



Katie Shoosmith

Email address: [Katie.Shoosmith@nationalgrid.com](mailto:Katie.Shoosmith@nationalgrid.com)

Our reference: 25/00214/PREAPP

Please ask for: Amanda Broadhead

Email Address:

[amanda.broadhead@bassetlaw.gov.uk](mailto:amanda.broadhead@bassetlaw.gov.uk)

14<sup>th</sup> April 2025

Dear Katie

### **Section 42 of the Planning Act 2008: Duty to Consult on a Proposed Application**

Proposal: Proposal to reinforce the 400kV high voltage power network between North Humber and High Marnham (Electric Lines) for National Grid Electricity Transmission

Location: Part of the proposal falls within the administrative area of Bassetlaw

The Statutory pre-application consultation is to run from 18 February 2025 to 15 April 2025. National Grid has conducted a briefing with elected Members on. A briefing report has also been taken to Planning Committee on 3<sup>rd</sup> April 2025 and noted by Members of the Planning committee.

Bassetlaw District Council is a consultee in the NSIP process. Therefore the Local Planning Authority has consulted their normal consultees on the submitted PIER report and Bassetlaw District Council will provide comments for the expected detail and considerations in the Environmental Statement. A summary of responses of consultees and additional Officer comments is included for consideration as follows:

Paragraph 2.4 of the PEIR identifies the relevant local plans for the project. The Bassetlaw Local Plan is correctly referenced. However, the district's development plan also includes a number of neighbourhood plans, many of which cover the project corridor. We would request that these are also referenced in 2.4. A full list of neighbourhood plans is available on the Council's website [All neighbourhood plans | Bassetlaw District Council](#)

Throughout the PEIR reference is made to various neighbourhood plans but not the Sturton Ward Neighbourhood Plan. Given that the corridor crosses the middle of the neighbourhood area this seems to be an omission.

Paragraphs 8.2.31 and 9.2.14 sets out the local policies that the PEIR has had regard to. We request that Bassetlaw Local Plan Policy ST38: Biodiversity and Geodiversity is included.

Paragraph 18.2.14 lists the local policies the PEIR has had regard to relating to Health and Well-Being. 18.2.14 refers to policies within the Bassetlaw Core Strategy and the Bassetlaw Local Plan Main Modifications. Both have been superseded by the Bassetlaw Local Plan. We ask that the relevant policies from the Local Plan replace those identified.

Similarly, 18.2.14 lists policies from the Misterton Neighbourhood Plan and its review and the Treswell and Cottam Neighbourhood Plan and the subsequent submission draft. We request that 18.2.14 only refers to policies in the Misterton Neighbourhood Plan review and the Treswell with Cottam Neighbourhood Plan review.

Paragraph 19.2.14 refers to the Sustainability Appraisal of the Bassetlaw Local Plan. We suggest this should be the Main Modifications, August 2023 not the Publication Version Second Addendum, May 2022.

## Chapter 6 Landscape

Via East Midlands has provided comments for Nottinghamshire County Council and Bassetlaw District Council. Their comments acknowledge that there is an overlap in the PEIR for the following chapters, Chapter 4 – Description of the project, Chapter 6 – Landscape, Chapter 7 – Visual, Volume 4 – Photomontages, Chapter 20 – Substations and associated works, Chapter 21 – Cumulative effects S.42 consultation plan series. A copy of Via East Midlands comments have been attached to this letter.

## Chapter 8 Ecology and Chapter 9 Ornithology

Bassetlaw District Council's Lead Ecologist has commented the following

### ***On-site Habitats***

*Significant consideration has already been given to the proposed route and this appears to have ensured that high distinctiveness and other particularly notable habitats have been avoided. Where habitats are to be lost, it is expected these will be compensated using the principles of Biodiversity Net Gain as is suggested in the existing literature surrounding the project.*

### ***Protected Species***

*As detailed in the Preliminary Environmental Information Report (PEIR), a variety of taxa have been recorded as present/potentially present within the site. It is stated that staff will be trained on basic ecological mitigation, but it is expected that more broadly timing of works in certain areas will be given consideration and works will follow a robust Construction Environmental Management Plan, with Ecological Clerks of Works on hand throughout the project.*

*Whilst the PEIR mentions some data is still being gathered, it is hoped mitigation for the operational phase such as line marking will be used wherever possible to reduce the risk of bird collisions.*

### ***Protected Sites***

*It is expected the application will make a full assessment of the proposals potential to impact upon protected sites although it is clear the chosen route avoids direct land take, there may be indirect impacts and impacts upon functionally linked land.*

### **Biodiversity Net Gain**

*Nationally 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))<sup>1</sup> until November 2025, although many are still including it in proposals.*

*The applicants have indicated in the preliminary information they intend to achieve a Biodiversity Net Gain with the proposals. Bassetlaw District Council would appreciate as much information as is available at the application pertaining to BNG to allow input into the proposals.*

### **Summary**

*Bassetlaw District Council have no objections to the proposed route or associated works highlighted thus far in relation to ecology and this NSIP. The ecological works and considerations appear to be comprehensive and there is an expectation that the mitigation and compensation will continue in this vein.*

Bassetlaw District Council's Tree Officer has commented the following

*At this stage the maps provided can only provide a rough indication of where the proposed route is going to be. From what I can see there is no direct conflict with trees in Conservation Areas or subject to Tree Preservation Orders.*

*All trees are a material consideration throughout the planning process, therefore, I would expect greater details to be supplied at the full application stage in the form of an Arboricultural Impact Assessment and subsequently an Arboricultural Method Statement for areas where impact to trees may be unavoidable*

### **Chapter 10 – Cultural Heritage**

The District Council's Conservation Team has been consulted on the proposal. A full copy of their comments is appended to the report and these can be summarised as follows:

The District Conservation Officer lists that the proposed villages are distanced away from the development

Misterton [approx. 0.8km away from development area]

Gringley on the Hill [approx. 0.5km away from development area]

North/South Wheatley [approx. 1.1km away from development area]

Sturton-le-Steeple [approx. 0.2km away from development area]

North Leverton Windmill [approx. 1.3m away from development area]

South Leverton [approx. 0.5km away from development area]

Treswell [approx. 0.7km away from development area]

East Drayton [approx. 0.5km away from development area]

Darlington [approx. 0.3km away from development area]

The settlements listed above contain a varied range of designated heritage assets, conservation areas and a range of buildings which are regarded as non-designated heritage assets. The development of the proposed electricity transmission line within the immediate proximity of the villages will undoubtedly impose some degree of impact upon the setting of the heritage assets contained within the village. The extent of this impact is presently unknown, but is likely to be considerable and in some instances, severe. In order to make an informed assessment of the scheme's impact, Conservation would require further information at the full application phase, such as a comprehensive landscape impact assessment.

Archaeology comments will be made by Nottinghamshire County Council on behalf of Bassetlaw District Council.

Chapter 12

Chapter 6 Landscape

Via East Midlands has provided comments for Nottinghamshire County Council and Bassetlaw District Council. Their comments acknowledge that there is an overlap in the PEIR for the following chapters, Chapter 4 – Description of the project, Chapter 6 – Landscape, Chapter 7 – Visual, Volume 4 – Photomontages, Chapter 20 – Substations and associated works, Chapter 21 – Cumulative effects S.42 consultation plan series. A copy of Via East Midlands comments have been attached to this letter.

Chapter 8 Ecology and Chapter 9 Ornithology

Bassetlaw District Council's Lead Ecologist has commented the following

#### ***On-site Habitats***

*Significant consideration has already been given to the proposed route and this appears to have ensured that high distinctiveness and other particularly notable habitats have been avoided. Where habitats are to be lost, it is expected these will be compensated using the principles of Biodiversity Net Gain as is suggested in the existing literature surrounding the project.*

#### ***Protected Species***

*As detailed in the Preliminary Environmental Information Report (PEIR), a variety of taxa have been recorded as present/potentially present within the site. It is stated that staff will be trained on basic ecological mitigation, but it is expected that more broadly timing of works in certain areas will be given consideration and works will follow a robust Construction Environmental Management Plan, with Ecological Clerks of Works on hand throughout the project.*

*Whilst the PEIR mentions some data is still being gathered, it is hoped mitigation for the operational phase such as line marking will be used wherever possible to reduce the risk of bird collisions.*

#### ***Protected Sites***

*It is expected the application will make a full assessment of the proposals potential to impact upon protected sites although it is clear the chosen route avoids direct land take, there may be indirect impacts and impacts upon functionally linked land.*

#### ***Biodiversity Net Gain***

*Nationally 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))<sup>1</sup> until November 2025, although many are still including it in proposals.*

*The applicants have indicated in the preliminary information they intend to achieve a Biodiversity Net Gain with the proposals. Bassetlaw District Council would appreciate as much information as is available at the application pertaining to BNG to allow input into the proposals.*

### **Summary**

*Bassetlaw District Council have no objections to the proposed route or associated works highlighted thus far in relation to ecology and this NSIP. The ecological works and considerations appear to be comprehensive and there is an expectation that the mitigation and compensation will continue in this vein.*

Bassetlaw District Council's Tree Officer has commented the following

*At this stage the maps provided can only provide a rough indication of where the proposed route is going to be. From what I can see there is no direct conflict with trees in Conservation Areas or subject to Tree Preservation Orders.*

*All trees are a material consideration throughout the planning process, therefore, I would expect greater details to be supplied at the full application stage in the form of an Arboricultural Impact Assessment and subsequently an Arboricultural Method Statement for areas where impact to trees may be unavoidable.*

### *Chapter 10 Cultural Heritage*

**The District Council's Conservation Team** has been consulted on the proposal. A full copy of their comments is appended to the report and these can be summarised as follows:

*The District Conservation Officer lists that the proposed villages are distanced away from the development*

*Misterton [approx. 0.8km away from development area]*

*Gringley on the Hill [approx. 0.5km away from development area]*

*North/South Wheatley [approx. 1.1km away from development area]*

*Sturton-le-Steeple [approx. 0.2km away from development area]*

*North Leverton Windmill [approx. 1.3m away from development area]*

*South Leverton [approx. 0.5km away from development area]*

*Treswell [approx. 0.7km away from development area]*

*East Drayton [approx. 0.5km away from development area]*

*Darlton [approx. 0.3km away from development area]*

*The settlements listed above contain a varied range of designated heritage assets, conservation areas and a range of buildings which are regarded as non-designated heritage assets. The development of the proposed electricity transmission line within the immediate proximity of the villages will undoubtedly impose some degree of impact upon the setting of the heritage assets contained within the village. The extent of this impact is presently unknown, but is likely to be considerable and in some instances, severe. In order to make an*

*informed assessment of the scheme's impact, Conservation would require further information at the full application phase, such as a comprehensive landscape impact assessment.*

## Chapter 13 Agriculture and Soils

It is noted that that an Agricultural land Survey within the PIER has not been carried out. It is also acknowledged that the whole scheme would see the permanent removal of 92.61 ha, of which 99.9 percent is considered likely to comprise BMV land, would have a significant adverse effect in relation to the permanent removal of BMV land from agricultural use.

It is noted that the provisional Agricultural land Classification (ALC) mapping shows that the study area comprises extensive areas of Best and Mose Versatile land such as Grade 2 land, as well as some Grade 1 land within the draft Order Limits between Route Sections 1 and 8. South of the Chesterfield Canal (Route Sections 9, 10, and 11) the land is predominately mapped as Grade 3 land. However further soil surveys have not established if this is grade 3a of the best and most versatile agriculture land. The Environmental Statement should provide a robust consideration of this matter and all land should be surveyed and the cumulative impact of the loss of Best and Most Versatile land agricultural land within Bassetlaw considered.

Natural England has indicated that it responds directly to the developer as a statutory consultee

## Chapter 14 – Traffic and Transport

For the purposes of presenting to Members we were not in receipt of the full County Council's Highway Authority comments on the revised PIER. These comments will be provided by Nottinghamshire County Council.

## Chapter 15 Air Quality and Noise and Vibration

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

Noise

*The potential effects of the proposal on noise and vibration include potential noise and vibration impacts from construction activities, increased road traffic and vibration during the construction phase, in addition to noise and vibration predicted from the operational phase and general maintenance.*

*The Preliminary Environmental Information Report (PEIR) submitted identifies and assesses these effects, and concludes that with the implementation of mitigation measures, impacts on the NSRs identified within the study area are predicted to be not significant. The assessment was based on the worst-case scenarios, so it is likely that any actual impact will be less.*

*The proposed embedded measures, and control and management measures (including BPM) should be incorporated into the finalised Code of Construction Practice (CoCP) and Environmental Statement when submitted, with any updates and any additional mitigation measures if identified as the planning/design phase develops.*

*The PEIR makes mention to a further detailed assessment of construction noise and vibration and operational noise effects, the Environmental Health Department will review this information when the Environmental Statement is submitted and may recommend certain working hours for certain construction activities accordingly.*

*A Construction Dust Methodology and Assessment has also been submitted to support the proposal; with the implementation of mitigation measures identified, the effect from dust generating activities during the construction phase is predicted to be not significant. These mitigation measures (including BPM) should be incorporated into the finalised Code of Construction Practice when submitted.*

*Additionally, ensure effective steps are incorporated into the CoCP for the construction phase to prevent and manage the deposition of mud, dust and other materials on the adjoining public highway caused by associated vehicles. 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.*

#### **Contaminated Land**

*The route 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.*

#### **Chapter 17 Socio-economics, recreation and tourism**

Chapter 17 deals with the population and deprivation, employment and economic activity, community facilities, businesses, recreation and tourism assets, recreational routes and public rights of way (PRoW), recreational land and open space. A consultation response considering public rights of way will be included in Nottinghamshire County Council's response.

The PEIR considers the impact of the impact of the proposal on a number of community facilities, businesses, recreation and tourism assets and mitigation measures.

The Employment and Skills Manager within Growth & Economic Prosperity at Bassetlaw District Council has provided comments on the scheme and these are attached to the consultation response. These comments recommend to optimise opportunities the following should be considered:

- Local Hiring Strategy: Establish local recruitment targets and structured workforce development programs.
- Skills Development Framework: Partner with local education providers to deliver accredited training aligned with project needs while building trainer competence.
- CITB Client-Based Approach: Require contractors to integrate training commitments into project delivery.
- Supply Chain Engagement: Introduce procurement requirements that prioritise local SMEs and businesses.
- Employment Displacement Mitigation: Develop targeted transition programs for affected workers in impacted sectors.
- Labour Market Planning: Implement workforce forecasting to ensure local skills match future project demands.

## Proposed High Marnham Substation

It is noted that a future planning application will consider the High Marnham Substation. There is a further 400 KV substation within a currently pending planning application site to support a proposed battery energy storage system and Associated Infrastructure and Works. Details can be viewed under planning reference 24/01138/FUL.

The PEIR does not make reference made to planning reference 23/00748/HAZ for an Application for Hazardous Substances Consent for the proposed storage of a maximum of 4.9 tonnes of Hydrogen at Land At The Former High Marnham Power Station Fledborough Road

High Marnham this was granted hazardous substance consent on 17<sup>th</sup> February 2025 and as such contains a Health and Safety consultation zone that may impact the proposal.

All planning applications are available on the Council's web site by following the link below:

[Comment, track and view current applications | Bassetlaw District Council](#)

For further advice please submit a pre-application enquiry into the council

[Pre-Application Advice | Bassetlaw District Council](#)

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

The Fire Authority have passed previous comments on this project albeit with a representative of the National Grid on 05/06/23. Clarity was required over the inclusion of Battery Energy Storage Systems (BESS) and any buildings that may be constructed.

Assurance has been provided that there were neither and this was purely the provision of over land high voltage cables. The Fire Authority understands that this remains the same and as such has no specific comments to make at this stage.

**The Coal Authority** has raised no objection after reviewing the site location plan and has conformed that the site falls within the Coal Authority's defined development low risk area.

In addition to the above comments the Council has received responses from the following Parish Council and these comments are as follows

**East Drayton Parish Council** has commented the following

These comments are in relation to Route Section 10 - A620 east of North Wheatley to Fledborough.

Regarding the section of route through East Drayton Parish, pylons 4AF239 to 4AF242.

This section of the route is along the high point between Church Lane Farm and Mill House. The Parish Council request that the route be moved slightly west to between Field Farm and Mill House or preferably to the west of Field Farm. This section of land is lower and would reduce the visible impact of the pylons on the conservation village of East Drayton.

It would impact on fewer residents especially when it is considered that in wet or damp weather the cables "sing". This would have a detrimental effect on the mental health of residents and walkers in the vicinity. It must also be considered that the noise from the cables would cause distress to horses in livery at the farms on this route. This could result in horses being removed from these liverys with a resulting financial impact on those businesses.

The Parish Council requests that this request for a slight route alteration be taken extremely seriously in light of the points raised.

**Beckingham-Cum-Saundby Parish Council** has responded that they have no objections to the route proposed.

**South Leverton Parish Council** has formally objected to the proposed routing of pylons through the open land that separates their village from Retford, as detailed in the document library.

The Parish Council responds as follows:

*1. Environmental Impact:*

*The proposed route would have a significant adverse impact on the local ecosystem. The installation of pylons and associated infrastructure risks disrupting local wildlife habitats, altering drainage patterns, and degrading the natural landscape. Such environmental degradation could have longterm consequences for both flora and fauna in the region.*

*2. Visual Amenity and Landscape Character:*

*The open land between South Leverton and Retford is a valued community asset, contributing to the visual and recreational appeal of the area. The presence of pylons would not only mar the scenic beauty of this rural landscape but could also adversely affect tourism and local community wellbeing. The degradation of landscape character is a material consideration that should not be overlooked.*

*3. Property Values and Community Well-being:*

*It is well documented that the proximity to large-scale infrastructure, such as high-voltage pylons, can lead to a reduction in property values. This potential devaluation poses a significant concern for local residents and property owners, undermining the economic stability of our community. Additionally, the psychological impact of such intrusive structures on the local populace should be factored into any planning considerations.*

*4. Alternative Routes and Mitigation Measures:*

*We believe that alternative routes, or the implementation of robust mitigation measures, should be seriously explored to reduce the adverse impacts identified above. We urge National Grid to consider these alternatives, including the possibility of rerouting through less sensitive areas or adopting design modifications that could lessen the environmental and visual impact. Given these material considerations, we respectfully request that the planning authority reconsider the proposed route and engage in further consultation with local stakeholders. We are prepared to provide additional evidence and participate in discussions to explore viable alternatives that protect our community's environmental and economic interests.*

*Conclusion*

The approach to assess the likely significant effects of the project appear reasonable. However in some topic there has not been a through assessment of the proposals impacts for instance the PEIR lacks an through evidence base for the proposals loss of best and most versatile agricultural land. However this will be refined as evidence is gathered to inform the Environmental Statement.



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 online, 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 zones 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))<sup>1</sup>, there remains a requirement to deliver a net gain in biodiversity in line with para. 180(d) of the National Planning Policy Framework<sup>2</sup> 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 within 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:

### 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 to this letter 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 proposals with planning permission. In particular the concentration of development proposed at High Marnham including the Hydrogen Production Plant and the proposed 400kv substation.

Comments by Via East Midlands were shared with Bassetlaw District Council on 12<sup>th</sup> July 2024. A full copy of these comments are attached and will be incorporated into the full response submitted by Nottinghamshire County Council.

## **Chapter 13. Transport & Access**

For the purposes of presenting to Members we were 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](mailto:tro@viaem.co.uk) [abnormalloads@viaem.co.uk](mailto: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](mailto:licences@viaem.co.uk) [streetworks@viaem.co.uk](mailto: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@nottsc.gov.uk](mailto:countryside.access@nottsc.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](mailto: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.

Since reporting the above comments to Planning Committee on 17<sup>th</sup> July, 2024, the Council are in receipt of comments from the Highway Authority dated 19<sup>th</sup> July. These comments are attached to this consultation and will be incorporated into the full response submitted by Nottinghamshire County Council.

## **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.

The Council would also like the following observations to be considered:

- Job numbers during and post construction – based on broad assumptions
- Further information required on direct and indirect jobs
- The long-term jobs figure was a low figure when the presentation was delivered – more detail on this
- Identifies construction employment and demand for accommodation – how many construction workers do they anticipate will work on the site during development and what proportion do they anticipate will be from the travel to work area.
- Further consideration for supply chain opportunities
- Claimant count data in Bassetlaw did spike temporarily in the autumn of 2023 due to the Wilko HQ and Distribution Centre closing – reflected in the graphs – reflected in season trend graph too
- Pg 31. Employment opportunities available to local people during construction and operational period due to skills needs – it would be good to identify skills requirements
- Pg. 35 estimate 4,000 FTE jobs across the whole value chain from the project – it would be useful to have more of a breakdown of their expect numbers for construction and long-term operation
- It would be useful to provide some examples of trades and the types of jobs this will entail – parag. 18.60
- 18.64 about employment when the project becomes operational is very vague
- 18.65 do we need to test out how many agricultural jobs may be displaced as a result of the development
- 18.67 the net additionality of jobs is not significant for the operational stage – there is a disconnect her with the estimated 4,000 FTE jobs across the whole value chain – there is a over reliance on supply chain that are not directly involved in the development/operation
- Impact of perception of visitors and businesses this is very subjective and hard to measure but they have acknowledged
- Is there a plan to support economic benefits during the term of the construction and when the site becomes operational?
- At what stage will the economic business case specific to the project and outline what outputs and outcomes will be delivered in relation to job, apprenticeships, internships, supply chain opportunities etc.

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.

Tuxford Parish Council commented that can not support solar schemes on productive arable or farming land. Benefits to the community need to made clear

Dunham on Trent Parish Council has commented : *The Council has already sent off its view to the consultation, the One Earth Solar consultation is going ahead as detailed in the documents written by One Earth and they are also pro-actively contacting residents to meet face-to-face to discuss the plans further.*"

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.

Fledborough Parish Council - No comments received.

Ragnall Parish Council - No comments received.

Darlington Parish Council - No comments received.

### **Other matters**

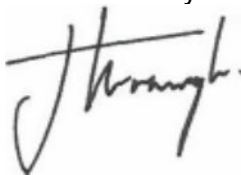
The PINS scoping opinion was issued on the basis that the operational life span of the scheme would be 40 years and the PIER is now exploring an operational life span of 60 years this should be clarified and explored within the Environmental Statement. For likely significant effects to considered in 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.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Through'.

John Krawczyk

Planning Development Manager

Enclosures

Nottinghamshire Fire Service Fire Protection Comments

Trent Valley Internal Drainage Board Comments

Nottinghamshire County Council Policy Section Comments including Archaeology Comments

Nottinghamshire County Council Lead Local Flood Authority Comments

Nottinghamshire County Council Highway Authority Comments

Environmental Management and Design Team, Via East Midlands

Bassetlaw District Council Environmental Health Comments

Bassetlaw District Council's Lead Ecologist Officer Comments

Bassetlaw District Council's Conservation Officer Comments

Natural England Comments

National Grid Comments