POWER FOR GOOD

# Steeple Renewables Project

Applicant's Comments on Relevant Representations

Application Document Ref: EN010163/EX/8.3

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## Acronyms

**Table 1-2: List of Acronyms**

| Acronym | Definition |
|---|---|
| NSIP | Nationally Significant Infrastructure Project |
| SoCC | Statement of Community Consultation |
| SoCG | Statement of Common Ground |
| DCO | Development Consent Order |
| NPPF | National Planning Policy Framework |
| EIA | Environmental Impact Assessment |
| BMV | Best and Most Versatile |
| GW | Giga Watt |
| BESS | Battery Energy Storage System |
| PROW | Public right of way |
| ES | Environmental Statement |
| SuDs | Sustainable Drainage Systems |
| GHG | Greenhouse Gases |
| AQMA | Air Quality Management Area |
| AQO | Air Quality Objectives |
| OEMP | Operational Environmental Management Plan |
| oDP | Outline Decommissioning Plan |
| dDCO | Draft Development Consent Order |
| oCEMP | Outline Construction and Environmental Management Plan |
| oOEMP | Outline Operational Environmental Management Plan |
| oLEMP | Outline Landscape and Environmental Management Plan |
| oCTMP | Outline Construction Traffic Management Plan |
| CEMP | Construction Environmental Management Plan |
| oDP | Outline Decommissioning Plan |
| SMP | Soil Management Plan |
| BPM | Best Practicable Means |
| NPS | National Policy Statements |
| SRN | Strategic Road Network |
| NSR | Noise Sensitive Receptors |
| EcIA | Ecological Impact Assessment |
| NCC | Nottinghamshire Country Council |
| NGED | National Grid Electricity Distribution |
| PV | Photo Voltaic |
| LLFA | Lead Local Flood Authority |
| ECoW | Ecological Clerk of Works |
| LWS | Local Wildlife Site |

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|---|---|
| LVIA | Landscape and Visual Impact Assessment |
| OSCESP | Outline Supply Chain, Employment and Skills Plan |
| SWNP | Sturton Ward Neighbourhood Plan |
| TA | Transport Assessment |
| FRA | Flood Risk Assessment |
| WFD | Water Framework Directive |
| oWSI | Outline Written Scheme of Investigation |
| ALC | Agricultural Land Classification |
| ZoI | Zone of Influence |
| ExA | Examining Authority |
| LIQ | Land Interest Questionnaire |
| CAq | Compulsory Acquisition |
| BoR | Book of Reference |

# 1. Introduction

## 1.1. Purpose of this report

1.1.1. The purpose of this report is to provide the response of Steeple Solar Farm Limited (the Applicant) to the matters raised in response to the Relevant Representations submitted by Interested Parties concerning Steeple Renewables Project (the Proposed Development).

1.1.2. The Development Consent Order (DCO) Application (the DCO Application) for the Proposed Development was submitted on 14 May 2025 and subsequently accepted for Examination on 11 June 2025. The window for submission of Relevant Representations by Interested Parties was open from DATE and until 28 August 2025. The Relevant Representations received during this period were published on the Planning Inspectorate's website on DATE.

1.1.3. A total of 57 responses were received within the Relevant Representation period.

## 1.2. Structure of this document

1.2.1. This report provides a response from the Applicant to the matters raised in the Relevant Representations and is structured as follows:

- Table 1-3 -Statutory Consultees
- Table 1-4 – Local Authorities
- Table 1-5 – Parish Councils
- Table 1-6 – Non-Statutory Organisations
- Table 1-7 – Members of the public

1.2.2. Relevant Representations received by Statutory Consultees, Local Authorities, Parish Councils and Non-Statutory Organisations are presented as summarised versions of the responses taken from Relevant Representations and are then responded to by setting out the Applicant's position on the matter at the time of writing.

1.2.3. To increase the clarity of this report and avoid repetition, similar issues raised by Members of the Public have been grouped and summarised. The "Identification Number" column in the tables refers to the reference assigned to each Relevant Representation in the Examination Library.

1.2.4. The documents submitted with the DCO Application are also referenced in this report, using the reference number [APP-X], where the numbers are the application documents number, as set out in the Examination Library. Interested Parties can search within this document using their allocated Representation Number (as provided within the Examination Library) to find a response to their representation.

1.2.5. For ease of reference, a table of acronyms used in this document is provided in Table 1-2.

**Table 1-3: List of Statutory Consultees who submitted Relevant Representations**

| ID Number | Statutory Consultee |
|---|---|
| RR-005 | The Coal Authority |
| RR-011 | National Grid Electricity Distribution (East Midlands) plc |
| RR-012 | Holcim UK Limited |
| RR-013 | Fisher German LLP on behalf of Exolum Pipeline System Limited |
| RR-016 | Leep Utilities |
| RR-021 | Trent Valley Internal Drainage Board |
| RR-023 | Anglian Water Services |
| RR-024 | Forestry Commission |
| RR-025 | Environment Agency |
| RR-027 | UK Health Security Agency |
| RR-032 | National Highways |
| RR-043 | Representation by Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited |
| RR-044 | West Burton Solar Project Limited |
| RR-045 | Historic England (HMBCE) |
| RR-046 | Representation by Burges Salmon LLP on behalf of UK Industrial Fusion Solutions Ltd |
| RR-047 | Representation by CMS Cameron McKenna Nabarro Olswang LLP on behalf of Cadent Gas Limited |
| RR-049 | Representation by Eversheds Sutherland LLP on behalf of National Grid Electricity Transmission |
| RR-053 | Representation by CMS Cameron McKenna Nabarro Olswang LLP on behalf of EDF Energy (Thermal Generation) Limited |
| RR-054 | Natural England |
| RR-055 | Nottinghamshire Wildlife Trust |

**Table 1-4: List of Local Authorities who submitted Relevant Representations**

| ID Number | Local Authority |
|---|---|
| RR-004 | Bassetlaw District Council |
| RR-030 | Newark and Sherwood District Council |
| RR-052 | Nottinghamshire County Council |

**Table 1-5: List of Parish Councils who submitted Relevant Representations**

| ID Number | Parish Councils |
|---|---|
| RR-018 | North and South Wheatley Parish Council |
| RR-029 | Sturton le Steeple Parish Council |
| RR-033 | North Leverton with Habblesthorpe Parish Council |
| RR-052 | Nottinghamshire County Council |

**Table 1-6: List of Non-Statutory Organisations who submitted Relevant Representations**

| ID Number | Non-Statutory Organisations |
|---|---|
| RR-002 | North Leverton Windmill Charitable Trust |
| RR-035 | Fields for Farming Community Group |
| RR-040 | The Society for the Protection of Ancient Buildings Mills Section |
| RR-051 | Nottinghamshire Campaign to Protect Rural England |

**Table 1-7: Members of the public**

| ID Number | Name |
|---|---|
| RR-001 | Robert Byatt |
| RR-003 | Alan Barber |
| RR-006 | Karen Hodgson |
| RR-007 | Jeanette Harris |
| RR-008 | Lee Broad |
| RR-009 | John Bowler |
| RR-010 | Adrian Peter-Conn |
| RR-014 | Stacey Attenborrow |
| RR-015 | Rebecca Copeland |
| RR-017 | Sharon McDonald |
| RR-019 | Nicola Wildgoose |
| RR-020 | Ian John Lawman |
| RR-022 | Mr & Mrs Barlow |
| RR-026 | Lynn Clapperton |
| RR-028 | Robert Jenrick MP |
| RR-031 | Simon Andrew Frankish |
| RR-034 | Bartle Brothers |
| RR-036 | Peter Warburton |
| RR-037 | Yvonne Hodgson |
| RR-038 | Geoffrey Miller |
| RR-039 | Emily C Byatt |
| RR-041 | Barry Haywood |
| RR-042 | Robert Joseph Fleming |
| RR-048 | Bev Fullwood |
| RR-050 | Ruth Edwards |

# 2. Responses to Relevant Representations

## 2.1. Local Authorities

### Table 2-1: Nottinghamshire County Council

| ID | Theme | Verbatim Comment | Response |
|---|---|---|---|
| RR-052/1 | Ecology and Biodiversity | We have some concerns in relation to the proposed enhancements, namely the works which will be undertaken to complete the enhancements in the biodiversity mitigation areas as further species surveys have largely been omitted from the biodiversity areas, which may be impacted by these proposed enhancement works i.e. works to watercourses, other habitat creation works.<br><br>Clarification is required on the methodology used for the aquatic invertebrate surveys, as only one survey occasion was completed for each waterbody. This approach does not seem sufficient as one survey occasion for each waterbody is very limiting and any environmental conditions i.e. such as the drought this year may impact the results or provide an inaccurate overview of the species present. | All parts of the Ecological Mitigation Areas (**Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160]**) have been subject to extended habitat surveys and condition assessments. All ditches/streams in the Ecological Mitigation Areas have been subject to condition assessments and have undergone spot checks by ecologists for riparian mammals. Survey effort was reduced in areas where no changes or adverse impacts from development were anticipated. This is in line with industry guidance, for example for bats: Figure 2.1 of the Bat Conservation Trust Good Practice Guidelines (4th edition) indicates that no further bat survey is required where there is no reasonable likelihood that bats could be impacted. Therefore, the Applicant does not view that there have been any unjustified omissions of surveys.<br><br>The main works to be undertaken in the Biodiversity Mitigation Areas include planting, pond creation, and ditch and wet scrape creation.<br><br>Aquatic invertebrate surveys were undertaken on selected watercourses based on the desk study which identified local wildlife site (LWS) interest for aquatic invertebrates. It is |

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| | | | anticipated the Proposed Development would result in a beneficial effect to the aquatic invertebrate assemblage through adjacent land use management changes (**ES Chapter 7 - Ecology and Biodiversity [APP-065]**). The aim of surveying was to establish a baseline against which future monitoring can be compared to confirm whether / how the Proposed Development results in changes to the assemblage, but with consideration to the prevailing weather conditions. There is no set guidance for survey of ditches for aquatic invertebrates. It is noted that streams would typically be subject to a spring and autumn survey, but those with lentic environment like ditches would typically be subject to a single visit in summer. A single visit in summer is considered to be appropriate to inform the application. It is acknowledged that dry conditions were observed in 2025, and that wet conditions were prevalent in 2024 (when the survey was undertaken) - these fluctuations are part of the natural variation of the ecological baseline but will be taken into account when comparing data year-to-year in future monitoring assessments. |
| RR-052/2 | Ecology and Biodiversity | The Environmental Statement (ES) chapter considered that both mink and water vole are present in low numbers at the site, yet no mitigation or enhancements specifically for these species has been provided, other than watercourse enhancements, which form part of the BNG works. We would like to see some enhancements proposed specifically for water vole, such as the commitment to the control of mink (an invasive non-native | Following consultation with the Internal Drainage Board (the Trent Valley Internal Drainage Board) , Environment Agency and Lead Local Flood Authority (Nottinghamshire County Council), it was determined that direct enhancements to existing ditches were not preferable due to the possible implications on water conveyance and flood risk, and only bank top management would be changed as a result of the Proposed Development. It was determined instead that a network of independent ditches |

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| | | species) and possibly some of the waterbodies enhanced specifically for water vole. | would be created in the eastern Ecological Mitigation Area (shown on Sheet 6 of **Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160]**) to provide enhancements. Recommendations regarding the Steeples Renewables Project providing mink control measures have been noted and will be discussed to determine feasibility and whether any agreements can be made. However, this is not likely to be feasible in the drains that are primarily used for flood conveyance. This has not been included as an enhancement measure in **ES Chapter 7 – Ecology and Biodiversity [APP-065].** |
| RR-052/3 | Ecology and Biodiversity | The ES chapter states "The design of the Proposed Development is such that no direct impacts on habitat that could be used by roosting or nesting barn owl will be affected. The need for further survey will be assessed once the construction detail and timing are known, and if the risk of disturbance of a barn owl becomes a possibility". At this stage the construction detail and timing should be known and therefore the requirement for further surveys. | It is confirmed that all potential nest sites identified on site will be retained and protected during the Proposed Development. Further survey will be undertaken prior to (and during) construction to identify which potential nest sites are occupied in a specific breeding season and whether further protection measures are required in response to this to prevent disturbance. This process has been specified in Table 3.3 of the **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089].** Requirement 7 of the DCO ensures that the final CEMP will include measures to be applied, and must accord with the oCEMP, but the process will be kept under review by the Applicant's ecologist, in liaison with relevant stakeholders, to ensure appropriate responses if the situation changes.<br><br>Requirement 7 ensures that the final CEMP is submitted to and approved by the LPA in consultation with the EA and NE. It will include measures that will ensure the construction programme is |

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| | | | reviewed by the project team to identify where construction activities near potential nest sites cannot be feasibly postponed until after the breeding period, and whether any potential nest sites may need to have barn exclusion measures fitted and compensatory nest sites provided so that no disturbance offence is committed on breeding barn owl. Therefore, the interaction of the Proposed Development with barn owls is considered to be appropriately managed. |
| RR-052/4 | Ecology and Biodiversity | We require further clarification on badger setts as the impact assessment and mitigation and enhancement sections within the ES Chapter contradict each other. In addition, we would like to see proposed mitigation for this species i.e. buffer zones and gaps in fences with the current known badger setts/evidence of badger (e.g. mammal paths) mapped on a plan. Mammal gaps should also benefit other species observed at the site such as brown hare. | Section 7.8.165 of **ES Chapter 7 – Ecology and Biodiversity [APP-065]** is considered to be accurate and the previous section 7.8.158 is superseded – some badger setts may be closed (under licence) to protect badgers from possible injury but the need for this will depend on the detailed design of the Proposed Development, and the status of each sett at the time (which will be determined through updated badger survey work). The Applicant will update the ES accordingly during the examination. Avoidance zones have been built into the design and adhered to in almost all cases (a total of 80 sett features have been recorded). No infrastructure will be placed directly over a sett; however, based on the current designs and distribution of badger activity, a number of sett protection areas (i.e. avoidance buffers) cannot be wholly avoided and will require further mitigation measures. The scale of the interactions are anticipated to change based on the mobile nature of badgers and their ability to create new setts over time, but also as a result of avoidance measures that will be incorporated during the detailed design of the Proposed Development (such a micro-siting fence |

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| | | | lines or using no-dig techniques). Currently predicted interactions between badger protection areas and proposed infrastructure, based on the current design and status of badger setts, include:<br>• One main sett (sett [redacted] where an existing farm track will be modified to accommodate construction traffic within 30m of the sett. The degree of groundworks needed will be assessed prior to construction and minimised where possible. Otherwise, further mitigation such as closing the sett under licence and providing a compensatory setts will be provided – as specified in the **oCEMP [APP-089].**<br>• Two subsidiary setts [redacted]) will have fencing installed 23 m and 24 m from the sett entrances respectively. Further assessment of the tunnel directions and local topography will be undertaken (as per Table 3.3 of the **oCEMP [APP-089]**) to determine the risk to these setts and whether any further mitigation is required.<br>• 13 outlier sett protection areas may clash with infrastructure - 6 of these are attributed to cable corridors, which have not yet been designed in detail and which may be possible to microsite away from badger setts. The remaining outlier setts potentially clash with security fencing and these will be considered further following updated survey and consideration of |

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| | | | detailed fencing options to minimise the need to close any of these outliers.<br>The locations of the mammal gaps in the fence will be determined by an Ecologist based on up-to date survey data ahead of construction. This commitment has been secured via Requirement 7, which ensures a CEMP will be prepared that accords with the oCEMP. Table 3.3 of the **oCEMP [APP-089]** says "*Mammal gaps will be incorporated into fencing (security fencing and perimeter temporary fencing) to allow continued movement of badger through the Site.*". It is anticipated that reinforced gaps will be created in the fencing instead of gates, as these allow other smaller mammals, such as hedgehogs and brown hare to pass though and are less likely to get jammed shut. |
| RR-052/5 | Ecology and Biodiversity | No impact assessment for this invasive species has been provided. We would like to see some mitigation as part of the enhancements for these species – e.g. the removal and control of Canadian waterweed. Over time this species could naturally spread into other watercourses across the site, and we would be keen to remove this issue before it becomes a wider ecological issue across the site and local area. | Following consultation with the Internal Drainage Board (Trent Valley Internal Drainage Board), Environment Agency and Lead Local Flood Authority (Nottinghamshire County Council), it was determined that changes to the vegetation management of the existing ditches and watercourses were not preferable due to the possible implications on water conveyance and flood risk, only bank top management would be changed as a result of the Proposed Development.<br><br>Construction for the Steeples Renewables Project will be undertaken in line with biosecurity controls to be detailed in the final CEMP to minimise the risk of spreading INNS – Requirement 7 of the DCO ensures that the CEMP will be prepared and that it will be in accordance with the **oCEMP [APP-089]**. The **oCEMP** |

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| | | | **[APP-089]** also includes measures for monitoring watercourses within the Site, including monitoring of INNS, which is information that can be shared with the watercourse operators. This will fulfil the Applicant's obligations to comply with the Wildlife and Countryside Act 1981 (as amended) regarding invasive weeds. In the absence of further legal obligations or guidance, no further control of invasive weeds is required. |
| RR-052/6 | Ecology and Biodiversity | We also have concerns about impacts on skylarks. The ES chapter estimates that mitigation, as set out in the Skylark Mitigation Strategy, will mitigate approximately 55% (against the 2023 total of 105 territories) to 64% (against the 2024 total of 90 territories) of the territories to be displaced by the proposal solar infrastructure. This is assessed as an adverse residual effect significant at a Local level, as well as an adverse cumulative effect significant at the Local to District level. It is indicated that some further habitat creation will provide 'secondary biodiversity benefits' including providing nesting habitat for skylark, as listed in para 4.8 of the Skylark Mitigation Strategy, which will further increase the total number of post-development skylark territories, but this is not quantified.<br>It would be useful to attempt to do this, whilst recognising the constraints in doing so. Nevertheless, it is apparent that a residual impact on this Red Listed (but still widespread) species would remain. | It is estimated conservatively using the approach put forward by Fox (in CIEEM, 2022, *Blithe Spirit: Are Skylarks Being Overlooked in Impact Assessment?* In Practice. Issue 17, 47-51), that an additional 5-6 skylark territories are likely to be delivered by selected secondary habitats ('selected' in this case means that small/narrow grasslands and areas with overhead lines have been excluded from the estimate – see the 'Further information relating to Skylark mitigation' section provided below this table of responses for further information). When considering these additional territories, the estimated number of territories mitigated for increases to at least 64, which is equivalent to 60-71% of the baseline amount.<br><br>Further information on the conservative estimation methods and associated assumptions is provided below this table (see 'Further information relating to Skylark mitigation' section below). |
| RR-052/7 | Decommissioning / Ecology and Biodiversity | We require more information in relation to the Decommissioning proposals, whilst appreciating that not all impacts are known at this stage. We would like to understand the level of monitoring | Due to the scale of the Site, it is likely that year-round works to remove arrays would be required on decommissioning. Requirement 21 of the **dDCO [APP-041]** states that prior to |

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| | | and surveying proposed to inform the impacts prior to decommissioning. In addition, we would want to see that no decommissioning works are undertaken within nesting bird season and this secured, as the mitigation for ground nesting skylark should increase the number of territories and nests across the site. | decommissioning, a Decommissioning Plan must be served with the local planning authority. Requirement 21 requires that the Decommissioning Plan must include details of measures to be adopted including pre-decommissioning surveys to protect species defined as EPS, and details of methods of species protection. |
| RR-052/8 | Decommissioning | We would also like some indication about expectations for the Site once the decommissioning has been undertaken, such as whether it will put back into its original use and whether areas such as the grassland margins around the solar arrays and mitigation areas be lost. | All infrastructure will be decommissioned. After this, it is not possible to predict the future agricultural use, and any post-development habitat impacts brought about by the landowner modifying or removing or creating different habitats is similarly not predictable at this stage. The development is consented for 40 years. After the development is decommissioned, there is no ongoing requirement for mitigation.<br><br>Further details are provided in the **ES Appendix 4.2 - Outline Decommissioning Plan [APP-090].** Requirement 21 of the **dDCO [APP-041]** secures further decommissioning and restoration details. |
| RR-052/9 | CEMP/ ecology and Biodiversity | In relation to the outline CEMP – there are a few sections in the ecology table which state “These measures are described within the outline CEMP”. These statements and the lack of details within this document need to be reviewed and updated, as currently the outline CEMP does not provide enough details. In addition there are the following issues which need rectifying/adding to the proposed mitigation: | Requirement 7 of the DCO ensures that a CEMP will be prepared prior to works commencing, and that CEMP must be in accordance with the **Outline CEMP [APP-089]** and that the final CEMP must be approved by the local authority before works start.<br><br>Table 3.3 of the Outline CEMP specifies that: |

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| | | • The proposed nesting bird surveys, should they be required in nesting bird season, must be undertaken by a suitably qualified and experienced ecologist.<br>• In relation to reptiles and amphibians, a directional two-phase cut (with 24 hours left between the two cuts) of the suitable vegetation should be undertaken rather than just progressive removal. This more precautionary approach should be undertaken as no reptile surveys were undertaken and therefore the distribution and populations of any reptiles at the site is currently unknown.<br>• Specific hand searches for reptiles, amphibians and hedgehogs should be undertaken immediately prior to any dense vegetation removal works, i.e. hedgerows, tussocky grassland, scrub etc where these species could utilise as refuge or hibernation/breeding sites. This must be undertaken by a suitably qualified and experienced ecologist.<br>• A buffer plan for the entire site should be made available for review. This would make the buffers easier to understand and implement for the contractor prior to the start of the construction works.<br>• A 'dark corridor plan' should also be produced, where no artificial lighting will be present (temporary or permanent) to protect light-sensitive (i.e. | • An Ecological Clerk of Works (ECoW) is required regarding nesting bird considerations – and that specific responsibilities will be confirmed in the final CEMP.<br>• Vegetation removal will be undertaken in liaison with an ECoW. The final CEMP will elaborate on the details of areas that require specific working methods, which will include two-stage cuts and/or hand searches for certain habitat types and locations.<br>• Protection buffers will be applied for habitats and species. A detailed plan of these will be developed to inform operations on the ground. However, it is noted that pre-commencement checks may influence the location of protection buffers after the CEMP is approved by the local council, so the Outline CEMP specifies that the ECoW must keep written records of activities undertaken.<br>• Construction lighting will be located to avoid illumination of trees, buildings and areas that may be important for barn owl, bats and badgers. It is anticipated that a plan of such areas will be provided in the final CEMP to help communicate the constraints to the Site staff.<br><br>Therefore, it is not considered necessary to update the application documents, such as the ES chapter or outline CEMP, as there is a requirement for the final CEMP to provide additional details, and that it will be submitted for approval prior to work commencing on Site. |

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| | | potential bat roosts, barn owl roosts, badger setts etc.). | |
| RR-052/10 | Landscape | In relation to the outline LEMP, there are details missing within this document, with sections stated to be provided in detail as part of the final LEMP. We will review and provide further comments on this document once all details are known, but currently we broadly agree with the outline creation and management prescriptions provided. In addition, we would like to see proposals for areas of tussocky grassland to benefit amphibians and reptiles but also provide more barn owl foraging habitat across the Site. | This comment has been noted by the Applicant. It is intended that grassy margins will be enhanced to be wider and more tussocky/seed rich so that they will be suitable for small mammals and amphibians, which in turn will also favour barn owl foraging. The framework for this is outlined for 'Feature 1' in the **Appendix 7.14 Outline Landscape and Environmental Management Plan (oLEMP) [APP-116],** which includes the following in the management vision *"These habitats will provide suitable habitat for a range of mammal species such as badgers, brown hare and also small mammals upon which birds of prey such as barn owl hunt."*<br><br>Requirement 6 of the DCO ensures that the final LEMP will be in accordance with the **oLEMP [APP-116]** submitted to and approved by the local planning authority in consultation with Natural England. |
| RR-052/11 | Landscape | Further, having reviewed the Figure 6.9 Landscape and Ecological Mitigation Strategy plans, it is noted that some changes have been made to the Eastern Mitigation Area to reflect discussions held in March 2025, particularly in relation to the floodplain grazing marsh area to the north of Littleborough Lagoon. However, a number of further suggestions have not been adopted, and an explanation for this is required. In particular, it was requested that: | It is acknowledged that the measures proposed (summarised below) do not maximise the likelihood of use by ground-nesting birds. However, the approach to enhancement of the land in question does respond to the opportunity to enhance the interest of the Mother Drain Local Wildlife Site (LWS), a site of county-level importance. Measures include creation of grassland plots, hedgerows, ponds, and scrub patches. The primary purpose of the patches of scrub next to the proposed ponds in the centre of the Eastern Biodiversity Mitigation Area is to |

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| | | • The two scrub blocks should be removed from the 'inverted V' grassland areas in the centre of the Eastern Mitigation Area, to maximised the likelihood of ground nesting birds, including species such as Lapwing, using this area. The scrub can be relocated to peripheral areas.<br>• Consideration be given to consolidating grassland areas in the Eastern Mitigation Area into one larger block on the eastern side of this area to give ecological benefits as well as potentially simplifying management. | enhance the area for aquatic invertebrates, which will complement the adjacent Local Wildlife Site features. Review of ideal habitats for the notable invertebrates identified leaf litter as an important resource to the invertebrate species, and taller vegetation with glades as providing basking habitat. Hedgerows have also been proposed to enclose this area, to clearly demarcate the extent of agricultural operations and to protect the grassland from adjacent farming activity; as well as to enhance the linear corridor for animals such as bats and otters. The allocation of grassland is based on the existing field layout, access ways and topology – the presence of drains and existing crossing points plays a key part in how fields are divided. The bank top areas of Mother Drain are proposed to be converted to grassland to enhance the watercourse quality, and therefore it is not proposed that these grassland plots should be reallocated to the east of the Site.<br><br>It is accepted that neither the proposed scrub or hedgerows near Mother Drain are conducive to encouraging lapwing to this area; however, the floodplain grazing marsh is proposed to be managed to be more suitable for lapwing nesting (creating scrapes, conservation grazing/mowing of grassland).<br>Overall, the grasslands have not been consolidated into one large plot because these grasslands primarily address other needs for habitat relating to watercourses and aquatic invertebrates, although other beneficial measures for lapwing are possible |

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| | | | (creation of scrapes and conservation management of the floodplain). |
| RR-052/12 | BNG | Biodiversity Net Gain (BNG) as it is not a mandatory requirement for NSIPs, and a BNG metric spreadsheet was not available for review at the time of the most recent submission; therefore, more detailed comments will be provided at a later stage.<br>• The BNG proposals and approach to the assessment is well considered and detailed with relevant justifications provided where necessary. Overall, there is proposed to be a net gain for all habitat types, which is to be expected for a solar scheme. There are a couple of clarifications which we would like provided in relation to **6.3.7 Appendix 7.12 Biodiversity Net Gain, Chapter 5 [APP-114]**<br>• Individual trees are not recorded separately within the baseline value as they will be retained, except for potentially irreplaceable (veteran) trees, which have been precautionarily listed within the SBM (see irreplaceable habitats subsection in section 4). Does this mean that any individual trees other than the "irreplaceable" trees have not been included, or that any trees within hedgerows have not been included?<br>• Hedgerow assessment – we agree with the desk-based approach in principle, but would like clarification if the hedgerows which are to be impacted (i.e. areas removed for access) were also subject to condition assessments? Section 5 reads as if | Almost all trees on site are associated with hedgerows, with the exception of a handful such as those in the West Burton Power Station land in the north of the Site. These individual trees have also been recorded in the metric.<br><br>Not all hedgerows that will be impacted have been subject to the assessment methodology set out in the Hedgerow Survey Handbook (Defra, 2007. *Hedgerow Survey Handbook A standard procedure for local surveys in the UK,* second edition), as they were not identified as having moderate-high species diversity during preliminary surveys; therefore, detailed sampling of the species density via the Hedgerow Survey Handbook methodology would not influence the outcome of the Hedgerow Regulations 1997 assessment or BNG assessment (as it had already been confirmed that the hedgerows did not have sufficient woody species across either their entire length, or within 30m samples, as the methodology would consider). A total of 88 of the 197 hedgerows – contained sufficient numbers of species to warrant further verification via the Hedgerow Survey Handbook methodology. The remaining hedgerows were mostly hawthorn dominated.<br>The design of the site has minimised loss of higher distinctiveness habitats where possible, and the hedgerows that did not qualify for full Hedgerow Survey Handbook assessment will experience some losses. However, the hedgerows that will be |

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| | | only the hedgerows with five or more species were surveyed, which might not include those to be directly impacted.<br>• In addition to the above clarifications, we would like more details in relation to the proposed watercourse enhancements as currently it's not clear what enhancements are proposed at which watercourses and whether they will further impact protected species. | impacted have been assessed to a sufficient level of detail to inform the assessment – they were subject to habitat survey as well as being subject of the desk-based assessment (which included ecologist review of the arboricultural survey data, which fully assessed all hedgerows).<br><br>Following consultation with the Internal Drainage Board (the Trent Valley Internal Drainage Board), Environment Agency and Lead Local Flood Authority (Nottinghamshire County Council), it was determined that direct enhancements to existing ditches were not preferable due to the possible implications on water conveyance and flood risk. Only bank top management would be changed as a result of the Proposed Development. The Applicant, in liaison with the consultees, determined that a network of independent ditches would be created in the Eastern Biodiversity Mitigation Area to provide enhancements (as shown on Sheet 6 of **Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160]**). |
| RR-052/13 | Water and Flood Risk | NCC is in the process of reviewing the relevant sections of the submitted Environment Statement, Flood Risk Assessment and Surface Water Drainage Strategy and will comment further on the impact on local flood risk relating to surface water and ordinary water courses in its Local Impact Report, following a detailed review. At this time, based on a general and an initial review undertaken to date, the Lead Local Flood Authority (LLFA) does not have any substantive concerns to raise. | Paragraph 3.1.4 of the **Surface Water Drainage Strategy [APP-120]** identifies Nottinghamshire County Council as the Lead Local Flood Authority (LLFA) who are responsible for Ordinary Watercourses that do not fall under the Internal Drainage Board's jurisdiction. The River Trent is a main river and therefore falls within the Environment Agency's control.<br>It is noted that the LLFA don't have any substantive concerns to raise. |

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| | | • However, the LLFA would raise the following matters for the attention of the applicant:<br>• It is mentioned that the IBD and LLFA have been consulted but minutes have not been provided within the document<br>• Drainage exceedance route/flows are not discussed (the proposed discharge rates are quite low so blockage of outfalls may be a higher risk)<br>• Firewater volume is stated but the source reference is not detailed NCC would recommend that the above matters are addressed through updated documentation. | IDB and LLFA minutes are contained in Appendix E to the submitted **Surface Water Drainage Strategy [APP-120]**. Drainage / exceedance flow route drawings can be provided at the detailed design stage, secured by requirement 16 (Surface and Foul Water Drainage) of **dDCO [APP-041]**. Currently Requirement 16 secures that the local planning authority will approve the written details of the surface and foul water drainage system. Requirement 16 does not secure the consultation of Nottinghamshire County Council. The Applicant would be happy to engage further with Nottinghamshire County Council to discuss whether amendments need to be made to Requirement 16 to secure consultation with Nottinghamshire County Council, in accordance with their functions. However, in the event of basin exceedance or blockage of the basin outfalls flows would be conveyed overland the short distance between the basins and the receiving watercourses, following local topography. The risk of blocked outfalls is not high.<br><br>Firewater volumes were sourced from NFCC (UK National Fire Chiefs Council) Grid Scale BESS Planning – Guidance for Fire and Rescue Services Document. This can be added to the **Surface Water Drainage Strategy [APP-120]** that will be revised as part of the Examination process.<br><br>Requirement 16 of the **dDCO [APP-041]** secures additional Surface and Foul Water Drainage details are approved by the |

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| | | | local planning authority prior to commencement of the authorised development. |
| RR-052/14 | Historic Environment | Nottinghamshire County Council supports the views of Bassetlaw DC heritage as follows:<br>• Setting of Littleborough SAM: The amended details show that the area around the Littleborough Roman Town Scheduled Ancient Monument (SAM) has now been removed from the project. This is very much welcomed as it would help to preserve most of the significance of the SAM. The detached area to the west of the proposal site, north of Caddow Wood, has also been removed. As illustrated on the contour map on previous comments, that area was considerably higher (above sea level) than the surrounding landscape so development on that site was likely to have a considerable impact. Again, the removal of that site is welcomed.<br>• Setting of Crow Tree Farm listed building: Land South of Station Road and west of Crow Tree Farm – Here there is a public footpath which goes in a NW to SE direction, which affords views towards 3 prominent local landmarks in the village, all listed, namely the curtilage-listed former agricultural building range next to Crow Tree Farmhouse (now called Oak Barn, Crow Tree Barn and Millers Barn), West End Farm (including its curtilage-listed barns), and the Church of St Peter & St Paul. The open views along this footpath form a key part of the setting of those Listed | • As shown by the **Landscape Masterplan [APP-160]**, the Proposed Development will be situated to the west of the NW-SE footpath, with planting around parcels of Proposed Development, views from this footpath towards the Grade II Listed Crow Tree Farmhouse, other designated assets within the village, will not therefore be affected.<br>• The responses notes that the *"open views along this footpath"* form a key part of the setting of the identified Listed buildings, however as stated, this NW-SE aligned footpath is notably not a direct route to/from Sturton le Steeple, or assets within it. It does not run directly to or from the cluster around Crow Trees Farmhouse, or directly to the Church of St. Peter & St. Paul and in fact bypasses them entirely.<br>• The Grade II* Listed Church of St Peter is assessed in detail in **ES Chapter 9: Cultural Heritage [APP-067]), and Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122].** This includes an assessment of setting and views. Views from the identified footpath are not considered to be key or important views. The church tower is a prominent feature in the landscape and given the location of the Proposed Development to the west of the PRoW, the amount and extent of the tower visible today will not be changed as a result of the Proposed Development – the same amount will be visible along the same portion of the route. |

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| | | Buildings, especially the church, and the addition of solar within that immediate area would fail to preserve their setting. It is therefore recommended that the area to the north of the dotted line shown on the attached plan be removed from the proposal, to better preserve the setting of those important Listed Buildings.<br>• Setting of grouping of listed buildings along Main Street North Leverton: in the land adjacent Manor Grove, North Leverton there is a public footpath that runs through this site. The open countryside contributes to the rural setting of the heritage assets along Main Street and it is therefore recommended that this area be taken out of the proposal.<br>• General concerns which remain to be addressed further relate to the impact on wider setting of heritage assets outside of the 3km boundary (including North Leverton Windmill); | • With regard to the Grade II Listed Crow Tree Farmhouse, A review of the planning history for the former range of agricultural buildings (comprising Oak Barn, Pond House, and Millers Barn) demonstrates that the Local Authority have previously identified these structures to be Curtilage Listed in association with Grade II Listed Crow Tree Farm, under Section 1(5) of the 1990 Act. This results from the date of the former agricultural buildings and their historic associative connection with Crow Tree Farm. This legal classification does not, however, result in the buildings being statutorily designated in their own right, nor of being of equal significance to Crow Tree Farm. Furthermore, when considering potential impacts on the Curtilage Listed structures, the consideration should be whether such change (be that physical or via a change in 'setting') alters the contribution which they make to the designation as a whole. In this context, the rationale behind the designation is the architectural and historic interest of the physical fabric of Crow Tree Farm. The former range of buildings were converted into residential dwellings c.2000 and are no longer ancillary to Crow Tree Farm in regard to their use, nor are they within the same ownership. The new residential dwellings each have their own clearly demarcated domestic demise, and the grouping reads separately to that of Crow Tree Farm, which is also situated within its own defined demise. Accordingly, the legible connection between Crow Tree Farm and the former buildings can be considered to |

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| | | | have diminished. Collectively, the range of former farm buildings are recorded as modern house by the Nottinghamshire Historic Environment Record (HER) and this is referenced (ref. MNT24869) in the relevant table in Appendix 1 of **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. The Grade II Listed Crow Tree Farm is included within Appendix 1 of the Cultural Heritage Technical Baseline and was considered but was not taken forward for further assessment. The building is currently in use as a residential property and is best appreciated from its immediate vicinity, with the building's primary façade facing northwards towards Station Road. The key elements of the asset's setting are considered to comprise the associated gardens and paddocks to the south, the historically associated agricultural buildings and, to a lesser degree, the immediately surrounding agricultural land to the south, which provides rural context to this former farmhouse. All these elements will be unaffected by the Proposed Development.<br>• A PRoW is not a heritage asset and therefore views from a PRoW of an asset are only important if they contribute to the significance of the asset.<br>• The referenced public footpath runs along the southern extent of the Order Limits before continuing eastwards/south-eastwards for *c.*480m across open land outside the Order Limits, before entering North Leverton along a trackway east of Manor Grove. As shown by the |

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| | | | **Landscape Masterplan [APP-160],** the Proposed Development adjacent to the footpath will set behind proposed native hedgerow planting, and the Proposed Development will not occupy land between the footpath and North Leverton. All assets along Main Street were considered within Appendix **9.1 - Cultural Heritage Technical Baseline [APP-122],** however excluding the Grade I Listed Church of St Martin, these were not taken forward for further assessment as it is not considered that the Proposed Development would have any adverse effects/harm to the significance of these assets through changes to setting. It is noted that no specific assets are mentioned in the response, nor is any rationale given as to why land within the Order limits contributes to any assets' significance through setting, other than a general reference to *"rural setting"*.<br><br>Within the Scoping Report from PINs **[EN010163/APP/6.3.1]**, there was no indication or concerns from any consultee that this 3km study area was not acceptable – North Leverton Windmill was referred to but this asset has been assessed within the documentation. The Grade II* Listed North Leverton Windmill lies *c.*260m south of the Order Limits (within the 3km buffer) and has been assessed in **ES Chapter 9 - Cultural Heritage [APP-067]**, and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. As noted in the methodologies accompanying these documents, consideration was given to assets beyond the study areas, however no assets beyond the |

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| | | | 3km study were identified whose significance had potential to be harmed by the Proposed Development. It is noted that no specific assets beyond the 3km study area (other than the North Leverton Windmill mentioned above), have been identified by the consultee. |
| RR-052/14 | | Having reviewed the submitted documents; the Council continues to have profound concerns regarding the level of archaeological assessment undertaken to inform the applicants DCO application.<br><br>We acknowledge the applicant's assessment work to date, including a desk-based work and a geophysical survey (magnetometry).<br><br>Our concern is primarily focused on the total lack of evaluation trenching which is key to assessing significance of archaeological remains and is the only mechanism to establish the presence, extent, depth, date, character, location and state of preservation of archaeology recorded in both the desk base work and geophysical surveys. It also fails to adequately test areas where these previous techniques have not been successful in identifying archaeological remains.<br><br>While some of these concerns can be addressed through a robust programme of investigation work post-consent, we would expect that at the application/examination stage, the applicant at least would have evaluated those areas that they themselves have | A clear, staged approach to archaeology has been set out which is considered to be appropriate and proportionate.<br><br>A programme of trial trench evaluation has been undertaken to target 'fixed' areas of large-scale development (**ES Appendix 9.4 – Written Scheme of Investigation for Pre-Determination Trial Trenching [APP-125])** with further trenching and/or mitigation to be undertaken post-determination (**ES Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126**]). As per current consideration of solar schemes and archaeological requirements and investigation, this is a proportionate and appropriate response. The inherent flexibility of solar scheme means that archaeology can be addressed in an appropriate manner in the post-consent phase of works.<br><br>As noted above an initial phase of trial trenching has been undertaken with further trenching proposed post-determination. The consultee response mischaracterises the approach the Applicant has taken to areas of archaeological significance. The Applicant has clearly and demonstrably taken these areas of high archaeological significance into account throughout the design |

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| | | identified as have having significant archaeological potential and those areas of highest development impact.<br><br>The applicant has already removed 4 areas of high archaeological potential identified in the geophysics results and 1 area from the desk-based work, which is welcomed. However, it is likely that the areas identified extend further than indicated by the survey results and the extent of these preservation areas should be determined through a combination of the survey results and targeted trial trench evaluation.<br><br>The applicant does provide for a programme of post-consent investigation work as well as outline mitigation which is also welcomed. However, the detail on this has not been provided in the application, necessarily due to a lack of basic evaluation work.<br><br>Many of the assessments relating to impact and proposed mitigation are based on insufficient data and are at best vague and unreliable.<br><br>The Council maintains that the applicant's approach to assessment of buried heritage is fundamentally flawed, it does not meet policy requirements and lacks the necessary detail required to provide a reliable assessment of significance and impact. We will provide more detailed comments on this for the Local Impact Report. | process, which the consultee acknowledges below. Areas of the Site, considered to have the highest potential for significant archaeological remains have been avoided through the design of the Proposed Development, so as to preserve these remains *in situ*. An Archaeological Mitigation Strategy (**ES Appendix 9.3, [APP-124]**) provides further information with regard to these areas and the methodology for ensuring preservation.<br><br>As noted above, post-consent trial trenching is proposed, which will inform any further mitigation. This is outlined in **ES Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126**], which provides for a variety of mitigation measures, including *in situ* preservation, should it be appropriate. It is through this mechanism that results of further trial trenching can be taken into account within mitigation proposals – the flexibility of solar as a technology allows this to take place. This approach is entirely in line with current approaches to archaeology and solar schemes.<br><br>The documentation prepared for the submission presents an overview of requirements and is clear to state that detailed WSIs will be required and the mitigation required will be discussed and agreed with the LPA as part of this process. The inherently flexible nature of the Proposed Development across the remainder of the Site is considered to allow for a range of mitigation options to follow on from further trial trenching, as |

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| | | | outlined in ES **Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**.<br><br>Assessments relating to impact are based on the evidence and further investigations with regard to large-scale, 'fixed' elements of development, as outlined in (**ES Appendix 9.4 – Outline Written Scheme of Investigation for Pre-Determination Trial Trenching [APP-125]**). This application was supported by:<br>• A review of Historic Environment Record (HER), Portable Antiquities Scheme (PAS) and National Heritage List for England (NHLE) data;<br>• A review of historic maps and documentary sources;<br>• Aerial photograph review and analysis;<br>• A review and analysis of LiDAR data;<br>• A geo-archaeological review;<br>• Site walkovers; and,<br>• A geophysical survey.<br>The approach taken is fully in-line with NPS EN-1 and EN-3, and with current approaches to archaeological assessment and solar schemes, including draft guidance published by the Chartered Institute for Archaeology, in partnership Solar Energy UK, Historic England, CADW, the Association of Local Government Archaeological Officers, and the Federation of Archaeological Managers and Employers (Archaeology and Solar Farm: Good Practice Guide – Consultation Draft, August 2025). |

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| | | | It is considered the flexible nature of the Proposed Development and its impacts facilitates a dynamic and flexible approach to mitigation that has been accommodated via **ES Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**.<br><br>There is no policy requirement within NPS EN-3 that trial trench evaluation must be carried out to support and application. NPS EN-3 paragraph 2.10.113 states: *'Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation.'* (see also para 5.9.11 of NPS EN-1). Paragraph 2.10.114 goes on to reinforce this by stating '*In some instances, field studies may include investigative work…'.* Further, at 2.10.115 of EN-3 it states: '*The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area '(*see also para 5.9.10 of NPS EN-1). The Applicant's approach to archaeological investigations has been informed by and evolved according to the nature of the Proposed Development and our understanding of the archaeological potential, e.g. with areas of greatest archaeological potential being excluded from the Proposed Development, and where development is fixed and will have the greatest impact, pre-determination trial trenching has been undertaken. |

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| | | | As noted above, the Applicant's approach is also in-line with draft guidance relating to Archaeology and Solar development, which has been prepared by the Chartered Institute for Archaeologists (Archaeology and Solar Farm: Good Practice Guide – Consultation Draft, August 2025). Within Principle 8 of this guidance (targeted and Sustainable Trial Trenching: Enhancing Confidence While Considering Development Impact), it is stated at paragraph 3.8.2 that *"Where trial trenches are needed, timing should be carefully considered, with post-determination assessment preferred where possible…"* At paragraph 3.8.3 it is noted that *"Additionally, when considering the use of trial trenches on solar farms, it is important to bear in mind the relatively low impact of large areas of the scheme (i.e., panel supports) and the high level of flexibility in the design of solar farms. Trial trenching can involve more ground disturbance than the construction of panel supports…"* At paragraph 3.8.4, it is also noted that *"The archaeological sector should also be mindful of the environmental sustainability of trial trenching. There are carbon emissions associated with the use of plant, often powered by diesel fuel, and there is the release of soil carbon through soil disturbance (in particular on permanent pasture and areas of peatland) …"* |
| RR-052/15 | Landscape and Visual | NCC has appointed specialist consultants to review the relevant landscape and visual elements of the application. The comments below are a summary of the findings thus far, but a full review of the landscape and visual elements of the scheme is currently being carried out and this will be provided through the LIR which | The Applicant notes that the comments are only a summary and that further detail will be provided via the LIR.<br>With regard to effects on landscape character, the LVIA does identify some localised significant effects as identified by NCC, but it is considered that the extent of these would be limited in |

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| | | will be submitted in due course. This will comprise a full review of the submitted Landscape and Visual Impact Assessment (LVIA) chapter of the ES to Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs), 10th January 2020, by the Landscape Institute (LI).<br><br>By reason of its mass and scale, the proposed development would lead to significant adverse effects upon the existing landscape and visual baseline, which is reflected within the applicant's LVIA.<br><br>The development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has potential to affect wider landscape character by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character, that are defining characteristics of the area. We are particularly concerned about the landscape character effects through changes to the land use over an extensive area of land. Significant landscape effects are subsequently identified within the LVIA chapter with the identification that the Steeples Renewables Project would "cause notable effects upon the Landscape Character of the Site, due to the extent and size of the Proposed Development". | the context of the scale of the Proposed Development and that an appropriate scheme of mitigation has been provided to further reduce effects over time.<br><br>**ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** includes a Landscape and Visual Impact Assessment (LVIA).<br><br>This identified a range of localised significant effects on landscape character and visual amenity. These effects have been reduced through the design process and would be further reduced as the mitigation planting (detailed in section 3 and 9 of the **Outline Landscape Ecological Management Plan (oLEMP) [APP-116]** and secured by Requirement 6 (LEMP) of the **dDCO [APP-041]**) included with the Proposed Development begins to mature. |

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| RR-052/16 | Landscape and Visual | However, in regard to landscape features, the LVIA does not identify any significant adverse effects through the development of a large scale solar farm in a rural location, with the LVIA stating that "once construction is completed there would be no further adverse effects on the landscape features of the Site". The LVIA goes on to identify Minor Beneficial effects at year 1 and Moderate Beneficial effects at Year 15 (once mitigation planting has established) on baseline features of: Woodland and Individual Trees; Hedgerows; and Ground cover.<br><br>These judgements will be interrogated within the detail LVIA review; however, we would query how any beneficial effects would be evident through the development of a large-scale solar farm in a rural location, and this does not align with the findings of several other similar LVIAs associated with schemes in both the Nottinghamshire or Lincolnshire regions. While we acknowledge that establishment of new areas of planting will introduce positive elements to the landscape and strengthen aspects of landscape character, this is to mitigate the adverse effects of the development. | It is not correct that the **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** does not identify any significant adverse effects on landscape features. A significant adverse effect is identified during the construction phase on both hedgerows and also the ground cover of the Site. During the construction phase. During the operation phase, it is however the case that no significant adverse effects were identified on landscape features. This is because in relation to the hedgerows, there would be notable additional hedgerow planting that would far exceed the lengths removed during the construction period. Similarly in relation to the ground cover, during the operational period this would comprise of grassland, including new species rich grassland across the Site, to help maximise its biodiversity potential. When compared with the existing arable or pastoral farmland at the Site, it is not considered that this change to grassland ground cover would represent a significant adverse effect. |
| RR-052/17 | Landscape and visual | We would also query the landscape features selected by the author as baseline receptors as they appear to favour those elements that will remain unaffected or form part of the mitigation strategy, ignoring the open arable fields that we judge a key landscape feature in this agricultural landscape.<br>The arable fields will be directly and extensively affected through a complete change in land-use. | **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** provides an LVIA undertaken in accordance with the third edition of the Guidelines for Landscape and Visual Assessment (GLVIA3). It provides an assessment of landscape features considered 'vegetation and ground cover', 'topography' and 'drainage and water features'. The 'vegetation and ground cover' category considered woodland, individual trees, |

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| | | We have assumed there may be an error in terminology, as the GLVIA3 Glossary does not identify 'ground cover' (as utilised in the LVIA), but does define Land cover, which is identified as: "The surface cover of the land, usually expressed in terms of vegetation cover or lack of it. Related to but not the same as land use". GLVIA3 does define Land use as: "What land is used for, based on broad categories of functional land cover, such as urban and industrial use and the different types of agriculture and forestry". The changes to land use are one of our main concerns in regard to landscape effects. | hedgerows and ground cover. Ground cover can be used interchangeably with land cover and the matters identified by NCC under their definition of land cover were the matters that were covered in the LVIA in the consideration of ground cover.<br><br>The land cover of the fields which make up the Site has therefore been considered in the LVIA. As set out above, a significant adverse effect is identified during the construction phase on the ground cover of the Site, but during the operational period this would comprise of grassland, including new species rich grassland across the Site, to help maximise its biodiversity potential. When compared with the existing arable or pastoral farmland at the Site, it is not considered that this change to grassland ground cover would represent a significant adverse effect. |
| RR-052/18 | Landscape and visual | We would also challenge the assessment that at Year 1 the planting would make any discernible improvement to landscape features to be judged as having beneficial effects. This would be immature planting and contribute little to the current character or features, and we would not anticipate any beneficial effects from this. The examination process provides the opportunity to review and interrogate these judgements, as while the new planting and habitat creation will add valuable assets across this area, this is through the introduction of a large-scale solar development in an agricultural landscape. | It is not agreed that there would be no benefit from the proposed mitigation planting at Year 1. Even whilst immature, planting would begin to provide a benefit as both a landscape feature and in terms of biodiversity **(ES Chapter 7: Ecology and Biodiversity [APP-065]).** It is however acknowledged that the benefits of the planting would be greater by Year 15 and this is reflected in the assessment judgements set out in the Landscape and Visual Impact Assessment (LVIA) **(ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]),** with the beneficial effects on landscape features at Year 1 generally being identified as minor and not significant. |

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| RR-052/19 | Landscape and visual | The scale and extent of development would also lead to significant adverse effects on views from visual receptors, changing from views experienced within an agricultural or rural landscape to that of a landscape containing large scale solar development. The development has been identified in the LVIA as resulting in a significant change to a variety of visual receptors during construction and<br>in the early years of operation, with significant residual visual effects much reduced in number. | **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** has identified some significant effects on visual receptors. However, the extent and nature of the effects is generally very limited and localised. The effects would also be notably reduced by Year 15 when proposed planting has begun to mature. However, the effects have also been reduced through the design iteration process which resulted in notable offsets from residential properties and settlements, as well as avoidance of impacts to key landscape features. |
| RR-052/20 | Landscape and visual | Significant effects largely arise from sensitive users along PROW and residents where it is not possible to sufficiently screen views of the development. However, we do note that the reduction in Significant visual effects relies upon the successful establishment of the mitigation planting scheme.<br>We do not agree with several judgements of Moderate landscape or visual effects being deemed Not Significant. While we agree that professional judgement should guide the final assessment and the LVIA process should not be solely based on matrices or tables, we would expect that in the majority of cases, a Moderate effect would be deemed Significant, whereas in the LVIA the majority of Moderate effects are judged as not Significant. | **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** provides an LVIA. The methodology for the identification of significant effects was developed with regard to the overarching principles set out in Guidelines for Landscape and Visual Impact Assessment (3rd Edition) [GLVIA3].<br><br>GLVIA3 notes at paragraph 3.32 that *'There are no hard and fast rules about what effects should be deemed 'significant' but LVIAs should always distinguish clearly between what are considered to be the significant and non-significant effects'.* This is done in the LVIA, which clearly notes which effects are significant and which are not.<br><br>GLVIA3 goes on to discuss how the judgement of significance is set out and states at paragraph 3.33 that the final judgement of effects is *'often summarised in a series of categories of significance reflecting combinations of sensitivity and magnitude. These tend to vary from project to project but they should be appropriate to* |

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| | | | *the nature size and location of the proposed development'.* The approach taken in the LVIA to using a 5 point scale to identify the level of effects and then setting out which of those effects would be significant is in line with this guidance. This scale is referred to in paragraph 6.3.32 of **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064].** |
| RR-052/21 | Landscape and Visual impacts | Paragraph 6.3.46 of the LVIA identifies that "effects described as major, major/moderate and in some cases moderate may be regarded as significant effects", however this is not aligned with the overall judgement of Significance within the ES, as described in paragraph 2.10.8 as "Major' or 'Moderate' degree of significance it is deemed to be 'significant'". This approach provides inconsistency with the other chapters of the ES, and while there is scope for discipline specific deviation from the overall ES methodology, we are unsure as to why the LVIA is different as no justification has been provided, and this has the potential to underplay the number and extent of significant landscape and Visual effects. | Paragraph 2.10.7 of **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** discussed the indicative degrees of significance table and confirmed that *'The above magnitude and significance criteria are provided as a guide for specialists to categorise the significance of effects within the ES'* Other environmental topics in the EIA also had slightly differing approaches to the identification of significant effects, based on the best practice guidance applicable to those topics and the professional judgement of the Chapter authors. However, in all instances the methodology used was clear and the effects which were identified to be significant were clearly identified from those which were not significant. It is not unusual for the approach to identifying significant effects to vary between environmental topics within an ES, as indeed it may vary between one LVIA and another. |
| RR-052/22 | Landscape and Visual impacts | The cumulative landscape and visual effects of the proposed development are considered in Section 6.10 of the LVIA. No Significant cumulative effects have been identified within the LVIA. However, we do have concerns about cumulative effects across the region; Cumulatively, the mass and scale of several | The Applicant notes this comment. |

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| | | NSIP scale energy projects combined with the Steeples Renewables Project has the potential to lead to adverse effects on the landscape baseline over an extensive area across multiple published character areas. The landscape character of the Nottinghamshire region will be altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly of agricultural character and agricultural land use;<br><br>Subsequently, solar development is not identified within current published character assessments. While it is not suggested that agriculture will not remain as a defining characteristic, over a short period of time large scale solar will undoubtable become a widespread characteristic in the Nottinghamshire region, as well as Lincolnshire to the east (with some schemes spanning the county boundary). Subsequently, we judge that solar development would be a key characteristic in any updates to published character assessments from local to national scale. | |
| RR-052/23 | Landscape and Visual impacts | However, given the absence of a unified, county-wide landscape character baseline across Nottinghamshire, this presents a challenge when assessing cumulative effects over a strategic county-wide scale to consider all these energy projects. Therefore, an approach we are promoting is to extract common landscape attributes of the area from the multiple character area assessments that cover the region, enabling a reasoned, | The Applicant has provided an **oLEMP** into the examination under exam reference **[APP-116]** for availability to comment. Pursuant to Requirement 6 of the **dDCO [APP-041]**, no phase of the authorised development may commence until a LEMP covering that phase is submitted to and approved by the local planning authority in consultation with Natural England. |

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| | | evidence-led baseline, and subsequently assessment, of cumulative landscape effects across the wider county area. The Steeples Renewables Project would evidently deliver landscape and ecological assets through mitigation areas and planting. However, this will be dependent upon the information set out in the Outline Landscape and Ecology Management Plan and Figure 6.9 – Landscape and Ecological Mitigation Strategy drawings which illustrate the mitigation, which should be further explored, and assume would be refined at the detailed design stages.<br><br>The DCO should include for approval of any subsequent detailed landscape and ecological mitigation scheme (planting works), as referenced in DCO Schedule 2, Requirement 3, Requirement 3 and Requirement 6. This should clearly link to any landscape mitigation scheme that is submitted as part of the DCO, and subsequently that which has been assessed as part of the LVIA. The DCO and LEMP should also include for an appropriate period of landscape maintenance, that ties into a period of time identified in the Outline Landscape and Ecology Management Plan, and would expect an initial 15 year period of management and maintenance as a minimum, which would align with the assessed residual landscape and visual effects, and then this would subsequently be regularly reviewed and monitored at a reasonable period, such as every 3 to 5 years and implemented for the lifetime of the project. This should also consider plant replacements beyond the initial 5-year period and account for | The LEMP must accord with the oLEMP. Therefore, details in the oLEMP currently in examination will be carried through into the LEMP in accordance with Requirement 6.<br><br>All landscaping works must be carried out in accordance with the LEMP as per Requirement 4. Requirement 4 requires a replacement period for damaged or dead planting of 5 years. This is set out in Requirement 4. |

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| | | extensive areas of die-back or plant failures for the lifetime of the project. This is to ensure the mitigation planting is fulfilling its role beyond an initial "standard" 5-year period. | |
| RR-052/24 | Minerals and Waste | The County Council are of the opinion that the applicant should have undertaken a Minerals Resource Assessment, with this the standard practice for similar DCO applications in the area which have been, partly or fully, in a mineral safeguarding area. The County Council does not consider the paragraphs included within the Planning Statement are sufficient to assess the potential impacts on minerals, particularly as the proposed DCO site is nearby to a permitted and allocated quarry which has not been referenced. A Minerals Resource Assessment should have been undertaken which fully assesses and demonstrates that the effects of the application on the mineral resource and quarry site have been considered, with any impacts identified mitigated if necessary. | No part of the Order Limits fall within either an allocation or area of search for mineral extraction from the Local Plan.<br>However, section 6.11 of the **Planning Statement [APP-182]** has considered the proposals impact to mineral safeguarding.<br>In terms of Mineral Safeguarding Areas ('MSA'), the Proposed Development affects a relatively small area of a very large sand and gravel deposits, with the majority of the Order Limits falling outside a MSA. The MSA covers a large part of the local planning authorities administrative boundary. It is therefore very unlikely that these small areas would be required for mineral extraction during the temporary operational life of the Proposed Development, such that paragraph 5.11.28 of NPS EN-1 is not engaged.<br><br>The Proposed Development is unlikely to sterilise any significant volumes of safeguarded mineral due to the limited amount of ground disturbance at depth.<br><br>At the end of its operational life, the Proposed Development will be decommissioned, ground structures removed and the site restored. Deep foundations or excavations are not required by the Proposed Development. Therefore disturbance is limited to surface layers rather than underlying deposits, thus underlying |

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| | | | mineral deposits would not be permanently sterilised and available to exploit if required at a future date.<br><br>Due to the temporary nature of development and limited ground disturbance, a Mineral Resource Assessment is not required in this instance. The Applicant is aware of no policy requirement which would require such an assessment.<br><br>The proposed development does not encircle the quarry and will work with its operator sharing the same access track. Should the need arise, the quarry could still extend in other directions (subject to planning permission) and, in the future, extract mineral within the order limits (subject to necessary planning permission) at the end of the Proposed Developments operational life bearing in mind its temporary nature and limited ground disturbance. |
| RR-052/25 | Waste Management | The County Council believes that the assessment of the impacts on waste should consider the absolute worst- case scenario that waste, in particular PV Solar Panel waste at the decommissioning phase, may need to be landfilled. This is in line with what other similar DCO proposals have undertaken so that the impact of the proposal, and cumulatively with others, on limited landfill capacity has been considered. | Waste is considered on a reasonable worse case basis and addressed in **ES Chapter 17 Miscellaneous Issues [APP-074]**. Potential waste generation at each stage of development (construction, operation (and maintenance) and decommissioning) has been considered along with how waste will be disposed of.<br>During construction, operation, and decommissioning, the re-use or recycling of materials will be explored before resorting to landfill options. The Applicant's approach to waste during the construction, operation and decommissioning phase is set out in the **ES Appendix 4.1 Outline Construction and Environmental** |

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| | | | **Management Plan oCEMP) [APP-089] ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090] and ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [APP-092]** with final versions of those documents secured by Requirements 7 (CEMP) Requirement 9 (OEMP) and Requirement 21 (Decommissioning and Restoration) of the **dDCO [APP-041].** There would be no significant residual effects on waste from the Proposed Development.<br><br>The Applicant has followed the waste hierarchy and will ensure as much waste as possible is recycled with landfill the last resort and worst case. The quantum of waste that could not be recycled or reused is limited.<br><br>Paragraphs 17.5.22 to 17.5.38 of **ES Chapter 17 Miscellaneous Issues [APP-074]** confirm PV Solar Panels will mainly be a waste source at decommissioning stage. They will be recycled or reused, where possible. With regards to the supporting structures, the structures will be unscrewed/unbolted and then removed from the ground using a piling machine. Once the supporting structures have been removed, they will either be re-used or recycled, where possible. Only a small amount of backfilling will be required to fill the holes of the supporting structures.<br><br>At this stage it is not possible to forecast need for landfill disposal of waste nor the capacity of the landfill sites during the |

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| | | | decommissioning at this stage due to potential change in waste generation and operators at that time (around 40 years in the future). Currently 95% of the materials used to make PV solar panels can be recovered and recycled. |
| RR-052/26 | Public Health | The summary of the Health Impact Assessment (HIA) for the Steeple Renewables Project as part of the application for DCO. This comprehensive assessment has meticulously evaluated the potential effects of the proposed development on the health and wellbeing of the local population, adhering to national guidance and best practices to ensure that health considerations are seamlessly integrated into the planning and decision-making process.<br><br>The assessment covers a wide scope, focusing particularly on vulnerable groups such as children, older adults, and those with existing health conditions. It assesses various health determinants including air quality, noise, access to services, physical activity opportunities, and social cohesion. The geographical coverage of the assessment considers both the immediate vicinity and the broader community that could be affected by the development.<br>In terms of findings, the HIA highlights several positive impacts such as potential improvements in infrastructure, increased access to green spaces, and the creation of employment opportunities. | The Applicant notes this comment. |
| RR-05227 | Construction | However, it also identifies some negative impacts, notably risks related to construction-phase pollution, increased traffic, and | The Applicant can confirm mitigation strategies identified in the **Health Impact Assessment [APP-183]** have been reflected in **ES** |

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| | | additional pressure on local health services. To address these concerns, the HIA outlines mitigation strategies including the implementation of noise barriers, traffic management plans, and community engagement initiatives.<br><br>The recommendations provided emphasise the importance of early and ongoing consultation with public health teams to include UK Health Security Agency (UKSHA), the integration of health promoting features in the design (like walkable routes and green buffers), and the monitoring and evaluation of health outcomes post-development. | **Appendix 4.1 Outline Construction and Environmental Management Plan oCEMP) [APP-089], ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090], ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [APP-092] and ES Appendix 13.2 Outline Construction Traffic Management Plan (oCTMP) [APP-129]** with further details secured by Requirements 7 (CEMP) Requirement 9 (OEMP) and Requirement 21 (Decommissioning and Restoration) of the **dDCO [APP-041].** |
| RR-052/28 | Traffic and Transport | In terms of highways and traffic impacts, the County Council has noted the highways related supporting information in respect of Steeples Renewables and at present is taking a neutral view in response to the approach/methodology contained in the applicants initial Transport & Access element of the Environmental Statement. The County Council will continue to review further formation and liaise with highway support colleagues and provide a more comprehensive response as part of its Local Impact Report.<br>We advise that the promoters and project consultant team have established contact with NCC<br>Highways and we frequently meet to agree and develop the detail of the construction routing and Outline CTMP. This will be used to manage the anticipated traffic and transportation impacts of the project. We have no concerns at this time in respect of this work. | The Applicant notes this comment and can confirm discussions are ongoing. |

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| RR-052/29 | Public Rights of Way | NCC notes that part of the PROW network within the vicinity of the order limits is proposed to be shared and/or crossed by haul routes. | Noted and acknowledged.<br><br>Further details of the PROW management strategy are provided in the **OCTMP [APP-129]** and Requirement 8 (CTMP) and Requirement 13 (Public Right of Way Management Plan) of the **dDCO [APP-041]** secures that final versions of these plans are approved prior to commencement of the authorised development. |

## Table 2-2: Newark and Sherwood District Council

| ID | Theme | Verbatim Comment | Response |
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| RR-030/1 | | I refer to the above and the notification received inviting Newark and Sherwood District Council (NSDC) to register to participate in the examination of the above project, including the provision of any 'Relevant Representations.'<br><br>The Steeples Renewable project does not lie within the district of NSDC and as such, we are a neighbouring local authority.<br>We note that the southern extent of the project is approximately 7 miles away from the northern edge of the NSDC district and as such, we do not anticipate direct impacts are as likely in this respect. | The Applicant notes this comment. |
| RR-030/2 | Cumulative impacts / Environmental impact | Notwithstanding this, NSDC have a number of other major projects, including NSIP projects at different stages of progression, as can be seen from Table 1 presented below, all within our district.<br><br>As such, one of the key concerns of the authority is the potential for significant adverse environmental effects, resulting from cumulative effects associated with NSIP and other major infrastructure projects. Given the scale and extent of NSIP projects, we are also monitoring neighbouring authority area NSIP/major projects, so that the potential for cumulative effects can be considered. | The assessment chapters set out in the **Environmental Statement [APP-058 to APP-074]** included a cumulative impact assessment which was prepared in line with the guidance within 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment'.<br><br>Cumulative and in combination effects of the development have been summarised in **ES Chapter 18: Summary [APP-075]**.<br>The assessment of cumulative effects has considered the potential for effects from other developments in the area to combine with and intensify effects caused by the Proposed Development. Significant cumulative residual effects are identified for ecology and biodiversity, socio-economics and climate change. In regard to ecology and biodiversity, a local to |

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| | | | district level significant adverse cumulative effects anticipated for breeding skylark birds.<br><br>There would be significant beneficial effects on employment and economic contribution as a result of the combined effect of the Proposed Development with other developments during the construction, operation and decommissioning phases. During the construction phase a significant adverse cumulative effect is identified for accommodation demand. This presents a worst-case scenario should the other developments' construction timeframes overlap, however, in reality this is unlikely and the significance level identified would be reduced. When considering cumulative effects with other renewable generation projects with the Proposed Development during the operational phase, there would be a beneficial cumulative effect on climate change through the contribution to the UK's legally binding emission reduction targets.<br><br>In-combination effects have been considered during the construction, operation, and decommissioning phases of the Proposed Development. In light of the comprehensive range of embedded design measures, effect interactions have only been presented in Table 18.5 of **ES Chapter 18: Summary [APP-075]** where residual adverse or beneficial effects of at least minor in at least one receptor group have been identified. |

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| | | | Table 18.5 and Table 18.6 of **ES Chapter 18: Summary [APP-075]** provide a qualitative assessment of the in-combination effect interactions on these receptor groups. Construction and decommissioning have been presented together because the types of effect interactions would be broadly the same with decommissioning effects likely to be less significant than the construction phase. No significant adverse in-combination effects have been identified. |
| RR-030/3 | Cumulative impacts / Environmental impact | In this regard, we would ask that the ExA give specific and robust consideration to the issue of cumulative environmental impacts, given the scale and extent in particular of NSIP projects within the Nottinghamshire and Lincolnshire areas.<br><br>We will continue to monitor the examination of this project and make further representations, as we consider to be necessary. | The Applicant notes this comment and refers to the Applicants response to comment 2. |
| RR-030/4 | Cumulative Impacts | Project Name Type Stage<br>• A46 Newark<br>• A46 Newark Bypass - Project information<br>NSIP Post Examination Stage<br>• Great North Road Solar Park<br>• Great North Road Solar and Biodiversity<br>• Park - Project information<br>• NSIP Pre-Application stage<br>• One Earth Solar Farm<br>• One Earth Solar Farm - Project information<br>NSIP Pre-examination* | The Applicant notes this comment and refers to the Applicants response to comment 2. |

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| | | • Staythorpe Carbon Capture Scheme<br>• Staythorpe Power Station, EIA scoping opinion: variation to section 36 consent,<br>• Electricity Act 1989 - GOV.UK Electricity Act Pre-application<br>• North Humber to High Marham<br>• North Humber to High Marnham - Project information NSIP Pre-application | |
| RR-030/5 | | Please note that this matter has not been formally reported to the District Council's Planning Committee. In these circumstances the comments are those of an Officer of the Council under delegated power arrangements. I trust these comments are of assistance to the Planning Inspectorate and should you wish to discuss further, please contact the undersigned. | The Applicant notes this comment and refers to the Applicant's response to comment 2. |

## 2.2. Parish councils

2.1.1. The tables below set out to the Applicant's response to Relevant Representation submitted by parish councils.

### Table 2-3: North and South Wheatley Parish Council

| ID | Theme | Verbatim Comment | Response |
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| RR-018/1 | Size and Scale | Scale and Impact on Surrounding Communities<br>The huge scale of 1,700 acres (equivalent to more than 1,300 football pitches) will completely surround Sturton le Steeple, negatively affecting neighbouring villages, including South and North Wheatley, Bole, and West Burton. North Leverton West Burton and North Leverton with Habblesthorpe Parish Council has also submitted an objection to the scheme. • This would be one of the largest solar projects in the UK, dominating the landscape and drastically altering the rural character of the area. • Reference: The Little Crow Solar Park (Lincolnshire), proposed at 900 acres, received significant public objection due to visual dominance and rural disruption. (North Lincolnshire Council Planning Portal) | The **Environmental Statement [APP-058 to APP-074]** has considered the potential for impacts to nearby communities in terms of matters including visual effects, noise and air quality. The Proposed Development has been designed to minimise effects on nearby properties and settlements, with further mitigation planting included that would further reduce effects as it matures. |
| RR-018/2 | Agricultural Land | Loss of Agricultural Land and Food Security<br>The land targeted is Grade 2 and 3a agricultural land, among the most versatile for food production. • DEFRA (2021) reported that over 2.6 million hectares of UK farmland have been lost since 1945. • Solar farms, once installed, often render land unsuitable for arable farming for decades. "Dual use" (e.g., sheep grazing) has limited crop viability. Once productive farmland is converted to solar use, it is typically reclassified as industrial land. Although often described as 'leased,' the typical term is 30–40 years. During this period, soil quality can degrade significantly | **ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** and the **Design and Access Statement [APP-184]** detail the process the Applicant has followed for site election and design review, including the consideration given to the use of brownfield land.<br><br>As set out therein, there are no preferable sites that are of sufficient scale to enable the construction of the Proposed |

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| | | due to inactivity, and the posts that support solar panels are often fixed in concrete footings. These changes mean the land is unlikely to return to viable food production afterward.<br><br>Reference: https://www.gov.uk/government/statistics/agricultural- land-use/ • Reference: CPRE (2022) warns that solar farms on productive land risk UK food security. | Development on non-agricultural land, or land that is of a lower ALC grade without constraint.<br><br>Approximately 72.1% of the land within the Order Limits forms BMV land. However, the Proposed Development will only result in temporary disturbance of approximately 12.1 ha of BMV agricultural land. This land will not be lost, in that it is all capable of restoration to a comparable grade at the decommissioning phase. The works require the removal of topsoil, its storage in suitable conditions, and its replacement following the removal of the fixed equipment. None of the fixed equipment requires deep foundations, and mostly only topsoil requires to be stripped off and stored. We have followed guidance in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra (2009). The reinstatement to comparable soil properties and land grade would be undertaken in accordance with a Soil Management Plan secured by Requirement 11 of the dDCO, with regard to the measures stated within **ES Appendix 15.2- Outline Soil Management Plan [APP-132]**.<br><br>The Applicant has sought to minimise impacts on BMV land through the design of the Proposed Development (as previously mentioned) and ALC ratings as well as agricultural land productivity. This includes through discussions with landowners and minimising the impact of |

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| | | | the Proposed Development on the landowners' wider land holdings.<br><br>Effectively the Proposed Development minimises impacts on agricultural land, retaining the ability to reinstate arable agricultural land after decommissioning as well as allowing soils to rest.<br><br>Panel areas will still support grazing through biodiversity management and therefore continue to contribute as an agricultural resource. However, it is noted that food security and food production isn't a relevant consideration under the NPS.<br><br>In accordance with paragraph 5.11.12 of NPS EN-1 the Applicant has demonstrated that the Proposed Development minimises impacts upon BMV land in accordance with paragraph 5.11.34 of NPS EN-1 the development is justified on BMV agricultural land due to the fact there are insufficient areas of available non-BMV land without constraints on which to accommodate the whole Proposed Development. Furthermore, in accordance with Paragraph 5.11.12 of NPS EN-1 the Proposed Development will minimise impacts on the best and most versatile agricultural land by not lead to any permanent loss of BMV land within the Site. |

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| RR-018/3 | Ecology and Biodiversity | Environmental and Wildlife Impact<br>The development will fragment existing wildlife corridors and displace native species already under pressure. • Natural England Research Report NERR108 shows ground- mounted solar farms disrupt habitats for birds and pollinators. • Reference: BRE National Solar Centre Biodiversity Guidance for Solar Developments (2014) | Environmental and wildlife impact have been considered throughout **ES Chapter 7: Ecology and Biodiversity [APP-065]**.<br><br>The potential for fragmentation has been addressed through retention of existing wildlife corridors, creation and enhancement of corridors, and incorporation of features such as mammal gaps in fence lines. The impact assessment concluded that an adverse displacement effect could occur for skylark as a result of solar panels being installed in fields. To address this, a skylark mitigation strategy has been prepared (**ES Appendix 7.13 Skylark Mitigation Strategy [APP-115]**). This includes proposals to increase the carrying capacity of the biodiversity mitigation areas by managing the arable fields in a way that creates an estimated 58 skylark breeding territories. In addition, other larger areas of grassland habitats in other parts of the Site will provide further potential for skylark territories to develop. This approach aligns with the need to consider the 'mitigation hierarchy' as set in paragraph 4.6.1 of NPS EN-1 by minimising impacts where they cannot be avoided.<br><br>Natural England Research Report NERR108 is titled 'Living England: Satellite-based habitat classification- Technical User Guide' provides guidance for applying machine learning techniques to interpret aerial images into habitat probability maps. This research report does not appear to |

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| | | | include reference to solar farms and therefore no further comment is made on the report.<br><br>The approach to biodiversity enhancement is consistent with the principles of the document BRE National Solar Centre Biodiversity Guidance for Solar Developments (2014) which provides broad guidance for increasing biodiversity at solar farms. For example, BRE recommends that hedgerows should remain intact with protection zones where possible, and this has been implemented – with the **ES Appendix 7.12 Biodiversity Net Gain [APP114]** showing that 98.5% of the ca. 70 km of existing hedgerows will be retained, and Table 3.3 of **the ES Appendix 4.1 Outline Construction Environmental Management Plan [APP-089]** confirming that protective fencing will be installed around trees and hedgerows. The Proposed Development also includes creation of woodland, habitat for invertebrates, hedgerow planting, and field margin creation; as well as adopting good practice measures during construction, post-construction management for biodiversity, and monitoring. |
| RR-018/4 | Water and Flood Risk | Flooding and Water Management Concerns<br>The area is prone to flooding. Solar panel installations and access tracks reduce soil infiltration and increase runoff. • University of Lancaster (2021) found that large solar farms can increase surface water runoff and reduce groundwater recharge. Environment Agency guidelines require developers to mitigate flood risk, yet plans here remain unclear. | The Applicant acknowledges that the site falls within the fluvial Flood Zones (albeit provided significant protection by the River Trent flood defences) and that there is a known surface water flooding issue in Sturton le Steeple resulting from runoff from the fields above the village. |

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| | | Villages including Sturton le Steeple, South Wheatley, North Wheatley, and North Leverton have all suffered repeated flooding in recent years. Homes and schools have been flooded multiple times. | Runoff from the Proposed Development will be managed through the use of Sustainable Drainage Systems, whereby runoff will be intercepted by strategically positioned swales and contained within attenuation basins prior to a controlled discharge to local watercourses at greenfield rates. The **Surface Water Drainage Strategy [APP-120]** has been designed to cater for the 1 in 100 year plus climate change event and has been developed in consultation with Nottinghamshire County Council as the Lead Local Flood Authority and the Trent Valley Internal Drainage Board. It demonstrates that there will be no increase in runoff or reduced infiltration as a result of the Proposed Development.<br><br>The **Surface Water Drainage Strategy [APP-120]** is in accordance with paragraph 2.10.84 of NPS EN-3 that states "As solar PV panels will drain to the existing ground, the impact will not, in general, be significant".<br><br>In addition to ensuring there is no increase in runoff from the Proposed Development, the Applicant has committed to providing additional measures which aim to provide a positive reduction in the existing flood risk to Sturton le Steeple. This will be achieved by providing two large detention basins west of Sturton-le-Steeple village as shown on sheet two **Site Layout Plan [APP-011]** positioned strategically to intercept existing flow paths and |

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| | | | store runoff from the fields that currently flows uncontrolled towards the village resulting in flooding on the roads in the centre of the village. This is an additional voluntary measure for the benefit of the local community and is separate to the measures proposed to control runoff from the Proposed Development.<br><br>Full details of flood risk mitigation are contained within the submitted **Flood Risk Assessment [APP-178]** and **Surface Water Drainage Strategy [APP-120].** These documents confirm that the Proposed Development will not result in an increase in flood risk and will contribute to a reduction in the existing flooding issues in the local community. |
| RR-018/5 | Landscape and Visual | Footpaths, Public Access, and Landscape Character<br>Local Rights of Way may be diverted, obscured, or surrounded by fencing and surveillance, impacting countryside enjoyment. • Reference: The Ramblers Association notes solar sites often reduce access quality and visibility for walkers. | The **ES Chapter 6 [APP-064]** includes a Landscape and Visual Impact Assessment that has identified some localised significant effects on landscape character and visual amenity. No public rights of way would be diverted during the operation of the development however, nor would there be any surveillance of the routes, with security cameras covering the Proposed Development, not external to it. |
| RR-018/6 | Cumulative Impacts | The area has already hosted: o West Burton A & B power stations o National Grid pylons o A future UKAEA nuclear fusion facility<br>This represents a disproportionate industrial energy burden. • Reference: The National Infrastructure Commission acknowledges rural overexposure to energy developments. | NPS EN-1, NPS EN-3 and NPS EN-5 as well as other national energy policy set out the UK Government's aim for a secure, long term, reliable, resilient, affordable and low-cost energy supply generated in the UK whilst, at the same time, decarbonising the energy system. |

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| | | | The principal need for the Proposed Development is centred on the significant contribution it will make to the three important national energy policy (NPS EN-1, NPS EN-3 and NPS EN-5) aims of Decarbonisation, Security of Supply and Affordability. This need is also in the context that the above objectives will need to be delivered during a period where there will be an increasing level of demand for electricity.<br><br>National planning policy supports the principle and there is a significant need for the Proposed Development.<br>The **Environmental Statement [APP-058 to APP-074**] included a consideration of the potential for cumulative effects with other existing and proposed developments in the surrounding area. This includes the developments referred to in the comment. |
| RR-018/7 | Policy | No national or local clarity on: o Why 1,700 acres is needed for 400MW o Why no brownfield or lower-grade land alternatives are proposed o How other counties are sharing the burden<br>• Reference: UK Government Solar Strategy (2023) prioritises brownfield use. (gov.uk/solar-energy-strategy)<br>• Reference: Solar Energy UK (2023) found planning inconsistency between counties. | The Applicant notes the comment and refers to the response previously provided to comment 2 (Agricultural Land). |
| RR-018/8 | Socioeconomics | Solar farms create only 2–5 jobs per 100MW, with minimal benefit to locals once built.<br>In contrast, farmland supports multiple jobs: farm owners, contractors, seasonal workers. This impact also extends to businesses in agricultural | **ES Chapter 10: Socio-Economics [APP-068]** has assessed the proposal socio-economic impacts. In terms of employment, paragraph 10.7.1-10.7.5 set out the Proposed Development could support 382 temporary jobs, both |

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| | | supplies, engineering, and training — all of which depend on a thriving farming sector in the region.<br>• Reference: Solar Trade Association (2020) • Reference: Oxford Brookes University (2021) found house prices near large solar sites drop by 10–12%. | direct jobs on-site and indirect/induced roles in the wider economy, during the 24-month construction phase.<br>During the operational phase, paragraph 10.7.23 of **ES Chapter 10: Socio-Economics [APP-068]** confirms there will be frequent visits made by off-site workers whose remit includes this Site to ensure the Proposed Development is maintained appropriately and remains operational. At decommissioning stage paragraphs 10.7.34 to 10.7.36 of **ES Chapter 10: Socio-Economics [APP-068]** confirms the Proposed Development could support 191 temporary jobs, both direct jobs on-site and indirect/induced roles in the wider economy, during the 12-month decommissioning period.<br>The Applicant is committed to the enhancement of employment generated by the Proposed Development. As such, opportunities for employment and skills are supported through the preparation of an **Outline Supply Chain, Employment and Skills Plan (OSCESP) [APP-127]**. The delivery of a final SCESP is secured requirement 22 of the **dDCO [APP-041]**.<br>The use of an OSCESP is intended to enhance the beneficial employment effects during the construction and decommissioning phases to result in a major beneficial residual effect. It is acknowledged that the major beneficial residual effect relates to development phases that are temporal in nature, however, the legacy effect of upskilling |

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| | | | the local workforce where possible will result in a long-term significant benefit.<br><br>The Applicant notes the comment regarding farmland. The **ES Chapter 15 – Land Use and Agriculture [APP-072]** addresses matters related to agricultural viability. |
| RR-018/9 | Health | Mental Health and Community Wellbeing<br>Residents are already voicing distress about the potential impact on their environment and way of life.<br>Visual disruption, increased flood fear, and community tension can all negatively affect wellbeing. There is also concern around potential physical health risks. There is insufficient research into the long-term health effects of living adjacent to large solar arrays, and this uncertainty contributes to local fear and stress. A group who successfully opposed a large solar farm near the Peak District raised that there is insufficient research into the long-term health effects of living adjacent to large solar arrays, and this uncertainty contributes to local fear and stress.<br>• Reference: Centre for Sustainable Energy (2020) found poor consultation reduces public trust and mental wellbeing.<br>• Reference: Devon Communities Together (2022) found similar patterns in rural communities affected by energy projects | The Applicant notes this comment. The **Health Impact Assessment [APP-183]** submitted with the application addresses how the Proposed Development may affect wellbeing. The HIA notes that as far as possible, avoidance and minimisation of landscape and visual effects is managed through embedded design in terms of layout.<br>In terms of flooding, Requirement 9 in the **dDCO [APP-041]** secures an Operational Environmental Management Plan which must be in accordance with the outline OEMP. An **Outline Operational Environmental Management Plan (oOEMP) [APP-092]** has been submitted into the examination and sets out that the final OEMP will outline the methods and monitoring requirements to prevent adverse effects on flood risk and drainage during the operational phase. |
| RR-018/10 | General | This proposal will irreversibly change the physical, economic, and emotional landscape of our villages. While we support renewable energy, this project lacks fairness, balance, and planning integrity. We urge planners to:<br>• Explore smaller, less intrusive alternatives<br>• Use brownfield land first | **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** considers the landscape and visual impacts of the Proposed Development with reference to relevant landscape character assessments and significant effects. A range of factors have been considered |

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| | | • Fairly distribute solar infrastructure across the UK<br>• Protect productive farmland for national food resilience | including visibility, views, visual amenity, light pollution, local amenity, tranquillity and nature conservation.<br>With proposed mitigation, the ES demonstrates that a temporary residual significant adverse effect in EIA terms will, however, be created upon landscape and visual impact, residential amenity, ecology and biodiversity, and cultural heritage. However, all of these effects are limited to the lifetime of the Proposed Development, and it is not considered that those impacts are so great as to outweigh the benefits of the Proposed Development.<br>Distribution of solar developments across the UK is influenced by a combination of factors including planning policy (which steers development away from sensitive constraints such as ecological designations, landscape designations and heritage assets) as well as site specific factors such as land availability, slope and proximity to existing infrastructure. Economic factors, notable ability to connect to the national electricity grid also play a crucial role.<br><br>**ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** and the **Design and Access Statement [APP-184]** detail the process the Applicant has followed for site election and design review, including the consideration given to the use of brownfield land. |

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| | | | As set out therein, there are no preferable sites that are of sufficient scale to enable the construction of the Proposed Development on non-agricultural land, or land that is of a lower ALC grade without constraint.<br><br>In terms of fairness, balance and planning integrity, localised economic (including through the creation of jobs and use of accommodation stock), social (including creation of two permissive paths for the operational life of the Proposed Development and creation of two surface water detention basins reducing flood risk to the village of Sturton-le-Steeple by intercepting and storing overland flow) and environmental benefits (including in surface water drainage, flood attenuation, natural wetland habitat, 10 % biodiversity net gain and water quality management) will also be delivered by the Proposed Development. |

## Table 2-4: North Leverton with Habblesthorpe Parish Council

| ID | Theme | Verbatim Comment | Response |
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| RR-033/1 | General | We are writing to register and to object to the proposed Steeples Renewable Energy Project on the grounds that it materially conflicts with the adopted Sturton Ward Neighbourhood Plan (SWNP, 2022 Review).<br><br>Having reviewed both the Neighbourhood Plan and the Steeples project documentation, it is clear that the scale, location, and nature of this industrial style development are wholly incompatible with the vision and policies of the SWNP. | Appendix D of the **Planning Statement [APP-182]** contains a Local Policy Accordance Table. This table, on pages 73 to 101, confirms the Applicants' position that the Proposed Development complies with relevant policies or relevant parts of policies of the Sturton Ward Neighbourhood Plan.<br>Visions in the Sturton Ward Neighbourhood Plan are an overarching statement or series of statements describing what the community wants the area within Sturton Ward Neighbourhood Plan to look like at the end of the plan period. They are the desires of the local community. Unfortunately, they are not policies and therefore do not carry weight in decision making.<br><br>Section 104 of the Planning Act 2008 provides the basis for determining a Development Consent Order application if relevant NPSs apply.<br><br>Paragraphs 4.3.1 to 4.3.66, 5.1.1 to 5.1.38 and Appendix C (National Policy Accordance Table) of the **Planning Statement [APP-182]** confirm how the Proposed Development complies with National Policy Statements (NPS). This includes scale, location, and nature of development. |

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| | | | Finally, the Applicant draws attention to paragraph 4.1.15 of NPS EN-1 that states if there is a conflict with a local plan (Sturton Ward Neighbourhood Plan forms part of the local plan) and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure. |
| RR-033/2 | Landscape and Visual | Conflicts with Community Objectives • Countryside & Settlement Separation (Objectives 3c & 3d): The project industrialises open countryside and erodes the essential separation between villages. • Landscape & Heritage (Objectives 4 & 5): The rural landscape and historic setting will be irreversibly harmed. | **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** includes a landscape and visual impact assessment. This has considered a range of receptors in the North Leverton and Habblesthorpe Parish, including residential properties and Public Rights of Way. The LVIA also acknowledged relevant policies from the Sturton Ward Neighbourhood Plan. Neighbourhood Plan policies are also addressed on pages 73 to 101 of Appendix D (Local Policy Accordance Table) of the **Planning Statement [APP-182]**. |
| RR-033/3 | Ecology and Biodiversity / Landscape | Biodiversity & Amenity (Objectives 7 & 8): Hedgerow loss, reduced habitats, and restricted access to community footpaths directly contradict community aspirations. | 98.5% of the ca. 70 km of existing hedgerows will be retained and managed for biodiversity. 12.5% of the existing hedgerows will be enhanced to be more biodiverse (planting of additional trees), and a further 25.3 km of hedgerows will be created. Habitat biodiversity will be increased, as measured by the Statutory Biodiversity Metric (refer to **ES Appendix 7.12 Biodiversity Net Gain Report [APP-114]**); less biologically distinctive habitats (such as cropland) will be replaced with more biologically distinctive habitats (such as grassland, ponds, scrub, orchards). |
| RR-033/4 | Landscape and Visual /Local Policy | Contraventions of Adopted Policies • Policy 1 & 2a.1: The site lies outside settlement boundaries and undermines local housing/community priorities. • Policy 5.1 & 5.2f: The scale, | **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** includes a Landscape and Visual Impact Assessment (LVIA) that has considered a range of receptors in the |

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| | | design, and visual dominance fail to respect local character and important views. • Policy 6 & 7: The rural landscape and heritage environment are put at risk. • Policy 9, 10 & 12.2d: The development damages biodiversity, community access, and local amenity.<br>• Paragraphs 18.5 & 18.6: The Plan explicitly warns that large-scale industrial infrastructure materially harms the landscape — precisely what this project represents.<br><br>Summary In short, the proposal undermines the spatial vision of the SWNP, disregards its adopted Community Objectives, and breaches multiple core policies. It is an industrial-scale development in an entirely inappropriate location. | North Leverton and Habblesthorpe Parish. This includes residential properties and Public Rights of Way. The LVIA also acknowledged relevant policies from the Sturton Ward Neighbourhood Plan. Neighbourhood Plan policies are also addressed on pages 73 to 101 of Appendix D (Local Policy Accordance Table) of the **Planning Statement [APP-182].** |
| RR-033/5 | Landscape and Visual | Steeples Project Feature: Transformation of open countryside into industrial use Reference: Community Objective 3c Conflict / Concern: Industrialises countryside, reducing the sense of openness.<br>Steeples Project Feature: Vast site footprint between villages Reference: Community Objective 3d Conflict / Concern: Erodes separation between villages by extending development into open land.<br>Steeples Project Feature: Restricted footpaths and reduced amenity Reference: Community Objective 8 Conflict / Concern: Limits community access to countryside and public rights of way.<br>Steeples Project Feature: Impact on footpaths, bridleways, and local amenity Reference: Policy 12.2d Conflict / Concern: Fails to minimise impacts on residential amenity and tranquility. | **ES Chapter 6: Landscape and Visual Amenity and Residential Amenity [APP-064]** includes a Landscape and Visual Impact Assessment (LVIA).<br><br>This identified a range of localised significant effects on landscape character and visual amenity. These effects have been reduced through the design process and would be further reduced as the mitigation planting matures, as detailed in in section 3 and 9 of the **Outline Landscape Ecological Management Plan (oLEMP) [APP-116]** and secured by the LEMP, as set out in Requirement 6 (LEMP) of the **dDCO [APP-041]**.<br><br>There would be no restriction to use of the footpath network during the operation of the Proposed Development, with effects |

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| | | Steeples Project Feature: Large-scale infrastructure altering open countryside Reference: Paragraph 18.6 Conflict / Concern: States industrial-scale development is inappropriate in rural areas. | on footpaths reduced by offsets from the routes and new planting as detailed in paragraphs 3.6.1 to 3.6.8 of **ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]**.<br><br>Paragraph 6.8.1 to 6.8.9 of **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** sets out whilst there would be some localised significant effects on landscape character, key landscape features have been retained, including woodland, trees and the majority of the hedgerow network. New hedgerow planting would then far exceed the small areas of removal required to facilitate access. |
| RR-033/5 | Landscape and Visual | Steeples Project Feature: Large-scale solar panels and infrastructure Reference: Policy 5.1 Conflict / Concern: Fails to respect scale/design of rural character.<br><br>Steeples Project Feature: Large-scale infrastructure altering open countryside Reference: Paragraph 18.5 Conflict / Concern: Warns against large-scale infrastructure dominating landscape.<br>Steeples Project Feature: Removal of hedgerows and alteration of open fields Reference: Policy 5.2f Conflict / Concern: Harms important views and landscape setting.<br><br>Steeples Project Feature: Clearing farmland and installing solar panels Reference: Policy 6 Conflict / Concern: Damages the character of the countryside. | The purposes of the objectives within Sturton Ward Neighbourhood Plan ('SWNP') are clarified in paragraph 6.1 of the SWNP to as – "r*eflect the aspirations of the residents of Sturton Ward*". They are not adopted policies within the neighbourhood plan that, in turn, form part of the local plan. Objectives hold no weight in the determination process.<br><br>Concerns about landscape harm are addressed by previous applicant responses above.<br><br>Appendix D of the **Planning Statement [APP-182]** contains a Local Policy Accordance Table. This table, on pages 73 to 101, confirms the Applicants' position that the Proposed Development complies with relevant policies or relevant parts of policies of the Sturton Ward Neighbourhood Plan. |

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| | | Steeples Project Feature: Rows of solar panels, fencing, and substations Reference: Community Objective 4 Conflict / Concern: Fails to protect valued landscapes and rural character. Steeples Project Feature: Potential rerouting or visual intrusion on footpaths Reference: Policy 10 Conflict / Concern: Fails to protect local green infrastructure and access routes. | *Policy 5.1 (Design Principles) and 5.2f (be of a scale and mass that is sympathetic to heritage assets and their setting in accordance with National and District policies).*<br><br>As detailed in the **Design and Access Statement [APP-184]** and Section 6 of the **Planning Statement [APP-182]**, the Proposed Development has undergone an iterative design process. Design decisions have been informed by outcomes of statutory consultation and stakeholder engagement, ongoing environmental assessments, engineering and design considerations, and collaboration with other developers. Design objectives were developed at an early stage and have guided the Proposed Developments design response to the local context to develop a good design that balances the need to maximise renewable energy generation from the Proposed Development, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has included:<br>• Delivery of significant amounts of affordable renewable energy to support policy objectives and national targets for reducing carbon emissions to net zero by 2050;<br>• Delivery of improved energy resilience, affordability and security by diversifying energy production and stored energy;<br>• Contribution towards strategy improvements to local ecology and biodiversity; |

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| | | | • Develop a Proposed Development sensitive to surrounding landscape, limiting impact on views for key landscape receptors, residential properties and recreational routes;<br>• Develop a Proposed Development sensitive to heritage assets and settings;<br>• Safeguard surrounding hydrological systems and resilience to flooding without increasing flood risk elsewhere taking into account impacts of climate change;<br>• Develop a Proposed Development sensitive to existing land quality; and<br>• Provide safe access, minimise impact on the local highway network; and protect and enhance existing Public Rights of Way ensuring continued safe use.<br><br>The design process, basis of design decisions, and evolution of the Proposed Development's design is summarised in section 3.6 of ES **Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** and section 5 of the **Design and Access Statement [APP-184]**.<br><br>The Proposed Development includes the retention of hedgerows, woodland, ditches and ponds on the site where possible, and the planting of new trees woodland, hedgerows and species-rich planting across the majority of the site as well as various ecological and biodiversity enhancements as detailed in **ES Chapter 7: Ecology and Biodiversity [APP-065]**. |

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| | | | With regards Cultural Heritage, the design of the Proposed Development has been developed to minimise harm to non-designated heritage assets and their settings through embedded mitigation, avoiding archaeological sensitive areas entirely or preserves them in situ i.e. by mounting solar panels in concrete feet.<br><br>An assessment of the likely significant effects of the Proposed Development on Heritage Assets, including a description of the heritage assets significance, is included within **ES Chapter 9: Cultural Heritage [APP-067]** in accordance with NPS EN-1 paragraphs 5.9.9 to 5.9.12 and NPS EN-3 paragraphs 2.10.107 to 2.10.119.<br><br>Residual impacts upon the setting of designated assets are limited to 6 designated heritage assets and are less than substantial see **ES Chapter 9: Cultural Heritage [APP-067]**. In the case of the Proposed Development, which is time limited (NPS EN-3 paragraph 2.10.160), the significant public benefits of the Proposed Development in terms of renewable energy generation and climate change benefits clearly outweigh the reversible less than substantial harm to the No.6 identified designated heritage assets and low level less than substantial residual harm to non-designated heritage assets. |

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| | | | Policy parts 2a, b, c, e, g, 3a, c and 4 have been excluded from this table as they are not relevant for the Proposed Development; they relate more to proposals for housing development.<br>The Proposed Development is therefore considered to comply with relevant requirements of policy 5.<br><br>*Policy 6 (Protecting the historic environment)*<br>**ES Chapter 9 Cultural Heritage [APP-067]** summarises the assessment of effects of the Proposed Development on the historic environment.<br><br>The design of the Proposed Development has been developed to minimise harm to non-designated heritage assets and their settings through embedded mitigation, avoiding archaeological sensitive areas entirely or preserves them in situ i.e. by mounting solar panels in concrete feet.<br><br>Residual impacts upon the setting of designated assets are limited to 6 designated heritage assets.<br><br>In the case of the Proposed Development, the significant public benefits of the Proposed Development in terms of renewable energy generation and climate change benefits clearly outweigh the reversible less than substantial harm to the 6no. identified designated heritage assets and low level less than substantial residual harm to non-designated heritage assets. |

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| | | | Policy part 2 has been excluded from this table as it is only applicable for Proposed Developments that are gardens, open spaces and fields to the south of North and South Wheatley and lie within the Conservation Area.<br><br>The Proposed Development is therefore considered to comply with Policy 6.<br><br>*Policy 10 (Housing Mix and Type)*<br>Policy 10 is for a specific type and forms of development (housing mix and type) – it does not relate to a renewable energy project of solar and Battery Energy Storage Systems.<br><br>With regards concerns about green infrastructure and access, the Proposed Development includes the retention of hedgerows, woodland, ditches and ponds on the site where possible, and the planting of new trees woodland, hedgerows and species-rich planting across the majority of the site as well as various ecological and biodiversity enhancements as detailed in **ES Chapter 7: Ecology and Biodiversity [APP-065]**. This will improve green infrastructure.<br><br>**Outline Landscape Ecological Management Plan (oLEMP) [APP-116]** provides further details on the green infrastructure to be planted and secured by Requirement 6 (LEMP) of the **dDCO [APP-041]**). |

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| | | | There would be no restriction to use of the footpath network during the operation of the Proposed Development, with effects on footpaths reduced by offsets from the routes and new planting as detailed in paragraphs 3.6.1 to 3.6.8 of **ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]**.<br><br>*Paragraph 18.5*<br>Paragraphs 18.5 is a precursor to policy 12 for low carbon energy homes.<br><br>Paragraph 18.5 states "On appropriate sites in the countryside, the use of solar energy is also supported provided the development: a) is effectively screened from view; and b) does not harm the landscape character of the Ward; and c) is supported by a comprehensive package of ecological mitigation and enhancement measures". Policy 2a, discussed later in this response, considers screening and landscape character. Policy 2b, covers enhancing biodiversity. In response to policy 2b, As detailed in section 3.6 of **Design and Access Statement [APP-184]** and Section 5 of the **Planning Statement [APP-182]**, the Proposed Development has undergone an iterative design process. Design decisions have been informed by outcomes of statutory consultation and stakeholder engagement, ongoing environmental assessments, engineering and design considerations, and collaboration with other developers. Design objectives were developed at an early stage and have guided the |

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| | | | Proposed Developments design response to the local context to develop a good design that balances the need to maximise renewable energy generation from the Proposed Development, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable.<br>A range of 'designed-in' primary ecological mitigation, compensation and enhancement measures are part of the design of the Proposed Development. Biodiversity features have been considered iteratively as the detail of the Proposed Development has evolved, and the incorporated biodiversity measures form an integral part of the Proposed Development, designed specifically to avoid or reduce biodiversity effects wherever possible, and to build biodiversity enhancement into the Proposed Development. Within the Proposed Solar Areas, priority habitats (such as hedgerows, trees, arable field margins, woodland, watercourses, ponds and scrub) will be retained and incorporated into semi-natural habitat buffers. A schedule of proposed buffers to these habitats is provided in **ES Chapter 7: Ecology & Biodiversity [APP-065]**. This will retain habitat for protected / notable species and ensure retention of habitat connectivity through the Proposed Development and the local landscape.<br><br>Details of work necessary to retain, create and manage retained and new ecological features during and after construction are provided in **ES Appendix 4.1 - Outline Construction Environmental Management Plan (oCEMP) [APP-089]** and **ES** |

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| | | | **Appendix 7.14 Outline Landscape Ecological Management Plan (oLEMP) [APP-116]** for the Proposed Development.<br>A skylark mitigation strategy is presented in **ES Appendix 7.13 [APP-115]**, which shows further details and the locations of the measures at the Site.<br><br>Requirement 6 (LEMP) and Requirement 7 (CEMP) of the **dDCO [APP-041]** secure that a LEMP and CEMP must be approved by the local planning authority prior to the relevant phase of the authorised development commencing.<br><br>The Proposed Development is therefore considered to comply with Policy 2b. |
| RR-033/6 | Cultural Heritage | Steeples Project Feature: Proximity to village core or heritage assets Reference: Policy 7 Conflict / Concern: Harms heritage setting and rural environment. | This comment does not relate to any specific heritage asset. Proximity of development to heritage assets is not intrinsically harmful unless it harms an element which contributes to the significance of the assets.<br><br>The setting of heritage assets in the vicinity of the Proposed Development has been considered within the **ES Chapter 9: Cultural Heritage [APP-067]** and **Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. The rural environment is not a heritage asset. However, the rural surrounds have been considered in so far as any contribution they make to the significance of relevant assets. |

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| RR-033/7 | Ecology and Biodiversity | Steeples Project Feature: Loss of farmland and hedgerows; construction works Reference: Policy 9 Conflict / Concern: Damages biodiversity networks and habitats. | Policy 9 of the adopted Sturton Ward Neighbourhood Plan relates to: 'Improving broadband and mobile connectivity'. This policy is not relevant with regards this NSIP.<br><br>In response to biodiversity networks and habitats concern raised, **ES Chapter 7 : Ecology & Biodiversity [APP-065]** and **ES Appendix 7.14 Outline Landscape Ecological Management Plan (oLEMP) [APP-116]** set out 98.5% of the ca. 70 km of existing hedgerows will be retained and managed for biodiversity, and a further 25.3 km of hedgerows will be created.<br><br>This means the proposed development will result in an overall increase of 15 km of hedgerows. In addition, areas of farmland in the biodiversity mitigation areas will be enhanced to provide more optimal management practices for breeding farmland birds, create new ponds, and put in place new tree planting. Requirement 6 (LEMP) of the **dDCO [APP-041]** secures further LEMP details.<br><br>These plans comply with Policy 2b of the adopted Sturton Ward Neighbourhood Plan regarding enhancing land for biodiversity. |
| RR-033/8 | Cultural Heritage | Steeples Project Feature: Visual impact on historic setting Reference: Community Objective 5 Conflict / Concern: Harms the setting of heritage assets and rural views. | The purposes of the objectives within Sturton Ward Neighbourhood Plan ('SWNP') are clarified in paragraph 6.1 of the SWNP to as – "reflect the aspirations of the residents of Sturton Ward". They are not adopted policies within the neighbourhood plan that, in turn, form part of the local plan. Objectives hold no weight in the determination process. |

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| | | | With regards harm to setting of heritage assets and rural views, visual impacts and views to/from of heritage assets in the vicinity of the Proposed Development have been considered within the **ES Chapter 9: Cultural Heritage [APP-067]** and **Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. General views of the surrounding land are a matter of amenity and landscape and not a heritage matter. Views to/from identified heritage assets have been considered and assessed in so far as any contribution they make to the significance of relevant assets. |
| RR-033/9 | Ecology and Biodiversity | Steeples Project Feature: Clearance of farmland and fencing Reference: Community Objective 7 Conflict / Concern: Reduces biodiversity, hedgerows, and wildlife habitats. | The purposes of the objectives within Sturton Ward Neighbourhood Plan (SWNP) are clarified in paragraph 6.1 of the SWNP to as – "reflect the aspirations of the residents of Sturton Ward". They are not adopted policies within the neighbourhood plan that, in turn, form part of the local plan. Objectives hold no weight in the determination process.<br><br>Community objective 7 relates to promotion of tourism and is not relevant to this NSIP.<br><br>With regards biodiversity, hedgerows and wildlife concerns, the proposed changes to hedgerow assets are described in the responses above. With regards to biodiversity and wildlife, an **Environmental Statement [APP-054 to APP-078]** has been undertaken to inform the Planning Inspectorate's decision – in summary, it was concluded that there will be no significant adverse effects to wildlife and biodiversity apart from displacement effects on skylark (**ES Chapter 7 - Ecology and** |

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| | | | **Biodiversity [APP-065]).** To minimise this, a skylark mitigation strategy has been prepared (**ES Appendix 7.13 Skylark Mitigation Strategy [APP-115]**), which includes proposals to increase the carrying capacity of the arable land in the biodiversity mitigation areas for skylark by creating conditions that could allow for an estimated 58 skylark breeding territories to be formed. This accords with Policy 2b of the adopted Sturton Ward Neighbourhood Plan, which states: "*If significant ecological impacts are identified, appropriate mitigation or compensation measures will be required.*" |
| RR-033/10 | Size and Scale | Steeples Project Feature: Large-scale solar panels covering ~2,300 acres Reference: Policy 1 Conflict / Concern: Fails to direct development to sustainable locations; outside settlement boundaries. | *Policy 1 (Sustainable development, infill and the development boundary) (2 Development proposals outside the defined development boundaries will be carefully controlled in accordance with national and local planning policies).*<br><br>Policy 1 Part 1 refers to development within defined limits of identified settlements and is not relevant to this NSIP.<br>Policy 1 Part 2 refers to development that is outside developments limits of the identified settlements and is relevant to this NSIP.<br><br>Appendix C and Appendix D of the **Planning Statement [APP-182]** demonstrate how the Proposed Development complies with National and Local policy.<br><br>The Proposed Development is therefore considered to comply with Policy 1. |

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| | | | Paragraph 4.1.15 of NPS EN-1 states if there is a conflict with a local plan (SWNP forms part of the local plan) and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure. Should policy conflict be identified at national level, in the planning balance this conflict would be outweighed by the benefits of the Proposed Development set out in Paragraphs 5.1 1 to 5.1.38 of the **Planning Statement [APP-182]**. |
| RR-033/11 | Land Use | Steeples Project Feature: Land diverted from housing or local community uses Reference: Policy 2a.1 Conflict / Concern: Does not prioritise community housing or local facilities. | This proposal is not a residential development, and there is no policy requirement to provide community housing or a local facility. There are, however, several localised economic, social and environmental benefits for local residents as summarised in paragraph 7.9 of the **Planning Statement [APP-182]**.<br>*Policy 2a (Protecting the landscape character, significant green gaps and key views).*<br><br>Within the **Order Limits [APP-009]**, no existing trees will be removed, and hedgerow removal is limited to 1070m mitigated by additional new hedgerow and tree planting. New hedgerow and tree planting will improve linkages and strengthening existing planting belts.<br><br>All watercourse within and near the site will be retained. SUDs surface water drainage will be utilised with no mains foul water connection required by the Proposed Development Paragraphs 6.3.11 and 6.3.12 of the **Planning Statement [APP-182]** set out that the construction and operational phases would |

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| | | | cause notable, significant effects to the landscape character of the site but that these effects would be temporary. Furthermore, the Proposed Development includes notable planting of new trees, woodland and hedgerows, as well as species rich planting across the majority of the Site. This is discussed and further detail can be found in **ES Chapter 6 Landscape and Visual Impact and Residential Amenity [APP-064]**. Paragraph 5.10.5 of NPS EN-1 states: "Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".<br><br>The Proposed Development includes the retention of woodland, trees, watercourses and ditches on the site as well as the majority of existing hedgerows. Planting of new trees woodland, hedgerows and species-rich planting across the majority of the site mitigates hedgerow loss and forms part of the various landscape, ecological and biodiversity enhancements with further information provided in **ES Chapter 7 Ecology and Biodiversity [APP-064]**.<br><br>Policy parts 2 and 3 have been excluded as they are not relevant to the Proposed Development.<br><br>The Proposed Development is therefore considered to comply with relevant parts of Policy 2a. |

## Table 2-5: Sturton-le-Steeple Parish Council

| ID | Theme | Verbatim Comment | Response |
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| RR-029/1 | Cumulative impacts / Landscape and visual / Cultural heritage / Land use / Health and wellbeing | STEEPLE RENEWABLES PROJECT NSIP Registration comments on behalf of Sturton-le-Steeple Parish Council Introduction 1. These registration comments are submitted by Sturton-le-Steeple Parish Council ("the PC") on behalf of residents in the parish. The PC objects to the Steeple Renewables Project ("the Proposals") for the following reasons which are expanded upon below: a. Cumulative impacts of this and other major development projects both underway and planned in the local area have not been adequately assessed. b. Substantial adverse impacts on the local landscape. c. Substantial adverse impacts on the rich cultural heritage and archaeological significance of the site and the surrounding area. d. Harmful loss of best and most versatile agricultural land. e. Detrimental impacts on the health and well-being of local residents. | The Applicant notes this comment. |
| RR-029/2 | Cumulative impacts | Cumulative impacts Context 2. By way of context, residents of the parish and surrounding villages are suffering from consultation fatigue due to the very large number of applications for industrial projects in the local area. The pace of change in the community is unprecedented. This is illustrated by: (i) the substantial planning history at the West Burton Power Station, its associated West Burton Bole Ings Ash site and the neighbouring Sturton-le-Steeple quarry which is detailed at Appendix B to the Applicant's Planning Statement [EN010163/APP/7.1]; | The Applicant is sympathetic to Sturton-le-Steeple Parish Councils position regarding consultation fatigue. In the case of this project, public consultation has been appreciative of this. The **Consultation Report [APP-047]** summarises the consultation events carried out by the Applicant. These events have been balanced to ensure they are sufficient to comply with the consultation requirements set out in the Planning Act (PA) 2008, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('APFP Regulations'), the |

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| RR-029/3 | Cumulative impacts | and (ii) the cumulative long and short list of relevant planning applications at ES Appendix 2.3 [EN010163/APP/6.3.2]. 3. There are currently more than 14 development projects (4 of which are NSIPs) with varying levels of impact on the parish which are all at different stages of the planning and development consent process. These include:<br>a. The development of Sturton-le-Steeple Quarry (NSIP);<br>b. The North Humber to High Marnham National Grid (NSIP);<br>c. The decommissioning of West Burton Power Station; and<br>d. The Spherical Tokamak for Energy Production ("STEP") plant which the government is planning to build at the West Burton power station site. | Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations') and the Infrastructure Planning (Miscellaneous Provisions) Regulations 2024; ensure sufficient information is provided to organisations including Sturton-le-Steeple to be kept informed and involved in the project as it evolves without overloading and consulting on the project when not necessary to do so. Consultation has consisted off initial early engagement (July-September 2023), non-statutory consultation (23 October to 06 December 2023), Statement of Community Consultation (SoCC) (March to December 2024), Statutory Consultation (20 January to 03 March 2025) and Ongoing Engagement (March 2025 to May 2025). |
| RR-029/4 | Cumulative impacts / Health and Wellbeing | 4. There are also a number of smaller projects taking place within the Parish. 5. This is making it very difficult for local residents and business owners to keep up to date. They are overwhelmed with information which is causing heightened anxiety and confusion amongst the community. Accordingly, while the PC has endeavoured to include as much detail as possible in these registration comments, it reserves the right to add to these at the appropriate junctures in the examination process as it has more time to work through the huge volume of documentation associated with the application. | As per the above, the Applicant is sympathetic to Sturton-le-Steeple Parish Council's position of consultation fatigue and how this has been impacted by the Proposed Development. Section 7, and in particular tables 7.1 and 7.2 of the **Health Impact Assessment [APP-183]** submitted with the application addresses how the Proposed Development may affect mental health and wellbeing of local residents.<br><br>Best practice construction activities will be implemented at Construction (**ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089] and Appendix 13.2 Outline Construction Traffic Management Plan [APP-129]).**<br>During the operational phase **(ES Appendix 4.4 Outline Operational Management Plan (oOEMP) [APP-092]** it is |

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| | | | acknowledged that the change in land use, landscape, visual and recreational amenity impacts could have an indirect effect on the mental health of some receptors. Nevertheless, the mitigation proposed will reduce the physical impacts as far as possible over time and, as such, should contribute to alleviating any indirect mental health impacts.<br><br>Decommissioning stage has also been considered **(ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090].**<br><br>Requirements 7 (CEMP), 8 (CTMP), 9 (OEMP) and 21 (Decommissioning and Restoration) of the **dDCO [APP-041]** secure the delivery of relevant control documents to ensure that the mitigation relied on by the Proposed Development is delivered. |
| RR-029/5 | General | 6. Steeple Renewables is by far, the most concerning project threatening our local community. The negative impact of which will far outweigh any perceived benefits. | The Applicant notes this comment. |
| RR-029/6 | Cumulative impacts / Environmental Statement / Construction | Failure to adequately assess cumulative impacts<br>7. The applicant has carried out some assessment of the cumulative impacts of other projects as part of the relevant chapters in its Environmental Statement [EN010163/APP/6.2.0 to 6.2.19]. However, there are at least three aspects where the PC considers this assessment to be inadequate: a. The first, is the failure to assess the cumulative impacts of the construction phases of these various projects. While construction impacts are generally viewed as temporary, local residents are concerned | The cumulative impact assessment work set out within relevant chapters of the **Environmental Statement [APP-058 to APP-075]** confirms the Applicant has had regard to potential cumulative effects from the construction periods associated with other nearby projects where it was considered that there was the potential for the construction periods to overlap. Best practice construction activities will be implemented as set out in **ES Appendix 4.1 Outline Construction Environmental** |

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| | | about the cumulative impact of multiple industrial projects which will become increasingly disruptive over time. It will also result in disruption and negative impacts of construction being felt by the local community for an extended period of time. This does not appear to have been considered by the Applicant in its assessments. | **Management Plan (oCEMP) [APP-089] and Appendix 13.2 Outline Construction Traffic Management Plan [APP-129]).** Requirements 7 (CEMP) and 8 (CTMP) of the **dDCO [APP-041]** secure that the authorised development cannot commence until a CEMP / CTMP for that phase is approved by the local planning authority. |
| RR-029/7 | STEP Fusion / Cumulative impacts | b. The second, is the exclusion of the STEP project from the assessment of cumulative impacts due to it still being in the early stages. This is a large-scale Government-backed initiative which will have very real impacts on the local community. Even if the limited detail available at this stage prevents a full cumulative effects assessment from being carried out, it should at the very least be taken into consideration when assessing the long term cumulative effects of development on this community. | NSIP: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025) note recommends that a wide range of future projects are included within the cumulative assessment which can be tiered (from Tier 1-3) according to how far advanced the development is within the planning system and to the level of detail that is likely to be available for each tier, with Tier 3 projects being the least advanced in the process.<br><br>The Applicant notes the UK Government has confirmed the West Burton A Power Station site will be home to the ground-breaking Spherical Tokamak for Energy Production (STEP) prototype fusion energy plant. Although the location of this development has been selected, this project is in its infancy with no registered intention for development such that the Tier 3 requirements are not satisfied. Therefore, due to the infancy stage of development for the STEP proposal, this ES has not considered this development further as detail is not available to carry out a robust assessment. The Applicant understands the Proposed Development will not cause risk to the STEP project in regard to |

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| | | | connection capacity at National Grid West Burton Substation however, as each project is subject to separate gird connections. |
| RR-029/9 | Cumulative Impacts / Landscape and Visual Assessment | c. The third is the apparent failure to produce any visualisations of cumulative effects as part of the Landscape and Visual Impact Assessment. Indeed, the assessment of cumulative effects in the Landscape chapter of the Environmental Statement [EN010163/APP/6.2.6] is very surface level. | **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** includes a Landscape and Visual Impact Assessment and in section 6.10 includes a cumulative impact assessment which considered the potential for cumulative visual effects with other nearby developments. Whilst visualisations can be a useful visual aid to assist with the LVIA process, there are practical issues showing other future development including precise measurements and they do not replace the need for assessment in the field. It is not considered that cumulative visualisations would provide any further information that would change the judgements set out in the LVIA. There are very limited locations from which the majority of the other cumulative sites would be able to be seen alongside the Steeple Renewables Project. |
| RR-029/10 | Landscape and Visual / Cumulative Impacts | (2) Landscape impacts 8. The PC has three main concerns regarding the landscape impacts of the scheme: a. The first has been addressed above and relates to the inadequate assessment of cumulative impacts and failure to produce visualisations. Linked to this is a concern that cumulative effects have been downplayed on the basis that the landscape has already been, or will already be negatively impacted by existing energy development (see e.g. para 6.10.9 of Chapter 6 of the Environmental Statement). Existing harmful development should not serve as a carte blanche for further harmful development. For | Section 6.6 of **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** considers baseline conditions that includes energy infrastructure used to prepare an adequate assessment to report on reasonable worst-case scenarios. |

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| | | example, viewpoint 20B of the photomontages at Appendix 6.2 to the Environmental Statement [EN010163/APP/6.3.6] shows how a single detracting feature in an otherwise open, agricultural landscape (in this case the existing West Burton Power Station) can be compounded by further development, rendering the entire view industrial in nature. | |
| RR-029/11 | Landscape and Visual | b. The second is the apparent assumption that simply screening off the proposed development from view with the planting of large hedgerows will result in their being no negative visual effects. In some instances, the closing off of a previously open view across the landscape is itself harmful. Particularly stark examples of this can be seen in viewpoints 17B, 17C and 17D of the photomontages Appendix 6.2 to the Environmental Statement [EN010163/APP/6.3.6] (in both summer and winter views). | **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** concludes on visual effects in section 6.10 and 6.11, as well as mitigation.<br><br>Careful consideration was given to the design of the proposed mitigation planting and indeed to the layout of the Proposed Development and how it would relate to nearby properties, settlements and public rights of way. Significant effects are limited with the majority the magnitude of impact would be no greater than low, resulting in moderate to minor effects. Where hedgerows are proposed close to public rights of way, a wide corridor is provided either side of the route.<br><br>Many of the hedgerows proposed would replace hedgerows that have been lost but would have previously been present in the landscape previously or replicate existing patterns of hedgerows to allows maximum biodiversity benefits through providing connectivity of routes.<br><br>Landscape mitigation and enhancement measures proposed to be included as part of the Proposed Development, and these are |

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| | | | illustrated in Figure 6.9 **Landscape and Ecological Mitigation Strategy [APP-160]**.<br>Additional landscape details are secured by Requirement 6 (LEMP) of the **dDCO [APP-041].** |
| RR-029/12 | Landscape and Visual / Cultural heritage | c. The third is the failure of the LVIA to adequately have regard to the cultural heritage and historic significance of the Site and surrounding area. This was a point raised by consultees leading to assurances from the Applicant that the LVIA has been "cognisant" of the findings of the Cultural Heritage Chapter of the Environmental Statement. However, there does not appear to be any concrete evidence of this "cognisance" in the LVIA itself. For example, there is no reference to the significance of historic green lanes and field patterns nor to Bassetlaw's important Pilgrim Trail ( (Redacted)) which passes through the Site. As the Applicant recognises (see para 6.3.22 of the Landscape Chapter of the ES), "people at tourist attractions with a focus on a specific view" and "visitors to historic features/estates where the setting is important to an appreciation and understanding of cultural value" increases the sensitivity of visual receptors. See also historian Adrian Gray's comments on the historical significance of the landscape in this area set out below.<br>(3) Heritage and archaeological impacts 9. The site and surrounding areas benefit from a wealth of cultural heritage and the impact on a number of important historic features does not appear to have been assessed (or adequately assessed) by the Applicant in its Cultural Heritage assessment. | It An LVIA is concerned with a user's amenity in relation to an asset and that assessment. A cultural heritage assessment relates to the archaeological, architectural, artistic or historic interest of an asset or its setting.<br><br>The Applicant has considered the historic interest in surrounding assets in **ES Chapter 9: Cultural Heritage [APP-067]**. There are no designated heritage assets within the Order Limits. The 3km study area surrounding the site contains No.6 Scheduled Monuments; No.9 Grade I Listed Buildings; No.8 Grade II* Listed Building; No.123 three Grade II Listed Buildings; and No.2 Conservation Areas. There are no Registered Parks and Gardens, Registered Battlefields or World Heritage Sites located within the 3km study area. However, only No.6 designated heritage assets are considered to be impacted by the Proposed Development:<br><br>• Segelocum Roman town Scheduled Monument (minor adverse);<br>• Medieval settlement and open field system immediately south east of Low Farm Scheduled Monument (minor adverse); |

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| | | | • Grade I Listed Church of St Martin (minor adverse); • Grade II* Listed Church of St Peter and St Paul (moderate adverse);<br>• Grade II* North Leverton Windmill (minor adverse); and,<br>• Grade II Listed Manor Farmhouse (minor adverse).<br><br>Residual impacts upon the setting of the 6 previously mentioned designated heritage assets and are less than substantial. In the case of the Proposed Development, which is time limited (NPS EN-3 2.10.160), the significant public benefits of the Proposed Development in terms of renewable energy generation and climate change benefits clearly outweigh the reversible less than substantial harm to the No.6 identified designated heritage assets and low level less than substantial residual harm to non-designated heritage assets.<br><br>The Applicant has responded specifically to the Pilgrim Trail further below. |
| RR-029/14 | Cultural heritage | The following features of historic significance must be taken into account in assessing the impacts of the Proposals: a. Sturton-le-Steeple's Christian heritage; b. Historic landscape features; c. Littleborough; d. Habblesthorpe; and e. The West Burton Round.<br>(a) Sturton-le-Steeple's Christian heritage | Paragraphs 2.10.107 to 2.10.119 of NPS EN-3 contain specific considerations for solar projects, their lifespan and potential impact on heritage assets and setting. Paragraph 2.10.160 of NPS EN-3 discusses the importance of the time limited nature of proposed schemes, such as the Proposed Development, when considering impacts of any indirect effect of solar schemes on the historic environment. Sturton le Steeple's Christian heritage can contribute to the significance of an asset where relevant but is not a feature to assess in its own right. Relevant heritage assets, |

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| | | | e.g. the Grade II* Listed Church of St Peter and St Paul in Sturton le Steeple are considered where relevant and are included in **ES Chapter 9 - Cultural Heritage [APP-067],** and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. This includes consideration of important elements of their setting and views to/from the assets. |
| RR-029/15 | | 10. Sturton is a village of incomparable significance in English Christian history, being one of the epicentres of the Pilgrim story. This was most recently explained in: a. Nick Bunker, Making Haste from Babylon, Penguin, 2014 b. Michael Haykin and others, Strangers & Pilgrims on the Earth, H & E, 2020. c. Adrian Gray, Restless Souls, Pilgrim Roots, BWR, 2020 11. The combination of significant figures that emerged here make Sturton of unparalleled importance in respect to its size. John Lassells (d1546) emerged as one of the most significant leaders and martyrs of the English Reformation; John Smyth (c1554-1612), the first English Baptist, was born and educated here; John Robinson (1576-1625), the spiritual leader of the Mayflower Pilgrims was also born here; his sister in law, also born here, went to New England as the wife of the first leader of the Pilgrims. 12. The links with both Baptists and the Mayflower bring many American visitors to Sturton. Travelling through this district of Bassetlaw, they often comment that they at least have reached 'the real England' with its pattern of small villages and fields. This landscape will be destroyed by the proposals and the attraction of the area's heritage much reduced. Views across the fields to | The Pilgrim Trail is not considered as a single heritage asset, rather it is a local route which encompasses a series of historic sites associated with the origins of the Mayflower Pilgrims. It is notably, not in itself a historic pilgrimage route. The associated trail map provides a very large, broadly circular route (in excess of 50km covering the main identified sites), which appear be linked by modern roads which themselves will not be affected by the Proposed Development, and Development is to be offset from all routes. It is not a walking trail and there is nothing specific about the landscape around the settlements that forms part of the trail, it is about the settlements themselves, key buildings within, and their associations with key people linked to the Mayflower Pilgrims. The Site will not change any aspects of the Pilgrim Trail.<br><br>The Site itself does not form part of the Pilgrim Trail, whose connection is with the relevant churches and settlements, and none of the historic information presented would experience change as a result of the proposals. Related heritage assets e.g. the Grade II* Listed Church of St Peter and St Paul in Sturton le Steeple, are considered where relevant, and are included in **ES** |

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| | | the Sturton tower, familiar to Smyth and Robinson in their day, will be destroyed. | **Chapter 9 - Cultural Heritage [APP-067],** and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. |
| RR-029/16 | Landscape and Visual / Cultural heritage / Tourism | 13. The PC have been working directly with Bassetlaw District Council to enhance tourism for our area by commissioning an important piece of Sculpture that has been paid for through Rural England funding at a cost of £10,000 as well as a £1,000 donation from Pilgrims and Prophets Tourism. 14. The following three photos show the Sculpture, a very well attended opening event with representatives from Bassetlaw District Council and a local Councillor in attendance and the information board. | The Applicant notes this comment. |
| RR-029/17 | Heritage | 15. We are very proud of our Christian Heritage and strong links with the Mayflower Pilgrims. We are attracting tourism. We seek to advance this further by welcoming more visitors, using our focal point of the Sculpture and Information board, using our village hall facilities to provide refreshments and working directly with Bassetlaw District Council on promoting Sturton Le Steeple further. | The Applicant notes this comment. |
| RR-029/18 | Cultural heritage | 16. We have already had a significant number of tours to date to reflect our Christian Heritage. These have included international visitors. A most recent walking tour was oversubscribed, and an extra date had to be put in. I include a photo of the advertisement below: | The Applicant notes this comment. |
| RR-029/19 | Cultural heritage | 17. As noted above, Sturton is also part of Bassetlaw's important Pilgrim Trail, the route of which can be found here: a. Pilgrims Trail - Pilgrim Roots – Downloadable trail map, also this is the website with all the | The Applicant notes this comment. |

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| | | trails/videos information about the pilgrims. b. Pilgrim Trails - Sturton-Le-Steeple - Pilgrim Roots- This is the trail for Sturton that you can download and listen to on your phone. | |
| RR-029/20 | Cultural heritage / Tourism / Landscape and Visual | 18. We need to maintain and enhance this area, create a tourist attraction and work alongside Bassetlaw District Council in promoting our strong heritage. A large scale, inappropriately located solar farm will alas become the focal point of the village rather than a welcoming place for visitors and a celebration of our World Changing Heritage. (b) Historic landscape features.<br>20. The current landscape represents a form that came into being from the 1770s with the development of the Laneham Drainage Scheme, including the Catchwater Drain and major outfalls at locations such as West Burton. Field boundaries and rights of way were stablished in subsequent enclosures and these form a key part of the landscape. These patterns of 'green lanes' extend from Bole down to South Leverton and can be seen in this extract Leverton:<br>21. Many of these survive as 'green lanes', for example at South Leverton: | The Applicant appreciates that there may be a perception that the Proposed Development may impact tourism numbers. The Applicant does not agree with this perception, the Applicant has provided its assessment of the landscape and visual impacts of the Proposed Development, which consists in an environment already heavily modified by large scale energy infrastructure. The Applicant's conclusions on the Proposed Development's landscape impact are contained at paragraph 6.11.1 to 6.11.16 as well as Table 6.7 of **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064].** |
| RR-029/21 | Landscape and Visual / Cultural heritage | 19. Landscape Character Assessments should form a crucial element in any planning decisions. Around Sturton, the character and isolation of the former 'car' wetlands form key elements in their attraction but also help to explain the importance of Roman settlement in the area and how the | The historic landscape of the Site and specific features e.g. important hedgerows, and ridge and furrow are considered in **ES Chapter 9 - Cultural Heritage [APP-067],** and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**, and the |

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| | | separatist movement of the early 1600s managed to thrive – its isolation from the main centres of Church governance being significant in this. | Historic Landscape Characterisation study area of the area has been considered. |

## 2.2. Statutory Consultees

2.2.1. The table below set out the responses to the Relevant Representations from statutory consultees and the response from the Applicant.

### Table 2-6: National Highways

| ID | Theme | Verbatim Comment | Response |
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| RR-032/1 | Transport Assessment | Appendix 13.1 – Transport Assessment – (EN010163/APP/6.3.13) Site Access: We note that access to the site is not proposed directly onto the SRN. As such, Section 175(b) of the Highways Act 1980 (as inserted by The Infrastructure Act 2015) is not relevant. | This comment is noted by the Applicant. |
| RR-032/2 | Construction | Trip Generation: We note that the construction phase is expected to last 24 months in total, and this period is likely to generate the most significant traffic impacts on the highway network.<br>We note that deliveries are intended to be outside the typical AM and PM peak hours. We support this and would accept traffic impacts from these deliveries being discounted from any peak hour traffic impact assessment if there is an appropriate planning condition to ensure this is adhered to.<br><br>Trip Distribution: We welcome the provision of the flow diagram for the following scenarios: • Forecast Construction Delivery Traffic Peak Trip Generation at A1(M) Blyth Interchange. • Forecast Workforce Traffic Peak Trip Generation at A1(M) Blyth Interchange. | This comment is noted by the Applicant. |

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| | | We note that in Forecast Workforce scenarios, there will be traffic demands of 24 PCU/hr in the Forecast Construction Delivery (Month 7) and 59 PCU/hr (Month 22) impacting on the Blyth Interchange. | |
| RR-032/2 | Construction | We request that the monthly scenarios showing total development flows are created and the worse-case scenario be reported for our review. We further request that this demonstrates HGV movements, workforce traffic and total vehicles. This will allow us to identify the peak scenario accounting for the combined staff and construction delivery trips during the AM and PM peak hours.<br><br>Traffic Impact: When the trip generation and trip distribution have been agreed, National Highways will be in a better position to comment on the acceptability of the traffic impact of the proposed development and advise whether further junction capacity assessments are required on the SRN junctions. | It is noted that further information is requested.<br>This includes the request for monthly traffic flow diagrams which indicate the total vehicles, HGV, light vehicle breakdown for AM and PM peak periods.<br><br>The monthly, weekly, daily and hourly traffic flows have been provided in table 6'1 of the **Transport Assessment (TA) [APP-128]**, submitted with the DCO.<br><br>Forecast Traffic Impact on A1(M) Blythe Interchange for the AM and PM peak periods for 'Month 7' (peak delivery month) and 'Month 22' (peak construction worker trips) are provided in Appendix G of the TA and summarised in Chapter 8 of the TA (traffic flow diagrams provided in Plates 8.1 and 8.2).<br><br>On the basis that the above has been provided for the two 'peak' monthly scenarios for the 24-month construction programme, and the other construction months will have less impact on the SRN, it is considered that the worst case has been submitted, and therefore the other months are therefore not needed. |

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| RR-032/3 | Construction | We acknowledge that a Construction Traffic Management Plan (CTMP) will be implemented during the construction phase and National Highways should be consulted on this. The CTMP should cover the anticipated construction traffic flow during AM and PM peak hours in the month when the maximum construction traffic volume is expected. | The Applicant has included Requirement 8 (CTMP) in the **dDCO [APP-041]**. This ensures that no phase of the authorised development is to be commenced until a CTMP covering that phase and in accordance with the outline CTMP has been submitted and approved by the local planning authority in consultation with the highway authority for the highway(s) to which the CTMP for that phase relates.<br><br>The applicant considers therefore that National Highways will be consulted, as is already secured in the dDCO.<br><br>The **oCTMP [APP-129]** includes reference to the AM and PM peak hours being avoided where possible for deliveries. The CTMP will be in place at all times during the construction phase of the authorised development and therefore will be in place during maximum flow of construction traffic. |
| RR-032/4 | Operation | Operational Phase: We note that the level of trips associated with the operational phase are likely to be less than during the construction phase. Given the nature of the site and the proposed level of trips during the operational phase, National Highways is content that the level of traffic during the operational phase will not have a material impact on the SRN. | This comment is noted by the Applicant. |
| RR-032/4 | Decommissioning | National Highways requests that further information regarding the decommissioning phase for the proposed development is provided for our review. | The trips associated with the decommissioning phase are unknown at this stage as this will take place in 40 years' time. Requirement 21 of the **dDCO [APP-041]** secures further details about the decommission and restoration phase prior to decommissioning taking place. |

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| RR-032/5 | Abnormal Loads | Abnormal Loads: We note that Abnormal Loads and Abnormal Indivisible Loads (AILs) will be routed via the A1(M). As such, we request that swept path analysis is conducted to demonstrate that SRN junctions can accommodate the abnormal loads, and that the drawings of this are provided for our review.<br>In addition, we further request that the proposed routing along with details of any height and weight constraints that may affect the movement of AILs, are provided for our review.<br>Furthermore, we seek clarification on the total number of AIL movements anticipated, including their dimension and expected frequency in relation to the proposed development | The only abnormal loads associated with the construction phase will be loads which are classed as heavy loads (over 44 tonnes). There will be no loads which will be over 18.65 metres long, or over 2.9 metres wide.<br><br>As stated in the **TA [APP-128]** submitted with the DCO (paragraph 6.12), "a small number of abnormal indivisible loads over the 24-month construction period (approximately between five and 10 vehicles in total) will be required to transfer heavier equipment such as transformers. These will be classed as 'heavy' loads and will be transported on 16.5m articulated vehicles". An "Abnormal Indivisible Loads Plan" is also provided in Chapter 9 of the **oCTMP [APP-129]** to assist in the management of the vehicles.<br><br>As the A1(M) junction 34 is a DMRB compliant roundabout, it is therefore considered that it can cater for 16.5m HGVs. Therefore, tracking is not required. |
| RR-032/6 | Traffic and Access | Environmental Statement Chapter 13 Traffic and Access – (EN010163/APP/6.2.13) We have also reviewed the Traffic and Access Chapter of the Environmental Statement (Chapter 13) and have the following comments to make.<br>As the A1 (M) has been identified as a key route for access to the site – particularly for Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs) associated with the construction phase – National Highways requests that the A1 (M) be included in the assessments, in accordance with the IEMA Guidelines for the | The Applicant attended two pre-application meetings with National Highways for (dated 09/12/2024 and 15/04/2025) to scope the assessment for the DCO. This matter was not raised by National Highways as a requested input at either meeting. During pre-application discussions, National Highways confirmed that there was no existing capacity or safety issues at junction 34 of the A1(M). |

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| | | Environmental Assessment of Traffic and Movement (July 2023). Alternatively, if the A1 (M) has not met the thresholds to be assessed, National Highways requests that evidence / confirmation of this be provided for our review.<br>Standing advice to the Planning Inspectorate The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.<br>Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.<br>These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon. | As indicated in the **TA [APP-128]**, the traffic impact at A1(M) junction 34 is forecast to be 336 forecast daily trips during the peak construction delivery (in Month 7). The forecast daily two-way forecast trips for the peak workforce construction traffic (in Month 22) is forecast to be 350 trips.<br><br>A Construction Workforce Travel Plan will also be implemented and is secured through Requirement 8 of the **dDCO [APP-041]** as it is required through Chapter 8 of the **oCTMP [APP-129].**<br>We conclude that the A1(M) has not met the threshold to assess. Section 4 (legislation and policy context), section 5 (needs and benefits), 6 (Planning Appraisal) and 7 (Planning Balance and Conclusion) as well as Appendix C (National Policy Accordance Table) and Appendix D (Local Policy Accordance Table) of the **Planning Statement [APP-182]** confirms how the proposal complies with relevant planning policies.<br><br>Of particular relevance is paragraph 5.14.4 of NPS EN-1 that confirms the SoS should only consider preventing or refusing development on highway grounds if there is an unacceptable impact on highway safety or severe residual cumulative impact on the road network.<br><br>Paragraph 2.10.123 of NPS EN-3 goes further, stating an application should assess various potential routes to the Site for the delivery of materials and components, in order to select the |

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| | | | most appropriate route, taking into consideration the quality and capacity of existing road infrastructure.<br><br>**ES Chapter 13: Transport and Access [APP-071]** has assessed the impact of vehicle movements generated by the Proposed Development and there are not expected to be any significant highway impacts.<br><br>**ES Appendix 13.2 outline Construction Traffic Management Plan (oCTMP) [APP-129]** has been submitted in support of the Proposed Development. It includes measures to manage construction vehicle access and routing to the order limits. This includes measures to discourage and limit access to the Order Limits by car and instead promotes the use of a shuttle bus from local worker accommodation and car sharing to minimise additional vehicles on local roads.<br><br>The potential use of water-borne and rail transport instead of road transport for all phases of the Proposed Development has been considered. Whilst use of both alternative is possible in the supply of the Proposed Development, the final leg of deliveries during construction will be undertaken by roads set out in the study area. For example, larger equipment, such as transformers or batteries, will be transported to the Humber docks by sea (Hull, Immingham, Goole) but the final delivery will be via the strategic and local highway network as set out in **ES Appendix 13.2 oCTMP [APP-129]**. |

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| | | | PRoWs within the Site will remain open for the duration of construction period and diversions are not proposed unless required for short durations to protect public health and safety. Existing PRoWs will remain open during the operational phase of the Proposed Development and two new permissive paths will be created to improve connectivity within the Site, as well as active travel through the promotion of pedestrian and cycle access. These enhancements are set out in **ES Appendix 7.14 oLEMP [APP-116]**.<br><br>Requirements 6 (LEMP), 7 (CEMP), 8 (CTMP), 9 (OEMP), 13 (Public Rights of Way Management Plan and 18 (Permissive Paths) of the **dDCO [APP-041]** secure further details of each element.<br>The applicant will not create a significant highway impact and has considered alternatives as well as reducing car travel were practicable to do so.<br><br>Furthermore, the proposal will comply with NPSs (EN-1. EN-3 and EN-5) as well as other national energy policy set out the UK Government's aim for a secure, long term, reliable, resilient, affordable and low-cost energy supply generated in the UK whilst, at the same time, decarbonising the energy system. The UK is legally bound and committed to reducing its carbon emissions and achieving net zero by 2050, this proposal assists in meeting this legal commitment. |

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| | | | The EIA assessment criteria for traffic flows includes a threshold of 30% daily increase to vehicle flows for non-sensitive links. As such, the traffic impact during the peak construction stages is not anticipated to be severe in the context of the daily flows on the Strategic Road Network ('SRN'). |

## Table 2-7: Anglian Water

| ID | Theme | Verbatim Comment | Response |
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| RR-023/1 | Protective provisions / DCO | Anglian Water Services (AWS) is the appointed water undertaker for the main site as well as the cable route/ grid connection area. Through pre-submission discussions with the Applicant, a draft set of Protective Provisions has been included in the 'Draft Development Consent Order' Schedule 10, Part 7 For Protection of Anglian Water Services Limited (document APP-041/3.1). We welcome on-going engagement that is taking place to reach an agreed position on a final version to be included in the DCO. | The Applicant will continue positive engagement with AWS on the drafting of the protective provisions and is confident that agreement can be reached prior to the end of the Examination. The Applicant considers that the protective provisions currently being engaged will resolve all outstanding matters with AWS. |
| RR-023/2 | Protective provisions | The submission of an agreed Statement of Common Ground (SofCG) would be beneficial. If no connections or interfaces with our assets are identified or specific arrangements are needed to be put in place, then it would be helpful to log this in an SoCG. | |
| RR-023/3 | Land | Book of Reference (document APP-046/4.3) AWS's initial investigation has highlighted that the Book of Reference and associated documents is incomplete with respect to one of AWS's freehold and has not been identified which will be affected by the scheme. This relates to the Station Road Water Booster Station at Sturton le Steeple.<br>The Applicant has previously requested an LiQ for the Project to our estates team on: awsestates@savills.com and the above information was supplied.<br>AWS requests that these documents are updated as necessary to reflect an accurate account of AWS's land interests within the Project's order limits. | |

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| RR-023/4 | Protective provisions | It has been recorded in Table 8.4 on Stakeholder Engagement (APP-066/6.2.8 Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage) that the Applicant notes the need to agree appropriate easements for AW assets and that discussions are on-going in respect of this point are on-going.<br>Again, this would be helpful to record in the SofCG. | |
| RR-023/5 | Protective provisions / Assets | Interfaces between the Project and AWS assets (underground and surface assets) AWS owns and operates the water supply infrastructure within the Project order limits. In locations where the Project intersects with these assets, measures will need to be in place to ensure their protection and operational continuity of services to customers will be required, including bespoke Protective Provisions referenced above.<br>Through previous consultation stages, AWS has identified some notable assets within or in the vicinity of the order limits. There are a number of existing underground assets, including strategic supply pipelines serving water abstraction locations which are in the Project's order limits.<br>The design of the Project should minimise interaction with AWS assets/critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs. | |
| RR-023/6 | Protective provisions / Cumulative impact | Although, the ES states (Section 17.4.12, document APP-074/6.2.17 Chapter 17: Miscellaneous Issues ; Table 8.4 on Stakeholder Engagement (document APP-066/6.2.8 Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage) confirms that potable and decommissioned high pressure water lines | |

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| | | owned by AWS have been checked through a desk-top study. The Development's layout takes account of the existing infrastructure and requirements for diversions are not anticipated.<br>This only refers to pipe-line information and there and not above ground assets. See comment above regarding Station Road Water Booster Station.<br>We strongly recommend the Applicant request that AWS carry out a clash detection and technical assurance review of the scheme (a quote for this work is available on request) in relation to AW assets to confirm, for example, any sensitive plant, open cut locations, access works, diversions any above ground plant and shared access locations.<br>This ensures clarity, reduces risk, and supports the timely and efficient delivery of the Project. We would not agree that a review of utilities plans is used to inform plans for proposed works prior to construction. Given the large number of NSIPs and other AWS Projects being delivered in this Asset Management Period 8 (2025-2030), there is a strong advantage to having upfront discussions with AWS in relation to our asset interfaces with the Project.<br>Further discussion is required between AWS and the Applicant to confirm these aspects, for example, trenchless crossings, ducting, open cut locations, access works, likely diversions, any above ground plant, and shared access locations. These matters should be addressed in supporting documents and will need to be amended accordingly as these matters are agreed. | |

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| RR-023/7 | Water sources and usage | Water resources Section 8.7.5 of Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage details the likely water usage and identifies options for water sources for all stages of proposed Development.<br>This states that limited water usage will be required during the construction phase for potable and welfare use, and for construction activity uses including dust suppression and wheel washing. A peak daily demand of approximately 20m3 per day has been estimated. It is proposed that rainwater harvesting will be used, where possible, to collect rainwater for construction uses.<br>Water for potable / welfare uses and for additional construction demand (where not met via rainwater harvesting) will be provided by AWS who have advised that up to 20m3 per day is available via an existing water main.<br>AWS notes reference that additional water could be sourced via an abstraction from the River Trent / on-site watercourses or by bringing water onto Site using a bowser.<br>Information has been provided to the Applicant about regarding the process for making requests for water supply for both domestic and non-domestic purposes. This included copies of our policy position statement on water requests for non-domestic purposes for over 20m3 per day and a Water Resources Assessment to be completed.<br>Section 8.6 states the Applicant has recently undertaken a pre-planning assessment with AWS regarding water supply and any connections required. This confirms the availability of up to | |

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| | | 20m3 per day of water from an existing water main on Gainsborough Road. This assessment is valid for a period of twelve months. | |
| RR-023/8 | Water sources and usage / Fire risk | The Outline Fire Risk Management Plan (Section 3.3.6, document APP-091/6.3.4 Appendix 4.3: Outline Fire Risk Management Plan) covers water sources and requirements for firefighting purposes. This could potentially be achieved through an existing hydrant located approximately 1 km from site or provision of a piped hydrant, sourcing the water from the existing water main running alongside Gainsborough Road. While an existing hydrant or a proposed piped hydrant solution is considered a potential option, further assessment would be needed to confirm if the required water supply could be achieved through this approach. Should the assessment determine that these solutions would not be viable, provision has been made for potential water tank locations.<br>We welcome confirmation that the Surface Water Drainage Strategy, confirms rainwater harvesting systems to be utilised during both the construction and post-construction phases, to provide a source of non-potable water, ensuring resource efficiency for the Project (Section 5.1.4, document APP-120/6.3.8 Appendix 8.2 Surface Water Drainage Strategy).<br>It would be helpful if the position on the need for potable water (domestic and non-domestic purposes) for the different stages of the Project could be confirmed in the SofCG. | |
| RR-023/9 | General | Framework management plan documents APP-089/6.3.4 Appendix 4.1 Outline Construction Environmental Management | |

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| | | Plan (OCEMP) APP-129/6.3.13 Appendix 13.2 Outline Construction Traffic Management Plan.<br>AWS notes the submission of these framework documents and welcomes the specific references to how the interfaces with utility assets such as mains pipes within the order limits will be managed through the construction of haul roads, bellmouths. | |
| RR-023/10 | Protective provisions | Table 3.14: Utilities, Telecommunications and Television Receptors in the OCEMP refers to undertaking consultation and agreement of construction/ demobilisation methods will be undertaken prior to works commencing which would be covered by Protective Provisions in the DCO. This also refers to the Applicant contacting AWS to agree the stand-off distances where it is likely that works will be undertaken within 7 metres of pipes in excess of 400mm in diameter to ensures apparatus is suitably protected. | |
| RR-023/11 | General | Table 3.4: Hydrology, Flood Risk and Drainage of the OCEMP, refers to construction site runoff which could be treated on-site or discharged to the nearest public sewer. AWS is identified here as the sewerage undertaker and should be amended to refer to relevant undertaker. | |
| RR-023/12 | Cable route / Construction | Section 11.6 of the OCTMP refers to the cable route construction will need to be coordinated to avoid overlap with other utilities and minimise highway disruption.<br>Sections 10.4 and 10.5 of the OCTMP states "…it is anticipated that the entire cable route will remain within the internal boundaries of the site, allowing the use of a conventional trench and duct installation method. As a result, minimal to no impact | |

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| | | to the operation of public highways is expected. There will be some horizonal directional drilling (HDD) when required, for example for crossing utilities and the quarry access. The exact cable route will be determined at a later stage. The exact location of the cable route within carriageway and verges will be identified by the contractor who will produce a cable route feasibility report prior to commencement." | |
| RR-023/13 | Protective provisions / General / Assets | For the reasons set out above under our comments 'Interfaces between the Project and AWS assets (underground and surface assets)', whilst Protective Provisions should address those interfaces with our assets, AWS would welcome further early discussion with the Applicant regarding such matters and their inclusion in the final versions of these documents.<br>These documents should also include steps to remove the risk of damage to AWS assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings.<br>AWS would also seek to ensure that 24 hours /7-day access to our assets is not compromised and therefore would welcome further discussion with the Applicant regarding such matters and their inclusion in the finalised documents. | |

## Table 2-8: Cadent Gas

| ID | Theme | Verbatim Comment | Response |
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| RR-023/1 | Protective provisions / DCO | Representation on behalf of Cadent Gas Limited (Cadent) to the Steeple Renewables Project Development Consent Order (DCO). Cadent is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, Central, East Anglian and North West England.<br>Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient, and coordinated way. Cadent wishes to make a relevant representation to the proposed DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted.<br><br>The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent has gas pipelines and associated apparatus located within the order limits which are | The Applicant is negotiating protective provisions with Cadent to ensure that its statutory undertaking is not subject to serious detriment as a result of the Proposed Development. Draft protective provisions are included in **Draft Development Consent Order [APP-041]).** It is not anticipated that any diversions of Cadent's apparatus would be required to facilitate the Proposed Development.<br><br>The Applicant notes Cadent's comments on future representations and will update the draft protective provisions as and when needed through the ongoing negotiations. The Applicant is confident that agreement can be reached with Cadent prior to the close of the Examination. |

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| | | affected by works proposed, the extent to which is still being assessed and which may require diversions subject to the impact. Any proposed diversions have not yet reached detailed design stage and so the positioning, land rights and consents required for these gas diversions are not confirmed.<br><br>At this stage, Cadent is not satisfied that the DCO includes all land and rights required to accommodate such diversions as design studies will need to influence these requirements. Cadent will not decommission its existing apparatus and/or commission new apparatus until it has sufficient land and rights in land (to its satisfaction) to do so, whether pursuant to the DCO or otherwise. This is a fundamental matter of health and safety.<br><br>At this stage, Cadent is not satisfied that the tests under section 127 of the Planning Act 2008 can be met. Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations. As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Whilst the draft DCO includes a form of protective provisions for Cadent's benefit, adequate protective provisions for the protection of Cadent's statutory undertaking | |

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| | | have not yet been agreed but are in discussion between parties. Protective provisions for the benefit of Cadent's statutory undertakings have been included in a number of recently made DCOs, including The Viking CCS Carbon Dioxide Pipeline Order 2025 which came into force on 1 May 2025 and The Oaklands Farm Solar Park Order 2025 which came into force on 11 July 2025, and Cadent's preferred form of protective provisions for inclusion within the DCO are included at Appendix 1.<br><br>Cadent wishes to reserve the right to make further representations as part of the examination process but will seek to engage with the promoter to reach a satisfactory agreement. Cadent has made positive progress with the promoter but has not yet reached satisfactory agreement. Cadent will keep the examining authority updated in this regard. | |

## Table 2-9: EDF

| ID | Theme | Verbatim Comment | Response |
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| RR-053/1 | Project interactions / CAq | This relevant representation is submitted on behalf of EDF Energy (Thermal Generation) Limited ("EDF") requesting that EDF is treated as an Interested Party for the Examination of the DCO application for the Steeple Renewables Project (PINS reference EN010163) (the "Project").<br><br>EDF owns West Burton A Power Station, a closed coal-fired power station in close proximity to the proposed Order Limits, through which part of the proposed cable corridor of the Project will run. The station ceased generating in March 2023 and EDF has responsibility for the safe decommissioning and demolition of the power station assets, which is expected to continue until 2028. West Burton A Power Station houses critical third-party live infrastructure, including those of West Burton B CCGT Power Station which remains operational.<br><br>While EDF is, in principle, supportive of the Project, it has concerns regarding the interface between the Project and West Burton A Power Station which require to be resolved. The Book of Reference ("BoR") identifies plots 05/05, 05/06, 05/07, 05/10, 05/11, 05/12, 05/16, 05/17 and 05/19 (the "EDF Plots") as land owned by EDF over which compulsory acquisition powers to permanently acquire new rights are sought. To safeguard EDF's interests, the safety and integrity of current operations, the ongoing decommissioning, and potential future development, | The Applicant notes the comments made by EDF in relation to the protection of their apparatus and their statutory undertaking. The Applicant is in continuing discussions with EDF regarding a bespoke set of protective provisions to be included in the DCO for the protection of EDF. The Applicant considers that progress on the protective provisions is well advanced and that agreement will be reached during examination. |

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| | | EDF objects to the inclusion of the EDF Plots in the DCO and the compulsory powers in respect of such plots. | |
| RR-053/2 | Maintenance | EDF will require appropriate protection to ensure that the Project does not jeopardise continuing or future operations or site decommissioning and demolition. EDF's rights of access to inspect, maintain, renew and repair such infrastructure must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. | |
| RR-053/3 | General | There is existing third-party critical infrastructure on the site (two Exolum Oil Pipelines, the West Burton B Gas Pipeline, numerous 132kV and 400kV cables, underground and overground cables owned by National Grid and potable water supplies owned by Severn Trent Water). Any infrastructure or operations associated with the Project must protect this third-party infrastructure and be undertaken in full compliance with the terms of existing legal agreements and obligations. | |
| RR-053/4 | STEP | The West Burton A site has also been selected by the UK Atomic Energy Authority for the development of the UK's first Nuclear Fusion Plant, with the potential to yield significant quantities of low carbon energy, generate employment opportunities and encourage investment in the region. EDF wish to facilitate the implementation of this project and other potential future development opportunities at the site. It is therefore imperative that the proposed cable route for the Project does not sterilise development land or detract from future development plans.<br><br>EDF will require protective provisions to be included within the | |

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| | | draft DCO for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety, decommissioning and third-party obligations. These protective provisions are included at Appendix 1 of this submission, noting that these have been included on the face of other development consent orders granted in the vicinity of West Burton A Power Station (namely the West Burton Solar Farm Order 2025) where cable connections across EDF land were required.<br><br>EDF is liaising with the Promoter in relation to the proposed route and such protective provisions, along with any supplementary agreements which may be required. EDF reserves the right to make further representations as part of the Examination process but in the meantime will continue to liaise with the Promoter with a view to reaching a satisfactory agreement | |

## Table 2-10: Exolum

| ID | Theme | Verbatim Comment | Response |
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| RR-013/1 | Project interactions | This response is submitted on behalf of Exolum Pipeline System Limited. We can confirm that our client's apparatus has been identified as being either within or in close proximity to the proposed scheme. We must therefore respond for the following key reasons:<br>• The scheme has the potential to contravene Exolum's ability to Safely access and maintain its assets under their legal rights as set out in Part IV of The Energy Act 2013, and;<br>• Due to the potential for breach(s) of the Health & Safety at Work Act 1974 with specific concerns around Regulation 15 of the Pipeline Safety Regulations 1996 and the potential for any subsequent work close to the High-Pressure Pipeline to impact both the Safety of the pipeline and those doing the work. | The Applicant notes this comment and confirms that it will adhere to the HSE: Land use planning methodology and therefore permission for any works within the consultation zones relating to Major Accident Hazard Pipelines will be obtained from the operator, in this case Exolum. |
| RR-013/2 | General | We note at this specific stage: 1. Exolum's external solicitors VWV are negotiating Protective Provisions with Steeple Renewable's solicitors.<br>Exolum requires protective provisions to be included within the Development Consent Order (DCO), if granted, to ensure that its apparatus is adequately protected and can continue to operate safely.<br>Exolum and their appointed representatives are liaising and will continue to liaise with the Applicant regarding such bespoke | The Applicant notes the comments made by Exolum in relation to the protection of their apparatus and their statutory undertaking. The Applicant is in continuing discussions with Exolum regarding a bespoke set of protective provisions to be included in the DCO for the protection of Exolum. The Applicant considers that progress on the protective provisions is well advanced and that agreement will be reached during examination |

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| | | protective provisions with a view to concluding the necessary agreements as soon as possible.<br><br>It is critical that all Construction and Design work affecting a High-Pressure Pipeline is discussed and agreed with Exolum. Our client must therefore be consulted to ensure the proposal has no impact on their apparatus. Their contact details are:<br>Exolum Central Services Ashdon Road Saffron Walden Essex CB10 2NF; Email: pipelinerow@exolum.com Tel: 01799 564101 | |

## Table 2-11: The Environment Agency

| ID | Theme | Verbatim Comment | Response |
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| RR-025/1 | Flood Risk | Our key issues are identified below and our detailed issues can be found in Appendix 1. Summary of the Environment Agency position 1. Flood Risk Further work is required to demonstrate a full understanding of the following aspects of flood risk: • Consideration of the flood risk impacts of any structures on site beyond 2069, which is the end of the operational lifetime of the development. • Further clarity is sought regarding the impacts of, and resilience to, an extreme flood event, arising from a breach in the River Trent defences. • Further clarity is required regarding the assessment of flood risk from ordinary watercourses. | The Applicant notes this comment. Detailed responses are provided below with respect to the individual issues raised. |
| RR-025/2 | Ecology and Fisheries | Aquatic habitats and species are not mentioned in the Decommissioning Plan. | **ES Appendix 4.2 oDP [ APP-090]** can be updated as part of the Examination process.<br><br>There are currently no proposals to undertake any work in waterways or aquatic habitats as part of the decommissioning phase. However, it is recognised that standard measures will still be needed to guard against incidental pollution of watercourses, and these have been described in the **ES Appendix 4.2 oDP [APP-090]**. All culverts that were created/replaced or ponds that were enhanced/created during construction will be left *in situ*. |
| RR-025/3 | Groundwater and Contaminated Land | The Conceptual Site Model (CSM) is inadequate, and not all sources of contamination have been assessed.<br>• The ground investigation recommendations for the assessment of potential contaminants includes soil testing but should also include groundwater testing. | The Applicant does not consider the need for groundwater sampling on the farmland areas as it has a low overall risk of containing contaminants at significant concentrations that could affect the development in these areas. The desk study report sections 5.1 and 5.4 will be amended to make reference to |

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| | | • Further clarity and consistency throughout all submission documents is required regarding the mitigation measures for unexpected contamination.<br>• There is a lack of clarity and consistency between documents regarding the firefighting strategy and the need for firewater containment measures.<br>• There are some outstanding issues regarding the management of surface water drainage, and associated pollution control measures. | sampling groundwater locally where potentially mobile and/or leachable soil contaminants are proven, and if groundwater contaminants are found at significant concentrations, then sampling for analysis of nearby surface water courses should also take place.<br><br>The Applicant accepts the EA's comments that use of firewater cannot be ruled out and will update the Outline Fire Risk Management Plan along with associated drawings to reflect a commitment to accommodate use of water for firefighting purposes on site.<br>**ES Appendix 8.2 Surface Water Drainage Strategy [APP-120]** demonstrates that runoff rates will not be increased as a result of the Proposed Development and takes into account extreme (1 in 100 year) events as well as the permeability of the soils.<br><br>Pollution control measures, as specified within the **ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089]**, will ensure there is no significant risk of contamination of surface water. |
| RR-025/4 | Water Quality | Further detail is required in the Outline Construction Environmental Management Plan (oCEMP) to ensure the detailed CEMP(s) adequately mitigate environmental risk. | The Applicant notes the comment but it is not clear what additional information the Environment Agency (EA) are seeking to be included in **ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089]**. The Applicant is committed to continuing to engage with the Environment Agency to resolve this matter. Both parties are engaging in a Statement of Common Ground (SoCG). A CEMP is |

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| | | | secured by Requirement 7 of the **dDCO [APP-041]** building on details secured in the oCEMP and the Environment Agency are identified in the requirement to be consulted on the CEMP. |
| RR-025/5 | Flood Risk | Climate change impacts on fluvial flood risk have been assessed for the 2050's epoch using the 'Higher Central' allowance. This is based on an operational lifetime of the development of 40 years, ceasing prior to the end of 2069. Impact Flood risk has only been assessed and mitigated to 2069 and not beyond. This does not allow any flexibility for operation further than 2069. Solution The DCO must specify that operation of the site will cease by the end of 2069 in accordance with the Flood Risk Assessment. | This proposed development is temporary with Requirement 1 in the **dDCO [APP-041]** limiting commencement to a 5-year period beginning with the date the Steeple DCO comes into force (specific date not known at this stage) and Requirement 21 in the **dDCO [APP-041]** restricting development to a 40-year (temporary) period. It is not possible to specify a specific end date due to the fact it is not known at this stage when the Steeple DCO will come into force nor when development will specifically begin. However, the current grid connection date is October 2029 and the Scheme must be operational by this date to ensure that its connection agreement with National Grid is met. This means that prior to October 2029, the final commissioning of the first phase of Work No 1 would have to have occurred. This is the trigger point for the 40 years. This means the timeframe of the Flood Risk Assessment (FRA) ending in 2069 remains appropriate. There is no need to specifically limit the operation of the proposed development to the FRA. The FRA has been limited to the period in which the development will be in situ. The DCO does not offer flexibility as to the 40 years of temporary operation. Therefore, there is no need for the FRA to have an extended period. This is reflected in **ES Appendix 8.1 FRA [ APP-117 to APP-119]**. |
| RR-025/6 | Flood Risk | FR02 APP-117 Appendix 8.1: Flood Risk Assessment Section 8.1.1 Issue the FRA does not include any consideration of flood risk | Decommissioning would involve the removal of all PV modules, mounting poles, energy storage equipment, invertors, |

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| | | arising from infrastructure remaining in place beyond the end of 2069. Impact Any infrastructure no longer operational but not yet decommissioned may have impacts on the flood extent into the 2080's climate change epoch. Solution The FRA should include an assessment of the 1 in 100 year + 39% flood extent for any infrastructure remaining beyond the end of 2069, including the decommissioning phase. Include any mitigation measures as required. | transformers etc and is expected to take approximately 12 months. The 1 in 100 year plus 39% fluvial flood extent for the River Trent is shown in **Figure 5.3 of ES Appendix 8.1 FRA [APP-117 to APP-1198]**. It occupies the eastern portion of the site (approximately 10% of the total site area). The infrastructure within this area will comprise solar panels and invertors only. No land raising is proposed in this area. In the event of a 1 in 100 year plus 39% climate change flood occurring during the 12 month period of decommissioning work, the displacement of floodwater by equipment that has not yet been removed from the site will be negligible given the very small footprint of the invertors and the solar panel supports and the shallow flood depths anticipated (the 1 in 100 year plus 39% climate change flood level is 4.35m AOD, with the lowest level at which above ground infrastructure is proposed at 3.5m AOD).<br><br>It is noted that the 1 in 100 year plus 39% climate change event is applicable for the 2080s epoch which comprises the period 2070 to 2125. The decommissioning work will take place in the first year of this 50-year epoch. Although the 39% climate change allowance is applicable for the whole epoch, it is not realistic to expect a sudden jump from the 23% climate change allowance in 2069 to 39% in 2070, rather it would increase gradually over the epoch to a maximum of 39% towards the end of the 50-year period. Use of this 39% climate change is therefore considered conservative for the one-year decommissioning period in the first year of the epoch. Additionally, the equipment will be |

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| | | | removed throughout the year decommissioning period, so should a flood event occur at some point during the year, it is probable that at least some, if not all, of the equipment within the 100 year plus 39% climate change extent would have already been removed. The FRA can be updated to include this assessment of decommissioning stage impacts.<br><br>As stated in the FRA, a Flood Management Plan would be in place during decommissioning works to ensure appropriate actions can be taken ahead of any predicted flooding.<br>This approach is in accordance with the National Policy Statements (particularly paragraphs 4.10. 11 and 4.10.12 of NPS EN-1 with regards climate change and climate change scenarios) and advice from the EA, where an assessment of the risk associated with various flooding sources is required along with consideration of the effects of climate change over the design life of the development (in this case to be limited by the Order to 40 years). The EA's most recent climate change guidance, published in May 2022, has been used by the **FRA [APP-178]**. |
| RR-025/7 | Flood Risk | FR03 APP-117 Appendix 8.1: Flood Risk Assessment Section 9.3 Issue In an extreme flood event, such as a breach of the River Trent defences, shutdown of the site may be required rapidly and at short notice. No site shutdown process has been provided. Impact Risk of rapid onset flooding affecting site operation. Solution A site shutdown process, including appropriate flood risk triggers, should be set out within the FRA or other suitable documents. | The Applicant notes this comment. Flood Risk Management is covered in **ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089]**, **ES Appendix 4.4 outline Operational Environmental Management Plan (oOEMP) [EN010163/APP/6.3.4APP-092]** and **ES Appendix 4.3 outline Decommissioning Plan (oDP) [APP-090]**. Detailed versions of each plan are secured via **dDCO [APP-041EN010163/APP/3]** requirements (7, 9 and 21). Flood |

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| | | | Risk Management is also a specific requirement listed in requirement 7. It is noted that during the design 1 in 100 year plus climate change flood event from the River Trent, none of the infrastructure is impacted and access routes remain unaffected. The Applicant is committed to continuing to engage with the Environment Agency to resolve this matter. Both parties are engaging in a Statement of Common Ground (SoCG). The oCEMP, oOEMP and oDP can be updated during the Examination should this be necessary. |
| RR-025/8 | Flood Risk | FR04 APP-117: Appendix 8.1: Flood Risk Assessment. Section 7.2.5-page 52 Issue Recoverability and resilience of critical infrastructure in the event of a breach of Trent defences is unclear Impact Elements of the site could receive significant damage and pose hazards to others during a breach scenario Solution Please clarify how resilient or recoverable critical elements of the site would be during a breach. Additional narrative This section notes that equipment has not been raised above the breach flood level as this would not be viable given the worst-case depths involved. It is appreciated that breach depths are significant. In the unlikely event that a breach was to occur how recoverable is the infrastructure within the site. For example, could panels be inundated and still work once flood waters receded? Furthermore, how resilient is the BESS and grid connection infrastructure if they were inundated, could this pose additional hazards to those in the vicinity of these elements if they were inundated during a breach scenario? | **ES Appendix 8.1 FRA [APP-117 to APP-119]** confirms a worst-case breach event could affect the majority of the eastern parcel resulting in up to 3.83m depth of flooding to the solar arrays and up to 1.3m depth within the BESS area (the breach would not affect the substation). This is a residual risk only; as agreed with the EA previously (EA Scoping Opinion 6th August 2024), this is not a 'design' event and only requires consideration in terms of resilience of the facility. The FRA sets out during a breach event the operation would be shut down remotely with no hazard to others. The Applicant accepts that any damaged equipment would need to be repaired / replaced following a breach flood event. There would be no hazard to those in the vicinity of the panels / BESS / grid connection if they were inundated during a breach scenario, as they would have been shut down remotely well in advance of floodwaters reaching this infrastructure. |

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| RR-025/9 | Flood Risk | FR05 APP-119 Appendix G Hydraulic Assessment of Ordinary Watercourses. April 2025 Issue It is unclear what scenario the maximum water level results presented on the cross sections in Appendix E relate to Impact Flood Risk could be misinterpreted Solution Please make it clear on the cross sections in Appendix E what scenario the maximum water levels represent. It is presumed that this is the design flood event. | The maximum water levels represent the design flood event, and **ES Appendix 8.1 FRA [EN010163/APP/6.3.8 APP-117 to APP-119]** will be updated with this clarification as part of the Examination process. |
| RR-025/10 | Flood Risk | FR06 APP-119 Appendix G Hydraulic Assessment of Ordinary Watercourses. April 2025 Issue The available freeboard shown in the 1d modelling for some cross sections of the Catchwater Drain is limited and it is not clear whether structures have been included in the modelling Impact Flood risk to critical elements such as the BESS and BESS attenuation pond on the left bank floodplain of the Catchwater Drain could be underestimated. Solution Please consider the sensitivity of model results to changes in roughness, design flows, and missing structures on the Catchwater Drain. It is important that the uncertainties of model results in the vicinity of the BESS and BESS attenuation pond are presented so that the implications for the development design and resilience can be properly understood. Please see the additional narrative section below for further information. Additional narrative 1d modelling has been developed to assess flood risk from the Ordinary Watercourses which cross the site. This is welcomed, but it is unclear whether any structures been included within this modelling. An area of key interest is the Catchwater Drain in the vicinity of the BESS and associated attenuation pond (Catchwater drain cross sections 7 to 11). In | The Hydraulic Model – **Appendix G of ES Appendix 8.1 FRA [EN010163/APP/6.3.8 APP-117 to APP-119]** is in the process of being updated for the Catchwater Drain to include structures and with additional model runs to test the sensitivity of the model results. These will be presented to the EA as part of the Examination process. |

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| | | some locations, for example at Catchwater Drain Cross section 7, 8, and 9 there is limited freeboard in the design flood event between the maximum water level and the left bank elevation. How sensitive are the model results in these locations to changes in design flows and the adopted Mannings roughness values? This is particularly important to consider as the In the Risk of Flooding from Rivers and Sea dataset the BESS attenuation basin appears to be within an area of medium to high fluvial flood risk and the BESS itself is just outside of the area of medium to high risk. If the BESS attenuation basin floods from fluvial flood risk sources this could limit the available storage from surface water runoff from the BESS area. | |
| RR-025/11 | Ecology and Fisheries | EF1 APP-065 Ch 7 Ecology and Biodiversity, 7.8.11 APP-090 Appendix 4.2 Outline Decommissioning Plan Table 3.1 Issue Aquatic habitat / species is not mentioned in the Decommissioning Plan (DP). We do not agree with the statement in ES Ch 7 that no further physical impacts on watercourses would be likely to arise during the decommissioning phase. Impact There is a risk of disturbance during the decommissioning phase to the aquatic habitat / species that have become established (and potentially improved) since construction. Solution Amend wording in Table 3.1 of DP to include consideration of aquatic species and habitats. Update wording in ES Ch.7 to reflect that impacts on watercourse crossings will be covered in the Decommissioning Plan. EF2 APP-089 oCEMP, Table 3.3. Fish and aquatic invertebrates Advice Where any over-pumping of a watercourse will be | As outlined above, no changes to waterways or aquatic habitat are anticipated as part of decommissioning (i.e. the aquatic features installed/created during construction will remain throughout decommissioning). Provisions relating to indirect effects (such as pollution control, habitat avoidance) are included in the **ES Appendix 4.2 oDP [APP-090]**, and no further measures specific to aquatic habitats are considered likely to be necessary.<br><br>**Table 3.3** from the **oCEMP [APP-089]** confirms direct impacts to watercourse and wet ditch habitats have been avoided in most cases. No new culverts will be installed on watercourses that are likely to support fish or notable aquatic invertebrates; where required across suitable watercourse, crossings will be clear-span bridges. |

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| | | required (e.g. culvert removal) there is a risk of fish and eel of entrapment into pumps. During over-pumping, the inlet of pumps must be screened to ensure that eel and fish are not entrained. Under the Eel (England and Wales) Regulations 2009, Best Achievable Eel Protection (BAEP) for screen aperture size is 2mm. | Where existing culverts are to be removed from watercourses likely to support fish (which are to be replaced by clear-span bridges) and new clear-span bridges are installed, sensitive working methods will be adopted. This will include timing of works to avoid key spawning and migration periods where possible and fish rescue and relocation to take place, supervised by an Ecological Clerk of Works (ECoW).<br><br>The ECoW required to oversee activities which would impact suitable watercourse habitats.<br><br>The Environmental Manager will oversee implementation of mitigation measures and undertake regular checks to monitor compliance, which will be recorded in a logbook. Specific responsibilities will be confirmed in the final CEMP.<br><br>Regarding Table 3.3 from the **oCEMP [-089]** revisions will be picked up as part of the detailed CEMP secured via **dDCO [APP-041]** requirement 7 to include consideration of Best Achievable Eel Protection measures. The Environment Agency are identified in Requirement 7 to be consulted on the detailed CEMP. |
| RR-025/12 | Ecology and Biodiversity | EF3 APP-065 Ch 7: Ecology and Biodiversity 7.2.1 Issue Omission- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 is not listed, although we note it is included in APP-103 Appendix 7.1 Legislation and Policy. Impact | Due to the number of statutory instruments associated with Biodiversity Gain, and the fact that the regulations only apply to Town and Country Planning Act 1990 developments at this time (i.e. these regulations do not translate to NSIP projects), the 2024 |

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| | | Inconsistency between reports. . Risk of not considering new environmental definitions in legislation in respect of BNG, such as 'irreplaceable habitat', along with related offences to said habitats. Solution Include reference to Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 in ES Chapter 7 for completeness and ensure proposals meet the requirements of this legislation. | regulations have not been specifically listed in **ES Chapter 7: Ecology and Biodiversity [APP-065]**. However, in anticipation of similar definitions for 'irreplaceable habitats' being defined for the Planning Act amendments in future, the definitions outlined in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 have been considered – please refer to paragraphs 4.30 to 4.33 of **ES Appendix 7.12 - Biodiversity Net Gain Report [APP-114]** which described how veteran trees have been considered within the biodiversity gain assessment. |
| RR-025/13 | Ecology and Biodiversity | EF4 APP-111 Appendix 7.9: Otter and water vole report Issue It is not possible to accurately review the content of this report as it has been significantly redacted. Impact Unable to assess the conclusions of APP-065 ES (Chapter 7 - Ecology and Biodiversity) with regard to otter and water vole, although we note that the site has been evaluated on a precautionary basis as important at the Local level for otters and Site level for watervole. Solution Provide full report to the EA. | The Applicant has provided an unredacted copy of the Otter and Water Vole Report to the Environment Agency. |
| RR-025/14 | Outline Construction Environmental Management Plan | EF5 APP-089 Appendix 4.1 Outline Construction Environmental Management Plan Table 3.3 Ecology Issue Further clarity required regarding mitigation measures for otter and water vole. Impact Compounds and trenches associated with cable installation present a risk of entrapment of mammals, such as otters. Solution Under the mitigation measures for otters, include specific mention of covering open trenches to prevent wildlife from falling in overnight, and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction. | Outline measures for protecting mammals from entrapment during construction are included under the badger section of **ES Appendix 4.1 oCEMP [APP-089]** (see text: "*During construction, deep excavations will be covered or provided with an appropriate means of escape for mammals to ensure that any badgers or other mammals do not become trapped in excavations overnight*") and will be elaborated on and it will be made clear that these measures relate to otters, water voles, and other mammals also. Table 3.3 of **ES Appendix 4.1 oCEMP [APP-089]** will be updated as part the detailed CEMP secured via **dDCO [APP-041]** |

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| | | | requirement 7. The Environment Agency are identified in Requirement 7 to be consulted on the detailed CEMP to cross reference the measures under the provisions listed for otters. |
| RR-025/15 | Ecology and Biodiversity | Geomorphology GEO1 APP-036 2.31 Indicative Water Crossing Detail APP-065 Chapter 7 - Ecology and Biodiversity – sections 7.8.51 Advice We advise that pipe (and box) culverts can interfere with water conveyance, sediment transport and the movement of fish and mammals. Installation of these types of culverts can destroy natural channel bedforms and reduce integrity of the bank structure, possibly requiring bank reinforcement and in-channel scour protection. We recommend that the use of Pipe (and box) culverts should be avoided where possible, arched/3-sided/portal culverts should be considered as alternatives, with open span crossings being the most preferred. Where existing crossings are to be upgraded/replaced consideration should be given to improving the crossing type rather than replacing like-with-like. | The Applicant intends to improve the crossing type where possible. This is evidenced by the commitment to ensure crossings over flowing watercourses are clear-span bridges (including the removal of two culvert pipes to replace with clear-span vehicle bridges). All other proposed crossings are on ditches that have slow to no flow or dry out for much of the year, as observed by the project ecologist team during condition assessments and riparian mammal surveys, and therefore have a reduced risk of scour and impinging the movement of animals. |
| RR-025/16 | Water and Flood Risk | GEO2 APP120 Appendix 8.2: Surface Water Drainage Strategy – Appendix B Topographic Survey Issue The topographic maps are difficult to interpret because the contours are not labelled or shaded and the spot height text is too small Impact Cannot interpret topography easily without zooming in significantly to see spot heights which is not a practical solution when inspecting larger areas. Solution Label major contours and/or use shading to express topography graphically | Appendix B Topographic Survey of the **ES Appendix 8.2 Surface Water Drainage Strategy (SWDS) [APP-120]** will be revised as part of detailed surface water drainage details secured via **dDCO [APP-041]** requirement 16. |

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| RR-025/17 | Groundwater and Contaminated Land | GWCL1 APP-055 Consultation Report Appendices Part H APP-082 Environmental Statement Appendix 2.2 Phase 1 Geoenvironmental Desk Study Report Issue Not all sources of contamination have been assessed and the Conceptual Site Model (CSM) is not sufficient. Impact We do not agree with the conclusions of the conceptual site model (CSM) presented in the Phase 1 Geoenvironmental Desk Study Report. Risks to groundwater are overlooked in recommendations. Solution Review our previous comments (ref D1 in EA PEIR response) and the additional narrative provided below, and update the desk study as appropriate. Additional explanation We are pleased to note that the desk study has been updated to address some EA comments raised in our response to the PEIR (rev.1 or rev.2, dated April 2025). However, we are still not satisfied that the report uses all relevant information in the data search, and that the CSM is appropriate for the risks identified.<br>The potential for soil and groundwater contamination associated with West Burton Power Station cannot be ruled out without further investigation. Based on the evidence presented, we consider this to be at least a Moderate risk (currently given as Low). Remediation or mitigation may be required.<br>Numerous records of historical tanks both on- and off-site are noted in the Groundsure reports. These are not mentioned in the desk study. Some of these could be sources of contamination and should be in the CSM.<br>There are numerous records of sludge storage on site. There could be contaminants associated with this including PFAS, | The Applicant agrees that the West Burton Power station area, which is proposed for the 400kv cable works use only, should be subject to a more detailed ground investigation targeting the contaminants listed along the lines of the proposed cabling routes over former historical features such as the 2 recorded on site tanks which are both within the power station area.<br><br>In the Concept Site Model (CSM), the development risk to end users for the power station area only could be increased to Moderate, but the Applicant strongly believes that the risk for the site as a whole should remain as Low. It is therefore proposed to include a sub-section in the CSM to address contaminant risks in the power station area only as part of the Examination process.<br>**ES Appendix 2.2 Phase 1 Geoenvironmental Desk Study Report [APP-082] notes** numerous Exemptions for storage of sludge on farms. Exemptions are held by the farms and are issued by the EA and are assumed to be for the temporary storage for the permitted use of sewage sludge on agricultural land.<br><br>Whilst domestic and mixed commercial sewage sludge can contain contaminants which could include PFAS, as permitted for use in agriculture for the purpose of growing food, the Applicant does not consider that these potential contaminants would be at such a concentration in the soils to prevent the development of a solar PV farm, with a BESS and cabling routes, where assessing the contamination testing results against |

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| | | pesticides and herbicides. Appendix E (contaminants of potential concern) does not list these as associated with farming, but we consider it should. Note that DoE profiles were written before PFAS was understood to be a concern, and these should now be considered. | 'Industrial/Commercial' end use criteria. Topsoil and subsoil that is to be removed or stripped to allow any development should be tested for contaminant suites to ensure its safe re-use on site or to allow export off-site to a soil recycling facility or to another farm or development site under relevant Waste Exemptions, or Material Management Plans. We will reflect the possible presence of PFAS compounds in the updated CSM. |
| RR-025/18 | Consultation Report | APP-055 5.1.1 Consultation Report Appendices Part H, Item 136 partially addresses our comment D14. We previously noted that construction of the power station within the site boundary is not noted in the table in Section 3.1 (either on- or off-site), or the discussion of where Made Ground might be expected in Section 3.2. The Executive Summary still states the power station was constructed in the 1960s but this information is not repeated or expanded upon in the main report; the summary should not have new information. This information has still not been added. The power station is a significant source of potential contamination. | The Applicant disagrees with most of this comment. The Executive Summary of the **Consultation Report [APP-047]** does not reference West Burton Power Station was constructed in the 1960's. This is, however, included in the Executive Summary of **ES Appendix 2.2 Phase 1 Geoenvironmental Desk Study [APP-082]** with further details about West Burton power Station provided throughout the document. Table in Section 3.1 and 3.2 of **ES Appendix 2.2 Phase 1 Geoenvironmental Desk Study [APP-082]** can be revised as part of the Examination process to include construction of West Burton Power Station in the 1960's and where made ground might be expected. |
| RR-025/19 | Geoenvironmental Desk Study Report | GWCL2 APP-082 Environmental Statement Appendix 2.2 Phase 1 Geoenvironmental Desk Study Report, sections 5.1 and 5.4 APP-089 Appendix 4.1 Outline Construction Environmental Management Plan, Table 3.11 APP-041 Draft Development Consent Order, Schedule 2 Part 1 Requirement 12<br>Issue The recommendations for the assessment of potential contaminants of concern only cover soil testing should also include groundwater, and this omission has been carried | The Applicant notes this comment but disagrees that Groundwater sampling is required at this stage. **ES Appendix 2.2 Phase 1 Geoenvironmental Desk Study [APP-082]** sets out there are no pathways and assessed low risk of contaminant linkages for ground water. Specifically, no significant contaminants are anticipated on site as limited made ground is expected. Therefore, no mitigation is anticipated. Furthermore, receptors are too far from potential low risk contamination |

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| | | forward into the main report and draft DCO. Impact Any contamination in groundwater may be missed if no testing is undertaken.<br><br>Solution Include provision for chemical testing of groundwater for common contaminants of potential concern, and also for any specific chemicals identified as potentially present in the desk study and soil sampling. Ensure this is updated in the ES, CEMP and DCO. | sources to be affected. Surface water from construction works will be controlled and no mitigation is anticipated.<br><br>A ground investigation will be required prior to development to assist in terms of engineering design. Requirement 7 sets out that the CEMP must include a protocol requiring consultation with the Environment Agency in the event that unexpected, contaminated land is identified during ground investigation or construction. However, as the site is deemed as being of low overall risk of having significant contamination, it is not considered necessary to undertake the ground investigation prior to grant of the DCO.<br><br>Other recommended assessment works include phased ground investigation prior to development; intrusive ground investigation to depths of the order of 5m with in-situ testing; trial pitting for in situ testing, sampling and rock mass assessment; infiltration testing; geotechnical laboratory testing; chemical laboratory testing of soils; factual and interpretive reports providing recommendations for remedial actions. Water sampling, if necessary, would be identified as part of these further assessments.<br><br>Requirement 12 of the **dDCO (APP-041]** also secures a contamination risk assessment to be approved by the local planning authority in consultation with the Environment Agency. |

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| RR-025/20 | Outline Construction Environmental Management Plan | GWCL3 APP-089 Appendix 4.1 Outline Construction Environmental Management Plan: Table 3.4 Discharge/ Disposal of site runoff and Table 3.11 Ground Conditions Issue The mitigation measure for unexpected contamination is currently insufficient in Table 3.4. Procedure in Table 3.11 is given twice, but the entries are slightly different from each other. Impact Site workers may not identify the appropriate procedure. If not followed correctly there is a potential risk to sensitive receptors, potential for breach of construction commitments, and potential for delays and additional costs. Solution Review Table 3.11 and consolidate the two bullet points: • "A 'Discovery Strategy' protocol will be drawn upon to ensure that any contamination identified during construction is assessed…" and • "Should any potentially contaminated ground, including isolated 'hotspots' of contamination…"<br><br>Replace the text in Table 3.4 with the consolidated version from Table 3.11.<br><br>We look forward to reviewing further detail in the individual CEMP(s). We recommend the full protocol is established early to ensure consistency for all phases of work. Additional explanation To ensure consistency the revised text should also be used in: APP-090 6.3.4 Appendix 4.2 Outline Decommissioning Plan APP-092 6.3.4 Appendix 4.4 Outline Operational Management Plan While ground works during the operational phase is expected to be minimal, it is possible that excavation during routine | Table 3.4 and Table 3.11 of **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089]** regarding mitigation measures for unexpected contamination as set out in the Environment Agency response will be revised as part of the detailed CEMP secured via **dDCO [APP-041]** requirement 7. The Environment Agency are identified in Requirement 7 to be consulted on the detailed CEMP. Furthermore, **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]** and **ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [APP-092]** will also be revised as part of the detailed OEMP and DP secured via **dDCO [APP-041]** requirements 9 (OMEP) and 21 (Decommissioning and Restoration). |

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| | | maintenance uncovers unexpected contamination. This could have leached onto site since construction or be in a location not previously excavated. | |
| RR-025/21 | Outline Construction Environmental Management Plan | GWCL4 APP-089 Appendix 4.1 Outline Construction Environmental Management Plan, Table 3.4 Issue Requirement and instruction for dewatering is not clearly defined.<br>Impact Risk that permitting requirements for construction dewatering are not understood and legislation is incorrectly applied. Solution Provide more clarity regarding the thresholds and requirements for dewatering permits and exemptions in the oCEMP. To avoid future delays, ensure include recommendation that relevant permits are applied for ahead of commencement of construction as the time for approval of permits can be several months. Additional explanation In Table 3.4 it states "If water is encountered during below ground construction, suitable dewatering methods will be used. Any groundwater dewatering required in excess of the exemption thresholds will be undertaken in line with the requirements of the Environment Agency..." We agree with this instruction, but do not feel it is sufficient for a detailed plan to be produced, and it is insufficient for site workers to follow.<br><br>The same instruction should be added to a relevant section of the Outline Decommissioning Plan. | Table 3.4 of **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089]** will be revised with additional information included regarding thresholds and requirements for dewatering as part of the detailed CEMP secured via **dDCO [APP-041]** requirement 7. The Environment Agency are identified in Requirement 7 to be consulted on the detailed CEMP. Furthermore, relevant sections of **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]**, regarding dewatering thresholds and requirements will also be revised. will also be revised as part of the detailed OEMP secured via **dDCO [APP-041]** requirement 9. |
| RR-025/22 | Outline Fire Risk Management Plan | GWCL5 APP-091 Appendix 4.3 Outline Fire Risk Management Plan, Appendix B, item 12 Issue There is a lack of clarity regarding whether water will be used in firefighting, and the | The Outline Fire Risk Management Plan states a provisional intention for the BESS site to be self-sufficient during a battery based fire; however, it also notes that this approach will be |

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| | | need for firewater containment measures. The risk assessment assumes water will not be used in firefighting and states that the capture of firewater need only be added to drainage strategy if required. This contradicts para. 3.3.6 which discusses water supply options. Impact Risk of uncontrolled drainage of firewater if only the Fire Risk Management Plan is followed. Solution Update Fire Risk Management Plan so it is consistent with other documents. Ensure requirement for sealed drainage and other firewater containment measures are clearly outlined. Additional explanation in the design factors for Item 12 it states: “Should it be agreed that there is a need for use of fire water in a manner that risks mobilising combustion contaminants be agreed, the drainage design may be modified to attenuate fire water for later testing and offsite disposal as necessary.”<br>Use of firewater cannot be ruled out. Even if this isn’t the first line of defence, the local fire and rescue service may still need to use water. This must be captured to prevent potentially causing harm to the environment. Boundary cooling may be required; while this water is unlikely to be in direct contact with combustion materials, the possibility cannot be ruled out. Water may also come into contact with contaminants, dust and debris in the air.<br>Sealed drainage, water testing, automatic closures, and associated measures are specified in other chapters as if they will be included. See Appendix 8.2 (drainage strategy) sections 5.1.7, 5.3.4, 5.3.5, 5.3.17 and 7.1.2. In Section 5.3.16 it states “The proposed lined detention basin is to be used as a firewater | reviewed during development of the detailed Fire Risk Management Plan following battery product selection. Allowances are included in the preliminary designs for the BESS compound layout and drainage infrastructure to accommodate the potential outcome that fire water is determined as necessary during detailed design.<br><br>These allowances are also reflected in text elsewhere in the application where appropriate to accommodate this outcome. The Applicant accepts the EA’ s comments that use of firewater cannot be ruled out and will update the Outline Fire Risk Management Plan along with associated drawings to reflect a commitment to accommodate use of water for firefighting purposes on site. |

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| | | containment system. A pollution containment device … will be fitted … and closed in the event of a fire."<br>See also Appendix 8.3 (WFD Assessment) Section 6.4.2, where "automatic retention of any contaminated fire-fighting runoff" is given as a mitigation commitment, and ES Chapter 4 Section 4.4.24. The Draft DCO Schedule 1 Works 2 (BESS) includes "(g) fire safety infrastructure including water storage in tanks or other containers;"<br>In Appendix 8.3 (WFD Assessment), Table 6.3 it states: "The Outline Fire Risk Management Plan and Outline Operational Management Plan will also contain measures for controlling the risk of release of contaminants to the water environment.". We are not currently satisfied that it does.<br>In Appendix 4.4 (Outline Operational Management Plan), Table 3.3 it states: "Appendix 4.3 outline Fire Risk Management Plan [EN010163/APP/6.3.4] details the containment of firewater runoff (if applicable)." We do not agree that it does. | |
| RR-025/23 | Water and flood risk | GWCL6 APP-120 Appendix 8.2 Surface Water Drainage Strategy, sections 5.3.11, 8.2.2 (Table 8.2) Issue Proposal for drainage systems around BESS sites to be infilled with gravel.<br>Impact Potential for secondary release of contaminants from firewater which bind to gravel and are not tested or pumped out after a fire event. Potential accumulation of silt at base of gravels.<br>Solution Provide a procedure which explains how this issue will be managed. Additional explanation In Section 5.3.11 it states: "The BESS gravel storage provision will be lined to prevent | **ES Appendix 8.2 Surface Water Drainage Strategy [APP-120]**, at sections 5.3.11 and 8.2.2 (Table 8.2) will be revised as part of the Examination process to include management and maintenance details for the gravel lining drainage features. Requirement 16 of the **dDCO [APP-041]** secures additional Surface and Foul Water Drainage details are approved by the local planning authority prior to commencement of the authorised development. |

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| | | potential leaching of contaminants into the ground in the event of a fire." A typical schedule of maintenance activities for the granular stone material to be installed at the BESS compound is not clearly covered in Section 8.2.2 (Table 8.2).<br>The following scenario should be taken forward into any detailed design stage for BESS drainage design: - A fire takes place in a BESS battery container, and the fire suppression system is activated, automatically closing the drainage system. The suppression system ultimately extinguishes the fire, but the fire water is contaminated by the fire damaged batteries. If a gravel attenuation substrate is used, consider how any sorbed contamination in this substrate would be managed, as this could act as an ongoing secondary source of contamination via rainwater post-event. If the substrate is found to have an ongoing issue would all containers need to be removed to enable remediation of this material? Catchment zoning and isolation should be considered in this case. Alternatively, an above-ground attenuation system would make managing sediment or surface contamination easier. | |
| RR-025/24 | Surface Water Drainage Strategy | GWCL7 APP-120 Appendix 8.2 Surface Water Drainage Strategy, Section 8.2.4 (Table 8.4) Issue The typical schedule of maintenance activities for the automatic shutdown valve to be installed at the BESS downstream manhole does not appear to include testing of the valve. Impact Traditional penstocks, when not operated for a long period of time, have historically been known to seize up and thus be inoperable at times of emergency. Solution Ensure operation of the valve is included in the | **ES Appendix 8.2 Surface Water Drainage Strategy [EN010163/APP/6.3.8]**, at section 8.2.4 (Table 8.2) will be amended during the Examination process to include the testing of the penstock valve as a maintenance activity.<br>Requirement 16 of the **dDCO [EN010163/APP/3.1]** secures additional Surface and Foul Water Drainage details are approved by the local planning authority prior to commencement of the authorised development. |

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| | | maintenance schedule. Additional explanation We welcome the proposal to incorporate a penstock valve which is automatically triggered in the event of a BESS fire, with a detailed maintenance plan. | |
| RR-025/25 | Water and flood risk | GWCL8 APP-121 Appendix 8.3 Water Framework Directive (WFD) Assessment Issue The potential for impacts of dewatering on shallow WFD groundwater bodies has not been considered. Impact Risk of negative impacts on shallow groundwater. Solution Ensure that impacts of dewatering have been considered. Additional explanation In Table 6.3 it states: "No groundwater abstractions are proposed during the construction / decommissioning or operational phases." However, shallow groundwater is expected across the site and localised temporary dewatering may be required during construction and decommissioning. The impacts of this should be considered in the WFD assessment. | **ES Appendix 8.3 Water Framework Directive (WFD) Assessment [APP-121]** sets out shallow groundwater does not appear to be continuous beneath the site. With reference to BGS borehole logs, shallow groundwater appears to comprise isolated pockets of groundwater associated with permeable deposits. Any de-watering (where required) would be temporary in nature and would result in the abstraction of only small quantities of groundwater. The impact on shallow groundwater flows (particularly in the context of the apparent isolated nature of perched groundwater) is considered to be negligible. Pollution control measures, as specified within the oCEMP, will ensure there is no significant risk of contamination of shallow groundwater, resulting in a negligible impact on shallow groundwater quality from dewatering activities.<br>The above discussion can be added to future revisions of the WFD Assessment as part of the Examination process. |
| RR-025/26 | Land Contamination | GWCL9 APP-082 Environmental Statement Appendix 2.2 Phase 1 Geoenvironmental Desk Study Report, Appendix B Issue Record of historical maps is incomplete. Duplicate maps included instead. Impact Not all maps can be reviewed. Solution Update Appendix B to remove duplicate maps and supply those currently missing. Additional explanation Historical maps in Desk Study Appendix B have repetition of the West 1:2,500 maps: PDF | **ES Appendix 2.2 Phase 1 Geoenvironmental Desk Study Report [APP-082]**, Appendix B will be revised as part of the Examination process by removing duplicate maps and provide those that are missing. |

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| | | Part 1 page 63 to PDF Part 2 page 124 is same as PDF Part 3 page 107 to PDF part 4 page 173. The East 1:2,500 scale maps are missing. | |
| RR-025/27 | Groundwater and Contaminated Land | GWCL10 Document Reference(s): APP-041 3.1 Draft Development Consent Order, Schedule 2 Requirements Part 1 Requirements, 7 (2) (H) Issue Instruction for unexpected contamination should include reference to local planning authority (LPA) Impact LPA might not be consulted on a matter which they need to see Solution Include LPA within this requirement Additional explanation Requirement 7(2)(H) states: "a protocol requiring consultation with the Environment Agency in the event that unexpected contaminated land is identified during ground investigation or construction;" The LPA should also be consulted. Not all matters will be under the jurisdiction of the Environment Agency. | Requirement 7 of the **dDCO [APP-041]** specifically states a CEMP must be submitted and approved by the local planning authority in consultation with the Environment Agency and Natural England. Further, requirement 12of the **dDCO [APP-041]** states that no phase of the authorised development and no part of the site preparation works for the phase comprising remedial work in respect of any contamination may commence until a contamination risk assessment in respect of soils has been produced and submitted to and approved by the local planning authority in consultation with the Environment Agency. The Applicant does not agree that further amendments to the **dDCO [APP-041]** are necessary**.** |
| RR-025/28 | Water and Flood Risk | GWCL – Additional points for consideration APP-055 5.1.1 Consultation Report Appendices Part H APP-066 6.2.8 Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage APP-121 6.3.8 Appendix 8.3 Water Framework Directive Assessment Point for consideration: We have previously commented on the limited localised heating of the ground and any groundwater present in the immediate vicinity of the HV cables. The applicant has determined in ES Chapter 8, Section 8.7.30, and the WFD Assessment, Table 6.3, that any impacts are considered to be of negligible magnitude resulting in an effect of negligible significance (not significant). The effect would be temporary, direct and of local importance. | The Applicant notes this comment and the agreement from the Environment Agency regarding potential for only limited localised heating of the ground and any groundwater present in the immediate vicinity of the HV cables. In view of the absence of any identified sensitive receptors, detailed calculations or assessment were not considered proportionate by the Applicant and therefore will not be provided. If the Environment Agency is aware of publicly available data that would suggest a potentially significant impact on groundwater receptors the Applicant would request this data is provided for consideration. |

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| | | We are minded to agree with this conclusion, however the applicant has provided no data for the thermal characteristics of new buried HV cables and the extent of their anticipated interaction with groundwater. We would welcome sight of the data and calculations the applicant has used to complete their assessment. | |
| RR-025/29 | Water and Flood Risk | APP-066 6.2.8 Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage, Table 8.1 Point for consideration: The applicant has proposed that Source Protection Zone (SPZ) 3 should be determined as low sensitivity, alongside unproductive aquifers. We disagree with this. SPZ3 is typically used to delineate the total catchment of a potable water abstraction, and as such should be at least medium sensitivity, alongside SPZ2. Unproductive aquifer designation is distinct from SPZ designation and the two should not be confused.<br>The site is not within an SPZ, and so the definition does not directly affect this assessment. However, for accuracy and to ensure this is not used as a precedent for other schemes, this reference should be amended.<br>We note also the qualifier “highly vulnerable” before Principal aquifers in the High sensitivity definition. As no other sensitivity for Principal aquifers is suggested, and all such aquifers could be considered “highly vulnerable”, the qualifier is unnecessary and may lead to confusion or ambiguity. We suggest “highly vulnerable” be removed from the text. | Table 8.1 from **ES Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066]** will be revised as part of the Examination process as detailed in the EA comments regarding SPZ3 and principal aquifers. |
| RR-025/30 | Outline Fire Risk Management Plan | APP-091 6.3.4 Appendix 4.3 Outline Fire Risk Management Plan, Appendix C (i.e. APP-030 2.25 Outline Fire Risk Management | In line with the agreed changes to the **Outline Fire Risk Management Plan [APP-030]** to commit to accommodating the |

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| | | Layout Plan) Point for consideration: The Outline Fire Risk Management Layout does not show the proposed drainage basin and automatic closures. We are pleased to this is shown on APP-031 2.26 BESS Layout Detail Plan but feel it would be highly beneficial to this drawing.<br>The Outline Fire Risk Management Layout shows a "gravel or asphalt" surface finish. Asphalt is typically impermeable (and this drawing does not specify otherwise) so it is important that readers understand where water might drain to. In the BESS/Substation Surface Water Drainage Strategy Plan (APP-120 6.3.8 Appendix 8.2 Surface Water Drainage Strategy Appendix F), only gravel is annotated with no mention of asphalt. Design details should be consistent to avoid confusion. | use of water for firefighting purposes, the Applicant will update the **Outline Fire Risk Management Layout Plan [APP-030]** to include the drainage basin and penstock valve.<br>The Applicant acknowledges EA comments concerning the specification of BESS compound surface finish. Deliverables will be updated where appropriate to specify a gravel compound surface finish only, removing the asphalt option. |
| RR-025/31 | Water and Flood Risk | APP-066 6.2.8 Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage, Table 8.5 APP-120 6.3.8 Appendix 8.2 Surface Water Drainage Strategy, Table 3.1 APP-121 6.3.8 Appendix 8.3 Water Framework Directive Assessment, Table 5.3 Point for consideration: Minor differences between the summary of borehole data between Chapter 8 and Appendix 8.3 when compared to the same information in Appendix 8.2. consider updating Table 3.1 in Appendix 8.2 so it is consistent with the other documents. The discrepancy is unlikely to cause any issues, but the inconsistency could cause confusion or lead to errors. We previously commented on this table in our response to a previous draft of the WFD Assessment.<br>5. Water Quality APP-089 6.3.4 Appendix 4.1 Outline Construction Environmental Management Plan, Table | Table 3.1 of **ES Appendix 8.2 Surface Water Drainage Strategy [APP-120]** will be revised as part of the Examination process. Summaries of borehole data will be amended as per information provided in Table 5.3 of **ES Appendix 8.3 Water Framework Directive Assessment [APP-121]**.<br>With regards **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089]** and EA comments regarding Water Management Plan, Foul Water Management and Pollution Incident and Emergency Response Plan, these will be picked up by the detailed CEMP secured by Requirement 7 of the **dDCO [APP-041]** that specifically states a CEMP must be submitted and approved by the local planning authority in consultation with the Environment Agency. |

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| | | 3.4: Hydrology, Flood Risk and Drainage Issue The oCEMP omits some specific topics that should be included at this stage to ensure they are taken into the detailed CEMPs. Impact Risk of environmental harm arising from construction impacts. Solution Expand wording of the oCEMP to ensure that the detailed CEMPs include the following: Temporary Construction Drainage Strategy The CEMP should include a detailed drainage strategy covering infrastructure layout, runoff management, particularly during heavy rainfall, and treatment methods for discharges to controlled waters, such as the Catchwater Drain. Further detail on treatment methods will be required to ensure compliance with water quality standards. Any discharges to surface waters will need a valid Environmental Permit and must not pose a risk to the receiving watercourse.<br>Water Management Plan Amend wording of oCEMP 'General' to ensure the Water Management Plan specifies monitoring parameters, sampling locations, sampling frequency, and consider the use of real-time sensors for continuous monitoring in high activity areas. Include post-construction monitoring to assess long-term impacts on watercourses.<br>Foul Water Management. Expand wording of oCEMP to include a new section 'Foul water management' to ensure the detailed CEMPs include details of estimated effluent volumes, storage | |

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| | | capacity, tankering arrangements, and contingency measures in the event of service disruption.<br>Pollution Incident and Emergency Response Plan Expand wording of oCEMP 'Spillage Risk' to ensure the Emergency Response Plan outlines spill response procedures, staff responsibilities, training, spill kit locations, and the process for notifying relevant authorities. | |
| RR-025/32 | Water and Flood Risk | Appendix 2: Work Package Tracker Subject Work package Scope Method Results Mitigation Requirement Tier1 (matter for refusal)/ Tier2 (can be resolved in inquiry) Notes Flood risk Flood Risk Assessment T2 Further clarity required regarding the impact of extreme flood (breach) events; the assessment of flood risk from ordinary watercourses; and flood risk beyond 2069. Ecology and Fisheries Decommissioning Plan T2 Include aquatic habitats and species in the Decommissioning Plan Ground water & contaminated land Conceptual Site Model T2 Not all sources of contamination have been assessed. oCEMP T2 The assessment of potential ground contaminants should include groundwater testing as well as soil testing. Surface Water Drainage Strategy T2 Further detail required regarding drainage design around BESS Water Quality oCEMP T2 Further details required regarding mitigation measures Key: Not yet agreed Agreed Not applicable | The Applicant notes this summary of actions and will engage with the Environment Agency to seek to resolve outstanding matters as part of the Examination process. A Statement of Common Ground (SoCG) is currently being negotiated between both parties. |

## Table 2-12: Forestry Commission

| ID | Theme | Verbatim Comment | Response |
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| RR-024/1 | Ancient & Veteran Trees | Ancient and veteran trees are irreplaceable habitats. Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states:<br><br>"The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists."<br><br>The Joint NE/FC Standing Advice states that for or ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.<br><br>The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals). | **ES Appendix 6.5 Arboriculture Impact Assessment [APP-101]** sets out one oak (T493) has been recorded as a 'veteran' tree. However, it could also be considered to be 'ancient' due to its exceptionally large stem diameter. This tree is located outside of the Order Limits but the applied 30m buffer extends into the bounds of the eastern most portion of the site.<br><br>The Root Protection Area (RPA) of this tree enters the Order Limits on the eastern boundary that is shown as part of the Eastern Biodiversity Mitigation Area on the **Site Layout Plan [APP-011]**. No development will take place in the RPA of T493 Requirement 3 of the **dDCO [APP-041]** secures an Arboricultural method statement (AMS) and which will ensure the RPA of T493 is safeguarded. |

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| | | Due to the irreplaceable nature of ancient and veteran trees, most temporary effects will result in irreplaceable damage.<br>An RPA of 30m has been specified in the Arboricultural report, it is important to ensure the RPA should be avoided and protected, especially in the case of any construction traffic where roots are particularly vulnerable to compaction. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction. | |
| RR-024/2 | Mixed Deciduous Woodland & Traditional Orchard – Priority Habitat | Mixed deciduous woodlands are listed on the National Forest Inventory and the Priority Habitat Inventory (England).<br>These were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".<br><br>Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development. | Paragraph 7.8.70 and 7.8.71 from **ES Chapter 7: Ecology and Biodiversity [APP-065]** confirm potential adverse impacts during the construction and decommissioning phases from pollution incidents and soil sediment discharge will be avoided by implementing standard measures for pollution prevention, dust suppression and soil erosion and run-off. Measures such as fencing and toolbox talk briefings will be implemented during construction to prevent soil compaction and accidental damage to retained habitats such as by encroachment of vehicles. This would be overseen by an Ecological Clark of Works (ECoW). Mitigation for impacts on retained habitats during the construction and decommissioning phases, as described above, would be controlled via **Appendix 4.1 - Outline Construction Environmental Management Plan [APP-089]** and **Appendix 4.2 Outline Decommissioning Plan [APP-090]**. |

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| | | The documents state that the woodlands and the orchard will be afforded a 15m buffer, tree protection measures including the creation of construction exclusion zones will be created and that no artificial lighting will be used adjacent to the woodland and bat foraging areas.<br><br>We also note that some areas of new woodland planting will be created in the areas around the existing woodland. | |
| RR-024/3 | Tree and Woodland Planting | There are several areas of woodland planting planned on the landscape strategy.<br><br>As stated in the Environmental Improvement Plan 2023, it is a strategic government objective to increase the net area of tree canopy and woodland cover to 16.5% of total land area in England by 2050. It goes on to state that that increasing tree cover is key to achieving the Net Zero Strategy and species abundance targets.<br><br>Consider the size and location of the site, with the low level of canopy cover both in the site and the surrounding landscape, there is the opportunity to increase the canopy cover of the site further still. There is also the opportunity for some buffer woodland or woodland edge planting to help minimize the effects of construction of the existing woodland.<br>While there are several areas of woodland planting planned, the habitat connectivity between these woodland blocks could be | Section 6.5 and Appendix D of the **Planning Statement APP-182]** sets out there are no designated ancient woodlands or Tree Preservation Orders ('TPOs') within the Order Limits. The closest ancient woodland is 1.3km to the east of the Site (known as Burton Wood) and no ancient woodlands have direct habitat connectivity with the Site, via hedgerows, other semi-natural habitat corridors, or footpaths. No veteran trees will be adversely impacted by the Proposed Development. Therefore, the Applicant does not consider that the Proposed Development presents a risk of threat to the biosecurity of ancient woodland.<br><br>Paragraph 7.8.65 and 7.8.66 of **ES Chapter 7: Ecology and Biodiversity [APP-065]** confirms there will be approximately 1.08 km of hedgerow loss at the Site, which will be compensated through the planting of 25 km of new species-rich hedgerows, plus reinstatement of losses where works are temporary (such as at cable crossings). Enhancement of existing hedgerows will be undertaken to approximately 8.7 km of the existing network, through infill planting of gaps, and planting of tree standards. |

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| | | improved to ensure maximum gains and making the woodland more resilient and benefit biodiversity across the whole site. The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases particularly in areas with ancient woodland. | Paragraph 7.8.67 of **ES Chapter 7: Ecology and Biodiversity [APP-065]** confirms all woodlands and orchards are retained and protected by the designed in measures. Further enhancement of woodland is provided by complementary planting, for example further woodland creation is proposed adjacent to Fenton Gorse which will enlarge it.<br><br>Existing hedgerows, trees and woodland to be retained will be buffered from the development and habitat diversity will be managed as set out in the **ES Appendix 7.12 outline Landscape and Ecological Mitigation Plan (oLEMP) [APP-116].**<br><br>Proposed Enhancement Works are set out in **Figure 6.9 Outline Landscape and Ecological Mitigation Strategy [APP-160]** and in **Appendix 7.14 Outline Landscape Ecological Management Plan [APP-116]**, As summarised in paragraph 7.8.72 and 7.8.73 **of ES Chapter 7: Ecology and Biodiversity [APP-065]** the Eastern mitigation area includes native species woodland and scrub creation (approximately 2 ha) and hedgerow enhancements (up to 3km) and creation (1.3 km). The Western mitigation area includes native species woodland and scrub creation (3.4 ha).<br><br>Requirement 6 of the **dDCO [APP-041]** secures a Landscape Ecological Management Plan (LEMP). This will include widths of the buffers to protect existing trees and hedgerows that vary according to the value of trees and hedgerows, possible bat roosts etc. Requirement 6 will also secure woodland and |

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| | | | hedgerow planting as hedgerow enhancement.**ES Appendix 7.12 Biodiversity Net Gain Report [APP-114]** sets out the results of the Proposed Development's BNG assessment and concludes an overall net gain over or at least 10%.<br><br>A fundamental part of the Proposed Development's design are the principles of BNG with significant areas identified for habitat creation and enhancement. In addition to the above, land below and between the PV arrays will also be managed to enhance biodiversity.<br><br>The Applicant's assessment is correct and properly applies the requirements for the protection of biodiversity. |
| RR-024/4 | Land Management | We note plans are in place for the long term management and maintenance of both the new and existing woodlands on site. As this project includes a large area of deer fencing, it has the scope to exclude a large amount of farmland from the deer range in the area. This is likely to increase herbivore browsing and grazing to other areas in close proximity to the site. Impacts are likely to increase in surrounding woodlands and the wider landscape, where hedgerows and stewardship schemes may be impacted upon.<br><br>Large scale fencing will change how deer move through the landscape, which may also increase the numbers of deer crossing local roads and therefore may increase the numbers of deer | **ES Chapter 7: Ecology and Biodiversity [APP – 065]** considers the proposals impact to deer. Deer fencing is only proposed to safeguard equipment within the **Order Limits [APP-009]** and set back within the site with off sets (i.e. for maintenance) to existing boundary hedgerows and trees. It would not prevent grazing and movement of deer, for example, within the two proposed biodiversity mitigation areas, within the offset between the fence and boundary hedgerow/trees, along public rights of way, permissive paths or along watercourses.<br><br>Paragraph 7.8.67 of **ES Chapter 7: Ecology and Biodiversity [APP – 065]** confirms all woodlands and orchards within the **Order Limits [APP-009]** will be retained and protected by the designed in measures. Further enhancement of woodland is |

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| | | vehicle collisions in the area. If culls occur prior to development, the risks should reduce. | provided by complementary planting, for example further woodland creation is proposed adjacent to Fenton Gorse which will enlarge it, which will also benefit a range of animal species including deer. |

## Table 2-13: Historic England

| ID | Theme | Verbatim Comment | Response |
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| RR-045/1 | Setting of Designated Heritage Assets | Within or response to the PEIR, we raised concerns over some of the term of assessment in regard to change in setting to designated heritage assets. With specific reference to the Grade II* listed Church of St Peter and St Paul (NHLE: 1275773)within Sturton le Steeple, the PEIR NTS notes some visible built form in the wider surrounds of the asset, and recognises that it will impact some longer distance views towards the church tower, but suggests that this would no impact the significance of the asset, this would need to be carefully evidenced against our published guidance regarding the setting of Heritage assets. Further to this, Chapter 9 of the PEIR states that views are considered as part of the ZTV, and it is however acknowledged that the setting of an asset does not rely wholly on visibility, therefore further assessment should be considered. We would highlight that change in setting should be carefully assessed, with particular attention given as to whether this change in setting affects the significance of the designated assets. We note that the applicant has stated that the assets previously raised have been addressed in Appendix 9.1 - Cultural Heritage Technical Baseline [EN010163/APP/6.3.9]. | A description of the significance of heritage assets included within **ES Chapter 9: Cultural Heritage [APP-067]** in accordance with NPS EN-1 paragraphs 5.9.9 to 5.9.12 and NPS EN-3 paragraphs 2.10.107 to 2.10.119.<br>Residual effects upon designated assets arising through changes to setting are limited to six (6) designated heritage assets and are not significant in EIA terms, see Section 9.9, and Table 9.5 of **ES Chapter 9: Cultural Heritage [APP-067]**. In the case of the Proposed Development, which is time limited (NPS EN-3 2.10.160), the significant public benefits of the Proposed Development in terms of renewable energy generation and climate change benefits clearly outweigh the reversible less than substantial harm to the significance of the 6 identified designated heritage assets and low level of harm to the significance of the non-designated heritage assets.<br>Assessment of effects of the Proposed Development on non-designated heritage assets are stated in Section 9.9, and Table 9.5 of **ES Chapter 9: Cultural Heritage [APP-067]**, and non-designated heritage assets are discussed in detail in Section 9.6 of the ES Chapter, and Section 5, and Appendix 1 of **Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122].** It is therefore considered that no further assessment with regard to non-designated assets is required, beyond what is proposed with regard to archaeological deposits. |

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| | | | As outlined in paragraphs 9.7.1-9.7.2 of **ES Chapter 9: Cultural Heritage [APP-067]**, design of the Proposed Development has been developed to minimise harm to heritage assets and their settings through embedded mitigation, avoiding archaeological sensitive areas entirely or preserves them in situ i.e. by ground-mounting solar panels. |
| RR-045/2 | Buried archaeological remains | It is stated within the Environmental Statement that Appendix 9.2 - Magnitude Surveys Geophysical Survey Report [EN010163/APP/6.3.9] has informed the layout of the Proposed Development. It has also informed the mitigation strategy for identified areas of archaeological interest (Appendix 9.3 – Archaeological Mitigation Statement (AMS) [EN010163/APP/6.3.9]). We welcome and note that the scheme limits have been amended to exclude four discrete areas of higher archaeological sensitivity (areas A-D in the Archaeological Mitigation Strategy).<br><br>However, we also note with the AMS that though excluded from the Proposed Development, they have been retained within the Order Limits as areas of meadow/grassland, or ecological mitigation.<br><br>We would reiterate at this opportunity that varies types of ecological mitigation would have the potential to harm below ground archaeological remains, and thus will require further consultation and consideration of appropriateness in term of | No development is proposed within the archaeological exclusion areas, and details with regard to the proposed ecological mitigation have been included within the Archaeological Mitigation Statement **(Appendix 9.3 [APP-124])**. As outlined in the Archaeological Mitigation Statement (AMS), with the exception of Area A, which will remain in arable use, exclusion areas will be fenced off during construction, to prohibit access by plant and personnel, with construction monitored by an Archaeological Clerk of Works (see paragraphs 3.2-3.8). With regard to impacts directly associated with the ecological mitigation strategy, these are outlined at paragraphs 3.9-3.14, and all activities associated are anticipated to be consistent with current land management within these areas. |

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| | | preservation in situ; we welcome further consultation on this topic. | |
| RR-045/3 | Trial trenching | We also note that a programme of pre-determination trial trenching targeting 'fixed' areas of large scale development is proposed (Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [EN010163/APP/6.3.9]). This would appear to indicate that other high potential areas will only be trenched (post DCO) if impacts cannot be avoided by design, and other areas may not be trenched at all. This approach to trial trenching raises two areas of concern, firstly that there is potential confirmation bias where areas assessed from geophysical survey as low potential / blank appear not to be tested.<br><br>In other areas risk appears to be pushed later into the process where the capacity to respond through adaptive design or excavation may reduce due to timing / costing pressures. The inherent uncertainty as to whether features of apparent lower density / complexity in the geophysical results are not in fact more complex, remains generally untested. There exists significant opportunity for further evaluation trenching to be undertaken during the examination period. | The Applicant considers that there may have been a slight misunderstanding in the approach to trenching proposed. A programme of pre-determination trial trenching has been undertaken on 'fixed' areas of large-scale development, in consultation with the LPA's Archaeological Advisor, the scope of which is outlined in **Appendix 9.4 – Outline Written Scheme of Investigation for Pre-Determination Trial Trenching [APP-125]**). The scope of further trenching and/or mitigation to be undertaken post-consent across the remainder of the Proposed Development, will be agreed with the LPA's Archaeological Advisor(s) (**Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**).<br><br>It is the case that the further evaluation and mitigation proposed would be undertaken post-consent. Given the existing mitigation measures **Appendix 9.3 – Archaeological Mitigation Statement [APP-124]**), archaeological potential, and the inherently flexible nature of solar development that allows a range of potential mitigation measures should significant archaeological remains be encountered, it is considered that this is a proportionate and appropriate course of action (**Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**). |

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| | | Any work that can be achieved in parallel with exam can only positively assist in the management of risk of loss to archaeological remains or delay and unmanaged costs in the construction process. We strongly urge the applicant to continue to engage constructively with the local government archaeological advisors in targeting the next tier of risk following on from the trenching work already undertaken.<br>The layering of investigative techniques generally improves results. We also raised in our section 42 response the reference in the PEIR to both colluvial deposits and ridge and furrow. We asked that the potential for colluvial deposits and ridge and furrow to mask and obscure underlying archaeological deposits be considered, and appropriate mitigation be demonstrated. | The Applicant notes the comments raised but is satisfied that the measures put forward within **Appendix 9.3 – Archaeological Mitigation Statement [APP-124]**) and (**Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**) provide the opportunity to evaluate and mitigate archaeological risk. It is also noted that evaluation is more harmful to archaeological deposits than the insertion of the solar arrays and so in order to minimise the removal of archaeological deposits unnecessarily (for example if the Scheme is not granted consent), trenching in areas which are inherently more flexible in terms of mitigation is proposed post-consent. The **Outline Written Scheme of Investigation for Post-Consent Archaeological Works** (**Appendix 9.5, [APP-126])** has been prepared, outlining the methodology for further evaluative works, and a range of mitigation options, depending on the results. This would allow areas where ridge and furrow and/or colluvial deposits are encountered to be investigated and an appropriate archaeological response implemented. |
| RR-045/4 | Draft DCO | As submitted the draft DCO requirement 17 reads as follows:- Archaeology 17.— (1) No phase within the authorised development, and no part of the site preparation works for that phase, may commence until an archaeological written scheme of investigation (WSI) for that phase has been submitted to and approved by the local planning authority in consultation with the county archaeologist. | Requirement 17 of the **dDCO [APP-041]** sets out that no phase within the authorised development, and no part of the site preparation works for that phase, may commence until an archaeological WSI for that phase has been submitted to and approved by the local planning authority in consultation with the county archaeologist.<br><br>Requirement 17(3) states that any archaeological works must be carried out in accordance with the approved WSI, as set out in |

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| | | Any archaeological works or programme of archaeological investigation carried out under the approved WSI must be carried out by an organisation registered within the Chartered Institute for Archaeologists or by a member of that Institute, and the nominated organisation and its relevant specialists will be identified and agreed within the WSI.<br><br>Any archaeological works must be carried out in accordance with the approved WSI, including post-excavation analysis, reporting, publication and archiving as set out in the outline WSIs. Specific Comments on the draft DCO Though the draft DCO as submitted states the requirement for an archaeological written scheme of investigation, this reinforces the absence of a mechanism for the results of post-DCO evaluation to also inform mitigation alongside the Outline Written Scheme of Investigation (oWSI).<br><br>In those cases where additional assessment stage trial trenching was to be undertaken post-DCO there needs to be a mechanism whereby the results of that work have a material bearing upon the subsequent phase of archaeological mitigation scheme. This should be secured within the DCO.<br><br>We would also highlight that the written scheme of investigation must be in accordance with the archaeological mitigation strategy, of which there is no mention in the draft DCO. This allows for a holistic and reciprocal flow of data and information between the management documents and therefore creates a | the outline WSIs. Therefore, it isn't a correct characterisation to say that there is no mechanism for the result of the post-DCO evaluation to inform mitigation. The WSI must conform with the outline WSI (oWSI).<br><br>Paragraph 5.7 of the **oWSI for post-DCO archaeological works [APP-126]** states that the following mitigation options provide the range of possible responses to result of the evaluation:<br>1. No further works required<br>2. Archaeological watching brief<br>3. Strip map search, (SMS) or open area excavation<br>4. Preservation in situ using no dig construction methods<br>5. Preservation in situ by excluding areas from the development.<br>Paragraph 5.8 states that any such works would need to be agreed with the Consultant and Archaeological Advisor as defined in the oWSI.<br><br>The oWSI requires that specific method statements are prepared where they are required. The DCO itself does not need to specify this, as the undertaker is bound by requirement 17 to follow the oWSI.<br><br>In relation to the archaeological mitigation statement submitted into examination **(6.3.9 Appendix 9.3 Archaeological Mitigation Statement [APP-124])**. This AMS refers to the process of protection of the archaeological exclusion zones. These exclusion |

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| | | synthetized approach to the mitigation of harm to buried archaeological deposits. | zones do not need to be specifically referred to in requirement 17. This is because they are built into the design of the Proposed Development. This is managed through requirement 3.<br><br>Requirement 3 states that no phase of the development may commence until details of the layout of the phase have been approved by the LPA. Requirement 3(2) states that the detail must accord with the site location plan, works plan and design parameters and principles.<br><br>The design parameters and principles mean the principles and assessments set out in the environmental statement.<br>Therefore, the Applicant has already sufficiently protected those exclusion sites within the wording of the DCO. |

## Table 2-14 Holcim UK

| ID | Theme | Verbatim Comment | Response |
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| RR-012/1 | Project Interactions | Holcim UK Limited are developing the adjoining Sturton Le Steeple Quarry and will be seeking to formalise a Cooperation Agreement with RES in relation to any cables crossing the quarry access road or any use of the quarry access road. | The Applicant notes the comment from Holcim and is committed to further engagement with Holcim UK Limited. |

## Table 2-15: Natural England

| ID | Theme | Verbatim Comment | Response |
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| RR-054/1 | Survey Methods | NE have reviewed appendix 7.4 and appendix 7.6 and are satisfied with the ornithology survey methods used. As stated in our EIA Scoping & S42 responses with regard to wintering birds: where there remains any doubt about the use of the site by species associated with international designations, further survey is likely to be required over a 2nd winter. In this scenario, due to the separation distance to relevant designations and numbers of qualifying species recorded to date, NE consider the single year's wintering bird survey effort likely to be satisfactory to enable a robust assessment.<br>NE have no further comments regarding survey methods in relation to Internationally designated Sites. | The Applicant notes that Natural England have no further comment regarding survey methods. |
| RR-054/2 | Protected Species Licencing | The project design principles include the avoidance of impacts to protected species as far as possible, to avoid the need for mitigation & protected species licencing, which is welcomed.<br>It is noted that since our Section 42 comments, licences for bats and great crested newts are not likely to be required. As a result, the only species licence requirement reported in the ES appears to be for Badger: 'A badger development licence is likely to be required for temporary impacts to a small number of setts' (ES paragraph 7.8.165 & P147 (Appendix 4: Table 7.9)).<br>If avoidance and appropriate buffering of all setts is not possible, a licence will be required, and we would recommend that a draft protected species licence application is submitted to enable Natural England to issue a Letter of No Impediment (LoNI). | The Applicant is in liaison with Natural England to prepare a draft Badger Licence Application to enable Natural England to issue a LoNI as suggested. These discussions will be updated as part of the examination process and within the **Consent and Agreements Position Statement [APP-181].** |

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| | | This will provide the planning inspectorate with certainty during examination that impacts to badger can be mitigated.<br>To date, Natural England have not received a draft protected species licence application for badger. | |
| RR-054/3 | ALC Survey Methodology | Natural England welcome the completion of an ALC survey across the Solar PV areas (722ha), in line with the 1988 ALC Guidelines & at a detailed level (1 auger per hectare with representative pits). However, no ALC survey has been undertaken in the Cable Route or Enhancement Areas:<br><br>A) Cable Route<br>Natural England advised in our Section 42 response that, whilst cable laying works are short term and temporary, they have the potential to damage the soil resource and soil profile, including the potential for degrading agricultural land quality. This advice remains relevant and Natural England consider any soil handling activities have potential to damage the soil resource. ES Table 15.4 also sets out the PINS request for the ALC survey to have sufficient coverage, including the cable route.<br>ES paragraph 15.7.18 states that soils will be 'checked' prior to construction to inform the SMP. Natural England advise that a full ALC survey of the cable route will be required to inform the soil handling practises necessary to minimise potential damage and provide a baseline soil profile to which the restoration can be compared to demonstrate the land has been appropriately reinstated.<br>B) Enhancement Areas | Natural England's comments relate to the Cable Route and Enhancement Areas, across which no ALC has been completed. The Applicant's intentions are to minimise soil disturbance and to minimise adverse effects on agricultural land quality. The issues for these two areas are slightly different.<br><br><u>Cable Route</u><br>The Cable Route areas are relatively short, connecting between the main areas, as shown on the ALC plan (**ES Appendix 15.1 Agricultural Land Classification Report, Appendix I [APP-131]**). They have not been surveyed (paragraph 15.7.18 of **ES Chapter 15: Land Use and Agriculture] [APP-072]**, as it is not considered that land quality will be adversely affected.<br><br>Deferring soil surveys for cable routes until post DCO has been accepted on a number of NSIP schemes, including EN010123 Heckington Fen Solar Park, and most recently EN010142 Tillbridge Solar Project.<br><br>We agree with Natural England that disruption to the soil has the potential to adversely affect soil resources and soil profile. An additional chapter to the **oSMP [APP-132]** will be drafted and consulted upon with Natural England to ensure that Agricultural |

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| | | Paragraph 5.3.2 of Natural England's Section 42 response discussed the potential impact of intrusive ecological enhancements on the soil resource, and advised a full ALC survey should be undertaken across the enhancement areas to inform both avoidance of BMV land and soil handling/re-use where required.<br>ES paragraph 15.7.13 states that no soil disturbance will occur within the enhancement areas; as such, no ALC survey has been undertaken in these areas.<br>Natural England note that the majority of the Enhancement Areas are to be used for skylark mitigation (including continued arable rotation) and grassland creation. As such, whilst a full ALC survey of these areas, and the full order limits, is always Natural England's advice, the absence of survey in these areas is not raised as a significant concern.<br>However, Figure 6.9 includes small areas of pond creation and woodland planting. These measures have the potential to damage the soil resource. Woodland creation is considered to remove the possibility for land to be returned to agricultural use, and pond areas are likely to involve a degree of soil stripping, so an ALC survey is essential to inform the depth of topsoil (and suitability of subsoil to support a pond). There will then also be the surplus soil to consider. Whilst the total volume will likely be small, it is still an important consideration to ensure there is a certainty of re-use of the soil (preferably on site), in line with NPS EN-1 paragraph 5.11.14. | Land Classification (ALC) grade is recorded and protected during the cabling works.<br><br>**<u>Enhancement Areas</u>**<br>Natural England (NE) comment that they recognise that the majority of the Enhancement Areas are to be used for skylark mitigation (including continued arable rotation) and grassland creation and conclude that "**the absence of [ALC] survey in these areas is not raised as a significant concern**".<br><br>NE's concern relates to the small areas of pond creation and woodland planting. An ALC is considered essential, NE state, to inform the depth of topsoil and suitability of subsoil to support a pond. Reference is made to Figure 6.9 of the **Landscape Ecological Mitigation Strategy [APP-160]**.<br><br>The areas to which these comments are directed are shown below. The eastern areas lie within an arable field, the western areas within permanent pasture. |

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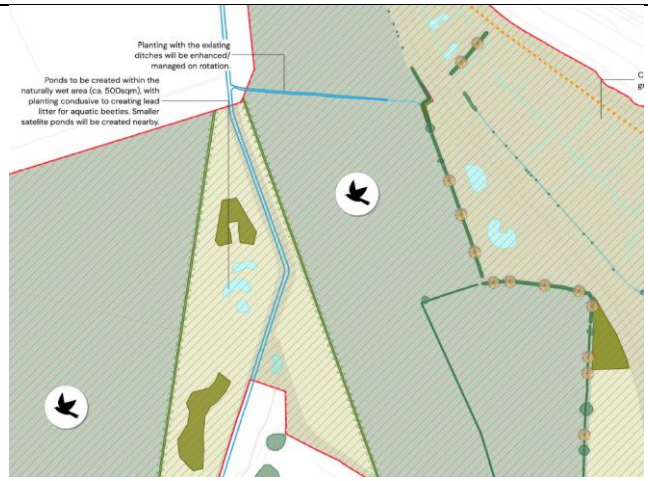
| | | |  <br>It is intended that these features are permanent. However, at the landowner's request they could be returned to agricultural use. Accordingly, the **Outline Soil Management Plan (oSMP) [APP-132]** will be expanded to include a chapter on the pre-construction assessment, and on soil handling and storage, so that these areas can be restored in the future. This would be subject to details controlled through the Soil Management Plan, secured by Requirement 11 (SMP) of the **dDCO [APP-041]**.<br>Permanent use of agricultural land for woodland is grant funded by Government, with no consideration given to the ALC grade as part of the application process. Funding to create or restore small ponds may be available under schemes such as the Countryside Stewardship Higher Tier (item WN12), without land quality assessment. |

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| | | | The Applicant will consult NE on an additional chapter to the **oSMP [APP-132]** to address these issues and to ensure that if land is to be restored in the future from pond creation, this will be possible back to comparable ALC grade. |
| RR-054/4 | ALC Survey Results and Data Presentation | The ALC survey was undertaken across 722ha, and found that 639ha was BMV. Of this, 467ha BMV land is proposed for Solar PV areas and 12.1ha BMV is proposed for base areas for fixed equipment (in particular power conversion unit systems), the internal access tracks, and the BESS compound (i.e. soils disturbed for the operational lifetime of the project).<br>The areas of temporary construction compounds have not been measured as the ES notes impacts are temporary (15.7.19). Natural England advise that without appropriate soil management, these impacts could be permanent. | NE's advice to the ExA is that without appropriate soil management, temporary construction compound impacts could become permanent.<br><br>The Applicant agrees with NE that without appropriate soil management there is the potential for a permanent adverse impact on land quality, possibly resulting in land grade downgrading, but the restored land would still be capable of agricultural use, and accordingly there would be no land-use change.<br><br>Section 7 of the **Outline Soil Management Plan (oSMP) [APP-132]** sets out good practice for the stripping of soils, temporary storage of soils and replacement of soils for temporary construction compound areas. The Applicant agrees with NE that appropriate soil management is required, and this can be controlled through the SMP, secured by Requirement 11 (SMP) of the **dDCO [APP-041]**. |
| RR-054/5 | Soil Management | Natural England note the commitment to produce a Soil Management Plan, and welcome the principles set out in the oSMP, including separate soil handling methodologies for each element of the development (oSMP sections 7-12). Each element | NE's comments are noted and welcomed. The handling of soils in sub-optimal conditions should be avoided wherever possible and, if any works is needed in the winter period, appropriate soil testing will be carried out, secured by Requirement 11 (SMP) of the **dDCO [APP-041]**. |

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| | | of the proposal may have a differing effect on the soil resource and must be managed appropriately.<br><br>Of particular note, the oSMP discusses working in the wetter winter period. It is welcomed that winter working is to be avoided where possible, with works only occurring when soils are in a suitable condition. It is Natural England's advice that soils should only be handled when they are dry and friable. Whilst the oSMP does not entirely prohibit works in the winter period, Natural England welcome the requirement for soil testing before working in this period – in line with the Institute of Quarrying Field Tests for Soil Suitability; oSMP paragraph 6.5 includes stop conditions where conditions are not suitable for soil handling. | |
| RR-054/6 | Soil Reinstatement | ES paragraph 15.11.6 notes mitigation is possible to ensure land is restored to a 'comparable quality' (i.e. ALC grade, in line with relevant guidance as discussed at ES paragraph 15.2.5). ES Chapter 15 discusses restoration of all elements of the proposals in various locations, and it is in the oSMP that the commitment is made clear that: 'The objective is to remove panels and restore all fixed infrastructure areas to return the land to the same ALC grade and condition as it was when the construction phase commenced.' (oSMP Paragraph 14.2).<br><br>This is essential to allow consideration of a loss of BMV land to be temporary and is in line with NPS EN-5 paragraph 2.9.25. Whilst the intent to restore all areas to the same quality is clear, it is noted that this paragraph (oSMP Paragraph 14.2) refers | NE comment that the Applicant should commit to restoring all temporary construction areas to comparable ALC and this should be made clear in the **oSMP [APP-132]**. The Applicant agrees. An amended **oSMP** will be produced to ensure that this is clarified. |

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| | | specifically to reinstatement following decommissioning. Natural England recommend that a similar commitment should be made clear within the oSMP that all land disturbed temporarily during construction (Access tracks, construction compounds, cable routes etc) is also restored to the same ALC grade, informed by the ALC survey. | |
| RR-054-7 | Monitoring & Research | At this stage, no soil monitoring or research is proposed through the project.<br><br>Monitoring would enable any adverse soil conditions arising during the operational phase to be identified and rectified. In addition, the long-term effects of solar development on overall soil health are not yet fully understood. Whilst similarities are expected to the benefits provided to soil health by arable reversion, the effect of solar panels on this could be better understood with further monitoring & research over the longer term.<br><br>There is also little evidence & understanding around the application of alternative solar technologies in England. Large scale solar proposals offer the opportunity to develop understanding & push forward the implementation of new, multi-benefit technologies & management practices. | Natural England's comments are noted. The Applicant will engage with NE to seek to clarify what soil monitoring or research they consider may be helpful. |
| RR-054/8 | Connecting People with Nature | ES Figure 3.3 (Public Rights of Way Plan) shows the significant number of Public Rights of Way (PRoW) in and around the order limits. Natural England welcome the inclusion of Appendix 6.6 (Assessment of Public Rights of Way) and oCTMP. | The Applicant notes this comment and that Natural England welcomes the Public Right of Way (PRoW) assessments as well as a commitment to retain all routes in the **Order Limits [APP-009]** during the operation period, and to create two permissive paths |

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| | | Section 7 (PRoW Management Plan) (Appendix 13.2). Whilst Natural England have no specific comment regarding the mitigation measures proposed, the principles of the PRoW Management Plan are welcomed.<br><br>The PRoW Management Plan also sets out the commitment to retain all routes within the order limits for the full operational period, as well as the creation of two additional permissive footpaths, which is also welcomed. | within the Order limits. Requirement 13 of the **dDCO [APP-041]** sets out specific elements that must be included in the PROW Management Plan Separately, Requirement 18 (Permissive Path) of the **dDCO [APP-041]** sets out the process of securing the committed permissive paths. |

## Table 2-16: Network Rail

| ID | Theme | Verbatim Comment | Response |
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| RR-043/1 | Land | This is the section 56 representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of Steeple Solar Farm Limited's (the Promoter) application for a development consent order (the Order) for the construction of the Steeple Renewables Project (the Scheme). Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain (the Railway). The Order sought by the Promoter includes development consent for the construction of a Solar Farm located in Nottinghamshire comprising approximately 450MW of solar energy generation and approximately 150MW Battery Energy Storage System (BESS). The project includes construction, operation and maintenance and decommissioning of the Steeple Renewables Project, including associated development. The Promoter seeks authority and powers in the draft Order to: a) permanently acquire rights over land in the ownership and occupation of Network Rail; b) permanently acquire rights over land in which Network Rail is an occupier in respect of rights. as summarised below:<br><br>1. Rights in respect of beneficiary of title NT353866 - Permanent acquisition of new rights 5010.38 square metres of private road (Wood Lane) and restricted byway (Sturton Le Steeple RB30), adjoining public highway (Wheatley Road), Sturton Le Steeple, Retford (Plot 2-016); | The Applicant notes this comment made by Network Rail in relation to the protection of their asset. The Applicant is in continuing discussions with Network Rail regarding a bespoke set of protective provisions, to be included in the DCO, and a side agreement for the protection of Network Rail. The Applicant considers that agreement will be reached during examination. |

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| | | 2. Freehold Owner and Occupier in respect of railway line Sheffield to Lincoln - Permanent acquisition of new rights 10701.58 square metres of land being railway line (Sheffield to Lincoln line), Sturton Le Steeple, Retford (Plot 2-022);<br>3. Freehold Owner and Occupier in respect of railway line Sheffield to Lincoln - Permanent acquisition of new rights 343.41 square metres of land being public highway (Wheatley Road), trees, verge and bridge structure over railway line (Plot 2-024);<br>4. Freehold Owner and Occupier in respect of railway line Sheffield to Lincoln - Permanent acquisition of new rights 15198.78 square metres of land being railway line (Sheffield to Lincoln line), trees and shrubbery, east of Maumhill Wood, Sturton le Steeple, Retford (Plot 3-009);<br>5. Freehold Owner and Occupier in respect of mines and minerals - Permanent acquisition of new rights 51.50 square metres of land being part of an access track (Rose Street), adjoining public highway (Gainsborough Road), Sturton Le Steeple, Retford (Plot 5-005);<br>6. Freehold Owner and Occupier in respect of mines and minerals - Permanent acquisition of new rights 1005.15 square metres of land being part of an access track (Rose Street), north of Gainsborough Road, Sturton Le Steeple, Retford (Plot 5-006);<br>7. Freehold Owner and Occupier in respect of mines and minerals - Permanent acquisition of new rights 2934.72 square metres of land being part of an access track (Rose Street), trees, verge, east of public highway (Gainsborough Road), Sturton Le Steeple, Retford (Plot 5-007); | |

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| | | 8. Freehold Owner and Occupier in respect of mines and minerals - Permanent acquisition of new rights 63521.25 square metres of land being part of West Burton power station, buildings, pylons, overhead electricity cables, handstanding, hedges, shrubbery, unnamed drain and private right of way (South Road), east of public highway (Gainsborough Road), Sturton Le Steeple, Retford (Plot 5-010);<br>9. Freehold Owner and Occupier in respect of mines and minerals - Permanent acquisition of new rights over 41322.59 square metres of land being part of West Burton power station, buildings, pylons, overhead electricity cables, east of public highway (Gainsborough Road), Sturton le Steeple, Retford (Plot 5-012);<br>10. Freehold Owner and Occupier in respect of mines and minerals - Permanent acquisition of new rights over 38.28 square metres of land at West Burton substation, grassland, adjoining unnamed private access track and east of public highway (Gainsborough Road), Sturton le Steeple, Retford (Plot 5-017); and<br>11. Freehold Owner and Occupier in respect of mines and minerals - Permanent acquisition of new rights over 2230.91 square metres of land being part of West Burton power station, buildings, apparatus, pylons, overhead electricity cables, east of public highway (Gainsborough Road), Sturton le Steeple, Retford (Plot 5-019). | |
| RR-043/2 | Assets | Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the operation of the Railway and that the | |

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| | | safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Scheme. | |
| RR-043/3 | Assets / Land | As the Promoter proposes to compulsorily acquire new rights over railway land as well in close proximity to railway assets, Network Rail hereby objects to the making of the Order in principle on the ground that the powers sought are likely to interfere with the safe and efficient operation of the Railway and cause a serious detriment to the carrying on of Network Rail's statutory undertaking. | |
| RR-043/4 | DCO / Protective provisions | In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions to be included within the Order (and for the avoidance of doubt Network Rail require these Protective Provisions to be in the form set out at Appendix 1 to this Relevant Representation) and an agreement with the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway.<br>Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order. | |
| RR-043/5 | Assets | Network Rail hereby requests that the Examining Authority treats Network Rail as an Interested Party for the purposes of the Examination and Network Rail reserves the right to produce | |

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| | | additional and further grounds of concern when further details of the Scheme and its effects on Network Rail's assets are available. | |

## Table 2-17: National Grid Energy Distribution

| ID | Theme | Verbatim Comment | Response |
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| RR-011/1 | General | 1. Project Reference: EN010163. Relevant Representation submitted by Osborne Clarke LLP on behalf of National Grid Electricity Distribution (East Midlands) plc ("NGED").<br>2. Osborne Clarke LLP act for NGED whose registered office is at Avonbank, Feeder Road, Bristol, BS2 0TB. NGED is the licensed distribution network operator under Section 6 Electricity Act 1989 (the "EA 1989") for the area in which the Steeple Renewables Development Consent Order 202* (the "Order") is proposed to have effect. Section 9 of the EA 1989 places a duty on NGED as the electricity distributor to develop and maintain an efficient, co-ordinated and economical system of electricity distribution.<br>3. The application was received by the Planning Inspectorate on 14 May 2025 and accepted on 11 June 2025. | The Applicant and National Grid Electricity Distribution are currently negotiating the protective provisions for the benefit of National Grid Electricity Distribution that are set out in **dDCO [APP-041].** The Applicant is confident that agreement can be reached with National Grid Electricity Distribution prior to the close of the Examination. |

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| RR-011/2 | Land / Assets/ Protective Provisions | 4. The application includes land in or upon which NGED may have assets and which may include (but are not limited to) high voltage electricity cables. NGED is currently reviewing the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are affected.<br>5. While NGED will continue to seek to have positive engagement with the applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under the EA 1989. This includes ensuring acceptable terms of any proposed protective provisions.`<br>6. NGED is therefore making this representation as a holding objection to the application until an asset protection arrangement has been agreed between the parties. No formal agreement has yet been concluded and accordingly we are lodging this representation to protect NGED's position pending conclusion of an appropriate agreement. Once NGED is satisfied that its network is protected, we will notify the Planning Inspectorate promptly and withdraw the objection. | |

## Table 2-18: National Grid Energy Transmission

| ID | Theme | Verbatim Comment | Response |
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| RR-049/1 | Intro | Introduction<br>This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("NGET") in respect of Steeple Solar Farm Limited ("Applicant") application for the Order to authorise the Steeple Renewables Project ("Project"), and in particular NGET's existing and proposed infrastructure and land interests which will be located within and in close proximity to the proposed limits of the Order boundaries ("Order Limits"). | The Applicant notes this comment. |
| RR-049/2 | Land | The Project<br>The Project comprises the proposed construction, operation and maintenance of a solar farm and BESS (Battery Operated Storage System) and transporting the power via underground high voltage cabling to NGET's existing West Burton 400kV Substation (as defined below).<br><br>The Applicant is seeking to secure through the exercise of compulsory powers in the Order temporary rights and permanent interests in land over several plots containing NGET existing infrastructure, including parcels 04/05, 04/07, 05/03, 05/04, 05/06, 05/07, 05/09, 05/10, 05/11, 05/12, 05/13, 05/14, 05,16, 05/17, 05/21, 05/23, 05/24, 05/26, 05/29, 06/03, 06/05, 06/06, 06/09, 06/10, 06/16, 06/17 and 06/21 of the Land Plans in order to carry out the works referenced in Schedule 1 to the draft Order as Work Numbers 4, 5, 6, 6A, 7, and 8. | In respect of NGET existing assets including those in parcels 04/05, 04/07, 05/03, 05/04, 05/06, 05/07, 05/09, 05/10, 05/11, 05/12, 05/13, 05/14, 05,16, 05/17, 05/21, 05/23, 05/24, 05/26, 05/29, 06/03, 06/05, 06/06, 06/09, 06/10, 06/16, 06/17 and 06/21 of the Land Plans the Applicant is negotiating protective provisions with NGET to ensure that its statutory undertaking is not subject to serious detriment as a result of the Proposed Development. Draft protective provisions are included in **Document 3.1 dDCO [APP-041]** which includes rights of access for NGET to inspect, maintain, renew and repair any apparatus that interfaces with the Proposed Development and which can be developed further with NGET subject to specific areas of concern that may be raised. The Applicant is confident that agreement can be reached with prior to the close of the Examination. |

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| RR-049/3 | DCO | As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. Additionally, NGET must protect its future proposed infrastructure.<br><br>NGET's rights of access to inspect, maintain, renew and repair such apparatus must, therefore, be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection in order to safeguard its ability to deliver its statutory undertaking. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights. | The Applicant notes this comment and deals separately with NGET's wish to protect its future proposed infrastructure below. |
| RR-049/4 | DCO | NGET is proposing to build the North Humber to High Marnham Project ("NHHM Project" ) – a new high voltage electricity transmission line and associated works between a new substation to be built near Creyke Beck, known as Birkhill Wood Substation and a new substation to be built at High Marnham in Nottinghamshire. NHHM is required to increase the capability of the electricity transmission network between the north of England and the Midlands as part of the Great Grid Upgrade. It is also needed to facilitate | The NHHM Project is not part of the NGET grid infrastructure to which the Steeple Project will connect and is still in its pre-application design stage. The Applicant has outlined in ISH1 how the design iterations of the NHHM project to date have involved route corridors further to the west that would have less impact on the Steeple Project than the route that has been used for the NHHM recent statutory consultation. The |

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| | | the connection of proposed new electricity generation. Further explanation of the NHHM Project is set out later in this representation.<br><br>NGET will require appropriate protection for retained and proposed apparatus, including compliance with relevant standards for works proposed within close proximity of such apparatus. NGET objects to the Order as applied for as it did not include suitable protective provisions for the benefit of existing and future NGET assets, NGET will require agreement of an appropriate and robust set of protective provisions and will continue to engage with the Applicant regarding this. | Applicant maintains that the NHHM route should be moved further to the west to reduce these impacts. Negotiation of protective provisions relating to the NHHM Project are in progress however the Applicant contends that these should be on a different basis to those that will apply to existing NGET assets, to reflect the uncertainties inherent in a project that is still in a formative stage.<br><br>Any protective provisions have to be read in the context of the specific assets to which they relate and so any that would relate to the NHHM Project also depend upon the route of the NHHM OHL that is to be pursued by NGET. |
| RR-049/5 | Assets | Existing NGET infrastructure within/in close proximity to the Order Limits<br>NGET owns and operates 1 x 400kVA substation and multiple 400kV overhead lines that are located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows:<br><br>• West Burton 400kVA Substation • 4ZM 400kV OHL – BICKER FEN - SPALDING NORTH - WEST BURTON • 4ZM 400kV OHL - BICKER FEN - WALPOLE - WEST BURTON • 4DA 400kV OHL – COTTAM - WEST BURTON • 4DA 400kV OHL - HIGH MARNHAM | The Applicant notes this comment and refers NGET to the response above regarding protective provisions in relation to access to existing assets. |

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| | | - WEST BURTON • 4VE 400kV OHL – COTTAM – KEADBY 1 • 4VE 400kV OHL - COTTAM - KEADBY 2 • WBUR4X10K1- HIGH MARNHAM 400KV CABLE A • WBUR4X10K2- HIGH MARNHAM 400KV CABLE B | |
| RR-049/6 | Assets | Future NGET infrastructure within / in close proximity to the proposed Order limits:<br><br>As explained above, the proposed Order limits overlap with land required for the following future NGET infrastructure project which is required for future generation connections (subject to obtaining the necessary consents and land rights):<br><br>• Construction of a new 400kV high voltage electricity transmission line between the new Birkhill Wood Substation in the East Riding of Yorkshire and a new substation a High Marnham in Nottinghamshire (known as the North Humber to High Marnham project) ("NHHM Project"). | The Applicant notes this comment and refers NGET to the response above regarding protective provisions and routing in relation to the proposed NHHM project. |
| RR-049/7 | Assets | North Humber to High Marnham Project<br>The NHHM Project is a Nationally Significant Infrastructure Project ("NSIP") which is required to reinforce the electricity transmission network between the north of England and the Midlands. The design life of the Project is a minimum of 80 years but with regular maintenance is likely to extend beyond this. | The Applicant notes the description of the NHHM Project, the proposed timeline for construction and the consultation undertaken so far.<br><br>The Applicant has consistently engaged with that NHHM consultation process and been clear at all times upon the need for the NHHM to follow a route to the west of the railway line that would minimise overlap with the |

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| | | The NHHM Project is required to increase the capability of the electricity transmission network between the north of England and the Midlands as part of the Great Grid Upgrade. The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, and comprises 17 major infrastructure projects that will both scale up the grid and update NGET's existing networks, enabling the electricity grid to carry more clean, secure energy from where its generated to where it's needed. NGET's infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses and crucially, contribute to the Government's drive to achieve net zero by 2050. The NHHM Project is at an advanced stage of the pre-application process having completed statutory consultation on the project proposals. In addition to ongoing consultation with affected parties and stakeholders, a summary of previous formal consultation activities undertaken for the NHHM Project is set out below:<br>• Non-statutory consultation between 1 June to 27 July 2023. • EIA Scoping Opinion received in September 2023.<br>• Localised non-statutory consultation between 9 July and 6 August 2024.<br>• Statutory consultation between 18 February and 15 April 2025. Detailed routeing and siting studies have been undertaken to inform development of the proposed route for NHHM, with refinements | proposed Steeple Renewables Project. The Applicant remains of that view.<br>There are no outstanding requests from NGET for shapefile data on the Steeple Project and those that have been made were responded to in a timely manner.<br>As part of the negotiations ongoing between the Applicant and NGET a Statement of Common Ground will be sought to be agreed. |

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| | | continuing to be made following conclusion of the statutory consultation process and review of consultation feedback.<br>In November 2023, NGET contacted the Applicant to request a meeting to discuss potential interactions with the Project.<br><br>NGET has since continued to engage with the Applicant which has included initial meetings to understand the scale of the interaction between the two projects and their respective programmes, briefings ahead of localised non-statutory and statutory consultations for NHHM as well as a meeting to further clarify the concerns raised by the Applicant in their statutory consultation response to NHHM. A schedule of engagement has been attached as Appendix A to facilitate drafting of a SOCG. Additionally, NGET has been engaging directly with the owner of the land (and their agent) on which both the Project and NHHM are proposed. This engagement has been ongoing since May 2023 and has included discussions on survey access and design development. The Project, if consented, will have a number of extensive interactions with NHHM within route section 10, both temporarily during construction and permanently during operation. These interactions are summarised below and shown on the Figure provided in Appendix B<br>• 8 proposed pylons from 4AF212 to 4AF219<br>• Proposed overhead line Limits of Deviation | |

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| | | • Pylon working areas (4AF212 to 4AF219) • Conductor stringing positions<br>• Access works<br>• Crossing protection It is understood from the meeting held with the Applicant on 29th May 2025 that the draft order limits for NHHM which were presented as part of NGET's statutory consultation interact with the solar PV array, temporary construction compound, access tracks, site entrance visibility splay and perimeter fencing.<br><br>NGET has requested shapefiles of the proposed site layout for the Project in order to better understand the specific locations where there is an interaction / overlap with the NHHM Project. At the time of writing, the Applicant has not responded to NGET's request. It is noted that the construction timelines of both projects will overlap with the NHHM construction period, which is currently programmed to commence in 2028 (if approval granted) and is to be fully operational from 2031. It is understood that the Applicant is expected to commence construction in 2027 (if approval is granted) with an expected construction period of 24 months. NGET objects to the Order as applied for and requests that the Applicant engages in discussions with NGET regarding suitable protective provisions and interface arrangements in order to facilitate the delivery and co-existence of both projects. Furthermore, NGET would welcome the | |

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| | | opportunity to enter into a Statement of Common Ground with the Applicant. | |
| RR-049/8 | DCO | Protection of NGET Assets<br>As stated above, in light of the above interactions with the Project and existing and future NGET assets, NGET require appropriate protective provisions to be included within the DCO to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards. The Awel Y Mor Development Consent Order ("AYM DCO") and the recently granted Mona Offshore Wind Development Consent Order ("Mona DCO") provide precedents for the protection of NGET future assets via protective provisions. The protective provisions secured in the AYM DCO ensured the protection of existing and future NGET infrastructure at the Bodelywddan substation. This was because NGET was bringing forward a project to upgrade the existing Bodelwyddan substation comprising extending the substation itself as well as associated overhead line works to the south of the existing substation to enable the connection of multiple NGET customer projects in this location. The AYM DCO project was just one of the connecting projects and therefore specific protective provisions were included in the AYM DCO to avoid those future NGET works from being prejudiced by the AYM DCO project. As such, NGET seeks a form of protective provisions based on those included in the AYM DCO and the recently granted Mona DCO. | The Applicant refers NGET to the response above regarding protective provisions and routing in relation to the proposed NHHM project.<br><br>References to the AYM and Mona DCOs and the protective provisions within them are of limited assistance to the facts applying at the proposed Steeple Renewables Project. In both AYM and Mona DCOs the protective provisions in question related to upgrades to the Bodelwyddan substation that were required in order for the AYM and Mona projects themselves to be connected to the grid. In neither case did the accommodation required within the AYM and Mona works have any impact on the generating capacity of those offshore windfarms.<br><br>In marked contrast, at the proposed Steeple Renewables Project the NHHM OHL is not required to connect the solar development to the grid and the accommodation sought in NHHM's favour, particularly along the alignment sought by NGET, creates the potential for a substantial reduction in the generating capacity of the proposed Steeple Renewables Project. |

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| | | Noting that the Order as applied for did not include suitable protective provisions for the benefit of NGET. NGET has therefore enclosed with this Representation its standard protective provisions together with the precedent wording for the protection of NGET future assets. NGET is liaising with the Applicant in relation to the protective provisions.<br>NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for existing and future NGET assets, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions. | The Applicant also contends that when reference is made to protective provisions agreed by applicants in other DCO situations, the full effect of those particular provisions cannot be understood if they were accompanied by a confidential side agreement between the parties. As NGET would inevitably be a party to such an agreement, although it may not have power to unilaterally waive confidentiality over the terms involved, if it wishes weight to be attached to any previously agreed set of protective provisions in its favour it should state whether a side agreement also exists in relation to the operation of those provisions or it should state whether it is unable to comment on the existence of such an agreement. |

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| RR-049/9 | DCO | Compulsory Acquisition Powers in respect of the Project<br>As noted above, the Order seeks powers to take temporary possession of and compulsorily acquire rights and interests in NGET operational land. In order to safeguard NGET's ability to deliver its statutory undertaking and licence obligations, it is critical that NGET's consent is a precondition to any such land being occupied, or any such interest or right being acquired. NGET's protective provisions, which it requires to be included in the Order, will include provision for such consent. In the absence of appropriate provisions for the protection of NGET, its ability to deliver its statutory duties will be severely compromised.<br><br>NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with its existing and future assets but in the meantime will continue to liaise with the Applicant with a view to reaching an agreed position. | The Applicant notes this comment and that it relates to interests in NGET operational land. The Applicant contends that similar considerations apply to controls on compulsory acquisition of NGET land as they do to protection of NGET assets and accordingly refers NGET to the response above regarding protective provisions in relation to existing NGET assets and separately in relation to the proposed NHHM project and its potential alignment. |

## Table 2-19: Trent Valley Internal Drainage Board

| ID | Theme | Verbatim Comment | Response |
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| RR-021/1 | Drainage and Watercourses | Byelaw Number 3 states that:<br>No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended ("the 1990 Act")) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water in any watercourse in the District (without the previous consent of the Board)."<br><br>Consent will only be granted for the increase in flow to a watercourse where the Board is happy that in doing so no demonstrable harm will be caused. It may be the case that appropriate mitigations are required to be put in place to either attenuate flow or to enhance the existing watercourse to ensure no detriment. If this is not possible alternative outfall locations. | The IDB Byelaws were taken into account in the development of the development layout and the Surface Water Drainage Strategy. As described in the **Surface Water Drainage Strategy [APP-120]** and discussed during pre-application consultation with the IDB, there will be no increase in flow to a Board watercourse. The Applicant is in the course of negotiation with the IDB regarding bespoke protective provisions relating to the IDB's statutory undertaking. |
| RR-021/2 | Drainage and Watercourses | Byelaw Number 10 states that:<br>No person without the previous consent of the Board shall erect any building or structure, whether temporary or permanent, or plant any tree, shrub, willow or other similar growth within nine metres of the landward toe of the bank where there is an embankment or wall or within nine metres of the top of the batter where there is no embankment or wall, or where the | The required 9m offset has been taken into account within the development layout. All infrastructure will be located outside of this offset. |

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| | | watercourse is enclosed within nine metres of the enclosing structure.<br>This will relate primarily to the location of the arrays, compounds and transformer stations. | |
| RR-021/3 | Drainage and Watercourses | Byelaw number 17 states that:<br>No person shall without the previous consent of the Board -<br>(a) place or affix or cause or permit to be placed or affixed any gas or water main or any pipe or appliance whatsoever or any electrical main or cable or wire in, under or over any watercourse or in, over or through any bank of any watercourse;<br>(b) cut, pare, damage or remove or cause or permit to be cut, pared, damaged or removed any turf forming part of any bank of any watercourse, or dig for or remove or cause or permit to be dug for or removed any stone, gravel, clay, earth, timber or other material whatsoever forming part of any bank of any watercourse or do or cause or permit to be done anything in, to or upon such bank or any land adjoining such bank of such a nature as to cause damage to or endanger the stability of the bank;<br>(c) make or cut or cause or permit to be made or cut any excavation or any tunnel or any drain, culvert or other passage for water in, into or out of any watercourse or in or through any bank of any watercourse;<br>(d) erect or construct or cause or permit to be erected or constructed any fence, post, pylon, wall, wharf, jetty, | The Applicant is in the course of negotiation with the IDB regarding bespoke protective provisions relating to the IDB's statutory undertaking. The Applicant will seek to agree a statement of common ground with the IDB demonstrating that the parties are aligned and in agreement. |

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| | | pier, quay, bridge, loading stage, piling, groyne, revetment or any other building or structure whatsoever in, over or across any watercourse or in or on any bank thereof;<br>(e) place or fix or cause or permit to be placed or fixed any engine or mechanical contrivance whatsoever in, under or over any watercourse or in, over or on any bank of any watercourse in such a manner or for such length of time as to cause damage to the watercourse or banks thereof or obstruct the flow of water in, into or out of such watercourse.<br><br>Provided that this Byelaw shall not apply to any temporary work executed in an emergency but a person executing any work so excepted shall, as soon as practicable, inform the Board in writing of the execution and of the circumstances in which it was executed and comply with any reasonable directions the Board may give with regard thereto.<br><br>The Board will require all watercourses to be crossed by means of HDD (or other suitable trenchless technology) at a depth no less than 2 metres PLUS the cable safety distance below the hard bed level of all watercourses (to ODN if EA or IDB maintained). This will allow the IDBs to have the flexibility to improve watercourses in the future due to climate change (works will include deepening & widening of watercourses). | |

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| | | It is anticipated that the above requirements would be covered by SOCGs, MOU, and via Protective Provisions within the DCO. This matter should be discussed further and in more detail as the proposed cable route is refined.<br><br>Any culverting or other works within the bed of any riparian watercourse within the Board's district be they temporary or permanent will also require consent.<br><br>It should be noted that the Board's consent is required irrespective of any permission gained under the Town and Country Planning Act 1990. The Board's consent will only be granted where proposals are not detrimental to the flow or stability of the watercourse/ culvert or the Board's machinery access to the watercourse/ culvert which is required for annual maintenance, periodic improvement and emergency works.<br>I hope that the above is of assistance and I look forward to further ongoing detailed discussions with regard to the proposal. | |

## Table 2-20 Leep Utilities

| ID | Theme | Verbatim Comment | Response |
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| RR-016 | Project Interactions | With potential assets being acquired in the surrounding area, we want to be informed of plans to understand what impact this may have on our organisation | The Applicant notes this comment. |

## 2.3. Non-statutory organisations and businesses

2.3.1. The table below set out the responses to the Relevant Representations from non-statutory organisations and the response from the Applicant.

### Table 2-21: North Leverton Windmill Charitable Trust

| ID | Theme | Verbatim Comment | Response |
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| RR-002/1 | Heritage | The Applicant has failed to accurately describe North Leverton Windmill, a heritage asset (National Importance and Grade 2* listed) and totally ignored its position as an important tourist attraction and has given no consideration to the visual impact that the project will have on the views from the windmill tower. The Windmill holds Best Tourist Attraction in North Nottinghamshire as voted for by the public. We have 1000's of visitors throughout the year and almost all climb the tower and look out of the windows (the views of the fields to the North will be almost all covered in solar panels). In addition the views from Retford Road (a popular photo spot) of the windmill will have almost all the backdrop being solar panels. The project will most likely have an adverse impact on the windmill and thus its sustainability. This also has potential to impact on other businesses that benefit from the tourist numbers the windmill attracts. The developer has failed to engage with the Trust and it was the trustees that invited them to visit the Windmill and see the actual impact towards the end of the consultation period - no feedback has been given and the EIA still does not refer to tourism nor any visual / economic impact | The Applicant is uncertain in what way the North Leverton Windmill has been inaccurately described, with the description provided in **Appendix 9.1 Cultural Heritage Technical Baseline [APP-122]**. having come from Historic England's Listing description and informed by visiting the asset. With regards to the argument that the Proposed Development would impact on tourism and the sustainability of the Mill – we have not been presented with any evidence to suggest that the Proposed Development would result in any reduction in tourist numbers.<br><br>**ES Chapter 10: Socio-Economics [APP-068]** concludes during both the construction and decommissioning phases of the Proposed Development there would be a significant medium and major beneficial effects upon the local accommodation sector through employment and accommodation stock. Whilst not directly related on the Windmill, this points to a wider picture of beneficial impact in related sectors.<br><br>Whilst the continued use of this Mill is part of its significance, the Proposed Development will not have any impact upon this – and as such, it is considered that the elements that a visitor |

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| | | | experiences and appreciates when visiting the Mill (the historic fabric, the moving sails, the ability to purchase flour milled here and its immediate agricultural surroundings) will not change to such an extent that this is a cause of harm to significance. With regard to the assertion that there was a failure to engage, it should be noted that the Applicant did visit the Windmill with the owners at their request on Friday 7th March 2025.<br><br>With regard to views, both to and from the asset, these, and their relationship to the significance of the asset have been considered within the **ES Chapter 9: Cultural Heritage [APP-067])** and **Cultural Heritage Technical Baseline (Appendix 9.1, [APP-122])**, and it is noted that *"Although the height of the asset is an important feature, this is a result of the function of the building and a practical design. Longer distance views from the asset are considered to be incidental rather than by any design intent. The small windows are placed to allow light to enter the mill, rather than to provide any particular views."* |

## Table 2-22: Nottinghamshire Wildlife Trust

| ID | Theme | Verbatim Comment | Response |
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| RR-055/1 | Ecology and Biodiversity | The Environmental Statement (ES) chapter summarises the baseline biodiversity interest of the Site and biodiversity features within the Proposed Development's Zone of Influence (ZoI) based on information available at the time of writing. It also provides an assessment of the potential effects of the proposed development during construction, operation and decommissioning in relation to Ecology and Biodiversity. It assesses the likely significant effects on ecology arising from the proposed development and considers measures to minimise these to determine the likely significance of the residual biodiversity effects of the Proposed Development. We are satisfied that the baseline is evaluated in accordance with industry guidance. | The Applicant has noted that Nottinghamshire Wildlife Trust (NWT) is satisfied that the baseline ecology has been evaluated according to industry guidance. |
| RR-055/2 | Ecology and Biodiversity | Great Crested Newt we note that access permission could not be gained for four waterbodies and the status of great crested newt at these ponds is unknown. On a precautionary basis, as they are mobile species, the possibility of presence in localised areas of the site around Ponds 15 and 18 should be considered and appropriate mitigation implemented. | Paragraph 7.8.196 of **ES Chapter 7 – Ecology and Biodiversity [APP-065]** provides information about Ponds 15 and 18, demonstrating that it is unlikely impacts to great crested newts will be generated by the Proposed Development as a result of the distance between the ponds and any planned ground disturbance. Nonetheless, additional precautionary measures are set out in the **Outline Construction Environmental Management Plan [APP-089]** for undertaking updated great crested newt surveys prior to construction, and precautionary checks for amphibians should any clearance of suitable vegetation within 250 m of Ponds 15 and 18 become required. These are precautionary measures only. These precautionary |

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| | | | measures will be secured by Requirement 7, which ensures a CEMP must be in place prior to construction, and that it must be in accordance with the outline CEMP and must contain details regarding pre-construction surveys. |
| RR-055/3 | Ecology and Biodiversity | We note that section 7.8.158 states 'The Proposed Development has sought to retain all setts within appropriate buffers, with the intention of fully protecting them during construction. There will be no loss of any identified badger setts at the Site.' However, section 7.8.165 states 'The majority of badger setts at the Site are retained and protected by appropriate habitat buffers. Where potential impacts to a badger sett are unavoidable during construction or decommissioning phases, and risk to the sett cannot be controlled by precautionary methods of working, those setts will be temporarily closed under a Natural England badger development licence for the duration of the construction works' These statements appear to be contradictory and so clarity should be sought on the strategy for badger setts within and adjacent to the site. | Section 7.8.165 of **ES Chapter 7 – Ecology and Biodiversity [APP-065]** is considered to be accurate and the previous section 7.8.158 is superseded – some badger setts may be closed (under licence) to protect badgers from possible injury but the need for this will depend on the detailed design of the Proposed Development, and the status of each sett at the time (which will be determined through updated badger survey work). The Applicant will update the ES accordingly during the examination. Avoidance zones have been built into the design and adhered to in almost all cases (a total of 80 sett features have been recorded). No infrastructure will be placed directly over a sett; however, based on the current designs and distribution of badger activity, a number of sett protection areas (i.e. avoidance buffers) cannot be wholly avoided and will require further mitigation measures. The scale of the interactions are anticipated to change based on the mobile nature of badgers and their ability to create new setts over time, but also as a result of avoidance measures that will be incorporated during the detailed design of the Proposed Development (such a micro-siting fence lines or using no-dig techniques). Currently predicted interactions between badger protection areas and proposed infrastructure include:<br>• One main sett (sett[redacted]) where an existing farm track will be modified to accommodate construction traffic |

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| | | | within 30m of the sett. The degree of groundworks needed will be assessed prior to construction and minimised where possible. Otherwise, further mitigation such as closing the sett under licence and providing a compensatory setts will be provided.<br>• Two subsidiary setts ([redacted]) will have fencing installed 23 m and 24 m from the sett entrances respectively. Further assessment of the tunnel directions and local topography will be undertaken to determine the risk to these setts and whether any further mitigation is required.<br><br>13 outlier sett protection areas may clash with infrastructure - 6 of these are attributed to cable corridors, which have not yet been designed in detail, and which may be possible to microsite away from badger setts. The remaining outlier setts potentially clash with security fencing, and these will be considered further following updated survey and consideration of detailed fencing options to minimise the need to close any of these outliers.<br>We are currently liaising with Natural England, and a draft badger licence application will be submitted to Natural England. The draft licence application will include an outline badger method statement [in preparation], that will include realistic worst-case mitigation measures to protect badgers. |
| RR-055/4 | Ecology/breeding barn owls | The Environmental Statement assumes that at least two pair of breeding barn owls are within the site. barn owls can be sensitive to disturbance at the nest site, particularly early in the nesting | All ecology mitigation buffers will be clearly defined within the final CEMP, as indicated in Table 3.3. of the **Outline CEMP [APP-089].** The buffers will be marked on the ground during the |

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| | | cycle. Disturbance from construction activity may affect this species. A buffer would need to be established around nesting locations to avoid disturbance. Appendix 1: Table 7. 6 - Buffer zones and stand-off distances from ecological features doesn't provide a figure for a minimum semi-natural habitat buffer. The table does state however, that the buffer would need to consider the type of development feature to be installed (solar arrays, access roads, battery storage etc) as some are likely to generate greater levels of disturbance than others. We refer the applicant to NatureScot Research Report 1283 - Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species (2022) * that supports that approach. The report recommends a breeding season buffer zone of 50-100m and a non-breeding season buffer zone of ≥50m. Our concern with that approach is that varied buffer zones depending on construction activity could lead to contractor confusion. Details of buffer zones should be clearly documented in the CEMP to avoid confusion arising. | relevant stages of construction to avoid confusion – the **Outline CEMP [APP-089]** (Table 3.3 'Barn Owl') specifies that barn owl buffers will be determined by an ecologist and demarked with protective fencing. Relevant site personnel will also have briefings with the Ecologist who will work alongside the contractors as required. Notwithstanding this, the approach needs to remain dynamic when dealing with any mobile species with multiple roosting sites. Therefore, any plans produced in the final CEMP will need to remain under review and may be subject to change which will be communicated to all relevant site personnel (based on monitoring findings). The intention of this dynamic approach is to ensure that all protection measures take account of the latest movement of the barn owls.<br><br>The Applicant's final CEMP will provide a detailed method statement for protecting breeding barn owls as indicated in Table 3.3 **Outline CEMP [APP-089]** (refer to 'Barn owl' row of the table). This includes a program of monitoring, plan of protection buffers (as above), timings that buffers will be in place, the type of barriers to install; and it may include details of phased blocking of potential nest sites and compensatory nesting boxes to minimise the risk of barn owls starting nests in areas that are likely to be disturbed. |
| RR-055/5 | Outline Landscape & Environmental | Outline Landscape & Environmental Management Plan We note that the final LEMP will provide details of the relevant machinery, planting plans and planting schedules etc. that are lacking in the OLEMP. We are largely supportive of the proposals, but we | The Applicant has noted this comment. The final LEMP will be provided post-consent and prior to work commencing, in line with Requirement 6 of the DCO. |

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| | Management Plan | suggest the following amendments.<br><br>Eastern Biodiversity Mitigation Area We are generally supportive of the proposed enhancement works to the Eastern Biodiversity Mitigation Area. Currently, the margins of Littleborough Lagoon are heavily grazed by sheep, which has resulted in restricted plant growth and diversity. It is stated by the applicant's ecologist that new planting and reduction of grazing will improve marginal areas and provide greater opportunities for nesting birds and aquatic invertebrates. We support that approach.<br>We note however, proposals are at an outline stage, and further details are to be provided at the DCO stage. | |
| RR-055/6 | Maintenance/Animal grazing | We would like to see the implementation of conservation grazing within the DCO area. Conservation grazing uses livestock as a management method to create a suitable sward for wildflowers and a varied sward structure, whilst keeping the welfare of the animal's paramount. So, in effect, where once grassland was there for livestock now the livestock are there for the grassland. Conservation grazing is used on Nottinghamshire Wildlife Trust nature reserves using a mixture of Hebridean Sheep, Longhorn and Lincoln Red cattle. The Trust works with other landowners by giving advice and grazing their land. It is not necessarily appropriate to apply a general management prescription to all sites, so sites need to be surveyed, and a management plan written. An important part of the management plan is monitoring of the grassland to assess the impact of the management, | The Applicant will include details of grassland grazing and monitoring in the final LEMP, as indicated in Table 2 and Table 3 of **ES Appendix 7.14 Outline Landscape Ecological Management Plan [APP-116]**.<br><br>It is intended that all areas identified to become 'Feature 1' i.e. Other neutral grassland or 'Feature 2' i.e. modified grassland in the **ES Appendix 7.14 Outline Landscape Ecological Management Plan [APP-116]** will have a degree of conservation grazing – subject to suitable grazing tenants being available – that will remain flexible as suggested by NWT. However, allowance has been made to accommodate more intensive grazing also (for areas proposed to become modified grassland in poor condition using the terminology of the Biodiversity Metric). |

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| | | particularly the grazing, to ensure that it is having the desired effect, and modifying it if necessary. | This is to allow the option for some of the land to continue to be used for agriculture and food production, without restrictions to grazing intensity, during the flowering season and over winter. |
| RR-055/7 | Maintenance/Animal grazing | Stocking density will affect how the animals' graze: if there are large numbers of animals on site, then they will graze differently than if they are more spread out. For example, they may have little choice but to move onto less palatable vegetation once they have finished using the resource in their preferred areas. The term 'livestock unit' or LU is often referred to as a way of determining what stocking density can be used on a given area of land and with what type of livestock:<br>• 1 sheep (including ewe with a suckling lamb) or goat = 0.15 LU<br>• male bovine animals and heifers older than 24 months, suckler cows, dairy cows = 1.0 LU<br>• male bovine animals and heifers from 6 months to 24 months = 0.6 LU • heifers that calve at under 24 months old count as 1.0 LU from the date of calving in some circumstances<br>• horses or ponies (6 months and over) = 1 LU So, for example, the stocking density of 10 sheep grazing on 3ha is (0.15 LU x 10 animals) / 3 ha = 0.5 LU/ha.<br>Stocking density is sometimes specified as an annual equivalent. It may be worth noting that some sites may suffer from grazing by rabbits and deer. These species can have a significant impact on a site, so do not underestimate their grazing intensity (a hind is equal to 0.3 LU therefore twice that of a sheep). | This information has been noted. |

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| RR-055/8 | Habitat Creation | We support the creation of wet woodland habitat, but we recommend removing it from the area where scrapes are proposed. Nesting wading birds such as lapwing prefer open areas to nest within because trees and other tall structures provide perching places for avian predators. Willow and alder species are appropriate species for wet woodland planting.<br>• Fenton Gorse – woodland planting is proposed adjacent to this site. We suggest that natural regeneration is considered to allow wildlife to benefit from successional habitats. We suggest that Fenton Gorse receives management to create a varied scrub structure.<br>• Peninsula creation – we support the idea in principle but negative impacts on the botanical interest of Littleborough Lagoon LWS would need to be avoided. A bund would provide foraging habitat for birds along the water's edge, a loafing area for wildfowl and a sheltered area of water with protection from prevailing wind. On going management would be necessary to retain an open aspect for the bund.<br>• Grazing – large cattle would be our preferred choice as grazing animals for this area due to them producing a more diverse sward than sheep. Historically, floodplain grasslands in this area were probably grazed by native breed cattle. Conservation grazing should be the priority over | Wet woodland had been removed from the area where scrapes are proposed (the Eastern Biodiversity mitigation Area) as a result of consultation with key stakeholders, including NWT and Nottinghamshire County Council. Currently, willow scrub is proposed around Littleborough Lagoon, this scrub is to augment the existing scattered hawthorn and alder growth, and provide cover and windbreaks for waterfowl and otters, and is visually blocked from the proposed scrapes due to local topography (a raised bund for a discharge pipe to the river). A second area of willow scrub is proposed in a corner of a field, which is in an existing hollow with scrubby edges – it not visible over the flood defence bund if standing in the proposed scrape areas. Low-growing species, such as goat willow, will be proposed in these locations.<br><br>Fenton gorse – comments regarding natural regeneration are noted and their feasibility will be considered during preparation of the final LEMP. However, these measures will also require balance the targets that have been set in the **Outline LEMP [APP-116]**, which require some degree of certainty i.e. it may not be favourable to rely on natural regeneration to deliver the landscape commitments. The final LEMP and planting plans will provide further details on how habitat establishment will be achieved.<br><br>Peninsula creation - Following consultation with other key stakeholders and reviewing ground engineering options, it is no |

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| | | commercial grazing to provide the greatest benefits for wildlife.<br>• We support a 5m buffer between LWS ditch and agricultural land where wet scrapes could be created. | longer proposed that a peninsula is created in Littleborough Lagoon as part of the Steeple Renewables Project. It is proposed that no engineering of the lake banks is undertaken.<br>Grazing – comments regarding livestock types have been noted. The Applicant is not in a position to commit to particular breeds at this time. Conservation grazing is intended to be applied in the Eastern Biodiversity Mitigation Area (subject to monitoring findings and availability of suitable grazing tenants). |
| RR-055/9 | Ecology/Habitat Creation | Western Biodiversity Mitigation Area This area is approximately 82 ha and will be used for habitat creation and enhancement measures only. It currently supports arable fields with boundary hedgerows, and a treelined stream. Arable fields will be enhanced for ground nesting birds (skylark and yellow wagtail) through the provision skylark plots, beetle banks, enhanced arable field margins.<br>• We suggest establishing grassland and allowing the adjacent woodland to 'creep out' to provide a scrub edge to the woodland<br>• We suggest beetle banks rather than broader field margins because they will have greater benefit to skylarks.<br>There may be an opportunity for a farmer to be paid through SFI to manage features when the scheme reopens in 2026. | Comments regarding woodland edge have been noted – but due to the commitments and targets in the **Outline LEMP [APP-116]**, some control over woodland creation is needed. Woodland edge habitat may be encouraged by using a 'woodland edge mix' that provides an ecotone between grassland and woodland. This will be considered when drafting up the planting schedules.<br>Beetle banks will be provided but will need to be balanced the practicalities of managing the farm, and will not be provided in place of field margins due to the BNG commitments (regarding creation of priority habitat [arable field margins]). |
| RR-055/10 | Ecology/Lapwing | We would like to see lapwing plots incorporated into this area. This may be an action in the Sustainable Farming Incentive (SFI) scheme when it reopens in 2026. | The wetland alterations in the Eastern Biodiversity Mitigation Area have been developed through liaison between the Applicant and the Nottinghamshire Wildlife Trust and the ecology officers from the district and county councils. Species such as lapwing, |

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| | | This action's aim is that there are fallow cultivated plots within an arable crop which have enough bare ground for nesting lapwings that are present from early spring until the arable crop is harvested in the summer. The purpose of this is to provide nesting sites for lapwing and habitats for other declining farmland birds, farmland wildlife and important arable plants. We acknowledge that the Eastern Mitigation Area could provide nesting and foraging habitat for lapwing. | curlew and skylark are considered to benefit from the proposed changes as more habitat structure and diversity will be introduced.<br><br>Since the Proposed Development will not result in residual adverse impacts to lapwing (as the species was only present in the Eastern Biodiversity Mitigation Area, which will not be subject to development impacts), further measures in the form of lapwing plots are not considered necessary (**Chapter 7: Biodiversity and Ecology [APP-115]**). |
| RR-055/11 | Ecology / Skylark | Skylark Mitigation Strategy Skylark territories were recorded across the Site, primarily within arable fields and occasionally in grassland fields. This comprised peak counts of 105 territories within the Proposed Solar Areas in 2023 (90 in 2024), 17 in the Western Biodiversity Mitigation Area (in both 2023 and 2024) and 13 in the Eastern Biodiversity Mitigation Area in 2024 (11 in 2023 but in a slightly smaller survey area).<br>The PIER considers the Site to be of District level importance for breeding skylark. Chapter 7 - Ecology and Biodiversity, section 7.12.19 concludes 'Residual effects on skylark of the Proposed Development are assessed as adverse and locally significant. Cumulative effects on skylark are assessed as adverse and significant at the Local to District level.' We note that a total of nine fields has been identified within the Site that are suitable for prioritising the delivery of skylark mitigation measures. These are large arable fields that support low densities of skylark, and which have few deterrent boundary features. | Where not already included as measures in **ES Appendix 7.14 Outline LEMP [APP-116]** (refer to 'Feature 11: Arable Land' enhancement measures proposed in the Outline LEMP), the feasibility of the suggested measures for skylark will be considered in the round during preparation of the final LEMP. The cropping plan (i.e. use of spring-sown crops and leaving overwinter stubble) for the arable land will be determined by the tenant farmer based on what crops are likely to be viable in a given year. The Applicant will look to discuss the farmland management practices with the tenant farmers. |

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| | | We agree that fields that are likely to be required for delivery of other biodiversity measures may contribute to the overall extent of land that will provide opportunities for nesting skylark, but this would likely be at lower densities than the targeted skylark land. The strategy applied to increase the ability of the nine arable fields to support nesting territories of skylark is the creation of skylark plots.<br><br>These are small undrilled patches within cereal fields that provide access for skylark into tall, dense, winter cereal crops to nest and forage. The published evidence is that skylark plots at a density of 2 plots/ha in winter cereal crops will increase the population of skylark in each field with plots by a factor of three (Donald & Morris, 2005).<br><br>Each plot should be located at least 50 m from a field boundary with a hedge or tree (open farm tracks acting as boundaries are discounted as there will be no deterrent effect from these) and at least 50 m from any adjacent woodland. Each plot should be at least 3 m wide, will have a minimum area of 16 square metres, not connected to the tramlines and be created by turning off the drill during sowing.<br><br>The potential enhancement in skylark territories on skylark-priority land by the application of this prescription against the mean total (97.5 territories) likely to be displaced from Solar Areas 51%. We acknowledge that at this stage, this does not | |

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| | | include any land that is targeted for other biodiversity reasons but that may provide skylark nesting opportunities.<br>We note these other areas will be factored in appropriately later in the process. It is estimated that the further mitigation measures could increase the skylark nesting densities in the Eastern and Western Biodiversity Mitigation Areas by 58 territories; this will mitigate approximately 55% (against the 2023 total of 105 territories) to 64% (against the 2024 total of 90 territories) of the territories likely to be displaced from the Proposed Solar Areas. Due to the shortfall, we encourage the applicant to consider additional mitigation measures that consist of implementing management practices on suitable land which have the aim of increasing the carrying capacity further to 'absorb' a significant proportion of territories from the site.<br>Options could include the following:<br>• spring cereals or a spring break crop (other than oilseed rape, which grows too quickly) in the rotation, where viable. This will provide ideal nesting habitat. Spring sown crops allow skylark to have multiple nesting attempts.<br>• Weedy overwinter stubbles are the most beneficial winter-feeding habitat for Skylarks on arable farms. The best stubbles are cereal stubbles which receive no pre-harvest glyphosate and no post- harvest herbicides throughout the winter. Cultivation of stubbles should be delayed going into a spring crop until February or March. | |

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| | | • Use beetle banks to provide over-wintering habitat for beneficial insects. Beetle banks are two- metre grass strips through the middle of arable fields. Such fields can be managed as one unit, as the headland is still cropped. The following link provides plenty of excellent advice to help skylark (yellow wagtail will also benefit): (Redacted) It is stated that converting areas of arable land to grassland will result in the cessation of nitrate and phosphate applications to the land, which is carried out periodically due to current land use. This cessation is likely to lead to less run-off from the land and improve water quality in ditches and water courses. The cessation of nitrate and phosphate applications is to be welcomed due to a positive impact on water quality. | |
| RR-055/12 | Outline Landscape & Environmental Management/Ecology | Outline Landscape & Environmental Management Plan We note that the phasing of the LEMP will allow compensatory habitat for farmland birds to be created before construction activities begin. We support that approach because it will provide higher quality habitat into which birds can be displaced and provide conditions to improve the productivity of the unaffected birds. | The Applicant notes the comment.<br><br>The Applicant agrees that for certain planting/enhancement works, September/October is usually the best time, however work such as tree planting may also be carried out over winter, and due to the scale of the Site, some grassland seeding may be undertaken during the following /preceding springs (April/May). |
| RR-055/13 | | Feature 1: Species-Rich Grassland and Seasonally Wet Meadow, i.e. Other Neutral Grassland for Project 1-1a Enhance modified grassland to other neutral grassland and for Project 1-1b Create other neutral grassland it is stated that the timing of enhancement works could be April / May or September / October for application of seed mixes. | |

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| | | We advocate enhancement works take place during September/October to allow the vernalization process to occur, that is, the exposure of seeds to low temperatures to stimulate flowering or to enhance seed production. We are informed that the final LEMP may include additional grazing specifications to be applied where available after Year 3 (once the grass and wildflowers have developed a strong root structure and seed bank).<br>• Triggers for removal of livestock (such as weather and ground conditions).<br>• Alternative mowing methods to be employed should livestock tenants be unavailable.<br>Appropriate working methods to avoid adverse impacts to faunal species that could be present in the working areas such as ground nesting birds, amphibians, reptiles, and mammals. We fully support monitoring of the establishing grassland and subsequent management because it may be necessary to respond to the monitoring by changing the grazing intensity/duration. We refer you to our advice relating to conservation grazing in the Eastern Biodiversity Mitigation Area. | |
| RR-055/14 | Maintenance | Feature 2: Grassland i.e. Modified Grassland Project 2-2 Manage modified grassland Purpose To maintain modified grassland habitat in moderate condition. The final LEMP may include additional grazing specifications to be applied where available after Year 3 (once the grass and wildflowers have developed a strong root structure that is less likely to be uprooted by grazing animals, and seed bank). | Comments regarding the land that has been identified as possibly supporting intensive grazing or silage production, and whether this is a missed opportunity for skylark have been noted. Other considerations have informed the decision to incorporate lower diversity grassland into the Proposed Development – this includes consideration to providing areas to support sheep during periods when conservation grasslands should not be |

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| | | • Grazing timing and livestock units/stocking density to be applied.<br>• Triggers for removal of livestock (such as weather and ground conditions).<br>• Alternative mowing methods to be employed should livestock tenants be unavailable. We are informed that a small proportion of enclosed fields that will not have arrays (such as along the West Burton Cable corridor, near the BESS infrastructure and under overhead lines) are anticipated to be suitable for more intensive sheep grazing or other agricultural use such as hay or silage production, these may have low plant diversity, with potentially fewer wildflowers. Given that a significant number of skylark territories will be lost to the scheme these areas are less likely to provide nesting habitat for skylark if intensively grazed, which we believe would be a missed opportunity.<br><br>We note that further details related to modified grassland on the habitat enhancement methodology will be provided in the final LEMP. With regards to seedbed preparation: measures will be specified that may include repeated cultivation, ploughing or digging to bury the surface vegetation, then harrowing to produce a medium tilth that can be rolled and to produce a firm surface.<br>We would not advocate burying surface vegetation because the root systems can regenerate and out compete the plants that are | grazed (such as during flowering periods and when the ground is waterlogged), and consideration has also been given to overhead power line locations and their potential influence on skylark nesting.<br><br>Comments regarding ground preparation. the methodology sections of Tables 2 and Tables 3 of the **Outline LEMP [APP-116]** contains options only at this point. NWT's advice on the effectiveness of burying surface vegetation will be considered in the production of the final LEMP. |

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| | | intended to be established, increasing the likelihood that a herbicide application will be required to eliminate the first flush of unwanted plants prior to seeding. | |
| RR-055/15 | Hedgerows | Hedgerow We note that a proportion of the existing native hedgerow (ca. 6.3 km) will be enhanced from 'native hedgerow' to provide 'native hedgerow with trees', with new trees (native standard trees) to be planted at least every 50m along the existing hedgerows and protected from cutting to provide more structure to the hedgerows.<br><br>Hedgerow trees are important for a range of farmland wildlife but across the landscape we would advocate a diversity of hedgerow structures and leaving some hedgerows 'tree free' because there is evidence to suggest that yellowhammer, for example, generally avoid dense, tree-filled hedgerows because they provide perching places for avian predators.<br><br>Yellowhammers, prefer shorter, thicker hedges with a broad base and a good ground cover of grasses and other plants, often near ditches. Appropriate species for hedgerow trees in this area would be oak and willow along watercourses rather than rowan or field maple. We fully support filling existing gaps in hedgerows with appropriate native hedgerow species and allowing the hedgerows to grow taller and wider to act as natural screens around the solar arrays. However, as stated above, a range of hedgerow structures across the site would be beneficial to wildlife. | The detailed design and planting schedules are not yet prepared. However, it is likely that only one or two hedgerow mixes (i.e. proportions of species) will be specified. This is due to the scale of the Site and the need to ensure trees are procurable in large quantities. It is likely that there will be some natural local variations in the species proportions due to the inherent random nature of planting large numbers of trees. Existing hedgerows will receive new species to create 'hedgerow with trees' habitat' Comments regarding hedgerow species and form have been noted – the landscape proposals were prepared with consideration of the NCA description (refer to paragraph 2.8 of the **ES Appendix 7.14 Outline Landscape Ecological Management Plan [APP-116]**. This consideration will be carried through to the detailed design and planting schedules. Regarding the variation in hedgerow form – it is confirmed that over 24 km of new hedgerow that will be created will be native species-rich hedgerow without trees (which will create new landscape feature corridors that connect other hedgerows across the Site – including the existing network of hedgerows, greenways, and woodlands). 8.7 km of hedgerows will be enhanced by allowing mature trees to develop. It is intended to further encourage hedgerow diversity by applying a rotational cutting method where appropriate (i.e. where there is not a risk of blocking a public right of way or shading arrays). |

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| | | The Trent and Belvoir Vales National Character Area should be used as a guide for woodland types and boundary features. Native species, preferably of local provenance stock for all new plantings should be used that are characteristic of the National character Area (NCA). Most hedges in the area are dominated by common hawthorn.<br><br>To increase the value of the hedges to wildlife, existing and new hedges should be enhanced by the introduction of other shrub species. Variation can be achieved by altering the proportions of species used and future management of the hedges. Many hedges in the solar and biodiversity park are species-poor, gappy and maintained short and narrow. There is an opportunity therefore, to improve the biodiversity value of existing hedges through gapping up with additional species and allowing hedges to grow taller and wider. New hedges would be of particular value where they improve connectivity between wooded areas. | |
| RR-055/16 | Drainage | Ditches The final LEMP will include specifications creating ditches. At this point it is proposed the profile will be around 1.5m width and 1m depth V-shaped channels. We would like to see a different design. The illustration below indicates the ideal profile for a drainage ditch to maximize its wildlife value. Ditches should be at least 1m deep, with sides sloping at an angle of 30-45°. Create gently sloping margins and include a shelf with areas of water 30cm deep or less. | These comments have been noted and will be considered during the detailed design and final LEMP secured by Requirement 6 of the **dDCO [APP-041]** for newly created ditches. Following consultation with relevant bodies regarding the existing ditches across the Site, the Applicant is not proposing to change the maintenance regime of existing ditches because of the potential implications to water conveyance and flood risk.<br><br>Measures to protect species during ditch maintenance will be detailed in the final LEMP, including the suggestions to |

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| | | We would also advocate the following channel maintenance. Avoid damaging the banks with heavy machinery when removing silt. Dredged material should not be placed onto the banks but placed a minimum of 2-3m away from the bank. Work should ideally be undertaken from one bank only. Silt and vegetation removal should take place during the winter months to minimize impacts on wildlife. Maintenance work should be done in sections over 2-3 winters to ensure that some wildlife habitat always remains. | undertake maintenance in zones - however, the area floods during winter, so maintenance cannot be confined to this period. Dredging will not be proposed as routine maintenance but may be undertaken as a result of the monitoring (the outline of which is provided in Table 8 of **ES Appendix 7.14 Outline LEMP [APP-116]).** |
| RR-055/17 | Water and Flood Risk | Floodplain Grazing Marsh and Lake The final LEMP will include specifications for creating wet scrapes (number and location to be confirmed, but these will be located more than 10m from watercourses). The specification will be prepared with reference to the Wildlife Trust guidance for wader scrapes, which is included as Annex 2 and has the following specifications.<br>• Scrapes should be excavated to less than 1m deep and ideally 20m2 in size.<br>• The scrape should be an uneven shape<br>• The base of the scrape should also be uneven to create habitat diversity<br>• Spoil should be spread thinly across the surrounding floodplain<br>• Additional plug planting may be undertaken to introduce key species such as great burnet, pepper saxifrage and ragged robin | This comment has been noted, and the guidance was adopted as part of the **Outline LEMP [APP-116]** (included verbatim as an Annex to the oLEMP). Requirement 6 of the DCO ensures that the final LEMP will be in accordance with the Outline LEMP. |
| RR-055/18 | Arable Land/Skylark | We note the intention to increase the carrying capacity of the arable land for farmland birds such as skylark. The arable fields | The suggestion for the crop rotation to be switched to spring cereals has been noted and the feasibility of the suggested |

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| | | currently have a peak count of 29 skylark territories (based on 2024 and 2025 breeding bird characterisation surveys).<br>It is stated that the final LEMP will elaborate on the measures for cropland to be managed for farmland birds such as skylark that is likely to include 'skylark plots' in cereal crops at approximately 2 plots/ha. Each plot will be located at least 50 m from a field boundary with a hedge or tree (open farm tracks acting as boundaries are discounted as there will be no deterrent effect from these) and at least 50 m from any adjacent woodland.<br><br>Each plot will be at least 3 m wide, will have a minimum area of 16 square metres, will not be connected to the tramlines and will be created by turning off the drill during sowing. Other measures proposed include increasing widths and plant diversity of grassy field margins, through undertaking overseeding/seeding as outlined in Project 1-1a and 1-1b, including measures to promote arable plants by undertaking occasional cultivation of field margins at an appropriate time of year. In addition, creating 'beetle banks' across fields and managing fields with a crop rotation that includes fallow fields or bird mixes. We are supportive of these measures, and we would also ask that consideration is given to a switch to spring sown crops that will allow skylark to have multiple nesting attempts before the crop becomes too tall and dense. The switch also provides an opportunity to address issues with black grass. See comments within the Skylark Mitigation Strategy section. | measures will be considered during preparation of the final LEMP.<br><br>The cropping plan (i.e. use of spring-sown crops and leaving overwinter stubble) for the arable land will be determined by the tenant farmer based on what crops are likely to be viable in a given year. The Applicant will discuss the farmland management practices with the tenant farmers. |

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| RR-055/19 | Local Wildlife Sites | Five Local Wildlife Sites (LWS) are within the Site, and two LWSs are within 100 m of the Site. West Burton Meadow LWS and Clarborough Tunnel LWS are located off-site but within 100m of the Site boundary, both of which are designated on account of their habitat interest.<br><br>Clarborough Tunnel LWS is also designated as SSSI. Clarborough Tunnel SSSI is 40 m southwest, and the following Local Wildlife Sites (LWS) are partially or wholly within the Site or adjacent to it: Blue Stocking Lane, Clarborough; High House Road Verges; Sturton Le Steeple; Mother Drain, Upper Ings; Thornhill Lane Drain, Littleborough; Littleborough Lagoons; West Burton Meadow.<br><br>Local Wildlife Sites (LWS) are a local, non-statutory designation, below (but complements) the national suite of designated Sites of Special Scientific Interest (SSSIs). They are of substantive value for the conservation of biodiversity and are home to rare and scarce species or represent the best surviving examples of habitats that were once widespread and typical of the Nottinghamshire landscape. Collectively, these sites form an essential ecological network and act as wildlife corridors and steppingstones, allowing species to migrate and disperse between sites. The continued existence of these sites is vital to safeguard wildlife from the pressures of development, intensive agriculture, and climate change. | The scheme design has incorporated protection areas for the LWS wherever possible, or where this may not be wholly possible (at High House Road Verges LWS, where construction traffic may cross the LWS boundary), detailed baseline botanical surveys have been undertaken to understand how the overall LWS may be enhanced as part of the proposals (refer to paragraphs 3.9 and 3.16 of **ES Appendix 7.2: Designated Sites [APP-104]).** |

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| | | The LWS network is comprehensive (meaning that every site which qualifies as a LWS is designated as one), whereas SSSIs are representative of the best sites in an area, such that that not all sites which meet the SSSI selection criteria have been, or will be, designated as a SSSI. Because of this, several LWS would potentially qualify as SSSIs, meaning that LWS are best described as sites that are of at least county-level importance for their flora and/or fauna. Every effort should be made, therefore, to ensure that LWS are protected and buffered from development, and this is recognised in Local Planning Policies.<br><br>The NPPF also specifically cites the need for the protection of irreplaceable habitats. We are supportive, where feasible, for the implementation of improved management of retained habitats, such as grasslands within the nearby LWS as part of the overall mitigation package | |
| RR-055/20 | Ecology/Breeding Birds | Breeding Birds The breeding bird survey revealed that six pairs of lapwings were likely breeding within an arable field in the Eastern Biodiversity Mitigation Area during 2024 with a further pair nesting approximately 50 m from the boundary of the Eastern Biodiversity Mitigation Area in a grassland field.<br>No lapwing was recorded nesting elsewhere within the Site during 2024 or 2023. Flocks of 30 to 50 lapwing (including juveniles) were recorded foraging in arable and grassland fields during June and July 2024 in the Eastern Biodiversity Mitigation Area. Numbers of Lapwings have declined by 55% since the 1960s and the species is on the red list of Birds of Conservation Concern | These comments have been noted and will be taken under consideration during the preparation of the final LEMP. However, lapwing habitat provisions will be provided in the Eastern Biodiversity Mitigation Area – where floodplain grazing marsh will be enhanced. Low intensity grazing of the grasslands in the Eastern Biodiversity Mitigation Area will be implemented where possible to promote appropriate sward structure for nesting (however it is not assumed that the grassland will become species-rich due to the likely high nutrient load associated with the floodplain). |

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| | | 5. Help can be provided for lapwing on arable land through the following interventions:<br>• Look out for lapwing nests during cultivation, hoeing or rolling operations from mid-March. If a series of such operations are necessary, try to complete them all within one week so that failed birds can re-nest safely<br>• In mixed farming areas, plan the rotation to ensure some spring-sown plots are located next to grazed pasture every year<br>• A fallow plot (1-2 hectares in size) in the middle of large fields may offer nesting habitat on arable land where late-sown spring crops are no longer practiced. Bare plots in smaller fields may also be selected by lapwing. They are particularly beneficial if sited in locations where lapwings have nested in the past. Otherwise, site them away from woods or tall hedges and ideally next to grazed pasture or damp areas.<br>• Aim to create the appearance of a very rough seedbed or tillage on the fallow plot before mid-March (birds rarely nest on a bare surface that is too smooth). Leave them undisturbed until mid-July, or before then if the chicks have fledged. | Since the Proposed Development will not result in residual adverse impacts to lapwing (as the species was only present in the Eastern Biodiversity Mitigation Area, which will be subject to development impacts), further measures in the form of lapwing plots are not considered necessary (**Chapter 7: Biodiversity and Ecology [APP-115]**). |
| RR-055/21 | Ecology /Meadow Pit | One pair of meadow pipit was recorded as likely breeding in the Eastern Biodiversity Mitigation Area during 2024. Meadow pipit will typically nest in open habitats such as less intensively managed grassland which is restricted within the site to small areas in the Eastern Biodiversity Mitigation Area. Meadow pipit is | This comment has been noted, and it is considered that meadow pipit will benefit from the proposed changes to land management, as assessed in paragraph 7.8.110 of **ES Chapter - Ecology and Biodiversity [APP-065].** |

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| | | Amber listed and a Species of Conservation Concern in the Nottinghamshire BAP.<br>Low intensity grazing in the Eastern Biodiversity Mitigation Area is likely to benefit this species. | |
| RR-055/22 | Maintenance/Animal Grazing | Grazing Under Solar Panels: We note that there will be a mix of forb and grass species within the grassland areas. The areas may be grazed by sheep for some of the year, but areas under and between arrays will not be grazed at a high intensity to allow a mixed vegetation height to develop. We support that approach. Low intensity grazing can provide a means of managing grassland under panels, providing nature conservation benefit and allow the land to remain in agricultural production. However, high intensity, commercial grazing is unlikely to be beneficial to wildlife. Sheep are a typical choice, being compact enough to pass beneath the panels. We advocate that grazing is implemented with a biodiversity focus with a lower stocking density to maintain some structural diversity within the grassland. Maintaining grassland structure through the winter is good for invertebrates. Grazing should be halted for periods of the spring and summer. Halting grazing in spring (April – June) will favour early flowering plants, whereas summer (July – September) will favour summer flowering plants. Ceasing grazing April – September will provide the greatest biodiversity benefits. A combination of a low stocking density and breaks in grazing should lead to a high diversity of wildflowers and invertebrates as well as benefitting small mammals and foraging birds | Regarding the recommendation to cease grazing during April to September; it is anticipated that flexibility will be built into the final grazing specifications to allow reactivity to the seasons and monitoring as well as changes to the livestock units if required. This framework is presented in Tables 2 and 3 of the **Outline LEMP [APP-116]**, which says that certain triggers will cause the cessation of grazing. For example-some light grazing may still be appropriate in August if it is evident that a tall sward is dominating a plot and some variation in grassland height is needed. However, spring grazing is expected to cease before the end of March to allow plants to flower. For the first five years, annual reviews of the conservation led grazing regime shall be carried out in terms of timing, type and numbers of livestock to deliver grassland enhancement (as specified in Tables 2 and 3 of the **Outline LEMP [APP-116]).** |

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| | | Ceasing grazing April – September will provide the greatest biodiversity benefits. A combination of a low stocking density and breaks in grazing should lead to a high diversity of wildflowers and invertebrates as well as benefitting small mammals and foraging birds. A qualified ecologist should assist with the development of a conservation grazing regime that is suited to the site's characteristics and management objectives. Details of work necessary to retain, create and manage retained and new ecological features during and after construction will be provided in a Construction Environmental Management Plan (CEMP) and Landscape and Environmental Management Plan (LEMP) for the Proposed Development. | |
| RR-055/23 | Construction Environmental Management Plan | The CEMP will be a key document. Measures to minimise construction impacts may include:<br>• Appointment of an ecological clerk of works (ECoW) to provide training and toolbox talks, oversee any activities that could potentially impact biodiversity, be responsible for monitoring and reporting on compliance with planning consents, environmental permits, legislation and mitigation<br>• Reasonable Avoidance Measures (RAMs) such as covering excavations overnight and ensuring all hazardous materials are correctly stored according to Control of Substances Hazardous to health (COSSH) legislation | These precautionary measures will be secured by Requirement 7, which ensures a CEMP must be in place prior to construction, and that it must be in accordance with the **Outline CEMP [APP-089]** and will include the relevant measures. |

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| | | • Use of low-pressure construction vehicles with turf tyres or rubber tracks to minimise soil compaction and rutting.<br>• Construction of quality roads at minimum width and with suitable drainage and sediment controls. This may include nonpermeable membrane to prevent weed damage or laying tracks and roadways that work with the land such as timber mats or road mats which allow vegetation to grow through and minimise the initial impact of laying a solid roadway<br>• General checks by the site manager to assess fencing, litter, and proper storage of materials<br>• Environmental monitoring surveys on water and soil to ensure they are being managed appropriately during the construction period. Water monitoring usually focuses upon sediment control. | |
| RR-055/24 | Decommissioning | Natural Capital Best Practice Guidance Solar Energy UK (2022) Decommissioning. Decommissioning works are likely to be similar in character to those described during construction and we would expect similar environmental controls. It is likely that the extent and value of habitats will have increased over the operational period. It is to be hoped that some of the areas of higher value habitats will be retained at the end of the operational period. It would be disappointing for habitats to be lost after 40 years of establishment and the land returned to the current baseline. We would expect that the decommissioning | The Applicant notes this comment.<br><br>Further detail will be provided in the final Decommissioning Plan. Requirement 21 of the DCO requires the Decommissioning Plan to be submitted and approved prior to any decommissioning works, and that plan must include detailed of pre-decommissioning surveys, and species protection. |

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| | | phase, and its potential ecological effects, will be assessed and appropriately mitigated in line with the prevailing guidance and policies of the time. | |
| RR-055/25 | Mammal passage | Fencing<br>The site will be protected by fencing.<br>The ES should include information on mitigation measures (such as the use of mammal gates and their locations) to avoid significant effects from restricting the movement of species during construction and operation of the proposed development. Consideration should be given to restricting access by mammals to areas that could provide habitat for ground nesting birds. | It is not proposed that mammals are excluded from solar areas or biodiversity areas. The EcIA has assumed that ground nesting birds will be displaced from solar areas, and a mitigation approach has been identified to increase the carrying capacity of the biodiversity mitigation areas for ground nesting birds (**Appendix 7.13 Skylark Mitigation Strategy [APP-115])** and other species. This includes keeping some areas as arable farmland, managed for farmland birds. The addition of mammal-proof fencing in the farmland areas is likely to affect farming operations and may introduce additional impacts to mammals. |
| RR-055/26 | Monitoring | Monitoring The EcIA should identify where monitoring is required for mitigation, compensation, and enhancement measures. It should set out the methods to be used, the criteria for determining success/failure, appropriate timing, mechanisms for implementation, frequency and duration of monitoring, and frequency of reporting. Monitoring may be used to determine:<br>• whether the measures have been implemented as agreed<br>• the success/effectiveness of the measures<br>• early warning of proposed measures which are not proving effective | Such measures for habitats are outlined in **ES Appendix 7.14 Outline Landscape Ecological Management Plan [APP-116]** and will be detailed further in the final LEMP. The final LEMP will be provided post-consent and prior to work commencing, in line with Requirement 6 of the DCO. |

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| | | • how to remedy the situation should any of the implemented measures fail e.g., due to lack of management<br>Monitoring should be secured through a planning condition or obligation built into legal agreements | |
| RR-055/27 | Biodiversity Net Gain (BNG) | Nationally Significant Infrastructure Projects are currently exempt from mandatory Biodiversity Net Gain (BNG) until an anticipated date of November 2025, and there is not yet any guidance about how statutory BNG will apply to such projects. We note however, that in the absence of guidance, and subject to further consultation, a BNG assessment will be reported in the ES using the prevailing Department for Environment, Food and Rural Affairs (Defra) metric.<br><br>This ambitious project represents an opportunity to deliver habitat creation and enhancement at a significant level and set a benchmark for other solar schemes. Reflecting the principles and definitions of the Environment Act 2021, we encourage the applicant to deliver a minimum of 10% net gain in biodiversity so that the biodiversity value of the development exceeds the pre-development on site habitat value by at least 10% but ideally aiming for more. Habitats should be secured for at least the life of the scheme. The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss. Appropriate site-specific recommendations will be required for providing enhancements specific for Nottinghamshire BAP species and | This comment has been addressed via provision of the **ES Appendix 7.12 - Biodiversity Net Gain Report [APP-114]**, which provides details of the estimated Biodiversity Gain (with at least 10% gain), and details of the how the mitigation and biodiversity hierarchies have been applied has been provided.<br><br>The applicant aims to deliver 10% biodiversity gain despite this not yet being mandated for nationally significant infrastructure projects. |

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| | | Section 41 Species and habitats of Principal Importance (NERC Act 2006). | |
| RR-055/28 | Cumulative effects | NWT is aware of several other proposed solar developments similar in scope and scale and in proximity to or even bounding the site are in development. We encourage communication between project teams to deliver habitat connectivity across these sites to provide greater benefits for wildlife and contribute to natures | The landscape design has been undertaken with regard to other schemes in the local area, with an aim to provide connectivity and integration with the wider landscape where possible - for example, review of the Gate Burton Energy Park and West Burton Solar Project landscape designs was undertaken to consider how mobile species may travel between sites in future; informing the design of the Eastern Biodiversity Mitigation Area. Particular attention was given to the River Trent corridor – and the West Burton Solar Project was seen to include a network of ditches and ponds adjacent to the river. The Applicant has proposed similar habitat adjacent to the River Trent in an effort to provide a network of 'joined-up' floodplain habitats. |

## Table 2-23: Nottinghamshire Campaign for the Protection of Rural England

| ID | Theme | Verbatim Comment | Response |
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| RR-051/1 | Food Security | The project proposes to use 1700 acres of which 87% is BMV (Best & Most Versatile) land which is actively growing food: this is in direct contrast to the government's stated policy of protecting food-growing land. It also causes loss of jobs in agricultural & allied trades and their workers' living quarters.<br><br>The population of the UK is increasing and so the requirement for the UK to grow its own food will increase; the UK must not be held hostage by hostile states or need to import food using the two worst "greenhouse" fuels (aviation and ships' bunker). The Royal Society report on land use "Multifunctional Landscapes" (2023) calls for levels of around 75% overall self-sufficiency in food production to be maintained; currently this is decreasing rapidly from circa 60% in the UK, with the loss of productive land to solar, housing and other schemes such as this absorbing large acreages of crops.<br><br>The Government's own Solar Roadmap (2025) sets out on page 20 that it will maintain planning protections for our best agricultural land, but granting this scheme the go-ahead would directly conflict with this. National CPRE analysis of land use at existing solar sites (see point 5 below) has found this "protection" to be very much lacking. | **ES Chapter 15: Land Use and Agriculture [APP-072]** has had regard to agricultural land quality and identified the grade of land within the Order Limits. **ES Appendix 15.1 Agricultural Land Classification Report [APP-131]** provides more detail of the land classification within the Order Limits and **ES Appendix 15.2 Outline Soil Management Plan [APP-132]** details how soil within the Order Limits will be managed for the lifetime of the Proposed Development.<br><br>Approximately 72.1% of the land within the Order Limits forms BMV land. However, the Proposed Development will only result in temporary disturbance of approximately 12.1 ha of BMV agricultural land. This land will not be lost, in that it is all capable of restoration to a comparable grade at the decommissioning phase. The works require the removal of topsoil, its storage in suitable conditions, and its replacement following the removal of the fixed equipment. None of the fixed equipment requires deep foundations, and mostly only topsoil requires to be stripped off and stored. The Applicant has followed guidance in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra (2009). The reinstatement to comparable soil properties and land grade would be undertaken in accordance with a Soil Management Plan secured by Requirement 11 of the dDCO, with regard to the measures stated |

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| | | | within **ES Appendix 15.2- Outline Soil Management Plan [APP-132]**.<br><br>The Applicant has sought to minimise impacts on BMV land through the design of the Proposed Development (as previously mentioned) and ALC ratings as well as agricultural land productivity. This includes through discussions with landowners and minimising the impact of the Proposed Development on the landowners' wider land holdings.<br><br>Effectively the Proposed Development minimises impacts on agricultural land, retaining the ability to reinstate arable agricultural land after decommissioning as well as allowing soils to rest in the interim.<br><br>Panel areas will still support grazing through biodiversity management and therefore continue to contribute as an agricultural resource. However, it is noted that food security and food production isn't a relevant consideration under the NPS. In accordance with paragraph 5.11.12 of NPS EN-1 the Applicant has demonstrated that the Proposed Development minimises impacts upon BMV land and in accordance with paragraph 5.11.34 of NPS EN-1 the development is justified on BMV agricultural land due to the fact there are insufficient areas of available non-BMV land without constraints on which to accommodate the whole Proposed Development. Furthermore, in accordance with Paragraph 5.11.12 of NPS EN-1 the Proposed |

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| | | | Development will minimise impacts on the best and most versatile agricultural land by not lead to any permanent loss of BMV land within the Site.<br><br>Use of BMV land within the Site is justified by NPS EN-1 paragraph 5.11.34 due to factors related to site location and context within the Proposed Development, wider landholding and in relation to adjacent and surrounding land. The reason for retaining some areas of BMV land in general is because it forms part of larger fields of lower grade land and would not be practical to remove this from the Proposed Development in terms of layout or continue to farm as small, isolated land parcels.<br><br>Significant public benefits of the Proposed Development outweigh the reversible use of 72.1% BMV agricultural land for the duration of the Proposed Development, particularly noting NPS EN-3 paragraph 2.10.29 that states land type should not be the predominant factor in determining suitability of a site for solar development. |
| RR-051/2 | Cumulative Impacts | Due to the attraction of connection to the National Grid being available at nearby West Burton power station, this area has become a magnet for farmland solar schemes. This project in particular will completely surround and isolate the village of Sturton le Steeple; it will be one of several solar schemes in the immediate vicinity and the “cluster” effect is one the government must avoid, as it turns the local landscape into a glass desert. | The cumulative impact of the Proposed Development with pending consideration, approved and operational development within a 10km Zone of Influence (ZoI) for the consideration of landscape and visual effects (maximum distance from the Proposed Development where any of the other projects would have the potential to result in significant effects with the Proposed Development) has been considered in **ES Chapter 6:** |

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| | | • The project will be but one of several to affect this small village, including:<br>• an already approved 200 acre solar scheme immediately west;<br>• a large quarry immediately east with well over 100 transport movements per day;<br>• a second approved gas power station and further solar installations on the northern edge;<br>• a nuclear fusion project on its northern edge;<br>• a Ministry oil pipeline running through the west of the proposed project area;<br>• construction of the new North Humber – High Marnham power cable route through the centre of the proposed site;<br>• construction of the West Burton solar “farm”(Lincs.) & other already approved solar "farm" connections being routed through the site. | **Landscape and Visual Impact and Residential Amenity [APP-064]**. This includes the developments identified in the response from Nottinghamshire CPRE. In conclusion no significant cumulative effects would arise with regards to landscape and visual impact. |
| RR-051/3 | Ecology and Biodiversity | The government professes to wish to increase biodiversity but this is not possible within solar “farm” areas where 8ft high fences and lighting obstruct the passage of wild animals, and hedges and other natural features are cleared to make way for solar panels. It has been demonstrated that the surveys of wildlife undertaken by RES for the Steeple Renewables Project were both incomplete and conducted at the incorrect times of the year and cannot be relied on. Proof of existing extensive wildlife has been provided by local residents, who will be surrounded by 8ft high fences, under constant surveillance & | The continued movement of mammals has been considered as part of the Proposed Development. It is proposed that appropriately placed mammal gaps are created in the fencing to allow species such as badgers, brown hare, and hedgehogs to access the grasslands throughout the array areas. The locations of the mammal gaps in the fence will be determined following updated survey ahead of construction.<br><br>98.5% of the ca. 70 km of existing hedgerows will be retained and managed for biodiversity. 12.5% of the existing hedgerows will be |

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| | | noise from battery installations, and, with many townspeople who come here for the rural peace, unable to experience the local countryside any longer.. | enhanced to be more biodiverse (planting of additional trees), and a further 25.3 km of hedgerows will be created.<br><br>A full suite of ecological surveys has been completed to inform the Application and the scope, timing, and methods were agreed with key ecological stakeholders consisting of Natural England, Nottinghamshire County Council Ecology Team, Bassetlaw District Council Ecology Team and Nottinghamshire Wildlife Trust. This included over a thousand hours of ecological surveyor effort on Site, as well as several thousand hours of remote monitoring effort to inform the assessment of the ecological baseline. The Applicant disagrees that the surveys were both incomplete and conducted at the wrong time of the year. |
| RR-051/4 | General | Please read CPRE's excellent 2025 report "Getting solar off the ground: the problem of mega solar in the countryside" which fully explains exactly why projects like those proposed by RES at Steeple Renewables, should be totally rejected, our food growing capacity increased (NOT decreased), our wildlife and countryside truly protected, and solar located on the many available alternative surfaces readily available. These include rooftops (domestic and commercial), car parks, along motorways, and many others. We appear to be the ONLY European country failing to use these alternative locations, instead condemning our food growing land to an infertile and increasingly obsolete future whilst exacerbating the problem of recycling millions of redundant solar panels. | NPS EN-1, NPS EN-3 and NPS EN-5 as well as other national energy policy set out the UK Government's aim for a secure, long term, reliable, resilient, affordable and low-cost energy supply generated in the UK whilst, at the same time, decarbonising the energy system.<br><br>The principal need for the Proposed Development is centred on the significant contribution it will make to the three important national energy policy (NPS EN-1, NPS EN-3 and NPS EN-5) aims of Decarbonisation, Security of Supply and Affordability. This need is also in the context that the above objectives will need to be delivered during a period where there will be an increasing level of demand for electricity. |

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| | | | National planning policy supports the principle and there is a significant need for the Proposed Development.<br>Ecological review of the cited CPRE report highlights that solar farms may pose risks of disrupting wildlife corridors and causing light pollution. The Applicant has provided details above to ensure the Steeple Renewables Project eliminates or minimises these risks, as per **ES Appendix 4.1 - Outline Construction Environmental Management Plan [APP-089]** and **ES Appendix 4.2 - Outline Decommissioning Plan [APP-090EN0]**. The CPRE report also recommends that all irreplaceable habitats should be retained, which the Applicant has committed to do. The CPRE report also states that hedges and trees should be retained and protected. The Applicant has committed to retain all trees and will retain over 98% of hedgerows (and provide a net gain overall). |

## Table 2-24: UKIFS

| ID | Theme | Verbatim Comment | Response |
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| RR-046/1 | Protective provisions | The proposed point of connection for the Proposed Development is the National Grid Electricity Transmission substation within the Site. The Proposed Development therefore includes underground cabling to the point of connection across the Site. It is also noted that the draft DCO includes powers of compulsory acquisition. The Site is owned by EDF Energy (Thermal Generation) Limited ("EDF") and UKAEA has the benefit of an Option over the Site, which will be used for UKIFS to deliver STEP.<br><br>We note that protective provisions have been provided for UKAEA within the Part 9 of Schedule 10 of the draft DCO (the "Protective Provisions"). Protective provisions should also be included for UKIFS within the draft DCO in substantively the same form as were included in Schedule 15 Part 19 of The West Burton Solar Project Order 2025. This is to ensure that any powers are exercised consistently with the development of STEP, including compliance with relevant standards for works proposed, future access arrangements and safeguarding. Acceptance by the Applicant that those provisions are required is welcomed by UKIFS.<br><br>We note in the Protective Provisions that "UKAEA Land" is defined as plots 05/06 and 05/10. It appears that UKAEA also has an interest in the plots identified as 05/04, 05/05 and 05/07 of the | The Applicant is negotiating protective provisions with UK Industrial Fusion Solutions Ltd to ensure that its proposals are not subject to serious detriment as a result of the Proposed Development. Draft protective provisions are included in the **dDCO [APP-041].** The Applicant is confident that agreement can be reached with the UK Industrial Fusion Solutions Ltd prior to the close of the Examination. |

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| | | Land Plan. This should be reflected in that definition in the Protective Provisions in favour of UKIFS.<br>We note that in the Protective Provisions the 'West Burton Power Station" is defined as "that land known as West Burton Power Station". For the avoidance of doubt, this definition should incorporate reference to a plan showing this area. This was the approach taken in Schedule 15 Part 19 of The West Burton Solar Project Order 2025.<br><br>We note that sub-paragraph 142(4)(c) of the Protective Provisions introduces a deemed approval provision for plans of specified works submitted for written approval under sub-paragraph 142(3). It is not appropriate to provide for the approval of UKIFS to be deemed to be given, this drafting should therefore be removed to align with the approach taken in Schedule 15 Part 19 of The West Burton Solar Project Order 2025 which was accepted by the Secretary of State as appropriate.<br><br>UKIFS therefore considers that in order to adequately protect its interest in the future development of the STEP, the protective provisions should be amended such that they: 1. Apply expressly for the benefit of UKIFS, as well as UKAEA; 2. Reflect the full extent of the UKAEA Land; 3. Define "West Burton Power Station" with specific reference to a plan; 4. Remove the deemed approval provision contained in sub-paragraph 142(4)(c). | |

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| | | We expect that Renewable Energy Systems Limited will continue to engage with UKIFS throughout the examination process, and UKIFS would welcome direct contact from the Applicant or its team to ensure that the final details of the protective provisions for the benefit of UKIFS can be agreed at the earliest opportunity and the Examining Authority updated accordingly. | |

## Table 2-25: North Leverton Windmill Charitable Trust

| ID | Theme | Verbatim Comment | Response |
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| RR-002/1 | Heritage | The Applicant has failed to accurately describe North Leverton Windmill, a heritage asset (National Importance and Grade 2* listed) and totally ignored its position as an important tourist attraction and has given no consideration to the visual impact that the project will have on the views from the windmill tower. The Windmill holds Best Tourist Attraction in North Nottinghamshire as voted for by the public. We have 1000's of visitors throughout the year and almost all climb the tower and look out of the windows (the views of the fields to the North will be almost all covered in solar panels). In addition the views from Retford Road (a popular photo spot) of the windmill will have almost all the backdrop being solar panels. The project will most likely have an adverse impact on the windmill and thus its sustainability. This also has potential to impact on other businesses that benefit from the tourist numbers the windmill attracts. The developer has failed to engage with the Trust and it was the trustees that invited them to visit the Windmill and see the actual impact towards the end of the consultation period - no feedback has been given and the EIA still does not refer to tourism nor any visual / economic impact | The Applicant is uncertain in what way the North Leverton Windmill has been inaccurately described, with the description provided in **Appendix 9.1 Cultural Heritage Technical Baseline [APP-122]**. having come from Historic England's Listing description and informed by visiting the asset. With regards to the argument that the Proposed Development would impact on tourism and the sustainability of the Mill – we have not been presented with any evidence to suggest that the Proposed Development would result in any reduction in tourist numbers.<br><br>**ES Chapter 10: Socio-Economics [APP-068]** concludes during both the construction and decommissioning phases of the Proposed Development there would be a significant medium and major beneficial effects upon the local accommodation sector through employment and accommodation stock. Whilst not directly related on the Windmill, this points to a wider picture of beneficial impact in related sectors.<br><br>Whilst the continued use of this Mill is part of its significance, the Proposed Development will not have any impact upon this – and as such, it is considered that the elements that a visitor experiences and appreciates when visiting the Mill (the historic fabric, the moving sails, the ability to purchase flour milled here and its immediate agricultural surroundings) will not change to such an extent that this is a cause of harm to significance. With |

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| | | | regard to the assertion that there was a failure to engage, it should be noted that the Applicant did visit the Windmill with the owners at their request on Friday 7th March 2025.<br><br>With regard to views, both to and from the asset, these, and their relationship to the significance of the asset have been considered within the **ES Chapter 9: Cultural Heritage [APP-067])** and **Cultural Heritage Technical Baseline (Appendix 9.1, [APP-122])**, and it is noted that *"Although the height of the asset is an important feature, this is a result of the function of the building and a practical design. Longer distance views from the asset are considered to be incidental rather than by any design intent. The small windows are placed to allow light to enter the mill, rather than to provide any particular views."* |

## Table 2-26: Society for the Protection of Ancient Buildings Mills Section

| ID | Theme | Verbatim Comment | Response |
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| RR-040/1 | Heritage | The SPAB Mills Section is objecting to the proposal on setting and visual impact grounds, as the proposed planting of dense and reasonably high hedgerows to mitigate the installation of the solar panels might affect the surrounding airflow of North Leverton Windmill and might have a negative impact on the sails of the windmill when in operation. | This comment does not appear to be supported by any evidence that the planting of hedges would affect wind flow to the extent that it would affect the operation of the North Leverton Windmill. The North Leverton windmill is not currently situated in isolation, there is the Windmill Cottage Workshop to the immediate southwest and various trees and hedges the windmill lies *c.*260m south of the **Order Limits [APP-009]** and sits on a lower level of land, with the windmill perched on a higher rise. The Applicant considers that due the spatial separation between the Proposed Development and the windmill that it is highly unlikely that the Proposed Development would cause any influence on wind patterns experienced by the windmill.<br><br>The **Landscape and Ecological Mitigation Strategy [APP-160]**, demonstrates that the proposed hedgerow planting in land within the south of the Site will not exceed the height of the existing hedgerows with intermittent trees that currently border the southern extent of the Site on land closest to the windmill. The Applicant therefore does not consider that the Proposed Development presents a risk of influence of wind patterns sufficient to affect the windmill.<br><br>Therefore, it is not anticipated that the Proposed Development would cause any change to the operational use of the windmill. |

## Table 2-27: Fields for Farming

| ID | Theme | Verbatim Comment | Response |
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| RR-035/1 | General | The scale of local opposition to the Proposed Development is demonstrated by the results of a survey commissioned by FFF of residents in summer 2024 when the Proposed Development was at consultation stage. The results of the 745 responses received to survey show, amongst other things, that 99% of respondents object to the scale of the Proposed Development. | Scale has been carefully considered by the Applicant with the main landscape and visual impacts minimised through sensitive siting of the largest components (BESS and substation) nearest the West Burton Power station and grid connection point. The Proposed Development also benefits from a green infrastructure led landscape and ecological design. Adverse effects are localised and will be reversed following decommissioning at the end of the Proposed Development's operational life. NPS EN-1 acknowledges adverse effects are likely given the scale of energy NSIPs, and in accordance with paragraph 5.10.35 of NPS EN-1 significant residual visual effects of the Proposed Development are outweighed by the Proposed Development's benefits set out in Section 5 of the **Planning Statement [APP-182].**<br><br>The **Consultation Report [APP-047]** sets out the consultation the Applicant has undertaken prior to submission of the NSIP. In summary, this consisted off Initial Engagement (July to September 2023), non-statutory consultation (23rd October to 06th December 2023), Statement of Community Consultation (SoCC) Development and consultation (March to December 2024), statutory consultation (20th January to 03rd March 2025) and on-going engagement March 2025 to May 2025. The Applicant listened to comments received and several amendments to the Proposed Development have been made, this includes reducing the scale of development by reducing the |

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| | | | area from 943.4 ha to 888.31 ha and panel height from 3.6 to 3 metres. |
| RR-035/2 | Size and Scale | The very significant size of the Proposed Development (1,700 acres) and the fact that its current footprint as proposed will completely engulf the village of Sturton le Steeple means that it will have an acute and very tangible negative impact on the rural community and its way of life (as explained further in these submissions). | The impact of the Proposed Development to local residents has been carefully considered within relevant chapters of the **Environmental Statement [APP-058 to APP-075]** and Chapter 6 of the **Planning Statement [APP-182]**. Further safeguards and improvements for Local Residents are secured in the **dDCO [APP-041]** such as Requirement 6 (Landscape Ecological Management Plan), Requirement 7 (Construction Environmental Management Plan), Requirement 8 (Construction Traffic Management Plan), Requirement 9 (Operational Environmental Management Plan), Requirement 14 (Operational Noise), Requirement 18 (Permissive Paths), Requirement 19 (Construction Hours) and Requirement 21 (Decommissioning and Restoration). |
| RR-035/3 | Cumulative Impacts | Residents of Sturton le Steeple are particularly concerned about the cumulative impact of an overwhelming number of existing, approved or proposed industrial-scale development projects impacting the village and surrounding area (as described below) and that the combined effect of those projects is fully taken into account in the examination by the Examining Authority (the "Authority") of the Proposed Development.<br>The sheer number of development projects proposed in the immediate area over the past few years has meant that the community has been overwhelmed by documentation and requests for feedback in relation to multiple concurrent projects. This has led to significant confusion, increased anxiety and overload fatigue on the part of residents trying to find time to | Cumulative impact has been carefully considered by the Applicant with the main landscape and visual impacts minimised through sensitive siting of the largest components (BESS and substation) nearest the West Burton Power station and grid connection point. The Proposed Development also benefits from a green infrastructure led landscape and ecological design. Adverse effects are localised and will be reversed following decommissioning at the end of the Proposed Development's operational life. NPS EN-1 acknowledges adverse effects are likely given the scale of energy NSIPs, and in accordance with paragraph 5.10.35 of NPS EN-1 significant residual visual effects of the Proposed Development are outweighed by the Proposed |

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| | | review and meaningfully engage with meetings and consultations for projects including the Proposed Development. Whilst the Applicant is clearly in a position to devote considerable resource to preparing its application and pursue its objectives (the documents comprising 7 volumes which run to a total 9,125 pages), the Residents are simply trying to live their lives within the community and have neither the time nor resources to review a voluminous and (in many areas, to the layperson, impenetrable) application in detail. That means it is also very difficult for residents to keep track of changes made to documents by the applicant as they evolve. | Development's benefits set out in Section 5 of the **Planning Statement [APP-182].**<br><br>The **Consultation Report [APP-047]** sets out the consultation the Applicant has undertaken prior to submission of the NSIP. In summary, this consisted off Initial Engagement (July to September 2023), non-statutory consultation (23rd October to 06th December 2023), Statement of Community Consultation (SoCC) Development and consultation (March to December 2024), statutory consultation (20th January to 03rd March 2025) and on-going engagement March 2025 to May 2025. The Applicant listened to comments received and several amendments to the Proposed Development have been made. The Applicant is committed to further engagement with Fields for Farming as well as the wider community. |
| RR-035/4 | General | In the circumstances, and aware that residents are at a significant disadvantage in the process, FFF has sought to review as much of the application and provide as much detail as possible in these initial registration comments. However, the six-week period allowed by the Applicant for registration (17 July to 28 August 2025) has directly coincided with the summer holiday period and has meant that FFF and residents have not had sufficient time to review the application documents in as much detail as they would otherwise have liked. As such, FFF intends to supplement the content as the examination progresses, as required by the Authority or as the information becomes available. | The Applicant was aware that the consultation period would fall over the summer holiday period, which may have impacted a number of consultees. As a result, the Applicant extended the consultation period past the 28-day statutory minimum to a total of 42 days. |

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| RR-035/5 | General | For the reasons set out in these submissions (which FFF will expand upon in due course as requested by the Authority), FFF, on behalf of the Residents respectfully request that the Authority reject the application for a DCO in respect of the Proposed Development [in its current scale and form], FFF's specific comments are set out under the following categories: a. Cumulative Impact b. Ecology, Biodiversity and Wildlife c. Flood Risk d. Loss of BMV Agricultural Land, Food Security and Socio Economics e. Road Safety and Traffic f. Landscape and Visual Amenity g. Cultural Heritage h. Air, Noise & Light | The Applicant notes this comment with grounds of objection highlighted under seven categories and that they are discussed in more detail further within the RR. The Applicant has responded to each ground of objection further within this response as they are provided individually. |
| RR-035/6 | Cumulative Impacts | The community's primary concern is about the combined impact of the Proposed Development alongside multiple other recent, existing and proposed industrial projects in the immediate vicinity of Sturton le Steeple and the fact that no real consideration is being given in the processes of consultation and examination of those projects to the cumulative impact of them on the village.<br>The Planning Advisory Service in its July 2023 Nationally Significant Infrastructure Projects Network for Local Authorities acknowledges that dealing with multiple NSIPs impacting a single village requires a heightened degree of vigilance, coordination, and responsiveness from all parties involved but it would seem that such has been taken in relation to the Proposed Development.<br>In its Cumulative Effects Assessment, the Applicant acknowledges that there are no less than 37 of "other developments" within a 15km radius of the Proposed | NSIP: Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025) note recommends that a wide range of future projects are included within the cumulative assessment which can be tiered (from Tier 1-3) according to how far advanced the development is within the planning system and to the level of detail that is likely to be available for each tier, with Tier 3 projects being the least advanced in the process.<br>The Applicant notes the UK Government has confirmed the West Burton A Power Station site will be home to the ground-breaking Spherical Tokamak for Energy Production (STEP) prototype fusion energy plant. Although the location of this development has been selected, this project is in its infancy with no registered intention for development such that the Tier 3 requirements are not satisfied. Therefore, due to the infancy stage of development for the STEP proposal, this ES has not considered this development further as detail is not available to carry out a robust assessment. The Applicant understands the Proposed |

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| | | Development (as set out in the long-list in Appendix 2.3 (EN010163/APP/6.3.2)).<br><br>However, it is notable that the Cumulative Effects Assessment gives no consideration at all to the two most significant NSIPs proposed for the immediate: (i) the Spherical Tokomak for Energy Production ("STEP") nuclear fusion plant; and (ii) the National Great Grid Upgrade. The Residents maintain that the enormous scale and significance of these proposed projects, and inevitable long-term impact they will have on the local area, means they should be taken into account in any cumulative impact assessment of the Proposed Development. Even at this early stage, there is sufficient information available in the public domain in relation to their scope and scale to appreciate the very significant impact they will have on the area. | Development will not cause risk to the STEP project in regard to connection capacity at National Grid West Burton Substation however, as each project is subject to separate gird connections.<br><br>**ES Chapter 2: Environmental Impact Assessment Methodology and Public Consultation [APP-060]** sets out the general assessment approach for the ES Chapters and Table 2.8 setting out the Zone of Influence identified for the Cumulative Effects Assessment of each Environmental Topic.<br>**ES Appendix 2.3** provides a **Cumulative Sites Long List and Short List [APP-088]** with North Humber to High Marnham OHL NSIP identified as ID 2 and a Tier 2 project in Table 1.2 - Cumulative Sites Long List as well as no.14 and Tier 2 in Table 1.3 Short List of Cumulative Schemes. It has been considered as part of the cumulative assessment within each chapter of the ES.<br><br>**ES Chapter 18: Summary [APP-075]** section 18.5 concludes on cumulative effects during all phases of development. In summary, the assessment of cumulative effects has considered the potential for effects from other developments in the area to combine with and intensify effects caused by the Proposed Development. Significant cumulative residual effects are identified for ecology and biodiversity, socio-economics and climate change. In regard to ecology and biodiversity, a local to district level significant adverse cumulative effects anticipated for breeding skylark birds. There would be significant beneficial effects on employment and economic contribution as a result of |

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| | | | the combined effect of the Proposed Development with other developments during the construction, operation and decommissioning phases. During the construction phase a significant adverse cumulative effect is identified for accommodation demand. This presents a worst-case scenario should the other developments' construction timeframes overlap, however, in reality this is unlikely and the significance level identified would be reduced. When considering cumulative effects with other renewable generation projects with the Proposed Development during the operational phase, there would be a beneficial cumulative effect on climate change through the contribution to the UK's legally binding emission reduction targets.<br><br>**ES Chapter 18: Summary [APP-075]** section 18.6 concludes in-combination effects during all phases of development. Table 18.5 and Table 18.6 provide a qualitative assessment of the in-combination effect interactions on receptor groups. Construction and decommissioning have been presented together because the types of effect interactions would be broadly the same with decommissioning effects likely to be less significant than the construction phase. No significant adverse in-combination effects have been identified. |
| RR-035/7 | STEP Fusion | The site of the former West Burton 'A' Coal Fired Power Station (currently in the process of decommissioning), to the immediate north of Sturton le Steeple has been selected by The UK Atomic Energy Authority (which is fully funded by the Department for | Sections 4-7 of the **Planning Statement [APP-182]** set out Applications for solar NSIPs are required to be determined in accordance with NPS EN-1, EN-3 an EN-5. These NPSs and other national energy policy set out the UK Government's aim for a |

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| | | Energy Security and Net Zero (https://step.ukaea.uk/)) as the location for the UK's flagship STEP nuclear fusion programme. Construction of the plant is expected to follow demolition of the power station (which is due by 2028) and first operations of STEP facility are targeting for 2040.<br>The fact that the UK government has confirmed £2.5bn by way of investment into the project over the next five years is a very clear indication that the project will go ahead notwithstanding that the NSIP examination process has not yet commenced. The construction of the fusion plant will dominate Sturton le Steeple and the local area over the next 15 years.<br>The local community has welcomed STEP to the area on the basis that it will bring investment and regeneration, development of local skills and employment. Sturton le Steeple and the wider local community have supported energy and mineral extraction for decades and continue to do so where it brings credible long term economic benefit to the area and its impacts have been relative to the footprint versus contribution to national need.<br>That, however, is not the case in terms of the Proposed Development (see further below). Table 1 compares the energy output anticipated by the Applicant with that of previous and existing energy facilities to highlight the significantly lower output of the Proposed Development as compared to previous projects. | secure, long term, reliable, resilient, affordable and low-cost energy supply generated in the UK whilst, at the same time, decarbonising the energy system. The UK is legally bound and committed to reducing its carbon emissions and achieving net zero by 2050. A shift in energy generation to renewable sources is a driving force behind meeting this target.<br><br>Furthermore, the UK Government recognises the immediate urgent need to deliver its aims and commitments, including large scale solar (and associated development such as BESS) projects, which are Critical National Priority ('CNP') infrastructure.<br><br>The Government are fully committed to moving away from fossil fuels to generate electricity, notably West Burton A Coal Fired Power Station is close and in the process of decommissioning that resulted in capacity on the National Grid Electricity Transmission System in this location. Furthermore, England's last coal fired power station at Ratcliffe-on-Soar closed on the 30th September 2024.<br><br>The first bullet point of Paragraph 5.1.3 from the **Planning Statement [APP-189]** confirms the Proposed Development will generate 600MW of low carbon electricity equating to the annual energy consumption of approximately 180,000 households (roughly half of the homes in Nottinghamshire) and is anticipated to be operational by October 2029. |

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| | | **Table 1**<br><br>| | Hectare | Homes | Per Hectare |<br>| --- | --- | --- | --- |<br>| West Burton A (coal fired) (50 years) | 203 | 7,200,000 | 35,468 |<br>| Weston Burton B (gas fired) (25 years) | 30 | 2,900,000 | 96,667 |<br>| Proposed Development (expected 40 years) | 888 | 180,000 | 203 | | This would compensate, in part, for the loss of electricity power generated by the former West Burton A Coal Fired Power Station. Based on the comments provided the STEP nuclear fusion projects operational target date of 2040 is roughly 11 years after the Proposed Development and both are needed to achieve Net Zero by 2050. |
| RR-035/8 | National Grid Humber to High Marnham Upgrade | Likewise, National Grid's anticipated Humber to High Marnham Upgrade (the "Grid Upgrade") is a project that will be very significant in terms of its scale and impact on Sturton le Steeple, and therefore should be factored into the Applicant's Cumulative Impact Assessment in respect of the Proposed Development. The Grid Upgrade is part of the national Great Grid Upgrade and is currently in the preapplication stage for a DCO. The new overhead power line supported by pylons, which according to National Grid Design Development Report (https://www.nationalgrid.com/document/154031/download) will be between 41m and 51m in height is proposed to pass directly to the north-east of Sturton le Steeple (shown by way of the purple line on the below map] and significantly closer to properties in the village that where it passes other settlements along the proposed route as shown on National Grid Interactive Map for the Humber to High Marnham Great Grid Upgrade. | Please see above for a summary of the relevant policy on cumulative assessment.<br><br>**ES Chapter 2: Environmental Impact Assessment Methodology and Public Consultation [APP-060]** sets out the general assessment approach for the ES Chapters and Table 2.8 setting out the Zone of Influence identified for the Cumulative Effects Assessment of each Environmental Topic.<br>**ES appendix 2.3 provides a Cumulative Sites Long List and Short List [APP-088]** with North Humber to High Marnham OHL NSIP identified as ID 2 and a Tier 2 project in Table 1.2 - Cumulative Sites Long List as well as no.14 and Tier 2 in Table 1.3 Short List of Cumulative Schemes. It has been considered as part of the cumulative assessment within each chapter of the ES.<br><br>**ES Chapter 18: Summary [APP-075]** section 18.5 concludes on cumulative effects during all phases of development. In summary, the assessment of cumulative effects has considered the potential for effects from other developments in the area to combine with and intensify effects caused by the Proposed Development. Significant cumulative residual effects are |

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| | | | identified for ecology and biodiversity, socio-economics and climate change. In regard to ecology and biodiversity, a local to district level significant adverse cumulative effects anticipated for breeding skylark birds. There would be significant beneficial effects on employment and economic contribution as a result of the combined effect of the Proposed Development with other developments during the construction, operation and decommissioning phases. During the construction phase a significant adverse cumulative effect is identified for accommodation demand. This presents a worst-case scenario should the other developments' construction timeframes overlap, however, in reality this is unlikely and the significance level identified would be reduced. When considering cumulative effects with other renewable generation projects with the Proposed Development during the operational phase, there would be a beneficial cumulative effect on climate change through the contribution to the UK's legally binding emission reduction targets.<br><br>**ES Chapter 18: Summary [APP-075]** section 18.6 concludes in-combination effects during all phases of development. Table 18.5 and Table 18.6 provide a qualitative assessment of the in-combination effect interactions on receptor groups. Construction and decommissioning have been presented together because the types of effect interactions would be broadly the same with decommissioning effects likely to be less significant than the |

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| | | | construction phase. No significant adverse in-combination effects have been identified. |
| RR-035/9 | Alternative sites | Whilst FFF has not yet, in the very limited time available for registration comments been able to consider the suggested suitable alternative sites considered by the Applicant (in document EN010163/APP/6.2.1), an initial assessment indicates that they may not warrant scrutiny. For example, some have already been rejected by other developers or on grounds that could equally apply to the Proposed Development (e.g. use of BMV land and/or within Flood Zones) and it is noted that one site has been discounted on grounds of proximity to Clumber Park, but other solar arrays have been permitted in this area.<br>FFF intends to review the alternative proposals in detail to assess their credibility and/or reasons for their being discounted by the Applicant. | Alternative Sites have been considered, as detailed **ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** as well as the **Flood Risk Sequential Assessment and Exception Test [APP-186 to APP-189]**.<br>Three alternative sites were identified<br>• Site A – land between Worksop and Retford – approximately 1408.3 ha and is located approximately 12.3km from the Point of Connection at West Burton A Power Station.<br>• Site B – land south of Gringley on the Hill - approximately 754.5 ha in size and located 5.6km from the Point of Connection at West Burton Power Station.<br>• Site C – Land around Northorpe - approximately 1159 ha in size and is located 11.5km away from the Point of Connection at West Burton Power Station.<br>Site A is near Clumber Park and Paragraph 3.5.24 of **ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** states "*cumulatively, with Site A being at risk from 3 sources of flooding instead of just 2, the degree of significance of the heritage constraint to Clumber Park and also the potential harm the development could cause to the immediate surroundings of the Clumber Park SSSI, Site A has been discounted as a suitable alternative site for the proposals*". |

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| | | | However, all three alternative sites are less sustainable and viable in a sequential sense when compared to the **Order Limits [APP-009]** of the Proposed Development. |
| RR-035/10 | Alternatives and Site Selection | EN-3 expects applicants to explain site choice and to show preference for:<br>• Brownfield, industrial and contaminated land;<br>• Low and medium-grade agricultural land over BMV;<br>• Configurations that allow continued agricultural use and co-location (to maximise land-use efficiency).<br>Given the extensive area and the evident BMV constraint at the area proposed for the Proposed Development, there is a clear policy expectation to demonstrate why capacity could not be delivered across a portfolio of non-BMV/industrial sites or rooftops, or via a re-design that avoids BMV and the most sensitive hydrological cells. | The **Planning Statement [APP-182]** considers NPS EN-3 and sets out there are no reasonable available suitable alternative brownfield sites or roof tops that would provide the same scale of renewable energy as the Proposed Development.<br><br>**ES Chapter 15: Land Use and Agriculture [APP-072]** has had regard to agricultural land quality and identified the grade of land within the Order Limits excluding the cable route and ecological mitigation areas. **ES Appendix 15.1 Agricultural Land Classification Report [APP-131]** provides more detail of the land classification within the Order Limits and **ES Appendix 15.2 Outline Soil Management Plan [APP-132]** details how soil within the Order Limits will be managed for the lifetime of the Proposed Development.<br><br>Approximately 72.1% of the land within the Order Limits forms BMV land. However, the Proposed Development will only result in temporary disturbance of approximately 12.1 ha of BMV agricultural land. This land will not be lost, in that it is all capable of restoration to a comparable grade at the decommissioning phase. The works require the removal of topsoil, its storage in suitable conditions, and its replacement following the removal of the fixed equipment. None of the fixed equipment requires deep foundations, and mostly only topsoil requires to be stripped off |

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| | | | and stored. The Applicant has followed guidance in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra (2009). The reinstatement to comparable soil properties and land grade would be undertaken in accordance with a Soil Management Plan secured by Requirement 11 of the **dDCO [APP-041]**, with regard to the measures stated within **ES Appendix 15.2- Outline Soil Management Plan [APP-132]**.<br>The Applicant has sought to minimise impacts on BMV land through the design of the Proposed Development (as previously mentioned) and ALC ratings as well as agricultural land productivity. This includes through discussions with landowners and minimising the impact of the Proposed Development on the landowners' wider land holdings. For example, whilst approximately 640 ha of the order limits forms BMV land only 12.1 ha of BMV land will be temporary disturbed.<br>Effectively the Proposed Development minimises impacts on agricultural land, retaining the ability to reinstate arable agricultural land after decommissioning as well as allowing soils to rest in the interim.<br><br>Panel areas will still support grazing through biodiversity management and therefore continue to contribute as an agricultural resource. However, it is noted that food security and food production isn't a relevant consideration under the NPS. |

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| | | | In accordance with paragraph 5.11.12 of NPS EN-1 the Applicant has demonstrated that the Proposed Development minimises impacts upon BMV land and in accordance with paragraph 5.11.34 of NPS EN-1 the development is justified on BMV agricultural land due to the fact there are insufficient areas of available non-BMV land without constraints on which to accommodate the whole Proposed Development.<br><br>Furthermore, in accordance with Paragraph 5.11.12 of NPS EN-1 the Proposed Development will minimise impacts on the best and most versatile agricultural land by not lead to any permanent loss of BMV land within the Site.<br><br>Use of BMV land within the Site is justified by NPS EN-1 paragraph 5.11.34 due to factors related to site location and context within the Proposed Development, wider landholding and in relation to adjacent and surrounding land. The reason for retaining some areas of BMV land in general is because it forms part of larger fields of lower grade land and would not be practical to remove this from the Proposed Development in terms of layout or continue to farm as small, isolated land parcels.<br>At the start of construction arable management of land within the development limits will cease for the duration of the temporary development. |

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| | | | During operation, grass below and between the panels will need to be managed such as through grazing by livestock where appropriate.<br><br>Upon decommissioning, above ground physical infrastructure and any sub surface mounting structures will be removed, the Site will be returned to its current state. It is assumed hedgerows, trees and woodland will be retained.<br><br>Significant public benefits of the Proposed Development outweigh the reversible use of 72.1% BMV agricultural land for the duration of the Proposed Development, particularly noting NPS EN-3 paragraph 2.10.29 that states land type should not be the predominant factor in determining suitability of a site for solar development. |
| RR-035/11 | Ecology and Biodiversity | The Proposed Development prioritises grid connectivity over ecological and social impacts, neglecting the cumulative effects of multiple similar projects across the River Trent region. The Steeples Renewables Project Environmental Statement (Volume 6) reveals survey access limitations, data gaps from incomplete assessments, and risks of habitat loss/fragmentation impacting protected species and biodiversity. Invasive species, poor habitat conditions, and inadequate mitigation threaten project sustainability. Details are highlighted below: | The Applicant notes and disagrees with this comment. **ES Chapter 7: Ecology & Biodiversity [APP-065]** includes an assessment of the Proposed Development's impact on ecological receptors supported by extensive survey work to confirm the ecological habitats and species that are likely to be affected by the Proposed Development.<br><br>A range of 'designed-in' primary ecological mitigation, compensation and enhancement measures are part of the design of the Proposed Development (refer to section 7.7 of **ES Chapter 7: Ecology & Biodiversity [APP-065])**. Biodiversity features have been considered iteratively as the detail of the Proposed |

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| | | | Development has evolved, and the incorporated biodiversity measures form an integral part of the Proposed Development, designed specifically to avoid or reduce biodiversity effects wherever possible, and to build biodiversity enhancement into the Proposed Development.<br><br>An overview of work necessary to retain, create and manage retained and new ecological features during and after construction are provided in **ES Appendix 4.1 - outline Construction Environmental Management Plan (oCEMP) [APP-089]** and **ES Appendix 7.14 outline Landscape Ecological Management Plan (oLEMP) [APP-116]** for the Proposed Development. Requirements 6 and 7 of the dDCO ensure that the authorised development cannot commence until a CEMP and LEMP are approved by the local planning authority for that phase of works.<br><br>Substantial new tree and hedgerow planting is also proposed, which will provide new linear habitat linkages between habitat features (refer to **Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160]**). Any trees subject to development impacts during construction will be subject to further inspection, survey and necessary steps to avoid or minimise impact. The Applicant has specified this in the **oCEMP [APP-089].** As per Requirement 7 of the dDCO [APP-041], the authorised development cannot commence until a CEMP is approved by the local planning authority. The CEMP must be in |

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| | | | accordance with the oCEMP. **ES Appendix 7.12 Biodiversity Net Gain Report [APP-114]** sets out the results of the Proposed Development's BNG assessment and concludes an overall net gain of at least 10%.<br><br>Part of the Proposed Development's design is the principle of BNG with areas identified for habitat creation and enhancement. In addition to the above, land below and between the PV arrays will be subject to modified grassland creation to deliver greater biodiversity value compared to a baseline of arable crops – this habitat creation has been specified in the **oLEMP [APP-116]**, and its delivery is ensured via requirement 6 of the **dDCO [APP-041].**<br><br>After decommissioning, land will be restored back to open farmland. Following the decommissioning, the consent does not require the ecological mitigation (i.e. the habitats) to be maintained beyond the 40-year consented period.<br>An appropriately qualified ecologist will visit the site and identify ecological constraints from decommissioning activities no more than twelve months prior to decommissioning commencing. As a minimum an extended habitat survey is considered likely to be required to identify potential presence of protected species and important habitats that exist at that time. Further surveys, mitigation and compensation measures may be required in line with statutory or relevant guidance in advance of /at decommissioning stage. Commitment to undertake this is ensured via Requirement 21 of the dDCO, which specifies the |

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| | | | need for an updated decommissioning plan that accords with the **outline Decommissioning Plan [AP-090]** that has been prepared. |
| RR-035/12 | Ecology and Biodiversity/ Breeding Birds | Survey limitations in 2023, restricted to public rights of way, hindered detection of hedgerow nesting species. Post-survey boundary changes added unsurveyed areas (11 ha, 1.2% of site), including West Burton Power Station and roads, potentially underestimating nesting suitability.<br>Adverse impacts include displacement risks for peregrine falcons from power station demolition, potentially shifting to on-site structures. Suboptimal habitats in Proposed Solar Areas limit nesting for lapwing and meadow pipit due to insufficient rough grassland. Livestock grazing at Littleborough Lagoon reduces wetland suitability for breeding birds.<br>Data gaps include weather disruptions in 2024 (wet conditions, waterlogged fields, spring sowing), reducing skylark territories from 105 to 90. Lack of regional population estimates limits site importance assessment. Construction may disturb breeding, posing biodiversity risks. | For transparency to the reader, each ecological baseline report (i.e. **ES Appendices 7.3 to 7.12 [APP-105 to AP-114]**) includes a section giving consideration to any potential limitations to the survey methods and whether these are significant. In respect of the bird surveys, the surveys were repeated in 2024 once complete access to the Site became available. West burton power station and the existing roads will not be subject to habitat changes from the Proposed Development (i.e. there will be no impact to birds that may use these areas).<br><br>Nevertheless, the bird survey transect passed to the south of the power station and liaison with site staff (and ecologists working on behalf of the power station) was undertaken to understand what bird species were present. Information about sensitive species has been withheld from the public domain to protect such species.<br><br>Regarding weather conditions in 2024, it should be noted that the 2023 survey results did record higher numbers of skylark than did the 2024 survey. This this has been taken into considered when undertaking the impact assessment (**ES Chapter 7: Ecology & Biodiversity [APP-065]**). The assessment included consideration of local records, and the status of birds in Nottinghamshire (with |

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| | | | liaison from the Nottinghamshire Birdwatchers) when assessing the risks to breeding birds. |
| RR-035/13 | Ecology and Biodiversity/ Wintering Birds | Partial access in two areas, surveyed from rights of way, and post-survey boundary changes (excluding some surveyed zones, adding unsurveyed areas such as the site of West Burton Power Station) create data gaps. The power station has limited bird suitability due to disturbance.<br>The Proposed Development threatens 42 conservation-concern species (e.g., red/amberlisted starling, fieldfare, linnet) reliant on arable fields and hedgerows. Wetland alterations in the flood-prone Eastern Biodiversity Mitigation Area could impact waterbirds like wigeon and lapwing. Rare species (e.g., hen harrier, short-eared owl) near River Trent corridors and high diversity wetlands face disturbance risks from habitat changes. | Please see response above. The areas that had partial access in 2023 were subject to access and survey in 2024. As noted above, the areas added to the application boundary are not anticipated to undergo adverse habitat changes, and adverse impacts in relation to wintering birds are not likely to occur.<br>Adverse impacts on hedgerows have been minimised (98.5% of hedgerows will be retained) meaning that impacts on birds in hedgerows have been minimised (refer to paragraphs 7.8.47 and 7.8.87 of the **ES Chapter 7: Ecology & Biodiversity [APP-065])**. In addition, 25.3 km of new hedgerows will be created, which is expected to result in a beneficial impact on birds that rely on hedgerows, albeit not to a significant level (refer to paragraph 7.8.98 of the **ES Chapter 7: Ecology & Biodiversity [APP-065])**.<br><br>The wetland alterations in the Eastern Biodiversity Mitigation Area have been developed through liaison between the Applicant and Nottinghamshire Wildlife Trust and the ecology officers from the district and county councils (meetings held with NWT on 5 February 2025, and with local authority ecologists on 07 November 2024, 4 March and 5 March 2025). Farmland and wintering bird species are considered to benefit from the proposed changes as more habitat structure and diversity will be introduced compared to current conditions. |
| RR-035/14 | Ecology and Biodiversity/ Bats | The RES survey omits emergence/re-entry surveys for trees and buildings with moderate/high bat roost potential, violating Bat | Figure 2.1 of the Bat Conservation Trust Good Practice Guidelines (4th edition) indicates that no further bat surveys, such as bat |

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| | | Conservation Trust's Good Practice Guidelines (Collins, 2023). This risks disturbing/destroying legally protected bat roosts. Suboptimal weather (temperatures 8%) compromise survey reliability.<br>Low numbers of Barbastelle (Annex II, Habitats Directive; UK Biodiversity Action Plan) and Nathusius' pipistrelle bats are noted, yet the report dismisses site significance, potentially requiring a European Protected Species (EPS) licence.<br>Cumulative impacts from adjacent developments, like the nearby quarry scheme, are ignored, conflicting with Environmental Impact Assessment Regulations 2017.<br>Assumptions about off-site roosts (e.g. REDACTED) lack evidence, and indirect impacts (lighting, noise, habitat fragmentation) along the River Trent corridor require rigorous assessment.<br>A study by the University of Bristol/Journal of Applied Ecology covering existing solar sites in the southwest of England recorded significantly lower bat activity across solar farms versus base control sites outside the solar farms. The full title of this study is "Renewable Energies & Biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity" | emergence surveys, are required where there is no reasonable likelihood that bats could be impacted. This is in line with normal EIA practice. All trees in the development area were subject to ground level tree assessment (GLTA) and all buildings were subject to preliminary roost assessment (PRA) to ascertain which features have suitability for roosting bats. All features with suitability to support bat roost have been avoided by design so that they may be retained and protected.<br><br>Sufficient survey effort has been applied in line with the Bat Conservation Trust Good Practice Guidelines.<br><br>The study by the University of Bristol/Journal of Applied Ecology was considered when designing the bat activity surveys. To reflect the findings of that study, the use of 'paired' static bat detectors was employed – as recommended in the study. The survey found that low levels of bat activity were recorded in the arable fields (areas that arrays will be placed), and that most activity was associated with the hedgerows, field drains and woodlands. The impact assessment concluded that the operation of the solar farm could give rise to impacts to bats at a Site level – but, following the proposed mitigation and habitat enhancement measures (which include protection, enhancement and creation of habitats (refer to paragraphs 7.8.151 to 7.8.155 of **ES Chapter 7: Ecology and Biodiversity [APP-065])**, residual impacts would be beneficial, significant at the Local level. The habitat protection, creation and enhancement measures are |

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| | | | secured via Requirements 6 (LEMP) and 7 (CEMP) of the dDCO, to be approved by the local planning authority prior to commencement of development for that relevant phase, and which must be in accordance with the **outline LEMP [APP-116]** and **outline CEMP [APP-089].** |
| RR-035/15 | Ecology and Biodiversity/Otters and Water Voles | Weather in April 2024 and dense vegetation in ditches (DD8, CD1(D)) obscured survey signs, potentially lead to misleading evidence. Bankside cutting and drain maintenance may have displaced mammals or destroyed signs.<br>No confirmed water vole signs despite historical records and suitable habitats; indeterminate burrows remain unverified. Sparse otter spraints were recorded, with no natal sites identified. Impacts on commuting habitats in mitigation and solar areas conflict with species protection needs. | For transparency, each ecological baseline report **(i.e. ES Appendices 7.3 to 7.12 [APP-105-APP-114])** includes a section giving consideration to any potential limitations to the survey methods and whether these are significant. Rain, vegetation growth, and bankside mowing are regular occurrences on the ditches and form part of the baseline environment, and these influences were taken into account when assessing the suitability of the watercourses to support otter and water vole (**ES Appendix 7.9: Otter and water vole report [APP-111]**). The rain levels from nearby weather stations were checked by the surveyor ahead of each survey, with weather station information and forecasts reviewed to determine whether there was potential for field signs to be washed away. During the survey, field signs of other mammals, including rat, mouse, and small voles, were observed *in situ* meaning that mammal fields signs remained present for the surveys. Small burrows and small droppings (i.e. characteristic of field/bank vole) were also observed in areas that had been subject to recent bankside cutting. It is acknowledged that bankside cutting may have destroyed other less deterministic signs such as feeding evidence. However, a precautionary evaluation of species presence was undertaken, |

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| | | | which referred back to historic records to assume water voles are present.<br>Sparse otter spraints were recorded in waterways. Areas of habitat suitable for resting otters were searched. All areas of habitat suitable for resting sites (such as woodland and scrub near waterways) will be retained. Impacts on otters were assessed in paragraphs 7.8.169 to 7.8.172 of **ES Chapter 7: Ecology & Biodiversity [APP-065]** and concluded that no significant adverse impacts to otters are likely to arise. |
| RR-035/16 | Ecology and Biodiversity/Great Crested Newts | Inaccessible off-site ponds (e.g., Ponds 6, 13, 15, 18 within 250 m) lack HSI/eDNA data, creating uncertainty about GCN presence (closest pond 25 m from site). Poor terrestrial habitat in arable fields from agricultural pressures limits shelter and movement. Unassessed ponds near solar areas pose risks to potential GCN populations, despite eDNA absence in surveyed waterbodies. These findings are supported by the Nottinghamshire Wildlife Trust by way of an email dated 20th August 2025 to FFF including stating "On a precautionary basis, as they are mobile species, the possibility of presence in very localised areas of the Site around Ponds 15 and 18 should be considered and appropriate mitigation implemented" | Paragraph 7.8.196 of **ES Chapter 7: Ecology & Biodiversity [APP-065]** provides information about Ponds 15 and 18, setting out the reasoning as to why no offence in respect of any great crested newts that may be associated with these ponds is likely to arise (primarily relating to the distance to planned ground disturbance, rather than distance to red line boundary of the Site). Nonetheless, additional precautionary measures are set out in the outline **oCEMP [APP-089]** for undertaking updated great crested newt surveys prior to construction, and precautionary checks for amphibians should any clearance of suitable vegetation within 250 m of Ponds 15 and 18 become a requirement. These are precautionary measures only. |
| RR-035/17 | Ecology and Biodiversity/ Aquatic Invertabrates | No recent records of rare species (last from 1999–2002), with 2024 surveys missing species like Agabus uliginosus. Invasive species (Chinese mitten crab, zebra mussel) near the site threaten native assemblages. No new Local Wildlife Sites qualify, | The evaluation of the aquatic invertebrate assemblage placed weight on the desk study information and assumed that *Agabus* spp. were present despite the species not being observed during the field survey. As a result, landscape enhancements have been specifically targeted to increase the quality of the habitats for |

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| | | with Mother Drain falling short. High-diversity ditch ED8 (40 species) faces disruption risks from solar development. | this species group; including the creation of shallow ponds that have a nearby source of leaf litter next to the local wildlife site.<br><br>While the ecological desk study returned historical records of aquatic invertebrate invasive species, it is not considered likely that the Proposed Development will cause these invasive species to spread locally based on the construction controls that will be in place.<br><br>The aquatic invertebrate assemblage has been assessed in **ES Appendix 7.11 Aquatic Invertebrates Report [APP-113]**. Impacts to ecological receptors were assessed in the **ES Chapter 7: Ecology & Biodiversity [APP-065]**. |
| RR-035/18 | Ecology and Biodiversity/Skylark | Skylarks, red-listed with a 63% population decline (UK Birds of Conservation Concern; Bett's Ecology Reports), face loss of all 97.5 territories due to solar arrays deterring nesting. Mitigation yields only 58 new territories (55–64% compensation), insufficient given prior declines. Increased nest predation risks in margins and the absence of pre/post-construction monitoring hinder impact assessment and adaptive management, potentially exacerbating negative effects on ground-nesting birds. | A full environmental impact assessment has been undertaken to inform the Planning Inspectorate's decision – in summary, it was concluded that adverse displacement effects on skylark may be significant at a local level (**ES Chapter 7: Ecology & Biodiversity [APP-065]**). To minimise the displacement risk, the skylark mitigation strategy has been prepared (**ES Appendix 7.13 Skylark Mitigation Strategy [APP-115]**), which includes proposals to increase the carrying capacity of the arable land in the biodiversity mitigation areas for skylark by creating conditions that could allow an estimated 58 skylark breeding territories to be created on arable land, and a further (conservatively estimated) 5-6 territories on other land. |

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| RR-035/19 | Ecology and Biodiversity/Brown Hares | Brown hares, protected under the Wildlife & Countryside Act 1981, are entirely omitted from RES documentation despite sightings recorded by Nottinghamshire Biological & Geological Records Centre, Nottinghamshire Wildlife Trust, iRecord, and iNaturalist. Local monitoring over a 14 day period in August 14 sightings and video evidence is available.<br>Local farmland supports breeding and feeding, but construction and maintenance will disrupt nesting sites and feeding grounds. Fencing and panel layouts restrict movement, reducing genetic diversity, reduce breeding success and increasing resource competition. (See Conserving the Brown Hare by Game & Wildlife Conservation Trust)<br>Solar Habit: Ecological trends on solar farms in the UK report page 35 indicates the ad hoc sightings of foxes, hares and other mammals creating a common ecological concern of increased predation risks (e.g., foxes using panels for ambushes), contradicting claims of panels providing shelter. https://solarenergyuk.org/wp-content/uploads/2023/06/SolarHabitat-Report-2023.pdf | Mammals that are species of principal importance (including brown hare) were assessed in **ES Chapter 7: Ecology & Biodiversity [APP-065]**). Brown hare was recorded on Site by the project ecologists and is assumed to be present and widespread in suitable habitats. The species was assessed as being of importance at the local level.<br><br>It is proposed that strategically placed mammal gaps are created in the fencing to allow species such as badgers, brown hare, hedgehogs to access the grasslands throughout the array areas (as set out in the **Outline CEMP [APP-089],** which will be mandated as per Requirement 7 of the dDCO). The locations of the mammal gaps in the fence will be determined by an Ecologist based on up-to-date survey data ahead of construction.<br><br>**ES Chapter 7: Ecology & Biodiversity [APP-065]** provides context that mammals are likely to use existing hedgerows, grassland margins, scrub and woodland for shelter (e.g. at paragraphs 7.6.181 and 7.6.183), and that provision of more hedgerows, woodland and habitat piles will increase shelter provisions (e.g. paragraph 7.8.260). It is not claimed that arrays provide shelter habitat. |
| RR-035/20 | Ecology and Biodiversity/Barn Owls | The barn owl report, initially included in the RES portal but removed due to the species' protected status, lacks comprehensive nest confirmation, undermining impact assessment. Solar development risks disturbing active nests, with preliminary data failing to quantify risks. Inconsistent | All trees (i.e. all tall woody plants with a stem diameter of more than 6cm) and buildings on Site were subject to an assessment from ground-level to identify whether they have suitability for roosting/nesting barn owls. |

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| | | sighting data and lack of methodological transparency may underrepresent habitat disruption impacts on foraging and breeding success.<br>The report's reliance on outdated data and failure to confirm recent nesting activity risks unassessed impacts on breeding sites. Barn owls, protected under the Wildlife and Countryside Act 1981, face illegal disturbance risks without confirmed absence or mitigation. Limited access to and unconfirmed nesting in and trees heighten risks. Poor report quality (OCR errors, truncated text) compromises credibility and ecological data accuracy. | At least two barn owl territories were assessed as being present on Site and impacts to these had been assessed and concluded a residual beneficial effect to the species at a local level (refer to paragraphs 7.8.114 to 7.8.120 of **ES Chapter 7: Ecology & Biodiversity [APP-065]**). Barn owls may change nesting location from season to season. Specification of the detailed measures needed to avoid causing a disturbance offence will be identified close to the time of construction via inspection of all potential nest sites (to identify which potential nests sites are active in a given year). Following this inspection, the location of nests and how they related to the construction activity programmed for that particular season will be confirmed (and re-verified throughout construction) and measures will be put in place to avoid disturbance to nesting or dependent young. |
| RR-035/21 | Ecology and Biodiversity/Badgers | The badger report, initially included but removed due to protected status, identifies 62 active setts and 9 possible setts, critical for breeding and population stability under the Protection of Badgers Act 1992. Fluctuating sett use highlights badgers' mobility and habitat dependency, emphasizing ecological importance. Development risks long-term disruption. Survey limitations (50m buffer not consistently applied due to private land, power stations, railways, and dense scrub) likely underestimate badger activity. Incomplete coverage and reliance on visible signs (spoil, tracks) may miss underground sett complexity, risking infringement on badger territories. The report lacks clear mitigation or monitoring plans, likely violating the Protection of Badgers Act 1992. | Section 7.8.165 of **ES Chapter 7: Ecology & Biodiversity [APP-065]** is considered to be accurate, and the previous section 7.8.158 is superseded – some badger setts may be closed under licence to eliminate risk of injury to badgers from construction activity. The Applicant will update the ES accordingly during the Examination.<br><br>Avoidance zones have been defined, which take into account the uncertainty of underground sett architecture (i.e. covering up to 30m from the sett entrance). A blanket avoidance area has also been identified along railway tracks, and other areas where sett building activity could not be safely surveyed. |

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| | | The Nottinghamshire Wildlife Trust has agreed with FFF by way of an email dated 20th August 2025 that the report provides a confusing strategy and includes several contradictions and they will be requesting clarity on the strategy for badger setts within and adjacent to the site. | These avoidance zones have been built into the design and adhered to in almost all cases (a total of 80 sett features have been recorded). No infrastructure will be placed directly over a sett; however, based on the current designs and distribution of badger activity, a number of sett protection areas (i.e. avoidance zones) cannot be wholly avoided and will require further mitigation measures. The scale of the interactions are anticipated to change based on the mobile nature of badgers and their ability to create new setts quickly, but also as a result of avoidance measures that will be incorporated during the detailed design of the Proposed Development (such a micro siting fence lines or using no-dig techniques).<br><br>13 outlier sett protection areas may clash with infrastructure - 6 of these are attributed to cable corridors, which have not yet been designed in detail and which may be possible to microsite away from badger setts. The remaining outlier setts potentially clash with security fencing and these will be considered further following updated survey and consideration of detailed fencing options to minimise the need to close any of these outliers.<br><br>We are currently liaising with Natural England, and a draft badger licence application will be submitted to Natural England. The draft licence application will include an outline badger method statement , that will include realistic worst-case mitigation measures to protect badgers. |

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| | | | The locations of the mammal gaps in the fence will be determined by an Ecologist based on up-to-date survey data ahead of construction, as specified in Table 3.3 of the **Outline CEMP [APP-065]**, which will be updated and implemented as required by Requirement 7 of the dDCO. It is anticipated that reinforced gaps will be created in the fencing instead of gates, as these allow other smaller mammals, such as hedgehogs and brown hare to pass though and they are less likely to get jammed shut. |
| RR-035/22 | Ecology and Biodiversity | The RES report consistently shows survey limitations, data gaps, and risks of habitat loss/fragmentation impacting protected species (e.g., bats, barn owls, badgers, brown hares) and biodiversity. Legal non-compliance (e.g., Environmental Impact Assessment Regulations 2017, Protection of Badgers Act 1992, Wildlife and Countryside Act 1981) and inadequate mitigation (e.g., skylark territories, bat roosts) threaten ecological sustainability. Cumulative impacts from regional developments and invasive species further exacerbate risks, undermining the project's viability and justifying opposition to the solar farm agreement.<br>We have concerns that RES will not introduce adequate mitigations - there is no plan for wildlife corridors, no clarity regarding the management of biodiversity, the 9 fields set aside for skylarks are not clearly defined and with the extensive reduction in local farmers there is a real danger that this will never happen. | The concerns on survey limitations and assessment are addressed above. The mitigation will be delivered and subject to monitoring against specified targets) outlined in the **Outline LEMP [APP-115].** This will be secured by Requirement 6 of the dDCO, which requires a final LEMP to be submitted for approval prior to works commencing. Any failures to meet the targets specified in the LEMP will be reported and actioned by RES. Regarding adequate mitigations, the new habitat provisions are presented on **Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160]**, which shows the locations of ecological mitigation areas and the planting of a hedgerow corridor across the site. The fields to be managed for skylark are further clarified in the **Appendix 7.13 Skylark Mitigation Strategy [APP-115]**. The outline of the management and monitoring of the habitats is provided in the **Outline LEMP [APP-115],** which includes the proposed management of the arable cropland**.** The outline LEMP will inform the LEMP secured by Requirement 6 of the dDCO. |

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| | | Local councils reviewing existing solar projects managed by RES are providing negative feedback advising that many mitigations were never implemented and a failure to reach satisfactory performance against agreed targets. | |
| RR-035/23 | Flood Risk | Residents are concerned about that the Proposed Development will increase the risk of flooding within Sturton le Steeple and the surrounding areas, with flooding having occurred along the main road in the village on a number of occasions in recent years due to surface runoff from surrounding farmland.<br><br>The project area is known to be partially located within areas at risk of flooding, specifically Flood Zones 1, 2 and 3, which indicate a significant probability of flooding from the River Trent, surface water run-off and surrounding water courses. Whilst the proposed development may include measures to protect the infrastructure within the flood zones, there are concerns that this could displace flood water and potentially exacerbate flooding in the villages adjacent to the project or downstream areas of the Trent Valley. Flooding of Beckingham Marshes has been a regular occurrence in the last 25 years leading to road closures and significant impacts on traffic flows (very long diversions to next crossing points over the River Trent).<br><br>The Applicant must be required to show that the Proposed Development, even with the inclusion of Sustainable Drainage Systems (SuDS), needs to demonstrate that it will not increase surface water run-off rates from the site, or increased flow | With respect to the NPPF policies referenced by FFF, Paragraphs 171 & 172 relate to requirements for strategic policies / plans rather than individual development proposals. The key policy for flood risk for energy DCO projects is found in section 5.8 of National Policy Statements (NPSs) EN-1 and section 2.10 of NPS EN-3 for Renewable Energy Infrastructure DCO projects, although it is acknowledged that paragraphs 170 and 173 – 181 of the NPPF are broadly reflected in the NPSs.<br>With respect to concerns regarding potential increased flood risk to Sturton-le-Steeple, the Applicant acknowledges the recent flooding issues in Sturton-le-Steeple. Runoff from the Proposed Development will be managed through the use of Sustainable Drainage Systems (SuDS), whereby runoff will be intercepted by strategically positioned swales and contained within attenuation basins prior to a controlled discharge to local watercourses at greenfield rates. The drainage strategy has been designed to cater for the 1 in 100 year plus climate change event and has been developed in consultation with the Lead Local Flood Authority and the Internal Drainage Board. **ES Appendix 8.2 Surface Water Drainage Strategy [APP-120]** demonstrates that runoff rates will not be increased as a result of the Proposed Development and takes into account extreme (1 in 100 year) events as well as the permeability of the soils. The Construction |

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| | | velocities, thereby increasing flood risk or causing erosion. Residents are concerned about the effectiveness of these measures in controlling run-off, particularly during extreme weather events and given: the impermeable nature of the panels; (ii) soil compaction and potential damage to field drains during the construction phase; and (iii) the clay-based nature of the soil where it is planned the panels will be sited. The Food Risk Assessment ("FRA") appears to underestimate the cumulative impact of surface water runoff, particularly during extreme weather events when water is 'held back' to protect communities further up and downstream of the River Trent. The villages have experienced many flooding events in recent years and the FRA does not give due consideration to the surrounding villages. Further, the Environmental Impact Assessment (EIA) must consider and address the potential impacts of climate change on flood risk over the project's lifespan of up to 40 years. It is crucial to use robust climate change allowances and potentially higher risk scenarios in the flood risk assessment, especially given the scale of the project and the fact that there have been several large-scale floods from the River Trent in the recent past and also several severe localised flooding in the villages of North Wheatley, Sturton le Steeple and North Leverton.<br><br>The cumulative impact of this project, in conjunction with other developments in the area, on flood risk should be carefully considered, including potential changes to drainage patterns and water flows across the landscape. Several projects include | Environmental Management Plan (CEMP) (secured by Requirement 7 of the **dDCO [APP-041]**) will build on details provided in the **Outline Construction Environmental Management Plan (oCEMP) [APP-089]** and include measures for control of runoff during the construction phase and a commitment to repair any field drains damaged during construction.<br><br>In addition to ensuring there is no increase in runoff from the Proposed Development, the Applicant has committed to providing additional measures which aim to provide a positive reduction in the existing flood risk to Sturton-le-Steeple. This will be achieved by providing large detention basins positioned strategically to intercept existing flow paths and store runoff from the fields that currently flows uncontrolled towards the village resulting in flooding on the roads in the centre of the village. This is an additional voluntary measure for the benefit of the local community and is separate to the measures proposed to control runoff from the Proposed Development.<br>The cumulative impact of surface water runoff has been addressed in **ES Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066]**. Given there will be no increase in runoff from the Proposed Development (with a positive reduction in flood risk resulting from the flood reduction measures for Sturton-le-Steeple) and that other nearby developments will similarly be required to demonstrate no increase in flood risk, the cumulative impact is negligible. SuDS will be managed by the site |

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| | | alternative methods of managing water, but the EIA does not adequately address their combined impact with regard to robust mitigation, potential impact on the surrounding communities and land. West Burton Power Station and Sturton Quarry already have attenuation ponds as part of their mitigation and RES are proposing them here, this raises further queries as to how many attenuation ponds will be required, what their effectiveness will be and how the projects will effectively manage flood risk when they are under different management and their own operations will take precedence. The EIA does not demonstrate that there are no preferable alternative sites with a lower flood risk.<br><br>It is also noted that in the Draft Outline Construction Traffic Management Plan EN010163/APP/6.3.13 that RES are proposing a Wheel Washing Programme, given the high volume of vehicles involved in the construction this may compound water management issues and potential flooding risk. | operator and detailed within the Operational Environmental Management Plan (secured by Requirement 9 of the **dDCO [APP-041])** that builds on details provided in the **Outline Operational Environmental Management Plan (oOEMP) [APP-092]**.<br><br>The Applicant acknowledges the location of the Proposed Development is within Flood Zones 2 and 3 and is at risk from surface water. The potential for displacement of floodwater has been considered within Section 8.1 of **ES Appendix 8.1 Flood Risk Assessment [APP-117 to APP-119]**. This explains that there is no built development within the defended 1 in 100 year plus climate change flood extent for the River Trent and therefore no loss of storage for the River Trent during this 'design' event. It also explains that the flood risk from other sources results in negligible flood depths in areas of proposed infrastructure, and that the infrastructure in these areas would comprise panel supports only which, due to their very limited cross-sectional area, would result in negligible displacement of floodwater. The Flood Risk Assessment considers the appropriate climate change scenarios over the 40-year lifetime of the development in accordance with current Environment Agency guidance "Flood risk assessments: climate change allowances" (last updated May 2022).<br><br>The **Flood Risk Sequential Assessment and Exception Test [APP-186 to APP-189]** demonstrates that there are no |

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| | | | reasonably available sites at a lower risk of flooding that would be suitable for the Proposed Development.<br><br>Impacts of wheel washing during construction would be managed via the CEMP, which would include temporary drainage measures for the construction phase to ensure there is no increase in flood risk. |
| RR-035/24 | Land Use | The Agricultural Land Classification (ALC) is the only approved grading system in England. Grades 1, 2 and Subgrade 3a are defined as BMV. EN-3 requires applicants to prefer lower-grade land and avoid BMV where possible; if agricultural land is used, they must justify site selection and mitigate soil impacts via a Soil Resources and Management Plan. Natural England's technical guidance (TIN049) and planning practice guidance require decision-makers to give weight to BMV and to consult Natural England on proposals leading to the loss of >20 ha of BMV.<br><br>For the Proposed Development, the Applicant's material indicates significant areas of Grade 2 and 3a within the Order Limits). On any reasonable reading, the scheme would remove a large working block of BMV soils from arable rotations for at least 40 years, which is a generation and a half. That timescale is functionally permanent within a Local Plan period and compromises inter-generational soil stewardship. | Paragraph 2.10.29 of NPS EN-3 confirms land type should not be a predominating factor in determining the suitability of the site location. Paragraph 2.10.30 of NPS EN-3 clarifies the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land. Paragraph 2.10.31 of NPS EN-3 recognises that at this scale, it is likely applicants' developments will use some agricultural land. Paragraph 2.10.32 of NPS EN-3 encourages co-location of other functions (i.e. solar and BESS) to maximise efficient land use.<br>**ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** and the **Design and Access Statement [APP-184]** detail the process the Applicant has followed for site selection and design review, including the consideration given to the use of brownfield land.<br>As set out therein, there are no preferable sites that are of sufficient scale to enable the construction of the Proposed Development on non-agricultural land, or land that is of a lower ALC grade without constraint. |

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| RR-035/25 | Food Security | DEFRA's UK Food Security Index 2024 (https://www.gov.uk/government/publications/uk-foodsecurity-index-2024/uk-food-security-index-2024) shows the UK food production-to-supply ratio has stabilised around 60% in the last decade. Against this context, policy requires a strategic approach to protecting productive land. DEFRA's Agricultural facts : East Midlands region records total agricultural output of £3.9bn in 2023, with wheat alone valued at ~£515m. On this evidence, removing a continuous 9 $km^2$ arable block from production for two generations has real economy-wide effects (cropping, haulage, storage, inputs, services) that short-term construction jobs cannot offset. The potential use of the land for sheep farming to co-exist with the solar arrays and the consequent "positive" outcome associated with this is inaccurate and misleading in relation to the site of the Proposed Development. The farmland that will be lost to panels is almost exclusively arable, which it is widely accepted cannot continue alongside solar. In any event, local solar installations that have sought to combine with sheep farming have been discontinued as unsuccessful (locally between the villages of Babworth and Upper Morton) and the design and layout of the proposed panels, together with the additional drainage requirements will militate against sheep farming. | **ES Chapter 15: Land Use and Agriculture [APP-072]** has had regard to agricultural land quality and identified the grade of land within the Order Limits. **ES Appendix 15.1 Agricultural Land Classification Report [APP-131]** provides more detail of the land classification within the Order Limits and **ES Appendix 15.2 Outline Soil Management Plan [APP-132]** details how soil within the Order Limits will be managed for the lifetime of the Proposed Development.<br><br>Approximately 72.1% of the land within the Order Limits forms BMV land. However, the Proposed Development will only result in temporary disturbance of approximately 12.1 ha of BMV agricultural land. This land will not be lost, in that it is all capable of restoration to a comparable grade at the decommissioning phase. The works require the removal of topsoil, its storage in suitable conditions, and its replacement following the removal of the fixed equipment. None of the fixed equipment requires deep foundations, and mostly only topsoil requires to be stripped off and stored. The Applicant has followed guidance in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra (2009). The reinstatement to comparable soil properties and land grade would be undertaken in accordance with a Soil Management Plan secured by Requirement 11 of the **dDCO [APP-041]**, with regard to the measures stated within ES Appendix 15.2- **Outline Soil Management Plan [APP-132]**. |

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| | | | The Applicant has sought to minimise impacts on BMV land through the design of the Proposed Development (as previously mentioned) and ALC ratings as well as agricultural land productivity. This includes through discussions with landowners and minimising the impact of the Proposed Development on the landowners' wider land holdings. For example, whilst approximately 640 ha of the order limits forms BMV land only 12.1 ha of BMV land will be temporary disturbed.<br>Effectively the Proposed Development minimises impacts on agricultural land, retaining the ability to reinstate arable agricultural land after decommissioning as well as allowing soils to rest in the interim.<br><br>The Applicant notes the comment made with respect of food production. Panel areas will still support grazing through biodiversity management and therefore continue to contribute as an agricultural resource. However, it is noted that food security and food production isn't a relevant consideration under the NPS.<br><br>In accordance with paragraph 5.11.12 of NPS EN-1 the Applicant has demonstrated that the Proposed Development minimises impacts upon BMV land and in accordance with paragraph 5.11.34 of NPS EN-1 the development is justified on BMV agricultural land due to the fact there are insufficient areas of available non-BMV land without constraints on which to accommodate the whole Proposed Development. Furthermore, |

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| | | | in accordance with Paragraph 5.11.12 of NPS EN-1 the Proposed Development will minimise impacts on the best and most versatile agricultural land by not lead to any permanent loss of BMV land within the Site.<br><br>Use of BMV land within the Site is justified by NPS EN-1 paragraph 5.11.34 due to factors related to site location and context within the Proposed Development, wider landholding and in relation to adjacent and surrounding land. The reason for retaining some areas of BMV land in general is because it forms part of larger fields of lower grade land and would not be practical to remove this from the Proposed Development in terms of layout or continue to farm as small, isolated land parcels.<br><br>At the start of construction arable management of land within the development limits will cease for the duration of the temporary development.<br>During operation, grass below and between the panels will need to be managed such as through grazing by livestock where appropriate.<br><br>Upon decommissioning, above ground physical infrastructure and any sub surface mounting structures will be removed, the Site will be returned to its current state. It is assumed hedgerows, trees and woodland will be retained. |

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| | | | Significant public benefits of the Proposed Development outweigh the reversible use of 72.1% BMV agricultural land for the duration of the Proposed Development, particularly noting NPS EN-3 paragraph 2.10.29 that states land type should not be the predominant factor in determining suitability of a site for solar development. |
| RR-035/26 | Landscape and Visual | Natural England's National Character Area 48 (Trent and Belvoir Vales) describes a low-lying, strongly rural, predominantly arable landscape with long, open views and relatively little woodland. Arrays, fencing and substations on this scale would transform the openness and legibility of the vale landscape for at least four decades. EN-3 requires applicants to minimise landscape and visual impacts and to assess cumulative effects with other schemes; local plan policies require protection and enhancement of landscape character. | **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** considers the landscape and visual impacts of the Proposed Development with reference to relevant landscape character assessments and significant effects. A range of factors have been considered including visibility, views, visual amenity, light pollution, local amenity, tranquillity and nature conservation.<br><br>Section 6.3 of the **Planning Statement [APP-182]** sets out an assessment of potential cumulative effects has been undertaken. This concluded no significant cumulative effects would arise for landscape and visual impacts. Furthermore, despite the fact introduction of new energy generation infrastructure into the landscape will inevitably result in some visual effects, the Proposed Development has been designed to minimise visual effects as far as possible.<br><br>Embedded mitigation measures and the implementation of best practice measures in accordance are provided in **ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089]**, **ES Appendix 4.4 outline Operational** |

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| | | | **Environmental Management Plan (oOEMP) [APP-092], ES Appendix 4.3 outline Decommissioning Plan (oDP) [APP-090]** and **ES Appendix 7.14 outline Landscape Ecological Management Plan (oLEMP) [APP-116].**<br><br>Detailed versions of each plan are secured via **dDCO [APP-041]** requirements 6 (LEMP), 7 (CEMP), 9 (OEMP) and 21 (Decommissioning and Restoration).<br><br>Construction, operation (including maintenance) and decommissioning phases of the Proposed Development are not anticipated to result in any significant adverse effects on landscape and visual receptors. Benefits of the Proposed Development outweigh less than significant impacts that have been minimised and mitigated. |
| RR-035/27 | Socio Economic impacts for farmers | A number of local farms (twelve named by RES) will be directly affected by this development. Of those named farms, seven will be highly impacted, with reductions in land area ranging from 39% to 71%. At least four of the farms would no longer be viable, as opposed to RES' claim they will be. One Farm is currently a self-sustaining beef production unit that could no longer function as such. The others would need to operate on a reduced basis.<br>The grain production from arable farms would require import substitution, and the additional environmental costs involved would be significant. It must also be remembered that the | **ES Chapter 15 – Land Use and Agriculture [APP-072B]** addresses matters related to agricultural viability.<br><br>Requirement 22 of the **dDCO [APP-041]** secures a skills, supply chain and employment plan that is required to be submitted and agreed with the local planning authority before any phase of the Proposed Development commences. |

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| | | subcontractors, equipment suppliers and other local businesses that rely on these farms would also be adversely impacted.<br>By RES' own conclusion, the Proposed Development will not bring any long-term full-time equivalent employment to the area (6.3.10 Appendix 10.1 Outline Supply Chain, Employment and Skills Plan Paragraph 4.4) and no long-term economic benefit to the community is detailed. | |
| RR-035/28 | Bassetlaw Local Plan | 9. The adopted Bassetlaw Local Plan (29 May 2024) provides a positive but conditional policy framework for renewables (Policy ST49), alongside landscape (ST35), biodiversity/BNG (ST38), flood risk (ST50), design quality (ST33) and heritage (ST40/41). Bassetlaw District Council's Local Impact material highlights concerns over cumulative adverse impacts from multiple NSIPs and BESS proposals in and around the Trent corridor Bassetlaw Local Plan 2020–2038 adopted 29 May 2024 (https://www.bassetlaw.gov.uk/media/gn1kjm1b/adopted-bassetlawlocal-plan-2020-2038.pdf) policies ST33, ST35, ST38, ST40/41 (pages 112 to 131), ST49 (pages 142) , ST50 (pages164); BDC Local Impact material on cumulative effects). This proposal must be tested rigorously against these policies, including explicit consideration of BMV, hydrology, landscape and cumulative effects. | Section 6 of the **Planning Statement [APP-182]** provides an appraisal of the Proposed Development demonstrating compliance with relevant policy requirements of NPS EN-1, NPS EN-3 and NPS EN-5 that, as set out in Section 4 and Section 5 of the **Planning Statement [APP-182]**, establishing the need for solar energy generation.<br><br>Section 104, Planning Act 2008 states that the Secretary of State must decide the application in accordance with any relevant national policy statement. The NPS should therefore be given significant weight.<br><br>An assessment of the Proposed Development against the provisions of the NPSs is provided at Appendix C and accordance with the relevant Local Plan set out at Appendix D to the **Planning Statement [APP-182]**.<br><br>Bassetlaw Local Plan policies referred to by FFF (ST33, ST35, ST38, ST40, ST41, ST49 and ST50) have all be considered. Appendix D to the **Planning Statement [APP-182]** sets out how |

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| | | | the Proposed Development complies with these policies either in full or parts of these policies that are relevant to the Proposed Development. |
| RR-035/29 | Traffic and Transport | The construction phase will involve heavy vehicle movements, prompting concerns about the suitability of local roads and potential impacts on safety and local transport infrastructure especially in combination with the simultaneous construction of other industrial-scale projects referenced in Section 2 above. In particular, the Applicant does not appear to have given any consideration to the impacts of construction on road safety and traffic in Sturton le Steeple and the surrounding area of multiple development projects under construction over the same time period.<br><br>The volume and frequency of construction traffic on narrow rural roads pose safety risks and threaten to degrade local infrastructure. These roads are not suited for sustained HGV access over extended periods (temporal effects of the cumulative impact). During the construction phase and beyond, it is highly likely that walkers and riders will be translocated to the roadways because of project(s) impact on public rights of way and bridleways, many of the roads and lanes are narrow and many have no footpaths.<br><br>There is no certainty on the timing of the various projects, over-runs, delays, amendments etc. This has been recognised in the RES Steeples traffic documentation P22-1122-TR-TA, but there is | Vehicle routing for deliveries and workforce trips are proposed to be routed to and from the north of the site. This restricted routing is identified in ES Appendix 13.2 outline **Construction Traffic Management Plan (oCTMP) [APP-129]** and will be secured by requirement 8 of the **dDCO [APP-041]** through delivery of the CTMP which must be approved by the local planning authority prior to commencement of the relevant phase of the authorised development and must be in accordance with the oCTMP. Therefore, traffic will not be routing through Sturton-le-Steeple.<br><br>Consideration has been given to the cumulative impact in highway terms in **ES Appendix 13.1 Transport Assessment [APP-128].** Programmes and timings of committed development schemes construction periods would be considered in the future when these are known in relation to the Proposed Development's timescales. The relevant Committed Development sites are identified and summarised in **ES Appendix 13.1 Transport Assessment [APP-128]** Chapter 7 Table 7.1 The traffic flow diagrams associated with the daily flows for each of the identified committed development sites are provided in Appendix G of **ES Appendix 13.1 Transport Assessment [APP-128]**. |

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| | | no detail on the worst-case scenario and no mitigation suggested for such an occurrence. | The **oCTMP [APP-129]** includes a package of mitigation measures summarised in Chapter 6 of the **oCTMP [APP-129].** These commit the applicant to:<br>• Ongoing monitoring and enforcement of the approved arrangements to ensure adherence to designated routes and site management protocols;<br>• Measures to manage and coordinate construction traffic to minimise impact on local highways and residents; and<br>• Measures to ensure safety and operational efficiency of the construction route.<br><br>It is therefore considered that the cumulative impact of the committed schemes in the vicinity of the site can be managed in accordance with these overarching commitments in the **oCTMP [APP-129]** and commits to managing construction traffic safely.<br><br>With reference to the comments relating to the Public Right of Way (PRoW) use, due to the existing level of usage recorded on the PRoWs and levels of construction traffic within the site using the haul routes, it is not considered necessary at this stage to provide alternative or diverted/closures of PRoW routes during construction. PRoW routes will be managed through a combination of mitigation measures such as appropriate signage, fencing, banksmen, crossings etc. Further information is provided in Chapter 7 of the **oCTMP [APP-129]**. |

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| | | | The Applicant has confirmed that the Proposed Development has the relevant Rights to use the PRoWs, including Byways, from the landowner. |
| RR-035/30 | Traffic and Transport | The combined projects rely on heavy machinery and much increased heavy goods vehicle movements which have and will continue to put undue strain on the local rural road network and further degradation of the road surfaces which are not designed for such volumes of traffic or HGV vehicles and certainly not for such industrial use. This will also significantly increase risks to residents, school traffic and cyclists who use the rural road network and pathways. Sturton le Steeple is defined as a linear village with one single through road (Class c or 3) with several small, narrow trunk roads/lanes (unclassified or Byways).<br>This and other projects all plan to use the A631, A620 then Gainsborough Road and in this case, Wheatley Road for their main HGV movements. Any incident or temporary closure of these roads render the area 'closed' and result in long detours of approximately 18 miles each way and putting undue pressure on the village of North Leverton and Wheatley. The Gainsborough Road / Station Road Junction is already an area where there have been several near miss incidents. The Village and school bus stop is on the junction and visibility towards Wheatley is limited and vehicles often fail to give-way to traffic coming from Wheatley.<br>This and other projects intend to create new crossings over the unclassified (adopted roads) and create trackways to transport equipment and lay cables in the area. Whilst this is commendable for removing traffic movements within the rest of | The Applicant notes this comment that is relating to the degradation of road surfaces. Mitigation has been provided in Chapter 6 the **ES Appendix 13.2 oCTMP [APP-129]**. which includes undertaking a Condition Surveys pre- and post-construction. The Condition Surveys will ensure that any potential degradation resulting from construction activities is identified and appropriately rectified. The Public Right of Ways (PRoWs) will have a low level of traffic to manage alongside the non-motorised users, and therefore mitigation suitable for the level of usage is proposed in the **ES Appendix 13.2 oCTMP [APP-129]**. (e.g. fencing, signage etc).<br><br>Further information will also be provided in the TA/CTMP/Addendums as part of the Examination process as surveys of the PRoW within the site have been undertaken and analysed, with appropriate mitigation proposed based on the counts recorded.<br><br>With regards to the impact of deliveries at school drop off/pick up times, Requirement 8 of the **dDCO [APP-041]** secures a CTMP. The CTMP requires the submission and agreement of various details with the relevant local authorities that includes traffic movements from deliveries and staff/construction and traffic management requirements on the adjoining public highway. |

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| | | the village it will results in every arterial road/lane being affected by the creation (specifically to RSE Project) of new crossings and field access tracks around the entire circumference of the village. | A restricted routing to/from the north of the site (based on the agreed routing for the power station) is proposed in the oCTMP and will be secured through Requirement 8 of the **dDCO [APP-041]**. This will minimise traffic on the surrounding local roads and villages. A Workforce Travel Plan (outlined in **ES Appendix 13.2 oCTMP [APP-129]**.) outlines measures for minimising the number of single occupancy vehicle trips to the site. Shift times will also be staggered where possible to avoid peak network hours.<br><br>The management and programme of the committed schemes in the vicinity of the site to minimise the potential impact, can be undertaken by the Applicant, in consultation with the local highway authority.<br><br>The recorded Personal Injury Accident data for the local highway network has been considered in **ES Appendix 13.1 Transport Assessment [APP-128]**. The data analysis concluded that there is no existing highway safety problem.<br><br>A PRoW management plan is provided within **ES Appendix 13.2 oCTMP [APP-129]**. It concludes that the low level of construction traffic using tracks and crossings within the site would not have a severe impact on the PRoWs. Further information on the PRoW existing users is provided in the **ES Appendix 13.1 Transport Assessment [APP-128]** and a TA Addendum written after the |

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| | | | DCO submission (which includes PRoW user survey data). Internal trips within the site are proposed to be undertaken by tractor and trailer vehicles, and these types of vehicles are already using the local network.<br>The TA and oCTMP Addendums provide additional information on vehicle and PRoW users based on the surveys undertaken following DCO submission. The data analysis concludes that the development construction traffic is not considered to have a significant impact when suitable mitigation is implemented based on the criteria set out in the **ES Chapter 13: Transport & Access [APP-071]**. |
| RR-035/31 | Traffic and Transport | There is an active railway line (previously used by West Burton Coal Fired Power Station prior to its recent decommissioning) that runs through the middle of the proposed project area, yet no consideration has been given to using this for deliveries rather than HGVs. | During pre-application discussions with Nottinghamshire County Council Highways, the scoping note submitted by the Applicant identified the location of the railway which remains at the West Burton Power Station and that there is no passenger rail link.<br><br>It was considered, at this stage, that it would be unlikely that equipment required for the proposed solar farm would be located where there are operational rail links and would therefore require loading onto road transport to transfer between rail sites, which is not feasible. Rail was therefore scoped out of the Environmental Statement and to date, Nottinghamshire County Council Highways have not required the Applicant to consider this further.<br><br>Nevertheless, Appendix D of the **Planning Statement [APP-182]** sets out the potential use of water-borne and rail transport |

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| | | | instead of road transport for all phases of the Proposed Development has been considered. Whilst use of both alternative is possible in the supply of the Proposed Development, the final leg of deliveries during construction will be undertaken by roads set out in the study area. For example, larger equipment, such as transformers or batteries, will be transported to the Humber docks by sea (Hull, Immingham, Goole) but the final delivery will be via the strategic and local highway network as set out in **ES Appendix 13.2 oCTMP [APP-129]**. |
| RR-035/32 | Traffic and Transport | Each project that has been passed has made assurances to the local community that their activities will not adversely impact our daily lives, and to date they have failed to comply with those re-assurances and permission constraints. There have been a number of breaches recorded and minute over the recent years. In addition, the village has a history of monitoring speed as it has also been problematic. The reality is that it is the community that is expected to monitor these activities not the planning or permitting authorities with the emphasis being on the public 'alleging' breaches and having to prove them rather than the developer or their supply chain complying with requirements in the first place. | **ES Appendix 13.2 oCTMP [APP-129]**. provides a package of measures which will mitigate the impacts of the development. This will be monitored and managed as appropriate to ensure impacts are minimal.<br><br>Furthermore, **ES Appendix 13.2 oCTMP [APP-129]** indicates at paragraph 6.15 that:<br><br>"*A structured disciplinary procedure will be enforced to ensure strict adherence to agreed routing and site management arrangements. Any vehicle operators found to be in breach of the approved protocols will face progressive penalties, ranging from formal warnings to suspension of site access rights, depending on the severity and recurrence of non-compliance*".<br><br>**ES Appendix 13.2 oCTMP [APP-129]**. will be secured through requirement 8 of the **dDCO [APP-041]**. |

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| RR-035/33 | Landscape and Visual | The parish of Sturton le Steeple covers an area of approximately 6.71 square miles and is made up of includes the villages of Sturton le Steeple and Fenton, and the hamlet of Littleborough. The parish also encompasses the abandoned medieval village of West Burton. This project is estimated to take up 50% of the parish alone and, along with the other major proposed and existing industrial projects (namely the Quarry, STEP Fusion and the Grid Upgrade), that proportion of previously rural and farmland being given over to industrial use rises to 90%.<br>A project this scale inevitably impacts the visual landscape, particularly in this rural area, and represents clear over industrialisation of the countryside given the size of its footprint. The size of the solar array and its infrastructure will alter the visual landscape of the area. A project of this scale will significantly alter the character of the local countryside and the visual amenity for residents and visitors. | A Landscape and Visual Impact Assessment (LVIA) was included as part of **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]**. The LVIA considered the potential for impacts on landscape character and visual amenity and identified some localised significant effects. Landscape Mitigation proposals are set out in the LVIA and **ES Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160]** that serve to reduce the effects, particularly once proposed planting has begun to mature. |
| RR-035/34 | Landscape and Visual | The proposed development would cause significant visual harm to the open countryside, affecting public rights of way, the rural character of the area, as well as residents' and visitors' views. The scale and extent of the scheme are incompatible with the landscape, with inappropriate screening and mitigation. Every single road, public right of way and bridleway accessible from Sturton le Steeple will be affected by this project. Evidence from the global pandemic clearly shows that loss of access to open space is not beneficial to mental health and well-being. The vast scale of the proposed Steeple Renewables Project, encompassing large areas of open fields with extensive arrays of | The LVIA included in **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** identifies some localised significant effects to landscape character and visual amenity. Not all roads, public rights of ways and bridleways in the vicinity of Sturton-le-Steeple would have visibility of the Proposed Development, in part due to the network of existing hedgerows and vegetation which serve to limit views towards the Site. |

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| | | solar panels and associated infrastructure, will result in a significant and negative transformation of the landscape character and views and leave local people with no direct unaffected access to open countryside. | |
| RR-035/35 | Landscape and Visual | The installation of circa 850,000 solar panels at a height of 3 meters, and the associated infrastructure to a maximum height of 12m and associated security fencing at 3m will significantly impact views from residential properties, public footpaths, and roads within and surrounding the development site. The applicant's only mitigation appears to be hedgerow planting which will not allay concerns raised and will result on further loss of amenity. Residents and visitors, including those who walk regularly, will no longer be able to enjoy the existing countryside views and will instead be confronted by vast expanses of reflective solar panels. Footpaths and lanes will become akin to walking through a maze or within a prison compound as described by residents. The visual impact will be particularly noticeable from elevated positions around the villages of North Leverton, Wheatley and Sturton across the valley towards North Leverton Windmill, Littleborough and the historic skyline of Lincoln.<br>The introduction of such a large-scale industrial facility into a predominantly rural area will inevitably degrade the sense of pride and place and the amenity value of the surrounding communities. The character and quality of the local area will be diminished, affecting the quality of life for those who reside in or visit the area. | The LVIA included in **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** identifies some localised significant effects to landscape character and visual amenity. The mitigation has been carefully considered and included the provision of offsets from receptors during the design process, as well as proposed new planting, which includes areas of woodland and trees as well as hedgerows and species rich grassland. |

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| RR-035/36 | Landscape and Visual | While the project includes a Landscape and Visual Impact Assessment (LVIA): EN010163/APP/6.2.6, community concerns remain regarding its thoroughness and the conclusions reached. It is essential for LVIAs to clearly distinguish between significant and non-significant effects, and a proper assessment should go beyond simply acknowledging change using computer modelling, including visits to the locations to see first-hand the impacts. Mitigation measures, such as screening and buffering, will not be sufficient to address the scale of the visual intrusion in the long term, and their effectiveness is questionable.<br>This project should be assessed in conjunction with other existing or proposed developments in the area (as reference in Section 2 above) to understand the potential cumulative impacts on the landscape and local amenity. | The LVIA included in **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** clearly distinguish between significant and non-significant effects, and its assessment were informed by detailed site work, in addition to desk-based analysis and supporting Zone of Theoretical Visibility mapping. The proposed landscape mitigation has been carefully considered and included the provision of offsets from receptors during the design process, as well as proposed new planting. The LVIA did include a cumulative impact assessment. |
| RR-035/37 | Cultural Heritage | The proposed development risks negatively affecting the setting of heritage assets, heritage landscapes and sites of archaeological interest. Visual intrusion and land disturbance will undermine the historic character of the area. Our cultural heritage is at the heart of this community and contributes indirectly to the emerging tourism and underlying local economy.<br>The area boasts a rich cultural history due to its connection with the Pilgrim Fathers, St Peter & St Paul's Church, the church of St Nicolas at Littleborough, Roman and medieval settlements, and other non-designated heritage assets. The presence of 33 listed buildings locally, many of them directly adjacent to the proposed development shows the important historical and cultural | The Applicant has undertaken a thorough assessment of identified heritage assets designated and non-designated heritage, within the Study area. The results of the assessment are discussed within the **ES Chapter 9: Cultural Heritage [APP-067]**, and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122].** It is acknowledged within ES Chapter 9 that the Proposed Development would result in some harm to some heritage assets. It is the Applicant's position that the need for the Proposed Development demonstrated within the NPS EN-1 and EN-3, outweighs the harm observed to heritage assets.<br><br>The specific heritage assets mentioned, comprising Church of St Peter & St Paul , the Church of St Nicholas, and the Scheduled |

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| | | heritage. This was reflected in the Neighbourhood Plan for Sturton le Steeple,1 adopted in 2015, policies 6/3 and 6/14, where "Planning Permission will not be granted for development that will have a significant detrimental effect upon the appearance and amenity of the countryside. it would not cause demonstrable harm to any interests of acknowledged importance; and where development is considered appropriate it is so designed and located as not to adversely affect the character and appearance of the surrounding area."<br>The historic character and setting of several of these listed buildings would be negatively impacted by covering the surrounding fields with solar panels, especially the North Leverton Windmill (Heritage Asset of National Importance and Grade II*), and West Burton Village (Scheduled Monument), Tollbar Cottage, Habblesthorpe Manor and Corner Farm pump and buildings. The same is true of the churches, including the Norman/Saxon church of St Nicholas in Littleborough, St Martin in North Leverton, and St Peter & St Paul in Sturton le Steeple.<br>The negative visual impact of vast arrays of solar panels, battery storage containers and CCTV monitored security fencing would be to the detriment these assets and their connection to the historic landscape. It would also be contrary to guidance (HoC Library Debate Pack 18 July 2023 Planning and Solar Farms) that emphasizes safeguarding important environmental features in the setting of heritage assets. | Roman and medieval settlements have all been identified within the supporting heritage documentation and were subject to detailed assessment in both the **ES Chapter 9: Cultural Heritage [APP-067]**, and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. The assessment concluded that the Operation of the Proposed Development would have the following temporary, indirect effects on the identified assets:<br>• Church of St Peter & St Paul – Moderate adverse, not significant;<br>• Church of St Nicholas – Neutral, not significant;<br>• Segelocum Roman town Scheduled Monument – Minor adverse, not significant; and,<br>• Medieval settlement and open field system immediately south east of Low Farm Scheduled Monument – Minor adverse, not significant.<br><br>With regard to the referenced quote, this does not appear to relate to Policy 6 of the Neighbourhood Plan (Protecting the historic environment), instead relating to amenity of the countryside and the character of the area. This is not considered to be a heritage matter or related to the assessment of harm to the significance of heritage assets.<br>The Applicant has considered potential impacts to the significance of assets in the vicinity of the Proposed Development, through changes to setting, in detail in the **ES Chapter 9: Cultural Heritage [APP-067]**, and **Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. It is |

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| | | | acknowledged that there will be some residual effects to certain assets. It is not correct to say that the simple fact of a solar scheme in proximity to heritage assets would be harmful – this is not an approach advocated the by the guidance of Historic England's Historic Environment Good Practice Advice in Planning: 3 (GPA3) The Setting of Heritage Assets (2nd Edition, December 2017). The heritage documentation supporting the application has set out the assessment process clearly and undertaken the staged approach, as advocated by Historic England with regards to establishing what the setting of assets is and then establishing whether the Proposed Development would cause harm, and if so, what level. With regard to the named assets of Habblesthorpe Manor and Corner Farm pump and buildings, these were not taken forward for further assessment, as no harm to their significance was anticipated from the Proposed Development. These assets are however considered in Appendix 1 of **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-129]**. The remaining assets are discussed in detail in **ES Chapter 9: Cultural Heritage [APP-067]**, and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-129]**, which conclude that no significant effects were observed. This is set out in Section 9.7, Section 9.9, Section 9.11 and Table 9.5 of **ES Chapter 9: Cultural Heritage [APP-067].**<br><br>The **ES Chapter 9: Cultural Heritage [APP-067]**, and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**, have considered the heritage assets within the vicinity of |

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| | | | the proposed Development and identified what elements of their surroundings contribute to their significance. As above, it is acknowledged that there will be some residual effects/less than substantial harm to identified assets and this harm must be weighed in the planning balance – taking into account the temporary nature of the Proposed Development and the reversibility of identified harms.<br><br>The Applicant has reviewed HoC Library Debate Pack 18 July 2023 Planning and Solar Farms. Sections 2.2 and 3.2 of the document relate to existing policies and proposed reforms to policy concerning Large-scale solar farms (above 50MW). However, there are no specific references to heritage assets within these sections, with only direction and reference to National Policy Statements (NPSs). These policies have been reviewed and considered within the **ES Chapter 9: Cultural Heritage [APP-067]**, and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122].** |
| RR-035/38 | Cultural Heritage | Construction activities such as excavations for cable routes, foundations for substations, and mounting structures, despite claims of minimal impact, have the potential to disturb and damage buried archaeological remains. The irreplaceable loss of such remains, once destroyed, cannot be adequately mitigated by subsequent recording or analysis. The sensitivity of the area, including the proximity to the deserted medieval village and Littleborough, demands a precautionary approach and a more robust strategy for the protection of archaeological heritage. | It is acknowledged in the **ES Chapter 9: Cultural Heritage [APP-067]**, that construction activities have potential to physically impact upon archaeological remains. The areas of greatest archaeological potential have been removed from the Proposed Development. A programme of pre-determination trial trenching has been undertaken, focussed on 'fixed' areas of large-scale development (**ES Appendix 9.4 – Outline Written Scheme of Investigation for Pre-Determination Trial Trenching [APP-** |

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| | | These heritage assets and landscapes are connected via a series of scenic roadways, bridleways and footpaths including the Trent Valley Way, the Pilgrims Way and Mayflower trail. Each and every road, bridleway and footpath connecting these heritage assets and views will be impacted by this project. | **125]**) and focussed on those areas of development which would have the greatest level of impact upon archaeological deposits.<br><br>The approach to additional, post-consent works is set out in **ES Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**).<br>The Trent Valley Way, Pilgrims Way, and Mayflower trail are all modern tourist routes, having been created in 1998, 2020, and 2007 respectively. These are not heritage assets so are not considered to be of relevance when considering specific assets and their significance. Views to and from these pathways are matters of amenity unless they make a specific contribution to the significance of heritage assets. This approach is in accordance with Where relevant to specific assets, certain routes, footpaths etc. and their relationship tto assetshave been considered within the ES Chapter 9: Cultural Heritage **[APP-067]**, and **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. |
| RR-035/39 | Cultural Heritage | While a scoping report and preliminary environmental information report have been produced, concerns have been raised about the adequacy of the assessment given the lack of reference to local knowledge and information. A more comprehensive and targeted evaluation should be undertaken prior to any decision, focusing on areas with high archaeological potential and those heritage assets most impacted by the development and take account of the potential and irreversible damage as outlined by the Bassetlaw Local Plan and endorsed by | No specific local knowledge or information is referenced which contradicts or provides any further detail with which to assess unidentified assets or re-assess assets already considered. With regard to archaeology, the results of fieldwork undertaken by local groups has been taken into account, e.g. in relation to survey works seeking to identify the Roman Road, referenced in **ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122]**. With regard to the suggestion for a more comprehensive, and targeted evaluation, focussed on areas of high |

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| | | several historical and other bodies including Nottinghamshire County Archaeology, Historic England, York Archaeology Trust (formerly Trent and Peak), The Society of Environmental Authors and Journalists and more locally, currently working in Littleborough, The Retford Archaeological and Metal Detecting Group . | archaeological potential and those heritage assets most impacted by the development, it is noted that the areas of greatest archaeological potential have been excluded from development, and a programme of pre-determination, focussed on the 'fixed', large-scale elements of development is proposed (**ES Appendix 9.4 – Outline Written Scheme of Investigation for Pre-Determination Trial Trenching [APP-125]**). Further works and mitigation are outlined in the **ES Appendix 9.5 - Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**. |
| RR-035/40 | Noise and Vibration | Noise and vibration will impact on nearby residents' amenity, and the recreational amenity of all residents and visitors using the footpaths and other public rights of way on or nearby a solar array site. This disturbance will significantly impact local wildlife by disrupting communication, navigation, and foraging behaviours, leading to increased stress, altered habitat use, and reduced reproductive success. Animals rely on sound for crucial life functions, and human generated noise interferes with these processes, ultimately affecting their survival and the overall health of ecosystems. All life, be it human or animal, in the near proximity of our village will be subject to many decades of this disturbance and acoustic pollution.<br>Residents are aware that a perceived advantage of solar facilities is that they are silent and only operate during the day. However, facilities with battery energy storage systems (BESS) do result in transformer and inverter operation during the night. There is a real need for acoustic evaluation and noise control with respect | Chapter 6.7 of the **Planning Statement [APP-182]** sets out **ES Chapter 11: Noise [APP-069]** has assessed noise and vibration impacts of the Proposed Development through a combination of consultation, background noise survey and computer modelling.<br><br>The noise assessments consider operational noise as well as noise and vibration from construction activities and construction traffic on noise sensitive receptors ('NSR').<br>Background noise monitoring was carried out at a large number of locations representing nearest sensitive existing receptors surrounding potential development areas.<br><br>Noise emissions from plant within the Proposed Development including solar PV arrays, energy storage and electrical substations have been predicted at the nearest NSRs.<br>The local planning authority has been consulted on and agreed to the appropriateness of methodology adopted to assess |

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| | | to night-time operations of solar energy components, but equipment manufacturers are extremely reluctant to release data on the acoustic output of the equipment they supply. While quiet transformers and inverters are available, due to their premium cost, they are generally not a specification point the solar facility designers are willing to consider. Solar energy facilities can be designed to be inaudible, but this is generally achieved only after site evaluation and planning. Another aspect that has not been addressed is the problem of wind noise/resonance from the construction of large panel structures. Our concerns can be summed up in a recent Planning Inspectorate decision that recognised the noise issue of solar farms. Dismissing an appeal against refusal of planning permission for a solar array of 185 acres at Alfreton in Derbyshire in December 2022, the Inspector referred in his decision letter to the impacts of "a dominant industrial installation with associated noise from inverters" and the "significant and detrimental change in the character and appearance of the area" which would result from the solar installation. said the Inspector concluded: "I consider that 40 years is a very significant period in people's lives during which the development would seriously detract from landscape character and visual amenity'"(Appeal Ref: APP/M1005/W/22/3299953, Land north west of Hall Farm, Church Street, Alfreton DE55 7AH). | operational noise; a reflection of industry best practice in such circumstances where existing background levels surrounding a development are low.<br><br>In such instances BS 4142 contains a clause that alternative guidance WHO/BS 8233 and IEMA guidance should be considered and used to inform the assessment.<br>When assessed against the criteria, noise emissions during operation do not result in a significant impact at any NSR and no further mitigation measures are required.<br><br>Likely change in noise levels due to the contribution of noise emissions from the Proposed Development at each NSR during operation has been considered via a further assessment. When the predicted noise contribution from the Proposed Development is combined with existing noise climate at each receptor, the change in noise level is insignificant and no mitigation measures are required.<br><br>Construction and decommissioning sound and vibration from the introduction and removal of the Proposed Development could be significant in the absence of standard mitigation measures which would incorporate the adoption of a CEMP and the use of 'best practicable means' ('BPM') to reduce and mitigate construction sound and vibration levels as far as reasonably possible. However, provided that the appropriate mitigation measures are adopted as a matter of due course and that particular attention is |

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| | | | paid to potentially sensitive locations, levels are unlikely to exceed typical limiting criteria at nearby properties at which point sound and vibrations could be heard. This aspect is therefore considered to consequently have a low overall impact, with the corresponding significance of effect being moderate/minor. Therefore, construction and decommissioning impacts are also not considered significant.<br>BMP to minimise noise during construction and decommissioning are included within **ES Appendix 4.1 oCEMP [APP-089]** and **ES Appendix 4.2 oDP [APP-090]**. No mitigation beyond implementation of construction and decommission BPM is required.<br><br>Requirement 7 (CEMP) and 21 (Decommissioning and Restoration Plan) of the **dDCO [APP-041]** secure additional details of each plan.<br><br>The **Statutory Nuisance Statement [APP-179]** considers whether, amongst other matters, noise and vibration impacts will give rise to a statutory nuisance. That statement concludes the Proposed Development is not likely to give rise to a statutory noise or vibration nuisance, or any other statutory nuisance.<br><br>Finally, the Applicant notes that the appeal decision reference APP/M1005/W/22/3299953 was for a much smaller solar development amounting to 49.9 MW that could power between 11500 and 13360 homes annually. The local authority had |

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| | | | refused planning permission on grounds of landscape quality, character and appearance of the area as well as a detrimental impact to the setting and harm to identified heritage assets (noise was not a reason for refusal).<br><br>Whilst the Inspector noted potential harm with regards noise the appeal was dismissed for other reasons. The Inspector is clear he did not determine if potential harm regarding noise impact to children at a Special School, who were some of the most vulnerable in society with complex audio-sensory processing difficulties perhaps with a hypersensitivity to noise, who may be disturbed by unusual tonal elements or unexpected sounds, and that can be very difficult to manage, could be mitigated sufficiently both in school grounds, and when walking on local paths.<br><br>There was also no evidence to contradict the experience of school staff that some pupils had enhanced audio-sensory capabilities and susceptibility to sounds which most people cannot hear with regards noise.<br><br>It is clear the cited appeal was a unique situation bearing in mind the special school adjoining the appeal site. This is not the case and is not directly comparable with the Proposed Development.<br><br>It must also be noted that the cited appeal decision was determined nearly three years ago in December 2022, it was not |

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| | | | assessed against current National Policy Statements (dated November 2023) and did not form Critical National Priority 'CNP' infrastructure. Furthermore, the Proposed Development involves a much larger renewable energy development (600MW) that would power 180,000 homes annual (roughly half of Nottinghamshire). It is also located within and close proximity to West Burton Power Station (not a Special School).<br><br>Finally, the Applicant notes the recently determined (June 2025) West Burton DCO (EN010132) as made by the Secretary of State is for a temporary period of 60 years, 20 more than the period requested by the Steeple DCO. |
| RR-035/41 | Light Pollution and Ecology | Whilst there may little empirical evidence of light pollution from solar panels, the amenity of neighbouring property can be seriously harmed by secured boundaries and intrusive CCTV. Research (Assessing the Impact of Solar Farms on Waterbirds: A literature review of Ecological Interaction and Habitat Alterations, C. M. Anderson, A. P. Hopkins & J. T. Anderson, Clemson University, Georgetown, SC 29442, USA) has also found large-scale solar farms impact migratory routes of wildlife due to polarised light pollution and that the vast, flat surfaces of solar farms mimic the appearance of water bodies, confusing migrating birds and leading them off course from their natural migrations. Polarised light pollution can also attract insects, inadvertently creating new feeding grounds for birds thus compounding the issue for some species. | Section 3 and Appendix C of the **Planning Statement [APP-182]** confirms 3.5m high pole mounted internal facing closed circuit television (CCTV) systems for security purposes are proposed around the perimeter of the operational areas of the Solar PV Site. These will not require lighting and will use infrared technology at night. CCTV details are provided in **Typical Security CCTV Detail Plan [APP-025]**. Amenity of local residents will not be compromised.<br><br>With regards external light, during both construction and decommissioning, activities can take place during daylight hours. However, at certain times of the year when light levels are low temporary external lighting will be deployed. Temporary external lighting will be avoided as far as practical and generally limited to the compound areas. External lighting of the on-site substation |

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| | | | and BESS will be required during operation in accordance with Health and Safety requirements, particularly around any emergency exists.<br>The implications of the lighting strategy, set out in **ES Chapter 4: Proposed Development [app-062],** are considered in Table 6.1 of **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]**. This confirms that there would be no lighting associated with the solar energy element of the Proposed Development during the operational phase of the development and for the substation and BESS, movement activated security lighting will be provided, with no permanent lighting required to be switched on. During the construction and decommissioning period there will be limited working outside of daylight hours and where any such works were to take place standard best practice will be implemented to minimise light spill and any potential for effects of lighting on human receptors such that no significant effects would arise.<br>Consideration of lighting impacts and mitigation is for various features such as bats and barn owls is set out in **ES Chapter 7: Ecology and Biodiversity [APP-065]**.<br><br>Control of lighting is set out in **ES Appendix 4.1 - oCEMP [APP-89], ES Appendix 4.4 oOEMP [APP-092]** and **ES Appendix 4.2 oDP [APP-090]**. |

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| | | | Requirement 7 (CEMP), 9 (OEMP), and 21 (Decommissioning and Restoration) of the **dDCO [APP-041]** secures additional details of each plan. |
| RR-035/42 | Dust - Soil | Solar arrays do not cause dust pollution, however the soil around the village is only inches deep and sits on a thick layer of clay. This summer is one of the hottest on record and is expected to increase yearly. There is widespread evidence of the underlying clay drying much faster than usual resulting in the deformation of stone garden paths, cracking in brick walls and the shrinkage of soil around structures. The soil beneath solar arrays will continue to shrink due to a combination of rapidly drying soil in periods of no rain and high heat. | The Applicant notes this comment. **ES Appendix 15.2 outline Soil Management Plan (oSMP) [APP-132]** sets out how soils within the Order Limits will be managed through all phases of development and appropriate mitigation measures provided including to minimise the impact of dry and wet conditions. Requirement 11 of the **dDCO [APP-041]** secures the submission of Soil Management Plan (building on details in the oSMP) to and approved by the relevant host local authority before any phase of development commences. |
| RR-035/43 | Microclimate - Soil | The village is located in the Trent Valley and has its own microclimate as residents on its southern perimeter can attest, especially to the strength of the wind from the south. The combination of wind and 40 years of soil drying out under solar panels, plus ever-increasing air temperatures will lead to substantial erosion of the high quality land around our village. | |

## Table 2-28: West Burton Solar Project

| ID | Theme | Verbatim Comment | Response |
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| RR-044/1 | Safety offset between the BESS and the WB Grid Connection Cable | WBSP has reviewed the Works Plans **[APP-007]** and has identified that the proposed location for the BESS is above and adjacent to the WB Cable Corridor. Work No. 2 is the battery energy storage system compound, and the BESS may be located anywhere within the area shown in yellow as Work Order 2 on sheet 3 of the Works Plans.<br>The BESS Layout Detail Plan **[APP-031]** provides an indicative layout for the BESS, showing that batteries are proposed to be located immediately north of the WB Cable Corridor.<br>The BESS Layout Detail Plan shows that an offset of 75 metres has been applied between the existing 400kV overhead lines leading into the West Burton substation. However, the proposals do not appear to have appropriately considered a suitable offset from the WB 400kV grid connection cable. The BESS layout appears to have been designed to be no closer than approximately 49m from the *centreline* of the WB cable corridor (Figure 1); however, the WB grid connection cable may be located anywhere within the WB Cable Corridor.<br>The WB Cable Corridor will contain Work No. 5A, as defined in the WB Order. This is the 400kV grid connection cable, enabling the export of electricity generated by the WB Project to the National Grid, as well as the import of electricity for storage in the WB Project's BESS to provide grid balancing services. The 400kV cable may be located anywhere within the WB Cable Corridor.<br>The 50m wide cable corridor is included in the WB Order to allow | The Applicant notes West Burton's comments and can confirm that it has been in detailed discussions with West Burton about safety offsets. It is currently negotiating a side agreement which it expects to be completed prior to the close of examination |

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| | | for micrositing of the cable as necessary due to ground conditions and other engineering constraints. At this time, it is not possible to confirm the exact location within the WB Cable Corridor for the 400kV grid connection cable.<br>WBSP is concerned that sufficient offset must be maintained between the proposed BESS and the WB Project's 400kV grid connection cable. The cable will be located below ground and therefore the offset may be smaller than the offset to the overhead lines. For safety reasons, no battery or power conversion system (PCS) must be located within **23 metres** (75 feet) of the WB Project's 400kV grid connection cable. This is to ensure that, in the event of a fire or explosion at the BESS, the WB Project's 400kV grid connection cable will not be damaged or severed.<br>As the exact location of the WB Project's 400kV grid connection cable is not yet known, the 23 metre offset should be measured from the edge of the WB Order Limits in order to ensure the BESS is located in a safe position.<br><br>WBSP therefore requires that the protective provisions are amended to include a prohibition of batteries and PCS within 23 metres of the WB Project Order Limits, until such time as Work No. 5A has been constructed. Following the construction of Work No. 5A, the prohibition must be 23 metres from the location of the installed cable. | |

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| | | This approach will enable the Applicant to take into account the as laid location of the WB Project's 400kV grid connection cable into the detailed design of the BESS post consent, whilst also ensuring that if the cable has not yet been installed, the flexibility for siting the cable secured in the WB Order will not be reduced. Any reduction in the width of the cable corridor to ensure a safe distance between the cable and BESS has the potential to impede delivery of the WB Project should engineering constraints require the cable to be located within the northern extent of the cable corridor. | |
| RR-044/2 | Permissive Paths | The Works Plans **[APP-007]**, on sheet 6, provide for a permissive path between Littleborough Road and Fenton Lane. The alignment of this permissive path is routed along the western edge of the WB Cable Corridor.<br><br>WBSP has no in principle objection to the proposed permissive path in this location. However, it wishes to note that, as part of the laying of the WB grid connection cable, WBSP will be acquiring an easement that includes the necessary rights to access the land to maintain and repair the cable. In the event of a failure of the WB grid connection cable requiring maintenance or replacement, it may be necessary to temporarily close the permissive path whilst works are ongoing. To ensure that such a closure does not create a conflict with the obligations for the Applicant to maintain the permissive path, WBSP requests that this unlikely but possible circumstance is specifically acknowledged in the draft DCO or outline management plans to | |

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| | | ensure that WBSP's requirement to maintain the cable does not cause any breach of the Applicant's obligations in respect of this path. | |
| RR-044/3 | National Grid substation works | The Land Plans **[APP-006]** show that the Applicant is seeking compulsory acquisition of rights over plots 05/10 and 05/11. Included within these plots is the land required for WB Work No. 4, being the works to the National Grid substation to connect WB to the National Grid. WBSP did not include powers of compulsory acquisition over the land required for WB Work No. 4, with these works being carried out wholly with the agreement of National Grid under the terms of the Grid Connection Agreement.<br><br>In order to ensure that the Scheme proposals do not interfere with the delivery of the WB Project, WBSP requests that its interests are specifically excluded in the Book of Reference from being subject to any compulsory acquisition powers within the WB Work No. 4 area. The protective provisions for WBSP must also be amended so as to include the same protections for WB Work No. 4 as are envisaged for WB Work No. 5. | |
| RR-044/4 | Omissions from the Book of Reference | The Book of Reference **[APP-046]** lists a number of land plots in which the Applicant has identified an interest held by WBSP. The land plots listed appear to *only* include those areas of land in which the Applicant has agreed an Option to lease the necessary land and rights for the WB Project. The Book of Reference does not identify all land plots in which WBSP holds powers to compulsorily acquire land and rights in land for the purposes of | |

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| | | the WB Project pursuant to the WB Order (such powers being registered as a local land charge).<br><br>As a result of this omission, the extent of interaction between the Scheme and the WB Project is difficult to accurately ascertain.<br><br>In order to resolve this, WBSP request that the Book of Reference is updated to include WBSP's existing compulsory acquisition rights where relevant. To assist, the Appendix to this Representation provides a list of all plot numbers where WBSP believes it benefits from powers of compulsory acquisition. This list has been drawn up by reference to the GIS outline of the Scheme draft Order Limits, however it is requested that the Land Plan GIS files are shared with WBSP in order that this list may be confirmed to ensure all such plots have been identified. | |
| RR-044/5 | Opportunities for cooperation | In reviewing the plans, WBSP has identified that the proposed access into the Scheme's BESS area is located approximately 150m to the east of access AC102 for the WB Project. Access AC102 will be used by WBSP when constructing the WB Project's 400kV grid connection cable.<br>The northern side of Common Lane is lined with hedgerow. In order to provide an access to the north, a length of hedgerow must be temporarily removed. There is therefore an opportunity in this location to reduce the cumulative effects of the WB Project and the Scheme by utilising the same access point. WBSP is keen to explore the potential for both projects to share an access in this location in order to minimise the overall hedgerow removal. | |

# 3. Multiple common relevant representations

3.1. This chapter provides the Applicant's response to the key themes that were commonly raised in the Relevant Representations.

## 3.2. Common response A: General Opposition to the Proposed Development

3.2.1. The Applicant acknowledges that there have been a range of views expressed with some in principal opposition to the Proposed Development.

3.2.2. However, the UK has made a legally binding commitment to achieve net zero carbon emissions by 2050. This can only be achieved with the roll-out of reliable, affordable, clean energy sources such as solar. Solar energy, being one of the most cost-effective and rapidly deployable renewable technologies, will play a vital role in meeting these national objectives. However, this scale of deployment cannot be achieved through rooftop and brownfield installations alone, which face significant practical limitations. Many domestic and industrial buildings are either structurally unsuitable, lack the necessary grid connectivity, or are cost-prohibitive due to high initial installation expenses.

3.2.3. As a result, ground-mounted solar installations—particularly on agricultural land—are essential to delivering the volume of solar power required. Their contribution is not only practical, but necessary, to secure a clean, reliable, and affordable energy future for the UK.

3.2.4. A Statement of Need was included in the Applicant's **Planning Statement [APP-182]** submitted as part of the application, explaining the reasons for the Proposed Development setting out the context, requirement and contribution of the Proposed Development to securing and decarbonising UK energy supply. The Applicant is committed to the opportunity to repower the region with clean, green and affordable energy and replace the energy produced by the West Burton A power Station.

## 3.3. Common Response B: Consultation Fatigue

3.3.1. The Applicant acknowledges the presence of several consented and proposed solar energy schemes within Nottinghamshire and Lincolnshire, situated in proximity to the Proposed Development. The Applicant is also aware that the local community has been engaged in numerous public consultations relating to multiple Nationally Significant Infrastructure Projects (NSIPs) within the local area, which has, understandably, resulted in a degree of consultation fatigue among residents and stakeholders.

3.3.2. In accordance with the duty to consult the local community under Section 47 of the Planning Act 2008 (PA 2008), the Applicant undertook two phases of public consultation in relation to the Proposed Development. Both phases were designed to be as accessible, transparent, and straightforward as possible to encourage effective participation from the local community.

For the statutory consultation, a Statement of Community Consultation (SoCC) was prepared, consulted upon, and subsequently published in compliance with the requirements of Section 47 of the PA 2008. The SoCC set out the Applicant's approach to community engagement, including the methods and channels to be used to inform and consult those potentially affected by the Proposed

Development. The approach set out within the SoCC was agreed with Nottinghamshire County Council and Bassetlaw District Council prior to commencement of the statutory consultation.

3.3.3. Both phases of consultation were well attended and generated meaningful engagement from the local community. Across both phases, the Applicant received a total of 312 responses, with a notable increase in participation during the statutory consultation phase, demonstrating the effectiveness of the Applicant's consultation strategy.

## 3.4. Common Response C: BESS Safety and Fire Risk

3.4.1. Battery storage is an integral component of renewable energy technologies, storing excess energy during periods of peak generation or low demand and releasing it during peak demand or in case of power outages. This safe and proven technology would support the Proposed Development to generate a consistent and reliable renewably generated power supply, even when the sun is not shining.

3.4.2. Battery storage as part of the Proposed Development has been located within the land areas to minimise impacts on any relevant designations and local communities, while remaining accessible for maintenance.

3.4.3. The technology underpinning battery storage is well established and extensively used in various facets of our daily lives. The battery units proposed for the Proposed Development have long lives, charging and discharging thousands of times.

3.4.4. **ES Volume 2, Appendix 4.3, Outline Fire Risk Management Plan [APP-091]** has been developed, which outline the Applicant's strategies, protocols, and commitments, ensuring that battery storage at the Proposed Development adheres to the highest standards and contributes seamlessly to the overall success of the Proposed Development.

## 3.5. Common Response D: Cumulative Effects

3.5.1. The Applicant is cognisant of other projects being proposed in the area and has undertaken assessments to consider the potential cumulative effect of this. Any new developments will need to go through the relevant planning regime. If an Environmental Impact Assessment is required for other future development, they will have to consider cumulative impacts of that project, with others in the area.

3.5.2. The cumulative impacts of the Proposed Development alongside other developments in close proximity to the Site have been fully assessed across all technical chapters scoped into the ES. Refer to **ES Volume 1, Chapter 6 through to Chapter 17 [APP-064 – APP-074]** of the cumulative effects assessment. The cumulative effects assessment can only cover developments which are consented or have a progressed design, the assessment considered a number of projects, the full list of which is listed in **Appendix 2.3 Cumulative Sites Long List and Short List [APP-088].** This list included the following projects:

- West Burton A Demolition
- Wood Lane Solar Farm
- Sturton-le-Steeple Quarry
- Bole Ings Ash Disposal Site
- National Grid North Humber to High Marnham

- One Earth Solar Farm

3.5.3. The Applicant acknowledges that STEP is not included in the Cumulative Sites Long List and Short List. As STEP does not have a design as yet, this project cannot be assessed in the cumulative assessment. At the EIA stage of the STEP DCO application, which will then have a detailed design, the potential effects in conjunction with the Proposed Development will be assessed. The **Appendix 2.3 Cumulative Sites Long List and Short List** [APP-088] sets out a clear methodology used for the identification of cumulative sites and explains why STEP was not included in more detail at paragraph 1.1.7.

3.5.4. The Applicant acknowledges the presence of multiple energy developments visible within the same landscape can give rise to greater overall or cumulative effects on landscape character than the presence of a single development. However, in landscapes where energy infrastructure is already established, the incremental effect of additional developments is likely to be less pronounced than that associated with the introduction of the first scheme. In such contexts, as the baseline landscape becomes increasingly characterised by existing energy infrastructure, the relative significance of further developments in landscape character terms typically diminishes.

3.5.5. The Proposed Development is anticipated to result in some limited, localised significant effects on landscape character. This cumulative assessment therefore considers whether the inclusion of other consented or proposed schemes would alter those findings.

3.5.6. The potential for significant cumulative effects on landscape character is considered limited. Should other consented and proposed energy developments come forward, the wider landscape would already be characterised by energy infrastructure. This would not materially change the nature or significance of the effects associated with the Proposed Development. A full summary of the cumulative effects identified in each of the technical ES chapters (Chapters 6 – 17) is included at Table 18.4 of **Chapter 18: Summary [APP-075].**

## 3.6. Common Response E: Use of Best and Most Versatile Land

3.6.1. The Applicant acknowledges concerns regarding the potential loss of agricultural land both locally and nationally. However, it is important to note that only 0.06% of land in the UK is currently occupied by solar infrastructure, and even if the UK were to achieve a 70GW solar capacity, this would represent just 0.4% of national land area.

3.6.2. The Applicant has sought to minimise impacts on BMV land through the design of the Proposed Development and ALC ratings as well as agricultural land productivity. This includes through discussions with landowners and minimising the impact of the Proposed Development on the landowners' wider land holdings. Effectively the Proposed Development minimises impacts on agricultural land, retaining the ability to reinstate arable agricultural land after decommissioning as well as allowing soils to rest in the interim. Panel areas will still support grazing through biodiversity management and therefore continue to contribute as an agricultural resource. However, it is noted that food security and food production isn't a relevant consideration under the NPS. The effects of the

Proposed Development on agricultural land use have been comprehensively assessed within **ES Volume 1, Chapter 15: Land Use and Agriculture [APP-072].**

3.6.3. The Applicant has carefully considered the Best and Most Versatile (BMV) land principles throughout site selection and design. BMV land, defined as Grades 1, 2, and 3a in the Agricultural Land Classification system, represents the most productive and flexible agricultural soils. In line with the National Planning Policy Framework (NPPF) and associated guidance, the Proposed Development seeks to avoid BMV land wherever practicable and to minimise the use of higher-quality soils. Where BMV land is unavoidably included, the Proposed Development design ensures that its temporary and reversible nature allows the land to be restored to its former agricultural condition following decommissioning.

3.6.4. The Proposed Development has been brought forward in accordance with the National Policy Statement for Energy (EN-1), which identifies an urgent need for new, low-carbon, nationally significant energy infrastructure, and the National Policy Statement for Renewable Energy Infrastructure (EN-3), which provides specific policy support for solar generation projects.

## 3.7. Common Response F: Food Security

3.7.1. The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The Energy Security Strategy (April 2022) set an ambition of 70 GW of solar by 2035.

3.7.2. The current Labour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve “Clean Power by 2030”, including tripling solar power by 2030. This cannot be achieved through rooftop and brownfield solar installations alone, as they have considerable practical barriers of their own. Many domestic and industrial buildings either do not have roofs made of suitable material to support a solar system, do not have the infrastructure to export electricity to the gird, or simply present as an unaffordable solution, with initial costs of installation too high for some. As a result, ground mounted solar, on agricultural land in a necessity to deliver the quantum of solar power needed.

3.7.3. The Proposed Development can still be used for grazing and can support continued food production. The independent National Food Strategy Review shows that solar farms do not in any way present a risk to the UK’s food security. Indeed, the reverse is true: the solar industry is working closely with Britain’s farmers to reduce their energy costs and improve the sustainability of their operations. Further, where a solar farm is installed on land which has been intensively farmed, it enables the ground underneath to recover. Solar farms also help regenerate soil quality and so are helping to ensure the continued availability of high-quality agricultural acreage for future generations.

## 3.8. Common Response G: Solar should be placed on rooftops or brownfield land

3.8.1. The UK Government has set an expectation of reaching 70 GW of installed solar capacity by 2035, a fivefold increase on the current installed capacity. This cannot be achieved through rooftop and brownfield solar installations alone, as they have considerable practical barriers of their own

3.8.2. A search was undertaken of the potential brownfield land (including rooftops within residential areas) within the prescribed 15km Area of Search form the point of connection at West Burton Power Station, which identified that there were no sites or combinations of sites, that had the necessary footprint to accommodate the Proposed Development on brownfield land. This is set out in **ES Volume 1, Chapter 3 - Site Description, Site Selection and Iterative Design Process [APP-061] and the Design and Access Statement [APP-184].**

## 3.9. Common Response H: General concern regarding impact on Wildlife

3.9.1. The Applicant acknowledges that the Site supports biodiversity and a range of species and flora and fauna. Detailed surveys and studies have been completed by independent ecological consultants to establish the pre-development ecological baseline, and these have informed the design process, the scope of which was agreed with consultees.

3.9.2. The Proposed Development retains, protects and enhances the majority of the habitats with increased biodiversity value such as hedgerows, arable field margins, woodlands, trees, watercourses, and ponds. Significant areas of new habitats are proposed including wetlands, woodland, hedgerows and meadow grassland.

3.9.3. An assessment of the biodiversity value, as assessed via the Statutory Biodiversity Metric Tool, has been undertaken to evaluate the habitats on Site, **ES Volume 2, Appendix 7.12, Biodiversity Net Gain [APP-114]** this concludes that the Applicant is able to achieve at least a 10% gain.

3.9.4. An Ecological Impact Assessment has also been undertaken to evaluate the ecologically important features on the Site and how they may be affected by the Proposed Development **ES Volume 1, Chapter 7 - Ecology & Biodiversity [APP-065] and Appendices associated with Chapter 7 – Ecology & Biodiversity [APP-103 -APP-116].**

3.9.5. With mitigation in place, no significant adverse effects on designated nature conservation sites or important habitats are likely. Most species-impacts are scoped out, or are likely to be neutral, not significant, or slightly beneficial in the long-term. Effects on skylark are assessed as adverse (locally significant).

## 3.10. Common Response I: General concern regarding noise and vibration

3.10.1. The Applicant acknowledges that some sound and vibration could be generated during the construction, operation and decommissioning of the Proposed Development via the use of certain construction plant, the operation of various ancillary electrical equipment and the additional traffic generated by the Proposed Development in isolative and cumulative terms.

3.10.2. **ES Volume 1, Chapter 11 – Noise and Vibration [APP-061]** addresses all relevant potential sound and vibratory effects from the introduction of the Proposed Development, concluding that sound and vibration generated during the temporary construction, operation and decommissioning of the site is considered not significant in the context of normal planning requirements, provided that typical mitigation measures are implemented and that best practice is followed.

## 3.11. Common Response J: General concern regarding the impact of the Proposed Development on traffic

3.11.1. Suitable management and mitigation for the proposals have been carefully considered so as to minimise the impact of construction traffic during the construction phase and the operation phase. This is considered in **ES Volume 1, Chapter 13 - Transport and Access [APP-071],** which includes **ES Volume 2, Appendix 13.1, Transport Assessment [APP-128] and ES Volume 2, Appendix 13.2, Outline Construction Traffic Management Plan [APP-129]** as supporting documents. Traffic during the operational period will be minimal as it will be limited to around seven staff trips associated with maintenance/monitoring on a regular basis and the occasional equipment replacement by larger vehicle as needed.

## 3.12. Common Response K: General concern regarding the size and scale of the Proposed Development

3.12.1. A Statement of Need has been included in the **Planning Statement [APP-182]** submitted as part of the application, explaining the reasons for the Proposed Development being large scale solar generation, and setting out the context, requirement and contribution of the Proposed Development to securing and decarbonising UK energy supply. The Applicant is committed to the opportunity to repower the region with clean, green and affordable energy and replace the energy produced by the West Burton A power Station. Paragraph 5.1.3 of the Planning Statement sets out that the principal need for the Proposed Development centres on the significant contribution it will make to the three important national energy policy aims of decarbonisation, security of supply, and affordability. In particular, the Proposed Development will generate 600MW of low carbon electricity equating to the annual energy consumption of approximately 180,000 households (roughly half the homes in Nottinghamshire).

3.12.2. Additionally, as part of the DCO process the Applicant carried out an Environmental Impact Assessment (EIA) to assess the likely significant effects (both positive and negative) the Proposed

Development could have on the environment and local area. **ES Volume 1, Chapters 6-16 [APP-064 – APP-073]** provide details of a wide range of topics and the respective findings.

## 3.13. Common Response L: Scepticism over the efficiency of solar

3.13.1. The Applicant notes the comments regarding the efficiency of solar energy generation in the UK. Modern solar photovoltaic (PV) technology is designed to generate electricity from both direct and diffuse sunlight, meaning panels continue to operate effectively even under cloudy conditions.

3.13.2. Solar efficiency is influenced by solar irradiance—the amount of sunlight received per square metre—which varies across the UK depending on factors such as location, climate, and topography. The east of England benefits from relatively high irradiance levels and flat, open land, making it well suited for large-scale solar development.

3.13.3. The UK's solar resource is sufficient to support reliable and cost-effective energy generation, and advances in PV technology continue to improve performance. The inclusion of a Battery Energy Storage System (BESS) will further enhance efficiency by storing surplus energy and exporting it to the grid when demand is high, helping to maximise the overall effectiveness and stability of the Proposed Development.

## 3.14. Common Response M: Increased Flood Risk

3.14.1. With respect to concerns regarding potential increased flood risk to North Leverton and Sturton-le-Steeple, the Applicant acknowledges the recent flooding issues in Sturton-le-Steeple, North Leverton, South Wheatley and the surrounding area. Runoff from the Proposed Development will be managed through the use of Sustainable Drainage Systems (SuDS), whereby runoff will be intercepted by strategically positioned swales and contained within attenuation basins prior to a controlled discharge to local watercourses at greenfield rates. The drainage strategy has been designed to cater for the 1 in 100 year plus climate change event and has been developed in consultation with Nottinghamshire County Council as Lead Local Flood Authority and the Internal Drainage Board.

3.14.2. **ES Appendix 8.2 Surface Water Drainage Strategy [APP-120**] demonstrates that runoff rates will not be increased as a result of the Proposed Development and takes into account extreme (1 in 100 year) events as well as the permeability of the soils. The Construction Environmental Management Plan (CEMP) (secured by Requirement 7 of the **dDCO [APP-041])** will build on details provided in the Outline **Construction Environmental Management Plan (oCEMP) [APP-089]** and include measures for control of runoff during the construction phase and a commitment to repair any field drains damaged during construction.

3.14.3. In addition to ensuring there is no increase in runoff from the Proposed Development, the Applicant has committed to providing additional measures which aim to provide a positive reduction in the existing flood risk to Sturton-le-Steeple. This will be achieved by providing large detention basins positioned strategically to intercept existing flow paths and store runoff from the fields that currently flows uncontrolled towards the village resulting in flooding on the roads in the centre of the village.

This is an additional voluntary measure for the benefit of the local community and is separate to the measures proposed to control runoff from the Proposed Development.

3.14.4. The cumulative impact of surface water runoff has been addressed in **ES Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066].** Given there will be no increase in runoff from the Proposed Development (with a positive reduction in flood risk resulting from the flood reduction measures for Sturton-le-Steeple) and that other nearby developments will similarly be required to demonstrate no increase in flood risk, the cumulative impact is negligible. SuDS will be managed by the site operator and detailed within the Operational Environmental Management Plan (secured by Requirement 9 of the **dDCO [APP-041])** that builds on details provided in the **Outline Operational Environmental Management Plan (oOEMP) [APP-092].**

3.14.5. The Applicant acknowledges the location of the Proposed Development is within Flood Zones 2 and 3 and is at risk from surface water. The potential for displacement of floodwater has been considered within **Section 8.1 of ES Appendix 8.1 Flood Risk Assessment [APP-117 to APP-119].** This explains that there is no built development within the defended 1 in 100 year plus climate change flood extent for the River Trent and therefore no loss of storage for the River Trent during this 'design' event. It also explains that the flood risk from other sources results in negligible flood depths in areas of proposed infrastructure, and that the infrastructure in these areas would comprise panel supports only which, due to their very limited cross-sectional area, would result in negligible displacement of floodwater. The Flood Risk Assessment considers the appropriate climate change scenarios over the 40-year lifetime of the development in accordance with current Environment Agency guidance "Flood risk assessments: climate change allowances" (last updated May 2022).

3.14.6. **The Flood Risk Sequential Assessment and Exception Test [APP-186 to APP-189]** demonstrates that there are no reasonably available sites at a lower risk of flooding that would be suitable for the Proposed Development.

3.14.7. Impacts of wheel washing during construction would be managed via the CEMP, which would include temporary drainage measures for the construction phase to ensure there is no increase in flood risk

## 3.15. Common Response N: Economic Impact on the local farming community

3.15.1. The Applicant acknowledges that the Proposed Development is set to be located on land which has historically been used for farming. There are seven principal farming occupations within the Site, some occupying several blocks of land and are mostly occupied on a rented basis.

2.15.2 The EIA **ES Volume 1, Chapter 15: Land Use and Agriculture [APP-072]** indicates that the farm businesses are full-time mostly arable enterprises and are considered resilient to a degree of change. The Applicant acknowledges that the effects especially on the farm businesses, will be significant for those businesses but, in environmental impact assessment terms the effect will be a minor adverse effect which is not significant. Once the Proposed Development is decommissioned the land will be returned to its current condition and returned to the landowner.

## 3.16. Common Response O: Impact on the local landscape

3.16.1. The Applicant acknowledges that the Proposed Development would result in landscape and visual effects, particularly in relation to the local public rights of way (PROW) network and views from Sturton le Steeple. However, these effects have been carefully considered through the design process and are expected to be localised and limited in nature, with a comprehensive package of mitigation and enhancement measures incorporated to reduce impacts and integrate the scheme into the existing landscape setting.

3.16.2. As detailed within the **Design and Access Statement [APP-184],** the design has evolved to minimise visual intrusion, including the removal of infrastructure from a 40–55m corridor along the eastern edge of the western parcel to reduce potential effects on the edge of Sturton le Steeple. The development has also been designed with a maximum solar panel height of 3 metres, and larger infrastructure, such as the substation and Battery Energy Storage System, has been located adjacent to West Burton Power Station, where their scale is more consistent with the surrounding built form.

3.16.3. Further landscape mitigation and enhancement measures are set out in the **Outline Landscape and Environmental Management Plan (LEMP) ES Volume 2, Appendix 7.14 [APP-116].** These include woodland and shelterbelt planting, native tree and shrub planting, and ongoing landscape management to soften views, strengthen field boundaries, and enhance local landscape character over time.

3.16.4. **ES Volume 1, Chapters 6 [APP-064]** also assesses cumulative landscape and visual effects alongside other proposed developments in the area. This assessment concludes that, following implementation of mitigation and planting, the Proposed Development would not give rise to significant adverse individual or cumulative landscape or visual effects, and would be capable of being successfully accommodated within the local landscape conte

# 4. Public Relevant Representations

4.1.1 This section sets out the responses to the Relevant Representations from members of the public and the response from the Applicant.

## Table 4-1: RR-01 Robert Byatt

| RR Ref | Comment from Relevant Representation | Applicant Response |
|---|---|---|
| RR-001 | There are plans to surround our homes with solar farms, covering farmland that has provided local produce for hundreds of years.<br><br>This will drive out local farmers putting them out of work and forever changing our area and way of life. This on top of the many other projects in the village such as a quarry that was approved and a new fusion power plant planned to replace west Burton power station, together these projects threaten to change our quiet picturesque village into an industrial site. This is our home and we want to retain our way of life without being surrounded by steel and glass. Please consider our farmers and the people who live here over the profit seeking corporations who have no ties to this place and do not care what happens to the land. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• D: Cumulative Effects<br>• N: Economic Impact on the local farming community<br>• O: Impact on the local landscape<br><br>As part of the DCO process the Applicant has carried out an Environmental Impact Assessment (EIA) to assess the likely significant effects (both positive and negative) the Proposed Development could have on the environment and local communities. The **ES [APP-057 to APP-177]** provides details on a wide range of topics such as landscape and visual, biodiversity, cultural heritage, flood risk, traffic, noise and other considerations. As a result, no significant impacts are predicted upon the local communities. |

## Table 4-2: RR-003 Alan Barber

| RR Ref | Comment from Relevant Representation | Applicant Response |
|---|---|---|
| RR-003 | The main issues will be it will be an eye sore to the village, it will take out farming land and I must say good farming land which grows food for the country, it will affect house prices in the village also affect will cause major issues with traffic coming through the village.<br><br>This will major issues for the wildlife, people's homes, livelihoods, it will cause more noise pollution and isn't good for the environment either, solar panels should be on the roof NOT on farm land!!! | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• E: Use of Most Versatile Agricultural Land<br>• F: Food Security<br>• J: General concern regarding the impact of the Proposed Development on traffic<br>• G: Solar should be placed on rooftops or brownfield land<br>• H: General concern regarding impact on wildlife<br>• I: General concern regarding noise and vibration<br><br>The Applicant acknowledges the concerns raised in relation to changes in property value as a result of the Proposed Development. It is not considered that the Proposed Development would impact property value. Furthermore, property values are not a material planning consideration. |

## Table 4-3: RR-006 Karen Hodgson

| RR Ref | Comment from Relevant Representation | Applicant Response |
|---|---|---|
| RR-006 | 1. Concern about the large number of solar 'farms' seeking approval that are on productive farm land and the consequences for food security.<br>2. Concern that the government is conducting the Land Use Framework to assess the best use of our valuable land and resources whilst NSIPS like this project are being approved. Certain projects should be put on hold until this assessment is completed.<br>3. Concern that huge areas, in the East of England particularly are subject to new infrastructures which will completely alter and impact negatively on the countryside. The area of Sturton Lee Steeple is already subject to a large number of such projects.<br>4. The Cumulative Impact is too overwhelming for local people-disruption, change of environment and the number of projects and complexities involved mean local people are not able to understand the nature of so many projects and have a fair chance to have their say.<br>5. These projects are being pushed through by developers and land owners and government not because it is the best way forward to get to a green economy which is crucial but because the land happens to become available and solar company's can guarantee | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• A: General Opposition to the Proposed Development<br>• F: Food Security<br>• D: Cumulative effects<br>• E: Use of Best and Most Versatile Land<br>• H: General concern regarding impact on wildlife<br>• J: General concern regarding the impact of the Proposed Development on traffic<br>The Applicant is a wholly owned subsidiary of RES UK & Ireland Limited, a company incorporated in England and Wales with company number 04913493. That company is in turn a wholly owned subsidiary of Renewable Energy Systems Holdings Limited, a company incorporated in England and Wales with company number 04913497. Renewable Energy Systems Holdings Limited is ultimately owned by the McAlpine Family.<br>The Renewable Energy Systems Holdings Limited group of companies is the world's largest independent renewable energy developer and is active in onshore and offshore wind, solar, energy storage, green hydrogen, transmission and distribution. As an industry innovator for |

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| | a fixed price for the energy they produce and make money for those concerned without there being a clear strategy and long term plan to reach net zero and protect all the many competing demands . Hence the governments own Land Use Framework plan.<br>6. Many of the developers mitigations and promises are misleading and not evidenced in terms of they will meet these promises. They do not have a track record or experience of such large scale solar farms I this country<br>7. For example - the local wildlife will be negatively impacted and harmed . There are protected species<br>8. The local road network cannot safely manage the impact of large numbers of heavy vehicle and increased traffic.<br>9. Construction and set up of the 'farm 'is likely to be labour contracted and coming in from afar and short term - not local and ongoing jobs. | over 40 years, the RES Group have delivered more than 283GW of renewable energy projects across the globe and support an operational asset portfolio exceeding 4312GW worldwide for a large client base.<br>The Applicant acknowledges concern about the potential jobs created during the construction phase of the Proposed Development. The Applicant has considered job creation and how this benefit can be maximised locally, this is highlighted in **ES Volume 1, Chapter 10 – Socio Economics [APP-068].** |

## Table 4-4: RR-006 Jeanette Harris

| RR Ref | Comment from Relevant Representation | Applicant Response |
|---|---|---|
| RR-007 | The sheer mass scale of this steeple renewable project in itself is daunting to surround a whole village and surrounding villages on every side, using food grade productive arable farm land, but not only that we are overwhelmed with so many other localised projects such as: -Decommissioning of west burton power station -west burton steps nuclear project -west burton C power station BESS -Sturton le steeple quarry -Wood lane solar project -Bumble Bee Farm solar project -West Burton Solar and BESS -National grid upgrade -Sturton road solar -Decommissioning of Cottam power station -Cottam power station BESS -Cottam solar & BESS -Gate Burton solar & BESS -Tillbridge lane solar & BESS -Torksey Ferry Road BESS -Tiln Lane Solar & BESS -Stowe farm solar & BESS. These are what I know of and will search further.<br><br>This is a rural & Farming community and is suffering at the staggering rate of industrialisation. I myself say enough is enough the combined impact of all the above along with the STURTON RENEWABLES IS MORE THAN A COMMUNITY SUCH AS OURS SHOULD ENDURE. My conclusion being that the addition of Sturton Renewables solar project is detrimental to us we are so overwhelmed I feel I can not engage with this project | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• A: General Opposition to the Proposed Development<br>• B: Consultation Fatigue<br>• D: Cumulative effects<br>• K: General concern regarding the size and scale of the Proposed Development<br>• N: Economic Impact on the local farming community |

## Table 4-5: RR-008 Lee Broad

| RR Ref | Comment from Relevant Representation | Applicant Response |
|---|---|---|
| RR-008 | Loss of livelihoods and arable land in a time when people have less money and we don't have enough food. 800,000 panels built in China using fossil fuels, shipped to the UK using fossil fuels and after 30 years they are dumped as not recyclable. How is this green? The amount of sun hours we have will not provide much power and on cloudy days the panels don't provide much power. Loss of habitat for the animals. This is a joke and Miliband should hang his head in shame for selling us out. The green tax is a scam and all the other counties are laughing at us. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• F: Food Security<br>• H: General concern regarding impact on Wildlife<br>• M: Increased flood risk<br>The Applicant notes the concerns raised regarding $CO_2$ emissions associated with the manufacture of solar panels. Whilst it is recognised that a significant proportion of components are likely to be sourced from China, which currently dominates global solar supply chains, the overall carbon payback period of the Proposed Development has been calculated and assessed within the **ES Chapter 12: Climate Change [APP-070]**. This demonstrates the number of years required for the project's greenhouse gas (GHG) savings to offset the emissions generated during its lifecycle.<br><br>Where practicable, the Applicant will seek to source materials locally to reduce transport-related emissions. The total anticipated GHG emissions associated with the construction, operation, and decommissioning of the Proposed Development are 461,300 $tCO_2e$, as detailed within the ES. Despite the embodied carbon of panel manufacture, the project will deliver substantial long-term GHG reductions, achieving a clear net carbon benefit over its operational lifetime. |

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|---|---|---|
| | | Waste is considered on a reasonable worse case basis and addressed in **ES Chapter 17: Miscellaneous Issues [APP-074]**.<br><br>Potential waste generation at each stage of development (construction, operation (and maintenance) and decommissioning) has been considered along with how waste will be disposed of.<br><br>During construction, operation, and decommissioning, the re-use or recycling of materials will be explored before resorting to landfill options. The Applicant's approach to waste during the construction, operation and decommissioning phase is set out in the **ES Appendix 4.1 Outline Construction and Environmental Management Plan oCEMP) [APP-089]**, **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]** and **ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [APP-092]** with final versions of those documents secured by Requirements 7 (CEMP) Requirement 9 (OEMP) and Requirement 21 (Decommissioning and Restoration) of the **dDCO [APP-041]**. There would be no significant residual effects on waste from the Proposed Development.<br><br>The Applicant has followed the waste hierarchy and will ensure as much waste as possible is recycled with landfill the last resort and worst case. The quantum of waste that could not be recycled or reused is limited. Paragraphs 17.5.22 to 17.5.38 of **ES Chapter 17: Miscellaneous Issues [APP-074]** confirm PV Solar Panels will mainly be a waste source at decommissioning stage. They will be recycled or reused, where |

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| | | possible. With regards to the supporting structures, the structures will be unscrewed/unbolted and then removed from the ground using a piling machine. Once the supporting structures have been removed, they will either be re-used or recycled, where possible. Only a small amount of backfilling will be required to fill the holes of the supporting structures.<br><br>Currently 95% of the materials used to make PV solar panels can be recovered and recycled. |

## Table 4-6: RR-009 John Bowler

| RR Ref | Comment from Relevant Representation | Applicant Response |
|---|---|---|
| RR-009 | I contend, as a drainage engineer for more than 30 years, that these proposals will exacerbate the propensity for flooding to the villages of North Leverton and Sturton le Steeple by substantially increasing the rate of surface water runoff into the existing land drainage systems. Both villages, and nearby South Wheatley have suffered severe flooding on numerous occasions, and the reduction of vast areas of natural infiltration and evaporation will inevitably increase the potential for further such events. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• M: Increased flood risk |

## Table 4-7: RR-010 Adrian Peter Conn

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-010 | This is an objection to this proposal. This proposed project is colossal, completely enveloping the village of Sturton le Steeple and utilising 1700 ACRES of prime, high grade farming land. Two thirds of these massive "mega" solar farms are being built on productive and utilised farming land. Food security needs to be considered for the UK. It will decimate the local farming economy and result in the loss of livelihoods of four tenant farmers, their staff and the supporting industries (e.g. grain merchants, agricultural services, contractors). It will destroy local diversity and ecology.<br><br>Deer, badgers, rabbits, hare, bats, migratory and indigenous birds including barn owls, hawks, fieldfares will all be permanently displaced. Questionable "desk top" surveys conducted by the developer around ecology and more significantly, land quality providing them favourable results for the project to proceed. (e.g. the land quality on some of the fields under consideration for development is significantly higher than that indicated in the surveys). The area in and around Sturton le Steeple is already under threat of multiple other developments, some which are proposed, some which are already granted. The STEP nuclear fusion plant, the second gas power station (both on the West Burton Power Station site), The Wood Lane Solar, The Aggregate Quarry, and no fewer than 4 other solar farms all within a 5-mile radius. Enough is enough! Drainage of run off water from the fields is highly likely to significantly increase once covered in solar panels, resulting in local flooding. This | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• A: General opposition to the Proposed Development<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• F: Food Security<br>• H: General concern regarding impact on Wildlife<br>• K: General concern regarding the size and scale of the Proposed Development<br>• M: Increased flood risk<br>• L: Scepticism over the efficiency of solar<br>• N: Economic Impact on the local farming community<br><br>The Applicant notes the comment about the use of desk top surveys as part of the environmental and ecological assessment works. The ecological survey reports include a 'desk study' element, in line with industry guidance for undertaking and Ecological Impact Assessment (such as CIEEM guidance for undertaking EcIA). This information is used to augment the field data and provide historical context to the assessments |

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| | has already been an issue in Sturton le Steeple and North Leverton villages and will worsen under these proposals. Solar farms in general are highly inefficient and produced only the claimed output figures under optimal conditions (something rarely see here in the UK). They also have a significant carbon footprint in their manufacture and shipping often from half way around the world (e.g. China). The developer has failed to provide these carbon emission figures at any point in their discussions with the local community and stakeholders. | The Applicant notes the concerns raised regarding $CO_2$ emissions associated with the manufacture of solar panels. While it is recognised that a significant proportion of components are likely to be sourced from China, which currently dominates global solar supply chains, the overall carbon payback period of the Proposed Development has been calculated and assessed within the **ES Chapter 12: Climate Change [APP-070]**. This demonstrates the number of years required for the project's GHG savings to offset the emissions generated during its lifecycle.<br><br>Where practicable, the Applicant will seek to source materials locally to reduce transport-related emissions. The total anticipated GHG emissions associated with the construction, operation, and decommissioning of the Proposed Development are 461,300 $tCO_2e$, as detailed within the ES. Despite the embodied carbon of panel manufacture, the project will deliver substantial long-term GHG reductions, achieving a clear net carbon benefit over its operational lifetime. |

## Table 4-8: RR-014 Stacey Attenbrow

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-014 | Strongly oppose this project as it removes farming land from the local area. Also affecting wildlife. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• E: Use of Best and Most Versatile Land<br>• H: General concern regarding impact on wildlife |

## Table 4-9: RR-015 Rebecca Copeland

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-015 | There will be substantial damage to wildlife in the area. What wildlife counts have been done and what is going to happen to disturbed wildlife. We are near the Trent and have numerous different birds and animals. How are you going to mitigate the disturbance and death this will cause? How do you know what species are in the area and will be affected. There is the total impact of all of these works to the community.<br><br>There are over 20 different projects in this small area and that is too much for one community to bare. The pollution from all of the works for this project and the power station project and many other projects such as the lithium battery project. The effect to our own health from the increase in traffic and heavy vehicles travelling in our village area. We | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• B: Consultation Fatigue<br>• C: BESS Safety and Fire Risk<br>• D: Cumulative effects<br>• H: General concern regarding impact on Wildlife<br>• J: General concern regarding the impact of the Proposed Development on traffic<br>• L: Scepticism over the efficiency of solar<br>The Applicant notes the comments regarding construction and traffic impacts. **ES Appendix 4.1: Outline Construction Environmental Management Plan (oCEMP) [APP-089]** sets out how construction |

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| | are a very outdoor family and have a horse who we ride all over the area. There will be increase traffic that will put my daughter at risk plus a reduction in the area she can ride. Nobody is looking at the total impact of all of the traffic and works to our community. Why should one community bare all of this? The environment will suffer due to pollution during this installation stage. The worry you are adding to peoples lives with the lithium batteries being so bad for health, if those set on fire what is going to happen to our very small community. The blowing up of the power stations makes me worry about what is in the air. Is there asbestos, has anyone tested the air and the debris that has been created. Are you making us sick long term. The flood risk will be greatly increased. There are no sound plans to deal with the risk. Water will run off the land and into homes and the village. The solar panels will make minimal difference to energy provision. They do not hold energy and will make such a small difference this is just a tick box exercise that looks good and will make a lot of people rich. Somebody should look at the total effect of all of the projects due to take place in this area. It is too much for one small community. There must be other options and the other options that have been considered should be made known to us. | activities will be managed. The oCEMP includes strategies for site management, stakeholder engagement, environmental protection, community impact, health and safety, and monitoring and compliance, including measures to mitigate dust impacts on nearby sensitive human and ecological receptors.<br><br>Air quality has been considered in **ES Chapter 14: Air Quality [APP-072]** that sets out the two sources of air pollution from the Proposed Development is from traffic and dust.<br><br>The Proposed Development is not located within or near to an Air Quality Management Area (AQMA). Monitored concentrations in the vicinity of the Proposed Development show pollutant concentrations have been below the Air Quality Objectives (AQO) in 2023, the most recently available year of monitoring data.<br><br>Predicted construction traffic flows have been screened against the criteria within the Environmental Protection UK and Institute of Air Quality Management planning guidance criteria and fall below the screening criterion (500 LDV and/or 100 HDV ADDT – the point at which an impact in terms of air quality can occur), with average traffic flows of 116 LDV and 36 HDV AADT across the 24-month construction phase period. The effects of the decommissioning phase are likely to be similar to the construction phase. Operational traffic is significantly lower than both construction and decommissioning phases, it is not significant in terms of air quality.<br><br>With regards dust emissions, this is most likely during the construction and decommissioning phases. It will be controlled via air quality and |

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| | | dust mitigation measures detailed in Table 3.10 of **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089]** and on page 11 and 12 of **ES Appendix 4.2 Outline Decommissioning Plan [APP-090]**. Detailed versions of each plan building on the detail provided in the outline plans are secured by Requirement 7 (CEMP) and 19 (Decommissioning and Restoration Plan) of the **dDCO [APP-041].**<br><br>The Applicant can confirm the health of local residents during all stages of the Proposed Development have been considered in the **Health Impact Assessment [APP-183].** Mitigation strategies identified in the **Health Impact Assessment [APP-183]** have been reflected in **ES Appendix 4.1 Outline Construction and Environmental Management Plan oCEMP) [APP-089]**, **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]**, **ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [APP-092]** and **ES Appendix 13.2 Outline Construction Traffic Management Plan (oCTMP) [APP-129]**. Further details for each plan are secured by Requirements 7 (CEMP), Requirement 9 (OEMP) and Requirement 21 (Decommissioning and Restoration) of the **dDCO [APP-041]** that will build on the details provided in the outline plans.<br><br>**ES Appendix 4.3: Outline Fire Risk Management Plan [APP-091]** has provided outline fire risk management details how the project has been developed to address fire risk in several ways and contains key mitigation measures against the risk of fire ignition as well as propagation within the Battery Energy Storage System (BESS) site. Fire safety of BESS is governed by regulation and international standards |

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| | | out with the planning system. The focus of this report is on the location and design considerations as they are relevant for the planning application. Battery technology and associated understanding of fire risk is continually evolving within the industry. As such, this document sets out key principles and mitigation measures based on the current understanding of battery fire risk but does not include a detailed Fire Risk Management Plan that is secured by Requirement 10 of the **dDCO [APP-041]** and will build on details set out in the Outline Fire Risk Management Plan.<br><br>The Applicant notes the comments about site selection and consideration of alternatives. **The Design and Access Statement [APP-184]** explains the Scheme's design evolution including site location. **ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** provides more information regarding site selection. The location has been chosen for a number of reasons including connection agreement, proximity of grid connection, good access, screening provisions and offsets to sensitive receptors/ physical constraints can be achieved. The area of search was centred on the available grid capacity at the existing substation at the West Burton A Power Station site and extended to 15km to allow the best opportunity for an appropriate location to be identified. Three alternative sites have been considered in **ES Volume 1, Chapter 3 - Site Description, Site Selection and Iterative Design Process [APP-061**] of similar land parcel areas size. These alternative site locations were discounted for a range of reasons including flood risk, proximity to heritage assets and ecological designations, and landscape designations. |

## Table 4-10: RR-019 Sharon McDonald

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-019 | I object to the Sturton le Steeple solar installation for the following reasons:-<br><br>Devastation of the local farming economy<br><br>This project will devastate the lively hood of the 4 tenant farmers that have tended the land for many generations and are now being evicted to make way for this large solar project. This loss of employment will have wider consequences in the rural community as a whole. The land not only supports the farmers and their families but also their workers, the contractors, and the wider agricultural business. This will all be a loss to the area's economy with no other agricultural work to replace it.<br><br>No productive farm land should not be used for solar projects.<br><br>All Productive farm land of any "A" grade should be exempt from being used for the placement of large-scale solar projects. This land should remain for food production to help ensure food security in the United Kingdom. The land in this area is classed as good to moderate on the Regional Agricultural land classification maps, but all land quality varies within different area of the same field, so by targeting the areas of poorer quality soils within the fields can result in a lower graded land quality such as an A 3 and 4 thereby taking the whole filed out of the A 1 & 2 classification which would keep the field for agriculture and food production, as I suspect has happened in this case.<br><br>Food security. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• A: General opposition to the Proposed Development<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• F: Food Security<br>• H: General concern regarding impact on Wildlife<br>• K: General concern regarding the size and scale of the Proposed Development<br>• N: Economic Impact on the local farming community<br><br>The Applicant notes the comments about the validity of the land classification surveys. **ES Chapter 15: Land Use and Agriculture [APP-072]** reports on the condition of the land and is supported by **ES Appendix 15.1 Agricultural Land Classification Report [APP-131]**. The ALC is reported in the ES and has been carried out by qualified professionals under the ALC methodology (MAFF, 1988). It is also based on available public information including soil maps from *Soils and their use in Eastern England, 1984, Soil Survey of England and Wales Memoir* as well as intrusive investigations that include physical soil samples from |

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| | This project alone will take out almost 2000 acres of high yield farm land that has been used to grow crops for hundreds of years, helping to feed the nation. To remove this land from the food chain will add to a lack of food security for the country as a whole and when taken in conjunction with the loss of other farming land within a 10 mile radius of this project the accumulative effect is enormous and once gone will never be able to be used as arable land for food production again. Solar panel construction methods cause permeant damage to the land. When the ground is prepared for the racking systems the drainage within the fields are destroyed, the metal support structures are piled into the ground and secured with concrete, then wires are laid underground. These can never be removed thoroughly enough for food production to ever take place on that land again.<br><br>Increase in flood risk.<br><br>The preparation of the land for solar panel installation destroys drainage. The village of Sturton le steeple is already prone to regular flooding and this will significantly increase the amount of water running off the land and into the village, this will damage the road surface and will probably lead to houses in the village flooding<br><br>Accumulative effect on the environment and wild life<br><br>The large amount of infrastructure that is being proposed in the area. These being many large solar projects within a 10-mile radius, a large quarry, and changes to the West Burton power Station, will all have an effect on the environment and the wild life that live within it. Once the | over 800 boreholes within the Order Limits. No previous ALC reports are available for the site or adjacent surrounding areas.<br><br>The comments about damage to the land during construction are noted. The impact on agricultural land use as a result of the Proposed Development is fully assessed in **ES Chapter 15: Land Use and Agriculture [APP-072].** Soils, in this relatively dry part of the country, are resilient to being worked. There will be no significant damage to the land, either in terms of effects on land quality or on the soils. The equipment mostly involves only minimal disturbance to the land, and small areas of fixed equipment needing bases are all restorable on decommissioning.<br><br>**ES Appendix 15.2 Outline Soil Management Plan [APP-132]** sets out the key principles and considerations for the handling of soils for the Proposed Development. Requirement 11 Soil Management Plan (SMP) of the **dDCO [APP-041]** secures a Soil Management Plan that will build on the details provided in the outline SMP.<br><br>The Applicant notes the concerns regarding the location of solar panels in proximity to Keepers Cottage, a detached dwelling towards the east of the plot nearest Leverton Road. Sheet 5 of the **Site Layout Plan [APP-011]** shows panels will be located to the west of this dwelling set back behind a perimeter fence and the Solar PV layout concaved slight away to ensure the amenity of this property is safeguarded. The separation distance between:<br><br>• Perimeter fence of the Steeple DCO to the western boundary of Keepers Cottage is a 12.3 metres at its nearest point; |

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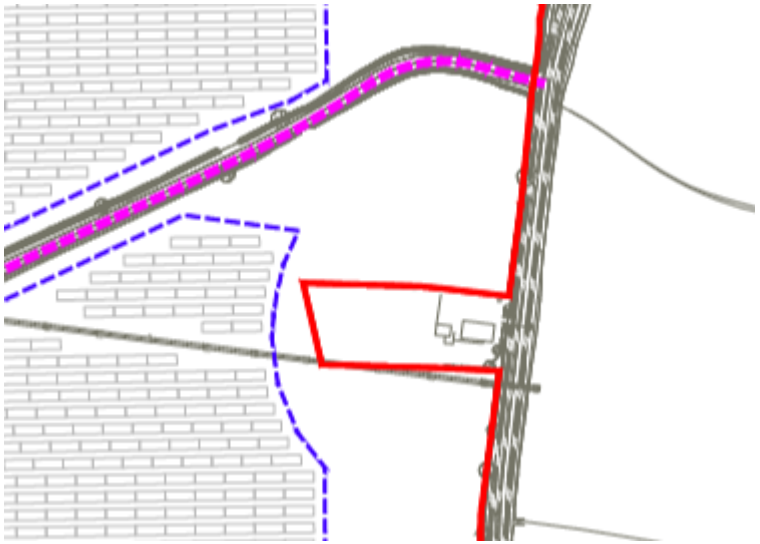
| | wild life has gone it will not come back, and surely all of that glass in one area will have an effect on the atmospheric temperature.<br><br>Proximity to our property boundary.<br><br>The plans that have been submitted for the placement of the solar panels in the field behind our property do not seem to be 20 metres from our border nor does it even look like they are the minimum 5 metres. They do seem to start approximately 1 metre from the rear boundary of our property. | • Solar PV panels from Steeple DCO and the western bound of Keepers Cottage is 17.5 metres at the nearest point; and<br><br>• Perimeter fence of the Steeple DCO and the western elevation of Keepers Cottage is 76.3 metres at the nearest point.<br><br>  <br><br>**ES Appendix 4.1 Outline Construction and Environmental Management Plan oCEMP) [APP-089]**, **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]**, **ES Appendix 4.4 Outline Operational Environmental Management Plan (oOEMP) [APP-092]** and **ES Appendix 13.2 Outline Construction Traffic Management Plan (oCTMP) [APP-129]** contain mitigation strategies to safeguard residential amenity during all phases of the Proposed Development. Final iterations of each plan are secured by Requirements 7 (CEMP), Requirement 9 (OEMP) and Requirement 21 (Decommissioning and |

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| | | Restoration) of the **dDCO [APP-041]** that will build on the details provided in the outline plans. |

## Table 4-11: RR-019 Nicola Wildgoose

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-019 | We have recently moved to the area for the countryside views that surrounds our little village. We were devastated to hear of the vast plans that are proposed in the vicinity. We not only feel that this is devastating aesthetically but also feel that the works will cause disruption on the roads and noise pollution to the community. We do understand that it is creating greener energy, however we feel that the vastness of the project is not fair to the community or the farming communities that surround us. We already have a quarry, a power station and an overhead power supply in our area, such plans to add to these will de value our properties and effectively reduce the saleability | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• A: General opposition to the Proposed Development<br>• D: Cumulative Effects<br>• K: General concern regarding the size and scale of the Proposed Development<br>• O: Impact on the local landscape |

## Table 4-12: RR-020 Ian John Lawman

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-020 | We have just moved to the Area unaware of the planning for Solar, we bought the property because of the countryside and the beautiful walks and better our children's lifestyle, which will now be taken away. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• O: Impact on the local landscape |

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| | | The Applicant acknowledges that the Proposed Development would result in some visual effects on the local public rights of way (PROW) network and on landscape character within the Site. All PROW routes would remain open throughout the life of the development and would be supplemented by new permissive paths. Offsetting measures and mitigation planting have been incorporated to minimise impacts on footpath users and to complement the existing vegetation. |

## Table 4-13: RR-022 Mr and Mrs Barlow

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-022 | The cumulative Impact of this and other projects in the area has not been given due consideration (Spatial, Temporal, Synergistic, Environmental, Social and Economic), we are aware of 21 projects within a 6km radius(NSIPS, NCC and BDC) which directly impact our village and daily life. We are struggling to actually engage and respond to all these projects given the sheer volume and technical nature of them e.g. the RES documentation suite exceed 8,000 pages. Over and above the cumulative impact and consultation fatigue we are experiencing we also have specific concerns on this project standalone. It completely surrounds the village of Sturton le Steeple, affecting every foot path, road and landscape. The developer has not given due consideration to the impact on our diverse and protected wildlife, habitats, landscape and heritage assets, using outdated information, incorrect baseline data, desk top studies rather than reality and so the outcomes of the EIA assessment is not robust and should not be relied | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• A: General opposition to the Proposed Development<br>• B: Consultation Fatigue<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• F: Food Security<br>• H: General concern regarding impact on Wildlife<br>• K: General concern regarding the size and scale of the Proposed Development<br>• L: Increased flood risk |

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| | upon. Flooding in this and the surrounding area is a regular and known occurrence and a concern to all authorities with all three villages affected by the project being subject to serious flooding many times recently, let alone the wider Trent Valley between Gainsborough and Newark. We urge the Planning Inspectorate to give due consideration to rejecting this project. More detailed information gave be submitted at the next stage of the process. Thankyou. | • O: Impact on the local landscape<br><br>The Environmental Statement (ES) includes a number of chapters, with **ES Chapter 6: Landscape and Visual Impact and Residential Amenity [APP-064]** addressing landscape, **ES Chapter 7: Ecology and Biodiversity [APP-065]** addressing wildlife and habitats, and **ES Chapter 9: Cultural Heritage [APP-067]** addressing heritage assets. ES Chapters 6, 7 and 9 are supported by appendices (**ES Appendix 6.1-6.6 [APP-095 to APP-102]** for ES Chapter 6, **ES Appendix 7.1 to 7.14 [APP-103 to APP-116]** for ES Chapter 7 and **ES Appendix 9.1 to 9.5 [APP-122 to APP-126]** for ES Chapter 9). Figures are also provided in support of ES Chapter 6 (**ES Figure 6.1 to 6.9 [APP-147 to APP-160]**) and ES Chapter 9 (**ES Figures 9.1 to 9.8 [APP-165 to APP-172]**). The supporting Appendices and figures provide further information to how the assessments and conclusions of each chapter have been reached.<br><br>The Applicant notes the comment about the use of desk top surveys as part of the environmental and ecological assessment works. The ecological survey reports include a 'desk study' element, in line with industry guidance for undertaking and Ecological Impact Assessment (such as CIEEM guidance for undertaking EcIA that is the industry standard for ecological assessment). The extend of study area has been informed by published guidance, professional judgement, and the scoping and consultation responses from the Planning Inspectorate and other stakeholders such as Natural England, the Environment Agency, Historic England, Nottinghamshire County Council and Bassetlaw District Council. |

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| | | This information is used to provide field data and historical context to the assessments. This is supported by additional surveys and figures. With regards ES Chapter 7 this includes designated sites, habitat reports, various bird reports, bats, badger, otter and water vole, great crested newt, aquatic invertebrates, biodiversity net gain, skylark mitigation strategy and an outline landscape and environmental management plan. These surveys are recent have been undertaken since 2023.<br><br>In relation to specific concerns about brown hares, the potential for impacts on the species and the need to survey specifically for brown hare was considered at the scoping stage. The need to undertake specific survey for the species was not identified. This is because measures to ensure the long-term presence of brown hares were built into the project design and simple measures such as mammal gaps in fences would permit continued movement around the site, which would avoid the impact of long-term displacement. Therefore, there was no likelihood of a significant effect on the species arising, thus allowing targeted surveys to be scoped out.<br><br>Requirement 6 (LEMP) of the **dDCO [APP-041]** secures additional Landscape and Ecological Management Plan information building upon the outline plan details. This includes safeguarding habitat during all stages of development, additional tree and hedgerow planting, wildflowers, community orchard, bat roosts and bird boxes, and at least 10% biodiversity net gain. |

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| | | Requirement 7 (CEMP) of the **dDCO [APP-041]** secures additional Construction Environmental Management Plan (CEMP) details building on the details provided in the **Outline Construction Environmental Management Plan (oCEMP) [APP-089]**. This includes details of measures to be adopted including pre-construction surveys to protect species defined as a European Protected Species in regulation 41 (European protected species of animals) and 46 (European protected species of plants) of the Conservation of Habitats and Species Regulations 2017(a) or any species to which Part I (wildlife) and Schedule 5 (animals which are protected) of the Wildlife and Countryside Act 1981(b) applies; details of the method of species protection during the construction stage of the authorised development; environmental monitoring plan; and a habitats constraints plan.<br><br>Requirement 19 (Decommissioning and Restoration) secures additional Decommissioning and Restoration details building on the details provided in the **Outline Decommissioning Plan (oDP) [APP-090]**. This includes details of measures to be adopted including pre-decommissioning surveys to protect species defined as a European Protected Species in regulation 41 (European protected species of animals) and 46 (European protected species of plants) of the Conservation of Habitats and Species Regulations 2017or any species to which Part I (wildlife) and Schedule 5 (animals which are protected) of the Wildlife and Countryside Act 1981 applies; and details of the method of species protection during the decommissioning stage of the authorised development. |

## Table 4-14: RR-026 Lynn Clapperton

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-026 | There are many projects already happening very close to the village of Sturton Le Steeple.<br><br>These include The STEP nuclear project.<br><br>The upgrade of the National grid<br><br>A Quarry that has just started<br><br>An already granted Solar Farm<br><br>The proposed solar panels will cover most of the farms around us and many of our places to farm, walk, enjoy and see nature will be industrialised if this goes ahead.<br><br>We are a rural community. We have supported and lived with West Burton Power Station and largely support the STEP project for jobs and the economic value to the area but covering our land in solar as well is going too far.<br><br>This project doesn't take into account the mental well being of the community. This has caused and is causing a lot of stress on our community with a sense that no one is listening and that various projects are not taking into account other projects. There is a cumulative impact.<br><br>We are an important Christian Heritage site on Bassetlaw's Pilgrim Tourist Trails with (Redacted) all coming from here. We have regular tourists visiting and have a memorial funded by Rural England in | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• D: Cumulative Effects<br><br>• O: Impact on the local landscape<br><br>The Applicant acknowledges that the Proposed Development would result in some visual effects on the local public rights of way (PROW) network and on landscape character within the Site. All PROW routes would remain open throughout the life of the development and would be supplemented by new permissive paths. Offsetting measures and mitigation planting have been incorporated to minimise impacts on footpath users and to complement the existing vegetation.<br><br>The Applicant has considered impacts on mental health, both direct and indirect, as a result of the Proposed Development within each of the six determinants of health through the WHIASU approach. See Table 7.1 and Table 7.2 in Section 7 of the **Health Impact Assessment [APP-183]**: Impacts of the Proposed Development for further information regarding the potential impacts on relevant Target Groups. Relevant information from wider application documentation is used to inform the assessment and referenced as necessary in Section 7 of the **Health Impact Assessment [APP-183]**.<br><br>The Applicant notes concerns about the impact of the Proposed Development on heritage assets within the surrounding area. The |

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| | association with Bassetlaw District Council and Pilgrim and Prophets Tours. Fields of Solar will detract from the historical landscape that includes the church that people are visiting. | heritage assessment considers the potential effects of the development on cultural and historical assets in the area, including the Church of St Peter and St John, scheduled monuments, and other heritage features.<br><br>The assessment has identified no direct impacts on designated heritage assets. However, indirect effects, such as changes to the setting of nearby heritage sites, will be carefully managed.<br><br>To preserve local heritage, it is proposed that there will be:<br>• Buffer zones to protect the visual setting of heritage assets.<br>• Using appropriate materials and layouts to minimise intrusion on historic landscapes.<br>• Ongoing consultation with heritage experts and stakeholders to refine mitigation strategies. |

## Table 4-15: RR-028 Robert Jenrick MP

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-028 | Dear Sir,<br><br>I write as the Member of Parliament for Newark to object to the proposed Steeple Renewables Solar Farm Development Consent Order.<br><br>I want to make clear at the outset that I am not opposed to solar power in principle. I have said publicly that Members of Parliament should support the expansion of rooftop and brownfield solar and work constructively to mitigate the worst impacts of large schemes. However, the scale and siting of the proposed Steeple Renewables Solar Farm are wholly unacceptable for Newark and the Trent Valley and would cause harm on a scale that far outweighs any claimed benefits.<br><br>Since the outset of the proposals, I have met with constituents across the affected area and studied the details of the application. In all of my surveys, constituency visits and public meetings, I have found that the overwhelming majority of residents - and in fact almost everyone I have spoken to - are opposed to this proposal. They are deeply concerned that their villages, farmland, and way of life will be overwhelmed by what is effectively the construction of another industrial power station in the heart of rural Nottinghamshire.<br><br>The proposal is vast. At around 400-600 MW of solar generation and including a battery energy storage system of up to 200 MW, it would | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• A: General opposition to the Proposed Development<br>• B: Consultation Fatigue<br>• C: BESS Safety and fire risk<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• F: Food Security<br>• G: Solar should be placed on rooftops or brownfield land<br>• H: General concern regarding impact on Wildlife<br>• K: General concern regarding the size and scale of the Proposed Development<br>• L: Increased flood risk<br><br>The Applicant has considered those factors associated with residents' safety as a result of the construction phase of the Proposed Development within a number of the six overarching determinants of health through the WHIASU approach, including 'Lifestyles', 'Social and community influences on health', and 'Living / environmental conditions affecting health'. See Table 7.1 in Section 7 of the **Health** |

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| | cover in the region of 1,500 hectares around Sturton-le-Steeple and West Burton. Villages including Sturton-le-Steeple, North Leverton, Rampton, Cottam and Laneham lie immediately adjacent to the site and would be heavily affected. When viewed in isolation this would already be an unprecedented scheme; when considered alongside other nationally significant infrastructure projects in the locality, such as One Earth and Great North Road, the cumulative impact on Newark is intolerable.<br><br>The area sits beside the former West Burton power station. That site is scheduled for redevelopment including the STEP Fusion project. This has been broadly welcomed by residents, albeit it will carry significant disruption from construction traffic and an unknown impact on the community, depending on the final use of the whole site. Nonetheless, many appreciate the need to develop the site and to play a part in future energy generation. However, the cumulative impact of this major, national project alongside large-scale solar is both excessive and unfair.<br><br>The land in question is among the most productive agricultural land in the country. National Policy Statement EN-3 is explicit that where solar farms are proposed on agricultural land, poorer quality land should be preferred, and the use of Best and Most Versatile (BMV) land - Grades 1, 2, and 3a - should be avoided wherever possible. At this scale, the loss of BMV land is inevitable, undermining food security at a time when the importance of protecting domestic food production could not be clearer. | **Impact Assessment (HIA) [APP-182]** for further information regarding the potential impacts on safety of relevant Target Groups. Relevant information from wider application documentation is used to inform the assessment and referenced as necessary in Section 7 of the HIA. Potential impacts on safety linked to risk of fire, flooding, traffic changes and changes to water quality have been considered. Management plans will be in place to ensure risk to safety is minimised. Overall impact on safety is neutral.<br><br>The Proposed Development will be accessed using the adopted highway, and the routes that construction vehicles will be advised to use are shown in **ES Chapter 13: Transport and Access [APP-071]** and described in **ES Appendix 13.2, Outline Construction Traffic Management Plan (oCTMP)** [**APP-128**]. The advised routes avoid roads with weight limit restrictions and avoid roads through residential areas, where possible. |

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| | Flooding and drainage are another serious concern. Parts of the proposed site lie close to the Trent's floodplain, an area already vulnerable to inundation. Covering so much land with panels, tracks and substations will inevitably alter drainage patterns, increase surface water run-off, and reduce floodplain capacity. There is a real risk that neighbouring villages would face worsened flooding as a result of this scheme, an outcome that would be wholly unacceptable given recent national focus on flood resilience.<br><br>There are further serious concerns about construction and safety. EN-3 acknowledges that access and traffic during the building of such large schemes can be a significant consideration in rural areas. The local road network, particularly around Sturton-le-Steeple, North Leverton and Rampton, is not suited to prolonged volumes of heavy goods vehicles. Residents are rightly worried about disruption and safety risks. Even if the scheme were acceptable in other respects, robust caps, routing restrictions and independent monitoring would be essential.<br><br>The proposal also includes a very large battery energy storage system. Several serious fire incidents involving lithium-ion battery storage systems have occurred in the UK and internationally, and have shown how real the risks of fire, explosion and toxic plume scenarios can be, and how difficult they are to suppress once ignited. Constituents have pressed me on this repeatedly.<br><br>Above all, there is a democratic deficit in how this project is being advanced. Residents across Sturton-le-Steeple, North Leverton, Rampton, Cottam and Laneham feel ignored and powerless as decisions | |

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| | about the future of their villages are taken over their heads. They fear, with justification, that they will be forced to live for a generation inside what is essentially an industrial complex. Parish councils across the area have registered strong objections, and local press reports confirm near-universal opposition to the proposal. That reflects what I have consistently heard on the ground.<br><br>Government policy is clear that solar development should prioritise rooftops, brownfield sites, contaminated land and other industrial surfaces. Newark and the wider region have significant warehouse and logistics space, along with large commercial roofs, that could and should be exploited before sacrificing prime farmland. I have consistently made that case locally, and my constituents are right to expect the same logic to apply here.<br><br>For all of these reasons, I urge the Examining Authority to accept this representation into the Examination and to give very substantial weight to the loss of BMV agricultural land, the cumulative impacts with other energy schemes, the flood risk implications, the unacceptable construction impacts, and the real safety risks posed by battery storage.<br><br>On that basis, I ask you to recommend refusal. If, notwithstanding these objections, you are minded to recommend approval, then the only way to protect my constituents would be through stringent and binding requirements. These would need to include independently verified soil surveys to minimise BMV loss; enforceable construction traffic caps and routing conditions; strong protections against glint, glare and loss of amenity for residents; comprehensive BESS safety and emergency | |

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| | response plans; robust decommissioning and soil restoration obligations; and a meaningful community benefit package proportionate to the scale of the intrusion.<br><br>I would be grateful if you could keep me informed of all remaining Examination milestones and any hearings where constituency evidence may assist.<br><br>Yours sincerely,<br><br>Rt Hon Robert Jenrick MP Member of Parliament for Newark | |

## Table 4-16: RR-031 Simon Andrew Frankish

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-031 | Or property is on the boundary of the proposed development and stretches out over all the surrounding fields over every aspect of land to the rear of our property. I also understand that it is proposed these fields will be the main access point foe the majority of the development to the west of Sturton le Steeple. I have on a number of occasions asked the developers why our property which is a grade 2 listed building has not been recorded in the consultation documents. I copy below the trail of emails from them and from the local conservation manager. It feel totally unacceptable that for a resident that is not allowed solar panel on their property or in their garden because of the historical nature of the property that 80,000 of them can be positioned all around us. I would appreciate your comments | It is understood that these comments relate to the former range of agricultural buildings (comprising [redacted] that the Local Authority have previously identified to be Curtilage Listed in association with Grade II Listed [redacted], under Section 1(5) of the 1990 Act. This results from the date of the former agricultural buildings and their historic associative connection with [redacted] (a former farmhouse off [redacted]). This legal classification does not, however, result in the buildings being statutorily designated in their own right, nor of being of equal significance to [redacted] Furthermore, when considering potential impacts on the Curtilage Listed structures, the consideration should be whether such change (be that physical or via a change in 'setting') alters the contribution which they make to the designation as a whole. In this context, the rationale behind the designation is the architectural and historic interest of the physical fabric of Crow Tree Farm.<br><br>Potential impacts to the significance of the Grade II Listed [redacted] Farm have been considered as part of the assessment – see Appendix 1 of **ES Appendix 9.1 Cultural Heritage Baseline [APP-122]**. On review it was considered that the significance of the asset would not be harmed by the Proposed Development, so it was not taken forward for further assessment, in line with Historic England guidance, as outlined in the baseline's methodology. |

## Table 4-17: RR-034 Bartle Brothers

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-034 | Cumulative impact on Economy, Environment & Society- Firstly, the RES project will result in the loss of approximately 250 acres of out 500 acres tenancy farm business for our family. The tenancy also includes housing for 5 families who would also become homeless should the family business cease due to loss of land to this project.<br><br>The farm is arable and beef stock, using part of the land for grazing and the remaining to grow crops and grass for winter silage feed for the cattle. The crops also provide straw for winter bedding! Not only for our cattle, but we also provide straw and hay bales to the Welsh and Scottish sheep farming community, and to numerous equine establishments in the surrounding area to here.<br><br>Social Displacement - As you can see from above, this project would wipe out our livelihood!<br><br>Environmental Effects - We have numerus videos of wildlife in these fields which are proposed for the solar project - Rabbits, Hares, Roe Deer, Badgers (with many established sets for 40 years, in the very fields which are proposed for solar!!), Pheasants, Partridges, Birds of prey, red kites, Buzzards, Lapwings and many, many more. The area of approx. 160 acres proposed for 'Biodiversity' is seen as a 'tick box' exercise, and NOT in the best interests of aforementioned wildlife who are settled in the current habitats. Nobody involved in the proposed project can clarify what form this would take. This is the same as their statement of | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• A: General opposition to the Proposed Development<br>• B: Consultation Fatigue<br>• C: BESS Safety and fire risk<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• F: Food Security<br>• H: General concern regarding impact on Wildlife<br>• K: General concern regarding the size and scale of the Proposed Development<br>• L: Increased flood risk<br>• N: Economic Impact on the local farming community<br>• O: Impact on the local landscape<br><br>The Applicant acknowledges that the Proposed Development would result in some visual effects on the local public rights of way (PROW) network and on landscape character within the Site. All PROW routes would remain open throughout the life of the development and would be supplemented by new permissive paths. Offsetting measures and |

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| | 'recycling used panels'; when questioned about this, RES do not have an answer - because the is no such thing!<br><br>Temporal Effects - Wood Lane solar which has already been approved is right next door to the site of this proposal.<br><br>Synergistic Effects - We are in a high concentration of NSIP's. The quarry, the Wood Lane solar farm, plus the National Grid pylon upgrades going through the centre of the village, and the Step fusion project at West Burton once the power station is decommissioned. There is still the gas fired power station at West Burton too and proposed battery storage, plus the proposed Tillbridge lane and West Burton solar farms all feeding into the Grid at West Burton. The RES project is vast and is one step too far for the local area.<br><br>Community & Consultation fatigue - The constant environmental studies, form reading and completing for projects is time consuming and overwhelming. Several years ago, this was all carried out for a proposed wind farm which was thrown out in the end. Constant fear of the next project rail roading your business and threatening your livelihood and home is highly concerning. The stress is significant.<br><br>Spatial Effects - Loss of high grade 3A agricultural land (confirmed by Agronomist) This land should not be taken out of agricultural production when solar can be placed on roofs and carparks.<br><br>Construction impact - There are no main roads/highways in place to access any of the fields proposed on our land! | mitigation planting have been incorporated to minimise impacts on footpath users and to complement the existing vegetation.<br><br>The Applicant has considered impacts on mental health, both direct and indirect, as a result of the Proposed Development within each of the six determinants of health through the WHIASU approach. See Table 7.1 and Table 7.2 in Section 7 of the **Health Impact Assessment [APP-183]**. Impacts of the Proposed Development for further information regarding the potential impacts on relevant Target Groups. Relevant information from wider application documentation is used to inform the assessment and referenced as necessary in Section 7 of the **Health Impact Assessment [APP-183]**.<br><br>The Applicant acknowledges that the Proposed Development would generate an impact on Economy, Environment & Society and in particular may impact on local farming businesses. The potential effects in relation to Farm Businesses is considered in **ES Chapter 15: Land Use and Agriculture [APP-072B]** and wider Socio-Economic impacts are considered within **ES Chapter 10: Socioeconomics [APP-068]**.<br><br>The Applicant notes the concerns regarding access. The proposals include a restricted construction routing from the Strategic Road Network (SRN) to the site from the north, agreed with relevant highway authorities as set out in **ES Chapter 13: Transport and Access [APP-071]**. Traffic flows have been considered in **ES Chapter 13: Transport and Access [APP-071]**, **ES Appendix 13.2: Outline Construction Traffic Management Plan (oCTMP)** [**APP-089]** and the **ES Appendix 13.1 Transport Assessment [APP-128]**. Vehicles will route from the |

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| | Cumulative Effect of Multiple Developments - Tennant farmers have farmed the proposed site for many years under the Osberton Estate ownership. The land in Sturton le Steeple was then sold by the Osberton Estate to the new owner (Redacted) who does not live locally and who would not place a solar farm on land local to his own countryside and abode! He bought the area of Sturton Le Steeple due to his business interests in Quarrying, and he is now using the rest of the village as his 'cash cow'. The RES project will mean the village is 'penned in', the stunning views will be heavily blighted, mental health will be highly impacted for many many people including walking groups, bird watchers and those who use the many bridleways. | SRN and main routes, to/from two main accesses onto Station Road and Gainsborough Road. From the main two access points internal haul roads will be used to access the wider **Order Limits [APP-009]**.<br><br>**ES Chapter 13: Transport and Access [APP-071]** indicate that accidents and safety in relation to transport has been assessed as negligible based on the low number of existing accidents recorded, including no fatal accidents in 5 years. The changes in traffic flows are minor and will be managed, which implies there will be negligible increased risk of accidents on Station Road or Gainsborough Road as a result of the Proposed Development. Nevertheless, **ES Appendix 13.2 Outline Construction Traffic Management Plan (oCTMP) [APP-129]** will be secured to manage any potential further risk. Further details will be picked up in Requirement 8 of the **dDCO [APP-041]** building on the oCTMP details. This includes traffic movements including deliveries vehicles and staff construction/ delivery vehicles; traffic management of the adjoining public highway; and a condition survey for any road which will be affected by undertaking that phase of the authorised development and a further condition survey following that phase of the construction works. In the event that any defects are identified in that condition survey that are directly attributable to that phase of the construction works of the authorised development, details of how those defects are to be remediated by the undertaker. |

## Table 4-18: 036 Peter Warburton

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-036 | Point 1. There are three more major projects, which will impact on the quality of life within a mile and a half of the village. One in isolation may be reasonable, but four is unacceptable. (a) A huge quarry, for aggregates, already being developed. (b) The West Burton prototype nuclear fusion power plant....already has government approval. (c) A line of high voltage pylons proposed by National Grid within half a mile of the village western boundary. Point 2. The land within a mile of the village is the best, most productive agricultural land. Lower grade, poor farming land is available closer to the river Trent, which would be less offensive. It is well away from habitation, would be of limited visual impact, scarcely affect wildlife, and not be vulnerable to flooding. Point 3. I am the joint owner of a small field in Area D, in which we have planted trees, under the guidance of Sherwood Forest Trust. The backers of RES have tried unsuccessfully to buy this from us. If the Development Consent Order is granted, the developers will be given authority to compulsory purchase this field, as well as other plots. This is a sinister and unacceptable situation. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• H: General concern regarding impact on Wildlife<br>• L: Increased flood risk<br>The Applicant notes the comments about site selection and consideration of alternatives. The **Design and Access Statement [APP-184]** explains the Proposed Development's design evolution including site location. **ES Chapter 3: Site Description, Site Selection and Iterative Design Process [APP-061]** provides more information regarding site selection. The location has been chosen for a number of reasons including connection agreement, proximity of grid connection, good access, screening provisions and offsets to sensitive receptors/ physical constraints can be achieved. The area of search was centred on the available grid capacity at the existing substation at the West Burton A Power Station site and extended to 15km to allow the best opportunity for an appropriate location to be identified. Three alternative sites have been considered in **ES Chapter 3 - Site Description, Site Selection and Iterative Design Process [APP-061]** of similar land parcel areas size. These alternative site locations were discounted for a range of reasons including flood risk, proximity to |

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| | | heritage assets and ecological designations, and landscape designations.<br><br>It has been separately confirmed to the author of this response that no plot of land they own is included within the Order Limits of the Proposed Development and will not, therefore, be the subject of any CA powers. |

## Table 4-19: RR-037 Yvonne Hodgson

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-037 | The village is being bombarded with a plethora of projects which is excessive for its size. The solar project will change the nature of the village which has traditionally been a farming area: solar panels will reduce the amount of land available for food production, destroying livelihoods of families who have farmed the area for generations and meaning increased reliance on imported food to ensure our country's food security. The local impact of the project will be adverse effects on the local economy (as farmers move away), the negative visual aspect and "feel" of the village, the level of traffic, the threat to our wildlife and the feeling of many residents that this is just one project too many. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• H: General concern regarding impact on Wildlife<br>• L: Increased flood risk<br>• N: Economic Impact on the local farming community |

## Table 4-20: RR-038 Geoffrey Miller

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-038 | Inappropriate use of good arable land, which impacts on British food security Large scale solar installations will destroy the rural lifestyle. The West Burton CCGT power station and gravel quarry are sufficient industrial impact on the countryside Increased traffic in the village from the construction of the proposed massive solar installations will reduce the quality of life of village residents and negatively impact the condition of the roads. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• D: Cumulative Effects<br>• E: Use of Best and Most Versatile Land<br>• J: General concern regarding the impact of the proposed Development on traffic<br>The Applicant acknowledges concern about the potential impact of the Proposed Development on local roads. Roads in the vicinity of the site |

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| | | will be subject to a Condition Survey pre and post construction. This survey will ensure that the roads impacted by vehicles during the construction period will be returned to the pre-construction condition post-construction, in liaison with the local highway authority. |

## Table 4-21: RR-039 Emily C Byatt

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-039 | My family and I moved to Sturton-le-Steeple 7yrs ago because we love the beautiful village location and surrounding countryside. We enjoy frequent bike rides and walking our dog in nature and visiting the sites in our parish and neighbouring villages all year round. This is an integral part of our healthy lifestyle and feeling connected to our local community. We enjoy spotting wildlife and taking in the green and blue landscapes.<br><br>Since we first heard about RES's intention to surround the village with an enormous solar farm, I have felt anxious and powerless to stop it. I am in favour of renewable energy however, the costs of this particular project are far too high. It is entirely unreasonable to keep bombarding us with industrial projects. This has been made worse by the fact that each is considered in its own right so we have to go through multiple consultation processes.<br><br>This project has caused me and those around me to fear for the future, feel powerless to be heard and stressed about how this will negatively impact our quality of life and our health. The health impacts of this | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• B: Consultation fatigue<br>• D: Cumulative Effects<br>• F: Food Security<br>• H: General concern regarding impact on Wildlife<br>• N: Economic Impact on the local farming community<br>• O: Impact on the local landscape<br><br>The Applicant has considered impacts on mental health, both direct and indirect, as a result of the Proposed Development within each of the six determinants of health through the WHIASU approach. See Table 7.1 and Table 7.2 in Section 7 of the **Health Impact Assessment [APP-183]**: Impacts of the Proposed Development for further information regarding the potential impacts on relevant Target Groups. Relevant information from wider application documentation is used to inform the assessment |

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| | project have not been adequately considered and I do not believe the community has been appropriately informed of these risks.<br><br>I work within healthcare treating people with mental health and chronic pain conditions. Research evidences that being able to see and spend time in nature is good for our physical and mental wellbeing. I love to take my family out for bike rides and walks to see wildlife and visit the local sites. We particularly enjoy going to Clarborough nature reserve, North Leverton Windmill and Littleborough.<br><br>We need the fields for farming. Local farmers yield produce for multiple types of food and are key to the food supply chain. I worry about the long term impact of forcing these farmers out of business. | and referenced as necessary in Section 7 of the **Health Impact Assessment [APP-183]**. |

## Table 4-22: RR-041 Barry Haywood

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-041 | The development is too large and will swamp the tiny village of Sturton. It is also being proposed to be built on prime farmland which is sacrilege. It will obviously be a huge eyesore! | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• E: Use of Best and Most Versatile Land<br>• K: General concern regarding the size and scale of the Proposed Development<br>• O: Impact on the local landscape |

## Table 4-23: RR-042 Robert Joseph Flemming

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-042 | My first comment has to be about the lack of time allowed for any member of the public to comment on a NSIP and certainly not on a project that will affect myself and my family over the next four decades. To give a few weeks' notice to objectors to make their comments known, slap bang in the middle of the summer holidays when many will be away for several weeks and in the middle of the harvest season (as this is a rural, agricultural area) is hardly fair or democratic.<br><br>Cumulative effect My major concern is the cumulative effect of this project and the many others that are proposed or proceeding within a 3 km radius of Sturton le Steeple church. There are 12 projects either proposed, approved or operational within this radius, another 12 within a 6 km radius and a further 5 large scale developments within 15 kms. The list of industrial projects grow weekly and it would appear that the Trent valley will eventually disappear under a sea of solar arrays, BESS containers, quarries, gas fired generating stations and fusion energy projects. Given that house prices near solar farms fall by a minimum of 5%, it is hardly a surprise that we have a record number of homes for sale in the district; the largest I have seen in over 36 years of living in the area.<br><br>Farming and Ford Security Sturton le Steeple has been a farming community for at least two millennium, with an history reaching back to feeding the Roman armies fighting on the continent. This year the crop in the field alongside my home was wheat, last year oilseed rape. Britian | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br><br>• B: Consultation Fatigue<br>• D: Cumulative Effects<br>• F: Food Security<br>• H: General concern regarding impact on wildlife<br>• J: General Concern regarding the impact of the Proposed Development on traffic<br>• M: Increased flood risk<br>• N: Economic Impact on the local farming community<br>• O: Impact on the local landscape<br><br>The Applicant acknowledges that there have been a range of views expressed with some in general opposition to the Proposed Development. The extent of representations received, and their nature is set out in full in the **Consultation Report [APP-047]**.<br><br>With regard to fencing, potential impacts to the movement of animals have been considered in the scheme design. Appropriately placed mammal gaps will be created in the fencing to allow species such as badgers, brown hare, and hedgehogs to access the grasslands |

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| | imports more of these two products year on year and in 2024 imported 2.8 million tonnes of wheat, a new record. Imports of oil seed rape is expected to reach 875,000 tonnes while UK production fell to a 41-year low last year with further falls expected this year. The RES proposal will take 1,700 acres of prime agricultural land out of production for 40 years with no indication of what the quality of the land will be in 2065.<br><br>Agricultural Job losses Most of the farms in the immediate area of the village are managed by tenant farmers. Despite the developer's claims of employment opportunities for those who lose their livelihoods, this is a nonsense. When the West Burton 'B' CCGT plant was under construction, only a handful of the 1,000 jobs generated went to local people. Not only will our farmers lose their livelihoods, there will be no future farming jobs for their children nor for the companies who support the local agricultural industry. A way of life destroyed for an inefficient method of producing electricity.<br><br>Road Traffic The road from North Leverton through the village to Bole corner on the A620 is a single unclassified road running in a north-south direction and the only road with a footpath alongside it. There is only one junction, where Gainsborough Road meets Wheatley Road at a T junction. Every year there are a number of accidents at this junction caused by traffic entering the village from the Gainsborough Road who fail to stop in time and run into the bus stop or crash into the neighbouring gardens. This is the junction where RES propose that a proportion of the HGVs bringing panels and building materials into the village envelope turn right into Wheatley Road for the short journey to their storage facility. This junction was the one identified by the | throughout the array areas. The locations of the mammal gaps in the fences will be determined in liaison with an ecologist.<br><br>For bats, it was found that higher levels of bat activity were recorded along the streams, next to small parcels of woodland, and at hedgerow intersections (refer to **ES Appendix 7.7: Bat report [APP-109]**). The woodlands and streams will be wholly retained in situ as part of the proposed development, and 98.5% of existing hedgerows will be retained and managed for biodiversity, with new hedgerows also planted – the proposed development will result in an overall increase of 15 km of hedgerows across the area. This means that the habitats that are most important to bats will be retained and enhanced. These habitats are also used by blackbirds for foraging and nesting. Research by the RSPB and Cambridge University shows that solar farms do not cause a decrease in the abundance of blackbirds and other thrushes (refer to the publication in Bird Study– 2025, Volume 72, Issue 3 pages 217-222).<br><br>An assessment of how the effects from neighbouring developments may cumulate with the proposed development has been assessed with regards to ecology in section 7.11 of **ES Chapter 7: Ecology and Biodiversity [APP-065]**.<br><br>The proposals include a restricted construction routing from the Strategic Road Network (SRN) to the site from the north, agreed with relevant highway authorities as set out in **ES Chapter 13: Transport and Access [APP-071]**. Traffic flows have been considered in **ES Chapter 13: Transport and Access [APP-071]**, **ES Appendix 13.2:** |

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| | Community Speed Watch team as recording the highest number of vehicles exceeding the posted speed limited by at least 15 miles per hour. There is a huge unused railway siding on the West Burton site where these HGVs could be unloaded.<br><br>At present, road traffic from Sturton Quarry is limited to 96 HGV vehicle movements each way but it is anticipated these numbers will increase when gravel begins to be abstracted from the site. However, it is proposed to begin direct sales of 10,000 tonnes per annum to the public that will allow small trucks and lorries to turn left out of the quarry and drive directly south through the village. When the quarry was approved by the planning authorities in the early 2000s, one of the conditions imposed was that the road layout out of the quarry onto Gainsborough Road prevented quarry traffic other than cars turning left. When the junction was built, this condition was conveniently ignored by the quarry company and no action was taken by the County Council to enforce it. Village residents have absolutely no confidence in the authorities enforcing any regulations passed to alleviate any road nuisance to local residents<br><br>At present, this road is closed for 8 days for patching the sides of the road that have collapsed due to heavy vehicles, but not to the potholes in the rest of the roads. This means a 10-mile diversion for villagers wanting to travel south or working in Retford, some 6 miles away. This is the second week-long closure this year and a third is planned before Christmas. The diversion route is on single track country lanes east of the village, and where two cars meet, one has to pull onto the grass verge for the other to pass. It is almost impossible for HGVs and service | **Outline Construction Traffic Management Plan (oCTMP)** [**APP-089**] and the **ES Appendix 13.1 Transport Assessment [APP-128]**. Vehicles will route from the SRN and main routes, to/from two main accesses onto Station Road and Gainsborough Road (and will not go as far as travelling north/south along Leverton Road).<br><br>**ES Chapter 13: Transport and Access [APP-071]** indicate that accidents and safety in relation to transport has been assessed as negligible based on the low number of existing accidents recorded, including no fatal accidents in 5 years. The changes in traffic flows are minor and will be managed, which implies there will be negligible increased risk of accidents on Gainsborough Road as a result of the Proposed Development. Nevertheless, **ES Appendix 13.2 Outline Construction Traffic Management Plan (oCTMP) [APP-129]** will be secured to manage any potential further risk. Further details will be picked up in Requirement 8 of the **dDCO [APP-041]** building on the oCTMP details. This includes traffic movements including deliveries vehicles and staff construction/ delivery vehicles; traffic management of the adjoining public highway; and a condition survey for any road which will be affected by undertaking that phase of the authorised development and a further condition survey following that phase of the construction works. In the event that any defects are identified in that condition survey that are directly attributable to that phase of the construction works of the authorised development, details of how those defects are to be remediated by the undertaker.<br><br>With regard to noise, Chapter 6.7 of the **Planning Statement [APP-182]** sets out **ES Chapter 11: Noise [APP-069]** has assessed noise and |

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| | buses to pass each other but fortunately, the ground is extremely hard at present due to the prolonged drought. If the ground were wet due to heavy rain, the grass verges would be destroyed and chaos would ensue. There are no footpaths on these ancient lanes that were used by King Harold and King William in 1066; the only difference today is a thin layer of tarmac on hard core. Notts CC is totally indifferent to the condition of our roads and nothing will change in the future.<br><br>If the RES scheme is approved, it is to be expected that the number of large agricultural vehicles traversing the village will decrease significantly. However, some sections of road are extremely narrow, to the extent that large vehicle will be forced to mount the pavement to get by. It is essential that all RES HGVs are routed via the Bole roundabout before entering the village but who will monitor this requirement? Certainly not the authorities nor the Police!<br><br>Biodiversity and Wildlife I am extremely concerned about the project's potential impact on local wildlife and habitats, including the effects of fencing on wildlife movement. Fox and hedgehog sightings have decreased considerably recently; bats and many common bird species including black birds and sparrows have ceased to inhabit or visit our garden. I cannot understand how RES can claim the project would achieve a significant biodiversity net gain. How fencing off 1,700 acres of farmland will affect local wildlife and habitats or the impact of fencing on wildlife movement is not examined. Wildlife is being displaced presently by the Power Station demolition work and explosions plus the | vibration impacts of the Proposed Development through a combination of consultation, background noise survey and computer modelling.<br><br>The noise assessments consider operational noise as well as noise and vibration from construction activities and construction traffic on noise sensitive receptors ('NSR').<br><br>Background noise monitoring was carried out at a large number of locations representing nearest sensitive existing receptors surrounding potential development areas.<br><br>Noise emissions from plant within the Proposed Development including solar PV arrays, energy storage and electrical substations have been predicted at the nearest NSRs.<br><br>The local planning authority has been consulted on and agreed to the appropriateness of methodology adopted to assess operational noise; a reflection of industry best practice in such circumstances where existing background levels surrounding a development are low.<br><br>In such instances BS 4142 contains a clause that alternative guidance WHO/BS 8233 and IEMA guidance should be considered and used to inform the assessment.<br><br>When assessed against the criteria, noise emissions during operation do not result in a significant impact at any NSR and no further mitigation measures are required.<br><br>Likely change in noise levels due to the contribution of noise emissions from the Proposed Development at each NSR during operation has been considered via a further assessment. When the predicted noise |

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| | development of the quarry site and its access road. Further disturbance will result from the RES proposals and the threat to any remaining fields by the digging of trenches to accommodate cables carrying power from solar arrays across the River Trent.<br><br>Noise and loss of Amenity Sturton le Steeple is a rural area with very low ambient noise levels. Some authorities suggest that solar arrays should be between 1 – 2 kms distance from homes and property based on noise and visual impact. Factors like the size of the farm, panel height, and the local environment are deemed to be more important than a fixed distance. The RES proposal does not meet this criterion but instead proposes to surround the village on all sides.<br><br>The issue of noise matters when these solar arrays are built near homes or schools as they emit nuisance noise whenever there is enough solar power to generate electricity. As the scope of this project will almost surround the Parish, the noise and vibration created will impact on the health and well-being of most residents. Noise is perceived by different individuals in numerous ways depending upon age and health; some will hear the noise while others will not. Inverter nuisance noise will certainly impact on the amenity of nearby residents, and the recreational amenity of all residents and visitors using footpaths and other Public Rights of Way on or nearby the solar array sites. This disturbance will significantly impact our wildlife by disrupting communication, navigation, and foraging behaviours, leading to increased stress, altered habitat use, and reduced reproductive success. Animals rely on sound for crucial life functions, and human-generated noise interferes with these processes, ultimately affecting their survival | contribution from the Proposed Development is combined with existing noise climate at each receptor, the change in noise level is insignificant and no mitigation measures are required.<br><br>Construction and decommissioning sound and vibration from the introduction and removal of the Proposed Development could be significant in the absence of standard mitigation measures which would incorporate the adoption of a Construction Environmental Management Plan (CEMP) and the use of 'best practicable means' (BPM) to reduce and mitigate construction sound and vibration levels as far as reasonably possible. However, provided that the appropriate mitigation measures are adopted as a matter of due course and that particular attention is paid to potentially sensitive locations, levels are unlikely to exceed typical limiting criteria at nearby properties at which point sound and vibrations could be heard. This aspect is therefore considered to consequently have a low overall impact, with the corresponding significance of effect being moderate/minor. Therefore, construction and decommissioning impacts are also not considered significant.<br><br>BMP to minimise noise during construction and decommissioning are included within **ES Appendix 4.1 Outline Construction Environmental Management Plan (oCEMP) [APP-089]** and **ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]**. No mitigation beyond implementation of construction and decommission BPM is required. |

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| | and the overall health of ecosystems. All life, be it human or animal, in the near proximity of our village will be subject to many decades of this disturbance and acoustic pollution. A perceived advantage of solar facilities is that they are silent and only operate during the day. However, facilities with battery energy storage systems (BESS) do result in transformer and inverter operation during the night, there is a real need for acoustic evaluation and noise control with respect to nighttime operations of solar energy components but equipment manufacturers are extremely reluctant to release data on the acoustic output of the equipment they supply. However, while quiet transformers and inverters are available, due to their premium cost, they are generally not a specification point the solar facility designers are willing to consider. Solar energy facilities can be designed to be inaudible, but this is generally achieved only after site evaluation and planning. Another aspect that has been ignored is the problem of wind noise/resonance from the construction of large panel structures. It is estimated that the construction and assembly of the 850,000 solar panels will take two years to complete. As this project proposes to almost surround the settlement, it is Inevitable this will cause noise nuisance, in addition to the dust and loss of amenity from disruption of well used public rights of way and bye ways. The cumulative effect of all the proposed projects will massively affect the number of heavy vehicles and vehicles of all types using our small and limited rural roads. Past experience has proved that these 'foreign' vehicles will disregard posted speed limits and that Police enforcement will be non-existent. The faster a vehicle travels, the louder the tyre noise from the road surface. I have stood for | Requirement 7 (CEMP) and 21 (Decommissioning and Restoration Plan) of the **dDCO [APP-041]** secure additional details building on the outline details provided for each plan.<br><br>The **Statutory Nuisance Statement [APP-179]** considers whether, amongst other matters, noise and vibration impacts will give rise to a statutory nuisance. That statement concludes the Proposed Development is not likely to give rise to a statutory noise or vibration nuisance, or any other statutory nuisance. |

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| | many hours at the roadside conducting Neighbourhood Speed Watch surveys and know that faster speed means increase vehicle noise. I can hear the sound of a combined harvester at work at well over a mile from my garden during harvest time but despite my best efforts in the short time allowed for this comment stage have not been able to find suitable equipment to measure the ambient noise levels.<br><br>Quality of Life/Human Rights When I purchased this property, I was well aware of the contribution the Trent Valley power stations made to the prosperity of the United Kingdom and could see the Cottom and High Marham units south of my garden. West Burton is out of view but I can see the recent CCGT stations if I look towards Gainsborough. If I look due east, I can see the new Sturton Quarry on whose Laison Committee I sit on behalf of the Parish Council. I have been involved with the quarry, as a Parish Councillor, since its inception in 2004. Over the past decades, the village has suffered considerable inconvenience from the building of the CCGT stations and the diversion of traffic from the A620 and A613 highways to our rural roads due to speed over distance restrictions. As a village we have embraced the establishment of the Wood Lane solar array off Wheatley Road, Sturton Quarry on Gainsborough Road, and in no way can the residents be accused of being Nimbys in wanting to restrict new developments.<br><br>However, I was single when I purchased this property in 1989 but my future wife refused to move from her home in the nearby town of Retford as my future stepdaughter was a pupil in a local infant school. | |

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| | When she moved to a secondary school in Doncaster, it meant that she had to catch a dedicated school bus from Retford to Doncaster and return. It was not until the advent of this century that Sturton le Steeple gained a regular bus service through the village and so throughout the 1990s, I took my stepdaughter daughter to the Retford bus station to catch the school bus. However, whenever I was away from home on business, my stepdaughter had to walk a mile from our home to North Leverton to catch a service bus to Retford bus station to board the school bus. In the evening, she was obliged to walk home from North Leverton. On dark winter mornings and evenings, this was a perilous undertaking due to the narrow footpath and the very high speed of vehicles on our busy unlit country roads. There were rare occasions when my stepdaughter had to miss school because she got so wet walking to the next village, she had to come home.<br><br>We look out of our rear garden and look across many miles of open countryside all the way to the city of Lincoln, whose 12th century Cathedral is clearly visible day and night and especially when lit up over the Christmas holiday. However, that view is also home to more than 48 x 400 MV high voltage electricity pylons that spread south from the West Burton site and away into the distance down the Trent valley. Quite soon, if National Grid has its way, the view from our front windows will be of the new North Humber to High Marnham 400 MV electricity transmission pylons just 400 metres away when looking towards the west.<br><br>My family gave up the convenience of town living to join me in our present home due to the quality of life the village offered us. Being an | |

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| | agrarian area, our lifestyle revolved around the seasons and the lives of those involved in agriculture. The valley fields change colour over the year but harvest time is especially important, when the crop (wheat, barley, maize or rape seed) grown alongside our home is harvested. The whole aspect of the valley changes during harvest time reminding us that a long cold winter is not far behind. Our location is rich in wildlife and ranges from deer, foxes, badgers, hedgehogs, brown hares and rabbits to buzzards soaring overhead, to the Tawney Owls at the bottom of our garden and Egrets in the fields and drainage ditches.<br><br>It is something magical on a cold, winter's night seeing a fox ambling across the field, silhouetted against the white frosty ground, or a pair (or more) of brown hares chasing around the field alongside our garden in the Spring. The amenity of village life such as walking on our quiet country lanes and footpaths in open countryside, cannot always compensate for the lack of town or city attractions, supermarkets and cinemas, but it is to be appreciated and enjoyed.<br><br>I have just had lunch in the garden with my family who are over on holiday from their home in Italy. Our home is at an altitude of approximately 15 m above sea level and the Trent Valley slopes down from our garden to towards the River Trent about a mile away. Approximately half the valley floor that can be seen from my home will be covered in a vast solar array surrounded by 9 m fencing and CCTV cameras plus Sturton Quarry. The quarry is shielded by a plantation of trees and is currently out of view whereas the RES proposal will be plainly visible and not only destroy the peace and tranquillity of the scene but will almost completely surround the village, all to the benefit | |

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| | of an absentee landlord from Oxfordshire with connections to a former Prime Minister.<br><br>This proposal will extinguish the very benefits and amenities village life provides. It will destroy our way of life, much of our wildlife and most of our countryside for an obsolete, inefficient method of generating electricity. As a community, we have embraced the concept of Fusion power being developed on the West Burton site. Critics may argue that it is a pipe dream that is unachievable but the technology is being developed worldwide. If the Fusion concept is proved successful, it will make the 850,000 panels envisaged by the proposal obsolete overnight.<br><br>Flooding Sturton le Steeple and surrounding villages lie in the Trent Valley between a range of low-lying hills that reach up to a height of 75 m and the river Trent. The top soil is quite shallow and is underpinned by large areas of clay. When it rains, the water runs down the hills towards the Trent and on several occasions in recent memory have caused localised flooding that has prevented residents from travelling from the villages to go to work. Even in my garden, surface water runoff from the fields during heavy rain has caused localised flooding despite additional drainage being installed when I moved into the property.<br><br>The proposed development, even with the inclusion of Sustainable Drainage Systems, needs to demonstrate that it will not increase surface water run-off rates from the site, or increase flow velocities, thereby increasing flood risk or causing erosion. Concerns exist regarding the effectiveness of these measures in controlling runoff, especially during extreme weather events. The impermeable nature of the panels and | |

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| | associated soil compaction during the construction phase must also be taken into account as well as potential damage to field drains, given the land is mostly clay based where the panels are planned to be sited.<br><br>Consultation Fatigue The sheer number of proposals in one area in a short space of time has been overwhelming and village residents feel their concerns regarding this and other project's environmental and social impacts have not been fully addressed. The various developer's engagement with the community has been poor and has failed to explain and alley genuine concerns. These projects include many hundreds of pages of technical and complex documentation that it is impossible for the layperson to even read, let alone digest, comprehend and effectively comment.<br><br>To quote a comment from a recent community event, “The constant threat of over-industrialisation and the bombardment of information relating to multiple projects is adversely impacting on the health and wellbeing of our community. This is generating huge amounts of stress and uncertainty. I work in healthcare we are a social species so this anxiety spreads like wildfire.”<br><br>Despite 98% of our community opposing the RES proposal, I doubt if more than 5% will respond to this consultation. There is just too much to information and documentation for the layman to absorb, let alone make relevant comments on such a wide-ranging number of proposals. We are being treated like mushrooms, but instead of being kept in the dark, we are being overwhelmed with a deluge of information we do not understand or are unable to comprehend. | |

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| | This layman concludes with the following plea. The loss of my view, my quality of life and the effect on my mental health and those of my family and fellow villages is irrelevant for planning purposes but I would urge those reading our objections to take into consideration our lives and our homes and the effect your decisions can have upon them | |

## Table 4-24: RR-048 Bev Fullwood

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-048 | There are many reasons why this proposal should not be approved: Mass industrialisation of a rural community; Increased flood risk caused by run off; Undermining of the Neighbourhood Plan on several counts; Undermining of the Bassetlaw Strategic Plan; Accumulative effects on residents and surrounding village by three separate industrial developments; Negative impact on the ecology of the area; Negative impact on rural heritage of the area and loss of food production. | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• D: Cumulative Effects<br>• F: Food Security<br>• H: General concern regarding impact on wildlife<br>• M: Increased flood risk<br>• N: Economic Impact on the local farming community<br>The Applicant notes the comments about the Proposed Development's alignment with local neighbourhood and strategic plans. The Planning Statement [APP-182], submitted as part of the DCO Application, sets out the need for the Proposed Development and demonstrates how it accords with both national and local planning policy. In accordance with the Planning Act 2008, the statement recognises that National Policy Statements (NPSs) form the primary basis for decision-making on |

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| | | NSIPs and take precedence over local development plans where there is conflict. |

## Table 4-25: RR-050 Ruth Edwards

| RR Ref | Comment from Relevant Representation | Applicant Response |
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| RR-050 | The Steeple Renewables solar project, NSIP EN010163/APP/4.3 I OBJECT to the above project on the following grounds:<br><br>ARGUMENTS AGAINST THE PROPOSED SOLAR FARM AT STURTON<br><br>The planned "farm" will completely surround our village, extend to the four next villages, and be visible from all angles of approach; thus the village will be totally surrounded by 8ft high fences with 24/7/365 surveillance and a complete landscape of glass panels: THIS IS INHUMAN – would you like this outside your front door?? The hamlet of Fenton will be completely engulfed by panels as far as the eye can see. These are not some distant remote fields seen in passing – these are fields in which we humans live and work. WOULD YOU AND YOUR FAMILY LIVE IN THE MIDDLE OF A GLASS DESERT, SURROUNDED BY 8FT HIGH FENCES, UNDER CONSTANT SURVEILLANCE, WITH 24 HR NOISE FROM FLAMMABLE BATTERIES ??? See the map in the Fields for Farming submission: | The Applicant's position is as set out in the application documents, for a summary of this please refer to the following common responses:<br>• A: General Opposition to the Proposed Development<br>• D: Cumulative Effects<br>• F: Food Security<br>• H: General concern regarding impact on wildlife<br>• K: General concern regarding the size and scale of the Proposed Development<br>• L: Increased flood risk<br>• N: Economic Impact on the local farming community<br>• O: Impact on the local landscape<br>The Proposed Development will incorporate fencing for security and safety reasons. Permissive paths will be enclosed with stock wire deer fencing up to 3m in height. Operational areas of the Proposed Development will be surrounded by perimeter fencing up to 3m in height. The Proposed Development incorporates landscaping and planting to soften the proposals and mitigate visual impacts. |

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| | The proposed solar "farm" would occupy 88% of all the parish land and completely engulf the village, the hamlet of Fenton being particularly affected, and extend to the four villages 1 mile distant to the west, south and east. Together with all the projects outlined below, a great many projects already in hand or permitted which directly affect the village of Sturton le Steeple, just 500 inhabitants, this is one huge project too many which will be imposed on us if you consent this: ENOUGH IS ENOUGH: please consider we have:<br>• a quarry to the east which will very shortly be in full production and cause 120 heavy lorry movements per day, and may well need more land westwards which would encroach on the proposed "farm", such is the need for building materials due to the promised increase in housing, and the excellence of the Trent Valley sand and gravel in construction work;<br>• a potential gas power station being constructed at West Burton 'C' which has full planning permission; and associated BESS units both here and a short distance north;<br>• the demolition and clear-up of West Burton 'A' power station which is in progress;<br>• the construction of a nuclear fusion energy plant on its footprint (providing REAL jobs);<br>• the construction of three solar farms, immediately north at Busy Bee, and the two applied for, at Bole and immediately north of the village opposite the existing power station; | The Applicant notes concerns about the origin of the materials that will be used in for the Proposed Development. It is assumed that solar PV modules and PV framework will be sourced from China, which currently produces the majority of the solar modules worldwide. The Applicant will look to source the rest of the material more locally, as far as possible. The Applicant commits to upholding human rights and labour rights in accordance with both national and international law. The Applicant requires its own teams as well as all its business partners and suppliers, to adhere to these laws. The Applicant takes ethical business practice very seriously and has a zero-tolerance policy to human rights violations.<br><br>The Applicant notes the concern about the potential impact of the Proposed Development on heritage assets. Potential impacts to the significance of the heritage assets are considered in **ES Chapter 9; Cultural Heritage [APP-067]**, and **ES Appendix 9.1 Cultural Heritage Technical Baseline [APP-122]**. There will be no direct impacts in relation to designated heritage assets, so none of these assets will be lost. However, potential impacts to setting are also considered as part of the baseline and ES chapter referenced above. The archaeological potential of the Site has also been assessed in detail in the above documents and development has been offset from the greatest areas of potential. Further phases of evaluative works are proposed pre-determination **ES Appendix 9.4 Outline Written Scheme of Investigation for Pre-Determination Trial Trenching [APP-125]**, and post-determination **ES Appendix 9.5 Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**. The |

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| | • the construction of a major power line right through the western part of the village (North Humber to High Marnham HT pylon line);<br>• a Ministry fuel pipeline running through the east of the village and proposed solar "farm" site, where access may be needed at any time;<br>• A solar "farm" of 200 acres already consented by the local authority between Sturton and the next village;<br>• the removal of ash from West Burton power station, for use in building materials;<br><br>In allowing this "farm" you and the landowner would be obliterating the jobs of agricultural workers and allied trades whilst reducing our food security and enriching further the prosperous landowner (Redacted) who lives in a bucolic estate at (Redacted)<br><br>Bassetlaw District Council is very keen to develop any possible tourist footfall as Sturton is one of the major Pilgrim Fathers villages; additionally many town people come to the village escaping the conurbation in order to enjoy the peace and scenery; implementation of the "farm" will not only cause loss of agricultural employment but thwart any possible tourism development and employment;<br><br>The "farm" would be totally visible, and completely ruin any view, from the local historical asset and tourist attraction of Leverton Windmill, and would negate further exploration of the considerable historical and | inherently flexible nature of the Proposed Development allows for a range of mitigation measures to be considered with regard to other areas where archaeological remains are identified within the Order Limits. See **ES Appendix 9.5, Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126]**. |

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| | archaeological importance of this area through which a Roman road is known to have passed.<br><br>The promise of employment by the developers RES is totally false: if this site is allowed, there will be a very few weeks' work by a mobile site team to install the panels and fences, and the site will only warrant an occasional visit thereafter for forty years. Contrast this with the people you are depriving of full time work in the food growing agriculture which would take place in these fields and last a lifetime, as would that of the trades dependent on these people and those of us who rely on this country to produce food. We will NOT be held to ransom by another power, or import food using aircraft and shipping, known heavy polluters.<br><br>Whilst an office or factory may be relocated relatively easily, you simply cannot do this with farms!!! Over the ages knowledgeable, experienced country people have determined the best land for growing crops and raising animals - you cannot "move" a farm!!!<br><br>These solar "farms" will leave a dreadful legacy for y/our children & grandchildren, of thousands and thousands of acres full of redundant, obsolete metal/glass/chemical panels which more likely than not would have been made in the Far East by enslaved labourers; when asked, RES do not even have to begin to lay down any funds for the disposal of panels and return to use of the site until FIFTEEN YEARS after the site begins operation!!! It is questionable whether these companies which have jumped on the solar electricity bandwagon (with government | |

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| | help) and cashed in on taxpayer funded subsidies, will even exist after fifteen years!!<br><br>The evidence submitted by the Fields For Farming group, q.v., contains many references to documents which outline why this proposed development will have VERY negative outcomes - please read and note all their carefully researched figures. If you connive at this exploitation of land, local inhabitants, and food production, you will have this on your conscience for the next fifty years. Mega solar “farms” on land producing food CANNOT BE ALLOWED – DO NOT AUTHORISE THIS ONE.<br><br>ARGUMENTS AGAINST SOLAR FARMS IN GENERAL<br><br>Farm land should be used for producing CROPS and LIVESTOCK, i.e. FOOD. By depriving this country of the ability to produce its own food you are greatly weakening national food security, This country can then easily be held to ransom by another – we have recently seen what has happened in Gaza. Food would have to be imported using aviation and ship bunker fuel – two of the worst fuels known for polluting – that is NOT “green”.<br><br>It is a symptom of the U.K.’s broken food system that farmers, having a constant battle against weather, infestations, market vulnerability, etc are taking all the risks of food production and doing all the unceasing work which goes into it. Having been supported by government the farmers are now losing that support whilst the food processors and retailers continue to make huge profits at their expense. | |

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| | It is a land grab by land owners who see easy profits from (often foreign) investors and companies with considerable reserves available, supported and encouraged by this government, and who have no conscience about the agricultural workers, their accommodation, and their allied trades, losing their livelihood, or for the condition of the land after use, whether it will be fit for food production ever again. These companies exploiting this resource and government aid do not even have to start depositing funds for final remove/land rectification until 15 years into the "farm" going into service, and there's no guarantee whatsoever these companies will exist in 40 years time;<br><br>The panels: they are made of glass and chemicals (which can leech out into the ground below); in the majority of cases they are made in China by (Redacted); they are vulnerable to the climate; they are so numerous (millions per site); as technology is advancing so fast they are probably obsolescent as they're fitted and obsolete shortly afterwards; they will be a huge burden on our (grand) children to have to deal with them at some future point; they are only 23% efficient at best and this deteriorates with time.<br><br>The land: unlike manufacturers and businesses who can simply move to a new factory/office in another location, a farmer can't just move his 300+ acres elsewhere. Their land has been chosen over the centuries by people who knew and worked that land, as the best for providing crops/pasture, and once it's gone under a solar "farm" it's lost. Comparisons with e.g. golf courses are odious: they are not productive | |

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| | and can be established elsewhere; nor is it valid to say, “it’s only so much (little) per cent of our land” – land is FINITE, needed for so many purposes, and comes in such variety only a proportion of it is suitable for farming. Whether the ground can ever be used for agriculture again remains to be seen, and the claim sheep can roam the solar “farms” is a fallacy – very very few are able to support this inefficient manner of keeping livestock. If solar panels must be used, there are far better locations than active farmland, as every other country except the UK has shown, by deploying panels on roofs, carparks, motorways, train tracks, etc etc. Please read: (Redacted)<br><br>Farms: solar “farms” replace huge areas of natural landscape, grass, crops, vegetation, with totally unnatural areas completely covered in glass and BESS units. They’re surrounded by 8 – 10 foot high fences and are under 24/7/365 surveillance. They prevent the passage of wildlife on its age-old tracks, and are totally forbidding to humans when rights-of-way pass through them.<br><br>Solar “farms” are often “mitigated” by creation of other (“rewilded”) areas – WHY? Leave the natural world alone to do its work of turning the carbon dioxide we breathe out into the oxygen we need to live. And who in government is going to be checking that these areas are in fact working?? Once the land owners and the companies have installed the solar and run off taking the government’s, i.e. OUR money with them, and no longer exist/cannot be traced, who will ensure the safety and efficacy of the solar as the years go by and it deteriorates and could be replaced by far superior products??? Who will gain recompense when the energy generated cannot be accepted onto the grid, as happens | |

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| | NOW, never mind when the thousands and thousands of solar power hectares planned come on line? | |