

Steeple Renewables Project

Applicant Response to Written Representations and Other Documents Submitted at Deadline 1

January 2026

Document Reference: EN010163/EX/8.10

Revision: 1 Original

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(b)



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Document Properties		
Prepared By	The Steeple Renewables Project Consultant Team	
Version History		
Version	Date	Version Status
Examination	January 2026	Rev 1 - Original

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1 Introduction

1.1.1 This document provides Steeple Solar Farm Limited (the ‘Applicant’) response to Written Representations (the ‘WRs’) and other documents submitted to the Planning Inspectorate by the 28 November 2025, relating to Deadline 1 respectively for a Development Consent Order (‘DCO’) regarding the Steeple Renewables Project (the ‘Proposed Development’).

1.1.2 The Applicants response to the Nottinghamshire County Council’s Local Impact Report (‘LIR’), issued on the 28 November 2025 **[REP1-014]**, as well as Examining Authority First Written Questions (‘ExQ1’), issued 11 December 2025 **[PD-005]**, have been responded to separately by the Applicant at Deadline 2.

1.1.3 In total 43 WRs and other documents **[REP1-015 to REP1-057]** were submitted to the Examining Authority by interested parties in response to the Proposed Development. WRs were published on the 27 November 2025 on the Planning Inspectorates website (reference: EN010163).

1.1.4 This document provides responses from the Applicant to WRs and other documents received at Deadline 1 were a responses is considered necessary by the Applicant (not every WR and other document has been responded to). The structure of this document is as follows:

- Table 1.1 tabularised list of WRs and other documents the Applicant has responded to.
- Section 2 tabularised WRs and other document comments as well as the Applicants corresponding response.

**Table 1.1 List of Written Responses and Other Documents that
are responded to in Section 2**

PINs reference	Written Responses
REP1-018	National Highways
REP1-020	National England Risks and Issues Log
REP1-021	Network Rail Infrastructure Limited
REP1-024	Fields for Farming – Biodiversity
REP1-025	Fields for Farming – Landscape and Visual
REP1-026	Fields for Farming – Photo's
REP1-029	Fields for Farming – Agenda Item 3
REP1-030	Fields for Farming – Agenda Item 4
REP1-032	Fields for Farming – Agenda Item 6
REP1-033	Fields for Farming – Agenda Item 7
REP1-034	Fields for Farming – Agenda Item 8
REP1-035	Fields for Farming – Agenda Item 9
REP1-038	Peter Warburton
REP1-039	Sturton-le-Steeple Parish Council
REP1-046	Christine Warren
REP1-053	Robert Joseph Fleming (Submission 1)
REP1-054	Robert Joseph Fleming (Submission 2 – Traffic and Transport)
PINs reference	Other Document
REP1-016	Environment Agency
REP1-036	Fields for Farming and North Leverton Trust
REP1-043	Adrien Conn
REP1-047	Emily Byatt
REP1-056	Sharon McDonald

2 Applicant Response to Written Representations and other documents listed in Table 1.1

Table 2-1: National Highways

ID	Theme	Verbatim Comment	Applicant Response
REP1-018/1	Introduction	<p>National Highways welcomes the opportunity to review and comment on relevant documentation received for the proposed development of Steeple Renewables in the Examination stage for Development Consent Order (DCO) Application.</p> <p>National Highways ("we") have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>In this consultation, the following documents have been reviewed:</p> <ul style="list-style-type: none">• Document Reference: EN010163/APP/6.3.13: Transport Assessment	<p>The Applicant notes this comment.</p>

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		<ul style="list-style-type: none">• Document Reference: EN010163/APP/6.2.13: Environmental Statement, Chapter 13, Transport and Access• Document Reference: P22-1144 TN01: Transport Technical Note	
REP1-018/2	Operational Traffic Impact	<p>Based on the review of the above documents, we have the following comments:</p> <p><u>Operational Traffic Impact</u></p> <p>The nearest SRN junction to the proposed solar farm is the Blyth Interchange on the A1 (M) (Junction 34), which is located approximately 20km west of the proposed solar farm. We are content that the traffic to be generated during operation of the proposed solar farm will be minimal at the SRN.</p>	This comment is noted by the Applicant.
REP1-018/3	Construction Traffic Impact	<p><u>Construction Traffic Impact</u></p> <p>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.</p>	This comment is noted by the Applicant.
REP1-018/4	Construction Traffic Impact	<p>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.</p>	This comment is noted by the Applicant.

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REP1-018/5	Construction Traffic Impact	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.	This approach is set out in the Outline Construction Traffic Management Plan (oCTMP) [APP-129] and is secured by way of Requirement 8 within the dDCO [APP-041] .
REP1-018/6	Construction Traffic Impact	We welcome the provision of the traffic flow diagrams on A1 (M) Junction 34 Blythe Interchange that contain the total Traffic, HGV, and Car/LGVs for the 'Month 7' (peak delivery month) and 'Month 22' (peak construction worker trips), during the construction phase.	This comment is noted by the Applicant.
REP1-018/7	Construction Traffic Impact	With the traffic flow diagrams provided, we now understood and have summarised the peak hour traffic demands at Blythe Interchange in 'Month 7'.	This comment is noted by the Applicant.
REP1-018/8	Construction Traffic Impact	With the traffic impact at the Blythe Interchange is over 30 vehicles / hour during both AM and PM peaks, we recommend junction capacity assessment shall be provided for the Month 7 (peak delivery month) scenario.	The Applicant does not consider it necessary to undertake junction capacity assessment at the Blythe Interchange (A1M junction 34) as construction vehicular traffic movements can be scheduled outside any peak hours such as AM and PM peaks, an approach set out in the oCTMP [APP-129] and as part of the mitigation measures, which can be conditioned as part of the DCO. Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan (CTMP) that builds on the details in the oCTMP. Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-032/2 page 90 setting out the Applicants comments.

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REP1-018/9	Construction Phase	<u>Construction Phase</u> 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.	This comment is noted by the Applicant.. Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-032/3 page 91.
REP1-018/10	Operational Phase	<u>Operational Phase</u> 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.
REP1-018/11	Decommissioning Phase	<u>Decommissioning Phase</u> National Highways is content that a Decommissioning Plan shall be secured through a requirement of the DCO.	This comment is noted by the Applicant.
REP1-018/12	Abnormal Loads	<u>Abnormal Loads</u> We note that the construction contractor has not yet been appointed, the proposed routing for deliveries is therefore unknown at this stage. We encourage the Applicant to engage with National Highways as soon as possible to establish an	Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-032/5 page 92. The Applicant agrees it will engage with NH in the normal way to establish an effective movement strategy for delivering AILs.

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		effective movement strategy when the information of routing dimensions and frequencies of AILs are available.	
REP1-018/13	Abnormal Loads	<p>It should be noted that Special Orders will be required for loads exceeding 150 tonnes pursuant to section 44 of the Road Traffic Act 1988. This falls outside of the DCO process. A feasibility study should be completed assessing the suitability of the network for the proposed route of the Special Orders. Feasibility studies are high-level assessments designed to determine whether the SRN is structurally capable, at this stage, of accommodating the proposed heavy loads.</p>	<p>This comment is noted by the Applicant and agreed that at the relevant time NH will be engaged with for Abnormal Loads as required and a feasibility study undertaken as required.</p>
REP1-018/14	Abnormal Loads	<p>Separate to this, the Applicant must submit a formal applications closer to the actual movement date (normally 5 days before) once a haulier has been appointed. At that time, route suitability will be re-checked with all relevant structure and road owners, and a permit for all movements will be issued.</p>	<p>Noted and agreed at the relevant time NH will be engaged with and formal applications applied for, for Abnormal Loads as required.</p> <p>REP1-006 section 5 Other consents and licences at Table 1 point 5, sets out “permit for transport of abnormal loads”, and Appropriate applications and notifications, in accordance with ES Appendix 13.2 and as per the oCTMP [APP-129]. will be made by the contractor in advance of the delivery of abnormal load.</p>
REP1-018/15	IEMA/ISEP	<p><u>IEMA/ISEP</u></p> <p>Thresholds We note that the traffic impact at A1(M) Junction 34 is forecasted to be 336 daily trips during the peak construction delivery (in Month 7). We also acknowledge that while the threshold criteria for ISEP assessment is of 30% daily increase of traffic flow, the existing daily flows at concerned road network</p>	<p>This comment is noted by the Applicant.</p>

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		would be required to be below circa. 1120 daily vehicles to trigger the need of assessment.	
REP1-018/16	IEMA/ISEP	Whilst there is no survey data at A1(M) Junction 34 in WebTRIS datasets, we have carried out an independent check with the data available at the adjacent northbound slip from A1 to Blyth. From that, we are content that the existing traffic flow of A1(M) Junction 34 likely will not be below 1120 daily vehicles and shall not trigger the need of assessment.	This comment is noted by the Applicant and agreed.
REP1-018/17	Standing advice to the Planning Inspectorate	<u>Standing advice to the Planning Inspectorate</u> 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 visionled approach.	This comment is noted by the Applicant. The oCTMP [APP-129] includes a Construction Worker Travel Plan for the construction period, setting out appropriate measures for workers at the development. Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-032/6 pages 92-96.
REP1-018/18	Standing advice to the Planning Inspectorate	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.	This comment is noted by the Applicant. Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-032/6 pages 92-96.

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REP1-018/19	Standing advice to the Planning Inspectorate	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.	This comment is noted by the Applicant. Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-032/6 pages 92-96.
REP1-018/20	Standing advice to the Planning Inspectorate	I trust the above comments are helpful. Should you have any queries do not hesitate to get in touch.	The Applicant notes this comment and thanks National Highways for its participation.

Table 2-2: National England Risks and Issues Log

ID	Theme	Verbatim Comment	Applicant Response
REP1-020/1	Protected Species Licencing	NE 11 – RAG Yellow The project design principles include the avoidance of impacts to protected species as far as possible, to avoid the need for mitigation & protected species licensing, which is welcomed. 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)).	Please see the Applicants Natural England response reference RR -054/2 found on pages 151-152 of the Applicant Comments on Relevant Representations [REP1-008].

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		<p>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). This will provide the planning inspectorate with certainty during examination that impacts to badger can be mitigated.</p> <p>To date, Natural England have not received a draft protected species licence application for badger.</p> <p>A draft protected species licence application could be submitted to Natural England for Badgers. Cost incurred for this could be recouped from the existing DAS contract between Natural England and the Applicant.</p>	
REP1-020/2	ALC Survey Methodology	<p>NE 12 – RAG Orange</p> <p>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:</p> <p>a) Cable Route:</p> <p>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</p>	<p>Please see the Applicants Natural England response reference RR-054/3 found on pages 152-155 of the Applicant Comments on Relevant Representations [REP1-008].</p>

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	<p>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.</p> <p>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.</p> <p>b) Enhancement Areas:</p> <p>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.</p> <p>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.</p> <p>Natural England note that the majority of the Enhancement Areas are to be used for skylark mitigation (including continued</p>	
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	<p>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.</p> <p>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.</p> <p>Natural England advise that ALC survey of the cable route is required to:</p> <ul style="list-style-type: none">a) Inform avoidance of BMV in the first instance via micro-siting.b) Provide a baseline soil profile to inform restoration. <p>Natural England also advise that clarity should be provided with regard to the ecological enhancements (woodland creation, pond creation and other potentially damaging activities)</p>	
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		<p>proposed in the enhancement areas, specifically with regard to the statement that 'None of the ecological mitigation requires the soils to be disturbed (beyond ordinary cultivation and management)'. ALC survey of the areas to be used for pond creation and woodland creation is likely to be required to ascertain the soil type (and ALC grade), which will then inform the suitability of the soil to support the planting / habitat proposed and the soil handling requirements.</p>	
REP1-020/3	Development Design and Avoidance of BMV Land	<p>NE 13 RAG – Amber</p> <p>ES Chapter 3 (Site Description, Site Selection and Iterative Design Process) includes BMV land as a consideration during site selection, which is welcomed, however, little information is provided with regard to 'micro-siting' infrastructure away from BMV, or the highest grade BMV land within Chapter 3 and Chapter 15.</p> <p>ES Table 15.4 states that Section 15.6-15.7 include further information regarding how options have been considered to avoid or minimise loss of BMV land and maximise use of poorer quality agricultural land, however, little reference is made in these sections regarding avoidance of BMV land.</p> <p>Natural England request further detail on steps taken to avoid BMV as far as reasonably practicable, in line with the NPPF mitigation hierarchy and NPS EN-1 paragraph 5.11.12.</p>	<p>The Applicant notes this comment and can confirm development design, avoidance of BMV land and Risk Assessment point will be discussed with Natural England following ongoing engagement as part of the Examination. Each parties respected position will be confirmed within the Statement of Common Ground.</p>

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REP1-020/4	ALC Survey Results and Data Presentation	NE 14 – RAG Yellow 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). 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. Whilst natural England welcome the reference to the SMP ensuring temporary elements of the proposals (e.g. temporary construction compounds) are restored appropriately, we request details of the areas (in ha) to be impacted by temporary construction works (including construction compounds), to ensure PINS and the secretary of state fully understand the scale and likelihood of potential impacts.	Please see the Applicants Natural England response reference RR-054/4 found on page 155 of the Applicant Comments on Relevant Representations [REP1-008].
REP1-020/5	Soil Management	NE 17 – RAG Yellow 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	Please see the Applicants Natural England response reference RR-054/5 found on pages 155-156 of the Applicant Comments on Relevant Representations [REP1-008].

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		<p>element of the development (oSMP sections 7-12). Each element of the proposal may have a differing effect on the soil resource and must be managed appropriately.</p> <p>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.</p> <p>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.</p> <p>Natural England request the oSMP requirement is amended to include consultation with Natural England.</p>	
REP1-020/6	Soil Reinstatement	<p>NE 18 – RAG Yellow</p> <p>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</p>	<p>Please see the Applicants Natural England response reference RR-054/6 found on pages 156-157 of the Applicant Comments on Relevant Representations [REP1-008].</p>

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		<p>grade and condition as it was when the construction phase commenced.' (oSMP Paragraph 14.2).</p> <p>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.</p> <p>Whilst the intent to restore all areas to the same quality is clear, it is noted that this paragraph (oSMP Paragraph 14.2) refers specifically to reinstatement following decommissioning.</p> <p>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.</p> <p>Commitment should be made clear within the oSMP that all land disturbed temporarily during construction (Access tracks, construction compounds, cable routes etc) are also restored to the same ALC grade, informed by the ALC survey.</p>	
REP1-020/7	Monitoring & Research	<p>NE 19 - RAG Yellow</p> <p>At this stage, no soil monitoring or research is proposed through the project.</p> <p>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</p>	<p>Please see the Applicants Natural England response reference RR-054/7 found on page 157 of the Applicant Comments on Relevant Representations [REP1-008].</p>

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		<p>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.</p> <p>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.</p> <p>NE recommend that a scheme of soil health monitoring could be implemented across the scheme for the lifetime of the development.</p> <p>NE recommend that the scheme could include an area dedicated to research into future technologies and/or management practises (i.e. agrivoltaics).</p>	
REP1-020/8	Biodiversity Net Gain	<p>NE 20 – N/A</p> <p>ES Paragraphs 7.8.80 – 83 set out that the project will result in a net gain of:</p> <ul style="list-style-type: none">• 54.93% in habitat units• 35.53% in hedgerow units• 14.66% in watercourse units	<p>ES Appendix 7.12 - Biodiversity Net Gain Report [APP-114], 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.</p> <p>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</p>

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		<p>It should be noted that Natural England have not reviewed the Biodiversity Metric in detail. Nonetheless, Natural England welcome this provision, which exceeds the intended mandate of 10% (Biodiversity net gain for nationally significant infrastructure projects).</p> <p>Despite the calculated biodiversity net gains being significantly in excess of 10%, DCO Requirement 6 is limited to securing a minimum of 10% Biodiversity Net Gain.</p> <p>Natural England would encourage the applicant to secure gains in excess of the minimum 10%, as demonstrated within the Biodiversity Metric Calculations.</p> <p>It is noted that similar projects Cottam Solar Project and West Burton Solar Project both included commitment to significant Biodiversity Net Gains (see Requirement 9 of the DCOs for these projects as made by the Secretary of State).</p>	<p>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].</p> <p>The applicant aims to deliver 10% biodiversity gain despite this not yet being mandated for nationally significant infrastructure projects.</p>
REP1-020/9	Connecting People with Nature	<p>NE 22 – RAG Yellow</p> <p>"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 Section 7 (PRoW Management Plan) (Appendix 13.2). Whilst Natural England have no specific comment regarding the mitigation</p>	<p>Please see the Applicants Natural England response reference RR-054/8 found on pages 157-158 of the Applicant Comments on Relevant Representations [REP1-008].</p>

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		<p>measures proposed, the principles of the PRoW Management Plan are welcomed.</p> <p>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.</p> <p>There may be further opportunity through the scheme to improve public knowledge and understanding of both the Solar Project and its impact on Biodiversity and Access, i.e. through the use of Signage and interpretation boards.</p>	
REP1-020/10	Introduction	Natural England have created this Risk and Issues Spreadsheet to track progress of issues raised in our Relevant Representations throughout the Examination for the Steeple Renewables Project. Each issue was assigned a Red, Amber, Yellow or Green risk rating in our relevant representations, as defined below. The Rating will be updated at each deadline to clearly show progress made during examination.	The Applicant notes this comment and can confirm the Risk Assessment points will be discussed with Natural England following ongoing engagement as part of the Examination. Each parties respected position will be confirmed within the Statement of Common Ground.
REP1-020/11	Risk Rating	Red are those where there are <u>fundamental concerns</u> which it may not be possible to overcome in their current form.	
REP1-020/12	Risk Rating	Amber are those where <u>further information</u> is required to determine the effects of the project and allow the Examining Authority to properly undertake its task and or advise that further information is required on mitigation/compensation	

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		proposals in order to provide a sufficient degree of confidence as to their efficacy.	
REP1-020/13		<p>Yellow are those where Natural England does not agree with the Applicant's position or approach. We would ideally like this to be addressed but are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process. However, we reserve the right to revise our opinion should further evidence be presented. It should be noted by interested parties that whilst these issues/comments are not raised as significant concerns in this instance, it should not be understood or inferred that Natural England would be of the same view in other cases or circumstances.</p>	
REP1-020/14		<p>Green are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured).</p>	
REP1-020/15	Additional Info	<p>Key updates for D1 are primarily in column G.</p> <p>The spreadsheet contains filters to enable ease of viewing.</p> <p>Requested actions in our Relevant Representations are shown in Red Text.</p> <p>NE's key updated advice at the current deadline is shown in Bold.</p>	

Applicant Response to Written Representations and**Other Documents Submitted at Deadline 1****Steeple Renewables Project**www.steeplerenewablesproject.co.uk**Table 2-3: Network Rail Infrastructure Limited**

ID	Theme	Verbatim Comment	Applicant Response
REP1-021/1	Introduction	<p>We write further to Network Rail Infrastructure Limited's (Network Rail/NR) Section 56 Representation (submitted on 27 August 2025) which confirmed that Network Rail requires its standard protective provisions to be included in the draft Development Consent Order (Order). As currently drafted, the Draft Order (document reference number 4.3) does not afford any protective provisions for the protection of the railway, not least in a form that is considered by NR to sufficiently protect its assets and to ensure the safe and efficient operation of the railway (Protective Provisions).</p>	<p>The Applicant notes the comments made by Network Rail . On this basis the Applicant has included a set of protective provisions for the benefit of Network Rail in the dDCO. This has been based on Network Rail's standard protective provisions. The Applicant will engage further with Network Rail to determine the extent to which additional protections are required by Network Rail.</p>
REP1-021/2	Network Rail Protective Provisions	<p>Network Rail requires the form of Protective Provisions that are included at Appendix 2 to this representation. These Protective Provisions contain the necessary provisions that prevent compulsory acquisition of land and rights owned by Network Rail unless NR's prior consent is obtained. There is a longstanding principle that any exercise of compulsory acquisition powers pursuant to a DCO in respect of railway property must be subject to NR's prior consent and a restriction to this effect must be included in the Protective Provisions.</p> <p>Network Rail's position is that an absence of such protection in</p>	

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		<p>the Protective Provisions will cause a serious detriment to Network Rail's ability to:</p> <ul style="list-style-type: none">a) carry out its statutory undertaking;b) comply with its Network Licence; andc) safely operate the railway network.	
REP1-021/3	Protective Provisions	Should NR and Steeple Renewables Project (together the Parties) not be able to reach an agreement as to the inclusion of the Protective Provisions as part of the Order (should the Inspectorate be minded to grant the same), NR must maintain its objection to the DCO.	
REP1-021/4	Protective Provisions	We set out the reasons for Network Rail's position and a request for the inclusion of the necessary Protective Provisions on the Order in this representation	
REP1-021/5	Protective Provisions	The Application includes provisions which would, if granted, authorise the Applicant to carry out works on and in close proximity to operational railway land belonging to Network Rail, to use such land temporarily and to acquire permanent rights over such land. Network Rail must accordingly ensure that the Application is granted subject to the Protective Provisions which provide appropriate protection for the safe and efficient operation of the railway.	

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REP1-021/6	Protective Provisions	<p>As there are currently no Protective Provisions that are afforded to NR in the current draft of the Order there is crucially no restriction on the Applicant's use of compulsory acquisition powers without NR's prior consent (with such consent not being unreasonably withheld). NR requires the inclusion of the following provisions to form part of their Protective Provisions:</p> <ol style="list-style-type: none">1. (1) The undertaker must not exercise the powers conferred by—<ol style="list-style-type: none">(a) article 3 (development consent granted by the Order);(b) article 4 (maintenance of authorised development);(c) article 14 (discharge of water);(d) article 16 (authority to survey and investigate the land);(e) article 17 (compulsory acquisition of land);(f) article 19 (compulsory acquisition of rights);(g) article 22 (acquisition of subsoil only);(h) article 23 (power to override easements and other rights);(i) article 26 (temporary use of land for carrying out the authorised development);(j) article 27 (temporary use of land for maintaining the authorised development);	
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	<p>(k) article 28 (statutory undertakers);</p> <p>(l) article 20 (private rights);</p> <p>(m) article 36 (felling or lopping of trees or removal of hedgerows);</p> <p>(n) the powers conferred by section 11(3) (power of entry) of the 1965 Act;</p> <p>(o) the powers conferred by section 203 (power to override easements and rights) of the Housing and Planning Act 2016;</p> <p>(p) the powers conferred by section 172 (right to enter and survey land) of the Housing and Planning Act 2016;</p> <p>(q) any powers under in respect of the temporary possession of land under the Neighbourhood Planning Act 2017; in respect of any railway property unless the exercise of such powers is with the consent of Network Rail.</p> <p>(2) The undertaker must not in the exercise of the powers conferred by this Order prevent pedestrian or vehicular access to any railway property, unless preventing such access is with the consent of Network Rail.</p> <p>(3) The undertaker must not exercise the powers conferred by sections 271 or 272 of the 1990 Act, article 28 (statutory undertakers), article 23 (power to override easements and other rights) or article 20 (private rights), in relation to any right of</p>	
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		<p>access of Network Rail to railway property, but such right of access may be diverted with the consent of Network Rail.</p> <p>(4) The undertaker must not under the powers of this Order acquire or use or acquire new rights over, or seek to impose any restrictive covenants over, any railway property, or extinguish any existing rights of Network Rail in respect of any third-party property, except with the consent of Network Rail.</p> <p>(5) The undertaker must not under the powers of this Order do anything which would result in railway property being incapable of being used or maintained or which would affect the safe running of trains on the railway.</p> <p>(6) Where Network Rail is asked to give its consent pursuant to this paragraph, such consent must not be unreasonably withheld but may be given subject to reasonable conditions, but it shall never be unreasonable to withhold consent for reasons of operational or railway safety (such matters to be in Network Rail's absolute discretion).</p> <p>(7) The undertaker must enter into an asset protection agreement prior to the carrying out of any specified work.</p>	
REP1-021/7	Protective Provisions paragraph 4(1)	Network Rail requires the inclusions of the above protections, for the following reasons: Paragraph 4(1)	

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		<p>The Applicant proposes to compulsorily acquire permanent rights over the plots set out at Appendix 1.</p> <p>If NR's consent is not required to be obtained prior to such acquisition and temporary use of this land, it would give rise to a significant, unacceptable risk that the Applicant could compulsorily acquire a right over or temporarily use (as applicable to the respective plots) railway land which would not be subject to the approvals, conditions, limitations and restrictions necessarily required by NR (including any conditions deemed to be required by NR's engineers through its business and technical clearance process) to facilitate and ensure the safe and efficient operation of the railway. Such processes and protocols are implemented by Network Rail to regulate third party interference with the railway and any such interference must be subject to the requisite approvals in order for Network Rail to be in compliance with its Network Licence (as described in further detail below). It is inconceivable that the Applicant should have the powers to circumvent such protocols by way of exercising powers of compulsory acquisition.</p>	
REP1-021/8	Protective Provisions paragraph 4(1)	NR operates under a Network Licence granted by the Office of Rail and Road (ORR) (a copy of which is appended to this submission). Under its Network Licence, NR is obliged to ensure compliance with a wide number of standards imposed by the Rail Safety and Standards Board that pertain to maintaining the	

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		<p>safe and efficient running of trains on the railway. In order to regulate its ability to comply with such standards, NR must retain stringent restrictions, controls and procedures over any interferences with the railway by third parties, including by reason of persons exercising rights on or over railway land. NR imposes such restrictions through a requirement to obtain its prior consent before rights are compulsorily acquired or railway land is temporarily used and by requiring the parties to enter into an asset protection agreement.</p>	
REP1-021/9	Protective Provisions paragraph 4(1)	<p>Accordingly, where a right is compulsorily acquired and may be exercised over railway land which is not subject to NR's prior consent, such a right is created outside of NR's control and would not be subject to the necessary restrictions and conditions that NR would regard as sufficient so as to enable it to comply with its Network Licence. For example, NR may require that rights granted to the Applicant are subject to reservations allowing NR to interrupt the exercise of such right in certain circumstances (such as enabling NR to deal with emergencies on the railway or carry out necessary works or the exercise of such rights or such temporary possession may not be safe to be exercised at certain times). Where NR's prior consent is not required before exercising these powers over railway land, there is a risk that any such rights or such temporary possession would not be subject to the required restrictions and as a result NR's</p>	

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		<p>control over its ability to appropriately manage the safety of the railway would be compromised. The consequences of NR not being able to effectively manage the safety of the railway could be catastrophic. Moreover, this could lead to a failure by NR to comply with its Network Licence which is not position which can be accepted by NR, nor would it be acceptable to the ORR as NR's regulator.</p>	
REP1-021/10	Protective Provisions justification paragraph 4(1)	<p>Network Rail cannot relinquish control over rights being exercised on the railway where the consequences of doing so could be so significantly adverse. Network Rail have made contact with the Applicant's Solicitor to agree the grant of the necessary rights through private agreement, but these negotiations are still in the early stages and so the relevant agreements are not yet in place.</p>	
REP1-021/11	Protective Provisions justification paragraph 4(1)	<p>A restriction on the compulsory acquisition of rights over railway land is a widely accepted and longstanding principle which has been accepted by the Examining Authority and Secretary of State on numerous DCOs including but not limited to: the A47/A11 Thickthorn Junction DCO, Thurrock Flexible Generation Plant DCO, Yorkshire and Humber CCS Cross Country Pipeline DCO, Sunnica Energy Farm DCO, Longfield Solar Farm DCO and South Humber Bank Energy Centre DCO. The purpose of this restriction is not to impede the implementation of the Applicant's scheme, but to secure the necessary protection to</p>	

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		NR as a statutory undertaker in order that it can properly regulate the rights to be exercised over its railway network and which is appropriate function and purpose of protective provisions.	
REP1-021/12	Protective Provisions paragraph 4(2)	Network Rail is required to maintain strict safety protocols under its Network Licence that is granted by the ORR. As previously mentioned, NR is required to ensure compliance with a number of safety standards. For Network Rail to ensure compliance with such standards, Network Rail employees and contractors must have the ability to access to railway property and this access cannot be impeded without NR's consent as it could result in a breach of NR's Network Licence. Network Rail requires the inclusion of paragraph 4(2) in the Protective Provisions for this reason	
REP1-021/13	Protective Provisions paragraph 4(3)-(6)	Network Rail not only has a duty to ensure the safe and efficient running of the railway for employees, third parties, members of the public and all others who come into contact with the railway; it also has an overarching duty to preserve the integrity of the railway. Compulsory acquisition of land is for this reason not appropriate where said acquisition concerns operational railway land and must therefore be subject to Network Rail's prior written consent. Should rights be acquired over railway land without such consent being obtained then the right is created outside the control of Network Rail and may not be subject to	

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		<p>the necessary restrictions and conditions that Network Rail would regard as sufficient so as to enable it to comply with the Network Licence and its wider statutory undertaker responsibilities.</p>	
REP1-021/14	Protective Provisions paragraph 4(3)-(6)	<p>Similarly, where proposed compulsory acquisition is of rights over railway land where Network Rail has the benefit of easements and other rights, such acquisition would not be subject to Network Rail's usual process of obtaining both business and technical clearance (a process by which network rail engineers assess the detriment to the railway). If such rights are acquired outside of this process implications are that Network Rail could be in a position where the railway is unsafe (with catastrophic consequences), and Network Rail are compromised in both its position as statutory undertaker and ability to ensure the safe and efficient running of trains on the railway.</p>	
REP1-021/15	Protective Provisions paragraph 4(3)-(6)	<p>Network Rail are willing to engage with the Applicant to agree the terms and extent of the rights being sought. In doing so (and discussed above), Network Rail are under a duty to act reasonably in their role as statutory undertaker. However, Network Rail cannot be placed in a position where they are to relinquish the degree of control over the railway being sought by the Applicant as the consequences of doing so are significantly adverse.</p>	

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REP1-021/16	Protective Provisions paragraph 4(7)	<p>An Asset Protection Agreement (APA) is required to be entered into in order to support the review of the design of a specified work and to facilitate access on to railway land. An APA is a contracting agreement between Network Rail and an outside party to allow interaction and to establish roles, responsibilities and liabilities of a project over, under or adjacent to the railway. The APA enables NR's Asset Protection Team to regulate managing access, site safety management, engineering services, and possession arrangements as necessary. The Protective Provisions must include a requirement for the Applicant to enter into an APA in order for NR to fulfil its statutory duty to protect the railway in accordance with the terms of its Network Licence. It is therefore submitted that Network Rail would be acting reasonably in requiring that any such required APA be entered into before any specified work is carried out. For the reasons set out above, NR must maintain its objection to the application for the DCO and must insist on the inclusion of the form of Network Rail's Protective Provisions as set out in this submission and the DCO should not be granted in its current form.</p>	<p>The Applicant and Network Rail entered into a basic asset protection agreement (BAPA) on 24 July 2025 for the purpose of protecting Network Rail's assets and to facilitate the carrying out of works associated with the Proposed Development by the Applicant.</p> <p>The Applicant will engage further with Network Rail to determine the extent to which additional protections are required by Network Rail.</p>
REP1-021/17	S.127 of the Planning Act 2008	<p>In addition to the points set out above, without the inclusion of Network Rail's standard Protective Provisions, NR must also maintain its objection to the DCO on the basis that the proposed compulsory acquisition of rights over railway property does not satisfy the test in section 127 of the Planning Act 2008 in that:</p>	<p>Please refer to the Applicant's above response [REP1-021/16].</p> <p>The Applicant will engage further with Network Rail to determine the extent to which additional protections are required by Network Rail.</p>

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		<p>(a) the right cannot be acquired without serious detriment to the carrying on of the undertaking; and</p> <p>(b) such detriment cannot be made good by Network Rail by use of other railway property.</p>	
REP1-021/18	S.127 of the Planning Act 2008	<p>The reason for which is that:</p> <ol style="list-style-type: none">1) a substantial number of the plots (over which rights are proposed to be compulsorily acquired and temporary possession is proposed to be taken) comprise an operational railway line, or is in respect of railway or equipment or is in respect of a restriction on title against disposition by reason of the same;2) unless NR has the ability to require its prior consent and/or require the Applicant to enter into an asset protection agreement prior to the acquisition of such rights/temporary possession in order to ensure any such rights can be carried out in harmony with the operational railway (as is provided for in provision, the compulsory acquisition of such rights/temporary use would be adverse to the operational railway and would cause a serious detriment to the carrying on of NR's undertaking as it could interfere with the operational railway line and the safe running of trains out of Network Rail's control; and	

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		<p>3) as this is an operational railway line such detriment cannot be made good as the line cannot be relocated to other land in the possession of NR (and not least to say requiring NR to relocate its operational railway to facilitate such rights would be entirely disproportionate both in cost and nature).</p>	
REP1-021/19	S.127 of the Planning Act 2008	<p>Accordingly, in order for such proposed compulsory acquisition and temporary possession of the plots referred to at Appendix 1 below to satisfy the test in section 127 Planning Act 2008, paragraph 4 of Network Rail's standard Protective Provisions (and particularly paragraph 4(1) requiring NR's consent to be sought before powers authorising the compulsory acquisition of such rights are exercised) must be included in the draft Order. Network Rail's position is that in the absence of their Protective Provisions, the test in section 127 is not satisfied.</p>	
REP1-021/20	S.138 of the Planning Act 2008	<p>Network Rail is investigating the extent of rights and restrictions for the benefit of Network Rail which are proposed to be extinguished in delivering the proposed development. On this basis, Network Rail reserves its position in regards to whether or not the test in section 138 of the Planning Act 2008 is satisfied. Network Rail hopes to confirm its position on these matters within the next 28 days.</p>	<p>This comment is noted by the Applicant and will engage with Network Rail further with respect of this comment once Network Rail's position is made known.</p>

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REP1-021/21	Appendix 1) Permanent Acquisition	<ol style="list-style-type: none">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);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);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);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);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	This comment is noted by the Applicant.
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		<p>(Rose Street), adjoining public highway (Gainsborough Road), Sturton Le Steeple, Retford (Plot 5-005);</p> <p>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);</p> <p>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);</p> <p>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);</p> <p>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</p>	
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		<p>Burton power station, buildings, pylons, overhead electricity cables, east of public highway (Gainsborough Road), Sturton le Steeple, Retford (Plot 5-012);</p> <p>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</p> <p>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).</p>	
REP1-021/22	Appendix 2) Protective Provisions for the benefit of Network Rail	Full document within 19. Written Representations by Network Rail Infrastructure Limited in relation to The Steeple Renewables Project 202[*] (DCO) document.	This comment is noted by the Applicant.

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Table 2-4: Fields for Farming – Biodiversity

ID	Theme	Verbatim Comment	Applicant Response
REP1-024/1	Exec Summary	Fields for Farming (FFF) submits that the Steeple Renewables Solar Project presents a high and unmitigated risk of significant biodiversity harm. Large-scale solar infrastructure of this magnitude cannot be delivered without extensive habitat disturbance, species displacement, and long-term ecological degradation. The scale and duration of the build, with countless contractors on site, will cause devastation.	The key points of the objection's executive summary are addressed below.
REP1-024/2	Exec Summary	FFF identifies serious deficiencies in the ecological baseline and survey methodology. In addition, the applicant has not provided a credible mitigation strategy, nor has it provided a credible or enforceable pathway to biodiversity gain, to protect the many at risk species.	
REP1-024/3	Exec Summary	Extensive evidence from comparable large-scale solar developments indicates systemic failure to deliver the biodiversity benefits often claimed. Considering the cumulative development pressure in the region, the risk of disproportionate biodiversity loss is high.	
REP1-024/4	Exec Summary	We therefore urge the Examining Authority to require substantive, enforceable ecological evidence and commitments	

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		<p>before any approval is granted, and to refuse the application if these requirements cannot be met.</p> <p>The key points of our objection are outlined below.</p>	
REP1-024/5	Unprecedented large-scale solar infrastructure	<p>There is one 500MW-plus solar project in operation. The Cleve Hill Solar Project in Kent. There was strong opposition from various groups, including CPRE Kent & Kent Wildlife Trust & numerous complaints & difficulties during its construction & ongoing. At this site, there is little sign of the promised biodiversity improvements, evidenced by the images produced by residents & concerns discussed with us by the General Manager of CPRE Kent [1]. Research shows that concerns are increasingly being raised about the performance of current 300 to 500MW solar projects in general in terms of biodiversity improvement.</p> <p>Therefore, it is not proven that large-scale solar infrastructure in the countryside will enhance biodiversity, despite the claims by this applicant. FFF believes that the risk to the countryside & its wildlife is too great, especially when taking into account the cumulative impact of other projects in the area. We urge the inspectors to err on the side of caution & reject this development. The U.K. needs to develop a different strategy to reach the targets of carbon zero. The National Policy Statement for Renewable Energy Infrastructure (EN-3) requires the 'avoidance of significant biodiversity harm & compliance with the mitigation</p>	<p>The Scheme will include areas managed specifically for biodiversity, as well as new and retained green corridors (hedgerows, extended field margins) that will also be managed for biodiversity. These areas are set out in the Ecological Mitigation Areas and species rich grassland seed mix locations shown on Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160], which will be implemented in line with Requirement 6 of the dDCO [APP-041], and monitored in line with Requirement 7 of the dDCO [APP-041].</p> <p>Solar Energy UK's annual monitoring publications (e.g. Solar Energy UK (2025) <i>Solar Habitat 2025: Ecological trends on solar farms in the UK</i>) demonstrate that that solar sites managed for biodiversity support greater mean plant species richness, greater invertebrate species richness, and greater bird species richness than solar sites that are intensively managed. In addition, Montag et al. (2016, <i>'The effects of solar farms on local biodiversity: a comparative study. Clarkson and Woods and Wychwood Biodiversity'</i>) highlighted that well-managed solar farms could support a broader range of species compared to traditional agricultural land .</p> <p>The Solar Energy UK study cited above sampled 248 solar sites to date, that they consider "generally representative of solar farms across the UK in terms of</p>

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		<p>hierarchy' [2]. The harm to nature in this case will outweigh the benefits to the nation that the applicants claim.</p>	<p><i>age, output and geography</i>" and therefore the sampled sites are mostly smaller than the Proposed Development.</p> <p>Larger solar developments, such as this Scheme, allow for larger scale biodiversity benefits – and provision of bigger and more joined up habitats. For example, the sites sampled by Solar Energy UK did not include any solar farms that had ca. 200ha of dedicated biodiversity mitigation areas, and an additional 40 ha of green corridors, as is proposed for the Scheme. The proposed development allows 100ha for the Eastern Biodiversity Mitigation area, 60 ha and 20 ha for the two parts of the Western Biodiversity Mitigation Area, and 20 ha of greenspace in the centre of the development, as well as green corridors of 30 ha (for pipeline/cable corridor) and 10 ha (for a separate cable corridor).</p>
REP1-024/6	Growing evidence of failures	<p>The Planning Inspectorate's report highlights concerns about how solar farm developments impact wildlife & recommends further research to understand ecological impact [3]. In addition, in a decision letter by (section 62a Application, reference s62A/2022/0011) for a proposed solar farm, he refuses the application in part due to the loss of territory for skylark & other red-listed birds. Steeple Renewables' own ecology report notes that only 55% of territories will be mitigated, & species will decline.</p>	<p>The Planning Inspectorate report cited by FFF (https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010118-000503-Biodiversity-and-Solar-Farms-Dec-2020-10809-3.pdf) was prepared for examination of the Longfield's Solar Farm DCO application; it was written in 2020 and was based on information available at the time. It concluded that there was a lack of evidence relating to the effects of solar farms on biodiversity, and identified that research was required before consenting large scale solar farms at areas of ecological value (such as SSSIs, ancient woodlands). Chapter 7 - Ecology and Biodiversity [APP-065] confirms that the Proposed Development avoids impacts to SSSIs and ancient woodlands. It is noted that the Longfield's Solar Farm was subsequently consented by the Secretary of State in June 2023, with the Examining Authority's Report of Findings and Conclusions concluding that: "while I note there is relatively limited data available on the long-term effect of large scale solar on biodiversity, the</p>

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			<p>assessments indicate that the Proposed Development is likely to result in a significant beneficial effect on biodiversity." and concluded that the benefits could be secured by the proposed DCO requirements.</p> <p>In addition to this conclusion, significant research has been conducted since 2020; such as the Solar Energy UK monitoring reports, work by the RSPB and Cambridge University (<i>Bird Study- 2025, Volume 72, Issue 3 pages 217-222</i>), and the Tinsley et al. (2023) article cited by FFF.</p> <p>With regard to the Planning Inspectorate's <i>Decision Notice and Statement of Reasons for Section 62A Planning Application: S62A/2022/0011 Land East of Pelham substation, Maggots End Manuden</i>, the application did not have a legal mechanism (such as lease over the land or section 106 agreement) to secure any mitigation or compensation for ground-nesting birds. It was for this reason that the inspector viewed the application as offering no compensation for skylark. This is not the case for the Steeple Renewables Project, where ca. 200ha of land has been included in the application area specifically to provide compensatory habitat for biodiversity, including large areas of compensatory habitat for skylark. This is in addition to areas within the main body of the panel areas which will also provide such habitat. In total it is conservatively estimated that up to 71% of the displaced skylark territories will be replaced.</p>
REP1-024/7	Growing evidence of failures	The applicant RES has developed other smaller-scale solar projects, & local communities have raised concerns. For example, at Banwell Solar Park (Somerset), Tuddenham Solar Park (Suffolk) & Tilley Solar Park (Shropshire), the local parish councils	The Applicant is unaware of any such reports on its other projects.

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		report that the applicant failed to deliver on expected biodiversity mitigation.	
REP1-024/8	Growing evidence of failures	<p>Several other reports highlight how previous solar developments have seriously impacted wildlife on many levels:</p> <p>CPRE - points to numerous studies showing the negative impact on priority species from large-scale solar [4].</p>	<p>The report '<i>Impacts of solar farms on biodiversity: a roundup of the research</i>' May 2025 has been cited by FFF.</p> <p>This report provides an inaccurate summary of a literature review completed by BSG Ecology in 2019. CPRE incorrectly say that bats mistake PV arrays for water and that pups are at high risk of this effect (though it is noted that pups primarily get hydration from their mother's milk). The study by BSG Ecology concluded that there was no evidence to suggest that the findings of laboratory studies could be applied to PV panels at solar farms.</p> <p>The report cites Tinsley <i>et al.</i> (2023) and concludes that mitigation should be designed into solar sites, and activity monitored. BSG Ecology provide a review of Tinsley <i>et al.</i> (2023) and how it applies to solar farm developments (available at: https://bsg-ecology.com/bats-and-solar-farms/, written January 2024). The Applicant has employed the key points from this review during the baseline surveys and project design input. For example – refer to the bat activity survey methodology within ES Appendix 7.7 Bat Report [APP-109], which has employed the use of 'paired' static bat detectors to accurately monitor bat activity within the areas that may have PV arrays in future (i.e. the field centres what will be impacted). The recommended mitigation measures (such as incorporating landscape buffers to important commuting/foraging features and enhancing such features), have also been incorporated into the Proposed development, and will be secured through Requirement 6 (LEMP) of the DCO.</p>

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		<p>The report also cites other studies that are not strictly comparable with the Proposed Development. For example, referencing a solar project that was constructed on a Site of Special Scientific Interest, which is not the case for the Proposed Development, which has avoided impacts to SSSIs (refer to paragraph 7.6.24 of Chapter 7 - Ecology and Biodiversity [APP-065]).</p> <p>The report also references a literature review on the effect of electromagnetic frequencies (EMF) on bats, and research from 2007 on the effects of radar installation on bats. These do not relate to solar farm infrastructure. The Bat Conservation Trust (BCT) provided a review of '<i>The potential impact of radio frequencies and microwaves on wildlife</i>' (prepared in 2011). However, this review was written in the context of mobile and wi-fi masts. It appears that little or no research into the EMF effects of solar infrastructure has taken place since the BCT's review. It is noted that inverter stations, which convert DC current to AC current and have some of the greatest potential to produce EMFs, and these are mostly located in field centres and areas where baseline bat activity is lower. Refer to Table 3.35 of ES Appendix 7.7 Bat Report [APP-109], which shows that static bat detectors placed in the middle of a field contributed 0-1% of all bat calls recorded. Therefore, any potential displacement effects from converter locations on the bat assemblage is likely to be negligible.</p> <p>The CPRE report also cites studies relating to the impacts of displacement effects on insects and breeding birds. ES Chapter 7 - Ecology and Biodiversity</p>
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			<p>[APP-065] provides an assessment of the likely effects to terrestrial invertebrates and breeding birds.</p>
REP1-024/9		<p>Game & Wildlife Conservation Trust - a submission to the parliamentary committee inquiry into solar installations highlighted concerns about barrier effects & fragmentation, affecting hare, deer, & ground nesting birds [5] .</p>	<p>The Game & Wildlife Conservation Trust's written evidence submission to the Environmental Audit Committee (https://committees.parliament.uk/writtenevidence/114005/pdf/, dated December 2022) does not appear to mention barrier effects, fragmentation, hare, deer, or ground nesting birds. The Trust's written evidence acknowledges the potential wildlife benefits of solar installations, when managed correctly, and highlighted the need for improved guidance on this.</p> <p>The potential fragmentation effects arising from the proposed development have been assessed within ES Chapter 7 - Ecology and Biodiversity [APP-065] and it concluded that with the embedded mitigation of retaining hedgerows and installing mammal gaps in fences, no significant adverse effect is anticipated.</p>
REP1-024/10		<p>Tinsley et al (2023) - showed that bat numbers significantly decrease over & around solar projects [6] .</p>	<p>Please refer to the commentary on Tinsley et al. (2023) provided above. The findings of the Tinsley study have been taken into account in the design of the baseline bat surveys, and when designing measures into the project layout for bats.</p>
REP1-024/11		<p>CPRE - concluded 'most solar farms disrupt wildlife habitats & connectivity, although there are best practice examples that secure biodiversity gains & combine farming, they are not commonplace'.</p>	<p>The Campaign to Protect Rural England has published several documents:</p> <ul style="list-style-type: none">• <i>Getting Solar off the ground</i> (July 2025) states that "<i>Most large, security-fenced solar schemes disrupt wildlife habitats and connectivity – including through increased light pollution</i>" but does not provide any examples, evidence, or references on this point. Section 7.7 of Chapter 7 - Ecology and Biodiversity [APP-065] describes how connectivity will be retained throughout the Site, and how protected/notable species

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			<p>will be protected. These commitments will be secured through Requirements 6 (LEMP) and 7 (CEMP) of the DCO.</p> <ul style="list-style-type: none">• <i>Principles for ground-mounted solar done well</i> (March 2025) does not cite any studies that show a negative impact on priority species from solar projects, but sets out key principles that should be applied to solar projects. The Proposed Development aligns with the biodiversity principles outlined by CPRE (i.e. Principle 4 – avoid irrereplaceable habitat loss, and Principle 11 – deliver genuine biodiversity net gain). Further information on these commitments is provided in ES Appendix 7.12 Biodiversity Net Gain [APP-114], the outcomes of which will be secured by Requirement 7 (LEMP) of the DCO.• <i>CPRE response to the Planning of Energy Infrastructure NPSs</i> (June 2025). This does not provide details of negative impacts on biodiversity. It cites a report by The Royal Town Planning Institute (<i>Are developers in England delivering ecological enhancements required by planning permissions?</i>, May 2025). The Royal Town Planning Institute report summarises an audit of new development sites, which showed that biodiversity features specified within the planning applications failed to be wholly delivered. However, this report is based on an evaluation of residential projects (42 housing estates), and does not consider renewable energy projects. Biodiversity enhancements for the Proposed Development will be secured through Requirement 6 (LEMP) of the DCO. This requires the LEMP to be prepared and implemented in accordance with the outline Landscape Ecology Management Plan (oLEMP) [APP-116], which includes a framework for corrective actions should biodiversity targets fail to be met.
REP1-024/12		RSPB - concerns raised at Burton Mere Wetlands Reserve SSSI, due to non-compliance with the habitat management plan at	The cited Deeside.com (2023) news article provides a story on a 'Deeside Solar Park' planning application to extend the operating period of the solar park from 25 years to 40 years. This is inferred to relate to Flintshire County Council

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		<p>Deeside Solar park. The RSPB is attempting to take over the management of the mitigation area [8].</p>	<p>planning application FUL/000955/23 for Shotwick Solar Farm. The application to vary a planning condition (for the original planning permission ref: 051772) was registered on 01 November 2023. The proposed variation was ‘<i>No generation of electricity... shall take place after 40 years...</i>’ rather than ‘...after 25 years...’</p> <p>The RSPB provided comment regarding the 19 ha of mitigation land associated with Shotwick Solar Farm, as the land is close to RSPB’s Burton Mere Wetlands Reserve and has wetland bird interest. RSPB commented on the management practices (such as failure to sow oil-seed rape, and stating that wildfowl shooting was taking place, which was not in accordance with the Habitat Management Plan). It is noted that Flintshire County Council granted the application on 15 October 2024, with a planning condition to provide an updated Biodiversity, Habitat & Landscape Management Plan that included the removal of shooting rights over part of the Site.</p> <p>Regarding the issue of ensuring management plans are implemented, biodiversity enhancements for the Proposed Development will be secured through Requirement 6 (LEMP) of the DCO. This requires the LEMP to be prepared and implemented in accordance with the outline Landscape Ecology Management Plan (oLEMP) [APP-116].</p>
REP1-024/13		<p>Carvalho et al (2025) - showed that plant growth & biomass were significantly reduced beneath solar panels as soil becomes impacted & has poor soil health compared to adjacent pastures [9].</p>	<p>This study compares soil parameters and plant cover from samples taken directly under PV arrays, and from the gaps between PV arrays, and also compares each to a control (pasture). It shows that plant cover is generally</p>

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			<p>lower directly under PV arrays, compared to 'between arrays' and the control sites.</p> <p>The article says land between PV arrays is generally similar to the control site (pasture), '<i>suggesting no deterioration of ecosystem functioning in solar farms if converted from agricultural land</i>'.</p> <p>However, the Applicant has acknowledged that land under PV arrays may be less diverse than areas around arrays. For this reason, the Applicant has proposed that land within the security fencing will be managed as 'modified grassland' habitat (refer to Feature 2 within the oLEMP [APP-116]) rather than a richer form of grassland.</p> <p>Modified grassland habitat generally has better plant diversity and less impact on soil health compared to cropland, which is currently found over much of the Site.</p>
REP1-024/14	Lack of records & ecological survey inadequacies	FFF has been in contact with county wildlife recorders & the Notts Biological & Geological Record Centre. The NBN Atlas (the largest UK database for species & habitats) has also been studied, and there is a clear lack of up-to-date records from the area to be affected. This is not due to the absence of species but most likely because the area is not regularly visited. However, local people are aware of the prevalence of many legally protected species, for example, a huge linnet flock is regularly seen feeding and roosting (a red-listed species).	<p>The applicant purchased local ecological records from Nottinghamshire Biodiversity and Geological Records Centre (NBGRC) and Lincolnshire Environmental Records Centre (LERC) in March 2024. NBN Atlas precludes commercial use of many of its records (such as in ecological reports of the type commissioned by the Applicant) meaning that such records are not referred to in the application documents.</p> <p>FFF highlight that there are fewer records of notable species than they expected for the Site. The Applicant acknowledges that the absence of data does not equate to the absence of species. The Applicant has undertaken site-</p>

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REP1-024/15	Lack of records & ecological survey inadequacies	FFF has encouraged reporting, which led us to discover process failures whereby sightings are approved & uploaded onto the database.	specific ecological surveys to minimise the data gap (refer to the ecological baseline survey reports ES Appendices 7.3 to 7.11 [APP-105] to [APP-113]). The large flocks of linnet <i>Linaria cannabina</i> were recorded during the wintering bird surveys undertaken by the Applicant, in both the proposed solar area and the eastern biodiversity mitigation area – and reported in Appendix 7.6: Wintering Bird Report [APP-108] and subsequently accounted for in the impact assessment (see paragraphs 7.8.126 to 7.8.139 of ES Chapter 7 - Ecology and Biodiversity [APP-065]).
REP1-024/16	Lack of records & ecological survey inadequacies	The applicant's ecology surveys reveal important species. FFF fears habitat loss, species displacement & inadequate mitigation, the details of which have been deferred by the applicant until approval of the DCO - too late for commentary.	The impacts of habitat loss and species displacement have been assessed in ES Chapter 7 - Ecology and Biodiversity [APP-065] . Details of mitigation have not been deferred until approval of the DCO – these are provided in ES Chapter 7 - Ecology and Biodiversity [APP-065] . The ES also refers to greater detail for species protection measures in the Appendix 4.1: outline Construction Environmental Management Plan (oCEMP) [APP-089] , and Appendix 4.2 Outline Decommissioning Plan [APP-090] ; and measures for biodiversity enhancements in the oLEMP [APP-116] . Requirements 6 and 7 of the dDCO ensure that the authorised development cannot commence until the CEMP and LEMP are approved by the local planning authority for that phase of works (i.e. after the DCO is approved) and that these must align with the oCEMP and oLEMP submitted. Requirement 21 requires an updated decommissioning plan to be approved in advance of any decommissioning, which must align with the submitted Outline Decommissioning Plan.

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REP1-024/17	Lack of records & ecological survey inadequacies	<p>The following are examples of deficiencies in reporting by the applicant:</p> <p>Brown hares - Not surveyed & reported despite an extensive presence across the project area. Listed as a PRIORITY SPECIES under the UK 2024 Biodiversity Framework. We ask the examiners to require the applicant to address this issue.</p>	<p>Hares are a "Section 41" species identified through the provisions of the Natural Environment and Rural Communities Act, 2006. (a "species of principal importance for biodiversity in England"). The S41 list is used to guide decision-makers in implementing their duty under Section 40 of the NERC Act, to have regard to the conservation of biodiversity in England.</p> <p>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 targeted survey for the species was not identified (paragraph 8.2.51 of Appendix 1.1 Steeple Project Environmental Impact Assessment Scoping Report [APP-077]). This was because measures to ensure the long-term presence of brown hares were built into the project design (tussocky grassland, etc), with simple measures such as mammal gaps in fences permitting continued movement around the site, which would avoid the impact of long term displacement. There was thus no real likelihood of a significant effect on the species arising, meaning that it was appropriate to scope targeted surveys out of the process.</p> <p>Brown hare was regularly recorded incidentally within the Site, typically within arable fields and on grassland field margins, and an assumption of widespread presence was made at the impact assessment stage (paragraph 7.6.180 of in ES Chapter 7 - Ecology and Biodiversity [APP-065]).</p> <p>The conclusion of the impact assessment, taking all the measures into account, and making an assumption of widespread presence, is that no significant adverse effect on brown hare is likely to arise.</p>
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REP1-024/18		Badgers - Applicant report (ES Appendix 7.8) initially publicly available IN ERROR (as was the Barn Owl Survey). Badgers are legally protected under the Protection of Badgers Act 1992 , which requires the avoidance of disturbance to setts & habitats. The applicant's report has incomplete survey coverage, outdated data, limited mitigation details, unclear sett classifications, & report inconsistencies.	The need for a licence is considered within ES Chapter 7: Ecology and Biodiversity [APP-065] . A badger development licence is likely to be required for temporary impacts to a small number of setts. Table 1 part 7 of the Consents and Agreement Position Statement [APP-181] confirms that the Applicant proposes to submit a draft badger licence application to Natural England. The draft licence application will assess the realistic worst-case impacts to badgers and their setts to identify the activities that may require licence and agree appropriate mitigation so that Natural England may issue a Letter of No Impediment regarding protected species licencing.
REP1-024/19		Barn owls - Applicant report (ES Appendix 7.5). Schedule 1 protected under the Wildlife & Countryside Act 1988 . A licence is required before any development. An Ecological Survey should be reproduced. Known nests were not identified & during construction, nests should be avoided. Population estimates are inaccurate.	Based on the proposed layout and mitigation/avoidance measures, no offence in respect of barn owls is anticipated, and therefore no licenses relating to the Wildlife and Countryside Act 1981 (as amended) would be required. For barn owl, this is because measures to avoid disturbance of breeding barn owls are incorporated into the construction methods (refer to Table 3.3 of the oCEMP [APP-089]). Surveys have been undertaken in line with methods outlined in industry guidance for 'stage 1' surveys (Shawyer, C. R. (2011). <i>Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment: Developing Best Practice in Survey and Reporting</i> . CIEEM, Winchester.). Paragraph 2.17 of Appendix 7.5 Barn Owl Report (Confidential) [APP-107] provides a rationale for not undertaking further presence/likely absence surveys for active barn owl nests at the DCO application stage.

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REP1-024/20		<p>On-site foraging habitats - Applicant fails to evaluate the cumulative impact of habitat loss, which reduces food availability & impacts survival and/or breeding success for the numerous listed bird species. The mitigation for Skylark & Lapwing in particular is woeful, with the ecologists even acknowledging that all nesting sites will be lost & there will be around 50% loss of skylark.</p>	<p>Cumulative effects on skylark are assessed. For further information on how impacts to biodiversity have been assessed, refer to ES Chapter 7 - Ecology and Biodiversity [APP-065].</p> <p>The dedicated skylark compensation 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.</p> <p>Further information has since been provided in response to Nottinghamshire County Council (Applicant's Comments on Relevant Representations [REP1-008]), which shows that other habitats across the site are also likely to contribute to additional compensation for skylark, such that an estimated 60 - 71% of the displaced territories will be compensated. This is a conservative estimate.</p>
REP1-024/21		<p>Bats - Applicant report ES Appendix 7.7. Bats are protected under the Wildlife & Countryside Act 1981 & as a European Protected Species (EPS) under the Conservation of Habitats & Species Regulations 2017. Surveys do not include emergence/re-entry surveys for trees & buildings identified as having moderate or high bat roost potential. This is contrary to the Bat Conservation Trust's Good Practice Guidelines (Collins 2023). The risk of disturbing or destroying a legally protected bat roost remains unacceptably high.</p>	<p>Figure 2.1 of the Bat Conservation Trust Good Practice Guidelines (4th edition) indicates that no further bat surveys, such as bat 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) for their bat roosting potential, 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 and are retained and protected. Sufficient survey effort has been applied in line with the Bat Conservation Trust Good Practice Guidelines.</p> <p>Static detector surveys were deployed across 521 nights, between 16 locations and seven survey periods between April and October 2024 (refer to ES Appendix</p>

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			<p>7.7 Bat Report [APP-109]). This equates to thousands of hours of monitoring, for which favourable weather was generally encountered. Full weather details are provided in ES Appendix 7.7 Bat Report [APP-109], which also provides consideration of potential limitations to the surveys. It concludes that the variable weather and partial gaps in data recording did not present a significant limitation to the assessment.</p> <p>The ES Appendix 7.7 Bat Report [APP-109] confirmed that eight barbastelle bat <i>Barbastella barbastellus</i> passes and 12 passes of Natusius' pipistrelle <i>Pipistrellus nathusii</i> were recorded throughout 2024 (equivalent to 0.002 and 0.003 passes per hour across the whole season respectively). The report sets out why there is low likelihood of roosts of barbastelle or Natusius' pipistrelle within the Site. No impacts on barbastelle or Natusius' pipistrelle roosts are predicted (and therefore no bat licence is required). The Proposed Solar Area is not considered likely to be an important habitat resource for either species. The purpose of Annex II of the Habitats Directive, is to direct member states of the EU to designate, protect and manage core areas for the listed species (Special Areas of Conservation). The low level of activity indicates that the Site is not a core area for the species.</p>
REP1-024/22	Lack of records & ecological survey inadequacies	Cumulative impacts from adjacent developments & lack of acknowledgement of connectivity - this oversight is inconsistent with the requirements of the Environmental Impact Assessments Regulations 2017, which mandate consideration of combined effects on protected species & habitats. Given the number of developments in the area, there is reduced availability of habitat	A cumulative impact assessment is provided in ES Chapter 7 - Ecology and Biodiversity [APP-065] which is consistent with the requirements of the Environmental Impact Assessments Regulations 2017.

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		for displaced species to retreat to. All species will be affected by lighting, noise & habitat fragmentation.	
REP1-024/23	Lack of records & ecological survey inadequacies	Overall, the surveys are of poor quality, even demonstrating a lack of proofreading (OCR errors, truncated text, e.g. on pages 1, 4 & 15), compromising credibility & resulting in a lack of confidence in the applicant's ability to support the project.	The Applicant has responded to each of the points raised above.
REP1-024/24	Lack of future adherence to mitigation agreements	If the baseline for understanding the biodiversity of the area is an underestimate, we query how biodiversity gain can be effectively improved. It will be easy for the applicant to claim enhancement. We are especially concerned that Bassetlaw District Council (BDC) has made no formal response & was not present at the initial hearing meetings. It is BDC who will be responsible for monitoring the LEMP. Due to resource issues, it seems they will be unable to meet their responsibilities.	The landscaping and Biodiversity Gain will be implemented in line with Requirement 6 of the DCO [APP-041] . The oLEMP [APP-116] allows for monitoring and reporting against the biodiversity objectives by an appointed Ecologist, and for the Applicant to undertake corrective action where objectives are not being met. Bassetlaw District Council's ecological officer was involved in pre-application consultation with the Applicant (see Table 10 of the Consultation report [APP-044]) and has had input into the general biodiversity gain targets that have been incorporated into the oLEMP [APP-116] .

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REP1-024/25	Recommendations made by Notts Wildlife Trust	<p>Notts WT submitted a submission to the inspectorate, but FFF has concerns that they didn't show sufficient scepticism as to how likely the applicant will be to affect their recommendations. Their response was detailed & complex, e.g. 'the developer should employ a qualified grazing ecologist & an ecological clerk of works'. However, will there be local tenant farmers left to engage? Notts WT advises beetle banks as well as field margins, lapwing plots & allowing wet woodland areas to be away from scrapes. These are just a few of the enhancement examples that the applicant failed to identify.</p> <p>If the project is approved, we hope that this advice is written into the LEMP & measures are taken to monitor & enforce. It is noteworthy that the specialists employed by the applicant needed to be corrected.</p>	<p>Beetle banks, field margins, localised wet woodland, and creation of scrapes were identified by the Applicant and included as part of the proposed landscape enhancements submitted with the application (refer to Figure 6.9 Landscape and Ecological Mitigation Strategy [APP-160] and 'Feature 10: Floodplain Grazing Marsh and Lake' and 'Feature 11: Arable Land' in the oLEMP [APP-116]). No correction of the oLEMP is required in order to include these.</p> <p>Regarding lapwing plots, since the Proposed Development will not result in residual adverse impacts on lapwing (as the species was only present in the Eastern Biodiversity Mitigation Area, which will not be subject to development impacts), further mitigation measures in the form of lapwing plots are not considered necessary (Chapter 7: Biodiversity and Ecology [APP-115]). Notwithstanding this, species such as lapwing and curlew are likely to benefit from the proposed changes in the Eastern Biodiversity Mitigation Area as more habitat structure and diversity will be introduced.</p>
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Table 2-5: Fields for Farming – Landscape and Visual

ID	Theme	Verbatim Comment	Applicant Response
REP1-025/1	Introduction	Fields For Farming (FFF) considers that the Applicant, in written (Environmental Statement) and verbal (Responses during ISH1) submissions, exhibits several deficiencies and weaknesses that undermine the application particularly in understating impacts on sensitive local receptors, over-relying on optimistic	The Applicant considers that its Landscape and Visual Assessment [APP-064] aligns with requirements in legislation and policy.

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		<p>mitigation assumptions and minimising cumulative effects in a landscape already saturated with energy infrastructure. These issues align with common critiques in NSIP examinations, where the Planning Inspectorate has emphasised the need for “robust and defensible” assessments that fully address local sensitivities (Planning Act 2008, s.104; see also NPS EN-1, para 4.2 on decision-making criteria).</p>	
REP1-025/2	Introduction	<p>FFF simply cannot agree that the assessment made by the applicant that there is “no significant effect, no cumulative impact”, and not with their view that in this case moderate is insignificant, moderate should be significant (echoed by Nottinghamshire County Council [Notts CC]).</p>	<p>Whilst the LVIA identifies no significant cumulative landscape and visual effects a full cumulative assessment established across the environmental statement is summarised in Chapter 18 (Summary) [APP-075] and concludes a number of significant cumulative effects.</p> <p>The methodology for the identification of significant effects was explained in full in Section 6.3 of the LVIA [APP-064]. In summary, an assessment was made as to the level of effect by combining a judgement on the sensitivity of the receptors and the magnitude of the impact. Effects were set out on a 5 point scale from Major to Minor. Effects which were identified to be ‘Major’, ‘Major-Moderate’ and in some cases ‘Moderate’ were identified as being Significant</p> <p>GLVIA3 notes at paragraph 3.32 that <i>‘There are no hard and fast rules about what effects should be deemed ‘significant’ but LVIA should always distinguish clearly between what are considered to be the significant and non-significant effects’</i>. This is done in the LVIA, which clearly notes which effects are significant and which are not.</p> <p>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 <i>‘often summarised</i></p>

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			<p><i>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 the nature size and location of the proposed development</i>'. 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.</p> <p>In August 2024 the Landscape Institute issued a Technical Guidance Note [reference LITGN-2024-01] titled 'Notes and Clarifications on aspects of the 3rd edition of the Guidelines for Landscape and Visual Assessment (GLVIA3)'8, which included some errata in relation to GLVIA3. It is of note that the Technical Guidance Note reiterates that the purpose of LVIA is '<i>to explain which aspects of landscape and visual change are more important to the decision to be made (and why). Achieving this outcome is more fundamental to good LVIA than the detailed mechanics of specific assessment methodologies</i>'. The LVIA has indeed explained which aspects are most important to the decision in line with this guidance.</p>
REP1-025/3	Viewpoints and photo Montages	<p>The Oxford English Dictionary defines a viewpoint as "A place from which the surrounding landscape or scenery can be viewed or observed". In the main, the locations chosen are not viewpoints, they are simply points along a route chosen not to highlight the views and open landscapes. Attached are photographs taken just steps away from the points used by the applicant and they show viewpoints. These were taken by an iPhone 14 Pro by an individual of 170cm in height at eye level and at the centre of the footpath.</p>	<p>The viewpoint photographs included in the LVIA illustrate the views from a series of 26 no. representative locations.</p> <p>The viewpoints represent a range of visual receptors at a variety of distances and directions from the Proposed Development. They also cover a variety of different landscape character types. Each of the viewpoints lie within the Zone of Theoretical Visibility (ZTV) of the Proposed Development, albeit in many instances localised vegetation screening not shown on the Screened ZTV plans</p>

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REP1-025/4	Viewpoints and photo Montages	<p>The applicant's photographs are deliberately misleading and don't give a true reflection of the open, rural and agricultural nature of our landscape. The points chosen are either not representative of the area/route or are not within the red-line of the proposed development. These are not representative and the photographs are deliberately confusing. The applicant did not include a Viewpoint from Retford Road looking towards the River Trent or Sturton Le Steeple, this would clearly show the extent of the development, the open rural landscape and the heritage assets affected. (example Photograph attached).</p>	<p>would serve to limit the potential for any views, as illustrated in the viewpoint photography.</p> <p>Effort was made to agree the locations for the viewpoints and photomontage locations with relevant consultation bodies through the EIA Scoping and PEIR stages, with a request for feedback on the proposed locations included within both the Scoping Report and the PEIR. Very few comments on the viewpoint locations were provided though the EIA Scoping or PEIR stages, with the comments which were received being discussed in Section 6.5 of the LVIA, and related primarily to feedback from the Canal and River Trust who wished to ensure there was appropriate illustration of views from the River Trent.</p>
REP1-025/5	Viewpoints and photo Montages	<p>The applicant took the approach that silence is deemed acceptance with regards to selection of viewpoints. Bassetlaw have not submitted responses and Notts CC have expressed concerns about the selection, and the community was not asked for input at all, surely local knowledge is key in this respect.</p>	<p>The viewpoints are an aide to help inform the LVIA work, but are not the sole basis on which the assessment judgements are made, nor the sole basis on which assessments are reported. The LVIA includes a full assessment of all the relevant visual receptors (properties, settlements, roads, PROW etc) some of which have supporting viewpoints and some of which do not.</p> <p>It is not agreed that the submitted photographs are misleading. Rather they provide a range of views from the landscape in and around the site. It is appropriate for many of the viewpoints to be located outside of the Site boundary in order to help understand what the potential effects might be from locations outside the Site. In this case the viewpoints illustrate locations both within and outside of the Site.</p>
REP1-025/6	Viewpoints and photo Montages	<p>Notts CC and FFF both highlighted the limited coverage of residential receptors that can be classed as highly sensitive particularly around the edges of villages. The applicant's</p>	<p>Residential receptors are appropriately addressed in the LVIA, with assessment provided for both settlements and individual residential properties within the RVAA. Many of the LVIA Viewpoints are also located either within or close to the</p>

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		<p>“moderate” rating is unacceptable and contradicts Bassetlaw Local Plan, Policy 46 and Sturton Ward NP, Policy 5.</p>	<p>nearby settlements, including viewpoints 1, 3 and 6 in relation to Sturton le Steeple and viewpoints 15 and 16 in relation to North Leverton. A high sensitivity was attributed to both settlements and individual residential properties. A moderate visual effect was identified for a small number of residential properties. The matter of compliance with Policy was addressed in the Planning Statement [APP-182], with Appendix D discussing Bassetlaw Local Plan, Policy 46 and Sturton Ward NP, Policy 5.</p>
REP1-025/7	Viewpoints and photo Montages	<p>Nottinghamshire County Council also expressed concern about professional judgement. Professional judgement does not override local knowledge and in this case professional judgement is flawed.</p>	<p>The LVIA was undertaken by a competent practitioner in accordance with recognised guidance and policy.</p>
REP1-025/8	Viewpoints and photo Montages	<p>VP 1A & 1B represent Trent Valley Way – Solar is not proposed in these two fields (these fields are not in the red-line. The site is beyond the farm buildings depicted).</p>	<p>VP1 is illustrated by photography in multiple directions to provide context regarding the view in the direction looking towards the Proposed Development. With this viewpoint, as with several others, much of the development would be screened by intervening vegetation and built form. The viewpoint serves to illustrate that although there is theoretical visibility from this location, the limited height of the solar panels and the intervening vegetation would limit any views.</p>
REP1-025/9	Viewpoints and photo Montages	<p>VP 6a, 6b, 12, 13a, 13b, 14b all show West Burton Cooling Towers in the backdrop, and continue to do so through out, these towers will be gone by 2026/2027. By turning 180 degrees and taking photographs would have given a far better reflection of the area being affected by the development and would have shown how open and rural the landscape and views actually are.</p>	<p>The photography illustrates the view in the direction of the Proposed Development. In many cases the former West Burton Power Station Site can be seen in the background of the view, reflecting its location immediately adjacent to the Site. It is acknowledged that demolition work is proposed at the former power station site, albeit that not all built form is proposed to be removed.</p>

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REP1-025/10	Viewpoints and photo Montages	VP 14a, 17b, 20b clearly shows the impact the development will have on the landscape views towards North Leverton Windmill and setting of this heritage asset. We challenge that VP 20a deliberately excludes the windmill.	There appears to be a misunderstanding of the viewpoint photography for Viewpoint 20. The photography shows a full panorama of the view from north to west, split across three sheets. Photograph 20a shows the view to the north-east, whilst Photograph 20b shows the view to the south-east. The reason that Photograph 20a does not show the angle in the direction of the windmill is because that angle is shown in Photograph 20b where the windmill can be seen.
REP1-025/11	Hedgerows	It is a known fact that established hedgerows have more environmental value than new hedgerows and newly planted hedgerows have little environmental value in year 1 (with no benefit as opposed to what was claimed by the applicant), and start to add value by year 3, have more significant value after 10 years and long-term benefits after 30 years. The applicant places much reliance on volume of hedgerow planted not the quality of the hedgerow nor the time it takes to mature.	It is not agreed that new hedgerow has no benefit in Year 1. The LVIA identifies a minor beneficial effect, which is considered to be a reasonable conclusion. The Applicant is aware of the likely growth rates of the proposed vegetation and has considered these amongst the assessment work set out (refer to LVIA [APP-064] paragraphs 6.8.6 to 6.8.9).
REP1-025/12	Hedgerows	Document: Outline Landscape Ecology Management Plan Document Reference: EN010163/APP/6.3.7 Paragraph: 2.3 Numerous Public Rights of Way (PROW) and permissive paths intersect the Site and are shown on Figure 6.9 Outline Landscape Mitigation Strategy [EN010163/APP/6.4.6]. The maintenance of these has been considered in relation to their influence on habitat condition, for example greater hedgerow cutting frequencies may be needed adjacent to PROW, but management prescriptions for the PROW have not been specified, as they do not have their own ecological objectives.	An Outline Construction Traffic Management Plan was included at ES Appendix 13.2 [APP-129] which includes a PROW Management Plan which covers the construction phase of the Proposed Development. Thereafter, during the operational phase the management of the routes would be addressed through notations on the final Landscape and Ecological Mitigation plans that would be prepared at the detailed design stage and within the updated Landscape Ecology Management Plan.

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REP1-025/13	Hedgerows	<p>It is difficult to determine from the above whether the hedgerows bordering the PROW will be managed or not or indeed in what manner which has an impact on visual assessment outcomes, and how their impact on NBG can be assessed if the management of them is not determined.</p>	<p>LVIA Figure 6.9 illustrates detail of the vegetation within the Site including the vegetation which is proposed to be managed at a height of 3m. It was set out in the oLEMP [APP-116] that the document should be read in conjunction with Figure 9.6</p>
REP1-025/14	Hedgerows	<p>The visual and landscape assessments conclude there is no benefit and this a moderate impact in Year 1, and a moderate to minor impact by year 15, this is simply not true where currently there are 1 to 1.5m managed hedgerows interspersed with gateways and hedgerow gaps that will be allowed to grow to 3m, gaps filled and gateways obscured by solar panels.</p>	<p>It is unclear which assessments within the LVIA this is referring to. However, the LVIA does identify a range of visual effects that would be reduced by Year 15 as a result of the mitigation proposed. For example, LVIA Viewpoint 8, where the visual effect at Year 1 was identified as Moderate and the visual effect at Year 15 was identified as moderate/minor.</p> <p>It is accepted that views of hedgerow vegetation, rather than a more open view, may be considered to be adverse, but it is not considered that such views of hedgerows would be adverse to such a degree that the effect would be considered significant, noting that hedgerows are an established feature of the baseline landscape, already lining many of the footpaths in and around the Site.</p>
REP1-025/15	Hedgerows	<p>There is no contingency for underperformance (e.g. drought/climate impacts) contradicting GLVIA3 standards and with hedgerow removals during construction quoted at 1,070m this also contradicts NPS EN-3 (2023), para 2.10.100.</p>	<p>There is a commitment in the oLEMP to replace any planting which fails up to Year 5. Some very low level of plant failure might occur between year 5 and year 15, but this is far less likely than between Year 1 and Year 5 and nonetheless is factored into the volume of planting included with the proposals and considered in the assessment judgements. Some minor failure of vegetation beyond Year 5 is no different to what might occur naturally to the existing vegetation in the landscape and is also considered as part of the judgements in the LVIA. In reality however, aside from known issues with specific species (such as ash dieback) which are mitigated by avoiding planting of those specific</p>

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			<p>species, there is no reason to suggest that the vast majority of any planting which is performing well by Year 5, will not still be performing well by Year 15.</p> <p>Paragraph 2.10.100 of NPS EN-3 states that: <i>'The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity'.</i></p> <p>It is considered that the Proposed Development complies with this paragraph. The proposed hedgerow removal to facilitate the site access during the construction period would be far outweighed by the proposed new hedgerow and other new vegetation planting.</p>
REP1-025/16	Dynamic Landscape	FFF pointed out that the landscape is dynamic, it changes over the seasons not only in terms of visual aspects due to the crops but also sights and smells. The landscape will become a stagnant ocean of solar panels.	The LVIA judgements are mindful that the landscape is dynamic. For example there are photomontages prepared for both summer and winter vegetation scenarios, provided at Appendix 6.2 [APP-097 and APP-098] .
REP1-025/17	Dynamic Landscape	The applicant confirmed they intend to plant/allow existing hedgerows to grow either side of Trent Valley Way and other PROWs. These hedges will be allowed to grow to 3m high, and it is not clear how often these hedgerows will be maintained. The applicant claims this will still afford pleasant and open views. This is simply not true, the proposed 15m wide routes with 3m hedges will not feel "open and pleasant" in a rural landscape; they create a confined, engineered corridor that fundamentally	<p>The matter of the maintenance of hedgerows is set out in the OLEMP [APP-116] (pages 35 and 36) which discusses timings and frequencies of cutting and other maintenance methods.</p> <p>The Trent Valley Way is already lined by hedgerows on both sides for large parts of its routing in and around the Site. These include the section along High House Road, as the route runs eastwards into the Site, and sections of Springs Lane. Many other PROWs within the Site are also bounded by hedgerows to one or</p>

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		<p>changes the character of the Trent Valley Way and public right of way.</p>	<p>other side. The mitigation proposals include for new planting to either one of both sides to some sections of the Trent Valley Way and other PROW. Where the routes would run within this planting they would remain pleasant in their nature, with the Proposed Development offset from the routes.</p> <p>Given that hedgerows are an established feature of the baseline landscape, already lining many of the footpaths in and around the Site, it is not considered that the mitigation would fundamentally change the character of the routes.</p>
REP1-025/18	Decommissioning and Long-Term Reversibility	<p>Decommissioning is only briefly addressed (ES Table 6.5, p70: “short term... minor effects”), assuming full restoration but without detailed visuals or soil recovery modelling. This glosses over 40-year operational permanence in a reversible landscape.</p>	<p>The potential landscape and visual effects during the decommissioning period are considered appropriately in the LVIA, with the effects summarised in Table 6.5 - Decommissioning Effects.</p>
REP1-025/19	Decommissioning and Long-Term Reversibility	<p>There is no ZTV for the decommissioning phase per GLVIA3 para 5.4 on full lifecycle assessment and the applicant avoids the requirements of the Planning Act 2008, s104(7) where Examination decisions must consider “likely significant effects... including ... decommissioning” and NPS EN-3, para 2.10.96 stating “decommissioning” plans are required to ensure “land can be returned to agriculture”</p>	
REP1-025/20	Cumulative Impact	<p>The applicant claimed that their assessment was mindful of other schemes in the area (10km radius) listing 13 nearby schemes including 5 solar farms and concluded there was significant impact on the Character and amenity. Estimates of 6 to 8 million solar panels across the Trent Valley at this point see a complete landscape shift from agriculture to energy</p>	<p>The LVIA included an assessment of cumulative landscape and visual effects. No significant cumulative effects were identified, in part due to the very localised effects arising from the Proposed Development itself.</p> <p>The assessment identified that the wider landscape would be characterised in part by the presence of solar energy developments, but this would only serve to</p>

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		fundamentally changing the visual landscape and character of the area.	continue the existing presence of energy development in the landscape which is acknowledged in the published landscape character assessments for the area.
REP1-025/21	Cumulative Impact	There will be intervisibility between the projects, especially from Littleborough, Fenton and the high points in North Leverton as well as those looking from the Lincolnshire side of the River Trent towards Cottam and West Burton from A156 and potentially from Lincoln. The applicant has chosen not to include this aspect in its ZTV.	It is not clear which projects are being referred to here. However, it is important to reiterate that unless the Proposed Development is visible as part of the view, then it can't contribute to the cumulative effect which may arise from other schemes.
REP1-025/22	Cumulative Impact	Again, to affirm, the cumulative impact results in the schemes being contrary to Local Plan policies that aim to protect the landscape character of the area. (see Bassetlaw Local Plan 2020-2038, Policy ST49 and Sturton Ward Neighbourhood Plan 2021 – 2037, Policy 2a).	The matter of compliance with Policy is addressed separately in the Planning Statement. Policy ST49 of the Bassetlaw Local Plan 2020-2038 is addressed at page 48 and 49 of Appendix D where it is concluded that the Proposed Development would ' <i>comply with Policy ST49</i> '. Policy 2a of the Sturton Ward Neighbourhood Plan 2021 – 2037 is addressed on page 74 of Appendix D where it is concluded that ' <i>The Proposed Development is therefore considered to comply with relevant parts of Policy 2a</i> '. [Policy parts 2 and 3 are not relevant to the Proposed Development].
REP1-025/23	Cumulative Impact	More locally the applicant argues that the quarry has no impact visually so does not warrant inclusion in the assessment, it is 'in the ground' again, this is not wholly true as there is plant and processing equipment and extraction piles up to 10m high as well as security fencing, lighting and more hedgerow screening.	It is not correct to suggest that the quarry was not included in the LVIA cumulative assessment, as it was one of the schemes considered and this included any above ground elements that form part of the consented development. Nonetheless, it is correct to say that any works beneath level ground level in a largely flat landscape would not be visible from the surrounding landscape.

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REP1-025/24	Cumulative Impact	The applicant has accepted that there are multiple schemes within the 10km Zone of Interest yet concludes no conflict.	The Applicant has not assessed that there is “no conflict”. The cumulative assessment at Section 6.10 of the LVIA [APP-064] identifies a series of cumulative effects which are not significant.
REP1-025/25	Cumulative Impact	FFF acknowledge that energy does currently form part of the landscape, but on a much smaller footprint and those facilities are currently being demolished. Cottam has already gone and the changes are immense (see attached photos).	The matter of energy infrastructure having been an established presence in the landscape over the past 50 years is set out in the published landscape character assessments. It is acknowledged that Cottam power station has been demolished and that demolition is also proposed at Weston Burton. However, the electricity substations remain, with their accompanying electricity transmission infrastructure / pylons remaining present in the landscape. The vertical scale of both the former power stations and the lines of pylons far exceed the vertical height of the Proposed Development.
REP1-025/26	Cumulative Impact	We join Nottinghamshire County Council in having difficulty in understanding how this can be deemed negligible.	The LVIA does not identify a negligible cumulative effect. Rather it identifies moderate, non-significant effects in terms of the combined effects of all the proposals together (LVIA [APP-064] paragraph 6.10.30).
REP1-025/27	Summary	For the reasons given above, and the responses given by the applicant during ISH1, we did not gain any comfort that the landscape and visual assessments have been undertaken adequately and added to our concerns that the impacts have been under stated. Nottinghamshire County Council also echoed these concerns.	The LVIA identifies a small number of localised significant landscape and visual effects, which would reduce in nature by Year 15 as the proposed mitigation planting begins to mature. Such localised significant effects are in line with what would be expected for a development of this nature. The LVIA has been undertaken by appropriate practitioners and in line with the appropriate guidance. Matters raised by Nottinghamshire County Council are addressed separately.
REP1-025/28	Summary	The applicant’s approach here is reflected across the entire project raising the lack of confidence in the ability of the	The Applicant has responded above to the points raised.

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		applicant to deliver such a major project and therefore the application should be declined.	
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Table 2-6: Fields for Farming – Photo's

ID	Theme	Verbatim Comment	Applicant Response
REP1-026	Photos (separate document)	Illustration of panels on first page (blue shading).	The Applicant can confirm this has not been produced by Applicant and is not part of support documentation for the Steeple DCO. The author of the photograph/illustration from the document has not been confirmed. The Applicants position is this photograph is not an accurate representation of what is proposed by the Proposed Development.

Table 2-7: Fields for Farming – Agenda Item 3

ID	Theme	Verbatim Comment	Applicant Response
REP01-029/1	Introduction	This Supplementary Written Representation is submitted by Fields for Farming (FFF), a community group representing the interests of residents in Sturton le Steeple, Fenton, Littleborough, North Leverton, and North and South Wheatley (the “Residents”). It builds upon our initial Relevant Representation (RR-035, dated 28 August 2025) and provides	The Applicant notes this comment.

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		<p>further evidence and analysis on the specific subjects of Principal – item 3 on the agenda of the Issue Specific Hearing on 12 November 2025. It seeks to oppose the application for a Development Consent Order (DCO) by Steeple Renewables Limited (the “Applicant”) for the Steeple Solar Farm and Battery Energy Storage System (BESS) (the “Proposed Development”).</p>	
REP01-029/2	Need	<p>The need for additional low carbon generation is clear, not only to replace the two coal-fired power stations at Cottam and West Burton, now partly demolished, but also to produce power required by the nation without compromising the government strategy of moving towards a net-zero future. This is in line with paragraph 3.15 in NPS3.</p>	
REP01-029/3	BMV agricultural land Brownfield Land	<p>The proposal is to use an area of 1700Ac to produce “up to 400MW” on the original proposal, now reduced by a 10-15% reduction in the active area. In our view, taking this amount of BMV land out of production, permanently is the wrong strategy in the search for a greener future. We would be better served using the existing brownfield site at West Burton to produce power in a more concentrated format and to offer a permanent background in place of intermittent solar power to feed into the grid.</p>	<p>Please see the Applicants common response E (Use of Best and Most Versatile Lane), F (Food Security) and G (Solar Should be placed on roof tops or brownfield land) found on pages 285-287 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP01-029/4	Need	<p>As an example, the power density of Nuclear power is 92% against the 27% of solar. Or, otherwise stated, Ground Mounted Solar uses 19m²/MWh against 0.3m²/MWh for nuclear. This is</p>	<p>Section 5 of the Planning Statement [APP-182] explains the Proposed Development will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during</p>

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		<p>driven by a combination of Capacity Factor, Energy Density and Operational Footprint. Thus, the same power could be generated using the existing industrial or brownfield sites.</p>	<p>and beyond the critical 2020's and 2030's timeframe. Maximising the capacity of the generation in resource-rich, well connected and technologically deliverable proposed location for the Proposed Development represents a significant and commercially rational step towards the fight against the global climate emergency.</p> <p>As part of a diverse generation mix, solar generation contributes to improve the stability of capacity utilisations among renewable generators. When developed alongside other renewable technologies, largescale solar (especially when co-located with BESS) will smooth out seasonal variations in total renewable generation, more closely matching anticipated seasonal levels of demand. Other conventional low-carbon generation (e.g. tidal, nuclear or conventional carbon with CCUS) remain important contributors to achieving the 2050 Net Zero obligation, but their contributions in the important 2020s and 2030's will be very low due the lead in time it takes to develop such infrastructure.</p> <p>As per paragraph 3.2.7 of NPS EN-1, the Proposed Development should be considered on the basis that its need is established, and this urgent need should be given substantial weight in the decision.</p>
REP01-029/5	Need	<p>In addition, the whole process of stepping up to high voltage and distribution losses via the Power Grid network contrast with the solution of siting PV solar on houses and commercial and industrial premises where power can be consumed locally.</p>	<p>Please see the Applicants common response G (Solar Should be placed on roof tops or brownfield land) found on page 287 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP01-029/6	Need	<p>The development and use of SMR has been enthusiastically welcomed by the Secretary of State in his recent speech at</p>	<p>The Applicant notes the referral to SMR. However, SMR's are not expected to be operational until the mid-2030's (at the earliest) and will add to the diverse</p>

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		<p>COP30, and it is interesting to note that the Italian Government, recognising the need to retain good agricultural land has approved a ban on new ground-mounted PV solar installations on productive farmland, following a proper wider consideration of views and evidence from their Ministry of Agriculture.</p> <p>[Sources: Ultimate Fast Facts Guide to Nuclear Energy, US Department of Energy 2019, Ourworldindata Hannah Ritchie June 2022, Mahalik 2023 (Springer.com/article/10.1007/s10098023-02689-8, National Trust Renewable Energy Guidance, Noble Green Energy, energy.ec.europa.eu, worldnuclear.org)]</p>	<p>generation mix the Government requires. SMR's will not replace or make other generation sources (such as solar or BESS) redundant nor prevent them from coming forward for development.</p> <p>How other countries decide to meet their energy requirements is not a material planning consideration for the Proposed Development.</p> <p>Material planning considerations for the Proposed Development, however, does include NPS EN-1 and NPS EN-3. 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.</p> <p>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.</p>
REP01-029/7	Site Selection – Applicants Selection Process	<i>Chapter 3 - Site Description, Site Selection and Iterative Design Process</i> <u><i>Paragraph 3.5.18</i></u>	The Applicant notes the comments about site selection and consideration of alternatives. The Design and Access Statement [APP184] 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

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	<p>“Therefore, to form an effective cluster of PV arrays to generate a similar amount of power as the proposed DCO site, the alternative site search has considered that the following parameters would be required to be an effective comparison to the proposed DCO site area. • 3 x 3 adjoining land parcels of a minimum of 60.7Ha; • Then each cluster being within 5km of one another”</p> <p><u>Paragraph 3.5.20</u></p> <p>“Three sites were identified in this process with potential as alternative site locations. These three sites are labelled as follows</p> <ul style="list-style-type: none">• Site A – land between Worksop and Retford – approximately 1408.3 ha and is located approximately 12.3km from the POC at West Burton A Power Station.• Site B – land south of Gringley on the Hill – approximately 754.5 ha in size and located 5.6km from the POC at West Burton Power Sta on.• Site C – Land around Northorpe - approximately 1159 ha in size and is located 11.5km away from the POC at West Burton Power Sta on. <p><u>Paragraph 35.34</u></p>	<p>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.</p> <p>A search was also undertaken of the potential brownfield land (including rooftops within residential areas) within the prescribed 15km Area of Search from 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].</p>
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	<p>"It is also advantageous to find a site which has few landowners to minimise the complexity which can arise when dealing with multiple landowners as part of the same project. As discussed above for a project of this nature, an area of at least 60.7 hectares under either single or a couple of landownerships was deemed preferable when looking for a suitable site. In addition, it was considered that any such sites of 60.7 hectares would need to be within 5km of one another (due to the Applicant's experience with developing similar projects) and preferably there would be a minimum of 3 such parcels near to each other for them to reasonably form a potential site option." [Source RES Proposal Chapter 3 - Site Description, Site Selection and Iterative Design Process, Document Reference: EN010163/APP/6.2.3].</p> <p>From the above information all from the Applicant's own documentation, it is difficult to determine if the applicant has undertaken a true alternative site assessment. We have previously put forward why this site is no better than the three detailed above, but there does not even appear to be consistency in approach of the alternatives selected. It is purely driven by:</p> <ul style="list-style-type: none">• the connection (which is available to all four of the options as the connection agreement is with the applicant not the land)	
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		<ul style="list-style-type: none">• only having to lay 700m of cable to facilitate the connection• the willingness of a single, absentee landowner to make the land available. <p>In addition, in their presentation, the Applicant indicated that alternative greenfield sites had been considered and discounted. but no mention was made about considering the brownfield sites in and surrounding West Burton and Cottam, specifically the old PFA ash resettlement areas.</p>	
REP01-029/8	Site Selection – The Correct Approach to Land Selection	<p>Under the Government Development Guidance NPS EN-3 PV ground mounted solar should best be sited on brownfield land and poorer quality unproductive land.</p> <ul style="list-style-type: none">• BMV land should be avoided. The 'most compelling evidence' would be required if it was to be used.• The fact that BMV land happens to be available from a (landowner in this case) who wants to abandon farming is not compelling evidence.• The fact that it is difficult to find poorer quality land within the district is not compelling evidence.• Local authority boundaries are not to be used as a limiting factor in the search for alternative options. If there is no poor-quality land within a district the only	<p>The Appeal referred to by the Author is over 10 years old, relates to a 38.43 ha solar park that would generate 10MW of electricity, in a different local authority area, different local plan and was considered under the Town and Country Planning Act 1990. The Planning Inspector determined the location of that Proposed Development had not been justified via a sequential test provided (now known as an alternative site assessment), it failed to maintain or enhance special landscape qualities of the area in that case and conflicted with local plan policy. The inspector also determined that proposal did not accord with the NPPF with regards landscape harm and use of agricultural land. In the planning balance, the inspector determined benefits of that Proposed Development did not outweigh the harm identified.</p> <p>It is not a direct comparison to the Proposed Development that forms a National Significant Infrastructure Project, generating 600MW annually (enough electricity to power 180,000 homes annual (roughly half the homes</p>

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		<p>logical conclusion is that industrial scale solar plants are not the right renewable solution for that area.</p> <p>[Source Comments of Planning Inspector Elizabeth C Ord LLB(Hons) LLM MA DipTUS Appeal Ref: APP/D3505/A/13/2204846 Valley Farm, Wherstead, Ipswich, Suffolk, IP9 2AX 2 June 2014]</p>	<p>in Nottinghamshire)). The Proposed Development is also located in a different authority and assessed against relevant policies from a different local plan.</p> <p>In terms of design evolution, site selection and brownfield land please see previous answer to REP01-029/7.</p> <p>With regards landscape impact, please see the Applicants common response O (Impact on the local landscape) on page 291 of the Applicant Comments on Relevant Representations [REP1-008].</p> <p>Section 104, Planning Act 2008 states that the Secretary of State must decide the application in accordance with any relevant national policy statement.</p> <p>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.</p> <p>Public benefits in this case are also significant, including 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 (one in the north of the site to serve the BESS and Substation and one in the west [AS-009]) 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.</p>
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			<p>As an additional enhancement measure for community benefit, two surface water detention basins are proposed as part of the Proposed Development. These will provide flood risk reduction to the village of Sturton-le-Steeple by intercepting and storing overland flow that currently represents a risk of flooding within the village centre.</p> <p>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.</p> <p>With regards the NPPF, paragraph 5 states "<i>The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework).</i>" Therefore only the alignment of the Proposed Development against the NPPF is assessed.</p>
REP01-029/9	Size Scale Efficiency	At 888 Ha, the overall size of this proposal is such that it completely surrounds the village of Sturton le Steeple and heavily impacts the villages of Fenton, North Leverton and South Wheatley, with a limited impact on the hamlet of Littleborough. And, as noted above, a more compact solution is available using an alternative power source, giving a much better output per area than the 2.67 or 3.84 MW/Ha mentioned. We also note that	Please see the Applicants common response K (General concern regarding the size and scale of the Proposed Development) and L (Scepticism over the efficiency of solar) found on page 288 and 289 as well as O (Impact on the local landscape) on page 291 of the Applicant Comments on Relevant Representations [REP1-008] .

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	Impact on Sturton-le-Steeple Village	the alternative land parcels considered were all smaller at around 550 Ha, and did not completely swamp the villages.	In terms of design evolution, site selection and brownfield land please see previous answer to REP01-029/7.
REP01-029/10	Overall Generating Capacity	No comments to avoid repeating the above arguments	The Applicant notes this comment.
REP01-029/11	Grid Connection	Clearly there is currently capacity for the project as presented to connect to the grid at West Burton Substation. Given the almost inevitable approach of building one or even two SMR units plus possibly another CCGT, for which outline planning already exists, then capacity for all three solutions would potentially exceed that available.	The Grid Connection Statement [APP-056] , sets out the detail of the Applicant's grid connection and the agreements in place with National Grid. The Applicant does not consider that future projects in the vicinity of the Scheme prejudice the Applicant's grid offer.
REP01-029/12	Battery Energy Storage System	The BESS system is required only because the PV Solar arrays are intermittent producers of power, specifically generating most power when it is least needed by the consumer.	Overarching National Policy Statement for energy (NPS EN-1) outlines the important role of energy storage and balancing services in renewable energy generation (see paragraphs 3.3.25-27). NPS EN-3 specifically identifies energy storage as the type of associated infrastructure that may be treated as associated development for solar farms (see paragraph 2.10.16). NPS EN-1 para 4.2.5 includes renewable energy storage infrastructure as Critical National Priority (CNP) infrastructure.
REP01-029/13	Battery Energy Storage System	Although the UK is a major and growing market for battery energy storage solution, growing from 2.8 to 6.8GW in the last three years, there is some controversy surrounding these units, including: <ul style="list-style-type: none">• Degradation◦ traditional generation resources experience degradation in only two dimensions— output and	Solar energy, by its nature, does not respond to demand – it responds to environment. Energy storage addresses the impacts of the inherent intermittency and fluctuations associated with renewable energy generation like solar or wind, maximising the useable output from these energy sources.

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		<p>efficiency. However, storage projects may degrade based on three other performance metrics:</p> <ul style="list-style-type: none">○ degradation with respect to its charging speed (i.e., how quickly a battery can be fully charged)○ battery degradation: The limited economic lifespan of lithium-ion batteries due to cycle count and calendar ageing poses a risk.○ energy loss over the life of the project.● Fire risk: High-profile battery fires globally have increased local scrutiny. These fires are caused by thermal runaway, which can be triggered by short-circuits, physical damage, or manufacturing defects.● Supply chain reliance: The UK relies heavily on imported critical minerals like lithium, creating potential vulnerabilities and affecting cost and availability. <p>We urge the Inspectors to seek detailed responses on these potential problems.</p>	<p>In other words, energy storage works to make the operation of intermittent forms of renewable generation, such as solar, more efficient.</p> <p>The primary purpose of the Battery Energy Storage System (BESS) proposed in this Proposed Development is to take the electricity generated from the solar panels forming part of the Proposed Development in times of low demand when the sun is shining, and send it to the National Grid in times of higher demand. This maximises efficiency. The secondary purpose of the BESS is provide ancillary and balancing services for the National Electricity Grid. This would occur in times of surplus when there is more electricity on the grid than there is demand (i.e. times of low demand).</p> <p>The proposed associated co-located BESS is appropriately sized to respond to, and support operationally, the Proposed Development.</p> <p>With regards BESS Safety please see the Applicants common response C (BESS Safety and Fire Risk) found on page 284 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP01-029/14	Technology	<p>We understand that the final choice of technology is as yet not decided upon. We would like the Applicant to comment on the difference in spacing and design between the lines of PV array as currently proposed in the application with those that would permit a mixed use, including grazing land within the</p>	<p>The Note on Scheme Efficiency document [APP-185] sets out main design parameters, PV module degradation, panel configuration and land use efficiency.</p> <p>The illustrative design includes 836,808 panels, giving an installed capacity of 548MWp (watt peak) DC with a yield of 529,991 MWh (megawatt hours) per</p>

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		<p>development. As we understand it, the spacing and design for mixed PV and sheep grazing for example is different, and this would affect the overall power generation output.</p>	<p>year. This is a load factor of about 11.04% which again is typical for similar schemes in UK locations at this latitude.</p> <p>Co-locating solar and BESS creates a more efficient development as a whole in terms of the amount of energy generated from the solar PV that is able to be stored in the BESS.</p> <p>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.</p>
REP01-029/15	Technology	<p>In addition, we would also like to point out that the true measure of a sustainable engineered system is to be measured over its entire life-cycle, taking into account the energy (or CO₂) embodied in the processes of production and disposal as well as the environmental impact, and urge the inspectors to view the project on this basis. [Source Sustainability in Engineering Design, Johnson & Gibson, Elsevier Press]</p>	<p>Environmental Statement Chapter 12: Climate Change [APP-070] has considered likely significant effects from Green House Gas (GHG) emissions from the Construction, Operation and Decommissioning phases of development.</p> <p>Total GHG emissions from the construction phase are estimated to equate to 273,000 tCO₂e. A breakdown of estimated GHG emissions from the construction of the Proposed Development is presented in Table 12.7 on page 29 of ES Chapter 12: Climate Change [APP-070]. The greatest GHG emissions during the construction phase are as a result of the embodied carbon in construction materials (products) which accounts for 88% of the construction phase emissions.</p> <p>The greatest GHG emissions during the operational phase are estimated to result from maintenance activities, associated with the embodied carbon of replacement parts and equipment, which account for 98% of the operational</p>

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		<p>phase. Total operational GHG emissions are estimated to equate to 174,000 tCO₂e over the 40-year design life, as presented in Table 12.9 on page 30 of ES Chapter 12: Climate Change [APP-070]. On an average annualised basis, this is equivalent to 4,350 tCO₂e per year of operation.</p> <p>Total GHG emissions from the decommissioning phase are estimated to equate to 14,300 tCO₂e. Table 12.10 on page 33 and 34 of ES Chapter 12: Climate Change [APP-070] sets out waste disposal emissions are low, 182 tCO₂e. GHG emissions associated with the decommissioning phase are considerably less than those during the construction phase, with the value of 14,300 tCO₂e representing approximately 5.2% of the construction phase emissions.</p> <p>In terms of life cycle, based on the total energy generation of the Proposed Development and the lifecycle GHG emissions of 461,000 tCO₂e, the lifetime GHG intensity of the Proposed Development is 28.7 gCO₂e/kWh. When considering only the aspects relating to the solar energy generation (i.e. excluding battery storage), and corresponding lifecycle GHG emissions of 174,000 tCO₂e, this gives a lifetime GHG intensity of 10.7 gCO₂e/kWh. This compares extremely favourably with fossil fuel electricity generation and is comparable with other low carbon energy generation shown below in Figure 12.2 (page 36 of ES Chapter 12: Climate Change [APP-070]).</p>
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Table 2-8: Fields for Farming – Agenda Item 4

ID	Theme	Verbatim Comment	Applicant Response
REP1-030/1	Inter-Relationship with other projects	<p>The interrelationship and cumulative impact of the Steeple Renewables project with other developments within a 15km radius (the study area for the Environmental Impact Assessment (EIA)) are significant, varied and is being tagged as a Supercluster.</p>	<p>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’.</p> <p>Cumulative and in combination effects of the development have been summarised in ES Chapter 18: Summary [APP-075]. 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.</p> <p>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</p>

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		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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REP1-030/2	Inter-Relationship with other projects	<p>Whilst primarily focused on the inter-relationship of these projects and them fighting over the same access and land (and therefore disputes over project priority and CPO Protective Rights matters) we maintain that the Examining Authority should also consider the inter-relationship and thus cumulative impact of the projects listed below in terms of impacts on the wider community in the Trent Valley, Biodiversity, BMW land use, traffic, views, visual and landscape, and heritage. Each project is managing risks for its own project and infrastructure not holistically.</p>	<p>The Environmental Statement set out the long list of sites that had been considered in the cumulative assessment work at Appendix 2.3 [APP-088]. This list includes each of the projects listed by FFF where they are considered relevant in line with the guidance set out in NSIP: Advice on Cumulative Effects Assessment (2025). With regard to the STEP proposal, it was specifically noted in ES Chapter 2 Environmental Impact Assessment Methodology and Public Consultation [APP-060] at paragraph 2.5.22 that that due to the proposal being in its very early stages, it did not meet the requirements for the detailed cumulative assessment. Nonetheless the Applicant is aware that the footprint of the STEP project is intended to be contained within the existing footprint of the former West Burton Power Station Site, where there is currently built form.</p>
REP1-030/3	Inter-Relationship with other projects	<p>Immediately around Sturton le Steeple</p> <ul style="list-style-type: none">• West Burton A - Demolition• West Burton CGT - Operational• West Burton Ash Recovery - Operational• West Burton STEP - Phase 1 in Progress• West Burton C OCGT - Permitted – not implemented• West Burton CCGT BESS - Permitted – status unknown BDC• West Burton B CCS Project Planned - DCO Viking Project Phase2	

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		<ul style="list-style-type: none">• Steeples Renewables & BESS Planned – DCO Application• Sturton Quarry Permitted – under construction NCC• West Burton Solar Cable Route Permitted –DCO variations in progress• Great Grid Upgrade Planned – DCO Application• West Burton to Ratcliffe Grid - Ongoing Maintenance• West Burton to Keadby Grid - Ongoing Maintenance• West Burton to Sundon - Ongoing Maintenance• Oil transfer pipelines - Ongoing Maintenance BDC• Woodland Solar - Permitted – Implemented BDC• BumbleBee Solar - Permitted – Implemented BDC	
REP1-030/4	Inter-Relationship with other projects	Within 15km to include <ul style="list-style-type: none">• Oakes Lane Solar - Planned• Cottam A - Decommissioning• Cottam Gas Development Centre - Operational• Cottam Solar Cable Route - Permitted –DCO• Gate Burton Energy Park Cable Route - Permitted –DCO• Tillbridge Solar Cable Route - Permitted –DCO	

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		<ul style="list-style-type: none">• Cottam Nuclear SMR & Data Centre - Planned – DCO Application• Torksey Ferry Road Solar - Planned – WLDC• High Marnham Hydrogen Power - Planned – DCO Application• One Earth Solar - Planned – DCO Application• Stow Farm Park Solar - Permitted – Implemented WLDC	
REP1-030/5	Inter-Relationship with other projects	Fields For Farming (FFF) has included details of cumulative impact in its individual ISH Agenda Item submissions, but in summary	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 includes a cumulative assessment which addresses the potential effects. Several of the nearby cumulative projects are located at the site of the former West Burton Power Station which has been an established feature of the landscape for many years. Other projects would have very little potential intervisibility with the Proposed Development due to the very limited extent of the landscape beyond the immediate surroundings of the Site from which the Proposed Development would be visible. The matter of the overall effect on landscape character was considered and the assessment identified that the wider landscape would be characterised in part by the presence of solar energy developments, but this would only serve to continue the existing presence of energy development in the landscape which is acknowledged in the published landscape character assessments for the area.
REP1-030/6	Cumulative Industrialisation of the Landscape	While each developer's Landscape and Visual Impact Assessment (LVIA) may find only "minor" or "not significant" effects when viewed from specific, distant viewpoints, the sheer number of projects (solar arrays, new power lines, industrial facilities) fundamentally alters the character of the entire rural Trent Valley area.	

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REP1-030/7	Cumulative Industrialisation of the Landscape	This piecemeal approach bypasses a true understanding of the qualitative shift from a pastoral, agricultural landscape to a dense "energy landscape," resulting in a significant, unmitigated, and irreversible cumulative impact on local amenity and sense of place.	Please see the Applicants response to Fields for Farming [RR-035/33] found on page 264 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-030/8	Cumulative Industrialisation of the Landscape	The combined effect of multiple solar farms and associated battery storage facilities within the radius is leading to the industrialisation of a rural, agricultural landscape, which fundamentally alters the area's character, an effect cumulatively that is significant and adverse.	
REP1-030/9	Cumulative Heritage Impact	The applicant has assessed their impacts individually rather than collectively, thereby failing to capture the holistic, heritage landscape-scale effect finding only "minor" or "not significant" impacts on nearby heritage assets when viewed in isolation.	Please see the Applicants response to Fields for Farming [RR-035/37] found on pages 266-269 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-030/10	Cumulative Heritage Impact	However, the combined effect of multiple projects fundamentally alters the historic character and setting of the wider rural, agricultural landscape that gives those individual heritage assets their significance. This results in an unmitigated, cumulative qualitative shift in the historic environment that the fragmented assessment process fails to address.	Please see Applicant's previous response at row REP1-030/1.
REP1-030/11	Cumulative Flood Risk	There are significant concerns that the combined impact of multiple projects on impermeable or altered surfaces in an area	

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		with heavy clay soils is not sufficiently modelled, potentially exposing communities to a greater flood risk over time.	
REP1-030/12	Cumulative Flood Risk	The entire area is part of the extensive and complex flood dynamics of the River Trent valley floor. Local Authorities have already expressed concern regarding lack of a holistic, catchment-level evaluation of the combined effects of all the solar projects around the West Burton, Cottam and High Marnham grid connection points.	Please see the Applicants response to Fields for Farming [RR-035/23] found on pages 248-251 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-030/13	Cumulative Flood Risk	Assessing each project in isolation leads to an underestimation of the cumulative impact on the overall floodplain capacity by fundamentally altering how surface water flows and drains from the land. The Applicant has ignored the qualitative reality of the site's heavy clays soils and highwater table where standard mitigation may be ineffective.	
REP1-030/14	Cumulative BMV and Socio-Economic Impacts	Government policy dictates that large solar projects should avoid BMV land where possible to protect food security, and that the cumulative impact of multiple projects in an area must be a material consideration.	Please see the Applicants response to Fields for Farming [RR-035/25] found on pages 252-255 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-030/15	Cumulative BMV and Socio-Economic Impacts	The cumulative impact of multiple projects in the Trent Valley has not been adequately assessed or mitigated, leading to significant unaddressed harm despite the applicants' claims. A piecemeal approach masks the substantial cumulative loss of Best and Most Versatile (BMV) agricultural land across county	

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		boundaries, threatening food security by bypassing policy intent.	
REP1-030/16	Cumulative BMV and Socio-Economic Impacts	This piecemeal approach bypasses the intent of the policy and creates an unmitigated, significant cumulative impact on regional food production and national food security.	
REP1-030/17	Cumulative BMV and Socio-Economic Impacts	The applicant has overplaying the benefits of temporary construction jobs while ignoring negative cumulative impacts on the local economy, such as the displacement of tourists and reduced quality of life for residents.	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 direct jobs on-site and indirect/induced roles in the wider economy, during the 24-month construction phase. 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. 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] .
REP1-030/18	Cumulative BMV and Socio-Economic Impacts	The only sustainable long-term economic benefits (jobs and investment) will come from separate nuclear, fusion, and hydrogen projects, with the solar farms offering minimal ongoing community benefit.	

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			<p>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 the local workforce where possible will result in a long term significant benefit.</p> <p>The Applicant notes the comment regarding farmland. The ES Chapter 15 – Land Use and Agriculture [APP-072] addresses matters related to agricultural viability.</p>
REP1-030/19	Traffic	The cumulative traffic generation (both construction and operational) from multiple concurrent projects is underestimated and will lead to severe congestion and safety issues, which the developer's assessments do not adequately address.	<p>Please see the Applicants response to Fields for Farming [RR-035/29 and RR-035/30] found on pages 258-262 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP1-030/20	Traffic	The cumulative impact on traffic has not been adequately mitigated because developers assess their impacts using a limited, fragmented approach that fails to capture the true, combined strain on the local road network.	
REP1-030/21	Traffic	While each developer's Transport Assessment might claim minimal impact based on standard models and a specific list of "committed developments" at that time, this approach ignores the dynamic, continuous flow of construction traffic from all concurrent projects.	

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REP1-030/22	Traffic	<p>The result is an underestimation of severe congestion, safety risks (particularly for non-motorised users), and disruption to the wider community. This piecemeal assessment bypasses the need for a holistic transport management strategy across the region, creating a significant and unmitigated cumulative impact on local infrastructure and quality of life.</p>	
REP1-030/23	Biodiversity	<p>The cumulative impact on ecology and biodiversity has not been adequately mitigated because, while developers for each project claim a Biodiversity Net Gain (BNG), these assessments are fragmented and fail to capture the holistic impact on the wider ecological network.</p>	<p>Please see the Applicants response to Fields for Farming [RR-035/11] found on pages 235-238 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP1-030/24	Biodiversity	<p>Each developer focuses on the minor gains or losses within their own red-line boundary, but the sheer number of large projects across the Trent Valley leads to significant cumulative habitat fragmentation.</p>	
REP1-030/25	Biodiversity	<p>This piecemeal approach bypasses the need for a landscape-scale strategy, failing to address how mobile species will navigate the newly developed checkerboard of land, ultimately resulting in an unmitigated, significant, and long-term adverse impact on regional biodiversity.</p>	
REP1-030/26	Biodiversity	<p>The cumulative impact on biodiversity has not been adequately mitigated because, like other aspects, the project-by-project</p>	

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		assessment approach fundamentally underestimates the total, regional effect on ecological networks.	
REP1-030/27	Conclusion	The Applicant and its consultants use standard methodology to classify impacts. This assigns a significance level to each individual impact based on its magnitude and the sensitivity of the receptor.	Please see Applicant's previous response at row REP1-030/1.
REP1-030/28	Conclusion	An impact classified as "minor" is often judged to be "not significant" in a formal planning context and therefore not requiring further mitigation and the Applicant has put too much reliance on this throughout.	
REP1-030/29	Conclusion	The documentation is fragmented, and an overall cumulative impact assessment including other projects is not provided.	
REP1-030/30	Conclusion	Project-by-project assessment misses the fact that our communities are bearing the full brunt of these "minor" changes, and the cumulative impact, while individually minor, creates a qualitative shift in our living environment.	
REP1-030/31	Conclusion	FFF challenge this judgement. This quantitative assessment fails to capture the true life experience of multiple "minor" changes. When combined, these "small" changes, such as altered views, increased noise, and changes to the rural character create a significant and adverse qualitative shift in our local environment and on our quality of life.	

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REP1-030/32	Conclusion	DCO should not be consented on the grounds of Cumulative Significant Adverse Impact.	
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Table 2-9: Fields for Farming – Agenda Item 6

ID	Theme	Verbatim Comment	Applicant Response
REP1-031/1	Impact on the historic environment	<p>This is a summary of the key issues around Agenda Item 6 submitted on behalf of Fields for Farming (FFF). It seeks to oppose the application for a Development Consent Order (DCO) by Steeple Renewables Limited (the “Applicant”) for the Steeple Solar Farm and Battery Energy Storage System (BESS) (the “Proposed Development”).</p> <p>The area around the affected villages of Sturton-le-Steeple, North Leverton, South Wheatley, Fenton & Littleborough is steeped in history.</p>	<p>Noted.</p>
REP1-031/2	Archaeology	<p>The County Archaeologist and Inspector of Ancient Monuments were both sceptical of the approach taken by the Applicant and by the relative paucity of their results. Given the size and significance of the Roman settlements, its ribbon developments and the route of the Lindum-Danum road, we also believe the Applicant is understating the importance of the Archaeological remains, not only around Littleborough but Burton Round, Sturton and the surrounding ridge and furrow fields.</p>	<p>It is acknowledged that there is currently disagreement between the Applicant and Consultees with regard the timing of further trial trenching within the Order Limits. Consultations are ongoing with regard to this.</p> <p>The Applicant does not agree that the significance of archaeological remains has been understated, to the contrary, the approach with regard to archaeology has taken the precautionary approach of avoiding the most significant areas of archaeological interest, as identified by the geophysical survey, and outlined in Appendix 9.3 Archaeological Mitigation Statement</p>

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			<p>[APP-124]. Preserving these remains <i>in situ</i> within the scheme is in line with best practice and using the results of the archaeological evaluation (comprising the geophysical survey) to inform the design of the scheme is in accordance with Footnote 94 of EN-3 which states that “<i>The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions.</i>”</p>
REP1-031/3	Archaeology	We believe that a much more detailed and thorough investigative project should be undertaken prior to any granting of a DCO.	The Applicant’s approach with regard to pre-determination works is archaeologically led, and is in line with current policy and guidance, including National Policy Statements, and recent draft guidance <i>Archaeology and Solar Farms: Good Practice Guide</i> which has been prepared jointly between representatives of Historic England, Cadw, the Chartered Institute for Archaeologists (CIa), Association of Local Government Archaeological Officers (ALGAO), the Local Government Association, the Federation of Archaeological Managers and Employers (FAME) and Solar Energy UK.
REP1-031/4	Listed Heritage	The presence of 33 listed buildings locally, many of them directly adjacent to the proposed development, shows the important historical and cultural heritage.	The significance of these assets has been considered as part of the assessment within ES Chapter 9 – Cultural Heritage [APP-067], and Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122].
REP1-031/5	Listed Heritage	The Applicant’s approach to this issue is to parcel up each “asset” without considering setting or context, and to seek to limit the negative impact to “minor” by ignoring the ability of the human eye to take in the broader landscape and the impact on it created by mitigation measures largely comprising high hedges designed to block the open views, as these would be compromised by the intrusion of rows of solar panels.	It is considered that this a misunderstanding of the Applicant’s approach to assessment. While each asset is considered separately, as appropriate, the setting of each asset has been considered. As outlined in Section 6 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122], the assessment of setting has been carried out using the methodology set out in Historic England guidance <i>GPA3: The Setting of Heritage Assets</i> .

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REP1-031/6	Conclusion	<p>Any proposed development must take into account the potential and irreversible damage to the character setting of a number of listed buildings and scheduled monuments of national importance, as outlined by the Local Development Plan and endorsed by a number of historical and other bodies. The Applicant's current environmental report has singularly failed to address these issues, instead concluding that "anything can be mitigated" and that "there would be no significant environmental impact": both claims absurdly wide of the mark.</p>	<p>There will be no irreversible damage to the setting of any designated heritage assets, this is a temporary, reversible development, as outlined in Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122]. It is acknowledged that the Applicant has concluded there would not be any likely significant effects to identified receptors, however it is not the case that no impacts were identified, or that it is considered that these can be fully mitigated. In ES Chapter 9 – Cultural Heritage [APP-067], it is concluded that there will be residual effects to the significance of the following assets:</p> <ul style="list-style-type: none">• Segelocum Roman town Scheduled Monument – Minor adverse, not significant;• Medieval settlement and open field system immediately south east of Low Farm Scheduled Monument – Minor adverse, not significant;• Church of St Martin – Minor adverse, not significant;• Church of St Peter & St Paul – Moderate adverse, not significant;• North Leverton Windmill – Minor adverse, not significant; and,• Manor Farmhouse – Minor adverse, not significant. <p>In relation to the 'anything can be mitigated' comment, this is in response to the Scheme's potential impacts with regard to archaeology. As identified in Appendix 9.5 – Outline Written Scheme of Investigation for Post-Consent Archaeological Works [APP-126], a range of mitigation options are available following further post-consent archaeological works, up to and including avoidance. These measures allow an appropriate response according to any</p>
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			identified archaeology's significance and anticipated impacts resulting from the Scheme.
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Table 2-10: Fields for Farming – Agenda Item 7

ID	Theme	Verbatim Comment	Applicant Response
REP1-033/1	Background	Flood risk, groundwater and contaminated land Time constraints did not allow FFF to make further representations and raise questions on this matter.	Noted.
REP1-033/2	Background	The village of Sturton le Steeple and its neighbours is built on underlying clay with only a shallow (up to 12 inches) of topsoil covering it. The clay acts as an impermeable layer, preventing water from soaking into the ground quickly. In addition, in the area to the East, the water-table is noted as being high.	The Applicant acknowledges the underlying clay geology and the presence of shallow groundwater particularly in the areas closest to the River Trent.
REP1-033/3	Background	The land to the East of the proposed development is being quarried to remove sand which will further compound the issue by removing a large area of highly permeable land which currently assist with water management.	The Applicant acknowledges the off-site quarrying activities. The cumulative impact of the Proposed Development and Sturton le Steeple Quarry was considered in ES Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066] . The cumulative impact on flood risk was found to be not significant on the basis that both schemes are required to include mitigation to ensure there is no resulting increase in flood risk.
REP1-033/4	Background	The surface water flows from the surface of the solar array to the areas in between the rows with an increased kinetic energy. This leads to an increased concentration of surface water and	Full details of surface water management are contained within the submitted Surface Water Drainage Strategy [APP-120] . This document explains how the spacing between the solar panels prevents runoff from the panels from being

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		<p>erosion in these areas and has the potential to create channelised flows, eroding the soil further and increasing the volumes and rates of surface water discharge. This can be further exacerbated by the lack of maintenance and further erosion/compaction from vehicles such as maintenance vehicles.</p>	<p>concentrated in one location. The area beneath the panels will be planted with suitable vegetation to mitigate against kinetic compaction and prevent rivulet formation. An Outline Soil Management Plan [APP-132] has been submitted (ES Appendix 15.2) with Requirement 11 of the dDCO [APP-041] also securing a Soil Management Plan. This details the proposed methods to minimise soil damage and compaction.</p>
REP1-033/5	Background	<p>The impacts of the above are a compounded flood risk from run-off leading to rapid onset or flash flooding and prolonged waterlogging, all of which has, is and continues to be experienced in the villages (refer the Parish Council, BDC and NCC reports).</p>	<p>ES Appendix 8.1 Flood Risk Assessment [APP-117 to APP-119] acknowledges the existing flood risk to the villages due to overland surface water flow. As noted in the Applicant's Relevant Representation Response [REP1-008] 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] demonstrates that runoff rates will not be increased as a result of the Proposed Development. 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. The location of the two flood reduction basins is shown in Appendix J of the Surface Water Drainage Strategy [APP-120]. This is an additional voluntary measure for the benefit of the local community and is</p>

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			separate to the measures proposed to control runoff from the Proposed Development.
REP1-033/6	Flood Capability and Authority	There is little flood risk capability with Bassetlaw District Council following a re-structure, that given, Nottinghamshire County Council are the Local Lead Flood Authority and FFF seek confirmation that they are able to represent residents' concerns given major flood events in the area since 2000 and adequately manage this project post DCO.	The Applicant has engaged with Nottinghamshire County Council in their role as Lead Local Flood Authority during the preparation of the Flood Risk Assessment [APP-117 to APP-119] and Surface Water Drainage Strategy [APP-120] . Details of consultation undertaken by the Applicant in relation to flood risk and drainage are included in Appendix E of the Surface Water Drainage Strategy [APP-120] .
REP1-033/7	Flood Risk Assessment - Cumulative Impact	The Flood Risk Assessment does not include other projects and so does not adequately assess the worst-case scenario. A number of projects have and propose the use of attenuation ponds as mitigation, there is no clear plan on how the release from these cumulative schemes will work together or their release be controlled.	The Flood Risk Assessment [APP-117 to APP-119] is only required to assess the impacts of the Proposed Development. The attenuation ponds proposed as part of the Proposed Development are designed to ensure discharge rates are restricted to Greenfield rates and therefore do not result in an increase in flood risk off-site. This discharge rate has been agreed with the Lead Local Flood Authority and Trent Valley Internal Drainage Board. The cumulative impact of the Proposed Development with other relevant nearby developments was assessed in ES Chapter 8: Hydrology, Hydrogeology, Flood Risk and Drainage [APP-066] . The cumulative impact on flood risk was found to be not significant on the basis that all developments are required to restrict runoff rates to a rate agreed with the regulatory authorities so as not to result in an increase in flood risk off-site.
REP1-033/8	Water-Run Off	This is an area of concern for many residents and an event that happens within the wider community regularly.	As noted above, ES Appendix 8.1 Flood Risk Assessment [APP-117 to APP-119] acknowledges the existing flood risk to the villages due to overland surface water flow and has included measures to both mitigate the flood risk from the

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			Proposed Development and provide measures to reduce the existing risk to Sturton le Steeple.
REP1-033/9	Water-Run Off	Due to the nature of the soils in the villages, there is a known high risk of surface water (pluvial) flooding. The current drainage system within the villages cannot cope with high volumes of surface water run-off and there are no plans to remediate this issue within the DCO documentation, merely the addition of attenuations ponds.	As detailed within the Surface Water Drainage Strategy [APP-120] surface water runoff from the Proposed Development will be controlled and released at greenfield rates, therefore there will be no additional runoff from the Proposed Development within the drainage systems in the villages. The proposed flood mitigation basins, offered as a voluntary measure to help improve the existing flooding issues in Sturton le Steeple, aim to hold back runoff from higher in the catchment (beyond the site boundary) and reduce the burden on existing drainage systems in the village during an extreme rainfall event. This is described in the Surface Water Drainage Strategy [APP-120] .
REP1-033/10	Water-Run Off	There is no evidence to show that the solar panels will not interrupt current natural drainage patterns and so could potentially reduce the amount of rainfall absorbed by the ground leading to further increased run-off.	The Surface Water Drainage Strategy [APP-120] explains how runoff from the panels will be absorbed and slowed by the vegetation underneath, allowing it to soak into the soil, in a similar manner to natural conditions without increasing runoff.
REP1-033/11	Water-Run Off	The applicant's Construction Environmental management Plan (CEMP) includes wheel washing as a mitigation measure, yet there does not appear to be provision for the consequences of this in the flood risk assessment.	As noted in the Applicant's Relevant Representation Response [REP1-008] 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. ES Appendix 8.1 Flood Risk Assessment [APP-117 to APP-119] discusses the operational phase of the Proposed Development only; no wheel washing is proposed during the operational phase.

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REP1-033/12	Water-Run Off	The mitigation focuses on protection of equipment rather than the community.	The Applicant does not agree with this statement. Both the Flood Risk Assessment [APP-117 to APP-119] and the Surface Water Drainage Strategy [APP-120] describe measures committed to by the Applicant to ensure there is no increase in flood risk off-site. In particular, the Applicant has set aside an area of land to provide two flood reduction basis that are designed specifically to reduce the flood risk to Sturton le Steeple village. This is not mitigation for the impacts of the Proposed Development but is a voluntary measure specifically to provide benefit to the local community.
REP1-033/13	Altered Flow Paths	Solar panels can disrupt overland flow routes, leading to potential concentration of water and increasing flow velocities in certain areas leading to erosion and/or localised flooding. FFF cannot see where this has been assessed.	The behaviour of surface water flows beneath the solar panels is discussed in Surface Water Drainage Strategy [APP-120] , paragraph 5.3.30 – 5.3.36. The Applicant does not agree that solar panels could disrupt flow routes or increase velocities, due to the small cross-sectional area of the solar panel supports.
REP1-033/14	Changes in Soil Moisture	The presence of solar panels can alter soil moisture patterns, potentially impacting the rate and volume of runoff, again FFF cannot see where this risk has been assessed.	ES Appendix 15.2: Outline Soil Management Plan [APP-132] addresses wet soils during construction, operation and decommissioning to ensure soil is managed and monitored. Field drainage is also addressed. If areas become too wet or dry in the management period during operation after construction they will be restored. Requirement 11 of the dDCO [APP-041] secures a Soil Management Plan that builds on the details provided in the outline Soil Management plan.
REP1-033/15	Land Management	The applicant will be responsible for land management and will be the riparian owner of a number of watercourses. Proper land and watercourse management practices, including maintaining ground cover and avoiding significant changes to the existing	Proposals for land, soil and watercourse management are described in ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089] , ES Appendix 4.4 outline Operational Environmental Management Plan (oOEMP) [APP-092] , ES Appendix 4.2 outline Decommissioning Plan

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		drainage network are crucial in mitigating flood risk, we cannot see this has been included.	(oDP) and the outline Soil Management Plan [APP-132]. Requirements 7 (Construction Environmental Management Plan), 9 (Operation environmental Management Plan), 11 (Soil Management Plan) and 21 (Decommissioning and Restoration) build are secured by the dDCO [APP-041] and build on the details provided in the outline plans.
REP1-033/16	Land Contamination	The Applicant's conclusion that no intrusive investigation is needed before DCO consent is granted and is based on a Desk Study and leaves unknown unknowns. A Phase 2 intrusive investigation involving taking soil and water samples for laboratory analysis is essential to confirm the low-risk assumption and provide greater certainty, and over the wider site.	Requirement 7 of the dDCO [APP-041] sets out that Construction Environmental Management Plan 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. Requirement 12 of the dDCO [APP-041] requires a contamination risk assessment including remediation strategy.
REP1-033/17	Conclusion	Whilst the applicant's consultants (Pegasus Group) are accredited under the IEMA 'Quality Mark' scheme, which demonstrates their competence in managing the EIA process, this is an accreditation of process, not a specific audit of the final FRA document by an independent external firm. Given the concerns raised on this subject matter this requires independent audit.	The Flood Risk Assessment [APP-117 to APP-119] has been reviewed by the statutory consultees for flood risk, namely the Environment Agency, Nottinghamshire County Council (as Lead Local Flood Authority) and Trent Valley Internal Drainage Board. The consultees are wholly independent and will identify any failings in the scope or findings.
REP1-033/18	Conclusion	The Applicant's hydrological modelling fails to account for the unique local conditions of heavy clay, shallow topsoil, and high water tables. While the EA approved the fluvial model for main rivers, concerns remain that the FRA lacks sufficient detailed	The Flood Risk Assessment [APP-117 to APP-119] includes modelling of the larger Ordinary Watercourses (Catchwater Drain, Mother Drain and New Ings Drain). The small ditches throughout the site have small upstream catchment areas and the associated flood risk has been assessed through review of the

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		hydraulic modelling for minor watercourses and ditches that bisect the site. The failure to adequately model these local systems, which are crucial in clay areas with high water tables, is a policy breach of the NPPF's requirement to identify and assess risks from all forms of flooding.	Environment Agency's surface water flood risk modelling. This is considered an appropriate method of assessment for watercourses of this scale / nature.
REP1-033/19	Conclusion	The FRA proposes SuDS and other mitigation, relying on these measures to remain effective for a 60-year lifespan. There is a policy shortfall in so far as the applicant has not demonstrated how long-term maintenance and policing / enforcement will be guaranteed for such a long period, a failure that could expose the local community to a greater flood risk over time.	The lifetime of the development will be 40 years. Section 8 of the Surface Water Drainage Strategy [APP-120] includes proposed schedules for the maintenance of SuDS features. Surface water drainage management and mitigation measures are also described in ES Appendix 4.1 outline Construction Environmental Management Plan (oCEMP) [APP-089] , ES Appendix 4.4 outline Operational Environmental Management Plan (oOEMP) [APP-092] , ES Appendix 4.2 outline Decommissioning Plan (oDP) and the outline Soil Management Plan [APP-132] . Requirements 7 (Construction Environmental Management Plan), 9 (Operation environmental Management Plan), 11 (Soil Management Plan) and 21 (Decommissioning and Restoration) are secured by the dDCO [APP-041] and build on the details provided in the outline plans.

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Table 2-11: Fields for Farming – Agenda Item 8

ID	Theme	Verbatim Comment	Applicant Response
REP1-034/1	Introduction	<p>Fields for Farming (FFF) respectfully submits this written representation to address the significant effects of the Proposed Development on Best and Most Versatile (BMV) agricultural land and the associated socio-economic impacts arising within the host communities. Having reviewed the Applicant's assessments, relevant national policy, publicly available agricultural classifications, evidence on food security and the wider material within the Examination, FFF cannot accept the Applicant's conclusion that the impacts on agricultural land, food production, local farms and the rural economy are minor, negligible or limited in scope. The evidence demonstrates that the loss of this land will have substantial, long-term and in some respects irreversible consequences that are inconsistent with national policy, local policy and the principles of sustainable development.</p>	Noted
REP1-034/2	Introduction	<p>The Proposed Development would remove a large, coherent block of productive Grade 2 and Grade 3a agricultural land from use for at least forty years. This land is essential to several local farms, many of them tenant, family-run businesses, and sustains the agricultural economy and identity of Sturton le Steeple, Fenton, Littleborough, North Leverton and surrounding villages.</p>	<p>Please see the Applicant's common response E (Use of Best and Most Versatile Lane) and F (Food Security) found on pages 285-286 of the Applicant Comments on Relevant Representations [REP1-008].</p>

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		<p>This is not marginal or low-quality land; it forms part of well established rotations, grazing systems and stewardship practices that contribute meaningfully to domestic food production. FFF considers that the Applicant has materially understated the extent and seriousness of these impacts.</p>	
REP1-034/3	Policy Context and Use of BMV Land	<p>National policy is unequivocal in recognising BMV land (Grades 1, 2 and 3a) as a finite and valuable resource. The revised National Policy Statement EN-3 requires solar developers to make use of previously developed land, brownfield land, contaminated land and industrial land wherever feasible. Only where the use of agricultural land is unavoidable should it be considered, and even then, poorer-quality land must be selected over BMV land unless compelling justification is provided. This expectation is reinforced by the Written Ministerial Statement of May 2024.</p>	<p>Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-035/24 and RR-035/25 on pages 251 to 255 which sets out the Applicant's comments regarding policy context and BMV land.</p> <p>With regards Food Security, please see the Applicants common response F (Food Security) found on pages 285-286 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP1-034/4	Policy Context and Use of BMV Land	<p>The land proposed for development comprises almost entirely Grade 2 and Grade 3a soils, confirmed through publicly accessible ALC data. This is high productivity arable and mixed-farming land that plays a recognisable role in food production for the region. The Applicant has not demonstrated that the use of such land is necessary or proportionate, nor have they shown that a meaningful sequential assessment of alternative brownfield or lower-grade land has taken place. Established planning principles make clear that site searches cannot be</p>	

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		constrained by administrative boundaries; yet there is no evidence that the Applicant assessed brownfield land at West Burton or similar large non-agricultural sites despite their proximity and strategic suitability.	
REP1-034/5	Policy Context and Use of BMV Land	Consequently, the use of BMV land at this scale conflicts with national policy and undermines Government objectives relating to food security, agricultural resilience and responsible land use.	
REP1-034/6	Food Security and National Considerations	FFF places significant weight on the national context in which the removal of this land must be considered. Independent evidence published by Science for Sustainable Agriculture in the UK Food Security Outlook to 2050 shows that the UK has already lost 771,000 hectares of farmland in the last twentyfive years and could lose up to 3.96 million hectares, or 23.7%, of its agricultural land by 2050 due to competing demands including renewable energy and environmental land-use changes. Domestic agricultural production could fall by up to 32%, with import dependence rising to between 160% and 260% above current levels depending on population growth scenarios. This report also highlights that solar and bioenergy projects disproportionately displace productive arable land, tightening pressure on domestic food production at a time when yields are plateauing and national demand is rising. Within this context, the loss of a single large block of BMV land is not isolated; it contributes to a cumulative and nationally recognised pattern of	

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		<p>farmland decline. The Applicant's conclusion that the loss is "negligible" therefore fails to reflect the independent evidence regarding the declining availability of agricultural land and its direct link to national food security.</p>	
REP1-034/7	Local Agricultural Impacts	<p>The land affected by the Proposed Development is not generic farmland; it supports integrated farming systems that rely on specific field parcels for rotational diversity, forage supply, grazing stability and soil stewardship. The displacement of such land will fundamentally alter the viability and configuration of several local farms, particularly those operating under tenancy arrangements. These farms cannot relocate land, and reductions of this magnitude directly erode business security, workforce continuity and long-standing agricultural practices essential to the functioning of this rural area.</p>	<p>Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-035/24 and RR-035/25 on pages 251 to 255 which sets out the Applicant's comments regarding local agricultural impacts.</p>
REP1-034/8	Local Agricultural Impacts	<p>In addition to the loss of cropping capacity, FFF also want to emphasise the importance of agricultural by-products generated from BMV land. Straw produced from high-quality arable rotations is indispensable for livestock farming, serving as bedding, feed, and structural fibre within mixed rations. It is also a feedstock for certain green-energy systems and other sustainable operations. The removal of this land will significantly reduce local straw availability, placing pressure on livestock producers who rely on consistent local supply for animal welfare and winter housing. This loss has knock-on consequences for</p>	

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		food production and farm economics in ways the Applicant has not assessed or acknowledged. Increased reliance on imported straw or haulage from distant farms will raise costs, increase carbon emissions and undermine local agricultural resilience.	
REP1-034/9	Local Agricultural Impacts	The tenant and family-run farms affected have also managed this land responsibly for many years under medium- and higher-tier agri-environment and stewardship schemes. These schemes promote soil health, wildlife diversity and ecological resilience across the farmed landscape. The Applicant's assertion that the arable land in this area is of "low value to wildlife" does not reflect the reality of stewardship practices or the biodiversity supported by rotational systems, stubbles, cover crops, hedgerows and margins. These active stewardship commitments form part of the baseline ecological value of the land, and FFF seeks assurance that this has been accurately reflected in the Applicant's Biodiversity Net Gain calculations. Nottinghamshire County Council and CPRE have raised similar concerns regarding the ecological value of the land and its omission from the Applicant's assessments.	Please see the Applicants common response H (General concern on the impact of Wildlife) on page 287 and N (Economic Impact on the local farming community) found on page 291 of the Applicant Comments on Relevant Representations [REP1-008]. In addition to this, the Applicant has committed to retain all trees. 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. 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.
REP1-034/10	Local Agricultural Impacts	Farming in this area supports not only agricultural output but the continuation of generational skill, knowledge, and professional identity that cannot be replaced if lost. Even if the land were returned to agriculture after forty years, the	

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		community fabric, farming structures and specialist knowledge displaced today would not remain intact.	
REP1-034/11	Wider Rural Economic Effects	The agricultural sector in this locality supports a substantial network of rural businesses including machinery dealerships, hauliers, agronomists, contractors, farriers, veterinarians, seed merchants, feed suppliers and rural service providers. The removal of a significant area of productive land reduces demand for these services and destabilises the economics of an interconnected rural system. The Applicant's socio-economic assessment fails to reflect these relationships and places undue weight on negligible long-term employment benefits associated with operational solar infrastructure. Large solar installations do not generate long-term local employment, nor do they compensate for the sustained reduction of agricultural business activity.	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 direct jobs on-site and indirect/induced roles in the wider economy, during the 24-month construction phase. 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. 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] . The use of an SCESP 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,
REP1-034/12	Wider Rural Economic Effects	Consequently, the socio-economic harm extends beyond the boundary of individual farms and affects the broader rural economy and community cohesion.	

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			<p>however, the legacy effect of upskilling the local workforce where possible will result in a long-term significant benefit.</p> <p>The Applicant notes the comment regarding agricultural sector. The ES Chapter 15 – Land Use and Agriculture [APP-072] addresses matters related to agricultural viability.</p>
REP1-034/13	Cumulative Impacts	<p>This part of Nottinghamshire is experiencing sustained cumulative pressure from multiple major developments and NSIPs, including energy, grid and industrial projects. The Applicant's assessment does not sufficiently account for the combined effect of these schemes on agricultural land, rural character and community wellbeing. Within this wider context, the loss of productive agricultural land contributes to an intensifying pattern of impact that is not adequately addressed by the Applicant.</p>	<p>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'. Cumulative and in combination effects of the development have been summarised in ES Chapter 18: Summary [APP-075]. 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.</p> <p>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</p>

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			<p>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.</p> <p>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.</p> <p>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.</p>
REP1-034/14	Procedural Concerns	FFF also wishes to record concerns regarding the limited opportunity available at ISH1 to present the full extent of its evidence on BMV land and socio-economic matters. Given the technical and policy importance of these issues and the volume of material relevant to the Examination, FFF respectfully requests that the Examining Authority consider convening a	The Applicant notes this comment.

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		dedicated Issue Specific Hearing on these matters to ensure that they receive appropriate and detailed scrutiny.	
REP1-034/15	Conclusion	FFF concludes that the Proposed Development would result in the long-term or permanent loss of a substantial area of BMV agricultural land, contrary to national policy and Government guidance. The socio-economic impacts have been understated, and the assessment does not reflect the true extent of harm to local farms, rural businesses or community identity. Independent national evidence on farmland declines and food security further demonstrates that the removal of productive agricultural land is a matter of national concern.	Please refer to the Applicants Response on Relevant Representations [REP1-008] reference RR-035/24 and RR-035/25 on pages 251 to 255 setting out the Applicants comments regarding use of BMV land.
REP1-034/16	Conclusion	FFF therefore respectfully invites the Examining Authority to recognise that the effects on BMV land and socio-economic conditions are significant, to give these matters substantial weight in the planning balance, and to consider whether the Proposed Development can be justified in this location.	

Table 2-12: Fields for Farming – Agenda Item 9

ID	Theme	Verbatim Comment	Applicant Response
REP1-035/1	Policy	A member of the public raised a similar point (disjointed approach and cumulative impact) regarding traffic. The Examining Authority confirmed that although this issue was not	This comment is noted by the Applicant.

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		included in Issue Specific Hearing 1, they would still be examined during the course of the examination.	
REP1-035/2	Overarching NPS for Energy (EN-1 and EN-3)	<p>Section 15.4 requires the applicant to provide a Transport Assessment and to set out measures to mitigate likely significant adverse effects. The NPS for Renewable Energy (EN-3) is also relevant.</p> <p>The applicant fails to meet the policy requirements to adequately mitigate the effects, and that the proposed measures do not fully address "likely significant adverse effects" on the local community, especially during the construction period given the spatial and temporal nature of this proposed development and the cumulative impact with its interaction with other projects (in progress, permitted, and planned).</p> <p>The applicant, in 6.2.13 Chapter 13 Transport & Access ES places much weight on the project not having more than 30% impact (29% impact) when the cumulative impacts are considered. However, the baseline date is not supplied and it cannot be determined if this baseline also includes the many other projects and 'temporary' projects during the survey periods.</p>	<p>ES Appendix 13.1 Transport Assessment [APP-128] has been provided with the DCO application submission.</p> <p>It is considered that the oCTMP [APP-129] submitted, provides suitable mitigation to address the traffic impacts of the development during the construction phase.</p> <p>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'. Cumulative and in combination effects of the development have been summarised in ES Chapter 18: Summary [APP-075]. 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.</p> <p>The cumulative impacts have been assessed with no highway links assessed to have above a 30% traffic impact compared with baseline traffic numbers. This is the threshold indicated by the EIMA and the report has been written based on this criteria.</p> <p>The initial baseline data was collected in 2024, as indicated in the ES Chapter 13: Transport and Access [APP-071]. Additional traffic data collected in 2025 is the subject of ongoing discussion with consultees.</p>

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			<p>The cumulative impact assessment within the ES Chapter 13: Transport and Access [APP-071] includes the schemes identified by the wider DCO team where construction periods are within the zone of influence. As a robust assessment, it was assumed that the construction traffic associated with all the identified schemes would impact the network during the Proposed Development's construction phase between 2027-2029 whereby in reality there could be partial overlap during some of the construction period.</p>
REP1-035/3	Sturton Ward Neighbourhood Plan	<p>The Plan aims to protect the area's rural character and ensure road safety. This proposed development is not aligned to the local plan which seeks to preserve local amenity and road safety.</p> <p>Restricted Byway 31 (Freeman's Lane and Spring Lane), Sturton le Steeple – closed to all motorised traffic (access for horse-drawn vehicles retained via a Kent carriage gap).</p> <p>Restricted Byway 32 (Cross Common Lane), Sturton le Steeple – closed to all motorised traffic (access for horse-drawn vehicles retained).</p> <p>This shows a clear intention within the Plan to protect rural lanes and byways from heavy or inappropriate traffic to preserve their character and safety for non-motorised users.</p> <p>The Sturton Ward Plan supporting documents raised concern about the suitability of existing "poor road networks".</p>	<p>The recorded accident data between 1/8/2019 to 31/7/2024 was purchased from Via East Midlands (the most recent data available at the time of the search request). This confirms that there are no existing highway safety concerns within the area. The records indicate that no fatal accidents occurring within the area during the time period.</p> <p>The PRoWs (including footpaths, bridleways and byways) within the area of the proposed development will remain as per the existing routes during the operational phase. Two additional permissive paths are also proposed within the layout. During the construction phase no diversions or closures are proposed of any PRoWs. The OCTMP outlines a PRoW Management Plan provided in Chapter 7 of the oCTMP [APP-129].</p> <p>Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan that builds on the details in the oCTMP.</p>

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		<p>It clearly aims to restrict traffic on certain minor routes and generally guides development to be mindful of existing infrastructure constraints and the rural character of the area.</p>	
REP1-035/4	Planning Inspectorate Guidance	<p>The guidance on cumulative effects (e.g., Advice Note 11) is relevant. The cumulative impact of traffic from this project and the multiple other projects (solar, nuclear, quarry) has not been adequately assessed, leading to an underestimation of the true impact on the local and regional road network.</p>	<p>The projects within the zone of influence were identified within the ES Appendix 13.1: Transport Assessment [APP-128] and ES Chapter 13: Transport and Access [APP-071]. Please refer to the Applicant's Comments on Relevant Representations [REP1-008] row RR-035/6 on pages 225 to 227 setting out the Applicants comments regarding cumulative effects.</p>
REP1-035/5	Document 6.2.13 ES Chapter 13 Transport & Access - Suitability of Local Roads	<p>Local roads are not designed for the volume of HGV traffic that this (and cumulative projects) will bring to the community. ES Chapter 13 presents the applicants' assessment of the existing road network.</p>	<p>Please refer to the Applicants Comments on Relevant Representations [REP1-008] reference RR-035/29 on pages 258-260 setting out the Applicants comments regarding traffic and transport.</p>
REP1-035/6	Document 6.2.13 ES Chapter 13 Transport & Access - Suitability of Local Roads	<p>Once passed Bole Roundabout, the roads are non-classified and minor with limited street lighting and footpaths. Many of the roads are narrow, poorly maintained and suffer from crumbling, potholes and collapsed verges. Many of these road have no street lighting and no footpaths in sections.</p>	<p>Please refer to the Applicant's Comments on Relevant Representations [REP1-008] reference RR-035/30 on pages 258-260 setting out the Applicants comments regarding traffic and transport.</p> <p>Requirement 8 of the dDCO [APP-041] specifically secures the condition survey.</p>
REP1-035/7	Document 6.2.13 ES Chapter 13 Transport & Access	<p>The applicant also proposes to create a number of new access points compounding the danger to other road users and pedestrians. There are many sharp and blind bends and</p>	<p>Please refer to the Applicant' Comments on Relevant Representations [REP1-008] reference RR-035/30 on pages 260-262 setting out the Applicants comments regarding traffic and transport.</p>

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	- Suitability of Local Roads	Gainsborough Road junction with Station Road is hazardous given the visibility splay at this point.	
REP1-035/8	Document 6.2.13 ES Chapter 13 Transport & Access - Suitability of Local Roads	Road closures are a regular occurrence even though projects pledge to work together to co-ordinate and minimise disruption. This week alone there has been one full road closure (Station Road in Sturton le Steeple), three-way traffic control (Cross Street, Sturton le Steeple) and three-way traffic control (Retford Road, North Leverton). Any road closure, irrespective of duration has significant impacts on residents due to linear nature of the villages.	<p>There are no road closures of the main routes into/out of Sturton le Steeple proposed as a result of the Proposed Development during the construction or operational periods within the vicinity of the site. Details of routes to be utilised are set out in the oCTMP [APP-129].</p> <p>Schedule 6 of the DCO sets out the minor highways and Public Rights of Way (PRoW) that may be temporarily closed as a result of the project and states the sections of Streets and PRoW to be temporarily stopped up.</p>
REP1-035/9	Document 6.2.13 ES Chapter 13 Transport & Access - Suitability of Local Roads	The Applicant claims that all vehicles associated with this project will utilise the same approved route. This cannot be policed and simply will not happen, especially with regard to non-HGVs. We already experience this with the quarry and power station demolition vehicles who use 'rat-runs' to reduce their travel time and operate outside their permitted hours (Nottinghamshire County Council can confirm this regarding quarry).	<p>Please refer to the Applicants Comments on Relevant Representations [REP1-008] reference RR-035/29 on pages 258-260 setting out the Applicants comments regarding traffic and transport.</p>
REP1-035/10	Document 6.2.13 ES Chapter 13 Transport & Access - Safety for Vulnerable Road Users	The safety risks to pedestrians, cyclists, and equestrians are unacceptably high with the temporary but significant increase in HGV traffic on roads and PROW. FFF argue the assessment of the interaction of vehicles (not just HGV's), other project vehicle movements and vulnerable users is underestimated and does	<p>Chapter 7 of the oCTMP [APP-129] outlines a PRoW Management Plan. PRoW user data was obtained for the vicinity of the site and analysed within the oCTMP [APP-129]. Bespoke mitigation measures have been proposed for the routes that are considered to be suitable and commensurate for the potential impact of the development on the routes and the PRoW user numbers recorded.</p>

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		not present the worst-case scenario. The mitigation measures do not go far enough to ensure safety.	Please refer to the Applicant's Comments on Relevant Representations [REP1-008] reference RR-035/30 on pages 260-262 setting out the Applicants comments regarding traffic and transport.
REP1-035/11	Document 6.2.13 ES Chapter 13 Transport & Access - Safety for Vulnerable Road Users	The road from Bole Roundabout to the West Burton Power Station has no street lighting and no footpaths. The road between Sturton le Steeple and North Wheatley does not have a footpath between the two village boundaries. The road to North Leverton has a single narrow footpath but is unlit. The Examining Authority should also note that Sturton le Steeple, Fenton and Littleborough have no shops and no post offices. Residents of these villages must travel (by road or other means) out of the village for these services using the same roads that the projects use. There is a very limited bus service and no train station (nearest are Gainsborough or Retford).	The existing travel options to the site are considered to be consistent for the rural nature of the location of the site. A Construction Worker Travel Plan provided in Chapter 8 of the oCTMP [APP-129] provides measures to support the sustainable travel of the workforce which includes the provision of minibus travel for staff trips. These would be from key areas that the staff travel from, and also where practicable, a minibus service will be arranged between the two railway stations in Gainsborough and the site to allow for public transport to form part of the overall commuting journey for the overall work trips. Please refer to the Applicants Comments on Relevant Representations [REP1-008] reference RR-035/30 on pages 260-262 setting out the Applicants comments regarding traffic and transport. Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan that builds on the details in the oCTMP [APP-129] within this there is an agreed route for construction traffic to/from the north of Sturton le Steeple.
REP1-035/12	Document 6.2.13 ES Chapter 13 Transport & Access - Safety for	The safety risks to pedestrians, cyclists, and equestrians are unacceptably high with the temporary but significant increase in HGV traffic on roads and PROW. FFF argue the assessment of the interaction of vehicles (not just HGV's), other project vehicle movements and vulnerable users is underestimated and does	Chapter 7 of the oCTMP [APP-129] outlines a PROW Management Plan. PROW user data was obtained for the vicinity of the site and analysed within the oCTMP [APP-129]. Bespoke mitigation measures have been proposed for the routes that are considered to be suitable and commensurate for the potential

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	Vulnerable Road Users	not present the worst-case scenario. The mitigation measures do not go far enough to ensure safety.	impact of the development on the routes and the PRoW user numbers recorded.
REP1-035/13	Document 6.2.13 ES Chapter 13 Transport & Access - Safety for Vulnerable Road Users	The road from Bole Roundabout to the West Burton Power Station has no street lighting and no footpaths. The road between Sturton le Steeple and North Wheatley does not have a footpath between the two village boundaries. The road to North Leverton has a single narrow footpath but is unlit. The Examining Authority should also note that Sturton le Steeple, Fenton and Littleborough have no shops and no post offices. Residents of these villages must travel (by road or other means) out of the village for these services using the same roads that the projects use. There is a very limited bus service and no train station (nearest are Gainsborough or Retford).	The existing travel options to the site are considered to be consistent for the rural nature of the location of the site. A Construction Worker Travel Plan provided in Chapter 8 of the oCTMP [APP-129] provides measures to support the sustainable travel of the workforce which includes the provision of mini-bus travel for staff trips. These would be from key areas that the staff travel from, and also where practicable, a minibus service will be arranged between the two railway stations in Gainsborough and the site to allow for public transport to form part of the overall commuting journey for the overall work trips. Details of routes to be utilised are set out in the oCTMP [APP-129]. Requirement 8 of the dDCO [APP-041] secures the oCTMP [APP-129] within this there is an agreed route for construction traffic to/from the north of Sturton le Steeple.
REP1-035/14	Document 6.2.13 ES Chapter 13 Transport & Access - Safety for Vulnerable Road Users	During the construction period (which is classed as temporary) this project alone has a peak vehicle movement in Month 7 of 1970 vehicle trips and 2362 construction trips, 4,726 trips in and around a village of 221 household (2021 census). The applicant has suggested a Road Safety Audit but only of the main access points and after DCO consent putting the project costs before public safety (a recurrent theme, assessments after DCO consent).	ES Appendix 13.1 Transport Assessment [APP-128] sets out the monthly, weekly, daily and hourly trips associated with the Proposed Development for Month 7 which is the peak construction delivery month (noted in the response). In this scenario, there would be an average of around eight deliveries per hour. For an average month the Transport Assessment [APP-128] indicates that there would be around two delivery trips per hour. The oCTMP [APP-129] provides measures and mitigation to ensure that the traffic impact is managed appropriately during the construction period.

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			<p>Road Safety Audits (RSAs) will be provided for the Proposed Development which will be scoped with the local highway authority, and a Designers Response will be provided by the Applicant responding to any matters raised. The Transport Assessment [APP-128] at sections 2 and 5 acknowledged the requirement for undertaking RSAs at locations discussed with NCC.</p> <p>Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan that builds on the details in the oCTMP [APP-129].</p> <p>Please refer to the Applicants Comments on Relevant Representations [REP1-008] reference RR-035/30 on pages 260-262 setting out the Applicants comments regarding traffic and transport.</p>
REP1-035/15	Document 6.3.13 Appendix 13.1 Transport and Access Assessment	Para 4.9: If issues arise due to increased traffic volumes or community concerns, the LPA and LHA may request the applicant to review and implement alternative permitted routes. A review of the local road network will demonstrate there are no alternative routes.	As set out in Chapter 3 of the oCTMP [APP-129] , should any issues arise, then these will be managed by the Applicant appropriately. Should issues persist then, the Applicant will work with the local highway authority to provide an alternative approach, which can include for example an alternative routing, alongside other management methods such as improved signage, sustainable travel initiatives, and management of times of deliveries and shift patterns.
REP1-035/16	Document 6.3.13 Appendix 13.1 Transport and Access Assessment	Para 6.2: Peak Movements – Construction is expected to last 24 months with operations 6 days a week, and 10 hours a day, noting that Saturday is a half day. The peak being in month 7. This equates to 1970 vehicle trips and 2,563 construction trip, and this does not include other projects in the area which will happen either at the same time or sequentially, either way	Please refer to the Applicants Comments on Relevant Representations [REP1-008] reference RR-035/30 on pages 260-262 setting out the Applicants comments regarding traffic and transport.

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		there is a significant cumulative impact yet the assessment does not show this.	
REP1-035/17	Document - 6.3.13 Appendix 13.2 Outline Construction Traffic Management Plan	<p>The applicant relies on a plan that is outline in nature, meaning specific measures and their enforcement have not been finalised.</p> <p>This leaves uncertainty about their effectiveness. The Outline CTMP sets out the proposed management practices. FFF highlight the generic or vague measures within this document and argue they are insufficient to manage HGV movements safely on local roads and PROW.</p>	<p>The oCTMP [APP-129] is outline in nature.. A final version of the document will then be secured through Requirement 8 of the dDCO [APP-040] building on details provided in the oCTMP. The CTMP has to be agreed with the local planning authority and highway authority prior to works commencing for that phase.</p> <p>The oCTMP [APP-129] includes measures and mitigation for the local highway network and PROWs potentially impacted by the Proposed Development. Existing baseline traffic data has been obtained for the links and analysed with reference to the development traffic in the ES Chapter 13: Transport and Access [APP-071]. Existing PROW user data was obtained and analysed for the PROW and each route impacted has measures in place to manage impact during the construction period. This is provided in Chapter 7 of the oCTMP [APP-129].</p> <p>Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan that builds on the details in the oCTMP.</p>
REP1-035/18	Document - 6.3.13 Appendix 13.2 Outline Construction Traffic Management Plan	<p>This leaves uncertainty about their effectiveness. The Outline CTMP sets out the proposed management practices. FFF highlight the generic or vague measures within this document and argue they are insufficient to manage HGV movements safely on local roads and PROW.</p>	
REP1-035/19	Document 6.3.13 Appendix 13.1 Transport and Access Assessment	<p>Para 6.2: Peak Movements – Construction is expected to last 24 months with operations 6 days a week, and 10 hours a day, noting that Saturday is a half day. The peak being in month 7.</p> <p>This equates to 1970 vehicle trips and 2,563 construction trip, and this does not include other projects in the area which will happen either at the same time or sequentially, either way</p>	<p>Please refer to the Applicants Comments on Relevant Representations [REP1-008] reference RR-035/30 on pages 260-262 setting out the Applicants comments regarding traffic and transport.</p>

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		there is a significant cumulative impact yet the assessment does not show this.	
REP1-035/20	Documentation - 2.3 Access and Rights of Way Plan and 2.6 Site Layout	These documents are not helpful in determining which road will be used (either by HGVs or other vehicles) and what for. It needs to be clear which roads will be used by HGVs and what their impact will be on the community not only in terms of the public highway but also PROWs.	The haul routes that are impacted by traffic and PROWs are identified in the ES Appendix 13.1 Transport Assessment [APP-128] and the oCTMP [APP-129]. HGVs will access the eastern and western parcels from the local highway network and unload within the construction compounds, and return to the local highway network following unloading. The materials will then be transferred between compounds/fields/parcels by smaller vehicles such as tractor and trailer on internal site haul routes.
REP1-035/21	Documentation - 2.3 Access and Rights of Way Plan and 2.6 Site Layout	The CTMP suggests that HGV's will delivery all materials to two construction compounds, one on Gainsborough Road (not even classified as a C road), the second through the village to the West on Station Road.	The Applicant confirms that the primary compounds are accessed from Gainsborough Road and Station Road. Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan that builds on the details in the oCTMP [APP-129].
REP1-035/22	Documentation - 2.3 Access and Rights of Way Plan and 2.6 Site Layout	All vehicles will use Gainsborough Road, a road already used by the Power Station demolition, the operational gas power station, the planned BESS, the ash removal, the quarry (set increase due to a recent planning variation), the National Grid pylon maintenance which is scheduled for 2026, and potentially the West Burton Solar Cable as well as this project.	The Applicant understands that this route has been agreed as suitable for HGV traffic for other schemes within the area.

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REP1-035/23	Documentation - 2.3 Access and Rights of Way Plan and 2.6 Site Layout	A (unknown) number of vehicles will continue into the village and travel through the part of the village to the second compound on Station Road. What is not clear is how the equipment will then be transported from this second compound to the fields to the West of the railway line as shown in EN010163-000042-2.5 Field Numbering Plan.	The materials will be transferred between compounds/fields/parcels by smaller vehicles such as tractor and trailer, using the designated haul routes within the site. The OCTMP [APP-129] Chapters 3 and 5 provides information on routing and vehicle type.
REP1-035/24	Conclusion	In conclusion, the Examining Authority is urged to find the traffic assessment submitted by Steeples Renewables inadequate because it fails to provide a full, fact-driven analysis of the cumulative impacts on the local road network.	This comment is noted by the Applicant but not agreed.
REP1-035/25	Conclusion	It does not sufficiently account for the combined effects of traffic generation from other major developments in the area, a critical omission that downplays the true potential for severe congestion and safety issues on already strained routes.	
REP1-035/26	Conclusion	By relying on a limited scope and potentially incomplete data regarding peak hour usage and abnormal load movements, the Applicant has not demonstrated that all significant adverse effects have been appropriately identified or mitigated, particularly concerning non-motorised users and the existing sensitive receptors.	
REP1-035/27	Conclusion	This leaves the Authority without the necessary robust evidence to confidently determine that the proposed development's traffic impacts are acceptable or properly managed, and thus	

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		the application's transport elements remain fundamentally flawed.	
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Table 2-13: Peter Warburton

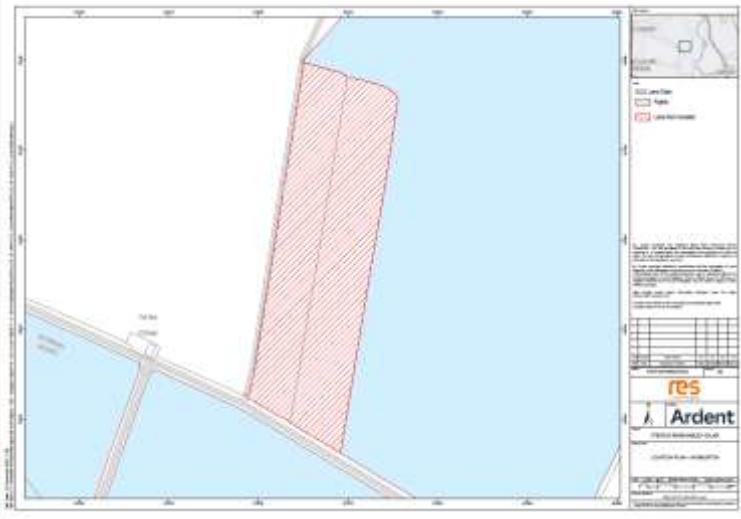
ID	Theme	Verbatim Comment	Applicant Response
REP1-038/1	Background	Background: I have lived in Sturton le Steeple all my life, and farmed there since I left school in the early 1960s. I have been a member of the parish council for 36 years, and served several years as chairman. I am now retired, so apart from my co-ownership of a small parcel of land, do not have any direct involvement with the soil, but am appalled by the proposed desecration of good land.	Please see the Applicants common response E (Use of Best Most Versatile Land) found on pages 285-286 of the Applicant Comments on Relevant Representations [REP1-008].
REP1-038/2	Woodland/ Compulsory Purchase	My Objection: This is purely a personal point, and involves the small parcel of land that I own, jointly with my brother, XXX. The field in question has been in our family for several generations, and on our retirement, a few years ago, XXX and I arranged with the Sherwood Forest rust and the Woodland Trust, to plant the field with trees. This was accomplished in January 2022, and there is a very high success rate of young saplings, they are currently between 4' and 6' tall. The agent of the land-owner behind this RES project has previously tried to buy our field, which stands like an island in the middle of Area D, Land	<p>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 Compulsory Acquisition (CA) powers. This is also confirmed on page 326 of the Applicant Comments on Relevant Representations [REP1-008].</p> <p>Please see plan on following page that shows Mr Warburtons land (red hatching) outside of the Order Limits (blue).</p>

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		adjacent to the River Trent. If the Development Consent Order is granted, the developers would be given authority for compulsory purchase. I find this to be a sinister and unacceptable situation.	
REP1-038/3	Global Warming/ Net Zero	Summary: Whilst accepting many of the arguments about global warming, I have serious reservations about the Nation's rush towards net zero, and particularly the very limited impact solar panels have in producing electricity when most needed.	Please see the Applicants common response L (Scepticism of Solar) found on page 289 of the Applicant Comments on Relevant Representations [REP1-008].
REP1-038/4	Cumulative Impact	I agree with the consensus of local opinion that the accumulation of developments around our village is excessive.	Please see the Applicants common response D (Cumulative Effects) on pages 284 and 285 of the Applicant Comments on Relevant Representations [REP1-008].
REP1-038/5	Residential	The impact that this project in particular would have on the quality of life of a few hundred residents can not be over emphasised.	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

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			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 Restoration) of the dDCO [APP-041] that will build on the details provided in the outline plans.
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Table 2-14: Sturton-le-Steeple Parish Council

ID	Theme	Verbatim Comment	Applicant Response
REP1-039/1	Introduction	<p>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:</p> <ol style="list-style-type: none">Cumulative impacts of this and other major development projects both underway and planned in the local area have not been adequately assessed.Substantial adverse impacts on the local landscape.Substantial adverse impacts on the rich cultural heritage and archaeological significance of the site and the surrounding area.	The Applicant notes this comment.

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		<p>d. Harmful loss of best and most versatile agricultural land.</p> <p>e. Detrimental impacts on the health and well-being of local residents.</p>	
REP1-039/2	Local Context	<p>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]; and (ii) the cumulative 2 long and short list of relevant planning applications at ES Appendix 2.3 [EN010163/APP/6.3.2].</p>	<p>Please see the Applicants response to Sturton-le-Steeple Parish Council [RR-029/02] found on pages 77-78 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP1-039/3	Surrounding Developments	<p>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:</p> <p>a. The development of Sturton-le-Steeple Quarry (NSIP);</p> <p>b. The North Humber to High Marnham National Grid (NSIP);</p>	<p>Please see the Applicants response to Sturton-le-Steeple Parish Council [RR-029/03] found on page 78 of the Applicant Comments on Relevant Representations [REP1-008].</p>

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		<p>c. The decommissioning of West Burton Power Station; and</p> <p>d. The Spherical Tokamak for Energy Production (“STEP”) plant which the government is planning to build at the West Burton power station site.</p>	
REP1-039/4	Developments in parish	There are also a number of smaller projects taking place within the Parish.	Please see the Applicants response to Sturton-le-Steeple Parish Council [RR-029/04] found on pages 78-79 of the Applicant Comments on Relevant Representations [REP1-008].
REP1-039/5	Impacts on residents	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.	
REP1-039/6	Benefits of Steeple Scheme	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.
REP1-039/7	Cumulative impact assessment	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	Regarding paragraph (a), the Environmental Statement did consider potential cumulative effects during the construction period. For example, the Transport Assessment at Chapter 13 of the ES confirmed at paragraph 13.9.2 that ‘A review of other local developments, either allocated, consented, or recently

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		<p>6.2.19]. However, there are at least three aspects where the PC considers this assessment to be inadequate:</p> <ol style="list-style-type: none">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 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.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 largescale 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.The third is the apparent failure to produce any visualisations of cumulative effects as part of the	<p><i>built-out and occupied, has been carried out to determine the cumulative effect of these on the local and strategic highway network in the 2027 and 2029 future year scenarios</i>'. Similarly the Air Quality Assessment at Chapter 14 addressed this matter, for example at paragraph 14.10.6 which noted that '<i>The Applicant's Transport Consultants have identified six cumulative schemes that, either in part or entirely, use the proposed construction traffic route for the Proposed Development, and additionally have the potential to overlap with forecast construction period from 2027 to 2029</i>'. The Noise assessment at ES Chapter 11 also addressed the potential for cumulative effects during the construction period, noting at paragraph 11.11.10 that '<i>The construction and/or decommissioning of 'other developments' in the area, including the decommissioning of the West Burton Power Station, is unlikely to result in any substantial cumulative impacts when considered to be occurring at the same time as the construction of the Proposed Development</i>'.</p> <p>Regarding paragraph (b), with regard to the STEP proposal, it was specifically noted in ES Chapter 2 paragraph 2.5.22 that that due to the proposal being in its very early stages, it did not meet the requirements for the detailed cumulative assessment in line with the guidance set out in NSIP: Advice on Cumulative Effects Assessment (2025). Nonetheless the Applicant is aware that the footprint of the STEP project is intended to be contained within the existing footprint of the former West Burton Power Station Site, where there is currently built form with the project not due to be operational by 2040, with construction therefore long after the construction period of the Proposed Development.</p>
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		<p>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.</p>	<p>Regarding paragraph (c), visualisations are an aid to assist LVIA work, but are not the basis on which judgements are made. It is not made clear which viewpoints it is considered would have views of other cumulative sites. Nonetheless it is the Applicant's position that any cumulative visibility would be highly limited. The assessment of cumulative effects in the LVIA considers potential cumulative effects on both landscape character and visual amenity. Given the very localised nature of the effects of the Proposed Development there is limited potential for it to add significant cumulative effects alongside other developments. Nonetheless the matter of the overall effect on landscape character was considered and the assessment identified that the wider landscape would be characterised in part by the presence of solar energy developments, resulting in a moderate, non-significant effect, and this would only serve to continue the existing presence of energy development in the landscape which is acknowledged in the published landscape character assessments for the area.</p>
REP1-039/8	Landscape Impacts	<p>The PC has three main concerns regarding the landscape impacts of the scheme:</p> <p>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</p>	<p>Regarding point a) the matter of the cumulative assessment is addressed in response to the previous matter above. To reiterate the matter of energy infrastructure having been an established presence in the landscape over the past 50 years is set out in the published landscape character assessments. It is necessary for the LVIA to consider the existing nature of the baseline landscape and its key characteristics.</p> <p>Regarding point b) in the case of visual amenity, the proposed planting and growing out of existing planting within the Site would be such as to restrict adverse visual effects to a non-significant level, as views of the Proposed</p>

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		<p>Environmental Statement). Existing harmful development should not serve as a carte blanche for further harmful development. For example, viewpoint B 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.</p> <p>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).</p> <p>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</p>	<p>Development would now largely be screened by vegetation. It is accepted that views of hedgerow vegetation, rather than a more open view, may be considered to be adverse, but it is not considered that such views of hedgerows would be adverse to such a degree that the effect would be considered significant, noting that hedgerows are an established feature of the baseline landscape, already lining many of the footpaths in and around the Site.</p> <p>Regarding point c) the Applicant considers that these matters were raised were discussed during both the landscape and in particular the heritage sections of ISH1. Please see the Applicant's Written Summaries of Oral Submissions 11 – 12 November 2025 [REP1-009]. The LVIA was drafted in light of the findings of the heritage chapter and the authors of the two chapters were present together during project meetings, including those where the design of the project was developed. The LVIA identifies heritage matters are one of factors taken into account when considering landscape value at paragraph 6.3.19 which notes that '<i>relevant is the condition of the landscape, its rarity in the local area, the recreational value it provides, and any ecological or heritage importance the landscape may hold</i>'. The published landscape character assessment will also consider heritage matters where they are considered to be of relevance to landscape character.</p> <p>The Pilgrim Trail to which is referred, encourages participants to visit a series of specific locations within six separate towns and villages. It is not a promoted walking route. One of the locations suggested to visit is Sturton le Steeple, where it notes that '<i>The Trail Board can be found outside St Peter and</i></p>
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		<p>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 (http://www.pilgrimroots.co.uk/pilgrim-trail/) 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 comments on the historical significance of the landscape in this area set out below.</p>	<p><i>St Paul’s church</i>’. At this location there is no view of the Proposed Development, nor is there from any part of the churchyard. The Reindeer public house opposite the churchyard is also mentioned in the leaflet for the Trail and again would have no view of the Proposed Development. The roadside immediately adjacent to the Trail Board where any visitors would be likely to park would also have no views of the Proposed Development. There would also be no views of the Proposed Development from any of the other five locations in the wider landscape which are included in the Trail.</p>
REP1-039/9	Heritage and Archaeological Impacts	<p>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. The following features of historic significance must be taken into account in assessing the impacts of the Proposals:</p> <ol style="list-style-type: none">Sturton-le-Steeple’s Christian heritage;	<p>Please see the Applicant’s Comments on Relevant Representations [REP1-008] reference RR-029/14 pages 84 and 85.</p>

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		<ul style="list-style-type: none">b. Historic landscape features;c. Littleborough;d. Hablesthorpe; ande. The West Burton Round.	
REP1-039/10	Historical Context	<p>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:</p> <ul style="list-style-type: none">a. Nick Bunker, <i>Making Haste from Babylon</i>, Penguin, 2014b. Michael Haykin and others, <i>Strangers & Pilgrims on the Earth</i>, H & E, 2020.c. Adrian Gray, <i>Restless Souls, Pilgrim Roots</i>, BWR, 2020	<p>Please see the Applicant's Comments on Relevant Representations [REP1-008] reference RR-029/15 on pages 85 and 86.</p>
REP1-039/11	Historical Context	<p>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.</p>	
REP1-039/12	Historical Context	<p>The links with both Baptists and the Mayflower bring many American visitors to Sturton. Travelling through this district of</p>	

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		<p>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 Sturton tower, familiar to Smyth and Robinson in their day, will be destroyed.</p>	
REP1-039/13	Local Tourism	<p>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.</p>	<p>Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/16 page 86.</p>
REP1-039/14	Local Tourism	<p>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.</p>	
REP1-039/15	Local Tourism	<p>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.</p>	<p>Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/17 page 86.</p>

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REP1-039/16	Local Tourism	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:	Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/18 page 86.
REP1-039/17	Local identified assets	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 trails/videos information about the pilgrims. 8 b. Pilgrim Trails - Sturton-Le-Steeple - Pilgrim Roots- This is the trail for Sturton that you can download and listen to on your phone.	Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/19 pages 86 and 87.
REP1-039/18	Impact of development on local tourism	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.	Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/20 pages 87.
REP1-039/19	Landscape Character Assessment	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	Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/21 pages 87 and 88.

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		settlement in the area and how the separatist movement of the early 1600s managed to thrive – its isolation from the main centres of Church governance being significant in this.	
REP1-039/20	Landscape context	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 established 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:	Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/20 page 87.
REP1-039/21	Heritage assets	Many of these survive as 'green lanes', for example at South Leverton:	
REP1-039/22	Historical Context	Many of the bridges in this area were constructed by the drainage commissioners in Georgian times, late 1700s.	
REP1-039/23	Heritage context	An example of the importance of the isolation in landscape character can be seen with the remains of the failed Retford to Lincoln toll road as it approaches Littleborough, and in particular the toll house that stands at the road junction. This is a powerful landscape, representing several strands of Georgian enterprise – successful or not.	
REP1-039/24	Significant heritage assets	Littleborough - This settlement is of great historical importance and is perhaps the most significant Roman site within	

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		<p>Nottinghamshire. It was originally created as a town at a crossing of the Trent on the road from Lincoln to York and it stood on what was then an island. The original island can still be discerned and its isolation amidst the former 'wetlands' helps to create its historic character.</p>	
REP1-039/25	Assessment of heritage assets	<p>Full survey work has never been completed, but recent studies have led to a sense of a greater than expected significance to the site:</p> <ul style="list-style-type: none">a. (PDF) Aerial Reconnaissance and Excavation at Littleborough-on-Trent, Nottsb. Segelocum Roman Town, Littleborough, Nottinghamshire: Report on geophysical survey conducted in December 2015 10c. SNT5708 - Segelocum Roman Town, Littleborough, Nottinghamshire: Report on Geophysical Survey Conducted in December 2015 - Nottinghamshire Historic Environment Record	<p>Segelocum Roman Town is assessed in detail in the ES Chapter 9 – Cultural Heritage [APP-067], and Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122]. The geophysical survey of the Order Limits has also provided further information with regard to the extent of the Roman settlement [APP-123].</p>
REP1-039/26	Heritage assets	<p>The Roman road from Littleborough continues across what are currently fields to join what is now North Street. The formation of this road, which is not the current road to Littleborough, needs to be protected.</p>	<p>Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-035/39 pages 270-271.</p>
REP1-039/27	Historical Context	<p>Littleborough has attracted interest for a long time since Camden in 1594 and the above plan was drawn in 1722.</p>	

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		Although recent survey work has been conducted, the full site has never been investigated.	Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/14 pages 84 and 85.
REP1-039/28	Historical Context	<p>The Roman road and Trent crossing continued in use for centuries after the Romans. It is likely that King Harold came this way in 1066, but the site also has major importance as the location of the early Christian baptisms conducted by King Edwin of Northumbria with St Paulinus in 627-8AD. This is an event of foundational importance in English Christian history and is specifically recorded in the earliest book of English history, Bede's History of the Christian Churches in England written in about 735AD.</p> <p><i>A certain priest and abbot of the monastery of Peartaneu, a man of singular veracity, whose name was Deda, told me concerning the faith of this province that an old man had informed him that he himself had been baptized at noon-day, by Bishop Paulinus, in the presence of King Edwin, and with him a great multitude of the people, in the river Trent, near the city, 11 which in the English tongue is called Tiouulfingacaestir [Littleborough]; and he was also wont to describe the person of the same Paulinus, saying that he was tall of stature, stooping somewhat, his hair black, his visage thin, his nose slender and aquiline, his aspect both venerable and awe-inspiring. He had also with him in the ministry, James, the deacon, a man of zeal and great fame in Christ and in the church, who lived even to our days.</i></p>	

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REP1-039/29	Heritage assets	<p>It should be noted as well that the church here is also ancient, incorporating Roman brick and tile in its structure. Again, the isolation in the landscape is of great importance.</p>	
REP1-039/30	Local Historical Context	<p>Habblesthorpe - This is a 'lost' settlement on the edge of the former wetlands and bisected by the 1700s Catchwater Drain. The church that stood here has decayed but a few gravestones still stand. It was so isolated that it was able to function as a 'Gretna Green' for runaway marriages before the passing of the Clandestine Marriages Act</p>	<p>Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/20 page 87.</p>
REP1-039/31	Local Historical Context	<p>The site is of great importance in Baptist history as being connected with the two founders of the English Baptists – John Smyth and Thomas Helwys. Helwys's family owned the settlement around 1600 and it has been suggested that John Smyth was actually born here.</p>	
REP1-039/32	Local Historical Context	<p>The site has been regularly visited by Baptist historians and ministers, especially from the USA. Again, its isolation is an important aspect of the historical landscape.</p>	
REP1-039/33	Local Historical Context	<p>West Burton Round - The West Burton landscape is important both as the site of a significant 'lost' village, but also for the 'Burton Round', a paleochannel of the River Trent that was significant enough to be mentioned in Shakespeare. The Burton Round was a lengthy meander which enforced a detour on all</p>	<p>Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-029/20 page 87.</p>

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		<p>boats using the Trent, until it was cut off by floodwaters in the late 1790s.</p> <p><i>Methinks my moiety, north from Burton here, In quantity equals not one of yours: See how this river comes me cranking in, And cuts me from the best of all my land A huge half-moon, a monstrous cantle out. I'll have the current in this place damm'd up; And here the smug and silver Trent shall run In a new channel, fair and evenly; It shall not wind with such a deep indent, To rob me of so rich a bottom here.</i></p>	
REP1-039/34	Local Historical Context	<p>The former course of the 'Round' can still be traced for its entire length and therefore forms a landscape of unique historical and geographical significance, and a rare example of a truly 'Shakespearean' scene. The former village can still be identified by the gravestones and the 'hummocks' representing old houses. The site is remote and can only be approached on footpaths across fields. Once more, isolation is a key characteristic.</p>	
REP1-039/35	Local Historical Context	<p>The village also played a key role in the separatist movement. One of its ministers was the leading local puritan, John Wasteneys. In 1602 John Smyth preached here illegally, and John Robinson also preached here.</p>	
REP1-039/36	West Burton Round	<p>This map shows West Burton in 1885:</p>	

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REP1-039/37	Loss of BMV Agricultural Land	<p>The Proposals would result in a significant and harmful loss of productive farmland which carries with it associated food security risks and a loss of jobs for farmers and supporting industries. The Applicant's planning statement recognises that 72.1% of the land within the Order Limits meets the definition of "Best and Most Versatile Agricultural Land". This is more than just a policy designation, this is land that is used to produce wheat, barley, oil seed rape, beans and sugar beat. Those products are in turn used to make bread, biscuits, breakfast cereals, animal feed, beer and much more. Grazing the fields with sheep during the operational phase of the development will simply not mitigate for the real life cost of what is being lost.</p>	<p>Please see the Applicant's Comments on Relevant Representations [REP1-008] RR-051/1 pages 210-212.</p>
REP1-039/38	Agricultural impact of development	<p>Fields for Farming, a local residents group have formed a campaign to represent the strength of objection to this project within our community.</p>	<p>The Applicant notes this comment.</p>
REP1-039/39	Health Impacts of development	<p>This Proposals will have significant detrimental effects on the health and wellbeing of our population and will widen health inequality. There are both direct and in-direct factors that contribute to this adverse impact which have not been appropriately investigated, nor have the public been informed which is wholly unacceptable. These factors include:</p> <ol style="list-style-type: none">the loss of open countryside which contributes to mental health and wellbeing through walking;	<p>The Applicant has prepared and submitted a Health Impact Assessment (HIA) [APP-183] and presents an assessment in respect of each of the points raised. Full detail relating to submitted information can be found in the aforementioned HIA [APP-183]. The HIA [APP-183] assessment acknowledges the potential for direct and indirect effects on mental health as a result of loss of open views and the change in land use, landscape and visual and recreational amenity (Section 7, Table 7.2 'Health and well-being impacts of Proposed Development during the operational phase', consideration of effects on determinant 'Social and Community Influences'). The HIA</p>

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		<p>b. the constant threat of over-industrialisation and the bombardment of information relating to multiple large-scale projects leading to increased levels of anxiety; and</p> <p>c. the risks to farmers' jobs (a group that are often considered to be at increased risk of suicide).</p>	<p>concludes that there is a minor to moderate negative effect on a number of sensitive receptors including children and adolescents, older persons, pregnant women and those dealing with maternal matters, existing residents in nearby communities and people using services in the local area. The HIA [APP-183] indicates that mitigation proposed including PRoW Management Plan and Landscape and Ecological Mitigation Strategy [APP-160] intend to help reduce the physical impacts as far as possible over time and, as such, should contribute to alleviating any indirect mental health impacts.</p> <p>There is no specific reference to agricultural workers in NPS EN-1 or EN-3 in respect of there being a direct or indirect link to their physical and / or mental health as a result of a development. Nevertheless, a number of receptors and groups vulnerable to change have been identified within the HIA which could include, but not be limited to, existing agricultural workers. These are as follows:</p> <ul style="list-style-type: none">• People on low incomes.• Existing residents in nearby communities.• People using existing / future services in the local area.• Existing businesses in the local area. <p>Note, in total there are eight receptors identified and assessed within the HIA; these listed here are considered to be relevant to agricultural workers.</p> <p>As such, the direct and indirect effects on these groups, inclusive of agricultural farm workers, including physical and mental health effects, have</p>
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		<p>been assessed for all development stages and for the whole range of health and wellbeing determinants, as set out in the Health Impact Assessment (HIA) [APP-183].</p> <p>The Applicant acknowledges that the HIA [APP-183] does not include coverage of cumulative impacts at this present time. If such an assessment were to be undertaken, it is considered that there would be no change to the range of effects identified as having potential to impact on the sensitive receptors and groups vulnerable to change. This includes both direct and indirect physical and mental health effects, as is presented in the submitted HIA. Ultimately, there are not considered to be any effects outside the existing scope of the HIA for the Proposed Development in isolation that would alter the conclusions regarding potential positive and negative effects, including their likelihood and severity, if a cumulative assessment were undertaken.</p> <p>The Applicant does not agree with the statement that the public have not been made aware of the Scheme or its likely effects. As reported in section 6 of the HIA, the Applicant undertook statutory consultations with regard to the Proposed Development in accordance with the requirements of the Planning Act 2008 and the EIA Regulations. The requirement for health and wellbeing to be considered, and a HIA to be prepared and submitted with the application, was raised through comments made by Nottinghamshire County Council Public Health Department as part of Section 42 Statutory Consultation Response. As such, this HIA is prepared and submitted with the DCO application. Statutory Consultation and relevant to health and wellbeing are presented in Table 6.1. The Applicant has subsequently satisfied its legal</p>
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			obligations pursuant to the Planning Act 2008 and EIA Regulations and provided sufficient notification of the submission and acceptance of the application.
REP1-039/40	Comments on Health Impact Assessment	The Applicant's Health Impact Assessment [[EN010163/APP/7.2] suggests that the Proposals will lessen health inequality while at the same time recognising that there are risks to health as a result of potential water contamination, fire risk and flooding risks.	The Applicant notes that the HIA [APP-183] makes no claim whatsoever regarding the Proposals' ability to lessen health inequality. Instead, it presents a methodology which aims to facilitate an assessment of the range of negative and positive potential direct and indirect physical and mental effects of the Proposed Development on a wide range of relevant sensitivity receptors.
REP1-039/41	Conclusion	As a Parish Council (a small team of local volunteers), we do not have the capacity or expertise to oversee and hold to account so many Nationally Significant Infrastructure Projects. We have been flooded with thousands of pages of formal documents containing technical language and expected to read then comment on these documents within unrealistic timeframes. We strongly oppose the Proposals on the grounds that the negative long-term impact and harm that this project will cause, vastly outweighs any potential short-term benefits.	Applicant notes this comment.

Table 2-15: Christine Warren

ID	Theme	Verbatim Comment	Applicant Response
REP1-046/1	Introduction	Dear Spencer	No response required.

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		<p>I have to type it again I didn't save the right document.</p> <p>I am a XX year old woman who lives under the XX. My journey with the project began in March 2023 when a man was photographing me in my own home. The stress of the projects has taken its toll on my mental and physical health. In 2024 I was diagnosed with XX and in January 2025 was diagnosed with XX. Although they can not be blamed for the illnesses they can no be discarded.</p>	
REP1-046/2	Quarry/ Working Hours	<p>The quarry was passed in 2005 and went back to planning in 2020 to renew the planning. The project has already broken the planning by running wagons out of the permitted hours 7 to 7 Monday to Friday and 7 to 2 on Saturday. These projects are self-governing. I had to prove they were breaking the planning they just said 'we are not'. I had to get evidence which I did with my security cameras. The permitted amount of wagons is 96 vehicles in and 96 out a day this does not include vehicles which can use the quarry 24/7 7 days a week.</p>	
REP1-046/3	Development/ Landowner	<p>The land was sold in 2021 to a XX who is best mates with XX. He is already putting in for houses on farms which he has now made redundant. Plus planning at Fenton for an office block.</p>	
REP1-046/4	Development/ STEP	<p>2022 the step fusion was granted the right to use WB station to build their project. This will need to go to planning.</p>	

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REP1-046/5	Development/ Power Station	2023 the power station was decommissioned and cold which was over bought was being shipped back to South Africa at a good price. Then removal of ash 30 wagons a day. The demolition of the station began which we as resident in the village were un aware of. My house when I had a meeting with Mason Brown they said they didn't know my house was there and I would have to move out when the towers were demolished. The project has no impact on my so I'm told.	Please see the Applicants common response D (Cumulative Effects) found on pages 284-285 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-046/6	Environment/Health	WB started being built in 1954 and commissioned in 1966. The dust which cover the village after an explosion is unbelievable. I have aske Bassetlaw environmental health to check for asbestos but they say there are no mitigating circumstances for them to test. We eat in for days after. My Grandchildren will never go in my bungalow again I feel it is not in their health interest.	Dust emissions from the Proposed Development is most likely during the construction and decommissioning phases. It will be controlled via air quality and 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] . 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

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			(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.
REP1-046/7	Bassetlaw District Council	Next in 2023 came the gas station who went to planning for battery packs. It was finally passed in November of that year by Bassetlaw planning committee. They had been wined and dined by the project. A Harworth miner who was on the committee ' said Bassetlaw are going to show them how to do it and do it bloody right.' Where is the planning committee now. Through out this planning process I tried to contact Bassetlaw planning and they didn't respond. I was allow at the meeting where it was passed for 3 mins. Not long when the project took the planning committee out in land rovers. The project has been sold to Total.	Please see the Applicants common response D (Cumulative Effects) found on pages 284-285 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-046/8	West Burton Solar DCO	At the same time as the gas station notices started to do up about west burton solar. The project is Island Green power who also had applications in for Cottam and Gate. WB solar want to bring in the gable from the panels in Lincoln.	
REP1-046/9	Gate Burton and Cottam DCO's	Gate Burton and Cottam were passed on 9th July 9 days after labour came into power by XXX.	

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REP1-046/10	West Burton Solar DCO/ STEP/ Gate Burton DCO	WB solar whose consultant was XXX secretary of state was not passed until November later in the year because it clashed with the Fusion on land they both wanted to use. WB solar is now doing corrections and Gate burton has been sold to EDF 2 projects colliding. How can the combined impact not be taken into account when they are colliding with each other.	
REP1-046/11	Development/ Bassetlaw District Council	WE are now in the process of fighting yet another project RES which already is 9,000 pages long. If all the other projects have the same amount the over seeing authority will have to read over 50,000 to find out if they are sticking to what is in there planning. Bassetlaw Have not even been to the RES meeting or submitted any proposal and yet they will over see the projects.	
REP1-046/12	Power Station Decommissioning	Believe it or not when the power station was decommissioned it had no electricity. The grid employed Vue to cable to the sub station on Station road to get power at the same time as laying fiberoptic cable for XXX and virgin media. As a village we were not told of the work and living next to it was told. Oops forgot to tell you we might block you in'	
REP1-046/13	Hedgerows/Wildlife	Then we had Morrisons with there wagons and tractor doing work on the pylons removing hedge rows and frightening the wildlife.	Please see the Applicants common response H (General concern regarding the impact on Wildlife) found on page 287 of the Applicant Comments on Relevant Representations [REP1-008].

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REP1-046/14	National Grid North Humber to High Marnham DCO	Back to this project we now had RES to be followed by National Grid High Marnham to Hull, which will go across country and demolish more anticultural fields.	Please see the Applicants common response D (Cumulative Effects) found on page 284-285 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-046/15	MP	Our MP is more interested in being in London stopping people getting on the tube without paying and going to car boot sale to catch people selling stollen goods. XXX does nothing for his constituents next to WB.	The Applicant notes this comment.
REP1-046/16	Local Area/ Cumulative Impact	If you look at what has been passed and what is coming up for planning does it not beg a question are we being sold out by the government. Cottam is being ear marked to be a nuclear station.	Please see the Applicants common response B (Consultation Fatigue) on pages 283-284, D (Cumulative Effects) found on pages 284-285 and O (Impact on the local landscape) on page 291 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-046/17	Local Area/ Cumulative Impact	There is no where which has as many projects. All being done for greed.	
REP1-046/18	Visual Amenity	I ask that you look at the land from Gainsborough road because everything you see will be a project.	
REP1-046/19	Contact Fatigue	Who do we go to for help? I don't know for 2 years I have emailed 39 people and as yet have not found anyone who cares. I correct that there are people who care just not got any power to do anything about it.	
REP1-046/20	Brexit	We came out of Europe because we wanted to be self sufficient ask yourself how many of the project are British lead and funded. None which I have found.	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

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			Wales with company number 04913497. Renewable Energy Systems Holdings Limited is ultimately owned by the McAlpine Family.
REP1-046/21	Physical or mental wellbeing	The villages around the Grid have been failed by the government with little or no thought for their physical or mental well being.	The Applicant has considered impacts on physical and 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] .
REP1-046/22	Drainage	The land is saturate, ask the quarry they had had a right job building they building because its so wet.	Please see the Applicants common response H (General concern regarding the impact on Wildlife) found on page 287, M (Increased Flood Risk) on pages 289-290 and N (Economic Impact on the local farming community) on page 291 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-046/23	Green Space/ Wildlife	We will have less green spaces than London. Our wild life is confused and doesn't know where to go.	
REP1-046/24	Farming	Please think carefully before you make a decision you are destroying or farming way of life.	

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ID	Theme	Verbatim Comment	Applicant Response
REP1-053/1	Health Mental Health Welfare	I am not a medical expert, just a village resident and tax payer, but I am kept awake at night at the thought of the devastation about to be wrought upon our small rural community. I believe that this relatively isolated area of north Notts is about to face a mental health crisis of unprecedented proportions. This RES project has hung over our heads for several years and I have spent a great deal of time and effort reading and researching the effect that huge solar installations and associated infrastructure can have on communities and their environment. I doubt if more than 50 residents have read and understood the enormity of the industrial tsunami that is about to be unleashed upon us. It is undeniable that the mental health of the local population will deteriorate as a result.	<p>The Applicant has considered impacts on physical and 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].</p> <p>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.</p>
REP1-053/2	Health Mental Health	During the Covid crisis, walking in the countryside was essential to preserve the mental health, quality of life and well-being of the nation's population. Being a remote and quiet rural village,	As per the above, the Applicant is sympathetic to the authors position of mental health and how this has been impacted by the Proposed Development. Section 7, and in particular tables 7.1 and 7.2 of the Health

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	Wildlife	<p>there is little infrastructure and few social activities for local residents to enjoy. However, our most popular activity is that of walking along our numerous footpaths, bye-ways and lanes. If the walkers are lucky, they will catch a glimpse of our elusive deer population, be they Muntjac or Roe deer. They can enjoy sightings of rabbits and our local foxes who, unfortunately, are still subjected to illegal activity by the local hunt. In Spring they are able to watch groups of hares chasing each other across our wide-open fields. They will see the latest additions to our resident bird species that now include Buzzard, Red Kite and Egret. In the dark winter months they can observe foxes trotting across the snow-covered fields.</p>	<p>Impact Assessment [APP-183] submitted with the application addresses how the Proposed Development may affect mental health and wellbeing of local residents. 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]).</p> <p>During the operational phase (ES Appendix 4.4 Outline Operational Management Plan (oOEMP) [APP-092]) it is 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.</p>
REP1-053/3	Health Wildlife	<p>Throughout the Covid lockdown, we used these facilities to safeguard our mental health, reduce our anxiety, enjoy the fresh air, watch the abundant local wildlife and enjoy the passage of the seasons during that time of restricted social activity. During this proposed 2-year build period, it will be almost impossible for residents to enjoy our usual footpaths, bye-ways and roads as these will become clogged with dozens, if not hundreds, of contractor's vehicles, foreign workmen and associated heavy equipment. Resident's feelings of isolation will be exacerbated by the fact that once built, these solar farms will be remotely monitored with no human activity visible. Who will want to walk alongside miles of endless fenced off panel arrays with the constant buss of inverters ringing in their ears; no view, no</p>	<p>Decommissioning stage has also been considered (ES Appendix 4.2 Outline Decommissioning Plan (oDP) [APP-090]. 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.</p> <p>With regards wildlife, please see the Applicants common response H (General concern regarding the impact on Wildlife) found on page 287 of the Applicant Comments on Relevant Representations [REP1-008].</p>

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		horizons, no other human activity and no Wi-Fi signal to speak of?	
REP1-053/4	Local Community Environment Net Zero	<p>Our village population includes a fair number of elderly residents, many who have spent their entire lives living here, and who are increasingly concerned about the impact of this application on their daily lives. They are fearful of the effect of the constant construction noise, trespass, dust in dry summer months, mud, floods, and traffic gridlock. They will have to cope with the hundreds of construction workers, most of them foreign nationals, destroying our environment and who will have no respect for our residents or their values. They are right to be anxious about their quality of life being trampled under the mantra of a Net Zero future. They will undergo the experience of watching their precious Trent Valley and its historic and open agricultural land disappearing under hundreds of thousands of solar panels and the fenced off open fields and footpaths.</p>	<p>Dust emissions from the Proposed Development is most likely during the construction and decommissioning phases. It will be controlled via air quality and 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].</p> <p>Please see the Applicants common response I (General concern regarding noise and vibration) and J (General concern regarding the impact of the Proposed Development on traffic) both found on page 288, as well as L (Scepticism over the efficiency of solar) on page 289, M (Increased flood risk) pages 289-290 and O (Impact on the local landscape) on page 291 of the Applicant Comments on Relevant Representations [REP1-008].</p>
REP1-053/5	Property Values	<p>They are afraid that the reduction in property values will prevent them from being able to afford to move out of the area as their own property devalues. After all, who will want to live in a remote village surrounded by an industrial park? Many will remember the constant traffic and construction noise from 6 am – 11 pm, when the Gas Fired Units at West Burton were constructed. A fourth Gas Fired Generating Unit has been approved so what lies ahead for each of them?</p>	<p>The Applicant notes the concerns raised.</p>

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REP1-053/6	Traffic	Virtually every local road, lane and bye-way gridlocked with convoys of construction machinery, HGVs, LGVs, with the non-stop banging of pile drivers from dawn to dusk. These horrors are bound to increase their feeling of isolation, of being abandoned by the authorities, of being unable to leave the village to go shopping or visit the doctor, trapped in a living nightmare brought upon by the greed of an absentee landlord, the financial markets and politicians seeking a net-zero future.	Please see the Applicants common response J (General concern regarding the impact of the Proposed Development on traffic) found on page 288 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-053/7	Health and Welfare/ Fire	They have yet to learn about the BESS units that will surround them and their homes or the very significant dangers to health and welfare if one or more of these units catch fire. They are almost impossible to extinguish and fire brigades who attend such fires have to stand upwind of the smoke and fumes and watch and wait until the fire burns out. These fires produce toxic pollutants that contaminate the area downwind of a fire and yet there are no government regulations or safety standards regarding these installations. They will be even more concerned to learn that all of these systems are remotely monitored as are all solar array installations. How long will it take the firefighters to reach their remote village once the alarm has been raised?	Please see the Applicants common response C (BESS Safety and Fire Risk) found on page 284 of the Applicant Comments on Relevant Representations [REP1-008] .
REP1-053/8	Councillors/Local Authority	Who will they be able to turn to and seek redress? Not the politicians in County Hall or our local MPs who have failed to reply to their constituents' emails regarding the absence of our local authority at the recent ExA enquiry. They were astonished	The Applicant notes this comment.

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		<p>to learn this week that the same local authority wants to designate our village a conservation area; it's a bit late for that! Their anxiety will only increase in the knowledge that Notts Police will once again fail in their duty to patrol and protect the locality.</p>	
REP1-053/9	Health/ Wellbeing/ Human Rights	<p>What does this application or our local authorities offer in the way of alleviating our anxiety, our fears, our stress, our mental health, our quality of life, of improving our human rights? There is nothing in the RES proposal that will prevent the deterioration of any of these conditions.</p> <p>Absolutely nothing.</p>	<p>As previously mentioned, to safeguard the amenity, health and wellbeing of local residents 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.</p>

Table 2-17: Robert Joseph Fleming (Submission 2 – Traffic and Transport)

ID	Theme	Verbatim Comment	Applicant Response
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REP1-054/1	Introduction	<p>The unlit country roads in and around the villages of North and South Leverton, Sturton le Steeple and North and South Wheatley are in an appalling condition. Even now, drivers veer between the worst potholes as it is virtually impossible to drive in a straight line without hitting one. Main Street in North Leverton was completely resurfaced two or three years ago following a serious flooding event and Retford Road in South Leverton was completely resurfaced during the first week of November this year. The remaining roads continue to suffer from numerous botched repaired potholes, poor surfaces, collapsed verges and flooding as a result of no significant maintenance for many years.</p>	<p>This was considered and responded to in the Applicant Comments on Relevant Representations [REP1-008] reference RR-035/30 (pages 44-47) and RR-042 (pages 330 -340) .</p> <p>The oCTMP [APP-129] Chapter 6 outlines that a Condition survey will be undertaken prior to, during and following the construction period. Further, requirement 8(2)(c) set out that the final CTMP must include details of a condition survey for any road which will be affected by undertaking that phase of the authorised development. The condition surveys will ensure that any potential degradation resulting from construction activities is identified and appropriately rectified, thereby further minimising the impact of the scheme on the network and ensuring routes are restored to their pre-construction condition. This will be undertaken in coordination with NCC Highways.</p> <p>Any remedial works required as a result of the Proposed Development will be agreed by the Applicant with the local highway authority and arrangements will be made to rectify these.</p>
REP1-054/2	Maintenance of roads	<p>Earlier this year the local authority decided to patch those edges of local roads that had become most dangerous. The downside of this approach improved the edges of the road but ignored the potholes in the centre. Unfortunately, because these patch repairs weren't tamped down correctly, the road surface is no longer smooth and has resulted in a very uneven ride on village streets. Another consequence of this shoddy repair work is that during heavy rain, the edges of the roads flood, and as there are no streetlights, motorists cannot see the large pools of water on road edges in the dark unlit roads.</p>	
REP1-054/3	Maintenance of roads	<p>This summer, the road through the village was closed twice for 8 days for road resurfacing. On day 1, we found that the</p>	

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		<p>resurfacing actually meant patching the sides of the roads that had collapsed due to the failure of the local authority to fill in the earlier potholes correctly. These potholes had existed for many years but the only repairs were carried out by 2 men in a van who dumped tarmac into the deepest pothole and reversed the van over the new tarmac! However, this did not apply to the potholes in the centre of the roads and these have become larger. On 19 November 2025, a 1-metre square hole emerged in the newly patched road surface outside a neighbour's drive!</p>	
REP1-054/4	Closure impacts	<p>Those closures meant a 20-mile diversion for villagers wanting to travel south or working in Retford, some 6 miles away. The route was via Littleborough Road, a single-track country lane running east out of the village on the route of a former Roman unlit road.</p>	<p>No road closures of the main routes into/out of Sturton le Steeple are proposed as a result of the construction and operational phases of the Proposed Development within the vicinity of the site.</p> <p>Schedule 6 of the dDCO [APP-041] sets out the minor highways and Public Rights of Way (PRoW) that may be temporarily closed as a result of the project and states the sections of Streets and PRoW to be temporarily stopped up.</p>
REP1-054/5	Inadequate road widths	<p>Whenever two cars met, one had to pull onto the grass verge for the other to pass. It was almost impossible for HGVs and service buses to pass each other but fortunately, the ground was extremely hard at the time due to the prolonged drought. Had the soil been wet due to heavy rain, the grass verges would be destroyed and chaos would have ensued. There are no footpaths on these unlit ancient lanes that were used by King Harold and King William in 1066 and Oliver Cromwell during the Civil War; the only difference today is a thin layer of tarmac on hard core.</p>	<p>This was considered and responded to in the Applicant Comments on Relevant Representations [REP1-008] reference RR-042 (pages 330 -340).</p> <p>The OCTMP [APP-129] outlines that a Condition survey will be undertaken prior to, during and following the construction period. Any remedial works as a result of the Proposed Development will be agreed by the Applicant with the local highway authority and arrangements will be made to rectify these.</p> <p>Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan building on details in the OCTMP. Requirement 8(2)(c) set</p>

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		<p>Notts CC is totally indifferent to the condition of our roads and this attitude will not change in the future. Solar array traffic will destroy this ancient road and all local lanes and bye-way within months.</p>	<p>out that the final CTMP must include details of a condition survey for any road which will be affected by undertaking that phase of the authorised development.</p> <p>As outlined in the oCTMP [APP-129] Chapter 6 and Chapter 7, construction vehicles will be managed using signage and banksmen along the proposed haul routes.</p>
REP1-054/6	Traffic Volumes	<p>Traffic volumes through local villages have increased significantly over the years but the layout of the valley's roads and lanes have remained unchanged over the centuries. When the 50-mph speed limit (enforced by time over distance cameras) was imposed on the A620 from Retford to Bole corner and on the A613 from Bawtry to Gainsborough, there was an increase in traffic using local unclassified roads as a rat run because HGVs were slowing traffic on the hills of the two A roads. Every village in this area suffers from this particular problem that will only increase once the two A roads in the vicinity become clogged with the additional traffic generated by these numerous industrial projects.</p>	<p>Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan building on details in the oCTMP [APP-129]. Requirement 8(2)(a) ensures that the CTMP includes details of associated traffic movements. This includes restricting deliveries where possible to outside of the highway peak hours, when the network is busiest.</p> <p>Measures are proposed within the oCTMP [APP-129] which will manage the construction traffic to limit the impact where possible during the temporary construction period.</p>
REP1-054/7	Highway Safety	<p>The road from Bole junction through Sturton le Steeple to North Leverton is a single unclassified linear road. The Sturton Quarry Section 106 requirement is that all traffic approach the work site from Bole corner via the A620 and A631. The one major junction in Sturton is where Gainsborough Road meets Wheatley Road at the T junction. This is a notorious accident black spot and there</p>	<p>This was considered and responded to in the Applicant Comments on Relevant Representations [REP1-008] reference RR-035/30 (pages 44-47) and RR-042 (pages 330 -340) .</p> <p>The recorded Personal Injury Accident data for the local highway network has been analysed in ES Appendix 13.1 Transport Assessment [APP-128]. Accidents and safety were assessed in relation to transport in ES Chapter 13</p>

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		<p>are at least 3 accidents per year, plus others minor incidents that are not reported. These are caused by vehicles approaching the village from the Bole corner direction that fail to stop and run into the bus shelter or crash into the neighbouring gardens.</p>	<p>and concluded that there would be a negligible impact based on the low number of existing accidents recorded, including no fatal accidents in 5 years. The data analysis concluded that there is no existing highway safety problem, as set out in section 2 of the Transport Assessment [APP-128].</p>
REP1-054/8	Highway Safey	<p>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 proposed storage facility over the railway line. This is the junction identified by the Community Speed Watch team as recording the highest number of vehicles exceeding the posted speed limited by at least 15 miles per hour. Why can't all HGVs be unloaded on the West Burton site instead of using this highly dangerous junction.</p>	<p>The Applicant has no control over the West Burton site, which is why plant and materials are not proposed to be unloaded in this area.</p>
REP1-054/9	Increase of HGV traffic	<p>In the new year, the HGV traffic to and from Sturton Quarry will double to over 200 vehicles per day when the quarry enters full production and produces gravel as well as sand. Additionally, approval has been given for the supply of 10,000 tonnes of sand and gravel per annum in direct sales from the quarry site to small contractors and the general public. These sales alone will put thousands of extra LGVs and other vehicles on our narrow village streets. These will be in addition to the present volume of HGVs carrying fly ash leaving the West Burton site and the traffic carrying the rubble and steel from the West Burton A demolition.</p>	<p>This was considered and responded to the Applicant Comments on Relevant Representations [REP1-008] reference RR-035/29 (pages 77-88) and RR-042 (pages 330 -340).</p>

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		Soon, the National Grid upgrade traffic will also be using these unsuitable village roads and lanes.	
REP1-054/10	Detimental Impact on Local Highway Network	Each lane, bye-way and track in and around the village will become a route into the work site for contractors. These country lanes will become covered in mud during rainy periods and the well cut and tended grass verges will disappear under the tyres of the contractor's heavy machinery. This project will affect every single household in the village and residents have absolutely no confidence in the authorities enforcing any regulations passed to alleviate road nuisance to local residents. Residents are aware of the past failure of Notts Police to address residents concern about speeding vehicles, illegal traffic, or even attempt to police the area.	<p>This was considered and responded to in the Applicant Comments on Relevant Representations [REP1-008] reference RR-035/30 (pages 44-47) and RR-042 (pages 330 -340) .</p> <p>Workforce and deliveries will access the site via a restricted routing from the north of the site. Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan building on details in the oCTMP [APP-129]. Requirement 8(2)(a) ensures that the CTMP includes details of associated traffic movements. Sub-paragraph (2)(b) secures that the CTMP must include details of traffic management requirements on the adjoining public highway. Requirement 8(2)(c) of the dDCO [APP-041] sets out that the final CTMP must include details of a condition survey for any road which will be affected by undertaking that phase of the authorised development.</p>
REP1-054/11	Impact on Pedestrians	In North Leverton, the junction of Main Street, Leverton Road and Station Road is a very busy and increasingly dangerous crossing, exacerbated by cars and trucks parked on both sides of Main Street while drivers visit the only Post Office and shop in the area. The undoubted increase in road traffic across and around this essential junction will become a critical pinch point for road traffic accessing the Sturton site from Retford and the south of the county.	
REP1-054/12	Traffic Nuisance	From our experience with the traffic nuisance caused by the construction of the gas fired generating units, the RES contractors will take the quickest and most convenient route	

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		<p>from their lodgings to Sturton village. Likewise, LGVs and other traffic visiting the work site will ignore the two local A roads. This will impose traffic throughout the day and late into the evening for the duration of the construction work that will affect every local village. There are no alternative routes.</p>	
REP1-054/13	Lack of road maintenance	<p>Our local roads, already suffering from lack of proper maintenance, will collapse under the strain. This project is so huge that convoys of HGVs will be necessary to marshal the traffic in and out of the area and special provision will have to be enforced to allow school buses access and egress from the area. This is not scaremongering; we only have to look at the example of the traffic nightmare imposed upon the residents of Cleve Hill in Kent.</p>	
REP1-054/14	Cumulative Impact on Local Road Capacity	<p>This traffic nuisance will be relentless for several years until the RES project is completed but in the pipeline are numerous (20+) infrastructure projects within a five km radius of our village to consider. The National Grid upgrade, the STEP project, the Gas Fired Generating Unit, the construction of BESS units on the West Burton site, the laying of laying cables from the solar arrays in Lincolnshire, the SMR at Cottam, to name but a few. How will our local roads cope with the cumulative effect of these projects? They will not cope, but be overwhelmed.</p>	<p>The projects within the zone of influence for transport and access elements were identified to assess within ES Appendix 13.1 Transport Assessment [APP-128] and ES Chapter 13: Transport and Access [APP-071]. The cumulative impacts were considered for:</p> <ul style="list-style-type: none">• National Grid Electricity Transmission (North Humber to High Marnham) (NSIP)• West Burton Solar Project (NSIP)• Land to the East of Bumble Bee Farm, Gainsborough Road, Saundby• Land north west and south of Field Farm, Wood Lane

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			<ul style="list-style-type: none">• Land east of Gainsborough Road, Bole• Land at Sturton le Steeple, Gainsborough Road <p>Other sites were identified as not relevant and scoped out for transport and access in terms of cumulative impacts as they did not have the potential to have overlapping time periods for construction or overlapping construction traffic routing. Schemes that were committed but not consented were additionally considered, due to the potential to overlap and have a possible impact.</p> <p>There were considered to be no cumulative effects relating to transport and access that needed to be considered, as set out in ES Chapter 13: Transport and Access [APP-071].</p>
REP1-054/15	Proposed HGV routes	<p>It is essential that all these HGVs and LGVs are routed via the Bole roundabout before entering the area but who will monitor this requirement? Certainly not the planning authorities nor Notts Police! As residents, we have faced this situation before, but our previous experience was only a foretaste of the tsunami of traffic problems we are expected to endure for the coming decades.</p>	<p>Measures and mitigation are proposed within the oCTMP [APP-129] to ensure than impact will be minimised on the local road network.</p> <p>Requirement 8 of the dDCO [APP-041] secures a Construction Traffic Management Plan building on details in the oCTMP [APP-129]. The CTMP must include details of associated traffic movements.</p> <p>The oCTMP [APP-129] includes mitigation measures for construction workforce and deliveries during the construction phase. Delivery vehicle routing, number of trips, staff travel etc. are provided for within the oCTMP [APP-129].</p>
REP1-054/16	Traffic Management	<p>Who will take responsibility for the traffic chaos on our streets and country lanes?</p>	<p>The Applicant, should the DCO be granted, will be bound by the terms of the DCO which is legally enforceable.</p>

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Table 2-1815: Environment Agency

ID	Theme	Verbatim Comment	Applicant Response
REP1-016/1	Introduction	<p>We are advised that on 11 June 2025 an application (reference EN010163) for a Development Consent Order (DCO) was accepted by the Planning Inspectorate for examination.</p> <p>These Relevant Representations contain an overview of the project issues which fall within our remit. They are given without prejudice to any further detailed representations we may make throughout the examination process. We may also have further representations to make when supplementary information becomes available in relation to the project.</p> <p>We have reviewed the draft DCO, Environmental Statement (ES) and supporting documents submitted to the Planning Inspectorate as part of the above-mentioned application.</p> <p>Our key issues are identified below.</p> <p>Summary of the Environment Agency position</p>	<p>The Applicant notes that the document provided appears to be a summary of the Environment Agency Relevant Representation. Please see Applicants response to Relevant Representations [REP1-008] reference RR-025 on pages 112-136. The Applicant will seek to engage with the Environment Agency and provide a summary of engagement through its SoCG.</p>
REP1-016/2	Flood Risk	<p>1. Flood Risk</p> <p>Further work is required to demonstrate a full understanding of the following aspects of flood risk:</p>	

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		<ul style="list-style-type: none">• 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.	
REP1-016/3	Ecology	2. Ecology and Fisheries <ul style="list-style-type: none">• Aquatic habitats and species are not mentioned in the Decommissioning Plan.	
REP1-016/4	Groundwater and Contaminated Land	3. Groundwater and Contaminated Land <ul style="list-style-type: none">• The Conceptual Site Model (CSM) is inadequate, and not all sources of contamination have been assessed.• The ground investigation recommendations for the assessment of potential contaminants includes soil testing but should also include groundwater testing.• Further clarity and consistency throughout all submission documents is required regarding the mitigation measures for unexpected contamination.	

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		<ul style="list-style-type: none">• There is a lack of clarity and consistency between documents regarding the firefighting strategy and the need for firewater containment measures.• There are some outstanding issues regarding the management of surface water drainage, and associated pollution control measures.	
REP1-016/5	Water Quality	4. Water Quality <ul style="list-style-type: none">• Further detail is required in the Outline Construction Environmental Management Plan (oCEMP) to ensure the detailed CEMP(s) adequately mitigate environmental risk.	
REP1-016/6	Work Package Tracker	5. Work Package Tracker <ul style="list-style-type: none">• The Environment Agency tracks its position through the planning process, please see Appendix 2.	

Table 2-19: Fields for Farming and North Leverton Trust

ID	Theme	Verbatim Comment	Applicant Response
REP1-036/1	Introduction	Response to ISH 1 with specific reference to North Leverton Windmill. North Leverton Windmill Trust AND Fields for Farming	The Applicant notes this comment, however it is the case that harm has been identified to the significance of the asset arising from changes to setting which contribute to that significance. Setting is not an asset in its own right.

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		<p>The proposed solar farm development is seen to harm the setting and significance of the windmill, a Grade II* listed heritage asset of national importance.</p> <ol style="list-style-type: none">1. Impact on the Setting of a Heritage Asset2. Inadequate Assessment3. Balancing Public Benefit and Harm	<p>The planning balance is a matter for the decision-maker.</p>
REP1-036/2	Heritage - National Policy Statement	<p>1. Impact on the Setting of a Heritage Asset (EN-1 and EN-3)</p> <p>Both National Policy Statements (NPSs) require that the impact on the setting of heritage assets, particularly those of high significance like the Grade II* listed windmill, must be assessed and considerable weight given to its conservation and harm to the significance of a designated heritage asset, including harm from the development affecting its setting, requires clear justification.</p>	<p>It is the case that the NPS's set out that the setting and its contribution to significance for all assets that could be sensitive to a Proposed Development be taken into consideration, regardless of whether they are designated or not. A higher grade of designation does not place a greater emphasis on this requirement.</p> <p>Where harm is identified to a designated heritage asset, it is agreed that clear and convincing justification is required (as outlined at paragraph 5.9.28 of NPS EN-1). Where a proposed development would result in less than substantial harm to the significance of an asset (as is anticipated with the Grade II* Listed windmill), such harm should be weighed against the public benefits of the proposal (as noted at paragraph 5.9.32 of NPS EN-1). As is outlined at paragraph 9.2.5 of ES Chapter 9 [APP-067], important additions were also made to EN-1 in January 2024, to underpin net zero ambitions, with the presumption, that "...residual impacts are unlikely to outweigh the urgent need for this type of infrastructure." As noted at paragraph 9.2.6, the starting point for this type of development should be that it has met the tests within the NPSs, or any other planning policy.</p>

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			Within the planning balance, if the benefits are found to outweigh the harm of the Scheme then there is self-evidently clear and convincing justification for the Scheme.
REP1-036/3	NPPF	NPPF Glossary defines the setting of a heritage assets as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary).	The Applicant notes this comment –it is noted this is set out at fn231 of NPS EN-1, and is taken into account within the assessment. The definition is also included within Appendix 3 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122] .
REP1-036/4	Heritage	The windmill's significance is tied to its historical context as a functioning windmill in a rural setting. The visual presence of the large-scale solar array would alter this setting, diluting or detracting from the heritage asset's historic character and appearance, even if views are not direct or are partially mitigated by vegetation.	The Assessment identified an adverse effect and less than substantial harm to the significance of this asset [APP-067] , acknowledging the change arising from the Proposed Development and the harm caused to the understanding of the relationship and agricultural landscape which formed the historic surrounds.
REP1-036/5	Heritage	Historic Context - The windmill was built in 1813 by a group of local farmers to grind their corn. The original Subscription Agreement held by the Mills Achieve show over 60 farmers (from Leverton, Sturton, Fenton and Wheatley) subscribed to use the windmill. It also states “..... <i>for the purpose of considering and determining upon the best means of erecting a Mill for the grinding of corn not only for the use of such persons</i>	The historic connection with local farmers and the surrounding agricultural land has been considered in the assessment of the asset – see paragraph 6.50 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122] . Furthermore, this understanding of the origins and biography of this asset will be sustained with the Scheme in place. The immediate agricultural land surrounding this asset will not experience any change and thus this

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		<p><i>so subscribing and signing and sealing these presents but also for the benefit of such industrious poor persons as the Committee to be hereinafter appointed".</i> Its very existence is tied to the surrounding agricultural land and community. The open fields reflect its original, historic, and ongoing purpose.</p>	connection is retained. The existence of this windmill, nor the understanding of the reasons for its existence are not threatened by the Scheme.
REP1-036/6	Heritage	Operational Aspect - The windmill uses wind power to grind locally grown wheat into flour. The surrounding fields are the source of the raw material, creating a direct physical and functional link between the land and the building. The wheat used for wholemeal and white flour is still grown locally and from the fields affected by this development.	The change of use from a visual perspective has been considered as part of the assessment within Section 6 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122] . However, ability to use locally grown wheat for milling will still be possible. As noted in the previous representations, farmers from across Leverton, Sturton, Fenton, and Wheatley previously subscribed to use of the windmill. There is therefore no evidence as to why wheat from within the Order Limits would be of any greater import than any other wheat available from land or land remaining under arable use in the vicinity.
REP1-036/7	Heritage	Aesthetic and Character - Visitors describe the location as "beautiful" and "very rural," feeling like "going back 100 years". The open, agricultural nature of the majority of the landscape provides an authentic and largely unaltered backdrop that allows people to appreciate the windmill in its intended context.	<p>Noted, the rural setting and historic surrounds have been considered as part of the assessment. As noted above, the assessment identified an adverse effect and less than substantial harm to the significance of this asset [APP-067], acknowledging the change arising from the Proposed Development and the harm caused to the understanding of the relationship and agricultural landscape which formed the historic surrounds. This harm is temporary and reversible.</p> <p>The immediate agricultural surroundings of this asset will not experience any change from the Scheme. Furthermore, the Scheme would not remove the entirety of the wider agricultural surrounds of this asset. It is also noted that the West Burton Power Station is and has been a dominant feature in views of</p>

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			and from this windmill for a number of decades within which the windmill has remained operational as a tourist attraction and functioning mill.
REP1-036/8	Heritage	Visual Amenity and Views - The open fields allow for clear, unobstructed views of the windmill as a prominent landmark from many roads, public rights of way and bridleways. The hedges along these routes are currently maintained and cut on a regular basis which afford views towards the windmill. There are many field gateways which allow uninterrupted views. This visual connection is a key part of the public's enjoyment and appreciation of the Grade II* listed building's setting.	It is acknowledged that the windmill is a prominent feature in the landscape, appreciable within the wider surrounds, however this is incidental, and a result of the function of the building rather than by any design intent. This is discussed and considered in relation to the asset's significance in paragraph 6.49 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122] .
REP1-036/9	Heritage	The applicant argued that the setting only relates to the Windmill, its cottage, yard and Mill Lane and that its immediate setting only comprised the field to the North which is not part of the scheme. This is clearly not the case; the above demonstrates that the historic and current association is with the wider fields and community not just the one the applicant referred to.	Consideration of key elements of the asset's setting are provided at paragraph 9.7.18 of ES Chapter 9 – Cultural Heritage [APP-067] , and the setting of the asset is considered in more detail at paragraph 6.50 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-067] . In the Technical Baseline it is acknowledged that the immediately surrounding agricultural land makes a minor contribution to the asset's significance, and this is taken into account in the assessment.
REP1-036/10	Heritage	The applicant has not given clear convincing justification to meet the high bar set by NPPF for harm to this designated heritage asset which is visited by thousands of people.	The Applicant has acknowledged that the Proposed Development is anticipated to result in an adverse effect and less than substantial harm to the significance of this asset. The policy position established in the National Policy Statement is that any harm to a designated heritage asset should require clear and convincing justification. This justification is set out in [Section 5 of the Planning Statement {APP-071}]. In summary, the principal need for the Proposed Development is

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			<p>centred on the significant contribution it will make to the three important national energy policy (NPS EN-1, NPS EN3 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. National planning policy supports the principle and there is a significant need for the Proposed Development.</p>
REP1-036/11	Heritage	<p>2. Inadequate Assessment</p> <p>Historic England's 'The Setting of Heritage Assets' was referred to by the applicant. This document further supports our arguments that the applicant has failed to assess the windmill correctly.</p>	<p>No context has been provided with regard to this statement. Historic England's guidance had been followed as is clearly outlined in the methodology provided in paragraph 9.3.10 of ES Chapter 9 – Cultural Heritage [APP-067], and Section 6 of Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122].</p>
REP1-036/12	Heritage	<p><i>"Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments)."</i></p>	<p>The Trent Valley Way is not a heritage asset in its own right. It is not an historic footpath, having been created in 1998. Views to and from this route are matters of amenity unless they make a specific contribution to the significance of heritage assets (in this case the North Leverton Windmill). This footpath is not contemporary with the windmill. It did not provide a route for workers to access the asset. Whilst it is the case that the windmill is identifiable in views from the footpath, this is due to the distinct form and survival of the sails. They make no particular contribution to significance. Moreover, there is no one key view which the Scheme would affect. The views of this asset are readily available along many points and stretches of pathway from both north and</p>

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REP1-036/13	Public Rights of Way	2.1. Understanding and Significance The applicant argued that views from Trent Valley Way, and indeed, any public right of way are only important if they contribute to the understanding of the significance of that asset and that although the windmill can be seen from a number of areas, it's an incidental view of that windmill.	south of the asset. The Scheme would not remove all views, or the last view or a key view of this asset. It would partially affect for a temporary period, glimpses of the asset when moving through the landscape on a modern footpath. Where relevant to specific assets, certain routes, footpaths etc. and their relationship to assets have been considered within the ES Chapter [APP-067] , and Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122] .
REP1-036/14	Heritage	2.1.1. Trent Valley Way I would suggest that the Trent Valley (and thus the Trent Valley Way) does contribute to the significance of the Windmill.	
REP1-036/15	Public Rights of Way	Integrated into the Route - The path is not just near the windmill, it is a specific, waymarked spur designed to lead walkers to this point of interest. This inclusion in a recognized heritage route highlights the windmill as a key cultural feature of the wider Trent Valley landscape.	
REP1-036/16	Heritage	Historical and Cultural Context - The Trent Valley Way is designed to connect heritage sites and communities, telling the story of the river's impact on the area's business, industry, and culture. By linking to the path, the windmill is placed within this broader historical narrative of the region's industrial and agricultural past.	
REP1-036/17	Heritage	Visitor Experience - The path provides a specific, established way for visitors to access and experience the windmill in its rural context. Walkers following the path can appreciate the	

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		open fields and surrounding landscape that were integral to the windmill's original purpose and ongoing operation.	
REP1-036/18	Heritage	Promoting Awareness - The inclusion in a walking route promoted by heritage and wildlife trusts increases awareness and public appreciation of the windmill's unique character as the only windmill in the UK that has never stopped working.	
REP1-036/19	Heritage	Any development that negatively affects the views or the character of the walk along this spur will harm the public's ability to understand the windmill's significance in the manner intended by the Trent Valley Way's creators.	
REP1-036/20	Heritage	2.1.2. Rural Road and Public Spaces Various other viewpoints in the surrounding area also contribute to the understanding of the windmill.	It is acknowledged that the windmill is a prominent feature in the landscape, appreciable within the wider surrounds, however this is incidental, and a result of the function of the building rather than by any design intent. Just because the asset is visible from a point does not mean that this is a key or important view, which contributes to its significance. The historic and architectural interest of the asset is best appreciated from its immediate vicinity. Views are discussed and considered in relation to the asset's significance in Section 6 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122].
REP1-036/21	Heritage	North Leverton with Hablesthorpe Circular - This trail is specifically designed for exploring the area around the village of North Leverton with Hablesthorpe . It offers multiple perspectives of the windmill, showcasing its place within the	This is a modern walking route linking a number of separate lanes and public rights of way, it is not a heritage asset. Part of the route does run along Mill Lane, and the contribution made by this part of the route to the significance of

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		historic farming landscape that supports it. Any disruption to the visual character of this route would degrade the visitor's ability to appreciate the windmill's rural setting.	the asset is considered within paragraph 6.50 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122].
REP1-036/22	Open Spaces Footpaths	Other local paths - Countless other footpaths weave through the local countryside. As seen in the applicant's own Residential Visual Amenity Assessment, properties and footpaths are located within 500m of the proposed development. While the applicant claims the impact would be "minor," the cumulative impact of this industrial infrastructure on these existing rural walks is a significant point.	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. All PROW routes would remain open during the operation 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.
REP1-036/23	Open Spaces Heritage	Retford Road - The road leading directly to the windmill from Retford offers the most immediate and close-up views. The journey along this rural road is part of the experience of visiting the heritage asset, and any large-scale industrial development nearby would fundamentally change this approach.	Retford Road does not lead directly to North Leverton Windmill, it links Retford and North Leverton. The windmill is accessed via Mill Lane, which is a separate road, and is considered within the assessment – see paragraph 6.50 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122].
REP1-036/24	Open Spaces	Surrounding Villages: - The windmill is a visible landmark from neighbouring villages such as Sturton le Steeple, South Wheatley, Littleborough and Hablesthorpe, even from the Lincolnshire side of the River Trent. Long-distance, clear views from these areas help define the windmill's role as a regional landmark, a focal point in countryside views, and an emblem of the area's rural heritage.	The asset is by its nature a visible feature in the landscape, however just because it is visible does not mean that these are key or important views, which contribute to its significance. Views to/from the North Leverton Windmill in so far as they are relevant to the significance of the asset are considered at paragraph 6.49 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122].

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REP1-036/25	Heritage	Significance to Understanding the Windmill - The collective significance of these views, in addition to the Trent Valley Way, is that they also	The Trent Valley Way is not a heritage asset in its own right. It is not an historic footpath, having been created in 1998. Views to and from this route are matters of amenity unless they make a specific contribution to the significance of heritage assets (in this case the North Leverton Windmill). Where relevant to specific assets, certain routes, footpaths etc. and their relationship to assets have been considered within the ES Chapter [APP-067] , and Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122] .
REP1-036/26	Heritage	Provide Historic Context - The wide, open, and predominantly agricultural landscape is not accidental, it is the historic context that gave birth to and sustains the working windmill. Views from various points help tell this story.	
REP1-036/27	Heritage	Allow for Appreciation of Scale - The lack of industrial development close to the windmill allows visitors to appreciate its scale against a natural rural backdrop, rather than being visually compromised.	The Applicant considers that the existing visual baseline is strongly influenced by the presence of existing energy infrastructure.
REP1-036/28	Heritage and Landscape	Support Rural Amenity - Public footpaths and views across the countryside are a core part of the local amenity. Harm to these views is harm to the public's reasonable enjoyment of the rural setting of the historic landmark.	Views to and from public footpaths are matters of amenity unless they make a specific contribution to the significance of heritage assets. Where relevant to specific assets, certain routes, footpaths etc. and their relationship to assets have been considered within the ES Chapter 9: Cultural Heritage [APP-067] , and ES Appendix 9.1 - Cultural Heritage Technical Baseline [APP-122] .
REP1-036/29	Heritage and Landscape	Any development that would industrialise the landscape visible from these viewpoints would, according to heritage planning principles, harm the public's understanding of the windmill's significance by damaging its setting	Views to/from the North Leverton Windmill in so far as they are relevant to the significance of the asset are considered at paragraph 6.49 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122] . It is acknowledged that there will be impacts to the significance of the windmill through changes to its setting, as is clearly outlined in
REP1-036/30	Heritage and Landscape	2.2. Primary Function and height	The Applicant notes these comments. The Scheme will in no way prevent or impact the continuation of these uses.

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		Much of the applicant's assessment and arguments put forward are based on the windmill's primary function of milling of flour. No consideration has been given to ancillary past and present functions that contribute to its significance. These were mentioned yesterday in our OFH1 submission and include: :	
REP1-036/31	Heritage and Education	Educational Resource: - an important educational site for schools and the general public, teaching about function, history, design, and purpose of windmills and England's industrial past. A dedicated Visitor Centre with interactive displays and historical documents supports this function.	
REP1-036/32	Community Facility	Community Hub - The windmill is a focal point for the local community, hosting events, family fun days, and special open days (e.g., vintage tractor displays, outdoor theatre). The site is available for anyone to use with permission.	
REP1-036/33	Socio-Economics	Tourism and Visitor Economy - The windmill attracts thousands of visitors and is a key feature of local heritage and walking trails. It contributes to the local visitor economy by drawing tourists to the area.	
REP1-036/34	Socio-Economics-Commercial	Commercial Activity - The windmill runs a shop, selling flour ground on-site, local products, and souvenirs. This provides a direct commercial link to its historic function and generates vital funds for its preservation and maintenance.	

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REP1-036/35	Heritage/ Public Benefit/ Education	Charitable Function - Managed by a registered charity, activities are focused on the preservation, protection and maintenance of the windmill for public benefit and the advancement of education.	
REP1-036/36	Heritage - Design	Communication – The windmill sails were and continue to be a method of communication with the wider community as described in the OFH1. The sails turning denotes the windmill is open, set at a St Andrew's cross means the miller is away, and set at St George's cross (or just passed) denotes a death.	As set out in the ISH1, whilst there may be areas where the views of this sail arrangement may be impeded, the Scheme will not affect the ability for the sails to continue to communicate in this way and the ability to view these messages will not be completely removed.
REP1-036/37	Heritage	The argument that windows are purely for light and not for views should not be accepted when assessing the impact on the public heritage value of the windmill and its historical landscape. Failing to assess the impact on secondary and ancillary function, which are all linked to the windmill's setting, rural character and sustainability, is a major omission, as harm to these activities will harm the overall public benefit provided by this unique heritage asset.	Public heritage value is not a term used in policy or legislation and therefore the Applicant has not considered this in its assessment.
REP1-036/38	Heritage/ Landscape	The applicant argued that there will be ample places to view the windmill, its setting and landscape, however we fail to see how this will be possible with 3m high solar panels from Year 1 and/or 3m mitigation screening at Year 15 looking towards the windmill from within the proposed development area, and a backdrop of solar panels when looking from Retford Road and other vantage points towards the Windmill. The proposed	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 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

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		<p>mitigation are both well above the height of the average person and, knowing these roads and footpaths very well, we fail to comprehend where these ample views will be. (Referring to EN010163-000085- 6.3.6 Appendix 6.2 Photomontages Part 2 - Winter.pdf. and specifically, Viewpoint 12 as an example of the impact of solar panels and screening.</p>	<p>currently border the southern extent of the Site on land closest to the windmill.</p>
REP1-036/39	Heritage	<p>The argument that views of the windmill do not matter is contrary to established UK planning law and policy, which highly values the conservation and enhancement of the historic environment for public enjoyment.</p>	<p>The Applicant does not consider that it has made an argument that “views of the windmill do not matter”. Please refer to the Applicant’s assessment of North Leverton Windmill, at paragraphs 6.47-6.51 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122] which includes consideration of views to/from the asset.</p>
REP1-036/40	Cumulative Impact	<p>2.3. Cumulative Impact</p> <p>The cumulative visual impact of a renewable energy project could significantly affect the windmill's setting and the ability to appreciate its value.</p>	<p>Cumulative impacts have been assessed as part of the assessment – see section 9.10 of ES Chapter 9 – Cultural Heritage [APP-067], including where relevant to the North Leverton Windmill. Where other projects have not identified any potential impacts to the asset, it is not appropriate to consider any cumulative impacts in conjunction with the Scheme.</p>
REP1-036/41	Cumulative Impact	<p>The addition of a large solar farm contributes to the cumulative industrialisation of the local area, which could be argued to push the setting of the windmill past a tipping point where its historic significance is fundamentally compromised.</p>	
REP1-036/42	Cumulative Impact	<p>The applicant has failed to consider the combined effect of this project with other nearby actual and potential developments. They must be included and considered when assessing the overall impact on the windmill's setting. With this development</p>	

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		being by far the largest in terms of footprint and proximity, we argue that this should elevate the 'minor impact' to a more significant one.	
REP1-036/43	Heritage/ Cumulative Impact/ Socio- Economics	When assessing any application for development which may affect the setting of a heritage asset, authorities should consider the implications of cumulative change. They should also consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going preservation and sustainability.	
REP1-036/44	Heritage – Public Benefit/Harm	3. Balancing Public Benefit and Harm The NPPF states that even "less than substantial harm" to a designated heritage asset must be weighed against the public benefits of a proposal. We challenge the applicant's claim that the effect is "not significant".	The policy position established in the National Policy Statement is that any harm to a designated heritage asset should require clear and convincing justification. This justification is set out in [Section 5 of the Planning Statement [APP-071] . In summary, 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 EN3 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. National planning policy supports the principle and there is a significant need for the Proposed Development.
REP1-036/45	Landscape - Public Benefit and Harm	The scale of the landscape harm to the windmill's setting is unacceptable and not adequately mitigated by the proposed benefits, creating a policy conflict.	The Applicant disagrees with this comment. 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

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			<p>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.</p> <p>Landscape and Visual Amenity 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. As previously mentioned, 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-071].</p>
REP1-036/46	Heritage - Setting	<p>The windmill sits within a very rural, historic landscape setting – characterised by open fields, lack of modern development and a strong visual connection to its historical purpose. It is built on higher ground for efficiency hence it is exposed and thus affords long uninterrupted sightlines across the landscape.</p>	<p>It is acknowledged that the windmill was likely constructed on higher ground for efficiency, however this is a purely functional point, and any increased visibility to/from the asset as a result is incidental. The relationship between the windmill and the surrounding landscape has been considered as part of the assessment – see paragraph 6.50 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122]</p>

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REP1-036/47	Heritage - Setting	The historic setting is generally free from large modern structures and extensive housing developments (the presence of the power station has already been noted but its footprint is small in comparison and is being demolished), preserving the original visual and historical context.	The Applicant has set out its position regarding the baseline visual characteristics of the Site in its LVIA.
REP1-036/48	Landscape	The applicant's argument that views from the windmill's windows are irrelevant would be seen as ignoring a key aspect of its historic and communal value.	The Applicant did not state that views from the windmill are irrelevant, they noted that the longer distance views afforded from the windmill are incidental, with the windows located to provide light for operation, rather than for any designed views – see paragraph 6.49 of Appendix 9.1 – Cultural Heritage Technical Baseline [APP-122] . The impacts as a result of the addition of visible built form are also considered are also considered at paragraph 6.7.18 of ES Chapter 9 – Cultural Heritage [APP-067] .
REP1-036/49	Heritage	Historic England's The Setting of Heritage Assets was referred to by the applicant. This document further supports our arguments that the harm this project causes outweighs public benefit with regard to economic benefit. “.....However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development.	The Applicant has not been presented with any evidence to suggest that the Proposed Development would result in any reduction in tourist numbers. 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
REP1-036/50	Heritage - Public Benefit	Generic benefits like renewable energy and a community fund are insufficient to override damage and harm to a nationally significant, irreplaceable heritage asset.	The Applicant disagrees with this. Residual impacts upon the setting of 6 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

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			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.
REP1-036/51	Heritage - Conclusion	<p>4. Conclusions</p> <p>The applicant has failed to accurately describe the windmill's importance and fully assess the impact on the tourism value and historic setting of the mill. The applicant's Environmental Statement (ES) acknowledges potential for a "moderate adverse effect" from some viewpoints, but assesses the overall impact as low.</p>	The Applicant has set out its assessment of the likely significant effects on the windmill in its environmental statement, particularly its chapter on Cultural Heritage. The Applicant has further provided clarification above, and in response to relevant representations.
REP1-036/52	Landscape and Visual Impact Assessment	<p>In its Landscape and Visual Impact Assessment (LVIA) for the Steeple Renewables Project, Steeples Renewables concluded that the impact on the Windmill and its setting would be "negligible" or result in a "minor adverse effect which is not significant" relying on distance, existing screening, topography and the context of the power stations.</p> <p>Simply put, as far as North Leverton Windmill is concerned, impacts are significant and adverse.</p>	<p>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.</p> <p>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.</p>
REP1-036/53	Landscape and Visual Impact Assessment	<p>4.1. Distance as a Mitigating Factor</p> <p>The assessment relies heavily on the physical offset between the proposed solar panels and the windmill.</p>	The Applicant disagrees landscape setting impacts of the Proposed Development on North Leverton Windmill are significant or adverse.

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		<p>https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010163-000055-Fig%202.1%20Indicative%20Site%20Layout.pdf</p> <p>page 5 indicated the nearest panels will be approximately 300m from the windmill and shows the expanse of panels (180 degrees).</p>	
REP1-036/54	Landscape and Visual Impact Assessment	<p>4.2. Intervening Vegetation and Topography</p> <p>The LVIA concluded that existing field boundary vegetation, mature garden hedging, and the general topography of the land would serve to "notably reduce potential views," especially from ground level. They argue this natural screening limits the visibility of the solar farm infrastructure. The Examining Authority has already undertaken an unaccompanied site visit and walked/driven the area so is aware that this simply is not true and the trust has offered an accompanied site visit so the Inspectors can see the views from the windmill tower. The applicant did not request access to the windmill for the assessment as they have only considered primary function which is not correct.</p>	<p>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, 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.</p> <p>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.</p>

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REP1-036/55	Landscape and Visual Impact Assessment	<p>4.3. Context of Existing Industrial Landscape</p> <p>The assessment places the proposed solar array within the existing context of the wider area, which already includes the large-scale West Burton Power Station and associated power lines/pylons. The argument being that the windmill's setting is already somewhat industrialised, making the additional impact of a solar farm "barely perceptible". However, the Examining Authority and the applicant are aware that the most industrial element (West Burton A Power Station) is already in the process of being demolished. The applicant has indicated that over 800,000 solar panels will be used, claiming it to be "barely perceptible". This is simply not true.</p>	<p>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.</p>
REP1-036/56	Transport/Heritage/Landscape and Visual Impact Assessment	<p>4.4. Sensitivity Rating</p> <p>In Chapter 13 assessment for traffic impacts, "listed buildings" and "tourist attractions" were given a "Low" sensitivity rating. While this specific rating was for transport, it indicates a general approach to how different receptors' sensitivity to the project was assessed and indicates inconsistency within the assessments and shows disregard for our heritage. View towards the windmill were not considered in the LVIA which is incomprehensible given the high significance of this asset. No approach was made by the applicant to the trust to consult with us to identify all potential concerns and local factors that should have influenced sensitivity ratings.</p>	<p>Chapters 2-16 of the Environmental Statement are topic specific and the conclusions reached are relevant to that topic. Differences in sensitivity or conclusions reached between the ES chapters is not an indication of inconsistencies within the Environmental Statement.</p> <p>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 <i>"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."</i></p>

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			<p>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.</p> <p>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.</p> <p>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.</p>
REP1-036/57	Heritage / Landscape and Visual Impact Assessment	<p>4.5. Professional Judgement</p> <p>The applicant's assessment uses professional judgement to determine the magnitude and significance of impacts, concluding that, the effects would be "non-significant".</p> <p>Nottinghamshire County Council commented that they usually expect 'moderate' to be 'significant' and also expressed concern for an overuse of professional judgement which is not justified in the evidence. In addition, XXX, Nottinghamshire's County Council Historic Building Conservation Team did not agree with the applicant's assessment and findings.</p>	<p>Please see Applicants response to Relevant Representations [REP1-008] reference RR-052/21 on pages 112-136.</p>

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REP1-036/58	Heritage / Landscape and Visual Impact Assessment/ NPS EN-1	4.6. Policy Conflict EN-1 Paragraph 5.8.9 -The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval. Paragraph 5.8.10:-The applicant's environmental statement should include a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance.	<p>The interested party's references to the NPS appears to reference incorrect paragraph number. The Applicant suggests the correct paragraphs are 5.9.36 and 5.9.10.</p> <p>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. 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].</p> <p>The Applicant has responded to national and local policy, need and weight in its Applicant Comments on Relevant Representations [REP1-008] at reference RR-035/28 on page 257 and 258.</p>
REP1-036/59	Landscape and Visual Impact Assessment/ NPS EN-3	EN-3 Paragraph 165: In the context of renewable energy, this paragraph requires plans to "design policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative impacts. Paragraph 174: This general policy states that "Planning policies and decisions should contribute to and enhance the	<p>The Applicant disagrees with this comment. The paragraphs referred to do not follow the Paragraph number referencing in NPS EN-3 and do not appear to be from NPS EN-3. It also appears to be the NPPF 2012 version that is not relevant planning policy for the Scheme.</p> <p>The Applicant has responded to national and local policy, need and weight in its Applicant Comments on Relevant Representations [REP1-008] at reference RR-035/28 on page 257 and 258.</p>

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		<p>natural and local environment by... recognising the intrinsic character and beauty of the countryside". This is the overarching principle that mandates the consideration of countryside character.</p>	
REP1-036/60	Heritage/ Landscape and Visual Impact Assessment/ NPPF	<p>NPPF</p> <p>The project conflicts with two of the three overriding objectives of NPPF in terms of social and environmental objective.</p> <p>We argue that the presumption in favour of sustainable development should not apply because the introduction states</p> <ul style="list-style-type: none">• the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area [which includes designated heritage assets]; or• any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>Paragraph 199 - local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development affecting the asset's setting). They should take this assessment into account when considering the impact of a proposal.</p> <p>Paragraph 200 - Emphasizes that "Great weight should be given to the asset's conservation (and the more important the</p>	<p>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. 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].</p> <p>Paragraphs 4.4.1 to 4.4.3 of the Planning Statement [APP-182] specifically considers the NPPF.</p> <p>Paragraph 4.4.2 sets out Paragraph 5 of the NPPF states "<i>The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework).</i>"</p> <p>The Planning Statement, therefore, only assesses the alignment of the Proposed Development against the NPPF.</p> <p>Section 6.4 of the Planning Statement [APP-182] specifically considers Cultural Heritage and Archaeology. It concludes In the case of the Proposed Development, which is time limited (NPS EN-3 2.10.160), the significant public</p>

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		<p>asset, the greater the weight should be)". This is a key principle in this debate.</p> <p>Paragraph 202 - This is the central policy for weighing harm where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing optimum viable use.</p> <p>Paragraph 206 -Deals with the cumulative impact, stating that the cumulative effects of multiple developments on the historic environment should be considered.</p>	<p>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.</p>
REP1-036/61	Heritage/ Cumulative Impact / Socio-Economics	<p>This project should be rejected on the grounds of disregard of the Windmill, effects on its setting and views, cumulative impact and the harm to our developing tourism industry which all contribute significantly to the economic growth of this area.</p>	<p>The Applicant refutes this comment in its entirety.</p> <p>The Assessment has clearly and robustly set out the significance of this asset and the contribution</p> <p>It is not credible to suggest that there has been disregard for the effects of the Scheme on this asset given it has been assessed as experiencing a Minor Adverse Effect, less than substantial harm.</p> <p>It is for the decision-maker to weigh this harm against the benefits of the Scheme in the planning balance.</p>
REP1-036/62	Heritage/ Landscape and Visual	<p>The applicant stated that there would be ample views, when walking anywhere within the proposed development site. The solar panels are 3m high with mitigation screening eventually growing to a similar height. These are both well above the</p>	<p>As already stated, the PRoW from which there may be views are not heritage assets in their own right.</p>

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		height of the average person, we fail to comprehend where these ample views be. North Leverton Windmill Trust Fields for Farming Community Objection Group	The views from the south of the asset will remain unaffected. The views on the approach along the roads will be unaffected.
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Table 2-20: Adrien Conn

ID	Theme	Verbatim Comment	Applicant Response
REP1-043/1	Land Use	The quality of the land in and around Sturton le Steeple by the applicant's own "testing" indicates that 88.3% of the development would be on agricultural land of grade 3a OR ABOVE (found on page 21, of Chapter 15: Land Use and Agriculture Environmental Statement – Volume 1).	Please see the Applicants common response E and F found on page 285-286 of the Applicant Comments on Relevant Representations [REP1-008].
REP1-043/2	Land Use	This should be maintained under DEFRA guidance for arable use. Period.	
REP1-043/3	Soil Quality	The applicant's "testing" data is dubious at best. How many soil samples were taken across the 1700 acres to be developed on? Or did they simply rely on historic soil data comprised in the 1970's and 80s?	A detailed soil survey was carried out by Roberts Environmental Ltd as part of the ALC, and is reported at [APP-131], which is Appendix 15.1 to the Environmental Statement (ES). Soil was assessed on a 100 metre regular grid, and the results have been described and assessed in Chapter 15 of the ES [APP-072]. The soil types found are described and mapped in the ALC report.
REP1-043/4	Soil Quality	As soil quality can vary across just a few acres of the same field, then a comprehensive survey showing the true soil quality	

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		should have included approximately 850 samples (based on one sample per two acres). Why was this not undertaken?	
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Table 2-21: Emily Byatt

ID	Theme	Verbatim Comment	Applicant Response
REP1-047/1	Health Impact Assessment	<p>1. Introduction</p> <p>This representation sets out significant concerns regarding the health and wellbeing impacts of the Steeples Renewable Project and identifies failures in both:</p> <ol style="list-style-type: none">1. the Applicant's Health Impact Assessment (HIA) (EN010163/APP/7.2), and2. the consultation process, which does not meet the required legal standards as defined by the Gunning Principles. <p>The evidence demonstrates that the proposal presents substantial risks to physical and mental health, community wellbeing, and health equality, many of which have not been adequately assessed, communicated, or mitigated.</p>	Noted, see below.
REP1-047/2	Legal Framework	<p>2. Legal Framework</p> <p>2.1 The Gunning Principles – Requirements for a Lawful Consultation</p> <p>The consultation process must comply with the four</p>	In respect of Item 2.1, the Applicant would note that the Gunning Principles are not directly relevant to the Scheme on the basis that the Gunning principles seek to establish the principles of a legitimate public consultation

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	Health Impact Assessment EIA	<p>Gunning Principles, established in <i>R v Brent ex parte Gunning</i> (1985) and endorsed by later case law including <i>Moseley</i> (2014):</p> <ol style="list-style-type: none">1. Formative Stage – the proposal must not be predetermined.2. Sufficient Information – consultees must receive clear, accessible information.3. Adequate Time – consultees must be given sufficient time to respond.4. Conscientious Consideration – responses must be genuinely considered. These principles apply directly to nationally significant infrastructure projects, where affected communities must be able to fully understand risks and provide informed comment. <p>2.2 Health Impact Assessment and EIA Principles</p> <ul style="list-style-type: none">• Under standard HIA and EIA practice, an assessment must:• identify all relevant health determinants (mental, social, physical, environmental),• assess direct and indirect health pathways,• consider cumulative impacts, • evaluate effects on vulnerable groups, and	<p>for the basis of public authority decision making. In this case, the Applicant has carried out consultation pursuant to its development proposals within strict statutory requirements. These statutory requirements, which stem through section 42 Planning Act 2008 and its secondary regulations, establishes a process of consultation entirely in keeping with the stated principles. It should be noted that this consultation carried out was in accordance with the requirements of the Planning Infrastructure (Environmental Impact Assessment) Regulations 2017. The Applicant has provided a Consultation Report [APP-047] which establishes the measures the Applicant took to provide sufficient information including non-statutory early engagement, which the Applicant was not bound by law to carry out. As part of its statutory consultation, the Applicant provided a Statement of Community Consultation for comment to the local authorities (Bassetlaw District Council and Nottinghamshire County Council outlining the Applicant's intended method of consultation. The Applicant received comments on this proposal and set out how it had regard to this consultation in Table 12 of the Consultation Report. The Applicant carried out its consultation in accordance with the Statement of Community Consultation and provided a period of consultation that was more than the minimum period set out by statute, being 6 weeks between 20 January 2025 and 3 March 2025. The Consultation Report reports on the information provided as part of this consultation. Section 6 of the Consultation Report sets out how the Applicant has had regard to comments received as part of the consultation. Adequacy of Consultation Responses (AoC-001-012) are provided in the Examination Library from local authorities. There have been no issues raised</p>
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		<ul style="list-style-type: none">• present findings in a way that is transparent and accessible to affected populations. <p>The Applicant's HIA (EN010163/APP/7.2) does not meet these requirements.</p>	<p>by these local authorities with the adequacy of the Applicant's consultation as part of the Application.</p> <p>In respect of Item 2.2, the Applicant acknowledges that the submitted HIA [APP-183] does not include coverage of cumulative impacts at this present time. If such an assessment were to be undertaken, it is considered that there would be no change to the range of effects identified as having potential to impact on the sensitive receptors and groups vulnerable to change. This includes both direct and indirect physical and mental health effects, as is presented in the submitted HIA. Ultimately, there are not considered to be any effects outside the existing scope of the HIA for the Proposed Development in isolation that would alter the conclusions regarding potential positive and negative effects, including their likelihood and severity, if a cumulative assessment were undertaken.</p> <p>The Applicant reiterates that the submitted HIA does include other listed requirements as follows:</p> <ul style="list-style-type: none">- Identification of all relevant health determinants (mental, social, physical, environmental) – see Section 4: Methodology, and Section 7: Impact assessment of the submitted HIA [APP-183].- Assessment of direct and indirect health pathways – see section 7: Methodology of the submitted HIA [APP-183] where direct and indirect cause and effects are considered and assessment identified in respect of each relevant sensitive receptor.
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			<ul style="list-style-type: none">- Evaluation of the effects on vulnerable groups - see the submitted HIA [APP-183] Section 4: Methodology which gives context to the identification of relevant sensitive receptors and vulnerable groups; Section 5: Baseline which presents baseline data and collates evidence for those re sensitive receptors and vulnerable groups considered relevant to be assessed; and Section 7: Impact assessment as to the assessment of health and wellbeing effects undertaken (1) for each development phase, (2) for each health and wellbeing determinant, and (3) for each of the identified relevant sensitive receptors and vulnerable groups.- Presentation of assessment findings in a way that is transparent and accessible to affected populations – section 7: Impacts of the submitted HIA [APP-183] includes a named row for each of the sensitive receptors and vulnerable groups within each of the health and wellbeing determinants. Each of these rows estimates likelihood, magnitude, and overall impact which is informed by the review and presentation of synergistic effects across the wider application and submitted impact assessments.
REP1-047/3	Mental Health/Health and Wellbeing Livelihoods	3. Summary of Key Concerns 3.1 Under-assessment of Mental Health and Community Wellbeing Impacts	The Applicant notes that HIA [APP-183] presents a methodology which aims to facilitate an assessment of the range of negative and positive potential direct and indirect physical and mental effects of the Proposed Development on a wide range of relevant sensitivity receptors. Each of the key concerns raised by this Consultee are addressed within the HIA (see Section 7: Impact assessment). The evidence collated is drawn from the wider application

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		<p>Significant stress, anxiety, and feelings of powerlessness are already being experienced by residents due to the scale of the proposal and repeated industrial consultations in the area.</p> <p>3.2 Loss of Countryside and Access to Nature</p> <p>The proposal removes accessible natural landscapes essential to physical activity and mental wellbeing.</p> <p>3.3 Impact on Farmers and Rural Livelihoods F</p> <p>arming communities, already at higher risk of mental-health harm, face job insecurity and potential displacement.</p> <p>3.4 Physical Health Risks Acknowledged – But Not Sufficiently Assessed</p> <p>The Applicant's own HIA identifies risks such as water contamination, fire hazards, and flooding, yet provides insufficient explanation of likelihood, mitigation, or residual risk.</p> <p>3.5 Consultation Does Not Meet the Gunning Principles</p> <p>Key health risks were not clearly communicated, limiting the community's ability to respond with "intelligent consideration."</p>	<p>package and relevant impact assessment which have potential for direct and indirect effect on physical and mental health of the various receptors. For each of the health and wellbeing determinants, consideration of the likelihood of effect, severity of impact and ultimate the significant of effect (including whether positive, negative or neutral) is identified for each of the sensitive receptors / vulnerable groups.</p> <p>The HIA must be read in conjunction with the full suite of statutory consultation materials issued during the Applicant's Section 42 consultation, including the Preliminary Environmental Information Report (PEIR), and the subsequent Environmental Statement prepared and submitted under Section 56. These documents collectively provided consultees with the necessary information to understand potential physical and mental health impacts and how these were assessed throughout the EIA process.</p> <p>The Applicant undertook consultation in full accordance with the statutory framework set out under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Consultation Report [APP-047] sets out in detail the measures undertaken to provide comprehensive, accessible, and early information to consultees, including non-statutory engagement that exceeded legal requirements. As part of the statutory process, the Applicant prepared a Statement of Community Consultation (SoCC) for comment by Bassetlaw District Council and Nottinghamshire County Council and subsequently updated its approach in line with the feedback received, as recorded in Table 12 of the Consultation Report.</p>
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		<p>The Applicant delivered a statutory consultation period exceeding the minimum statutory requirement, running for six weeks between 20 January 2025 and 3 March 2025. Section 6 of the Consultation Report explains how the Applicant had regard to the comments received, and Adequacy of Consultation responses (AoC-001-012), published in the Examination Library, confirm that the relevant local authorities raised no concerns regarding the adequacy of the consultation.</p> <p>Across the Environmental Statement, including the HIA, PEIR materials and topic-specific assessments, the Applicant presented clear and sufficient information for consultees to understand potential physical and mental health risks, associated mitigation, and the likely significant environmental effects. This included detailed assessment of cumulative and in-combination effects, as documented in the <i>Environmental Impact Assessment Methodology and Public Consultation</i> [APP-060], the <i>Cumulative Schemes Plan</i> [APP-142], and the Preliminary Environmental Information Report Non-Technical Summary.</p> <p>In light of the comprehensive engagement undertaken and the breadth of information provided across the ES, the Applicant maintains that consultees were furnished with sufficient and appropriate material to understand the potential impacts of the Proposed Development, including those relating to community health and wellbeing. Furthermore, no issues have been raised by local authorities regarding the adequacy of consultation, and the Applicant is confident that the statutory and best-practice requirements for consultation have been fully met.</p>
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REP1-047/4	Mental Health Health Impact Assessment	<p>4. Detailed Evidence and Analysis</p> <p>4.1 Mental Health, Stress, and Anxiety (Direct and Indirect Impacts)</p> <p>The local population reports substantial anxiety, stress, and fear for the future caused by:</p> <ul style="list-style-type: none">• the scale of the development,• the industrialisation of the rural environment, and• repeated consultation cycles for multiple overlapping projects. <p>These impacts have not been sufficiently assessed in the HIA.</p> <p>Cross-reference to Applicant's HIA:</p> <p>The HIA states the proposal will "lessen health inequality," yet it simultaneously acknowledges potential health risks. It does not include an adequate evaluation of mental health pathways, stressful cumulative impacts, or the lived experience of residents already reporting harm.</p> <p>Legal relevance (Gunning Principle 2):</p> <p>These mental-health impacts were not clearly explained in the consultation materials. As a result, consultees could not form an informed view, undermining the lawfulness of the process.</p>	<p>The Applicant's HIA [APP-183] makes no claim whatsoever regarding the Proposals' ability to lessen health inequality. The quote provided is not found in the HIA. Instead, it presents a methodology which aims to facilitate an assessment of the range of negative and positive potential direct and indirect physical and mental effects of the Proposed Development on a wide range of relevant sensitivity receptors.</p>
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REP1-047/5	Loss of Countryside Physical Wellbeing Health	<p>4.2 Loss of Countryside, Nature, and Physical Wellbeing</p> <p>Residents emphasise that walking, cycling, and spending time in nature form essential parts of their healthy lifestyle, physical activity, and family life.</p> <p>The proposal would enclose villages with industrial development, removing:</p> <ul style="list-style-type: none">• valued landscapes,• accessible walking routes,• wildlife-rich environments, and• restorative natural views. <p>HIA Deficiency:</p> <p>The Applicant fails to quantify or meaningfully assess these wellbeing losses. These are significant determinants of health and must be assessed under HIA and EIA principles.</p> <p>Gunning concern (Principle 2):</p> <p>The public were not given clear, accessible information explaining how the project would transform the landscape or the health implications of that change.</p>	<p>The Applicant's HIA [APP-183] presents a methodology which aims to facilitate an assessment of the range of negative and positive potential direct and indirect physical and mental effects of the Proposed Development on a wide range of relevant sensitivity receptors. Each of the key concerns raised are addressed within the HIA (see Section 7: Impact assessment). The evidence collated is drawn from the wider application package and relevant impact assessment which have potential for direct and indirect effect on physical and mental health of the various receptors. For each of the health and wellbeing determinants, consideration of the likelihood of effect, severity of impact and ultimate the significant of effect (including whether positive, negative or neutral) is identified for each of the sensitive receptors / vulnerable groups.</p> <p>The Health Impact Assessment should be read in the context of all the consultation material provided during s42 statutory consultation (which included the preliminary environmental impact report) and thereafter, the environmental statement provided as part of the s56 consultation prior to and part of the examination of the Application. The Applicant considers that there is sufficient information provided in its application materials for consultees to understand any physical health risks, and the Applicant's environmental statement has provided an assessment as to the likely significant effects, influenced by these risks.</p> <p>As per the above, the Applicant's consultation was in accordance with statutory requirements, and no issues have been raised by local authorities as to the adequacy of that consultation.</p>
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REP1-047/6	Socio-economic Health	<p>4.3 Socio-economic Health Impacts on Farmers</p> <p>Residents raised that local farmers face job insecurity and potential displacement. This is particularly concerning because:</p> <ul style="list-style-type: none">• farmers are an at-risk mental health group,• financial and occupational instability increases suicide risk, and• loss of farmland affects community identity and rural wellbeing. <p>HIA Deficiency:</p> <p>The Applicant's HIA does not address these vulnerabilities or provide meaningful analysis of impacts on rural livelihoods.</p>	<p>There is no specific reference to agricultural workers in NPS EN-1 or EN-3 in respect of there being a direct or indirect link to their physical and / or mental health as a result of a development. Nevertheless, a number of receptors and groups vulnerable to change have been identified within the HIA which could include, but not be limited to, existing agricultural workers. These are as follows:</p> <ul style="list-style-type: none">• People on low incomes.• Existing residents in nearby communities.• People using existing / future services in the local area.• Existing businesses in the local area. <p>Note, in total there are eight receptors identified and assessed within the HIA; these listed here are considered to be relevant to agricultural workers.</p> <p>As such, the direct and indirect effects on these groups, inclusive of agricultural farm workers, including physical and mental health effects, have been assessed for all development stages and for the whole range of health and wellbeing determinants, as set out in the Health Impact Assessment (HIA) [APP-183].</p>
REP1-047/7	Physical Health	<p>4.4 Physical Health Risks Identified by the Applicant</p> <p>The Applicant's HIA acknowledges risks including:</p> <ul style="list-style-type: none">• water contamination,• fire risk,	<p>The Applicant notes that HIA [APP-183] presents a methodology which aims to facilitate an assessment of the range of negative and positive potential direct and indirect physical and mental effects of the Proposed Development on a wide range of relevant sensitivity receptors. Each of the key concerns raised by this Consultee are addressed within the HIA (see Section 7: Impact</p>

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		<ul style="list-style-type: none">• flooding. <p>Yet it fails to provide sufficient evidence, modelling, assessment of probability, or accessible explanation for residents.</p> <p>Gunning Principle 2 failure:</p> <p>If risks are acknowledged but not clearly communicated or assessed, consultees cannot evaluate their significance, making the consultation legally deficient.</p>	<p>assessment). The evidence collated is drawn from the wider application package and relevant impact assessment which have potential for direct and indirect effect on physical and mental health of the various receptors. For each of the health and wellbeing determinants, consideration of the likelihood of effect, severity of impact and ultimate the significance of effect (including whether positive, negative or neutral) is identified for each of the sensitive receptors / vulnerable groups.</p> <p>The Health Impact Assessment should be read in the context of all the consultation material provided during s42 statutory consultation (which included the preliminary environmental impact report) and thereafter, the environmental statement provided as part of the s56 consultation prior to and part of the examination of the Application. The Applicant considers that there is sufficient information provided in its application materials for consultees to understand any physical health risks, and the Applicant's environmental statement has provided an assessment as to the likely significant effects, influenced by these risks.</p> <p>As per the above, the Applicant's consultation was in accordance with statutory requirements, and no issues have been raised by local authorities as to the adequacy of that consultation.</p>
REP1-047/8	Health Impact Assessment	<p>5. Failures of the Consultation (Gunning Principles)</p> <p>5.1 Principle 1 – Formative Stage</p> <p>Residents report a sense of predetermination and “being bombarded with industrial projects,” suggesting uncertainty about whether the consultation was genuinely open.</p>	<p>Please see the Applicant's response at REP1-047/2 in relation to the applicability of the Gunning principles.</p> <p>In respect of item 5.2 during the Statutory Consultation the Applicant provided detailed information concerning the cumulative and in-combination effects of the Proposed Development alongside other</p>

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		<p>5.2 Principle 2 – Sufficient Information</p> <p>The consultation materials did not give accessible, comprehensible information about:</p> <ul style="list-style-type: none">• mental health impacts,• cumulative effects of multiple projects,• risks identified within the HIA. <p>Therefore, “intelligent consideration” was not possible.</p> <p>5.3 Principle 3 – Adequate Time</p> <p>Overlapping consultations created consultation fatigue, reducing capacity to meaningfully participate.</p> <p>5.4 Principle 4 – Conscientious Consideration</p> <p>Given the Applicant’s HIA minimises or omits key community-reported harms, there is doubt that responses have been given meaningful consideration.</p>	<p>relevant local schemes. This information was presented within the Preliminary Environmental Information Report: Non-Technical Summary. Supporting documents [APP-060] Environmental Impact Assessment Methodology and Public Consultation and [APP-142] Cumulative Schemes Plan were submitted as part of the Application and set out the Applicant’s methodology for identifying and assessing the potential effects arising from other ‘reasonably foreseeable’ developments within the vicinity of, and in the context of the Proposed Development.</p>
REP1-047/9	Conclusion	<p>6. Conclusion</p> <p>It is my view that the Steeples Renewable Project presents substantial and inadequately assessed threats to the health and wellbeing of the local population.</p> <p>The Applicant’s Health Impact Assessment is deficient in its treatment of mental health, cumulative pressures, socio-economic impacts, and acknowledged physical risks.</p> <p>Furthermore, the consultation process does not satisfy the Gunning Principles, rendering it procedurally flawed.</p> <p>For these reasons, the project—as currently presented—cannot be considered to have properly evaluated or mitigated its health</p>	<p>Please see above for the Applicant’s position.</p>

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		<p>impacts, nor to have engaged lawfully or meaningfully with the affected community.</p> <p>I recommend that the applicant refer to Suffolk County Council's document named Energy and Climate Adaptive Infrastructure Policy Community Engagement and Wellbeing Supplementary Guidance Document for a framework on how to appropriately engage and include our community to reduce the negative impact to our health and wellbeing.</p> <p>I kindly ask the examiners to consider identifying 'health and wellbeing' as a principle issue in its own right</p>	
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Table 2-162: Sharon McDonald

ID	Theme	Verbatim Comment	Applicant Response
REP1-056/1	Soil and Agriculture	Res's own soil and agricultural survey reports that 88.3% of the land being considered for the Solar project is Grade 1.2 and 3A. The Government's own recommendations are that this quality of land should not be used for solar, other than in dire situations, and this is definitely not one of those.	The Applicant notes this comment and has responded in the Applicant Comments on Relevant Representations [REP1-008] at reference RR-019 on pages 306 to 309.
REP1-056/2	Biodiversity	The industrialisation of the land and the use of security fencing will change the biodiversity. Since the original comments I personally have taken a deeper interest in the wild life entering the fields and our property boundary, We have many badger	

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		latrines, deer and hares in the fields, we also have many species of birds, this ecology will be damaged for ever. If all of the ecology in the area is damaged due to the vast amount of Solar projects planned for the surrounding area, damage will be done to the whole environment that can never be reversed	
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