

**Newark and Sherwood District Council Draft Solar Energy Supplementary Planning Document Consultation Responses Document**

Responses have been edited and summarised for clarity and concision, and proposed amendments are suggested.

It is also proposed to update the draft SPD to take account of factual changes including changes to national planning policy and guidance, and the progress of the District Council's Local Plan Review.

District Council Officers are currently preparing a Request for Quotation for consultants to undertake the Landscape Sensitivity Study.

<b>Respondent ID / Organisation</b>	<b>Summary of Comment</b>	<b>Response / Action</b>
001 - National Highways	<p>The Draft Solar Energy SPD aims to provide clear guidance on the application and interpretation of local and national policies related to major stand-alone ground-mounted solar photovoltaic (PV) developments in the Newark and Sherwood District.</p> <p>We are broadly supportive of the Draft Solar Energy SPD and believe it serves as a valuable tool for guiding developers on key transport considerations essential for constructing and operating solar farms. Additionally, it provides important information on the NSIP process (for solar farms exceeding 50 megawatts) and the EIA screening process (as outlined in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017).</p> <p>Regarding solar farms adjacent to our network and National Highways considerations, please refer to paragraph 70 of the Circular:</p> <p>Some developments, notably solar farms, wind turbines and those with expansive glass facades, have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, promoters must provide an appropriate assessment of the intensity of solar reflection likely to be produced, which satisfies the company that safety on the SRN is not compromised.</p>	<p>These comments are welcomed.</p> <p>It is proposed to add the following sentence to para 6.36:</p> <p>'Where solar farms would be visible from the Strategic Road Network (SRN), developers must provide an appropriate assessment of the intensity of solar reflection likely to be produced, which demonstrates that safety on the SRN is not compromised.'</p> <p>Change 'Strategic Road Network (SRN)' in para 6.54 to just 'SRN'</p> <p>Define Strategic Road Network in the glossary.</p>

002 - Richard Barnard,  
Resident of Laugherton

**Question 3:**

Our village is located just to the north of the area for consideration around North Clifton / Thorney. We also have projects under consideration within 5 miles to the north (Gate Burton). Then the West Burton Project approximately 3m miles to the east extending over 10 miles, the Cotham project approximately 8 miles northeast and 5 miles to the West the Sturton Le Steeple solar project .

Whilst our village bounders Newark & Sherwood to the west and to the south, we ask that you take into consideration that if all projects are approved then there's the possibility that we could be surrounded by approximately 13,000 acres of solar panels. Whilst I appreciate it is a national significant project I feel that the intensity to our area is excessive.

**Question 5:**

Proposed Battery storage at West Burton, & Cottam is 600 megawatts each. I see that phase 1 of the High Marnham project is around 50Mw. So 600 x 40' containers & West Burton, 600 x 40' containers at Cottam & 50 x 40' containers at High Marnham. What testing / risk assessment has been carried out should there be an event of fire with such a large volume of battery storage?

<https://www.ctif.org/news/solar-farm-lithium-ion-battery-fire-took-four-days-extinguish>.

This was a very small project in comparison. How many miles radius will have to be evacuated? Where will everyone be evacuated to? How long will it be before people can return to their homes and businesses?

During a battery fire, over 100 organic chemicals are generated, including some incredibly toxic gases such as carbon monoxide and hydrogen cyanide – both of which are fatal to humans.

These comments are noted.

No actions are proposed.

See comments from Respondent 010, the Environment Agency (below) concerning Battery Energy Storage Systems.

<p>003 - Nottinghamshire Fire and Rescue Service</p>	<p><b>Section 6.50</b></p> <p>Reading this section it implies that only the following need to be considered.</p> <p>"siting and location of BESS, prevention of the impact of thermal runaway, and emergency services access, can be considered before an application is made".</p> <p>Having worked closely with your team to date there is more to it than just the above.</p>	<p>These comments are welcomed.</p> <p>It is proposed to amend the last sentence of para 6.50 to read:</p> <p>'This is so matters relating to operational safety can be fully considered before an application is made, including the siting and location of BESS within the development site, the prevention of the impact of thermal runaway, and emergency services access.'</p> <p>Reference will also be added to a new appendix on BESS to be included in response to comments from Respondent 010, the Environment Agency (see below).</p> <p>Para 6.50 erroneously contains the words 'thermal runway'; this should be corrected to read: 'thermal runaway'.</p>
<p>004 - Carlton on Trent Parish Council</p>	<p>Solar developments should be on brown fields and roofs leaving agricultural land for food, local resources should be used wherever possible, flood mitigation should be a foremost consideration for developers and any planning response, there should be minimal impact in a conservation area and the views of residents should be taken into account.</p>	<p>Paragraph 3.14 refers to advice from 'Powering Up Britain: Energy Security Plan', and paragraph 6.42 refers to advice from EN-3. These documents guide solar farm development to areas less valuable for food production such as 'brownfield, industrial and low and medium grade agricultural land', or 'previously developed land, brownfield land, contaminated land and industrial land'. It should be recognised, however, that due to the largely rural nature of Newark and Sherwood District it is likely that a major solar development will use agricultural land.</p> <p>Flood mitigation is an important material consideration and is addressed in paragraphs 6.30 and 6.31.</p>

		<p>Impacts on the historic environment and heritage assets are addressed in Chapter 6, and it is agreed that impacts on conservation areas should be minimised.</p> <p>Local residents will be consulted on any solar farm application decided by the District Council, and residents' interests will be considered when preparing Local Impact Reports in response to NSIP applications.</p>
<p>005 - North Muskham Parish Council</p>	<p><b>Question 2:</b></p> <p>The Parish Council suggests that it is important that reference here is also made to the Environment Act 2001 and the strategy document: "A green future- Our 25 year environmental plan to improve the environment"</p> <p><b>Question 4:</b></p> <p>The Parish Council suggests it is important to include impacts on the psychological and physical health of residents in affected communities and the how the proposals have a cumulative effect and impact in the district. Cumulative should include wind farms as well as solar.</p>	<p>The Environment Act 2021 is discussed and a link to it is provided in paragraph 6.10. 'A Green Future: Our 25 Year Plan to Improve the Environment' is discussed and a link to it is provided in paragraph 6.12. It is not considered necessary to refer to these documents elsewhere.</p> <p>Potential psychological and physical health impacts of solar farm developments that fall within the remit of this SPD are covered by Chapter 6, with the following sections most likely to be relevant: Landscape and Visual Impacts, Biodiversity, Habitats and Green Infrastructure, Flooding and Drainage, Cumulative Impacts, Glint and Glare, Community Consultation and Benefits, Residential Amenity, and Public Rights of Way.</p> <p>It is acknowledged that the assessment of cumulative impacts from solar farms may need to take account of other forms of development.</p>

	<p>In preparing the Local Impact Report, the Parish Council suggests it is important to at least ask Parish Councils of their views of the impacts on their communities, as they often have an understanding of local issues and opportunities unknown to higher tier councils.</p> <p>The LIR process should be transparent and approved by elected members and subject to scrutiny.</p> <p><b>Question 6:</b></p> <p>It should be acknowledged that any screening mitigation will not be effective until after several years of maturity of the trees and hedgerows. (How will the stated mitigation in an application be enforced post development, ie: what happens if the hedgerow or tree fails and dies?)</p> <p>A key consideration is the landscape character assessment- this should be emphasised</p> <p>6.10: "Solar farms often have the potential to contribute to a significantly greater BNG without jeopardising the viability of the project"- please add an explanation of how and why?</p> <p>6.13: LNRS- this should be included in chapter 4- also- "Local Policy"</p>	<p>Local Impact Reports (LIRs) are not consultation documents but assessments of likely effects upon a LPA's area. If stakeholders, including Parish Councils, make comments identifying relevant impacts, these can be included in LIRs where appropriate. Parish Council comments that are not suitable to be included in LIRs can still be passed on to interested parties. LIRs must be approved by Planning Committee before they can be submitted.</p> <p>Screening requirements will be assessed for each major solar farm application and will differ in each case. Long term maintenance of screening and other mitigation measures can be required by condition as part of a planning consent. The Landscape Character Assessment identifies Landscape Policy Zones (LPZs) and Chapter 8 sets out that new development must make a positive contribution to the relevant zone(s).</p> <p>On-site biodiversity enhancements will build upon the existing site features and will be different for each application. While it is not considered appropriate for the SPD to suggest how particular levels of BNG could be provided, major solar farms can sometimes deliver more than 10% for reasons including their large scale and long-term nature, and the potential for enhanced connectivity.</p> <p>The 'Local Policy' chapter concerns District Council policies only, and the LNRS will be guidance applicable to all participating Local Authorities.</p>
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	<p>Green Belt- Chapter 13 of the NPPF should be included also in chapter 3- "National Policy and Guidance.</p> <p>Parish Council's should be consulted when achieving the Landscape Character Assessment</p> <p>6.56- How will this be enforced post development?</p> <p><b>Question 8:</b></p> <p>There is surprisingly no mention of Parish Councils within the document, especially given that the solar park proposals will effect largely the rural areas to which they have a democratic mandate to represent their communities.</p> <p>As statutory consultees they should at least be acknowledged that they have a part to play and the Planning Authority should provide guidance to them regarding the NSIP solar project application process and encourage them to participate in the process. Suffolk County Council have compiled a guidance document for their parish councils- please consider this for NSDC area given the grid connection attractions in the area for solar developers</p>	<p>The discussion of issues relating to the Green Belt in Chapter 6 is considered to be sufficient.</p> <p>Parish Councils were consulted during the production of the Landscape Character Assessment.</p> <p>6.56: This paragraph concerns the construction phase of solar farms, so post development enforcement is not relevant.</p> <p>Reference to community consultation, including with Parish Councils, will be added to paragraph 10.2.</p>
006 - Natural England	<p><b>Question 4:</b></p> <p>Natural England generally welcomes the section on Biodiversity, Habitats and Green Infrastructure including the reference to the nature conservation designations at 6.6 and the reference to Natural England's Green Infrastructure Framework at 6.11. We are also pleased to note that the jointly prepared statement "A Biodiversity Net Gain Framework for Nottinghamshire and Nottingham' has been referenced. At 6.10 we welcome the aspiration for solar farms to achieve greater than 10% Biodiversity Net Gain.</p>	<p>These comments are welcomed.</p> <p>No actions are proposed.</p>

	<p>At 6.13 we are pleased to note that the Nottinghamshire Local Nature Recovery Strategy (LNRS) has been included.</p> <p>Natural England welcomes the paragraphs on the protection of Best &amp; Most Versatile land and the aim to encourage the use land for agricultural purposes at the same time as solar power generation where appropriate however land of lesser environmental value should be preferred to BMV land.</p> <p><b>Question 5:</b></p> <p>Natural England welcomes this chapter, particularly the protection of the Birklands &amp; Bilhaugh Special Area of Conservation (SAC) and the Sherwood National Nature Reserve. We are also pleased to note the inclusion of information on the Sherwood possible potential Special Protection Area (ppSPA).</p> <p><b>Question 6:</b></p> <p>Natural England generally welcome this chapter and the reference to the Newark &amp; Sherwood Landscape Character Assessment.</p>	
007 - The Coal Authority	We note that these current consultations relate to issues of Affordable Housing and Solar Energy SPDs. I can confirm that the Planning team at the Coal Authority have no specific comments to make on these SPD documents.	<p>These comments are noted.</p> <p>No actions are proposed.</p>
008 - N.M.Dessurne Resident of Balderton	<p>I have been sent a letter seeking my views, as a local resident and landowner, on the Draft Solar Energy SPD.</p> <p>The comments relate to question 7 on the form: Environment Impact Assessment.</p> <p>Generally speaking, the idea behind solar panels is to mitigate the supposed consequences of climate change, namely; rising sea levels and inland river levels. With respect to these parameters, it is important that the solar developments, themselves, do not add to this problem. Newark, the town, has a serious issue with flooding as it is, with ever more water running into the river Trent, particularly</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>

	<p>from development. This is because land that is developed can no longer absorb water, so the total rainfall ends up in the river. The same applies to solar developments on farmland (not roof tops, which is entirely different).</p> <p>If farmland has not got a crop growing on it throughout the year, the water increase into the river every year is equal to the water that has not been used by the crop. This quantity is estimated to be between 30 and 50 percent of the annual rainfall according to most assessments, and the annual rainfall in the Newark area is normally around 24 inches. 1 inch of rain per acre is equal to 100 tons of water, therefore in 1 year over an area of 10,000 acres the total amount of water is 24 million tons. Even if only 30 percent of this finishes up in the river, it is equal to 7.2 million tons or 7.2 million cubic metres.</p> <p>Under the circumstances, I think that large solar developments in the Newark area is asking for trouble.</p>	
009 - The Canal & River Trust	<p>We note the recognition that appropriate screening could address visual impacts on those using the river corridor. However, there may be other mitigation that could address these impacts. For example, through siting, design or layout. Therefore, we request that the text be amended as follows:</p> <p>6.5 Solar farms can cover a significant surface area so the selection of suitable sites and the use of appropriate <b><u>mitigation measures, including</u></b> screening such as hedgerows are important to ensure that the area of a zone of visual influence can be minimised. Associated infrastructure such as substations or battery energy storage systems should be located within the development site to minimise landscape and visual impacts.</p> <p>Glint and glare have the potential to affect safe navigation along the river by boaters. Therefore, we request that the text be amended as follows:</p>	<p>These comments are welcomed.</p> <p>Apart from changes to Appendix 1 (see below), it is proposed to make all the suggested amendments, with the wording for 6.52 being slightly altered so that it reads better.</p>

6.36 Applicants should identify potential receptors to assess possible glint and glare issues and determine if a glint and glare assessment is necessary. When such an assessment is necessary, applicants are expected to consider how glint and glare could affect receptors and provide an assessment of potential impacts including the duration of the effect and the intensity of the reflection. It may be necessary to consider impacts on aviation **and river navigation.**

6.48 /6.49 Text should be amended acknowledging that impacts in sensitive areas could be mitigated through undergrounding cable connections.

6.50 Text should be amended acknowledging that visual and other impacts can arise from BESS proposals that may require mitigation. Text should be amended to recognise that security measures should be appropriately designed, or impacts mitigated. Suggested text is provided below:

6.52 Planning applications for solar farms should include details of all site security measures such as perimeter fencing, CCTV cameras and lighting. It is recognised that such measures will usually be necessary. Consideration should be given to potential impacts including those upon habitats and biodiversity, landscape, heritage assets, public rights of way and residential amenity. How potential impacts might vary according to the time of day or the season of the year should be taken into account. Security measures, in particular fencing and lighting, should not be excessive and may require justification. **They will need to appropriately designed or adverse visual impacts mitigated through other means.**

6.60 We note that the most part the paths alongside the river navigation are PROWs.

8.5 We note that the Landscape Sensitivity Study has not been provided so we are unable to comment on it.

Appendix 1 reproduces Building Research Establishment advice verbatim. Altering it in

	<p>Appendix 1: The list of information to be included within a LVIA should also include cross sections/planting plans etc, including as part of the non-technical summary.</p>	<p>any way would make it direct advice from Newark and Sherwood District Council and this is not intended. It is not, therefore, considered appropriate to alter Appendix 1.</p>
<p>010 - Environment Agency</p>	<p>We are pleased to note that the key points and references to relevant legislation have been included within the draft document. Therefore, our comments are not extensive in nature however we have highlighted some minor points and observations which are listed below.</p> <p><b>Section 6.6</b> – while SACs, SSSIs and LWSs do not fall under the direct remit of the Environment Agency we are pleased that these have been highlighted and recognised as requiring protection as key areas for nature conservation.</p> <p><b>Sections 6.7 and 6.8</b> – We are pleased that these sections discuss the importance of incorporating new and improving existing Green infrastructure (GI) through new development. It is particularly encouraging that the GI sections also make reference to the important role that bodies of water such as rivers (Blue Infrastructure) play in developing effective GI interventions.</p> <p><b>Section 6.10</b> – The inclusion of reference to the requirement for a minimum of 10% Biodiversity Net Gain (BNG) is a welcome addition to the document. We are very pleased that emphasis is placed on this being a minimum and should not be viewed as a “suggested maximum” encouraging developers to deliver in excess of 10% where possible.</p> <p><b>Sections 6.13, 6.14 and 6.15</b> – These sections highlight the future implementation of the Local Nature Recovery Strategy (LNRS) for Nottinghamshire. It is encouraging to see a large emphasis placed on this as the EA are keen to work closely with our partners on the development of the LNRS moving forward.</p> <p><b>Sections 6.30 and 6.31</b> - we agree with the content of both sections and have nothing further to add. It may be beneficial to reference</p>	<p>These comments are welcomed.</p> <p>It is proposed to add reference to Core Policy 10 to para 6.31. The comments on para 6.50 are particularly helpful and it is proposed that these are added to the SPD as a new appendix on Battery Energy Storage Systems, and that reference to this is added to para 6.50.</p>

Core Policy 10 – Climate Change for further information regarding flood risk.

### **Section 6.50 – Battery Energy Storage Systems**

**Section 6.50** – we have some advisory notes which we have been sending out to relevant LPAs when applications are received which you may wish to include in this document or consider for future applications which are submitted which are detailed below.

#### ***Informative – General guidance for BESS developments***

*In line with [planning practice guidance](#):*

- *Applicants should engage with Local Fire & Rescue Services issues of siting and location of BESS are dealt with before applications are made. Ideally this should be done before submitting a planning application.*
  
- *Local planning authorities to refer to [guidance produced by the National Fire Chiefs Council](#) for consideration when determining applications and consult with local Fire & Rescue Services before issuing decisions.*
  
- *Applicants will also need to comply with relevant Building Regulations in [Part B](#). They require applicants to provide suitable access for the fire service.*

#### ***Informative - Management of end of life industrial batteries***

*Battery energy storage systems (BESS) facilities are not regulated under the Environmental Permitting Regulations regime.*

*However, battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs.*

	<p><i>Batteries have the potential to cause harm to the environment if stored inappropriately e.g. subject to a fire as the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place.</i></p> <p><i>The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.</i></p> <p><i>Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.</i></p>	
<p>011 - South Clifton Parish Council</p>	<p><b>Question 1:</b></p> <p>1.9 – We are pleased to see that N&amp;SDC has committed to a study regarding major solar developments that have planning permission, have been developed or under construction; and that it will include neighbouring areas to our district, and will use this information to produce a Land Sensitivity Study. Can you confirm this will be used to assess the suitability of NSIPs in the district and their proximity to each other and other major developments? Will this information form part of the Districts’ response to the Planning Inspectorate?</p> <p><b>Question 2:</b></p> <p>We appreciate that the NPPFs’ environmental objective is to protect and enhance our natural, built and historic environment.</p> <p>3.4b recommends approving an application if its impacts are (or can be made) acceptable. How will this apply to NSIPs’ and are the local community/councils included in the process to decide what is acceptable?</p>	<p>The Landscape Sensitivity Study will take account of take account of all solar farm developments including those which are NSIPs. The advice provided will also be applicable to all solar farm developments including NSIPs. It is expected that the Landscape Sensitivity Study will inform Local Impact Reports (LIRs) produced by the District Council when commenting on NSIP proposals.</p> <p>Paragraph 3.4 quotes directly from the NPPF. The section of the NPPF quoted has been altered since the draft SPD was produced and the text referred to has been deleted. This text will therefore not be carried forward in the draft SPD.</p>

	<p>3.14 states that solar and farming can be complementary – How can this apply to NSIPs that propose to use vast areas of farming land and to fence it off to all, humans and wildlife?</p> <p><b>Question 3:</b></p> <p>We are, at present, trying to reduce the vast size and scale of the One Earth Solar Farm. As a council we are not anti-solar and had the proposal from OESF been less invasive, changing the look, feel and structure of our farmland and countryside, many would have been more supportive.</p> <p>Reading chapter 5, we cannot help but think the guidance is skewed towards the developers and that the villagers affected have little support from N&amp;SDC. We appreciate that Chapter 5 gives a clear framework for the consideration of NSIPs by the Secretary of State, but would like to see a clear consultation and aid process between N&amp;SDC and the small councils, meetings and villagers affected by these huge plans. The developers of the proposed NSIPs have a huge amount of funding behind them to afford the best personnel, whereas, the ‘locals’ have little experience/expertise, financial clout and the wherewithal to fight effectively. 5.10 onwards mentions ‘local authorities’ several times. Can you clarify who exactly are the local authorities?</p> <p><b>Question 4:</b></p> <p>On the whole, this chapter seems to cover most considerations effectively.</p> <p>6.31 – says a Flood Risk Assessment should demonstrate that the site will remain safe in the future, taking into account the effects of climate change. We are concerned that this assessment should take in the surrounding areas around the site too as they could be significantly impacted.</p>	<p>Paragraph 3.14 discusses ‘Powering Up Britain: Energy Security Plan’. This document states:</p> <p>‘Solar and farming can be complementary, supporting each other financially, environmental and through shared use of land. We consider that meeting energy security and climate change goals is urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.’</p> <p>This guidance is applicable to all solar farm developments including NSIPs.</p> <p>Parish Councils will be consulted directly on major solar farm applications affecting their area that are decided by Newark and Sherwood District Council. With NSIPs, the District Council will prepare a Local Impact Report (LIR) that assesses likely effects but these are not consultation documents and not a way to object to or express approval for development proposals. If stakeholders, including Parish Councils, make comments identifying relevant impacts, these can be included in LIRs where appropriate. Parish Council comments that are not suitable to be included in LIRs can still be passed on to interested parties. In the context of paragraph 5.10 onwards, the local planning authority in Newark &amp; Sherwood District is Newark and Sherwood District Council.</p>
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	<p>6.32 – very pleased to see this included - will this include NSIP proposals too?</p> <p>6.42 – Is there any mechanism/proposal in place to crosscheck the land classification supplied by the applicant?</p> <p>6.45 – pleased to see the district councils’ involvement here – again does this apply to NSIPs</p> <p>6.46 – it must be pointed out that OESF is planning on a 60-year span.</p> <p>6.47 – how can the land be assessed as having been restored to its previous condition? Is there a mechanism whereby the district council can check this? How involved would the District Council be with this assessment if the site being decommissioned is an NSIP?</p>	<p>Flood Risk Assessments will need to show that a proposed development will not increase flood risk to the surrounding areas for the duration of the operational time of the development in order for planning permission to be granted.</p> <p>NSIP proposals will be assessed in terms of cumulative impact in the same way as other solar energy developments.</p> <p>District Council Officers check land classifications using the Agricultural Land Classification Map East Midlands Region (ALC005) produced by Natural England. These maps are not sufficiently accurate for use in assessment of individual fields or sites, however, and Grade 3 agricultural land is not subdivided into 3a and 3b. More detailed survey work, including soil sampling, can be required to determine the Agricultural Land Classification of an individual site.</p> <p>The District Council seeks to secure the most generous benefits possible for communities affected by solar farm developments including NSIPs.</p> <p>The first sentence of this paragraph will be amended to read: ‘Although solar farms can typically be expected to operate for up to 60 years, they are usually temporary structures and how they will be decommissioned should be considered as part of any planning application.’</p> <p>The condition of the land prior to the commencement of the development scheme, including biodiversity, will be assessed as part</p>
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	<p>6.57 – the positioning of inverters, transformers and sub-stations is a factor that really worries our parishioners. Is there an argument for stating a minimum distance in the SPD?</p> <p><b>Question 8:</b></p> <p>South Clifton Parish Council welcome this opportunity to review and comment on the Draft Solar Energy SPD.</p> <p>We are not used to reading and responding to these sorts of documents and we realise that maybe some of our comments may not apply specifically to the SPD but have come about because of our present situation. We felt it important, however, to try and be involved with this consultation and hope you will review our input favourably.</p>	<p>of any application including NSIPs. Although District Council officers would have less involvement with NSIPs than some other types of application, land restoration as part of the decommissioning process can still be ensured. A Development Consent Order (DCO) would be required to permit an NSIP, and DCOs can contain conditions that set out decommissioning requirements.</p> <p>While concerns about the location of equipment ancillary to solar farms are understood, there is no basis in national or local policy for setting a minimum distance. The imposition of an arbitrary minimum distance would be inappropriate because factors including landform and screening can mean that different separation distances are acceptable in different cases. Impacts on residential amenity will be assessed for each individual proposed development.</p>
<p>012 - Nottinghamshire Wildlife Trust</p>	<p><b>Question 2:</b></p> <p>The Wildlife Trusts are in favour of installing solar energy generation capacity on buildings, where it can be developed with no additional land-take and negligible negative environmental impact. If ground-mounted solar arrays are thoughtfully located and carefully designed, their negative impacts on the natural environment can be avoided. In many circumstances there is scope for high quality wildlife habitat to be created or enhanced around the solar panels. It is not, however, appropriate to develop solar energy generation capacity or its associated infrastructure directly on areas of recognized existing high wildlife value habitat, either within designated nature conservation sites or outside them, or where harm is likely to be caused to populations of vulnerable, threatened or endangered species.</p>	<p>These comments are welcomed. See below consideration of enhancement measures for skylarks.</p>

Nottinghamshire Wildlife Trust works proactively within the planning system. We are committed to engage with consultations on local plans and supplementary planning documents and we take all necessary steps to help ensure that the right policy context is in place to guide solar and other renewable developments. We are also routinely consulted by Local Planning Authorities on planning applications, including solar schemes. The key to addressing both a future powered by renewables and having communities who will welcome the necessary infrastructure is a policy framework based on having the right technologies, in the right places, deployed at the right scales.

It is important to recognise that not all solar farms are the same. Some proposals set higher standards, deliver greater social and environmental benefits. It is, therefore, beneficial to all concerned to engage with the renewable energy sector at an early stage so that potential constraints and concerns can be discussed to ensure wildlife and sites designated for their nature conservation value are protected. We also aim to achieve the best outcomes for wildlife in terms of habitat enhancement and creation. A good example of this is NWT are to have a presence on a steering group for the Great North Solar Park. NWT responded to the preliminary consultation with Elements Green and continued to be in dialogue with them about some elements of the design following the submission of the initial Environmental Impact Assessment (EIA) scoping report. As a result of engagement, we have influenced plans for the area to try and achieve the best outcomes for wildlife. We are also actively engaging with proponents of the One Earth Solar Farm, Tillbridge Solar Project and Gate Burton Energy Park.

It is stated in paragraph 6.42 'EN-3 advises that while land type should not be a predominating factor in determining the suitability of the site location for solar farms regarded as NSIPs, applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land.' There are examples of previously developed land that has developed significant wildlife value that is cherished by local communities.

Such sites are threatened by redevelopment (due to their common status as brownfield sites), inappropriate 'restoration', inappropriate management or natural succession. It is for this reason there should not be a presumption to develop brownfield sites and a proper assessment of their wildlife value and status is necessary.

The following information is available on the Government website: Verified sites of Open Mosaic Habitat. Open mosaic habitats can be extremely diverse, including such wide-ranging sites as railway sidings, quarries, former industrial works, slag heap, bings and brick pits. Brownfields with open mosaic habitats show evidence of previous disturbance, either through soil being removed or severely modified by previous use, or the addition of materials such as industrial spoil, with spatial variation developing across the site. The resultant variation allows for a mosaic of different habitats to be supported in close proximity. This habitat diversity can support rich assemblages of invertebrates, which has led to 'open mosaic habitats on previously developed land' being added to the UK Biodiversity Action Plan (UK BAP) as a Priority habitat listed on Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act). Full metadata can be viewed on [data.gov.uk](http://data.gov.uk). More information about the Open Mosaic Habitat inventory can be found on the Buglife website. Open Mosaic Habitat (Draft) - [data.gov.uk](http://data.gov.uk)

**Question 4:**

Many species of plants and animals in England, and often their supporting features and habitats are protected. The law varies from species to species. Harm or disturbance to protected species and their habitats should be avoided. Mitigate for the effect on them if it's not possible to avoid harm and compensate for harm as a last resort. A licence may need to be applied for to allow activities that would otherwise be illegal. Changes brought in by the Environment Act 2021 mean that a mitigation licence for animals and plants listed in schedule 5 and schedule 8 of the Wildlife and Countryside Act 1981 is required. Protected species licensing requirements are in addition to the requirements for planning permission. Licences are

	<p>subject to separate processes and specific policy and legal tests. Some species are designated and protected as European protected species (EPS). EPS get full protection under The Conservation of Species and Habitats Regulations 2017. It's an offence to deliberately capture, injure or kill, or deliberately disturb EPS. Examples include bats, dormice, otters and great crested newts.</p> <p>Section 6.47 states: Any application to develop a solar farm should be supported by information about how the project will be decommissioned and how the land used will be, at a minimum, restored to its previous condition. Any landscape improvements, biodiversity enhancements and community benefits should be retained.</p> <p>We support the approach to retain biodiversity enhancements to ensure that established wildlife habitats are retained but we request clarification on how that will apply to in-field habitat enhancement for skylark. For example, where skylark plots were created within farmed land that was under the applicant's control during the lifetime of the solar scheme.</p>	<p>Where enhancement measures for skylarks are required to mitigate the effects of developing land that was previously agricultural, these measures will no longer be required when the land is restored to its original condition. It is proposed to amend the second sentence of paragraph 6.47 to read: 'Any landscape improvements, biodiversity enhancements and community benefits should be retained if appropriate'.</p>
<p>013 - The Ministry of Defence</p>	<p>I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to the Newark &amp; Sherwood District Council Draft Solar Energy Supplementary Planning Document (SPD) for public consultation. The Draft Solar Energy SPD provides guidance on the application and interpretation of local and national policy on major stand-alone ground mounted solar photovoltaic (PV) developments in the District, with special consideration given to protected local features. As an SPD, the document provides guidance on policies but does not develop new ones.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in</p>	<p>These comments are welcomed.</p> <p>It is proposed that a new section is added at the end of Chapter 6: Material Considerations called 'Ministry of Defence interests'. This will include all the material the MoD request to be added and some of the information that they provide, ensuring that all their concerns are addressed. It is also proposed that this new section is cross-referenced in the 'Biodiversity, Habitats and Green Infrastructure' section of Chapter 6.</p>

conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

The area covered by any Newark & Sherwood District Council Draft Solar Energy SPD will both contain and be washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Waddington, RAF Barkston Heath, RAF Syerston, RAF Cranwell, and Eastern 1 WAM (Wide Area Multilateration) Network.

Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the change of use of land to allow/facilitate flying activities; and the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.

- Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. Within these zones development that has the potential to provide an attractant environment to certain large and/or flocking bird species hazardous to aviation safety may be subject to design requirements or for management plans to be applied. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone.

• Finally, those technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example in the case of a wind turbine or a solar PV system mounted on a roof.

Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to

o Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.

o Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m;

o Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or MOD property.

The MOD welcomes that the draft guidance within Pg.12 Local Policy: Policy DM4 – Renewable and Low Carbon Energy Generation: Section 4.4 have identified that planning permission will be granted for renewable and low carbon energy generation development, as both standalone projects and part of other development, its associated infrastructure (including battery storage) and the retrofitting of existing development, where its benefits are not outweighed by detrimental impact from the operation and maintenance of the development and through the installation process upon: 7. Aviation interests of local or national importance.

Additionally, the MOD welcomes the provisions of Pg 21: Material Considerations: Glint and glare and additional context at paragraph 6.36: “Applicants should identify potential receptors to assess possible glint and glare issues and determine if a glint and glare assessment is necessary. When such an assessment is necessary, applicants are expected to consider how glint and glare could affect receptors and provide an assessment of potential impacts including the duration of the effect and the intensity of the reflection. It may be necessary to consider impacts on aviation.”

The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations.

The MOD request that the wording of the draft guidance is broadened to inform developers that only those applications for development which would not compromise, restrict or otherwise

	<p>degrade the operational capability of safeguarded MOD sites and/or assets will be supported.</p> <p>The proposed draft guidance: Material Considerations: Green Infrastructure home at paragraph 6.10: “Applicants Green and Blue Infrastructure and Nature Recovery identifies that “Under the Environment Act 2021, all major projects granted planning permission in England, including solar farms, must deliver at least 10% biodiversity net gain (BNG). BNG means managing land through development in a way that leaves the natural environment in a measurably better state than it was beforehand. It is intended to ensure that through enhancing habitats, developments increase biodiversity and create new green spaces for local communities to enjoy. It should be noted that 10% is a minimum, but not a suggested maximum, and projects delivering a higher percentage of BNG are welcomed. Solar farms often have the potential to contribute a significantly greater BNG without jeopardising the viability of the project, and this will be sought by the District Council where possible.”</p> <p>The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; Newark &amp; Sherwood District Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety.</p> <p>Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.</p>	
014 - Nottingham Trent University	<p><b>Question 1:</b></p> <p>We would suggest that as the date for the Examination into the AADMDPD has now been set, this could be referred to in the introduction. It is noted that the Council are commissioning a study looking in detail at the sensitivity of the Districts landscape to further</p>	<p>These comments are welcomed.</p> <p>It is proposed to update the Introduction to give the latest position with the Plan Review.</p>

solar energy developments. It would be useful to understand what status this study will have, the timescale for its production, whether landowners will be expected to/requested to feed into the study and whether its findings will be subject to formal consultation.

**Question 2:**

In Chapter 3, when referring to the National Planning Policy Framework (NPPF), we consider that reference should be made to the recent consultation on changes to the NPPF (which closes on Tuesday 24th September 2024). The proposed changes, if made, will give additional emphasis on the need for local authorities to identify sites for renewable and low carbon energy sources. Proposed amendments to paragraph 164 emphasise that Local Authorities should give support to applications for all forms of renewable and low carbon development. Whilst these changes to the NPPF have not yet been confirmed, they do indicate the current Government's direction of travel in terms of proposals for renewable and low carbon development. When referring to other documents such as 'Powering Up Britain: Energy Security Plan' and others referred to in Chapter 3, we consider that the SPD should make reference to the fact that some of these documents were issued under the previous Government and prior to the general election in July 2024.

**Question 3:**

It is helpful that the draft SPD sets out the NSIP process. We consider that it would also be beneficial for the SPD to set out how the Council will engage with applicants of proposals that are deemed to be NSIP's to ensure that all relevant requirements as set out by the Act are followed. For example, does the Council have an identified Officer (or role) who will deal with such applications to ensure all necessary and relevant procedures are followed and deadlines are met, such as working together on the Statement of Common Ground for example?

**Question 4:**

It is proposed to update the Chapter 3 section on the NPPF.

It is not considered necessary to state that some documents were issued under the previous Government.

It is not considered necessary and may go beyond the remit of the SPD to add further material about NSIPs.

	<p>Landscape and Visual Impacts - as referred to in our comments on Chapter 1, it would be useful to have further clarification on when the Landscape Sensitivity Study will be completed, when applicants will have access to its findings, and what status it will have.</p> <p>Green Belt - the draft SPD currently states "Chapter 13 of the NPPF has the potential to be a significant constraint on major solar development in the Green Belt". We consider it would be useful for the SPD to elaborate further on this statement, given that the NPPF notes that Very Special Circumstances for renewable energy proposals can be developed, including the fact that the wider environmental benefits associated with increased production of energy from renewable sources may be considered to be a Very Special Circumstance. This is particularly relevant in the context of the proposed amendments to paragraph 164 of the NPPF which is currently out for consultation as referenced earlier in these comments.</p> <p>Cumulative impacts - reference is made to how the forthcoming Landscape Sensitivity Study will be valuable in assisting the assessment of cumulative impacts. As set out earlier in these comments, it would be useful to understand when this study will be available and its intended status. Applications for solar farm proposals which are deemed to be EIA development would assess the cumulative environmental impacts of such proposals. However, it would be useful for the SPD to set out how the Council consider proposals which are deemed to be non EIA development should undertaken this type of assessment.</p> <p>Agricultural Land Classification - it is welcomed that the SPD acknowledges that Newark and Sherwood District is largely rural in character and there is unlikely to be enough previously developed land available to accommodate large scale solar farms. Similarly, it is encouraging that the Council will welcome proposals that use land for agricultural purposes at the same time as solar power generation. However, we would propose that the phrase 'where appropriate' at paragraph 6.41 should be amended to be 'where</p>	<p>It is proposed to update the Section on Green Belt in Chapter 6. 'Grey belt' land will be referred to here and described in the glossary.</p> <p>It is not considered necessary to add extra material about cumulative impacts.</p> <p>The proposed amendment is not considered necessary. The use of land for agricultural purposes at the same time as solar power generation does not require justification. In this context 'appropriate' would perhaps best be understood as meaning 'practicable'.</p>
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these can be justified and supported by relevant assessments and supporting information', as the definition/interpretation of 'appropriate' may differ between the Council and the applicant.

Community Consultation and Benefits - we would welcome further clarification on what the Council means by the statement at paragraph 6.45 "Separately but alongside any planning process the District Council will negotiate on behalf of communities within the District to secure the most generous benefits possible for them". As noted at paragraph 6.44, any obligations through Section 106 agreements have to meet the necessary tests as noted. We would query therefore, what the Council means by 'securing benefits from solar farm proposals outside of the planning process'? How does the Council propose to secure such benefits and how does the Council propose to work with applicants on this matter?

Decommissioning and Restoration - further clarification is requested as to in what circumstances the Council would propose to introduce a condition which limits the operational life of the development?

Residential Amenity - we would propose a slight amendment to the wording of paragraph 6.56 so that it reads "It should be demonstrated that there will be no unacceptable impacts which cannot be mitigated on residential amenity..." Additionally, in the context of reference to noise, it would be useful to state that an appropriate noise assessment should be undertaken to understand the potential impacts of noise and any proposed mitigation.

**Question 5:**

Nottingham Trent University (NTU) operates the Brackenhurst campus to the south of Southwell. NTU are aware of the protected key views in relation to Southwell which are protected under existing policies in the ADMDPD. We would propose a slight amendment to the text at paragraph 7.11 so that it states "Any development proposal within these areas must demonstrate that there will be no negative impact on the views of the heritage assets which cannot be mitigated".

The District Council has a role to play in securing community benefits that goes beyond the planning system and this is dealt with separately to deciding or commenting upon planning applications.

It is not considered necessary to add extra material about Decommissioning and Restoration. The draft SPD says that this will be 'where appropriate', and this will be assessed as part of development management processes for each individual application.

It is proposed to add 'which cannot be mitigated' to para 6.56.

It is proposed to add 'which cannot be mitigated' to para 7.11.

	<p><b>Question 6:</b></p> <p>Reference is made to the forthcoming Landscape Sensitivity Study in Chapter 8. As referred to in our earlier comments, we would welcome clarification on when this study will be available and its intended status.</p> <p><b>Question 8:</b></p> <p>NTU welcome the opportunity to make representations to this proposed SPD. It will be useful to have this SPD in place to inform potential applicants of the Council's expectations of what needs to be considered in any applications for major solar farm development. However, NTU consider that a number of points of clarification and some minor amendments are required in order to provide complete clarity on the Council's approach to such applications.</p>	
015 - Historic England	<ul style="list-style-type: none"> <li>• Paragraph 1.9 we note the proposed Landscape Sensitivity Study and would request that the historic environment is fully embedded within this study to ensure that appropriate locations are sought that protect the significance of the historic environment, heritage assets and their setting. As a statutory consultee we are available to offer advice on this study as it is being prepared.</li> <li>• Paragraph 2.2 could include a reference to the historic environment protection/ enhancement measures within the sentence that discusses biodiversity and landscape measures.</li> <li>• Paragraph 3.6 do you have any additional guidance on the historic environment, as this could be referenced here.</li> <li>• We support paragraph 4.1.</li> <li>• Paragraph 6.2 would be useful to ensure that the historic environment is referenced within this section, as a component of landscape, to ensure that it is fully considered at the appropriate time.</li> </ul>	<p>These comments are welcomed. We will aim to ensure that the historic environment is fully considered within the Study, and Historic England will be consulted.</p> <p>It is not considered necessary to add a reference to the historic environment protection/ enhancement measures to para 2.2.</p> <p>It is proposed to add reference to PPG on the historic environment to para 3.6.</p> <p>It is not considered necessary to refer to the historic environment here due to the section of Chapter 6 on Historic Environment and Heritage Assets.</p> <p>It is clearly stated that they are registered parks and gardens in para 6.16 and while</p>

	<ul style="list-style-type: none"> <li>• Paragraph 6.16 needs to be clear that the four heritage assets referenced are RPGs. Also, is there any value in only referencing these heritage assets and no others?</li> <li>• Paragraph 6.17 would be useful to reference the Conservation Area Management Plans and how any planning application and local plan allocation will need to take account of these documents.</li> <li>• The heritage section should also reference archaeology that is unknown but has the potential to be of national importance. It would be useful to broaden the list of what may affect the significance of a heritage asset such as noise/ traffic movement/ the development stage/lighting/glint and glare from the solar panels etc.</li> <li>• Delete heading 'heritage and tree conservation' as there does not appear to be any information relating to this topic.</li> <li>• Its promising to have a section that offers some more detail about the issues to consider. We would recommend that prospective developers consult the Historic Environment Record (HER) in the first instance, to understand what heritage assets there might be. Further, we recommend some additional detail about studies that may need to be undertaken to consider the harm to heritage such as landscape and visual assessment, views analysis, statements of significance etc. Any application or local plan allocation should be clear on how the proposal may affect the significance of a heritage asset and if there are any avoidance/ mitigation measures available to overcome any harm. Would be beneficial if the document also related to paragraph 206 of the National Planning Policy Framework (NPPF) and how harm to heritage should be 'wholly/exceptional'.</li> </ul>	<p>other heritage assets are referred to, it would be impractical and unnecessary to list them all individually.</p> <p>It is proposed to add reference to Conservation Area Management Plans to paragraph 6.17</p> <p>It is proposed to add reference to archaeology that is unknown but has the potential to be of national importance and to broaden the list of what may affect the significance of a heritage asset in para 6.21 as suggested.</p> <p>No action necessary. This is a link, not a heading.</p> <p>These proposed amendments should be made to the section of Chapter 6 on Historic Environment and Heritage Assets. The Historic Environment Record will be referred to in paragraph 6.16. 'Any application or local plan allocation should be clear on how the proposal may affect the significance of a heritage asset and if there are any avoidance/ mitigation measures available to overcome any harm' will be added to paragraph 6.19.</p>
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	<ul style="list-style-type: none"> <li>• Historic England recognises the challenge of climate change and are keen to seek opportunities for the historic environment to play a role and adapt in a suitable way. It would also be beneficial to assess if there are any enhancement opportunities available for the historic environment, as a result of proposals.</li> <li>• We welcome a section on archaeology and the need for appropriate archaeological assessments.</li> <li>• We are supportive of a section on cumulative impacts as we find that sometimes an additional site can be the tipping point in a landscape/ impact to a heritage asset. We would welcome heritage being listed within the list on page 18.</li> <li>• We recognise that there is a section on 'glint and glare' and we would welcome it referencing the potential impact on the historic environment.</li> <li>• Paragraph 6.49 also needs to consider the historic environment within the proposals for any grid infrastructure connectivity and how this infrastructure may affect the significance of heritage assets and should avoid harm.</li> <li>• Paragraph 6.50 also needs to consider whether battery storage proposals will have any affect on the significance of heritage assets and avoid any harm.</li> <li>• We welcome a reference to heritage assets within paragraph 6.52 as often these are issues that adversely affect the significance of heritage assets and need careful consideration.</li> <li>• Paragraph 6.53 further needs to consider the impact on the historic environment and how these issues need to be fully considered and harm avoided before proposals are considered.</li> <li>• We welcome a paragraph on Laxton Open Field System and would welcome ensuring any text is clear that harm to these heritage assets should be avoided and other areas for development are sought.</li> </ul>	<p>Reference to enhancement opportunities for the historic environment will be added to paragraph 6.19.</p> <p>Add reference to heritage assets to para 6.33.</p> <p>Add reference to heritage assets to para 6.36 (along with reference to river navigation requested by the Canal and River Trust).</p> <p>It is not considered necessary to make this change to para 6.49</p> <p>It is not considered necessary to make this change to para 6.50</p> <p>It is not considered necessary to make this change to para 6.53</p> <p>It should be made clear that harm to the heritage assets in Laxton should be avoided as the text in the draft SPD relies on Policy ShA/L/1 and this is not certain to be adopted. It is not considered appropriate to say that others areas should be sought as sites near Laxton cannot be ruled out by this SPD.</p>
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	<ul style="list-style-type: none"> <li>• Section 8, we would welcome the inclusion of heritage within this section, as it is a component of landscape.</li> <li>• Section 10. Historic England also offers a pre-application service if useful for prospective developers.</li> <li>• Include heritage within the list of considerations in Appendix 1.</li> </ul> <p>There is no detail for Appendices 2-5, is there any other information you require us to consider at this stage.</p>	<p>This is unnecessary as this chapter is about the LCA SPD. It is not considered necessary to mention Historic England's pre-application service.</p> <p>Appendix 1 reproduces Building Research Establishment advice verbatim. Altering it in any way would make it direct advice from Newark and Sherwood District Council and this is not intended. It is not, therefore, considered appropriate to alter Appendix 1.</p>
016 - Central Lincolnshire	<p>Thank you for consulting Central Lincolnshire on your Draft Interim Affordable Housing SPD and Draft Solar Energy SPD. We can confirm that Central Lincolnshire have no comment to make on either SPD at this time.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>
017 - Newark Town Council	<p>Newark Town Council support the public consultation document.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>
018 - Upper Witham Internal Drainage Board	<p>The Board has no comment on the documents.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>