1 policy test) regarding Cleve Hill Solar Park.

The information boards are provided as part of the enhancement measures, which is secured via **ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1A]**. The details of a recreational routes management plan would be subject to agreement with NSDC. This is secured through and Requirement 18 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**

Principle of Development

g) Size: The development is far too large. The removal of panels on sloping fields as mentioned in (a) above will also help to reduce the size of the development and also the visual impact.

A reduction to the scale of the Development is not considered to be a reasonable alternative, in order to maximise the energy generation potential of the Development in line with the Applicant's grid connection offer. In addition, the size and location of the Development have been carefully considered within **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]**, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts.

¹ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010085-001920-EN010085%20CHSP%20Report.pdf>

² <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010085-001956-200528%20EN010085%20CHSP%20Secretary%20of%20State's%20Decision%20Letter.pdf>

Summary Position of Interested Party

Applicant's Responses

Carlton on Trent Parish Council [[RR-025](#)]

Public Rights of Way

h) Recreation: The village of Carlton on Trent is bounded to the east by the river Trent and has no specific recreational facilities provided for local inhabitants and children. Recreational activities are based on access to the land around the village and the open countryside, public rights of way and bridleways this affords. In particular, the land to the west of the village and to the west of the A1 comprises the majority of this access. This is the area proposed for the solar panels. The proposals require that existing footpaths be re-routed in large part and be screened from the solar farm facilities by fences, hedges and tree plantings. There is concern that the open views enjoyed by walkers, cyclists and horse riders will be lost for a very long period of time.

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/6.2.18A]** 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]** [[APP-020](#)] and **ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1]** [[APP-200](#)].

Two routes associated with Carlton on Trent have been diverted, NT|Carlton-On-Trent|FP6 and NT|Carlton-On-Trent|FP10, the effects of which have been assessed as minor, non-significant adverse effects. The two routes currently form a cross across field 180. The routes would be replaced by 530 m of footpath which would follow the edge of the solar PV area. The route would be more direct and continue to provide a connection between the unnamed road to the east, Ossington Road and the wider PRow network. New Permissive Footpath 5 has been proposed to create a 2 km circular route in combination with the diverted routes and NT|Carlton-on-Trent|FP11. The route would add 760 m of new pathway and further contribute to the connectivity of the existing network.

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/6.4.5.1A]**.

Summary Position of Interested Party

Applicant's Responses

Carlton on Trent Parish Council [[RR-025](#)]

Ecology and Biodiversity

i) Protected Species: The land within Carlton-on-Trent parish is home to owls, bats and badgers; their habitats will be significantly disrupted during the construction phase making it unlikely they will return. The identified biodiversity areas are already existing so not a means of increasing biodiversity or providing alternative habitats for displaced species. The map of breeding birds does not match what has been observed locally, with tawny owls, sparrow hawks and kestrels seen and heard frequently in the parish in increasing numbers. The council would like to see further surveys undertaken.

A range of baseline studies has been undertaken to establish the status and distribution habitats and notable and protected species in the area around Carlton-on-Trent 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 are assessed in **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]**. The assessment concludes that with appropriate mitigation measures which are secured, the Development would have no significant adverse effects.

Biodiversity benefits will be provided by retaining and enhancing some habitats and creating others. Additional biodiversity benefits are embedded in the Development, such as reducing the amounts of pesticides and fertilisers into the environment.

The survey methods in **ES Volume 4, Appendix 8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4] [APP-217]** follow good practice and are a standardised and repeatable method 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, although the reported increases is encouraging. Additional pre-commencement and pre-construction surveys will be undertaken to help inform mitigation during the construction phase and these are secured in **ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**.

The Applicant also notes that the approach to biodiversity and wildlife mitigation 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]**

Summary Position of Interested Party

Applicant’s Responses

Carlton on Trent Parish Council [[RR-025](#)]

- **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]**

Socio-economics, Tourism and Recreation

j) Jobs: A number of residents within the parish work on the land and are set to lose hours and/or employment.

The Applicant has outlined the employment effects during construction and operation within section 13.8.1 of the **ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13]** [[APP-056](#)]. It concludes that during the construction phase there will be 120 local net direct construction FTE jobs and 60 local net direct manufacturing FTE jobs. Furthermore, during operation phase there will be 20 net direct local FTE jobs. This includes jobs lost due to Agricultural employment uses of the land, which are the only employment uses expected to temporarily cease.

Community

Conclusion

Carlton-on-Trent Parish Council have attended several of the public consultation events to obtain as much information as possible in the limited time available. [We do not believe that applications of this magnitude were envisaged when the

The **Consultation Report [EN010162/APP/5.1]** [[APP-296](#)] describes how the Applicant undertook a six-week statutory Phase Two Consultation (in addition to an introductory round of non-statutory consultation) – both exceeding the 28 days minimum required under the Planning Act 2008. The pre-application consultation process that the Applicant held complied with its commitments as consulted on for the draft SoCC and set out in the final published SoCC captured in **Statement of Community Consultation Materials [EN010162/APP/5.1.5]** [[APP-307](#)].

Summary Position of Interested Party	Applicant's Responses
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Carlton on Trent Parish Council [[RR-025](#)]

guidance for NSIP projects was created; this needs to be addressed at the highest level in order for everyone, including the developer, to ensure the best outcome.]

Carlton-on-Trent Parish Council highlighted the concerns above during the consultation phases in order for the applicant to address these points and to alleviate predicted issues/problems but see very little evidence of this in the present application. Under the circumstances the Parish Council has no choice but to object to the proposal.

During these rounds of consultation, the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Development in a Preliminary Environmental Impact Report (PEIR). A non-technical summary (NTS) was published to accompany the PEIR, and the Applicant held public information events and hosted free-to-use communications channels to help aid accessibility and understanding of the Development. As Table 6.2 of the Consultation Report highlights, the Applicant carried out significant engagement with parish authorities, including, Carlton on Trent Parish Council, presenting early design changes and flood alleviation measures. Feedback received from Carlton-on-Trent Parish Council was considered by the Applicant and responded to in the **Section 42 Applicant Response Table [EN010162/APP/5.1.11] [APP-314]**. A second submission from Carlton-on-Trent Parish Council was also considered; this submission formed part of the appendices to Newark and Sherwood District Council's feedback.

3.5 CAUNTON PARISH COUNCIL

Table 3-4 Responses to Caunton Parish Council

Summary Position of Interested Party	Applicant's Responses
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Caunton Parish Council [[RR-027](#)]

Flood Risk, Drainage and Water

Flood alleviation is a major concern for Caunton, the Parish wants hydrological reassurance that they will not receive an

There is a common misconception that solar arrays create impermeable areas as the PV array are located well above the ground surface, have drip lines and substantial gaps between rows of panels and around the edges of panels.

Summary Position of Interested Party

Applicant's Responses

Caunton Parish Council [[RR-027](#)]

increase in water flow during extreme weather events and request that modelling is done around Caunton.

As outlined in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**, there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows, however where ground beneath panels is bare there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water from the PV arrays therefore not contributing to or exacerbating existing flooding downstream of the Site.

No formal attenuation is required for the solar panels 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 and infiltrate into the ground beneath and between each row of panel.

Models of the existing pluvial flow pathways around the catchment of Caunton 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.

General – Cumulative Impact

We urge that consideration be given to the 'cumulative impact' from other proposed Solar sites at Muskham Wood and Foxholes concerning not only water flow but traffic from construction and the longevity of noise and other disruption.

Muskham Wood Solar Park (ID14) and Foxholes Solar Farm (ID17) have been identified as sites to be considered in the long list of cumulative developments, presented in **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]**. The developments are then taken forward to Stages 3 and 4 (assessment). They have been assessed under the environmental topics of water, noise, and transport.

Section 9.8 of **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]** [[APP-052](#)], Section 12.8 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12]** [[APP-055](#)] and Section 14.10 of **ES Volume 2, Chapter 14:**

Summary Position of Interested Party

Applicant's Responses

Caunton Parish Council [[RR-027](#)]

Traffic and Transport [EN010162/APP/6.2.14] [[APP-057](#)] confirm that the identified developments do not conflict and do not give rise to cumulative effects.

Traffic and Access

The route through Caunton includes narrow roads with no pavements, the roads are regularly used by dog walkers, horse riders, cyclists and walkers and there are concerns that there will be an increased risk of accident or injury with heavy construction traffic using these narrow roads. There is an increased risk of structural damage to culverts and bridges over which the access routes will pass, anticipated road surface damage to the site access entrances which will not be repaired until construction is complete increasing the threat to other users experiencing vehicle damage or injury.

ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A] [[AS-046](#)] identifies the routes to be used for construction and presents that vehicles will not travel through Caunton. Traffic will however use the A616 to the south of Caunton.

ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)] confirms that prior to construction works commencing, roads to be used for construction will be subject to a condition survey and any remedial measures needed to facilitate the works agreed with the local highway authority and completed. Further interim surveys and post-completion condition surveys will also be conducted and any agreed corrective measures undertaken.

3.6 COUNCILLOR BERT BINGHAM

Table 3-5 Responses to Councillor Bert Bingham

Summary Position of Interested Party	Applicant's Responses
Councillor Bert Bingham [RR-037]	
<i>Ground Conditions</i>	
<p>That this development is considered temporary is a matter of contention. Sterilisation of essential minerals should be a consideration.</p>	<p>Consideration and assessment of the effects of the Development on potential mineral resources is provided in ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10] [APP-053] with supporting information provided in ES Volume 4, Appendix A10.9: Mineral Resource Assessment [EN010162/APP/6.4.10.9] [APP-238].</p> <p>The Mineral Resource Assessment has been undertaken in accordance with the requirements of strategic policy SP7 (Minerals Safeguarding, Consultation Areas and Associated Minerals Infrastructure) of the Nottinghamshire County Council Minerals Local Plan adopted in 2021. The assessment undertaken has concluded that the Development will not result in the permanent sterilisation of mineral resources, where present, and the Development would not pose a constraint to future extraction of mineral resources following decommissioning.</p> <p>The Applicant notes that Nottinghamshire County Council agree with the conclusions of the assessment undertaken and does not have any outstanding concerns relating to minerals.</p>
<i>General</i>	
<p>Local concentration and cumulative impact should be considered for such a giant scheme. The development footprint and low energy efficiency of solar farms results in excessive environmental impact per unit of</p>	<p>The Applicant has adopted a staged approach to the identification of cumulative developments, which is consistent with PINS guidance. ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A] provides a full list of cumulative developments considered in that process, which then identifies a shortlist of</p>

Summary Position of Interested Party

Applicant's Responses

Councillor Bert Bingham [[RR-037](#)]

energy produced. The end of life of solar farms can be linked to end of subsidies, imposing great risk on such developments for investors and implying a high risk for final restoration commitments and public liability.

developments to be considered as part of the Stage 3 and 4 cumulative effects assessment.

An assessment of cumulative effects of the Development with other shortlisted developments is presented on a topic-by-topic basis in the technical chapters of the Environmental Statement, Chapters 7 to 18. All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "*When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.*" These effects will be secured by implementation of the Development as described, together with the control measures as set out.

The Development would have a 40 year operational life and Requirement 19 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** secures that the Development must cease generating electricity on a commercial basis no later than the 40th anniversary of the date on which electricity is first exported from the Project to the national grid commercially.

The Applicant would be responsible for decommissioning the Development as described in Section A5.6.2 of **ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**. This is secured through Requirement 19 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** which provides that prior to commencement of any decommissioning works for any part of the Development, a decommissioning and restoration plan must be submitted to Newark and Sherwood District Council for its approval, in consultation with Nottinghamshire County Council.

Summary Position of Interested Party

Applicant's Responses

Councillor Bert Bingham [[RR-037](#)]

Land Use

National food security must be a major consideration in such developments on prime farmland.

As set out in Section 6.8 of the **Planning Statement [EN010162/APP/5.4A]**, the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Newark and Sherwood District has a higher concentration of BMV land than the national average and any other site selection would be likely to result in similar, or greater, impacts.

The temporary use of BMV land during the Development lifetime relates to Work Areas 1, 4, 5 and 8, which totals 745.6ha³. This amount of BMV represents 0.4% of the total BMV land in Nottinghamshire, or 0.13% of the total BMV in Newark and Sherwood District. The permanent loss of BMV land represents 0.008% of the total BMV land in Newark and Sherwood District. 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.

Ecology and Biodiversity

Nottinghamshire County Council's shortly to be adopted Local Nature Recovery Strategy and related policies have been ignored. Given the effective sterilisation of vast tracts of land how do the principles of NCC's biodiversity net gain aspirations of 20% (double those required by Statute) apply?

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/6.4.8.13] [APP-226]**. 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.

³ Totals taken from Table 17.8 of **ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060]** for WAs 1, 4, 5, and 8 for Grade 2 and Sub Grade 3A. WAs 6 and 7 have been excluded as they are either non-agricultural land or relate to the consented Staythorpe scheme.

Summary Position of Interested Party

Applicant's Responses

Councillor Bert Bingham [[RR-037](#)]

Section A5.1.3.2 in **ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]** explains how the final LNRS will be considered in the final designs.

Flood Risks, Drainage and Water

Aspects of flood risk as well as pollution whether to air, land or water warrant much closer analysis.

An assessment of flood risk is provided in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**.

The potential for pollution of the water environment is assessed in **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052]** which concludes the Development would have no significant effects on water resources throughout the construction, operation and decommissioning stages, through implementation of good practice measures outlined in the **ES Volume 4, Appendix A5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A]**, **ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]** and **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**.

Battery Energy Storage System

Associated battery farms and the fire and environmental risks they pose need to be considered.

The BESS has been carefully sited away from residential properties. The nearest receptors to the BESS unit are located at Flash Farm and Kelham, approximately 550 metres and 750 metres away, respectively. The site selection process is detailed in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]**.

The BESS layout has been designed to mitigate fire risk and prevent firewater contamination, as outlined in **Concept Design Parameters and Principles [EN010162/APP/7.14A]**.

Summary Position of Interested Party

Applicant's Responses

Councillor Bert Bingham [[RR-037](#)]

ES Volume 4, Appendix A5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] provides proactive measures aiming to deter the spread of fire should it occur on-site. Measures include fire safety arrangement, monitoring, emergency response plan and maintenance schedule. On this basis. **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059]** concludes that the risk associated with a potential fire in a battery unit is not a significant effect.

Requirement 7 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** secures that prior to the commencement of Work No.5A a FSMP must be submitted to and approved by Newark and Sherwood Council in consultation with Nottinghamshire Fire and Rescue Service and the Environment Agency. This must be in accordance with the **ES Volume 4, Appendix A5.4: Outline FSMP[EN010162/APP/6.4.5.4A]** and must be implemented as approved.

General - Waste

End-of-life waste disposal of toxic materials is of high importance as is compliance with NCC's Waste Local Plan. Key issues where Nottinghamshire County Council can demonstrate particular expertise are significant considerations in the Relevant Representation and Inspection.

Outline Site Waste Management Plans (SWMPs) have been provided to secure waste management controls for the construction, operation and decommissioning phases of the Development. Each of these will be secured via a DCO Requirement. They are contained within:

- **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**
- **ES Volume 4, Appendix A5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A]**
- **ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**

During construction, excavated soil would be either stored for re-use as described in the **ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2]**

Summary Position of Interested Party	Applicant's Responses
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Councillor Bert Bingham [RR-037]	
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	<p>[APP-290] [APP-291] [APP-292] [APP-293] or re-used within the Order Limits as part of the landscaping described in ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]. The worst-case estimates of the construction waste are set out in Table 16.8 of the ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059].</p>
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	<p>During the decommissioning phase, it is expected that the metals comprising the cabling, solar PV mounting pole structures, inverters/transformers and fencing as well as other components, including inert waste, will be recycled. An estimate of the principal waste arisings from the complete removal of components at decommissioning (excluding de minimis) is set out in Table 16.10 the ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059].</p>
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3.7 CPRE NOTTINGHAMSHIRE, THE COUNTRYSIDE CHARITY

Table 3-6 Responses to CPRE Nottinghamshire, the countryside charity

Summary Position of Interested Party	Applicant's Responses
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CPRE Nottinghamshire, the countryside charity [RR-038]	
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Landscape and Visual

Landscape character impact - the extreme industrialisation of massive swathes of open countryside, out of scale and context with the rural area.	
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	<p>Effects on landscape character are assessed in section 7.7.9 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050] and section A7.5.2 of ES Volume 4, Appendix 7.5: Non-Significant Effects [EN010162/APP/6.4.7.2] [APP-212].</p>
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Summary Position of Interested Party

Applicant's Responses

CPRE Nottinghamshire, the countryside charity [\[RR-038\]](#)

Cumulative impact - Sprawling nature of the proposed installation would surround some rural settlements and overwhelm others.

As set out at paragraph 44 of **ES Volume 4, Appendix 7.2: LVIA Methodology [EN010162/APP/6.4.7.2] [APP-209]**, cumulative impacts arise from the effects of the Proposed Development in combination with other developments, rather than from the development alone (regardless of scale).

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 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]**.

Land Use

Impact on food security which remains as important as fuel security. Over 60% of our best farmland nationally is already at risk of flooding. There is no need for industrial-scale solar on productive farmland. Impact on the lives and livelihoods of farmers and landowners, potentially now subject to compulsory purchase powers.

Please refer to the Land Use response above, on Page 37.

Details of the need for the Development are provided in the **Statement of Need [EN010162/APP/7.2] [APP-324]**.

Public Rights of Way

Amenity impact on rights of way users - there is no comparison between

Effects relating to amenity and health of PRow users have been assessed throughout relevant chapters of the ES. **ES Volume 2, Chapter 18: Recreation**

Summary Position of Interested Party

Applicant's Responses

CPRE Nottinghamshire, the countryside charity [\[RR-038\]](#)

walking/riding through open countryside and walking through inescapable corridors formed by industrial scale solar infrastructure

[EN010162/APP/6.2.18A] provides an assessment of the combined recreational amenity effects that may result from visual, noise, traffic, glint, and glare impacts. The assessment concludes that adverse effects have been identified on NT|Sutton-on-Trent|BW14 and other PRoWs intersecting the Solar PV areas. However, as these PRoWs are of local use or importance, the residual adverse effects are considered negligible and not significant in EIA terms. The majority of potential effects on PRoW and other recreation receptors were assessed as being negligible and not significant.

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 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]**.

The assessment also identifies beneficial effects during the operational phase on the 27 new permissive routes, which form part of the 50.6 km Circular Recreational Route. These effects were assessed as significant for only one new route due to its long-distance nature and therefore of more than local use or importance.

Health, Safety and Security

Health and well-being impact, including but not exclusively inverter noise impacting the tranquility of the countryside and the risk of thermal runaway of battery energy storage systems resulting in toxic fumes and contaminated run-off.

A Human Health Impact Assessment (HHIA) has been undertaken to consider key determinants to protect human health and it is provided in Section 16.4 of the **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059]**. The assessment has considered the interrelationships of impacts informed by other chapters in the ES on residents and subsequent effects on health and wellbeing.

Summary Position of Interested Party

Applicant's Responses

CPRE Nottinghamshire, the countryside charity [\[RR-038\]](#)

The outcome of the HHIA concludes that the Development is unlikely to negatively affect people's health and wellbeing in its widest sense. There are no effects that:

- Cause potentially severe or irreversible negative effects;
- Affect a large number of people; or
- Specifically, may affect people who already suffer poor health or are socially excluded.

Potential beneficial effects on health include effects the Development will have through employment and the creation of more recreational routes.

The Applicant has also provided an adequate consultation and has maintained an open discussion with the public throughout the design process, aiming to reduce uncertainty for local people as far as possible and to prevent any physical or psychological impact from an early stage of the Development.

The BESS has been carefully sited away from residential properties. The nearest receptors to the BESS unit are located at Flash Farm and Kelham, approximately 550 metres and 750 metres away, respectively. The site selection process is detailed in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4]** [\[APP-047\]](#).

The BESS layout has been designed to mitigate fire risk and prevent firewater contamination, as outlined in **Concept Design Parameters and Principles [EN010162/APP/7.14A]**.

ES Volume 4, Appendix A5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] provides proactive measures aiming to deter the spread of fire should it occur on-site. Measures include fire safety arrangement, monitoring, emergency response plan and maintenance schedule. On this basis. **ES Volume 2, Chapter 16:**

Summary Position of Interested Party

Applicant's Responses

CPRE Nottinghamshire, the countryside charity [\[RR-038\]](#)

Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] concludes that the risk associated with a potential fire in a battery unit is not a significant effect.

Requirement 7 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** secures that prior to the commencement of Work No.5A a FSMP must be submitted to and approved by Newark and Sherwood Council in consultation with Nottinghamshire Fire and Rescue Service and the Environment Agency. This must be in accordance with the **ES Volume 4, Appendix A5.4: Outline FSMP [EN010162/APP/6.4.5.4A]** and must be implemented as approved.

General - Decommissioning

This vast installation is not temporary by any reasonable measure. 40 years is a remainder-of-lifetime impact for many current residents or two generations of younger families. In addition, the restoration of the site to its current condition would add many years to the length of any consent granted.

CPRE supports the de-carbonisation of energy production and this can be achieved in a better way by maximising the harvesting of solar energy from roofs and other artificial surfaces. Research carried out by the UCL Energy Institute for CPRE has demonstrated that by 2050: 'there is potential for up to 117GW of low carbon electricity to be generated from roofs and

The Development would operate for 40 years and the Applicant has secured the decommissioning in Requirement 19 of Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]**.

The decommissioning programme is detailed in Section A5.6.2 of **ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**. This involves the removal of infrastructure built as part of the Development in Work Area 1 (Solar PV) and Work Area 5a (BESS). Other infrastructure that may be removed or retained is set out in Section A5.6.2.1 of the DRP.

Requirement 19 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** 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. As such, the Development is temporary.

Summary Position of Interested Party	Applicant's Responses
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CPRE Nottinghamshire, the countryside charity [RR-038]	
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<p>other developed spaces'. The government is failing to exploit opportunities for solar energy from these sources, despite these having widespread public support (REDACTED)</p>	
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<p>We acknowledge the government's plan connect a Land Use Framework with strategic spatial energy plans and a more robust grid network. However, none of that strategic work is ready yet and will mostly target the period after 2030 (REDACTED)</p>	
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	<p>The delivery of a large amount of solar generation capacity such as the Development is an essential element required for delivery of the Government's energy objectives and legally binding net zero commitments. The need for the Development has been set out in Statement of Need [EN010162/APP/7.2] [APP-324].</p>
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	<p>ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] sets out the alternatives for technologies, locations and Project's layout. There is no policy requirement to consider alternatives such as roof-mounted solar and other artificial surfaces. Section 6.3 of the Planning Statement [EN010162/APP/5.4A] sets out policy testing for the approach to alternative sites and site selection, concluding that the Development complies with the policy tests for good design.</p>
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3.8 DRONE DEFENCE SERVICES LTD

Table 3-7 Responses to Drone Defence Services Ltd

Summary Position of Interested Party	Applicant's Responses
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Drone Defence Services Ltd [RR-045]	
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Properties – Impact on Landowners

<p>Drone Defence Services Ltd ("Drone Defence") is a lawful occupier of [REDACTED] Norwell Woodhouse, Nottinghamshire, under a Licence to Occupy granted in 2023. Since then, we</p>	
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	<p>The Applicant has not been provided with a copy of the Licence to Occupy dated 2023 and is unable to comment upon whether the Interested Party is a lawful occupier of the Property, nor whether the use of the property for the stated purposes, and which are alleged to be affected by the Development, is a lawful planning use.</p>
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Summary Position of Interested Party

Applicant's Responses

Drone Defence Services Ltd [[RR-045](#)]

have continuously operated the site as a research and development hub for defence and security technologies, focusing on unmanned aerial systems (UAS) and airspace monitoring platforms. Our operations comply with the Civil Aviation Authority's (CAA) Open Category A3, which facilitates iterative prototype development without requiring pre-approved aircraft specifications, leveraging the site's low-risk rural setting. We are 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. This aligns with our broader programme supporting national security interests.

In addition to occupation rights, Drone Defence benefits from easements under a 1998 Deed of Grant (Title NT332979), applicable to both owners and occupiers, permitting the installation and operation of service infrastructure. These easements enable the deployment of ground-based Detect and Avoid (DAA) sensors, essential for developing safe BVLOS systems. The

The Applicant understands that the land said to be occupied by the Interested Party is outside of the Order Limits and is owned by another interested party [RR-181] which has the benefit of a Category 2 land interest over Plots 15/16, 15/17, 16/1 in respect of easement rights reserved over that land contained in a Transfer dated 30 September 1998.

Those parcels are proposed to subject to full compulsory acquisition powers and can be seen coloured pink on sheets 15 and 16 of the **Land Plans EN010162/APP/2.2AB** Plot 15/16 is required for the purposes of Work no 1 (Solar PV) and Plots 15/17 and 16/1 are required for Work no. 3 (Mitigation).

As noted in the **Land Rights and Negotiations Tracker [EN010162/APP/4.4A]** [[APP-016](#)] row 23 the Applicant has concluded an Option for Lease with the freehold owner of the land the subject of the easement rights so as to facilitate the Development.

The 1998 Deed of Grant referred to by the Interested Party grants rights to the owners and occupiers for the time being of the relevant land 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 (referred to in the deed as 'Service Installations').

It is unclear whether the ground based infrastructure referred to by the Interested Party has already been installed, and/or whether it falls within the scope of the rights for such Service Installations pursuant to the Deed, or, if they do, whether these rights will be affected by the Development.

The Applicant has sought to clarify these matters with the Interested Party and will update the Examining Authority in due course.

The Interested Party's claim for compensation has not been substantiated and in any event does not reflect the basis upon which a claim for compensation pursuant to section 10 of

Summary Position of Interested Party

Applicant's Responses

Drone Defence Services Ltd [[RR-045](#)]

proposed solar infrastructure, specifically panel blocks W18.1 and W18.3, alongside a new public right of way (PRoW), will fundamentally disrupt this environment. Currently, [REDACTED] 170-acre viable area supports A3 testing, with a principal flight volume of approximately 100 acres. Geospatial analysis indicates that the placement of solar panels would then, due to CAA regulations, require a 150m separation buffer, and the PRoW, introducing a 50m human presence buffer, will reduce this flight volume by 72 acres (72% of the principal area). This, combined with an elevated Ground Risk Class (GRC) from low-value farmland to high-value infrastructure with regular personnel, renders the site non-viable for A3 or BVLOS development. Drone Defence will continue operations until the site's usability is extinguished by the development, at which point we will seek statutory compensation. Drone Defence takes no position on the wider scheme's merits. However, if the developer proceeds with W18.1, W18.3, and the PRoW as proposed, extinguishing our established use, we will pursue compensation as a Category 2 or 3 rights

the Compulsory Purchase Act 1965 would be assessed, namely diminution in value of the relevant land interest.

Summary Position of Interested Party	Applicant's Responses
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Drone Defence Services Ltd [\[RR-045\]](#)

holder under the Planning Act 2008 (s.152) and Compulsory Purchase Act 1965 (s.10). A preliminary valuation, pending CAA AAE accreditation progress, estimates this claim at £3–7 million, reflecting lost operational capacity and disturbance costs.

3.9 EAKRING PARISH COUNCIL

Table 3-8 Responses to Eakring Parish Council

Summary Position of Interested Party	Applicant's Responses
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Eakring Parish Council [\[RR-046\]](#)

Traffic and Access

As a parish council we object to the solar farm in the Parish of Eakring. This is due to the scale and impact of the plans on the environs of our village and surrounding area.

Traffic- The minor road from Caunton to Eakring is narrow and unsuitable for the number of large vehicle movements proposed during construction and subsequent management of the site. The

ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A] [\[AS-046\]](#) identifies the routes to be used for construction. The road between Caunton and Eakring is considered suitable for accommodating construction traffic; the road has centre line markings that indicate that it is at least 5.5 metres. Passing places are proposed along this route to ease the occasion when two HGVs might pass.

Pedestrian use along the road between Caunton and Eakring is expected to be low due to no footways and fast moving traffic.

The embedded mitigation measures to be implemented during the construction phase of the Development will be secured through **ES Volume 4, Appendix A14.2: Outline Travel**

Summary Position of Interested Party

Applicant's Responses

Eakring Parish Council [[RR-046](#)]

road is a quiet rural route used by cyclists, horse riders and joggers including children travelling to the local primary school at Kneesall. The number of extra passing places proposed along the Caunton - Eakring road is an indication of how unsuitable the road is for extra traffic.

Plan [EN010162/APP/6.4.14.2] [APP-284]. This provides a framework for the management of construction vehicle movements to and from the Development to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised.

Requirement 14 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1A] [AS-012]** requires that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC.

Public Rights of Way

Deletion of part of a PROW which is an historic route is unacceptable.

The proposed changes to the PROWs are outlined in Section 18.6.1 of **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**, with supporting information provided in the **Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4] [APP-020]** and **ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1] [APP-200]**. Out of the 117 identified PROWs, eight will be fully or partially closed, with diversions in place to maintain the continuity of connection to the wider PROW network. Seven of these, that currently pass through Work no. 1 Solar PV area, will be diverted during all phases. One route (NT|Sutton on Trent|BW14) will be diverted only during the construction and decommissioning phase. No path would be closed without an alternative or replacement being opened first.

Proposals for closures and re-routing have been avoided where practicable. As set out on **Environmental Statement Volume 3, Chapter 18 Recreation Figures [EN010162/APP/3.18A] [AS-048]** diversions of PROWs 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. PROWs that follow tracks and hedgerows have been retained in

Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [RR-046]	
	their current positions, with the exception of NT Sutton on Trent BW14 which requires temporary diversion only during the construction and decommissioning phases.
<i>Landscape and Visual</i>	
The landscape around Eakring is rural, open and undulating.	The area around Eakring forms part of the Village Farmlands with Ancient Woodlands LCT which is described at section 7.7.9.3 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050].
<i>Cultural Heritage</i>	
The field pattern can be traced back to the 10th Century. The proposed solar farm will negatively impact the landscape plus historic features together with the Conservation status of our village.	An assessment of the effects of the Development on both above ground and below ground heritage assets is provided in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054]. The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures.
<i>Biodiversity</i>	
Wildlife associated with arable farming systems will be negatively impacted.	<p>ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] includes an assessment of the potential impacts on wildlife, including a wide range of species associated with arable farming. Table 8.12 summarises the likely effects on important ecological features during the construction, operation and decommissioning phases. The assessment concludes that with appropriate mitigation, the Development would not result in significant adverse effects on wildlife.</p> <p>Measures to avoid or reduce the risk of adverse environmental effects during construction, operation and decommissioning are secured in the following management plans:</p>

Summary Position of Interested Party

Applicant’s Responses

Eakring Parish Council [[RR-046](#)]

- **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**
- **ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]**
- **ES Volume 4, Appendix A5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A]**
- **ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**

Land Use

The soil of the fields in the proposed panelled area are classified Grade 2, very high quality and is a limited valuable asset to the Nation.

.ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [[APP-060](#)] includes an assessment of the Development’s potential effects to soil quality and the availability of BMV land.

Disturbance of soils and land quality in the areas in which the construction compounds are erected is temporary in nature. Only limited areas of land would continue to be affected for the operation of the Development, namely the agricultural land required for construction of the base areas for fixed equipment (such as substations), the internal access tracks and the BESS compound. This would result in a temporary disturbance of 19.4 ha of BMV land during operation of the Development.

Development in Work no. 4 (Intermediate substations), Work no. 5b (400 kV compound) and Work no. 7 (Consented Staythorpe BESS and Connection) may remain following the decommissioning phase which would, at worst case, result in the permanent loss of 4.5 ha of BMV.

Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [RR-046]	
	<p>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 of the area.</p>
<p><i>General – Cumulative Impact</i></p>	
<p>The village already hosts a solar farm plus another a short distance away, together with 5 wind turbines in Eakring and Bilsthorpe Parishes - all visible from the village. Eakring is also home to the National Grid Training Centre with its associated structures.</p> <p>As a Parish Council we have been supportive of change within the village supporting new building and residents plans. However the scale of the solar farm creates an industrial landscape that is incompatible with our village.</p>	<p>The Applicant has adopted a staged approach to the identification of cumulative developments, which follows PINS guidance. ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A] provides a full list of cumulative developments considered in that process, which then identifies a list of developments to be considered as part of the Stage 3 and 4 cumulative effects assessment. The following non-exhaustive list of solar farms has been identified for further consideration at Stages 3 and 4 of the cumulative assessment. These solar projects have subsequently been assessed within the relevant chapters of the Environmental Statement.</p> <ul style="list-style-type: none"> • ID4 – One Earth Solar Farm • ID5 - Fosse Green Energy Limited – Solar • ID11 - Winkburn Solar Farm • ID14 - Muskham Wood Solar Park • ID15 - Knapthorpe Solar Park • ID16 - Kelham Solar Farm • ID17 - Foxholes Solar Farm • ID18 - Tuxford Solar Farm • ID305 - Ridge Clean Energy Limited 250 MW solar farm

Summary Position of Interested Party

Applicant's Responses

Eakring Parish Council [[RR-046](#)]

- ID306 - West Burton Solar Project Limited >50MW solar farm
- ID307 - Gate Burton Energy Park Ltd 500 MW solar farm
- ID 309 - Cottam Solar Project Limited >50MW solar farm
- ID310 - Tillbridge Solar Limited >50MW solar farm
- ID311 - Springwell Energy Farm Limited >50MW solar farm
- ID312 - Ecotricity (Heck Fen Solar) Limited >50MW solar farm
- ID 314 - Beacon Fen Energy Park Limited >50MW solar farm

All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "*When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.*" These effects will be secured by implementation of the Development as described, together with the control measures as set out.

As set out at paragraph 44 of **ES Volume 4, Appendix 7.2: LVIA Methodology [EN010162/APP/6.4.7.2] [APP-209]**, cumulative impacts arise from the effects of the Proposed Development in combination with other developments, rather than from the development alone (regardless of scale). Landscape and visual effects with operational and consented development are assessed in **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** and some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are considered in Section 7.9 with no new significant effects being identified.

Summary Position of Interested Party

Applicant's Responses

Eakring Parish Council [[RR-046](#)]

Health and Wellbeing

The well-being of our residents and community will be negatively impacted due to the closeness of the farm and the likelihood of glint and glare. Also the fencing and associated infrastructure.

A Human Health Impact Assessment (HHIA) has been undertaken to consider key determinants to protect human health and it is provided in Section 16.4 of the **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16]** [[APP-059](#)]. The outcome of the HHIA concludes that the Development is unlikely to negatively affect people's health and wellbeing in its widest sense.

The impacts associated with Glint & Glare have been assessed in **ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1]** [[APP-286](#)], the findings of which have been considered in the respective ES Chapters as necessary. The assessment applied a robust approach, assuming all areas with the potential to accommodate solar panels will be fully utilised. Effects were found to be comfortably below the assessment criteria derived from best practice UK and international guidance, and therefore acceptable at all residential dwellings.

Glint & Glare associated with the design to be ultimately constructed is dependent upon many factors, including the final PV array layouts, the precise height, orientation, type and tilt of the panels; it is therefore not practicable to fully assess every possible combination of parameters within the design envelope. It is therefore a standard approach to assess a layout based on the largest potential array area, with typical parameters for tilt, orientation etc, and discuss potential mitigation options for that design. In order to ensure that any mitigation properly responds to the actual design to be constructed, a detailed mitigation scheme will be designed to match the final PV array design in consultation with relevant stakeholders, which will be secured by an appropriate DCO Requirement.

3.10 EGMANTON PARISH MEETING

Table 3-9 Responses to Egmonton Parish Meeting (please refer to pdf)

Summary Position of Interested Party	Applicant's Responses
Egmonton Parish Meeting [RR-047]	
<i>Traffic and Access</i>	
<p>We have decided to focus our report on the Traffic and Access Requirements. For the following reason: An unacceptable increase in construction traffic which will principally affect the residents of Partridge Farm, Hagg Lane residents and on a wider scope, the Village of Egmonton. Traffic and access are now our largest concern, given that the northern portion of the development has been changed to detrimentally affect the residents of the parish on Hagg Lane and Moorhouse Road, as well as providing an increase in traffic congestion generally, into the centre of the village from the inclusion of Weston Road and Moorhouse Road into the scheme.</p> <p>Throughout all phases of consultation, we have sought to understand the plans put forwards by the developer for traffic and access, and were disappointed that the developer has changed the plans to negatively impact our community at the final stage of the developer's consultation</p>	<p>ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A] [AS-046] identifies the routes to be used for construction and confirms that the village of Egmonton is not included to form part of the construction routes.</p> <p>The access strategy for the northern part of the Proposed Development was amended in response to constraints identified on other routes. The proposed access strategy now maximises the opportunity to use internal routing, thereby limiting the environmental impact of construction vehicles passing through Ossington and Moorhouse.</p>

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

process. Throughout all of the development from its inception, the developer had insisted that traffic for the northern quadrant would be via the B1164 Great North Road or southwards through Moorhouse and Ossington and that no traffic would pass our dwellings. This was the case at in person events, which informed discussions and personal submissions by several residents, through Stage 1 (Non-Statutory Consultation), Stage 2 (Statutory Consultation) until the Targeted Consultation was unexpectedly delivered.

Traffic and Access History

In order to understand our concerns, it is necessary for the planning inspectorate to understand the philosophy put forward by the developer at each of the stages, so we have listed the history to date: Proposal Made Public with limited documentation available October 2023 The proposal was first made public to the majority of the residents when a post card was received and the first maps were issued by the developer. Initially, it was hard to understand the impact from the limited maps and details that were available from

For a project of this scale and complexity, the design and solutions for its delivery are constantly reviewed and amended in response to conflicting issues that arise. As investigations progressed for the original access strategy, viability issues arose. It is considered that the construction routes shown in **ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A] [AS-046]** maximises the opportunity to use internal routing, thereby limiting the environmental impact of construction vehicles passing through Ossington and Moorhouse.

New passing places are proposed along Moorhouse Road to ease traffic movement and these are shown in **ES Volume 3, Figure 14.5: Passing Place Locations [EN010162/APP/6.3.14A] [AS-046]**.

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

the developer, which simply did not contain enough information to understand the scope and reach of this massive project.

Stage 1 (Non-Statutory) Consultation – 16th January 2024 – 27th February 2024

Phase 1 was not officially responded to by Egmanton Parish Meeting. All representation was on an individual basis. More in-depth Documentation was made available by the developer, including the Masterplan drawings, of which a snippet of our affected area is shown in Figure 3.1 – Section of developers “Preliminary Masterplan (Dated 16/01/2024)”.

At this stage, residents had been making individual responses, verbally with the developers at in person events, through parish meetings with the developer present, and finally by written representation through email or other means. From the outset for the development, individually we were told that traffic would not pass by our outlying parish properties as per the developers Stage 1 Masterplan map and that all traffic for this quadrant would be via the main access road off the great North Road. Overall, the individuals received responses

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

to their consultation which was reasonably well received. And we were hopeful that the developer was addressing our concerns effectively.

Stage 2 (Statutory) Consultation 9th January – 20th February 2025

For Stage 2 consultation, the developer introduced an additional access route off the B1164 Great North Road at Ladywood Lane. Although the developer's narrative regarding the use of this lane was lacking in any specific detail, we accepted that this would further negate the use of Moorhouse Road as a source for construction traffic, as shown in Figure 3.2 – Section of developers "PEIR Stage Masterplan (Dated 06/12/2024)". This was further informed by additional detail within the PEIR which showed all traffic flow to the site access from south to north on Moorhouse road, which would not pass our properties. The Parish responded to Phase 2 with the main focus of the parish response during the statutory consultation as follows:

- Mitigation of visual amenity
- Redirection of public rights of way
- To understand the developers traffic plans
- To make

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

corrections to errors within the provided documentation. Broadly, the parish response built upon the concerns that had been addressed by the individual responses of phase one, adding a more rugged review of the PEIR documentation, in particularly attempting to understand the developer's philosophy relating to transport and access strategy. We found the documentation relating to this topic to be incomplete and with a number of contradictory maps and narrative. No technical response was received from the developer to this round of consultation. During this phase outside of our consultation submission, we also requested a copy of the Construction Traffic Summary applicable for our village from the developer, as we had received information from other villages that these had been submitted by the developer. The additional documentation provided concise detail which was not available within the PEIR documentation. Our request for the summary document was not completed for our submission.

3 Targeted Consultation 8th May 2025 – 6th June 2025 Shortly after the submission of Stage 2's consultation and receiving no

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

response from the previous consultation, and no prior warning or offers for additional parish discussion from the developer beforehand, we were presented with the Targeted stage which removed all prior access from the B1164 Great North Road accesses in favour of the site access from Moorhouse Road as shown from the developers map Figure 3.3 – Section of developers “Targeted Consultation-Figure 1 Order Limit Additions (28/04/25)”. This period of consultation, having evolved over a year and seven months from the projects public inception was overturned and re-imagined in the final three months. The parish responded as follows: • The Parish objected to the planned changes. • The parish noted that Gypsy Lodge (Now Renamed Partridge Farm) would be severely affected by traffic, being within approximately 2m of the single track Moorhouse Road. • The parish noted that traffic into the village would be severely affected from the east. • The parish made several suggestions (outlined in later sections) regarding alternative access. No technical response was received from the developer to this round of consultation.

Summary Position of Interested Party

Applicant’s Responses

Egmanton Parish Meeting [[RR-047](#)]

Following interventions by our county councillor, that Parishes (in general) were disappointed not to have received any feedback from our consultations, Egmanton Parish subsequently received a response that the developer was still open to discussion. However, the overarching feeling was that the consultation would have to continue as part of the DCO process with the planning inspectorate.

4 PINS Submission – This Phase The developer has officially changed the order constraints to include Weston and Moorhouse Roads. Omitting the access roads or Wadnal Lane and Ladywood Lane.
 5 Egmanton Parish Meeting Great North Road Solar Development Initial Response to the Planning Inspectorate

Highway safety during construction

Egmanton Parish disagrees with the proposal to utilise the new Moorhouse Road / Weston Road link for the following reasons:

An unacceptable increase in construction traffic which will principally affect the

Whilst it is acknowledged that the properties of Partridge Farm and Hagg Lane will see an increase in traffic, it is considered that the routing strategy shown in **ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A]** [[AS-046](#)] provides the most effective access strategy and least environmental impact overall.

Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)] provides a framework for the management of

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

residents of Partridge Farm (formerly Gypsy Lodge), Hagg Lane residents and on a wider scope, the Village of Egmanton.

We see very little mitigation offered by the developer to reduce the impact on this home; in fact, the responses we have received from the developer appear to be very dismissive of our concerns as non-issues.

construction vehicle movements to and from the Development, and secures measures to reduce vehicle trips to the Development. Mitigation measures include:

- measures to control timings of construction vehicle movements in avoiding peak hour travel to mitigate potential capacity constraints.
- construction of passing places on narrow sections of roads to facilitate easier movement of two-way traffic as informed by the swept path analysis;
- Section A5.2.4.1 of the management plan secures the **ES Volume 4, Appendix 14.2: Outline Travel Plan [EN010162/APP/6.4.14.2] [APP-284]** which includes measures for the provision of shuttle buses to transport construction workers to and from the Order. A detailed version of the Outline Travel Plan, is to be finalised at detailed design stage.

Requirement 14 in Schedule 2 of the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC. This must be in accordance with the **ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [APP-203]** and must be implemented as approved.

Within our original phase two consultation response, we placed much emphasis on the importance of the quantity, location and construction of any passing points, especially in relation to placement around Partridge farm as any structures inevitably lead to backing up of the dykes. Past history shows any pipework or obstructions placed within these dykes require constant

ES Volume 3, Figure 14.5: Passing Place Locations [EN010162/APP/6.3.14A] [AS-046] shows the location of passing places on Moorhouse Road. **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [APP-203]** shows that Moorhouse Road has relatively low traffic volumes and whilst the occasion of vehicles passing along this section in opposing directions along this section of road will infrequent, passing places are proposed to ease these two-way movements.

When considering the routing of construction traffic, numerous conflicting environmental impact are considered, before the solution with the least impact pursued. The strategy presented is considered to offer the least environmental impact. Whilst Moorhouse Road is

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

maintenance to ensure they are kept clear from debris and in good working order. We feel we have not received sufficient understanding or acceptance from the developer on how critical the placement of these passing points will be. Our suggestion, given the capital expenditure that will be made available on this project is that it should not be unfeasible for access to be made into array N1/N2 from the alternate entrances of Ossington Lane (PA13) over a temporary structure bridging the Beck. Therefore, reducing the need for any heavy traffic utilising site access PA 12. Whilst this may not remove all of the traffic passing by our residences, we feel that a suitable redirection of most of this traffic, particularly HGVs would reduce the impact to a tolerable level. We feel that the developer has not undertaken a suitable review of our suggestions, and has instead used the simplest solution. Egmanton Parish Meeting continues to have no opposition to entry into array N1/N2 via site access PA12 within the operational phase with the expectations of low attendance, given our experience of maintenance regime of Egmanton Solar Farm.

classified as being of high sensitivity, the section of road impacted by construction traffic is approximately 1km and has low baseline traffic volumes. The introduction of passing places and other the measures in the CTMP are aimed at easing the impact in this area.

Summary Position of Interested Party

Applicant’s Responses

Egmanton Parish Meeting [[RR-047](#)]

Traffic noise

Feedback on the Traffic and Transport document

Having reviewed the several of the documents and figures pertaining to traffic and access strategies, it is disappointing that the developer has chosen to alter much of the naming convention of the sites components from the conventions that have been understood all the way through the process so far. We have reviewed document “6.2.14 Environmental Statement Volume 2 – Chapter 14 Traffic and Transport - Rev 1” which appears to be the document that references the majority of our concerns, with the following comments: Construction Noise Egmanton parish has made several comments relating to the proximity of the Partridge Farm to Moorhouse Road in regards to NOISE and vibration. However, the responses from the developer only seem to have addressed vibration in each case. The stated responses suggest that because the house has no concrete footing that vibration will not pose a problem to the structure.

The methodology for the assessment of construction traffic noise is presented in Section 12.4.4 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055]**. The standard assessment methodology specifically prohibits its use for roads with AAWT flows of less than 1000. For such roads, the widely accepted approach for such road is to utilise the ‘haul road’ method, also described in Section 12.4.4.

A 4 m setback distance is the standard distance from the roadside specified in the Calculation of Road traffic Noise, described in Section 12.3.13 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055]**. It is important to note that the assessment of road traffic noise relates to external noise levels, and as such, the distance of any specific building façade to the roadside is not relevant to the assessment. Based upon the anticipated construction traffic flows, an external worst-case construction traffic noise level of 60 dB(A) was calculated, which as shown in Table 12.5 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055]**, is a Low impact by a substantial margin of 5 dB, and not significant in terms of the EIA Regulations.

Regarding traffic vibration, Section A5.2.7.11 of **ES Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [APP-203]** states that a pre commencement condition survey of the routes to each site access will be undertaken to identify any defects in the road surface (i.e. potholes). Remedial measures (i.e. repair to potholes) will be undertaken, with a particular focus on those located close to residential properties, to ensure access roads are free from irregularities and minimise traffic vibration.

With regard to the final comment, it is important to note that the above relates solely to the assessment of construction traffic on public roads; the assessment of noise from on-site construction works (which includes on-site HGV traffic) is described in Section 12.4.3 of **ES**

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

However, other than a stated comment by the developer, there is no actual technical reference, source or justification to substantiate this claim. Our limited understanding (as laymen) and the limited availability of publicly available documentation on this issue means we cannot accept that this will not pose a greater concern than we are led to believe. In terms of road noise, document "12.4.4 Construction Traffic Noise Assessment Methodology" suggests that it is impossible to determine the BNL due to the methodology not being suitable on roads with an AAWT below 1000, of which Moorhouse Road appears to be categorised. Moorhouse Road therefore seems to be lumped into the category of an "internal haul road" with the HGV noise assumed to be a worst-case figure of 4m from any property, which clearly doesn't fit the application of partridge Farm which sits within approximately 2m of the carriageway. The road noise is then lumped into the general operation noise calculation for the construction tasks. The report states: "(6) The overall noise levels for each activity have been calculated by combining the

Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [[APP-055](#)]. Road traffic noise is not 'lumped in' to the on-site construction noise assessment as suggested and the two matters are dealt with individually, applying the appropriate methodologies and assessment criteria in each case.

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

noise from the construction equipment and HGV movements within the construction area itself". While we understand and accept that the construction noise (Piling, compacting, excavation etc) will take place some 400m from receptor H2 (Hagg road residents, nearest Partridge Farm) resulting in a negligible outcome from construction, utilising the same distances for presenting road traffic noise for traffic physically passing a property within 2m, producing 85dB (as per statement in paragraph 10 of the same document) would seem to be a doubtful proposition.

Assessment Methodology

14.4.3 Sensitive receptors

Identifies Moorhouse and Ossington, which should now have now been reduced (in terms of traffic noise) as sensitive receptors under the new scheme. This section now fails to consider the additional burden placed upon The Hagg Lane and Partridge Farm residents that will now absorb the full weight of traffic in the development of the array shown as N1/N2.

Table 14.12 of **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [[APP-057](#)] acknowledges the character of this road and notes the presence of residential properties and accordingly classifies the link as having a High sensitivity rating for assessment.

Summary Position of Interested Party

Applicant's Responses

Egmonton Parish Meeting [[RR-047](#)]

14.5.2 Walking

We note that all the baselines for walking involve village areas on well-established routes, especially references to B1164, which is principally the most enhanced of all the roads, including a generous width, an established footpath most of which separates traffic from pedestrians through a curbed surface and a large proportion of this link road has recently been resurfaced and includes fresh line markings. Indeed, we feel that each of the study areas provided vastly exceeds the status of the recently added Weston and Moorhouse roads (Links 15 and 14) and do not pose a representative enough narrative of the roads at the bottom of the scale within the development. We feel that overall, mitigation for walkers is lacking throughout the document.

Section 14.5.7.12 and Section 14.5.7.13 of **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [[APP-057](#)] acknowledges that Moorhouse Road and Weston Road has no streetlighting or pedestrian facilities. As a result, Table 14.12 classifies these links as having a High and Medium sensitivity rating respectively, which is followed through into the assessment.

The assessment of the effects of the Development on highway safety and disruption of access for the pedestrians, cyclists and drivers is provided in Section 14.7.1.7 Road User and Pedestrian Safety of the **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [[APP-057](#)].

14.5.3 Cycling

Moorhouse Road and Weston Road have in the past been used for the Tour of England route and are often used by a variety of local clubs as they are quiet for road bike users. Mountain bike users also utilise the rights of way off Hagg Lane

Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)] provides a framework for the management of construction vehicle movements to and from the Development, and secures measures to reduce vehicle trips to the Development.

Requirement 14 in Schedule 2 of the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC. This must

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

(NT|Egmanton|BW5) onto Moorhouse Road, as well as the various unclassified farm tracks that intersect both roads. In 2024 a cyclist was killed in a road traffic accident on Ossington road, South of Moorhouse, this road is a continuation of Moorhouse road and approximately 1 mile from Hagg Lane. It contains many of the same features of poor width, blind bends, high hedges and no separation for non-motorised users (NMU). We feel that overall, mitigation for cyclists is lacking throughout the document.

be in accordance with the **ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2]** [[APP-203](#)] and must be implemented as approved. It is expected that any scheduled events, such as the Tour of England, will need to be duly considered.

14.5.4 Horse Riding

Horse riding on Moorhouse and Weston roads are a daily occurrence, Hagg Lane is a bridleway (NT|Egmanton|BW5) which intersects both roads to form a triangular route is commonly used by equestrians from Egmanton and Moorhouse. Indeed section 14.5.4 (102) does indeed state that looking at the facilities for equestrians in isolation does understate the use of these roads, to which we agree. We feel that overall, mitigation for equestrians is lacking throughout the document.

Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)] provides a framework for the management of construction vehicle movements to and from the Development, and secures measures to reduce vehicle trips to the Development. In areas of increased likelihood of interaction with non-motorised users, including equestrians, site-specific measures will be introduced, such as reduced vehicle speeds.

Requirement 14 in Schedule 2 of the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC. This must be in accordance with the **ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2]** [[APP-203](#)] and must be implemented as approved.

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

Sensitivity Rating 14.5.10 (In reference to the table 14.12 shown below) Although we agree that the sensitivity classification of Moorhouse Road should rate as high, we note that perhaps one of the houses closest to the traffic within the whole scheme, partridge Farm has not been noted as fronting the road within approximately 2m. Whereas the property noted on Weston Road which is significantly withdrawn from the road surface has been mentioned. We feel that Partridge Farm has been poorly represented within this description. Similarly, the only access onto Hagg Lane as a registered bridleway and access to private residences has also been missed from the narrative. We note reference to Egmanton Solar farm; however, we do not understand the purpose of mentioning this site as Justification, as it is extremely uncommon for any traffic to access this site. It would seem to bear no relevance to the narrative of the justification. Please refer to the extract of Table 14.12: Link Sensitivity Rating in the Representation's submission.

Whilst it is acknowledged that Partridge Farm is not specifically referenced in the text, its location is acknowledged and contributed to the justification for Moorhouse Road being classified as being of High sensitivity, along with Hagg Lane and its associated purpose. Table 14.12 of **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [[APP-057](#)]** shows the classification as having a High sensitivity rating, which is followed through into the assessment.

14.6.1 Access Routes Hierarchy

For a project of this scale and complexity, the design and solutions for its delivery are constantly reviewed and amended in response to conflicting issues that arise. As

Summary Position of Interested Party

Applicant's Responses

Egmonton Parish Meeting [[RR-047](#)]

This section lays out a reasonable hierarchy for using the largest and most appropriate roads first; Trunk Roads, A Roads, B Roads, Other roads. Unfortunately, it appears that the developer has fallen back to using the easiest roads first. The design consideration using local access tracks directly off the B1164 seemed to us, to meet the requirements of the good practice defined by the developer, utilising access directly off one of the largest roads of the scheme to access the northern quadrant of the development. Over the subsequent stages it seemed as though the developer was maximising the strategy by adding further trackways until the targeted consultation, where all of the previous work was abandoned. We still feel that mitigation can be achieved by utilising the alternative PA13 entrance to the northern quadrant and that internally routing down the proposed internal haul roads will still achieve the developer's goal of utilising a site compound for the array adjacent to Moorhouse Road opposite Hagg Lane, utilising a temporary structure to bridge Moorhouse Beck.

investigations progressed for the original access strategy, viability issues arose. It is considered that the construction routes shown in **ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A]** [[AS-046](#)] offer the least environmental impact.

New passing places are proposed along Moorhouse Road to ease traffic movement and these are shown in **ES Volume 3, Figure 14.5: Passing Place Locations [EN010162/APP/6.3.14A]** [[AS-046](#)]

When considering the routing of construction traffic, numerous conflicting environmental impact are considered, before the solution with the least impact pursued. The strategy presented is considered to offer the least environmental impact.

Summary Position of Interested Party

Applicant's Responses

Egmonton Parish Meeting [[RR-047](#)]

14.6.2 Site Access Arrangements

Site Access PA12 is 150m south of Hagg Lane and will be utilised to construct array N1/N We understand that the access along Moorhouse Road will only be utilised to service this compound as the developer has proposed these changes in order to restrict vehicular access through Moorhouse village further south. Similarly, we understand that array N1/N2 will not be connected to the arrays to the south of it due to the intersection of Moorhouse Beck. We have suggested to the developer that access into this array could be accommodated by a temporary structure to utilise the proposed internal haulage road structure that facilitate the construction of the closest arrays to the south. We note that paragraph 152 seems to specify that site access locations have been "sought to be on minor roads". This statement would seem to be add odds with the developers own reasoning within the access routes hierarchy. If you are going to use minor roads for access, then inevitably more minor roads will be utilised in the scheme.

When considering the routing of construction traffic, numerous conflicting environmental impact are considered, before the solution with the least impact pursued. The strategy presented is considered to offer the least environmental impact. Numerous other environmental constraints would be presented along an internal track, including ecology areas and watercourses.

It is considered that the construction routes shown in **ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A] [[AS-046](#)]** offer the least environmental impact.

The access route hierarchy does seek to avoid minor roads until the last section as it nears a site access. Site access locations on major roads are avoided unless necessary, due to the higher volume of traffic and greater vehicle speeds conflicting with the turning movements of construction traffic.

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

14.6.3 Passing Places

We understand that there will be eight passing places. Four of which will be on Weston Road and four on Moorhouse Road. We now also understand that there will be a lowered traffic speed limit of 30 miles per hour and that each passing place will incorporate a traffic signal zone. This would seem to be excessive and although we understand that the developer has sought to lower the speed limit and incorporate passing points, we did not expect that additional traffic signals would be also included as well as per diagram "ENO10162-APP-2.13 Traffic regulation Measures Plan". We understood that the passing points would be sufficiently wide enough to permit the crossing of all vehicles. It would seem excessive to also include several sections of independent traffic lights which will only add to the dwell time of the traffic on the route. With the developer stating a construction vehicle every two minutes, the added traffic lights would seem to add to the congestion, and further increase the journey time from the intersection of B1164 to Hagg lane, from

The sections of road for traffic signals identified on **Traffic Regulation Measures Plan [EN010162/APP/2.13]** [[APP-032](#)] are intended only to be used the construction of the passing places, to provide sufficient space for workers. Following the completion of the passing places, the traffic signals would be removed and traffic operate under free-flow conditions.

Summary Position of Interested Party	Applicant's Responses
Egmanton Parish Meeting [RR-047]	
approximately two minutes to upwards of ten to fifteen minutes based at waiting times at each set of signals. This would seem excessive for a distance of one mile	
<p>14.6.4 Construction Phase Trip Calculation</p> <p>It is quite possible that we have missed it, however at this stage, it seems impossible to properly understand the programme that has been provided and how it fits the traffic requirement of our area of the scheme. There doesn't seem to be a reference of which areas fit into which phases. Although it's clear to see that there are differences between the various phases which suggests that the programme is not simply generic. A clear plan showing which areas fit into which phases should be provided by the developer. From the table, we can only assume that the disruption to Weston Road and Moorhouse road will be in the order of twelve months</p>	<p>Section 5.5.1 of ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048] notes that '<i>The construction is likely to be undertaken in at least five phases' and that it is 'likely that the main elements of construction activity (i.e., excluding enabling works/site clearance, re-instatement and landscaping) would be underway on a maximum of half the proposed solar area at any one time. In practice it is likely to be much less than this, but the above has been used for assessment purposes as a worst-case'</i>.</p> <p>Paragraph 98 then notes the '<i>worst-case estimate of the construction programme, with the minimum anticipated phasing, as used for assessment in the EIA, is provided in Table 5.11. It should be noted that, although Table 5.11 shows 5 phases, the separation between phases is spatial but not necessarily temporal, with phases 1 and 3 being concurrent and 2, 4 and 5 being concurrent. This is equivalent, therefore, to two temporal phases with two or three construction teams operating concurrently.</i></p> <p>This assumption is then set out within the Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [APP-203], which secures a detailed CTMP for each phase of the development. This is secured by Require 14 of the Draft DCO [EN010162/APP/3.1B]</p> <p>Details of the phasing of the Authorised Development are then secured by Requirement 3 of Schedule 2 of the Draft DCO [EN010162/APP/3.1B]</p>
14.6.5 Embedded Mitigation	<p>ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [APP-203] has been developed to ensure that the construction phase can be undertaken in a safe and efficient</p>

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

There doesn't seem to be any mitigation for the effects of construction traffic meeting walkers, cyclists or equestrians in this section which is very troubling. The Outline travel plan which is quoted within the section does not provide any clarity on this concern. Paragraph 169 details the use of internal haul roads - we agree with this philosophy and suggest that the internal haulage routes within the arrays to the east of Moorhouse be extended to include the northernmost N1/N2 array, opposite Hagg Lane.

manner and includes measures such as reduced vehicles speeds and banksmen where conflict with non-motorised users may occur.

When considering the routing of construction traffic, numerous conflicting environmental impact are considered, before the solution with the least impact pursued. The strategy presented is considered to offer the least environmental impact. Numerous other environmental constraints would be presented along an internal track, including ecology areas and watercourses.

It is considered that the construction routes shown in **ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A]** [[AS-046](#)] are appropriate and are consistent with NPS policy.

The extract of Table 14.15: Construction Impact - Screening Assessment is shown on page 12 of the Party's submission.

A further review of sensitivity ratings was undertaken against the rating criteria outlined in Table 14.6 of **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [[APP-057](#)] and links reclassified accordingly for assessment.

We note the inclusion of Links 14 and 15 into the screening assessment tables and that the developer now seems to have re-classified many of the road's sensitivities. It's greatly concerning that the new addition roads that have been included to alleviate disruption in other areas have been classified as a high sensitivity, where previously there were no high sensitivity roads at all on the scheme. With similar concern we note the dramatic increase in

The justification for the sensitivity rating for Moorhouse Road and Weston Road is set out in Table 14.2 of **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [[APP-057](#)].

Frequency of trips of the Development is set out in Section A14.1.6 of the **ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]**. **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [[APP-057](#)] concludes that the effect of the increase traffic flow has been avoided where possible and otherwise minimised by careful design of the Development and the construction routes and access points. A summary of the traffic volumes changes. A monthly traffic generation during the construction phase is calculated based on a worst-case scenario and is presented in Table

Summary Position of Interested Party

Applicant’s Responses

Egmanton Parish Meeting [[RR-047](#)]

traffic numbers, particularly HGV traffic on these two roads. Moorhouse Road now being rated in the top three HGV traffic increases across the scheme. Quite simply, the roads are rural, single carriageway, and they serve only to provide access from residences within the villages and, for several weeks over the year, harvest farm traffic. They are not designed or adequate for twelve months of daily construction traffic. Paragraph 189 (in a later section) defines the anticipated construction traffic on Moorhouse Road to be one vehicle every two minutes. This vastly increases the interactions between construction and local traffic plus pedestrians, cyclists and equestrians. The inclusion of these two roads should be re-evaluated and the addition of internal haulage routes within the present site constraints should be reconsidered, to increase the safety and reduce congestion and vehicle and NMU interaction at the northernmost tip of the development.

A14.1.15 of **ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]**. Section 14.7.1 of the **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057]** states that 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.

14.7.1.3 Driver Stress and Delay

We do not agree with developers’ guidance that driver stress will not be a factor. We

The sections of road for traffic signals identified on **Traffic Regulation Measures Plan [EN010162/APP/2.13] [APP-032]** are intended only to be used the construction of the passing places, to provide sufficient space for workers. Following the completion of the

Summary Position of Interested Party

Applicant’s Responses

Egmanton Parish Meeting [[RR-047](#)]

have highlighted the developer’s intention for using what we understand will be nine sets of traffic signals (including additional signals which are not shown associated with passing points south of Hagg Lane, with that many traffic signal zones within the space of one mile there will undoubtedly be delays and frustration on the sides of local, farm and commercial traffic

passing places, the traffic signals would be removed and traffic operate under free-flow conditions.

14.7.1.5 Non-Motorised User Amenity

We have previously raised the subject of daily equestrian access, which can occur at any time. The developer acknowledges the presence of pedestrians and cyclists, within the following sections however makes no reference to the presence of equestrians, who through the nature of their transport are arguably the most susceptible to harm caused by the sudden noise and presence of any motor vehicles, especially HGVs. We would urge the developer to exercise more forethought in terms to equestrians and their particular vulnerability. Although we agree with the NMU significance of Moderate attached to NMU on Moorhouse road, we do not understand the subsequent hazard evaluation in tables. There does not appear

ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [[APP-203](#)] has been developed to ensure that the construction phase can be undertaken in a safe and efficient manner and includes measures such as reduced vehicles speeds and banksmen where conflict with non-motorised users may occur.

Section 14.4.10 of **ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [[APP-057](#)]** sets out the methodology for assessing Fear and Intimidation. A degree of hazard for the baseline determined using the criteria in Table 14.3 and scoring system in Table 14.4. The baseline score is then assessed against the construction phase score using the levels set out in Table 14.5.

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

to be any justification for the degree of hazard score despite the obvious uplift in traffic, particularly HGV traffic as shown in the extracts of Table 14.19: Fear and intimidation Assessment – Future Baseline and Table 14.20: Fear and intimidation Assessment – Construction are shown on page 14 of the representative's submission. The table shows the results overall in a "Very Low" result of fear and intimidation. This does not appear to be justified given that the IMEA weighting guidance is based on set values, with weighting figures that would seem to only be relevant within an inner-city area based on the frequency and flow of the traffic as shown in table 14.3 which does not take into account the presence of other rural hazards.

Landscape and Visual

Other Concerns

The parish would also like to clarify several other concerns related to the development mainly relating to the consultation response received back from the developers:

Visual Amenity

In relation to the outgrown hedgerow along the east side of Moorhouse Road near Hagg Lane, it is shown on the masterplan correctly as existing hedgerow. In the **ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP)** [EN010162/APP/6.4.5.1A] and **ES Volume 4, Appendix A5.1.1: oLEMP Appendix** [EN010162/APP/6.4.5.1.1] [[APP-202](#)]. These are shown as LEMP habitat 3, which includes in its specification that "*Where hedgerows are gappy/defunct, they will be in-filled using additional native species*". A clarification has been added to this specification to indicate

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

We raised concerns base on the visual amenity of both the local arrays N1 / N2 (previously called DB032). As well as the array on the hillside south of Moorhouse, both of which we feel will alter our view extensively and negatively. In terms of DB032 (N1) we raised the following comment: "Solar Array DB032, at stage 1 consultation residents privately raised concerns relating to winter screening of this array given the current modest screening in all seasons but particularly during the winter months. As at the time of writing this document, there are no leaves and a view of the field, which will house the prospective array, is clearly visible. The responses from the developer suggested that this could be supplemented as required." The developer has raised the following response: "An additional hedge will be provided 'inside' the existing tree belt at the west edge of DB032 where it adjoins Moorhouse Road". Whilst we thank the developer for their commitment to screening, we note from the available Landscape Masterplan Figure 5.2(6) Dated 26/06/2025 that no additional screening has been added to substantiate this commitment. We would like

that where supplementary planting is required to provide visual screening, it will be provided.

ES Volume 4, Appendix A5.1.1: oLEMP Appendix [EN010162/APP/6.4.5.1.1A] shows that the solar arrays in field N11 will be visible from Hagg Lane and short sections of Moorhouse Road at a distance of 1-1.7km. At this distance, especially given it would be shaded by the panels, the detail of cabling etc is not likely to be discernible and effects would be medium to medium/small scale during construction and early operation, reducing slightly as mitigation planting matures as illustrated by Figure 7.6 Visual Receptors - Before Mitigation and Figure 7.7 Visual Receptors - After Mitigation in **Environmental Statement Volume 3, Chapter 7 Landscape and Visual Impact Assessment Figures (Part 1 of 6) [EN010162/APP/3.7A] [AS-035]**. The design revision in field N11 after the PEIR was to address other potential impacts as set out at paragraph 99 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]**), but had incidental benefits in reducing the extent of panels visible from Hagg Lane and Moorhouse Road hence the previous response by the Applicant as quoted by Egmanton PC. The purpose of mitigation is not to remove all views of the Proposed Development, but to mitigate potentially significant effects and it is not considered that further mitigation is required in this location.

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

confirmation that this commitment will be honoured by the developer. We also raised comments that DB031 (Now N11) as follows: "Solar Array DB031, this array will be permanently viewable to a large degree for the entirety of the project's lifecycle due to the ground topology. We don't believe the proposed new woodland planting will provide any benefit in screening the development from our location due to the incline of the sloped land. At least the top two thirds of the development will be permanently viewable. As the panels will be south facing and at indeterminate (at this stage) height, it is difficult to understand the prospective visual impact of the development when viewed from behind, seeing the supporting structure, cabling and other technical infrastructure that is generally hidden below the panels themselves. We welcome the developer's commitments to reinstalling the surrounding wooded zone bordering the road, which was in the plan at inception, briefly removed following stage 1 consultation and then re-established for stage 2 consultation. Although this will provide no screening benefit from our perspective. Given the

Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [[RR-047](#)]

order limits tightly bound the north side of this array and the field orientation the only way to provide more screening from our perspective, would be removal of the array from the scheme". The developer returned with the following comments: "Solar panels have been set back slightly in DB031 to mitigate effects on the adjacent home". "Effects on views from Hagg Lane are considered in ES chapter 7, Landscape and Visual Impact Assessment [EN010162/APP/6.2.7]. Changes made to the design of the area to the east 15 (supplementing the existing tree belt) will reduce visibility of the Proposed Development from Hagg Lane as will the reduction in the northward extent of fields to the south (formerly area DB031). This will mean that the proposed tree belt is also further south and uphill, providing more screening in views from the north". While we understand the reasoning behind the reduction of this array and agree with mitigation for the neighbouring property, we note that the worst of the panel will still be viewable at the top of the development as they were previously for us and the

Summary Position of Interested Party	Applicant's Responses
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Egmanton Parish Meeting [RR-047]	
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mitigation will not have any effect for the majority of the site's operational timeframe.	
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<p>Representative Viewpoints</p> <p>We raised the subject of a lack of useful viewpoints submitted with the PEIR and noted that no viewpoints had been undertaken within our portion of the development. We noted the useful addition of Viewpoint 53, although were disappointed that the developer had decided that the inclusion of the representative wireframe and montage was not required around the northern quadrant. They were particularly useful in other areas for gauging the impact. We would ask the developer to reconsider our request, which we feel would provide reassurance on the narrative provided in the document "6.2.7 – Chapter 7 – Landscape and Visual".</p>	<p>Egmanton PC previously requested a viewpoint on Hagg Lane and this was provided as viewpoint 53 (see ES Volume 3, Figure 7.11: Visualisation Viewpoints (viewpoints 1-10, 13-18, 26-35, 37-38, 44-46, 48-55) [EN010162/APP/6.3.7A] [AS-036])</p> <p>The visualisations for viewpoint 53 include a photograph and wireline towards the arrays beyond Moorhouse Road as sheet A and views across the valley to the south as Sheet B – thereby covering both sectors of potential visibility towards the Proposed Development from Hagg Lane. It is not clear from the previous representations that a further viewpoint was potentially being requested and it is not clear from this representation which locations or effects Egmanton PC are seeking reassurance about.</p>
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<i>General</i>	
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<p>Cumulative Effect</p> <p>We would like to bring to the attention of the Planning Inspectorate the scale of solar development within our district, alongside</p>	<p>NPS EN-1 and EN-3 both clearly establish the need for the solar development. Section 3.3.62 of NPS EN-1 confirms that there is a Critical National Priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 2.10.10 of NPS EN-3 confirms the important role that solar needs to play in delivering the government's goals for greater energy independence. Therefore, large-scale ground mounted solar schemes such as the</p>
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Summary Position of Interested Party

Applicant's Responses

Egmanton Parish Meeting [\[RR-047\]](#)

the various sites agreed by the local planning services of Newark and Sherwood District. The developer claims that GNR Solar will cover 1650 hectares, deliver 800MW (a figure which remains despite a recent huge reduction of the solar arrays) and will supply enough energy to power 400,000 homes. But it is highly spread out and is a stark contrast to the other development falling into Newark and Sherwood District, "One Earth Solar Farm". Of which their developer claims to cover 1600 hectares delivering 740MW. Powering 200,000 residences. The GNR Solar development covers a vast amount of farmland and impacts on around 20 parishes, which is a stark contrast to the One Earth proposal, which although still consumes a massive area is still a compact placement and does not affect anywhere near as many residences and parishes. The number of solar arrays being planned, constructed and operated within Newark and Sherwood District is staggering. It's our feeling that the district already provides enough local solar commitment, including

Development are essential in order to meet the Government's targets. The need for the Development has been set out in **Statement of Need [EN010162/APP/7.2] [APP-324]**.

An assessment of cumulative effects of the Development with other developments has been undertaken as part of the EIA process as described in Section 2.3.8 of **ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045]** and **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]**. The shortlisted projects have subsequently been assessed within the relevant chapters of the Environmental Statement.

All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "*When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.*" These effects will be secured by implementation of the Development as described, together with the control measures as set out.

The Development's grid connection capacity is 800 MW. The Development is expected to power the equivalent of approximately 400,000 homes, based on average household electricity consumption figures from OFGEM of 2,700 kWh per annum⁴. The approach to calculating household consumption is consistent with industry standards.

The Applicant has provided further explanation on the homes powered equivalent calculation in the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19].

⁴ <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/average-gas-and-electricity-use-explained>

Summary Position of Interested Party	Applicant's Responses
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Egmanton Parish Meeting [[RR-047](#)]

Egmanton Solar Farm as well as other low carbon facilities such as biomass energy (such as the unit already operating between Egmanton and Weston). Despite the very similar power rating, we are also concerned regarding the differing claims suggested by these developers and how the number of properties claimed are being substantiated. An overview showing the Cumulative impact on Newark and Sherwood can be found in appendix 3 of the Party's submission.

3.11 FORESTRY COMMISSION

Table 3-10 Responses to Forestry Commission

Summary Position of Interested Party	Applicant's Responses
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Forestry Commission [[RR-056](#)]

Ecology and Biodiversity - Ancient Woodland/ Veteran Trees

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed

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/6.4.8.3A]. Effects on these features are assessed in **ES Volume 2, Chapter 8: Ecology and Biodiversity** [EN010162/APP/6.2.8] [[APP-051](#)].

Summary Position of Interested Party

Applicant's Responses

Forestry Commission [\[RR-056\]](#)

development could have on trees and woodland including ancient woodland.

There are no ancient woodlands within the proposed order area, however there are several directly adjacent to the to the area, including High Wood (ASNW), Muskham Wood (ASNW), Spring Wood (ASNW), Cheveral Wood (ASNW/PAWS), Dukes Wood (ASNW), Carlton Wood (ASNW), North Wood (ASNW) and an area of Speakers Plantation (ASNW). We also note that 9 veteran trees have been identified on site.

The site also contains several small fragmented areas of mixed deciduous woodland, with more adjacent on the boundary.

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

The Standing Advice on Ancient Woodland was considered at an early stage in the design resulting in 15 m buffers of all woodland and trees, as set out in the **Design Approach Document [EN010162/APP/5.6A]** and as referenced in **ES Volume 4, Appendix A8.12: Arboricultural Impact Assessment (AIA) [EN010162/APP/6.4.8.12]**.

Measures to avoid or reduce the risk of adverse effects on woodland and trees during construction are provided in section A5.3.11.3.2.1 of **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP)**

Summary Position of Interested Party

Applicant's Responses

Forestry Commission [\[RR-056\]](#)

Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states:

“The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.”

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 Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that

[EN010162/APP/6.4.5.3A]. This includes a commitment to increase the size of the default 15 m root protection area if a tree is identified as ancient or veteran.

The potential effects of air quality (including dust emissions) on ancient woodlands are assessed as not significant in **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059]**. Mitigation to achieve this outcome is secured in **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**.

ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] includes woodland creation and tree planting to increase the amount of these habitats. Woodland and ecotone creation around existing woodlands, including ancient woodlands and Local Wildlife Sites, will provide benefits to them by reducing the diffuse effects of agriculture, reducing 'edge effects', and increasing woodland connectivity.

Summary Position of Interested Party

Applicant's Responses

Forestry Commission [[RR-056](#)]

can result from a significant increase in traffic or dust from construction.

The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer requirement will be increased.

While the application states that that a 15m buffer will be afforded to the Ancient Woodland, it is the minimum which would be expected for a small scale development. In our view there is reasonable doubt that deterioration of the ancient woodlands could still occur as a result of the proposed development, especially considering the number of ancient woodlands affected by the development.

As a large scale project, this proposal has scope to exclude significant amounts of farmland from the deer range in this area. This is likely to increase herbivore browsing and grazing to other areas in close proximity to the site. Impacts are likely to increase in surrounding woodlands and the wider landscape, where hedgerows and

Summary Position of Interested Party

Applicant’s Responses

Forestry Commission [\[RR-056\]](#)

stewardship schemes are likely to be impacted upon.

Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland.

There are several isolated fragmented areas of mixed deciduous woodland both within the order area and adjacent to it.

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England). They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”.

Woodlands of various types, including Priority Habitats, are identified in **ES Volume 4, Appendix A8.3: Habitats and Vegetation Baseline [EN010162/APP/6.4.8.3A]**. Effects on woodlands are assessed in **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8]** [\[APP-051\]](#).

Measures to avoid or reduce the risk of adverse effects on woodlands during construction 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/6.4.5.3A]**. **ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]** includes woodland creation and tree planting to increase the amount of these habitats and to increase landscape connectivity (i.e., reducing fragmentation). Woodland and ecotone creation around existing woodlands, including ancient woodlands and Local Wildlife Sites, will provide benefits to them by reducing the diffuse effects of agriculture, reducing ‘edge effects’, and increasing woodland connectivity

Summary Position of Interested Party

Applicant's Responses

Forestry Commission [[RR-056](#)]

Paragraph 187b of the NPPF (Dec 2024) states:

“Planning policies and decisions should contribute to and enhance the natural environment recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

Fragmentation is one of the greatest threats to mixed deciduous woodland. Loss of habitat connectivity is a particular concern where the woodland would become isolated in its landscape and surrounded by development on several sides.

These woodlands can also suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.

Summary Position of Interested Party

Applicant's Responses

Forestry Commission [[RR-056](#)]

Ancient and veteran trees are also irreplaceable habitats.

The Joint NE/FC Standing Advice states that for ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.

The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals).

Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

We note that veteran trees will be afforded a suitable buffer to prevent any potential

ES Volume 4, Appendix A8.12: Arboricultural Impact Assessment (AIA)

[[EN010162/APP/6.4.8.12](#)] [[APP-225](#)] describes how all ancient woodland and veteran trees will be retained. Measures to avoid or reduce the risk of adverse effects on these features 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/6.4.5.3A](#)]**. This includes a commitment to increase the size of the default 15 m root protection area if a tree is identified as ancient or veteran.

Summary Position of Interested Party

Applicant’s Responses

Forestry Commission [\[RR-056\]](#)

effect. Any effect from the incursion into RPA’s of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.

The application includes planting of an additional 31.09ha of woodland, plus lines of trees, tree belts, wood pasture, scattered trees, community orchard and ecotone consisting of woodland edge and graded habitats. This will result in a significant increase in canopy cover and habitat connectivity throughout the site. Habitat connectivity and biodiversity will be further improved in areas where tree belts and ecotone link with existing woodlands and the wider site.

Some Ancient woodland buffer areas could be improved by the addition of ecotone or further woodland planting rather than grassland between the ancient woodland and the development, providing a better buffer and woodland edge.

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope

Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] provides details about woodland creation, tree planting, and ecotone creation. The locations of many of these habitats have been selected to maximise their potential to benefit existing, retained woodlands, including ancient woodlands and Local Wildlife Sites.

Table A5.1.3 of the LEMP states that nursery stock will be of local provenance and will be sourced with the supported of Sherwood Forest Trust. The supply chain will adhere to all necessary biosecurity requirements and this commitment will be included in the final LEMP.

The candidate species list for proposed woodland and tree planting includes a wide range of native species. The species selected for specific locations will be confirmed in the final LEMP in consultation with the LEMP Steering Group and with reference to the Forestry Commission Ecological Site Classification Tool.

ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] addresses the movement of terrestrial animals and how this has been considered as part of the Development design. Overall patterns of animal movements are anticipated to be largely unchanged during the operation of the Development.

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]**.

Summary Position of Interested Party

Applicant's Responses

Forestry Commission [\[RR-056\]](#)

with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, especially in areas where there are ancient woodlands.

With a changing climate, a wide species selection will be beneficial, mixed woodland is usually of maximum benefit for habitat provision. Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland. Perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.

Large scale fencing will change how deer move through the landscape, (Redacted) There is already a high risk of deer collisions within the site area. An assessment of any increase of this risk

Summary Position of Interested Party

Applicant's Responses

Forestry Commission [[RR-056](#)]

should be undertaken, if culls occur prior to development, the risks should reduce.

Good Landscape Design

To meet planning policy and Government guidance, we would recommend:

- Robust adherence to the Standing Advice, especially regarding buffer zones, to rule out loss or deterioration to the ancient woodlands or veteran trees.
- Plans mentioned detailing the protecting measures for existing trees and woodland on site are adhered to.
- Maintain and where possible improve woodland condition, especially ancient woodland.
- Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges.
- Woodland edge creation especially in areas around ancient woodland as part of a mosaic of habitats.
- A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the

It is considered that Ancient Woodland and Veteran Trees matters have been appropriately considered in the **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]**. Mitigation as set out in **Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]** and **ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]** would be secured through the **Draft DCO [EN010162/APP/3.1B]** , including Requirement 8 (LEMP) and Requirement 12 (CEMP).

Summary Position of Interested Party	Applicant's Responses
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Forestry Commission [[RR-056](#)]

long term maintenance of all new and existing woodland within the site.

We hope these comments have been useful to you. If you require any further information, particularly on woodland creation and connectivity or deer control, please don't hesitate to contact me.

3.12 COUNCILLOR KEITH MYERS MELTON

Table 3-11 Responses to Councillor Keith Myers Melton

Summary Position of Interested Party	Applicant's Responses
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Councillor Keith Myers Melton [[RR-106](#)]

General - Cumulative

As the District Councillor for Trent Ward of Newark and Sherwood DC I am currently receiving many emails from local residents concerned about the issues surrounding this development, hence my registration.

The three key areas where the LPA Planning Committee at NSDC decided the original application for the Kelham solar farm failed to achieve acceptability were the local heritage issue (Kelham Hall), loss of

An assessment of the Kelham Conservation Area and its associated heritage assets is provided in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054]** at paragraphs 254 to 265. It concludes that with the proposed enhancement, the Development will not be appreciable from within the historic core of the Conservation Area (where the listed assets are located) and this is not expected to affect the significance of the individual assets within the Conservation Area. Change within the setting of the conservation area is considered to be not significant in EIA terms.

The Applicant has responded to the BMV matter at the row below.

Summary Position of Interested Party

Applicant's Responses

Councillor Keith Myers Melton [[RR-106](#)]

high grade farm land and the issue of cumulation of "industrialisation". The latter two are also problematic for the very much larger GNR Solar project and there may be other issues of heritage value that apply in some places.

An assessment of cumulative effects of the Development with other developments has been undertaken as part of the EIA process as described in Section 2.3.8 of **ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [[APP-045](#)]** and **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]**. The shortlisted projects have subsequently been assessed within the relevant chapters of the Environmental Statement.

Cumulative effects with existing and consented developments, as well as other proposals in planning or at earlier stages are considered in the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [[APP-050](#)]** and some of these effects are identified as being significant (see Table 7.6), but these have been minimised as far as possible through the embedded design and mitigations.

Cumulative effects with other developments in planning are considered in Section 7.10.7 of the ES, which recognises that landscape and visual cumulative effects will predominantly arise from the SSE BESS to the west of Averham, and One Earth, Kelham and Foxholes solar farms. No new significant effects have been identified.

Whilst some significant adverse effects on landscape and visual have been identified, there would not be a conflict with NPS EN-1 and EN3. NPS EN-1 recognises that virtually all NSIPs will have 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 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.

Summary Position of Interested Party

Applicant's Responses

Councillor Keith Myers Melton [[RR-106](#)]

For my part, though, the most contentious issue is the Cumulation of Industrial sites across a landscape, which I represent, which is primarily rural in characteristic. The extant Newark and Sherwood Local Development Framework; Allocation and Development Management; Development Plan Document, dated July 2013 (referred to, from now on, as the DPD) indicates that the land to be allocated for new "Employment Land" purposes, for the whole NSDC district, should be just over 225 Hectares through to 2026. I am the local Member for Trent Ward and happen to live in the village of Staythorpe, so I am very conscious of the fact that just the two new BESS projects in Staythorpe and Averham alone add more than 50 hectares of Employment Land. If the Kelham Solar farm appeal is won by the developers, another 65 hectares would be added to that total. And if the GNR Solar project goes ahead yet another 73 hectares of employment land would be added just in the single Parish Council area of Averham, Kelham and Staythorpe parish.

For background and information, Employment land is defined as land allocated or in use for business, general industrial and storage/distribution uses as defined by Classes E(C), E(G), B2 or B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended) or with an extant planning consent for such uses.

It should be noted that solar and BESS are types of infrastructure and not be considered to be an employment use. The Development is defined as a Nationally Significant Infrastructure Project under sections 14(1)(a), 15(1) and 15(2) of the PA 2008 as it is for the construction of an onshore generating station in England with a capacity exceeding 50 MW. Therefore, policies relating to employment land are not considered relevant in this context.

As one of the significant benefits of the Development, the Development would provide a number of direct local full time equivalent ('FTE') jobs during the construction, manufacturing, operation, and maintenance phases. The matter of job creation and direct and indirect economic benefits has been supported by NSDC as stated in the **Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2]**.

Summary Position of Interested Party

Applicant's Responses

Councillor Keith Myers Melton [[RR-106](#)]

That total reaches nearly 189 hectares or a massive 83% of the total land allocated for "Employment Land" allocated over the WHOLE NSDC district in the DPD through to 2026. Since we also have a large Power Station and a large National Grid complex already in the parish, I believe the cumulative effect of this provides an unrealistic burden upon a very modest, but otherwise delightful rural Parish area. This is especially true when you consider that the underlying reason for proposing the development here, in the first place, is to provide a gateway to send renewable energy down South to the massively populated South East urban sprawl – just because there is a Grid connection here in Staythorpe.

Socio-economics, Tourism and Recreation

There is no indication that any equivalent benefits will be forthcoming specifically to local residents to offset the losses of amenity and convenience caused by this centralised process.

Socio-Economic community benefits range from employment opportunities, training, local supply chain opportunities and educational opportunities.

The provision of a compensation is not a material consideration within the EIA assessment.

The Applicant is committed to providing support to the community and local businesses through employment generation, supply chain benefits during construction and operation and various skills and education initiatives. Benefits are summarised in Table 13.14 of the

Summary Position of Interested Party

Applicant's Responses

Councillor Keith Myers Melton [[RR-106](#)]

ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13] [[APP-056](#)] and are outlined in Section A13.2.1.2 of the **ES Volume 4, Appendix 13.2: Outline Skills, Supply Chain and Employment Plan (OSSCEP) [EN010162/APP/6.4.13.2] [[APP-274](#)]**. Measures include:

- Providing apprenticeships during the various phases of the Development;
- Providing other workforce training to employees and the local community for earlier stage Development focussed renewable industry skills through the EG (Elements Green) Academy;
- Providing renewable energy education and careers through the EG Academy;
- Providing local employment opportunities; and

Providing local business networking and support.

It is anticipated that the SSCE activities and outputs would be fully in delivery once construction has started. Effective performance monitoring will also be delivered to ensure the plan is achieving its goals and contributing to the over-arching vision and to provide relevant feedback.

The proposed measures are secured in **ES Volume 4, Appendix 13.2: OSSCEP [EN010162/APP/6.4.13.2] [[APP-274](#)]**. Requirement 17 of the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a skills, supply chain and employment plan in relation to that phase has been submitted to and approved by NSDC. The management plan secures that it must identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with the construction, operation and decommissioning of the authorised development, and the means for publicising such opportunities.

3.13 KIRKLINGTON PARISH COUNCIL

Table 3-12 Responses to Kirklington Parish Council

Summary Position of Interested Party	Applicant's Responses
Kirklington Parish Council [RR-110]	
<i>Principle of Development and Cumulative</i>	
<p>The Parish Council is concerned about the sheer scale of the development both on its own, but also in terms of the cumulative effect this will have when viewed with other projects in the Newark area - the area is disproportionately disadvantaged.</p>	<p>Both NPS EN-1 and EN-3 clearly establish the need for the delivery of a large amount of solar generation capacity. It is an essential element required for delivery of the Government's energy objectives and legally binding net zero commitments. 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.</p> <p>An assessment of cumulative effects of the Development with other developments has been undertaken as part of the EIA process as described in Section 2.3.8 of ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045] and ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]. The shortlisted projects have subsequently been assessed within the relevant chapters of the Environmental Statement.</p> <p>All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "<i>When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.</i>" These effects will be secured by implementation of the Development as described, together with the control measures as set out.</p>

Summary Position of Interested Party	Applicant's Responses
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Kirklington Parish Council [\[RR-110\]](#)

Land Use

The classification of land is felt to be unsatisfactory as it will mean the loss of a lot of land that could be used for farming. This is part of overall over-intensification when other smarter options do not appear to have been reviewed (or at least them being ruled out has not been explained), such as adding solar panels to roofs of buildings.

The survey has been carried out by qualified and experienced surveyors at a detailed level, and it follows NE's guidance., It provides the classification of land required in order to understand and assess impacts of the Proposed Development, including the amount of BMV. and the results are provided in **ES Volume 4, Appendix 17.1: Agricultural Land Classification Survey [EN010162/APP/6.4.17.1] [APP-288] [APP-289]**.
 Considering alternative technologies and design such as roof-mounted solar or other technologies is not a relevant policy requirement, other than in relation to flood risk, BMV land, compulsory acquisition, and habitat sites, all of which are considered in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]**.

3.14 KNEESALL, KERSALL, AND OMPTON PARISH COUNCIL

Table 3-13 Responses to Kneesall, Kersall, and Ompton Parish Council

Summary Position of Interested Party	Applicant's Responses
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Kneesall, Kersall, and Ompton Parish Council [\[RR-111\]](#)

Land Use

Our Parish Council objections to the Great North Road Solar and Biodiversity Park. The development removes vast areas of grade 3 agricultural land from food

The Applicant has taken account of ALC grading and agricultural land productivity throughout the design process for the Development and has sought to minimise the amount of BMV land included in the Order Limits. **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]** justifies that there are no other alternative sites within the

Summary Position of Interested Party

Applicant's Responses

Kneesall, Kersall, and Ompton Parish Council [[RR-111](#)]

production which is believed to be the Best and Most Versatile (BMV) land.

We consider ourselves a forward thinking parish but what we wish to ensure is maintaining the provision of this agricultural land for the future generations of farming and food production.

We accept diversity within the farming industry but refuse to let the agricultural classification be lost within this diversification, ie. This land is returned to its original status and classification on the decommissioning of this project.

search area (15 km from the POC) that could fulfil the requirements of the Development that would have a lesser effect on BMV agricultural land.

The Development is temporary in nature which retains the ability to reinstate arable agriculture after decommissioning. At the end of the Development's operational phase, the decommissioning phase would include the removal of Work no. 1 (Solar PV) and Work no. 5a (BESS) with the land being returned to the landowner and restored for agricultural use. Other elements, including the substations and some of the habitats created as part of the Development, may be retained depending on the need for this equipment for other purposes at that time. Further details of the decommissioning phase works are set out in section 5.7 of **ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [[APP-048](#)]** and **ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**. Requirement 19 of Schedule 2 in the **Draft Development Consent Order [EN010162/APP/3.1B]** requires a decommissioning and restoration plan to be submitted to NSDC for approval in consultation with NCC.

Traffic and Access

The proposed construction traffic access routes within our parish are already requiring pothole repairs and pose an ongoing issue.

Some of the outlined routes do already carry HGV status but the extra strain on the infrastructure and condition of these roads is only going to deteriorate with the additional usage. As a parish if we had some form of grant or funding which we could draw down

Effects of construction traffic and transport noise and vibration on road users have been assessed in **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [[APP-057](#)]** and **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [[APP-055](#)]**.

Non-motorised users (including equestrians) are considered in the **ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [[APP-057](#)]** and measures are identified in **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)]** in areas with an increased likelihood of interaction. **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)]** confirms that prior to construction works commencing,

Summary Position of Interested Party	Applicant's Responses
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Kneesall, Kersall, and Ompton Parish Council [RR-111]	
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<p>on to ensure regular maintenance, especially during the build stage, would be beneficial.</p>	
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<p>Emissions from the additional vehicles also need to be considered as our parish is home to a primary school and also a playgroup. We are also home to an equestrian centre and a horse training facility, with the unpredictable nature of such animals, it is hoped that suitable risk assessments have been carried out.</p>	<p>roads to be used for construction will be subject to a condition survey and any remedial measures needed to facilitate the works agreed with the local highway authority and completed. Further interim surveys and post-completion condition surveys will also be conducted and any agreed corrective measures undertaken.</p>
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<p>We also have a number of cyclists, horse riders, and pedestrians, with and without children, using our roads and footpaths.</p>	<p>In terms of the noise impacts on road users, all non-motorised users are considered. Section 12.4.2 of ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055] confirms that all Noise Sensitive Receptors (NSRs) have been placed to identify all residential, leisure (including hotels and campsites), community services (including village halls and crematoria) and education (schools etc.) uses within the 500 m operational study area have been identified. The assessment concludes that with the embedded design and mitigation measures which would be secured, the effects from noise during the construction phase are not expected to be significant. ES Volume 4, Appendix A5.3: Outline Construction and Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A] has been prepared by the Applicant and includes a list of noise mitigation measures. In addition, Requirement 12 in Schedule 2 of the Draft Development Consent Order [EN010162/APP/3.1B] prevents any phase of the Development commencing until a CEMP for that phase has been submitted to and approved by NSDC. Each CEMP must be prepared in accordance with the aforementioned Outline CEMP.</p>
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	<p>As such, the Development is in accordance with NPS EN-3.</p>
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<i>Noise and Vibration</i>	
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<p>The increased noise during the construction phase will affect many within our parish and although it is inevitable and hopefully short lived.. if we could have an assurance from</p>	<p>Noise during construction will be controlled through measures set out in ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]. This includes a range of noise control measures, including limiting construction works to certain times only.</p>
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Summary Position of Interested Party	Applicant's Responses
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Kneesall, Kersall, and Ompton Parish Council [RR-111]	
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Elements Green that it would only take place between certain hours it might dissipate some of the negative effect.	To ensure the precise management and mitigation measured properly reflect the final design of the Development to be constructed, the final CEMP will be submitted to the Council for approval prior to construction. This is secured by a requirement of the Draft DCO [EN010162/APP/3.1B]
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<i>Socio-economics, Tourism and Recreation</i>	
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<p>The impact on our wildlife, hedgerows, and plants will be significant during construction and operational phases as will the effect on tourism, especially accommodation/hospitality sectors, including our cafe/ice cream parlour, and farm shop. Other socio-economic impacts will be the queuing traffic at certain times on our main roads, particularly Mondays and Fridays when a large local employer, Center Parcs, and Forest Holidays, have their changeover days.</p> <p>We would also like you to consider the potential loss of employment particularly in agriculture and its associated industries.</p>	<p>ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] concludes that the Development has been assessed as having no significant adverse effects, whilst significant beneficial effects are predicted for LWS, habitats and breeding birds during the operation of the Development.</p> <p>An assessment of the effects of the Development on tourism is provided in Section 13.8.5 of the ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13] [APP-056] This assesses the potential effects on tourist and recreational receptors from environmental assessments elsewhere in the Environmental Statement, concluding that the significance of the effect is considered to be Low Adverse.</p> <p>The assessment calculates a negligible economic loss (0.0138%) for the Newark and Sherwood visitor economy due to the Proposed Development. Furthermore, the Development would have positive economic effects due to construction worker temporary accommodation demand.</p> <p>In addition, the assessment states in paragraphs 327 to 328 “The baseline assessment has found that, within the area around the Order Limits, short-term rental holiday accommodation is sparsely populated. The majority (c.89%) of the short-term holiday accommodation are situated, as seen in Figure 13.3, in locations such as Newark, Southwell, Winthorpe, Ollerton, Wellow and Edwinstowe.</p> <p>In these locations the accommodation is unlikely to be impacted by noise or visual impacts.”</p>
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Summary Position of Interested Party

Applicant's Responses

Kneesall, Kersall, and Ompton Parish Council [[RR-111](#)]

It is concluded that there will be no significantly adverse effects on the tourist economy.

Regarding traffic congestion, Paragraph 290 of the assessment identifies that no significant effects have been identified in the Outline Construction Traffic Management Plan, and it concludes that there is not expected to be any impact on those using road networks to visit tourist attractions in the study area.

The Applicant has outlined the employment effects during construction and operation within section 13.8.1 of the **ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13] [APP-056]**. It concludes that during the construction phase there will be 120 local net direct construction FTE jobs and 60 local net direct manufacturing FTE jobs. Furthermore, during the operation phase there will be 20 net direct local FTE jobs. 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).

Landscape and Visual

From a parishioner viewpoint the significant adverse visual amenity impact is of greatest immediate concern; lets face it... these solar panels are not pretty or easy on the eye! Especially in the great volume that are being proposed, and hiding them will not be easy. Especially affected in our parish are the properties on Kneesall Road and fronting the A616

Visual impacts on Kneesall, Kersall and the surrounding areas are assessed in sections 7.7.10.5 and 7.7.10.6 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** which identifies significant effects on the rural areas east of Kneesall and around Kersall; and paragraphs 48 and 49 of **ES Volume 4, Appendix A7.5: Non-Significant Effects [EN010162/APP/6.4.7.2] [APP-212]** which identify non-significant effects at Kersall, and negligible effects within and to the west and northeast of Kneesall.

Summary Position of Interested Party	Applicant's Responses
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Kneesall, Kersall, and Ompton Parish Council [RR-111]	
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	Effects on homes are considered in ES Volume 4, Appendix A7.6: Residential Visual Amenity Assessment (RVAA) [EN010162/APP/6.4.7.6] [APP-213] where they lie within 250m of the solar arrays, substations or BESS.
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<i>Ecology and Biodiversity</i>	
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<p>The fields to be panelled within the parish currently provide natural habitats for protected species which will be lost (ground nesting birds such as lapwing and skylarks) or severely altered.</p>	
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<p>Although not a favoured pursuit of all, our land is used by the Readyfield bloodhounds and also the Grove and Rufford hunt, this pursuit is part of our heritage and removing these panelled fields from their rides restricts and puts more pressure on remaining land. We also have game bird breeding and shooting areas which maybe adversely affected or need relocating.</p>	
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	<p>A range of baseline studies has been undertaken to establish the status and distribution habitats and species in the area of the parish within 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 ground-nesting birds, are assessed in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051], which concludes that there will be no significant adverse effects.</p>
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	<p>ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A] provides an assessment of the combined recreational amenity effects that may result from visual, noise, traffic, glint, and glare impacts. Countryside pursuits, such as shooting and hunting, are a popular form of recreation within the Development area. The outmost extent of the Order limits encloses a total area of 19,406 ha, extending 12 km east-west and 15 km north-south. Within this, only 1,765 ha, or approximately 9% of that area, falls within the Order Limits due to the C-like shape of the Development. Within the Order Limits, only 1,061 ha, or 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, as shown by the Development layout in Environmental Statement Volume 3, Chapter 5 Development Description Figures (Parts 1 to 3) [EN010162/APP/3.5A] [AS-032] [AS-033] [AS-034]. This will result in a minor loss of area for local countryside pursuits. In accordance with the assessment methods set out in section 18.4.4 of ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A], it is not a likely significant effect in terms of the EIA Regulations.</p>
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Summary Position of Interested Party

Applicant's Responses

Kneesall, Kersall, and Ompton Parish Council [[RR-111](#)]

Flood Risks, Drainage and Water

Climate change is already having a negative impact on all our lives as we see dramatic weather events, by removing vast areas of agricultural land with deep rooted hedges and crops facilitating drainage. By removing these we are adversely affecting flood risk.. that is not to say that solar panels per se cause flooding. To date as a parish we are fortunate that we have not suffered significantly to flooding, however seeing the devastation it has caused to neighbouring parishes and other countries surely it is in all our interests to look to preventative methods for future proofing this risk.

As outlined in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**, 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.

Occasional maintenance will occur limiting the potential for ruts to be created compared to the agricultural baseline scenario where heavy farm machinery traverses the Site.

The timing of this work could also avoid periods when the ground surface may be particularly wet, as outlined in the **ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2]**. The intention is for the grass around the panels to be grazed by sheep thereby further reducing the need for mechanical management.

The Development is likely to provide beneficial effect on surface water run-off rates compared to the baseline agricultural scenario, as the fields within the Site will no longer be:

- Ploughed or furrowed;
- Left without vegetation cover for long periods in the winter; and
- Regularly traversed by heavy farm machinery.

An outline site maintenance plan will be developed to ensure any areas of compaction are remediated, while **ES Volume 4, Appendix A5.1: Outline Landscape and Ecological**

Summary Position of Interested Party	Applicant's Responses
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Kneesall, Kersall, and Ompton Parish Council [RR-111]	
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	Management Plan (LEMP) [EN010162/APP/6.4.5.1A] outlines measures to ensure the grassland sward establishes.
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3.15 LAXTON & MOORHOUSE PARISH COUNCIL

Table 3-14 Responses to Laxton & Moorhouse Parish Council

Summary Position of Interested Party	Applicant's Responses
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Laxton & Moorhouse Parish Council [RR-113]	
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General

The locality

The small village of Moorhouse, accessed solely by single and narrow track lanes, sits in ancient agricultural land. Strip farming is still practised in Laxton and is held nationally as the most complete and well documented example of farming in medieval times.

The District Council's Land Character Assessment (LCA), gives the Moorhouse area its highest rating in both character and conservation requirement, describing Moorhouse as having strongly unified elements and few distracting features with a high landscape sensitivity. It includes a number of sites of significant of scientific interest and biological SINC designations highlighting a strong habitat for wildlife, with good hedgerow networks leading into woodland. Their recommendations for

The Applicant's responses to the effects on landscape, heritage, biodiversity, and flood risk are set out in the following rows of this table.

In terms of the concerns raised in relation to the site selection and food security, **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]** confirms that reasonable alternatives have been studied. The alternatives for design and locations have been adequately assessed, as presented in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]**. The Site are also considered as part of the Sequential and Exception Test Report (Appendix C of **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**).

BMV land is one of the influencing factors in the site selection process. Through a systematic and iterative site selection process, the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the **Planning Statement [EN010162/APP/5.4A]** concludes that the temporary disturbance

Summary Position of Interested Party

Applicant's Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

Moorhouse Meadows include maintaining existing historic field patterns, conserving and enhancing ecological diversity of the woodland/vegetation, conserving the sparsely settled and open rural character and promoting measures for reinforcing the traditional character of the existing farm buildings.

As the hamlet lies in a shallow hollow, not only will the visual and flood impact on this rural community will be significant for all properties, the parish council has received representations that significant noise reverberation in the "hollow" would have significant mental health implications for its residents. In addition, the removal of farming assets will also see farming disappear permanently from the community and the area, negatively impacting the unique historic antecedents of the locality and composition and wellbeing of the community.

Moorhouse contains several significant heritage assets, notably the nationally significant Grade II* listed Moorhouse Chapel, an attractive and notable landscape feature. Other listed buildings in Moorhouse, include the 18th century farmsteads of Church Farmhouse, Aggrie House, and North Park Farmhouse.

Whilst the parish council is not against renewable energy initiatives in principle these should be balanced with food security needs and impact on the renewable resource location. Whilst the East Midlands comprises 13% of

of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region.

In relation to noise, an assessment of noise effects is provided in **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12]** [[APP-055](#)]. The assessment concludes that the Development would not result in a significant noise impact.

Summary Position of Interested Party

Applicant’s Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

England’s farmed area, together with the South East, it has the highest crop output of DEFRA’s 8 farming regions in England [1] in a country that is only 60% sufficient in total food production [2]. The use of best most valuable agricultural land (BMV) for solar arrays compromises food security.

The East Midlands is not a good area for solar farm placement. Placing the same array in other areas would experience greater irradiated solar energy for more sunshine hours per year. As an alternative to farmland, there is extensive commercial south facing roofing which could be employed for solar capture and their distributed nature would lessen the need for significant distribution infrastructure upgrades.

Flood Risk, Drainage and Water

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, and is currently suffering from flooding to its properties, roads, hedgerows and where Moorhouse Beck and a number of tributaries meet. Laxton is surrounded by higher farmland and consequently receives its surface water run off.

It is acknowledged that Moorhouse has previously flooded and Solar PV was removed from Flood Zones 2 and 3 along Moorhouse Beck before the Application was submitted. 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]**, extensive grassland planting will cover the ground surface of the entire PV array areas managing any surface water runoff generated from the PV arrays.

Summary Position of Interested Party

Applicant’s Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

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 woods [6]. 2023 saw Moorhouse Beck overwhelmed through Moorhouse causing flooding or near flooding to a number of properties. 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. Research on the impact of solar panels on runoff, Biamonte et al’s empirical research shows that peak runoff is significantly increased from a field with solar panels compared to the same field with no panels.

Full analysis of any flood alleviation measures in the surrounding area as part of the scheme is required and must assess and address any potential impact on Moorhouse.

Any actions that exacerbate runoff will undoubtedly widen the flood damage area and should not be allowed.

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.

The Biamonte *et al.* (2023) study referenced in **RR-113** shows increase in flow from PV panels draining onto bare earth, as shown in Figure 2 of the research paper, where a mock-up of a PV array drains onto bare ground within a vineyard.

As outlined in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**, there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows, however where ground beneath panels is bare there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water from the PV arrays therefore not contributing to or exacerbating existing flooding downstream of the Site.

Cultural Heritage and Archaeology

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

The contribution made by setting to the significance of Moorhouse Chapel is set out in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054]**. The assessment noted that the nearest PV array lies approximately 500 m to the east. Existing intervening hedgerows partially screen the array location and additional native species would be

Summary Position of Interested Party

Applicant's Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

(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 5.5% of the 374,081 listed buildings in England are Grade II*). 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 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 there should be no solar arrays in the vicinity of the church which are visible either from the church or in views of the church should be removed Moorhouse Chapel.

planted to infill gaps and along sections of lower density in order to increase screening and further hedgerow planting is proposed at the edge of the array. PV arrays will introduce a new, industrial element into the otherwise rural character of the landscape near to the chapel changing the appreciation of that character. However, the key relationship between the chapel, farmstead and hamlet will remain unaffected and overall the introduction of the proposed array within the surroundings of the asset will result in a slight degree of change to an element of the asset's setting which makes a negligible contribution to its significance.

Assessment of other heritage assets at Moorhouse are set out in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [[APP-054](#)] and **ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2A]**.

Summary Position of Interested Party

Applicant’s Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

The proximity of arrays even in the post consultation density will have an adverse visual and environmental impact on the immediate vicinity and the rural character of the historic village of Laxton and its unique open field system as recognised by section 23 Administration of Justice Act 1977 and a parliamentary undertaking.

Landscape and Visual

A largescale conversion from open fields to solar arrays has disastrous consequences for the nature of the landscape and the local identity. Solar panels dramatically alter the nature and views of the countryside and the key features that punctuate it. Visual impact from and of the hamlet must be protected.

The enclosure of rural footpaths change them into sterile walkways rather than vantage points for appreciation of heritage assets and rural vistas. The planned hedging exacerbates rather than mitigates the loss of such views. This historic countryside is an amenity, enjoyed by many local residents and visitors. Mental health, particularly male suicide, is a significant aspect of concern for rural communities. Such losses from the countryside in the parish are likely to have a negative effect on health and wellbeing within the community and to those who visit to seek solace from its vistas.

In responding it is assumed that ‘the hamlet’ being referred to is Moorhouse. As set out at section 7.7.10.7 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** and as illustrated by Viewpoint 13 in **ES Volume 3, Figure 7.11: Visualisation Viewpoints (viewpoints 1-10, 13-18, 26-35, 37-38, 44-46, 48-55) [EN010162/APP/6.3.7A] [AS-036]**, visibility of the solar arrays from Moorhouse would be limited during construction and early operation and the solar arrays would be screened once mitigation planting has matured.

Double hedged routes are not atypical of the area, particularly for example to the east of Moorhouse. The assessment provided in **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]**, identifies that in some places where open views are important, adverse effects will remain after hedges have grown due to the loss of open views – for example the public rights of way to the northeast of Moorhouse as shown in **ES Volume 3, Figure 7.7: Visual Receptors After Mitigation [EN010162/APP/6.3.7A] [AS-035]**.

The CCTV cameras will be focussed inside the fences and not towards people walking past on public rights of way.

Summary Position of Interested Party

Applicant’s Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

Continuous rows of glass panels completely alter landscape character whilst security fencing and the intrusion of CCTV destroys the peace and tranquility.

Ecology and Biodiversity

The area is significant for rare and declining farmland and/or woodland birds, in particular the lapwing, which is classified as red (Birds of Conservation Concern 5: the Red List for Birds (2021)), a priority species (UK Post-2010 Biodiversity Framework) and near threatened global IUCN Red List of Threatened Species).

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.

It has been identified that solar farms can have a

The area is significant for rare and declining farmland and/or woodland birds, in particular the lapwing, which is classified as red (Birds of Conservation Concern 5: the Red List for Birds (2021)), a priority species (UK Post-2010 Biodiversity Framework) and near threatened global IUCN Red List of Threatened Species).

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.

It has been identified that solar farms can have a

The survey methods in **ES Volume 4, Appendix 8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4] [APP-217]** follow good practice and are a standardised and repeatable method to determine the breeding status and location of birds. Lapwing has been recorded in the Order Limits and potential effects are assessed in section 8.8.15 of **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]**

Laxton Sykes SSSI is 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 it are assessed in section 8.8.6 of **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]**

A range of baseline studies 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]**. The potential effects on these features, including North Wood and Speaker’s Plantation, are assessed in **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]**.

Measures to avoid or reduce the risk of adverse ecological effects during construction, operation and decommissioning are secured in the following management plans:

Summary Position of Interested Party

Applicant’s Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

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 the current proposal. pIn 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

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 the current proposal. pIn 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

- **ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**
- **ES Volume 4, Appendix 5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A]**
- **ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**

ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] includes measures to enhance, create and manage habitats for the benefit of wildlife.

The Applicant also notes that the approach to biodiversity and wildlife mitigation 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]

Summary Position of Interested Party

Applicant’s Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

food. In particular, the proposed fields that border North Wood and Speakers plantation woodland, would have a major ecological impact on wildlife. In effect the solar park proposals in this area would surround long established wildlife rich woodland, effectively cutting it off for many species and have an adverse impact on many species during construction.

food. In particular, the proposed fields that border North Wood and Speakers plantation woodland, would have a major ecological impact on wildlife. In effect the solar park proposals in this area would surround long established wildlife rich woodland, effectively cutting it off for many species and have an adverse impact on many species during construction.

Landscape and Visual Impact

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. Laxton still operates a strip farming system under the Court Leet which is protected by a parliamentary undertaking given by the Thoresby Estate. In its Land and Character Assessment (LCA), Newark and Sherwood District Council describe the Moorhouse Meadows landscape condition as good, but sensitivity as

The extent of the Moorhouse Meadowlands Policy Zone is identified on a small inset map at page 188 of the Newark and Sherwood Landscape Character Assessment SPD, and is shown below (in red), compared to the solar areas (blue hatch). As can be seen the proposed solar arrays largely avoid this area as part of the design approach as noted in Table 7.3 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)]. Paragraph 8 describes this area in more detail of **ES Volume 4, Appendix A7.5: Non-Significant Effects** [[EN010162/APP/6.4.7.2](#)] [[APP-212](#)] and as shown below, just one arable field (of atypical character for this policy zone) to the east of Moorhouse Beck

Summary Position of Interested Party

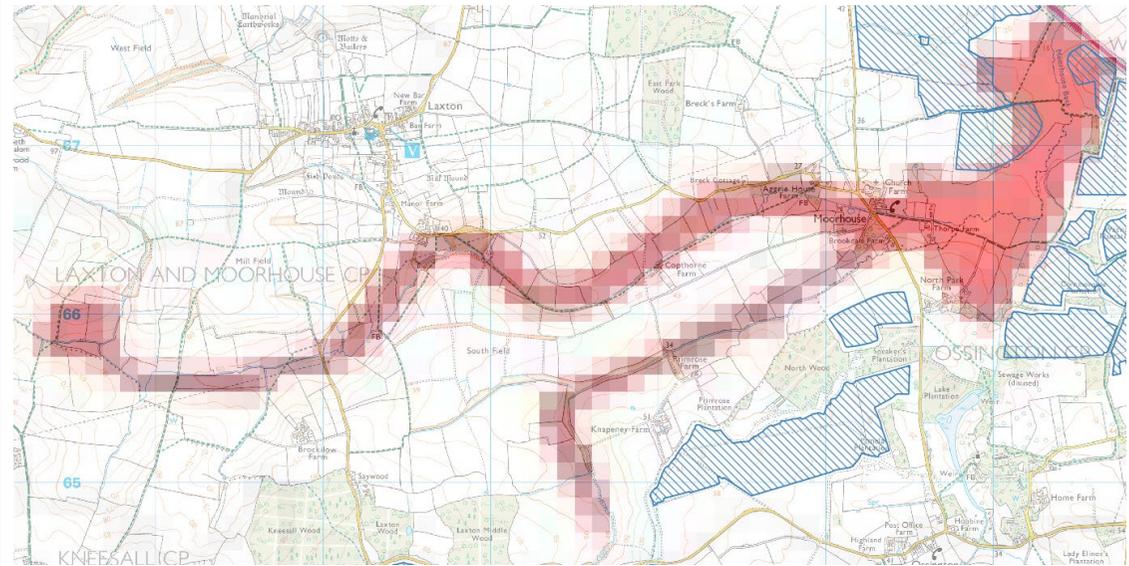
Applicant's Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

high with an overall aim of conserve. It considers Moorhouse to have strongly unified elements and few distracting features.

The identified fields around Moorhouse should be spared from development which would change its historic and agriculturally important nature.

adjacent to the A1 would be the only part of the Moorhouse Meadowlands to include solar arrays.



Traffic and Access

Assurances are sought that compliance with the traffic management plan will be robustly monitored and enforced and restrictions observed.

Requirement 14 in Schedule 2 of the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC. This must be in accordance with the **ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [[APP-203](#)]** and must be implemented as approved.

Summary Position of Interested Party

Applicant's Responses

Laxton & Moorhouse Parish Council [[RR-113](#)]

It is a criminal offence (under Section 160 of the Planning Act, 2008) to breach DCO Requirements; this can lead to prosecution and fines.

3.16 LAXTON AND MOORHOUSE SOLAR CONCERNS

Table 3-15 Responses to Laxton and Moorhouse Solar Concerns

Summary Position of Interested Party

Applicant's Responses

Laxton and Moorhouse Solar Concerns [[RR-114](#)]

General Objection

We would oppose the development on the following points: Exacerbation of flooding issues The irrevocable damage to the local environment The permanent change to the rural characteristics of the countryside surrounding Moorhouse and its significant heritage assets Loss of best most valuable land

It is acknowledged that Moorhouse has previously flooded and Solar PV was removed from Flood Zones 2 and 3 along Moorhouse Beck.

As shown in Plate 9.2 of **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]**, 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]**, 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.

The Applicant has also responded to the matters related to the landscape, heritage and the BMV land in Sections 4.4, 4.10 and 4.11 of this Report.

Summary Position of Interested Party	Applicant's Responses
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Laxton and Moorhouse Solar Concerns [\[RR-114\]](#)

The **Planning Statement [EN010162/APP/5.4A]** 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.

3.17 LINCOLNSHIRE AGAINST NEEDLESS DESTRUCTION

Table 3-16 Responses to Lincolnshire against needless destruction

Summary Position of Interested Party	Applicant's Responses
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Lincolnshire against needless destruction [\[RR-119\]](#)

General – Cumulative Impact

We are primarily concerned with cumulative impact of excessive energy infrastructure in Lincolnshire, we examine each project individually and collectively and comment accordingly

The Applicant has adopted a staged approach to the identification of cumulative developments, which generally follows PINS guidance.

ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [\[EN010162/APP/6.2.2\]](#) [\[APP-045\]](#) describes the four-stage process adopted by the Applicant. **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2** [\[EN010162/APP/6.4.2.1A\]](#) provides a full list of cumulative developments considered in that process, which then identifies a list of developments to be considered as part of the Stage 3 and 4 cumulative effects assessment.

Summary Position of Interested Party

Applicant's Responses

Lincolnshire against needless destruction [[RR-119](#)]

Each environmental aspect has been assigned a different ZOI based on industry guidance. As such, each topic assesses the cumulative effect of the Development with other shortlisted projects, depending on the ZOI adopted.

ES Volume 3, Figure 2.1A: Socio Economic Zone of Influence [EN010162/APP/6.3.2A] [[AS-029](#)] and **ES Volume 3, Figure 2.1B: Other Zones of Influence [EN010162/APP/6.3.2A] [[AS-029](#)]** show other developments and buffer zones to illustrate different ZOIs.

All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 identifies that: "*When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.*" These effects will be secured through implementation of the Development as described, together with the control measures set out.

3.18 MICK GEORGE LIMITED

Table 3-17 Responses to Mick George Limited

Summary Position of Interested Party	Applicant's Responses
Mick George Limited [RR-138]	
<i>Property</i>	
<p>S56 Notice - Ref S56-028</p> <p>The company has an Option for Mines & Minerals on land affecting the DCO. The land is underlain by high quality mineral (sand & gravel) which has previously been included in Nottinghamshire's emerging Mineral and Waste Local Plan.</p> <p>The company objects to the DCO unless the mineral is worked prior to the solar project proceeding. Discussions with Element Green prior to the S56 Notice demonstrated the mineral could be worked and the land restored in a timely manner without compromise to the project. We maintain that assessment.</p>	<p>ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10] [APP-053] identifies and assesses the likely significant effects of the Development on the nature and extent of the MSAs. It was informed by ES Volume 4, Appendix A10.9:Mineral Resource Assessment [EN010162/APP/6.4.10.9] [APP-238] which concluded that the safeguarded mineral resources would not be permanently sterilised by the Development given its temporary nature and the safeguarded resource would subsequently be available for extraction at some point in the future. The County Council minerals officer has concurred with the conclusions of the MRA.</p> <p>The Interested Party has a Category 2 land interest (an Option Agreement for a minerals lease) over land which is principally required for the BESS (Work 5A on Sheet 2 of the Works Plans [EN010162/APP/2.3A] [AS-005]) comprising parcels 2/46, 2/47, 3/1, 3/3 over which full compulsory acquisition powers are sought by the Applicant and which are shown coloured pink on Sheets 2 and 3 of the Land Plans EN010162/APP/2.2B] [.</p> <p>The Option also affects the following Order Land: [<u>Land shaded pink on the Land Plans EN010162/APP/2.2B] over which full acquisition powers are sought:</u></p> <ul style="list-style-type: none"> - Plot 2/45 - required for Work No.5B (400kv Substation) - Plots 2/6, 2/42 – required for Work No.2 (Cable) - Plots 2/7, 2/16, 2/22, 2/28 - required for Work No.3 (Mitigation)

Summary Position of Interested Party

Applicant's Responses

Mick George Limited [[RR-138](#)]

- Plots 2/10, 2/26, 2/41 - required for Work No. 8 (Access)

- Plots 2/46, 2/47, 3/1, 3/3 - required for Work No. 5A (BESS)

Land shaded blue on the **Land Plans EN010162/APP/2.2B** over which new rights and/or restrictive covenants are sought:

- Plots 2/5, 2/18, 2/19, 2/20, 2/21, 2/31, 2/40 – Cable Rights and Cable Restrictive Covenant for the purpose of Work No.2 (Cable)

- Plots 2/9, 2/11, 2/17, 2/24, 2/29 - Access Rights for the purpose of Work No.8 (Access)

Land shaded yellow on the **Land Plans EN010162/APP/2.2B** which is not proposed to be compulsorily acquired:

- Plots 2/8, 2/23, 2/25, 2/37 required for Work No. 3 (Mitigation)

As noted in the **Land Rights and Negotiations Tracker [EN010162/APP/4.4A]** [rows 43-45 the Applicant is in advanced negotiations for an Option with the freehold owners of the land, the subject of the minerals option, so as to facilitate the Development. The Applicant has been in negotiations with the Interested Party regarding the potential impact of the Development on the mineral option. The Applicant understands that the Interested Party does not have planning permission to extract the minerals, nor has a planning application been made by the Interested Party. The Applicant is not aware of the Interested Party's programme for the extraction of minerals nor whether it has a viable proposal to do so. The likelihood that the Development will conflict with a scheme for mineral extraction in this location is therefore unknown.

Notwithstanding, the Applicant continues to seek to negotiate appropriate terms with the Interested Party. In the event that agreement cannot be reached, the Applicant requires powers of compulsory acquisition in the **Draft Development Consent Order**

Summary Position of Interested Party

Applicant's Responses

Mick George Limited [[RR-138](#)]

[[EN010162/APP/3.1B](#)] [[AS-012](#)] to ensure that the Development can proceed. The Interested Party would be entitled to compulsory purchase compensation in the event its interest is compulsorily acquired, extinguished or otherwise interfered with pursuant to the powers in the **Draft Development Consent Order [[EN010162/APP/3.1B](#)]**

Ground Conditions

Locating the project on this land will sterilize the underlying mineral, if not permanently then, for a very long period of time. This is unnecessary and contrary to mineral policy guidance and the National Planning Policy Framework (NPPF).

ES Volume 2, Chapter 10: Ground Conditions and Land Contamination
 [[EN010162/APP/6.2.10](#)] [[APP-053](#)] identifies and assesses the likely significant effects of the Development on the nature and extent of the MSAs. It was informed by **ES Volume 4, Appendix A10.9:Mineral Resource Assessment [[EN010162/APP/6.4.10.9](#)] [[APP-238](#)]** which concluded that the safeguarded mineral resources would not be permanently sterilised by the Development given its temporary nature and the safeguarded resource would subsequently be available for extraction at some point in the future. The County Council minerals officer has concurred with the conclusions of the MRA.

3.19 MATTHEW ARNOLD

Table 3-18 Matthew Arnold

Summary Position of Interested Party	Applicant's Responses
Matthew Arnold [RR-132]	
<i>Landscape and Visual</i>	
<p>This project is happening in very close proximity to our family home which is set in a unspoiled rural area within 300-400 metres away. After viewing the proposed scheme the affects specifically to us will be the view from our house will be spoiled by a "Glass Field ".</p>	<p>Views of the development from homes more than 300m from the Proposed Development are not considered in detail as effects would not have the potential to reach the RVA threshold as set out in sections A7.6.1-A7.6.2 of ES Volume 4, Appendix A7.6: Residential Visual Amenity Assessment (RVAA) [EN010162/APP/6.4.7.6] [APP-213]</p>
<p>A further major concern to us is that as the proposed field is on a 30 degree angle facing our house already after the solar panels have been fitted we effectively have a mirror shining into our house on a sunny day. This cannot be allowed surely as not only will the development of that particular field ruin the aspects and views from our property but cause a visual issue re the glare and most probably make our house unsaleable in the future or greatly de value it which isn't fair as we have worked long and hard to buy this property.</p>	<p>The modelling and prediction of glint and glare effects takes local terrain into account, as detailed in Section 5.2 of ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]. As such, any increase in the duration of effects due to an incline in the terrain are inherently included in the presented results. 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.</p> <p>See response above in relation to views / visual amenity.</p> <p>Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law.</p>

Summary Position of Interested Party

Applicant's Responses

Matthew Arnold [\[RR-132\]](#)

General

Along with the issues we will face listed above after the proposed development has been created we will also have the building and development traffic, infrastructure problems, road closures, access etc the list goes on. I oppose this development in its entirety as i feel it could be built in areas previously used for industry and not destroy the countryside .

ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057] presents the findings from the assessment of the potential transport related environmental effects. With the secured mitigation, the assessment concludes that the effects of the Development on highway safety and disruption of access for the pedestrians, cyclists and drivers and road condition are not significant. **ES Volume 4, Appendix A14.2: Outline Travel Plan [EN010162/APP/6.4.14.2] [APP-284]** has been developed to support **ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [APP-203]** to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised.

Requirement 14 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]** requires that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC.

In terms of the alternative brownfield sites, **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]** confirms that reasonable alternatives have been studied. The alternatives for design and locations are presented in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]**. BMV land is one of the influencing factors in the site selection process. Through a systematic and iterative site selection process, the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the **Planning Statement [EN010162/APP/5.4A]** concludes that the temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region.

3.20 NORTH MUSKHAM PARISH COUNCIL

Table 3-19 Responses to North Muskham Parish Council

Summary Position of Interested Party	Applicant's Responses
North Muskham Parish Council [RR-162]	
<i>General – Cumulative Impact</i>	
<p>The PC is deeply concerned about the cumulative impacts of the GNR proposal, particularly due to its excessive size and the additional solar developments in the surrounding area. The additional substantial industrialisation of the countryside, including existing utilities, transport, and mineral extraction in the Newark and Sherwood district, could create a significant overall adverse cumulative impact on the rural landscape character in this area of north Nottinghamshire and the bordering area with Lincolnshire.</p> <p>In addition to the GNR proposal, several other solar developments are planned or proposed in the area, including</p> <p>Muskham Woods - Approved on appeal Knapthorpe - Approved on appeal</p>	<p>Existing developments are considered as part of the baseline. Proposed developments, that may be part of the future baseline, are identified using an approach that follows PINS guidance. Stages 1 and 2 (other developments to be considered in the assessment of cumulative effects) are described in Section 2.3.8 of ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045] and ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A].</p> <p>Sites identified to be considered in the assessment of cumulative effects include, amongst others:</p> <ul style="list-style-type: none"> • The A46 upgrade; • Changes to mineral extraction proposals; and • Solar and BESS proposals. <p>Stages 3 and 4 are reported by environmental topic as appropriate in chapters 7-19:</p> <ul style="list-style-type: none"> • Section 7.9 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050] • Section 8.9 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]

Summary Position of Interested Party

Applicant’s Responses

North Muskham Parish Council [[RR-162](#)]

One Earth - Examination stage

Barnby in the Willows - Application submitted

Kelham - At appeal stage

Foxholes - At appeal stage

BESS Staythorpe - Approved

BESS Additional at Staythorpe - Application submitted

Existing gravel extraction is being further extended closer to North Muskham, and the British Sugar factory is located just 1.5 miles away. The upcoming A46 bypass further exacerbates the industrialisation of the region.

The cumulative impacts of these developments are likely to have significant consequences, including:

Loss of traditional rural landscape

Increased traffic congestion during construction and ongoing disruption for residents

- Section 9.8 of **ES Volume 2, Chapter 9: Water Resources** [[EN010162/APP/6.2.9](#)] [[APP-052](#)]
- Section 10.8 of **ES Volume 2, Chapter 10: Ground Conditions and Land Contamination** [[EN010162/APP/6.2.10](#)] [[APP-053](#)]
- Section 11.10 of **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology** [[EN010162/APP/6.2.11](#)] [[APP-054](#)]
- Section 12.8 of **ES Volume 2, Chapter 12: Noise and Vibration** [[EN010162/APP/6.2.12](#)] [[APP-055](#)]
- Section 13.9 of **ES Volume 2, Chapter 13: Socio-economics and Tourism** [[EN010162/APP/6.2.13](#)] [[APP-056](#)]
- Section 14.10 of **ES Volume 2, Chapter 14: Traffic and Transport** [[EN010162/APP/6.2.14](#)] [[APP-057](#)]
- Section 15.6 of **ES Volume 2, Chapter 15: Climate Change** [[EN010162/APP/6.2.15](#)] [[APP-058](#)]
- Section 16.2.7 of **ES Volume 2, Chapter 16: Miscellaneous Issues** [[EN010162/APP/6.2.16](#)] [[APP-059](#)]
- Section 17.8 of **ES Volume 2, Chapter 17: Agricultural Land** [[EN010162/APP/6.2.17](#)] [[APP-060](#)]
- Section 18.8 of **ES Volume 2, Chapter 18: Recreation** [[EN010162/APP/6.2.18A](#)]

All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, “*When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial*

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

Degradation of the physical and psychological benefits of the countryside

Increased noise and vibration

Visual dominance and loss of tranquillity

Potential negative impact on the psychological and physical health of our rural communities

The current rate of solar development in Newark and Sherwood is unprecedented, and the district is at risk of being overwhelmed by these projects. The cumulative impact of multiple large-scale solar installations could result in significant environmental degradation and loss of agricultural land.

The PC believes it is essential for decision-makers to have a comprehensive view of all proposed projects, rather than assessing each scheme in isolation. Without coordinated oversight, the Trent Valley could be irrevocably altered. A link to a simple Youtube video prepared by the Local Joint Parishes Action Group (JPAG) that shows the cumulative affect locally can be found at the following link: (REDACTED)

effect by actively reversing the risk of severe climate change relative to the baseline scenario."

These effects will be secured by implementation of the Development as described, together with the control measures as set out.

The Applicant has not identified any Planning application for a solar farm at Barnaby Willows and so there are no confirmed details on what such a scheme would be, and what planning status it would have.

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

Landscape and Visual Impact

Impacts on Rural Landscape Character and Visual Impact

The GNR Solar Park has an unusual circular design, which significantly increases its overall footprint. The proposed site will affect a much larger area than initially anticipated, and many residents, both within and outside this area, will experience adverse effects. The potential visual impact should be carefully reconsidered given the site's unique configuration.

8. Although screening plans have been proposed, the PC is concerned that effective screening will not be realised for several years. The PC requests that more mature trees and shrubs be incorporated into the plan, with a comprehensive maintenance strategy to ensure long-term effectiveness, well beyond the short-term timelines provided. The capacity of the local planning authority at Newark and Sherwood District Council is not capable of monitoring and enforcing this level of effective screening.

The extent of the Proposed Development has been reduced since the scoping and PEIR stages as described and illustrated in the **Design Approach Document [EN010162/APP/5.6A]** Visual effects would now arise within a reduced area compared to the designs proposed at those stages.

Visual effects of the Proposed Development are assessed in **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** and **ES Volume 4, Appendix A7.5: Non-Significant Effects [EN010162/APP/6.4.7.2] [APP-212]**.

The planting of hedgerows as mitigation for solar farms is a recommended approach as set out at paragraph 2.10.131 of EN-3 National Policy Statement for Renewable Energy Infrastructure. The majority of the mitigation relies on the growth of existing hedges, which would be effective more quickly than new planting – as set out at paragraph 107 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]**. Hedges along northern boundaries would also include tree planting as set out in Table 7.3 and shown on the **Landscape Masterplan [EN010162/APP/2.11] [APP-030]**. This approach is not used along other boundaries in order to avoid trees shading solar arrays.

Summary Position of Interested Party

Applicant’s Responses

North Muskham Parish Council [[RR-162](#)]

18. The PC is concerned that the reduction in local farm traffic will result in increased fly-tipping. A detailed plan and budget for dealing with this issue should be incorporated into the project.

Traffic and Access

Traffic, Routes, and Access

Construction traffic is expected to increase the flow of heavy vehicles on the A1, which runs very close to North Muskham. The A1 is a major trunk road, and its use is unavoidable, but it adds to the cumulative impact on the village.

After leaving the A1 or other major roads, construction vehicles will pass through North Muskham on the Great North Road and the A616 at a small mini-roundabout. The PC believes this roundabout cannot accommodate the volume of heavy goods vehicles (HGVs) that will be required.

The PC is also aware of frequent accidents, delays, and roadworks on the A1, which significantly affect local traffic. The proposal does not adequately address contingency planning for these issues, and the PC

As noted, construction traffic will use the A1 is a major trunk road and already carries large volumes of traffic, including HGVs as part of its strategic role. The road is considered appropriate for use and the cumulative impact on North Muskham from traffic on the A1 is considered to be negligible.

Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP)

[EN010162/APP/6.4.5.2] [[APP-203](#)] provides a framework for the management of construction vehicle movements to and from the Development, and secures measures to reduce vehicle trips to the Development. Mitigation measures include:

Section A5.2.4.2 of the management plan secures measures to control timings of construction vehicle movements in avoiding peak hour travel to mitigate potential capacity constraints.

Section A5.2.4.1 of the management plan secures the **ES Volume 4, Appendix 14.2: Outline Travel Plan [EN010162/APP/6.4.14.2]** [[APP-284](#)] which includes measures for the provision of shuttle buses to transport construction workers to and from the Order. A detailed version of the Outline Travel Plan, is to be finalised at detailed design stage.

Requirement 14 in Schedule 2 of the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC. This must

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

requests that a clear, enforceable plan be developed.

Given local knowledge, it is likely that some HGVs will take alternative routes, either inadvertently or as a result of GPS misdirection. The PC asks that the developer provide clear guidance on how these deviations will be avoided, including enforcement measures.

The PC also requests that a contact number be provided for immediate resolution of traffic-related issues during construction and operation, ideally staffed by a local site office with authority to address local concerns.

Safety concerns regarding the level crossing at Vicarage Lane in North Muskham also need to be addressed. The PC suggests further safety measures be incorporated to prevent traffic delays or accidents caused by the frequent train crossings on the East Coast Main Line.

The PC requests that the GNR developer coordinate with other local developers to create a unified traffic plan, especially as several solar projects and the Newark

be in accordance with the **ES Volume 4, Appendix 5.2: Outline CTMP**

[EN010162/APP/6.4.5.2] [[APP-203](#)] and must be implemented as approved. This will take regard to cumulative schemes in the area to ensure that traffic measures are coordinated.

Section A5.2.5.2.1 of **Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP)** **[EN010162/APP/6.4.5.2]** [[APP-203](#)] sets out that when unplanned events occur on the A1, HGVs will be held on site and deliveries paused.

Section A5.2.5, Section A5.2.7.4 within **Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP)** **[EN010162/APP/6.4.5.2]** sets out that drivers must comply with the routing shown on **ES Volume 3, Figure 14.1: Traffic and Transport Study Area** **[EN010162/APP/6.3.14A]** [[AS-046](#)]. These will be set out in the **Draft DCO** **[EN010162/APP/3.1B]** and it is a criminal offence (under Section 160 of the Planning Act, 2008) to breach DCO Requirements; this can lead to prosecution and fines.

Section A5.2.7.12 of **Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP)** **[EN010162/APP/6.4.5.2]** confirms that a community engagement contact will be made available. Contact details will be made available prior to commencement of construction.

ES Volume 3, Figure 14.1: Traffic and Transport Study Area **[EN010162/APP/6.3.14A]** [[AS-046](#)] shows that construction traffic will not route along Vicarage Lane.

It is not considered necessary to install ANPR cameras at North Muskham. Routing compliance will be a requirement within the **Draft DCO** **[EN010162/APP/3.1B]** .

There is no evidence to suggest that any reduction in traffic associated with the operational stage would result in any increase in fly-tipping.

A dedicated point of contact has been committed to by the Applicant during both the construction and operational stages of the Development. These are set out within the **Outline Construction Environmental Management Plan (CEMP)**

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

bypass upgrade are expected to occur simultaneously.

To assist with enforcement, the PC requests that an Automatic Number Plate Recognition (ANPR) system be installed at key entry points to the North Muskham village to help monitor and deter unauthorised HGV traffic.

The PC is concerned that the reduction in local farm traffic will result in increased fly-tipping. A detailed plan and budget for dealing with this issue should be incorporated into the project.

19. In the event of issues related to hedging, screening, or fly-tipping, the PC requests a direct line to a named individual by the developer or local office responsible for resolving these concerns.

[EN010162/APP/6.4.5.3A] and the **Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A]**, and would be secured through the **Draft DCO [EN010162/APP/3.1B]** , Requirement 12 (CEMP) and Requirement 13 (OEMP).

Flood Risk, Drainage and Water

Flooding and Hydrological Impacts

Despite some areas being removed from the DCO submission, parts of the site remain subject to flooding risks.

As outlined in **ES Volume 4, Appendix A9.1: Flood Risk Assessment**

[EN010162/APP/6.4.9.1B] the Development is located primarily within Flood Zone 1, with a small footprint of the Work Area 3 located within Flood Zone 2 and 3. Areas of Work Area 3 located in Flood Zone 3 will comprise grassland, scrub, an orchard and scattered trees,

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

The potential for changes in rainfall patterns and surface runoff, exacerbated by climate change, should be fully considered. The PC requests a more detailed analysis of the impact on water courses and flood risks.

The PC also asks that measures be implemented to guarantee that areas not previously prone to flooding do not become more vulnerable.

The potential impact on aquifers and groundwater in the area should be fully assessed and included in the environmental considerations.

which is compatible with the EA's "Working with natural processes to reduce flood risk 2024" FCERM research report.

Work Area 2 (Cables) will be located entirely below ground and in waterproof ducting, ensuring no loss of floodplain storage or conveyance.

Work Area 6: National Grid Staythorpe Substation, is located in Flood Zone 2 and, despite modelling showing shallow depth inundation for the 1 % AEP + 30 % CC and 39 % CC (i.e. less than 0.1 m depth), is unlikely to flood due to the presence of private flood defences which serve the operational substation with an elevation of 13.10 m AOD.

Work Area 7: Consented Staythorpe BESS and Connection has incorporated flood resilient design and the connection point is likely to be in an area modelled to be outside the 1 % AEP + 39% CC event.

The Development will incorporate planting and land management measures (RSuDS) which will reduce the potential for an increase in surface water runoff rates.

Hardstanding areas will be served by surface water drainage infrastructure (SuDS) to limit surface water runoff to greenfield (baseline) rate up to the 1 % AEP + 40 % CC event.

The Development is classed as Essential Infrastructure, as per Annex 3: Flood risk vulnerability classification, of the NPPF, which is appropriate in the Flood Zones 1, 2 and 3, in terms of flood risk vulnerability.

Effects on groundwater / aquifers are assessed in **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]** which concludes no significant effects on the groundwater resource.

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

Land Use

Use of Best and Most Versatile (BMV) Land
Significant portions of the proposed development area are classified as BMV land, currently used for arable farming. The PC objects to the use of this high-quality agricultural land for solar energy generation, which should be avoided.

The PC is skeptical about the viability of sheep grazing under solar panels. Evidence suggests that this is not a sustainable or effective use of land, particularly on BMV land.

Given the apparent trend for substantially lower crop yield we suggest that the adequate availability of good agricultural land is increasingly essential if the country is to have sufficient self sufficiency in food production that will not entail additional CO2 liability with an increasing need to import more.

ES Volume 2, Chapter 4: Alternatives [[EN010162/APP/6.2.4](#)] [[APP-047](#)] confirms that reasonable alternatives have been studied. The alternatives for design and locations have been adequately assessed, as presented in **ES Volume 2, Chapter 4: Alternatives** [[EN010162/APP/6.2.4](#)] [[APP-047](#)], The Site was also considered as part of the Sequential and Exception Test Report (Appendix C of **ES Volume 4, Appendix A9.1: Flood Risk Assessment** [[EN010162/APP/6.4.9.1B](#)]).

The consideration of BMV land is one of the influencing factors in the site selection process. Through a systematic and iterative site selection process, the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the **Planning Statement** [[EN010162/APP/5.4A](#)] concludes that the temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region.

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

Ecology and Biodiversity

Ecology and Biodiversity

The PC is concerned that the proposal lacks sufficient evidence on the ecological impacts of the development. The potential effects on wildlife, including rare species like Barn Owls, Deer, and Hen Harriers, Otter and shrew, have not been adequately considered.

The PC requests that further studies be conducted to assess the impact of the development on local wildlife, particularly in relation to the disruption caused by the loss of mature hedges, fencing and changes in natural migration and movement patterns.

The proposal should also include measures to restore and enhance local biodiversity, in line with recommendations from Natural England and the State of Natural Capital Report for England 2024. Adequacy of Consultation

ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [[APP-051](#)] includes an assessment of the potential effects on a wide range of sensitive habitats and species, as well as designed sites, and in doing so assesses the effects of hedgerow loss, fencing and changes to wildlife movements.

Measures to avoid or reduce the risk of adverse environmental 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/6.4.5.3A]

ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]

ES Volume 4, Appendix 5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A]

ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] includes measures to enhance, create and manage habitats for the benefit of biodiversity in line with prevailing good practice and with the support of a Steering Group.

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

Health, Safety and Security

Battery Energy Storage Systems (BESS) and Fire Risk

BESS systems have a history of safety concerns, including the risk of fires and explosions. The PC requests that these risks be thoroughly assessed and addressed in the development plans. Potential Negative Impact on the Psychological and Physical Health of our Rural Communities

The PC is concerned about the long-term health effects of exposure to electromagnetic fields generated by solar panels, particularly given that the panels will remain in place for 40 years.

The industrialisation of the countryside could negatively impact the mental and physical health of local residents, particularly those who moved to the area to enjoy its natural beauty.

The PC requests that measures be implemented to monitor and address any

The BESS has been carefully sited away from residential properties. The nearest receptors to the BESS unit are located at Flash Farm and Kelham, approximately 550 metres and 750 metres away, respectively. The site selection process is detailed in **ES Volume 2, Chapter 4: Alternatives** [[EN010162/APP/6.2.4](#)] [[APP-047](#)].

The BESS layout has been designed to mitigate fire risk and prevent firewater contamination, as outlined in **Concept Design Parameters and Principles** [[EN010162/APP/7.14A](#)]. **ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP)** [[EN010162/APP/6.4.5.4A](#)] provides proactive measures aiming to deter the spread of fire should it occur on-site. Measures include fire safety arrangement, monitoring, emergency response plan and maintenance schedule. On this basis, **ES Volume 2, Chapter 16: Miscellaneous Issues** [[EN010162/APP/6.2.16](#)] [[APP-059](#)] concludes that the risk associated with a potential fire in a battery unit is not a significant effect.

Requirement 7 in Schedule 2 to the **Draft DCO** [[EN010162/APP/3.1B](#)] secures that prior to the commencement of Work No.5A a FSMP must be submitted to and approved by Newark and Sherwood Council in consultation with Nottinghamshire Fire and Rescue Service and the Environment Agency. This must be in accordance with the **ES Volume 4, Appendix 5.4: Outline FSMP** [[EN010162/APP/6.4.5.4A](#)] and must be implemented as approved.

Potential effects of electromagnetic fields are assessed in section 16.6 of **ES Volume 2, Chapter 16: Miscellaneous Issues** [[EN010162/APP/6.2.16](#)] [[APP-059](#)], which concludes that no significant effects from electromagnetic fields are anticipated, and hence there are no anticipated effects on human health from electromagnetic fields.

A Human Health Impact Assessment (HHIA) has been undertaken to consider key determinants to protect human health and it is provided in Section 16.4 of the **ES Volume 2, Chapter 16: Miscellaneous Issues** [[EN010162/APP/6.2.16](#)] [[APP-059](#)]. The

Summary Position of Interested Party

Applicant’s Responses

North Muskham Parish Council [[RR-162](#)]

health and well-being issues related to the development. True Environmental Impact

assessment has considered the interrelationships of impacts informed by other chapters in the ES on residents and subsequent effects on health and wellbeing.

The outcome of the HHIA concludes that the Development is unlikely to negatively affect people’s health and wellbeing in its widest sense. There are no effects that:

- Cause potentially severe or irreversible negative effects;
- Affect a large number of people; or
- Specifically, may affect people who already suffer poor health or are socially excluded.

The Applicant has also provided an adequate consultation and has maintained an open discussion with the public throughout the design process, aiming to reduce uncertainty for local people as far as possible and to prevent any physical or psychological impact from an early stage of the Development.

General

The PC believes that the consultation process, particularly regarding the NG+ scheme, was unclear and caused confusion among local residents. The distinction between what would be included in the DCO and what might be granted voluntarily by the developer was not well communicated.

Community Benefit Fund

The Applicant has also committed to providing a Community Benefit Fund linked to the Development called ‘NG+’ to provide a comprehensive package of support to the community. The 5 Pillars of NG+ are: the Local environment; Education; Food security; Well-being and Energy efficiency. A website has been established to provide further information on NG+ (www.ngplus.uk) and a forum to engage with the local community.

“NG+ developments” are environmental and socio-economic enhancement works that are being offered as part of the community benefit scheme.

NG+ is the term for the money, or projects-in-kind, that will be provided voluntarily to the community by the Applicant during the operational phase of the Development. NG+ is being

Summary Position of Interested Party

Applicant's Responses

North Muskham Parish Council [[RR-162](#)]

led by the developers of GNR in consultation with the local communities. These would proceed if, and only if, the Development proceeds, subject to any required planning permission being secured, and their implementation is anticipated to take place post-consent and pre-construction of the Development.

The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the effects of the Development. Therefore, the SoS cannot, and should not, apply any weight to the Community Benefit Fund when balancing the positives and negatives of the Development. The Community Benefit Fund is therefore not taken into account in consideration of the planning balance within the **Planning Statement [EN010162/APP/5.4A]**.

31. While the benefits of solar power are acknowledged, the PC is concerned that the environmental impact of construction materials and the production of solar panels has not been adequately addressed. The PC requests assurances that the materials used will not contribute significantly to carbon emissions.

32. The use of large scale solar projects such as these are highly injurious to the character of the local rural landscape, its communities and its cultures.

The possible impacts of the Development on the climate throughout its construction, operation, and decommissioning phases has been assessed and the assessment is provided in **ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15]** [[APP-058](#)].

The Applicant expects (but cannot commit at this time, as explained in Section 15.5 of the Chapter) to achieve substantial reductions in carbon footprint (relative to that assessed in this chapter) through procurement of the solar PV mounting structures, by:

- Sourcing steel for the solar PV mounting structures from UK-based suppliers, avoiding the carbon footprint from shipping steel internationally;
- Sourcing steel from manufacturers that use electrical arc-furnaces rather than fossil-fuel-fired furnaces;
- Transporting the steel to site as sheet steel, which requires fewer heavy goods vehicles; and

Summary Position of Interested Party	Applicant's Responses
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North Muskham Parish Council [RR-162]	
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- | | |
|--|--|
| | <ul style="list-style-type: none"> • Use on-site manufacturing of the sheet steel into the mounting structures, using on-site-generated solar power for the equipment for this. |
|--|--|

3.21 NORWELL PARISH COUNCIL

Table 3-20 Responses to Norwell Parish Council

Summary Position of Interested Party	Applicant's Responses
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Norwell Parish Council [RR-163]	
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Landscape and Visual

<p>The Parish Council note that further panel fields may need to be removed in the examination process. If this is to be the case, priority should be given to removing panel fields around the six most severely affected residences as identified in the RVAA.</p>	
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<p>The Parish Council feel that the impact that would be felt by these six properties cannot be justified.</p>	
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	<p>It is unclear why Norwell PC consider that further removals of solar arrays may be required during the examination process. As identified by the RVAA which is summarised at paragraphs 25 and 26 of ES Volume 4, Appendix 7.6: Residential Visual Amenity Assessment (RVAA) [EN010162/APP/6.4.7.6] [APP-213], effects at these six properties would not be of the highest magnitude and removal of solar arrays to further mitigate effects on view from these homes is not necessary.</p>
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General

Public Benefit	
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	<p>Section 4.4 (Design Evolution) of ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] sets out details for a number of changes that were made</p>
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Summary Position of Interested Party

Applicant's Responses

Norwell Parish Council [[RR-163](#)]

The Applicant acknowledges there will be a multitude of significant adverse effects yet there are a very limited number of actual enhancements suggested by the PEIR. The Parish Council agree with Planning Inspector assessment in the Butchers Lane, Aughton solar farm appeal (PINS ref. APP/P2365/W/15/3002667), the “the benefits of any scheme are largely national/international whilst impacts are purely local”.

To justify the adverse impacts, the Applicant describes the benefits – the Applicant comprehensively explains the requirements to move towards net zero and the Group recognises this need. The development's contribution to this aim is to provide 800MW (AC) from renewable solar energy.

Perhaps understandably, the marketing claim that the development could produce enough power for all dwellings in Nottinghamshire is no longer cited. Having reviewed the figures in Technical Appendix A15, the Parish Council do not believe that this proposal will generate enough

to the layout of the Development in response to the feedback from the EIA scoping, non-statutory consultation, statutory consultation and ongoing engagement with the local residents. The design of the Development has been carefully considered throughout this period and the proposals include embedded mitigation and enhancement measures.

Whilst there has been a strong commitment to mitigating effects of the Development and effects have been reduced as far as reasonably possible, **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7]** [[APP-050](#)] finds however that the Development would have some residual significant adverse landscape and visual effects.

Planning Statement [EN010162/APP/5.4A] summarises that the Development will contribute towards the delivery of the national policy aims and commitments, providing a significant amount of low carbon electricity over its lifetime to the UK's legally binding net zero commitment. It is considered 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.

The Development's grid connection capacity is 800 MW. The Development is expected to power the equivalent of approximately 400,000 homes, based on average household electricity consumption figures from OFGEM of 2,700 kWh per annum⁵. The approach to calculating household consumption is consistent with industry standards.

ES Volume 4, Appendix A15.1 – Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1] [[APP-285](#)] has been prepared with best practice guidance contained within IEMA (2022). Institute of Environmental Management and Assessment

⁵ <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/average-gas-and-electricity-use-explained>

Summary Position of Interested Party

Applicant’s Responses

Norwell Parish Council [[RR-163](#)]

renewable electricity to power 400,000 homes. It is our understanding that the amount of generation has been grossly over-estimated and we would expect that their claims are subject to appropriate and very rigorous scrutiny. The Parish Council has noticed a large number of errors in the Technical Appendix and would strongly suggest that the claims in the Production and Transportation Emissions be thoroughly scrutinised. Overall, the Parish Council believe that the Public Benefit of this scheme has been significantly exaggerated.

(IEMA) Guide: Assessing Greenhouse Gas Emissions and Evaluating Their Significance. [Online]. Therefore, it is considered that the Applicant’s approach to the assessment of the climate effects of the Proposed Development is robust and in accordance with the IEMA Guide.

Land Use

The Council note the comprehensive ALC reports submitted with the ES.

The Applicant helpfully paraphrases paragraph 5.11.12 of the Overarching National Policy Statement for Energy (EN-1) (2023) stating “it advises that the use of BMV land should be minimised, with a preference for use of poorer quality land”. Additionally, the National Policy Statement for Renewable Energy Infrastructure NPS EN-3 (2023) is referenced stating “where the use of agricultural land has been shown

NPS EN-1 and NPS EN-3 include a preference for development of non-agricultural land over agricultural land, and when unavoidable, for development of agricultural land to be directed towards land of the lowest available quality. NPS EN-3 (paragraph 2.10.29) states that land type should not be a predominating factor in determining the suitability of the site location. Accordingly, the Applicant has taken account of ALC grading and agricultural land productivity throughout the design process for the Development and has sought to minimise the amount of BMV land included in the Order Limits. **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]** explains that one of the main factors considered in the site selection process for the Order Limits was the ALC grade of land and BMV with the clear objective of avoiding / minimising the use of Grade 1 and Grade 2 land. At worst case, the Development would result in the permanent loss of 4.5 ha of BMV arising from the retention of development in Work no. 4 (Intermediate substations), Work no. 5b

Summary Position of Interested Party

Applicant's Responses

Norwell Parish Council [[RR-163](#)]

to be necessary, poorer quality land should be preferred to higher quality land, avoiding BMV agricultural land where possible”.

The Natural England and MAFF ALC data serve two purposes. The first is to inform developers where the likely BMV land is in order to avoid it where possible. The second is to compare the impartial data to the results of the Applicant's soil surveys to confirm that there are no glaring discrepancies.

Although a significant amount of BMV land has been removed from the scheme (albeit for flooding, not BMV reasons) there still remains a significant portion of Grade 2 land to be put under solar panels.

Having read the applicant's site selection arguments made in the knowledge that the data always predicted that this land would be Grade 2, the Parish Council are of the view that there were insufficient attempts made to identify lower grade land as an alternative.

(400 kV compound) and Work no. 7 (Consented Staythorpe BESS and Connection). These elements of the development could be retained if they are required for the ongoing functioning of any substations that are to be retained, albeit that this would not ultimately be known until nearer the time of decommissioning.

As concluded in the **Planning Statement [EN010162/APP/5.4A]**, the inclusion of some BMV land within the Development is justified and the impacts on BMV land have been minimised by the nature of the Development and its design. Therefore, the Development is policy compliant.

Summary Position of Interested Party

Applicant's Responses

Norwell Parish Council [[RR-163](#)]

Ecology and Biodiversity

It is clear that a significant amount of work has been completed to reach an ecological baseline against which the impacts of the development can be assessed.

It is clear from the picture so far that the scale of proposed habitat loss, especially for red listed ground nesting birds, is significant. Red listed birds such as skylarks, avoid field boundaries, areas of regular human interference and tall structures, be they natural such as trees, or man-made such as utility pylons. (Milsom et al, 2001 Coastal grazing marches as a breeding habitat for skylarks *Alauda arvensis*).

Development proposals smaller than this one invariably describe the individual fields to be lost by occupation and acreage. This assists the scrutiny of any proposed mitigation/compensation proposals and is regarded as good practice.

In the Parish Council's Stage 2 Consultation Submission, the Parish Council asked that the field numbers and the acreage for all panel fields which would cause a habitat

ES Volume 4, Appendix 8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4] [[APP-217](#)] describes the methods and results of breeding bird surveys and desk study. Figure A8.4.1 of Appendix 8.4 shows field boundaries in relation to breeding territories. Section 8.8.15 of **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [[APP-051](#)]** assesses the potential effects of the Development on the breeding bird assemblage, including ground-nesting birds, and quantifies relevant aspects of both habitat areas and breeding territories.

Summary Position of Interested Party

Applicant’s Responses

Norwell Parish Council [[RR-163](#)]

loss for protected birds be provided so that the scale of habitat loss can be quantified. This still does not appear to have been provided.

Without this information, it is impossible to quantify how much compensation acreage is planned and, therefore, the extent of net habitat loss.

Principle of Development

There is the clear potential for this BESS to cause harm to the local area. Notwithstanding the associated CO2 emissions associated with the construction and global transportation of the industrial plan, there will be harm associated with the Landscape and Visual Impact, the further loss of agricultural land and most worryingly, the potential for serious ecological harm and risk to public health.

The Applicant justifies the need for this part of the GNR project principally along two lines: firstly, that it will contribute to overall net zero targets by assisting in the reduction

For background and context, the figures for the current installed capacity of BESS relied upon by the Interested Parties are not up to date. In November 2024, the National Energy System Operator (NESO) published its advice on achieving clean power by 2030 to the Department of Energy Security and Net Zero (DESNZ), which identifies a “potential significant undersupply of solar in the current queue compared to the CP30 pathways in 2030”. The NESO’s detailed advice was then supported and adopted by DESNZ in December 2024 in the Clean Power 2030 Action Plan⁶. Table 1 of the Action Plan identifies that the current installed capacity of solar is 16.6GW and DESNZ ‘Clean Power Capacity Range’ for 2030 is 45-47GW. Similarly for batteries the current installed capacity is 4.5GW and the DESNZ ‘Clean Power Capacity Range’ for 2030 is 23- 27GW. This means that there is a demonstrable unmet need for solar and BESS, and the large-scale projects that have accepted a grid connection offer such as the Development would contribute to the 2030 capacity requirements. As such, there is a clear need for BESS in this context. Further

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Summary Position of Interested Party

Applicant's Responses

Norwell Parish Council [[RR-163](#)]

of use of fossil fuels and secondly, that the BESS is required to cope with potential excess generation by the arrays.

The Parish Council's understanding from government figures is that, at the time of writing, there are already 52GWH of BESS projects that have been approved or are under construction. The government's 2035 BESS target is 28.7GWH.

There are already two approved BESS developments in the immediate locality, including one that is designed to link up to this project.

The Parish Council have reviewed the GHG Avoided Emissions which the applicant claims to be attributable to the BESS. The Parish Council believes that the applicant's methodology seems questionable and therefore could be responsible for a gross overestimation of emissions savings.

The Parish Council's view is that if the BESS installations were removed from the project, this would decrease the net emissions of the scheme. Should the developer suggest that removing a second BESS would make the scheme unviable, the

details of the need for the Development are provided in the **Statement of Need** [[EN010162/APP/7.2](#)] [[APP-324](#)].

ES Volume 2, Chapter 15: Climate Change [[EN010162/APP/6.2.15](#)] [[APP-058](#)] presents the worst-case scenario for carbon emissions. Further detail is provided within **ES Volume 4, Appendix A15.1: Lifecycle Greenhouse Gas Evaluation** [[EN010162/APP/6.4.15.1](#)] [[APP-285](#)]. It has been assumed within **ES Volume 2, Chapter 15: Climate Change** [[EN010162/APP/6.2.15](#)] [[APP-058](#)] that the Development components, e.g. solar PV framework will be produced in China using blast furnaces and delivered via sea from China, to ensure a worst case scenario is presented. As such, it is considered that the methodology of the ES chapter is appropriate, thereby the carbon saving is reasonable.

Summary Position of Interested Party

Applicant’s Responses

Norwell Parish Council [[RR-163](#)]

Parish Council believes that this assertion needs to be rigorously challenged. Minimum return on investment is not a Development Consent material consideration. The Parish Council would suggest that if a company cannot make a profit from an 800MW solar farm with a 340MW BESS, then it is probably in the wrong business.

For the above reasons, the Council strongly feels that the BESS should be removed from the development plans. If it is not, the Parish Council believes that the potential harm the BESS would cause should be material consideration for a refusal.

Landscape and Visual – Glint and Glare

PINS stated at 3.9.2 of their Scoping Opinion that:
 “... the ES should assess other receptors such as users of vessels on waterway within the ZTV, agricultural workers including when using farm machinery, ecological receptors and recreational users(eg walkers, cyclists and horseriders””
 The Applicant’s GGA has taken on board horse riders, agricultural workers, waterway

The receptor types specified by PINS have been considered, as set out in Section 4.1 of **ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]**. Based upon the wording of Norwell Parish Council’s response, it appears that the receptor types they believe to have been ‘ignored’ relate to ecological receptors and Public Rights of Way (PRoWs).
 Section 4.1.4.4 of **ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]** discusses ecological receptors, noting that whilst best practice Glint and Glare guidance focuses on human receptors, additional consideration of the impacts upon ecological receptors has been provided in **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8]**. This concludes that there is no

Summary Position of Interested Party

Applicant's Responses

Norwell Parish Council [[RR-163](#)]

users and receptors at different heights above ground level. However, it has so far decided to ignore PINS on the other receptors.

The Applicant's reasoning is that they judge the "effects for lower height receptors such as car drivers, cyclists and pedestrians are likely to be less than those for more elevated receptors and therefore do not require individual assessment" (page 5 GGA).

The Applicant cites the PINS 2024 publication – the Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development – as if their scoping approach is supported by the document. In fact, that document names one of the sensitive receptors as public rights of way.

The Parish Council refutes the Applicant's claim that the lower level receptors do not require Glint and Glare assessment simply because they are likely to experience glint alone.

potential for significant ecological effects from glint and glare to any Important Ecological Features, including designated sites and their qualifying or notified features.

Section 4.1.4.5 of **ES Volume 4, Appendix 16.1 Glint and Glare Assessment**

[EN010162/APP/6.4.16.1] [[APP-286](#)] discusses PRowS. In line with previously accepted glint and glare assessments for consented solar DCO applications, it was found that with the exception of roads (which have been assessed separately), there is no reasonable prospect of a significant effect in terms of the EIA regulations, and any effects of PRowS can therefore be concluded as acceptable without the requirement for detailed modelling.

Summary Position of Interested Party

Applicant's Responses

Norwell Parish Council [[RR-163](#)]

Land Use

Sheep

The Parish Council know this area and its agricultural land use very well: several councillors are from farming backgrounds and either farm or have farmed within the Parish itself.

The Parish Council is highly suspicious of the promise that the panel fields will be grazed by up to 10,000 sheep. In 2024, a survey was conducted of solar farms in this area, all of whom promised panelled fields of grazing sheep. On the survey day, not one sheep was in evidence.

It is highly unlikely that there are enough sheep locally to populate all the current and planned solar plants and, with sheep numbers dropping every year, this gap will become even more pronounced.

The Parish Council believes that firm and reliable evidence should be produced that there is a major planned and achievable increase in the local flocks during the

Sheep grazing alongside solar panels is common practice. It is therefore reasonable to assume that the agricultural land within the Order Limits could continue in agricultural use throughout the operational period though grazing livestock. The panels are raised off the ground and visibility under the panels for livestock, and the panel areas will all be fenced, and accordingly the sheep will be safely enclosed.

The Defra statistics "Agricultural Land Use in England at 1 June 2025 (Defra, 25 September 2025)⁷ suggests that panel areas on agricultural land can be used for grazing livestock. The figure shows that 4,937 ha of solar panels also grazed, and 4,563 ha of solar panels not used for agricultural production. Many of the early panels were too low for grazing, which may affect the statistics, but 52% of panel areas on farms were grazed on 1 June 2025.

⁷ <https://www.gov.uk/government/statistics/agricultural-land-use-in-england/agricultural-land-use-in-england-at-1-june-2025>

Summary Position of Interested Party

Applicant’s Responses

Norwell Parish Council [[RR-163](#)]

operational phase. Alternatively, the Applicant should be required to demonstrate that, whereas nationally the trend in sheep numbers is down, there has been a substantial year on year increase in sheep numbers in the Newark and Sherwood area, meaning that they have outgrown available grazing land (including the other 12 solar plants who also promised sheep). Without such evidence, the credibility of the promise of 10 FTE jobs and the use of sheep as a land management mechanism is severely weakened.

General and Principle of Development

Besides the adverse impacts on the Averham/Staythorpe area, already destined to have 2 BESS sites, the design of this project has serious sequential cumulative impacts in the Newark & Sherwood area. The applicant’s assessment will need amending as a formal application is expected soon for yet another solar farm at Barnby-in-the-Willows. There are already 12 operational utility scale solar farms in the District.

The Applicant has adopted a staged approach to the identification of cumulative developments, which is based on the PINS Advice on Cumulative Effects Assessment. **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2** [[EN010162/APP/6.4.2.1A](#)] provides a full list of cumulative developments considered at Stage 1 and 2 of the assessment, which then identifies a list of developments to be considered as part of the Stage 3 and 4 cumulative effects assessment. The shortlist is presented on a topic-by-topic basis in the technical chapters of the Environmental Statement (Chapters 7 to 18).

Section 2.3.8 of the **ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA)** [[EN010162/APP/6.2.2](#)] [[APP-045](#)] describes the staged approach to the identification of cumulative development adopted by the Applicant. In accordance with the PINS Advice on

Summary Position of Interested Party

Applicant's Responses

Norwell Parish Council [[RR-163](#)]

One way to reduce the impact would be to downsize this project in acreage. At paragraph 33 of Chapter 4 Site Selection and Design, the Applicant considers the alternative of a 'smaller solar park. It concludes that 'a substantially smaller solar park would not be financially viable with this grid connection'. However, SSE Renewables are doing precisely just that with a consented BESS called to the same substation and 100MWp of solar generation at Muskham Wood and Knapthorpe. Clearly, SSE have ways of making it financially viable when the Applicant apparently cannot. This seems highly unlikely. The cumulative impact, not just in Newark & Sherwood, but in North Nottinghamshire and Lincolnshire is a significant ground for objection.

Cumulative Effects Assessment, the developments to be considered in the cumulative assessment include existing and/or approved projects that are 'reasonably foreseeable'..

To the best of our knowledge (planning search 11/11/25) there has been no valid planning application for a solar farm at Barnby in the Willows to date and hence this proposal has not been included in the cumulative assessment. [Barnby is between 5 and 10 km from the OL, southeast of Newark and southeast of the River Trent.]

In relation to the scale of Development, Section 6.3 of the **Planning Statement [EN010162/APP/5.4A]** demonstrates that the approach to site capacity of the Development is in accordance with NPS EN-3 and national policy more widely. Paragraph 6.3.28 of the **Planning Statement [EN010162/APP/5.4A]** states that "*the Order Limits comprise an area of approximately 1,765 ha (i.e. 4,360 acres). Based on an installed DC capacity of approximately 1,120 MW, this equates to approximately 3.9 acres for each MW of output.*" The size of the Development is therefore in line with paragraph 2.10.17 of NPS EN-3 which states that, along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output.

3.22 NOTTINGHAMSHIRE AREA RAMBLERS

Table 3-21 Responses to Nottinghamshire Area Ramblers

Summary Position of Interested Party	Applicant's Responses
Nottinghamshire Area Ramblers [RR-165]	<p><i>Public Rights of Way</i></p> <p>The guidance on retaining or improving paths and public access is provided below: It is also important to recognise that many Rights of Way are part of our history, and have often been in existence for a hundred years or more. However, sometimes green energy developers propose moving paths because this suits the design of their installation plans. In general, as with all development, rights of way should be retained unless there is a very good reason for them to be diverted or the diversion proposed is more pleasant and convenient for walkers.</p> <p>If the development is on land with other access rights (such as open access) these should be retained or, if that is impossible, suitable land nearby should be offered in compensation so that there is no 'net loss' of public access rights.</p> <p>The proposed changes to the PRowWs are outlined in Section 18.6.1 of ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A] with supporting information provided in the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4] [APP-020] and ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1] [APP-200]. Out of the 117 identified PRowWs, eight will be fully or partially closed, with diversion in place to maintain the continuity of connection to the wider PRow network. Seven of these, that currently pass through Work no. 1 Solar PV area, will be diverted during all phases. One route (NT Sutton on Trent BW14) will be diverted only during the construction and decommissioning phase. No path would be closed without an alternative or replacement being opened first.</p> <p>Proposals for closures and re-routing of PRowWs have been avoided where practicable. As set out on Environmental Statement Volume 3, Chapter 18 Recreation Figures [EN010162/APP/3.18A] [AS-048] 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. PRowWs that follow tracks and hedgerows have been retained in their current positions, with the exception of NT Sutton on Trent BW14 which requires temporary diversion only during the construction and decommissioning phases.</p> <p>New permissive routes have been proposed to increase the connectivity of the network during the operational phase, including 21 new permissive footpaths, and six new permissive bridleways, creating 32.6 km of new permissive route. A circular recreational</p>

Summary Position of Interested Party

Applicant's Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

If there are traditions of public access on the land, these should be retained wherever possible.

In general, we expect:

- No rights of way to be extinguished, although temporary diversions for the period of that the equipment is in place may be discussed
- Rights of way and other paths or access to be kept in their current location unless there are benefits to users of the right of way by adjusting the alignment.
- Where permissive paths are proposed, these are to be retained for the length of the development and will be complementary to, but not replace, existing rights of way
- New Rights of Way to be added to make better connections in the local path network.
- Existing paths to be made wider than the current requirements of 1m for footpaths and 2m for bridleways on cross field paths (1.5m and 3m respectively for field edge paths); this allows for the growth of hedges and for the maintenance of the path surface.

route would be created around the Order Limits, covering 50.6 km, including 12.5 km of new permissive path.

ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A] provides measures to manage closures, diversions, and new permissive routes. The management plan has sought to ensure continued recreational use of the PRowS during construction, operation and decommissioning of the Development. It is not expected that the minimum widths of PRowS will be impacted. 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 existing hedgerows will be maintained throughout the life of the Development, with new trees incorporated throughout where appropriate, screening views of panels from the route. Any new surfacing would be set out within the final RRMP, in accordance with the outline RRMP, and submitted for approval to Newark and Sherwood District Council in consultation with NCC, prior to implementation.

ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6A] sets out that the Applicant will undertake a review of PRowS within the Order Limits prior to decommissioning, and in the final DRP will set out any proposals for changing PRowS at that time. This could include reverting the routes of diverted PRowS back to their current routes. The final DRP will be submitted to NSDC for approval prior to commencement of decommissioning.

Summary Position of Interested Party

Applicant’s Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

- Access Improvements through permissive paths, and upgrades to path surfaces & drainage, and infrastructure, such as gates replacing stiles, signposts, way-markers and information boards.
- The developer must guarantee that any diverted paths are restored to their original alignment when the development is decommissioned. This must also be in the attached Conditions if the Planning Authority approves the plans.
- Where there is a DMMO within the development, this must be treated as an existing right of way; the DMMO may be to upgrade a footpath to a bridleway.

Following analysis of the draft DCO and supporting documents the following is the submission on specific aspects of the proposal:

Impact on Definitive Map Modification Orders (DMMO)

Under the Wildlife and Countryside Act 1981 a significant number of DMMO applications

There are seven DMMOs within the Recreational Study Area, all of which are within or partially within the Order Limits. Each route is currently awaiting determination by Nottinghamshire County Council⁸ and is therefore not a legally recorded right of way. As a result, the DMMOs and their relationship with the Development are described in Section 18.5.5 of **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]** but are not assessed further.

Two of the DMMOs are not impacted by the Development (DMMO 1247, DMMO 1255). A further two DMMOs follow the route of existing PRow when impacted by the Development,

⁸ Nottinghamshire County Council (2025). Modification Order Application Register. [Online]. Available at: <https://www.nottinghamshire.gov.uk/planning-and-environment/walking-cycling-and-rights-of-way/rights-of-way/definitive-map-statement/modification-order-application-register>. (Accessed 12/06/2025).

Summary Position of Interested Party

Applicant's Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

have been submitted on behalf of Nottinghamshire Area Ramblers to the Highways Authority at Nottinghamshire County Council. These are routes which, although not currently recorded as public rights of way, should be added to the Definitive Map as a public rights of way, usually based on historic evidence. Four DMMO's are impacted by this DCO (reference numbers are as per Nottinghamshire County Council register).

DMMO 1230: Norwell Woodhouse to Ossington Road

Approx 1,000 metres of the line of this DMMO in Laxton & Moorhouse from SK735635 to SK732644 crosses fields with proposed panel block DB029.

The DMMO must be acknowledged and the plans adjusted accordingly

DMMO 1249: Maplebeck to Eakring BW

The line of this DMMO in Maplebeck parish from SK693611 to SK708609 will be across fields with proposed panel block DB013. In Eakring parish, the line of the DMMO will follow existing Eakring FP16 for 800 metres from SK687619 to SK679618 on a track

and so have been assessed within the chapter (DMMO 1203, DMMO 1244). One crosses a construction area and so will be affected by construction for a short distance but construction works would be managed so as to keep the route open to users (DMMO 1213). The final two DMMOs have new permissive paths proposed, or a combination of existing routes and new permissive paths proposed, in close proximity to the original route, and so access will still be available through the Development (DMMO 1230, DMMO 1249).

Summary Position of Interested Party

Applicant's Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

separated from panel block DB015 by an existing hedge.

The DMMO must be acknowledged and the plans adjusted accordingly

DMMO 1203: Kersall to Caunton BW

This DMMO proposes upgrading existing Kersall FP6 to BW.

Proposed BW adjacent to panel block DBN019 for approx 200 metres from SK716619 to SK717618 on stone track separated from panels by existing hedge.

The Developer must acknowledge the existence of this DMMO, and plan for adjustment to infrastructure.

DMMO 1255: Winkburn BW9 to Hockerton BW8

This DMMO extends existing Winkburn BW9 for nearly 2km to Hockerton BW8. Approx 100 metres from SK 694607 to SK693607 of the DMMO will be adjacent to panel block DB013.

The DMMO must be acknowledged and the plans adjusted accordingly.

Summary Position of Interested Party

Applicant's Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

Right of Way Closures and Diversions

Carlton-on-Trent FP6 and FP10 (page 55 of DCO)

This is proposed as permanent diversion. However, the DCO is only for a period of 40 years maximum. It should be a condition of the decommissioning that these closures and diversions are restored to their original alignments.

Weston FP10 (page 55 of DCO)

The closure of approximately 425 metres of Weston FP10 increases the walking distance between the closure points by approximately 640 metres (i.e. an increase of 150%). This will be particularly annoying to those walkers seeking to cross the A1 using Weston FP16. We would suggest that the diversion should link to Weston FP16, rather than return to the closure point W0FP10-b. Again this closure and diversion should be restored its original alignment as part of the decommissioning.

Eakring FP14

The closure of approximately 541 metres of Eakring FP14 increases the distance

The proposed changes to the PRowWs are outlined in Section 18.6.1 of **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**, with supporting information provided in the **Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4] [APP-020]** and **ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1] [APP-200]**. Out of the 117 identified PRowWs, eight will be fully or partially closed, with diversions in place to maintain the continuity of connection to the wider PRow network. Seven of these, that currently pass through Work no. 1 Solar PV area, will be diverted during all phases. One route (NT|Sutton on Trent|BW14) will be diverted only during the construction and decommissioning phase. No path would be closed without an alternative or replacement being opened first.

ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A] provides measures to manage closures, diversions, and new permissive routes. The management plan has sought to ensure continued recreational use of the PRowWs during construction, operation and decommissioning of the Development. **ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6A]** sets out that the Applicant will undertake a review of PRow within the Order Limits prior to decommissioning, and in the final DRP will set out any proposals for changing PRow at that time. This could include reverting the routes of diverted PRow back to their current routes. The final DRP will be submitted to NSDC for approval prior to commencement of decommissioning.

Proposals for closures and re-routing have been avoided where practicable. As set out on **Environmental Statement Volume 3, Chapter 18 Recreation Figures [EN010162/APP/3.18A] [AS-048]** 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. PRowWs that follow tracks and hedgerows have been retained in

Summary Position of Interested Party

Applicant's Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

between the closure points to approximately 805 metres. Again this closure and diversion should be restored its original alignment as part of the decommissioning

Kelham FP7A

This section of FP forms part of an historical and logical route from Caunton to Averham and Upton. The proposed diversion will be approx 750 metres long, i.e four times longer than existing FP.

This is unacceptable. There are several alternatives.

- 1) Remove this field from the scheme. This would have little impact on the generation capacity of this proposal.
- 2) Restrict the solar panels to the land to the west of FP7A. The FP can be screened from the panels, and the remainder of the field used for biodiverse planting.
- 3) Divert the footpath to the eastern field boundary. This would result in a footpath that is approximately twice the length of the current route.

their current positions, with the exception of NT|Sutton on Trent|BW14 which requires temporary diversion only during the construction and decommissioning phases.

425 m of NT|Weston|FP10 will be closed, and replaced with 810 m of diverted footpath. This increases the walking distance between the closure points by approximately 385 m (i.e. an increase of 91%).

541 m of NT|Eakring|FP14 will be closed, and replaced with 405 m of diverted footpath. However, in order to reach the original end point of NT|Eakring|FP14, users will have to travel on NT|Eakring|FP16 for 381 m, taking to total length to 786 m. This increases the walking distance between the closure points by approximately 245 m (i.e. an increase of 45%).

189 m of NT|Kelham|FP7A will be closed, and replaced with 464 m of diverted footpath. However for users travelling east, in order to reach the original end point of NT|Kelham|FP7A, users will have to travel on NT|Kelham|BW3 for 320 m, taking to total length to 784 m. This increases the walking distance between the closure points by approximately 595 m (i.e. an increase of 314%).

Summary Position of Interested Party

Applicant’s Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

General – Cumulative Impact

There appears to have been no assessment of the cumulative effect from the presence of a number of other solar farms that are in various stages of planning and implementation.

The following table is an extract from the government green energy database, listing all the solar farms planned / operational within the area of the Great North Solar Farm.

These schemes, if all of them become operational, will have a capacity of over 450MW, and cover around 1,970 acres pf the countryside. In other words, combined they are equivalent to more than 50% of the Great North Solar scheme. Of particular concern are several sites in the area around Caunton, which, combined with Great North Solar will leave significant tracts of land covered in solar panels.

It is imperative that these sites are taken into consideration when considering the landscape effects of the Great North Road Solar and Biodiversity Park.

A full list of cumulative developments to be considered at Stage 1 and 2 of the assessment is presented in **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]**. This includes other solar developments that are at the various stages of planning and implementation. In accordance with PINS Advice on Cumulative Effects Assessment, some of the developments that have been assigned a lower level of certainty have not been considered further at Stages 3 and 4 of the assessment.

Cumulative effects with existing and consented developments, as well as other proposals in planning or at earlier stages are considered in the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** . Section 7.10.7 of the ES recognises that landscape and visual cumulative effects will predominantly arise from the SSE BESS to the west of Averham, and One Earth, Kelham and Foxholes solar farms. **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** concludes that some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are considered in Section 7.9 with no new significant effects being identified.

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 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,

Summary Position of Interested Party

Applicant’s Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

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.

Traffic and Access

The guidance on construction and maintenance traffic is provided below:

Developers may propose that existing byways and bridleways are used for construction traffic to access the site, and for maintenance vehicles once the solar farm has been built.

During construction, a temporary Traffic Regulation Order (TRO) may be needed to close the path for safety reasons. Such closures should be kept to a minimum. Alternatively, it may be possible for access to be controlled by banksmen so the path can be kept open.

We expect:

- Arrangements for closing or controlling use of paths to be set out in the Construction Traffic Management Plan.
- A temporary diversion if a path has to be closed using a TRO or, if that is not

ES Volume 4, Appendix A14.2: Outline Travel Plan [EN010162/APP/6.4.14.2] [[APP-284](#)] has been developed to support **ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [[APP-203](#)]** to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised. Requirement 14 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]** requires that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC.

ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A] provides measures to manage closures, diversions, and new permissive routes. The management plan has sought to ensure continued recreational use of the PRoWs during construction, operation and decommissioning of the Development. Requirement 18 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a recreational routes management plan for that phase have been submitted to and approved by Newark and Sherwood District Council. This must be in accordance with **ES Volume 4, Appendix A18.1: oRRMP [EN010162/APP/6.4.18.1A]**.

Summary Position of Interested Party

Applicant’s Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

possible, alternative routes to be identified and advertised.

- Protective surfaces to be laid on any paths taking heavy traffic to protect the pre-existing surface.
- Reinstatement of any impacted path surfaces to a firm and safe condition within a set time after construction.

Flood Risk, Drainage and Water

The guidance on drainage is provided below:

The effect of the development on drainage should be considered as part of the planning process e.g. through a flood risk assessment, so that it doesn’t cause flooding on other land. This should include any effects on drainage from construction traffic. If there are path drainage problems at the site, such as paths becoming boggy in wet weather, we expect drainage improvements.

As outlined in Paragraph 207 of **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]** [[APP-052](#)] there are field drains across the Site which could be damaged when installing substations cable trenches. This will be apparent at the time, and during wetter conditions could lead to drainage into the excavated trenches and foundations. This would be pumped to other parts of the field. In fields that are proposed to continue in agricultural use during the Development’s operation phase, remedial field drain works would be installed along the cable trench wherever field drains are damaged, to maintain the current functionality of drainage system.

As outlined in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**, 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.

Summary Position of Interested Party

Applicant's Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

Noise and Vibration

The guidance on noise is provided below:
 Solar and battery developments will include equipment (e.g. inverters, sub-stations, back-up generators) that generate noise. Noise will spoil enjoyment of paths and other public access. We expect such equipment to be:

- Housed in acoustic insulation.
- Located as far as possible from paths and public access.
- Located behind other buildings or structures.

The methodology for the assessment of operational noise is presented in Section 12.7.4 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12]** [[APP-055](#)].
 Based upon the Indicative Design, operational noise has been found to be of a Low / Negligible magnitudes, based upon best practice assessment criteria as agreed with the Council through direct consultation.
 The DCO process allows flexibility in the location of equipment; any such changes required as part of the final design to be constructed will be assessed, and where necessary, mitigation implemented (potentially including but not limited to the measures suggested by the Nottingham Area Ramblers) to ensure noise remains below the noise limits. This is secured by a Requirement of the **Draft DCO [EN010162/APP/3.1B]** which requires an operational noise assessment to be submitted to the Council prior to each phase of the Development being commenced, based on the final layout and equipment selection for that phase.

Landscape and Visual

The guidance on visual impacts is provided below:
 Depending on the site, solar panels and battery containers may be visible from a long distance, particularly if they glint in the sun. We expect:

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 16.1 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.

Summary Position of Interested Party

Applicant's Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

- The development uses low-reflectance panels, which are less easily seen from a distance.
- The panels are positioned in a way that minimises how much they can be seen from paths and other places with public access.
- Battery containers should be painted in a matt colour that minimises their visual impact.
- Planting of trees, hedges or other plants to screen the development from nearby paths.

Effects on visual receptors have been considered in developing the design and mitigation planting is included as set out in section 7.6 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [EN010162/APP/6.2.7] [[APP-050](#)].

Concept Design Parameters and Principles [EN010162/APP/7.14A] has been prepared setting out the key design parameters that represent the worst-case scenario assessed in the Environmental Impact Assessment for the Development. This is then secured by Requirement 6 in Schedule 2 of the **Draft DCO** [EN010162/APP/3.1B], ensuring that these principles and parameters shape the detailed design of the Development.

Health, Safety and Security

The guidance on CCTV is provided below:
 If cameras are installed to protect the site, these must be inward-facing to prevent the surveillance of walkers.

The Development includes a range of fencing and security measures which are described in Section 5.4.3.5 of **ES Volume 2, Chapter 5: Development Description** [EN010162/APP/6.2.5] [[APP-048](#)].

The measures are secured by the **Concept Design Parameters and Principles** [EN010162/APP/7.14A]. These include the use of security fencing and CCTV. It confirms the CCTV will be pole mounted and/or on nearby structures, 2 – 3.5 m camera height. The **Concept Design Parameters and Principles** [EN010162/APP/7.14A] confirm that CCTV cameras will be directed towards the Order limits and its immediate environs, or away from residential properties.

Summary Position of Interested Party

Applicant’s Responses

Nottinghamshire Area Ramblers [[RR-165](#)]

Requirement 6 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** secures that the details of the Development must accord with the concept design parameters and principles. The Authorised Development must be carried out in accordance with the approved details. This is required so that the detailed design accords with the information submitted with the application for development consent.

Principle of Development

A Better Alternative

Whilst solar energy is a key component of our move towards a more sustainable future, we support the CPRE, whose research (by the UCL Energy Institute) has shown that there is the potential for up to 117GW of low carbon electricity from rooftops and other developed spaces (e.g. car parks). As a country we need to do more to encourage rooftop solar, rather than accept the current laissez-faire approach which allows investment companies, many using foreign capital, to exploit our countryside to the detriment of our important landscapes.

It should be no surprise that Nottinghamshire Area Ramblers OBJECTS to this application, which, if approved, will result in almost 3,400 acres of our

The delivery of a large amount of solar generation capacity such as the Development is an essential element required for delivery of the Government’s energy objectives and legally binding net zero commitments. The need for the Development has been set out in **Statement of Need [EN010162/APP/7.2]** [[APP-324](#)].

ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [[APP-047](#)] sets out the alternatives for technologies, locations and Project’s layout. There is no policy requirement to consider alternatives such as roof-mounted solar and other artificial surfaces. Section 6.3 of the **Planning Statement [EN010162/APP/5.4A]** sets out policy testing for the approach to alternative sites and site selection, concluding that the Development complies with the policy tests for good design.

Summary Position of Interested Party	Applicant's Responses
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Nottinghamshire Area Ramblers [RR-165]	
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<p>countryside in the area north of Newark being covered in solar panels, to the detriment of everyone who seeks the enjoyment and well-being provided by this area.</p>	
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3.23 NORWELL SOLAR FARM STEERING GROUP

Table 3-22 Responses to Norwell Solar Farm Steering Group

Summary Position of Interested Party	Applicant's Responses
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Norwell Solar Farm Steering Group [RR-164]	
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<i>Landscape and Visual</i>	
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RVAA	
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<p>Dealing with the highest sensitivity receptors first, the 6 properties listed in paragraph 25 of the Residential Visual Amenity Assessment have been deemed not to reach the RVA threshold. The Group would disagree with that conclusion and would urge that a site visit is completed to these properties.</p>	
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<p>As identified by the RVAA which is summarised at paragraphs 25 and 26 of ES Volume 4, Appendix 7.6: Residential Visual Amenity Assessment (RVAA) [EN010162/APP/6.4.7.6] [APP-213], effects at these six properties would not be of the highest magnitude. Site visits to these properties have been undertaken by the assessor in reaching this judgement, and it is assumed that the request is for the ExA include these properties as part of their site visits during the Examination.</p>	
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Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

General

The Group have analysed the initial proposed land take for panels and concluded that far too much land was initially earmarked for panels in order to generate 800MW AC. This conclusion has now been supported by the fact that since then, the panel acreage has reduced by a third and yet 800MW is still forecast. A more detailed report is currently being prepared which will show that the current planned panel acreage still exceeds what would be needed to efficiently generate 800MW. Failure to remove fields which seriously impact the 6 properties is a significant ground for objection.

The Applicant noted the issues of overplanting was raised by the Interested Party. Section 6.3, from paragraphs 6.3.24 to 6.3.32 of the **Planning Statement [EN010162/APP/5.4A]** set out the policy background of generating capacity of a solar farm. For background and information, the generating capacity of a solar generating station is in almost all cases higher than this and is typically sized at a ratio of 1.4-1.8x the grid connection capacity. This means that the Development's 800MW grid connection capacity translates to a maximum generating capacity of between 1,120MW and 1,440MW. The justification of overplanting for the Development is based on various factors, primarily is enabling the grid connection to be maximised across its lifetime. This would fully utilise the BESS capacity and the secured grid connection, thereby maximising the generation of renewable energy and the other benefits of the Development.

The approach to site capacity of the Development is therefore in accordance with NPS EN-3 and national policy more widely.

Land Use

The proposal will lead to the loss of 1,842 acres of BMV land. This has been confirmed by a thorough ALC study. However, a lot of this loss could have been predicted based on the MAFF and Natural England's data. Nevertheless, the Applicant ploughed on. Serious questions remain over the site selection procedure with little

The ALC map published by the Ministry of Agriculture, Fisheries and Food (MAFF) is the only mapping available that shows land quality expectations. This methodology was devised by the Ministry of Agriculture, Fisheries and Food (MAFF) in the 1970s, and the

Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

evidence being produced to justify the inclusion of land which was predicted to be Grade 2.

ALC maps have not been updated since then. They are therefore considered provisional, identifying the prevailing ALC distribution.

As stated at paragraph 54 of **ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17]** [[APP-060](#)], the map is not sufficiently accurate for assessing individual fields or development sites and should only be used as general guidance, as advised in Natural England's TIN049.

To provide accurate information, the Applicant has undertaken a detailed ALC survey within **ES Volume 4, Appendix A17.1: Agricultural Land Classification Survey [EN010162/APP/6.4.17.1]** [[APP-288](#)] [[APP-289](#)].

Table 17.5 of **ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17]** [[APP-060](#)] confirms that the Order Limits comprise 149 ha (8.5%) of Grade 2 land, 944 ha (53.5%) of Grade 3a land, 596 ha (33.8%) of Grade 3b land, 1 ha of Grade 4 land (0%) and 75 ha (4.2%) of non-agricultural and not surveyed land under the ALC. ES Chapter 17 is informed by **ES Volume 4, Appendix A17.1: Agricultural Land Classification [APP-288]** [[APP-289](#)] which reports the findings of detailed ALC surveys for the Order Limits.

ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [[APP-047](#)] confirms that the site selection process for the Development has carefully considered minimising BMV land included in the Order limits. The Applicant's site selection has avoided the use of BMV where possible, in accordance with the relevant policy tests in NPS EN-1 and NPS EN-3. The Site's

Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

suitability for solar development and the Development's compliance with all relevant national and local policy is set out in detail within the **Planning Statement [EN010162/APP/5.4A]** .

BESS

The Group object to the planned third BESS in the Averham/Staythorpe area. A more detailed report on this is being prepared. However, it is already clear that this BESS is not needed as part of the national infrastructure. The outline Fire Safety Management Plan details the volume of on-site firefighting water stocks, in line with firefighting for 2 hours. Few would disagree that a thermal runaway is unlikely to be extinguished and cooled to prevent reignition in just 2 hours. The containment for fire-water run off also seems to be based on the 2 hour event. In the event of a runaway, further water supplies will be required. The Applicant discusses how tankers will be employed to remove contaminated run-off. Given the time frames, these would have to be first responder tankers. On 19 February 2025 at the smaller Stratera BESS facility in Essex, 23 fire appliances were sent. Contaminated fire water remained on site more than 4 months after the incident while Stratera attempted to find a contractor to remove and treat it safely. The Group believe that this BESS should not be allowed as the Applicant has failed to demonstrate the capability to deploy a number of tankers in sufficient time to remove contaminated fire-water run-off.

As stated in **Statement of Need [EN010162/APP/7.2]** [[APP-324](#)], National Policy Statements (NPS) EN-1 and NPS EN-3 support the development of renewable energy developments, and the role that energy storage plays in achieving net zero and providing flexibility to the energy system. The Development also contributes to the ambitions to achieve Clean Power by 2030.

The principle of the Development and the policy framework for the Development, as per NPS EN-1 and the NPS EN-3, has been agreed with the Nottinghamshire County Council and the Newark and Sherwood District Council. This is set out within the **Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1]** and the **Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2]**.

Regarding the firefighting water volume, **ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A]** specifies the use of lithium iron phosphate cells in used in the BESS, which are generally considered safer as they are less prone to thermal runaway and explosions than other lithium-ion battery technologies. The site design incorporates various fire prevention and mitigation measures, including adequate separations and access (in

Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

accordance with NFPA 855), in conjunction with an advanced multi-layered fire safety control system prioritising early detection, suppression, ventilation, electrical protection and alarms. Additionally, provision is made for water supply, primarily for cooling surrounding areas of BESS that enter thermal runaway. By complying with relevant international and British standards and guidelines, such as NFPA 855, UL 9540, FM DS 5-33, Allianz Global Risk Consulting, EASE BESS Safety Best Practices Guideline, NFCC guidance and the Fire Safety Order, the design of the site has been created to allow for adequate emergency response, management and hazard containment, to in the first instance, prevent an emergency event, but also to reduce the likelihood of an event happening to as low as reasonably practicable.

Based on the aforementioned standards and guidelines, the FSMP places a priority on early detection and prevention of thermal runaway and explosion. Requirement 7 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1BA]** guarantees that before the start of construction of Work No.5A (BESS), the full and final FSMP will be developed in agreement with the Newark and Sherwood Council and in consultation and approval by the Nottinghamshire Fire and Rescue Service and the Environment Agency.

As stated in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]** the runoff from the Site shall, in principle, replicate the quality and quantity of the runoff from the Site in its "greenfield" state. In the rare event of a battery unit fire, the site is designed to capture firewater and through the

Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

use of a Hydro-Brake or similar flow restriction, prevent any uncontained releases to the hydrological environment. It will be the responsibility of the Development operator to maintain effective drainage measures and rectify drainage measures that are not functioning adequately. In addition to the above, regarding fire suppression, the Development operator will follow the accepted strategy of allowing a battery-related fire to self-consume. This is to reduce unnecessary risk of injury to the firefighting personnel. If a fire occurs, the affected enclosure will be allowed to self-consume until the fire is extinguished through consumption of the combustible materials within the battery enclosure.

The Development will feature equipment that is in compliance with UL 9540 (or IEC 62619) certification, and has been demonstrated to meet UL 9540A testing requirements to evidence that fire will not spread to adjacent containers, to attempt to reduce burn time. The firefighting procedure will involve spraying water to adjacent BESS enclosures to reduce the temperature of the adjacent containers. As water will not be directly applied to the affected BESS container, there is significantly reduced potential for suppression water to become contaminated, as the water spray is external to any contaminants.

Based on the above, Elements Green Trent Limited considers that the firefighting water provisions are adequate and consistent with best practices.

Summary Position of Interested Party

Applicant’s Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

Biodiversity

With regard to habitat loss for protected species, the Group asked at PEIR that the acre sizes should be provided for all fields that would experience a habitat loss for birds such as skylarks. Similarly, as this habitat loss cannot be mitigated, it was requested that details be provided of the fields to be employed as compensation. In this way, it would be possible to verify whether these fields were suitable for compensation, given restrictions on such fields by DEFRA, the RSPB and Natural England. One is told at paragraph 303 of Chapter 8 that 178 skylark territories will be lost. But the Group so far have not found any figures which would assist in determining whether there would be a net loss of avian habitat. The Applicant will know the field sizes as they will have been part of landowner negotiations. As it is not possible to quantify net habitat loss/gain, this is a significant reason for objection.

ES Volume 4, Appendix 8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4] [[APP-217](#)] describes the methods and results of breeding bird surveys and desk study. Figure A8.4.1 of Appendix 8.4 shows field boundaries in relation to breeding territories. Section 8.8.15 of **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8]** [[APP-051](#)] assesses the potential effects of the Development on the breeding bird assemblage, including ground-nesting birds such as skylark, and quantifies relevant aspects of both habitat areas and breeding territories.

Climate Change

Green Book Compliance /Energy Security.

It is accepted that that it is not mandatory for this private sector proposal to comply with all requirements contained in the UK Treasury Green Book. However, as this is an application seeking approval by the Secretary of State, there would be an expectation that Green Book principles would be adopted.

Failure to Undertake Risk-Compliant Appraisal: The Treasury Green Book requires that “all appraisals must identify, assess and where

“Value for Money not Demonstrated”: The HM Treasury’s Green Book (<https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>) is intended principally for publicly-funded policies, programmes and projects, and hence needs to demonstrate value for money. The Development is privately funded and this aspect is not applicable.

Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

possible quantify risk” (HM Treasury, Green Book 2022, §5.54–5.62). The applicant has not provided a systematic appraisal of cybersecurity risks associated with the proposed use of infrastructure manufactured in the Peoples Republic of China. This omission is inconsistent with Green Book standards on risk management. pValue for Money (VfM) Not Demonstrated: Under the Green Book, value for money requires the “optimal use of resources to deliver intended outcomes” and must include risk-adjusted costs (§4.1; §5.68). The proposal does not account for the whole-life costs of cybersecurity failures, including potential blackouts, supply disruption, or remediation following a compromise of BESS units. Without a risk-adjusted VfM assessment, the scheme cannot be said to comply with Treasury standards for economic appraisal. iDistributional Impacts Ignored: The Green Book requires decision-makers to consider the distribution of benefits and risks, including local and regional impacts (§5.74–5.81). In this case, the downside risks of cyber disruption, fire, or local power outages would fall disproportionately on the Newark and Sherwood District community, whereas the benefits (including equipment supply chain gains and profit repatriation) accrue primarily to overseas manufacturers and investors. The failure to account for these distributional effects breaches Green Book guidance on equity and fairness.

The relevant NPSs to the Development do not include specific policies relating to cyber security, as this is the responsibility of OFGEM. Energy suppliers are now required to comply with the Network and Information Systems (‘NIS’) EU Directive, transposed into UK law as The Network and Information Systems Regulations 2018⁹ (‘NIS Regulations’), which came into force on 10 May 2018. It can therefore be assumed that the Applicant will comply with their cyber security provisions under these regulations.

Detailed responses on this matter has been set out in the Statement of Common Ground with Norwell Solar Farm Steering Group.

⁹ Legislation.gov.uk (2018). The Network and Information Systems Regulations 2018. Available at <https://www.legislation.gov.uk/uksi/2018/506/made> (Accessed November 2025)

Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

Cumulative Impact

Besides the adverse impacts on the Averham/Staythorpe area, already destined to have 2 BESS sites, the design of this project has serious sequential cumulative impacts in the Newark and Sherwood area. The Applicant's assessment will need amending as a formal application is expected soon for yet another solar farm at Barnby in the Willows. By the Group's count, there are already 12 operational utility scale solar farms in the District. One way to reduce the impact would be to downsize this project in acreage. At paragraph 33 of Chapter 4 Site Selection and Design, the Applicant considers the alternative of a "smaller solar park". It concludes that "a substantially smaller solar park would not be financially viable with this grid connection." However SSE Renewables are doing precisely just that, with a consented BESS cabled to the same substation and 100MWp of solar generation at Muskham Wood and Knapthorpe. Clearly, SSE have ways of making it financially viable when the Applicant apparently cannot. This seems highly unlikely. The cumulative impact, not just in Newark and Sherwood, but in North Nottinghamshire and Lincolnshire is a significant ground for objection.

The Applicant has adopted a staged approach to the identification of cumulative developments, which is based on the PINS Advice on Cumulative Effects Assessment. **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]** provides a full list of cumulative developments considered at Stage 1 and 2 of the assessment, which then identifies a list of developments to be considered as part of the Stage 3 and 4 cumulative effects assessment. The shortlist is presented on a topic-by-topic basis in the technical chapters of the Environmental Statement (Chapters 7 to 18).

In accordance with the PINS Advice on Cumulative Effects Assessment, the developments to be considered in the cumulative assessment include existing and/or approved projects that are 'reasonably foreseeable'.

To the best of our knowledge (planning search 11/11/25) there has been no valid planning application for a solar farm at Barnby in the Willows to date and hence this proposal has not been included in the cumulative assessment. [Barnby is between 5 and 10 km from the OL, southeast of Newark and southeast of the River Trent.]

In relation to the scale of Development, Section 6.3 of the **Planning Statement [EN010162/APP/5.4A]** demonstrates that the approach to site capacity of the Development is in accordance with NPS EN-3 and national policy more widely. Paragraph 6.3.28 of the **Planning Statement [EN010162/APP/5.4A]** states that "*the Order*

Summary Position of Interested Party

Applicant's Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

Limits comprise an area of approximately 1,765 ha (i.e. 4,360 acres). Based on an installed DC capacity of approximately 1,120 MW, this equates to approximately 3.9 acres for each MW of output. The size of the Development is therefore in line with paragraph 2.10.17 of NPS EN-3 which states that, along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output.

Conclusion

Public Benefit.

A detailed report is currently being prepared covering this subject. However, at this stage, it is already apparent that the Applicant has again overstated the greenhouse gas emission savings that would be brought about if this project is allowed. Similarly, as happened at the PEIR stage, the Applicant has significantly under-reported the CO₂ emissions caused by its construction, operation and decommissioning. It is now clear that this project will be responsible for significantly more CO₂ emissions than it will save. It will actually add to global warming by a significant amount.

The possible impacts of the Development on the climate throughout its construction, operation, and decommissioning phases has been assessed and the assessment is provided in **ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15] [[APP-058](#)]**.

The Applicant expects (but cannot commit at this time, as explained in Section 15.5 of the Chapter) to achieve substantial further reductions in carbon footprint (relative to that assessed in this chapter) through procurement of the solar PV mounting structures, by:

- Sourcing steel for the solar PV mounting structures from UK-based suppliers, avoiding the carbon footprint from shipping steel internationally;
- Sourcing steel from manufacturers that use electrical arc-furnaces rather than fossil-fuel-fired furnaces;
- Transporting the steel to site as sheet steel, which requires fewer heavy goods vehicles; and,

Summary Position of Interested Party

Applicant’s Responses

Norwell Solar Farm Steering Group [[RR-164](#)]

- Use on-site manufacturing of the sheet steel into the mounting structures, using on-site-generated solar power for the equipment for this.

3.24 BUGLIFE- THE INVERTEBRATE CONSERVATION TRUST

Table 3-23 Responses to Buglife- The Invertebrate Conservation Trust

Summary Position of Interested Party

Applicant’s Responses

Buglife- The Invertebrate Conservation Trust [[RR-023](#)]

Ecology and Biodiversity

Buglife is concerned that inadequate mitigation measures are being implemented to safeguard populations of aquatic invertebrates. Wetland features including watercourses and wet ditches are present within the Order Limits and tributaries of the River Trent are located in close proximity. All these habitats will support a range of aquatic invertebrates.

Volume 2 of the Environmental Statement (ES), Chapter 8 ‘Ecology and Biodiversity’ (June 2025) states “Novel structures in the landscape may deter or attract certain

Sections 8.7.7 of **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]** includes consideration of invertebrates (section and the potential effects of polarised light on them. Whilst it is recognised that anthropogenic sources of polarised light affect the behaviour of invertebrates, there is limited evidence of adverse ecological effects from solar PV in the UK. While such effects are possible, it must also be recognised that the Development design includes measures to avoid and reduce potential effects on invertebrates (particularly the aquatic community), notably the 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.

The solar panels have an anti-reflective coating and are generally much less reflective than water, although polarised light will be reflected.

Summary Position of Interested Party

Applicant's Responses

Buglife- The Invertebrate Conservation Trust [[RR-023](#)]

animal species via a range of behavioural cues in response to, for example, polarised light and reflected light. Responses to solar PV modules have been speculated to occur in invertebrates, birds and bats but the evidence supporting these claims is inconclusive or otherwise not applicable to solar PV in the UK". It then concludes that "Potential adverse ecological effects are extremely unlikely and are scoped out of this assessment". iBuglife do not agree that the effects of polarised light should be scoped out and impacts left unmitigated. There is clear scientific evidence that shows that many aquatic invertebrate groups are attracted to polarised light because they detect water by means of the horizontal polarization of water-reflected light. Solar panels are strong reflectors of horizontally polarised light, attracting insects which often lay their eggs on the panels, resulting in a failed breeding attempt with obvious negative consequences for their populations. For a solar park of this scale and in proximity to many wetland habitats, there is the real potential for aquatic invertebrate populations to be adversely impacted. eThe mitigation measures

The Development also includes a large range and extent of favourable habitat management as set out in **ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]**.

Summary Position of Interested Party

Applicant’s Responses

Buglife- The Invertebrate Conservation Trust [\[RR-023\]](#)

needed involve a slight modification to panel design before installation of the addition of a white, non-polarising gridding to reduce their attractiveness to aquatic invertebrates with a very modest reduction in the solar-active area (Black TV, Robertson BA (2020)). Due to potential impacts on invertebrates, if this project was to go ahead, it is essential that a commitment is made to these mitigation measures as part of the permission.

Buglife welcomes that the applicant is committed to increasing the biodiversity across the scheme, through measures such as increasing habitat connectivity and extent and steps to improve water quality. There is a real opportunity for the species diverse grassland creation to be of benefit to pollinating insects through the creation of wildflower rich habitats. Buglife would recommend using green hay where possible as a seed source for grassland creation, obtained from a local wildflower- rich meadow or ensuring seed that is purchased is of native origin. There are many resources on habitat creation for pollinators on our website.

ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] describes the methods by which habitats will be enhanced, created and managed.

The proposed diverse grassland (sections 12 and 13 in Table A5.1.3 of the Outline LEMP) includes hay strewing as a method to support grassland management. The LEMP also specifies seed mixes that are of native provenance. Nutrient stripping is unlikely to be necessary for the creation of most ‘other neutral grassland’ because it is neither a particularly species-rich habitat nor reliant on very low-fertility soils. Glyphosate is proposed only in a limited range of situations and only to help provide a longer-term beneficial outcome.

Summary Position of Interested Party

Applicant's Responses

Buglife- The Invertebrate Conservation Trust [[RR-023](#)]

Buglife would highlight that due to the current use of the land as arable, nutrient stripping may be required for habitat creation to be successful. This is not identified as a measure in the Outline Landscape and Ecological Management Plan (oLEMP) and may need to be considered. The oLEMP does suggest the use of glyphosate as a means to control competitive perennials and this should be avoided due to the toxicity of this chemical to wildlife. Application of any herbicide should be very limited.

3.25 OSSINGTON RESIDENTS' GROUP

Table 3-24 Responses to Ossington Residents' Group

Summary Position of Interested Party	Applicant's Responses
Ossington Residents' Group [RR-168]	
<i>Landscape and Visual</i>	
<p>Ossington Residents' Group wishes to register and make the following comments on the most concerning aspects of the application submitted by Elements Green:</p> <p>Landscape and Heritage - such a massive solar development would inevitably alter the extremely rural local character of the area. It is not and never has been 'a post-industrial landscape' as claimed by the applicant. The former Ossington airfield, used by many for varied recreational purposes and positive mental health, would become largely covered by solar panels, losing access, wildlife, ambience, and its place in the landscape.</p>	<p>The description 'post-industrial landscape' is not used in the LVIA ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050], or any of its supporting appendices and has not informed the assessment provided.</p> <p>The Applicant's understanding is that any use of the former Ossington airfield for recreation, except along the road which passes through the airfield, is informal as there is no right of way or open access land. The Applicant has proposed a new permissive path through the Ossington Airfield – New Permissive Footpath 8. This is shown on the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4] [APP-020].</p>
<i>Land Use</i>	
<p>Agriculture - all land affected is classified 'Best and Most Versatile', with consequent loss of agricultural production for 40 years and significant financial effect on farming tenants. Any mitigating sheep grazing would</p>	<p>ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060] includes an assessment of the Development's potential effects to soil quality and the availability of BMV land.</p>

Summary Position of Interested Party

Applicant's Responses

Ossington Residents' Group [[RR-168](#)]

be inefficient with genuine husbandry concerns, because of the difficulties of observation, capture and medical intervention if required.

Although there would be temporary disturbance of soils and land quality in the areas in which the construction compounds are erected, only limited areas of land would continue to be affected for the operation of the Development, namely the agricultural land required for construction of the base areas for fixed equipment (such as substations), the internal access tracks and the BESS compound. This would result in a temporary disturbance of 19.4 ha of BMV land during operation of the Development.

Development in Work no. 4 (Intermediate substations), Work no. 5b (400 kV compound) and Work no. 7 (Consented Staythorpe BESS and Connection) may remain following the decommissioning phase which would, at worst case, result in the permanent loss of 4.5 ha of BMV. The rest of the BMV land would be capable of restoration to a comparable grade at the decommissioning phase.

Ecology and Biodiversity

Wildlife - because of historically less intensive estate management, Ossington parish is extremely biodiverse, including all species of deer and 10 species of bats. The nationally rare Barbastelle bat has been found in the north of the parish, in an area ideally suited to its needs because of landscape and ecology, that is planned to be covered with solar panels. The former airfield area provides habitat and food for Red List bird species such as Lapwing and Skylark, as well as Barn Owls, plus raptors such as Buzzard and Red Kite, and a large number of migratory birds in transit. Many of

A range of baseline studies has been undertaken to establish the status and distribution notable and protected species in the area around Ossington 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 barbastelle bat and important bird species, are assessed in **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]**. 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/6.4.5.1A] includes a range of beneficial interventions in and around Ossington including the creation of new woodland, wood pasture and open grassland.

Summary Position of Interested Party

Applicant's Responses

Ossington Residents' Group [[RR-168](#)]

these would disappear if solar panels were to be erected.

General

Cumulative Impact - apart from other concerns such as increased traffic, inappropriate road use, noise, safety, recreation and amenity loss, the most concerning impact is the cumulative effect on the area. The proposed development would be one of the very largest in the entire country, affecting 18 parishes over a very wide area due to its shape, with Ossington and Moorhouse to the north planned to have some of the most densely covered areas of the development. The designated 'Rural Byways' in the area would become defunct as walking, riding, pedalling or driving through an industrialised landscape would have no attraction. Living in the area would suffer the same fate. East Nottinghamshire and Lincolnshire, some of the most productive agricultural areas in the country, have been targeted for solar production by multiple developers. The overall cumulative effect of this dash for Net Zero, with solar panels covering many thousands of acres,

An assessment of cumulative effects of the Development with other developments has been undertaken as part of the EIA process as described in Section 2.3.8 of **ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA)** [[EN010162/APP/6.2.2](#)] [[APP-045](#)] and **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2** [[EN010162/APP/6.4.2.1A](#)]. The shortlisted projects have subsequently been assessed within the relevant chapters of the Environmental Statement.

Section 7.10.7 of the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)] recognises that landscape and visual cumulative effects will predominantly arise from the SSE BESS to the west of Averham, and One Earth, Kelham and Foxholes solar farms. **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)] concludes that some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are considered in Section 7.9 with no new significant effects being identified.

Whilst some significant adverse effects on landscape and visual have been identified, there would not be a conflict with NPS EN-1 and EN3. NPS EN-1 recognises that virtually all NSIPs will have 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 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

Summary Position of Interested Party	Applicant's Responses
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Ossington Residents' Group [RR-168]	
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<p>in a relatively small area must be taken into account, rather than considering each development in isolation, otherwise the green and very pleasant land of Nottinghamshire will become no more than an extended industrial estate.</p>	
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<p>For all the above reasons and more, the Ossington Residents' Group is against the Great North Road Solar Development.</p>	
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	<p>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.</p>
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	<p>Other potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "<i>When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.</i>" These effects will be secured by implementation of the Development as described, together with the control measures as set out.</p>
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3.26 PAUL MITCHELL AND PAMELA GLADWIN

Table 3-25 Responses to Paul Mitchell and Pamela Gladwin

Summary Position of Interested Party	Applicant's Responses
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Paul Mitchell and Pamela Gladwin [RR-169] [RR-174]	
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<i>Introduction</i>	
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<p>We live at [REDACTED] Kneesall, the property lies to the east of Kersall Road as shown on the map attached in the Party's submission. [...] location of our business, P M & G Chartered Accountants (P M & G Limited Registered in England No. 4525838). As such this is a location where we are based 24/7 and is a location visited</p>	
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	<p>The Interested Parties own land which is outside of the Order Land and no part of that land is proposed to be acquired.</p>
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	<p>The Interested Parties have the benefit of Category 2 rights in respect of services over land within the following land parcels:</p>
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	<p>Land shaded pink on the Land Plans [EN010162/APP/2.2B] over which full acquisition powers are sought:</p>
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Summary Position of Interested Party

Applicant’s Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

by clients. We would like the Examining Authority to view the proposal from our property both internally and externally during their site inspection.

Project Name

We are aware that the applicant (Elements Green Trent Ltd) has chosen to change the project name to Great North Road Solar and Biodiversity Park. We are concerned that this is purely a branding and marketing strategy and in no way changes the basic premise that the project is a Solar Farm. For ease in this representation, we refer to the proposal as GNR. In fact having watched a family of deer grazing in the field next to us this morning we have concerns regarding the negative impact it will have on the wildlife in the local area given the fencing of fields etc.

Project Timescale

We are aware that solar farms are generally described as temporary land uses, however, an operational lifetime of 40 years for this project (or 60 years in the case of other projects such as One Earth Solar) is at least a generational lifetime. We consider

- Plots 22/6, 22/9, 22/11, 22/29, 22/30 - required for Work No.2 (Cable)
- Plots 22/8, 22/12, 22/14, 22/25, 22/27 - required for Work No.3 (Mitigation)
- Plot 22/13 - required for Work No.1 (Solar PV)

Land shaded blue on the Land Plans **[EN010162/APP/2.2B]** over which new rights and/or restrictive covenants are sought:

- Plots 22/7, 22/10 - Cable Rights and Cable Restrictive Covenants for the purpose of Work No.2 (Cable)

The access road referred to in the Relevant Representation is unaffected by the Development – only the adopted highway verge opposite the Interested Party’s driveway (comprising Plots 21/26, 21/27, 21/28 and 21/29 - see the Land Plans **[EN010162/APP/2.2B]**) is included in the Order to enable Work No. 8 (Access), and no part of this land is proposed to be compulsorily acquired.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

describing the project as a temporary use of land as misleading.

The River Trent valley has been home to a succession of numerous power stations which have had an operational life that is not dissimilar to the proposed solar farm:

- Staythorpe A Power Station (Coal) was operational for 33 years from 1950 to 1983.
- Staythorpe B Power Station (Coal) was operational for 31 years from 1962 to 1994.
- Cottam Power Station (Coal) was operational for 51 years from 1968 to 2019 and
- West Burton A Power Station (Coal) was operational for 47 years from 1966 to 2013.

On average the coal fired power stations in this section of the River Trent valley were operational for 40.5 years. We consider that a solar farm and BESS should be deemed to be permanent development in the context of the average lifespan of power generation plants.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [RR-169] [RR-174]

Relevant Considerations

It is our understanding that National Policy Statements (NPS) provide the framework within which Examining Authorities make their recommendations to the Secretary of State. Those which are relevant to a Solar Energy NSIP are:

- Overarching NPS for energy (EN-1)
- NPS for renewable energy infrastructure (EN-3)
- (NPS for electricity networks infrastructure (EN-5) if it includes grid infrastructure)

We note that Section 104 of the Planning Act 2008 sets out what the Secretary of State must have regard to in making his or her decision where a relevant NPS is designated. This includes any matter that the Secretary of State thinks is important and relevant to the Secretary of State's decision. It also sets out that whether the

It is considered that the assumptions regarding the economic, environmental, social, and other benefits that the Development can provide are appropriate, and that it has been subject to consultation as set out in the relevant Environmental Statement chapters.

The Development's grid connection capacity is 800 MW. The Development is expected to power the equivalent of approximately 400,000 homes, based on average household electricity consumption figures from Ofgem of 2,700 kWh per annum¹⁰. The approach to calculating household consumption is consistent with industry standards.

Planning Statement [EN010162/APP/5.4A] considers and assesses the Development against relevant planning policy and other matters the Applicant considers are likely to be important and relevant to the SoS's decision. Section 7.4 concludes 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."

¹⁰ <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/average-gas-and-electricity-use-explained>

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

adverse impact of the proposed development would outweigh its benefits is a relevant consideration.

The issues we raise below are matters that are relevant to the consideration of the proposed development under NPS EN-1 and/or NPS EN-3.

We also note that the Written Ministerial Statement (Solar and protecting our Food Security and Best and Most Versatile (BMV) Land - 15 May 2024) also sets out the following matters as relevant planning considerations for Solar Energy proposals:

- Food Security
- Protecting the Best and Most Versatile Agricultural Land
- Cumulative Impacts

Energy Generation

We are concerned that the potential benefits of GNR are being overstated. The figures suggest that GNR Solar will have the potential to power double the number of homes as the One Earth Solar scheme, which is the closest NSIP; yet the

Summary Position of Interested Party	Applicant's Responses
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Paul Mitchell and Pamela Gladwin [RR-169] [RR-174]	
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generation is 800MW at GNR versus 740MW at One Earth.	
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<i>Principle of Development</i>	
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Scale of Development	
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<p>The scale of GNR is disproportionate to host communities. The Development is a circular form that the Applicant in the Preliminary Environmental Information Report (PEIR) identified extends across an area of 18,119.9ha. The latest iteration of the proposal includes 1,765ha within the Order Limits. The majority of the land within the Order Limits is currently used for arable crops or is otherwise down to pasture.</p>	
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<p>We understand that the GNR project includes land within or immediately abuts a total of 22 Parishes. Newark & Sherwood District has a total of 84 Parishes, so GNR impacts on more than a quarter of the Parishes in the entire District.</p>	
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<p>The circular nature of the GNR scheme encircles entire communities across the area of 18,119.8ha that the Development extends across. GNR is in the form of a doughnut. As such the impact of GNR</p>	
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	<p>Both NPS EN-1 and EN-3 clearly establish the need for the delivery of a large amount of solar generation capacity. It is an essential element required for delivery of the Government's energy objectives and legally binding net zero commitments. 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.</p>
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	<p>In relation to the scale of Development, Section 6.3 of the Planning Statement [EN010162/APP/5.4A] demonstrates that the approach to site capacity of the Development is in accordance with NPS EN-3 and national policy more widely. Paragraph 6.3.28 of the Planning Statement [EN010162/APP/5.4A] states that "<i>the Order Limits comprise an area of approximately 1,765 ha (i.e. 4,360 acres). Based on an installed DC capacity of approximately 1,120 MW, this equates to approximately 3.9 acres for each MW of output.</i>" The size of the Development is therefore in line with paragraph 2.10.17 of NPS EN-3 which states that, along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output.</p>
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Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

extends across a much greater area than a solar farm such which is more concentrated. This impact is particularly increased by other solar farms and BESS projects, existing and proposed that effectively fill in some of the gaps within the GNR circle.

We are concerned that the proposal will result in the industrialisation of a substantial proportion of Newark and Sherwood, which at present is an arable farming landscape.

Site Selection

The Design Approach Document (APP-319 5.6 Design Approach Document - Part 1 of 4 - Rev 1) indicates that design has been informed from the earliest stages by environmental considerations. It says that site selection and early design have taken account of community, technical and environmental factors including:

- Identifying land that is physically and technically suitable for the Development.
- Avoiding development within designated landscapes, heritage assets and ecology designations and maintaining separation from these.

ES Volume 2, Chapter 4: Alternatives [\[EN010162/APP/6.2.4\]](#) [\[APP-047\]](#) confirms that reasonable alternatives have been studied. The alternatives for design and locations have been adequately assessed, as presented in **ES Volume 2, Chapter 4: Alternatives** [\[EN010162/APP/6.2.4\]](#) [\[APP-047\]](#), The Site was also considered as part of the Sequential and Exception Test Report (Appendix C of **ES Volume 4, Appendix A9.1: Flood Risk Assessment** [\[EN010162/APP/6.4.9.1B\]](#))

Through a systematic and iterative site selection process, and with consideration of BMV land as one of the influencing factors in the site selection process, the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the **Planning Statement** [\[EN010162/APP/5.4A\]](#) concludes that the temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

- Maintaining separation from settlements and homes.
- Avoiding development within Green Belt, Local Plan allocations and minimising use of land identified as being of the best agricultural quality.
- Limiting development within areas identified as having a higher risk of flooding, and
- Working with willing landowners to avoid the need for compulsory purchase.

However, from what we can see these factors do not reflect the GNR proposal as being put forward; in particular in relation to separation from homes; avoiding land at risk of flooding and avoiding BNM agricultural land.

Site selection appears to have been heavily driven by landowners opting in, rather than being the most appropriate and suitable land chosen through a robust site selection methodology.

Landscape and Visual

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

The Environmental Statement and associated Landscape and Visual Impact Assessment take an incorrect starting point to the character of the area by describing existing infrastructure as having an urbanising influence. The A1 and ECML form a broadly similar alignment up the western side of the River Trent valley. The A1 lies to the east of the Order Limits and the ECML largely lies to the east of the Order Limits except for a stretch south of Cromwell. As such these two strategic transport routes do not impact on the majority of the 18,199.7ha of land over which the development is located.

Staythorpe Power Station is actually sited on a modest site, some 3.23% the size of GNR. It has been occupied by at least one power station since 1950 when Staythorpe A was commissioned following authorisation in 1946. Staythorpe A closed in 1983. Staythorpe B was commissioned in 1962 and closed in 1994. The current Staythorpe C was commissioned in 2010 and produces enough power for around 2.8 million homes. The site has a history of power generation of almost 80 years since the original

The description being referred to appears at paragraph 74 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)] as part of a general description of the landscape of the site and study area. It describes the study area as predominantly rural (paragraph 73) with some influence (described as 'more urbanising' – i.e. less rural) from the transport corridors and power station to the east and south. The description is not intended as 'justification' for the development – which is not the function of an LVIA.

Effects on the Mid-Nottinghamshire Farmlands and its constituent character types are assessed in section 7.7.9 of the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)] and A7.5.2 of **ES Volume 4, Appendix A7.5: Non-Significant Effects** [[EN010162/APP/6.4.7.2](#)] [[APP-212](#)] and noted in the relevant representation.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

approval in 1946. Staythorpe C is substantially lower in height than the previous two coal fired power stations and its location adjacent to the south-east corner of the Order Limits means that it does not impact on the majority of the 18,199.7ha of land over which the development is located.

The Order Limits area is crossed by four overhead power lines, at the Staythorpe National Grid Connection Point a number of other overhead lines connect going off to the south and south-east away from the Order Limits. These overhead lines are prominent but are not an urbanising influence in the way the applicant suggests.

Even if the applicant's contention that existing infrastructure has an urbanising influence was accepted that is not justification to add such large-scale infrastructure that would have an industrialisation impact on the landscape. Indeed, to the contrary, there is stronger justification to conserve the unspoilt aspects of the landscape.

GNR is proposed in the Mid-Nottinghamshire Farmlands and Trent Washlands Regional Character Areas. Most

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

of the Landscape Character Areas are in Good or Moderate Condition and have actions related to the principle of conserve in the Newark & Sherwood Landscape Character SPD. For the Mid-Notts Farmland the SPD says: "The power generating industry warrants separate consideration due to its enormous impact on the landscape of the region. There are two functioning coal-fired power stations located in the neighbouring Trent Washlands, Cottam, and West Burton to the east. The power stations and associated web of high voltage power lines, of which 4 cross this character area, constitute the most dominant and visually intrusive landscape features within and out-with the Mid-Nottinghamshire Farmlands."

The PEIR identified that: "Mid-Nottinghamshire Farmlands / Village Farmlands with Ancient Woodlands - Taking account of the Large, Medium and Small-scale changes to character across the south, centre and east of the LCT – a Wide extent – impacts on the LCT would be of Large/medium magnitude and effects would

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

be Major/moderate, Adverse and significant.”

The ES Non-Technical Summary in section 7.5 concludes: “Significant, adverse effects would arise during construction and early operation on the one landscape character type (LCT) which would host most of the Development. This results from the physical presence of the Development within it and the locally characteristic rural views of villages, separated by gently undulating arable fields bordered by hedges, changing to include close views of solar panels and the substations and BESS.”

The ES continues: “The significantly affected landscape character type - Mid-Nottinghamshire Farmlands / Village Farmlands with Ancient Woodlands LCT is a larger scale, flatter arable landscapes with hedges and woodlands characteristically dividing the fields. Ancient woodland is also a characteristic component which would not be affected by the Development. Effects on other landscape character types would not be significant.”

The landscape around our property is a gently rolling landscape dominated by the

Summary Position of Interested Party	Applicant's Responses
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Paul Mitchell and Pamela Gladwin [RR-169] [RR-174]	
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<p>arable fields and pockets of woodland and when the OSR is in flower it is as picturesque as the rolling hills of Tuscany. Visitors to our home are often struck by the peace and tranquility, the local wildlife and birds and the beauty of the open countryside.</p>	
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<p>The proposed Solar PV arrays in the area of our dwelling are proposed to be sited on sloping land which will accentuate the landscape impact. Array area W.3 will rise by almost 15m from the north-eastern end of the array to the south-western end of the array. This will accentuate the prominence of the array from Kersall Road and our property. We are set at a lower level than W.3.</p>	<p>Paragraph 2.10.27 of the NPS EN-3 recognises that utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. As set out at Section 6.3 of the Planning Statement [EN010162/APP/5.4A] , the Applicant accepted that there are limited number of residential properties where visual impacts would result from the Development, including [REDACTED]</p> <p>Effects on residential visual amenity at [REDACTED] are considered in detail on page 10 of ES Volume 4, Appendix A7.6: Residential Visual Amenity Assessment (RVAA) [EN010162/APP/6.4.7.6] [APP-213] and are not judged to reach the highest level of magnitude or exceed the RVA threshold.</p>
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<p>Change Requested – Array area W.3 should be set back to be at least 100m away from the curtilage of our property, with the set-back area subject to significant tree planting.</p>	<p>It is not considered that the design changes suggested in the representation are required to mitigate effects in the context of policy in NPS EN-1 (5.10.26-5.10.27) which states that: <i>“Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function - for example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function.”</i></p>
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<p>Array areas W.1 and W.2 will rise from the south adjacent to the beck as it moves northwards to Kneesall Road. The slope rise here is over 5m and these two array areas</p>	
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Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

will be in the direct eye line from our property. The scheme leaves a gap between W.1 and W.2 to the north-east of our property; although this is welcomed, the eastern half of W.1 will be unduly prominent because of the existing gap in vegetation and the sloping nature of the topography.

Change Requested – Array area W.1 should be reduced by around a third in area, with the eastern third used as diverse grassland.

Whilst we do not consider the proposal to be acceptable as a whole, if it were to be permitted then the above suggested changes would mitigate the impact on our property from a landscape perspective.

Please refer to the map shown in the Party's submission.

Solar Glint and Glare

We are concerned about the potential for solar particularly from the Array areas W.1 and W.2. We have floor to ceiling windows facing directly on this aspect. Those two array areas will be facing towards our property with the sloping topography

The array areas referred to by the response relate to those to the north of Dwelling 55, as shown in Figure A16.6.1.6 of **ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]**. Whilst it is acknowledged that parts of these arrays may be visible from Dwelling 55, visibility does not necessarily mean glint and glare is inevitable; due the combination of the relative position of the array and receptor, coupled with the angle and azimuth of the panels and angle of the sun, no reflections are geometrically possible at

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

accentuation the amount of PV surface that will be visible. At the closest W.1 is 180m north of [REDACTED] as such according to document 6.4.16.1 – Technical Appendix A16.1 – Glint and Glare, this property is within the 200m distance to have a Glint and Glare assessment undertaken. We note that our property is identified as 'Dwelling 55' in the glint and Glare Technical Appendix.

The Technical Appendix suggest that based on modelling our property will experience no glint or glare. This conclusion seems illogical given that there is a direct line of sight from our property to both array areas W.1 and W.2. Our property is at a height of just above 60m AOD and as such we will look down on these array areas that will rise from 50m AOD up to just under 65m AOD.

We are concerned that during modelling it was identified glint and glare would occur as the land between W1 and W2 has been removed and has now been designated as grassland. In reality we are concerned that sufficient land has not been removed – namely the eastern 1/3 of W1. The orientation of our house to the fields together with the location of the windows

Dwelling 55. This is normal for receptors located to the south of a south-facing array at UK latitudes.

The removal of part of this array at PEIR stage was due to factors other than Glint and Glare; its removal had no effect on the results for the reasons described above. Equally, the removal of further sections of the array as suggested by the respondent would also have no effect on the duration of glint and glare, no glare is predicted in any case.

Summary Position of Interested Party	Applicant's Responses
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Paul Mitchell and Pamela Gladwin [RR-169] [RR-174]	
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has direct line of sight on that section of the field. We invite you to inspect this aspect from our property.	
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Change Requested – Array area W.1 should be reduced by around a third in area, with the eastern third used as diverse grassland.	
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<i>Health, Safety and Security</i>	
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Electromagnetic Effects	
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It is noted that burying the high voltage cables does act as mitigation for electromagnetic effects from the cables.	
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It is understood that inverters produce electromagnetic radiation during operation. This radiation mainly comes from the switching power supply and output transformer inside the inverter. However, we have been unable to see in the documentation the output power of the inverter and consequently the intensity of electromagnetic radiation it will generate; in order to ascertain whether the inverter within array area W.3 would be within the range specified by international	
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	Potential effects of electromagnetic fields are assessed in section 16.6 of ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] , which concludes that no significant effects from electromagnetic fields are anticipated, and hence there are no anticipated effects on human health from electromagnetic fields.
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	The chapter considers EMF from cables/wires. This approach used was agreed in the EIA Scoping Opinion, ES Volume 4, Appendix 3.2: EIA Scoping Opinion [EN010162/APP/6.4.3.2] [APP-198] . The International Commission on Non-Ionizing Radiation Protection ('ICNIRP') sets guidelines for public exposure to EMFs from power lines and substations. These guidelines are designed to ensure that EMFs do not interfere with human health. Page 5 of guidelines published by ICNIRP state that 'Overhead power lines at voltages up to and including 132kV, underground cables up to and including 132kV and substations at and beyond the publicly accessible perimeter are not capable of exceeding the ICNIRP guidelines for exposure to EMF'. The Inverters would be below this threshold, and so the Applicant considers that there would not be the potential for significant adverse effects on human health from this component.
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	As stated at paragraphs 200 to 202 of the ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] , at all locations where members of the public may be, the magnetic field strength is 149.8 µT at a depth of at least 60 cm below the surface of the
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Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

electromagnetic field safety standards, so as not to cause harm to the human body.

We are also unaware whether it has been considered whether there are issues arising from a circular array of panels around a home which is what we effectively have – we note the World Health Organisation recommends distances of 1.2miles from solar farms to ensure electromagnetic fields do not impact human health.

Change Requested – we have already requested that array area W.3 should be set back to be at least 100m away from the curtilage of our property, with the set-back area subject to significant tree planting. The inverter should be relocated away from the roadside to the rear of the site to be away from the possibility of human receptors.

We request that detailed research is made available regarding the impact of large areas of solar on human health.

ground, which is less than the 360 μ T ICNIRP threshold value in relation to all residential receptors. This confirms that the public would not be anticipated to remain in the locations where the reference level would be reached for significant amounts of time. The public would not be exposed to long-term, low EMFs or above reference levels of high EMFs. As such, the policy requirement in NPS EN-5 would be met.

Noise

In terms of noise, we note that our property is receptor H89 in document AS-044
Response to Section 51 following

The noise limit of 65 dB LAeq,t during construction activities applies to receptors regardless of use, and as such the assessment inherently covers mixed residential / workplace receptors. While [REDACTED] is located close to the area exceeding 65 dB LAeq,t, as discussed in

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

Acceptance - 6.3.12A Environmental Statement Volume 3, Chapter 12 Noise and Vibration Impact Assessment Figures - Rev 2.

- Figure 12.2NW shows part of property in the 'Area exceeding 65 dB LAeq,t during hardstanding construction activities'.
- Figure 12.3NW shows our property to be within the 'Area exceeding 65 dB LAeq,t during PV module installation'.
- Figure 12.5NW shows part of property in the 'Area exceeding 65 dB LAeq,t during cable route installation.'

As indicated earlier, [REDACTED] is not only our family home, but it is also the location of our business, P M & G Chartered Accountants (P M & G Limited Registered in England No. 4525838). As such this is a location where we are based 24/7 and is a location visited by clients.

We are particularly concerned about the noise impact on the business activity which requires a quiet environment in order to allow suitable care and attention to be given to the complex accountancy work. It was clear when we highlighted to the applicants

Section 12.7.1 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055]**, any receptors located within the area exceeding 65 dB LAeq,t would only experience noise at this level for less than 10 days in total, and therefore not significant in terms of EIA regulations.

With regards to construction mitigation, Section A5.3.5 of **ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]** states that a detailed Construction Noise Management Plan (CNMP) will be developed by the contractor based on the finalised location of construction activities and equipment to be used on site. Where required, the requirement for any mitigation (including but not limited to those suggested by Paul Mitchell and Pamela Gladwin) will be considered and as part of the CNMP. The CNMP will be submitted to NSDC for approval as part of the final CEMP. This is secured by a requirement of the **Draft DCO [EN010162/APP/3.1B]**.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

at the consultation event that our property was also our business working environment that they were unaware of this and hadn't taken this into account.

The noise contours shown impacting on the property seem to arise from the development to the west of Kersall Road. This further supports the justification that the extent of array area W.3 needs to be reduced and moved away from our property.

Change Requested – We have already requested that array area W.3 should be set back to be at least 100m away from the curtilage of our property, with the set-back area subject to significant tree planting.

Mitigation During Works Requested - The applicants should be required to install a noise monitor at our property which can be remotely monitored. Works should stop if the noise exceeds 5 dB LAeq60 above the previously measured background noise level. This should be supplemented by temporary acoustic barriers attached to Heras fencing along the western hedge line of Kersall Road.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

Traffic and Access

We note that the existing field access opposite the 'layby' outside of our property will be used as a primary access for works as shown on Figure 14.4 NW (Site Access Locations). This will be retained afterwards as an access into the array compound. We are concerned that use of this access point during construction works will lead to noise and disturbance which is difficult to mitigate. Consequently, we consider that this access should not be used for construction works but could become the access point post construction for management and maintenance; provided that surface water run-off can be appropriately managed (see our comments on flooding).

We are also concerned that the traffic measures proposed during the works have not taken into account the need for clients to visit our premises. It is imperative that any highway closures must be programmed such that access should be available from Kersall Road either from the north or south-west at all times.

Section A5.2.7.12 of **Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2]** confirms that a community engagement contact will be made available. Contact details will be made available prior to commencement of construction and can be used to express any issues relating to noise and disturbance during the works.

Any temporary road closures shown on **Traffic Regulation Measures Plan [EN010162/APP/2.13] [APP-032]** will be undertaken in agreement with Nottinghamshire County Council and will ensure that access to properties is maintained.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

Change Requested – The primary access shown on Figure 14.4 NW (Site Access Locations) opposite the 'layby' outside of our property should be removed as an access to be used during any and all construction works and during operation unless surface water run-off can be appropriately managed.

Mitigation During Works Requested - The applicants should set out a street works programme that any highway closures must be programmed such that access should be available from Kersall Road either from the north or south-west at all times.

Land Use

As is outlined in the National Policy Statement, the starting position for solar PV developers in taking forward Nationally Significant Infrastructure Projects is that applicants should seek to minimise impacts on the best and most versatile agricultural land (BMV), defined as land in grades 1, 2 and 3a of the Agricultural Land Classification and preferably use land in areas of poorer quality.

Please refer to the Land Use response above, on Page 37.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

The Written Ministerial Statement clarified that: "This means that due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary. Applicants for Nationally Significant Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible."

The land within the Order Limits is mostly level or gently undulating agricultural land, and mostly in arable use. Some root crops are grown in the southern part of the site including some sugar beet, but most land use is cereals with arable break crops. There are a number of farms involved within the Order Limits.

West of the River Trent almost all the land falls into the moderate or high likelihood of BMV. East of the River Trent the pattern is

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

more mixed. The ES in table 17.5 identifies that 149 ha (8.5% of the Order Limits is Grade 2 ALC, with 944 ha (53.5% being Grade 3a ALC), 596 ha (33.8% is Grade 3b ALC, with the remaining 75 ha (4.2% being roads, woodlands etc.). The Agricultural Land Classification Figure 17.1 in the ES shows significant areas of solar PV proposed for Grade 2 agricultural land, notably around Weston, Sutton on Trent and Carlton on Trent in the North-East quadrant; near Kersall in the North-Est Quadrant; and near Maplebeck in the South-West quadrant. Large parts of Grade 3a ALC are also impacted by Solar PV in the same general areas. It is unclear as to how the site selection process has had proper regard to avoiding BMV land as the National Policy Statement and the WMS requires.

Change Requested – The proposal should be amended so as not to use any Grade 1, Grade 2 or Grade 3a agricultural land.

Food security

This development is one of a number of proposals in the region which is very much an agricultural region of some very

Please refer to the Land Use response above, on Page 37.

Summary Position of Interested Party	Applicant's Responses
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Paul Mitchell and Pamela Gladwin [RR-169] [RR-174]	
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<p>productive farmland. To give some perspective of the impact this project alone has on food production if the 1,765ha within the order limits was all growing wheat which was intended for the production of bread that represents ~28,000,000 bread loaves. Alternatively if all the land was grassland intended for milk production then that represents ~35,000,000 litres of milk required to be sourced from elsewhere. Based on average consumptions this production is sufficient to provide bread or milk for ~ 500,000 people.</p>	
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<p>Change Requested – The proposal should be amended so as not to use any Grade 1, Grade 2 or Grade 3a agricultural land.</p>	
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<i>Flood Risk, Drainage and Water</i>	
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<p>Flooding</p>	
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<p>It is noted that the revisions to the layout have been positive from the perspective of flooding. Although areas of mitigation/enhancement are still located within flood zones 2 and 3, as are some areas of cable trenches. The submitted FRA accepts that the National Grid Substation</p>	
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	<p>Pluvial flooding for all aspects of the Development is assessed in Section A9.1.2.3 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] and concludes that the risk of pluvial flooding is Low to Negligible, including PV arrays which are raised above ground level.</p>
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	<p>As outlined in Section A9.1.2.3.1 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] the PV arrays would be located above the pluvial depths (i.e. would be safe) and the thin nature of the PV racking would cause no perceptible loss of pluvial</p>
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Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

lies within the flood zones as does the Staythorpe BESS which is already consented. Whilst it is accepted that any connection to the Staythorpe Grid Connection Point would necessitate additional infrastructure in the area of flood risk. Nevertheless, there has been no sequential test undertaken of connecting to the grid at an alternative location. Other grid connections in the area such as at High Marnham for example are not at risk of flooding.

In relation to Pluvial (Surface Water) Flooding this needs to be considered equally to fluvial flooding. It is pertinent to understand that local flood events have in recent years occurred both as a result of fluvial and pluvial flooding events.

The solar PV to the west of our property is in an area at high risk of surface water flooding (1 in 30 annual likelihood of flooding) as well as at medium risk of surface water flooding (1 in 100 annual likelihood of flooding). This is deeply concerning given that our property has previously been inundated by surface water

floodwater storage, the Sequential Test does not need to apply the for this aspect of the Development.

As set out in Appendix 1 of the Planning Statement (Sequential and Exception Test Report) [EN010162/APP/5.4A], securing a viable point of connection ('POC') to the National Grid is a critical factor when developing renewable energy schemes. A 'Site Search Area' was identified for the Development, comprising land within a 15 km radius of the National Grid Staythorpe Substation being classified as potentially suitable. The Sequential Test analysis demonstrates that there are no suitable and reasonably available sites appropriate for the Development in areas with a lower risk of flooding and therefore the Sequential Test is satisfied.

It should be noted that a strip of land to the west of Kersall Road is demarcated for Mitigation and Enhancement, which could comprise scrapes, as discussed with the residents of the property mentioned in **RR-169 and RR-174** during the consultation event in January 2025. This could assist in alleviating the existing surface water runoff from Fields 270 and 100, and indeed Kersall Road, draining to the layby to the west of the property in mentioned in **RR-169 and RR-174**.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

run-off from this area. Included, as an appendix, are photos that illustrate this.

The surface water flood maps demonstrate that the route of surface water flooding is from the land west of Kersall Road onto the road, into the layby and then into our property. This collects in our courtyard. There is considered to be no justification for including Solar PV panels in areas at medium or high risk of surface water flooding. As the applicant has acknowledged the need to remove Solar PV from areas at risk of fluvial flooding; then applying the same principles; Solar PV should be removed from areas at medium or high risk of pluvial flooding.

The proposal at present is inconsistent with the NPPF which seeks to direct development away from areas at medium or high risk of flooding from all sources. Around our property it is not considered that there is any justification for siting the solar PV in an area at risk of pluvial flooding.

Change Requested – We have already requested that array area W.3 should be set back to be at least 100m away from the curtilage of our property, with the set-back

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

area subject to significant tree planting. There should be no solar PV sited in any land which is at risk of pluvial (surface water flooding) within the catchment of our property.

Change Requested – The development should be amended to include a new system to collect surface water run-off and flooding to the west of Kersall Road and from Kersall Road itself to ensure that the water flow is managed and attenuated to run into the watercourse to the northern end of array area W.3. If retained the primary access opposite the 'layby' outside of our property must ensure that surface water run-off can be prevented from reaching Kersall Road at all times, even in extreme weather conditions.

Cultural Heritage

██████████ is shown as being on the HER on the plan 2.15 Statutory and Non-Statutory features of Historic Environment Plan - Part 3 of 4. However, I can't immediately find anywhere an assessment

██████████ is noted in **ES Volume 4, Appendix A11.1: Archaeological Desk-Based Assessment** [\[EN010162/APP/6.4.11.1\]](#) [\[APP-251\]](#) [\[APP-252\]](#) [\[APP-253\]](#) [\[APP-254\]](#).

Summary Position of Interested Party

Applicant’s Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

of impact on the farmstead in terms of heritage.

Principle of Development

In the location of our property over 300 acres of agricultural land are proposed to be converted to fields with solar panels which is a complete industrialisation of the local area of rolling landscapes akin to Tuscany. Our property, as stated by the applicant, remains one of 6 severely impacted properties (initially there were substantially more and many steps have been taken to remove properties from the severely impacted list.) We believe further steps can and should be taken to address the impact on our property and have stated above minimal steps we believe are necessary to mitigate some of the extreme impact. Our view is that it would be preferable to remove W1, W2, and W3 completely from the proposal in order to remove us from the severely impacted list. The suggestions within the body of this letter would assist with landscape visual impact, noise, flooding, glint and glare all of which currently affect our property.

The Applicant has consulted with impacted residents during the pre-application period and made adjustments to the design where possible to reduce visual impact.

As outlined by paragraph 46 of **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4]** [\[APP-047\]](#), the Site has been carefully selected to avoid or reduce visual effects on residential amenity with the considerations of other physical, environmental and practical factor. This is to ensure that infrastructure is located away from residential properties and that impacts are minimised where possible. **The Design Approach Document [EN010162/APP/5.6A]** provide further details regarding how the design evolved throughout the pre-application stage.

Concept Design Parameters and Principles [EN010162/APP/7.14A] secures that construction compounds will not be located within 300m of residential properties.

As set out within Section 7.3 of the **Planning Statement [EN010162/APP/5.4A]**:

“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.”

In this context, a reduction to the scale of the Development is not considered to be a reasonable alternative, in order to maximise the energy generation potential of the

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

I would ask that the Examining Authority consider carefully the above matters alongside previously submitted comments.

Development in line with the Applicant's grid connection offer. Further details on this are set out in **ES Volume 2, Chapter 4: Alternatives** [\[EN010162/APP/6.2.4\]](#) [\[APP-047\]](#).

Footpath / recreation

A new footpath is planned to the west and north of our property. We respectfully request that the footpath across the fields is all at the northern side of the planting and not the southern side of the planting to minimize the increased threat of security to our property.

Security

We have serious concerns about the increased threat of security to our property posed by the creation of a footpath in close proximity to our home which will result in increased numbers of people in the local area which has historically been negligible.

The following raises specific questions regarding the proposal as it has been documented so far.

The proposed changes to the PRowWs are outlined in Section 18.6.1 of **ES Volume 2, Chapter 18: Recreation** [\[EN010162/APP/6.2.18A\]](#), with supporting information provided in the **Public Rights of Way Diversions and Permissive Routes Plan** [\[EN010162/APP/2.4\]](#) [\[APP-020\]](#) and **ES Volume 4, Appendix A4.1: Public Right of Way Strategy** [\[EN010162/APP/6.4.4.1\]](#) [\[APP-200\]](#). **ES Volume 4, Appendix A18.1: Outline RRMP** [\[EN010162/APP/6.4.18.1A\]](#) provides measures to manage closures, diversions, and new permissive routes.

The Applicant will install and maintain the proposed permissive routes for the lifetime of the Development. The proposal is for a permissive footpath and hence will not allow vehicular access. Proposed permissive footpath 9 and 12 are 100 m to the north and 200 m to the south, respectively, at their nearest point within the field to the hedgeline of the property. The public road is adjacent to the property.

Omission of Non-Designated Heritage Assets

The approach to assessing non-designated heritage assets is set out in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology** [\[EN010162/APP/6.2.11\]](#) [\[APP-054\]](#) at table 11.1 and in section 11.5. The resulting assessments are set out in **ES Volume 2,**

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

Despite the well-documented heritage importance of [REDACTED] the methodology for assessing heritage impacts appears to have excluded non-designated heritage assets close to the project boundary. This approach is inconsistent with best practices observed in other solar development projects, including those classified as Nationally Significant Infrastructure Projects (NSIPs). 4 National Policy Statements (NPS EN-1 and EN-3) explicitly state that non-designated heritage assets should be considered in impact assessments, recognising that their significance derives not only from their physical presence but also from their setting. Specifically:

- Paragraph 5.9.3 of NPS EN-1 emphasises that the setting of heritage assets is integral to their significance.
- Paragraph 2.10.118 of NPS EN-3 warns that large-scale solar developments can cause substantial harm to heritage assets and their settings if not carefully planned. The omission of [REDACTED] and other non-designated heritage assets

Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [[APP-054](#)] and ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2A].

A Local List of non-designated heritage assets is currently being compiled by Newark and Sherwood District Council and is not yet publicly accessible.

The approach to assessing the contribution made by setting to the significance of heritage assets follows Historic England guidance as set out in The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3. (Second Edition). The guidance notes that 'Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all'.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

from their assessment methodology is both inexplicable and contrary to these policies.

Heritage Impact Assessment

We have identified the following with respect to the proposed developments impact on the heritage of our property and the surrounding area:

1. Intrinsic Heritage Value: The property has historical provenance, as evidenced by its inclusion in historic OS maps dating back to 1774 and its classification as a non-designated heritage asset by the local planning authority.

2. Impact on Setting: The proposed placement of solar panels on the following fields:

- Within 25 metres from the south-westerly boundary
- Within 250 metres of the northern boundary; and
- Within 1km of the eastern boundary

of our property would cause substantial harm to its setting, undermining its isolated rural character and degrading the wide-

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

ranging countryside views integral to its heritage value.

3. Policy Violations: The proposal overwhelmingly fails to meet the requirements of Paragraphs 2.5.2 and 2.10.97 of NPS EN-3 and Paragraphs 5.9.13 and 5.9.25 of NPS EN-1, which demand good design and sensitivity to heritage assets. The failure to integrate this into the methodology is surprising. Ignoring such evidence not only undermines the credibility of the consultation process but also risks legal challenges under the Planning Act 2008, which mandates a thorough and transparent assessment of heritage impacts.

Heritage Setting Impacts The significance of [REDACTED] setting cannot be overstated. The property is:

Isolated and Conspicuous: Positioned within an undulating landscape, it is prominently visible.

Integral to the Landscape: The property is seamlessly integrated into its rural environment, with open fields, low-

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

maintenance hedges, and wide-ranging views forming a key part of its character.

Highly Sensitive: The placement of solar panels within close proximity to the property, particularly on the fields detailed above, would visually dominate its surroundings, fundamentally altering its historic and rural character. We strongly recommend the removal of solar panels from the fields to the northern and south-westerly boundary of our property, a minimum mitigation measure to preserve the heritage value and setting of the property.

Impact on Local Wildlife

██████████ is home to a population of bats, a protected species under the Conservation of Habitats and Species Regulations 2017. These regulations implement the EU Habitats Directive and prohibit activities that harm or disturb bats, their roosts, or foraging habitats. The proposed solar infrastructure poses several risks to local bat populations, including:

1. Habitat Disruption: The placement of solar panels disrupts the open landscapes

Baseline studies have been undertaken to establish the status and distribution of bats associated with the Order Limits, including the area around ██████████ and these are presented in **ES Volume 4, Appendix A8.6 [EN010162/APP/6.4.8.6] [APP-219]**. The potential effects on bats, including barbastelle bats, are assessed in section 8.8.12 in **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]**. Section 8.6.5 of Chapter 8 describes how a sensitive lighting design has been included in the Development design. The assessment concludes that with appropriate mitigation measures which are secured, the Development would have no significant adverse effects.

Lighting control measures are specified in **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**.

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [\[RR-169\]](#) [\[RR-174\]](#)

and hedgerow corridors that bats use for navigation and foraging.

2. Reflected Light Interference: Solar panels can generate reflected light, which may confuse bats' echolocation, disrupting their hunting efficiency

3. Artificial Lighting: Any lighting introduced during construction or operation could disturb nocturnal wildlife, including bats. A comprehensive plan to assess and mitigate these impacts must be provided to comply with legal requirements. Furthermore, no consultation has been undertaken regarding the bat populations at [REDACTED] and this must be factored into your planning to ensure compliance with wildlife protection regulations.

Light Pollution and Heat Island Effect

The introduction of solar panels and associated infrastructure risks increasing light pollution and disrupting this natural environment. Additionally, the proposed solar park introduces a risk of a localised heat island effect, where dark, heat-absorbing solar panels raise surface temperatures. Studies have documented

Proposed lighting is described in Section 5.4.3.5 and Table 5.6 of **ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5]** [\[APP-048\]](#), clarifying that there will be no continuous lighting in any phase of the Development, and that security lighting in the solar PV fields will be infra-red (non-visible). **Concept Design Parameters and Principles [EN010162/APP/7.14A]** state that operational lighting will be limited for emergency and overnight maintenance purposes only at inverter stations, or transformer stations and will be directed within the Order limits. The Development is therefore not expected to create significant adverse effects from light pollution. Section 7.3.8 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7]** [\[APP-050\]](#)

Summary Position of Interested Party

Applicant's Responses

Paul Mitchell and Pamela Gladwin [[RR-169](#)] [[RR-174](#)]

potential temperature increases of up to 5°C in areas surrounding largescale solar developments. The proximity of this dense solar installation to [REDACTED] raises concerns about:

1. Increased ambient temperatures affecting the comfort and well-being of occupants.
2. Greater reliance on cooling systems, contradicting the sustainable aims of the project. Mitigation measures must include:
 - Moving the panels back from the house, including the fields to the north and south-west, and reducing the panel density within 750 m of the house to minimise impacts on local conditions and ensure a more sensitive integration with the surroundings.
 - Avoidance of artificial lighting visible from our property.
 - Detailed analysis of cumulative heat impacts within a 750m radius of the property.

concludes that, as a result of there being no permanent lighting, no significant effects are likely to arise at night.

Solar PV panels absorb light, by design, but turn the energy into electrical energy rather than heat, as a conventional black surface would do. There is no consensus in research about the net change in local temperature resulting from solar parks. As a first-order effect, solar PV panels should lead to no change, if compared to a vegetated surface, because the light would be converted to electricity rather than being converted to chemical energy by photosynthesis, and neither of these processes emits or absorbs heat. When compared to a bare-earth surface, the solar park should lead to a slight cooling, by taking the light energy away as electricity rather than it converting into heat on contact with the earth. Second-order effects may arise from the partial shading of the ground during the day and partial trapping of heat close to the ground at night, the net effects of which are likely to vary from location to location. No significant effect is anticipated.

3.27 RICHARD GILL

Table 3-26 Responses to Richard Gill

Summary Position of Interested Party

Applicant's Responses

Richard Gill [[RR-181](#)]

Cultural Heritage and Archaeology

Our home is a non-designated heritage asset dating back to the 18th century. Its tranquil setting is integral to its value. We commissioned an independent heritage report which concluded that the developer had failed to consider the setting of our house and recommended that all solar infrastructure be removed from Title NT332979. That advice has been ignored.

The setting of heritage assets (whether designated or otherwise) can contribute to their significance. An assessment of the effects of the Development heritage assets, both designated and non-designated, is provided in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [[APP-054](#)]**. This is supported by **ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2A]**.

The heritage report referred to by the Interested Party has not been seen by the heritage team and its conclusions cannot be commented on.

Landscape and Visual

The GNR Solar and Biodiversity Park proposal would adversely affect us. The southern and western boundaries of our property face a 42-acre field registered as Title Number NT332979, where the developer intends to install just 11 acres of panels. The nearest panels would be around 150 metres from our garden, but they would stretch right across the southern outlook of our home. From balconies, gardens, and main rooms, up to 90% of our

Effects on residential visual amenity at [REDACTED] are considered in detail on page 9 of **ES Volume 4, Appendix A7.6: Residential Visual Amenity Assessment (RVAA) [EN010162/APP/6.4.7.6] [[APP-213](#)]** and are not judged to reach the highest level of magnitude or exceed the RVA threshold. As set out at section 5.2.2.2 in the **Design Approach Document [EN010162/APP/5.6A]** design changes were made between the scoping and PEIR stages in to mitigate potential visual effects at this home.

It is not considered that further design changes are required to mitigate effects in the context of policy in NPS EN-1 (5.10.26) which states that: "*Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function - for*

Summary Position of Interested Party

Applicant’s Responses

Richard Gill [\[RR-181\]](#)

view would be dominated by arrays with little mitigation.

The developer’s own Residential Visual Amenity Assessment (R27) records a “major adverse level of effect” for our home. In reality, ours is one of the most severely impacted properties in the scheme. It is baffling that, in a project of such a size, the developer insists on causing such serious harm for what is effectively a spur off the main panel area.

Elsewhere, panels have been removed, including blocks 9-SR32 and 9-SR33 to our west, and Order Limits have been reduced. Yet the 11 acres that matter most to us remain.

example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function.”

Property

Our property benefits from express easements over Title NT332979, lasting until 2078. These rights allow us to lay and maintain services across the land. For an off-grid home, this is vital: it underpins our ability to connect to mains services if ever required. Without it, mortgage lenders –

The Interested Party benefits from the rights to lay Service Installations which are referred to in the response to Drone Defence Services Limited in Table 37 above [RR-045].

The Applicant has sought clarification from the Interested Party as to whether there are any existing or proposed Service Installations which could be affected by the Development, and it will update the Examining Authority in due course.

Summary Position of Interested Party

Applicant’s Responses

Richard Gill [[RR-181](#)]

already hesitant about off-grid homes – may refuse to lend, making the property unsellable. By building across enforceable rights, the developer creates avoidable legal conflict and undermines the viability of our home.

Public Rights of Way

The scheme also proposes a new public right of way close to our property. At present, our home is private and secluded; introducing a footpath here would cause intrusion and a real loss of privacy, allowing members of the public direct views into our garden and house.

We would welcome anyone, including the Examining Authority, to visit our home and see the scale of the impact. We have raised these issues with the developer but have been ignored. Instead, they appear to rely on compulsory purchase powers to override our easement rights and dismiss our amenity concerns on the basis that we have “no right to a view.”

We will be making full representations through our solicitors in due course.

The proposed changes to the PRowWs are outlined in Section 18.6.1 of **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**, with supporting information provided in the **Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4] [APP-020]** and **ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1] [APP-200]**. **ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A]** provides measures to manage closures, diversions, and new permissive routes.

The Applicant will install and maintain the proposed permissive routes for the lifetime of the Development. Proposed permissive bridleway 5 is 300 m west of the edge of the garden at [REDACTED] Views of the property from the route will be appropriately screened with new and retained hedgerows and tree planting in line with **ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]**.

A Community Liaison Officer will be available throughout the lifetime of the Development who will be a primary contact for any queries or complaints. Contact details will be made widely available both online and on signs across the Development. Any issues with anti-social behaviour or threats to security as a result of the proposed permissive paths can be

Summary Position of Interested Party

Applicant's Responses

Richard Gill [[RR-181](#)]

raised with the officer who will also share any concerns with Nottinghamshire Country Council.

3.28 ROBERT JENRICK MP

Table 3-27 Responses to Robert Jenrick MP

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

General

I write as the Member of Parliament for Newark to object to the proposed Great North Road Solar and Biodiversity Park project.

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 brownfield solar and work constructively to mitigate the worst impacts of large schemes. However, the scale and siting of this proposed Solar Farm are wholly unacceptable for my constituents who will be surrounded by a ring of farms which would cause harm on a scale that far outweighs any claimed benefits. 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

The need for the Development is set out in detail in the planning application. There are many local benefits to the Development which can be found in but are by no means limited to details in ES Chapters. Benefits to local communities include:

- NG+ Scheme, which offers £1m per annum in community benefit across the 40-year lifespan of the Development;
- Enhanced green infrastructure network, including over 21 km of permissive routes to improve the connectivity of the local footpath and bridleway network;
- Biodiversity Net Gain;
- Extensive habitat creation and enhancement measures, including over 25.83 ha of new native woodland

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

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 another industrial power station in the heart of rural Nottinghamshire.

(comprising approximately 64,500 trees), 50 km of new species-rich hedgerows, 22 ha of woodland ecotone, and more than 1,400 ha of species-rich grassland;

- Learning and skills support, via the EG Academy offering free, CPD-accredited online courses and in-person outreach with local colleges and job centres to support upskilling, employability, and green career pathways; and
- An estimated £1.5m – £3m in business rates to the local authority when the Development becomes operational, contributing to the provision of local services.

The Applicant considers that a rigorous and proportionate consultation process was undertaken in accordance with relevant statutory guidance and the principles set out in the **Statement of Community Consultation [EN010162/APP/5.1.5] [APP-307]**. All three phases of consultation engaged extensively with the local community to ascertain feedback, ideas and possible changes. The iterative nature of the consultation process meant that community feedback was essential in the Applicant's evolution of the Development design.

Principle of Development

The proposal is vast. It would cover approximately 1,765 hectares of land to the northwest of Newark, Nottinghamshire. Of this, approximately 1,025 hectares would be used for solar area development. Villages including Averham, Kelham, South & North Muskham, Carlton on Trent, Kersall, Maplebeck and Knaphorpe, to

A full list of cumulative developments to be considered at Stage 1 and 2 of the assessment is presented in **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]**. This includes other solar developments that are at the various stages of planning and implementation. In

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

name but a few, which the proposed site surrounds would be heavily affected. When viewed in isolation this would already be an unprecedented scheme; when considered alongside other nationally significant infrastructure projects in the locality, such as One Earth and Steeples, the cumulative impact on Newark is intolerable.

accordance with PINS Advice on Cumulative Effects Assessment, some of the developments that have been assigned a lower level of certainty have not been considered further at Stages 3 and 4 of the assessment.

Cumulative effects with existing and consented developments, as well as other proposals in planning or at earlier stages are considered in the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** . Section 7.10.7 of the ES recognises that landscape and visual cumulative effects will predominantly arise from the SSE BESS to the west of Averham, and One Earth, Kelham and Foxholes solar farms. **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** concludes that some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are considered in Section 7.9 with no new significant effects being identified.

Whilst some significant adverse effects on landscape and visual have been identified, there would not be a conflict with NPS EN-1 and EN3. NPS EN-1 recognises that virtually all NSIPs will have 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 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

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

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.

Land Use

The land in question is among the most productive agricultural land in the country. 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 Best and Most Versatile (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.

BMV land is one of the influencing factors in the site selection process. Through a systematic and iterative site selection process, the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the **Planning Statement [EN010162/APP/5.4A]** concludes that the temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region.

Flood Risk, Drainage and Water

Flooding and drainage are another serious concern. Parts of the proposed site lie close to the Trent's floodplain, an area already vulnerable to inundation. Covering so much land with panels, tracks and substations will inevitably alter drainage patterns, increase surface water run-off, and reduce floodplain capacity. There is a real risk that neighbouring villages would face worsened flooding as

There is a common misconception that solar arrays create impermeable areas as the PV array are located well above the ground surface, have drip lines and substantial gaps between rows of panels and around the edges of panels.

As outlined in the **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**, drainage measures for all aspects of the Development will ensure that runoff rates for hard

Summary Position of Interested Party

Applicant’s Responses

Robert Jenrick MP [[RR-183](#)]

a result of this scheme, an outcome that would be wholly unacceptable given recent national focus on flood resilience.

surfaces are controlled to the baseline values. Solar PV was removed from the eastern section of the site following the PEIR stage assessments and grassland, scrub, an orchard and scattered trees is proposed for areas close to the River Trent floodplain which is compatible with the EA’s “Working with natural processes to reduce flood risk 2024” FCERM research report. As such, the Development will not exacerbate offsite flooding.

There are further serious concerns about construction and safety. 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, particularly around the smaller villages is not suited to prolonged volumes of heavy goods vehicles. Residents are rightly worried about disruption and safety risks. Even if the scheme were acceptable in other respects, robust caps, routing restrictions and independent monitoring would be essential.

ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [[APP-057](#)] presents the findings from the assessment of the potential transport related environmental effects. With the secured mitigation, the assessment concludes that the effects of the Development on highway safety and disruption of access for the pedestrians, cyclists and drivers and road condition are not significant. **ES Volume 4, Appendix A14.2: Outline Travel Plan** [EN010162/APP/6.4.14.2] [[APP-284](#)] has been developed to support **ES Volume 4, Appendix 5.2: Outline CTMP** [EN010162/APP/6.4.5.2] [[APP-203](#)] to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised. Requirement 14 in Schedule 2 of the **Draft Development Consent Order** [EN010162/APP/3.1B] requires that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC.

The proposal also includes a very large battery energy storage system. Several serious fire incidents involving lithium-ion battery

ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] specifies the use of lithium iron

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

storage systems have occurred in the UK and internationally, and have shown how real the risks of fire, explosion and toxic plume scenarios can be, and how difficult they are to suppress once ignited. Constituents have pressed me on this repeatedly.

phosphate cells in the BESS, which are generally considered safer and less prone to entering thermal runaway and explosion than other lithium-ion battery technologies.

The Development incorporates the latest fire and explosion prevention and mitigation measures, in adherence with relevant international and British standards and guidelines, including NFPA 855, UL 9540, FM Global Datasheet 5-33, Allianz Global Risk Consulting, EASE BESS Safety Best Practices Guideline, NFCC guidance and the Fire Safety Order, as stated in the risk assessment in **ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A]**. The equipment procured for the Development shall be tested to UL 9540A requirements evidencing that in the event of fire, this shall not spread to adjacent enclosures, and certified to UL 9540/IEC 62619.

Fire and explosion prevention and mitigation measures include adequate separations and access (in accordance with NFPA 855) and use of an advanced multi-layered fire safety control system prioritising early detection, suppression, ventilation, electrical protection and alarms. The approach taken is to in the first instance prioritise the prevention of an emergency event, and if not possible, to reduce the likelihood of an event happening to as low as reasonably practicable. The Development includes the provision of water supply, to cool surrounding areas to further prevent the likelihood of fire spread.

Requirement 7 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** guarantees that before the start of

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

construction of Work No.5A (BESS), the full and final FSMP will be developed in agreement with the Newark and Sherwood Council and in consultation and approval by the Nottinghamshire Fire and Rescue Service and the Environment Agency. This demonstrates the commitment made by Elements Green Trent Limited to meet relevant fire and explosion safety requirements.

Furthermore, **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [[APP-059](#)]** concludes that the risk associated with a potential fire in a battery unit is not a significant effect.

Above all, there is a democratic deficit in how this project is being advanced. Residents across the Constituency this area covers 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 for a generation inside what is essentially an industrial complex. Parish councils across the area have registered strong objections, and local press reports confirm near-universal opposition to the proposal. That reflects what I have consistently heard on the ground.

The Applicant notes that the level of consultation undertaken and the information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance.

The design of the Development has evolved through technical requirements, environmental assessments, and feedback from local planning authorities, parish councils, prescribed consultees, and communities. As evidenced in the **Consultation Report [EN010162/APP/5.1] [[APP-296](#)]**, input received during consultation led to meaningful refinements, including relocating infrastructure, removing panels from sensitive areas, implementing Natural Flood Management strategies in collaboration with local partners, and delivering ecological enhancements such as new woodlands, hedgerows, and diverse grasslands. These measures aim to improve biodiversity, strengthen landscape features, and achieve a substantial net gain across habitats, hedgerows, and watercourses.

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

The consultation process was extensive and iterative, including two phases of community consultation, publication of a Preliminary Environmental Impact Report (PEIR) with an accompanying non-technical summary, public information events, and accessible communication channels. Chapter 7 of the Consultation Report details how feedback from authorities was incorporated, while Chapter 12 of the Consultation Report and accompanying Appendix 5.1.10 document the issues raised by the local community and how they informed scheme evolution.

The **Consultation Report [EN010162/APP/5.1] [APP-296]**, along with the Acceptance checklist (S55) [Appendix 1.2] and Notification of Decision to Accept Application, demonstrates that the consultation process was thorough, inclusive, and compliant with statutory requirements.

Government policy is clear that solar development should prioritise rooftops, brownfield sites, contaminated land and other industrial surfaces. Newark and the wider region have significant warehouse and logistics space, along with large commercial roofs, that could and should be exploited before sacrificing prime farmland. I have consistently made that case locally, and my constituents are right to expect the same logic to apply here.

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 cumulative impacts with other energy schemes, the flood risk implications, the

NPS EN-1 and EN-3 both clearly establish the need for the solar development. Section 3.3.62 of NPS EN-1 confirms that there is a Critical National Priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 2.10.10 of NPS EN-3 confirms the important role that solar needs to play in delivering the government's goals for greater energy independence. Rooftop and brownfield solar options are considered to be insufficient in scale, pace and at a viable cost to meet national targets. The need for the Development has been set out in **Statement of Need [EN010162/APP/7.2] [APP-324]**.

Alternatives for design and locations has been assessed, presented in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4]**

Summary Position of Interested Party

Applicant's Responses

Robert Jenrick MP [[RR-183](#)]

unacceptable construction impacts, and the real safety risks posed by battery storage.

On that basis, 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; 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 community benefit package proportionate to the scale of the intrusion.

[\[APP-047\]](#). The Development has been adequately considered to minimise impacts balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts.

3.29 RUFFORD PARISH COUNCIL

Table 3-28 Responses to Rufford Parish Council

Summary Position of Interested Party

Applicant's Responses

Rufford Parish Council [[RR-188](#)]

Introduction

The parish council's concerns relate to the impact of the proposed solar park in relation to the following:

Landscape and visual impacts within Rufford Parish are set out at section 7.7.10.5 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)**

Summary Position of Interested Party

Applicant's Responses

Rufford Parish Council [[RR-188](#)]

- Scale and density of the proposed solar arrays
- Adverse visual and environmental impact on the immediate vicinity and rural character of the historic landscape
- Irrevocable damage to the environment
- Flood risk implications
- Adverse impact on significant heritage assets in the area

[[EN010162/APP/6.2.7](#)] [[APP-050](#)] and Paragraph 49 (Group K) of **ES Volume 4, Appendix A7.5: Non-Significant Effects** [[EN010162/APP/6.4.7.2](#)] [[APP-212](#)].

As outlined in the **ES Volume 4, Appendix A9.1: Flood Risk Assessment** [[EN010162/APP/6.4.9.1B](#)], drainage measures for all aspects of the Development will ensure that runoff rates for hard surfaces are controlled to the baseline values. Solar PV was removed from the eastern section of the site following the PEIR stage assessments and grassland, scrub, an orchard and scattered trees is proposed for areas close to the River Trent floodplain which is compatible with the EA's "Working with natural processes to reduce flood risk 2024" FCERM research report. As such, the Development will not exacerbate offsite flooding.

An assessment of the effects of the Development on above ground and below ground heritage assets, both designated and non-designated, is provided in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology** [[EN010162/APP/6.2.11](#)] [[APP-054](#)]. This is supported **ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise** [[EN010162/APP/6.4.11.2A](#)] and by **ES Volume 4, Appendix A11.1: Archaeological Desk-Based Assessment** [[EN010162/APP/6.4.11.1](#)] [[APP-251](#)] [[APP-252](#)] [[APP-253](#)] [[APP-254](#)].

The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures.

Nevertheless, it is clear that the Development has adopted good design principles, mitigating environmental impacts as far as possible, through an iterative and considered design processes. As concluded in the **Planning Statement** [[EN010162/APP/5.4A](#)], there is a demonstrable need for the Development, as such, large-scale ground mounted solar schemes such as the Development are necessary.

3.30 SOUTH MUSKHAM & LITTLE CARLTON PARISH COUNCIL

Table 3-29 Responses to South Muskhams & Little Carlton Parish Council

Summary Position of Interested Party	Applicant's Responses
South Muskhams & Little Carlton Parish Council [RR-203]	
<i>General</i>	
<p>In general, the cumulative effect of this and many similar installations and proposals (and other large scale nearby projects) will transform and destroy the fabric, ecology and heritage of this area.</p>	<p>All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "<i>When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.</i>"</p> <p>These effects will be secured by implementation of the Development as described, together with the control measures as set out.</p>
<i>Land Use</i>	
<p>Questions as to need and positioning of the planned solar arrays along with the reality of the actual ecological benefits to this area are not addressed well enough in the proposal and leave many questions and worries unanswered. On top of that, there is the loss of food producing land in relation to this Country's self-sufficiency and the effects of Climate Fluctuation. The proposal does not mention, propose or predict the effects on such a change in the use of the land regarding soil viability in 40 years time.</p>	<p>The need for the Development has been set out in Statement of Need [EN010162/APP/7.2] [APP-324], which reflects the strategic need for renewable energy generation and storage which is embedded in legislation and national policy.</p> <p>The site selection process was guided by both policy principles and the technical/environmental requirements of a large-scale solar project. ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] confirms that reasonable alternatives have been studied. The iterative optimisation of the location and design of the site and the Development has minimised impacts on the BMV land.</p> <p>The assessment on soil quality is summarised in Section 17.8.1.6 of the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060]. Although there would be temporary disturbance of soils and land quality in the areas in which the construction compounds are erected, only limited areas of land would continue to be affected for the</p>

Summary Position of Interested Party

Applicant’s Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

Our main concerns that affect us locally are made from an accumulation of knowledge and experience from people who live in this area and not from "text book/laptop logic". These are some, not all of our issues with the proposal.

operation of the Development, namely the agricultural land required for construction of the base areas for fixed equipment (such as substations), the internal access tracks and the BESS compound. This would result in a temporary disturbance of 19.4 ha of BMV land during operation of the Development.

Section 6.8 of the **Planning Statement [EN010162/APP/5.4A]** sets out how the Development has met the policy testing in relation to site selection and BMV land.

Flood Risks and Drainage

This Parish is surrounded on 3 sides by water, the 4th side is water from a higher level flowing down towards these 3 areas. Experience has taught us that from the last major flood in the area, the infrastructure put in place has served well for the last 50 years with flood water being kept away from both villages but it is still concerning as flooding incidents are on the increase and water levels are already higher during the "flooding season".

Changes to landscape and other mitigation practices in areas close to this Parish will fundamentally change the way the current preventative measures work. For example, the inference that the plans for drainage in between rows of solar panels, will slow down the run-off of rainwater is questionable

As outlined in the **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]**, drainage measures for all aspects of the Development will ensure that runoff rates for hard surfaces are controlled to the baseline values. Solar PV was removed from the eastern section of the site, including around South Muskham, following the PEIR stage assessments and replaced with proposals for grassland, scrub, an orchard and scattered trees is proposed for areas close to the River Trent floodplain. These measures will act to increase roughness on the River Trent floodplain, which is compatible with the EA’s “Working with natural processes to reduce flood risk 2024” FCERM research report.

As discussed with members of South Muskham & Little Carlton Parish Council in a meeting 10th October 2024, the principle cause of flooding within South Muskham has been an overtopping of defences on the River Trent combined with an intermittent functionality of a surface water pump with a finite capacity to pump water away. By slowing surface water runoff rates in upper catchment of South Muskham and Little Carlton this reduces the potential for the surface water pump to be overwhelmed and cause a backing up of floodwater.

As such, the Development will not exacerbate offsite flooding.

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

especially when water run-off is needed to be achieved as quickly as possible to avoid meeting the flood water coursing down the River Trent from higher up the river in other parts of Nottinghamshire and Derbyshire. The locks at Cromwell, where the river becomes tidal, is only 3 miles from this Parish and adding to the volume of water before that point when the river is already high due to water from further up river, has historically caused flooding. We have no confidence in the suggestions for drainage that have been submitted.

Traffic and Access

Construction Traffic, Transport and Roads:
 At the southern end of the proposed project in map areas 38 & 39 (which are relevant to this Parish), it appears that the preferred routes will take the majority of traffic through South Muskham and Little Carlton - See Map. The two main routes through this Parish provide access to up to 18 of the 33 access points shown in the plan and no other area in this plan has such a

Traffic surveys and a review of traffic data were undertaken to understand the frequency and types of use of vehicles on the local road network, as presented in **ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]**, to inform the **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [[APP-057](#)]**.
 The Applicant's traffic survey data has been recorded by an experienced and independent traffic survey specialist and it was conducted in April 2024, February 2025 and March 2025. As stated in **Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1]**, NCC as Highways Authority, has not expressed any concerns with the reliability of the traffic survey data and they have agreed with the baseline of the **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [[APP-057](#)]**. The

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

dependency on routes to the proposed access points.

The proposal indicates that there will be a 74% increase in traffic during the construction phase but no breakdown of numbers affecting our Parish are given, nor for post-construction work. We cannot make any judgement on missing data. Our own traffic survey taken in 2019 and 2024 shows that: -

2019 – 42,632 vehicles over a 24 hours, 7 day period, on the A616 through Little Carlton with 37,117 over 12 hour period 7am to 7pm, with the lowest mean speed 44.4mph, highest mean speed 57.6mph. Speed limit on road 40mph.

In 2024 this had increased to 44,168, with 38,727 over 12 hour period 7am to 7pm, with the lowest mean speed 41.7mph, highest mean speed 51.3mph. An increase of 1,536 vehicles over a week. The decrease in the highest mean speed will be due to the installation of an interactive speed sign.

These figures do not accord with the view of the developer that the sensitive receptors

location of traffic survey locations is shown on **ES Volume 3, Figure 14.3: Traffic Survey Locations** [[EN010162/APP/6.3.14A](#)] [[AS-046](#)].

Table 14.3 of the **ES Volume 2, Chapter 14: Traffic and Access** [[EN010162/APP/6.2.14](#)] [[APP-057](#)] sets out the criteria for determining the sensitivity of a link and Table 14.12 sets out the justification for the sensitivity rating applied.

The A616 is screened into the assessment and has been considered accordingly.

Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [[EN010162/APP/6.4.5.2](#)] [[APP-203](#)] provides a framework for the management of construction vehicle movements to and from the Development, and secures measures to reduce vehicle trips to the Development. Mitigation measures include:

Section A5.2.4.2 of the management plan secures measures to control timings of construction vehicle movements in avoiding peak hour travel to mitigate potential capacity constraints.

Section A5.2.4.1 of the management plan secures the **ES Volume 4, Appendix 14.2: Outline Travel Plan** [[EN010162/APP/6.4.14.2](#)] [[APP-284](#)] which includes measures for the provision of shuttle buses to transport construction workers to and from the Order. A detailed version of the Outline Travel Plan, is to be finalised at detailed design stage.

On the adequacy of viewpoints, the 55 viewpoints were selected following consultation at the scoping and PEIR stages to represent visual receptors of varied types at different distances and directions and “*cover as wide a range of situations as is possible, reasonable and necessary to cover the likely significant effects*”, as recommended by Guidelines for Landscape and Visual Impact Assessment (LI & IEMA, 2013), paragraphs 6.20-6.21. The selection of viewpoints for the LVIA was informed by desk-based studies including ZTV mapping, followed by site survey. As such, the Applicant considers that the viewpoint selection is robust and proportionate.

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

for the A616 is low and, therefore, any impact on residents would be minimal. The effect would be quite the opposite.

On the B6325, there is a speed limit of 30mph through the village and 60mph north of the village towards the A1 junction. Again, measured traffic ignores these limits. And with extra abnormal loads and other construction traffic, without any sort of policing, this is going to cause great problems for motorists and residents. GNR seem to have not taken any of this into consideration, apart from getting the speed limits wrong in their proposal.

Furthermore, only one viewpoint of traffic has been taken on the A616 (Document reference - 6.3.7.11.7 Environmental Statement Figure 7.11.7 Visualisations Viewpoint 7 A616 near Kersall Lodge). This is over 8 miles away from the village of Little Carlton. No other viewpoints have been taken on this road that would give more accurate figures for Little Carlton.

The route map shows that a preferred route at the junction of the A616 and the B6325, is to continue along Trent Lane towards the village of Kelham. This road is well known

ES Volume 3, Figure 14.1: Traffic and Transport Study Area [EN010162/APP/6.3.14A] [[AS-046](#)] confirms that HGV construction traffic will not pass along Trent Lane towards Kelham and concerns raised are unfounded.

Frequency of trips of the Development is set out in Section A14.1.6 of the **ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]. ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [[APP-057](#)]** concludes that the effect of the increase traffic flow has been avoided where possible and otherwise minimised by careful design of the Development and the construction routes and access points. A summary of the traffic volumes changes by Development phases is provided below: Monthly traffic generation during the construction phase is calculated based on a worst-case scenario and is presented in Table A14.1.15 of **ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A8.1].**

Abnormal loads are discussed in Section 14.7.1.8 of the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [[APP-057](#)] and concludes the likely effects of the construction related abnormal loads will be negligible and temporary and therefore not significant.

ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [[APP-203](#)] confirms that prior to construction works commencing, roads to be used for construction will be subject to a condition survey and any remedial measures needed to facilitate the works agreed with the local highway authority and completed. Further interim surveys and post-completion condition surveys will also be conducted and any agreed corrective measures undertaken.

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

for flooding and being closed by the Highways Department with diversions in place. Nowhere does GNR offer any mitigation for this eventuality. Furthermore, Trent Lane is a narrow two-way country lane, with a 7.5T weight restriction in place. Abnormal loads and even normal sized construction traffic is leading to blockages in both directions and again, GNR have not addressed this point.

In their assessments, GNR have graded the A616 as being low usage and with the ability to absorb the additional traffic from this proposal. This is not a valid proposition and does not reflect the high usage we know this road suffers from.

We know that since 2020, traffic volume along the B6325, A616 and Trent Lane has increased thanks to sat-nav rat runs and diversions. When the A1 is closed for whatever reason, these roads are the diversion route. Without mitigation, these roads will place an unacceptable deterioration on the quality of life in this Parish. Already the road decay from the heavier traffic using our roads and the increased vibration damage is apparent as

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

is ignoring speed limits and safety for locals. The increased traffic will affect the quality of life in this area and to imply that lorry drivers will adhere to only the approved route is also a concern.

There is only a pavement on one side of the road along both the B6325 and the A616. Trent Lane, whilst used by pedestrians, has no pavements. Although not shown as a designated route, there are no pavements within the residential centres of the villages, where roads are narrow and in places single track. Recent work on the A1, which saw traffic diverted along the A616, led to HGVs and other vehicles cutting through the villages and becoming stuck with no places to turn without structural damage to residents property. Residents are fearful of the increased traffic this development will bring and are fearful of the risk of collisions and intimidation large traffic brings.

Other roads off of the preferred route are entirely unsuitable for heavy construction traffic and again, GNR have failed to address this in their proposal.

Summary Position of Interested Party

Applicant’s Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

There will be an unacceptable, increased level of traffic noise experienced by sensitive receptors in our village (there is a play area adjacent to the B6325, shops and businesses along the route, and residential properties in close proximity to both the B6325 and A616).

The results of the construction traffic noise assessment are summarised in Table 12.9 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12]** [APP-055]. Table 12.9 shows that the largest increase in road traffic noise due to construction vehicles is 2.1 dB on Caunton Road. This is a Low impact in terms of the best practice assessment criteria described in Section 12.4.4 of **ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12]** [APP-055], and not significant in terms of the EIA regulations.

PRoWs

Public Footpaths:

As outlined above, there are only footpaths along the A616 and B6325 on one side of the road in both cases. There are proposals to add footpaths as shown in both plans 38 and 39 of the Public Rights of Way and Permissive Routes Plan Great North Road Solar and Biodiversity Park DCO Drawing Number EN010162-APP-2.4. This Parish Council has no issue with these proposed routes and connectivity with existing footpaths.

The proposed changes to the PRoWs are outlined in Section 18.6.1 of **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**, with supporting information provided in the **Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4]** [[APP-020](#)] and **ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1]** [[APP-200](#)].

New permissive routes have been proposed to increase the connectivity of the network during the operational phase, including 21 new permissive footpaths, and six new permissive bridleways, creating 32.6 km of new permissive route (as described in Table 18.7). A circular recreational route would be created around the Order Limits, covering 50.6 km, including 12.5 km of new permissive path.

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

Cultural Heritage and Archaeology

The fields that lie between South Muskham, Little Carlton and Bathley are rich in heritage as they contain monuments that relate to the extensive history of our communities.

Little Carlton was originally a medieval village and part of the meadow field system, and there is evidence of two medieval ponds, one of which still holds water and borders one of the medieval field enclosures. While the areas of Little Carlton used during the Middle Ages are now only earthworks or buried remains including sunken gulleys, some rectangular earthworks remain (some of which are believed to be footprints of houses). These fields have been outlined for mitigation but we have no knowledge of what this means and what the proposals are. These fields hold vital evidence that relates to the history of our community and should be sacrosanct and protected from any development. They should be removed from the masterplan.

Turning this rural area into a semi-industrialised one, will cause immeasurable

An assessment of the effects of the Development on both above ground and below ground heritage assets is provided in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054]**. The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures.

A final AMS will provide details on any areas of archaeology to be subject to further evaluation prior to detailed design, the techniques to be employed as well as a programme in the context of the post-consent, pre-construction period. It will also provide an outline programme for mitigation works including post-excavation assessment, analysis, publication and archiving.

Summary Position of Interested Party	Applicant's Responses
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South Muskham & Little Carlton Parish Council [RR-203]	
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harm to our history which dates back to the Domesday Book, and to the future use of the land.	
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<i>Land Contamination</i>	
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A major concern is the use of underground cabling proposed for this project. Nowhere in the application does GNR address small particle (micro) plastic contamination arising from the natural deterioration of these cables while underground. With no mention or mitigation, we cannot accept the proposal as it stands.	<p>The Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A] includes a commitment to prepare a Construction Site Waste Management Plan. It sets out an Outline Construction Site Waste Management Plan (CSWMP), which seeks to protect the environment from issues arising from waste through the implementation of effective waste management plans which relate to the management of waste during the construction phase of the Development. The Principal Contractor will be responsible for the implementation of the CSWMP. This is considered to provide robust and effective controls that avoid impacts associated with construction stage waste, including the potential for plastic pollution from packaging and construction waste.</p>
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<i>Ecology and Biodiversity</i>	
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We are extremely lucky with the wildlife that we currently have, who call the fields in and around South Muskham and Little Carlton their home. Even being so close to Newark, the A1, A616 and East Coast Main Line, the area teems with a diverse mix of birds, animals and insects. There are currently no proposed compensation measures to deal with loss of habitat.	<p>A range of baseline studies has been undertaken to establish the status and distribution notable and protected species in the area around South Muskham and Little Carlton 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 breeding status and locations of birds, including those cited by the Council, are presented in ES Volume 4, Appendix 8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4] [APP-217].</p> <p>The potential effects on these features, and the associated mitigation (including compensation and enhancements), are assessed in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]. The assessment concludes that with</p>
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Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

The fields planned for mitigation provide ground nesting for Short-eared Owls, Grey (English) Partridge, Skylarks, Lapwings and other species. We also have Kingfishers – seen only two weeks ago for the first time in the field marked for construction. The presence of the Kingfisher determines that the small watercourses through the fields have fish inhabitants.

Swans – we regularly have pairs raising their cygnets on the lakes and the stream that pass through the field that runs along the B6325.

We also have Grey Herons (including a local heronry).

These fields are a vital cog in providing habitat for plants and animals and the biodiversity helps maintain ecological balance and resilience.

It is directly contradictory to the strategy and priorities of the Draft Nottinghamshire Local Nature Recovery Strategy (LNRSS) taking forward the Environment Act 2021. Nowhere with the documentation can we find any reference to this important local strategy.

appropriate mitigation measures which are secured, the Development would have no significant adverse effects.

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/6.4.8.13] [APP-226]**. Section A5.1.3.2 in **ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]** explains how the final LNRS will be considered in the final designs.

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

Principle of Development

Site Selection:

The fields proposed as part of the development around South Muskham and Little Carlton on maps 38 & 39, are graded 3(a), best most versatile land. The proposal is for these areas within the order limits to be "Compulsory acquisition of all rights and interests in this land". Areas of poorer quality land have been untouched. Furthermore, the areas within the order limits, are designated as "Works number 3" and a works description of "mitigation". Nowhere in the proposal can we find exactly what is meant by "mitigation" and as such, we object to this proposal as there is not enough information for us to consider.

We would also point out that these fields are vital in providing habitat to ground nesting birds and that will be completely destroyed or severely altered.

A description of the proposed works is provided in **ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048]**, with supporting figures provided in **ES Volume 3, Figure 5.1: Works Areas [EN010162/APP/6.3.5B]**. The description of Work no. 3: Mitigation/Enhancement is set out in Section 5.4.2.3 of the ES chapter.

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. **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]** and the **Design Approach Document [EN010162/APP/5.6A]** provide further details regarding how the design evolved throughout the pre-application stage.

Socio-economics

Visitor Centre:

The Applicant has responded the Visitor Centre matter in the Table 18.1 of **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**, noting that no visitor hub will be

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

In the original proposals, there were plans to place an unmanned, ungated, car park area along with picnic tables as well as interpretive boards describing the nature of the Solar Park and thereby designating the area as a "Visitor Centre" This Parish Council and our Parishioners are totally against the existence of this anywhere in our Parish in its entirety. The reasons for this are simply having had the experience over many years teaching us that an unpoliced, unlocked area in the countryside, will attract anti-social behaviour, fly tipping and general uncollected rubbish, unauthorised traveller camps, access issues to other areas, loss of agricultural use of land and a negative cumulative impact of the area. Furthermore, there are no other amenities in the vicinity that would get anywhere near being of use to this fantasy.

In consultation with Mark Noone of GNR, we were given verbal assurances that this facility would be removed and we are relieved to see that it does not appear on the proposal however, with the lack of definition of "mitigation" for this area (field reference 38.1 on Drawing number EN10162-APP-2.9) our fear is that a visitor

proposed and all proposals for facilities in South Muskham have been removed following the PIER stage. All recreation enhancement measures are detailed in Section **A18.1.5.7 of the ES Volume 4, Appendix A18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1A]** and no reference has been made to the Visitor Hub.

Prior to finalisation of the RRMP, consultation on the RRMP will be undertaken with the local community, details of which will be submitted to Newark and Sherwood District Council for approval prior to commencement of construction.

Requirement 18 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** secures that no phase of the authorised development may commence until a recreational routes management plan for that phase have been submitted to and approved by Newark and Sherwood District Council. This must be in accordance with **ES Volume 4, Appendix A18.1: oRRMP [EN010162/APP/6.4.18.1A]**.

Summary Position of Interested Party	Applicant's Responses
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South Muskham & Little Carlton Parish Council [RR-203]	
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centre is hidden under the umbrella of “mitigation”. Without clarification, we cannot support this and we will strongly oppose any “visitor centre”.	
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<i>Landscape and Visual Impact</i>	
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Visual Impact:	
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Mitigation proposals for aesthetics and views. The proposals for planting screens to “hide” the solar panels from view are inadequate in the sense that more mature and established plants are needed than those proposed.	
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Any positive changes to the proposal, especially those mentioned above, would be welcome however we reserve our further judgement and maintain our objection to the GNR Solar and Biodiversity Park.	
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The planting of hedgerows as mitigation for solar farms is a recommended standard approach as set out at paragraph 2.10.131 of EN-3 National Policy Statement for Renewable Energy Infrastructure. The majority of the mitigation relies on the growth of existing hedges, which would be effective more quickly than new planting – as set out at paragraph 107 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]. Hedges along northern boundaries would also include tree planting as set out in Table 7.3 and shown on the Landscape Masterplan [EN010162/APP/2.11] [APP-030]. This approach is not used along other boundaries in order to avoid trees shading solar arrays. Larger stock is not proposed as it generally does not establish as successfully and requires greater maintenance in order to do so.

<i>General</i>	
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Local Policy	
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The solar farm proposals contravenes the key issues and challenges of the Core Strategy set out in Newark & Sherwood District Council's commitment to	
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Through a systematic and iterative site selection process, as detailed in ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047], the Development minimises impacts on agricultural land in line with national policy by minimising the use of BMV as far as is practicable. Section 6.8 of the Planning Statement [EN010162/APP/5.4A] concludes that the temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of
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Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

'maintaining and enhancing the District's attractive and distinctive environment' along with 'enabling change to contribute to a higher quality of life for all residents'. This proposal will not enhance the quality of life for our residents.

National Planning Policy Framework

Due regard should be given to:

5.1 Section 11 (123) NPPF states that 'planning decisions (need to) safeguard and improve the environment and ensure safe and healthy living conditions'. Section 124 emphasises the need to 'give substantial weight to the value of using brownfield land... for.. identified need' rather than unspoilt countryside.

5.2 – Section 15 (180) emphasises the need to:

- (a) Protect and enhance valued landscapes
- (b) Recognise the intrinsic character and beauty of the countryside
- (d) Minimise impact on biodiversity

4.5 ha of BMV is not therefore considered to have a material impact on the overall supply of BMV land in Newark and Sherwood or on food production and food security of the wider region.

The Applicant has adopted a staged approach to the identification of cumulative developments, which generally follows PINS guidance. **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]** provides a full list of cumulative developments considered in that process, which then identifies a shortlist of developments to be considered as part of the Stage 3 and 4 cumulative effects assessment.

An assessment of cumulative effects of the Development with other shortlisted developments is presented on a topic-by-topic basis in the technical chapters of the Environmental Statement, Chapters 7 to 18. All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "*When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.*" These effects will be secured by implementation of the Development as described, together with the control measures as set out.

Summary Position of Interested Party

Applicant's Responses

South Muskham & Little Carlton Parish Council [[RR-203](#)]

Newark & Sherwood Planning Portal

The GNR Solar Park proposal does not meet the criteria specified on the Newark & Sherwood Planning Portal as follows:

- Overbearing impact
- Road safety
- Effect on the character of the area
- Effect on the trees or the landscape

Conclusion

This Parish Council's view is that effective use of land should be encouraged by focusing large scale solar farms on previously developed and non agricultural land.

This proposal should not be considered in isolation. The proposals, when factored into all other applications for solar farms in Newark & Sherwood District (either approved, under construction, or pending consideration) cause an overbearing cumulative impact on our rural communities. The cumulative impact, not just in Newark & Sherwood, but in North Nottinghamshire and Lincolnshire, is a significant grounds for

Summary Position of Interested Party	Applicant's Responses
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South Muskham & Little Carlton Parish Council [RR-203]	
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objection. We maintain our strong objection to this proposal.	
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3.31 SUTTON-ON-TRENT PARISH COUNCIL

Table 3-30 Responses to Sutton-on-Trent Parish Council

Summary Position of Interested Party	Applicant's Responses
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Sutton-on-Trent Parish Council [RR-213]	
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Flood Risk, Drainage and Water

Flooding is the primary concern of Sutton on Trent Parish Council.	
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Sutton on Trent is a large village conurbation with a long and continued history of flooding roads and properties, most recently during named storms in 2024. The village has benefited from flood prevention enhancements but remains under the continued threat and reality of flooding.	
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Sutton on Trent is in the unfortunate position of being the last conurbation before the River Trent, with water descending from a vast geographical area, a network of water courses and runoff into the small village	
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There is a common misconception that solar arrays create impermeable areas as the PV array are located well above the ground surface, have drip lines and substantial gaps between rows of panels and around the edges of panels.	
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As outlined in ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] , there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows, however where ground beneath panels is bare there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water from the PV arrays therefore not contributing to or exacerbating existing flooding downstream of the Site.	
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No formal attenuation is required for the solar panels 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	
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Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

dyke system, which includes areas within the subject application.

Capacities are at their peak already within the village dyke system, and concerns are raised regarding the potential increase in flooding that could occur as a result of surface water runoff and alike from such a large expanse of panels, covering the green fields that provide a natural filtration of surface water.

Put simply, Sutton on Trent cannot cope with any increase in additional water entering the village. Any development must ensure that flooding will not be exasperated and ideally modelling undertaken that goes over and above current planning requirements to ensure mitigation required provides security to those low lying villages that further flooding will be prevented.

A further concern relates to possible contaminants resulting from the proposed construction traffic (oil and diesel), ongoing cleaning and maintenance of the sites involving the use of pesticides, herbicides, fertiliser and weed control once operational, as these could all add to the issues already experienced in the poor water quality in the

on the solar panels will drain through rainwater gaps and infiltrate into the ground beneath and between each row of panels.

It should be noted that the Development is likely to provide beneficial effect on surface water run-off rates compared to the baseline agricultural scenario upstream of Sutton-on-Trent, as the fields within the Site will no longer be:

- Ploughed or furrowed;
- Left without vegetation cover for long periods in the winter; and
- Regularly traversed by heavy farm machinery.

Measures within **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**, such as regular machinery checks, the use of drip tray, spill kits and dedicated refuelling areas will limit uncontained releases of pollutants to fugitive releases (if at all). **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]** assesses the potential for chemical pollution on the water environment as Negligible and not significant.

Regarding pollution of the water environment, the fields within the Order Limits are used for arable and pastoral farming. The Development does not include the application of nitrates or phosphates to the land, which is carried out periodically via the current land use, and this cessation may lead to improvements in surface water quality, compared to the baseline scenario.

As outlined in **ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]** Work Area 1: Solar PV is located in Flood Zone 1. The Work Area located within Flood Zone 2 and 3 upstream of the dyke system draining to Sutton-on-Trent is Work Area 3: Enhancement and Mitigation, comprising grassland, scrub, and scattered trees which is compatible with the EA's "Working with natural processes to reduce flood risk 2024" FCERM research report. By having year-round vegetation cover and

Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

area due to surface water runoff from the Site, naturally discharging into these ordinary water courses on the site boundaries.

Any fields that are within Flood Zone 3 should be precluded from development.

increased trees, the roughness of the ground surface is increased compared to the baseline and therefore surface water runoff rates will be slowed.

As such, the Development will not exacerbate offsite flooding.

Ecology and Biodiversity

Whilst it is acknowledged that the solar PV area of the development is approximately 1,025 hectares (2,533 acres) or the proposed development of c.1765 hectares (4,361 acres), only c.800 acres are to be denoted for biodiversity enhancements. This equates to approximately 18.34% of the total Site and is somewhat disappointing given the name change to include 'Biodiversity Park' in the development description.

The series of open areas proposed for enhancements must be coherent and planned to optimise any benefit to the wildlife. Management of these areas needs to be secured during the life of the development but it is not understood what happens to these areas once the Site is

The total area of Work No 3. Mitigation/Enhancement is 555 ha which is 31% of the total area (1,765 ha) of the Order Limits.

ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] provides details of the proposed habitat management and an overview of the design principles which have resulted in a coherent masterplan.

Requirement 8 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** 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 accordance with **ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1A]** and must be implemented as approved.

The effects of decommissioning on all important ecological features are assessed in section 8.8 of **ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8]** [[APP-051](#)]; section 8.8.8.3 addressed the effects of decommissioning on habitats and vegetation.

Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

decommissioned. Once established, the loss of the sites would once again have a greater impact on the wildlife and should be safeguarded in perpetuity.

These areas should become features in their own right, complementing the permissive footpaths with seating provided as part of a nature walk.

Landscape and Visual Impacts

The scale and magnitude of the solar farm, including infrastructure comprising site storage facilities, perimeter fencing, and the need for CCTV columns, will cumulatively impact the character of landscape areas.

The fact that a Landscape strategy is required to screen the development demonstrates that there will undoubtedly be harm to the landscape character. The scale and broad spread of development with associated infrastructure would result in an urbanising form of development that does not achieve the policy requirements to conserve the area's landscape character. The area would be highly susceptible to the changes, and sensitivity will be higher in

As set out at paragraph 44 of **ES Volume 4, Appendix 7.2: LVIA Methodology** [[EN010162/APP/6.4.7.2](#)] [[APP-209](#)], cumulative impacts arise from the effects of the Proposed Development in combination with other developments, rather than from the development alone (regardless of scale). Landscape and visual effects with operational and consented development are assessed in **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)] and some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are considered in Section 7.9 with no new significant effects being identified.

Effects on landscape character are assessed at section 7.7.9 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)] and some significant effects during all stages of the development are identified as summarised in Table 7.6.

The planting of hedgerows as mitigation for solar farms is a recommended standard (rather than minimum) approach as set out at paragraph 2.10.131 of EN-3 National Policy Statement for Renewable Energy Infrastructure. The majority of the mitigation relies on the

Summary Position of Interested Party

Applicant’s Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

some locations and would remain so for at least 10 years (25% of its operational life) whilst any landscape mitigation establishes and matures.

The planting of an additional 60,000 trees and the laying of 50KM of hedgerows is welcomed. However, to provide mitigation from the commencement of the proposals, there needs to be a mix of different tree standards and not solely reliant on the planting of young saplings. In key viewpoints, more substantial trees should be planted from the offset.

growth of existing hedges, which would be effective more quickly than new planting – as set out at paragraph 107 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [[EN010162/APP/6.2.7](#)] [[APP-050](#)]. Hedges along northern boundaries would also include tree planting as set out in Table 7.3 and shown on the **Landscape Masterplan** [[EN010162/APP/2.11](#)] [[APP-030](#)]. This approach is not used along other boundaries in order to avoid trees shading solar arrays. No particularly sensitive views were identified that would warrant the planting of larger stock, which is typically not used as it often establishes less successfully and requires greater maintenance to do so.

Land Use

The Site is acknowledged to consist of a mix of grade 3a and 3b land qualifying as "best and most versatile" land (BVML). NPPF (2024), paragraph 187, states that planning policies and decisions should recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services—including the economic and other benefits of the best and most versatile agricultural land and trees and woodland.

Sutton-on-Trent Parish Council raised several concerns, including site selection, the justification of the use of BMV land over other land of less quality and the cumulative impact of the solar arrays. The Interested Party also raised concern on food security.

The site search began by looking for areas outward of the Staythorpe NGET Substation, and the process was guided by both policy principles and the technical/environmental requirements of a large-scale solar project. The Applicant’s site selection has avoided the use of BMV where possible and the impact on BMV land has been minimised. This is justified with the following main reasons:

- The chosen site for the Development generally sited on the poorest quality of BMV land within the area. As shown in both the provisional ALC map (ES Chapter 17, Insert 17.1) and the Natural England’s Likelihood of BMV maps (**ES Chapter 17,**

Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

Written Ministerial Statement (WMS) 'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land' was issued on 15 May 2024. The Statement advises that food security is an essential part of National security. Under 'Protecting the Best Agricultural Land' it states: "The new National Policy Statement published in January 2024 makes clear that "applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land, avoiding the use of "Best and Most Versatile" agricultural land where possible." The Government in Powering Up Britain: Energy Security Plan clarified that while "solar and farming can be complementary" developers must also have "consideration for ongoing food production." "The Site Selection has been based on the convenience of being close to the decommissioned power plant of Staythorpe. However, the cumulative impact of the solar array needs to be adequately assessed and justified why this Site has

Insert 17.2), most of the available land west of the River Trent is undifferentiated Grade 3, and there are very limited alternatives with even lower-quality agricultural land. Within this constraint, the Applicant has chosen the poorest-quality BMV land possible. Land of Grade 1 and much of Grades 2 and 3a has been avoided or minimised. As such, the Development would not result in unnecessary loss of high quality BMV land, and the use of BMV land is justified. Section 6.8 of the **Planning Statement [EN010162/APP/5.4A]** concludes that the Development has met the policy testing in relation to site selection and BMV land.

- There is a very limited loss of agricultural land or land quality. **ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17]** [[APP-060](#)] suggests that, during operation of the Development, there would be a temporary disturbance of 19.4 ha of BMV land. Following the decommissioning phase, the Development would, at worst case, result in the permanent loss of 4.5 ha of BMV. This is because the development of the layout and the environmental enhancement (as described in the CEMP) considered BMV and avoided physical disturbance (eg construction compounds, fixed equipment) in such areas where possible. The temporary nature of the Development should also be considered. The Development retains the ability to reinstate arable agriculture after decommissioning, as well as facilitating a continued agricultural use through making the land available for biodiversity management grazing throughout the operational life of the Development.

The protection and sustainable use of soil resources is provided in **ES Volume 4, Appendix A17.2: Outline Soil Management Plan (SMP) [EN010162/APP/6.4.17.2]** [[APP-290](#)] [[APP-291](#)] [[APP-292](#)] [[APP-293](#)] and the decommissioning phase works are set out **ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**.

Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

been chosen over other land of lesser quality and how other land has been discounted in accordance with the NPS EN-3, which is clear that Applicants should seek to minimise impact on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and should look to use land and areas of poorer quality.

As such, the iterative optimisation of the location and design of the site and its Development has to a greater degree minimised impacts on the BMV land.

On food security, the land use change from agriculture (only some of which is for food) to a mix of energy production and agriculture does not feature among the identified risks to UK food security. Furthermore, even when taken with the loss of other areas of BMV which have been permitted as part of the other nearby NSIPs, the impact in a regional and national context would not be significant. The use of 2,350 ha cumulatively would reduce the estimated BMV land currently utilised for farming in England (3.7 million ha) by 0.028%, which is considered to be insignificant.

If sheep grazing was permitted, it is only likely to be under the panels as other areas outside of the panels are to provide biodiversity enhancements and are not likely to be compatible with grazing. The grass beneath the panels will also likely be of low quality due to the lack of sunlight reaching the ground in these locations due to the nature of the development proposals. The solar panels are likely to be located approximately 0.6m from the ground level at its lowest level, which severely limits the ability for livestock and other associated wildlife to utilise the Site for foraging due to the perimeter fencing.

Sheep grazing has been proposed as a land management consideration. The Applicant notes that grazing under PV arrays is possible and has committed to making the land available for grazing purposes to assist with the management of the Site. The **ES Volume 4, Appendix A17.2: Outline Soil Management Plan (SMP) [EN010162/APP/6.4.17.2] [APP-290] [APP-291] [APP-292] [APP-293]** provides sets out the key principles and considerations for the handling of soils for achieving optional grazing conditions. A detailed SMP is subject to agreement with Newark and Sherwood District Council as secured in Requirement 20 in Schedule 2 to the **Draft DCO [EN010162/APP/3.1B]** .

40 years may be termed 'temporary', but 40 years of the field being out of food

Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

production could be longer if an application for repowering and life extension of the solar farm is submitted. No weight should be given to the possibility of grazing as the Site will most likely be lost to agricultural use without any agreements in place to facilitate grazing of the land.

Decommissioning

Once all the wildlife and biodiversity sites are established, it is unclear what will happen to these areas. The fact that weight is given to the temporary nature, although 40 years is half of a person's lifetime, significant weight is given to the creation of habitats and resting of the BMV land.

As technology advances, so does the lifetime of the solar arrays. NPPF 2024, Paragraph 166 (c) even states that "in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site". It seems unlikely that the Site will ever return to agricultural use and will be a permanent

The Development is committed to ensure the land will be restored to a suitable use. Section 6.9 of the **Planning Statement [EN010162/APP/5.4A]** concludes that the **Draft Development Consent Order [EN010162/APP/3.1B]** includes requirements which provide that the authorised development must cease generating electricity on a commercial basis no later than the 40th anniversary of the first export date and that a decommissioning and restoration plan must be submitted for approval by NSDC not less than six months before the 40th anniversary date.

ES Volume 4, Appendix A5.6 Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] will ensure the land will be restored to a suitable use in accordance with NPS EN-3 paragraphs 2.10.68 and 2.10.69.

Accordingly, the Development complies with NPS policy regarding the Development's lifetime and decommissioning.

Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

structure for many years far greater than the 40-year period stated.

Conclusion

It should be noted that flooding continues to be the primary concern of Sutton-on-Trent Parish Council. It is, however, clear that the Proposals will change the character and appearance of a series of arable fields, typical in this rural landscape, to an isolated industrial infrastructure development that would be visually dominant within the surrounding area and blight the outlook of those residents closest to it.

The Agricultural Land Classification report should be informed by soil analysis, and we expect the application to be submitted with a suitable Site Selection report, with the cumulative impact of solar array properly assessed and justified for loss of BMV land. It should clearly demonstrate why this Site has been chosen over other land of lesser quality and how other land has been discounted in accordance with the National Policy Statements, which directs

Please refer to the Applicant's responses provided above.

Summary Position of Interested Party

Applicant's Responses

Sutton-on-Trent Parish Council [[RR-213](#)]

development to land and areas of poorer quality.

There needs to be a landscape strategy that provides enhancements from the outset, with planting of mature trees to assist with assimilating the development from an early stage, whilst alleviating the harms to the outlook of the closet residents.

If the proposal is to be described as a 'Biodiversity Park', the biodiversity enhancements on the Site should go further than using a total of 18.34% of the Site. The existing wildlife will be displaced and habitats removed during the construction phase. The areas denoted for biodiversity should be implemented at the earliest stage of the construction if granted.

3.32 UK HEALTH SECURITY AGENCY

Table 3-31 Responses to UK Health Security Agency

Summary Position of Interested Party

Applicant's Responses

UK Health Security Agency [[RR-220](#)]

General Support

Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that:

With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 7 December 2023 (at the Scoping Opinion stage) have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion.

Noted.

3.33 JPAG

Table 3-32 Responses to JPAG

Summary Position of Interested Party

Applicant's Responses

JPAG

Consultation

From paragraphs 17 to 26 of the IP's Report, JPAG considered that the Phase Two (Statutory) consultation undertaken by the applicant was misleading and has not complied with the s51 advice. The consultation materials and the layout of the consultation events has not made it sufficiently clear that the financial community benefit through NG+ cannot be guaranteed or secured through the DCO process. The same is applicable to the suggested EG Education and ED Academy initiatives. Consultation boards such as that on the Rooftop PV Grant Scheme in fact appear to have been intended to mislead attendees that this is an integral part of the project. The consultation board on flood prevention schemes where NG+ funding for Sustainable Drainage (SuDs) again appears to mislead attendees that these are part of the overall project. Similar references to NG+ initiatives were also contained on other consultation boards.

At paragraph 20, JPAG stated that the applicant has also been explicit from the start that they will not construct and operate the solar farm but will instead sell the project on to an unspecified third party. This approach has been followed in other NSIP solar projects that have been granted nearby in Lincolnshire. This intention calls into question any of the suggestions made by NG+, EG Education and ED Academy initiatives.

Table 13.1 of the **Consultation Report [EN010162/APP/5.1]** [\[APP-296\]](#) shows that the Applicant has clearly stated in the responses that the community benefits package, known as NG+, forms no part of the DCO proposals (it is separate and voluntary) and is not considered by the SoS as part of the DCO application.

It is considered that the level of consultation undertaken, and information presented throughout the pre-application stage, met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in the **Consultation Report [EN010162/APP/5.1]** [\[APP-296\]](#) which was submitted to the Planning Inspectorate and accepted for examination.

The Applicant has advised that the project could be sold partially or in full to another party such as investor or an operator, and that this is not unusual for this type of projects.

Summary Position of Interested Party

Applicant's Responses

JPAG

At paragraph 27 to paragraph 39, JPAG raised concerns on the inadequacy of consultation, and the applicant did not seek to engage with the Parish Councils over the timing and duration of the statutory consultation period, thereby the applicant did not comply with the guidance (Reference ID 02-022-20240430)

General

From paragraphs 40 to 50, JPAG raised concerns about the overestimation of the potential electricity generation and the assumptions on the number of homes that could be powered does not appear to be based on cogent or substantive evidence.

Calculations suggest a substantial carbon avoidance from the BESS element of the scheme; it remains unclear how this is calculated because the BESS will not in itself produce electricity.

JPAG suggested that the project links to the Staythorpe grid connection and consequentially to the Staythorpe Power Station. That is a gas power station and as such the consideration of scope 3 emissions being considered as indirect environmental effects that must be included in an EIA.

Section 15.2.1.2 of the **ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15]** [[APP-058](#)] states that a worst-case approach has been taken when assessing the carbon avoidance from Solar PV generation. It is considered that the electricity generation and carbon avoidance figures have been presented to be conservative.

In policy terms, Battery Energy Storage Systems is recognised as a type of infrastructure that is directly related to renewable energy generation in NPS EN-1 and also in paragraph 161 and 168 of the NPPF. BESS is needed to maximise the use of renewables when there is an abundance of generation, and to fill the supply gaps in periods of shortfall. As such, as stated at paragraph 36 of the ES Chapter, the assessment of carbon avoidance from the BESS is calculated with the knowledge that the stored electricity from the BESS will be used at times of peak demand. This is based on an assumption that the BESS (within Work no. 5a) will have an export capacity of 440 MW and be able to sustain this for two hours, thus having a total energy storage capacity of 880 MWh.

Summary Position of Interested Party

Applicant's Responses

JPAG

Staythorpe Power Station is an existing, and operational land use. So the assessment presented in the ES assumes this as part of the existing baseline. The Development is not connected to Staythorpe Power Station in any way other than that they both connect to the national electrical grid at the National Grid Staythorpe Substation. The Development and Staythorpe Power Station will not affect each other in any way. Emissions of substances to air and water from Staythorpe Power Station are implicitly considered in the EIA as part of the baseline to which the Development is proposed to be added.

The Applicant's approach to the assessment of the climate effects of the Development is based on reasonable assumptions and is proportionate.

At paragraph 56, JPAG sought clarity on how the Staythorpe BESS has been incorporated into the Order Limits. It is accepted that has been granted planning permission on appeal, but is not shown as part of the GNR project yet it is included in the Order Limits boundary and as Elements Green now own the company that obtained the planning permission it will inevitably form part of the overall GNR project.

ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048] set out the Works Areas within the Order Limit, with supporting figures in **ES Volume 3, Figure 5.1: Works Areas [EN010162/APP/6.3.5B]**,

Staythorpe BESS falls under Work no. 7: Consented Staythorpe BESS and Connection as defined by Schedule 1 of the **Draft DCO [EN010162/APP/3.1B]**. Section 5,4,2,38 of **ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048]** sets out that modification works would be required at the operational Staythorpe BESS installation.

Summary Position of Interested Party

Applicant's Responses

JPAG

Health, Safety and Security

From paragraphs 51 to 55, JPAG raised concerns about the impacts on health and wellbeing and sought justification of the impacts. Battery malfunction should be assessed and be scoped into the ES under the heading of Public Health. The GNR proposal has given rise to stress in the local community arising from concern over the massive industrial scale of the proposal; the inclusion of BESS aspects; the lack of information and incorrect information contained in the Phase Two statutory consultation documents; the incidents that have taken place involving BESS; the suggested impact of vibration and noise; likely damage resulting from HGVs; inevitable pedestrian and vehicular conflict including in areas where past conflict has resulted in fatalities; the circular enveloping nature of the Order Limits; and the likelihood of increased surface water run-off from slopes in excess of 6% into river catchments that have a recent severe impact of flooding homes and businesses.

The Applicant noted that JPAG raised concerns over impact on health and wellbeing as a result of the scale of the development, circular nature of the Development, misleading consultation, BESS, noise impact, highway safety and flood risk.

Potential effects in relation to human health, fire risk, safety and security have been assessed and appropriate measures have been provided to promote improvements to encourage health and wellbeing.

Section 16.4 of the **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16]** [\[APP-059\]](#) sets out the Human Health Impact Assessment (HHIA), which has considered the interrelationships of impacts informed by the wider effects from landscape and visual, flood risk, noise, and highway safety.

Section 16.5 of **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16]** [\[APP-059\]](#) has also considered the potential impacts from BESS fire.

ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [\[APP-056\]](#) sets out the recreation and tourism enhancements which would support health and wellbeing; and through the **ES Volume 4, Appendix A5.3: oCEMP [EN010162/APP/6.4.5.3A]**, **ES Volume 4, Appendix A5.4: oFSMP [EN010162/APP/6.4.5.4A]**, **ES Volume 4, Appendix A5.5: oOEMP [EN010162/APP/6.4.5.5A]**, **ES Volume 4, Appendix A5.6: oDRP [EN010162/APP/6.4.5.6A]** and the creation of employments and

Summary Position of Interested Party

Applicant's Responses

JPAG

new permissive path, the Development could mitigate indirect impacts on health and wellbeing, including impacts on those who already suffer poor health or are socially excluded, such that there would no significant adverse effects to human health and well-being.

Principle of Development

From paragraphs 80 to 95, JPAG raised concerns that the scale of GNR is disproportionate to the Main Settlements in Newark & Sherwood and to other NSP Solar Projects.

ES Chapter 4: Alternatives [EN010162/APP/6.2.4]] [APP-047] and the **Design Approach Document [EN010162/APP/5.6A]** identified key design considerations that were fundamental to the scale of the Order limits and PV arrays. As stated at paragraph 6.4.1 of the **Planning Statement [EN010162/APP/5.4A]**, 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 enhancements, where practicable.

In this sense, its generating capacity and scale would in principle, be reasonable. It is considered that the Development has sought to maximise energy generation whilst minimising impacts as far as possible.

Summary Position of Interested Party

Applicant's Responses

JPAG

From paragraphs 95 to 98, JPAG raised that the circular nature of the GNR project represents an unusual and potentially unique set of circumstances where impacts can be felt on local communities in all directions. JPAG considered that the zones of influence used for assessing impacts should include all of the 18,119.8 hectares over which the Development extends across, with the buffer then applying to the outer edge of the circle formed by the Order Limits.

The Applicant's approach to the Zone of Influence for each environment set out in Section 2.3.8.1 of the **ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA)** [EN010162/APP/6.2.2] [APP-045]. The Zone of Influence (ZOI) for each environmental aspect was identified by the relevant experts in the EIA team, in accordance with industry best practice.

From paragraphs 99 to 105, as well as from paragraphs 123 to 132, JPAG raised concerns that no cogent or substantive evidence is provided to support the contention that alternative technologies have actually been considered as alternatives. This includes considering carbon capture and storage technology or Small Modular Reactors.

The Applicant considers that the alternatives for design and locations have been adequately assessed, as presented in **ES Volume 2, Chapter 4: Alternatives** [EN010162/APP/6.2.4] [APP-047].

No consideration of reasonable alternatives to the potential generation of electricity. There has been no consideration of options of splitting the development into smaller projects; neither has there been any consideration of a project that generates a lower level of electricity output.

An iterative design process has been employed to optimise the Development layout since 2023 and the proposed layout in the EIA Scoping Report has been refined to avoid high value agricultural land and avoid any landscape designated area. Section 4.4 (Design Evolution) of the **ES Volume 2, Chapter 4: Alternatives** [EN010162/APP/6.2.4] [APP-047] sets out details for a number of changes were made to the layout of the Development in response to the feedback from the EIA scoping, non-statutory consultation, statutory consultation and ongoing engagement with the local residents. The main changes of the layout following the statutory consultation including a reduction in solar area overall as a result of increases in solar panel efficiency (meaning the same electricity could be generated from less land than was previously the case).

There has also been no explanation as to other land that has been considered and has been discounted as being unacceptable with the full reasoning given for discounting such land. JPAG raised, in particular, that there is no evidence in the site selection approach to demonstrate that options to avoid BMV land, areas with flood risk, and impacts on residential amenity have been duly considered.

Section 4.3.1 of the **ES Volume 2, Chapter 4: Alternatives** [EN010162/APP/6.2.4] [APP-047] sets out the systematic approach

Summary Position of Interested Party

Applicant's Responses

JPAG

From paragraphs 123 to 129, JPAG also raised concerns about the area of search based on a 15 km radius of Staythorpe substation and the rationale for the site search radius, as well as noting that the maps in the Design Approach Documents are highly confusing and misleading.

to the area of search. The 15km radius is considered to be a reasonable study area from the grid connection distance for a solar project of this scale.

In regard to the consideration of alternative technologies, both NPS EN-1 and EN-3 clearly establish the need for the solar development, and this need of the Development has been set out in the **Statement of Need [EN010162/APP/7.2]** [\[APP-324\]](#). Considering alternative technologies and design such as SMR or splitting the Development into small projects is not a relevant policy requirement. Policy requirements for alternatives are in relation to flood risk, BMV land, compulsory acquisition, and habitat sites, all of which are considered separately in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4]** [\[APP-047\]](#).

As such, **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4]** [\[APP-047\]](#) confirms that reasonable alternatives have been studied. The Development has been adequately considered to minimise impacts balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. The **Planning Statement [EN010162/APP/5.4A]** then concludes that the Development complies with the policy tests for good design.

From paragraphs 106 to 111, JPAG requested evidence to support how the project could be operational by 2029, and sought clarity on how the delay in reinforcement of the third Super Grid Transformers at Staythorpe could impact the deliverability and operational timing on GNR.

The Applicant has secured and accepted a Grid Connection Offer from NESO at the Staythorpe Substation to connect the Development that to the National electricity Transmission System (NETS) with a connection date of 2027, which supports the Applicant's position that the Development can be delivered at pace,

Summary Position of Interested Party

Applicant's Responses

JPAG

and help meet the urgent need identified in Clean Power 2030. Further details are provided in the **Grid Connection Statement [EN010162/APP/7.15A]**.

From paragraphs 130 to 140, JPAG raised some queries about the constraining factors for site selection:

JPAG sought clarity on why the Design Approach Document only indicates flood zones 2 and 3 as 'best avoided' rather than 'not suitable for development'.

in terms of Agricultural Land Classification (ALC), ALC Grade 1 only identified as 'best avoided', with ALC Grade 2 only identified as 'not preferred' with nothing listed for ALC Grade 3a. This doesn't reflect the fact that Grades 1, 2 and 3a all collectively comprise the best and most versatile land. JPAG sought clarity on why treating Grades 1,2 and 3a land differently in site selection.

JPAG sought to clarify the degree to which the Residential Amenity Assessment has played a part in the original site selection process.

In the Design Approach Document, mineral safeguarded areas are listed as 'not preferred' but they don't appear to have influenced the shading shown on Figure 5: Land Use Considerations.

The Applicant noted that JPAG requested for further clarification on the site selection approach in relation to flood risk, ALC land, residential amenity and mineral safeguarding.

There is no policy requirement which prohibits development to be located in areas with flood risk. NPS EN-1 paragraph 5.8.21 confirms that development should only be necessary in flood risk areas in the exception, for example where there are no reasonably available sites in areas at lower risk. Therefore, the Design Approach Document only indicates flood zones 2 and 3 as 'best avoided' rather than 'not suitable for development'.

The ALC map published by the Ministry of Agriculture, Fisheries and Food (MAFF) is the only mapping available that shows land quality expectations. This methodology was devised by the Ministry of Agriculture, Fisheries and Food (MAFF) in the 1970s, and the ALC maps have not been updated since then. They are therefore considered provisional, identifying the prevailing ALC distribution. As a result, the outdated ALC map shows the Order Limits as mostly undifferentiated Grade 3.

As stated at paragraph 54 of **ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17]** [\[APP-060\]](#), the map is not sufficiently accurate for assessing individual fields or

Summary Position of Interested Party

Applicant's Responses

JPAG

development sites and should only be used as general guidance, as advised in Natural England's TIN049.

To provide accurate information, the Applicant has undertaken a detailed ALC survey within **ES Volume 4, Appendix A17.1: Agricultural Land Classification Survey [EN010162/APP/6.4.17.1] [APP-288] [APP-289]**. This survey reflects the current situation by identifying Grades 1, 2, and 3a. Therefore, the Applicant has considered Grades 1, 2, 3a, and 3b land in the site selection process.

In relation to the degree to which 'Residential Amenity Assessment' has been taken into account in the site selection, the Applicant notes that this appears to relate to the Residential Visual Amenity Assessment (6.2.7.6 – Technical Appendix A7.6 – Residential Visual Amenity Assessment). The RVAA process can only start after the magnitude and significance of visual effects is known. That would inevitably be after land has been identified. Areas within 50m of residential properties were avoided and areas within 100m of dwelling or housing allocated were only used where there is effective screening of visibility. This measure mitigated effects on residential visual amenity and the visual amenity of existing and potential areas of settlement. The site is set back from villages, with limited visual and glint and glare impact on residential properties. The Applicant consulted with affected residents and adjusted the design to reduce visual impacts. An RVAA (Residential Visual Amenity Assessment) then confirmed no properties would experience effects approaching or exceeding the RVA threshold. Once mitigation has been taken into account there would be no

Summary Position of Interested Party

Applicant's Responses

JPAG

unacceptable glint and glare effects on properties. This approach is wholly consistent with the criteria set out in paragraph 2.10.27 of NPS EN-3.

In relation to mineral safeguarding, the relevant policy requirement in relation to mineral safeguarding is provided at paragraph 5.11.19 and paragraph 5.11.28 of NPS EN-1, which require Applicants to safeguard any mineral resources on the site as far as possible, and to provide appropriate mitigation measures where a proposed development has an impact upon a Mineral Safeguarding Area.

ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10] [APP-053], with supporting documents in **ES Volume 4, Appendix A10.9: Mineral Resource Assessment [EN010162/APP/6.4.10.9] [APP-238]** which considered the effect of the Development on Mineral Safeguarding Areas and has concluded that the safeguarded mineral resources would not be permanently sterilised by the Development given its temporary nature and the safeguarded resource would subsequently be available for extraction at some point in the future. The regional minerals officer has concurred with the conclusions of the MRA.

Landscape and Visual

From paragraphs 112 to 122, JPAG disagreed with the description of the development in the Landscape and Visual Impact Assessment, suggesting that it takes an incorrect starting point to

The description being referred to appears at paragraph 74 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** as part of a general description of the landscape of the site and study area. It

Summary Position of Interested Party

Applicant's Responses

JPAG

the character of the area by describing existing infrastructure as having an urbanising influence.

JPAG were concerned that such large-scale infrastructure would have an industrialisation impact on the landscape, including impacts on the Mid-Nottinghamshire Farmlands and Trent Washlands Regional Character Areas.

Therefore, JPAG submitted that the site selection is not adequately justified and the avoidance of developing in the Landscape Character Areas have not been sufficiently proven.

describes the study area as predominantly rural (paragraph 73) with some influence (described as 'more urbanising' – i.e. less rural) from the transport corridors and power station to the east and south. The description is not intended as 'justification' for the development – which is not the function of an LVIA.

Effects on the Mid-Nottinghamshire Farmlands and its constituent character types are assessed in section 7.7.9 of the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA)** [EN010162/APP/6.2.7] [APP-050] and A7.5.2 of **ES Volume 4, Appendix A7.5: Non-Significant Effects** [EN010162/APP/6.4.7.2] [APP-212] and noted in the relevant representation.

As explained at the rows above under the section of 'Principle of Development', the approach to site selection has been set out in detail in **ES Volume 2, Chapter 4: Alternatives** [EN010162/APP/6.2.4] [APP-047] and the **Planning Statement** [EN010162/APP/5.4A] then concludes that the Development complies with the policy tests for site selection and good design with the consideration of alternatives in relation to flood risk, BMV land, compulsory acquisition, and habitat sites.

JPAG raised cumulative concerns, suggesting the need to include the proposed Barnby in the Willows Solar proposal and the Grassthorpe Beck Solar as part of the cumulative assessment. Full extent of the quarries, namely Kirton Quarry and brickworks; Cromwell Quarry, as well as existing solar farms at Eganton and Bilsthorpe (x3) are not shown on Figure A2.1.1a.

A full list of cumulative developments to be considered at Stage 1 and 2 of the assessment is presented in **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2** [EN010162/APP/6.4.2.1A]. This sets out the assessment of sites for potential inclusion in the cumulative effects assessment. The approach has been prepared in accordance with PINS guidance on

Summary Position of Interested Party

Applicant's Responses

JPAG

cumulative effects assessment¹¹. This includes all relevant solar schemes that have met the criteria set by PINS. This list was confirmed in April 2025 and the Applicant has committed to monitor relevant schemes throughout the Examination stage.

The Applicant notes that some of the suggested schemes that have been assigned a lower level of certainty and have therefore not been considered further at Stages 3 and 4 of the assessment. Only the shortlisted developments included in the cumulative effects assessment are shown on Figure A2.1.1 in **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]**.

Cumulative landscape and visual effects with existing and consented developments, as well as other proposals in planning or at earlier stages are considered in the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]**. Section 7.10.7 of the ES recognises that landscape and visual cumulative effects will predominantly arise from the SSE BESS to the west of Averham, and One Earth, Kelham and Foxholes solar farms. **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]** concludes that some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are

¹¹ Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment, <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>, accessed: December 2025. Last updated on 25th March 2025

Summary Position of Interested Party

Applicant's Responses

JPAG

considered in Section 7.9 with no new significant effects being identified.

The Applicant has not identified any Planning application for a solar farm at Barnaby Willows and so there are no confirmed details on what such a scheme would be, and what planning status it would have.

Grassthorpe Beck Solar is on land west of Grassthorpe Lane, Weston, Nottinghamshire, NG23 6SU. As of November 2025, this scheme appears to be in the pre-application process and no application has been published by the LPA. It therefore does not yet meet the criteria for cumulative assessment.

Cemex Cromwell (ID292, application reference F/4395), was granted planning permission in 2023, has been included in the cumulative effects assessment, and was included in Stage 3 and 4 of the assessment and it is shown on Figure A2.1.1.

Egmanton Solar Farm (14/00975/FULM) and Bilsthorpe Business Park (12/01594/FULM) were granted planning permission before prior to 2022 and the Applicant has assumed these schemes are in place and form part of the baseline.

are therefore not included on cumulative list in the **ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A]**. They have been considered in the baseline of the ES assessment, and the effects of the Development take these schemes into account.

Summary Position of Interested Party

Applicant's Responses

JPAG

Ground Conditions

The amendments to the project have reduced the impact on the sand and gravel resource which is welcomed. However, the cumulative impact with the existing, permitted and allocated quarries has not been considered. The three quarries of Cromwell, Langford Lowfields and Besthorpe form a very large cluster of mineral extraction activity that covers an area of approximately 6km by 3km, an area of over 800 hectares that straddles the River Trent between North Muskham and Sutton on Trent. Girton quarry covers a further 100 hectares a short distance further north in the River Trent valley. JPAG suggested that Figure A10.9.1 in the Technical Appendix doesn't show the permitted southern and northern extensions of Cromwell Quarry.

The three sand and gravel quarries to the east of the Development have been considered in **ES Volume 4, Appendix A10.9: Mineral Resource Assessment [EN010162/APP/6.4.10.9]** [[APP-238](#)].

The assessment of cumulative effects on the ground condition is set out in Section 10.8 of **ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10]** [[APP-053](#)]. The Zone of Influence (ZOI) for ground conditions and land contamination has been identified based on the spatial extent of likely effects. The search buffer is up to 250 m around each Study Area. It is not considered that the Development would contribute to any significant adverse cumulative effects in relation to ground conditions and contamination and no mitigation measures are required for managing cumulative effects. The three quarries have not been considered in the cumulative assessment in the ES chapter because the projects are located beyond the ZOI.

The Applicant notes that Nottinghamshire County Council agree with the conclusions of the assessment undertaken and does not have any outstanding concerns relating to minerals.

Land Use

JPAG raised concerns that areas for mitigation and enhancement once established are unlikely to be removed at the time of decommissioning. This will result in the permanent sterilisation of sand and gravel mineral resources and has the potential to reduce

ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10] [[APP-053](#)] is based on a worst-case scenario as described in Section 5.7 of the **ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5]**

Summary Position of Interested Party

Applicant's Responses

JPAG

the areas that may be available in the future for consideration for mineral extraction. This may increase the pressure in the future for the Council to need to reconsider sites put forward previously at Great North Road (North) and Great North Road (South) which would further concentrate industrial activity in the area adjacent to Staythorpe, Averham and Kelham.

[\[APP-048\]](#). It assumes that woodland and hedgerows (except those created to form a second hedge alongside a permissive route) will be retained, as will the community orchard.

Section 10.7.3 of the **ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10]** [\[APP-053\]](#) concludes that the decommissioning effect will be of negligible or minor adverse significance, which is not considered significant in EIA terms.

Flood Risks, Drainage and Water

It is noted that the revisions to the layout have been positive from the perspective of flooding. Although areas of mitigation/enhancement are still located within flood zones 2 and 3, as are some areas of cable trenches. The submitted FRA accepts that the National Grid Substation lies within the flood zones as does the Staythorpe BESS which is already consented. Whilst it is accepted that any connection to the Staythorpe Grid Connection Point would necessitate additional infrastructure in the area of flood risk. Nevertheless, there has been no sequential test undertaken of connecting to the grid at an alternative location. Other grid connections in the area such as at High Marnham for example are not at risk of flooding.

Pluvial flooding for all aspects of the Development is assessed in Section **A9.1.2.3 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]** and concludes that the risk of pluvial flooding is Low to Negligible, including PV arrays which are raised above ground level.

Regarding the statement on sequential test, there is no other substation that would have the necessary capacity for the Development. The Applicant therefore disagrees that the sequential test would require the applicant to consider alternative grid connections.

Summary Position of Interested Party

Applicant's Responses

JPAG

JPAG were concerned about the flood risk in Moorhouse Beck and in the southern part of Kelham Hills, where the BESS will be located. Hydraulic modelling is recommended to assess the impact of surface water run-off, especially in areas with steeper slopes and vulnerable watercourses.

It is acknowledged that Moorhouse has previously flooded and the Solar PV was removed from Flood Zones 2 and 3 prior to submission.

As shown in Plate 9.2 of **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]**, 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]**, 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.

4 RELEVANT REPRESENTATIONS - THEMATIC ISSUES

4.1 OVERVIEW

4.1.1 Relevant Representations that have been submitted by IPs not included above have been arranged by topics raised within the Relevant Representations 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.

4.1.2 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.

4.1.3 Responses have been prepared for the following themes:

- Battery Energy Storage Systems;
- Ecology and Biodiversity;
- Cultural heritage and Archaeology;
- Flood Risk, Drainage and Water;
- General;
- Ground Conditions;
- 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;
- Traffic and Access

4.2 BATTERY ENERGY STORAGE SYSTEMS (BESS)

4.2.1 This section addresses the issues raised in the RRs in relation to the design of battery energy storage systems and the impacts from BESS.

Table 4-1 Battery Energy Storage Systems (BESS)

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-042 RR-085 RR-097 RR-136 RR-193	<p>Battery Safety: Concerns raised about the risk of fire from the BESS and the potential effects of the Development on the residents and on local wildlife.</p>	<p>ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] specifies the use of lithium iron phosphate cells in the BESS, which are generally considered safer and less prone to thermal runaway and explosion than other lithium-ion battery technologies. The Development incorporates various fire and explosion prevention and mitigation measures, in adherence with relevant international and British standards and guidelines, including NFPA 855, UL 9540, FM Global Datasheet 5-33, Allianz Global Risk Consulting, EASE BESS Safety Best Practices Guideline, NFCC guidance and the Fire Safety Order, where applicable. The Development will use equipment that is in compliance with UL 9540 (or IEC 62619) certification and has been demonstrated to meet UL 9540A testing requirements to evidence that fire will not spread to adjacent containers.</p> <p>The site design incorporates various fire prevention and mitigation measures, including adequate separations and access (in accordance with NFPA 855), in conjunction with an advanced multi-layered fire safety control system prioritising early detection, suppression, ventilation, electrical protection and alarms. The approach taken is to in the first instance prioritise the prevention of an emergency event, and if not possible, to reduce the likelihood of an event happening to as low as reasonably practicable. The Development includes the provision of water supply, to cool surrounding areas to further prevent the likelihood of fire spread.</p> <p>ES Volume 4, Appendix A5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] includes a risk assessment, which identifies hazards at the Development and details the prevention and mitigation strategies used to</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>reduce the risk present to the Development itself, the surrounding environment, emergency responders and the general public.</p> <p>Additionally NFPA 855 requires large-scale fire testing (LSFT) for BESS technologies at the installation level to assess their fire performance hazard and effects on surrounding exposed surfaces. The Development also does not have occupied buildings within a 30.5 meter radius, which is the recommended distance for evacuating such buildings in the event of a compromised BESS.</p> <p>Battery safety is identified as one of the major accidents or disasters in section 16.5 of ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059]. The assessment concludes that in combination with the appropriate BESS design and mitigation measures set out in the ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A], no significant risk associated with a potential fire in a battery unit is likely.</p> <p>The Applicant notes that the BESS design is currently under discussion with Newark and Sherwood Council, Nottinghamshire Fire and Rescue Service and the Environment Agency.</p> <p>The BESS layout and siting has been designed to minimise fire risk and the design information about BESS is set out in in Concept Design Parameters and Principles [EN010162/APP/7.14A] and in Design Approach Document [EN010162/APP/5.6A] As shown in ES Volume 3, Figure 5.1: Works Areas [EN010162/APP/6.3.5B], the proposed BESS unit is approximately 550 m northeast, at its closest point, from the nearest sensitive receptors, which are residential properties at Flash Farm. The next nearest are properties in Kelham, approximately 750 m northeast of the BESS. The BESS is located outside of any environmentally sensitive areas. The BESS has therefore been sited in a suitable location.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] has been prepared based on the approved FSMP for the Staythorpe BESS project. It secures a number of key measures including:</p> <ul style="list-style-type: none"> • A requirement to provide a 3 m spacing between battery containers, • Two emergency access points that approach the compound from different directions • Onsite water provision of 228 m3 and cooling surrounding areas rather than containers to reduce the risk of creating contaminative fire water <p>Requirement 7 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that prior to the commencement of Work No.5A a FSMP must be submitted to and approved by Newark and Sherwood Council in consultation with Nottinghamshire Fire and Rescue Service and the Environment Agency. This must be in accordance with the ES Volume 4, Appendix 5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] and must be implemented as approved.</p>
<p>RR-032 RR-136</p>	<p>Scale of BESS: Respondents sought to understand the electricity generation capacity to handle the electricity output from existing and under-construction schemes. Respondents questioned that the unchanged generation target despite reduced panel acreage suggests excessive land use.</p>	<p>As stated in Technical Guide for Solar [EN010162/APP/7.16] [APP-XX], the capacity of a solar generation system is commonly expressed in megawatts peak (MWp). This figure represents the theoretical maximum power output a system can deliver under ideal conditions (midday, overhead sun with no cloud cover). The Technical Guide for Solar [EN010162/APP/7.16] [APP-XX], also states that co-locating a BESS site with a solar park offers operators and the grid valuable flexibility, enabling the export of electricity immediately, storage of energy for later release, or dynamically split output between export and storage based on demand. This flexibility is particularly beneficial providing necessary system balancing services to support the grid.</p> <p>Such grid services include the Capacity Market, where generators are paid to be available during demand periods to guarantee sufficient energy supply to meet peak energy requirements, Frequency Response Services which assists the grid</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>with maintaining its safe operational limits for frequency stability, and the Balancing Mechanism, a real-time tool used to resolve short-term supply and demand mismatches.</p> <p>As per the Statement of Need [EN010162/APP/7.2] [APP-324], the maximum export capacity at the grid connection point is 800MW (AC), however the Development has been sized to generate 1120MWp, as energy generation for solar projects fluctuate throughout the day, depending on various environmental factors. BESS projects allow for the capture of surplus energy, leading to a steady and controlled supply of energy to the grid. The BESS is sited to provide operational efficiency and will be designed to work in conjunction with the solar generation. While the final construction details of the BESS are yet to be finalised, the final design will adhere to the maximum design parameters outlined in Table 5.9 – BESS Design Parameters of ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048], and in accordance with the ES Volume 4, Appendix A5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A].</p> <p>The BESS is sized to deliver grid services to support the safe operation of the grid and financial returns to ensure the Development is viable. The BESS is also designed to match the forecasted output of the Development, which typically ranges from 25-75% of the peak PV power, to guarantee dispatchable output.</p> <p>As stated in Statement of Need [EN010162/APP/7.2] [APP-324], the need for BESS is clearly outlined in both relevant National Policy Statements; and the co-location of storage with solar generation, as proposed for the Project, is explicitly supported by NPS EN-3 and by the ambitions to achieve Clean Power by 2030. The Applicant considers that the scale of BESS is appropriate.</p>
RR-172	<p>Noise and Light Impact: Respondent sought to understand more about the noise and light</p>	<p>An assessment of the impact of operational noise is provided in ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055], with supporting information provided in ES Volume 4, Appendix 12.2: Noise and</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
	<p>impacts from the BESS (and inverter units),</p>	<p>Vibration Modelling [EN010162/APP/6.4.12.2] [APP-271]. The assessment considers noise from solar array inverters, inverters and transformers within substations, as well as noise from the BESS battery containers and inverters. Based on a worst-case scenario, assuming all plant is operational simultaneously at 100% capacity, the assessment concludes that no significant effects are anticipated.</p> <p>Requirement 15 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that no part of work numbers 1, 4, 5A, 5B, 6 or 7 may commence until an operational noise assessment containing details of how the design of the authorised development has incorporated mitigation to ensure the operational noise rating limits as set out in the environmental statement are to be complied with for the relevant work number has been submitted to and approved by Newark and Sherwood District Council.</p> <p>Section A5.3.4 of the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A] sets out the control measures that would be in place for the use of lighting during the construction phase which are in line with good practice to avoid light pollution effects. Construction lighting will be agreed with NSDC as part of the detailed CEMP(s) (production and approval of which is secured through Requirement 12 in Schedule 2 of the Draft Development Consent Order [EN010162/APP/3.1B] prevents any phase of the Development commencing until a CEMP for that phase has been submitted to and approved by NSDC. Each CEMP must be prepared in accordance with the aforementioned Outline CEMP. Concept Design Parameters and Principles [EN010162/APP/7.14A] state that operational lighting will be limited for emergency and overnight maintenance purposes only at inverter stations, or transformer stations and will be directed within the Order limits. The Development is therefore not expected to create significant adverse effects from light pollution.</p>

4.3 ECOLOGY AND BIODIVERSITY

4.3.1 This section addresses issues raised in the RRs in relation to the effects of the Development on the habitats and species, as well as the designated sites and ecological process that support them.

Table 4-2 Ecology and Biodiversity

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-001 RR-005 RR-007 RR-043 RR-044 RR-049 RR-067 RR-069 RR-075 RR-081 RR-084 RR-088 RR-098 RR-100 RR-112 RR-116 RR-117	<p>Wildlife Impact and Habitat Loss: Concerns raised about how the Development and the fencing around solar farms will lead to habitat fragmentation and habitat loss, resulting in an irreversible harm for wildlife. Livestock farmers were concerned about Bovine Tuberculosis and the displacement of potentially disease carrying animals as a result of the Development.</p>	<p>An assessment of the effects of the Development on ecology and biodiversity is provided in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051], with supporting information provided in ES Volume 4, Appendix 8.1–14 [EN010162/APP/6.4.8.1–14]. The assessment concludes that with appropriate mitigation measures which are secured, the Development will have no significant adverse effects on ecology and biodiversity, and will have some significant beneficial effects.</p> <p>The Applicant also notes that the approach to biodiversity and wildlife mitigation is under discussion with NCC, NSDC, NE and EA and the discussions are set out within the respective Statement of Common Grounds:</p> <ul style="list-style-type: none"> • 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] <p>The Development design has been developed to help avoid and reduce potential adverse effects on the biodiversity and ecology during construction and operation</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-121 RR-125 RR-140 RR-148 RR-151 RR-159 RR-178 RR-194 RR-201 RR-208 RR-211 RR-212 AS-062 AS-067 AS-069 AS-072 AS-075 AS-076		<p>as set out in Section 8.6 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051].</p> <p>Section A5.1.1.2 of ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1A] notes that a Vegetation Clearance Phasing Plan will be provided to set out the location and timing of vegetation removal so that ecological effects are minimised (e.g., reducing clearances during the bird nesting season), habitat creation is optimised (e.g., tree planting in winter), and critical paths during construction are not compromised. Section A5.1.6 of the ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1A] provides prescriptions for the implementation, management, monitoring and remediation of the range of proposed terrestrial habitats.</p> <p>Extensive biodiversity and landscape mitigation have been proposed including 555 ha dedicated solely to these purposes and which will contribute to securing biodiversity net gains for habitats hedgerows and watercourses. There will be an increase of 31 ha of broadleaved woodland (excluding other trees and woodland types), 50 km of species-rich hedgerows, and the creation of two new ponds and several scrapes, as well as an increase in watercourse quality and habitat connectivity. This is set out in ES Volume 4, Appendix 8.13: BNG Assessment [EN010162/APP/6.4.8.13] [APP-226] and is outlined in ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] secures an extensive biodiversity and landscape mitigation proposal and biodiversity net gain.</p> <p>Requirement 8 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] 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 accordance with ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1A] and must be implemented as approved. The landscape and ecological management plan must include details of the extent to which the</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>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.</p>
<p>RR-053 RR-087 RR-149 RR-196 RR-206 RR-214 AS-055</p>	<p>Construction Effects: Concerns raised about the construction impact of the Development on the wildlife habitat and the wildlife movement.</p>	<p>ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] concludes that there will be no significant adverse effects designated sites, habitats and animal species during construction. Adverse effects have been avoided or reduced through the sensitive design and embedded mitigation described in section 8.6 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]. Additional mitigation is secured in ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A].</p> <p>Measures include the extensive use of HDD, the establishment of exclusion buffers, and the establishment of compensatory habitats before and during construction.</p> <p>Requirement 12 in Schedule 2 to Draft DCO [EN010162/APP/3.1B] secures the detailed construction environmental management plan for each phase, which must be submitted to and approved by Newark and Sherwood District Council. This must be prepared in accordance with the ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A].</p>
<p>RR-049 RR-085 RR-147 AS-055</p>	<p>Protected Species: Concerns raised about the potential impact of the Development on species such as great crested newt, water vole,</p>	<p>ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] includes an assessment of the potential impacts on ecology and biodiversity which includes a range of notable and protected species, such as white-clawed crayfish, great crested newt, grass snake, water vole, otter, badger, bats, breeding birds, and wintering birds. Table 8.12 summarises the likely effects</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
	<p>otter, badger, bats, brown hare, breeding birds, and wintering birds.</p>	<p>on important ecological features during the construction, operation and decommissioning phases. The assessment concludes that with appropriate avoidance measures which are secured, the Development would not result in significant adverse effects on species.</p> <p>Measures to avoid or reduce the risk of adverse environmental effects during construction, operation and decommissioning are secured in the following management plans:</p> <ul style="list-style-type: none"> • ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A] • ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] • ES Volume 4, Appendix 5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A] • ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]
<p>RR-006 RR-012 RR-022 RR-026 RR-066 RR-108 RR-218</p>	<p>Birds: Concerns raised about the impact of the Development and panels on a range of bird species, including skylark, yellowhammer, buzzards, heron, kestrel, barn owl, peewits kingfisher, robins, blackbirds and red kites.</p>	<p>A detailed assessment of the effects of the Development on birds is provided in Sections 8.8.15 and 8.8.16 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]. The conclusion of the assessment is summarised below:</p> <ul style="list-style-type: none"> • Construction phase: With the mitigation measures secured, the effects of disturbance and habitat loss will be localised and temporary during construction. As such, no significant adverse effects on the breeding birds are predicted. • Operation phase: With the open farmland assemblage mitigation strategy as summarised in Table 8.10, the Development will provide extensive grassland under the PV panels (999 ha), new and retained diverse grassland habitats 407 ha), and arable land (144 ha) with a high degree of conservation management for birds. The effects on the skylark population

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>will be beneficial at the Site level, which is not significant in EIA terms. The effects on the remainder of the breeding bird assemblage will be beneficial and significant at the Local scale.</p> <ul style="list-style-type: none"> Decommissioning: Many habitats and environmental conditions that have improved over the operational period to benefit breeding birds will be returned to their baseline conditions which will represent a neutral effect. As such, no significant effects are predicted. <p>ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1A] includes the open farmland assemblage mitigation strategy. The construction, operation and decommissioning works will be controlled by ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A], ES Volume 4, Appendix 5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A] and ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]</p>
<p>RR-014 RR-075 RR-078 RR-146 RR-201</p>	<p>Biodiversity Net Gain: Respondents sought to understand the rationale of the BNG target and questioned whether the proposed target could compensate for habitat loss. Concerns raised that the Nottinghamshire Local Nature Recovery Strategy was undermined and ignored in the Development.</p>	<p>The approach to the BNG is informed by the Draft Local Nature Recovery Strategy (LNRS) for Nottinghamshire and the Newark and Sherwood District Council Mandatory Biodiversity Net Gain Strategic Significance guidance. Full approach is detailed in Section A8.13.1.2 of the ES Volume 4, Appendix 8.13: BNG Assessment [EN010162/APP/6.4.8.13] [APP-226].</p> <p>Extensive 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. There will be an increase of 31 ha of broadleaved woodland (excluding other trees and woodland types), 50 km of species-rich hedgerows, and the creation of two new ponds and several scrapes, as well as an increase in watercourse quality and habitat connectivity. Alongside the BNG, biodiversity and landscape mitigation and enhancement is also secured in ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1A]. Section 8.8.8 of the ES Volume 2, Chapter 8:</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051], which also (in section A5.1.3.2) references the LNRS.</p>
<p>RR-061 RR-033 RR-206 AS-055</p>	<p>Habitat Management: Concerns raised about how the screening effect would be minimal during the early stages of the development. Respondents sought clarity on the long-term maintenance of the proposed trees, hedgerows and watercourses..</p>	<p>ES Volume 4, Appendix 5.1: Outline LEMP [EN010162/APP/6.4.5.1A] secures an extensive biodiversity and landscape mitigation and enhancement proposal and biodiversity net gain. It also outlines how the mitigation and enhancement identified will be implemented and subsequently maintained and monitored to ensure its effectiveness. Monitoring will include a feedback loop to ensure that if mitigation is not delivering the desired aims, then remedial management will occur.</p>
<p>RR-078</p>	<p>Cumulative Impact on Biodiversity: Concerns about cumulative impacts on biodiversity</p>	<p>An assessment of the cumulative effects of the Development on ecology and biodiversity is provided in Section 8.9 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051], with supporting information provided in ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045]. The Development will not contribute to cumulative adverse effects on designated sites, habitats and species. No significant cumulative effects are predicted.</p>
<p>RR-078</p>	<p>Assessment Methodology: Concerns raised that the ecological baseline relies on surveys that are not transparently proven to cover all necessary seasons and receptor types.</p>	<p>A range of baseline studies has been undertaken by suitably qualified, professional ecologists, following good practice methods, to establish the status and distribution of habitats and notable and protected species within and around the Order Limits and these are presented in ES Volume 4, Appendix A8.1–12 [EN010162/APP/6.4.8.1–12]. The assessment methodology is set out in Section 8.4 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] and the assessment method follows the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment (EcIA). Potential limitations and assumptions are presented in section 8.5.1 of chapter 8. The Applicant considers the baseline studies are robust and appropriate. The Applicant also notes that the</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>assessment methodology approach to biodiversity and wildlife mitigation is under discussion with NCC and NSDC and the discussions are set out in:</p> <ul style="list-style-type: none"> • 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]
RR-186	<p>Water Quality: Concerns raised that the Development could impact the water quality and affect the livestock in the small lake owned by the relevant representative.</p>	<p>An assessment of the effects of the Development on watercourses and waterbodies is provided in ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051]. The assessment identifies 46 km of watercourse and ditch habitats and concludes that with appropriate mitigation measures, the Development would result no significant adverse effect on the watercourses and waterbodies.</p> <p>Potential effects on watercourses and waterbodies have been greatly reduced by including 10 m exclusion buffers into the Development design and 5 m buffers for artificial field drains. Anticipated watercourse crossings are described in Section A5.3.13 of the ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A]. There will be no other works within or above the watercourse channels.</p> <p>Requirement 12 in Schedule 2 to Draft DCO [EN010162/APP/3.1B] secures that no phase of the authorised development may commence until a construction environmental management plan for that phase has been submitted to and approved by Newark and Sherwood District Council. This must be prepared in accordance with the ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A].</p>



4.4 CULTURAL HERITAGE AND ARCHAEOLOGY

4.4.1 This section addresses the issues raised in the RRs in relation to the effects of the Development on the Cultural Heritage and Archaeology assets, including buried archaeological remains, conservation areas, buildings of historic interest, and designed landscapes, both designated and non-designated.

Table 4-3 Cultural Heritage and Archaeology

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-026 RR-123 RR-198 RR-222	<p>General heritage impacts: The Development could affect the setting of heritage assets and the cultural character of the areas in Norwell, Moorhouse and surrounding villages.</p>	<p>An assessment of the effects of the Development on both above ground and below ground heritage assets is provided in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] and ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2A]. The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures.</p> <p>A final AMS will provide details on any areas of archaeology to be subject to further evaluation prior to detailed design, the techniques to be employed as well as a programme in the context of the post-consent, pre-construction period. It will also provide an outline programme for mitigation works including post-excavation assessment, analysis, publication and archiving.</p>
RR-012 RR-136 RR-199	<p>Designated Heritage Assets: Concerns raised about the visual and traffic impacts to designated heritage assets such as the Grade 2* listed Moorhouse Chantry Chapel and other listed Farm buildings.</p>	<p>The Development has been designed to minimise or avoid physical effect on the designated heritage assets and the setting of heritage assets.</p> <p>Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields and the majority of Conservation Areas have been excluded from the Order Limits so that no physical effects will occur to these designated heritage assets. The exception is that the Order Limits lie partially within the outer edges of the Conservation Area at Maplebeck. The details of the heritage assets is provided in ES Volume 4, Technical Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2A].</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>The Development includes proposals for new woodland planting and proposed hedge and tree belt that will, when taller than c. 3.5 m, provide visual screening to remove or limit views from receptors of solar PV and/or substations and other infrastructure.</p> <p>With the development design in place, an assessment of the effects of the Development on the designated heritage assets is provided in Section 11.8 of the ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054].</p> <p>For construction and decommissioning phases (see Sections 11.8.1 and 11.8.3), none of the heritage assets within the study areas were identified as being sensitive to the increased visibility of works (e.g. cranes, vehicles, flashing lights, and noise) within the Order Limits; vibration from construction traffic affecting built heritage assets; and hydrological changes impacting waterlogged or saturated deposits due to alterations in the water table or flow caused by the Development. The limited range and duration to each individual asset would not result in a marked alteration in setting and thus will not lead to an effect to their heritage significance.</p> <p>For operational phase (see Section 11.8.2.2), none of the selected heritage assets are expected to experience indirect effects to the heritage significance through change within their setting that are considered significant in EIA terms.</p>
RR-160	<p>Non-designated Heritage Assets: Concerns raised about the effect on the historic setting in the former RAF Ossington WW2 Airfield.</p>	<p>An assessment of the effects on the non-designated heritage assets is provided in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054].</p> <p>The significance of former RAF Ossington rests principally in its archaeological and historic interest to which its setting does not contribute.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-116	<p>Archaeology and Trenching: Concerns that areas do not appear to have been fully assessed. Full archaeological exploration has not been completed</p>	<p>To establish a baseline understanding of the potential for sub-surface archaeology, the Applicant completed a desk-based assessment, geophysical surveys and two phases of trial trenching and are provided in the following documents:</p> <ul style="list-style-type: none"> • ES Volume 4, Appendix 11.1: Archaeological Desk-Based Assessment [EN010162/APP/6.4.11.1] [APP-251] [APP-252] [APP-253] [APP-254]. • ES Volume 4, Appendix 11.4: Phase 1 Geophysics Results [APP-257] and ES Volume 4, Appendix 11.5: Phase 2 Geophysics Results [APP-258] [APP-259] [APP-260] [APP-261] [APP-262] • ES Volume 4, Appendix 11.6: Phase 1 Trial Trenching Results [EN0101/APP/6.4.11.6] [APP-264] [APP-265] and ES Volume 4, Appendix 11.7: Phase 2 Trial Trenching Interim Results [EN0101/APP/6.4.11.7] [APP-266] [APP-267] [APP-268] <p>The Applicant notes that the approach to the desk-based assessment and trial trenching has been discussed with the County Archaeology and is set out within Statement of Common Ground with Nottinghamshire County Council (NCC) [EN010162/APP/8.1].</p> <p>The desk-based assessment, geophysical survey and the quantity of evaluation trenching are considered to be proportionate at this stage. Further evaluation will take place post-consent as detailed in the ES Volume 4, Appendix 11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8] [APP-269]. The Applicant has included flexibility in the Works Plans [EN010162/APP/2.3A] [AS-005] to relocate Development elements and/or utilise non-invasive installation methods (ballast) to avoid any impact on sub-surface archaeology which may be identified during construction works and further archaeological investigation.</p> <p>Requirement 11 in Schedule 2 of the Draft DCO [EN010162/APP/3.1B] secures that no phase of the authorised development may commence until an</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		archaeological mitigation strategy for that phase has been submitted to and approved by NCC. This must be in accordance with the ES Volume 4, Appendix 11.8: Outline AMS [EN010162/APP/6.4.11.8] [APP-269] .

4.5 FLOOD RISKS, DRAINAGE AND WATER

4.5.1 This section summarises the issues raised in the RRs in relation to the effects of the Development on water resources, which comprise surface water (rivers, streams and ponds) and groundwater (water that exists within the soil or rock), along with the Applicant’s responses to those issues.

Table 4-4 Flood Risks, Drainage and Water

RR References	Summary of Issue Raised in RR	Applicant’s Responses
RR-001 RR-005 RR-007 RR-008 RR-012 RR-014 RR-017 RR-020 RR-022 RR-031 RR-039 RR-042 RR-043 RR-049 RR-053 RR-058	<p>Flood Risk (including surface water): Concerns raised about the absence of strategic flood alleviation measures in Maplebeck, Caunton, Norwell, Little Carlton, and Cromwell. This would result in increased risk of runoff from solar panels and increased risks of flooding on areas around the River Trent corridor, Caunton Beck and Moorhouse Beck. Areas such as Carlton on Trent and Sutton on Trent, as well as the A1 and the East Coast Main Line railway would be affected.</p>	<p>As outlined in the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B], drainage measures for all aspects of the Development will ensure that runoff rates for hard surfaces are controlled to the baseline values. Solar PV was removed from the eastern section of the site following the PEIR stage assessments and grassland, scrub, an orchard and scattered trees is proposed for areas close to the River Trent floodplain which is compatible with the EA’s “Working with natural processes to reduce flood risk 2024” FCERM research report. As such, the Development will not exacerbate offsite flooding.</p> <p>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.</p> <p>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.</p> <p>An assessment of the effects of the Development on flood risk both within the Site and the surrounding area is provided in ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052], with supporting information provided in ES Volume 4, Appendix 9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]The assessment concludes that the risk of the Development flooding from all sources is Low to Negligible.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-060 RR-076 RR-078 RR-084 RR-087 RR-090 RR-093 RR-104 RR-108 RR-109 RR-121 RR-126 RR-133 RR-139 RR-142 RR-151 RR-159 RR-178 RR-180 RR-195 RR-196		<p>ES Volume 4, Appendix 9.1: Flood Risk Assessment (FRA) [EN010162/APP/6.4.9.1B] was informed by a Sequential Test as provided as Appendix C to the FRA. The Development has been sequentially designed to locate the most electrically sensitive infrastructure (e.g., PV arrays, the substation compounds, BESS, inverters and transformers) outside of Flood Zones 2 and 3 to mitigate against the risk of flooding.</p> <p>The Applicant notes that the approach to flood risk has been agreed with the Environment Agency and is set out within the Statement of Common Ground with the Environment Agency [EN010162/APP/8.3].</p> <p>Embedded Mitigation within the design of the Development has been set out in the ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]. The surface water management at each work area is specified in between Section A9.1.3 to A9.1.6 of ES Volume 4, Appendix 9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B].</p> <p>Requirement 12 in Schedule 2 to Draft DCO [EN010162/APP/3.1B] secures that no phase of the authorised development may commence until a construction environmental management plan for that phase has been submitted to and approved by Newark and Sherwood District Council. This must be prepared in accordance with the ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A].</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-199 RR-200 RR-201 RR-207 RR-209 RR-210 RR-211 RR-212 RR-214 RR-215 AS-055 AS-062 AS-065 AS-066 AS-068 AS-070 AS-071 AS-076		
RR-006 RR-066 RR-218	<p>Flood Risk in the area of the A1 between Carlton-on-Trent and Egmanton: Concerns raised that the proposed flood alleviation</p>	<p>The Work Area located within Flood Zone 2 and 3 upstream of the dyke system draining to Carlton-on-Trent is Work Area 3: Enhancement and Mitigation, comprising grassland, scrub, and scattered trees which is compatible with the EA's "Working with natural processes to reduce flood risk 2024" FCERM research</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
	<p>measures are inadequate, particularly in the area of the A1 between Carlton-on-Trent and Egmanton, given the local clay soil conditions and how drainage issues have already been worsening due to the Egmanton Solar Park.</p>	<p>report. By having year-round vegetation cover and increased trees, the roughness of the ground surface is increased compared to the baseline and therefore surface water runoff rates will be slowed.</p> <p>Solar PV was removed from Flood Zones 2 and 3 along Moorhouse Beck and Mitigation and Enhancement remains, which would consist of grassland. Compared to the baseline scenario of high runoff rates from intensively farmed clay-based soils, surface water runoff rates will be slowed as the fields within the Site will no longer be:</p> <ul style="list-style-type: none"> • Ploughed or furrowed; • Left without vegetation cover for long periods in the winter; and • Regularly traversed by heavy farm machinery. <p>As discussed Egmanton Parish Council on several visits to understand the mechanisms for flooding within the village and surrounding areas, the Development is located outside of the catchment of Egmanton. As such, the Development cannot contribute to runoff which causes flooding within Egmanton or have a cumulative effect with the existing Egmanton Solar Farm.</p>
RR-159	<p>Water Quality (including pollution prevention): Concerns raised that the impact of construction groundworks, chemical handling and firewater from BESS could result in chemical pollution of water features.</p>	<p>An assessment of the effects of the Development on water quality is considered in Section 9.6.1 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052]. Table 9.11 Predicted effects of the Development concludes that with the mitigation measures which are secured, the significance of effect during all phases of the Development would be negligible.</p> <p>The mitigation measures are managed in Section A5.3.9 Pollution Prevention Plan within ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A] and they are also summarised in Section 9.5 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052].</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>Measures to fully contain spent firewater from the BESS is outlined in Section A9.1.4 of ES Volume 4, Appendix 9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]. With these measures in place, Section 9.6.2.2 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] assesses the significance of all effects associated with chemical pollution for the operation of the Development are assessed as being Negligible and Not Significant.</p> <p>As stated in the Statement of Common Ground with the Environment Agency [EN010162/APP/8.3], the Environment Agency agrees that the measures within the Pollution Prevention Plan are appropriate in safeguarding ecological features during construction.</p>

4.6 GENERAL

4.6.1 This section summarises the issues raised in the RRs in relation to the general matters, including policy compliance, decommissioning arrangement, and other miscellaneous matters. The Applicant has provided responses to those issues.

Table 4-5 General

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-075 RR-201	<p>Compliance with the National Planning Policy Framework and local policies: Comments relating to the Development as submitted being contrary to Newark and Sherwood's Core Strategy and LDF; the National Planning Policy Framework (NPPF); the Draft Nottinghamshire Local Nature Recovery Strategy.</p>	<p>The Development is fully in accordance with national policy as set out in NPS EN-1 and NPS EN-3 as detailed in ES Volume 2, Chapter 6: Planning Policy [EN010162/APP/6.2.6] [APP-049].</p> <p>The NPPF has been assessed within ES Volume 2, Chapter 6: Planning Policy [EN010162/APP/6.2.6] [APP-049], including paragraphs 187 and 189 of the NPPF December 2024 refer to Section 15: Conserving and Enhancing the natural environment. The Development is fully in accordance with the NPPF.</p> <p>The Proposed Development has been designed with robust mitigation measures to minimise environmental and community impacts. These measures are secured through the DCO and detailed in the relevant ES chapters, ensuring that adverse effects are reduced during construction, operation, and decommissioning.</p> <p>As part of the Planning Balance as described in Planning Statement [EN010162/APP/5.4A], the Applicant has committed to delivering significant community benefits as part of the Proposed Development, which include:</p> <ul style="list-style-type: none"> • Generate Renewable energy to power the equivalent of approximately 400,000 homes; • Biodiversity Net Gain; • Economic, Educational and Sustainability Benefits; • Enhanced Landscape and Public Access legacy

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>These enhancements should be factored into the planning balance, weighing the national significance and sustainability benefits of the project against local impacts. National policy under NPS EN-1 and EN-3 explicitly supports renewable energy projects where the public interest and economic benefits outweigh residual impacts</p>
<p>RR-007 RR-008 RR-098 RR-130 RR-135 RR-147 RR-159 RR-022 RR-200 RR-205 RR-212 RR-223 AS-062 AS-068 AS-072</p>	<p>Impact on residential property values: Concerns regarding potential impacts on residential house prices, requiring further mitigation to protect the residential properties closest to the Development.</p>	<p>Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law.</p>
<p>RR-093 RR-200</p>	<p>Decommissioning timing and arrangement: Concerns raised about the decommissioning</p>	<p>The Development would operate for 40 years and the Applicant has secured the decommissioning in Requirement 19 of Schedule 2 to the Draft DCO [EN010162/APP/3.1B].</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-210	<p>process and the recycling and disposal of panels throughout the Development's cycle. No early termination clause to allow some/all of the land to returned to full agricultural earlier than the current Development timeframe.</p>	<p>ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] provides details of the decommissioning programme and the controls mitigations to the recycling and disposals of panels.</p> <p>As set out in Section A5.6.2 of ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A], the Applicant would be responsible for decommissioning the Development which involves the removal of infrastructure built as part of the Development in Work Area 1 (Solar PV) and Work Area 5a (BESS). Other infrastructure that may be removed or retained is set out in Section A5.6.2.1 of the DRP.</p> <p>After decommissioning, the grassland areas in Work Area 1 (Solar PV) will return to agricultural use and the land used during the operation of the Development as arable farmland enhanced for mitigation purposes would generally revert to just arable farmland, at the discretion of the landowner. Woodland, hedgerows and trees planted as mitigation/ enhancement as part of the Development will be retained following decommissioning.</p> <p>Further details of decommissioning works and environmental management measures would be subject to agreement with planning authority before they commence. This is also secured through Requirement 19 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] which provides that prior to commencement of any decommissioning works for any part of the Development, a decommissioning and restoration plan must be submitted to Newark and Sherwood District Council for its approval, in consultation with Nottinghamshire County Council.</p> <p>All decommissioning activities will take place in line with a Soil Management Plan, which is secured through Requirement 20 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B].</p>
RR-053 RR-083	<p>Waste: Concerns about solar panel disposal, including the risk of toxic materials leaching into the</p>	<p>Site Waste Management Plans (SWMPs) have been provided to secure waste management controls for the construction, operation and decommissioning phase</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-121 RR-214 AS-061	soil, and questions remain about how waste from the Development will be managed.	<p>of the Development. Each of these will be secured via a DCO Requirement. They are provided within:</p> <ul style="list-style-type: none"> • ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A] • ES Volume 4, Appendix A5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5A] • ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] <p>During construction, excavated soil would be either stored for re-use as described in the ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2] [APP-290] [APP-291] [APP-292] [APP-293] or re-used within the Order Limits as part of the landscaping described in ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A]. The worst-case estimates of the construction waste are set out in Table 16.8 of the ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059].</p> <p>During decommissioning phase, it is expected that the metals comprising the cabling, solar PV mounting pole structures, inverters/transformers and fencing as well as other components, including inert waste, will be recycled. An estimate of the principal waste arisings from the complete removal of components at decommissioning (excluding de minimis) is set out in Table 16.10 the ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059].</p>
RR-098	Dust Pollution: General concern on the impact of dust pollution on nearby properties.	Section 16.2 of ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] assesses the potential effects relating to dust arising from the Development. The methods for the assessment are set out in Section 16.2.4.2 and follow relevant professional body guidance. Potential effects are assessed in Section 16.2.6.1 as being of low or negligible risk. Mitigation

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>measures are set out in Section A5.3.7 of ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]. Requirement 12 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that prior to the commencement of any phase of the Development a CEMP must be submitted to and approved by Newark and Sherwood Council, and that the CEMP must be in accordance with the Outline CEMP.</p>
RR-036	<p>Development Funding: Concerns over how the Development would be funded and seeking certainty on the financial viability of the Development.</p>	<p>As set out in the Funding Statement [EN010162/APP/4.2] [APP-014], the Applicant for the DCO Application is Elements Green Trent Limited (company number 13665771). The Development will be funded by the Applicant via capital injections in the form of shareholder loans funded ultimately by the Beneficial Owner.</p>
RR-031 RR-061 RR-081 RR-083 RR-130 RR-136 RR-151 RR-177 RR-207 RR-214 RR-219	<p>Climate Change: Concerns raised about the sustainability credentials of the panels and the accuracy of the carbon emission calculations. Concerns raised that whether the changing climate and the increasing frequency of severe weather events have been adequately considered in the Environmental Statement</p>	<p>The possible impacts of the Development on the climate throughout its construction, operation, and decommissioning phases has been assessed and the assessment is provided in ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15] [APP-058].</p> <p>The Applicant expects (but cannot commit at this time, as explained in Section 15.5 of the Chapter) to achieve substantial further reductions in carbon footprint (relative to that assessed in this chapter) through procurement of the solar PV mounting structures, by:</p> <ul style="list-style-type: none"> • Sourcing steel for the solar PV mounting structures from UK-based suppliers, avoiding the carbon footprint from shipping steel internationally; • Sourcing steel from manufacturers that use electrical arc-furnaces rather than fossil-fuel-fired furnaces;

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<ul style="list-style-type: none"> • Transporting the steel to site as sheet steel, which requires fewer heavy goods vehicles; and • Use on-site manufacturing of the sheet steel into the mounting structures, using on-site-generated solar power for the equipment for this. <p>Extreme weather is a feature of the baseline climate, and this has been considered in ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A] to ensure that the Development is prepared for climate related events during the construction phase. This includes pro-active measures such as covering materials when stored on site. A climate change resilience assessment has been carried out within ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15] [APP-058] to assess the Developments ability to withstand significant changes in climatic variables, including temperature, wind speed, precipitation, and cloud level, as well as extreme events, such as storms. It was found that the predicted future climatic baseline conditions have a very low risk of affecting the Development due to the design measures.</p>
RR-002 RR-016 RR-052 RR-062 RR-063 RR-080 RR-082 RR-092	<p>Support/Neutral: General statement of support.</p>	<p>Noted.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-105 RR-122 RR-124 RR-202		
RR-001 RR-006 RR-015 RR-028 RR-030 RR-035 RR-049 RR-065 RR-066 RR-048 RR-069 RR-072 RR-075 RR-075 RR-079 RR-097 RR-099	<p>General Objection: Respondents disagree that the benefits are outweighed by the harm of the Development. Raising general concerns about the construction, operation and decommissioning impacts.</p>	<p>As set out in the Planning Statement [EN010162/APP/5.4A], It is clear that there is a compelling case for the need for the Development and that it will deliver national economic and social benefits in line with the Government's wider objectives of delivering sustainable development. The Development's benefits are summarised in the Planning Statement [EN010162/APP/5.4A] . It is considered that adverse impacts arising from the Proposed Development, and cumulatively with other developments, would be unlikely to outweigh its benefits.</p> <p>The effects of the Development and other matters have been covered in the relevant sections of this Report.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-107 RR-109 RR-121 RR-127 RR-128 RR-130 RR-130 RR-135 RR-141 RR-145 RR-159 RR-022 RR-179 RR-019 RR-187 RR-218 AS-074		
RR-057 RR-137 RR-173 RR-029	Registration as an Interested Party	Noted.

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-051 RR-185		
RR-193 RR-186	<p>Documents-related issue: Respondents asked to see a map of the location of the project. Concerns that the drawings are not legible to identify the boundaries and access route.</p>	<p>The development location is shown in ES Volume 3, Figure 1.1: Development Location [EN010162/APP/6.3.1A] [AS-028] and ES Volume 3, Figure 5.5: Illustrative Construction Layout [EN010162/APP/6.3.5B] identifies the site access location, as well as the proposed footpath and permissive routes network.</p>
RR-078	<p>Rochdale envelope and securing mechanisms: The representative questioned the effectiveness of an outline management plan for the ExA to properly assess the mitigations. The application should specify a detailed, fixed layout (or smaller envelope) for ecological receptors to be properly assessed.</p>	<p>The 'Rochdale Envelope' assessment approach has been recognised and endorsed in the Planning Inspectorate (PINS) Advice Note Nine: Rochdale Envelope uncertainty exists and necessary flexibility is sought. The Applicant has set out the EIA Approach in ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045], noting a worst-case scenario has been assessed in each ES chapters on the basis that these would give rise to the greatest potential impacts. Schedule 2 of the dDCO requires that the final management plans be approved by the relevant planning authority before the relevant work or activity may take place. As such, it is considered that the approach to the EIA is robust and has considered the good design principles.</p>
RR-061 RR-211	<p>NG+ Scheme: Clarification required about the NG+ Scheme and the scope of the Development's benefit. Suggestions were made to include flood alleviation schemes in Caunton, implement rooftop panels and improve Caunton playing field</p>	<p>As stated in Section 4.6 of the Planning Statement [EN010162/APP/5.4A], the Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the effects of the Development. Therefore, the SoS cannot, and should not, apply any weight to the Community Benefit Fund when balancing the positives and negatives of the Development. The Community Benefit Fund is therefore not taken into account in consideration of the planning balance within the Planning Statement [EN010162/APP/5.4A].</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
	facilities as part of the NG+ Scheme.	
RR-003 RR-010 RR-020 RR-026 RR-061 RR-098 RR-115 RR-161 RR-180 RR-194 RR-198 RR-200 RR-201 RR-204 RR-206 RR-211 RR-214 RR-219 RR-221	<p>Cumulative impact due to the number of projects in the region: General concerns on the sequential cumulative effects of the 12 operational solar farm in the district, two existing BESS sites at Averham/Staythorpe and a new solar application expected at Barnby-in-the-Willows.</p>	<p>Existing developments are considered as part of the baseline. Proposed developments, that may be part of the future baseline, are identified using an approach that follows PINS guidance. Stages 1 and 2 (other developments to be considered in the assessment of cumulative effects) are described in Section 2.3.8 of ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045] and ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1A].</p> <p>Sites identified to be considered in the assessment of cumulative effects include, amongst others:</p> <ul style="list-style-type: none"> • The A46 upgrade; • Changes to mineral extraction proposals; and • Solar and BESS proposals. <p>Stages 3 and 4 are reported by environmental topic as appropriate in chapters 7-19:</p> <ul style="list-style-type: none"> • Section 7.9 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050] • Section 8.9 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8] [APP-051] • Section 9.8 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052] • Section 10.8 of ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10] [APP-053]

RR References	Summary of Issue Raised in RR	Applicant's Responses
<p>AS-055 AS-067</p>		<ul style="list-style-type: none"> • Section 11.10 of ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054] • Section 12.8 of ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055] • Section 13.9 of ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] • Section 14.10 of ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [APP-057] • Section 15.6 of ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15] [APP-058] • Section 16.2.7 of ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] • Section 17.8 of ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060] • Section 18.8 of ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A] <p>All potential cumulative effects are assessed as not significant, except for those relating to climate change, for which Section 15.6 of identifies that, "<i>When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.</i>"</p> <p>These effects will be secured by implementation of the Development as described, together with the control measures as set out.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-006 RR-026 RR-066 RR-099 RR-116 RR-218	<p>Consultation:</p> <p>Concerns were raised about the adequacy of community consultation, noting that the developer did not actively engage with local residents. Some of the concerns raised by residents were reportedly ignored, and certain information is not accessible to individuals who are not familiar with using computers.</p>	<p>ES Volume 2, Chapter 3: Consultation [EN010162/APP/6.2.3] [APP-046] and the Consultation Report [EN010162/APP/5.1] [APP-296] provides the approach taken to consultation to date.</p> <p>The Applicant carried out comprehensive pre-application consultation on its proposals prior to submitting the DCO Application, including a six-week non-statutory consultation, a six-week statutory consultation and a four-week targeted consultation.</p> <p>The pre-application statutory consultation was undertaken in accordance with the requirements of the Planning Act 2008 ('PA 2008'), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, having regard to guidance issued under section 50(3) of the PA 2008. The Consultation Report [EN010162/APP/5.1] [APP-296] evidences a comprehensive and iterative consultation process compliant with the relevant legislation and guidance. Supporting documents include the Statement of Compliance and the early Adequacy of Consultation Milestone document, both provided in Appendix 5.1.1 [EN010162/APP/5.1.1] [APP-018]. The Statement of Compliance sets out how the legislative and guidance requirements were met, while the Adequacy of Consultation Milestone document explains the opportunities given to relevant host authorities to comment on the adequacy of consultation prior to the application's submission.</p> <p>In addition, the Applicant undertook non-statutory meetings with a range of statutory and non-statutory consultees and stakeholders with an interest in the Development throughout the pre-application stage. The Applicant consulted in a variety of ways to maximise consultee participation, and responses to all feedback received during the pre-application consultation are provided in the Consultation Report [EN010162/APP/5.1] [APP-296] and accompanying appendices.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>In line with the commitment set out in the Applicant's Statement of Community Consultation (SoCC), the Applicant published a range of consultation materials including a Central Booklet summarising the proposals, a Non-Technical Summary of the PEIR, held a series of eight in-person information events and one online information event where the proposals could be discussed with members of the Applicant's project team, and hosted free-to-use dedicated communication channels for enquiries. This included notifying over 5,900 properties within the vicinity of the Development, which were identified within a defined Core Consultation Zone presented in the SoCC. In addition to this, the Applicant made consultation materials available online, at four CAP sites, at public information events and by request to the dedicated communication lines. Consultation opportunities and materials were further publicised by local media advertising, statutory notices, and maintaining a register of interested individuals</p> <p>The Development's free-to-use communications channels were open throughout the consultation period to provide assistance to consultees where issues of misunderstanding arose.</p> <p>In accepting the DCO Application, the Planning Inspectorate have confirmed the Applicant's pre-application consultation has complied with the requirements of the PA 2008.</p>

4.7 GROUND CONDITIONS

4.7.1 This section addresses the issues raised in the RRs in relation to the effects of the Development on land instability beneath the site.

Table 4-6 Ground Conditions

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-005	<p>Ground Conditions: Concerns about the land instability as a result of the Development</p>	<p>An assessment of the effects of the Development on land instability from natural processes or mining related activities within the Order Limits is provided in ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10] [APP-053] and supporting Appendices ES Volume 4, Appendices TA A10.11 – Desk Study and Preliminary Risk Assessment Groundsure Data - Parts 1 to 11 [EN010162/APP/6.4.10.11.1 to EN010162/APP/6.4.10.11.11] [APP-230], [APP-231], [APP-232], [APP-233], [APP-234], [APP-235], [APP-236], [APP-237].</p> <p>The assessments undertaken have identified that without the need for any further mitigation measures, the Development would not increase the risk of land instability within the Order Limits resulting from former coal or non-coal mining activities.</p> <p>The assessment of risk of land instability caused by natural processes has identified predominantly negligible to low risks of ground instability associated with the geological strata present with only localised moderate risks. Commitment 10.1 in ES Volume 4, Appendices 7.1 Commitments Register – Rev 1 [EN010162/APP/323] secures that geotechnical ground investigation for each development phase will be undertaken to confirm anticipated ground conditions and relevant design parameters for foundation design. The Applicant has included flexibility in the Works Plans [EN010162/APP/2.3A] [AS-005] to relocate Development elements if required to avoid increased risk of land instability that may be identified during geotechnical ground investigation works.</p>



4.9 HEALTH, SAFETY AND SECURITY

4.9.1 This section addresses the issues raised in the RRs in relation to the effects of the Development on human health, safety and the risk of major accidents or disaster. The risk of fire and associated impacts from the BESS is considered in in Section 4.2 of this Report.

Table 4-7 Health, Safety and Security

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-093 RR-104 RR-121 RR-159 RR-209	<p>Major Accidents or disaster: Concerns about the risk of fire and associated impacts from the BESS and other components of the Development.</p>	<p>The BESS has been carefully sited away from residential properties. The nearest receptors to the BESS unit are located at Flash Farm and Kelham, approximately 550 metres and 750 metres away, respectively. The site selection process is detailed in ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047].</p> <p>The BESS layout has been designed to mitigate fire risk and prevent firewater contamination, as outlined in Concept Design Parameters and Principles [EN010162/APP/7.14A]. ES Volume 4, Appendix A5.4: Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4A] provides proactive measures aiming to deter the spread of fire should it occur on-site. Measures include fire safety arrangements, monitoring, emergency response plan and maintenance schedule. On this basis, ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059] concludes that the risk associated with a potential fire in a battery unit is not a significant effect.</p> <p>Requirement 7 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that prior to the commencement of Work No.5A a FSMP must be submitted to and approved by Newark and Sherwood Council in consultation with Nottinghamshire Fire and Rescue Service and the Environment Agency. This must be in accordance with the ES Volume 4, Appendix A5.4: Outline FSMP [EN010162/APP/6.4.5.4A] and must be implemented as approved.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-020 RR-022 RR-074 RR-117 RR-121 RR-125 RR-134 RR-143 RR-147 RR-151 RR-189 RR-214 AS-055 AS-069 AS-073 AS-076	<p>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. There are potential effects of changes to EMF on human's physical health.</p>	<p>A Human Health Impact Assessment (HHIA) has been undertaken to consider key determinants to protect human health and it is provided in Section 16.4 of the ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059]. The assessment has considered the interrelationships of impacts informed by other chapters in the ES on residents and subsequent effects on health and wellbeing.</p> <p>The outcome of the HHIA concludes that the Development is unlikely to negatively affect people's health and wellbeing in its widest sense. There are no effects that:</p> <ul style="list-style-type: none"> • Cause potentially severe or irreversible negative effects; • Affect a large number of people; or • Specifically, may affect people who already suffer poor health or are socially excluded. <p>Potential effects of electromagnetic fields are assessed in section 16.6 of ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16] [APP-059], which concludes that no significant effects from electromagnetic fields are anticipated, and hence there are no anticipated effects on human health from electromagnetic fields.</p> <p>Potential beneficial effects on health include effects the Development will have through employment and the creation of more recreational routes.</p> <p>The Applicant has also provided an adequate consultation and has maintained an open discussion with the public throughout the design process, aiming to reduce uncertainty for local people as far as possible and to prevent any physical or psychological impact from an early stage of the Development.</p>

4.10 LAND USE

4.10.1 This section addresses the issues raised in the RRs in relation to the effects of the Development on soils and their agricultural quality and agricultural businesses.

Table 4-8 Land Use

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-005 RR-008 RR-010 RR-012 RR-019 RR-026 RR-028 RR-032 RR-036 RR-039 RR-040 RR-042 RR-049 RR-053 RR-058 RR-059 RR-061	<p>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. Some respondents questioned the accuracy of the ALC survey and disagreed with the grading results.</p>	<p>In terms of the ALC and its accuracy, the survey has been carried out by qualified and experienced surveyors at a detailed level, and it follows NE's guidance. It provides the classification of land required in order to understand and assess impacts of the Proposed Development, including the amount of BMV. The results are provided in the ALC report [APP-288 and APP-289].</p> <p>The ES Chapter 17 [APP-060] assesses the quality of land that will be affected temporarily for construction, temporarily for the duration of the operational phase, and permanently.</p> <p>The factual analysis regarding the temporary and permanent use and loss of agricultural land are found in the documents as signposted below. It is worth emphasising that mostly the proposals are reversible. The quantum of permanent loss is limited, such that mostly the considerations need to focus on land use rather than land loss.</p> <p>In terms of land quality within the site, the key reference is as follows.</p> <p>ES Volume 4, Appendix 17.1: Agricultural Land Classification Survey [EN010162/APP/6.4.17.1] [APP-288] [APP-289] states that the Site (within the Order Limits) comprises 149ha (8.5%) of Grade 2 land, 944ha (53.5%) of Grade 3a land, 596ha (33.8%) of Grade 3b land and 75ha (4.2%) of non-agricultural and not surveyed land. As stated in Table 17.8 of the ES Chapter, the Development excluding the Works No. 2, Cables (which will not be affected other than short-term) involves the use of 1030.9ha of BMV land within the Order Limits, and 285.3ha of the BMV land will be used for Work No.3, Enhancement and Mitigations.</p> <p>Only a small part of the land is physically affected by soil movement, to create tracks, and for the substation and BESS areas. Temporary short-term disturbance</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-067 RR-069 RR-075 RR-076 RR-081 RR-083 RR-084 RR-086 RR-088 RR-089 RR-094 RR-098 RR-108 RR-109 RR-112 RR-115 RR-117 RR-125 RR-126 RR-136 RR-140		<p>for burying cables, or short-term construction compounds, will be restored to comparable ALC grade.</p> <p>In respect of the amount of land disturbed for physical works for tracks and infrastructure, the key reference from the ES is as follows.</p> <p>ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060] at paragraph 142 states that: <i>“Accordingly, potentially the Development involves the permanent loss of 4.5 ha of BMV, as expected, for Work no. 4 and Work no. 5b. Even if none of the land was restored, the permanent loss of 19.4 ha of BMV (worst-case assessment) represents a negligible proportion of BMV agricultural land at a District, County or National level. The threshold for consultation with Natural England is 20 ha of BMV and, whilst for EIA the effect is assessed as significant, in land-use planning considerations the effect would not weight significantly against the benefits. However, the realistic expectation is for the loss of 4.5 ha of BMV, all subgrade 3a.”</i></p> <p>The quantum of land temporarily affected is a negligible proportion of land in the District and Country. The permanent loss of 4.5 ha of BMV is negligible in a local and national context.</p> <p>Table 17.14 of the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060] shows the proportion of land by ALC grade at a district, county level (based on the provisional ALC maps and so to be treated with caution due to their limitations) suggesting that the permanent loss as a result of the Development represents a negligible proportion of the 182,819 ha of agricultural land in Nottinghamshire , of which an estimated 50.2% is BMV.</p> <p>The Development minimises impacts on agricultural land in accordance with national policy by keeping the permanent loss of BMV land to a very low amount and retaining the ability to reinstate arable agriculture after decommissioning.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-145		
RR-147		
RR-150		
RR-159		
RR-161		
RR-170		
RR-171		
RR-172		
RR-177		
RR-194		
RR-195		
RR-201		
RR-207		
RR-208		
RR-214		
RR-216		
RR-217		
RR-222		
RR-223		
RR-225		
AS-055		

RR References	Summary of Issue Raised in RR	Applicant's Responses
AS-056 AS-059 AS-060 AS-062 AS-064 AS-067 AS-072 AS-073 AS-075 AS-076		
RR-049 RR-060 RR-064 RR-085 RR-121 RR-130 RR-151 RR-159 RR-180 RR-205	<p>Food security: Concerns raised about the impact of agricultural land loss would reduce food production levels. Farm businesses will be affected.</p>	<p>Concerns about food security are understood, but need to be considered in context of food production and land availability in England and the UK, and in the context of climate and energy concerns. There is no requirement for land to be farmed for food, and large areas are not.</p> <p>The implications for food production has been considered in Section 17.8 of the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060], specifically in the local and national context.</p> <p>There is no concern from the Government about food security, and no requirements or incentives to manage land for food production. The land use change from agriculture (only some of which is for food) to a mix of energy production and agriculture will not result in any significant adverse environmental or economic effects. As such, on a national and regional basis the implications of the use of BMV in this case for solar PV arrays and potential sheep production, rather than for arable</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-206 RR-215 RR-217 RR-219 AS-056 AS-057 AS-060 AS-061 AS-063 AS-064 AS-071 AS-070		<p>crop production, is negligible. Assuming that solar deployment needs to take place on agricultural land, the incremental difference is less than 2,000 tonnes per annum.</p> <p>The land use implications have been assessed in context. As set out in Chapter 17 at paragraph 189 and 208, in June 2024 some 580,662 ha was either arable land used for environmental benefit but not in production, or bare fallow. The 1 June 2025 statistics show that 544,610 ha were uncropped, but the area of land uncropped but in environmental uses had increased from 304,980ha to 443,792 ha (Agricultural Land Use in England at 1 June 2025, Defra, 25 September 2025).</p>
RR-078	<p>Soil Handling and Management: The site-wide soil management and restoration measures are insufficiently detailed and are not guaranteed.</p>	<p>Detailed information has been collected about the soils across the Order Limits. The ALC survey [APP-286 and APP-289] records soils on a regular 100m grid.</p> <p>ES Volume 4, Technical Appendix A17.2: Outline Soil Management Plan (SMP) [EN010162/APP/6.4.17.2] [APP-290] [APP-291] [APP-292] [APP-293] has been developed to secure the appropriate handling soils for the construction and decommissioning works.</p> <p>The Applicant also notes that the approach to soil management is currently under discussion with Natural England and Newark and Sherwood District Council and are set out within Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2] and Statement of Common Ground with Natural England [EN010162/APP/8.4].</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>Requirement 20 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that prior to the operation of the Development a SMP for each phase must be submitted to and approved by Newark and Sherwood District Council. This must be in accordance with ES Volume 4, Technical Appendix A17.2: Outline SMP [EN010162/APP/6.4.17.2] [APP-290] [APP-291] [APP-292] [APP-293] and must be implemented as approved.</p>
<p>RR-032 RR-049 RR-142 RR-143 RR-147 RR-200 RR-217 AS-076</p>	<p>Land use after decommissioning: Raise concerns about decommissioning and whether the land would be returned to farm land.</p>	<p>The Development would operate for 40 years and the Applicant has secured the decommissioning in Requirement 19 of Schedule 2 to the Draft DCO [EN010162/APP/3.1B].</p> <p>The Applicant would be responsible for decommissioning the Development as described in Section A5.6.2 of ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]. This is secured through Requirement 19 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] which provides that prior to commencement of any decommissioning works for any part of the Development, a decommissioning and restoration plan must be submitted to Newark and Sherwood District Council for its approval, in consultation with Nottinghamshire County Council.</p> <p>ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048] sets out the key activities that would be undertaken for the Development, accompanied by ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] which provides details of the decommissioning programme.</p> <p>The Applicant would be responsible for decommissioning the Project which involves the removal of infrastructure built as part of the Project in Work Area 1 (Solar PV) and Work Area 5a (BESS). In other Work Areas, all infrastructure would be removed unless it is required to be retained, which would be determined by the final DRP. It is expected that the land will be returned to the landowners for continued farming.</p> <p>The details of decommissioning works and environmental management measures would be subject to agreement with planning authority before they commence. This</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>is also secured through Requirement 19 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] which provides that prior to commencement of any decommissioning works for any part of the Development, a decommissioning and restoration plan must be submitted to Newark and Sherwood District Council for its approval, in consultation with Nottinghamshire County Council.</p> <p>All decommissioning activities will take place in line with a Soil Management Plan, which is secured through Requirement 20 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] .</p>
<p>RR-049 RR-070 RR-076 RR-085 RR-199 RR-200 AS-056 AS-061</p>	<p>Livestock Grazing: Concerns about the inconsistent reporting on how, when and where grazing animals will be used to maintain the grassland and how they would be enclosed. Some concerns are related to the feasibility and effectiveness of sheep grazing below the panels.</p>	<p>Concern is raised about the practicalities of grazing sheep under and around the panels, and that the panels block visibility for sheep. That is not the case. The panels are raised off the ground and visibility under the panels for livestock is good, as the following photograph shows.</p>  <p>The panel areas will all be fenced, and accordingly the sheep will be safely enclosed.</p> <p>The Defra statistics “Agricultural Land Use in England at 1 June 2025 (Defra, 25 September 2025) record 4,937 ha of solar panels also grazed, and 4,563 ha of solar panels not used for agricultural production. Many of the early panels were too low</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>for grazing, which may affect the statistics, but 52% of panel areas on farms were grazed on 1 June 2025.</p>
RR-076	<p>Impact on Land Ownership and Rights: Concerns about the Development may infringe on the rights of agricultural landholders and farmers, disrupting existing land use and livelihoods.</p>	<p>An assessment of the effects of the Development on the agricultural landholders and farmers is provided in ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060] with a summary of effects set out in in Table 17.16 (page 56) of the ES. There are 19 farm businesses occupying land within the Order Limits and the detailed farming information is provided in ES Volume 4, Appendix 17.3: Farm Reports [EN010162/APP/6.4.17.2] [APP-294].</p> <p>The assessment concludes that construction and decommissioning works are temporary and short-term, and there are only low or negligible adverse impacts on farms of medium or low sensitivity, resulting in minor or negligible adverse effects, which is not significant. There will be no further effects on farm businesses during operational phase.</p> <p>Section 17.8.3 of ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060] suggests that following decommissioning, the land will be returned to the landowners in a condition suitable for agricultural use. All decommissioning activities will take place in line with ES Volume 4, Technical Appendix A17.2: Outline Soil Management Plan (SMP) [EN010162/APP/6.4.17.2] [APP-290] [APP-291] [APP-292] [APP-293], which secures that the land will be returned to the landowners for continued farming.</p> <p>Requirement 20 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that prior to the operation of the Development a SMP for each phase must be submitted to and approved by Newark and Sherwood District Council. This must be in accordance with ES Volume 4, Technical Appendix A17.2: Outline Soil Management Plan (SMP) [EN010162/APP/6.4.17.2] [APP-290] [APP-291] [APP-292] [APP-293] and must be implemented as approved.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-102	<p>Cumulative Loss of Farmland: Concerns about the cumulative loss of farmland.</p>	<p>An assessment of the cumulative effects of loss of BMV land Development on BMV land is provided in ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060]. The assessment considers recent NSIP applications in Nottinghamshire and districts within Lincolnshire that share a boundary with Newark and Sherwood District (as agreed with Newark and Sherwood Council), including those consented, as set out in Table 17.21: Baseline ALC Information. These are principally solar scheme proposals which involve the use of approximately 2,350 ha of BMV land within Nottinghamshire and Lincolnshire, and accordingly will be wholly or mostly reversible, and accordingly they will represent a temporary impact.</p> <p>The use of BMV land as a result of the Development is insignificant in the national and regional context. As stated in paragraph 233 of the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17] [APP-060], the Development excluding the Works No. 2, Cables (which will not be affected other than short-term) involves the use of 1030.9ha of BMV land within the Order Limits, representing a reduction of approximately 0.022% of the approximately 5.7million hectares of BMV shown on the provisional maps (see Table 17.14 in Chapter 17). The use of BMV land also represents 1.1% of BMV land in Nottinghamshire and 3.6% of BMV in Newark and Sherwood.</p> <p>The Development and others in the region would use around 3380.9ha of BMV land, representing 3.7% of the BMV land across Nottinghamshire. The cumulative impact is small when considered against the total agricultural land available for food production across the region. As such, there are no significant adverse effects on agricultural land, the agricultural economy or food production.</p> <p>Calculation based on Table 17.4 information. 182,819 ha in Notts, 50.2% BMV, equates to 91,755 ha of BMV. 58,689 ha in Newark and Sherwood, 48.4% BMV, equates to 28,405 ha.</p>

4.11 LANDSCAPE AND VISUAL

4.11.1 This section addresses the issues raised in the RRs in relation to the effects of the Development on the physical fabric (ground level vegetation, hedges, trees and other features such as fences) within the solar park site; the character of the landscape, and views seen by people from roads, recreational routes, settlements and homes.

Table 4-9 Landscape and Visual

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-005 RR-009 RR-020 RR-026 RR-031 RR-035 RR-039 RR-042	<p>Landscape Character Impact: Concerns that the Development will harm the setting of the attractive countryside and historic villages, resulting in a detrimental impact on the rural character and appearance of countryside setting of Norwell, Caunton, Little Carlton, and Bathley, The Development would result in the loss of amenity value of the countryside.</p>	<p>For background and context, the Development location has been carefully selected to avoid any designated landscapes.</p> <p>An assessment of the effects of the Development on the landscape fabric, character and views is provided in Section 7.7.4 of the ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050] and identifies significant effects during all stages of the Proposed Development on the landscape character type which would include most of the solar arrays (Mid-Nottinghamshire Farmlands: Villages Farmlands with Ancient Woodlands LCT), and non-significant effects during all stages of the Proposed Development for other landscape character types as summarised in Tables 7.6 and 7.7.</p>
RR-043 RR-049 RR-061 RR-081 RR-085 RR-087 RR-093 RR-098	<p>Respondents questioned the reliability of viewpoints. The developer has also chosen strategic viewpoints which show the least visible impact rather than the views most impacted.</p>	<p>Measures included within the design to mitigate effects and enhance the landscape and/or views are set out in Table 7.3 and Table 7.4 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]. This includes siting solar arrays in order to minimise visibility from settlements, thereby mitigating effects on immediate village settings. Other measures such as planting and new permissive routes are secured via ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] and ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1A].</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-100		
RR-112		
RR-115		
RR-121		
RR-130		
RR-140		
RR-143		
RR-147		
RR-149		
RR-150		
RR-172		
RR-175		
RR-194		
RR-195		
RR-198		
RR-201		
RR-205		
RR-206		
RR-214		
RR-215		
RR-217		

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-222 RR-223 AS-055 AS-064 AS-067 AS-076		
RR-129 RR-194 RR-206	<p>Residential Visual Amenity Impact: Concerns that views from residential properties and footpaths and bridleways will be adversely affected. The properties most likely to be affected are Beesthorpe Manor Farm and those located in Moorhouse.</p>	<p>An assessment of the visual impacts from residential properties is provided in ES Volume 4, Appendix 7.6: Residential Visual Amenity Assessment (RVAA) [EN010162/APP/6.4.7.6] [APP-213] and considers all homes within 250m of the Proposed Development. .</p> <p>The design of the Development has been carefully considered throughout this period and the proposals include embedded mitigation and enhancement measures. As outlined by paragraph 46 of ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047], the Site has been carefully selected to avoid or reduce visual effects on residential amenity, including:</p> <ul style="list-style-type: none"> • A 50m setback from residential property, and • a 100-metre setback from homes where panels would be openly visible, in cases where existing features do not fully screen residential properties. <p>With the embedded measures set out in Table 7.3 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050], and the provision of new planting and hedgerows as secured in ES Volume 4 Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] and ES Volume 4, Appendix A18.1: Outline Recreational Routes Management Plan (oRRMP)</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>[EN010162/APP/6.4.18.1A], the assessment identifies that effects would not be at the highest level of magnitude (Large) for any properties and effects would not exceed the RVA threshold.</p> <p>Section 6.3 of the Planning Statement [EN010162/APP/5.4A] concludes that the Development has suitably considered the Site's Order Limits proximity to residential dwellings and assessed the potential impacts and is therefore consistent with NPS EN-3.</p>
RR-041 RR-049 RR-058 RR-083 RR-085 RR-142 RR-159 RR-022 RR-178 RR-194 RR-199 RR-209 AS-055 AS-071 AS-070	<p>General Visual Impact: Concerns that views from footpaths and bridleways will be adversely affected.</p>	<p>An assessment of the visual impact on both road users and PRoW users is provided in Section 7.7.10 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050] with supporting information provided in ES Volume 4, Appendix 7.5: Non-Significant Effects [APP-212].</p> <p>Measures included within the design to mitigate effects and enhance the landscape and/or views are set out in Table 7.3 and Table 7.4 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050]. This includes siting solar arrays in order to minimise visibility from settlements and homes. Other measures such as planting and new permissive routes are secured via ES Volume 4, Appendix 5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1A] and ES Volume 4, Appendix 18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1A].</p> <p>During construction and early operation, there would be significant visual effects as a result of Medium-term changes to views for the following visual receptors:</p> <p>Users of public rights of way:</p> <ul style="list-style-type: none"> • Between Micklebarrow Hill and Kelham; • Between Caunton and the A617;

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<ul style="list-style-type: none"> • Between Caunton, Eakring and Kneesall – east of Eakring and around Maplebeck; • Between Kneesall, Caunton and Ossington Airfield; • Between the A1, Ossington and Moorhouse; and • Between Carlton-on-Trent, Ossington and Norwell. <p>Users of local roads:</p> <ul style="list-style-type: none"> • Between Caunton, Eakring and Kneesall; • Between Kneesall, Caunton and Ossington Airfield; and • Between Carlton-on-Trent, Ossington, Cromwell and Norwell – in the north of this area. <p><u>Once planting has matured,</u> there would be significant visual effects during operation and decommissioning for users of public rights of way:</p> <ul style="list-style-type: none"> • Between Micklebarrow Hill and Kelham; • Between Caunton and the A617; • Between Caunton, Eakring and Kneesall – east of Eakring and around Maplebeck; • Between Kneesall, Caunton and Ossington Airfield; • Between the A1, Ossington and Moorhouse, and • Between Carlton-on-Trent, Ossington and Norwell. <p>Concept Design Parameters and Principles [EN010162/APP/7.14A] state that operational lighting will be limited for emergency and overnight maintenance purposes only at inverter stations, or transformer stations and will be directed</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>within the Order limits. The Development is therefore not expected to create significant adverse effects from light pollution.</p>
RR-214	<p>Visualisation viewpoints: Respondents questioned the reliability of wirelines to illustrate views. The developer has also chosen strategic viewpoints which show the least visible impact rather than the views most impacted.</p>	<p>Wirelines are the primary technical visualisations which inform the assessment and are widely used widely used by assessors in the field for many forms of development. Photomontages are provided as additional illustration.</p> <p>The 55 viewpoints were selected following consultation at the scoping and PEIR stages to represent visual receptors of varied types at different distances and directions and “<i>cover as wide a range of situations as is possible, reasonable and necessary to cover the likely significant effects</i>”, as recommended by Guidelines for Landscape and Visual Impact Assessment (LI & IEMA, 2013), paragraphs 6.20-6.21.</p>
RR-001 RR-020 RR-074 RR-136 RR-172 AS-076	<p>Cumulative impact on landscape character: Concerns raised about the cumulative effect of all the planned and consented development in the region would present a substantial risk to the landscape character at the local and regional scale.</p>	<p>Landscape and visual effects with operational and consented development are assessed in ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7] [APP-050] and some of these effects are identified as being significant (see Table 7.6). Cumulative effects with other developments in planning are considered in Section 7.9 with no new significant effects being identified.</p>
RR-098 RR-123 AS-076	<p>Glint and Glare: Concerns raised about the implication of glare from the panels to road users, pedestrians and wildlife.</p>	<p>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 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]. The locations along the roads where glare is predicted to occur are presented in Charts A16.1.19 to A16.1.33 of Annex A16.1.1 of the ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]. The</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>assessment concludes that with the mitigations that are secured, the glint and glare effects have been reduced to an acceptable level.</p> <p>A number of potential mitigation options are presented below, including but not limited to:</p> <ul style="list-style-type: none">• The use of textured glass PV panels in key areas;• Additional visual screening in the form of fencing and / or planting;• Changes to the azimuth and / or tilt angle of the PV arrays; or• Modifying the extent of the PV array areas

4.12 NOISE AND VIBRATION

4.12.1 This section addresses the issues raised in the RRs in relation to the effects from both construction and operational noise and vibration as a result of the Development.

Table 4-10 Noise and Vibration

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-042 RR-088 RR-098 RR-116	<p>General Noise Impact: Concerns raised that the noise mitigation and planting are insufficient in minimising the noise impact.</p>	<p>An assessment of noise effects is provided in ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055]. The assessment concludes that the Development would not result in a significant noise impact.</p> <p>As part of the Development design, Concept Design Parameters and Principles [EN010162/APP/7.14A] states that a 4 m high acoustic fence is included around Work Area 4 (Intermediate Substations), Work Area 5a (BESS) and Work Area 5b (400 kV Compound). Any changes to the noise emitting equipment and the location of those equipment, will be assessed through the detailed design, and where necessary mitigation implemented to ensure noise at the nearest NSRs is below the Noise Limits.</p> <p>This will be secured by requirement 15 in Schedule 2 of the Draft DCO [EN010162/APP/3.1B] which provides that no part of work numbers 1, 4, 5A, 5B, 6 or 7 may commence until an operational noise assessment containing details of how the design of the authorised development has incorporated mitigation to ensure the operational noise rating limits as set out in the environmental statement are to be complied with for the relevant work number has been submitted to and approved by NSDC.</p>
RR-121 RR-151	<p>Construction Noise: Concerns raised about the construction noise impact on wildlife, nearby communities and PRow users.</p>	<p>An assessment of noise effects from the construction phase is provided in ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055]. The assessment concludes that with the embedded design and mitigation</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>measures which are secured, the effects from noise during the construction phase are not expected to be significant on any noise-sensitive receptors.</p> <p>Section A5.3.5 of the ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A] also provides a list of mitigation measures to mitigate. Key measures include:</p> <ul style="list-style-type: none"> • The working hours (section A5.3.2) will be restricted; • Deliveries of plant and materials by HGV to site shall only take place by designated routes and within times agreed with the Council as secured in ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [APP-203] • A detailed Construction Noise Management Plan (CNMP) will be developed by the Contractor, based on the finalised location of construction activities and equipment to be used on site. <p>Requirement 12 in Schedule 2 to Draft DCO [EN010162/APP/3.1B] secures that no phase of the authorised development may commence until a construction environmental management plan for that phase has been submitted to and approved by Newark and Sherwood District Council. This must be prepared in accordance with the ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A].</p>
RR-182	<p>Operational Noise: Concerns about operational noise impact from equipment including the substation.</p>	<p>An assessment of the impact of operational noise is provided in ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055], with supporting information provided in ES Volume 4, Appendix 12.2: Noise and Vibration Modelling [EN010162/APP/6.4.12.2] [APP-271]. The assessment considers noise from electrical plant within substations, as well as noise from the BESS battery containers and inverters. Based on a worst-case scenario,</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>assuming all plant is operational simultaneously at 100% capacity, the assessment concludes that no significant effects are anticipated.</p> <p>Requirement 15 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that no part of work numbers 1, 4, 5A, 5B, 6 or 7 may commence until an operational noise assessment containing details of how the design of the authorised development has incorporated mitigation to ensure the operational noise rating limits as set out in the environmental statement are to be complied with for the relevant work number has been submitted to and approved by Newark and Sherwood District Council.</p>

4.13 PRINCIPLE OF DEVELOPMENT

4.13.1 This section addresses the issues raised in the RRs in relation to the overall need for the Proposed Development and the alternatives considered in the site selection.

Table 4-11 Principle of Development

RR References	Summary of Issue Raised in RR	Applicant’s Responses
RR-050 RR-059 RR-064 RR-065 RR-068 RR-083 RR-085 RR-087 RR-091 RR-104 RR-112 RR-116 RR-123 RR-129 RR-135 RR-136	<p>Consideration of alternative design, technologies and locations: There were concerns that alternative technologies and location (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.</p> <p>Suggestions made by the public regarding the siting of PV panels have not been adopted, and no further explanation has been provided.</p>	<p>NPS EN-1 and EN-3 both clearly establish the need for the solar development. Section 3.3.62 of NPS EN-1 confirms that there is a Critical National Priority (CNP) for the provision of nationally significant low carbon infrastructure. The delivery of a large amount of solar generation capacity is an essential element required for delivery of the Government’s energy objectives and legally binding net zero commitments. Section 2.10.10 of NPS EN-3 confirms the important role that solar needs to play in delivering the government’s goals for greater energy independence, as such, large-scale ground mounted solar schemes such as the Development are necessary. Rooftop and brownfield solar options are considered to be insufficient in scale, pace and at a viable cost to meet national targets. The need for the Development has been set out in Statement of Need [EN010162/APP/7.2] [APP-324].</p> <p>The Applicant considers that the alternatives for design and locations have been adequately assessed, as presented in ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047], with supporting figures in ES Volume 3, Figure 4.2: Site Selection – All Considerations [AS-030]. An iterative design process has been employed to optimise the Development layout since 2023 and the layout has been refined to avoid high value agricultural land and avoid any landscape designated area. Section 4.4 (Design Evolution) of ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] sets out details for a number of changes. These changes were made to the layout of the Development in response to the feedback from the EIA scoping, non-statutory consultation, statutory consultation and ongoing engagement with the local residents. Section</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-149 RR-159 RR-172 RR-178 RR-197 RR-203 RR-217 RR-219 RR-226 AS-055 AS-058 AS-059 AS-063 AS-073		<p>6.4 of the Planning Statement [EN010162/APP/5.4A] sets out how the Development complies with the policy tests for good design.</p> <p>Considering alternative technologies and design such as roof-mounted solar or other technologies is not a relevant policy requirement, other than in relation to flood risk, BMV land, compulsory acquisition, and habitat sites, all of which are considered in ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047].</p> <p>Site selection is described in Section 4.3 of ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047]. The influencing factors are summarised below:</p> <ul style="list-style-type: none"> • The availability of a grid connection, approximately 15km radius of the Staythorpe substation; • Suitable topography; • Low quality agricultural land; • Not subject to any international, national, landscape, ecological or geological designations, or to any housing allocations or heritage designations; • Low flood risk; • The ability to accommodate public rights of way crossing the Site; • Proximity to the main highway network; • Availability of land <p>Details of the alternatives considered as part of the Development's design development process are set out in Design Approach Document [EN010162/APP/5.6A]</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>The Site was also considered as part of the Sequential and Exception Test Report (Appendix C of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B]). The Sequential Test analysis demonstrates that there are no suitable and reasonably available sites appropriate for the Development in areas with a lower risk of flooding and therefore the Sequential Test is satisfied. The site selection factors are consistent with the principles for site selection set out in NPS EN-3¹², paragraphs 2.10.18 to 2.10.48 and is informed by the iterative design process.</p> <p>Further details on the Development's design development process are set out in Design Approach Document [EN010162/APP/5.6A].</p> <p>As stated in Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1] and Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2], both NCC and NSDC agree that the an appropriate number of potential alternatives have been considered and that the Development is located in a suitable location.</p> <p>As such, ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] confirms that reasonable alternatives have been studied. The Development has been adequately considered to minimise impacts balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts.</p>
<p>RR-020 RR-026 RR-032</p>	<p>Need for development: There were concerns about the purpose of the Development and the need for the development.</p>	<p>The DCO Application is accompanied by Planning Statement [EN010162/APP/5.4A] and Statement of Need [EN010162/APP/7.2] [APP-324] both of which set out the reasons why a solar PV electricity generating facility and an energy storage facility are needed in the context of the national need for renewable energy infrastructure.</p>

¹² DESNZ (2023). National Policy Statement for Renewable Energy Infrastructure (EN-3). Available at: <https://assets.publishing.service.gov.uk/media/65a7889996a5ec000d731aba/nps-renewable-energy-infrastructure-en3.pdf> [accessed on 09/06/2025].

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-146 RR-189 RR-225 RR-071 RR-150 RR-158 RR-075 RR-066 RR-218 RR-006 RR-083 RR-157 RR-180 RR-004 RR-093 RR-036 RR-009 RR-207 RR-055 RR-176 RR-087		<p>The Development benefits from an acceptance of a Grid Connection Offer to be connected to the Staythorpe Substation. This suggests that the Development can be delivered efficiently to contribute to the accelerated pace of delivery that Clean Power 2030 states is urgently required. The Development, including its provisions for associated energy storage will make a significant contribution to meeting the clear need established in current Policy by providing generation equivalent to the energy requirements of 400,000 homes. The Development will result in a net reduction in emissions by 789,292 teCO₂e, helping contribute to the UK's Net Zero targets.</p> <p>As set out within the Planning Statement [EN010162/APP/5.4A] [EN010162/APP/5.4A]:</p> <p><i>“5.2.17 Well-designed large-scale solar projects, such as the Development, are a critical part of the development of the UK’s portfolio of renewable energy generation required to decarbonise its energy supply quickly and provide secure and affordable energy supplies.”</i></p> <p>Further details of the need for the Development are provided in the Statement of Need (Planning Need) [EN010162/APP/7.2] [APP-324]. In addition to demonstrating the strategic need for renewable energy generation and storage which is embedded in legislation and national policy, the Statement of Need also explains how the Development is able to be deployed so that it can contribute to meeting this identified need.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-200 RR-206 RR-212 RR-207 RR-212 RR-218 RR-225		
RR-019 RR-031 RR-044 RR-049 RR-060 RR-067 RR-074 RR-077 RR-087 RR-104 RR-109 RR-112 RR-116 RR-118	<p>Scale of Development: There were concerns about the size of the Development, resulting in detrimental harm to the environment.</p>	<p>The Government's policy approach to renewable energy, as reflected in NPS EN-1, EN-3, EN-5 and other planning guidance, are consistent in supporting large scale ground-mounted solar schemes and consider those schemes as a Critical National Priority that need to be delivered urgently. The connection of large-scale generation facilities via high-voltage transmission systems enables the pooling of generation and demand and enables the efficient bulk transfer of power between areas with surplus and areas in deficit. This is a critical benefit of large-scale systems and supports energy security and system operability.</p> <p>As summarised in Section 4.4 of the Planning Statement [EN010162/APP/5.4A] the environmental impacts have been minimised throughout the iterative design process. This has resulted in the layout proposed in the EIA Scoping Report, the PEIR, and the recent design changes made following statutory consultation feedback, including the removal of PV panels from Flood Zone 2 and 3.</p> <p>In this context, a reduction to the scale of the Development is not considered to be a reasonable alternative, in order to maximise the energy generation potential of the Development in line with the Applicant's grid connection offer. In addition, the size and location of the Development have been carefully considered,</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-126 RR-130 RR-134 RR-151 RR-189 RR-191 RR-196 RR-198 RR-214 RR-224 AS-055 AS-067 AS-069 AS-070		balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts.

4.14 PUBLIC RIGHTS OF WAY

4.14.1 This section addresses the issues raised in the RRs in relation to effect of the Development on public rights of way (footpaths, bridleways, etc.), and where there is access to Local Wildlife Sites (LWS) and Sites of Special Scientific Interest (SSSI). The visual effects on the PRoW users is considered in Section 4.11 of this Report.

Table 4-12 Public Rights of Way

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-100 RR-200 RR-206	<p>Recreational Impact: Concerns about the loss of amenity on the PRoW users such as equestrians and cyclists.</p>	<p>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/6.2.18A] provides an assessment of the combined recreational amenity effects that may result from visual, noise, traffic, glint, and glare impacts. The assessment concludes that adverse effects have been identified on NT Sutton-on-Trent BW14 and other PRoWs intersecting the Solar PV areas. However, as these PRoWs are of local use or importance, the residual adverse effects are considered negligible and not significant in EIA terms. The majority of potential effects on PRoW and other recreation receptors were assessed as being negligible and not significant.</p> <p>The assessment also identifies beneficial effects during the operational phase on the 21 new permissive routes, which form part of the 50.6 km Circular Recreational Route. These effects were assessed as significant for only one new route due to its long-distance nature and therefore of more than local use or importance.</p>
RR-026 RR-044 RR-100	<p>PRoW Closure: Concerns raised about the loss of PRoW, especially the loss of historic route', walking and riding routes.</p>	<p>The proposed changes to the PRoWs are outlined in Section 18.6.1 of ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A], with supporting information provided in the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4] [APP-020] and ES Volume 4, Appendix A4.1: Public Right of Way Strategy [EN010162/APP/6.4.4.1] [APP-200]. Out of the 117 assessed PRoWs, eight will be fully or partially closed, with diversion in</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>place to maintain the continuity of connection to the wider PRow network. Seven of these, that currently pass through Work no. 1 Solar PV area, will be diverted during all phases. One route (NT Sutton on Trent BW14) will be diverted only during the construction and decommissioning phase. No path would be closed without an alternative or replacement being opened first.</p> <p>ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A] provides measures to manage closures, diversions, and new permissive routes. The management plan has sought to ensure continued recreational use of the PRowS during construction, operation and decommissioning of the Development.</p> <p>ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6A] sets out that the Applicant will undertake a review of PRow within the Order Limits prior to decommissioning, and in the final DRP will set out any proposals for changing PRow at that time. This could include reverting the routes of diverted PRow back to their current routes. The final DRP will be submitted to NSDC for approval prior to commencement of decommissioning.</p> <p>Proposals for closures and re-routing have been avoided where practicable. As set out on Environmental Statement Volume 3, Chapter 18 Recreation Figures [EN010162/APP/6.3.18A] [AS-048] diversions of PRowS 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. PRowS that follow tracks and hedgerows have been retained in their current positions, with the exception of NT Sutton on Trent BW14 which requires temporary diversion only during the construction and decommissioning phases.</p> <p>Requirement 18 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] secures that no phase of the authorised development may commence until a recreational routes management plan for that phase have been submitted to and approved by</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>Newark and Sherwood District Council. This must be in accordance with ES Volume 4, Appendix A18.1: oRRMP [EN010162/APP/6.4.18.1A].</p> <p>The details of decommissioning works and environmental management measures would be subject to agreement with planning authority before they commence. This is also secured through Requirement 19 in Schedule 2 to the Draft DCO [EN010162/APP/3.1B] which provides that prior to commencement of any decommissioning works for any part of the Development, a decommissioning and restoration plan must be submitted to Newark and Sherwood District Council for its approval, in consultation with Nottinghamshire County Council.</p>
RR-026	<p>PRoW Diversion: Concerns raised about the diverted routes, affecting their ability to continue using PRoW and enjoying them as recreational assets contributing towards physical and mental wellbeing.</p>	<p>Permanent PRoW diversions have been kept to a minimum and only introduced where absolutely necessary as stated above.</p> <p>As one of the socioeconomic benefits, 21 new permissive footpaths and six new permissive bridleways are proposed, totalling 32.6km in length. These will be created during the construction phase and made available for use during the operational phase. Amongst the 32.6km new permissive routes, 12.5km of new permissive route will connect to an existing 38.1km of paths, forming a 50.6km circular recreational route.</p> <p>The permissive paths and diversions will be created during the construction phase to improve the recreational amenity of the area during the operational phase of the Development. Following decommissioning, it is assumed that the proposed permissive routes will revert to private land with no public access, and that any PRoW that are diverted for the operation phase of the Development will remain diverted following decommissioning. This is subject to the detailed Decommissioning and Restoration Plan which will be provided prior to decommissioning.</p>
RR-064	<p>Proposed PRoW and/or Permissive Path enhancements:</p>	<p>The approach to PRoW diversion and re-instatement of PRoW during construction, operation, and decommissioning and beyond the Development's</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
<p>RR-096 RR-194</p>	<p>Concerns about the effectiveness of the proposed PRow enhancement in mitigating the visual effect of the Development. Concerns that the proposed route does not consider the needs of the equestrians and cyclists.</p>	<p>lifetime is outlined in ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A].</p> <p>New permissive routes have been proposed to increase the connectivity of the network during the operational phase, including 21 new permissive footpaths, and six new permissive bridleways, creating 32.6 km of new permissive route. A circular recreational route would be created around the Order Limits, covering 50.6 km, including 12.5 km of new permissive path. Walkers will be able to use the full extent of the long distance route, but cyclists and horse riders will be restricted to bridleways, BOATs, and public roads.</p> <p>ES Volume 4, Appendix A18.1: oRRMP [EN010162/APP/6.4.18.1A] sets out the management of PRow during and beyond the Development's lifetime. Concept Design Parameters and Principles [EN010162/APP/7.14A] secures that:</p> <p>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.</p> <p>New and existing hedgerows will be maintained throughout the life of the development, with new trees incorporated throughout where appropriate, screening views of panels from the route. The measures for hedgerow planting is provided in Table A5.1.3 of the ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/ 6.4.5.1A], which will be detailed in the detailed LEMP.</p>

4.15 SOCIO-ECONOMICS, TOURISM AND RECREATION

4.15.1 This section addresses the issues raised in the RRs in relation to effect of the Development on the income, education, and employment of the local and regional area.

Table 4-13 Socio-economics

RR References	Summary of Issue Raised in RR	Applicant’s Responses
RR-014 RR-028 RR-172 RR-201 RR-205 RR-206	<p>Community Benefits: Concerns about the extent to which the local communities will benefit from the Development and the compensation for the residents.</p>	<p>Socio-Economic community benefits range from employment opportunities, training, local supply chain opportunities and educational opportunities.</p> <p>The provision of a compensation is not a material consideration within the EIA assessment.</p> <p>The Applicant is committed to providing support to the community and local businesses through employment generation, supply chain benefits during construction and operation and various skills and education initiatives. Benefits are summarised in Table 13.14 of the ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13] [APP-056] and are outlined in Section A13.2.1.2 of the ES Volume 4, Appendix 13.2: Outline Skills, Supply Chain and Employment Plan (OSSCEP) [EN010162/APP/6.4.13.2] [APP-274]. Measures include:</p> <ul style="list-style-type: none"> • Providing apprenticeships during the various phases of the Development; • Providing other workforce training to employees and the local community for earlier stage Development focussed renewable industry skills through the EG (Elements Green) Academy; • Providing renewable energy education and careers through the EG Academy; • Providing local employment opportunities; and • Providing local business networking and support.

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>It is anticipated that the SSCE activities and outputs would be fully in delivery once construction has started. Effective performance monitoring will also be delivered to ensure the plan is achieving its goals and contributing to the overarching vision, and to provide relevant feedback.</p> <p>The proposed measures are secured in ES Volume 4, Appendix 13.2: OSSCEP [EN010162/APP/6.4.13.2] [APP-274]. Requirement 17 of the Draft DCO [EN010162/APP/3.1B] secures that no phase of the authorised development may commence until a skills, supply chain and employment plan in relation to that phase has been submitted to and approved by NSDC. The management plan secures that it must identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with the construction, operation and decommissioning of the authorised development, and the means for publicising such opportunities.</p>
RR-200	<p>Employment and Skills: Concerns regarding the inconsistent estimation of the number of FTE.</p>	<p>Paragraph 79 of the ES explains the use of 'person years' within the assessment, which differ from FTE jobs.</p> <p>ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13] [APP-056] sets out that an average of 120 local net direct construction full time equivalent (FTE) jobs and 60 local net direct manufacturing FTE jobs could be supported over the full two-year construction phase. It is anticipated that there will be a gain in employment equivalent to 1,204 direct local person years.</p> <p>Regarding the seven net direct FTE employees lost as a result of the change of use from agriculture, the ES Volume 2, Chapter 13: Socio-Economics and Tourism [EN010162/APP/6.2.13] [APP-056] states from paragraphs 105 to 108 that the construction phase results in a net gain of 173 direct local FTE jobs.</p>
RR-085	<p>Tourism: Concerns that changes to the natural environment and the</p>	<p>The effects of the Development on tourism are assessed in Section 13.8.5 of the ES Volume 2, Chapter 13: Socio-Economics and Tourism</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-012 AS-055	operation of commercial enterprises in proximity to the Development would significantly affect the tourist economy.	<p>[EN010162/APP/6.2.13] [APP-056]. This assesses the potential effects on tourist and recreational receptors from environmental assessments elsewhere in the Environmental Statement, concluding that the significance of the effect is considered to be Minor Adverse.</p> <p>The assessment calculates a negligible economic loss (0.0138%) for the Newark and Sherwood visitor economy due to the Proposed Development. Furthermore, the Development would have positive economic effects due to construction worker temporary accommodation demand.</p> <p>In addition, the assessment states in paragraphs 327 to 328 “The baseline assessment has found that, within the area around the Order Limits, short-term rental holiday accommodation is sparsely populated. The majority (c.89%) of the short-term holiday accommodation are situated, as seen in Figure 13.3, in locations such as Newark, Southwell, Winthorpe, Ollerton, Wellow and Edwinstowe.</p> <p>In these locations the accommodation is unlikely to be impacted by noise or visual impacts.”</p> <p>It is concluded that there will be no significantly adverse effects on the tourist economy.</p>
RR-100 RR-129 RR-130 AS-071	<p>Loss of amenity / recreation resources: Concerns about the impact on the rural lifestyle that the residents enjoy and the loss of amenity.</p>	<p>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/6.2.18A] provides an assessment of the combined recreational amenity effects that may result from visual, noise, traffic, glint, and glare impacts. The assessment concludes that adverse effects have been identified on NT Sutton-on-Trent BW14 and other PRowS intersecting the Solar PV areas. However, as these PRowS are of local use or importance, the residual adverse effects are considered negligible and not significant in EIA terms. The majority of</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>potential effects on PRow and other recreation receptors were assessed as being negligible and not significant.</p> <p>New permissive routes have been proposed to increase the connectivity of the network during the operational phase, including 21 new permissive footpaths, and six new permissive bridleways, creating 32.6 km of new permissive route. A circular recreational route would be created around the Order Limits, covering 50.6 km, including 12.5 km of new permissive path.</p>

4.16 TRAFFIC AND ACCESS

4.16.1 This section addressed the issues raised in the RRs in relation to effect of the Development on the surrounding road network to be used by construction related vehicles travelling to and from the Development, and the effect on all modes of transport users.

Table 4-14 Traffic and Access

RR References	Summary of Issue Raised in RR	Applicant’s Responses
RR-053	<p>Traffic Survey Methodology: Concerns about how the traffic volumes in A616 being calculated and sought to understand the rationale of classifying A616 as low usage road.</p>	<p>Traffic surveys and a review of traffic data were undertaken to understand the frequency and types of use of vehicles on the local road network, as presented in ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A] to inform the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057].</p> <p>The Applicant’s traffic survey data has been recorded by an experienced and independent traffic survey specialist and it was conducted in April 2024, February 2025 and March 2025. As stated in Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1], NCC as Highways Authority, has not expressed any concerns with the reliability of the traffic survey data and they have agreed with the baseline of the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057].</p>
RR-006 RR-011 RR-026 RR-028 RR-032 RR-053 RR-061	<p>Suitability of local road network for construction: Concerns regarding the increase in traffic volumes on the A616 Great North Road, A616, B1164 Great North Road and other local roads. The construction routes, such as Moorhouse Road, Coldharbour Lane, Hagg Lane, road between Caunton to Eaking, Little Carlton,</p>	<p><u>Proposed Development and Predicted Traffic Generation</u></p> <p>The traffic and access layout is presented in Streets and Access Plan – Part 1 of 4 [EN010162/APP/2.8A] [AS-007] [AS-008] [AS-009] [AS-010]. Frequency of trips of the Development is set out in Section A14.1.6 of the ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]. ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057] concludes that the effect of the increase traffic flow has been avoided where possible and otherwise minimised by careful design of the Development and the</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-066 RR-071 RR-115 RR-116 RR-121 RR-144 RR-178 RR-199 RR-200 RR-206 RR-208 RR-210 RR-218 RR-218 AS-055 AS-061 AS-067 AS-076	Kelham Lane, are unsuitable for high volume of heavy traffic.	<p>construction routes and access points. A summary of the traffic volumes changes by Development phases is provided below:</p> <ul style="list-style-type: none"> • A monthly traffic generation during the construction phase is calculated based on a worst-case scenario and is presented in Table A14.1.15 of ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]. Section 14.7.1 of the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057] states that 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. • During the operational phase, it is anticipated to be around 15 vehicles per day across the whole site for maintenance purposes. Due to the reduced traffic levels throughout the operational phase compared to the construction phase, effects on collisions and safety, severance, driver delay, pedestrian delay and amenity and hazardous loads are considered to be negligible and not significant. • The number of vehicles associated with the decommissioning phase are not anticipated to exceed the number set out for the construction phase. <p>It is considered that the 24 months estimation of the construction phase duration used for the purposes of the Environmental Impact Assessment presented in the Environmental Statement is a reasonable worst-case scenario based on the current level of information available for the Development. Details of the phasing and construction of the Development is secured in the ES Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [APP-203], which will be submitted to NCC prior to construction of the Development.</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p><u>Embedded mitigations</u></p> <p>Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] [APP-203] provides a framework for the management of construction vehicle movements to and from the Development, and secures measures to reduce vehicle trips to the Development. Mitigation measures include:</p> <ul style="list-style-type: none"> • Section A5.2.4.2 of the management plan secures measures to control timings of construction vehicle movements in avoiding peak hour travel to mitigate potential capacity constraints. • Section A5.2.4.1 of the management plan secures the ES Volume 4, Appendix 14.2: Outline Travel Plan [EN010162/APP/6.4.14.2] [APP-284] which includes measures for the provision of shuttle buses to transport construction workers to and from the Order. A detailed version of the Outline Travel Plan, is to be finalised at detailed design stage. <p>Requirement 14 in Schedule 2 of the Draft DCO [EN010162/APP/3.1B] secures that no phase of the authorised development may commence until a construction traffic management plan for that phase has been submitted to and approved by NCC. This must be in accordance with the ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [APP-203] and must be implemented as approved.</p>
<p>RR-013 RR-034 RR-035 RR-043 RR-044</p>	<p>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</p>	<p>The assessment of the effects of the Development on highway safety and disruption of access for the pedestrians, cyclists and drivers and road condition is provided in Section 14.7.1.7 Road User and Pedestrian Safety of the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057]. The assessment is supported by the collision review as presented within Section A14.1.4.9 of the ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A] and further collision records data is provided in</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
RR-066 RR-071 RR-088 RR-089 RR-093 RR-095 RR-095 RR-100 RR-102 RR-116 RR-123 RR-184 RR-209 RR-211 AS-055 AS-073	<p>risk to users (vehicles, cyclists, equestrians, pedestrians).</p> <p>Few respondents raised specifically about the use of Cold Harbour Lane as the construction access route, which is considered the sole access to six properties and could cause direct disruption to residents. There are also concerns on restricted access to the old RAF Ossington and the village of Ossington.</p>	<p>Appendix B of the ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]. The presentation of collision locations shown in ES Volume 3, Figure 14.6: Personal Injury Collision Locations [EN010162/APP/6.3.14A] [AS-046] shows that collisions in the Study Area have occurred along the A617 and A46 and to a lesser degree, the A616. A fatality was reported on Moorhouse Road.</p> <p>ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [APP-203] has been developed to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised. The measures set out are supported by the ES Volume 3, Figures: Chapter 14 Traffic and Access Figures [EN010162/APP/6.3.14A] [AS-046] and Streets and Access Plan [EN010162/APP/2.8A] [AS-007] [AS-008] [AS-009] [AS-010]. Key mitigation measures are summarised below:</p> <ul style="list-style-type: none"> • Construction of site access locations, with appropriate geometry and visibility splays; • Construction of passing places on narrow sections of roads to facilitate easier movement of two-way traffic as informed by the swept path analysis; • Construction of new permissive paths to provide separation from vehicles by avoiding the need to walk alongside roads; • Construction of internal construction tracks to avoid HGV passing through settlements such as the village of Ossington and Maplebeck; <p>Construction of routes to be used for the Abnormal Indivisible Loads associated with the transformers and delivery of cable drums;</p> <p>Provision of a detailed version of the ES Volume 4, Appendix 14.2: Outline Travel Plan [EN010162/APP/6.4.14.2] [APP-284] is to be finalised at detailed</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>design stage. This will set out separate travel-planning measures to reduce vehicle trips to the Development.</p> <p>The Applicant notes that ongoing discussions in regards to the mitigation measures have been undertaken with NCC (the Local Highway Authority) and National Highways as stated in the Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1] and Statement of Common Ground with National Highways [EN010162/APP/8.6].</p>
RR-012 RR-013 RR-020 RR-039 RR-068 RR-135 RR-142 RR-151 RR-184 RR-214	<p>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.</p>	<p>ES Volume 4, Appendix A18.1: Outline RRMP [EN010162/APP/6.4.18.1A] provides measures to manage closures, diversions, and new permissive routes. The management plan has sought to ensure continued recreational use of the PRow during construction, operation and decommissioning of the Development.</p> <p>The assessment of the effects of the Development on highway safety and disruption of access for the pedestrians, cyclists and drivers and road condition is provided in Section 14.7.1.7 Road User and Pedestrian Safety of the ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14] [APP-057]. The assessment is supported by the collision review as presented within Section A14.1.4.9 of the ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A] and further collision records data is provided in Appendix B of the ES Volume 4, Appendix 14.1: Transport Statement [EN010162/APP/6.4.14.1A]. The presentation of collision locations shown in ES Volume 3, Figure 14.6: Personal Injury Collision Locations [EN010162/APP/6.3.14A] [AS-046] shows that collisions in the Study Area have occurred along the A617 and A46 and to a lesser degree, the A616. A fatality was reported on Moorhouse Road.</p> <p>ES Volume 4, Appendix 5.2: Outline CTMP [EN010162/APP/6.4.5.2] [APP-203] has been developed to ensure that the construction phase can be undertaken in a safe and efficient manner and that disruption to the local highway network is managed and minimised. The measures set out are supported by the ES Volume</p>

RR References	Summary of Issue Raised in RR	Applicant's Responses
		<p>3, Figures: Chapter 14 Traffic and Access Figures [EN010162/APP/6.3.14A] [AS-046] and Streets and Access Plan [EN010162/APP/2.8A] [AS-007] [AS-008] [AS-009] [AS-010]. Key mitigation measures are summarised below:</p> <ul style="list-style-type: none"> • Construction of site access locations, with appropriate geometry and visibility splays; • Construction of passing places on narrow sections of roads to facilitate easier movement of two-way traffic as informed by the swept path analysis; • Construction of new permissive paths to provide separation from vehicles by avoiding the need to walk alongside roads; • Construction of internal construction tracks to avoid HGV passing through settlements such as the village of Ossington and Maplebeck; <p>Provision of a detailed version of the ES Volume 4, Appendix 14.2: Outline Travel Plan [EN010162/APP/6.4.14.2] [APP-284] is to be finalised at detailed design stage. This will set out separate travel-planning measures to reduce vehicle trips to the Development.</p> <p>The Applicant notes that ongoing discussions in regards to the mitigation measures have been undertaken with NCC (the Local Highway Authority) and National Highways as stated in the Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1] and Statement of Common Ground with National Highways [EN010162/APP/8.6].</p>

