

Nottinghamshire County Council

Local Impact Report – Steeple Renewable Project

Contents

1. Introduction	3
2. Project Proposal	5
3. Relevant Planning History	6
4. Planning Policy Context.....	12
5. Assessment of Impacts.....	12
5.1. Built Heritage.....	12
5.2 Buried Heritage	15
5.3 Biodiversity.....	20
5.4 Landscape and Visual	23
5.5 Minerals and Waste Management.....	25
5.6 Traffic and Transport	28
5.7 Public Rights of Way.....	29
5.8 Local Flood Risk	33
6. Development Consent Order	40
7. Summary	43

1. Introduction

- 1.1. Nottinghamshire County Council (NCC) has prepared this report in accordance with the advice and requirements set out in the Planning Act 2008 and the Nationally Significant Infrastructure Projects: Advice for Local Authorities published by the Planning Inspectorate in August 2024.
- 1.2. The guidance states that when the Planning Inspectorate decides to accept an application for a Development Consent Order (DCO) it will invite the relevant local authorities to prepare a Local Impact Report (LIR). The LIR should give details of the likely impact of a project on the local authority's area and should indicate where the local authority considers that the proposed development would have a positive, negative or neutral effect on their area.
- 1.3. The LIR may include any topics that the local authority considers to be relevant to the impact of the development within its administrative area and is a means by which its existing body of knowledge and evidence on local issues can be fully and robustly reported. It is intended to be a technical assessment of impact and does not attempt to conclude on the acceptability of the proposals. The LIR therefore neither sets out objection or support for the application.
- 1.4. In producing the LIR, the County Council has not sought the views of local parish councils and local interest groups as to any particular matters that should be reflected in the report because the parish councils and other local interest groups have the opportunity, through the consultation process, to make their observations direct to the Planning Inspectorate.
- 1.5. The LIR only covers matters and issues where NCC has a statutory function or holds expertise at an officer level, supplemented by external advice as needed. The topics covered are listed below. For all other matters not listed below, NCC will defer to Bassetlaw District Council (BDC), including matters relating to compliance with their local development plan:
 - Historic Environment – Built
 - Historic Environment - Buried
 - Biodiversity
 - Landscape and Visual
 - Waste Management
 - Traffic and Transport
 - Public Rights of Way
 - Local Flood Risk
- 1.6. Unless otherwise specified, the LIR only relates to the proposed development insofar as it affects the administrative area of Nottinghamshire.
- 1.7. For each matter above, the LIR will outline the key local issues relevant to the part of the proposal that is located within Nottinghamshire and the extent to which the applicant addresses the issues by reference to the application documentation, including the Environmental Statement (ES) and associated appendices and management plans. The LIR will comment on the effect they would have on the area, either positive, negative or neutral and the magnitude of that effect.

1.8. The County Council is a host authority to the proposed Steeples Solar Farm project. It has prepared this Local Impact Report in light of its statutory responsibilities, especially in respect of being the local highway authority including responsibility for rights of way, lead local flood authority, planning authority for mineral and waste development and as the managers of the Historic Environment Record, employing a County Archaeologist function. It is also providing comments on landscape and visual matters through its landscape service linked with its highway agency Via East Midlands.

1.9. The County Council and its controlling administration has long supported the transition of Nottinghamshire's legacy of power stations alongside the River Trent to becoming creators and suppliers of green energy. Nottinghamshire through its coal industry in the 20th Century supplied coal fired power stations and has a proud legacy of the energy industry and electrical installations within the Trent Valley. Local communities have benefited from employment within the energy sector and it is the County Councils ambition that the Trent Valley continues to be at the forefront of clean green energy development, using the existing power stations as the basis.

1.10. For this reason the County Council worked with Bassetlaw District Council to successfully bid for West Burton to be the home of the testing and scaling of the STEP approach to nuclear fusion in the UK. Proposals are currently being prepared for this project to be subject to consultation before submission through the nationally significant infrastructure project regime in 2028.

1.11. The site of the former Cottam power station to the south of the Steeples site is set for transformation into the UK's first nuclear-powered data centre campus. The Cottam data centre project will use Small Modular Reactors to provide clean power for data centres at the site.

1.12. The East Midlands Combined County Authority and the East Midlands Mayor are supporting the concept of a Super Cluster of sites along the Trent Valley from Gainsborough to Newark to assist in marketing the area as a hub for future green energy projects.

1.13. We cite these projects to illustrate that there are already projects likely to happen and supported by either national or local government which will impact on the locality and the Steeples project must be considered considering the overall impact of the widespread developments planned to take place. It cannot be viewed entirely in isolation.

1.14. The new administration of the County Council, elected in May 2025 continues to be pro-environment, pro the creation of secure, affordable and safe energy. It continues the stance of the previous administration in being against the development of large amounts of agricultural land for ground mounted solar. For large-scale solar farms that are NSIPs, the [national policy statement for renewable energy infrastructure](#) advises that such solar farms should be sited on previously developed and non-agricultural land.

1.15. The County Council administration takes issue with the concept of "net zero" the legally binding target to reach net zero greenhouse gas emissions by 2050 which is driving the Governments aim of delivering clean power by 2030 through low carbon power sources producing most electricity generation in Great Britain.

1.16. This approach is the basis for the explosion in projects for large solar developments in Lincolnshire and Nottinghamshire within easy access to the grid connections at the former power

stations. The approved Gate Burton, Cottam, West Burton and Tillbridge solar projects at nationally significant infrastructure (NSIP) projects in Lincolnshire involve underground cabling to the Nottinghamshire power stations. At present in addition to Steeples, there are NSIP proposals at North/South Clifton (One Earth Solar Farm) and west of Newark (Great North Road). This is in addition to the many solar developments approved by the local planning authorities through the normal planning application process. We are showing the extent of all these projects on a composite plan which is appended to this Local Impact Report Appendix 1. The cumulative impact of this growing list of approved projects will change the face of the wider Trent Valley area and impact on the way the valley is perceived. Whilst there have always been elements of non-agricultural industry in the Nottinghamshire countryside, these proposals are resulting in the wholesale transformation of green fields into glass and steel. We acknowledge that such projects are seen as temporary and reversible but the impact on local people will be felt for several generations.

1.17. In addition to the many solar projects in this area, the Trent Valley is also proposed to accommodate a new power line promoted by National Grid Energy Transmission (NGET) connecting land north of the Humber with High Marnham power station which will directly cross the site of the Steeples renewable project to the west of Sturton le Steeple. It appears to the County Council that the two projects are in conflict, and the promoters have reached no satisfactory agreement over the compatibility of their proposals.

1.18. We consider that the Steeples project could potentially prejudice delivery of the NGET power line project which may be seen as a higher priority since it is important to have power lines to distribute energy from offshore low carbon production sites into the country. Other energy developments should work around such developments.

1.19. These opening remarks serve to illustrate the wider impact of this proposal with others. Local residents have asked for a strategic plan to guide future developments. The present Bassetlaw Local Plan does not adequately reference the many new projects which are emerging. The County Council wishes to work constructively with Bassetlaw District and local residents to create a planning framework to help guide and manage the multiplicity of projects coming forward in this corner of Nottinghamshire.

1.20. We understand that Bassetlaw DC have not submitted relevant representations to date regarding the Steeples solar project, and we are unsure if they are planning to submit a Local Impact Report. We have therefore sought to be as comprehensive as possible to identify the significant impacts of this project from our perspective and seek to safeguard our local communities.

2. Project Proposal

2.1. The Proposed Development is defined under sections 14(1)(a) and 15(2) of the Planning Act 2008 as a NSIP, as it consists of construction of an onshore generating station in England exceeding 50 megawatts (MW). Associated development (e.g., PV module mounting infrastructure, inverters and transformers) and other ancillary works are also proposed as part of the Proposed Development.

2.2. The order limits of the Steeples Renewable Project consist of approximately 898ha of land comprising of predominantly agricultural land. The site includes also includes part of the existing West Burton Power Station site covering the area around the existing 400kV substation, and a number of local roads:

- Sections of Wheatley Road; Station Road; Gainsborough Road, and Wood Lane in the north-western portion of the Site; and
- Littleborough Road, and Common Lane, in the eastern portion of the Site.

2.3. The nearest settlement to the Site is Sturton le Steeple. There is a network of roads located both within the Site and adjacent to the boundary. The River Trent lies adjacent to the eastern boundary of the Site.

2.4. To allow sufficient flexibility for the final design to be confirmed post consent, the applicant has applied the principles of the 'Rochdale Envelope' to inform the environmental assessment work. This involves the technical assessments being undertaken and based on a defined 'envelope' within which the project will be delivered, featuring maximum and minimum design parameters, so that an assessment of the reasonable 'worst case scenario' can be undertaken. Each environmental topic has used the worst-case parameters within the 'Rochdale Envelope' to determine the potential for significant effects and identify suitable mitigation measures.

2.5. It is currently anticipated that the earliest the Proposed Development will commence commercial operation is the year 2029. It is anticipated that sections of the Proposed Development will commence their electricity generation in stages, rather than await completion of the Proposed Development before any renewable energy enters the National Grid.

2.6. The operational life of the Proposed Development is to be up to 40 years and decommissioning is therefore estimated to take place no earlier than the year 2069. Decommissioning is expected to span approximately 18 months – two years and will be undertaken in one phase.

3. Relevant Planning History

3.1. NCC is the Minerals and Waste Planning Authority for Nottinghamshire and is therefore responsible for determining planning applications for such developments. NCC is also responsible for determining applications submitted for its own developments.

Background to Development Proposal

3.2. Planning permission was originally granted for the development of a sand and gravel quarry including the construction of a new access road and erection of processing plant, ancillary buildings and a wharf facility with restoration to agriculture, woodland and water areas for amenity and nature conservation after-uses at Sturton le Steeple in October 2008 under reference 1/46/06/00014.

Table 1 - Planning History Nottinghamshire County Council, Applications of Note

Application Reference	Site	Development Description	Distance from Project (km)	Application Status
1/46/06/00014/	Land to the north & east of Sturton le Steeple	The extraction of sand & gravel, construction of new access, erection of processing plant, ancillary buildings & wharf facility. Restoration to agriculture, woodland & water areas for amenity & nature conservation end uses.	Within site limits	Granted October 2008 In March 2012 planning permission was granted under reference 1/46/11/00002/R to extend the implementation deadline set out within the original consent to 8 March 2017.
1/46/11/00002/R	Land to the north & east of Sturton le Steeple	Application to extend the time limit for implementation of sand and gravel extraction, previously granted under planning permission 1/46/06/00014	Within site limits	Granted March 2012
1/16/00354/CDM	Land to the north & east of Sturton le Steeple	to enable the quarry access road to be constructed in two stages: • The initial stage of developing the quarry	Within site limits	Granted May 2016

		<p>access road relates to the construction of a 500m section of bound surface adjacent to Gainsborough Road (and the remainder of the haul road laid with stone) and for the use of this road for the removal of the first 100,000 tonnes of mineral from the site.</p> <ul style="list-style-type: none"> • The second stage, which has not yet been constructed, includes the full surfacing of the haul road along its entire length. 		
1/16/00354/CDM		<p>Vary conditions 8 and 11 of planning permission 1/46/11/00002/R to enable the quarry access road to be constructed in two stages. The initial stage incorporates the construction of a 500m section of bound surface adjacent to Gainsborough Road which shall be used for the removal of the first 100,000 tonnes of mineral, thereafter the</p>		<p>Granted May 2016 - The 2016 planning permission was implemented in September 2016 through the construction of the first 500m section of the haul road with a bound surface, but the full length of the road in stone surfacing was not constructed. A small quantity of mineral was extracted in March 2017 and utilised for site engineering</p>

		second stage shall provide for the full surfacing of the haul road along its entire length for the removal of the remaining mineral in the permitted reserve.		purposes, but no mineral has yet been removed from the site.
1/20/00605/CDM		to defer the restoration obligations imposed under Condition 68 of planning permission 1/16/00354/CDM to delay the submission of a revised restoration scheme for the quarry until after the 15 th April 2022. A further s73 permission was granted in April 2022 to again afford more time for mineral extraction and postpone early restoration.		June 2020
1/22/00047/CDM		Variation of the trigger date of conditions 67 and 68 to 31 December 2024 to afford sufficient time for additional surveys, to secure all necessary approvals under non-planning regimes and		This is now the operational permission. Non-material amendments have been approved with respect to completing the rest of the access road. This has now been built out. Other

		implementation works to take place prior to extraction recommencing		preparatory works are ongoing at this time, including the construction of the main processing plant.
--	--	---	--	--

4. Planning Policy Context

4.1. The Secretary of State (SoS) is required to have regard to any relevant national policy statement (NPS), amongst other matters, when deciding whether to grant a DCO. Where there is a relevant NPS in place DCO applications are determined in line with Section 104 of the Planning Act 2008.

4.2. The following NPSs are considered relevant to the determination of this DCO Application and set out the assessment principles for judging impacts of energy projects:

- EN-1 - National Planning Policy Statement for Energy
- EN-3 – National Planning Policy Statement for Renewable Energy Infrastructure
- EN 5 – National Planning Policy Statement for Electricity Networks Infrastructure

4.3. The Development Plan Framework for the impacted area of Nottinghamshire includes the:

- Bassetlaw Local Plan 2020-2038 (May 2024)
- Nottinghamshire and Nottingham Waste Local Plan (September 2025)
- Nottinghamshire Minerals Local Plan (March 2021)

4.4. The subsequent section on the assessment of impacts will refer to relevant national and local policies, as far as they relate to the matters which are covered within this LIR. Other relevant policies from the development plan framework will be referred to within the district council LIR.

5. Assessment of Impacts

This section of the report provides comments from specialist service areas on the technical assessments within the Environmental Statement (ES) submitted with the application and the likely impacts of the proposed development upon Nottinghamshire, focussing on the issues relevant to NCC.

5.1. Built Heritage

5.1.1. Local Policy:

Bassetlaw Local Plan 2020-2038 (May 2024)

- Policy ST40: The Historic Environment
- Policy 41: Designated and Non-Designated Heritage Assets

5.1.2. National Policy:

- Section 5.9 of EN-1 (Historic Environment) acknowledges that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground (5.9.1);
- Sections 5.9.9 to 5.9.15 lay out requirements for the ES assessment to provide a description of the significance of the heritage assets affected by the proposed development and the applicant should ensure that the extent of the impact of the proposed development on the

significance of any heritage assets affected can be adequately understood from the application and supporting documents;

- Sections 5.9.16 to 5.9.21 presents requirements for mitigation of development impacts on archaeology identified within the order limits.
- Additional guidance for Renewable Infrastructure and Cultural Heritage is presented at Sections 2.10.107 to 2.10.119 of EN-3 and expands slightly on guidance from EN-1.
- Section 2.10.112 and Footnote 94 of EN-3 require assessment to be include information on the Historic Environment Record (HER) and the results of pre-determination evaluation and that this in turn should inform design of the scheme.

General Issues

5.1.3. **Setting of Littleborough SAM:** The amended details show that the area around the Littleborough Roman Town Scheduled Ancient Monument (SAM) has now been removed from the project. This is very much welcomed as it would help to preserve most of the significance of the SAM. The detached area to the west of the proposal site, north of Caddow Wood, has also been removed. As illustrated on the contour map on my previous comments, that area was considerably higher (above sea level) than the surrounding landscape so development on that site was likely to have a considerable impact. Again, the removal of that site is welcomed.

5.1.4. **Setting of Crow Tree Farm listed building:** Land South of Station Road and west of Crow Tree Farm (Appendix 2) there is a public footpath which goes in a NW to SE direction, which affords views towards 3 prominent local landmarks in the village, all listed, namely the curtilage-listed former agricultural building range next to Crow Tree Farmhouse (now called Oak Barn, Crow Tree Barn and Millers Barn), West End Farm (including its curtilage-listed barns), and the Church of St Peter & St Paul. The open views along this footpath form a key part of the setting of those Listed Buildings, especially the church, and the addition of solar within that immediate area would fail to preserve their setting. It is therefore recommended that the area to the north of the dotted line shown on the attached plan be removed from the proposal, so as to better preserve the setting of those important Listed Buildings.

5.1.5. **Setting of grouping of listed buildings along Main Street North Leverton:** in the land adjacent Manor Grove (Appendix 3), North Leverton there is a public footpath that runs through this site. The open countryside contributes to the rural setting of the heritage assets along Main Street, and it is therefore recommended that this area be taken out of the proposal.

5.1.6. NCC also has concerns relating to the impact on the wider setting outside of the 3km boundary, which includes North Leverton Windmill.

5.1.7. Regarding the LVIA provided with the application we have the following observations:

- The viewpoints and photomontages, taken as a whole, do not provide for a very thorough appreciation of the visual impacts that will be experienced as a result of the solar panels and the proposed screen planting. There are some particularly significant

long views of open Trent Valley landscape that take in various listed buildings (in particular the churches and windmill), the proposed solar scheme will be quite visible in these views and it is hard to imagine how moving through this landscape the appreciation of the rural character of the area will not be negatively impacted. As a result the present distinctively rural, agrarian landscape setting of the Heritage Assets within the valley views will all be harmed.

- The cumulative impact assessment is lacking a ZTV that includes the Gate Burton solar scheme to the east.
- The cumulative impact assessment lacks a thorough examination of moving through and within the surrounding Trent Valley area and the photo montages do not address the potential for various parcels of solar, BESS and other industrial development to be intervisible within views that include designated Heritage Assets.

5.1.8. Regarding the Cultural Heritage chapter and assessment of impacts on setting:

- Burton Chateau grade II* listed building sits on elevated land close to the river Trent on the Lincolnshire (West Lindsey) side of the valley. The development will be visible within the design landscape views from this heritage asset (which was deliberately located within the design landscape of Gate Burton Hall). These views are included in those presented on the Landmark Trust's booking website for Burton Chateau and highlights the importance of the Trent Valley rural, agrarian landscape in promotion of the area to visitors. We disagree with the removal of this asset from thorough examination of impacts on its setting.
- North Leverton Windmill, grade II* listed building is a very significant local tourism and educational resource. The assessment of the impact on the setting of the windmill provided in the ES Cultural Heritage chapter is not a fair representation of the role of the Trent Valley landscape in the appreciation of the windmill as a heritage asset and it does not recognise the significant landmark status of the windmill in the wider landscape views, within which it is a distinctive and very well recognised element of the rural character of the area.
- Impacts on the setting of North Leverton Windmill are likely to be at the highest end of 'less than substantial harm' category with regards to the NPPF.
- The solar scheme has the clear potential to impact on financial viability and thereby on the 'optimum viable use' of both North Leverton Windmill as a visitor destination and to a lesser extent Burton Chateau as a holiday let, thereby causing direct harm to both of these grade II* designated heritage assets. Without the evidence to prove otherwise, we would consider this impact to fall into the 'substantial harm' category with regards to the NPPF.

5.2 Buried Heritage

Local Policy – Bassetlaw Local Plan

- Policy ST40: The Historic Environment
- Policy41: Designated and Non-Designated Heritage Assets

National Policy

5.2.1. National Policy Statement for Energy (EN-1) (2023), Section 5.9 Historic Environment

- Section 5.9 of the acknowledges that *the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground* (5.9.1);
- Sections 5.9.9 to 5.9.15 lays out requirements for the ES assessment to provide a description of the significance of the heritage assets affected by the proposed development and the applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents;
- Sections 5.9.16 to 5.9.21 presents requirements for mitigation of development impacts on archaeology identified within the order limits.

5.2.2. National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)

- Additional guidance for Renewable Infrastructure and Cultural Heritage is presented at Sections 2.10.107 to 2.10.119 and expand slightly on guidance from EN-1.
- Section 2.10.112 and Footnote 94 require assessment to be include information on the Historic Environment Record (HER) and the results of pre-determination evaluation and that this in turn should inform design of the scheme.

5.2.3. It is the Council's position that to properly assess the impact of a development upon archaeology, the applicant should provide sufficient desk-based research, non-intrusive survey and intrusive field evaluation to adequately understand the archaeological resource within the scheme and detail the proposed development impacts upon it. This is necessary to design an agreeable Archaeological Mitigation Strategy (AMS) to limit as far as possible the proposed development impacts. The Environmental Statement (ES) must present the full range of findings from this archaeological work and provide an evidential basis for at least an Outline AMS (OAMS) for consideration at Examination.

5.2.4. The scheme proposes significant solar development over a large area of north Nottinghamshire covering approximately 888 hectares and in known areas of high archaeological potential and sensitivity as recorded on the Nottinghamshire Historic Environment Records (NHER). Within the Order Limits, these include numerous known late Iron Age and Roman settlements, sited either side of a major Roman road (Margary 28a) that branched off from Ermine Street and provided an alternative route around the Humber, avoiding the unreliable ferry crossing. The road fords the River Trent at Littleborough at the eastern end of the site and bisects it along the full length to exit north-west of Sturton le

Steeple. Significant medieval settlement remains are also known within and around the Order Limits, one of which is protected under the Ancient Monuments and Archaeological Areas Act 1979. It is highly likely that numerous unknown Roman and potentially other period sites are present within the Order Limits.

- 5.2.5. The applicant has submitted an Environmental Statement in support of the application and considers archaeology at Chapter 9, Cultural Heritage ([APP-067](#)). Supporting appendices have also been submitted and comprise:
 - Cultural Heritage Technical Baseline ([APP-122](#))
 - Magnitude Surveys Geophysical Survey Report ([APP-123](#))
 - Archaeological Mitigation Statement ([APP-124](#))
 - Outline Written Scheme of Investigation for Pre-Determination Trial Trenching ([APP-125](#))
 - Outline Written Scheme of Investigation for Post-Consent Archaeological Works ([APP-126](#))
- 5.2.6. The applicant's submission relies primarily upon desk-based work and non-intrusive geophysical survey (solely magnetometry). While this has identified several areas of high archaeological potential, the full extent, state of preservation, depth, date and significance of the archaeology has not been established in any meaningful way and the approach to date is significantly flawed in this regard.
- 5.2.7. For solar development, we would expect by Examination for the areas of high archaeological potential and for areas of high ground impact to have been subject to trial trench evaluation. This is necessary to adequately record the extent, presence/absence, state of preservation, depth, date of the archaeological remains present and is the only means to properly establish **significance** which is key to EIA assessment. It is also key to designing an appropriate Archaeological Mitigation Strategy and Footnote 94 of EN-3 is very clear in asserting that: ***The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions.***
- 5.2.8. **The applicant has recently undertaken limited trial trench evaluation of the BESS and substation compounds comprising 16 trenches. While this is welcomed, the overwhelming majority of the site remains un-evaluated and in a state where the applicant does not understand the archaeological resource sufficiently to assess the proposed development impact.**
- 5.2.9. The pre-determination trenching is confined to the BESS and substation area and does not include other areas of infrastructure such as new roads/tracks, cable trenching for both for connecting rows of panel arrays and for grid connection, or for landscaping and ecological management areas. It also fails to include the areas of archaeological sensitivity that their own assessment work has identified.
- 5.2.10. The applicant's Archaeological Mitigation Strategy (AMS) presented at APP-124 is therefore based on insufficient data and is not a reliable document for basing a comprehensive mitigation strategy. The documentation suggests that solar schemes are flexible and that detailed assessment at the application stage is therefore unnecessary (Rochdale Envelope), however this is not supported by current guidance, particularly [NSIP Projects – Advice Note Nine](#)

(5.2): *'Implementation of the Rochdale Envelope assessment approach should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment. Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO application. Indeed, as explained earlier in this Advice Note, it will be in all parties' interests for the Applicant to provide as much information as possible to inform the Pre-application consultation process.'* And The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017: *'The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape.'* ([Regulation 5 \(2d\)](#))

- 5.2.11. The AMS presents 4 areas of high archaeological potential identified in the geophysical survey report. It proposes that these areas are removed from development. In principle we strongly support this approach, however the data these exclusion areas are based upon are necessarily limited due to a lack of trial trench evaluation. Experience from numerous sites in the County show that geophysics results usually only provide a partial view of the extent of archaeological remains and often fail to identify significant archaeology at all. The full extent of these areas would be established more accurately when combined with trial trenching results. The applicant's own report recognises the limitation of using geophysics as the sole prospection technique at section 7.1. While we support the use of exclusion for these areas, the full extent and nature of the archaeological remains have yet to be sufficiently determined.
- 5.2.12. Further, no provision has been made for intrusive evaluation of any other areas of high potential identified in the desk-based and non-intrusive work presented. The geophysics report records 8 areas of archaeological potential and only 4 have been addressed in the AMS. Further scrutiny of the report also shows that not all potential anomalies have been presented in the interpretation section. For instance, probable enclosures are shown in the greyscale plots in Figure 9 & 10 (western side of the map) but are not shown on the interpretation at Figure 11. Further, many of the greyscale plots show enhanced disturbance, possibly from green waste or changes in geology, across large parts of the site (see Figures 15 & 18) which will have likely obscured any archaeological remains present. In such instances, evaluation trenching is necessary to assess archaeological potential.
- 5.2.13. The Outline Written Scheme of Investigation for Post-Consent Archaeological Works presented at APP-126 is incredibly vague and of little value due to the lack of trial trench evaluation to date. We strongly refute the statements at Sections 2.4, 2.6 and 2.7 and cite again Advice Note Nine and guidance in EN-3 including Footnote 94 as well as the sections that the applicant has quoted which do indeed mention field evaluation. Field evaluation is 'necessary' in areas where no previous disturbance may have removed it (historic quarrying) to prospect as well as characterise archaeology. The applicant's interpretation of Policy is simply incorrect and highly irresponsible in relation to managing risk to the development.
- 5.2.14. In many sections of the post consent (OWSI) that applicant states that 'no confirmed evidence' for each period has been identified or makes assumptions upon dates for features without sufficient evidence to support it. This is entirely down to their flawed and insufficient approach. In general, you are unlikely to identify something if you don't look for it. This is not an acceptable approach to any assessment.

5.2.15. The approach presented in the post consent OWSI can be summarised as 'we'll determine the scope of work later'. This provides considerable risk to the applicant or their successors when implementing the consented scheme. However, NCC do agree with sections 5.4 relating to separate WSI's for each phase of work, section 5.5 relating to contingency trenching and section 5.7 relating to likely requirements for mitigation work. The work will also need an Archaeological Clerk of Works to have oversite of work on the ground and to liaise between the developer's delivery team, consultant, archaeological contractor and relevant stakeholders.

Proposed Impacts

5.2.16. Chapter 9 assesses impacts upon archaeology from section 9.7.3 onwards. This section is necessarily very general due to the lack of assessment information as discussed earlier. The area identified in the desk-based work (*Segelocum* Roman town) and the 4 areas identified in geophysical survey have been removed from development which is welcomed. An appropriate management strategy for these areas will need to be presented in detail, however the impact from development in these areas is considered **low**. Until further field evaluation has been carried out, and the archaeological resource has properly defined and understood, and an appropriate and detailed Archaeological Mitigation Strategy designed, the impact from intrusive ground development where it encounters archaeology will be **significant, adverse and negative**.

5.2.17. Section 9.7.12 asserts that there will be no direct impacts, however this fails to address concerns around mid-life refits and maintenance and should be considered further.

5.2.18. Section 9.7.23 considers decommissioning and makes assumptions on significance of archaeological remains that cannot be supported by the level of assessment work to date. As with the construction phase, until further field evaluation has been carried out, and the archaeological resource has properly defined and understood, and an appropriate and detailed Archaeological Mitigation Strategy designed, the impact from intrusive ground works associated with decommissioning where it encounters archaeology will be **significant, adverse and negative**.

Proposed Mitigation

5.2.19. Chapter 9 presents an outline strategy for mitigation and enhancement from Section 9.8 onwards. This is necessarily vague and general due to a lack of proper assessment except for the 4 areas identified in the geophysics and the *Segelocum* Scheduled Monument.

5.2.20. Section 9.8.2 provides for trial trenching both pre and post determination. None of this has been undertaken to date and we would expect all the sensitive areas identified and high impact areas to be completed for Examination. To reiterate, until this has been completed, the applicant cannot provide an accurate assessment of archaeological potential or significance.

5.2.21. Once a proper trenched evaluation has been undertaken, we would broadly support the measures suggested in Sections 9.8.3, 9.8.4 and 9.8.5, although the specific details for mitigation work will need to be agreed.

5.2.22. We broadly support the proposals for the operational phase (Sections 9.8.6 and 9.8.7) but would include further measures for areas where ground works are necessary for refit and maintenance and have not already been included in assessment or mitigation work prior to construction. **We would also seek to remove any Permitted Development rights in areas that have not been properly assessed or been subject to mitigation work or measures.**

5.2.23. We also welcome the approach to preservation areas during decommissioning (Section 9.8.9), but would also seek additional work in areas that have not already been included in assessment or mitigation work prior to construction.

Conclusions

5.2.24. The Council has profound concerns regarding the approach that the applicant has taken to archaeology on this site. It lies in an area of particular archaeological potential relating to Roman and later settlement, being bisected by a major Roman road. Numerous significant sites have been recorded around it, including extensive remains on the new quarry adjacent and to the north-east of order limits.

5.2.25. The evidence presented to date relies on limited data that has not been investigated adequately to provide any indication on the actual significance of the archaeology present. Currently the applicant can make no reliable statements on significance, extent, date, state of preservation or depth of any of the archaeology that they themselves have identified through non-intrusive work. This is a highly flawed approach and does not meet the basic requirements of planning policy or guidance, or indeed that of the professional standards expected.

5.2.26. The limited data presented indicates the presence of significant archaeology across the site, but does not yet provide sufficient site-specific detail on the nature of much of it and therefore cannot assess the development impacts upon it. Further, it does not yet offer an agreeable programme of mitigation work to offset those impacts, although the high-level strategies discussed may be appropriate once the archaeological resource is properly understood.

5.2.27. In our experience of sites of this size and potential impact, trenching results are necessary to test the reliability of the geophysics results and are also essential for effective project risk management if the DCO is granted. Failing to adequately evaluate a site of this nature could lead to unnecessary destruction of heritage assets, potential programme delays or delivery issues and excessive cost increases that could otherwise be avoided.

5.2.28. Where insufficient assessment has been undertaken and excluding the 5 areas already removed from development, the Council's position must be that the development will have a **significant, adverse and negative impact** on the archaeological resource when encountered within the Order Limits.

5.2.29. The wording of an appropriate archaeological DCO requirement will depend on the level of assessment work that has been completed by the close of Examination. We recommend that if some evaluation trenching is still outstanding, then wording similar to that for the recently approved Mallard Pass scheme would be appropriate. It is likely that the implementation of further post-consent assessment work and mitigation work will be complicated and we are

currently working with Solar Energy UK and the Chartered Institute for Archaeologists to formulate appropriate requirement wording in such instances.

5.2.30. This position will alter when the applicant completes an acceptable programme of pre-determination evaluation, presents an agreeable programme for post-consent evaluation and assessment work and is able to submit their detailed and properly informed AMS for Examination.

5.3 Biodiversity

5.3.1. The following comments are a summary of the concerns NCC have regarding the ecology impacts (including Biodiversity Net Gain) of the Proposed Development, having reviewed all documents submitted as part of the application for DCO EN010163 – Steeple Renewables Project Examination Library in relation to ecology and BNG. Further comment will be provided at a later stage of the assessment process.

Ecology

5.3.2. We have some concerns in relation to the proposed enhancements, namely the works which will be undertaken to complete the enhancements in the biodiversity mitigation areas as further species surveys have largely been omitted from the biodiversity areas, which may be impacted by these proposed enhancement works i.e. works to watercourses, other habitat creation works.

5.3.3. Clarification is required on the methodology used for the aquatic invertebrate surveys, as only one survey occasion was completed for each waterbody. This approach does not seem sufficient as one survey occasion for each waterbody is very limiting and any environmental conditions i.e. such as the drought this year may impact the results or provide an inaccurate overview of the species present.

5.3.4. The Environmental Statement (ES) chapter considered that both mink and water vole are present in low numbers at the site, yet no mitigation or enhancements specifically for these species has been provided, other than watercourse enhancements, which form part of the BNG works. We would like to see some enhancements proposed specifically for water vole, such as the commitment to the control of mink (an invasive non-native species) and possibly some of the waterbodies enhanced specifically for water vole.

5.3.5. The ES chapter states "*The design of the Proposed Development is such that no direct impacts on habitat that could be used by roosting or nesting barn owl will be affected. The need for further survey will be assessed once the construction detail and timing are known, and if the risk of disturbance of a barn owl becomes a possibility*". At this stage the construction detail and timing should be known and therefore the requirement for further surveys.

5.3.6. We require further clarification on badger setts as the impact assessment and mitigation and enhancement sections within the ES Chapter contradict each other. In addition, we would like to see proposed mitigation for this species i.e. buffer zones and gaps in fences with the current known badger setts/evidence of badger (e.g. mammal paths) mapped on a plan. Mammal gaps should also benefit other species observed at the site such as brown hare.

5.3.7. No impact assessment for this invasive species has been provided. We would like to see some mitigation as part of the enhancements for these species – e.g. the removal and control of Canadian waterweed. Over time this species could naturally spread into other watercourses across the site, and we would be keen to remove this issue before it becomes a wider ecological issue across the site and local area.

5.3.8. We have concerns about the proposals for the directional drilling proposed underneath the watercourses as no assessment for this appears to have been provided in the ES for the likely impacted species i.e. fish.

5.3.9. We also have concerns about impacts on skylarks. The ES chapter estimates that mitigation, as set out in the Skylark Mitigation Strategy, will mitigate approximately 55% (against the 2023 total of 105 territories) to 64% (against the 2024 total of 90 territories) of the territories to be displaced by the proposal solar infrastructure. This is assessed as an ***adverse residual effect significant at a Local level***, as well as an ***adverse cumulative effect significant at the Local to District level***. It is indicated that some further habitat creation will provide ‘secondary biodiversity benefits’ including providing nesting habitat for skylark, as listed in para 4.8 of the Skylark Mitigation Strategy, which will further increase the total number of post-development skylark territories, but this is not quantified. It would be useful to attempt to do this, whilst recognising the constraints in doing so. Nevertheless, it is apparent that a residual impact on this Red Listed (but still widespread) species would remain.

5.3.10. We require more information in relation to the Decommissioning proposals, whilst appreciating that not all impacts are known at this stage. We would like to understand the level of monitoring and surveying proposed to inform the impacts prior to decommissioning. In addition, we would want to see that no decommissioning works are undertaken within nesting bird season and this secured, as the mitigation for ground nesting skylark should increase the number of territories and nests across the site.

5.3.11. We would also like some indication about expectations for the Site once the decommissioning has been undertaken, such as whether it will put back into its original use and whether areas such as the grassland margins around the solar arrays and mitigation areas be lost.

5.3.12. In relation to the outline CEMP – there are a few sections in the ecology table which state “*These measures are described within the outline CEMP*”. These statements and the lack of details within this document need to be reviewed and updated, as currently the outline CEMP does not provide enough details. In addition there are the following issues which need rectifying/adding to the proposed mitigation:

- The proposed nesting bird surveys, should they be required in nesting bird season, must be undertaken by a suitably qualified and experienced ecologist.
- In relation to reptiles and amphibians, a directional two-phase cut (with 24 hours left between the two cuts) of the suitable vegetation should be undertaken rather than just progressive removal. This more precautionary approach should be undertaken as no reptile surveys were undertaken and therefore the distribution and populations of any reptiles at the site is currently unknown.
- Specific hand searches for reptiles, amphibians and hedgehogs should be undertaken immediately prior to any dense vegetation removal works, i.e. hedgerows, tussocky

- grassland, scrub etc where these species could utilise as refuge or hibernation/breeding sites. This must be undertaken by a suitably qualified and experienced ecologist.
- A buffer plan for the entire site should be made available for review. This would make the buffers easier to understand and implement for the contractor prior to the start of the construction works.
- A ‘dark corridor plan’ should also be produced, where no artificial lighting will be present (temporary or permanent) to protect light-sensitive (i.e. potential bat roosts, barn owl roosts, badger setts etc.).

5.3.13. In relation to the outline LEMP, there are details missing within this document, with sections stated to be provided in detail as part of the final LEMP. We will review and provide further comments on this document once all details are known, but currently we broadly agree with the outline creation and management prescriptions provided. In addition, we would like to see proposals for areas of tussocky grassland to benefit amphibians and reptiles but also provide more barn owl foraging habitat across the Site.

5.3.14. Further, having reviewed the Figure 6.9 Landscape and Ecological Mitigation Strategy plans, it is noted that some changes have been made to the Eastern Mitigation Area to reflect discussions held in March 2025, particularly in relation to the floodplain grazing marsh area to the north of Littleborough Lagoon. However, a number of further suggestions have not been adopted, and an explanation for this is required. In particular, it was requested that:

- The two scrub blocks should be removed from the ‘inverted V’ grassland areas in the centre of the Eastern Mitigation Area, to maximise the likelihood of ground nesting birds, including species such as Lapwing, using this area. The scrub can be relocated to peripheral areas.
- Consideration be given to consolidating grassland areas in the Eastern Mitigation Area into one larger block on the eastern side of this area to give ecological benefits as well as potentially simplifying management.

Biodiversity Net Gain

5.3.15. Biodiversity Net Gain (BNG) as it is not a mandatory requirement for NSIPs, and a BNG metric spreadsheet was not available for review at the time of the most recent submission; therefore, more detailed comments will be provided at a later stage.

5.3.16. The BNG proposals and approach to the assessment is well considered and detailed with relevant justifications provided where necessary. Overall, there is proposed to be a net gain for all habitat types, which is to be expected for a solar scheme. There are a couple of clarifications which we would like provided in relation to APP-114 6.3.7 Appendix 7.12 Biodiversity Net Gain, Chapter 5:

- *Individual trees are not recorded separately within the baseline value as they will be retained, except for potentially irreplaceable (veteran) trees, which have been precautionarily listed within the SBM (see irreplaceable habitats subsection in section 4).* Does this mean that any individual trees other than the “irreplaceable” trees have not been included, or that any trees within hedgerows have not been included?
- Hedgerow assessment – we agree with the desk-based approach in principle, but would like clarification if the hedgerows which are to be impacted (i.e. areas removed for access)

were also subject to condition assessments? Section 5 reads as if only the hedgerows with five or more species were surveyed, which might not include those to be directly impacted.

- In addition to the above clarifications, we would like more details in relation to the proposed watercourse enhancements as currently it's not clear what enhancements are proposed at which watercourses and whether they will further impact protected species.

5.4 Landscape and Visual

5.4.1. Local Policy:

- Bassetlaw Local Plan
 - Policy ST35: Landscape Character

5.4.2. National Policy

- EN-1 confirms that all energy infrastructure projects will have adverse effects on landscape and that projects need to be designed carefully, taking account of the potential impact on the landscape and the aim should be to minimise harm to the landscape, providing mitigation where appropriate. The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects, with reference to any local character assessments.
- Further guidance in relation to solar farms is provided in EN-3 which places emphasis on effective screening, including through native hedges, trees and woodlands.

5.4.3. AAH Consultants (AAH) has been commissioned to prepare a review of the Landscape and Visual (L&V) elements of the application documents on behalf of NCC and BDC. The review is presented as a report and is set out in Appendix 4. It provides comments on the presentation of the L&V Chapter of the ES, the methodology and scope of assessment, the appraisal of landscape and visual baseline and effects and the mitigation and design of the project.

5.4.4. This section of the LIR provides an overall summary and conclusion on the suitability of the Landscape and Visual elements of the DCO Application and whether they are sufficient to support an informed decision. This includes the adequacy of the LVIA, reviewed in accordance with the Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAAs) and Landscape and Visual Appraisals (LVAs). It also includes recommendations for further information that should be provided to assist in the examination of the DCO Application. However, it is recommended that the full report appended to the LIR is read to understand the wider context and reasoning for the conclusions.

5.4.5. The LVIA and the associated figures, appendices and documents provide a thorough analysis of the Development and is appropriate to the scale and context of the Site. The process of assessment is thorough and well explained in the volumes, which include a clear summary of findings and identification of significant effects on the landscape and visual baseline. There are some parts of the assessment that we have highlighted issues with, which are summarised below.

Summary and Conclusions on the LVIA

5.4.6. By virtue of its scale and massing, we judge that the Development would result in Significant adverse effects on landscape features, local landscape character and visual amenity during all key phases (construction, early operation, and at year 15). The proposals would fundamentally alter the character of the Site and its immediate surroundings, replacing open, agricultural fields with extensive solar infrastructure. This represents a substantial and long-term change to the openness, tranquillity, and rural character of the area.

5.4.7. The LVIA and supporting documentation are generally proportionate to the scale of the Development and demonstrate compliance with GLVIA3 and relevant Landscape Institute guidance. The assessment is clearly structured, with separate consideration of landscape and visual receptors, and has been prepared by a competent practitioner. However, a number of methodological, baseline and interpretative issues limit the robustness of the conclusions reached.

5.4.8. While the methodology broadly reflects GLVIA3, there are inconsistencies in how Significance is defined when compared with the wider ES methodology. Professional judgement is relied upon throughout, but justification for value and susceptibility, and ultimately sensitivity, and magnitude judgements is limited for both landscape and visual receptors. Greater transparency is also required in explaining how thresholds of Significance have been applied, and in clarifying whether the LVIA has assessed a genuine worst-case scenario under the Rochdale Envelope approach.

5.4.9. The landscape baseline description is relatively cursory, with limited analysis of key landscape features and perceptual qualities. The omission of explicit assessment of land use change, from open arable farmland to large-scale solar infrastructure, represents a significant gap, given that we judge this is the most fundamental alteration to landscape character. While beneficial effects are claimed for new planting at Year 1 and Year 15, we seek additional information on these points, as these are likely more accurately described as mitigation, rather than true enhancement. We judge that the scheme would result in Significant adverse landscape effects at construction, operation and decommissioning, with long-term changes to local landscape character that should be considered effectively permanent.

5.4.10. The visual assessment identifies a range of receptors, but again transparency on the value and susceptibility of these receptors is lacking. Significant adverse visual effects are identified at construction and early operation, particularly for PROW users and those on the local road network. However, we disagree with the LVIA's conclusion that all significant effects dissipate by Year 15, as the mitigation planting itself alters the baseline character of views, often foreshortening open vistas and potentially introducing new, landscape elements that may appear out of character in this landscape. We also consider that several residential properties within 500m will experience adverse effects that would likely be judged as Significant, whereas the LVIA does not identify any Significant visual effects to residents in properties.

5.4.11. Whilst the LVIA concludes no significant cumulative effects, we consider the scale of renewable and grid-related projects in Nottinghamshire and Lincolnshire presents a substantial risk of cumulative and sequential change at regional levels. Large-scale solar and energy

infrastructure are likely to become defining characteristics of the regional landscape, altering openness, tranquillity, and perceived rural character. Sequential effects for PROW and road users are of particular concern, with repeated experiences of large-scale solar resulting in a diminished capacity to tolerate change.

5.4.12. The iterative design process is referenced, but buffers, or offsets, to sensitive visual receptors appear limited. Mitigation planting is relied upon heavily to reduce adverse effects, but this in itself has the potential to be out of character in this open arable landscape. The Outline Landscape and Environmental Management Plan (OLEMP) provides a framework for future detailed designs and management of the scheme, but long-term commitments (well beyond 5 years) to establishment, monitoring and replacement planting must be secured. Without this, the predicted Year 15 reductions in effects cannot be relied upon.

5.5 Minerals and Waste Management

5.5.1. Local Policy:

- Nottinghamshire and Nottingham Waste Local Plan (2025)
 - SP1 – Waste Prevention and Re-use
 - SP8 – Safeguarding Waste Management Sites

5.5.2. National PolicyEN-1 states that proposals should ensure that sustainable waste management is implemented through the waste hierarchy and that disposal of waste should only be considered where other waste management options are not available. The applicant should set out the arrangements that are proposed for managing any waste produced and should include information on how re-use and recycling will be maximised in addition to proposed waste recovery and disposal.

5.5.3. It is recognised that the applicant has addressed the comments made by the County Council previously in terms of recognising that the Nottinghamshire Minerals Local Plan (adopted March 2021) forms part of the suite of development plans for the Local Area. However, there is still no reference to the Nottinghamshire and Nottingham Waste Core Strategy and emerging Nottinghamshire and Nottingham Waste Local Plan within the Planning Statement, despite the applicant indicating it has been included within their response to point five in the Consultation Report: Appendix Part H. Neither Plan, or its relevant policies, are referenced within paragraph 6.14 as suggested nor within Appendix C (labelled as Appendix D within the Planning Statement) titled Local Policy Accordance Table. As detailed in our previous response in January, the County Council consider that the application is in accordance with Policy SP1, as it seeks to manage waste high up the waste hierarchy as possible, and Policy SP8 as there are no safeguarding concerns. It would be appreciated if this could be added within the Planning Statement to demonstrate the applicant has considered them.

5.5.4. The County Council previously highlighted that the Eastern area of the proposed site lies within the Mineral Safeguarding and Consultation Area for sand and gravel, with the allocated and permitted quarry of Sturton le Steeple also nearby. To ensure the safeguarding of the quarry and mineral resource, the County Council asked the applicant to prepare a Minerals Resource Assessment, something which other similar DCO applications have provided. The applicant however has not submitted a Minerals Resource Assessment but included a section in their

Planning Statement under section 6.11 for mineral safeguarding. The County Council consider that this is not sufficient due to reasons set out below.

- 5.5.5. Firstly, paragraphs 6.11.2 to 6.11.10 in the Planning Statement do not mention the permitted and allocated Sturton Le Steeple quarry nor discuss how the application has considered and assessed potential impacts on the quarry in terms of its operation and restoration. Sturton Le Steeple is allocated under [Policy MP2c of the Nottinghamshire Minerals Local Plan](#) and is one of several sites that ensure a steady and adequate supply of sand and gravel in Nottinghamshire to meet expected demand over the Plan period (2036). The quarry has planning permission for extraction (1/22/00047/CDM) until December 2035, with operator Holcim looking to commence extraction in 2026. Considering the resource in the area and the delay in extraction commencing, it is likely that the quarry life will extend beyond 2035 and so will be present at the start of the DCO applications life, if permitted. The County Council believe that the applicant should assess the potential effects of the proposal on the quarry and provide assurance that it will not impact the quarry's operation nor its agreed restoration. This is of particular importance as the applicant proposes to use the quarry's access road, which is due to be removed when the quarry is restored. Whilst the applicant notes that they will work with the quarry operator to avoid any potential conflicts in relation to the access road, further evidence and so reassurance should be provided through a minerals resource assessment.
- 5.5.6. Secondly, the applicant has indicated in section 6.11 of the Planning Statement that the mineral resource (across the wider project area) will not be sterilised due to limited ground disturbance and that it is of a temporary nature meaning that the resource will be available following the decommissioning of the site. The County Council recognise that the nature of development would not physically sterilise the resource but, as detailed in our previous response, the mineral present could be sterilised from an economical and practical sense. If Sturton quarry was to close and be restored, following extraction of its currently permitted mineral reserves, prior to the decommissioning of the DCO proposal, then the access road and processing plant will have been removed from the quarry site, which are considerable financial investments. Once removed it is therefore unlikely that future proposals and extensions for mineral extraction in the locality would be brought forward following decommissioning of the solar farm due to the cost of re-establishing such infrastructure. It is also questionable whether the proposed biodiversity mitigation area, which falls in the mineral safeguarding area, would be fully removed at the decommissioning stage as it would be well established after the expected 40-year lifespan. If this was retained, again this would make future extraction of the resource unlikely due to potential biodiversity loss. Therefore, the applicant should have considered the potential for sterilisation of minerals from an economical viewpoint as well as the actual physical sterilisation of the mineral.
- 5.5.7. The County Council believe that the applicant should have prepared a minerals resource assessment for the application, with this the standard practice for similar DCO applications in the area which have been, partly or fully, in a mineral safeguarding area. The mineral resource assessment should assess the effects the application may have on the resource and the quarry site, considering the points raised above. This would ensure any potential effects on minerals have been fully considered and mitigated where necessary.

5.5.8. It is therefore concluded that the impact of the proposal on minerals resource is **uncertain** at this stage, pending completion of the recommended assessment work, but it has the potential to have a negative impact on minerals safeguarding if appropriate measures are not taken to address impacts on the mineral resource and Sturton Le Steeple quarry.

5.5.9. As per the applicant's response in [point 5 of the Consultation Report: Appendix Part H](#) to the County Council comments, the applicant has assessed the impacts on waste within [Chapter 17 of the Environmental Statement under Miscellaneous Issues](#). The [Outline Construction and Environmental Management Plan](#) (ES Volume 2, Appendix 4.1) and the [Outline Decommissioning Plan](#) (ES Volume 2, Appendix 4.2) then provide further information on how waste will be managed.

5.5.10. These documents detail that the applicant will seek to minimise waste, maximise re-use and recycling opportunities and so follow the waste hierarchy, which the Council supports. At the decommissioning phase, it is therefore assumed that 60 – 89% of all anticipated waste streams will be recycled or recovered, with a new industry to recycle or refurbish to PV modules expected to emerge in the future. The assessment therefore concludes that the impacts are not significant.

5.5.11. However, as previously raised by the Council, whilst the scenario that the waste is recycled or recovered is preferable, the recycling capacity facilities to do this for the PV panels is not established, particularly at the scale that will be needed when considering the cumulative impacts of several solar farm schemes in this area expected to finish around a similar time. This issue is recognised in the recently published [Solar Roadmap: United Kingdom Powered by Solar](#) (June 2025) by the Department for Energy Security & Net Zero. Without the development and establishment of sufficient solar panel recycling facilities, this would lead to a large volume of waste in the area at the time that requires disposal. Other similar schemes, for example One Earth, have within their assessment of waste considered an absolute worst-case scenario whereby the waste is not able to be recovered or recycled. They have also considered the local and regional existing landfill capacity to understand potential significance impacts. Whilst the Outline Decommissioning Plan notes that forecasting future landfill capacity is difficult and that disposal of waste to landfill is the worst- case scenario, which the Council agrees with, there is though no detailed assessment of the significance of impact in this worst-case scenario, in relation to application and for cumulative effects, nor the recognition of the growing national issue around the limited landfill capacity. In Nottinghamshire particularly there is a lack of non-hazardous landfill capacity as identified in [Table 11](#) of the new Nottinghamshire and Nottingham Waste Local Plan. As raised in [paragraph 5.58](#) and [paragraphs 7.38 – 7.41](#) of the emerging Plan, due to underlying geology of the area and wider environmental constraints, the scope to provide hazardous and non-hazardous capacity in Nottinghamshire is extremely unlikely. This therefore stresses the importance of considering the absolute worst- case scenario.

5.5.12. The County Council therefore considers that the assessment of the impact on waste is not sufficient, with it not as detailed as others undertaken by similar schemes. It is considered that the assessment should have considered local and regional landfill capacity and assessed an absolute worst-case scenario. This again helps to stress the importance of developing recycling facilities and so capacity to enable the recovery and recycling of solar panels, for this project

and others within the area, to prevent significant cumulative impacts on declining landfill capacity.

5.5.13. It is therefore concluded that the impact on waste management is **uncertain** at this stage, pending completion of the recommended assessment work, but that the project has the potential to have a negative impact upon future landfill capacity if capacity to enable the recovery and recycling of solar panels is not developed.

5.6 Traffic and Transport

Transport Assessment

5.6.1. The Highway Authority (HA) has been working closely with the applicant's specialist transport consultant for several months and has helped to steer and develop the proposed strategy and approach to delivering the project.

5.6.2. The Transport Assessment (TA) aligns with NPPF principles by providing a detailed evidence base, considering strategic and local highway authority input and proposing mitigation through the Outline Construction Traffic Management Plan (OCTMP).

5.6.3. However, in certain aspects the TA does not align with our expectations of what a TA should include to understand the impact of the scheme. Firstly, The TA references pre-application discussions with authorities but lacks detail on broader community consultation, especially regarding traffic impacts on villages like Sturton-le-Steeple and North Leverton. Secondly the TA assumes worst-case traffic scenarios but does not clearly demonstrate how mitigation measures (e.g., minibus use, staggered shifts) will be enforced or monitored, which may affect deliverability. Thirdly while the routing proposed avoids sensitive areas, the report does not fully address cumulative impacts from other committed developments in the area, which gives rise to concerns.

5.6.4. In addition, the TA focuses on vehicle routing and mitigation but does not explore opportunities for walking, cycling, or public transport use by the workforce or during operation. The site is rural and inherently vehicle-dependent. While routing is optimised, the TA does not demonstrate how travel demand is reduced beyond basic scheduling.

5.6.5. Although the TA concludes that impacts are temporary and manageable, it relies heavily on assumptions (e.g., off-peak scheduling, minibus use) without robust enforcement mechanisms.

5.6.6. The TA and the associated Addendum requires further work before the HA is satisfied. The defined route from the A1 to the site using the strategic road network and main road network links is agreed in principle by NCC. The County Council has identified specific queries concerning the proposed 20 Nr field accesses/cross-over points/new entrances for the overland haulage routes that affect the adopted public highway. These are detailed in Appendix 5 and the applicant is asked to address the comments marked in red.

5.6.7. One significant area that is far from agreed is how the applicant have carried out the construction related traffic analysis and presented the data to demonstrate overall impact along the designated HGV delivery route and key junctions. The HA is liaising with applicant to inform them of what needs to be done to provide more clarity on this issue.

Outline Construction Traffic Management Plan

5.6.8. The County Council as HA has assessed (OCTMP) the is broadly happy with the conclusions for this project and my full comments are attached for the record. Pegasus have submitted a further addendum to the OCTMP to the County Council. The document looks a reasonable framework to help reduce construction-related transport disruption and safeguard public safety, but we not in a position to agree a statement of common ground (SoCG), as further clarity and transparency is required about some points.

5.6.9. In summary, for the OCTMP there are a few minor issues in respect of how the works programme will integrate with the normal Highways Permits and Licensing system to carry out works in the public highway. The document is also quite light about provisions for the HA to request reviews to arrangements when problems are encountered or how liaison about programme and street works will be organised with VIA EM Ltd – NCC's Highway Service Partner, but may have a significant impact is there is no explicit commitment for the main contractor to carry out remedial work if construction transport related damage occurs during the 2 year contract.

5.8. In terms of how the works programme for constructing this project will integrate with the highway permit system, the County Council has previously agreed wording for inclusion in another Solar DCO which meant that street works would be subject to NCC's Permit Scheme. This appears to have been omitted from the DCO for this project and the County Council is seeking this in terms of general comments on the DCO.

5.9. The County Council understands that the DCO will grant powers which negate the need for S278 agreement related to altering the highway layout and construct accesses. However, this should not circumnavigate the LHA's technical approval process. The County Council has raised this in terms of other solar NSIP projects and the applicant confirmed that the technical approval process should be described within the OCTMP and, in complying with the CTMP, they would need to secure a technical approval and also cover our costs.

5.10. The County Council wishes to confirm that this is covered in the OCTMP for Steeples. Likewise, with TTROs, whilst the DCO grants power to the developer to impose these (subject to our approval), the procedure for notification etc. should also be agreed/described within the OCTMP, further detailed comments on the OCTMP is contained within Appendix 6.

5.7 Public Rights of Way

5.7.1. The Definitive Map for the site plan of Steeple Renewables Project highlights that there are at least 35 Public Rights of Way (PRoW) that cross the areas identified on the interactive map

site. There are additional RoW adjacent to development areas that are also likely to be impacted.

- 5.7.2. The correct legal alignment of the public right of way can be checked by carrying out an official search, contact row.landsearches@nottscc.gov.uk. Inaccuracies or misalignments of the routes on a legal diversion may result in two paths being legally recorded, generating further inaccuracies and problems. Public Rights of Way (PROW) are the minor highway element of the public highway network and are afforded the same level of protection and control as the major highway network (i.e. all classes of roads including motorways). They are a material condition in the planning process and due attention should be made to the treatment of them in the application for development.
- 5.7.3. They form part of the sustainable transport network that has links to healthy living, reducing carbon footprints, safe non-motorised links to local facilities, so it is important ensure that they are linked to the other networks and are of a good design that encourages safe use.
- 5.7.4. Paragraph 105 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should protect and enhance PROW including taking opportunities to provide better facilities for users. Paragraph 117 states applications should prioritise pedestrian and cycle movements and create places that are safe, secure and attractive, minimising the scope for conflicts between users and vehicles.
- 5.7.5. There are also links with the Nottinghamshire Joint Health and Wellbeing Strategy 2022-2026 to reduce obesity through exercise and ensure opportunities are available in the local area and for general living; and Nottinghamshire Sustainable Community Strategy 2010-2020 which is developed in conjunction with all districts to provide opportunities for safe walking and cycling links and to reduce vehicle use.
- 5.7.6. Partnership working with NCC under Local Transport Plan 2011 – 2026 to promote safe non-motorised routes, connectively and economic growth. Encouraging developers to engage fully in utilising the available PRoW network by upgrading facilities in conjunction with good design principles will help to deliver on these policies.
- 5.7.7. It is rare that the impact on the PRoW network would provide a reason to refuse planning permission, however development can have a major impact on the quality of the route. A change in type of user or frequency as a result of the development needs to be accepted by the developer and consideration of the location, amenity and construction of the path as a result. This can all be accommodated appropriately using good design principle from the start to enhance the public willingness to use and make use of the PRoW network to achieve the policy aims of sustainable and safe transport corridors linking to the wider network, health and wellness of the local population, provision of good amenity and enjoyment.
- 5.7.8. The Preliminary Environmental Information Report (PEIR) does acknowledge that there are several PRoW across the site but perhaps does not fully appreciate the breadth of the network in that area. Overall the developer shows good consideration and appreciation of how the development will affect PRoW in the area.

5.7.9. The developer should work with the Rights of Way team on the next stages of design to ensure the following measures and conditions are met:

- Correct route of public rights of way: Note that it is the responsibility of the developer to ensure that their application takes account of the legally recorded route and width of any public rights of way as recorded in the definitive map and statement. This may differ from the line walked on the ground and may mean there are more than one route with public access. The legal width of public rights of way may be much wider than the habitually walked or ridden width. The correct legal alignment of the public right of way can be checked by carrying out an official search, contact row.landsearches@nottsc.gov.uk
- Protection from breaks in public rights of way and vehicle crossings/use of public rights of way: Many public rights of way are valuable as access corridors and as continuous wildlife and landscape corridors. As a matter of principle, PRoW should remain unbroken and continuous to maintain this amenity and natural value. Crossing PRoW with roads or sharing PRoW with traffic significantly affects wildlife movements and the function of the PRoW as a traffic free and landscape corridor. Road crossings of PRoW should be considered only as an exception and in all cases, provision must be made for wildlife access and landscape, and with safe high quality crossing facilities for walkers, cyclists and equestrians according to the legal status of the PRoW. Vehicle access should not be taken along PRoW without appropriate assessment and speed, noise, dust and proximity controls agreed in advance with Nottingham County Council (NCC).
- Protection, Mitigation and Improvements of routes: Public rights of way through the site need to be integrated with the development and provided to a standard to meet the pressures caused by the development. Assessments of current condition need to be undertaken along with proposals for onsite mitigation and improvement measures. This may include upgrades to some footpaths to enable cycling or horse riding and better access for commuters or people with lower agility. If new links across the network are created developer must understand the difference between dedicated and permissive routes. All of the above measures need to be agreed in advance with. All necessary PRoW mitigation and improvement measures onsite need to be undertaken prior to occupation to ensure public amenity is maintained.
- Protection of public rights of way and users: Routes must remain useable at all times during a development's construction lifecycle. This means temporary or permanent surfacing, fencing, structures, standoffs and signing need to be agreed with NCC Countryside Access and provided prior to the commencement of any construction and continue throughout. Access provision for walkers, cyclists and horseriders as vulnerable road users needs to be maintained. This means ensuring noise, dust, vehicle etc impacts are prevented. A detailed plan on keeping the public safe during construction will be required.
- Temporary obstructions and damage: No materials, plant, vehicles, temporary structures or excavations of any kind should be deposited / undertaken on or adjacent to the PRoW that obstructs the PRoW whilst development takes place. Avoidable damage to PRoW must be prevented. Where this takes place repairs to original or better standard should be completed within 24hrs unless a longer repair period is authorised by NCC.

- Route alterations: The development should be designed and implemented to fit in with the existing public rights of way network. No changes to the public right of way's legally recorded direction or width must be made without first securing appropriate temporary or permanent diversion through separate legal process. Note that there are legal mechanisms to change PRoW when it is essential to enable a development to take place. But these mechanisms have their own process and timescales and should be initiated as early as possible – usually through the local planning authority. Any proposals for temporary closure/diversion need to have an accessible, level, safe and reasonably direct diversion route provided with necessary safety fencing and stand-off to ensure public amenity is maintained for the duration of the disturbance. Within the PEIR it states that a PROW Management Plan will be provided as well as liaising with NCC Rights of Way.
- Gates / right of way: Any gates provided in association with the development shall be set back from the public right of way or shall not open outwards from the site across the public right of way.
- Bridges / drainage: Any bridges that are on site should be assessed prior to development. Any changes/improvements should be discussed with NCC, and where appropriate the EA and IDB. Flood levels should have been assessed and local drainage issues considered. Development should not further worsen drainage issues but should seek to improve them.
- Structures/ Furniture (Gates etc): Any new structure on existing RoW will require authorisation of the highway authority and can only be made under certain criteria. If a structure is required for the control of stock, then only a gate will be approved.
- Hedges/screening: Existing boundaries and hedgerows are the responsibility of the landowner to ensure they do not obstruct a PRoW. Where additional hedges/natural vegetation is proposed e.g. to shield the public from glint or glare, to coincide with new boundaries or to enhance existing boundaries, a lifetime management regime needs to be agreed with Nottinghamshire County Council as local Highway Authority to ensure that public access is not impeded when the vegetation screen is established or during the development or hedge/screen's lifecycle.
- Biodiversity Net Gain: Care should be taken not to include the surface of a PRoW in BNG calculations. Any planting should take place at suitable distances from PRoW. Making sure that they do not enclose or encroach the PRoW. With particular attention to the change in surface and canopy cover as vegetation matures e.g. not planting on the very edge of the PRoW. A management regime should be agreed with NCC.
- Enclosure: The PEIR documents have acknowledged that there will be a visual impact on sections of PRoW. If the line of the right of way is to be enclosed by hedging or fencing, for example to provide security for solar PV arrays, then there should be a 'corridor' (minimum width to be discussed) provided or the recorded width, whichever is the greater. Fencing should not have barbs, razor wire or palisade fencing within the line of the right of way and visual amenity should be maintained. The enclosed path and the hedge/fencing needs to be maintained to provide the full corridor width for the duration of the development.

- Surface: Surfaces of PRoW must not be disturbed or changed without prior discussion with NCC. For example: a previously grass surfaced path must not have hardstanding laid across without consent.
- Noise and vibration: Consideration should be given the impact of construction, demolition, traffic and BESS facilities on different user groups. Paying special attention to PRoW used by horse riders and the potential of spooking horses. The existing PEIR does acknowledge that it will detail a more thorough survey of the impact on users at a later stage, it is encouraged that special attention is given to where the bridleways and restricted byways pass through the site.
- Offsite mitigation: A contribution may be requested to secure off-site improvements to mitigate the loss of visual amenity and to provide alternatives or extensions of routes in the locality. This could include use of the space between the panels and the field edges (shade zone) which could provide a good opportunity for additional access.
- Information: The developer could consider the installation of a solar powered information board where the right of way enters the site. This will provide information on the wildlife on the site as well as providing information on the power output and how many houses it is supplying at any one time.

5.8 Local Flood Risk

5.8.1. Nottinghamshire County Council (NCC) commissioned AECOM to review the applicant's flood risk assessment and drainage strategy for the Steeple Renewables project (NSIP EN010163). The review evaluates the flood risk assessment (FRA) and surface water drainage strategy, examining their methodologies and consistency with relevant policies and guidance such as the NPPF/PPG, Defra's Non-statutory SuDS Standards, CIRIA C753, and Nottinghamshire County Council's (NCC) Local Flood Risk Management Strategy (LFRMS) Part 5.2. It also assesses the potential impact on local flood risk, considering surface water, ordinary watercourses, and groundwater.

5.8.2. The scope of this review therefore covers the following documentation:

- APP-011 – Site Layout
- APP-066 – ES Chapter 8 (Hydrology, Hydrogeology, Flood Risk and Drainage) – relevant to surface water drainage and flood risk
 - APP-117 to APP-119 – Flood Risk Assessment
 - APP-120 – Surface Water Drainage Strategy
 - APP-161 to APP-163 – ES Chapter 8 Figures
 - APP-178 – Flood Risk Assessment

Flood Risk Assessment

5.8.3. The document states that consultation was undertaken with several bodies, including the LLFA and TVIDB, with meeting minutes referenced. However, these minutes are not included as claimed, and no further details are provided. It is also noted that in the eastern half of the site, including east of the Catchwater Drain, the ordinary watercourses fall under the management of the Trent Valley IDB. The EA requested that sensitive equipment be raised 300mm above the 'design' 1 in 100 year plus climate change flood level, this has not been confirmed in the flood risk assessment or drainage strategy. No details of proposed watercourse crossings have been provided, including confirmation of the applicable design flood event for their assessment.

5.8.4. **The FRA should include the referenced meeting minutes with the LLFA and TVIDB, as stated in the document. This will provide a complete audit trail of stakeholder engagement and ensure transparency. The applicant should demonstrate that sensitive equipment is sited at least 300mm above the designed flood levels. The applicant should provide details of proposed water course crossings.**

Constraints

5.8.5. The assessment of constraints appears reasonable and covers the key issues expected at this stage. The site is located on the River Trent floodplain and is intersected by several drains and ditches, with land falling from higher ground in the west towards the river in the east. Parts of the eastern area sit within flood zone 3, protected by a flood defence bund. The underlying ground is mainly clay and mudstone, which have poor drainage potential, although limited infiltration may be possible in localised sand and gravel deposits. A part of the site also lies within a drinking water protected area, meaning that surface water and pollution risks will need careful management.

5.8.6. Infiltration testing should be undertaken in accordance with BRE 365.

Existing Drainage

5.8.7. The document provides only a general overview of site drainage and lacks detailed information on existing infrastructure in exception of sewer records. No evidence is given of surveys to identify culverts, outfalls, or other drainage assets, leaving the extent and condition of such features unclear. Inclusion of a plan drawing clearly marking existing drainage features such as ditches, culverts, and crossing points would offer clarity but is not deemed essential. Given the rural setting, it is unlikely that existing infrastructure would prevent the drainage strategy from being implemented as proposed.

Flood Risk Assessment

5.8.8. The flood risk assessment considers all relevant sources of flooding, each of which is addressed and discussed in the flood risk section of the report. Section 5.2.2 mentions the eastern 40% of the site falls within Flood zone 3 whereas in section 5.2.6 this is noted as 30%. Clarity is needed on which number is accurate, although it has been stated that all development is outside flood zone 3b. Flood defences at the site are mentioned but there is no information on their form and condition. The EA has requested a clear demonstration of how the site drainage and flood risk management measures can adapt to a 62% climate change allowance. At present, no such assessment has been provided, meaning it is not possible to confirm whether the proposed design will remain resilient under future climate change scenarios. The flood risk assessment does not consider the potential adverse impacts to the BESS in the event

of a flood defence breach. It is unclear whether flooding could cause irreparable damage to the BESS units or lead to secondary hazards such as chemical leakage, fire, or debris being washed away. There is also no assessment of the potential risks created for the wider public should equipment or hazardous materials be displaced during a breach scenario.

5.8.9. **It is recommended that the applicant undertakes hydraulic modelling at the requested 62% climate change allowance to show the impacts to the site. It is recommended that a breach analysis is undertaken to assess the vulnerability of the BESS to floodwater, including structural stability, potential for washout, and risks associated with potentially hazardous materials throughout construction, operation and decommissioning.**

Surface Water Drainage Strategy

Stakeholder Engagement

5.8.10. Appendix E does not include minutes of direct consultation with the IDB, meaning there is no visibility of what has been agreed with them. **This should be corrected.**

Drainage Design Strategy

5.8.11. The overall drainage approach for the solar panels is sensible and in line with standard practice, with runoff allowed to soak into the ground and extra measures such as swales and trenches provided where needed. The strategies for the BESS and the substation also seem generally appropriate, with storage designed for heavy rainfall and, in the case of the BESS, additional measures to contain firewater if an incident occurs. However, there are notable gaps in the submission, and the drainage strategy lacks sufficient detail and appears underdeveloped. The design only considers events up to the 1 in 100 year storm with 25% climate change, but it does not explain what would happen in the event of a larger storm. There is no mention of exceedance flows, how water would safely flow across the site if the drainage system was overwhelmed. Guidance from the LLFA and IDB usually expects clear plans for this, to make sure floodwater is routed away from sensitive equipment or areas and does not cause new risks off site. The strategy also does not explain what would happen if a flow control device became blocked, which is a realistic risk in practice. Some explanation of mitigation measures (for example, emergency spillways, bypasses or inspection regimes) would be expected. The FRA also mentioned that sometimes the ditches and watercourses can be surcharged which has not been accounted for in the model.

5.8.12. The strategy includes firewater storage for the BESS but not for the substation. It does not explain why this has been excluded. A clear justification would normally be expected.

5.8.13. The strategy assumes solar arrays will not increase runoff, mainly because of vegetation and permeable ground. Extra measures like trenches and swales are proposed on steeper areas. While this is consistent with industry practice, the report provides no quantitative evidence.

5.8.14. In the flood risk assessment, it is noted that the Environment Agency requested a minimum of 300 mm freeboard between the solar panels and the 1 in 100 year + cc fluvial flood level. However, this requirement has not been clarified in either the flood risk or drainage reports,

and no details are provided of the proposed heights of the solar panels above ground. This leaves uncertainty as to whether this has been addressed.

- 5.8.15. In addition, there are no details of proposed watercourse crossings, which are normally subject to design and consent requirements. Similarly, while two additional detention basins are mentioned, there is no information on how water quality will be managed in these features, unlike the detail provided for the BESS and substation basins.
- 5.8.16. Greenfield runoff rates have been calculated using the IH124 method via the HR Wallingford SuDS tool. FEH methods are typically preferred, however this method is commonly used.
- 5.8.17. No consideration has been given to whether the solar panels and associated structures can withstand the impacts of lateral flood flows, which is essential to ensure structural stability and prevent damage during flood events.
- 5.8.18. The current assessment does not consider or model the potential loss of floodplain storage resulting from the placement of inverters and transformers. While gravel filled filter trenches are proposed to manage surface water runoff, these measures do not mitigate the displacement of floodwater. In addition, no information is provided on whether the transformers are classed as sensitive infrastructure or whether they will be elevated above the design flood level with an appropriate freeboard. This omission creates uncertainty regarding their resilience in a flood event.
- 5.8.19. It has been noted that a basin is proposed at Sutton le Steeple, however, no details have been provided regarding its layout, sizing, design criteria, or function within the overall drainage strategy. Without this information, the effectiveness of the basin in managing surface water and flood risk cannot be assessed.
- 5.8.20. Groundwater monitoring data indicates that levels are within 1 m of the surface in some locations. It is unclear whether this has been fully considered in the design of filter drains and ponds, particularly with respect to their storage capacity, and potential groundwater surface water interactions. No assessment has been provided on seasonal fluctuations, nor has any commitment been made to ongoing monitoring.
- 5.8.21. Multiple gravel trenches are shown across the site and appear to function as buffers to disrupt overland flow, however, their purpose, capacity, and hydraulic operation are not defined. Applicant states that gravel trenches will be installed around inverter impermeable pads, but no design details have been provided. It is unclear what storage volume they provide, what infiltration rates have been assumed, or whether they outfall to a receptor. Without this information, there is no clarity on how stored water will be managed once the trenches are full. In their current form, there is a risk of channelised flow concentrating towards the site's low points, offering no surface water benefit under exceedance conditions and potentially increasing off-site flood risk.

5.8.22. Access tracks are described as impermeable but given their compacted construction, they are likely to increase runoff rates and velocities, with associated scour risk on adjacent drains and watercourses. The tracks also introduce a higher pollution load than the existing baseline. Construction and operational traffic will mobilise silt and sediment, and vehicle use can introduce hydrocarbons, metals, and other contaminants. During rainfall, these contaminants and suspended solids are likely to be washed from the track surface into nearby watercourses if not intercepted. The section does not appear to address these impacts or set out mitigation, leaving uncertainty over both hydrological and water quality effects.

5.8.23. While a section on maintenance has been provided, it does not cover how key SuDS components such as swales, ditches, ponds, or filter drains will be managed. Without specific maintenance requirements, there is a risk that these features could lose effectiveness over time through siltation, vegetation overgrowth, blockages, or structural deterioration. This lack of detail creates uncertainty over the long-term resilience and performance of the proposed drainage system.

5.8.24. The current documentation does not explain how compaction of the ground during construction activities will be managed. At present, the ground is relatively undisturbed, but sustained traffic from excavators, delivery wagons, and dumpers over the course of the works is likely to compact soils. This compaction could significantly reduce infiltration potential and increase surface water runoff compared to existing conditions, thereby undermining the performance of SuDS features and increasing flood risk.

5.8.25. The purpose of the proposed SuDS features is unclear, as they are not connected to any defined drainage system and there is no evidence of catchments discharging into them. The drainage strategy also lacks the necessary detail to demonstrate how the system will operate in practice. Key information is missing, including how runoff will be collected and conveyed to filter drains, how water will enter and pass through these features, the proposed surface materials for the BESS compound and substation areas, whether all the features will be lined, details of penstocks or other flow control structures, and adequately detailed long sections, cross sections, and construction details.

Recommendations and Conclusions

5.8.26. It is recommended that the Applicant:

- produce a site wide exceedance routing plan showing primary and secondary flow paths, measures to protect sensitive infrastructure, and ultimate discharge locations. Consider exceedance where surcharging may occur.
- provide clear justification for excluding firewater management at the substation, confirming either that the risk is negligible or that appropriate alternative containment measures are in place.
- provide quantitative evidence, such as calculations or modelling, to demonstrate that the solar arrays will not increase runoff, particularly under different ground conditions and maintenance scenarios.

- demonstrate the drainage features can operate under surcharged conditions.
- confirm the proposed heights of the solar panels above ground and demonstrate compliance with the Environment Agency's requirement for a 300 mm freeboard above the 1 in 100 year + climate change fluvial flood level.
- provide details of all proposed watercourse crossings and secure the necessary consents. They should also include information on water quality management for the two additional detention basins, to ensure consistency with the approach taken for the BESS and substation.
- provide a detail for the gravel trenches, including confirmed function and design criteria. Storage calculations assumed infiltration rates, and defined outfalls and/or high-level overflows.
- should update the drainage strategy to consider access track runoff, scour potential.

5.8.27. It is recommended that:

- the design of the solar panels and associated infrastructure includes an assessment of resilience to lateral flood flows to ensure structural stability and minimise the risk of damage during flood events.
- the applicant assesses and quantify any loss of floodplain storage resulting from the placement of inverters and transformers including their foundations, and, where necessary, incorporate compensatory storage to ensure no increase in flood risk. The sensitivity of the transformers should be clarified within the FRA/drainage strategy, with confirmation provided on their finished floor levels.
- that detailed information is submitted for the proposed basin in Sutton Le Steeple, including layout plans, design capacity, hydraulic modelling, and supporting calculations, to demonstrate that it has been appropriately designed and will provide the required level of flood risk mitigation.
- that infiltration potential is confirmed through BRE 365 compliant infiltration testing at the proposed SuDS locations to provide robust evidence for the drainage strategy and ensure that alternative measures are appropriately justified if infiltration is not feasible.
- the maintenance plan should be expanded to include specific requirements for each SuDS feature, including inspection frequencies, sediment removal, vegetation management, structural repairs, and safe access for maintenance teams.
- that a soil management plan is developed to address the risk of compaction during construction. This should include measures such as limiting construction traffic to defined haul routes, using low ground pressure machinery where feasible, phasing works to minimise disturbance, and undertaking soil decompaction.
- the Drainage Strategy is updated to demonstrate the purpose and benefits of the SuDS features and how they integrate with the overall drainage strategy. We would like to see outline engineering detail of all proposed drainage and SuDS features. This should include catchment and collection arrangements, inlet and outlet structures, confirmation of pond lining, penstock and flow control details, and clear long sections,

cross sections, and typical details for swales, filter drains, ditches, ponds, and associated infrastructure.

Design Parameters

5.8.28. The design parameters are generally well defined and reflect agreement with key stakeholders, including the LLFA and IDB. They cover flood event allowances, buffer distances, easements, and runoff restrictions for critical assets. However, there are no details of any new crossings provided.

Hydrology, Hydrogeology, Flood Risk and Drainage

5.8.29. How the development could affect rivers, drains, groundwater, flooding, and water quality during construction, operation, and when it is eventually taken down. Flood maps, geology, water quality data, past flood events, and locations of water supplies were assessed. During construction, there's a risk of pollution (chemicals, muddy water, concrete washout) and extra runoff increasing flood risk. To manage this, work areas will be kept away from watercourses, temporary drainage will be used, and new crossings will be designed not to block flows. Any damaged drains will be repaired. Overall, impacts are expected to be minor and not significant. During decommissioning, the same controls and good practice will apply as in construction. An Outline Decommissioning Plan will guide this, including how to deal with cables at the end of their life. Again, impacts on flood risk and drainage are expected to be minor and not significant. An extra opportunity has been identified to help reduce flooding in Sturton le Steeple. The project proposes an additional SuDS basin, designed specifically to hold back surface water flowing across the site from higher ground.

Summary of Recommendations

5.8.30. The information provided in the FRA and supporting drainage documentation is sufficient to outline the overall strategy, and we have no fundamental concerns with the proposed approach. However, there are areas where information is limited or missing, which makes it difficult to confirm full compliance with agreed design parameters. We recommend NCC request further information from the Applicant to address the following:

- Confirm that the IDB has been formally consulted on discharge proposals and watercourse crossings and provide evidence of agreed design principles. Include meeting minutes with the LLFA/IDB
- Provide details of all proposed watercourse crossings, including confirmation of design flood standards, soffit levels, and arrangements to maintain existing flows.
- Confirm that all sensitive infrastructure will be raised a minimum of 300 mm above the 1 in 100 years + climate change fluvial flood level, in line with EA requirements.
- Attenuation storage provision. Applicant to confirm sufficient storage can be accommodated in view of the following:
 - o Variance in greenfield runoff rates. FEH methods would typically be preferred for the estimation of greenfield runoff rates. Surcharged outfalls. There does not

appear to have been consideration of potential surcharging and the implications for attenuation storage provision.

- The applicant should provide quantitative evidence to confirm that the solar arrays will not increase runoff.
 - Site wide exceedance routing plan to confirm protection of sensitive infrastructure and no predicted impacts to third parties in line with EA/LLFA agreements.
 - Provide justification for excluding specific firewater storage at the substation or confirm alternative measures to ensure containment in an incident.
 - Confirm the drainage system can operate under surcharged outfall conditions.
 - Undertake hydraulic modelling at the requested 62% climate change allowance.
 - Breach analysis be carried out to assess the BESS's vulnerability to floodwater, including stability, washout.
 - Resilience of solar panels and infrastructure to lateral flood flows is assessed to ensure stability and minimise flood damage.
 - Loss of floodplain storage from inverter/transformer foundations is quantified, with compensatory storage provided if required, and transformer sensitivity confirmed.
 - Design, capacity, and modelling information is provided for the proposed basin at Sutton Le Steeple.
 - BRE 365 infiltration testing is undertaken at SuDS locations to confirm feasibility and justify alternatives if infiltration is unsuitable.
 - Design, storage, infiltration, and overflow/outfall information for the gravel trenches.
 - Update the drainage strategy to address access track runoff, scour potential, and pollution risks.
 - Expand the maintenance plan so it includes all SuDS featured.
 - It is recommended that a soil management plan is prepared to mitigate compaction risks during construction through defined haul routes, suitable machinery, phasing, and decompaction.
 - We recommend that the drainage strategy is revised to fully consider SuDS that integrate with the overall drainage scheme and are not bolted on.

6. Development Consent Order

6.1. NCC has reviewed the draft DCO and has the following comments to make, however these are not exhaustive and NCC may have further comments to make during the examination process.

PART 3 STREETS

6.2. The County Council is the Local Highway Authority (LHA) for the order limits of the proposed project. The following comments are made with respect to PART 3 of the Draft DCO (STREETS).

6.3. Article 8 allows the undertaker to perform street works on any of the streets specified in Schedule 3. NCC requires that any street works are subject to the Nottinghamshire County Council Permit Scheme Order 2020, which is made under Part 3 of the Traffic Management Act 2004. This will ensure the LHA is able to retain coordination and control of road works to reduce disruption for road users. NCC would refer the applicant to Article 9 of the made 'Tillbridge Solar Order' where this approach was applied.

6.4. Article 9 allows the undertaker to carry out alterations or works to any of the streets specified in Schedule 4. NCC would require such works to be subject to full technical approval from the street authority with the associated costs to the street authority to be covered by the undertaker.

6.5. The technical approval process should follow the same process as would be followed in relation to highway works which are secured under a S278 Agreement, pursuant to a planning condition under the Town and Country Planning Act. The process for technical approval should be agreed with NCC and described within the Outline Construction Traffic Management Plan (oCTMP).

6.6. Article 10 allows the undertaker to form and lay out temporary and permanent means of access at the locations described at Schedule 5. As above, such works should be subject to full technical approval from the street authority with the costs to the street authority to be covered by the undertaker.

6.7. The DCO should require any of the alterations to the streets specified in Schedule 4 and any means of access described at Schedule 5 to be completed to the satisfaction of the street authority.

6.8. Article 13 allows the undertaker to impose traffic regulation measures, with the written consent of the traffic authority. NCC would seek clarity on the proposed procedure for consultation and approval of any TTRO and recommends that this is agreed with NCC and described within the oCTMP. Whilst the obligation to publish the proposed measure in one or more local newspaper is noted, it is standard practice within Nottinghamshire for a bulletin to be issued to relevant stakeholders. NCC would request the cooperation of the undertaker in this respect, by either directly issuing the bulletin itself or by supplying the dates/times, locations and diversions and contact numbers for the LHA to issue.

SCHEUDLE 2 – REQUIREMENTS

6.9. NCC notes the list of requirements at Part 1 of Schedule 2, which are to be discharged by the Local Planning Authority (LPA), which would be Bassetlaw District Council. Several of the requirements relate to the responsibilities of the County Council and it is recommended that these are discharged by the County Council, with any fees payable under Part 2 paid directly to the County Council (rather than the LPA). This includes Requirements 8 (Construction Traffic Management Plan) and 13 (Public Rights of Way Diversions), which should be discharged by the Highway

Authority, and Requirement 16 (Surface and Foul Water Drainage) which should be discharged by the Lead Local Flood Authority.

6.10. The precise wording of the requirements should be agreed by the LPA and, where relevant, NCC.

6.11. In Nottinghamshire, proposals are being developed to reorganise local government which, if implemented, would result in a single tier of local government. Therefore, the dDCO should enable any of the requirements in Schedule 2 to be discharged by a superseding local authority, if necessary.

6.12. Part 2 states that where an application has been made to the relevant authority for any consent relating to the requirements, relevant authority must give notice to the undertaker of its decision on the application within a period of 8 weeks, or else the requirement will be deemed consented. NCC considers that notification of a decision within 8 weeks as a standard approach is insufficient.

6.13. NCC is particularly concerned with the resourcing of such requirements and therefore considers that a default period equating to Major Environment Impact Assessment development for a planning application of 16 weeks would be more appropriate. As an absolute minimum, the period for determination should be 10 weeks, for parity with the period applied in the recently made Tillbridge Solar Order, though this is still insufficient. Whilst NCC notes that Part 2 includes the option to agree an alternate period, the expectation for 8 weeks would be set by its inclusion in the standard wording.

6.14. The project is significant in size and scale and the information submitted for many of the requirements is likely to involve a significant amount of information and an appropriate time period must be afforded for the LPA and/or NCC to consider this, including time to consult with other relevant organisations. This issue would be compounded by the combination of other NSIP projects within the county, should they gain development consent. These projects follow a similar timeline and will place cumulative pressure on the statutory functions of the planning departments and other statutory functions.

6.15. NCC notes that where an application to discharge a requirement is made, a fee is to apply and must be paid to the local planning authority for each application. This must apply to the relevant planning authority, which in some cases should be the County Council as LHA and LLFA. Whilst the fee payable would be based upon the fee prescribed under regulation 16(1)(b) of the Town and Country Planning Regulations 2012(a), further clarification could be provided on how this is to be applied. In other DCOs, the exact figure to be paid (index linked) has been negotiated with the Councils and stated in the DCO.

7. Summary

- 7.1. This LIR has undertaken an assessment of the likely issues and impacts that NCC considers will arise from the construction and operation of the Steeples Solar Farm with respect to its administrative area and its areas of expertise and statutory responsibility.
- 7.2. The LIR has identified several negative or inconclusive effects at this stage which NCC believes can be addressed, at least in part, through further assessment work and mitigation measures.
- 7.3. NCC may wish to make further representations as appropriate during the examination and at issue specific hearings particularly with regard to environmental and transport matters discussed within this report. Therefore, the comments contained above are provided without prejudice to the future views that may be expressed by the County Council as an Interested Party in the examination process.

NOTTINGHAMSHIRE COUNTY COUNCIL RESPONSE TO EXAMINATION QUESTIONS – 8TH JANUARY 2026

ExQ1	Question to:	Question	NCC Response
1. General and cross-topic questions			
Q1.0.4	The applicant and All Interested Parties	<p>2025 revisions to National Policy Statements (NPSs)</p> <p>Following a review of the energy NPSs, the government consulted on updates to EN-1 (the overarching energy NPS), EN-3 (renewable energy infrastructure) and EN-5 (electricity networks) in April to May 2025.</p> <p>After considering responses to the consultation, the government is due to publish revised versions of EN-1, EN-3 and EN-5 following a 21-sitting day 'consideration period'.</p> <p>Please set out any implications for the consideration of the proposed development arising from the updated NPS.</p>	NCC have no comments to add.
Q1.0.5	The applicant and All Interested Parties	<p>Solar roadmap</p> <p>The Solar roadmap: United Kingdom powered by solar was issued by the Department for Energy Security and Net Zero on 30 June 2025.</p>	<p>The scenario that the waste is recycled or recovered is preferable, the recycling capacity facilities to do this for the PV panels is not established, particularly at the scale that will be needed when considering the cumulative impacts of several solar farm schemes in this area expected to finish around a similar time. This issue is recognised in the recently published Solar Roadmap: United Kingdom Powered by Solar June 2025) by the Department for Energy Security & Net Zero. Without the</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>Please set out how the proposed development would align with the measures set out in roadmap.</p>	<p>development and establishment of sufficient solar panel recycling facilities, this would lead to a large volume of waste in the area at the time that requires disposal.</p> <p>Other similar schemes in Nottinghamshire, for example One Earth Solar Project, have within their assessment of waste considered an absolute worst-case scenario whereby the waste is not able to be recovered or recycled. They have also considered the local and regional existing landfill capacity to understand potential significance impacts. Whilst the Outline Decommissioning Plan notes that forecasting future landfill capacity is difficult and that disposal of waste to landfill is the worst-case scenario, which the Council agrees with, there is though no detailed assessment of the significance of impact in this worst-case scenario, in relation to application and for cumulative effects, nor the recognition of the growing national issue around the limited landfill capacity. In Nottinghamshire particularly there is a lack of non-hazardous landfill capacity as identified in Table 11 of the new Nottinghamshire and Nottingham Waste Local Plan.</p> <p>As raised in paragraph 5.58 and paragraphs 7.38 – 7.41 of the Waste Local Plan, due to underlying geology of the area and wider environmental constraints, the scope to provide hazardous and non-hazardous capacity in Nottinghamshire is extremely unlikely. This therefore stresses the importance of considering the absolute worst-case scenario.</p>
Q1.0.6	Nottinghamshire County Council	<p>Local Impact Report Each page in the Local Impact Report (LIR) [REP1-014] is labelled as 'draft'. Confirm whether this is document is the Council's final version. If so, please provide a revised copy with 'draft' removed from the pages within the document and if not, advise when the final version will be submitted.</p>	<p>Final version of the LIR is attached with draft watermark removed. We apologise for this error.</p>
Q1.0.7	Bassetlaw District Council and	<p>Development Plan Policies Provide full copies of all development plan policies</p>	<p>See attached Appendix 1 - for full copies of Mineral Local Plan and Waste Local Plan policies and other guidance referred to in our LIR.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

	Nottinghamshire County Council	<p>and any accompanying guidance that has been referred to in the LIR [REP1-014]. Should either of the councils refer to any additional development plan policies at any time in your future submissions then, if they have not already been provided, please also submit copies of these into the examination. The ExA also asks to be kept up-to-date on changes to the status of any Development Plan which a local authority has previously relied upon during Examination.</p>	.
Q1.0.8	Bassetlaw District Council and Nottinghamshire County Council	<p>Neighbourhood Plans Reference has been made to the Sturton Ward Neighbourhood Plan in relevant representations. Please submit a copy of this plan and in addition, can you confirm whether there are any other relevant made or emerging neighbourhood plans that the Examining Authority (ExA) should be aware of? If there are can you:</p> <ol style="list-style-type: none"> 1. Provide details, confirming their status and, if they are emerging, the 	NCC defer to Bassetlaw District Council on this matter.

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>expected timescales for their completion.</p> <p>2. Provide a copy of the made plan, or any draft / emerging plan, signposting to any relevant part.</p> <p>3. Indicate what weight you consider the ExA should give to these documents.</p>	
Q1.0.9	The Applicant, Bassetlaw District Council and Nottinghamshire County Council	<p>Planning obligation Please confirm whether a section 106 planning obligation would be required for the proposed development. If not, explain why not and if so, provide details of the topics and issues that an obligation would be required to cover and why.</p>	<p>NCC have not requested any section 106 planning obligations. Unless there are any items to be mitigated that cannot be dealt with through the requirements from a NCC perspective it is unlikely that a s106 would be required.</p>
4. Design, parameters and other details of the proposed development			
Q4.0.2	Bassetlaw District Council and Nottinghamshire County Council	<p>Local design policies Paragraph 2.8 in the Design and Access statement [APP-184] refers to footnote 122 in paragraph 4.7.5 of NPS EN-1 stating design principles should take into account guidance including National Infrastructure Commission principles, the National Design Guide and National Model Design Code, as well as any local design policies and standards.</p>	<p>NCC would draw attention to the NCC Highway Design Guide Highway design guide Nottinghamshire County Council</p> <p>Nottinghamshire County Council does not have any other local design policies and standards relevant to solar development.</p>

		Do the councils have any local design policies and standards relevant to solar development? If so, to what extent has the proposed development addressed any design policies and standards	
Q4.0.4	The applicant, Bassetlaw District Council and Nottinghamshire County Council	<p>Independent Design Review</p> <p>There appears to be no mention in the application documents explaining whether there has been any previous input from a design champion or engagement in a design review process or whether there is any intention for this going forward.</p> <p>1. Noting paragraph 4.7.14 of NPS EN-1, can the applicant explain whether the design process has been, and also whether any final design would be, subject to an independent design review process? If not, explain why not?</p> <p>2. Do the councils consider that provision should be made within the dDCO for the final design of the proposed development to be subject to an independent design review process? If so, explain how the council</p>	<ol style="list-style-type: none"> 1. Paragraph 4.7.14 of NPS EN-1 encourages the use of independent design review where appropriate, particularly for projects where design quality may materially influence environmental, landscape or visual effects. 2. It is not essential for the dDCO to mandate a formal independent design review process, provided that robust design controls are secured through Requirements relating to: <ul style="list-style-type: none"> • Detailed design and layout; • Materials and colour treatment; • Landscape mitigation and long-term management; • Construction compounds, access routes and site management. <p>The imposition of a mandatory independent design review panel may introduce uncertainty regarding how recommendations would be implemented, enforced or weighed against any statutory approval process. However, where key components of the scheme remain subject to post-consent design development, the Councils acknowledge that an independent design review group may add value, provided that:</p> <ul style="list-style-type: none"> • Any review process is advisory rather than determinative; • The scope, timing and remit of the review are clearly defined; • The Councils are engaged in the process, including agreement of the brief; • Any recommendations are capable of being secured through subsequent Requirement approvals.

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>would engage in such a process.</p> <p>3. Are there any components of the proposed development that the councils consider would particularly benefit from a design review? If so, explain what these are and why and if not, explain why not.</p>	<p>It is important that, should an independent design review be undertaken, its findings are clearly documented and form part of the decision-making context for any subsequent approvals.</p> <p>3. NCC consider that, while the Proposed Development as a whole does not necessarily require mandatory independent design review, certain components could benefit from additional design scrutiny, particularly where final solutions are yet to be confirmed and where landscape and visual effects may be influenced by detailed design choices. These components may include:</p> <ul style="list-style-type: none"> • Large above-ground built elements, such as substations, where scale, massing, form, materials and colour treatment will have a strong influence on landscape and visual effects; • Construction compounds and temporary works, where mitigation is inherently difficult to implement effectively, particularly in relation to: Proximity to residential receptors of high sensitivity; Visual intrusion arising from plant, materials storage and welfare facilities; and access routes and vehicular movements affecting existing vegetation and landscape features; and • Landscape mitigation measures, including landform, bunding, boundary treatments and structural planting, where long-term integration with the receiving landscape is critical.
5. Biodiversity and ecology (including Habitats Regulations Assessment)			
Q5.0.5	Nottinghamshire County Council	<p>Biodiversity Net Gain The LIR [REP1-014] paragraph 5.3.15 states a Biodiversity Net Gain (BNG) metric spreadsheet was not available for review at the time of the most recent submission and more detailed comments will be provided at a later stage. The ExA in its recommendations, and the</p>	<p>NCC have reviewed the metric in full and are satisfied the proposals in terms of habitat creation and enhancements are appropriate and are of a suitable achievable level i.e. the condition of the habitats proposed.</p> <p>The stakeholder engagement undertaken by the ecology team for this project has resulted in the BNG metric including inputs at outcomes such as strategic significance to be correct at the time of submission (omitting the publication of the Nottinghamshire LNRS, which was after the application submission).</p> <p>NCC have no further comments in relation to BNG for this application with the only request that all data obtained as part of the survey work such as the veteran trees</p>

		<p>Secretary of State in its decision, will need to decide the weight to attach to any BNG that could be delivered in its planning balance conclusions. As such, could the Council provide detailed comments on the suitability of the BNG metric table in Appendix 7.12.1 [APP-114]?</p>	<p>are reported to the relevant bodies i.e. Nottinghamshire Geological and Environmental Records Centre and the Ancient Tree Inventory (Woodland Trust).</p>
Q5.0.7	Nottinghamshire County Council	<p>Decommissioning during nesting bird season Your relevant representation [RR-052] and paragraph 5.3.10 of the LIR [REP1-014] requests that no decommissioning works are undertaken within nesting bird season and this secured, as the mitigation for ground nesting skylark should increase the number of territories and nests across the site. The applicant in response to the RR [REP1-008] states that it is likely that year-round works to remove arrays would be required on decommissioning and the need for pre-decommissioning surveys would be secured in requirement 21 of the dDCO. Furthermore, the ExA notes that the oDP</p>	<p>NCC considered this as suitable, as an ecologist will survey and advise as prior to the commencement of the decommissioning works. It is inevitable that ground nesting species will be displaced by solar panels and the compensation is partial, and we are satisfied that this has been recognised as an adverse residual impact within the ES Chapter.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>[APP-090] states “Where reasonably practicable, vegetation clearance works would be undertaken outside the bird breeding season (March-August inclusive). To allow the ExA to further understand NCC’s position, can the Council confirm whether the applicant’s response is sufficient to address your concerns or if not, explain further why no decommissioning works, which presumably includes the solar arrays, should take place during the nesting bird season.</p>	
7. Cumulative affects and interactions with other projects			
Q7.0.1	Bassetlaw District Council and Nottinghamshire County Council	<p>Updates on development</p> <p>Please provide an update on any submitted planning applications or consents granted since the application was submitted that could either affect the proposed development or be affected by the proposed development which have not been referred to in the application documents and whether these would affect the conclusions reached in the ES</p>	<p>NCC is not aware there are additional planning applications or consents which need to be referred to.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

Q7.0.2	All interested parties	<p>Report on the Interrelationships with other National Infrastructure Projects Following the submission of the above report [REP1-012] by the applicant at deadline 1, please provide any comments on the suitability of the report.</p>	<p>NCC consider that REP1-012 is suitable as a high-level coordination and interrelationship update in respect of nearby NSIP schemes. However, it does not address strategic cumulative landscape effects arising from the unprecedented number, scale and geographic extent of renewable energy and associated National Grid projects in the region.</p> <p>The mass and scale of multiple NSIP-scale energy developments, when considered alongside the Steeple Renewables Project, have the potential to result in adverse cumulative effects on landscape character across a wide area, spanning multiple published landscape character areas in Nottinghamshire and Lincolnshire. Over the operational period, the landscape will be altered through extensive land-use change and the introduction of energy infrastructure into landscapes that are predominantly agricultural in character. Large-scale solar development is not currently identified as a defining characteristic within existing published landscape character assessments. The Councils consider it likely that solar and associated energy infrastructure will become a distinctive and defining landscape characteristic in future character assessments.</p> <p>NCC do note the absence of a unified county-wide landscape character baseline across Nottinghamshire and Lincolnshire. To address this, we promote an approach whereby common landscape attributes are drawn from the multiple character assessments covering the region to establish a reasoned, strategic baseline for cumulative assessment. Across east Nottinghamshire and western Lincolnshire these commonly include arable land use, large-scale field patterns, flat or gently undulating landform, open landscapes with big skies, dispersed settlements and high levels of rural tranquillity.</p> <p>On this basis, NCC consider that cumulative large-scale solar, battery and energy infrastructure development would result in extensive cumulative landscape character change, particularly affecting openness and tranquillity. Accordingly, while REP1-012 provides an initial interrelationship report, it could be strengthened to address strategic cumulative landscape character change across multiple character areas, and to align clearly with the cumulative landscape assessment approach within the LVIA, beyond scheme-by-scheme or distance-based screening.</p>
--------	------------------------	---	---

Q7.0.3	Bassetlaw District Council and Nottinghamshire County Council	Cumulative sites Can the Councils confirm whether they are satisfied with the list provided in ES Appendix 2.3 - Cumulative Sites Long List and Short List [APP-088] or whether there are any further projects that should be included?	NCC are satisfied with the list provided in ES Appendix 2.3.
8. Compulsory acquisition, temporary possession and other land or rights consideration			
Q8.0.13 Bassetlaw District Council and Nottinghamshire County	Bassetlaw District Council and Nottinghamshire County	Council Reasonable alternatives/ necessity In your roles as the local planning authority and the highway authority are you aware of: 1. Any reasonable alternatives to CA or Temporary Possession for land sought by the applicant? 2. Any areas of land or rights that the applicant is seeking the powers to acquire that you consider would not be needed? Please identify which plots these are and explain why you consider they would not need to be acquired.	NCC is not aware of any alternatives to CA or temporary possession and is content with the land in question being sought for this project
9. Draft Development Consent Order (DCO)			
Q9.1.4	The applicant and Nottinghamshire County Council	Inspection of plans Confirm whether NCC has agreed to the stated location in the explanatory note for	Yes, NCC agree.

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		inspecting the application documents.	
Q9.2.4	Interested parties	Article 2(1) – Interpretation (definition of “site preparation works”) Do any parties disagree with the extent of operations that would be covered under the definition of site preparation works? If so, please explain why.	NCC agree, the definition allows the applicant to carry out the diversion and laying of services, NCC should consider if this is appropriate or whether that element should be removed from the definition in case it would permit works to the highway which should not be permitted to be carried out until the Requirements have been discharged. The definition of ‘site preparation works’ should not allow for works which are so extensive that they would be likely to have significant environmental effects themselves, and would normally need consideration and approval by the discharging authority prior to such works starting. Typical examples of matters which are not acceptable preliminary works include major earthworks, clearance of trees and ground clearing, activities affecting protected species or archaeological remains, unless appropriate controls are secured in another manner.
Q9.2.12	The applicant and Nottinghamshire County	Council Article 8 – Street Works 1. Should paragraph (1)(a) be expanded with the following words (added in bold) to improve precision: ‘Break up or open the street, or any sewer, drain or tunnel within or under it;’? Please clarify and amend accordingly. 2. Is paragraph (3) necessary given that “apparatus” is defined in article 2 and also noting that the EM implies that it has been omitted? 3. The LIR [REP1-014] explains that any street works are subject to the Nottinghamshire County Council Permit Scheme Order 2020. Notwithstanding your	3 - Application of the permit scheme 9.—(1) The permit scheme applies with the modifications set out in this article to street works carried out under the power conferred by article 8 (street works) of this Order. (2) For the purposes of this Order— (a) a permit may not be refused or granted subject to conditions which relate to the imposition of moratoria; and (b) a permit may not be granted subject to conditions where compliance with those conditions would constitute a breach of this Order or where the undertaker would be unable to comply with those conditions pursuant to the powers conferred by this Order. (3) References to moratoria in paragraph (2) mean restrictions imposed under section 58 (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial street works) of the 1991 Act. (4) Without restricting the undertaker’s recourse to any alternative appeal mechanism which may be available under the permit scheme or otherwise, the undertaker may appeal any decision to refuse to grant a permit or to grant a permit subject to conditions pursuant to the permit scheme in accordance with the mechanism set out in Schedule 15 (procedure for discharge of requirements) of this Order. “the permit scheme” means the Nottinghamshire County Council Permit Scheme Order 2020, as applicable for the location of the relevant street works, which schemes are made under Part 3 of the Traffic Management Act 2004;

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>reference to article 9 of the made 'Tillbridge Solar Order', can NCC provide details of the wording you are seeking to this article? The applicant is also asked to comment on the Council's request generally for the works to be subject to a permit scheme and if it does not agree to this request, then to explain why.</p>	
Q9.2.14	Nottinghamshire County Council	<p>Articles 9 and 10 – Request for full technical approval Your LIR [REP1-014] explains you require the undertaker to seek full technical approval from the street authority with the associated costs to the street authority to be covered by them. Provide details of the wording you are seeking to these articles to incorporate this provision.</p>	<p>The form of wording sought in respect of Articles 9 and 10 to incorporate technical approval from the Street authority is as follows:</p> <p><i>Schedule 2 Part 1 Requirements – (3) Detailed Design Approval</i></p> <p><i>The list in 3 (1) could be expanded to include ...until details of –</i></p> <p class="list-item-l1">(a) Layout, including Road Safety Audit (RSA Stage 1 & 2), road signage, road markings, if required by the LHA</p> <p class="list-item-l1">(b).....</p> <p class="list-item-l1">(c).....</p> <p class="list-item-l1">(d)</p> <p class="list-item-l1">(e)</p> <p class="list-item-l1">(f)</p> <p class="list-item-l1">(g)</p> <p class="list-item-l1">(h)</p> <p class="list-item-l1">(i)</p> <p class="list-item-l1">(j)</p> <p class="list-item-l1">(k) <i>A programme for the works, details of the construction method and traffic managements requirements.</i></p> <p class="list-item-l1">(l) <i>Details of any service/utility works that need to be renewed, diverted and accommodated</i></p> <p class="list-item-l1">(m) <i>Details of the main contractor including their insurance provision</i></p> <p class="list-item-l1">(n) <i>Details of the proposed remediation should the works be temporary</i></p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

			<p>(o) <i>Details of the appropriate health & safety information required under Construction, Design & Management Regulations or equivalent legislation</i></p> <p>3 (2) <i>The details submitted must accord with the -</i></p> <p>(a).....</p> <p>(b).....</p> <p>(c)</p> <p>(d) <i>The details submitted will need to meet the highway design and specification implemented by the Local Highway Authority (LHA). This will require a Section 278 technical audit of the proposed highway works by the LHA and the LHA will need to recover the costs incurred. No works within the public highway may commence until the technical approval has been issued and the appropriate fees have been paid.</i></p> <p>The County Council as local highway authority is willing to discuss this wording further as part of the examination stage and agree the process of approval within the Construction Traffic Management Plan. Please note that the approval process can take up to 12 weeks and the audit and works supervision fees are 12% of build costs.</p>
Q9.2.15	The applicant and Nottinghamshire County	Council Article 11 – Temporary stopping up of streets and public rights of way Is reference to temporary ‘stopping up’ correct or should this refer to temporary ‘closure’ of streets and public rights of way? Please clarify and make any necessary alterations to articles and schedules throughout the dDCO which cross reference this article.	NCC agree this should say ‘closure’.

Q9.2.16	Nottinghamshire County Council, Bassetlaw District Council, Environment Agency and Trent Valley Drainage Board.	Article 14 – Discharge of water Is it necessary for a paragraph to be added that does not permit any activity listed in paragraph 3(1) of Schedule 21 to the Environmental Permitting (England and Wales) Regulations 2016? If so, please explain why and if not, explain why not.	<p>NCC agree it is necessary to include a paragraph which does not permit any activity listed in paragraph 3(1) of Schedule 21 to the Environmental Permitting (England and Wales) Regulations 2016, which provides:-</p> <p>(1) A “<i>water discharge activity</i>” means any of the following—</p> <ul style="list-style-type: none"> (a) the discharge or entry to inland freshwaters, coastal waters or relevant territorial waters of any— (i) poisonous, noxious or polluting matter, (ii) waste matter, or (iii) trade effluent or sewage effluent;
Q9.2.18	The applicant, Nottinghamshire County Council, Bassetlaw District Council and the Environment Agency	Article 14(5) – Discharge of water Paragraph 5 refers to ‘main river’ although no definition is provided as to what this includes. Should the following definition highlighted in bold be added to paragraph (8) after sub-paragraph (b) to improve precision: “ <i>main river</i> ” means watercourses as defined under section 113(1) of the Water Resources Act 1991 and shown as such on the statutory main river maps held by the Environment Agency and the Department for Environment, Food and Rural Affairs. If so, please amend accordingly or explain why this is not necessary.	NCC defer to the EA as this relates to a ‘main river’.
Q9.2.19	The applicant, Nottinghamshire	Article 14(9) – Discharge of water 1. Can the applicant	NCC considers that a 28 day period is generally appropriate if a similar period has been incorporated into the DCOs for similar solar schemes.

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

	County Council, Bassetlaw District Council and the Environment Agency	explain the measures you have taken to ensure that all parties who could be affected by this provision, such as owners of any watercourse, public sewer or drain, have been made aware of the deemed consent provision. 2. Do the councils and the EA consider that the 28-day period specified for issuing a decision of an application for consent a sufficient period of time? If not, explain why not and what you consider an appropriate period of time for issuing a decision would be.	
Q9.4.5	The applicant, Nottinghamshire County Council, Bassetlaw District Council and Natural England	Requirement 6 – Landscape and ecological management plan (LEMP) Sub-paragraph (e) would secure a minimum 10% BNG during operation. The ExA notes that the Secretary of State has included specific percentage figures for the minimum biodiversity net gain to be secured in recently made solar DCOs', such as The Byers Gill Solar Order 2025 and The Tillbridge Solar Order 2025 which are higher than the minimum 10%. NE [RR-054] has also referred	<p>In general terms, NCC would support the promotion of a higher BNG in line with other solar DCOs (greater than 10%).</p> <p>NCC would suggest that the the BNG figures be set out as a separate requirement? Rather than just requiring over 10% net gain. The level of BNG to be provided at the site will need monitoring and management over the proposed 40-year period. This is usually set out within a HMMP which would be secured via planning condition/the Biodiversity Net Gain condition on normal planning applications. The LEMP functions as this document for this DCO application. Could more weight be given to the requirement of the LEMP and include monitoring measures including a schedule of monitoring reports submitted to the LPA.</p> <p>The Outline Landscape and Environmental Management Plan (OLEMP) provide a framework for future detailed designs and management of the scheme, but long-term commitments (well beyond 5 years) for establishment, monitoring and replacement planting must be secured.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>to similar provisions in both the The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024.</p> <p>1. Noting that Appendix 7.12 - Biodiversity Net Gain Report [APP-114] sets out that the proposed development would result in a net gain of 54.93% for habitats, 35.53% for hedgerows and 14.68% for watercourses, can the applicant explain why these specific percentages are not secured on the face of the dDCO.</p> <p>2. Is more clarification required as to the 'details' required to secure BNG. For example, is a separate strategy required to secure this?</p> <p>3. In the absence of these percentages being secured on the face of the dDCO, what weight can the ExA give to these figures being delivered?</p>	<p>Without this, the predicted Year 15 reductions in landscape and visual effects cannot be relied upon.</p>
Q9.4.21	The applicant, local authorities and statutory consultees	Requirement 25 – Consultation To improve precision, is a timescale required to be added stipulating a time period for	Yes, NCC considers that a period of 10 working days would be appropriate.

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		another person or body to provide comments to the undertaker?	
9.5 Schedule 2 Part 2 – Procedure for discharge of requirements			
Q9.5.2	The applicant and host authorities	Requirement 27 – Applications made under requirements The ExA is aware that 'The Byers Gill Solar Order 2025' and 'The Tillbridge Solar Order 2025' contained additional paragraphs requiring applications to be accompanied by a statement confirming whether it is likely that the subject matter of the application will give rise to any materially new or materially different environmental effects compared to those in the environmental statement and containing information setting out what those affects are. Any applications which would give rise to new or materially different environmental effects compared to those in the environmental statement would not benefit from the deemed benefit provisions as specified under subparagraph (3).	NCC support the inclusion of this provision.

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>1. Can the applicant explain whether consideration was given to incorporating similar paragraphs within the dDCO and confirm whether you would consider incorporating such provisions within the dDCO. If not, explain why not.</p> <p>2. The host authorities are asked for their comments on the inclusion of such a provision.</p>	
10. Flood risk, drainage and the water environment			
Q10.0.1	Environment Agency, Nottinghamshire County Council and Bassetlaw District Council	<p>Suitability of sequential and exception test Do you have any comments on the suitability of the sequential assessment for flood risk and the Exception Test contained in sections 6 and 7 of [APP-186] and particularly whether it satisfies the requirements of section 5.8 of NPS EN-1?</p>	NCC defer to the EA.
11. Historic environment			
Q11.0.2	Fields for Farming, Historic England and Nottinghamshire County Council	<p>Littleborough Roman Town Scheduled Ancient Monument The written representation from Fields for Farming (FfF) in respect of Historic Environment [REP1-032] explains that the Scheduled Ancient Monument site presently</p>	<p>NCC believe that the ribbon development adjacent to the Scheduled Monument is highly likely a part of the Roman town and there is a strong argument for extending the scheduling to include it. However, Historic England curate the list under the 1979 Act and therefore determine whether or not this will occur. NCC would suggest that some limited evaluation work within the ribbon development area to establish the date and state of preservation would be necessary to establish an evidential basis for further scheduling and determine the actual significance of the remains present.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>covering the main Roman settlement is being extended to cover the ribbon developments and other important remains detected during the recent surveys. It is further stated it would include fields to the left of the current road from Littleborough to Sturton.</p> <p>1. Can FfF provide further details on the stated extension to the Scheduled Ancient Monument and particularly whether this is subject to a formal process. If so, are there any timescales for implementation? Are any areas of the development proposed on the areas referred to?</p> <p>2. Can Historic England (HE) and NCC provide their understanding of the current position in respect of the comments made by FfF?</p>	
Q11.0.3	Nottinghamshire County Council and Historic England	<p>England Extent of Harm to North Leverton Windmill (Grade II* listed) The third bullet point in paragraph 5.1.8 considers that the impacts on the setting of North Leverton Windmill are likely to be at the highest end of 'less than substantial</p>	<p>1 - Yes, the less than substantial harm to the setting of North Leverton Windmill, is based on the clearly discernible immediate and wider landscape impacts and is considered to be 'less than substantial' on the basis that impacts on setting are in accordance with guidance and case law, considered to be indirect, however the impacts are considered to be at the highest end of the category.</p> <p>In addition, impacts on the potential viability of North Leverton Windmill as a visitor attraction are based on the level and extent of landscape change and erosion to the rural attractiveness through industrialisation of landscape character. The financial</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>harm' category with regards to the NPPF. The fourth bullet point then states that you consider the impact to North Leverton Windmill, and to a lesser extent Burton Chateau, would fall into the 'substantial harm' category with regards to the NPPF in the lack of evidence to prove otherwise.</p> <ol style="list-style-type: none"> 1. Can NCC clarify the different extent of harm findings between the two bullet points. Do the different conclusions on harm relate individually to 'setting' and 'financial viability'? If so, what do you consider would be the totality of harm to the significance of this asset as a consequence of the proposed development? 2. Can NCC explain what evidence you require to consider the effect? 3. Can HE provide their position on the effects to this asset noting the different positions between the applicant and other parties? 	<p>viability of North Leverton Windmill is like virtually all heritage assets of this type, reliant on large amounts of dedicated volunteer time, grant funding and visitor donations. A reduction in visitor numbers to this area of the Trent Valley is predictable as a result of de-ruralisation (less farming activity) and industrialisation that would have potential direct economic impact on any heritage attraction within this area, but especially one (such as a windmill) that is closely linked to rural heritage.</p> <p>This is considered to be direct harm and has the potential to be 'substantial' as a result of reduced income to support the operation of the windmill. The viability of Burton Chateau as overnight accommodation is clearly linked to the heritage interest of the building and it's setting. The wider rural landscape of the Trent Valley features in photos on the Landmark Trust's website and is part of its marketing for Burton Chateau. The contribution that these views make to the attractiveness of this designated heritage asset as overnight accommodation will be diminished. Indirect harm to the setting of the asset but potential direct harm to its viability.</p> <p>2 - It is difficult to predict the long-term effects of cumulative industrialisation of the agrarian character of the Trent Valley on the viability of heritage assets that, in part, derive their character and value from this landscape setting. Comparative information may be suitable for extrapolation if a suitable landscape change and heritage scenario is available to study. The lower Trent Valley landscape and heritage is dissimilar to other parts of the Trent Valley and it would be difficult to envisage comparing the type of development proposed with, for instance, gravel extraction and restoration, but this might be worth investigating by the applicant. The Landmark Trust could be approached for their opinion on the impact of the proposals in the vicinity of Burton Chateau on it's viability.</p>
Q11.0.5	Nottinghamshire County Council	Crow Tree Farm (Grade II listed)	1. Confirm whether the referred to footpath in paragraph 5.1.4 of your LIR

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

	<p>[REP1-014] which affords views towards this asset is FP20? If not, clarify which footpath your concerns relate to.</p> <p>2. Do the Council's concerns in respect of this asset relate solely to the curtilage buildings that are listed by association, or does it also include the main listed Crow Tree Farm?</p> <p>3. Can the Council provide further details of how the setting and views towards this heritage asset contribute to its significance or allow its significance to be appreciated. Furthermore, explain the effects of the proposed development on the significance or on the ability to appreciate the asset.</p> <p>4. Can the Council confirm, by annotating on a screenshot of the proposed site layout, exactly which areas of the proposed development you consider should be removed and explain: a. What benefits would occur in removing the requested areas? b. To what extent would the significance of this asset be</p>	<p>2 - Both the curtilage buildings and the primary listed farmhouse. The western and southern ranges are most readily intervisible with the proposals.</p> <p>3 - Crow Tree Farmstead contributes to the agrarian character of Sturton, approaching the village from the west across open fields enables an appreciation of the listed buildings as an historic farmstead. This farmland is crucial to the understanding of the agrarian heritage and to the appreciation of the significance of the farm.</p> <p>4 - Area 1 highlighted Appendix 2 – removal from proposals would preserve the existing views across the agrarian setting of the listed farm from FP20. Appreciation of the setting would also be preserved from FP19.</p> <p>Area 2 highlighted in Appendix 2 – removal from the proposals would preserve the appreciation of the agrarian setting of the farm from FP20.</p>
--	--	--

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		preserved by removing the requested areas?	
Q11.0.6	Nottinghamshire County Council	<p>Group of listed buildings along Main Street North Leverton 1. Confirm whether the referred to footpath in paragraph 5.1.5 of your LIR [REP1-014] which affords views towards this asset is FP24? If not, clarify which footpath your concerns relate to.</p> <p>2. Can the Council confirm exactly which listed buildings along Main Street your concerns relate to and provide further details of how the setting and views towards each of those identified individual heritage assets contribute to their significance or allows significance to be appreciated. Furthermore, explain the effects of the proposed development on the significance or on the ability to appreciate each asset.</p> <p>3. Can the Council confirm, by annotating on a screenshot of the proposed site layout, which areas of the proposed development should be removed and explain: a. What benefits</p>	<p>1 - Yes, footpath 24 offers the best views.</p> <p>2 - North Leverton Manor House (410125). Views from the upper floors of the listed building outwards are at present open fields, the western side will become dominated by views of the solar array. Users of FP24 walking westwards will no longer appreciate the Manor House in its wider agrarian setting, the solar array will take dominance in the view and erode the appreciation of the significance of the listed building.</p> <p>3 -</p> <p>A - Removing the area highlighted (1) in Appendix 3 would ensure that views north-west from the Manor listed building and north from the Windmill are preserved and views of the listed buildings in their settings from FP24 would also be better preserved.</p> <p>B - The agrarian setting of both the listed buildings (Manor and Windmill) would be better preserved by retaining the field in non-industrial use and character.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		would occur in removing the requested areas? b. To what extent would the significance of this asset be preserved by removing the requested area?	
Q11.0.7	Nottinghamshire County Council	<p>Burton Chateau (Grade II* listed) 1. The LIR [REP1-014] (paragraph 5.1.8, bullet point 1) considers the development will be visible within the design landscape views from this heritage asset and also highlights the importance of views of the Trent Valley rural, agrarian landscape. Do the Council's concerns relate to views out from this asset rather than views towards it? If so, can the Council provide further details of how views out contribute to the significance of the heritage asset or allow the asset's significance to be appreciated?</p> <p>2. The LIR [REP1-014] disagrees with the removal of this asset from thorough examination of impacts on its setting. Can the Council explain what further assessment is required in addition to that provided in paragraphs 6.52 to and</p>	<p>1 - Yes, primarily the concerns are regarding views from the listed building out over the Trent Valley incorporating the proposals. It is clear that Burton Chateau was deliberately placed within the design landscape and pre-dates the later C18th Gate Burton Hall. It was located both as a folly 'eye-catcher' and also to provide views outwards of the wider landscape, including to the west over the Nottinghamshire side of the Trent Valley. The existing tree bank to the north of the building only partially obscure views out from the building and its immediate environs (the small garden area). The impact of solar arrays, glare, BESS etc should not have been scoped out of the assessment, for the reasons given previously in answer to Q11.0.3.</p> <p>3 - With reference to the answer provided to Q11.0.3 we would like to see further examination and presentation of proof that the Trent Valley setting of Burton Chateau is fully appreciated and considered. Furthermore, that there is examination of potential impact on the financial viability of 'The Chateau' through consultation with the Landmark Trust, including how the cumulative impact of Trent Valley solar arrays will impact on their marketing that states: 'The Château stands on a grassy knoll above a big bend of the River Trent on the edge of Gate Burton Park. There are fine views across the park and up a shining reach of the River Trent along which big slow barges, piling the water in front of them, press on towards an enormous power station whose cooling towers steam majestically in the distance'.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		including 6.57 of ES Appendix 9.1 Cultural Heritage Technical Baseline [APP-122]?	
Q11.0.11	Nottinghamshire County Council, Historic England, any other Interested party and the applicant	<p>Buried archaeology – Need for trial trenching The Council's LIR [REP1-014] paragraph 5.2.5 comments that there are “known areas of high archaeological potential and sensitivity” recorded on the Nottinghamshire Historic Environment Records within the order limits and also known significant medieval remains within and around the order limits.</p> <p>1. Can NCC, HE and any other interested party provide further details of any areas which they consider requires further pre-determination trial trenching to be undertaken by the applicant, providing details for their request (particularly in terms of understanding the significance of any assets) and accompanied by a plan of the area in question.</p> <p>2. The applicant is requested to provide its comments on any requests at deadline 3 explaining</p>	<p>See Appendix 4 The blue areas are those proposed for mitigation (avoidance) by the applicant, however no evaluation has been undertaken in these areas to determine significance, state of preservation, date or extent of the remains present.</p> <p>The green circles are areas of identified high archaeological potential from the geophysical survey (undertaken by the applicant) and from records on the Nottinghamshire Historic Environment Record (NHER). The green areas following the site boundary have not been subject to geophysical survey or the results of the geophysical survey have been compromised by ground conditions such as green waste and consequently there is no site-specific information at all on the archaeological resource in these areas.</p> <p>NCC maintain that to fully understand the archaeological resource within the site boundary, the whole site should be subject to trial trench evaluation, with varying degrees of coverage. However, the attached plan identifies those areas of known high archaeological potential that have not yet been investigated by the applicant and their significance and full extent has not been established in any way. NCC strongly recommend that these areas are subject to pre-determination evaluation as a minimum and would be happy to work with the applicant on an appropriate trench plan to achieve this.</p> <p>NCC continue to raise concerns that without site-wide evaluation at the assessment stage, the applicant's ability to identify archaeological remains and their significance is limited. Targeting geophysics results alone introduces confirmation bias in favour of certain periods such as the Roman, medieval and post-medieval periods and underrepresents the pre-historic and Anglo-Saxon periods.</p> <p>For those areas of the full site not evaluated at this stage, provision must be made for evaluation at a later stage, and it would also be helpful to have the applicant prepare an appropriate outline Written Scheme of Investigation at this stage for completing the work.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		whether or not it intends to undertake predetermination trial trenching of any requested areas and provide reasons for any areas it does not intend to	
Q11.0.12	The applicant, Nottinghamshire County Council, Bassetlaw District Council and Historic England, Christian Heritage and the Pilgrim trail	<p>Comments have been raised by Sturton le Steeple Parish Council [RR-029] and [REP1-039] on the effect to Sturton le Steeple's Christian Heritage and the Pilgrim Trail. In response, the applicant [REP1-008] (page 85) notes that the site itself does not form part of the Pilgrim Trail, whose connection is with the relevant churches and settlements, and none of the historic information presented would experience change as a result of the proposals. The response further notes that the related heritage assets, such as the Grade II* Listed Church of St Peter and St Paul in Sturton le Steeple, are considered in the ES.</p> <p>1. Can the applicant explain whether your consideration of identifying the significance of the heritage assets in the ES has considered the matters</p>	<p>The Pilgrim Trail is a significant component of the North Nottinghamshire visitor economy offer. The tourism associated supports a variety of local businesses and is an important component of local identity, the Pilgrim Roots project create educational resources and attracted over £750,000 of Lottery funding. St Peter's and Paul's is part of the 'Mayflower Trail' promoted by Visit Nottinghamshire, Sturton-le-Steeple is the birthplace of John Robertson a very significant person in the story of the Mayflower Pilgrims and the council has contributed considerable staff and financial resources to this story and the related projects. Bassetlaw District Council's museum in Retford is in part dedicated to the Mayflower Pilgrim story and would be able to provide an indication of visitor numbers associated.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

		<p>raised by the Parish Council? If not, explain whether they should.</p> <p>2. Can the applicant explain whether or not the proposed development would affect the appreciation of this historic association?</p> <p>3. Can the applicant advise whether the comments raised by the Parish Council raise any considerations relevant to the Equalities Act 2010?</p> <p>4. Can NCC, Bassetlaw District Council and Historic England provide any comments as to their position of the Parish Council's concerns?</p>	
Q11.0.15	Nottinghamshire County Council	<p>Request to remove permitted development rights Paragraph 5.2.22 of the LIR [REP1-014] seeks the removal of any permitted development rights in areas that have not been properly assessed or been subject to mitigation work or measures. Can the Council expand upon its reasons for seeking this measure, providing any necessary wording that it considers would be appropriate to include in the dDCO?</p>	<p>For archaeology, the issue relates to PD in areas that have not been properly evaluated (no reliable data on archaeological potential) or areas where archaeological potential has been identified, but development did not impact at the time of construction and therefore no mitigation work has been undertaken.</p> <p>In such cases, PD will have an adverse and negative impact on either currently unknown archaeological sites, or sites of significant archaeological potential that have not been subject to mitigation work as part of the initial development.</p> <p>NCC are reviewing the dDCO and will provide additional wording in due course.</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

13. Landscape and Visual

Q13.0.4	All interested parties	<p>Viewpoint locations and photomontages Further to the question above noting comments raised on this matter, are there any specific locations where parties consider should be included in the viewpoints and photomontages? If so, please provide full justification as to why those locations are required, the receptors that they would represent and what they would provide in addition to that not included in the current suite of viewpoint locations and photomontages.</p>	<p>It is understood that these viewpoints are what is allowed for in the LVIA process and methodology but it is insufficient and a 'blunt tool' that does not allow for a proper analysis and, where appropriate, the design of thoughtful and effective mitigation strategies, using screening. NCC have no specific viewpoint locations to suggest, but would suggest exploring a 'flythrough' mechanism as a better way of appreciating the dynamic component of moving (walking/riding/driving) through the landscape.</p> <p>Generally, the viewpoint and photomontage locations provide good coverage of the proposed development. These have been refined through consultation and subsequently agreed upon.</p> <p>However, there was prolonged discussion at the ISH1 regarding why Viewpoint 18 – Sheet A – High House Road / Trent Valley Way had been selected. It was felt that this viewpoint did not provide a 'worst case' view of the proposed development. Viewpoint 18 was taken from a railway underpass and views are contained by the location's low elevation and raised embankments. We agree that more visually exposed locations of the High House Road / Trent Valley Way need to be used. We would suggest that Viewpoint 18 is an exception rather than the rule and should be relocated to an appendix. We agree with the ExA's requested additional viewpoint locations on Trent Valley Way as described in Q13.0.3.</p> <p>No clear methodology for the visualisations is provided in the LVIA and more information on this could be provided (refer paragraph 5.5).</p> <p>There was prolonged discussion at the Hearing regarding why Viewpoint 18 – Sheet A – High House Road / Trent Valley Way had been selected. It was felt that this viewpoint did not provide a 'worst case' view of the proposed development. Viewpoint 18 was taken from a railway underpass and views are contained by the location's low elevation and raised embankments. We agree that more visually exposed locations of the High House Road / Trent Valley Way need to be used. We would suggest that Viewpoint 18 an exception rather than the rule and should be relocated to an appendix. We agree with the ExA's requested additional viewpoint locations on Trent Valley Way as described in Q13.0.3.</p>
Q13.1.5	Nottinghamshire County Council	<p>Suitability of assessment findings The Landscape & Visual Review in the LIR [REP1-014] paragraph 4.27</p>	<p>NCCs concern relates specifically to instances within the LVIA where moderate adverse landscape effects are reported and subsequently concluded to be not significant, without sufficient clarity on how the judgements of sensitivity, magnitude of change and significance thresholds have been applied. As stated</p>

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

	<p>advises that there is disagreement with several judgements of moderate landscape effects within the LVIA as being deemed not significant. Can the Council highlight exactly those findings in ES chapter 6 [APP-064] which it disagrees with and why, also explaining any specific receptors where greater transparency is required on how the judgements relating to 'sensitivity' and 'magnitude of change', and the thresholds of significance, have been applied.</p>	<p>in the Landscape and Visual Review (paragraph 4.27), we do not agree that the landscape effects identified as 'Moderate' should be automatically assessed as 'Not Significant'. We would generally expect most 'Moderate' effects to be assessed as 'Significant'. Where effects are 'Moderate' and assessed as 'Not Significant' we would expect an explanation as to the reasoning for this.</p> <p>It is unclear how the applicant has decided upon their selection of landscape receptors due to the limited information provided in the baseline. Consequently, it is difficult to understand how the development proposals will change the landscape baseline. The baseline contains cursory descriptions of character areas and landscape elements with little identification of key features and limited explanation of value and susceptibility judgements.</p> <p>With regards to the landscape Receptors that have been identified; our biggest concerns relate to the landscape features including Woodland, Individual Trees, hedgerows and ground cover (table 6.7 – P88). Greater transparency and explanation are required with these judgements including descriptions of their 'sensitivity', 'magnitude of change' and how the thresholds of significance have been applied. The proposals will see the removal of mature hedgerow (and other mature planting) and its replacement with immature whip planting that will take many years to establish. Even after 15 years, assuming this mitigation planting survives, it will not have reached the same maturity as the removed planting. Therefore, we do not agree that effects on these landscape features can be claimed to be 'beneficial' at year 1 or indeed year 15. We do not think any beneficial landscape effects would result from the development of a large-scale solar farm in a rural location.</p> <p>Landscape receptors that have been chosen favour landscape elements that will not change due to the development and do not include those that will experience the most change – notably the open arable fields. We consider this landscape feature a missing landscape receptor that should be included and assessed within the LVIA.</p> <p>NCC also judge that changes to land use, along with a perception of development and urbanising effect would particularly affect the Mid Notts Farmlands landscape character area, and would result in a Significant adverse effect at all phases (construction and operation). The Development will also have direct adverse effects</p>
--	--	---

			across the Site , again which would have a Significant adverse effect across the Site at all phases (construction and operation).
13.1 Landscape Effects			
Q13.1.5	Nottinghamshire County Council	<p>Suitability of assessment findings The Landscape & Visual Review in the LIR [REP1-014] paragraph 4.27 advises that there is disagreement with several judgements of moderate landscape effects within the LVIA as being deemed not significant. Can the Council highlight exactly those findings in ES chapter 6 [APP-064] which it disagrees with and why, also explaining any specific receptors where greater transparency is required on how the judgements relating to 'sensitivity' and 'magnitude of change', and the thresholds of significance, have been applied.</p>	<p>Our concern relates specifically to instances within the LVIA where moderate adverse landscape effects are reported and subsequently concluded to be not significant, without sufficient clarity on how the judgements of sensitivity, magnitude of change and significance thresholds have been applied. As stated in the Landscape and Visual Review (paragraph 4.27), we do not agree that the landscape effects identified as 'Moderate' should be automatically assessed as 'Not Significant'. We would generally expect most 'Moderate' effects to be assessed as 'Significant'. Where effects are 'Moderate' and assessed as 'Not Significant' we would expect an explanation as to the reasoning for this.</p> <p>It is unclear how the applicant has decided upon their selection of landscape receptors due to the limited information provided in the baseline. Consequently, it is difficult to understand how the development proposals will change the landscape baseline. The baseline contains cursory descriptions of character areas and landscape elements with little identification of key features and limited explanation of value and susceptibility judgements.</p> <p>With regards to the landscape Receptors that have been identified; our biggest concerns relate to the landscape features including Woodland, Individual Trees, hedgerows and ground cover (table 6.7 – P88). Greater transparency and explanation are required with these judgements including descriptions of their 'sensitivity', 'magnitude of change' and how the thresholds of significance have been applied. The proposals will see the removal of mature hedgerow (and other mature planting) and its replacement with immature whip planting that will take many years to establish. Even after 15 years, assuming this mitigation planting survives, it will not have reached the same maturity as the removed planting. Therefore, we do not agree that effects on these landscape features can be claimed to be 'beneficial' at year 1 or indeed year 15. We do not think any beneficial landscape effects would result from the development of a large-scale solar farm in a rural location.</p>

			<p>Landscape receptors that have been chosen favour landscape elements that will not change due to the development and do not include those that will experience the most change – notably the open arable fields. We consider this landscape feature a missing landscape receptor that should be included and assessed within the LVIA.</p> <p>We also judge that changes to land use, along with a perception of development and urbanising effect would particularly affect the Mid Notts Farmlands landscape character area and would result in a Significant adverse effect at all phases (construction and operation). The Development will also have direct adverse effects across the Site, again which would have a Significant adverse effect across the Site at all phases (construction and operation).</p>
13.2 Visual effects			
Q13.2.3	Nottinghamshire County Council	<p>Suitability of assessment findings The Landscape & Visual Review in the LIR [REP1-014] paragraphs 5.10 and 5.11 disagrees with the judgement that there will be no significant visual effects at year 15 and also with several reductions in level of significance of effect at year 15 through the establishment of mitigation planting. With reference to the assessment findings in ES chapter 6 [APP-064] and ES Appendix 6.3 – Viewpoint Assessment ExQ1: Question: [APP-099], can the Council highlight exactly those findings which</p>	<p>As stated in the Landscape and Visual Review (paragraph 4.29 between 5.9 and 5.10), we do not agree that the landscape effects identified as 'Moderate' should be automatically assessed as 'Not Significant'. We would expect most 'Moderate' effects to be assessed as 'Significant'.</p> <p>Many of the assessments of the visual receptors are overly reliant upon mitigation to reduce residual effects with limited consideration of the effect screen planting will have on open landscapes and existing views. It is too often assumed that screening views will reduce the magnitude of change when in many instances the view experienced by receptors will be completely altered from that of the existing baseline view.</p> <p>With regards to the visual Receptors that have been identified; our biggest concerns relate to the visual receptors represented by viewpoints 2A, 2B, 2C, 6B, 12, 13A, 14A, 17A, 17B, 17C and 17D. Greater transparency is required on how judgements relating to 'sensitivity' and 'magnitude of change' and thresholds of 'significance' have been applied.</p>

		it disagrees with and why, also explaining any specific receptors where greater transparency is required on how the judgements relating to 'sensitivity' and 'magnitude of change', and the thresholds of significance, have been applied.	
13.3 Cumulative landscape and visual effects			
Q13.3.3	Nottinghamshire County Council	<p>Sequential cumulative effects</p> <p>The Landscape & Visual Review in the LIR [REP1-014] paragraphs 6.8 to and including 6.10 raises concerns with sequential effects that would be felt throughout the area. The applicant provided further explanation of its findings for sequential cumulative effects during ISH1 [EV5-001]. Can the Council clarify what, if any, additional assessment it requires to consider the potential for sequential effects. In particular, are there any routes, such as public footpaths or local roads, which are of most concern where a more detailed assessment is required? If so, please provide details.</p>	<p>NCC judge that the sequential effects would be felt throughout the area, with PROW users, that are more susceptible to changes in their view, moving slowly and often engaging with the landscape attentively; travel along these PROW would involve repeated contact with solar infrastructure, and would lead to a sequential visual effect.</p> <p>The LVIA has identified several PROWs with High sensitivity experiencing Major or Moderate effects of significance. These routes include Footpath 17 Sturton le Steeple, Footpath 1 West Burton, Cross Common Lane, Trent Valley Way and Digs Hole Lane. The visual receptors on these routes are represented by VP3,6,7,8,10,13,17,20,21. Additionally, key roads through the development include Low Holland Lane, Gainsborough Road, Thornhill Lane, Three legs Lane and Leverton Road. The visual receptors on these routes are represented by VP2,3,5,10,12,14.</p> <p>NCC anticipate that more detailed assessment along these routes is required to understand cumulative effects.</p>

13.4 Residential Visual Amenity Assessment (RVAA)

View our privacy notice at www.nottinghamshire.gov.uk/privacy

Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

Q13.4.6	All interested parties	Assessment of effects Do any interested parties disagree with any of the assessment findings in table 1 of the RVAA [APP-100]? If so, please explain why.	<p>NCC would anticipate that some residents will experience adverse visual effects from several properties. However, no properties were judged to experience Significant visual effects.</p> <p>NCC wish to query that all the following were assessed as having Moderate effects, yet none have been identified as having subsequent Significant effects:</p> <ul style="list-style-type: none"> • 1. St Ives, Gainsborough Road, Sturton Le Steeple, • 11. Keepers Cottage, Leverton Road, • 12. The Old Vicarage, Sturton Road, • 17. Properties on Mill Close, North Leverton, • 18. Properties off Main Street and Manor Grove North Leverton, • 20. Orchard Lodge, Sturton Road, South Wheatley, • 24. 7no. properties on Wheatley Road, • 27. Properties on Station Road, Sturton Le Steeple, • 30. Properties on Cross Street, Crown Court, and Caddow View, Sturton Le Steeple, • 33. The Croft, Freeman's Lane, Sturton Le Steeple, • 36. Properties on Leverton Road, Sturton Le Steeple, • 37 Low Holland House, Low Holland Lane, Sturton Le Steeple • <p>These properties have close-range views of the proposed development, and more explanation is required to explain how the receptors in these properties will not experience adverse visual effects. The scheme has the potential to completely change the baseline views, with panels and subsequently established planting (at year 15) foreshortening views and blocking open and expansive views across this landscape.</p>
---------	------------------------	---	--

Appendix 1 - Nottinghamshire Minerals Local Plan (March 2021) and the Nottinghamshire and Nottingham Waste Local Plan (September 2025) – Relevant Local Plan Policies

Policy MP2: Sand and Gravel Provision

1. An adequate supply of sand and gravel will be identified to meet expected demand over the plan period from:
 - a) The extraction of remaining reserves at the following permitted quarries:

MP2a Newington South
MP2b Finningley
MP2c Sturton Le Steeple
MP2d Bawtry Road
MP2e Cromwell
MP2f Besthorpe
MP2g Girton
MP2h Langford Lowfields
MP2i East Leake
MP2j Scrooby South

- b) The following extensions to existing permitted quarries: (million tonnes)

MP2k Bawtry Road West	0.18mt
MP2l Scrooby Thompson Land	0.06mt
MP2m Scrooby North	0.56mt* (0.62mt)
MP2n Langford Lowfields North	4.70mt* (8.00mt)
MP2o Besthorpe East	3.30mt

- c) New sand and gravel quarries:

MP2p Mill Hill nr Barton in Fabis	3.0mt**
-----------------------------------	---------

Note: The above sites are shown on the Policies Map

Proposals to extract specialist grey sand reserves will be supported where a need can be demonstrated.

Planning applications for site allocations should be made in accordance with the site development briefs set out in Appendix 2

* Available within the plan period (total estimated reserves in brackets).

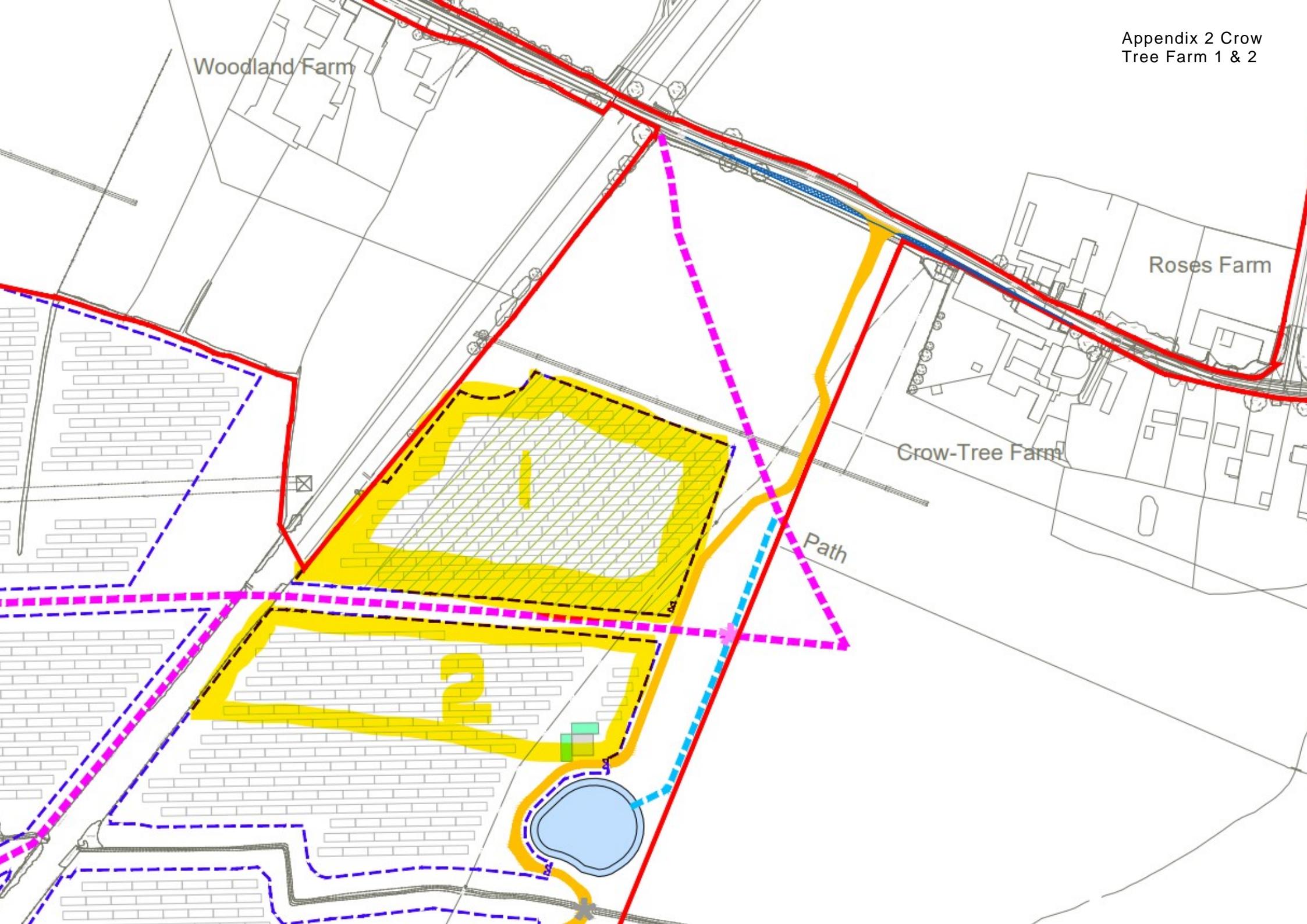
**Excludes potential reserves within the Nottingham City administrative area.

SP1 – Waste prevention and re-use

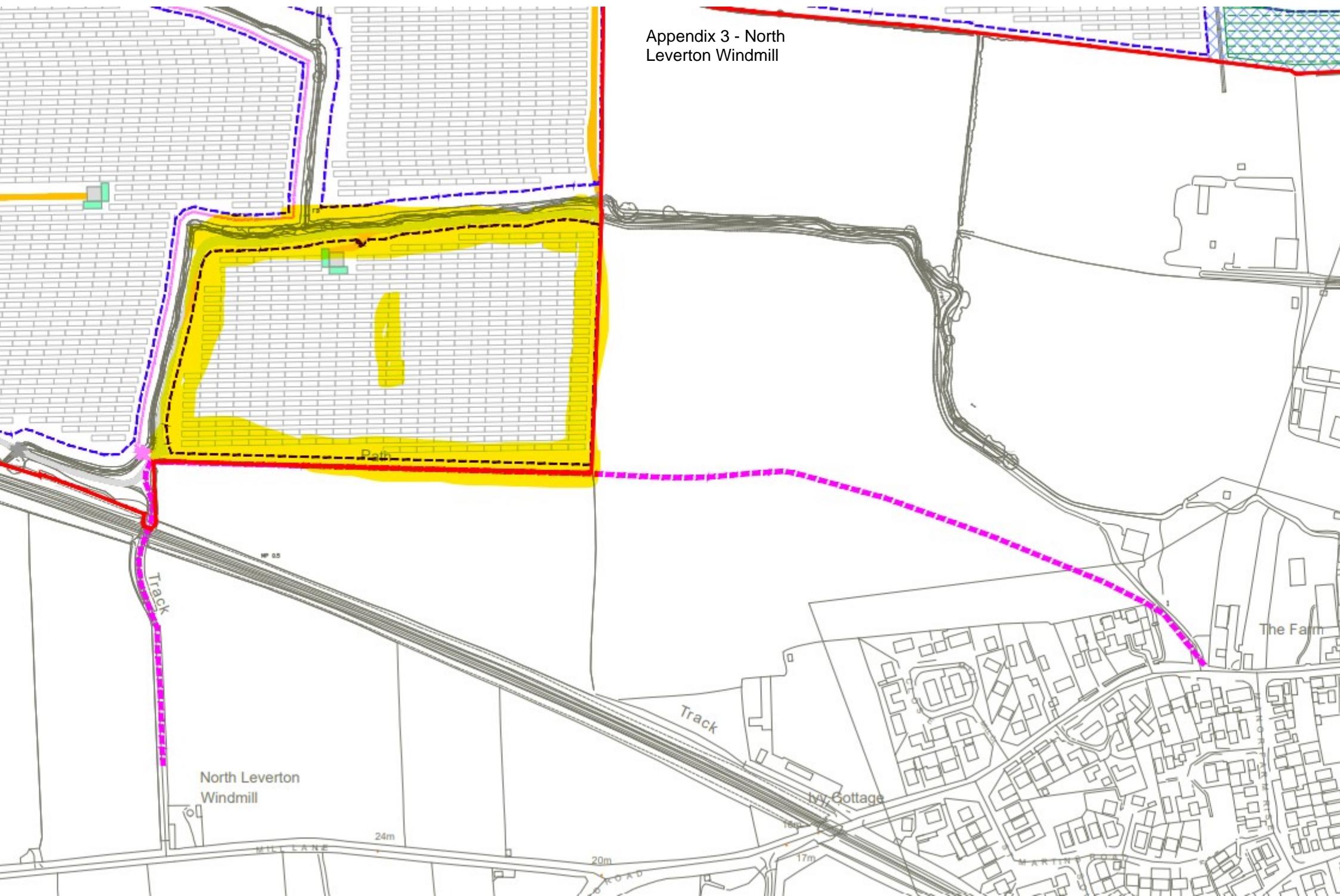
All new development should be designed, constructed, and operated to minimise the creation of waste, maximise the use of recycled materials, and assist with the collection, separation, sorting, recycling and recovery of waste arising from the development during its use.

SP8 – Safeguarding Waste Management Sites

- 1) Nottinghamshire and Nottingham City will seek to avoid the loss of existing authorised waste management facilities, including potential extensions; sites which have an unimplemented planning permission; and facilities to transport waste, such as rail or water.
- 2) Proposals, including both planning applications and allocations in local plans, for non-waste uses near existing or permitted waste management facilities will need to provide suitable mitigation before the development is completed to address significant adverse impacts and demonstrate that the waste management uses can operate without unreasonable restrictions being placed upon them.
- 3) Where proposed non-waste development would have an unacceptable impact on a waste management facility, the applicant will need to demonstrate that there are wider social and/or economic benefits that outweigh the retention of the site or infrastructure for waste use and either:
 - a) The equivalent, suitable and appropriate capacity will be provided elsewhere prior to the non-waste development; or
 - b) The waste capacity and/ or safeguarded site is no longer required
- 4) Where proposals are within the Cordon Sanitaire of a wastewater treatment facility, the applicant will need to discuss the proposal with the water company which operates the site and demonstrate that they have no objections which cannot be appropriately mitigated.



Appendix 3 - North
Leverton Windmill



Appendix 4 - Trenching

