

ExQ1 Q1.1.9 – Planning benefits

Response by; James Gamble Nottinghamshire County Councillor – Sherwood Forest Division

I do not agree that the proposed development would deliver the full range of planning benefits claimed by the Applicant, once the corrected evidence base is considered.

While the generation of renewable energy is acknowledged, other claimed benefits—particularly economic and sustainability benefits—are overstated due to inaccuracies in the Environmental Statement (ES).

The Applicant's assessment of agricultural impacts is based on materially incorrect BMV data, with a confirmed 37% under-reporting of cumulative BMV land loss. When corrected, the scale and concentration of land loss raises serious concerns about food production, agricultural resilience, and the local economy, particularly in relation to the Newark Sugar Factory supply chain.

In this context, claimed economic benefits must be weighed against:

- loss of high-quality agricultural land;
- displacement of productive cropping systems;
- risks to a nationally significant but locally concentrated food-processing facility; and
- long-term impacts on rural employment and supply chains.

In my view, the planning balance has been skewed by reliance on inaccurate baseline data. Until a corrected cumulative assessment and a proper evaluation of local agricultural economic impacts are provided, it is not possible to conclude that the benefits of the scheme clearly outweigh its harms.

Signed for and on behalf of the Nottinghamshire County Councillor – Sherwood Forest Division:

Name; James Gamble

Position; County Councillor – Sherwood Forest Division

Date; 16th January 2026

[REDACTED]

James Gamble MSc. Biodiversity Conservation

ExQ1 Q3.1.1 – BMV land during construction

Response by; James Gamble Nottinghamshire County Councillor – Sherwood Forest Division

I consider that significant effects arising from the disturbance of best and most versatile (BMV) agricultural land during the construction phase have not been adequately assessed in the Environmental Statement (ES).

As set out in my Statement of Common Ground with the Applicant, it is now agreed that the Applicant's cumulative BMV calculations are materially inaccurate. This includes a confirmed omission of 211 hectares of BMV land at Beacon Fen and the complete omission of the One Earth NSIP from the cumulative assessment. When these errors are corrected, the cumulative area of BMV land affected increases from 2,350 hectares to 3,222 hectares—an increase of 872 hectares or 37%.

This scale of under-reporting directly undermines the ES conclusions regarding the significance of effects, including during construction. Construction-related disturbance of BMV land is not neutral: soil compaction, loss of soil structure, drainage disruption, and prolonged storage of soils all carry risks that increase with scale and concentration. These effects are particularly relevant where multiple possible NSIPs are clustered within the same agricultural catchment, as is the case in Newark and Sherwood.

Given the corrected figures, I consider that the ES has failed to assess the true magnitude of construction-phase effects on BMV land, and that these effects could reasonably be significant when considered cumulatively. This applies equally to the decommissioning phase, which involves similar large-scale ground disturbance across the same land resource.

In my view, further mitigation would be required, including:

- a revised and accurate cumulative BMV baseline;
- a reassessment of construction and decommissioning impacts using that baseline; and
- clear evidence that soil handling, restoration, and monitoring measures are capable of maintaining long-term agricultural productivity across a substantially larger affected area than currently assessed.

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Position; County Councillor – Sherwood Forest Division

Date; 16th January 2026

[REDACTED]

James Gamble MSc. Biodiversity Conservation

Nottinghamshire County Council, County Hall, West Bridgeford, Nottinghamshire, NG2 7QP

ExQ1 Q3.1.3 – Economic impacts of BMV land loss

Response by; James Gamble, Nottinghamshire County Councillor – Sherwood Forest Division

Yes. I have significant concerns regarding the economic impacts of best and most versatile (BMV) agricultural land that would be temporarily and permanently lost as a result of the proposed development, particularly when assessed cumulatively.

The Applicant has characterised agricultural land loss as a national issue, but this approach fails to reflect the highly localised economic dependencies that exist within Newark and Sherwood District. Most notably, the district hosts the Newark Sugar Factory, one of only four remaining sugar beet processing facilities in the United Kingdom. This facility is a major economic anchor, supporting direct employment, agricultural contracting, haulage, and a wide supply chain.

Evidence set out in my Written Representation demonstrates that approximately 68–72% of sugar beet processed at Newark is sourced from within 25–30 miles of the factory—precisely the area experiencing a concentration of solar NSIPs, including One Earth, and Great North Road. Sugar beet production is dependent on Grade 1, Grade 2, and Grade 3a soils, all of which fall within the BMV category.

The corrected cumulative loss of 3,222 hectares of BMV land therefore represents not just a land use change, but a structural risk to a locally concentrated agricultural processing economy. The Environmental Statement (ES) does not assess:

- displacement of beet cropping;
- impacts on supply resilience to the Newark Sugar Factory;
- knock-on effects on haulage, seasonal labour, and farm incomes; or
- the risk of cumulative land loss shortening processing campaigns or undermining long-term viability.

In my view, the absence of any processor-specific or local agricultural economic assessment is a serious omission. The economic impacts of BMV land loss in this location are neither abstract nor national; they are local, concentrated, and potentially significant.

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[REDACTED]

James Gamble MSc. Biodiversity Conservation

ExQ1 Q4.1.2 – Environmental Impact Assessment (ecological methodology)

Response by; James Gamble, Nottinghamshire County Councillor – Sherwood Forest Division

Yes. I consider that the methodological concerns raised by Newark & Sherwood District Council in relation to the Environmental Impact Assessment (EIA) for ecological receptors could reasonably lead to different conclusions regarding the magnitude and significance of effects.

In particular, concerns relating to:

- aggregation of distinct habitats into broad receptor groups;
- limited transparency regarding baseline survey data; and
- reliance on professional judgement where survey coverage is incomplete

all introduce a risk of under-reporting effects at both site-specific and cumulative scales.

From an ecological perspective, the aggregation of habitats such as broadleaved woodland, native hedgerows, watercourses, and ponds reduces sensitivity within the assessment. These habitats differ markedly in ecological function, resilience, recoverability, and policy protection. Assessing them collectively risks masking impacts on higher-value or less replaceable features, particularly where mitigation is assumed rather than evidenced.

This issue mirrors concerns I have raised elsewhere in the examination regarding agricultural land classification: where baseline data are incomplete or inaccurately represented, confidence in the resulting conclusions is reduced. In both cases, conclusions of “no significant effect” are heavily dependent on the reliability of underlying inputs.

While professional judgement is an accepted component of ecological assessment, it must be supported by sufficiently robust and transparent baseline evidence. In my view, the approach taken increases the likelihood that the magnitude and significance of ecological effects—especially cumulative effects—have been understated.

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[REDACTED]

ExQ1 Q4.1.3 – Biodiversity Net Gain (BNG) assessment

Response by James Gamble, Nottinghamshire County Councillor – Sherwood Forest Division

Yes. I consider that the concerns raised by Newark & Sherwood District Council regarding baseline habitat surveys could materially affect the conclusions of the Biodiversity Net Gain (BNG) assessment.

BNG outcomes are highly sensitive to baseline condition assessments, particularly where higher-value or more complex habitats are present. Where sampling of such features is limited, or where condition assessments rely on extrapolation, the resulting BNG calculations can change significantly if additional or more detailed data are introduced.

From a postgraduate ecology perspective, I am particularly concerned where:

- baseline surveys under-represent features of higher ecological importance;
- condition scores are applied across aggregated habitat parcels; and
- mitigation and enhancement assumptions are embedded early in the calculation process.

In these circumstances, additional baseline data could reasonably result in lower starting units, higher losses, or reduced confidence in delivery, thereby altering both headline BNG percentages and the credibility of long-term outcomes.

I also note a broader consistency issue across the Environmental Statement. As with the BMV assessment—where acknowledged omissions and numerical errors led to a 37% under-reporting of cumulative impacts—the reliability of outputs is only as strong as the accuracy of inputs. Where baseline uncertainty exists, claims of high levels of net gain should be treated with caution.

In my view, further baseline clarification would be necessary before the Examining Authority can place full reliance on the BNG conclusions presented.

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[REDACTED]

James Gamble MSc. Biodiversity Conservation

ExQ1 Q9.1 – Cumulative effects and methodology

Response by; James Gamble, Nottinghamshire County Councillor – Sherwood Forest Division

I consider that the Applicant’s approach to cumulative effects is inconsistent and undermines confidence in the Environmental Statement (ES) as a whole.

The Applicant has excluded the One Earth NSIP from the cumulative BMV assessment on the basis that it was not included in the ES baseline. However, during the Issue Specific Hearing, the Applicant acknowledged that this omission was an error, as One Earth is both consented and geographically adjacent to the proposed development. The same hearing confirmed a further numerical omission of 211 hectares of BMV land at Beacon Fen.

In contrast, the Applicant has selectively included NG+ flood alleviation works within the cumulative assessment for the water environment while excluding them from other topic chapters on the basis of uncertainty. This selective approach is not methodologically robust. If uncertainty does not prevent inclusion of NG+ works for water impacts, it cannot reasonably justify exclusion of a known, consented NSIP such as One Earth from agricultural and cumulative land use assessments. The EIA Regulations require consideration of all existing, approved, or reasonably foreseeable developments, and this requirement has not been met.

As a result, cumulative impacts—particularly on BMV land and agriculture—have been materially understated, and the ES conclusions on cumulative significance cannot be relied upon without a fully corrected and consistently applied cumulative assessment.

Footnote: “NG+” refers to associated enhancement and community benefit works. Some NG+ flood alleviation measures are included in the cumulative water assessment, but NG+ is otherwise voluntary and separate from the core development baseline.

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Date; 16th January 2026

[REDACTED]

James Gamble MSc. Biodiversity Conservation