

Consultations for Steeples

Planning Policy

24/00509/PREAPP: Proposed development of a Solar Farm located in Nottinghamshire comprises up to 400MW of solar energy generation and a 200MW Battery Energy Storage System (BESS)

Chapter 5 of the PEIR (Planning Policy) sets out the development plan policies relevant to this proposal. We request that Policy ST9: Large Rural Brownfield Sites is added. We support reference to Sturton Ward Neighbourhood Plan. However, the neighbourhood plan policies should be referenced throughout the PEIR when discussing local planning policies.

Section 2.12 of the PEIR (EIA Methodology) outlines the different stages of the cumulative impact assessment. For completeness, two additional renewable energy schemes (generating up to 50MW) within the Zone of Influence (ZOI) should be considered:

- 24/00384/FUL - Installation and Operation of a Solar Farm and Battery Energy Storage System (Output upto 40 MW), With Associated Works, Equipment, Infrastructure and Landscaping
- 23/01444/FUL - Proposed Solar Farm to Produce up to 34MW of Renewable Energy

In Chapter 6, relevant information on the local planning policy context should be included. We request that reference to Local Plan Policy ST35: Landscape Character is added to the PEIR.

Paragraph 6.3.6 and Table 6.3 list the assessed viewpoint locations. It is important to note that within the Sturton Ward Neighbourhood Plan, Policy 2a considers key views. It is important that the PEIR appropriately considers the key views identified in the neighbourhood plan.

We note in Chapter 15 that less than 20ha of agricultural land on site will be permanently lost. We would welcome confirmation of the amount to be lost and the BMV grade. We would also welcome the additional cumulative schemes referenced above being added to Table 15.6 and elsewhere in the PEIR where cumulative impacts are considered.

It is unclear which Aligned Core Strategy paragraph 15.2.7 refers to because Bassetlaw does not have an aligned Core Strategy.

The Fire Authority has been consulted on the proposal and has made the following comments:

Doncaster City Council commented that they have no objections and attached comments from

Doncaster Airport Safeguarding Officer regarding matters which should be considered should a future application be received

Newark and Sherwood made no comments on the proposal

The Fire Authority has been consulted on the proposal and made no comments on the proposal.

North Leverton Parish Council commented the following:

North Leverton Parish Council considered this application at their Parish Council meeting on 3 February 2025. The Parish Council object to this application on grounds that it contravenes the Sturton Neighbourhood Plan Policy, references Policy 2a 1, Policy 5 1, Policy 5 2f Policy 12 2 d, Paragraph 18.5 and 18.6.

Nottinghamshire County Council Archaeology has commented the following on chapter 9 of the PEIR

Designated Heritage Assets:

The PIER assesses the impact of the scheme on designated heritage assets (9.7). The impact has been assessed as '**not significant**' for the heritage assets cited (9.7.10 – 9.7.17) and for those identified in the study area (9.7.18). A reassessment of these in response to the Conservation Team e-mail of 05.02.2025 is recommended.

Baseline Conditions:

Previously, we stated that 'A programme of evaluation trenching to cover a minimum of 3% of the order limits will be necessary to properly identify and characterise the archaeological resource within the site. This is necessary to inform the cultural heritage chapter of the Environmental Statement (ES) and the DCO application.'

This earlier advice remains valid, and ground-proving of geophysical survey results has shown archaeological features are missed, as illustrated in the analyses of the efficacy of geophysical surveys and guidelines on the use of this field survey technique¹.

9.6.17 The majority of the scheme has been geophysically surveyed and positively contributed to our understanding of the archaeology in the landscape, and to date notably the Roman town of Segelocum and its extent and hinterland (**Appendix 9.2**).

9.6.18 We question the statement 'archaeological potential is, therefore, contained within discrete areas and is not widespread across the entire site' due to the likelihood that the

geophysical survey will not have identified archaeological features. Similarly, the proposed strategy to 'sample some blank areas' is considered insufficient for the reasons stated above, but we welcome that the results of fieldwork will 'inform the design and/or mitigation work.' Discussion in respect of fieldwork and mitigation is on-going and led by the archaeological advisor at NCC.

Assessment of Likely Significant Effects

9.7.4 A programme of evaluation trenching to cover a minimum of 3% is recommended to properly identify and characterise the archaeology within the site for the reasons laid out above. There has been strong, positive engagement with this issue and discussion is on-going for this phase of fieldwork to be concluded.

9.7.5 The suggestion that the cable route corridor will be subject to a watching brief is accepted in principle. Where significant archaeology is found, areas under monitoring should be expanded to assess the extent, extent, date and depth of the features to characterise the archaeology to inform any further mitigation measures that may be required during the development or decommissioning phases.

9.7.20 Decommissioning will require the removal and dismantling of equipment and materials. A full method statement will be required to assess any potential future impacts and what mitigation measures may be needed.

Mitigation & Enhancement

9.8.2 We welcome measures that preserve in situ significant archaeology. We welcome measures that preserve in situ significant archaeology; 'no dig' construction methods may affect below-ground archaeology due to the cumulative impact of the system employed and compaction arising from vehicle movements.

During the scheme's operational phase, no intrusive groundworks should be undertaken in areas not directly affected by construction activity and where no previous archaeological evaluation, excavation or monitoring has been undertaken until this has been undertaken or measures are put in place to prevent access or disturbance to these areas.

An Archaeological Clerk of Works will be required and responsible for monitoring archaeological mitigation measures for the preservation in situ areas and will need to be included in a conditioned management plan to ensure protection measures stay in place throughout the development and no intrusive groundwork occur in these areas.

9.8.3 We welcome the aims outlined in this paragraph and encourage community engagement.

9.8.4 & 9.9.8 Decommissioning may lead to further ground disturbance and or compaction and utilisation of previously un-investigated areas for contractors' compounds, vehicle parks and recycling facilities. Provision for archaeological monitoring and recording and or further fieldwork is required to ensure suitable mitigation measures are in place. It is recommended that an Archaeological Clerk of Works is conditioned for to ensure regular monitoring of these areas to confirm these are not disturbed during the lifetime of the scheme and or during decommissioning.

Residual Effects

9.9.6 – 9.9.9 Periodic archaeological monitoring during the scheme's operational use is recommended to ensure that in situ remains are protected and that any required maintenance and replacement minimises further harm to below-ground heritage assets. If no significant archaeology is identified during the current programme of fieldwork, this recommendation will be un-necessary.

Draft DCO:

Requirements for access to undertake archaeological surveys and fieldwork is specified in the draft DCO (**Interpretation 2.(1), (a)** page 6; **Authority to survey and investigate the land 16.(1)(c)**).

Absent from the draft order is a specific schedule and condition for the completion of the evaluation trial trenching, further mitigation measures (excavation) and post-excavation analysis and publication.

At present, the draft DCO has no requirement for the completion of the evaluation trial trenching and or any additional mitigation measures that may arise from the fieldwork.

The DCO requires redrafting to address the above. The following is an example of the wording from a recently consented scheme where the DCO has been issued (Mallard Pass):

Archaeology

12.—(1) The authorised development may not commence until

(a) a scheme of additional trial trenching has been submitted to and approved by each relevant planning authority, in consultation with Historic England;

(b) additional trial trenching has been carried out in accordance with the scheme approved under sub paragraph (a); and

(c) updates are made to the written scheme of investigation to account for the results of the additional trial trenching carried out, and the updated written scheme of investigation is submitted to and improved in writing by each relevant planning authority, in consultation with Historic England.

(2) The authorised development must be implemented in accordance with the updated written scheme of investigation approved under sub-paragraph 1(c), and any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to each relevant planning authority.

I will be very happy to discuss the above with you and in liaison with NCC's archaeological advisor, who is taking a lead on NSIPs.

The District Council's Environmental Health Officer has provided the following comments

Noise

The construction and operational noise and vibration, appear to have been considered.

It appears the proposed development will not have a significant adverse impact from noise on surrounding residents, but I would be cautious to accept any increase in levels above those currently predicted. Opportunities can be explored at the detailed design stage to reduce the specific sound levels by a selection of equipment, site orientation, acoustic enclosures, or noise barriers. I would certainly support this approach and would welcome further details of the likely impact from noise following the detailed design stage.

I note that the proposed construction working hours are detailed as 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturday.

Except in case of emergency, operations should not take place on site other than between the hours of 08:00 - 18:00 Monday to Friday and between 08:00 - 13:00 on Saturdays. There should be no working on Sundays or Public Holidays. At times when operations are not permitted work shall be limited to maintenance and servicing of plant or other work of an essential or emergency nature. The Local Planning Authority should be notified at the earliest opportunity of the occurrence of any such emergency and a schedule of essential work shall be provided.

Pollution Prevention and Control

Given the potential significance of these impacts, we urge the Secretary of State to ensure that a comprehensive Environmental Impact Assessment (EIA) is conducted, addressing the following specific concerns:

Dust during Construction:

The construction phase could generate dust, which could adversely affect air quality and the health of nearby residents. Measures to mitigate dust emissions, such as water spraying, dust screens, and monitoring, should be thoroughly evaluated and implemented.

Noise:

Construction and operational phases are likely to produce noise that could disrupt local residents. An assessment of noise levels, along with proposed mitigation strategies such as sound barriers and restricted working hours, should be included.

Glare from Solar Panels:

If the development includes solar panels, there is a risk of glare affecting nearby properties and road users. A detailed glare assessment, considering the positioning and angle of the panels, is essential to mitigate any adverse effects.

Historic Land Contamination:

The site may have a history of contaminative land use, raising concerns about existing land contamination. A thorough investigation into the extent of contamination, including soil and groundwater testing, may be necessary. Appropriate remediation plans must be developed to ensure the site is safe for its intended use.

Risk of Future Land Contamination:

The proposed development activities may introduce new contaminants into the environment. An evaluation of potential contamination sources and robust strategies to prevent future contamination should be an integral part of the EIA

PRoW the Definitive Map for the site plan of Steeple Renewables Project and can confirm 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.

Trent Valley Internal Drainage Board has commented:

There are numerous Board maintained watercourses potentially impacted by the site.

With regard to the request for consultation response regarding the above project I would advise that the proposed development crosses areas under the control of Trent Valley Internal Drainage Board.

There are numerous watercourses that are likely to be impacted by the development, principally by the proposed route of the Cables but also potentially above ground installations and accommodation works.

I feel that it is important to raise some specific issues that will need to be considered further and in detail as a part of the DCO process.

All Board watercourses are subject to Byelaws, which are intended to protect the watercourses and the Board's ability to maintain them. With this in mind I would advise the following.

Byelaw Number 3 states that:

No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended (“the 1990 Act”)) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water in any watercourse in the District (without the previous consent of the Board).”

Consent will only be granted for the increase in flow to a watercourse where the Board is happy that in doing so no demonstrable harm will be caused. It may be the case that appropriate mitigations are required to be put in place to either attenuate flow or to enhance the existing watercourse to ensure no detriment. If this is not possible alternative outfall locations may need to be considered.

Byelaw Number 10 states that:

No person without the previous consent of the Board shall erect any building or structure, whether temporary or permanent, or plant any tree, shrub, willow or other similar growth within nine metres of the landward toe of the bank where there is an embankment or wall or within nine metres of the top of the batter where there is no embankment or wall, or where the watercourse is enclosed within nine metres of the enclosing structure.

This will relate primarily to any above ground installations and their proximity to any Board maintained watercourses.

Byelaw number 17 states that:

No person shall without the previous consent of the Board -

(a) place or affix or cause or permit to be placed or affixed any gas or water main or any pipe or appliance whatsoever or any electrical main or cable or wire in, under or over any watercourse or in, over or through any bank of any watercourse;

(b) cut, pare, damage or remove or cause or permit to be cut, pared, damaged or removed any turf forming part of any bank of any watercourse, or dig for or remove or cause or permit to be dug for or removed any stone, gravel, clay, earth, timber or other material whatsoever forming part of any bank of any watercourse or do or cause or permit to be done anything in, to or upon such bank or any land adjoining such bank of such a nature as to cause damage to or endanger the stability of the bank;

(c) make or cut or cause or permit to be made or cut any excavation or any tunnel or any drain, culvert or other passage for water in, into or out of any watercourse or in or through any bank of any watercourse;

(d) erect or construct or cause or permit to be erected or constructed any fence, post, pylon, wall, wharf, jetty, pier, quay, bridge, loading stage, piling, groyne, revetment or any other building or structure whatsoever in, over or across any watercourse or in or on any bank thereof;

(e) place or fix or cause or permit to be placed or fixed any engine or mechanical contrivance whatsoever in, under or over any watercourse or in, over or on any bank of any watercourse in such a manner or for such length of time as to cause damage to the watercourse or banks thereof or obstruct the flow of water in, into or out of such watercourse.

Provided that this Byelaw shall not apply to any temporary work executed in an emergency but a person executing any work so excepted shall, as soon as practicable, inform the Board in writing of the execution and of the circumstances in which it was executed and comply with any reasonable directions the Board may give with regard thereto.

The Board will require all watercourses to be crossed by means of an appropriate trenchless method at a depth no less than 2 metres PLUS the safe working distance below the hard bed level of all watercourses (to ODN if EA or IDB maintained).

The purpose of this requirement is to allow the IDB to maintain and have the flexibility to improve watercourses in the future due to climate change (works will include deepening & widening of watercourses).

Any culverting or other works within the bed of any Board maintained watercourse be they temporary or permanent will require consent. It will usually be assumed that these structures will be temporary measures to accommodate haul roads etc.

It is anticipated that the above requirements would be covered by SOCGs, MOU, and via Protective Provisions within the DCO. This matter should be discussed further and in more detail as the proposed route is refined.

Any culverting or other works within the bed of any riparian watercourse within the Board's district or extended area, be they temporary or permanent will also require consent.

It should be noted that the Board's consent is required irrespective of any permission gained under the Town and Country Planning Act 1990. The Board's consent will only be granted where proposals are not detrimental to the flow or stability of the watercourse/ culvert or the Board's machinery access to the watercourse/ culvert which is required for annual maintenance, periodic improvement and emergency works. The Board would not look to be disapplying these powers unless they have been suitably agreed and covered within the protected provisions embedded within the DCO.

I hope that the above is of assistance and I look forward to further ongoing detailed discussions with regard to the proposal.

Parish Council meeting held on Tuesday 11th February, the North and South Wheatley Parish Council

voted to unanimously reject this planning application on the following basis:

The huge scale of 1700 acres which will surround Sturton le Steeple and affecting neighbouring villages.

It will remove a very large amount of productive agricultural land used for food production, which it will never get back.

Wildlife habitat will be adversely affected.

Footpaths will be adversely affected - negatively altering the countryside where residents walk and live -

effectively industrialising a small rural community.

The land under solar farms will not be capable of supporting agriculture or animal grazing and in contrast it is

likely to become very hard affecting its ability to absorb water, which is likely to exacerbate the flooding issue that

Sturton le Steeple and South Wheatley already regularly suffer from and which is only likely to get worse.

The area has already had more than its fair share of infrastructure including power stations and associated

electricity pylons - including the new National Grid Pylons, as well as the development of West Burton for nuclear

fusion. Huge solar farms will affect house prices without increasing the number of job opportunities for residents.

The amount of land put forward for the solar farms appears to be speculative and we have seen no strategic plan

i.e. how much land is actually needed to generate 400MW of solar energy versus the need for land to provide the

UK with food security etc. We have also seen no strategic plan for the rest of the UK and how much acreage is

been proposed for each county.

Overall the plans for such an overwhelmingly large solar farm - swamping local rural communities - are likely to

have a significant impact on the wellbeing and mental health of many residents.

It will decimate farms ending multi-generational farms and putting family members and labourers out of work, it

will also reduce business for many agricultural based industries within the area.

Sturton Le Steeple

1

Jacqueline Bryan

From: clerk@sturtonlesteeplesparishcouncil.gov.uk

Sent: 19 February 2025 11:19

To: Planning

Subject: Planning Application Consultation 24/00509/PREAPP

External Message - Be aware that the sender of this email originates from outside of the Council. Please be cautious when

opening links or attachments in email

I am writing on behalf of Sturton le Steeple Parish Council, which represents the view of the residents

of the parish of Sturton le Steeple and surrounding areas affected by the Steeple Renewables

Project.

The local community set up an independent working party know as Fields for Farming, writing to all

residents asking for their feedback on the planning proposal. The Parish Council would like to put

forward this feedback and fully support the outcomes found within it.

Residents overwhelming objected to the proposed construction of a large solar farm on the designated agricultural land in our community. 738 responses were received with 732 opposed and 6

supporting, that a 99.2% objection rate. While as a Parish Council we recognize the importance of

renewable energy, the chosen location for this project raises several significant concerns for our

residents as detailed in the survey.

Sturton Ward Neighbourhood Plan

The Sturton Ward Neighbourhood Plan was consulted upon widely with residents and businesses

and approved by referendum in 2016. Since that there have been significant changes in UK energy

policy with the closure of the coal fired power station at Cottam and the subsequent closure of West

Burton Power Station. The Sturton Ward Neighbourhood Plan Review updates a number of policies

including landscape policies to provide more policy protection for parts of the Ward most valued by

the community.

Paragraph 18.5 refers particularly to solar energy production, and states...

“On appropriate sites in the countryside, the use of solar energy is supported provided the development: a) is effectively screened from view; and b) does not harm the landscape character of

the Ward; and c) is supported by a comprehensive package of ecological mitigation and enhancement measures.

Paragraph 18.6 states... “The need to safeguard heritage assets and landscape character will be a

key consideration in any renewable energy proposal”

Whilst the Parish Council appreciates that this proposal will be decided at the national level, It is

clear that it does not conform to local planning policy guidelines and would be rejected if determined

at a local level.

Residents Comments

“It seems ridiculous to me that this issue is not being managed strategically across the entire country. The Government have allowed this to become a free-for-all”.

Loss of countryside / wildlife habitat

95.5% of surveys returned showed concern for the loss of countryside and wildlife habitat. The

environmental impact on local wildlife cannot be overlooked. The area is home to various species,

many of which could be disturbed or displaced by the construction and operation of the solar farm.

The disruption of habitats and natural ecosystems poses a significant risk to biodiversity and the

overall environmental health of our region.

The proposed solar farm spans a vast area, disproportionately large relative to the size of our

community. This extensive footprint will inevitably lead to the transformation of a considerable

portion of our landscape, fundamentally altering the character and aesthetics of our rural

environment. Alteration of land use will have a profound impact on local wildlife habitats, water

drainage patterns, and soil integrity. Our community prides itself on its scenic, open spaces and

agricultural heritage, both of which are threatened by the imposing scale of this development.

Residents Comments

“We need to preserve hedgerows and field for wildlife”.

“Skylark, Yellowhammer and Grey Partridge all breed in these fields. They are red listed birds

(endangered) and should not be disturbed

Loss of farmland for food Production

95.7% of residents object because the land earmarked for this solar farm is currently used for

farming and food production. Our agricultural sector is vital not only for local food supply but also for

supporting the livelihoods of numerous families in our area.

Residents Comments

“This Area has become a target for renewable energy companies. Good quality agricultural land

should not be used for this purpose”.

“Us young people can see that it is very short sighted to think solving the ‘energy crisis’ with taking

food production sites for solar is not logical, and there are other locations. Sturton does enough for

industry”

“It is not sensible to sacrifice food security for energy security where there are obvious alternatives.

The decision is based upon personal profit without regard to local or national interests”.

“This proposal is far too big, it completely engulfs one village and would mean that the land in our

parish would be 90% industrialised. It is a rural farming area and should remain so. Fields are for food

not solar panels”.

“New homes should be made to have solar panels when building and agricultural land for crops”.

“The countryside is too valuable for food production. Solar is unreliable and a poor producing

alternative to wind power. The scale of the scheme is just outrageous”.

Loss of Agricultural Jobs

86.7% of residents were concerned about the loss of jobs. The chosen site for the solar farm is

currently productive agricultural land that supports a variety of crops. This land is not only crucial for

local food production but also forms the backbone of our rural economy. The transformation of

productive farmland into a solar energy site will inevitably lead to the loss of agricultural jobs, affecting those who rely on this industry for their income. This shift could have devastating economic

consequences for our rural community.

Residents Comments

“Use Solar on all new build houses and all industrial sheds/railway stations etc, not on our natural

productive biodiverse farming land. You are killing jobs and the environment with this greed and

shorted sighted vision”.

Density of existing developments in the area (Nuclear Fusion project, Quarry, National Grid Upgrades. Other large solar projects)

81.9% of resident expressed concern over the volume of project presently going through the planning process. It has been estimated that if RES were to go ahead 90% of the parish would be

industrialised which will have a significant impact on everyone living in the parish.

Residents Comments

“The pylons for the National Grid upgrade are bad enough. We don't need to take on any more of this

in this area. Enough is Enough”

“West Burton Power Station worked hard to maintain good relations with our local community. This

proposal outrageously swamps, destroys and invades the local area. It feels like a slap in the face

and is very upsetting”

“We can't bear to imagine being completely surrounded”.

“This proposal will have a catastrophic impact on the local communities and also productive

farmland. The sheer size and location is disgusting and disrespectful”.

“The agricultural land and green landscape needs to be preserved for future generations and the

longevity and protection of the environment”.

“RES disregard any criteria that will have an effect on the community financially, environmentally,

quality of life, visual aspect etc. They have swamped this area because of easy access to the grid so

more profit for them”.

Increased traffic during the construction

76% of residents had severe concerns about the increase in traffic during the construction

phase. A large-scale project like the one proposed will bring an influx of heavy machinery and

increased traffic to our small, rural community. Our infrastructure is not equipped to handle the

massive increase in traffic, which will not only disrupt daily life but also pose safety risks to residents

and schools. The noise, dust, and general disturbance during the construction period will negatively

affect the quality of life for those living nearby.

Residents Comments

“This will drastically change the countryside where we live, the traffic through the village is already

causing terrible damage and construction traffic will be horrendous”.

Climate Change

A number of residents commented on climate change and the ‘bigger picture’. Here are some

examples:

“Importing food and drink from overseas does nothing to reduce climate change. By reducing the

amount of space for food production, would only increase food mileage and could negate the good

created by solar energy. Development of brownfield sites for industry or housing should include a

clause for solar energy to be incorporated”

“All new houses by law have to have certain levels of insulation to reduce heat loss. All new houses

by law should also have solar panels on roofs”.

“Solar panels are not green. How are they made? Where do the materials come from? We are sold a

lie!”

“We need to keep all the farmland free from development of all kinds if we want to be a substantial

country. Crops are failing all over the world and with climate change the position will only get worse”.

“The amount of land suitable for agriculture on our planet is fairly fixed and we are already reaching

the limit to its ability to feed us. Climate change and building developments are reducing the available agricultural land year on year, so further reducing it by deliberately covering it with solar

panels rather than on buildings, is clearly insane. This is being done for short term profit with no

thought for the future”.

Christian Heritage - The Mayflower Pilgrims

We are also raising a strong objection to the planning application for the large scale solar project due to our

extremely significant links with The Mayflower Pilgrims.

Sturton Le Steeple is one of the epicentres of the Pilgrim story. The Parish Council have been working directly with

Bassetlaw District Council to enhance tourism for our area by commissioning an important piece of Sculpture the

majority of which has been paid for through Rural England funding.

We are very proud of our Christian Heritage and strong links with the Mayflower Pilgrims.

We are already attracting

tourism. We seek to advance this further by welcoming more visitors, using our focal point of the Sculpture and

Information board, using our village hall facilities to provide refreshments and working directly with Bassetlaw

District Council on promoting Sturton Le Steeple further.

Sturton is part of Bassetlaw’s important Pilgrim Trail. I enclose the links below.

We need to maintain and enhance this area, create a tourist attraction and work alongside Bassetlaw District

Council in promoting our strong heritage. A large scale, inappropriately located solar farm will also become the

focal point of the village rather than a welcoming place for visitors and a celebration of our World Changing

Heritage.

Pilgrims Trail - Pilgrim Roots – Downloadable trail map, also this is the website with all the trails/videos information

about the pilgrims.

Pilgrim Trails - Sturton-Le-Steeple - Pilgrim Roots- This is the trail for Sturton that you can download and listen to on

your phone.

Fields for Farming

Fields For Farming is a local group of residents and supporters whose goal is to ensure that energy

production plans in the area are not undertaken at an unbearable cost to local people, land and

ecosystems. These proposals would completely enclose our village.

The RES proposal to convert 1700 acres of farmland to solar panels, including an area for battery

storage, is just one of many speculative applications for large-scale solar sites along the Trent Valley

in North Nottinghamshire and West Lincolnshire.

Energy production plans in the area are not to be undertaken at an unbearable cost to local people,

land and ecosystems, and our village is not enclosed by a sea of glass (unlike other “farms” which

extend lengthways over fields, this one the proposals would completely enclose our village).

Our area is predominantly rural, characterised by farmland interspersed with small villages and

hamlets. However, it already has as many as four other major nationally important infrastructure

projects being developed (referenced below). That number increases to five if you include the

transmission lines from solar farms on the East side of the Trent, all of which will pass directly

through the parish on route to West Burton. The area simply cannot support the cumulative impact of

industrial development on such a large scale.

We have welcomed the STEP nuclear Ffusion project to our area as the first of its kind, recognising

the national need to research, and hopefully deliver green electricity, there by continuing with energy

production in the Trent Valley.

We have acknowledged the need for the area to play its part in renewable energy production and have

supported a smaller scale solar project on land to the west of the village of Sturton Le Steeple.

We recognise that we live in an energy producing area and understand the green energy transition

away from fossil fuels. But RES's proposals are a step too far. We feel that we have already been

landed with more than our fair share of energy production over all remaining land around our villages

with solar panels, and that's before a further huge acreage of Best and Most Versatile (BMV) agricultural land – is taken over by solar panels, with the associated loss of crops, food

The cumulative impact in this village is huge. They will irreversibly change the nature and community

of a rural area that is already feeling the burden of taking more than its fair share of energy and

infrastructure projects on an industrial scale (including the quarry which is spread underway and will

bring noise, dust and traffic)

Cumulative Impact

Our other major concern is for the cumulative effect of the many other projects that are either already

initiated or approved in the area.

West Burton C, the gas power station, is sited off Gainsborough Road which is the only HGV designated road

into the village.

The STEP FUSION project, which the government has just invested £420 million into, is reached by the same

road. When under construction there will be 10,000 people on site all of whom will need to use this single

access road.

Brown and Mason are decommissioning West Burton Coal Power Station and their work entrance for staff

and lorries removing recyclable material also use this minor road.

□ Associated Industries Quarry, (although consented in the early 2000's), have recently opened up their new

quarry, which will involve removing a large area of farm land to access the sand and gravel, this project is

planned to last for 25 years but we have already been told it will need to be extended. The removal of the

aggregate will produce 1000 lorries a week leaving this site onto the same minor road. That is one lorry

every 3 minutes and we have been told they are hoping to increase this to 2000 lorries per week, one lorry

out every 90 seconds with all the noise, fumes and damage to the road surface this will cause as well as the

difficulty in travelling from here to Gainsborough, for local people, with that density and scale of traffic.

In addition to the above there is the reclamation of power station ash being undertaken from Bole

Ings and the new cable corridor and pylons coming from the offshore windfarm from Hull which are

also planned to come through our village in order to connect to the Grid at the decommissioned High

Marnham Power Station. Finally, the 600mw West Burton Solar Farm, being constructed by Island

Green Power on the other side of the Trent in Lincolnshire, is bringing its cables across the Trent and

again through our countryside to reach the West Burton Grid connection.

With full consideration of all points addressed in this letter, Sturton le Steeple Parish Council strongly

object to the proposal presented within application 24/00509/PREAPP

Achaeology comments

The applicant has presented their initial assessment and outline approach to Cultural Heritage at [Chapter 9](#) of the PEIR. Chapters 6 ([Landscape & Visual Impacts](#)), 7 ([Ecology & Biodiversity](#)) and 8 ([Hydrology, Hydrogeology, Flood Risk & Drainage](#)) also contain elements relevant to potential impacts to cultural heritage.

It is the Council's position that the applicant must provide sufficient desk-based research, non-intrusive survey and intrusive field evaluation to adequately assess the archaeological potential and the developmental impacts of the proposed scheme. This must then feed into an appropriate post-consent Archaeological Mitigation Strategy (AMS) to reduce the impact of the development to a minimum on archaeological remains and other cultural heritage sites.

The scheme runs through areas of known archaeological potential dating from the Neolithic to post-medieval period and all archaeological periods in between are represented on the Nottinghamshire Historic Environment Record (NHER). Of particular note is the late Iron Age and Roman settlement activity recorded throughout north Nottinghamshire. Numerous sites have been identified from a comprehensive programme of aerial photography and more recently through archaeological field work. The site lies either side of a major Roman road between London and York (Margary 28a) which offered an alternative route to the Humber ferry crossing. It deviated from Ermine Street following a route between Little Carlton and Doncaster, and crossed the River Trent at Littleborough (*Segelocum*).

From experience of past schemes, it is certain that currently unknown archaeological sites will also be identified through a robust programme of evaluation and assessment work.

The potential impact to the archaeological resource from development work is considered significant and adverse and will result in total or partial loss when archaeological remains are encountered.

General Comments

The applicant's approach to cultural heritage is so far confined to desk-based research and geophysical survey. We would expect the PEIR to contain a completed desk-based Assessment (DBA) and completed geophysical survey with a solid programme of evaluation trenching either agreed or underway.

Currently the applicant has not completed a DBA which should form the baseline research for the EIA, but a full programme of geophysical survey has been largely completed, with a second phase of work nearing completion (Appendix 9.2). The applicant states in table 9.4 that a trenching plan is in production and will be presented once the geophysical survey has been completed.

While the current progress is somewhat behind expectations, much of the data required for an effective DBA has been summarised in the PEIR and appendices, however we would recommend that this is properly drawn together into a separate archaeological DBA document.

We welcome the extent of geophysical survey undertaken and that this will feed into a programme of pre-examination evaluation trenching.

Evaluation trenching is both an informative and prospection technique and it is essential that the results of the desk-based research and non-intrusive surveys are properly tested with intrusive (trenched) evaluation to ensure that currently unknown sites are identified where the previous assessment techniques have not been successful in doing so.

To this end, the Council recommends that the full order limits should be subject to trial trench evaluation with a minimum 3% coverage where geophysics has been undertaken and 5% coverage where it has not. Any less would be insufficient to properly inform the EIA assessment and for the production of an informed AMS.

Specific Comments on Chapter 9

Section 9.2.8 – The applicant has quoted paragraph 2.10.112 of EN-3, but crucially failed to quote the associated Footnote 94 that states: ***The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions.***

Section 9.3.3 – Data from the Portable Antiquities Scheme (PAS) should also be consulted.

Section 9.5 – Table 9.5: we welcome the removal of *Segelocum* Roman Town from the order limits and also the associated, but not yet designated, area of the town that has been identified through geophysical survey.

Section 9.6.17 – We welcome that the majority of the scheme has been geophysically surveyed and positively contributed to our understanding of the archaeology in the landscape.

Section 9.6.18 – Confining evaluation trenching to targeted areas of archaeological potential identified solely through the desk-based and non-intrusive methodologies (which have known limitations for successfully identifying some archaeological sites within the County), leads to significant confirmation bias in the assessment results. It is essential that evaluation trenching is also used as a prospection technique for sites that do not show up in geophysics results, such as highly sensitive pre-historic features and human remains. It is impossible to design a proportionate mitigation strategy without understanding the archaeological resource

properly and the proposed impacts upon it from the development. Sufficient trenching results from across the site are needed to inform design and mitigation.

Assessment of Likely Significant Effects

Section 9.7.4 – The ‘*most significant areas of archaeological potential*’ will not be known until the evaluation trenching has been completed, however we welcome the recognition of the importance of evaluation trenching.

Section 9.7.5 – We do not accept that cable trenching constitutes ‘low impact’ works. These are highly destructive to archaeological remains and monitoring (watching brief) cannot be agreed as a mitigation measure until the archaeological potential is fully understood. We do not accept the applicant’s assessment of significance or impact in this section.

Sections 9.7.3 to 9.7.8 *Construction Phase* – This section is not well presented and should be reworked to also include all construction effects including piling, ground works for infrastructure, cable trenching across the whole site, plant tracking, environmental works (swales, planting, etc) and any other proposed ground impacts. Suggestions for mitigation are also irrelevant in this section and have been based primarily on the hope that there are no significant assets in areas of impact.

Sections 9.7.9 to 9.7.20 *Operational Phase* - This scheme will require mid-life refits at least once. The removal of old infrastructure and installation of new will have significant ground impacts. This section fails to acknowledge this and further fails to acknowledge that any mitigation measures can only be assessed through appropriate evaluation at this stage. Evaluation during operation will not be possible. The applicant’s assessment of indirect impacts to designated assets is also concerning and we question the blanket ‘not significant’ conclusion in every instance, however I defer to comments from the Conservation Team and Historic England on this.

Sections 9.7.20 to 9.7.24 *Decommissioning Phase* - As above, decommissioning is likely to have significant ground impacts beyond that of construction. The applicant is relying upon appropriate mitigation being undertaken prior to construction to mitigate any potential decommissioning work. This does require appropriate evaluation to be undertaken and an understanding of the decommissioning methodology which has not been detailed here.

Section 9.8 *Mitigation* – The applicant proposes only two types of archaeological mitigation work; avoidance (preservation *in situ*) and ‘no dig’ solutions. While these may be appropriate, they have also failed to include monitoring {watching brief}, a method previously put forward in this document for mitigation. Other techniques such as excavation and strip map and record should also be considered where archaeological sensitivity and development requirements warrant it. An Archaeological Clerk of Works (ACoW) should be

commissioned to oversee the implementation of any mitigation measures which are likely to be complex when combined with construction schedules. No specific mitigation measures can be ruled out at this stage of assessment, and all potential techniques should be detailed in this section of the PEIR in the absence of more specific evaluation data.

Section 9.8.3 – Preservation *in situ* areas will require an ongoing commitment to monitoring during the operational life of the solar farm to ensure compliance and enforcement if necessary.

Section 9.11; Table 9.6 – requires updating to include all potential archaeological mitigation techniques except where areas have been removed from development.

Draft DCO

Archaeology has not been included as a specific requirement. While it may be premature to discuss specific wording until the full extent of the assessment work has been completed, the following wording was recently approved by the Secretary of State for a similar project and could form the basis for further consideration:

(1) The authorised development may not commence until—

(a) a scheme of additional trial trenching has been submitted to and approved by each relevant planning authority, in consultation with Historic England

(b) additional trial trenching has been carried out in accordance with the scheme approved under sub-paragraph (a); and

(c) updates are made to the archaeological mitigation strategy to account for the results of the additional trial trenching carried out, and the updated archaeological mitigation strategy is submitted to and approved in writing by each relevant planning authority, in consultation with Historic England

(2) The authorised development must be implemented in accordance with the updated archaeological mitigation strategy approved under sub-paragraph 1(c), and any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to each relevant planning authority.

Conclusion

The PEIR has presented a limited initial assessment of the archaeological potential and a full DBA should be completed as an independent document for summary in the EIA Chapter.

The evidential baseline of archaeological information is currently limited, but additional work is underway which is welcomed. However, the proposed limitation for evaluation trenching is concerning and the DCO application must include the results of a full programme of trial trench evaluation to properly inform the post-consent AMS.

Trenching results presented at the assessment stage are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays or deliverability issues and excessive cost increases that could otherwise be avoided.

The whole of the 'assessment of likely effects' and 'mitigation' sections (9.7 and 9.8) of the PEIR falls short of expectations. Far more detail is required on the likely specific impacts (piling, infrastructure, panel cable trenching, connection cable trenching, swales, environments offset, etc), and an acknowledgement that mitigation is likely to comprise multiple techniques to achieve a satisfactory outcome. Understanding of the impacts at all stages of the life of this development is key to designing an effective and fit for purpose mitigation strategy.

The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), EN3 and the National Planning Policy Framework.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 clearly state: ***"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 \(2d\)](#))

Mikes comments

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.

The majority of the site remains in the proposal. Conservation would therefore reiterate those comments made previously with regard to the following:

- Impact on wider setting outside of the 3km boundary (including North Leverton Windmill);
- Impact on the setting of those Listed Buildings, Conservation Areas, SAMs and other heritage assets within the affected area and in the vicinity; and
- Impact on the understanding of the Roman Road;
- Views from, to, along and between public rights of way; and
- The impact on topography on views, landscape and setting impact.

10th feb

I just thought it would be prudent to raise a couple of specific examples of sites where careful consideration is

needed:

1. Land South of Station Road and west of Crow Tree Farm – Here there is a public footpath which goes in

a NW to SE direction, which affords views towards 3 prominent local landmarks in the village, all listed,

namely the curtilage-listed former agricultural building range next to Crow Tree Farmhouse (now called

Oak Barn, Crow Tree Barn and Millers Barn), West End Farm (including its curtilage-listed barns), and

the Church of St Peter & St Paul. The open views along this footpath form a key part of the setting of

those Listed 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.

2. Land adjacent Manor Grove, North Leverton – Again 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.

Following the Parish Council meeting held on Tuesday 11th February, the North and South Wheatley Parish Council

voted to unanimously reject this planning application on the following basis:

The huge scale of 1700 acres which will surround Sturton le Steeple and affecting neighbouring villages.

It will remove a very large amount of productive agricultural land used for food production, which it will never get

back.

Wildlife habitat will be adversely affected.

Footpaths will be adversely affected - negatively altering the countryside where residents walk and live -

effectively industrialising a small rural community.

The land under solar farms will not be capable of supporting agriculture or animal grazing and in contrast it is

likely to become very hard affecting its ability to absorb water, which is likely to exacerbate the flooding issue that

Sturton le Steeple and South Wheatley already regularly suffer from and which is only likely to get worse.

The area has already had more than its fair share of infrastructure including power stations and associated

electricity pylons - including the new National Grid Pylons, as well as the development of West Burton for nuclear

fusion. Huge solar farms will affect house prices without increasing the number of job opportunities for residents.

The amount of land put forward for the solar farms appears to be speculative and we have seen no strategic plan

i.e. how much land is actually needed to generate 400MW of solar energy versus the need for land to provide the

UK with food security etc. We have also seen no strategic plan for the rest of the UK and how much acreage is

been proposed for each county.

Overall the plans for such an overwhelmingly large solar farm - swamping local rural communities - are likely to

have a significant impact on the wellbeing and mental health of many residents.

It will decimate farms ending multi-generational farms and putting family members

Landscape and Visual Impacts

VIA have commissioned Amey to provide comments in respect to the potential Landscape and Visual Impacts of the proposed development.

Landscape and Visual Impacts

VIA have commissioned Amey to provide comments in respect to the potential Landscape and Visual Impacts of the proposed development. View our privacy notice at www.nottinghamshire.gov.uk/privacy Nottinghamshire County Council, County Hall, West Bridgford, Nottingham NG2 7QP

General comments and queries on the PEIR are listed in the table below with the document reference, observational comment and any related guidance listed out.

After thoroughly examining the submitted planning documents, it is apparent that considerable effort has been dedicated to compiling a comprehensive set of materials to elucidate and assess the proposed development. However, several aspects require further clarification and verification:

Methodology for ZTV Creation: Our review has raised several queries regarding the methodology employed for creating the Zone of Theoretical Visibility (ZTV). Detailed information on the approach taken and the assumptions made would be beneficial to ensure accuracy and transparency.

Adherence to GLVIA3 Guidance Notes: It is imperative to confirm whether the most recent Guidelines for Landscape and Visual Impact Assessment (GLVIA3) Guidance and clarification notes have been utilised to inform the assessment. Adherence to these guidelines is crucial for maintaining consistency and reliability in the evaluation process.

Photographic Record Pages: There are noted inconsistencies within the photographic record pages provided. A thorough revision to ensure uniformity and accuracy across all visual materials is recommended.

Integration with Other Disciplines: The documents would greatly benefit from illustrating how the landscape considerations integrate with other relevant disciplines such as cultural heritage and ecology. Demonstrating this interdisciplinary approach will enhance the comprehensiveness and robustness of the assessment.

Addressing these points will significantly improve the quality and effectiveness of the planning documents, ensuring they meet the required standards for a thorough and informed review.

DELETE ALL FOLLOWING COMMENTS

In addition to the Sturton Ward Neighbourhood Plan, the application site also falls within the area designated within Clarbough Neighbourhood plan. It should be noted that North Leverton with Hablesthorpe Parish Council's application to designate the Parish for the purposes of producing a neighbourhood plan was approved by Bassetlaw District Council on 8 December 2022. The new designation replaces the previous Sturton Ward

Neighbourhood Area, although the existing Sturton Ward Neighbourhood Plan remains valid until any new neighbourhood plans are produced for the local area.

4.60 of the PIER states that the Project will be maintained and operated in accordance with the following management plans. These documents will be submitted as part of DCO application: Outline Battery Safety Management Plan (OBSMP): this will set out the key fire safety provisions for the BESS proposed to be installed in our Project including measures to reduce fire risk and fire protection measures. The OBSMP will take into account good practices for battery fire detection and prevention, in addition to setting an emergency response plan.

The Fire Authority has been consulted on the proposal and has made the following comments:

The Fire Authority ask that the above Grid Scale Battery Energy Storage System Guidance (produced by the National Fire Chiefs Council [NFCC]) is provided to the developer. It is the content of which and any other relevant standards (e.g. NFPA) that the Fire Authority will seek assurances against. If that guidance is not to be met then detailed expert evidence and or technical data will be requested to justify such deviations.

The Fire Authority notes that within the documentation accessed on line there are several generic statements / observations of 'good intent' made by the developers with regards to the safety considerations for the BESS containers. However without the detail to substantiate these statements the Fire Authority cannot offer any further meaningful comments.

As such the Fire Authority reserve the right to consult further once that detail is known.

Although active fighting is mentioned in the information accessed on line, The Fire Authority is aware that the 'industry' is considering moving from extinguishment for fire incidents involving BESS containers, to 'burn out' and protect. This is based on advice from industry leading experts. The Fire Authority seeks to clarify that the relevant enforcing authority for the protection of the environment (for example Environment Agency / Environmental Health / UK Health Security Agency) should be consulted. The relevance being that if this approach is not approved by that enforcing body, this may influence any subsequent risk management and emergency response plans detailing the requisite safety provisions expected for the site.

Whilst The Fire Authority does recognise burn out as a potential means to resolve an emergency of this type on site, it is not the role of the Fire Authority to authorise it. When the finer detail is provided for the final application and in turn addresses the requirements of the attached guidance above, the Fire Authority can then consult further to the Local Planning Authority.

A Fire Risk Statement relating to the BESS would be submitted as part of the application, and therefore the matter of fire prevention and safety would be covered appropriately outside of the ES.

It is recommended that the formal response of the Council includes the above comments in the full reply to the statutory consultation.

From the PIER it appears that one Battery Energy Storage System (BESS) and substation site is proposed on the east and one is also to be located on the west of the River Trent but at times the document appears to state that one BESS is proposed and this will be located to the west of the Trent. Further clarification is also required on this matter.

The PIER has identified potentially four locations on the west of the River Trent for the BESS and substation compounds (falling within the administrative boundary of Bassetlaw District Council). In section 4.46 of the report it stipulates that these sites will occupy up to 20ha each. The height of the buildings at the BESS site are considered to be a maximum 3.5 metres high. The substation will be 13.5m high. It is recommended that the Environmental statement considers one site on the west of the Trent

The Local Planning Authority requests that the design of the buildings, the impact on the landscape, cultural and buried heritage and that the infrastructure is outside areas of flood zone is fully considered.

Chapter 7 Biodiversity

The Council Lead Ecologist has commented the following:

On-site Habitats

It is recognised that the core of the site is predominantly open and exposed intensively managed arable land. However, this land will at times be fallow, in ley or sown with crops beneficial to wildlife such as those used in agri-environment schemes and these variables allow the otherwise intensive arable land to offer seasonal value to a range of wildlife.

There are also networks of hedges, scrub and tree cover, ponds and, ditches within this landscape that offer value to fauna as standalone features but critically, are likely to provide thoroughfares and links through the landscape to wildlife.

The River Trent corridor bisects the site and is a significant habitat, link through the landscape and likely focal point for a large assemblage of species. Bassetlaw District Council is aware of Open Mosaic Habitat on Previously Developed Land within the boundary of the proposed site, as well as areas dominated by plants listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

Protected Species Numerous protected, red listed and rare species are likely to be recorded during the ongoing surveys of the site and it is expected that comprehensive survey effort will help guide much of the mitigation and compensation for the proposal and ensure success. It is on balance envisaged many species groups could benefit from the proposals.

Protected Sites There is only one statutory protected site within reasonable proximity to the site and at >1000m it is effectively isolated, thus there are unlikely to be any significant effects or considerations. Numerous non-statutory sites are within proximity to the site and providing effective mitigation is employed during the construction and operational phases it is likely these sites will benefit from the absence of farming inputs, connectivity and faunal abundance a well-considered scheme might bring.

Mitigation/Compensation/Biodiversity Net Gain

Whilst National Significant Infrastructure Projects are exempt from the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended))¹, there remains a requirement to deliver a net gain in biodiversity in line with para. 180(d) of the National Planning Policy Framework² and Bassetlaw District Council Local Plan. It is however considered that generating a net gain from the numerical values of floral diversity alone on a project of this size is inadequate. Bassetlaw District Council will be looking for, as indicated in the literature supplied thus far, an holistic approach to compensation whereby existing species are provided with habitat of increased quality, connectivity and in some cases quantity. Existing wildlife thoroughfares that are identified through the ongoing survey work, such as the River Trent for example, must be bolstered and shielded from the potentially negative impacts of solar parks such as the interference with the breeding success of winged aquatic invertebrates, herbicide use and lighting. It is hoped that compensation will be qualitative as well as quantitative and create/install features that might ordinarily be left out of commercial schemes where BNG metric scores are paramount.

Summary

Whilst the core of the site may largely be of low biodiversity value, there are aspects of the site which are of local significance and habitats such as the River Trent which hold regional significance. Undoubtedly ongoing survey work will reveal the assemblages on site and where mitigation and compensation are to be targeted but it is expected this compensation will be befitting of a nationally significant project and not simply aimed at achieving a numerical gain, which, given the habitats currently present, would be simple

Figure 7.2 shows a large area of unsurveyed land within the administrative boundary of Bassetlaw District Council. This large area of land should have a Phase 1 habitat survey conducted to inform the ecology section of the Environmental Statement and assess the biodiversity net gains required as part of the project.

Natural England

Natural England are currently reviewing the Preliminary Environmental Impact Report as part of the section 42 statutory requirement to the developer. As such, Natural England has no comments to make on this application.

Chapter 8: Hydrology and Hydrogeology

Nottinghamshire County Council Lead Local Flood Authority has commented the following:

Due to the nature of the proposals these do not appear to seek to significantly increase the impermeable area of the site, and as such the LLFA would only comment that surface water runoff from the site should be prevented from being increased. Any runoff from any hardstanding/small buildings on the site should be captured on site, to prevent increasing runoff from the site.

Chapter 9 Land, Soil and Groundwater

It is noted that that an Agricultural land Survey within the PIER has been carried out on the main sites but not in areas that are assigned to cable route options. The Local Planning Authority would request that all areas are surveyed in order to assess the soil quality to fully understand how much of the best and most versatile agriculture land would be lost to a project that would occupy the site potentially for over 60 years.

The PIER also identifies that of total land area of 1,263 Hectares has been surveyed to date and the Agricultural land Survey categorise the land the best and most versatile agriculture land to be lost as follows

Grade 1: none present

Grade 2: 19.2% (243 Ha)

Grade 3a: 36.0% (455 Ha)

Grade 3b: 44.8% (565.9 Ha)

Grade 4: none present.

This proposal would develop 698 hectares of grade 2 and grade 3a of the best and most versatile agriculture land for the period of in excess of 60 years.

The Environmental Statement should provide a robust consideration of this matter and all land should be surveyed.

Nottinghamshire County Council Policy Section has been consulted and commented the following:

Minerals and Waste

The adopted Nottinghamshire and Nottingham Replacement Waste Local Plan, Part 1: Waste Core Strategy (adopted 10 December 2013) and the saved, non-replaced policies of the Waste Local Plan (adopted 2002), along with the adopted Nottinghamshire Minerals Local Plan (adopted March 2021), form part of the development plan for the area. As such, relevant policies in these plans need to be considered.

Please note that the Pre-Submission Version (August 2023) of the emerging Waste Local Plan, which has been submitted for examination (March 2024), should also be given weight as a material consideration.

Minerals

As noted in paragraph 9.25 of Chapter 9 of the Preliminary Environmental Report, the site falls within the Mineral Safeguarding and Consultation Area for sand and gravel with the

permitted Girton quarry 350m from the site boundary. Paragraph 9.27 then continues that a Mineral Assessment has not been provided at this time but will be within a future Environmental Statement once further information has been obtained and further engagement with the authorities undertaken.

In relation to a forthcoming mineral assessment, this should address and show compliance with Policy SP7: Minerals safeguarding, consultation areas and associated minerals infrastructure in the Minerals Local Plan and National Policy. Policy SP7 requires developments within the minerals safeguarding area to demonstrate it will not needlessly sterilise minerals nor hinder future extraction and where this cannot be demonstrated, and there is a clear need for non-mineral development, prior extraction will be sought where practical. The Council would welcome further engagement and would also encourage the applicant to engage with Tarmac, the operator of Girton quarry, to ensure this permitted site is safeguarded.

Waste

To reflect the Inspectors comments to the Scoping Consultation in relation to waste, the applicant has stated within Chapter 4 of the Preliminary Environmental Report that the future Environmental Statement will detail the likely estimates, types and quantities of waste generated during the construction phase. Reduction measures for waste will also be detailed.

The Councils would welcome a waste assessment which provides a forecast of expected waste arisings but believes this should cover the construction, operational and decommissioning phases. Any arising figures should then be considered against Nottinghamshire and Lincolnshire's capacity forecasts set out in the authority's Waste Needs Assessment. Since this proposed development is one of many large solar farm developments in the area, all with a similar timescale, any waste assessment should also consider the cumulative impact of this proposal with other developments on waste capacity in Nottinghamshire and Lincolnshire.

Chapter 10 Buried Heritage

Nottinghamshire and Lincolnshire County Council have produced a joint response and highlighted concerns relation to the consideration to the buried heritage within and around the application site. Their full comments have been attached as an appendix to this report and they have concluded the following:

The PEIR has presented limited baseline information to date. Some archaeological assessment work is underway which is welcomed, however there are concerns that the

proposed programme seems to fall short of providing the necessary data to inform an appropriate archaeological mitigation strategy for the DCO application.

EIA will require the full suite of comprehensive desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact area. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

This is also set out in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states ***"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 \(2d\)](#))

Chapter 11 – Cultural Heritage

Bassetlaw District Council's Conservation Officer provided the following comments prior to the masterplan being updated

In relation to the area in Bassetlaw, there are a range of heritage assets within close proximity to the site. These are correctly identified in the 'Cultural Heritage Methodology' document discussed during the meeting yesterday.

The land is primarily low-lying and flat, being part of the wider Trent Valley area. There are a small number of higher points.

At this early stage of the process, there isn't a proposed layout for panels and other infrastructure. However, I thought it prudent to set out some general comments in relation to likely heritage and setting impact based on the red line plan:

The impact on the setting of the Whimpton Moor Scheduled Ancient Monument is of concern. The land around the monument contributes much to its rural and open countryside setting. Development of a solar farm in that area would drastically alter that setting. This would only be exacerbated by the presence of elevated ground to the west, south west and south of the monument. It is suggested that development be restricted in that part of the red line area.

Land to the west of St Oswald's Church in Ragnall is primarily open and the church is visible for a considerable distance. In addition, Ragnall Hall's former parkland, a key part of its setting and identified as an unregistered park and garden, extends into that area. A full assessment would need to be undertaken with regard to the likely impact on these assets.

The setting of St Gregory's Church and Manor House in Fledborough is similarly of open countryside, with long views of the flat farmland in all directions. Development to the west, north and south west of the village would irrevocably harm that setting and would therefore be resisted.

Several heritage assets alongside both sides of the river are particularly sensitive to development of this nature. This will need to be addressed in future stages of this NSIP process.

More detailed and site-specific comments will be made once a proposed layout has been provided.

Chapter 12 Landscape and Visual Amenity

The study area will be kept under review as the project develops and will be the subject of ongoing consultation with Landscape Officers of Lincolnshire County Council, Nottinghamshire County Council, Bassetlaw District Council, Newark and Sherwood District Council and West Lindsey District Council (collectively referred to as the 'host authorities') until the preparation of the version of the Environmental Statement for submission.

Cumulative Landscape and visual effects with other schemes should be assessed as the project progresses, particularly in regards other NSIP or renewable energy projects. The visual assessment should take account of the worst case scenario in terms of winter views and effects associated with landscape mitigation at the operational phase (year 1), residual phase with planting having established (typically 15 years) and at the decommissioning phase.

The LVIA should ensure that all elements associated with the development are considered and assessed, such as battery storage systems and boundary fencing, which may be more visible than the panels due to height and mass.

The developer is encouraged to assess the cumulative impact on the landscape of this proposal and all other proposal with planning permission. In particular the concentration of development proposed at High Marnham including the Hydrogen Production Plant and the proposed 400kv substation.

Chapter 13. Transport & Access

We are not in receipt of the full County Council's Highway Authority comments on the revised PIER

Nottinghamshire County Council Highway Authority:

Provided comments prior to the revised master plan and are summarised as follows:

A proposal of this magnitude will have significant impact on the existing transportation network mainly during the project's construction phase. Therefore, the HA will require a detailed Transport Assessment (TA) and supporting studies to assess the additional traffic demands and any required mitigation to the highway network. These should be prepared in accordance with current Planning Practice Policy, Nottinghamshire County Council's Design Guide and other industry accepted guidance on TA's. The HA will need to consider the detail of the transportation impacts once the planning application (s) is/(are) made and is likely to secure any necessary mitigation measures through planning condition and S106 obligations

A proposal of this magnitude will have significant impact on the existing transportation network mainly during the project's construction phase. Therefore, the HA will require a detailed Transport Assessment (TA) and supporting studies to assess the additional traffic demands and any required mitigation to the highway network. These should be prepared in accordance with current Planning Practice Policy, Nottinghamshire County Council's Design Guide and other industry accepted guidance on TA's.

The HA will need to consider the detail of the transportation impacts once the planning application (s) is/(are) made and is likely to secure any necessary mitigation measures through planning condition and S106 obligations.

The TA should include the following details and information:

- 1. The access strategy outlining design philosophy and the approach for the scale of development proposed using <https://www.nottinghamshire.gov.uk/transport/roads/highway-design-guide>
2. Note - baseline appraisal data, key analysis parameters and assessment methodology should be agreed with the HA before the full TA work is undertaken.
3. The TA should clearly define the proposed schemes in relation to the different LPA administrative boundaries i.e., Bassetlaw, Lincolnshire, and Newark & Sherwood.
4. The number, size and frequency of the vehicles that will be associated with the construction and completed – operational phases of the proposal.

5. The proposed routing of the construction vehicles from the principal highway network to the proposed sites, including vehicle tracking where necessary to show that the highway network can adequately accommodate construction vehicles access, egress and turning. This will require a Construction Traffic Management Plan (TMP) to be agreed with the HA. Contacts tro@viaem.co.uk abnormalloads@viaem.co.uk

6. Details of the proposed temporary/permanent access(s)/hardstanding in the site, including achievable visibility splays, access widths, finished gradients, surfacing materials and drainage measures. The layout plan(s) should show the proposed access and its interface with the existing public highway network. This must be a topographical plan, accurately showing all street furniture/posts/trees/assets at a minimum scale of 1:500. Access arrangements and proposed highway improvements will require independent Stage I Road Safety Audit (RSA) to be undertaken in accordance with HD 19/15.

7. Details of the proposed welfare compounds/parking/unloading/manoeuvring areas within the site during both the construction and operational phases by use of a comprehensive Construction Management Plan (CMP).

8. All temporary construction sites (expected to be mostly agricultural field) should include proactive measures to prevent deleterious construction material and mud being transferred to the public highway i.e., Wheel wash facilities.

9. The reports should include detailed long-term management strategies to mitigate any negative transport impacts of the development and where possible promote sustainable active movement.

10. The TA should include a chapter that deals with cable routing corridors and utility diversion/installation over/under the public highway for the National Grid connection. Especially, how the main connection of the solar power system will be established at High Marnham substation. The opportunity to share cabling infrastructure with the other solar panel schemes/utilities in the area should be explored.

11. All new cables in public highway need to be installed by a statutory undertaker and use of a Section 50 licence under the NRSW Act for installation by other companies is not acceptable. Contact licences@viaem.co.uk streetworks@viaem.co.uk

12. Some sensitive rural roads will require dilapidation surveys and road condition prior to and after heavy construction work has been undertaken.

13. The proposal must identify any minor public highways affected and their future treatment. This should include definitive/non-definitive rights of way such as public footpaths, public road, bridleway, BOAT or restricted bye way. Contact countryside.access@nottscc.gov.uk.

14. The area appears to contain a limited number of environmental weight limits, but the HA encourages early consultation to limited environmental annoyance to affected villages/residents and to ensure works programmes are not hindered. Contacts

15. Enquiries about adopted public highway records highwaysearches@viaem.co.uk Please note this list is not exhaustive and the applicant will be expected to provide appropriate assessment information that reflects site conditions and its locality.

Furthermore, the HA reserves its right to vary its assessment requirements and the amount of detail required depending on the outcomes of the iterative transport evaluation process.

The Highway Authority officer has been consulted on the amended masterplan and PIER and has commented the following:

The Local Highway Authority is considering the suitability of the suggested primary access points on the highway networks and their comments will be incorporated into the response submitted by Nottinghamshire County Council.

It is considered relevant that the cumulative impact of this proposal and all other proposal with planning permission within the development area. In particular the concentration of development proposed at High Marnham including the Hydrogen Production Plant and the proposed 400kv substation should be included in this assessment.

Chapter 15: Climate Change

National Grid has commented the following:

National Grid Electricity Transmission (NGET) preference is for no panels to be positioned underneath our conductors. There looks to be multiple areas where panels are planned underneath our overhead lines

Require a minimum of a 15m stand off around our towers and advise any conductive materials within 30m of a tower are adequately earthed.

The developer must have a valid connection agreement with us and use the use of NGET land process to agree a cable easement on NGET land.

The necessary safe clearances from our conductors must be maintained at all times. We can assist with profile clearance drawings and guidance for this.

Any existing National Grid easements must be acknowledged and not conflicted with unless agreed to by NGET.

It is recommended that consideration should be given to the impact of waste generated from the construction /decommissioning phase and or end of life solar arrays requiring replacement in terms of how and where it is disposed of and transportation away from the site. There are other solar schemes in the area that are operating on similar time scales therefore there is the potential for significant amounts of waste if this is not carefully considered.

Chapter 16: Noise and Vibration

The District Council's Environmental Health Officer has commented the following:

Noise

The main sources of noise likely to arise from this proposed site are from the electrical transformers, inverters, other substation equipment and battery storage equipment. Noise is anticipated as being noticeable within 300m; the updated design has therefore incorporated this with noise generating plant and equipment located at this distance as a minimum from the nearest residential receptors. Otherwise, once operational noise is unlikely to be of issue as there are expected to only be a small team of workers and engineers to provide maintenance for the site. However, before any decision to approve or refuse the application is made, it is recommended that the applicant be required to provide a report from a specialist noise consultant or suitably qualified person, to assess the impact of this additional noise source on nearby residential properties. The report shall be conducted in accordance with BS 4142:2014+A1:2019 and shall be submitted to the Local Planning Authority for assessment.

There is likely to be some impact from noise during the construction phase, including both noise and potential vibration effects, though this will be temporary; the construction phase is anticipated to last 2 years. The potential effects should be detailed within the Environmental Statement. In order to limit the likely impact from noise, I would suggest that a condition is

applied that construction work and ancillary operations which are audible at the site boundary, including deliveries to and removal of plant, equipment, machinery and waste from the site shall be carried out only between the following hours: 08 00 Hours and 18 00 Hours on Mondays to Fridays and 08 00 and 13 00 Hours on Saturdays and; at no time on Sundays and Bank Holidays. A Construction Traffic Management Plan should also be submitted and adhered with to limit the effects from construction and decommissioning traffic noise and vibration.

Additionally, effective steps should be taken by the operator to prevent the deposition of mud, dust and other materials on the adjoining public highway caused by vehicles visiting and leaving the site. Any accidental deposition of dust, slurry, mud or any other material from the site, on the public highway shall be removed immediately by the developer

Lighting

Once completed, there are likely to be relatively few light sources associated with this proposed scheme. There may be the need for permanent lighting to the battery storage, inverter and transformer compounds. However, there may be a need for significant lighting during the construction phase both at locations where installation is taking place (in the winter) and at fixed construction compounds. In order to ensure that such lighting does not cause nuisance, I would suggest a condition that all artificial lighting for the site both temporary and permanent shall be of such a design and installed and sited/ angled in such a manner as to prevent glare or light shining directly into neighbouring dwellings and that details of necessary lighting are submitted to the planning authority.

Contaminated Land

EIA should include reference to land contamination. Preferably sources of historic land contamination and methods of reducing future land contamination.

Chapter 18: Socio-Economics

This chapter considered socio-economics during the construction, operation and decommissioning phases. These include significant positive effects on employment, both short-term during construction and long-term during operation, as a result of direct and indirect job creation. Additionally, there are likely significant positive effects on Public Rights of Way during operation, as a result of enhancements and new permissive routes

The PIER acknowledges that there are several PRowS which pass through or are close to our Site, along with Route 647 of the National Cycle network (the Sustrans route). A usage

survey of some of the existing PRoWs was carried out as part of the baseline. Therefore usage surveys should be conducted to assess the impact of the development.

For the consideration of Employment and investment, there will be temporary Employment for Construction and small numbers of Employment at operational stage. Projects such as this may result in employment through specialised subcontractors however the employment of local people who do not increase journeys to the site and rely on temporary accommodation should be secured wherever possible. It is welcomed that a detailed assessment of the significance of effects will be presented in the ES.

Chapter 20: Conclusions of Preliminary Significance

The approach to assess the likely significant effects of the project appear reasonable. However in some cases for topics such as Landscape and Visual Impacts there is a substantial gap on assessing the impacts between the period of time of year 1 and year 15 of operational development. This should be more assessed more frequently.

The following consultees have been consulted but no comments have been received

Nottinghamshire Wildlife trust – No comments received

Normanton on Trent Parish Council - No comments received.

Marnham Parish Council - No comments received.

Tuxford Parish Council - No comments received.

Dunham on Trent Parish Council - No comments received.

Fledborough Parish Council - No comments received.

Ragnall Parish Council - No comments received.

Darlton Parish Council - No comments received.

Other matters

The PINS scoping opinion was issued on the basis that the operational life span of the scheme would be 40 years and the PIER is now exploring an operational life span of 60 years this should be clarified and explored within the Environmental Statement. For likely significant effects to be considered in the ES it should provide an assessment over the anticipated life of the development, as far as reasonably possible, so that the full impact of the development can be understood.

Construction working hours will be 7.00 - 19.00 hours Monday to Saturday with allowance for occasional, overnight working where operations cannot be paused, for example completion of the Horizontal Directional Drilling (HDD). This may have an adverse impact on the residential amenity and access to neighbouring properties and will need to be considered.

Glint and Glare has not been considered under Landscape and Visual Impact and it is recommended that this is considered along with glint and glare on the users of PROW and the highway and this should be used to inform other relevant sections of the ES.

The Local Authority raises concerns that the PIER uses the "Rochdale Envelope" assessment approach and therefore allows 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 at preapplication stage.