Great North Road Solar and Biodiversity Park

Draft Statement of Common Ground with Nottinghamshire County Council

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Revision History

Revision	Revision Date	Authorised By	Position	Comment
Issue 1	6/08/25	ES	Head of Planning	1st Draft for NCC Review
Issue 2	25/11/25	ES	Head of Planning	2nd Draft for NCC Review
Issue 2	7/12/25	WL	Planning and Infrastructure Manager	Response to draft SoCG
Issue 3	9/12/25	ES	Head of Planning	D1 Draft for sign off
Issue 3	10/12/25	ES	Head of Planning	Updated to reflect NCC comments
Issue 4	14/01/26	ES	Head of Planning	Update to respond to NCC LIR
Issue 5	21/01/26	ES	Head of Planning	D2 draft for NCC input
Issue 5	11/2/26	ES	Head of Planning	D3 Updates
Issue 6	17/2/26	WL	Planning and Infrastructure Manager	NCC Responses
Issue 6	17/2/26	ES	Head of Planning	D3 Draft for sign-off
Issue 7	19/3/26	ES	Head of Planning	Updates to SoCG based on discussions
Issue 8	19/3/26	WL	Planning and Infrastructure Manager	Updated to reflect NCC comments

Revision	Revision Date	Authorised By	Position	Comment
Issue 9	23/3/26	ES	Head of Planning	Updated to respond to NCC comments
Issue 10	24/3/26	WL	Planning and Infrastructure Manager	Updated to reflect NCC Transport comments

1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

1.1.1 This Statement of Common Ground (SoCG) has been prepared to support an application (the Application) for a Development Consent Order (DCO) from the Secretary of State (SoS) for Energy Security and Net Zero under Section 37 of the Planning Act 2008 (PA 2008) for the proposed Great North Road Solar and Biodiversity Park (the Development). The Application has been submitted by Elements Green Trent Limited (the Applicant).

1.1.2 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the Parties, and where agreement has not (yet) been reached.

1.1.3 SoCGs are an established means in the planning process of allowing all Parties to identify and focus on specific issues that may need to be addressed during the examination. This SoCG will be revised and updated as discussions between the Parties progress during the Examination.

1.2 PARTIES TO THIS STATEMENT OF COMMON GROUND

1.2.1 This SoCG has been prepared by (1) Elements Green Trent Limited as the Applicant and (2) Nottinghamshire County Council (NCC) (collectively, 'the Parties').

1.2.2 NCC is a host Local Authority. The Development is located within NCC's administrative area. NCC is listed as the local authority, in accordance with Section 42 of the PA 2008 and so has been consulted during the preparation of the Application and following its acceptance.

1.3 TERMINOLOGY

1.3.1 In the table in the Issues section of this SoCG:

- "Agreed" (Green) indicates where the issue has been resolved;
- "Under discussion" (Amber) indicates where a matter is the subject of ongoing discussion; and
- "Not Agreed" (Red) indicates a final position.

1.3.2 Where NCC expresses agreement, it does so only in so far as it has considered the issue with regards to its statutory remit and on the basis of the information provided by the Applicant. Agreement is offered without prejudice to the submissions of other interested parties who may have greater knowledge of technical or site-specific issues.

1.4 RECORD OF RELEVANT CORRESPONDENCE

1.4.1 The Applicant has undertaken consultation and engagement with NCC throughout the development of the Application. The Applicant consulted NCC, a local authority, in accordance with Section 42 of the PA 2008, about the Development and environmental impact assessment as part of the formal

pre-application consultation and publicity procedures. This process afforded NCC the opportunity to provide responses to the information provided at various stages of the pre-application process.

1.4.2 Appendix 1 sets out the discussions and correspondence that has taken place between the Parties to date.

1.4.3 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Parties in relation to the issues addressed in this SoCG.

2 CURRENT POSITION OF THE APPLICANT AND NCC

2.1 ECOLOGY AND BIODIVERSITY

Table 2-1 Ecology and Biodiversity

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
2.1.1	RR	Assessment Baseline for Decommissioning	**Current Position:** NCC welcomes the ongoing engagement and acknowledges that these matters are now agreed. NCC has requested that the wording of the Outline Decommissioning and Restoration Plan (ODRP) is amended such that Protected Species Licences could apply to any species, rather than being limited to those listed, to account for changes in species conservation status during the operational period. Subject to this change, the approach to decommissioning outlined within the ODRP is acceptable.	**Current Position:** The Applicant confirms that the ODRP,**ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6C],** has been updated accordingly to satisfy NCCS's request. The Applicant has continued engagement with NCC's ecology officer, understands that the ecology matters have been responded to and resolved.	Agreed
2.1.2	RR	Protected Species - Fish	**Current Position:** NCC welcomes the ongoing engagement and acknowledges that these matters are now agreed.	**Current Position:** The Applicant has continued engagement with NCC's ecology officer, and the Applicant understands	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			The oCEMP provides details of how fish will be protected and outlines that a programme of works will be undertaken outside sensitive times.	that the ecology matters have been responded to and resolved. **Deadline 2 Position:** An assessment of the effects of the Development on fish is provided in section 8.**9.4 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8]** [APP-051]. The specification of HDD and its associated mitigation are provided in section A5.3.9.4.2 of **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**[REP1-030]. The Outline CEMP includes the preferred timings of watercourse crossings to account for the presence of sensitive fish species. Requirement 12 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005] secures that no phase of the authorised development may commence until a construction environmental management plan for that phase has	

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
				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]**[REP1-030].	
2.1.3	RR	Protected Species - Breeding Birds	**Current Position:** NCC has reviewed the additional information provided and is now content on this matter. **Deadline 2 Position:** We have not had sight of the breeding bird survey results appendix and therefore will provide further comments on receipt of this information from the applicant. Our main queries prior to this are: Were specific nightjar and other crepuscular species surveys undertaken, given the sites location within Sherwood Forest ppSPA. The ES chapter claims the surveys were undertaken in line with best practice guidelines and references, but this survey methodology	**Current Position:** The Applicant notes that NCC Officers have confirmed agreement on this matter. This follows ongoing engagement since Deadline 1 to resolve this issue. **Deadline 2 Position:** The baseline studies and survey methods for breeding birds are presented in **ES Volume 4, Appendix A8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4]** [APP-217]. Section A8.4.2.2 (paragraph 24) provides justification for the survey methods and section A8.4.2.4 describes potential limitations and how these have been addressed. An assessment of the effects of the Development on breeding birds is provided in section 8.9.10 of ES	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			requires a minimum of 6 surveys, and not four which the applicant has undertaken. In addition, this survey methodology also states: "Any deviation in the number of surveys must be supported with detailed and robust justification. Additional survey effort may need to be considered for large-scale projects with the potential to have significant impacts on birds, and/or for high profile, sensitive projects". Further justification for the level of survey effort undertaken is therefore sought. The site has been assessed as regional value to breeding birds with SPI, LBAP, LWS- qualifying species and Schedule 1 WCA species recorded. Should further analysis of this be undertaken given the potential qualification of a LWS feature.	Volume 2, Chapter 8**: Ecology and Biodiversity [EN010162/APP/6.2.8]** [APP-051].	
2.1.4	RR	Invasive Species - Invasive Non-Native Species	**Current Position:** NCC has reviewed the additional information provided and is now content on this matter.	**Current Position:** The Applicant notes that NCC Officers have confirmed agreement on this matter. This follows ongoing	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			Deadline 2 Position: With the limited information provided within the reports, NCC cannot determine where the INNS are located within the order limits. Further clarification is sought from the applicant as well as a commitment to control and remove these species, as they are likely to spread both within the order limits and outside of the order limits over the 40 year lifespan of the proposals.	engagement since Deadline 1 to resolve this issue. **Deadline 2 Position:** Invasive non-native [plant] species (INNS) are considered in ES Volume 2, **Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8]** [APP-051] and scoped out of the assessment because of the effectiveness of embedded mitigation specified in section A5.3.11.12 of **ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**[REP1-031]. The long-term management and control of INNS will also be included in the Detailed Landscape and Ecological Management Plan (LEMP) and which is secured by Requirement 8 in Schedule 2 to the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005] Requirement 12 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005]	

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
				secures the Detailed CEMP. This must be prepared in accordance with the **ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3A]**[REP1-031]. The **ES Volume 4, Technical Appendices - Technical Appendix A5.1 - Outline Landscape and Ecological Management Plan (LEMP)[EN010162/APP/6.4.5.1A]**[REP1-026] will be updated at Deadline 1 to ensure that the commitment to INNS is clearer, along with the Outline CEMP which would cover works during the construction stage.	
2.1.5	RR	Invasive Species - Water Vole and American Mink	**Current Position:** NCC has reviewed the additional information provided and is now content on this matter.	**Current Position:** The Applicant notes that the NCC comment has not been updated, but understands that NCC Officers have confirmed agreement on this matter. This follows ongoing engagement since Deadline 1 to resolve this issue.	Agreed
2.1.6	RR	Watercourse crossings	**Current Position:**	**Current Position:**	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			NCC has reviewed the additional information provided and is now content on this matter. **Deadline 2 Position:** Further justification for the use of Open Trench methods needs to be sought from the applicant for the watercourses subject to this method.	The Applicant notes that NCC Officers have confirmed agreement on this matter. This follows ongoing engagement since Deadline 1 to resolve this issue.	
2.1.7	RR	oLEMP	**Current Position:** NCC welcomes the ongoing engagement and acknowledges that these matters are now agreed. **Deadline 2 Position:** Within the OLEMP a number of wildlife boxes and refugia are proposed. Given the overall scale of the order limits a total of 23 bat boxes and 21 bird boxes including 2 barn owl boxes is not considered sufficient.	**Current Position:** The Applicant notes that NCC Officers have confirmed agreement on this matter. This follows ongoing engagement since Deadline 1 to resolve this issue.	Agreed

2.2 CULTURAL HERITAGE

Table 2-2 Cultural Heritage

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
2.2.1	Section 42 Statutory Consultation in the Consultation Report	Policy Context	**Current Position:** NCC and the Applicant have had constructive ongoing discussions and the outstanding matters in relation to the oAMS and the assessment of archaeological effects have been satisfactorily addressed. NCC are therefore content that the Development is consistent with relevant NPS policy in relation to below ground heritage.	The Applicant considers that the Development is fully in accordance with national policy as set out in NPS EN-1 and NPS EN-3.	Agreed
2.2.2	Section 42 Statutory Consultation in the Consultation Report	Scope of Cultural Heritage Assessment	Noted.	The Parties agree that the scope and methodology used for assessment is appropriate, and is presented in Section 11.4 of the **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [APP-054].	Agreed
2.2.3	Section 42 Statutory Consultation in the	Scope of Cultural Heritage Assessment	Noted.	The Parties agree that the heritage receptor viewpoints used for assessment is appropriate, and is presented in Section 11.4 of the **ES**	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
	Consultation Report	(Heritage Receptor Viewpoints)		**Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [APP-054].	
2.2.4	Section 42 Statutory Consultation in the Consultation Report	Scope of Cultural Heritage Assessment (Study Area for the Assessment)	Noted.	The Parties agree that study area for the assessment is acceptable, and is presented in Section 11.4.2 the **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [APP-054]. The study area map is provided in **ES Volume 3, Figure 11.1: Archaeology and Cultural Heritage Study Area [EN0101/APP/6.3.11A]**[AS-043]	Agreed
2.2.5	Section 42 Statutory Consultation in the Consultation Report	Scope of Cultural Heritage Assessment (Identification of Sensitive Receptors)	Noted.	The sensitive receptors identified within the **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [APP-054] are agreed.	Agreed
2.2.6	RR	AMS (Trial trenching)	**Current Position:** NCC welcomes the revised version of the oAMS submitted at Deadline 3. NCC is broadly happy with the updated document. NCC has asked that a clarification be made in relation to the role of the Archaeological Clerk of works.	**Current Position** The Applicant notes NCC position. The requested change to the oAMS, has been agreed, and has been included in the Deadline 4 submission, **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation**	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			Subject to this change, this matter is agreed.	**Strategy (AMS) [EN010162/APP/6.4.11.8C]** **Deadline 3 Position:** Following further discussion with NCC after Deadline 2 the applicant has made further updates to the **ES Volume 4, Technical Appendices - Technical Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8B]**[REP3-056] to address NCC's concerns.	
2.2.7	LIR (5.1.11)	Assessment of Effects (Archaeological remains)	**Current Position** As the oAMS has now been agreed, NCC also now considers the assessment of effects can be agreed. **Deadline 3 Position:** The proposed methods for mitigation by record are suitable and appropriate. It will be critical that that any areas requiring preservation by recorded are agreed with NCC and HE and are	**Current Position:** The Applicant welcomes the updated position. **Deadline 3 Position** The **ES Volume 4, Technical Appendices - Technical Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8B]**[REP3-056] and the **ES Volume 4, Technical Appendices - Technical Appendix A5.3 – Outline**	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			clearly detailed in the AMS and have a site-specific Written Scheme of Investigation (WSI) for each intervention. We would also recommend that any areas assigned to 'preservation in situ' (A114.8.5.3) are required to have an appropriate management plan in the AMS (outlined in A11.8.8) and that these are linked to the CEMP, OEMP and DEMP.	**Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3C]**[REP3-036] have been updated at Deadline 3 to reflect NCC's comments. The Applicant understands that this matter is now capable of being agreed.	
2.2.8		Assessment of Effects (Setting of the heritage assets) [in relation to the Former RAF Ossington]	**Current Position** Please refer to Appendix 3 of this SoCG, which sets out the joint statement requested by the ExA (ExQ2 Q8.2.8). **Deadline 3 Position:** The 'Framework for the Assessment of the Significance of Effects' (Table 11.4) provides an approach that does act as a starting point for discussion about magnitude of effects and levels of harm. It places emphasis on professional judgement of 'major' and 'moderate' (for example).	**Current Position:** Please refer to Appendix 1 of this SoCG, which sets out the joint statement requested by the ExA (ExQ2 Q8.2.8). **Deadline 3 Position** With regard to RAF Ossington, the Applicant considers that the assessment presented in the ES, as based on the information available at the time the assessment was undertaken, is appropriate and proportionate. The airfield has been assessed as a non-designated heritage asset, and was accorded low or local	Under discussion

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			Paragraphs 69 – 71 provide suitable explanation of how this judgement process will deal with each heritage asset individually. There are no World Heritage Sites within the impact zone of the proposals. Of the 19 Grade I listed buildings within the 2km and additional 18 between 2 and 5km study areas, there are comments provided on the findings of the EA from NSDC regarding these. NCC agree that each of the built heritage assets within the conservation areas of Eakring, Kersall, Maplebeck and Kelham should be scoped into the assessment and looked at individually. We note that the conservation areas within the search area are not shown on Figure 11.4 and suggest Norwell should be scoped into the assessment."	significance, based on the incompleteness of its surviving infrastructure with limited above ground survival in the vicinity of the proposed Development and within the Order Limits. The applicant has given consideration to the new information presented by NCC. The applicant acknowledges that many structures associated with the former airfield survive (some now demolished, others in varying use and generally in very poor condition) within the wider environs of Ossington. However, the majority of these structures lie outside of the proposed Order Limits and at some distance from the nearest part of the proposed infrastructure and will not be subject to any direct or other impact. Many are not intervisible with each other or the area of the proposed Development, and many now are overgrown and/or surrounded by woodland. Although together they form part of the Airfield's overall significance, there are unlikely	

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			"Only selected Non-designated Heritage Assets have been included in the assessment of impacts on 'setting'. We feel strongly that the RAF Ossington and the associated built remains (including the Battle HQ, runways, Nissen Huts etc) are impacted both directly and as a consequence of significant changes to their setting. The OL and development therein falls on the NDHA and has the potential to cause substantial harm (in NPPF terms) to the significance of the WWII airfield. We note that the HER entries for this site are presently undergoing review and enhancement as a result of recently discovered information. The site inspection contribution to the scoping exercise undertaken by the applicant and subsequent investigations have to date been insufficient to fully appreciate the significance of the airfield remains.	to be any effects on their settings which would diminish their significance as individual components, and consequently no likely significance effect on the significance of the airfield as a whole. The Applicant notes that key components of the airfield, such as hangars and importantly the control tower no longer exist at the site, reducing the legibility of the airfield in the wider environs. Whilst there are some remains of concrete structures (including subsurface remains of the former "arrester" system) within the area in which panels are proposed, it is considered that any potential effects can be appropriately mitigated (either by avoidance at detailed design, or by preservation by record). The EIA assessed the potential effect as of high magnitude upon assets of low significance (as a non-designated heritage asset), the effect of which would be minor and not significant (and for which mitigation as referred to	

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
				above was possible). The Applicant considers this assessment to be valid and does not consider that the conclusions in the EIA need to be changed. (i.e., that the finding of a potential effect considered minor and not significant, prior to mitigation is appropriate). The Applicant will continue to work with NCC to seek agreement on this matter. **Deadline 2 Position:** No significant effects to heritage assets arising from change within their setting leading to a reduction in significance have been identified as part of the **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [APP-054]. Given the above, the Development is considered to be in accordance with paragraphs 2.10.107 to 2.10.119 of NPS EN-3.	
2.2.9	NCC Response to ExQ1	Approach to further Archaeological Assessment	**Current Position:** NCC welcomes the revised version of the oAMS submitted at Deadline	The Applicant notes NCC position. The requested change to the E**S Volume 4, Appendix A11.8:**	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			3. NCC is broadly happy with the updated document. NCC has asked that a clarification be made in relation to the role of the Archaeological Clerk of works. Subject to this change, this matter is agreed. **Deadline 3 Position:** We would recommend that that whole order limits be subject to non-intrusive survey and evaluation trenching at the assessment stage so that the best possible understanding of the archaeological resource be obtained and that this data feed into the design and layout of the scheme. The applicant's approach has been to undertake a full desk-based assessment, a non-intrusive geophysical survey of the majority of the order limits to identify buried remains, (as far as possible within the constraints of the technique) and a targeted trial trench evaluation based on the results of	**Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]** has been agreed, and has been included in the Deadline 4 submission.	

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			geophysical survey. They have also undertaken evaluation in some 'blank' areas to assess the effectiveness of the geophysics results. The result of the assessment is that the applicant has a reasonably good understanding of the archaeological resource in those areas that they themselves have identified as having a high potential through desk-based and non-intrusive survey. This does constitute large areas of the site but is by no means comprehensive. In our experience, there will be areas of significant archaeological remains within the order limits that have not yet been identified or characterised due to the limitations of geophysical survey techniques. This is due to inherent bias in geophysical data that favours certain types of activities and therefore periods of archaeological activity. Prehistoric activity is often underrepresented in geophysical results and is often only incidentally		

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			picked up during evaluation trenching when later activity (often Roman and medieval) is targeted. The applicant has committed to a postconsent phase of evaluation work (nonintrusive survey and trial trench evaluation) to complete the assessment and provide a more comprehensive picture of the archaeological resource within the order limits. We have some concerns on the proposed approach to this, primarily that it still proposes to target areas of geophysical results, but does not propose significant evaluation outside of that. Currently we do not accept that the outline WSI provides for an acceptable post consent scheme of assessment work, but the broad approach to mitigation work is generally agreeable and the fine detail will need to be present in the AMS prior to any construction work commencing. While we welcome the applicant's commitment to complete the assessment work, we		

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			maintain that this would be better undertaken prior to the DCO being consented and that a more detailed understanding of the mitigation requirements be obtained and factored into the overall scheme. However, we note that the SoS has recently found splitting the archaeological assessment work to be acceptable on similar schemes.		
2.2.10	NCC Response to ExQ1	Community Engagement in relation to Archaeological work	**Current Position:** As above. **Deadline 3 Position:** We very much welcome the provision for community engagement and agree that this would enhance the public value and engagement with the historic environment, contribute to placemaking and provide information to the public on the special archaeological and historic interest of the area. However, we do not believe that this will offset some of the physical effects of the	**Current Position:** The Applicant notes NCC position. The requested change to the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]** has been agreed, and has been included in the Deadline 4 submission. **Deadline 3 Position:** The Applicant has made provision for this within paragraph A11.8.7.5.1 of the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8B]**[REP3-056], setting out the	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			development, but will provide a necessary public benefit from the archaeological work. It is a valuable element of public engagement for the developer (often underutilised) and in our experience is very popular with local communities. We accept that the details for community engagement are necessarily limited at this stage, however provision should be made (in the final AMS) for lasting engagement during and after the archaeological work and post-construction through the operational lifetime of the scheme. We would not support a limited 'one off' event and the proposal should include multiple phases and a variety of public engagement techniques.	approach to heritage interpretation and community engagement. The form of the community engagement will be dependent upon the findings of the investigations. The Applicant would welcome further comments on the suggested commitments within the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8B]**[REP3-056].	

2.3 HYDROLOGY

Table 2-3 Hydrology

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
2.3.1	Section 42 Statutory Consultation in the Consultation Report	Policy Context	Noted.	The Parties agree that the Development is fully in accordance with national policy as set out in NPS EN-1 and NPS EN-3.	Agreed
2.3.2	Section 42 Statutory Consultation in the Consultation Report	Engagement with the local Flood and Water Management Team	Noted and to continue during the remainder of the examination and post consent should development consent be granted.	The Parties agree that there has been effective engagement with NCC Flood and Water Management Team on the Water Environment.	Agreed
2.3.3	Section 42 Statutory Consultation in the Consultation Report	Scope and Methodology of Water Environment Assessment	Noted.	The Parties agree that the scope and methodology of the **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]** [APP-052] is agreed.	Agreed
2.3.4	Section 42 Statutory Consultation in the Consultation Report	Design Mitigation (SuDS)	Noted. The proposed measures are sufficient for this stage in the planning process however further details should be submitted post consent to accompany the detailed design. It is acknowledged this	The Parties agree the water management measures to control surface water runoff and drain hardstanding and other structures during the construction, operation and decommissioning of the Development	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
			would be managed through the CEMP.	are appropriate. They are set out in Section 5.3.9 Pollution Prevention Plan of the **ES Volume 4, Appendix 5.3: Outline Construction Environmental Management Plan (oCEMP) [EN010162/APP/6.4.5.3A]**[REP1-030]. The detailed CEMP is secured by Requirement 12 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005]. The Applicant considers the approach and the mitigation measures set out in the oCEMP are appropriate.	
2.3.5		Assessment of Effects	Noted	No likely significant adverse effects has been identified, following the embedded measures (outlined **ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A]**[REP1-030]). in the design of the Development. Table 9.11 in **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]** [APP-052] summarises the predicted effects of the Development on water resources.	Agreed

Ref	Relevant Documents	Description of Matter	NCC's Position	Applicant's Position	Status
2.3.6	RR	Flood Risk	NCC has commissioned a consultant to review the Flood Risk Assessment (FRA) and Drainage Strategy. The details of this review will be provided in the NCC LIR. NCC has reviewed the detailed response to each recommendation provided by AECOM and confirms that these points are noted and agreed.	Please refer to Appendix 2 of this SoCG, which provides a detailed response to the AECOM note.	Agreed

2.4 MINERALS

Table 2-4 Minerals

Ref	Documents Reference	Description of Matter	NCC's Position	Applicant's Position	Status
2.4.1	Section 42 Statutory Consultation in the Consultation Report	Policy Context	Noted	The Parties agree that the Development is fully in accordance with NPS EN-1, EN-3 and EN-5.	Agreed
2.4.2	RR	Designated Sites	Noted.	As set out in Section 10.5 of **ES Volume 2, Chapter 10: Ground**	Agreed

Ref	Documents Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				Conditions and Land Contamination [EN010162/APP/6.2.10] [APP-053], no geological conservation sites have been identified within the Study Areas.	
2.4.3	RR	Assessment Methodology	NCC considers that the assessment methodology for assessing impacts on minerals by the proposed development is adequate. The applicant for the DCO has undertaken a Minerals Resource Assessment to consider the impacts on the sand and gravel and brick clay resource as well as the permitted Egmanton Oil well sites.	The Parties agree that the assessment methodology for **ES Volume 2, Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10]** [APP-053] is agreed.	Agreed
2.4.4	RR	Mitigation Measures	Noted.	**ES Volume 4, Appendix 5.3: Outline CEMP [EN010162/APP/6.4.5.3A]**[REP1-030] sets out best practice measures to ensure any environmental impacts during construction, and in terms of land contamination, are minimal. A final CEMP will be secured by Requirement 12 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005].	Agreed
2.4.5	RR	Assessment of Effects	NCC considers that the assessment work undertaken by	With respect to mineral safeguarding, the Development is of a temporary	Agreed

Ref	Documents Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			the applicant to assess the impact on minerals is sufficient and does not have any outstanding concerns.	nature and therefore does not present permanent sterilisation of the mineral resources beneath the Study Areas. With the embedded mitigation measures proposed, all effects in relation to ground conditions and land contamination would be minor adverse, or less, and not significant in terms of the EIA Regulations.	

2.5 TRAFFIC AND ACCESS

Table 2-5 Traffic and Access

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
2.5.1	Section 42 Statutory Consultation in the Consultation Report	National Policy Compliance	**Current Position:** NCC has significant concerns regarding implications of the proposed access points and passing bays on highway safety.	**Current Position:** The Applicant considers that the Development is fully in compliance with NPS EN-1, EN-3 and EN-5.	Under Discussion
2.5.2	RR	Scope and Methodology of Traffic and Access	**Current Position:** NCC considers that the updated ES Chapter 14 submitted at Deadline 2, which now includes a	Paragraph 43 of **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [APP-057] notes that '*Whilst some traffic may*	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
		Assessment (Study Area)	screening assessment of 50% of construction traffic travelling to/from the west to be sufficient to satisfy our previous comment. **Deadline 1 Position:** The Transport Assessment (TA) acknowledges that traffic will arrive from the west but states that this will be minimal. However, this is not justified and appears to be contrary to the Travel to Work Areas diagram in Figure 13.1. It is stated that assigning all traffic from the A1 provides a robust assessment, but applying the 'Rochdale Envelope' principle in this light would also suggest a requirement to test the outcome if all traffic approached from the west.	*arrive from the west, along the A617, before pursuing the permitted routes, given the location of the Development in the context of the wider road network, such movements would represent a small percentage of the traffic volumes on this road and would not be significant. The oCTMP [EN010162/APP/6.4.5.2] ensures that construction traffic will only arrive at a site access from specified direction and via route that has been included within this assessment. The key construction routes for HGV and non-HGV traffic are shown in Figure 14.2 [EN010162/APP/6.3.14.2] along with the link identification numbers used within this assessment, which are also listed in Table 14.2*'. The Applicant therefore considers that a realistic worse case assessment has been undertaken, and the controls set out within **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A]**[REP1-028] are then secured through Requirement 14 of Schedule 2 of the **Draft**	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				Development Consent Order [EN010162/APP/3.1B][REP1-005].	
2.5.3	Section 42 Statutory Consultation in the Consultation Report	Scope and Methodology of Traffic and Access Assessment (Identification of Sensitive Receptors)	Noted.	The Parties agree that the sensitive receptors of the **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [APP-057] is agreed.	Agreed
2.5.4	Section 42 Statutory Consultation in the Consultation Report	Baseline of the Traffic and Access Assessment	Noted.	The Parties agree that the baseline of the **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [APP-057] is agreed.	Agreed
2.5.5	Section 42 Statutory Consultation in the Consultation Report	Scope of Traffic Surveys	**Current Position:** The additional information provided is noted however is inadequate. Speeds have been assumed for a number of accesses. For others, the closest location is not close enough to the access point and others it appears are based on surveys from different roads.	**Current Position:** All site access drawings have been revised (Rev B) and now all drawings now include the recorded traffic speeds for the nearest location to inform the required visibility splays. These are included in **Appendix D of ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]**[REP2-071]. **Deadline 3 Position:**	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Deadline 3 Position: Speed surveys have not yet been provided for many of the accesses to establish the required visibility splays.	The Applicant considers that the scope of the traffic surveys in the **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [APP-057] is appropriate.	
2.5.6	RR	Phasing	**Current Position:** There does not appear to be any further information submitted addressing the phasing queries, which as previously set out means that there could be far greater impact than considered i.e. the Rochdale Envelope principal has not been applied. Furthermore, the locations of the phases do not appear to have been clarified as requested. **Deadline 3 Position:** NCC considers that the updated ES Chapter 14 submitted at Deadline 2, which now combines the two worst-case phases and months to be a satisfactory approach.	**Current Position:** **ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]** [REP2-066].**Appendix F** now includes a traffic flow diagram to show volumes on link and phasing. Discrepancies between traffic volumes in **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A]**[REP1-028] and those in **ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]** have now been rectified. **Deadline 3 Position:** **ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A]**[REP2-066]. has been updated to align with traffic	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			There is a discrepancy between the traffic volumes in the oCTMP and those in the TA. Traffic flow diagrams are also requested to show volumes on links. Notwithstanding the descriptive text provided, a Plan showing the location of each phase is requested. **Deadline 1 Position:** NCC has sought for clarification regarding the Phasing Requirement and whether the TA has considered the worst case scenario that the requirement could allow for.	flows within **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A]**[REP1-028] and Traffic Flow Diagrams provided at Deadline 3, along with an indicative Phasing Plan. **Deadline 1 Position:** Section 5.5.1 of **ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5]** [APP-048] notes that '*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'*. Paragraph 98 then notes the '*worst-case estimate of the construction programme, with the minimum anticipated phasing, as used for*	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				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. **ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A]**[REP2-066] has been updated to assess a combination of the two highest monthly periods of traffic from two concurrent phases. The results are presented in the updated **ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14A]**[REP2-066] remain unchanged. These phasing assumptions are then set out within **the ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A]**[REP1-028], which secures a detailed CTMP for each phase of the development. This is secured by Require 14 of the **Draft**	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				Development Consent Order [EN010162/APP/3.1B][REP1-005]. Details of the phasing of the Authorised Development are then secured by Requirement 3 of Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005]. The Applicant is therefore confident that assessment considers a realistic and robust worst-case scenario.	
2.5.7	RR	Trip Generation	**Current Position:** NCC considers that the updated ES Chapter 14 and TA submitted at Deadline 2, which now includes assessments using 30% travelling by shuttle bus, alongside a car share ratio of 1.3 to be sufficiently robust.	The Applicant considers the trip generation calculations for the most concentrated phase for traffic generation is appropriate and has outlined the phasing that will be used during the construction period to deliver the Development. The Applicant will have full control of who can access the Site, to the extent that only workers travelling by a vehicle needed for their trade, such as transit vans/trucks containing tools, being allowed on-site. These commitments are then set out in the **Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A]** [REP1-	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				028] and further details set out in the Detailed CTMP secured by Requirement 14 of Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005].	
2.5.8	RR	Accesses	**Current Position:** We disagree that the information provided gives comfort to the HA in regard to their safe operation. Whilst this can be managed in the construction phases, the operational phase introduces the need for a convoluted management plan which NCC considers to be unreasonable and also require banksmen to cross highway at locations where there is restricted visibility (and in areas where the required visibility has not been properly demonstrated due to no or disassociated speed surveys). The drawings provided therefore evidence that the majority of splays will be intensive to manage during the construction phase and the works to maintain them during	**Current Position:** The Applicant has revised all site access drawings (Rev B) in **ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]**[REP2-066] and have supplemented this information with a summary table that sets out for each access: • Access location and whether it is an existing access or new, and if it is permanent or temporary. • The width of the site access, the volume of daily traffic in the peak month, the type of vehicles and the permitted movements. • The design speed and visibility requirements, and the achievable visibility • The proposed mitigation measures during construction	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			this phase will encourage vigorous growth and density which will further decrease visibility in the operational phase. Whilst many of these are framed as 'existing' their use will be intensified when compared to agricultural use and they will be used by non-agricultural vehicles in which the drivers are not positioned to be able to see over hedges (i.e. drivers of tractors). There are also splays which are not achievable in either the construction or the operational phases due to them falling outside of the DCO boundary (PA05/SA08) Furthermore, there are highway safety concerns which do not relate to visibility but arise from interaction with the surrounding network. In the case of PA01, the access is located on the A617 in close proximity to a signal-controlled junction. This	and operation, if required, to ensure the access can operate safely. The Applicant considers that the revised drawings and summary table now provide sufficient comfort to NCC that each site access can operate in a safe and efficient manner and that the design principal of each access can be agreed to allow Road Safety Audits to be conducted as part of the detailed design stage. **Deadline 3 Position:** The Applicant has discussed this item with NCC and is compiling the additional information. The Applicant continues to engage with NCC regarding how Road Safety Audits are secured post DCO. **Deadline 2 Position:** The Access Routes Hierarchy is shown in **ES Volume 3, Figure 5.1: Works Areas [EN010162/APP/ 6.3.5B]**[REP1-022]. The Site Access locations are then shown at **ES Volume 3, Figure 14.4: Site Access Locations**	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			creates a risk that drivers approaching on a green signal will not anticipate vehicles ahead slowing or stopping to turn into the access. The visibility splays of both PA07/PA08 fall across laybys and as such, if vehicles were parked in here the visibility would be obstructed. The accesses on the A617 and the A616 fall on the Nottinghamshire 'resilient network' which are considered to form part of NCCs major road network, falling just below trunk road category and are therefore of significant importance. It is therefore considered key that such proposals are demonstrated to be acceptable prior to determination, and yet both have matters of concern. The design principal is therefore not accepted by NCC.	**[EN010162/APP/6.3.14A]**[AS-046] and **ES Volume 3, Figure 14.5: Passing Place Locations [EN010162/APP/6.3.14A]**[AS-046] . **ES Volume 4, Appendix A14.1: Transport Statement Appendix D [EN010162/APP/6.4.14.1A]**[REP2-071]provides the site access designs, including their form, key dimensions and demonstrates their suitability through swept path analysis of the largest anticipated HGV entering and exiting each respective location. This analysis of the construction access points confirms that they can be designed to meet relevant design standards. The Applicant will engage with NCC (the Local Highway Authority) to provide any further information, including the timing of Road Safety Audits.	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Deadline 3 Position: Whilst NCC has held positive discussions with the Applicant on this item and progress is being made, information is still under discussion. **Deadline 1 Position:** No consideration to the form of access appears to have been given. The traffic information supplied identifies that a number of the accesses trigger the requirement in DMRB CD123 for further assessment, during both the construction and operational phase. Where only occurring in the construction phase, mitigation in the form of traffic management may be acceptable, but locations where this would be required should be identified. Information regarding the number of HGVs at each access was requested, and whilst information in Appendix F provides a breakdown, it is difficult to link the		

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			accesses in here to those described elsewhere and therefore clarity is required. Whilst a statement is made that the access drawings are outline drawings and detailed designs will be forthcoming at the appropriate time, the principle of acceptability needs to be established. There are a number of accesses, either proposed or amended (with increased usage) which have apparent highway safety concerns. All new or amended accesses should therefore be subject to a Stage 1 Road Safety Audit, as required by the Nottinghamshire Highway Design Guide, to inform this process.		
5.4.23	LIR	Road Safety Audits	**Current Position :** The Nottinghamshire Highway Design Guide is considered to apply in respect to Road Safety Audits. It states that the Design Manual for Roads and Bridges (DMRB) applies to any road falling outside of its scope. The applicable standards under which	**Current Position :** The **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A]**[REP1-028] sets out that Road Safety Audits would be prepared for each construction access point being brought into use. Where necessary, site-specific traffic	Under discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			to consider all roads on which the new and amended accesses are proposed is therefore DMRB and GG119 of DMRB covers the requirements for Road Safety Audits. It is applicable to all physical changes to the highway, including temporary measures lasting more than 6 months. Visibility splays are considered fundamental to highway safety and therefore are a material consideration for decision makers. A significant number of the proposed accesses, whether framed by the applicant as primary or secondary, fall below the required standards. The OCTMP includes road safety audits at detailed design, which is not the appropriate stage to determine suitable locations for accesses. The operational management plan introduces the need for a convoluted plan to use the accesses where visibility is inadequate, which NCC consider to be unreasonable and also	management measures will be put in place to ensure that they are safe during construction and if necessary, operation (via the Detailed Operational Environmental Management Plan. This would include measures such as temporary speed reductions, stop/go boards, temporary traffic signals, road marshals, signage and other types of warning signs	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			require banksmen to cross highway at locations where there is restricted visibility **Deadline 3 Position:** Whilst a statement is made that the access drawings are outline drawings and detailed designs will be forthcoming at the appropriate time, NCCs view is that the principle of acceptability needs to be established at this stage. There are a number of accesses, either proposed or amended (with increased usage) which have apparent highway safety concerns. The Nottinghamshire Highway Design Guide (NHDG) states that all new accesses or where there is an increase in use of existing accesses will be supported where there is not a road safety problem of where a road safety problem can be removed (Part 1.2 of the NHDG).		
2.5.9	RR	Passing Places	**Current Position:** The applicant has discussed this with NCC but has not provided	**Current Position:** The Applicant has discussed this item further with NCC and additional text is	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			any drawings showing the intervisilbity of passing places. The drawings in Appendix E are not dimensioned. However, from visual inspection of the drawings, there are numerous locations where intervisibility is compromised. Insufficient information is provided on the distance between proposed passing places, basing this on text within the TA rather than illustrating on drawings. Notwithstanding this there are a number of places described within the TA where the passing places exceed the required 200m separation distance. **Deadline 3 Position:** The general approach to passing places is agreed, however further justification is required for locations where intervisibility cannot be achieved on single lane roads.	now provided in Section A14.5.5.6 of **ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]**that specifically considers the passing places where intervisibility is not achieved to provide justification for their suitability. **Deadline 3 Position:** A further commentary on intervisibility on single-lane roads has been added in **ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]**. The Applicant has no objection to the passing places being retained permanently, with NCC assuming responsibility for their maintenance following 12 months post-completion of the Development of the phase for which they serve. **Deadline 2 Position:** The proposed passing places are shown on **Streets and Access Plan** [EN010162/APP/2.8A],[AS-007],[AS-008],[AS-009],[AS-010], and then	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			NCC require all passing places to be permanent. The Applicant would be responsible for their maintenance and the repair of any defects for 12 months post-construction completion. NCC would then assume responsibility. **Deadline 1 Position:** It is requested that the applicant provide clear information on where both the existing and proposed passing places referred to are, in conjunction with evidence on spacing. To assist, NCC consider the standards set out in 'HS2 Rural Road Design Criteria' to be suitable to apply here.	described in Schedule 4 (Alterations to Streets) of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005]. **ES Volume 4, Appendix A14.1: Transport Statement Appendix E [EN010162/APP/6.4.14.1A]** provides the passing place designs, including their key dimensions and demonstrates their suitability through the use of swept path analysis. With regard to the access works, Article 16 of the Deadline 1 Draft DCO provides that "*The undertaker may, for the purposes of the authorised development—* *(a) form and lay out the permanent means of access, or improve existing means of access, in the approximate locations specified in Part 1 (permanent means of access to works) of Schedule 6 (access to works);* *(b) form and lay out the temporary means of access in the approximate location specified in Part 2 (temporary means of access to works) of Schedule 6 (access to works); and*	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				(c) with the approval of the highway authority, form and lay out such other means of access or improve existing means of access, at such locations within the Order limits as the undertaker reasonably requires for the purposes of the authorised development." It is considered that these are appropriate mechanisms by which to control the street works that may be required in order to deliver the Project.	
2.5.10		Mitigation Measures	**Current Position** TBC	**Current Position**TBC **Deadline 3 Position:** The Applicant considers the measures that are set out within **ES Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan** (**oCTMP) [EN010162/APP/6.4.5.2A]** [REP1-028] and **ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A]**[REP1-036] are appropriate. **ES Volume 4, Appendix 5.2: oCTMP [EN010162/APP/6.4.5.2A]**[REP1-028] will be used as a basis for the final CTMP to be submitted for approval to	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				NSDC in consultation with NCC and National Highways. The detailed CTMP will be secured by Requirement 14 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005]. **ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan [EN010162/APP/6.4.5.6A]**[REP1-036] includes provision for the final DRP to include a Decommissioning Traffic Management Plan (DTMP). The detailed DRP will be secured by Requirement 19 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005].	
2.5.11		Assessment of Effects	**Current Position:** TBC	**Current Position:** The Applicant considers that the effects associated with traffic movements during construction and decommissioning is short term and temporary. 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	Under discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				loads are considered to be negligible and not significant. Therefore, the Applicant considers that the effects associated with traffic movements on the environmental receptors are acceptable. This is set out in **ES Volume 2, Chapter 14: Traffic and Access [EN010162/APP/6.2.14]** [APP-057]**.**	
2.5.12	RR	Other Matters – Access Drawings	**Current Position:** Please see response to 2.5.8 **Deadline 3 Position:** NCC has received additional access drawings from the Applicant that seek to address previous comments. These drawings are still being reviewed and we continue to liaise with the Applicant. **Deadline 1 Position:** There are a number of access drawings referred to in the DCO where the full extents of highway where works are required is not identified. The applicant should	**Current Position:** The Applicant has revised all site access drawings (Rev B) in **ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]** and have supplemented this information with a summary table that sets out for each access: • Access location and whether it is an existing access or new, and if it is permanent or temporary. • The width of the site access, the volume of daily traffic in the peak month, the type of vehicles and the permitted movements.	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			acquire details of the highway boundary and ensure that the drawings are adequate. Furthermore, it appears that all accesses where works are required are not listed in the schedules. We would also expect drawings to cover all works required such as vegetation management for visibility splays. Please note that the size of the drawings is such that opening simultaneously with related documents, manipulating and measuring of the drawings is difficult. It would be helpful to split them further.	• The design speed and visibility requirements, and the achievable visibility • The proposed mitigation measures during construction and operation, if required, to ensure the access can operate safely. • The Applicant considers that the revised drawings and summary table now provide sufficient comfort to NCC that each site access can operate in a safe and efficient manner. **Deadline 3 Position:** Additional information has been provided to NCC and we continue to work towards agreement on outstanding matters. **Deadline 1 Position:** **ES Volume 4, Appendix A14.1: Transport Statement Appendix D[EN010162/APP/6.4.14.1A]**[REP2-66] provides the site access designs, including their form, key dimensions	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				and demonstrates their suitability through swept path analysis of the largest anticipated HGV entering and exiting each respective location. The Applicant considers that this is an appropriate level of design to allow NCC (the Local Highway Authority) to confirm that they are acceptable in principle.	
5.4.24	LIR	Access visibility splays	**Current Position:** Please see response to 2.5.8. **Deadline 3 Position:** NCC has received additional access drawings from the Applicant with visibility splays shown. These drawings are still being reviewed and a further meeting has been held with the Applicant to discuss these drawings. **Deadline 1 Position:** Visibility splays are not shown on all accesses, and forward visibility (over 1.5x SSD) is not shown on	**Current Position:** The Applicant has revised all site access drawings (Rev B) in **ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1A]**[REP2-66] **Deadline 3 Position:** The Applicant has issued NCC with access drawings presented at an increased scale and further visibility splay information. The Applicant has discussed these with NCC and will submit formally at Deadline 3. **Deadline 2 Position:**	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			any, meaning that it is unclear whether visibility can be achieved either within highway or within the order limits. These should be established to identify areas where splays are required to be cleared and then maintained, not just during construction but also operational phases, particularly if they fall outside of the highway boundary. These may also require removal of hedgerows. There is a concern that there appear to be a number junctions where splays would fall outside of the DCO extents and therefore it is unclear what powers the applicant would have to clear or maintain them.	Access visibility splays and forward visibility splays are now shown on the drawings.	

2.6 PUBLIC RIGHTS OF WAY (PROW)

Table 2-6 Public Rights of Way (PRoW)

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
2.6.1	Section 42 Statutory Consultation in the Consultation Report	Scope of the Recreation Assessment	Noted	The Parties agree that the Recreation Assessment considers the PRoW impact. As such, the scope for the Recreation Assessment is agreed, as presented in **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**[REP1-020].	Agreed
2.6.2	Section 42 Statutory Consultation in the Consultation Report	Baseline Survey	Noted.	The Parties agree that the baseline survey as set out in **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**[REP1-020] is agreed. There are 117 PRoWs within the Recreation Study Area, as listed in Table 18.4 of the **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**[REP1-020]. These PRoWs are made up of 95 FP, 18 BW, three BOATs and one RBs. There is one LDF within the Recreation Study Area. The Robin Hood Way is a 107-mile LDF which partially passes through the edges of the Order Limits around the south-eastern extent of the village of Eakring.	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
2.6.3	Section 42 Statutory Consultation in the Consultation Report	Impacted PRoWs	Noted.	As set out in **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**[REP1-020], out of the 117 identified PRoW, eight will be diverted (using seven diversion routes) during all phases and one will be diverted only during the construction and decommissioning phase, as described in Table 18.6 of the ES Chapter. 21 new permissive footpaths and six new permissive bridleways have been proposed and will be created during the construction phase so that they are open for use during the operational phase. A new circular recreational route has been proposed, covering 50.6 km, including 38.1 km of existing paths and 12.5 km of new permissive route, as described in Table 18.7 of the **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**[REP1-020].	Agreed
2.6.4	TBC	PRoW Management Measures (PRoW Buffer)	Noted	The Applicant considers that the width of PRoW will not be impacted as a result of the development. As secured in the **Concept Design Parameters and Principles [EN010162/APP/7.14A]**[REP1-046],	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				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. The minimum legal width of existing PRoWs will also be maintained. 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 5.1: Outline LEMP [EN010162/APP/ 6.4.5.1A]**[REP1-025], which will be detailed in the detailed LEMP. The detailed LEMP is secured by Requirement 8 in Schedule 2 of the **Draft Development Consent Order[EN010162/APP/3.1B]**[REP1-005].	
2.6.5	RR	PRoW Management Measures (PRoW Diversions)	**Current Position:** The Applicant has engaged further with NCC to address the issues raised. Subject to the revised DCO and Public Right of Way Diversions and Permissive Routes Plan being submitted at	**Current Position:** The Applicant and NCC have held a number of constructive conversations on this matter and the Applicant has agreed to make a number of minor changes to the description of the PRoW diversions and included some additional details on the **Public Right**	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Deadline 4, the approach to managing diversions is agreed.	**of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4B]**. These amendments have been discussed with NCC and agreed. Updates to both the DCO and the **Public Right of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4B]** are included within our Deadline 4 submission.	
2.6.6		PRoW Management Measures (Temporary PRoW Closure)	**Current position:** The Applicant has engaged further with NCC to address the issues raised. Subject to the revision to the DCO and the Public Right of Way Diversions and Permissive Routes Plan to be submitted at Deadline 4, the approach to closures is agreed.	**Current Position:** The Applicant and NCC have held a number of constructive conversations on this matter and the Applicant has agreed to make a number of minor changes to the description of the PRoW diversions and included some additional details on the **Public Right of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4B]**. These amendments have been discussed with NCC and agreed. Updates to both the DCO and the **Public Right of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4B]** are included within our Deadline 4 submission.	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
2.6.7		PRoW Management Measures (New Permissive Routes)	Accepted	The Applicant considers the management of new permissive routes are appropriate, as set out in the **ES Volume 4, Appendix 18.1: Outline RRMP [EN010162/APP/6.4.18.1A]**[REP1-042]. The Applicant will install and maintain the proposed permissive routes for the lifetime of the Development. At decommissioning, the proposed permissive routes could revert to private land with no public access, which is set out in **ES Volume 4, Appendix 5.6 Outline DRP [EN010162/APP/6.4.5.6A]**[REP1-036].	Agreed
2.6.8	RR	Draft DCO, Article 14 (As built PRoW details)	**Current Position:** NCC confirm they have reviewed the Applicant's response to this matter and are content that this is agreed.	**Current Position:** The Applicant notes that NCC Officers have confirmed agreement on this matter. This follows ongoing engagement since Deadline 1 to resolve this issue.	Agreed
2.6.9	RR	Recreational Route Management (Definitions of Public Rights of Way)	**Current Position:** NCC confirm they have reviewed the Applicant's response to this matter and are content that this is agreed.	**Current Position:** The Applicant notes that NCC Officers have confirmed agreement on this matter. This follows ongoing	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				engagement since Deadline 1 to resolve this issue.	
2.6.10		PRoW surfacing	Noted	The Applicant considers the approach to any new surfacing is appropriate. Any new surfacing would be set out within **ES Volume 4, Appendix 18.1: Outline RRMP [EN010162/APP/6.4.18.1A]**[REP1-042]. The detailed RRMP will be submitted for approval to Newark and Sherwood District Council in consultation with NCC, prior to implementation. The commitment is secured In Requirement 18 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005].	Agreed
2.6.11		Assessment of Effects (PRoW)	This is assessed by NSDC's Landscape Consultant. Noted and appreciated	Effects on Public Rights of Way and Permissive Routes are described and assessed in **ES Volume 2, Chapter 18: Recreation [EN010162/APP/6.2.18A]**. Visual effects on users of Public Rights of Way are assessed in **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN010162/APP/6.2.7]** [APP-050].	N/A

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				The majority of potential effects on PRoW and other recreation receptors were 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. **ES Volume 4, Appendix 18.1: Outline RRMP [EN010162/APP/6.4.18.1A]**[REP1-042] has sought to ensure continued recreational use of the PRoWs during construction, operation and decommissioning of the Development. The detailed RRMP will be secured In Requirement 18 in Schedule 2 of the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005]. As such, the Applicant considers the Development is fully in compliance with the policies set out in both NPS EN-1 and NPS EN-3.	

2.7 WASTE

Table 2-7 Waste

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
2.7.1	Section 42 Statutory Consultation in the Consultation Report	Policy Context	Noted.	**ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16]** [APP-059] has had appropriate regard to relevant planning policies. The Parties agree that the Development is fully in compliance with the saved Policies from the Nottinghamshire and Nottingham Waste Local Plan (adopted 2002) and Nottinghamshire and Nottingham Waste Core Strategy (adopted 2013). The policies are set out within the **Planning Statement [EN010162/APP/5.4A]**[REP1-018] and **ES Volume 2, Chapter 6**: **Planning Policy [EN010162/APP/6.2.6]**[APP-049].	Agreed
2.7.2	Section 42 Statutory Consultation in the Consultation Report	Waste Management	Noted.	The waste management measures for construction, operation and decommissioning phases are outlined in the Site Waste Management Plan (SWMP), secured through the **ES Volume 4, Appendix 5.3: Outline CEMP**	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				[EN010162/APP/6.4.5.3A][REP1-030], **ES Volume 4, Appendix 5.5: Outline OEMP [EN010162/APP/6.4.5.5A]**[REP1-034], and **ES Volume 4, Appendix 5.6: Outline DRP [EN010162/APP/6.4.5.6A]**[REP1-036]. The Applicant has considered opportunities to minimise waste as far as possible through measures set out within the management plans.	
2.7.3	RR	Assessment Methodology	**Current Position:** NCC notes the commitment to providing details of waste arisings during operation in order to assist with waste planning. This would help mitigate the risk that capacity to recycle solar panels is not developed and responds to the concerns raised by NCC below regarding landfill capacity. **Deadline 3 Position**: NCC would prefer the Applicant to undertake an assessment of the 'worst case scenario' in which waste at the decommissioning	**Current Position:** The Applicant and NCC have held a number of constructive discussions and the Outline OEMP,**ES Volume 4, Appendix A5.5: Outline Operation Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5D],** has been updated for Deadline 4. This includes a new Section A5.5.10, Waste Forecasting. Included a commitment to 5-yearly report to NCC setting out the anticipated waste streams over the following 5-year period (types and volumes/weights) and how/where that waste is expected to be disposed of, throughout the operational phase.	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			phase could not be recycled, in order to highlight the potential adverse impact upon landfill if capacity to enable the recovery of solar panels is not developed. As highlighted in the Nottinghamshire and Nottingham Waste Local Plan, landfill capacity is becoming scarce and the potential for future capacity in Nottinghamshire is limited. However, it is acknowledged that this would not have a material impact upon the overall conclusions of assessment because the Applicant maintains that such a scenario is unrealistic. NCC does not necessarily object to this principle, as we would support the recycling of material, but maintains that the solar industry should assume responsibility to promote the development of recycling facilities and should work proactively with the Waste Planning Authority in order to mitigate the risk that	**Deadline 3 Position:** The Applicant notes that NCC have confirmed that the Applicant's view that it would be unrealistic to assume a scenario where waste at decommissioning could not be recycled. The **ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6B]**[REP3-042] includes a commitment that all materials are expected to be reused, recycled or have their energy recovered, in accordance with the waste hierarchy. A further commitment is included at paragraph 92 to share details of the expected principal waste streams with the County Council in advance of the decommissioning stage to help inform the waste needs assessment process. This is then secured by Requirement 19 of the draft DCO. The Applicant notes that NCC have suggested that the information submitted for One Earth would respond to this matter. This information is already presented in the Applicant's	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			capacity to recycle solar panels is not developed. Therefore, to overcome this concern, NCC requests that the Applicant commits to providing details of expected waste arisings, and of their proposed fate, from operation and decommissioning within the OEMP and DEMP, as well as a commitment to provide an annual planning maintenance schedule via the Outline CEMP. It is considered that data and reporting on waste types and volumes will support regional waste planning and ensure waste mitigation measures are updated throughout the operational phase. These commitments were applied in relation to the One Earth Solar Farm NSIP. Please refer to 6.21 Appendix 2.3 Materials and Waste Impact Assessment (paragraph 1.9.21[1])	assessment and can be found in Tables 16.9 and 16.10 of **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16]** [APP-059]. The Applicant will seek a further meeting with NCC to seek agreement on this point. Deadline 2 Response: PV panels, inverters, BESS and transformers are all electrical equipment, and the PV support structures are metal. Many manufacturers already offer schemes to reuse and recycle these components. Given the scale of deployment of solar, it is entirely reasonable to assume that the majority of this equipment will be recycled or reused following decommissioning. This is consistent with how all large scale solar projects are being assessed. It is therefore considered that the waste arisings during the decommissioning presented in the **ES Volume 2, Chapter 16: Miscellaneous Issues**	

[1] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010159-001149-6.21.1%20Appendix%202.3%20Materials%20and%20Waste%20Impact%20Assessment%20(tracked).pdf

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				[EN010162/APP/6.2.16] [APP-059] is a reasonable worst-case scenario, and the assessment uses the IEMA's guidance on Materials and Waste in Environmental Impact Assessment (2020). As noted in paragraph 235 of **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16]** [APP-059], "The waste assessment for Gate Burton Energy Park (PINS Project Reference EN010131, document EN010131/APP/8.33), set out why a meaningful assessment of potential waste arisings against existing landfill capacity is not possible." **ES Volume 2, Chapter 16: Miscellaneous Issues [EN010162/APP/6.2.16]** [APP-059] does not assume an ability to add further capacity to landfill. As noted in paragraph 236, the Nottinghamshire and Nottingham Waste Needs Assessment makes the prediction that there will be no capacity for any further CD&E waste before the end of the plan period (which is 2038, 30 years earlier than the Development's expected	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				decommissioning date). The only reasonable assumption (based on NCC's document) is therefore that either additional capacity will be made available, or alternatives to landfill will be developed to meet capacity. It would be consistent with recent practice, waste policy and sustainable development for alternatives to landfill to be developed to meet capacity, and this is what has been assumed in ES Chapter 16. As such, the Applicant considers that the waste assessment methodology and mitigation measures are appropriate. There would be unlikely to be any adverse impacts on existing waste facilities.	

2.8 DEVELOPMENT CONSENT ORDER (DCO)

Table 2-8 Development Consent Order

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
6.2.	LIR	General	The County Council is the Local Highway Authority (LHA) for the order limits of the proposed project.	This is noted.	N/A

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			The following comments are made with respect to PART 3 of the Draft DCO (STREETS).		
6.3	LIR	Part 3 – Streets	Article 10 allows the undertaker to perform street works on any of the streets specified in Schedule 3, subject to the NCC Permit Scheme Order 2020. This will ensure the LHA is able retain coordination and control of road works to reduce disruption for road users.	This is noted.	Agreed
6.4	LIR	Part 3 – Streets	**Current Position:** NCC's position remains that technical approval for any works to the adopted highway should be secured prior to construction of those works and that this process should be cost neutral to the Highway Authority. It is noted that the technical approval process is to be secured via the Outline CTMP, but reference to covering the cost of providing such approvals pursuant to the CTMP has not been included. As below, NCC refers to the Outline CTMP for Springwell Solar Project which specifically confirms the Applicant will reimburse the highway	**Current Position:** The Applicant and NCC are continuing to discuss this matter. The Applicant remains of the view that importing the S278 cost model in the format suggested would not be appropriate for the project, or consistent with recently made DCOs. The Applicant is continuing discussions on this point and will report on progress and Deadline 5. **Deadline 2 Position:** Schedule 4 sets out the streets that are to be permanently altered (Part 1) and temporarily altered (Part 2) by	Under discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			authorities for the technical approval process. **Deadline 3 Position:** NCC's preference is for a standalone requirement which requires the technical approval detail to be submitted prior to the highway work being undertaken. However, if the technical approval process is to be secured within the Outline CTMP then we would request that this document explains how the cost of the technical process will be covered. This should be in accordance with the fee procedure applied to S278. NCC would refer the Applicant to the Outline CTMP for Springwell Solar Project: "The Applicant will reimburse the highway authorities for the technical approval process at the time the applications are made, in line with costs for similar Section 278 or Section 184 applications made under the Highways Act" REP4 028	reference to the streets and access plans **[EN010162/APP/2.8]**[APP-024][APP-025], this includes the temporary passing places. This Schedule relates to Articles 11 (Power to alter layout, etc., of streets) and 12 (Construction and maintenance of altered streets) and sets out where the streets are publicly or privately maintained. Further information on passing places is now provided in the TA in Section A14.1.5.6. The Outline CTMP was updated at Deadline 2 to allow NCC to have technical approval of the detailed design. This is then secured by Requirement 14.	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Deadline 1 Position: Article 11 allows the undertaker to carry out alterations or works to any of the streets specified in Schedule 4. Please note that the alterations described in Schedule 4 are not currently agreed because the transport assessment methodology is yet to be agreed (see Section 5.4). Furthermore, NCC would require such works to be subject to full technical approval from the street authority with the costs to the street authority to be covered by the undertaker.		
6.5	LIR	Part 3 – Streets	**Current Position:** NCC will review the updated DCO after Deadline 4. **Deadline 3 Position**: Schedule 4 Part 2 (Temporary Alteration of Layout) refers to temporary passing places – these should be permanent and therefore included at Part 1 (Permanent Alteration of Layout).	**Current Position:** The Applicant has updated the DCO,**Draft Development Consent Order [EN010162/APP/3.1E]**, at Deadline 4 to reflect this position. **Deadline 3 Position**: The Applicant has discussed this matter with NCC, and has agreed that the passing places can be retained. This has been set out in the Deadline 3 version of the Draft DCO,**Draft Development Consent**	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				Order [EN010162/APP/3.1D][REP3-005]	
6.6	LIR	Part 3 – Streets	Article 12 states that alterations to each of the streets specified in Schedule 4 would be completed to the reasonable satisfaction of the street authority. This is agreed to be necessary.	Noted	Agreed
6.7	LIR	Part 3 – Streets	**Current Position:** NCC is presently reviewing the information which has been provided but remains concerned that a significant number of the proposed accesses fall below the required visibility standards and/or create a risk for highway safety on the surrounding major road network (A617/A616). NCC does not believe that the DCO should authorise construction of the accesses listed at Schedule 6 until the fundamental visibility issues have been addressed and a Stage 1 Road Safety Audit has been provided for PA1 **Deadline 3 Position**:	**Current Position:** The Applicant has updated the access drawings and these are currently being reviewed by NCC. The Applicant considers that the revised details are capable of agreement. **Deadline 3 Position**: Article 16 was drafted before it had been determined that there were to be no specified temporary means of access. As such, article 16(b) has been deleted, as has the reference to Part 1 of Schedule 6. The Applicant is seeking to discuss NCC's request for further information on the access junctions and will provide an update in due course.	Under discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Article 16 allows the undertaker to form and lay out temporary and permanent means of access at the locations described at Schedule 6. The proposed accesses are not currently agreed, as explained at Section 5.4. Furthermore, such works should be subject to full technical approval from the street authority with the costs to the street authority to be covered by the undertaker. Please note that Article 16 refers to Part 1 (permanent access) and Part 2 (temporary access) of Schedule 6, but Schedule 6 appears to be a single entity with no parts.		
6.8	LIR	Part 3 – Streets	**Current Position:** NCC understands that the plan and statement to be provided in relation to a permanent diversion must follow a prescribed format and any new public right of way must be completed to the satisfaction of the street authority. **Deadline 3 Position**:	**Current Position:** This matter has been discussed between the Applicant and NCC and this has now been agreed. No changes are necessary. **Deadline 3 Position**: Article 14(5) sets out that the plans and statement of modifications lodged are deemed to be an order modifying the definitive map and statement made	Agreed.

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Article 13 allows the undertaker to temporarily close the PROWs described in Schedule 5. It is noted that this would be subject to first consulting the street authority. Where a PROW is to be permanently closed under Article 14, Paragraph 4 and 5 states that the diversion order shall provide enough detail for the surveying authority (NCC) to modify the definitive map of rights of way. The specific details of the information required must be clarified – this could be set out within the oCTMP or oPROWMP.	under section 53(3)(a) of the Wildlife and Countryside Act 1981. As such, the plan and statement must accord with the Act and any Regulations made thereunder, namely The Wildlife and Countryside (Definitive Maps and Statements) Regulations 1993. The 1993 Regulations specify the form a modification order must take (Regulation 4), with the detail being set out in Schedule 2 to the 1993 Regulations. As such, the applicant does not consider that the DCO requires amendment in this respect and please note that this follows precedent DCO drafting. Details of changes to PRoW can be seen on the **Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4A]**[REP2-004].	
6.9	LIR	Part 3 – Streets	**Current Position:** NCC welcomes the update to the Outline CTMP to clarify this point, and subject to this amendment being submitted at Deadline 4, NCC consider this point resolved.	**Current Position:** Please refer to Section A5.2.6.3 of the Outline CTMP. This matter has been discussed between the Applicant and NCC and this has now been agreed. **Deadline 3 Position**:	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Deadline 3 Position: Article 17 allows the undertaker to temporarily place traffic signs and signals in the extents of the road as described in Schedule 8 and to impose traffic regulation measures, with the written consent of the traffic authority. NCC would seek clarity on the proposed procedure for consultation and approval of any TTRO and recommend that this is agreed with NCC and described within the oCTMP. Whilst the requirement to publish the proposed measure in one or more local newspaper is noted, it is standard practice within Nottinghamshire for a bulletin to be issued to relevant stakeholders. NCC would request the cooperation of the undertaker in this respect, by either directly issuing the bulletin itself or by supplying the dates/times, locations and diversions and contact numbers for the LHA to issue a 'roadworks bulletin'.	The Applicant notes this point. It suggests that the commitment to notify relevant stakeholders is set out within the **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2B]**[REP2-048]. A commitment to this effect has been added to the Deadline 2 version of the Outline CTMP, but the Applicant would welcome further discussion with NCC on this matter.	
6.10	LIR	Schedule 1 (Authorised Development)	**Current Position:** TBC	**Current Position:**	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Deadline 3 Position: In addition, Schedule 1 (Authorised Development) describes the works (i.e., 'Works No.8') to facilitate access to Work Nos. 1 to 7. This includes creation of accesses, creation and maintenance of visibility splays, works to widen and surface existing highways, and making passing places. It is unclear if Works No.8 could be delivered within the order limits as the visibility splays are not drawn and as such the extents to which the maintenance is required is unknown. As the DCO only confers powers within the order limits, it is unclear under what powers the visibility splays would be maintained, should they exceed the order limits. This same principle also applies to the widening of carriageways as without swept paths it is not known what maintenance is required and whether this is achievable within the order limits.	This matter has been discussed between the Applicant and NCC and this has now been agreed. Deadline 3 Position: Access visibility splays and forward visibility splays have been added to the relevant drawings and are included in the Applicant's Deadline 2 submission.	
6.14	LIR	Schedule 14 – Procedure for	NCC notes that where an application to discharge a requirement is made a fee is to apply and must be paid to the relevant discharging authority for	The Applicant agrees to this and has updated this in the Deadline 2 version	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
		Discharge of Requirements	each application. It is noted that in relation to those requirements where NCC would be the relevant planning authority, a fee of £2535 applies for the first application for each requirement. This includes 7 (fire safety management), 10 (surface and foul water drainage), 14 (construction traffic management plan) and 18 (recreational enhancements and routes). NCC would request this fee also applies to 11 (archaeology) given the scale of work involved and considers the proposed fee of £145 to be too low for this requirement. The costs to the council should be adequately covered and the fees should be index linked from the date of the DCO.	of **Draft Development Consent Order [EN010162/APP/3.1C]**[REP2-005].	
2.9.1 / 6.15	Section 42 Statutory Consultation in the Consultation Report	Schedule 14 (Procedure for discharge)	**Deadline 3 Position:** NCC considers that notification of a decision within 10 weeks as a standard approach is insufficient. NCC is particularly concerned with the resourcing of such requirements and therefore consider that a more appropriate default period equating to Major Environment Impact	**Current Position:** The Applicant and NCC are continuing to discuss this matter. and will report on progress and Deadline 5. **Deadline 3 Position**: The Applicant notes that the Helios DCO includes a period of 8 weeks,	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Assessment development for a planning application of 16 weeks is more appropriate. Whilst NCC note that Schedule 14 includes for the ability to agree an alternate period, the expectation for 10 weeks would be set by its inclusion in the standard wording. The project is significant in size and scale and the information submitted for many of the requirements is likely to involve a significant amount of information and an appropriate time period must be afforded for NCC to consider this, including time to consult with other relevant organisations. This issue would be compounded by the combination of other NSIP projects within the county, should they gain development consent. These projects follow a similar timeline and will place cumulative pressure on the statutory functions of the planning department.	which reflects the urgent need for the project. The Applicant and NSDC have continued to engage on this matter and NSDC consider that notification of a decision within 10 weeks as a standard approach is insufficient. Schedule 14(2) of the **Draft Development Consent Order [EN010162/APP/3.1D]**[REP3-004] sets out the procedure for discharge of requirements. Once an application is submitted for such an approval, the authority must respond within a period of eight weeks beginning with the day immediately following that on which the application is received by the relevant authority. The Applicant's view is that the Helios DCO, and Stonestreet Green DCO, provide relevant and up to date precedent where a period of 8 weeks is considered reasonable and appropriate.	
6.16	ISH2 and ISH3	Schedule 14 (Fees)	**ISH3 Position** If the requirement is included at Schedule 2, NCC would recommend	**Current position** The Applicant notes NCC's request for amendments to Schedule 14 and the	Under Discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			that Schedule 14 (Procedure for Discharge of Requirements) is also modified to include the text in bold below to ensure that an appropriate fee is applied to the discharge of the proposed requirement: Where an application is made to the relevant authority for consent, agreement or approval in respect of a requirement only, a fee is to be paid to that relevant authority for each application. (2) The fee payable for each application under sub-paragraph (1) is as follows… (a) a fee of £2,535 for the first application for the discharge of each of the requirements… (b) a fee of £578 for each subsequent application for the discharge of each of the requirements listed in paragraph (a)… (c) a fee of £145 for any application for the discharge of…. **(d) a fee of £3000 or 10% of the cost of the highway works to be approved under any application**	Applicant continues to discuss this matter with NCC. The Applicant maintains that incorporating a fee mechanism equivalent to the Section 278 or Section 184 processes into Schedule 14 would not be appropriate for this project, nor consistent with the approach taken in recently made DCOs. The Applicant considers the fee provisions already included in the Draft DCO to be appropriate and proportionate. The Applicant has clarified that the fees payable to discharge a Requirement would apply to the Technical Approval submissions made pursuant to the commitment set out in the **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2D],** (See Schedule 2, Part 2, paragraph 5(c)(iii).	

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			for the discharge of requirement X (detailed highway approval) whichever is the highest'.		

2.9 DCO SCHEDULE 2: REQUIREMENTS

Table 2-9 DCO Schedule 2: Requirements

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
6.11	LIR	Schedule 2 – Requirements	It is noted that the 'county authority' is the discharging authority for several of the requirements in Schedule 2 including: Fire Safety Management (7) (via Nottinghamshire FRS), Archaeology (11) and Construction Traffic Management Plan (14).	Noted	N/A
6.12	LIR	Schedule 2 – Requirements	NCC recommends that it is also responsible for discharging Surface and Foul Water Drainage (10), in its capacity as the Lead Local Flood Authority, and	The Applicant agrees to this and has updated this in the Deadline 2 version of **Draft Development Consent Order [EN010162/APP/3.1C]**[REP2-005]**.**	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			Recreational Enhancement and Routes (18), in its capacity as the Local Highway Authority which is responsible for management of the Public Rights of Way (PRoW) impacted by the project. It is understood that in all other cases the district 'planning authority' would be the discharging authority. NCC may wish to comment further on the wording of the requirements during the examination.		
6.13	LIR	Schedule 2 – Requirements	**Current Position:** NCC has considered this further and confirms that any successor authority (such as a new unitary) would assume all of the statutory functions, rights and liabilities of the abolished Councils and therefore there is no need to amend the draft DCO to specifically address potential local government reorganisation. **Deadline 2 Position:** In Nottinghamshire, proposals are being developed to reorganise local government which, if	Noted and agreed.	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			implemented, would result in a single tier of local government. Therefore, the dDCO should enable any of the requirements in Schedule 2 to be discharged by a superseding local authority, if necessary.		
2.10.1	Section 42 Statutory Consultation in the Consultation Report	Schedule 2(1) - Interpretation	Noted	Requirement 1 (Interpretation) in Schedule 2 in the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005] refers to Nottinghamshire County Council as the county authority for the authorised development; and Newark and Sherwood District Council as the planning authority for the authorised development.	Agreed
2.10.2	Section 42 Statutory Consultation in the Consultation Report	Schedule 2(7) - Fire Safety Management	Noted	The Parties agree that the Requirement 7 (Fire Safety Management) in Schedule 2 in the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005] is appropriate. The requirement secures that no part of Work No. 5A comprising any part of a battery energy storage system may commence until a fire safety management plan ("FSMP") has been submitted to and approved by	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
				NCC, such approval to be in consultation with the Nottinghamshire Fire and Rescue Service and the Environment Agency.	
2.10.3	Section 42 Statutory Consultation in the Consultation Report	Schedule 2(10) - Surface and Foul Water Drainage	Noted	The Parties agree that the Requirement 10 (Surface and Foul Water Drainage) in Schedule 2 in the **Draft Development Consent Order [EN010162/APP/3.1B]**[REP1-005] is appropriate. The requirement secures that no phase of the authorised development may commence until details of the surface water drainage strategy (including the results of the infiltration testing) and (if any) foul water drainage system (including means of pollution control) for that phase (which shall be substantially in accordance with the flood risk assessment) have been submitted to and approved by the planning authority, such approval to be in consultation with NCC, internal drainage board, the Environment Agency and Severn Trent Water (in respect of its sewerage undertaker functions).	Agreed
2.10.4	Section 42 Statutory	Schedule 2(11) - Archaeology	**Current Position:**	**Current Position:**	Agreed

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
	Consultation in the Consultation Report		NCC have reviewed the draft requirement and are content that this is suitable.	The Applicant and NCC have discussed this matter and have agreed to the wording set out within the Deadline 4 Draft DCO.	
2.10.5	ISH2 and ISH3	Schedule 2: Highway approval wording	**ISH3 Position:** NCC acknowledged that the Applicant has updated the Outline CTMP to include specific wording which would require the developer to set out how it will obtain technical approvals for any works to the adopted highway. However, NCC maintains that this should be detailed in a standalone requirement for greater transparency and certainty, given that Requirement 14 only requires the Applicant to submit a CTMP which is "substantially in accordance with" the Outline CTMP and therefore provides scope for this process to be diluted post consent when the CTMP is submitted to the HA for approval. Following the hearing, NCC has drafted the following requirement	**Current Position:** The Applicant maintains that the approach set out within the **ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2D]** for securing the detailed detail of the site access drawings is both appropriate and consistent with recently made DCOs. The Applicant is willing to discuss this matter further with NCC, but does not consider that a requirement of the nature suggested in appropriate or necessary.	Under discussion

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			for inclusion at Schedule 2: (X) Detailed highway approval 1. No construction works shall be undertaken in the adopted public highway until the detailed design of those works has been submitted to and approved in writing by the county authority including: a. A programme for the works, details of the construction method and traffic management requirements; b. A detailed design pack of drawings and specifications detailing the works and any service / utility works that may need to be accommodated, informed by additional surveys including topographical surveys and additional speed survey data; c. The necessary health and safety information required under the Construction,		

Ref	Document Reference	Description of Matter	NCC's Position	Applicant's Position	Status
			(Design & Management) Regulations, or their equivalent at the point of submission; d. Details of the proposed contractor, including their insurance provisions; e. If required by the county authority the appropriate stage Road Safety Audit (RSA) f. Details of any necessary road signage and road markings; and g. Details of any proposed remediation proposals should the works not be permanent. (2) The authorised development must be carried out in accordance with the approved details.		

3 SIGNATURES

3.1.1 The above SoCG is agreed between the Applicant and Nottinghamshire County Council, as specified below.

Duly authorised for and on behalf of **Elements Green Trent Ltd**	Name Job Title Date Signature
Duly authorised for and on behalf of **Nottinghamshire County Council**	Name Job Title Date Signature

Appendix 1: Record of Correspondence

Date	Type (meeting, etc.)	Topic
12.10.2023	Email	Applicant sent Introduction meeting request.
23.10.2023	Email	Applicant sent Introduction meeting reminder.
11.1.2024	Email	Applicant sent Phase 1 Consultation- invite to private briefing.
16.1.2024	Email	Applicant sent Phase 1 Consultation Launch.
29.1.2024	Email	Applicant sent Phase 1 Consultation events invite (first week).
05.02.2024	Email	Applicant sent Phase 1 Consultation events invite (second week).
29.05.2024	Email	Applicant sent Close of Phase 1 Consultation email.
07.03.2024	Email	Applicant sent Highways Introduction meeting request
13.03.2024	Email	Applicant sent Highways Introduction meeting reminder.
13.03.2024	Email	NCC Highways request dates for meeting and provide details for traffic surveys
19.03.2024	Email	Applicant sent dates for Highways Introduction meeting
19.03.2024	Email	NCC Highways availability for meeting
28.03.2024	Email	Applicant sent Visual amenity changes update.
02.04.2024	Email	Applicant sent dates for Highways Introduction meeting
10.04.2024	Email	Applicant sent Highways Introduction meeting reminder.
26.04.2024	Email	Applicant sent Solar Farm Open Day- Save the date.
28.05.2024	Email	Applicant sent Highways Introduction meeting reminder.
10.06.2024	Email	Applicant sent Highways Introduction meeting reminder, available dates and traffic calculations spreadsheet
20.06.2024	Email	Applicant sent Highways Introduction meeting reminder and traffic calculations spreadsheet

Date	Type (meeting, etc.)	Topic
24.06.2024	Email	Applicant sent Highways Introduction meeting reminder.
27.06.2024	Email	NCC Highways advise of availability for meeting
03.07.2024	Online Meeting	NCC Highways introduction to the Development and general approach to traffic studies
07.07.2024	Email	Applicant sent copy of Highways Meeting Note
26.07.2024	Email	Applicant discussed the site accesses and road traffic collision data with NCC.
29.07.2024	Email	Applicant enquires about the purchase of road traffic collision data.
29.07.2024	Email	NCC respond with link to website and online form for purchase of road traffic collision data.
29.07.2024	Email	Applicant sent study area for road traffic collision data to NCC
30.07.2024	Email	Applicant sent Draft Statement of Community Consultation (SOCC) email.
02.08.2024	Email	Applicant provided details on the study area for road traffic collision data in response to NCC's request.
06.08.2024	Email	Applicant sent Phase 1 Consultation Summary Report.
07.08.2024	Email	Applicant sent New Supplier Account Set-up Form to NCC.
15.08.2024	Email	Applicant sent details of proposed site access location and passing places
18.10.2024	Email	Applicant sent Phase 2 Timescale Update.
19.12.2024	Email	Applicant sent Phase 2 Consultation SOCC Communication.
07.01.2025	Email	Applicant sent Phase 2 Consultation Pre-Event Briefing Invites.
09.01.2025	Email	Applicant sent Phase 2 Consultation launch and S42 email.
10.02.2025	Email	Applicant sent Highways meeting request
20.02.2025	Email	Receipt of NCC Consultation Response.
25.02.2025	Email	Applicant sent Close of Phase 2 Consultation.
26.02.2025	Email	Applicant sent Early Adequacy of Consultation Milestone Document to NCC for review and comment.

Date	Type (meeting, etc.)	Topic
05.03.2025	Email	Applicant provided details of passing places.
06.03.2025	Email	NCC responded to Applicant and confirmed fees for purchasing traffic count data and sent a plan of junctions.
12.03.2025	Email	Applicant requested update on additional PRoW feedback.
13.03.2025	Email	NCC requested further mapping and further detail from Applicant.
17.03.2025	Meeting	Applicant discussed information with NCC in relation to PEIR order limits and PRoW details. Different PRoW datasets explained in detail on the call. Applicant provide additional data and information to NCC.
25.03.2025	Email	Applicant provided Flood Management Update Newsletter.
26.03.2025	Email	NCC Response to Early Adequacy of Consultation Milestone Document.
01.04.2025	Meeting	Meeting to discuss updates to the PRoW changes and clarified on dataset information. Applicant clarified on RoW query.
04.04.2025	Email	Applicant sent through PRoW layers: 1. Proposed permissive footpaths 2. Proposed permissive bridleways 3. PRoW diversions (removal of the existing PRoW) 4. PRoW changes (proposed new route of the PRoW) Applicant listed and illustrated the 7 PRoW diversions within the scheme.
08.05.2025	Email	Applicant informed NCC of further a proposed temporary diversion during construction.
16.04.2025	Online Meeting	NCC Highways given overview of consultation comments, scheme changes since PEIR, passing places, temporary road closures, SOCG and programme to submission
02.05.2025	Email	Applicant sent Targeted Consultation Guidance Note to NCC.
08.05.2025	Email	Applicant sent Targeted Consultation Launch Emails.
19.05.2025	Email	Applicant requested road traffic collision data from NCC for the study area.

Date	Type (meeting, etc.)	Topic
21.05.2025	Email	NCC sent road traffic collision data
12.06.2025	Email	NCC responded with comments: Clarified only 5 routes being changed as other changes are accommodated on original and current routes. Requested width and management of corridors to safeguard routes remaining open. Clarified all changes would be permanent as there is no ability for a temporary diversion. Re-provided comments on: • Widths • Design • Surface • Permanent diversion/extinguishment • Temporary closures • Buffer zones • Permissive path • structures
06.06.2025	Email	NCC response to Targeted Consultation.
24.07.2025	Virtual Call	Development update call discussing next steps, resourcing, and the principles of the SoCG. The parties agreed on the approach to SoCG and that the Applicant will be authoring the drafts.
27/08/2025	Virtual Meeting	Initial discussion on the Statement of Common Ground
13/11/2025	Virtual Meeting	Discussion in relation to key matters raised in the NSDC's Relevant Representative Responses.
2/11/25	Email	Issue 2 provided by Applicant to NCC for comment.
7/12/25	Email	NCC comments on Draft SoCG

Date	Type (meeting, etc.)	Topic
9/12/25	Email	Applicant issued updated SoCG for NCC sign-off
10/12/25	Email	NCC signed off draft SoCG, including revision to the hydrogy section.
06/01/2026	Online meeting	Discussion on traffic and access related matters raised within the Local Impact Report
15/1/26	Email	Applicant issued updated SoCG for NCC sign-off
15/1/26	Email	NCC signed off draft SoCG.
21/1/26	Email	Applicant issued updated D2 SoCG for NCC review and input. No response was provided
25/01/25	Email	Informal issue of transport related documents submitted by the Applicant for Deadline 2.
09/02/26	Email	Informal issue of pack of site access drawings at enlarged scale and additional visibility information
10/02/26	Online meeting	Discussion on traffic and access related matters raised during ISH3.
12/2/26	Email	Applicant provided further updates to the SoCG, and sought NCC comments.
13/2/26	Online meeting	The Applicant and NCC discussed the draft SoCG. The Applicant sought to clarify statements made by NCC in relation to the accuracy of the SoCG. The outstanding waste comment was discussed, with the Applicant highlighting the discrepancy in approach by NCC between One Earth and GNR. The Applicant issued a meeting note after the meeting which NCC agreed.

Date	Type (meeting, etc.)	Topic
17/2/26	Email	Applicant issued the D3 final draft for NCC feedback.
18/2/26	Email	NCC signed off the SoCG for D3 submission, subject to a minor change to 2.6.5, which the Applicant has made in the final D3 version.
13/3/26	Online Meeting	The Applicant and NCC discussed the draft SoCG. NCCs PRoW officer attended the meeting and confirmed the status of PRoW matters that remained outstanding.
18/3/26	Online Meeting	An online meeting was held between the Applicant and NCC to agree the wording of the oAMS and Requirement 11.
18/3/26	Email	The Applicant shared a draft statement in relation to 'ExQ2 Q9.2.1 Update on cumulative effects'
19/3/26	Email	The Applicant issued D4 final draft for NCC feedback
23/3/26	Email	NCC issued updates to the draft SoCG to the applicant. NCC also confirmed the Applicant's position on 'ExQ2 Q9.2.1 Update on cumulative effects'.
23/3/26	Email	The Applicant shared updates to the oAMS and Requirement 11 to reflect NCC feedback.
23/3/26	Email	NCC issued updated comments on the SoCG.
233/26	Email	The Applicant provided updated response to latest NCC comments.
24/3/26	Email	NCC issue updated comments on their transport position.

Appendix 2: Response to AECOM Drainage Strategy Comments

Subject	Summary	Comment	Recommendation	Response
Stakeholder Consultation	It is noted within the Flood Risk Assessment that the Environment Agency (EA) and Nottinghamshire County Council (NCC), in its role as Lead Local Flood Authority (LLFA), were consulted during the preparation of the assessment. However, the documentation of this consultation is limited. While Appendix A includes some correspondence with the EA, no detailed meeting records are provided, and no minutes of consultation with the LLFA are included.	The stakeholder consultation presented in the FRA is limited, making it difficult to fully assess the extent and content of correspondence undertaken. The Trent Valley Internal Drainage Board (TVIDB) is referenced in Appendix A as having management responsibilities within part of the study area, yet no evidence of direct consultation with the TVIDB has been presented in the report.	The FRA should include the referenced meeting minutes from consultation with the LLFA and the Environment Agency, and evidence of direct consultation with the Trent Valley Internal Drainage Board (TVIDB) should also be provided. This is vital to ensure design parameters have been adhered to such as climate change allowances.	Appendix E of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A]outlines consultation undertaken and how this has influenced the assessment. The Applicant notes that a meeting between the EA and NSDC took place on the 14th August 2024 where both the EA and NSDC confirmed solar farms have no effect on runoff.
Constraints	The report summarises the principal constraints:	The assessment of constraints is broadly sound and identifies the key physical characteristics of the site. Land levels fall gradually eastwards towards the River Trent, with the lowest ground adjacent to the floodplain and higher ground across the main development area. Much of the site lies within Flood Zone 1, though areas closer to the Trent fall within Flood Zones 2 and 3 and are protected by embankments. The underlying Mercia Mudstone provides low permeability conditions, confirmed by infiltration testing, meaning that reliance on infiltration drainage is not appropriate. There is evidence of localised pluvial flooding linked to the poor infiltration capacity of the soils.	No recommendations	
	• Topography: The site lies to the west of the River Trent and extends across a wide area from Staythorpe in the south to Weston in the north. While parts of the site are close to the Trent, much of it is set back from the river. Ground levels are lowest adjacent to the Trent, around 6.85 m AOD, and rise gradually to the west, where the majority of the development area is located. The River Trent is bordered by naturally higher ground and engineered embankments that act as flood defences.			

Subject	Summary	Comment	Recommendation	Response
	• Geology: Infiltration testing results show that the site is underlain by the mercia mudstone group, comprising predominantly red mudstones with occasional green- grey mudstones, siltstones, and localised halite-bearing units. No superficial deposits are recorded across the site. Ground investigations identified a thin layer of topsoil (approximately 0.25–0.35 m) over firm, reddish- brown or mottled silty clay derived from weathered mudstone. In places, the clay is very gravelly, with occasional weak mudstone fragments encountered at depth. Overall, the geology indicates low permeability ground conditions. • Hydrology: The site generally drains eastwards toward the River Trent and its tributaries, though much of the development area lies away from the immediate river corridor. Approximately 90% of the site is within Flood Zone 1, with the remaining areas falling within Flood Zones 2 and 3. Along this stretch, the River Trent is contained by naturally elevated ground and engineered flood embankments. Localised pluvial flooding			

Subject	Summary	Comment	Recommendation	Response
	has also been recorded within the catchment, reflecting the low permeability of the underlying soils and the reliance on surface water conveyance.			
Existing drainage	The FRA does not explicitly describe how the site currently drains	The document doesn't state how this site drains; this could be due to the size and spread of this site. It would be useful to have a section on any existing drainage infrastructure such as culverts, outfalls, or other drainage assets. There is no mention any interaction with the proposed infrastructure and existing drainage features. Given the rural setting, it is unlikely that existing infrastructure would prevent the drainage strategy from being implemented as proposed.	Provide details of existing drainage across the site including BESS's, Substation etc	As noted within the response, the Development is unlikely to interact with existing infrastructure such as culverts. Section 9.4.7 Surface Hydrology of **ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9]** [APP-052] outlines the drainage features across the Core Study Area (CSA), based on the Order limits.
Flood Risk	The majority of the site (around 90%) lies within Flood Zone 1 and is therefore at low risk of fluvial or tidal flooding. Limited areas along the eastern edge, closer to the River Trent, extend into Flood Zones 2 and 3, but no new above ground infrastructure (solar PV, substations, BESS) is proposed in these higher-risk areas. The agreed design fluvial event is the 1 in 100 year flood (1% AEP) with a 23% climate change allowance (Higher Central uplift for essential infrastructure in the 2050s epoch), with the FRA adopting a 30% allowance as a conservative proxy in the absence	The flood risk assessment considers all relevant sources of flooding, each of which is addressed and discussed in the flood risk section of the report.	Recommendations are summarised below:	
		The FRA makes use of Environment Agency RoFSW mapping and targeted 2D pluvial modelling for certain communities, but it does not include a full site wide direct rainfall model across the PV fields. In addition, no sensitivity testing has been undertaken for longer duration storm events (e.g. 6 or 12 hours). A high level, site wide pluvial modelling exercise would provide additional confidence that localised flow routes or ponding have not been	A full site wide hydraulic model should be carried out to assess flood risk across the entire development. This will give a better understanding of how water flows across the site and help identify any combined or cumulative flood risks.	As outlined in Section A9.1.1.8 Pluvial Flooding of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A], 2D pluvial hydraulic modelling has been undertaken for areas within the CSA which the Development could interact with. Storm durations used in modelling reflect the nature of the catchment have been assessed. As the CSA is predominantly rural, the peak 1 % AEP

Subject	Summary	Comment	Recommendation	Response
	of EA model outputs	overlooked.		event has been assessed in accordance with the parameters outlined within the Table in Section 4.2.1 of the EA's What is the Risk of Flooding from Surface Water map? Report. The results (extent and depth of flooding) of the pluvial modelling across the Site are presented in Figure A9.7 within Appendix D of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A]. Additionally, Figure A9.5 - 1 % AEP Pluvial Flood Extents within Appendix D of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] shows the 1 % AEP pluvial event across the CSA and is derived from the EA's pluvial flood depth datasets (Risk of Flooding from Surface Water 2025). The 2D modelling provides a good correlation with the EA's modelling and feedback from residents during consultation meetings confirmed the flow pathways from the modelling represented observed flooding during named storms, such as Storm Babet (2023). As such, there is confidence that the Development has been designed appropriately.
	The Tidal Trent modelling shows the site would remain safe under the 0.5% AEP tidal flood and breach scenarios, with no flooding expected during the scheme's lifetime. Only a small part of Work Area 3 (mitigation land) would be affected in the extreme 1% AEP +	The FRA only assessed tidal defence breach and did not consider the implications of a fluvial defence breach.	The applicant should include an assessment of a fluvial defence breach scenario to provide a more complete understanding of flood risk to the site.	The fluvial breach would be similar to that of Flood Zones 2 and 3, which do not account for the presence of flood defences. Therefore the Flood Map for Planning is a good indicator for the fluvial breach scenario as it models flood extent with an absence of defences.

Subject	Summary	Comment	Recommendation	Response
	62% climate change scenario, with shallow flooding up to 0.6 m, which is acceptable as this land will be managed as grassland. No operational areas of the development fall within the tidal flood extents. Flood Zone 3b (functional floodplain) has been defined using the defended 1 in 30 year event (3.33% AEP), which shows that all proposed above-ground infrastructure lies outside this extent. Residual risk from a breach of the River Trent defences has been modelled and would affect parts of the mitigation land only, with no critical infrastructure at risk. Surface water flood risk is low, with most predicted pluvial depths less than 0.3–0.5 m, and infrastructure such as PV arrays, substations, and the BESS raised above these levels. Groundwater risk has been classed as negligible, with boreholes striking groundwater at shallow depths but no evidence of persistent emergence. Reservoir breach flooding is largely confined to the River Trent corridor and poses only a very low residual risk, while sewer flood risk has been scoped out given the rural setting. Overall, the flood risk to the site is low, with only limited areas of mitigation land affected during extreme fluvial or tidal events. Operational infrastructure is	It is difficult to understand the overall flood risk to the site due to the absence of appropriately scaled flood mapping. The current drawings do not provide a clear overview of flood extents throughout the site. As a result, the summary appears disjointed and there is an increased risk of misinterpretation when assessing individual sections in isolation.	The applicant should provide mapping at more appropriate extents for review, such as at a scale of approximately 1:30,000 on A3. This will enable a more robust assessment of the overall flood risk to the site.	Inset maps of flood extents within ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] have now been re-produced within Appendix D at a scale of 1:30,000 at A1, showing a clear overview of flood extents throughout the CSA.
		It is not clear from the report what is actually proposed within the development area. No proposed layout or design drawings have been provided for the identified work areas, making it difficult to understand the nature and extent of the proposed works. As a result, it is not possible to determine the potential flood risk associated with the development.	The applicant should include clear drawings showing what is proposed in each work area. This will help to understand the development and assess any potential flood risk.	The Development has Work Areas and does not have a detailed design at this stage. The Work Areas follow a Rochdale Envelope approach, common on most DCO applications, and enables a worst-case scenario to be assessed. Environmental Statement Figure 5.4 Illustrative Design shows the illustrative layout of the Development and a detailed design of the Development will been progressed and finalised, following the issue of the DCO. Appendix D of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] provides flood extent mapping that contains the proposed Work Areas at a scale of 1:30,000 on A1.
		There is no mention of compensatory flood storage within the report. This is particularly important in the substation area, where existing floodplain storage will be lost due to the proposed works.	The applicant should include an assessment of compensatory storage requirements across the site, especially for the substation area, to ensure that any loss of floodplain storage is appropriately mitigated.	Work Area 5b: 400 kV Substation is located within Flood Zone 1 and therefore will not require compensatory storage. As outlined in Section A9.1.2.2.1 River Trent (Fluvial) of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A]

Subject	Summary	Comment	Recommendation	Response
	located outside functional floodplain and raised above predicted surface water levels, ensuring the development will be safe for its lifetime and will not increase flood risk elsewhere.			Work Area 6: National Grid Staythorpe Substation is located within the 1 % AEP + 23 % CC extent (30 % CC used as proxy) and is mostly modelled to flood to depths of less than 0.1 m (i.e. within the main platform area), as shown in Plate A9.1.26. The National Grid Staythorpe Substation has private hard (walls) and soft (embankments) defences to a level of 13.10 m AOD. As such, Work Area 6 is unlikely to be inundated during the 1 % AEP + 30 % CC and 39 % CC events, should the Development operate marginally into the 2080s epoch. The design is still at an outline stage, but the Outline Drainage Scheme includes a commitment to ensure that, should Work Area 6 be used as the connection point for the Development, there would be no loss of floodplain storage. This is considered to be reasonable given the minimal flood depths and the type of infrastructure needed in that area e.g. thin bus-bar poles etc. Once the design of the Development has been finalised then the need for minor compensatory storage can be established. This is secured by Requirement 10 of Schedule 2 of the Draft DCO (Surface Water Drainage Strategy).
		The flood risk chapter focuses only on the existing fluvial and pluvial flood risks. It does not assess how the proposed development could increase flood risk through the	The applicant should include an assessment of the potential increase in flood risk from the proposed development, considering new impermeable areas and crossings.	The design is still at an outline stage, but the Outline Drainage Scheme, included in ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] proposes

Subject	Summary	Comment	Recommendation	Response
		introduction of new hard standings, impermeable areas, or watercourse crossings. In addition, there is no information on the type of surfacing proposed, which is critical for understanding how surface water will be managed.	Also, clearly specify the proposed surfacing types to allow a proper understanding of drainage and flood risk impacts.	drainage principles which are secured through requirement 10 of Schedule 2 of the draft DCO [EN010162/APP/3.1]. Sections A9.1.2 to A9.1.6 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] discusses the management of surface water from all aspects of the Development, such as formal SuDS for Work Areas 4 and 5 and RSuDS for Work Area 1, to ensure there is no increase in the runoff rate. A detailed drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO and this approach is consistent with other consented solar DCO applications, such as Mallard Pass Solar Farm, West Burton Solar Project, Cottam Solar Project and Byers Gill Solar. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO. This is secured by Requirement 10 of Schedule 2 of the Draft DCO (Surface Water Drainage Strategy).
		The FRA only includes localised flood modelling for certain areas. It does not provide a full site wide assessment, so it is difficult to understand how flooding may move across the whole site or how different areas might affect each other during a flood.		Appendix D of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] shows flood extent mapping for the full site. Only a small section of Work Area 1: PV Arrays, located east of the site towards Carlton-on-Trent, is within

Subject	Summary	Comment	Recommendation	Response
				Flood Zone 2. All other PV Arrays are located within Flood Zone 1. The enhancement areas and cable route and connection is the only development located within Flood Zone 3.
		There has been no consideration of the potential increase in flood risk during the construction phase of works. Construction activities and temporary works may alter surface water flow paths, increase runoff, or reduce floodplain storage.		The measures to manage surface water runoff generated during the Construction phase is considered within section A5.3.9.1 of ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan [EN010162/APP/6.4.5.3]. Construction compounds would be located in Work Areas 1 and 5 and would therefore be located within Flood Zone 1. ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3] was updated at Deadline 1 to confirm that construction compounds will be located outside Flood Zone 3a and 3b, as requested by the Environment Agency.
		It is unclear why the Consented BESS within Work Area 7 and the existing infrastructure within Work Area 6 are being assessed as part of this FRA. Work Area 7 already has consent, and Work Area 6 relates to existing National Grid infrastructure. The inclusion of these areas in the assessment requires clarification.		The consented, and currently under construction, Staythorpe BESS (Work Area 7) and the existing Staythorpe Substation (Work Area 6) are not assessed within ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A]. The potential for the Development to electrically connect into Work Areas 6 or 7 is assessed within the FRA.
Drainage	The design strategy for various	The drainage strategy lacks many	Recommendations are summarised	

Subject	Summary	Comment	Recommendation	Response
Design Strategy	elements is summarised below: • **Solar Panel Areas** – The solar panel areas are designed to allow runoff to infiltrate naturally into the ground, replicating existing conditions. Rainfall drains through gaps between the panels, spreading across underlying grassland vegetation. The panels are raised a minimum of 500mm from the ground. Swales and filter drains will be implemented to slow flow down in areas where there is a ground slope steeper than 6%. • **BESS** – The Battery Energy Storage System (BESS) will drain to a lined detention basin, designed to restrict discharge to 4 l/s, in line with the site's greenfield runoff rate. Fire water will also be routed to this basin, which incorporates a Hydrobrake flow control. The basin is sized to accommodate the 1% AEP + 40% CC event together or a fire water volume of 228 m³. A penstock will be installed on the outlet of the SuDS structure and will be closed in the event of a fire suppression incident,	details which will be discussed further below:	below:	
		There is no single plan showing the full drainage layout across the entire site. This would be valuable to understand connectivity between catchments, location of SuDS features, exceedance flow paths, and interaction with topography.	Provide a drainage layout plan showing all catchments, SuDS features, discharge points, exceedance flow paths, and connectivity to receiving watercourses. Overlay with flood depth mapping to verify separation from high risk areas.	The Development has Work Areas and does not have a detailed design at this stage, therefore ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] proposes drainage principles which will be secured through a requirement in the draft DCO [EN010162/APP/3.1]. A detailed drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO and this approach is consistent with other consented solar DCO applications, such as Mallard Pass Solar Farm, West Burton Solar Project, Cottam Solar Project and Byers Gill Solar. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO.
		The basin has been sized either for firewater or for the 1 in 100-year storm event, however, a more robust approach would be to model the more frequent 1 in 2 year storm combined with firewater, or the 1 in 100 year storm including climate change, whichever is the greatest. No further details of the basin/attenuation have been provided, such as water depth, outfall arrangements, storage capacity, or supporting modelling results.	The basin design should consider either the 1 in 2-year storm with firewater or the 1 in 100-year storm with climate change. Further details of the basin should also be provided, including water depth, outfall, storage capacity, and modelling results.	As outlined in Section A9.1.4.2 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] there will be a dedicated lined (clay or synthetic liner) holding basin, separate to the SuDS structures to serve Work Area 5a, available for spent firefighting water to be pumped to in the event of a battery fire during heavy rainfall. As such, the SuDS system will not reach capacity during such an event. The Development does not have detailed design at this stage. A detailed

Subject	Summary	Comment	Recommendation	Response
	remaining shut until the captured water has been tested. Depending on the results, water will either be tankered offsite to a licensed facility or discharged to the adjacent unnamed field drain, subject to agreement with the Environment Agency. • **Substation** - Surface water from the substations in Work Areas 4 and 5b will be managed in the same way as the BESS (Work Area 5a), with drainage designed to attenuate the 1% AEP + 40% CC event. Infiltration testing confirmed that infiltration is not feasible due to underlying clays and mudstone. As such, SuDS systems will discharge at greenfield (QBAR) rates to nearby watercourses or field drains, in line with the SuDS hierarchy.			drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO, and will include further details of the basin.
		No assessment has been provided of potential water quality effects. It is unclear whether the basin will mitigate pollution using the SuDS mitigation index approach (SIA), or whether any of the other proposed SuDS features will provide this function. In addition, no site arrangement plan has been included, and there is no reference to the permeability of the access tracks. This will therefore need to be assessed in relation to both water quality and surface water runoff mitigation.	The applicant should provide an assessment of potential water quality effects, confirming whether the basin or other SuDS features will mitigate pollution using the SuDS mitigation index approach. A site arrangement plan should also be included, along with details on the permeability of access tracks, to address both water quality and surface water runoff mitigation.	A detailed drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO. The SIA tool will be used to assess the potential water quality effects of the SuDS design to serve hardstanding areas.
		The document also does not explain what would happen in the event of a larger storm. There is no mention of exceedance flows, how water would safely flow across the site if the drainage system was overwhelmed. Guidance from the LLFA and IDB usually expects clear plans for this, to make sure floodwater is routed away from sensitive equipment or areas and does not cause new risks off site. The strategy also does not explain what would happen if a flow control device became blocked, which is a realistic risk in practice. Some explanation of mitigation measures (for example, emergency spillways, bypasses or inspection regimes) would be expected.	Applicant to produce a site wide exceedance routing plan showing primary and secondary flow paths, measures to protect sensitive infrastructure, and ultimate discharge locations. Consider exceedance where surcharging may occur.	A detailed drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO.
		The strategy assumes solar arrays	The applicant should provide	As outlined in ES Volume 4, Appendix

Subject	Summary	Comment	Recommendation	Response
		will not increase runoff due to proposed berms and filter drains, but no quantitative evidence is provided. Key uncertainties remain around the design and function of filter drains, including storage, infiltration, and outfall arrangements. Without this, there is a risk of channelised flow increasing flood risk under exceedance conditions. The drainage strategy also lacks sufficient detail on runoff collection, conveyance, construction, materials, lining, and flow control, making it unclear how the system will operate in practice.	quantitative evidence to show that the solar arrays will not increase runoff with the proposed berms and filter drains. Further detail is needed on the design and function of the filter drains, including storage, infiltration, and outfall arrangements, as well as how runoff will be collected, conveyed, controlled, and discharged.	A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A], there is a substantial body of academic 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 panels. As outlined in Section A9.1.3.2.1 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A], 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

Subject	Summary	Comment	Recommendation	Response
				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. Once the design of the Development has been finalised then the design of active measures such as berms, stone filter drains and swales will be finalised, which is consistent with the approach taken for the consented Mallard Pass Solar Farm DCO (see outline Water Management Plan (oWMP) PINS Ref: EN010127 Document Ref: EN010127/APP/7.13.2. 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.
		No consideration has been given to whether the solar panels and associated structures can withstand the impacts of lateral flood flows, which is essential to ensure structural stability and prevent damage during flood events.	It is recommended that the design of the solar panels and associated infrastructure includes an assessment of resilience to lateral flood flows to ensure structural stability and minimise the risk of damage during flood events.	Only a very small section of PV arrays is located within Flood Zone 2, following the latest update to the Flood Map for Planning (November 2025), in the east of the Order limits, towards Carlton-on-Trent. All other PV arrays are located within Flood Zone 1, meaning fluvial flows will not interact with the racking mounts for the lifetime of the Development in these areas. The racking mounts will be made of high tensile metal. Velocity is a major factor in aggravating structure and content damage, as the additional force of high velocities creates greater danger of foundation collapse. McBean *et al*. (1988) states that a velocity of 3 m/s acting over a depth of

Subject	Summary	Comment	Recommendation	Response
				1 m will produce a force sufficient to exceed the design capacity of a typical residential wall. Pluvial flows within all work areas will not exceed 3 m/s even on steep slopes. As such, the PV will be safe for its lifetime in accordance with NPS EN 1.
		There is no section on maintenance provided, elements such as swales, ditches, or filter drains will be managed. Without specific maintenance requirements, there is a risk that these features could lose effectiveness over time through siltation, vegetation overgrowth, blockages, or structural deterioration. This lack of detail creates uncertainty over the long-term resilience and performance of the proposed drainage system.	The applicant should provide a maintenance plan for SuDS features such as swales, ditches, ponds, and filter drains. This should set out specific requirements to prevent issues like siltation, overgrowth, blockages, or structural deterioration and ensure long- term system performance.	We agree that without proper maintenance then the functionality of SuDS features could reduce over time. Maintenance of the grassland for Work Area 1: Solar Area is outlined in the oLEMP [EN010162/APP/ 6.4.5.1A]. An outline maintenance plan for SuDS features will provided within the oLEMP [EN010162/APP/ 6.4.5.1A]. When the final design of the Development is undertaken then the final LEMP will be updated to confirm the maintenance requirements for SuDS features.
		The current documentation does not explain how compaction of the ground during construction activities will be managed. At present, the ground is relatively undisturbed, but sustained traffic from excavators, delivery wagons, and dumpers over the course of the works is likely to compact soils. This compaction could significantly reduce infiltration potential and increase surface water runoff compared to existing conditions, thereby undermining the performance of SuDS features and increasing flood risk.	It is recommended that a soil management plan is developed to address the risk of compaction during construction. This should include measures such as limiting construction traffic to defined haul routes, using low ground pressure machinery where feasible, phasing works to minimise disturbance, and undertaking soil decompaction.	An outline Soil Management Plan ES Volume 4, Appendix A17.2 [EN010162/APP/6.4.17.2] was submitted with the DCO application, and details measures to avoid compaction during all phases of the Development. Section A9.1.3.1.3 of ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A], outline measures to avoid compaction of the ground during construction activities.
		The drainage strategy indicates groundwater has been identified locally in boreholes southeast of	The applicant should show how groundwater depth has been considered in the basin design,	The Development has Work Areas and does not have a detailed design at this stage, therefore ES Volume 4,

Subject	Summary	Comment	Recommendation	Response
		Work Area 5a at depths between 1.8–3.0 m BGL. It is unclear whether this has been fully considered in the design of the basin, particularly with respect to their storage capacity, and potential groundwater surface water interactions. No assessment has been provided on seasonal fluctuations, nor has any commitment been made to ongoing monitoring.	assess seasonal changes, and commit to monitoring.	Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] proposes drainage principles which will be secured through a requirement in the draft DCO [EN010162/APP/3.1]. A detailed drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO and this approach is consistent with other consented solar DCO applications, such as Mallard Pass Solar Farm, West Burton Solar Project, Cottam Solar Project and Byers Gill Solar. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO, and will seek to avoid interaction with groundwater levels.
		The purpose of the proposed SuDS features is unclear, as they are not connected to any defined drainage system and there is no evidence of catchments discharging into them. The drainage strategy also lacks the necessary detail to demonstrate how the system will operate in practice. Key information is missing, including how runoff will be collected and conveyed to filter drains, how water will enter and pass through these features, the proposed surface materials for the BESS compound and substation areas, whether all the features will be lined, details of penstocks or other flow control	It is recommended that the Drainage Strategy is updated to demonstrate the purpose and benefits of the SuDS features and how they integrate with the overall drainage strategy. We would like to see outline engineering detail of all proposed drainage and SuDS features. This should include catchment and collection arrangements, inlet and outlet structures, confirmation of pond lining, penstock and flow control details, and clear long sections, cross sections, and typical details for swales, filter drains, ditches, ponds, and associated infrastructure.	The Development has Work Areas and does not have a detailed design at this stage, therefore ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1A] proposes drainage principles which will be secured through a requirement in the draft DCO [EN010162/APP/3.1]. A detailed drainage plan will be provided once the detailed design of the Development has been progressed and finalised, following the issue of the DCO and this approach is consistent with other consented solar DCO applications, such as Mallard Pass Solar Farm, West Burton Solar Project,

Subject	Summary	Comment	Recommendation	Response
		structures, and adequately detailed long sections, cross sections, and construction details		Cottam Solar Project and Byers Gill Solar. The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO.
		A site layout has not been provided, making it unclear whether the scheme involves any watercourse crossings or where any outfalls are connecting into. Without this information, it is not possible to determine the extent of consultation required, and these topics are not addressed elsewhere in the report.	The applicant should provide details of proposed water course crossings.	Figures A5.3.1 and A5.3.2 of ES Volume 4 – Technical Appendices Technical Appendix A5.3 – Outline Construction Environmental Management Plan [EN010162/APP/6.4.5.3] show the locations cable and access track crossings of watercourses. Section A5.3.9.5.4 Watercourse / Drainage Ditch Crossings states that Crossings will be designed as part of detailed design, post-consent, and the oCEMP commits to the soffit level of any bridges sitting above the design flood level. The design flood level for permanent crossings would be the 1 % AEP plus Higher central climate change scenario (39 % CC) and will involve the following parameters: • Soffit height of the bridge will be a minimum of 600 mm above the 1 % AEP + Climate change allowance flood level; • All abutments must be set back a minimum 1m from the top of the bank and as minimal as possible; • Any loss of floodplain due to abutments and ramps will need to be compensated for, as outlined in the oCEMP; • All parapets and railings need to be permeable and open as possible with a minimum 100 mm spacing; and

Subject	Summary	Comment	Recommendation	Response
				• The Development has been redesigned to avoid placing Works Areas 1, 4 and 5a and 5b within the 1 % AEP + 39 % CC extent for the River Trent and the 0.5 % AEP tidal events (plus climate change (23 %) in accordance with Table 2 of *Accounting for residual uncertainty: an update to the fluvial freeboard guide*, Table 2 of the Engineering Design Standard, EDS 07-0106 Substation Flood Protection (2016)47 and Energy Networks' Associations Engineering Technical Report 138 (ETR138).
		Greenfield runoff rates have been calculated using the ICP SuDS method /IH 124 FEH methods are typically preferred, however this method is commonly used.		The ICP SuDS method is the most appropriate method for calculating runoff rates, where the catchment is between 0 and 50 ha. Given the smalls scale of the catchments serving Work Areas 4 and 5, the use of the ICP SuDS is appropriate for the Development. ICP SuDS is a linear interpolation based on the IH 124 FEH method and therefore is appropriate.
Design Parameters	The report states the following design parameters were used: • The design parameter for fluvial risk is the 1 in 100 year event with a 23% climate change allowance (2050s epoch, Higher Central), with a higher proxy allowance used where 23% data is unavailable, and a 38% allowance applied as a validation check.	The design parameters appear to be reasonable, however without direct minutes from consultation, it is difficult to conclude if these have been agreed with the relevant stakeholders. Additionally without modelling results for the proposed SuDS, its not possible to review if the SuDS have been designed in line with requirements.	It is recommended that all meeting minutes and agreed design parameters are provided. It is recommended that modelling results for SuDS are provided.	See Appendix E The detailed design of the SuDS network for the Development will be provided to the LLFA, following granting of the DCO.
	• The design parameter for tidal flooding is the 1 in 100 year event with a	The report states that decommissioning "may" start in 2069. However, the assessment does not clearly cover the full demobilisation	The applicant should confirm and agree the assessment epoch with the Environment Agency to ensure it fully covers the decommissioning and	As outlined in Requirement 19 of the draft DCO, if the undertaker anticipates that the operation of any part of Work Area 1 will continue after

Subject	Summary	Comment	Recommendation	Response
	39% climate change allowance (2050s epoch), with a 62% allowance (2080s epoch) applied as a validation check. • The design parameter for pluvial flooding is the 1 in 100 year event with a 25% climate change rainfall allowance for the 2070s epoch, in line with EA guidance. • A 1 in 100 year (1% AEP) storm with 40% climate change allowance will has been defined for the design of SuDS features, in line with LLFA requirements.	phase, which could extend beyond this date.	demobilisation period.	31 January 2069, it must submit to the planning authority (following consultation with the Environment Agency): • an updated flood risk assessment of the flood risk arising from the continued operation of that part of Work No. 1 after 31 December 2069; • the details of any mitigation or compensation measures that the flood risk assessment under paragraph (a) recommends are necessary; • the implementation timetable, including identifying the need for (but not requiring a specific programme for the obtaining of) any consents, for any measures identified under paragraph (b); and • retention proposals for any measures identified under paragraph (b) for the remaining lifetime of the authorised development

Appendix 3: Ossington Airfield Joint Statement

Great North Road Solar and Biodiversity Park

Former Royal Air Force (RAF) Ossington

Joint Statement with Nottinghamshire County Council

Document Reference – Appendix 3

March 2026

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, APFP Regulation APFP 4(2)

Contents

1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

1 This Statement has been prepared by the Applicant together with Nottinghamshire County Council (NCC), and sets out the position of the Parties with respect to the former RAF Ossington. This has been prepared in response to Question 8.2.8 from **Examining Authority's Written Questions 2 (ExQ2)** [PD-011] in relation to the Greater North Road Solar and Biodiversity Park (application reference: EN010162), hereafter referred to as 'the Development'. The Examining Authority (ExA) has requested a joint statement between the Applicant and NCC that sets out the following:

a) The heritage significance of the Airfield. This should include:

i. an assessment of its heritage values

ii. clarity on the nature and locations of the elements contributing to significance

iii. consideration of where further information is required to clarify the nature and contribution of particular elements, and whether/ how it this can be obtained

iv. consideration of the extent of the setting of the Airfield

b) An assessment of the effects of the proposed development on this heritage significance, including setting; and

c) A statement of how any direct and indirect effects could be mitigated.

2 In this context, this Statement sets out a brief description of the former RAF Ossington and clarifies which parts lie within the Order Limits. The statement also provides a consideration of the significance of the former Airfield, both in terms of its overall value, and the individual components of the airfield that survive. Consideration is given to the potential impacts of the Development upon the significance of the remains of the airfield, both in terms of direct (physical and non-physical) impacts within the Order Limits, and in terms of non-physical effect resulting from changes in setting for those elements of the former airfield beyond the order limits.

3 Mitigation, where proposed and considered necessary, is also highlighted.

4 The Statement clarifies where the Parties agree or are in disagreement.

5 The language used in this document to articulate significance, impacts and effects is consistent with the assessment methodology presented in the Cultural Heritage Chapter of the Environmental Statement [REP2-038].

2 DESCRIPTION OF THE ASSET

6 This section addresses part (a) of the Examining Authority's question. It is not intended as an exhaustive description of the form RAF station, nor a detailed record of all of the component surviving structures and features that lay within it (whether within the Order Limits or not).

2.1 OVERVIEW

7 Former RAF Ossington consists of the remains of a Second World War RAF airfield located around the village of Ossington. The runway areas lie to the

west and north-west of the village. The proposed development will occupy a part of the former runway area to the west of the village (as shown on Sheets 23, 24 and 30 of the, **ES Volume 3, Figure 5.4: Illustrative Design [EN010162/APP/6.3.5C]** [APP-083]). Many of the buildings and facilities of the wider airbase survive in varying condition in locations around the village, to south, east and north.

8 At the time of the preparation of the Environmental Statement (June 2025) the former RAF Ossington was identified in the Nottinghamshire Historic Environment Record (HER) under the reference **L10557**.

9 The HER record for the former Airfield has subsequently been revised and expanded, and now comprises 32 entries. These catalogue structures related to the wider airfield, such as the former WRAF accommodations, various blast and bomb shelters, as well as remains around the runway area.

2.1.1 Historic Development

10 RAF Ossington, is a former RAF station built in 1941 as part of the wider development of airfields across the United Kingdom and was placed under the control of No.5 Group RAF Bomber Command (Falconer J 2012).[1] The airfield was one of 19 military airfields that were either requisitioned from civilian use, developed First World War landing grounds or were constructed during WWII in Nottinghamshire (Osborne 2011: Appendix 7).[2] Overall some 450 new airfields were established across the United Kingdom during WWII (Historic England 2017b).[3]

11 The airfield was developed from the onset as a bomber station to the Class 'A' standard design, the most commonly used design for WWII airfields and primarily in use by heavy bomber groups. The Class A Standard design revolved around three runways, a main runway of 2000 yards supported by two subsidiary runways of 1,400 yards (Historic England 2017b).[4] According to sources, the runways at Ossington were first grass before being paved in 1942 (Osborne 2011).

12 The Class A Standard was supported by a series of dispersed hardstanding's and a perimeter track, usually some 50ft wide. The airfields would include at least one 'technical' site and a series of 'domestic' sites, the latter usually found some distance from the main runway. The technical site would usually contain two T2-type hangars plus smaller hanger buildings, control tower, storage depots and other ancillary buildings used to support operational management of aircraft. Designs by this point for buildings had become relatively standardised having to follow strict guidelines established by Royal Fine Arts Commission and the Society for the Preservation of Rural England.

13 RAF Ossington was an a-typical Class A airfield as identified on its layout illustrated in **Appendix 1**. It features the three-runway design with dispersals

[1] Falconer J, 2012. *RAF Airfields of World War 2.* Crécy
[2] Mike Osborne, 2011. *Defending Nottinghamshire: The Military Landscape from Prehistory to the Present.* History Press.
[3] Historic England 2017b, Nine Thousand Miles of Concrete: A Review of Second World War Temporary Airfields in England. Swindon
[4] Historic England 2017b, Nine Thousand Miles of Concrete: A Review of Second World War Temporary Airfields in England. Swindon

areas and a taxiway around the airfield, with technical sites to the south, north and east of the runways. The plan shows that RAF Ossington came equipped with four T2 hangars located along the northern perimeter of the taxiway and further technical buildings to their north and south and east. Storage of munitions was within High Wood to the south of the runway with structures just north of the woods suspected to have served as area for priming and maintaining the munitions.

14 The domestic areas were split into several sites to the east of the airfield with Ossington Hall requisitioned for accommodation and offices. Accommodation for the Women's Auxiliary Air Force were located to the northeast of the airfield well away from the male accommodation. The communal area for RAF Ossington was located to the south of Ossington hall, shown on the plan in **Appendix 1** as the 'COMM Site'.

15 RAF Ossington was one of 20 initial sites identified to trial arrester gear systems and while the decision was made to have them at all major airfields, this was mothballed and it is thought that 120 were built and later scrapped.[5] One of the primary reasons for removal of the system was a result of the standard design of runway that came into effect which allocated longer runways for bombers. There is evidence to suggest that the arrestors at Ossington were installed within areas of hardstanding and the equipment could be retracted into subsurface concrete containment structures surviving within the former Airfield. The likely concrete bases and subterranean structures have been identified during site work.

16 From June 1943, RAF Ossington also became the home of the No.82 Operational Training Unit (OUT) RAF and in 1944 by the No. 1685 Bomber Defence Training Flight for a short period of time. The No.82 OUT left RAF Ossington in 1945 after which time it was used to train pilots in Avro Lancasters and Avara Lancastrians by the British Overseas Airways Corporation (BOAC) until it was eventually closed in 1946.

17 Following the closure of RAF Ossington the land was returned for agricultural use, though much of the airfield was still present in 1960 as illustrated in **Figure 1**. The primary buildings that were lost by this point appear to be the four dispersed sites located to the east near The Grange, Lady Elinor's plantation and Carlton Wood. However, by the 1990s most of the runways and taxiways had been lost together with the technical buildings located inside the Order Limits including the T2 hangars. What remained of the runways and taxiway where converted into the road known today as Loverose Way. Sections also survive under the main road heading west from Ossington village.

18 Outside the Order Limits, some of the ancillary buildings (such as the WAAFs' quarters and the Motor Transport Section garages) in the wider landscape survived and still exist today in various states of disrepair, as documented by the recent initial survey undertaken by Nottinghamshire County Council and are considered by NCC to be the most complete collection in the county. In some cases only traces of building foundations or platforms remain, although elements of the supporting infrastructure such as pipework and possible settling tanks associated with the sewage system survive to the north of the lake at Ossington Hall. The Hall itself was taken

[5] https://aviationtrails.co.uk/the-development-of-britains-airfields/

over and used by the RAF. The hall itself no longer survives. Other structures such as bomb shelters, blast shields, pyro stores and the former bomb storage area (now under High Wood, to the south/south-east of the Order limited and to the south of Ossington Road) are dotted around the wider landscape. The majority of these structures now are located within blocks of woodland and no longer (if they did originally) have any visual linkage with the runway area.

19 The Parties are agreed that those components without visual link to the DCO area in the wider landscape around Ossington village do not require further detailed consideration for purposes of this Statement.

2.1.2 Physical remains within the Order Limits

20 The following section describes the remains of RAF Ossington located within the Order Limits. This presents an overview for information and is not intended as a detailed record.

21 Parts of the former northwest-southeast aligned runway and areas of the taxiway have been re-used as an access road for primary farm traffic. These sections survive as a small concrete (with a heavy mix of pebble) one-way vehicular road. Extensive pitting and rudimentary repair are evident throughout (**Plate 2**). However, the geophysical survey undertaken on part of airfield identified anomalies that are likely to be partial remains RAF Ossington northeast-southwest aligned runway and that are now buried by soil.[6]

22 Where the runways and perimeter taxiways have been reused as tracks, these have been significantly reduced in width.

23 Sections of the former northwest-southeast runway drainage were noted along the eastern boundary of the access road, highlighting that what was re-used as part of the access road was part of the eastern section of the runway (**Plate 3**).

24 A number of features related to the arrestor systems survive within the Order Limits, including two areas of concrete hardstanding and subsurface containment structures identified either side of the northwest-southeast runway close to its northwestern end (see example on **Plate 4**). Similar traces exist elsewhere within the wider airfield site. These remains are thought to have been used to support arresting gears. Several versions of arresting gears were established during WWII. The general premise was for a cable or net to be suspended across a runway between paired anchor points and designed to engage with an aircraft fitted with a tail hook, bringing it to a controlled halt where conventional braking was insufficient and reducing the risk of an overrun beyond the runway.

25 These subsurface concrete structures are covered with metal plates and these may in fact be related to a retracting installation version of the arrester system. These “tanks” were covered and full of water at the time of the site visits, and no further investigation was undertaken at that time.

[6] Results of the geophysical survey are recorded in Phase 2 available at https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010162-000177-GNR_6.4.11.5_ES_TA_A11.5%20Phase%202%20Geophysics%20Results%20-%20Part%201%20of%205.pdf

26 Located to the west of the northwest-southeast aligned runway is the former battle headquarters for RAF Ossington (**Plate 5**). Now situated in a shelter belt at the western end of the main runway, the battle headquarters would have coordinated the defence of the airfield in the event of a landing by enemy forces. Although internal access was not possible (due to debris and water), based on its external appearance the battle headquarters appears that it may follow the standard layout established by the Air Ministry (Design 11008/41) though this cannot be confirmed. Areas of the brickwork have been damaged by rooting while the concrete roof over the observation post of the headquarters shows some signs of decay, with the iron supports visible in the viewing slot showing signs of corrosion).

27 Located to the south of the battle headquarters is a M & E plinth, comprising a single storey building with a baffled entrance (**Plate 6**). The building would have houses the mechanical and electrical transformers and switchgears for the airfield, with such building established at all RAF airfields. The survey found that much of the baffled entrance had collapsed or was in a state of disrepair while there was obvious sinking of the concrete roof and door lintel.

28 Given the historic maps available as **Figure 1** and **Figure 2**, it is clear that limited remains of the RAF Ossington are present within the Order Limits and where they do remain, they are in a generally poor state of preservation.

Plate 1) View of the memorial located adjacent to the Order Limits, facing northeast

Plate 2) View of what remains of the former northwest-southeast aligned runway, facing northwest

Plate 3) exposed section of the former northwest-southeast runway drainage, facing northeast

Plate 4) View of the eastern area of hard standing used as part of a possible arresting gear system, facing northeast

Plate 5) View of the former battle headquarters, facing north

Plate 6) View of the M&E Plinth building, facing north

2.2 SIGNIFICANCE

2.2.1 Archaeological interest - limited

29 The archaeological remains would comprise elements such as the former runways and hardstanding and below ground remains of former buildings (such as the hangars etc.), as identified in the recent walkover survey and during the geophysical survey.[7] Based on the information collated, such remains are likely to be truncated or provide minimal further information on the operation use of RAF Ossington that is not already known from documentary and physical records. At most, they are likely to confirm what we already know of the asset.

30 All elements of RAF Ossington are anticipated to have been built to the standards forms used for structures or for the development of the airfield itself which by 1941 had become standardised under The Air Ministry Directorate General of Works (AMDGW). There is no evidence currently available to suggest it contained unique structures or innovation in its design.

2.2.2 Architectural interest - limited

31 Very little survives of the former RAF airfield within the Order limits. There are no surviving hangers and no control tower, so that the typical built form of an airfield is no longer apparent. Some of the runways have been removed or now lie under the realigned Ossington Road. Where they survive within the Order Limits, they have been significantly reduced in width (essentially reduced to a farm track). Where built remains do persist they are in varying conditions, but mostly in a state of disrepair, with some reduced to foundations only. The surviving buildings are typical examples of Second World War airfield design and do not appear to display distinctive architectural features or unusual construction details. This is unsurprising given the high degree of standardisation in military airfield construction by the time RAF Ossington was established.

32 The only structure of note within the Order Limits is the surviving battle headquarters. However, consistent with the remainder of the site, it exhibits no distinctive or innovative design characteristics and is currently in poor condition, with damaged brickwork, evidence of flooding and structurally compromised concrete. Historic England guidance on military structures (2017) notes that Second World War airfields have been extensively studied and that the most complete and representative examples have already been identified for designation. Given the standardised nature of their design and the large number constructed, statutory protection is considered appropriate only for a limited number of sites, such as at Hucknall where the other Battle HQ in the county is grade II listed. In this context, the Battle Headquarters at Ossington, both in isolation and as part of RAF Ossington, is of heritage interest as the only other identified example in the county.

2.2.3 Artistic interest

33 RAF Ossington is considered to have no artistic interest. No evidence has been identified to suggest that the airfield was depicted in artwork, nor is

[7]

there any indication that the buildings contained murals or other forms of artistic decoration.

2.2.4 Historic interest

34 Although RAF Ossington would have contributed to the defence of the United Kingdom and to wider bombing operations over continental Europe during its period of use as a bomber station, there is no documentary evidence to indicate that it undertook any distinctive or strategically significant operational role. It is not known to have been involved in specialised or exceptional missions, such as those carried out by No. 617 Squadron RAF during the Dambusters raids. Its prolonged use as a training facility further underlines this limited operational activity, reflecting that its location was considered to be sufficiently removed from threat to allow it to function effectively in this capacity.

35 The historic interest that the site does possess lies primarily in its contribution to local memory (illustrative historic interest). Ossington forms part of the shared wartime experience and illustrates the transformation of the Nottinghamshire landscape during the Second World War. It also provides insight into how the county functioned within the wider network of airfields established across the region, demonstrating the relationship between local land use and broader strategic military planning.

36 The local memory of the airfield is personified by the memorial that was gifted to the personnel stationed at the Ossington to the Holy Rood Church.

37 The communal value of the former Airfield is further represented by the recently added memorial placed adjacent to the main road west of Ossington, along the line of the main northwest-southeast aligned runway (see Plate 1). The memorial was erected by The Airfields of Britain Conservation Trust (ABCT) to commemorate the personnel who served at the RAF Ossington during its operational use (**Plate 1**). The memorial is one of some 200 that have been erected across the United Kingdom by the ABCT.

2.2.5 Overall

38 Whilst individual components of the former RAF Ossington survey in varying condition within the wider landscape, individually their significance is limited. However, together they contribute to the overall significance of the asset. The represent a variety of activities and organisations that illustrate the wider life of an RAF airfield, and the extent of the remains shows just how much of a major change this represented in the lives of the villagers at the time of the Airfield's operation. Whilst the condition of many individual components is poor, some survive quite well, and they add to the broader character of the Ossington environs (albeit, this largely obscured and hidden by the wooded environs of many of the components). Overall RAF Ossington is considered by NCC to be the best collection of WWII airfield assets in Nottinghamshire, including some that are not known to survive anywhere else in the county.

2.3 SETTING

39 When considering the setting of a Second World War airfield, two elements typically make a positive contribution to an asset's overall heritage significance. The first is the visual relationship between buildings that shared

a functional role, for example the clear sightlines between a control tower and the runway. The second is the presence of uninterrupted skyward views. Such openness was a primary consideration in site selection, with airfields required to be located on flat land offering clear lines of sight in all directions, particularly along the axis of the runway. This enabled visibility of approaching aircraft and assisted incoming pilots in identifying the airfield.

40 In the case of RAF Ossington, no above ground buildings survive that historically relied upon or expressed a functional visual relationship, either within the airfield itself or with the surrounding landscape apart from the Battle Headquarters. There are no **other** surviving structures, such as a control tower, that required unobstructed visibility over the wider landscape. Although the Battle Headquarters survives, its function was defensive, providing a secure location from which the Defence Officer could coordinate the protection of the airfield. Its location on the western edge of the Airfield, overlooking the wider landscape as it drops away to west and north-west further speaks to an externally focussed defensive function.

41 From the surviving sections of runway at RAF Ossington, expansive and largely uninterrupted panoramic views remain, reflecting the flat and open landscape character that informed the site's original selection and operational function. This openness allows an appreciation of the practical requirements of military aviation, particularly the need for clear approaches and visibility along the runway alignment. It is considered that these views make a positive contribution towards its heritage significance.

2.4 SUMMARY

42 Based on the statement of significance provided above, RAF Ossington is considered to be a non-designated heritage asset of some heritage significance and that significance is derived from its archaeological, historic and architectural interests. The setting of the assets, principally its wider ranging views skyward in the main runway area, also contribute to its heritage significance. Alongside the notable collection of airfields from 'Bomber County' (Lincolnshire) RAF Ossington is considered to be of regional significance by NCC.

43 NCC understands that NSDC is considering a conservation area designation for the airfield as part of their present conservation area review (ongoing). The Applicant notes that NSDC has not raised this in any form in communication with the Applicant and therefore this is absent the Statement of Common Ground with NSDC.

2.5 POSITION OF THE PARTIES

44 Both the Applicant and NCC acknowledge that the former RAF Ossington is a non-designated heritage asset.

45 The Applicant considers the heritage significance to be low and of no more than County importance, however NCC consider the heritage significance to be higher, and to be of regional if not greater importance.

3 IMPACT ASSESSMENT

46 This section addresses part (b) of the Examining Authority's question.

3.1 INTRODUCTION

47 The following sections are provided as an assessment by the Applicant of the potential effects of the Development on the remains of RAF Ossington, using the framework outlined in the Environmental Statement (ES).[8]

48 For the purposes of this assessment, the stages of where an impact could occur are:

- Direct effects during the construction phase
- Indirect effects (setting) during the operational phase.

49 As outlined in the ES, there are not anticipated to be any indirect effects that would have a permanent effect on heritage assets during the construction phase, while there are anticipated to be no direct effects during the operational or decommissioning phase. Any effects on setting will be reverted following decommission phase too.

3.2 DIRECT EFFECTS (CONSTRUCTION)

50 This assessment is based on the parameters for development as shown on the **Works Plans [EN010162/APP/2.3A]** [AS-005].

51 The proposed illustrative design for the Development shows solar array panelling within the areas between the remaining elements of the runway. These are shown as N12.1, N12.2 and N12.3. Each area of solar array would be surrounded by a security fence while for N12.1 and 12.3, a proposed new tree belt will be created along the southern boundaries of each solar array area.[9]

52 In addition, the western section of RAF Ossington, will form part of the Work 3 mitigation area where a number of proposals are planned. This area contains the battle headquarters.

53 A cable will also be installed along the western edge of the former airfield site. However, this will not require the removal of the shelter belt within which the Battle HQ building is situated. The cable can also be located and installed without removal of the M&E plinth building. Both of these buildings will be preserved, and specific measure to protect them during construction will be included in the Design Principles, and in the oAMS. The detailed design of the development is secured by Requirement 6 (Detailed Design) of the **Draft Development Consent Order [EN010162/APP/3.1E]**, which would be informed by the further archaeological investigations secured by Requirement 11 (Archaeology).

54 Elements of the runways were found in the geophysical survey (and survive as one of the main access tracks within the former airfield site), while further elements in the form of the concrete pads/holding tanks used for the arresting gears may be physically impacted by the Development. These effects were considered with the **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [APP-054]

55 Table 11.6 as having a **high magnitude of impact** on an asset of l**ow heritage significance**. This would result in a **minor adverse impact** as

[8]

[9] Development details provided in Environmental Statement Volume 3, Chapter 5 Development Description. Available at:

identified in the ES. The addition of the new discoveries does not change the outcomes of the assessment completed in Chapter 11.

56 Solar arrays are proposed over the location of the arresting gears concrete hardstanding and possible holding "tanks", which may involve the partial or complete removal of these features. This would result in a **high magnitude of impact** on features of **local heritage significance**. This would result in a **minor adverse impact** as identified for the other features associated with the runway captured in the ES chapter. Where possible the detailed design would seek to avoid these impacts through avoidance or changes to the panel installation technique, extent or foundation design.

57 It is not intended to remove the shelter belt in which the Battle Headquarters is situated, and retention of the Battle Headquarters building will be ensured. The potential that the Battle HQ might be removed was already considered in **ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]** [APP-054]**.**

58 Table 11.6 as having a **high magnitude of impact** on an asset of **low heritage significance**. This would result in a **minor adverse impact** as identified in the ES. However, as noted above, there is no intention to remove this building.

59 As with the battle headquarters, it is intended to route the cable so as to avoid the M and E plinth structure. The ES had considered that removal of the M&Eplinth building would be considered to result in a **high magnitude of impact** on an asset of **low heritage significance**. This would result in a **minor adverse impact.** However, there is no intention to remove the buildings, and its preservation during construction will be secured as a constraint in the Design Principles, for detailed design.

60 All remaining elements of RAF Ossington fall outside the Order Limits and will therefore not be subject to any physical impacts as a result of the Development.

61 Decommissioning effects are not likely to be worse than construction effects, and are not considered further.

3.3 INDIRECT EFFECTS ON SETTING (OPERATION)

62 The Development is not anticipated to affect the all-round outward visibility that contributes to the significance of the non-designated heritage asset. The airfield was deliberately sited to allow clear and uninterrupted lines of sight in all directions, including skyward views, in order to monitor incoming aircraft. Such views will still be available within the airfield, noting that some runways have been removed, and/or reduced in width, or now partially incorporated into the realigned Ossington Road.

63 The Illustrative design shows that the track along the line of the former northwest-south-east aligned runway will be maintained, preserving that alignment.

64 The settings assessment has considered that individual intervisibility between the remaining features of the former RAF Ossington that lie both within the Order Limits and outside makes no contribution to the significance of the non-designated heritage asset overall or how we come to understand, appreciate or experience its defined interest. This is based on the fact that

that many of the facilities and other structures of the former Airfield are not dependant on intervisibility to contribute to their significance. However, this is not true for all the surviving elements, in particular those dispersal pens and Nissen huts to the south of the runways (and outside of the Order Limits to the south of Ossington Road). The ability to understand the construction, form and function of the WAAF quarters does not require visibility of the battle headquarters nor the runways to appreciate its significance, whereas intervisibility of the control tower (had it survived) and runways would be crucial to appreciating its significance. of the WAAF accommodation. The Battle headquarters does have an inwards visual relationship with the main airfield (in addition to an outwards facing relationship to the wider landscape as it drops in height to west and northwest), in particular with the perimeter track and runway area, but the Applicant considers that this is not so altered as to prevent an understanding of the defensive purpose and significance of that building by the presence of panels in the open areas to its east; NCC does not accept this and considers the panels will affect this relationship.

65 In this respect, the Applicant considers that the currently open aspect of the airfield as it lies within the order limits is not a key aspect of the setting of the airfield, or features such as the surviving runway sections, perimeter tracks (as these are not being removed or covered) and other features within the wider airfield) However, NCC consider that this is not the case, and this open aspect is important.

66 The airfield can be said to be the setting for the surviving structures within it (recognising the contribution made by the presence of the village and Ossington Hall and its parkland). The airfield as a whole has a wider setting, related to the landscape and local topography (the presence of a sufficient area of flat enough land in the desired region) as well as other factors such as operational requirements, leading to the selection of the Ossington area for its location. The Applicant considers that the ability to appreciate these wider factors as part of the historic setting is not in any way harmed by the proposed development. NCC do consider that this will be harmed, and the degree of harm will in part be determined by the perimeter treatment of the solar array.

67 NCC considers that the open character of this part of the former Airfield does form the setting within which the significance of the runways and other infrastructure within the Order limits can be appreciated.

68 The lack of significant and distinctive airfield structures such as hangars and control tower serves to reduce the legibility of the area as an airfield. However, the currently open nature of the northern part of the airfield would clearly be changed, further reducing its legibility.

69 It is noted that the Applicant proposes to retain permissive access within the airfield zone (along its southern boundary, with the Order limits), where it lies within the Order Limits, so that the physical layout of the former airfield will still be appreciable.

70 Although the solar array will introduce built form of limited height that may interrupt some views from the battle headquarters across parts of the former airfield, these views are already curtailed by established woodland surrounding the structure. Moreover, the ability to understand the building's former defensive and organisational role derives principally from its

architectural form, layout and surviving fabric, rather than from the retention of uninterrupted inward views across the airfield. However, it is acknowledged that this inward looking aspect is a part of understanding the role of the Battle HQ in coordinating the defence of the airfield as a whole, and contributes to its significance.

71 In light of the above, the Applicant considers that the Development would have a very limited effect on the setting of RAF Ossington and its contribution to its heritage significance. The effect is considered by the Applicant to be of **low magnitude** (although NCC consider the impact to be greater, as noted in 3.4.2 below) on an asset of low heritage significance (as a Non-designated Heritage Asset), the effect of which is assessed as "minor" and **not significant** for purposes of the EIA regulations. This effect is limited to the north-western part of the wider airfield (that is, that part within and immediately adjacent to the Order Limits), as the contribution made by components around Ossington Hall and further would not be so affected. Similarly, the open character of the wider runway area of the former Airfield can still be appreciated in the area to the south of Ossington Road.

3.4 POSITION OF THE PARTIES

3.4.1 Direct Impacts within the Order Limits

3.4.2 The Applicant considers that whilst there may some limited harm to the archaeological remains within the Order Limits, this can be mitigated effectively through the process set out in the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C].**

72 Design changes may lead to preservation in situ (where practicable, and this is the preferred option) to preserve elements such as the concrete structures for the arrester gear, and investigation and recording leading to preservation by record may be appropriate for the archaeological traces of former structures located within the order limits in the northeast part of the runway area.

73 NCC accepts that the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]** is a suitable mechanism for mitigating direct physical effects with a presumption towards preservation in situ.

74 The Applicant's proposals will not require removal or alteration to the Battle HQ or the M&E plinth buildings. Their presence will be noted in the Design Principles for detailed design, and it is proposed to maintain a precautionary buffer around them during construction, with any specific measures (such as the need for visual barriers or fencing during construction) identified in the oAMS.

75 The Parties are agreed in this regard.

3.4.3 Settings Effects

76 The Applicant considers that there is limited harm to the significance of the former RAF Ossington. It acknowledges that the open character of the current area within the Order Limits will be changed, but considers that, as principal infrastructure (the surviving traces of the runway, as well as the

perimeter tracks, the battel HQ and the M&E Plinth building) will be preserved, the open character can be largely restored on decommissioning. The Applicant considers that the open character of the runway area of the Airfield is still appreciable to the south of Ossington Road. The Applicant does not consider specific mitigation is required, but notes that there is an opportunity for enhancement by provision of information boards to help make the significance of the former Airfield more appreciable to visitors, including people using the permissive path that is proposed as part of the Development to run along the southern boundary of the Airfield (replacing no official public access at present).

77 NCC considers that this open character of the runway area to the west of Ossington village is an essential element of the setting (both within and outside the Order Limits) within which the significance of the former Airfield can be appreciated. NCC considers the magnitude of impact to be higher than assessed by the Applicant, and considers the significance of the asset to be harmed by the proposals, and this requires mitigation.

78 Both parties are agreed that the settings of most individual components of the wider Airfield are not significantly altered by the proposals, nor is the contribution made by them to the overall significance of the former Airfield diminished. Certain groupings with invisibility of the airfield (and DCO area) to the south east in particular (that is, south of Ossington Road), will have their setting altered.

4 MITIGATION

79 This section addresses part (c) of the Examining Authority's question.

4.1 DIRECT EFFECTS

80 Design changes may lead to preservation in situ (where practicable, and this is the preferred option) to preserve elements such as the concrete structures for the arrester gear, and investigation and recording leading to preservation by record may be appropriate for the archaeological traces of former structures located within the order limits in the northeast part of the runway area.

81 The Applicant intends to complete geophysical survey within the area previously surveyed as part of the Stage 2 works defined in the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]**. Other surveys and recording (such as recording the Battle HQ and M&E plinth structures, recording the concrete structures associated with the arrester gear etc., as well as undertaking any required evaluation trenching) as appropriate will be carried out in line with the oAMS.

82 Both Parties agree that the process set out in the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]** provides a reasonable basis by which to mitigate direct impact upon the archaeological significance of the Airfield.

83 AS noted above on 3.4, there is no requirement to physically remove or otherwise affect the M&E Plinth building or the Battle HQ. No mitigation is required, but formal controls to ensure a precautionary buffer will be identified in the Design principles and prior to any works taking place, or at Stage 2 in the process set out in the oAMS.

84 Nottinghamshire County Council would further like to retain the area of northern runway within the DCO area clear of solar panels, to retain the original alignment and sightlines to the Battle HQ from the east.

4.2 INDIRECT EFFECTS

85 The Applicant considers that there is a limited degree of harm to the setting of the Airfield, arising from the reduction in the open character of the setting at the runway areas to the west of Ossington Village. This is considered to be “minor” in significance. No specific onsite mitigation is proposed (subject to consideration of the final detailed design), although the Applicant proposes that some off-site enhancement can be considered, aimed at allowing the significance of the airfield to be better appreciated. This is further set out in the Enhancement section below.

86 NCC considers that there is harm, in that the ability to appreciate the significance of the runway area of the former Airfield, will be adversely affected by the Development, and that this requires mitigation, with a preference for removing or limiting the presence of panels within the order limits around the main runway areas, and/or design to reflect the original alignments of runways etc. (including those now removed and no longer visible on the ground). NCC also considers that options for off-site enhancement should be considered together with the above, to be provided as mitigation.

87 The Parties are not agreed on this.

5 ENHANCEMENT AND COMMUNITY VALUE

88 Both Parties recognise there is an opportunity for improving public awareness of the significance of the former Airfield and recognise the community value of the asset.

89 The **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]**. includes a process for considering public engagement with heritage, and the Applicant considers that this can be further explored in line with that process. The form of engagement and presentation will be in part determined by planned works as part of the oAMS process.

90 Specific options with regard to the former RAF Ossington asset may include provision of information boards, and aligning that to the permissive path proposed through part of the former Airfield site (and along the southern boundary of the Order Limits). Content and siting of such boards is an area where community engagement could be practically undertaken. The final form of such engagement and mechanisms to deliver it will be agreed with NCC and is secured by the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]**. and Requirement 11 **Draft Development Consent Order [EN010162/APP/3.1E]**.

6 CONCLUSION

91 This Statement sets out the position of NCC and the Applicant with respect to potential effects upon the significance of the former RAF Ossington Airfield.

92 Both Parties agree that the former Airfield is a Non-designated heritage Asset for purposes of the relevant planning tests. .

93 The Parties are not in agreement on the level of significance that the asset holds (recognising its status as a non-designated heritage asset); the Applicant considers the asset to be of local/county importance, whilst NCC considers the asset to be of regional, if not higher, importance. However, both Parties agree the asset does not meet the criteria for Scheduling, as indicated in the Issue Specific Hearings (ISH3)

94 Both parties agree that there is the potential for some harm to the archaeological interest in the Airfield, but this can be mitigated appropriately in line with the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]** process, with an emphasis on retaining in-situ the remains of WWII structures.

95 The Parties are not agreed on the level of effect on the significance of the asset through change within its setting. Specifically, this revolves around the effects on the ability to appreciate and experience the significance of the asset in relation to the current open character of the asset in the runway area (and within the Order limits) to the west of Ossington village. NCC considers this effect requires mitigation; the applicant, whilst accepting there is a limited degree of harm, is not proposing specific onsite mitigation, but considers off and on site enhancement could provide a means to allow the significance of the Airfield to be better realised and appreciable to visitors to the area. The Parties agree that there is an opportunity for community engagement and making the significance of the Airfield better able to be realised, and agree that the **ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C]**. process (which required consideration of community benefit and engagement in respect of all of the heritage impacts and specifically references the former RAF Ossington) is a starting point for considering how such benefit can be identified and delivered.

7 REFERENCES

7.1 BIBLIOGRAPHY

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- Osborne M, 2011. *Defending Nottinghamshire: The Military Landscape from Prehistory to the Present.* History Press.

7.2 HISTORIC ENVIRONMENT RECORDS AND ARCHIVES

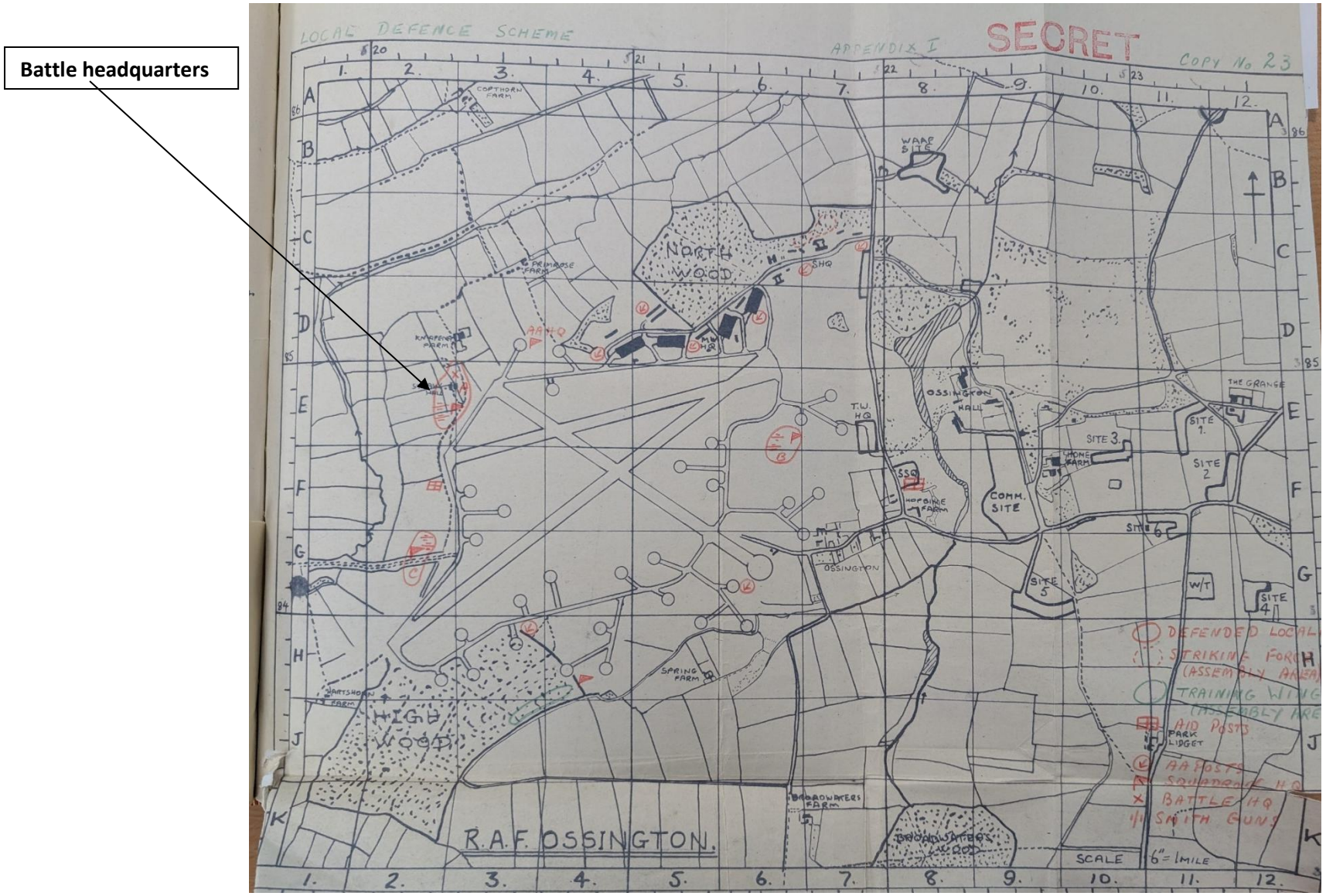
- Nottinghamshire Historic Environment Record (NHER)
- National Archives

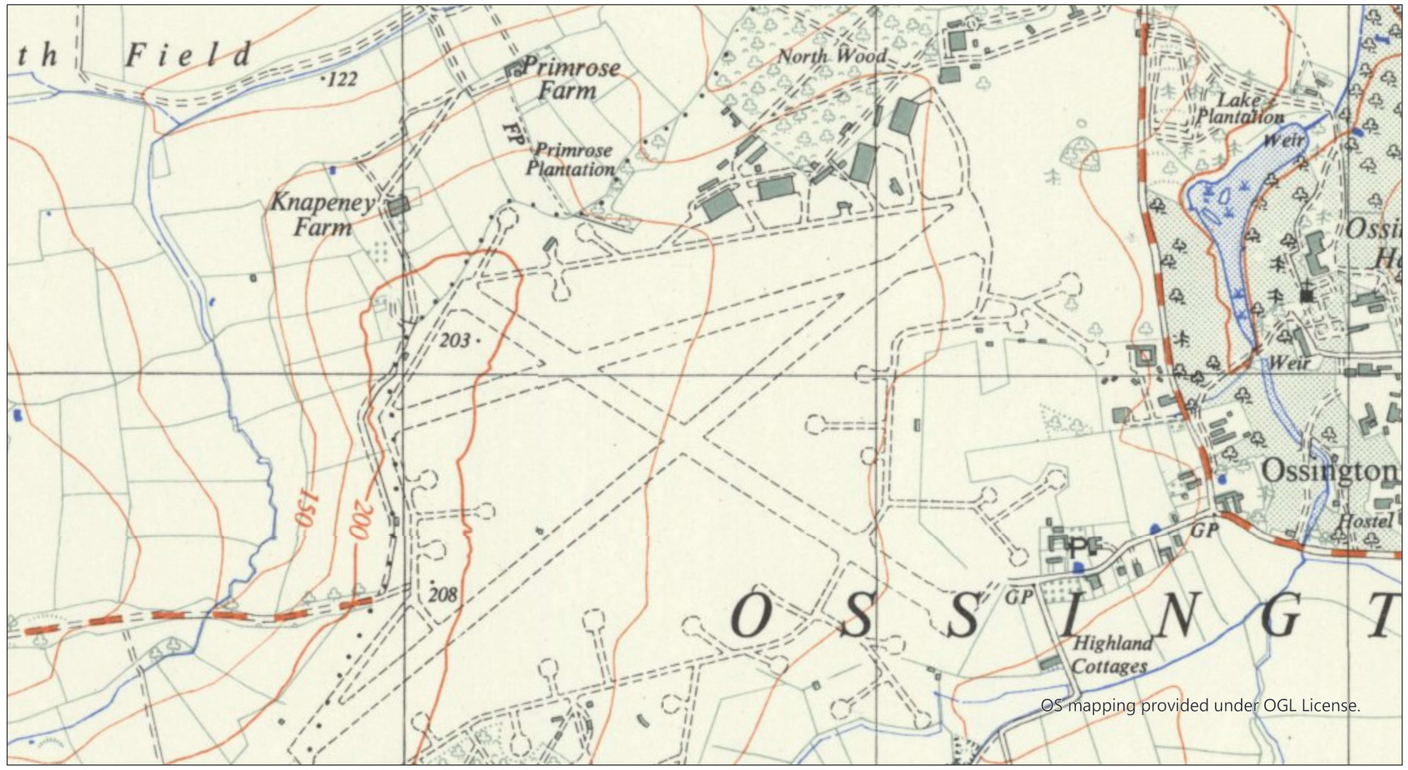
7.3 ONLINE RESOURCES

- https://www.abct.org.uk/airfields/ossington/
- http://www.ukairfields.org.uk/ossington.html
- https://aviationtrails.co.uk/the-development-of-britains-airfields/

7.4 ARCHIVAL RECORDS

96 AIR 29/687/2 - 82 Operational Training Unit (OTU). Formed at Ossington (UK) in May 1943. Contains local defence scheme and map of RAF Ossington and surroundings. With appendicesAppendix 1 1943 Plan of RAF Ossington as part of the development of Local Defence Scheme.


Battle headquarters
LOCAL DEFENCE SCHEME
APPENDIX I
SECRET
COPY No 23
NORTH WOOD
HIGH WOOD
R.A.F. OSSINGTON.
SCALE 6" = 1 MILE
DEFENDED LOCAL
AID POSTS
AA POSTS
BATTLE HQ
SMITH GUNS



Map A. OS Historic Map Revised: 1903 to 1950, Published: 1959

1:13,000 Scale @ A3

0 400 800 Meters

Map B. OS Historic Map Revised: 1958, Published: 1960

1:15,000 Scale @ A3

0 400 800 Meters

Solar & Biodiversity Park

Ref:	Date: 01/04/2026

Figure 1: OS Historic Map

Great North Road Solar and Biodiversity Park Environmental Statement

1:10,000 Scale @ A3

0 250 500 Meters

Ref:

Date: 01/04/2026

Figure 2. OS Historic Mapping Revised: 1972 to 1975, Published: 1974

Great North Road Solar and Biodiversity Park Environmental Statement