



**NEWARK &  
SHERWOOD**  
DISTRICT COUNCIL

# LOCAL IMPACT REPORT

## ONE EARTH SOLAR FARM

**JULY 2025**

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**NEWARK AND SHERWOOD DISTRICT COUNCIL**

## Overview

In preparation of this Local Impact Report (LIR) Newark and Sherwood District Council (NSDC) have focussed on those matters, for which we hold technical expertise at an officer level, supplemented by external advice on the topics of Landscape and Visual Impact Assessment (LVIA) and Agricultural Land Classification (ALC). For those matters whereby Nottinghamshire County Council (NCC) hold officer level expertise (such as Highways, Flood Risk and Archaeology), we have largely left to NCC to respond upon, except where we have any local emphasis to add, including through engagement with the local community. Accordingly, our LIR focuses upon the following main topic areas.

- Landscape and Visual Impact (Including Residential Amenity).
- Biodiversity (including Net Gain) and Arboriculture.
- Noise and Vibration
- Air Quality
- Land use and Soils.
- Built Heritage
- Socio Economics.

Reference to the NCC LIR should be made for the following topic areas.

- Transport, Access and Public Rights of Way.
- Flood risk and water (Environment Agency are the regulatory adviser on water quality).
- Archaeology.

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## **1. Terms of Reference and Introduction**

- 1.1. This report comprises the Local Impact Report (LIR) of Newark and Sherwood District Council (NSDC). The Council has also had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), and Nationally Significant Infrastructure Projects: Advice for Local Authorities<sup>1</sup> Guidance, in preparing the LIR.

## **2. Scope, Purpose, and Structure of the Local Impact Report**

- 2.1. Unless otherwise specified, the LIR only relates to the proposed development insofar as it affects the administrative area of NSDC. Specifically, it describes the impact of the proposed 'Works' (as described in the Development Consent Order (DCO)) and as referred to in section 3 below. Noting that the proposed development falls within different local authority districts, this LIR should be read in association with any similar LIR produced by any or all of the following authorities.
- Nottinghamshire County Council.
  - Bassetlaw District Council.
  - Lincolnshire County Council.
  - West Lindsey District Council.
- 2.2. This LIR has been prepared to highlight the ways in which the proposed development will affect the locality and local communities and the associated impacts. It is not intended as a precise technical document – the application is accompanied by a significant amount of technical information from the applicant – but as a broad overview of the likely issues (positive, negative, and neutral) that might arise from the proposed development. As noted by Government Guidance (also referred to above) this LIR provides an appraisal of the projects compliance with relevant local planning policy and guidance, but it does not contain an assessment of relevant National Policy Statements, on the basis that such an assessment is carried out by the Examining Authority.
- 2.3. The LIR is intended as a factual document and does not attempt to come to a conclusion on the acceptability, or otherwise of the proposals. It does, however, seek to identify where there is compliance (or conversely where there is a tension or conflict) with, in particular, local plan policy, and to distinguish between matters that are of most potential impact and those that are either temporary or less significant in the longer term.

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<sup>1</sup> [Nationally Significant Infrastructure Projects: Advice for Local Authorities - GOV.UK](#) Last accessed 23/06/2025

- 2.4. NSDC are currently engaged with the applicant in preparing a Statement of Common Ground, an iterative document which further explains elements of the proposed development which are being discussed with the applicant. Due to the evolving nature of these discussions, NSDC's position as recorded in this document is subject to change.
- 2.5. In addition, NSDC has not, at this stage, undertaken a full review of the draft Development Consent Order. NSDC will review in detail the draft articles and requirements as prepared by the applicant, and suggest any necessary additions and amendments, at the appropriate time during the Examination and intends (among other things) to address these matters in its Written Representations.

### 3. The Scheme

- 3.1. This LIR does not describe the proposed development any further, relying on the applicant's description as set out at paragraph 5.1.2 (Scheme Description) of document 6.5 Environmental Statement - Chapter 5 (Doc Ref: APP-034) which states:

*'The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility. The project includes solar PV panels, Battery Energy Storage Systems (BESS), onsite substations and associated grid connection infrastructure which will allow for the generation and export of electricity to the proposed National Grid High Marnham Substation. The Applicant has secured a connection agreement with National Grid which will allow export and import of up to 740 megawatts (MW) of electricity to the National Grid High Marnham Substation.'*

- 3.2. The key components of the proposed development are further set out in paragraph 5.42 and 5.43 of document 6.5 Environmental Statement Chapter 5 (Scheme Description). Paragraph 5.42 states as follows:

*'The Order limits comprises approximately 1,414 ha (3,494 acres) and includes the following components. The Proposed Development is also described in Schedule 1 of the draft DCO [EN0101059/APP/3.1] where the "authorised development" is divided into works packages. The works numbers for those packages are identified below and are referred to throughout this ES.'*

*Work No. 1: Solar PV Infrastructure.*

*Work No. 2: BESS.*

*Work No. 3: Substations.*

*Work No. 4: Grid Connection Cable Route and work to facilitate the connection to the National Grid High Marnham substation.*

*Work No. 5: Ancillary Works.*

*Work No. 6A: Primary Construction and Decommissioning Compounds.*

*Work No. 6B: Secondary Construction and Decommissioning Compounds.*

*Work No. 7: Highway Works and works to facilitate access to highways and private.*

*Work No. 8: Landscape and Ecology.'*

The provision of a dual carriageway for a distance of 6.5 kilometres (approximately 4 miles) to provide two traffic lanes in both directions.

3.3. Paragraph 5.4.3 sets out and defines additional associated development which within the order limits which includes:

- Fencing, gates, boundary treatment and other means of enclosure.
- Bunds, embankments, trenching and swales.
- Works to the existing irrigation system and works to alter the position and extent of such irrigation system.
- Surface water drainage systems, storm water attenuation systems including storage basins, oil water separators, including channelling and culverting and works to existing drainage networks.
- Electrical, gas, water, foul water drainage and telecommunications infrastructure connections, diversions and works to, and works to alter the position of, such services and utilities connections.
- Works to alter the course of, or otherwise interfere with, non-navigable rivers, streams, or watercourses.
- Works for the provision of security and monitoring measures such as CCTV columns, security cabins, lighting columns and lighting, cameras, lightning protection masts and weather stations.
- Improvement, maintenance, repair and use of existing streets, private tracks, and access roads.
- Laying down, maintenance and repair of new internal access tracks, ramps, means of access, footpaths, permissive paths, cycle routes and roads, crossings of drainage ditches and watercourses, including signage and information boards.
- Temporary footpath diversions and closures.
- Noise, landscaping and biodiversity mitigation and enhancement measures including planting and acoustic barriers.
- Tunnelling, boring and drilling works.
- Earthworks, site establishments and preparation works including site clearance (including vegetation removal, demolition of existing buildings and structures); earthworks (including soil stripping and storage and site levelling) and excavations; the alteration of the position of services and utilities; and works for the protection of buildings and land; and
- other works to mitigate any adverse effects of the construction, maintenance, operation or decommissioning of the authorised development.

## 4. Site description

- 4.1. The Order Limits area covers a significant proportion of land in 3 district council areas. The parts of the site (within the Order Limits) that lie within the administrative area of NSDC, are considered and described below, followed by an overview of the wider Newark and Sherwood District.
- 4.2. The existing site comprises of land to the east of the River Trent and includes land in and around the settlements of North Clifton, South Clifton, and Thorney, with the areas of Spalford and Wigsley being more distant from the boundaries of the Order Limits.
- 4.3. North Clifton is one of the northernmost settlements within Newark & Sherwood District, close to the border with West Lindsey. North Clifton village itself is built up around High Street and Silver Street and situated less than 1km east of the River Trent and approximately 0.3km west of the A1133. This is the main road passing through Collingham and connects the A57 (north) to the A46 (south).
- 4.4. South Clifton is located (as the name suggests) to the south of North Clifton and the two villages are approximately 1 mile apart from the outer edge of each of the settlements, but with North Clifton Primary School being approximately equidistant between the two villages, thereby serving both these settlements and the surrounding villages of Wigsley, Spalford and Thorney.
- 4.5. Other than the Primary School and the Coronation Hall and Sports Pavilion within South Clifton, both settlements have little in the way of other services and amenities and an irregular bus service, with both villages comprising small settlements, in a more tranquil and relatively isolated part of the district.
- 4.6. The two settlements of North Clifton and South Clifton are enclosed in a corridor to the west by the River Trent and to the east by the A1133 and other than the villages themselves, there is little in the way of 'built' development occupying this corridor, providing for a largely open context, that forms an attractive area of open countryside in the wider surroundings.
- 4.7. South Clifton falls within a Conservation Area<sup>2</sup> that captures the significant proportion of the village. Both South Clifton and North Clifton have a number of listed buildings (alongside Thorney) with the most important of these within the two settlements being the Grade II\* Church of St George<sup>3</sup>.

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<sup>2</sup> [South Clifton Conservation Area](#) Last accessed 23/06/2025

<sup>3</sup> [CHURCH OF ST GEORGE, North Clifton - 1046053 | Historic England](#) Last accessed 23/06/2025

- 4.8. Thorney lies to the north eastern side of the district and is small linear settlement, that like North Clifton and South Clifton is significantly residential in respect of the prevailing land use. Whilst Thorney is not located within a conservation area, similarly to North and South Clifton, it supports a number of listed buildings and also has very limited services and amenities within the village.

## **5. Information on Newark and Sherwood and the surrounding area**

- 5.1. The settlement of Newark on Trent is the main settlement within the District of Newark and Sherwood and is located along the navigable River Trent. The District of Newark and Sherwood, at over 65,000 ha, is the largest in Nottinghamshire and is situated in the northern part of the East Midlands Region.
- 5.2. Adjoining the District to the west are the Nottingham and Mansfield conurbations; whilst Lincoln lies to the north-east and Grantham to the south-east.
- 5.3. In Newark and Sherwood, the population size has increased by 7.0%, from around 114,800 in 2011 to 122,900 in 2021<sup>4</sup> (Office for National Statistics, 2024) This is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800. Nearby Districts of Rushcliffe, North Kesteven and South Kesteven have seen population increases by around 7.1%, 9.5% and 7.2% respectively, while others such as Gedling saw an increase of 3.3% and Melton 2.8%. In Newark and Sherwood between 2011 to 2021 there has been an increase of 26.7% in people aged 65 years and over living in the District, an increase of 2.9% in people aged 15 to 64 years and an increase of 1.3% on children aged under 15 years. The largest increase is people between 70 to 74 years at 47%.
- 5.4. The settlement pattern of the District is dispersed, given its large rural nature, and ranges from market towns and large villages to smaller villages and hamlets. Newark, Southwell, Ollerton and Boughton act as a focus for their own communities and those in the wider area, whilst the larger villages function in a similar role for their immediate rural areas. Outside of this however, services are limited, and some higher level and specialist facilities are only found in larger urban areas adjoining the District. Public transport services are limited outside of the main centres and routes, and as a result accessibility to employment and services is more difficult in rural areas, making the use of a private car more preferable.
- 5.5. The District's economy supported 65,400 people aged 16 and over in employment in the year ending December 2023. This is up from the previous year when there were 60,600 people who were employed. However, of people living in the District aged between 16 to

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<sup>4</sup> <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000175/> Last accessed 23/06/2025



64 years, 77.5% were employed in the year ending December 2023. This is a decrease of the previous year when it was 79.0%. Unemployment has however risen to 3.7% which is comparable to the East Midlands as a whole (Office for National Statistics, 2024)<sup>5</sup>.

- 5.6. Key to the District's distinctiveness is its rich and diverse natural and built heritage, reflected in the unspoilt and open countryside and many traditional settlements. The District has an outstanding built heritage with 1,397 listed buildings, 47 Conservation Areas and a wealth of other heritage assets. Complementing the built environment are a number of sites important in nature conservation and biodiversity terms. The River Trent, and its associated floodplain, along with the remnants of the historic Sherwood Forest are the two most dominant landscape features within the District.
- 5.7. The distinctive character is integral to the District's significant tourism appeal, with on average 466,250<sup>6</sup> visitors were recorded as having visited Newark in 2023. The District's historical heritage and especially the attractive Market Town or Newark, is an attractive destination with the Castle (partially destroyed in the English Civil War), National Civil War Centre, traditional Market Place, buildings of special architectural or historical interest and an extensive Conservation Area.
- 5.8. In terms of connectivity, Newark is well placed to provide quick rail links to wider settlements such as London, Leeds, Edinburgh, and Nottingham due to its two stations providing both north to south (East Coast Main Line) and east to west connections. A central bus station located within the town is a hub for the connections on the extensive bus network. To the east of the Newark settlement is the A1(T) which provides the main road connection north and south with links east provided via the A17 connection and the A46(T) also joining this connection. The A46(T) is a key link from the Humber ports to Tewkesbury.

## **6. Planning History (Cumulative Effects)**

- 6.1. Cumulative Effects are presented within Chapter 18 (Cumulative Effects) of the Environmental Statement. The Applicant have been in contact with the Council gathering information on consented developments in the Order Limits area and those allocated as part of the Development Plan. The projects that have been subject to assessment are displayed within Table 18.3 (Inter-Project Cumulative Effects Assessment). As part of its relevant representations and response to the Applicant's Statutory Consultation, NSDC have highlighted specific concerns around cumulative impacts and there is currently disagreement on those schemes that should be subject to further assessment. NSDC are a 'host' authority for four NSIP Projects and one Electricity Act Project and there are a

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<sup>5</sup> <https://www.ons.gov.uk/visualisations/labourmarketlocal/E07000175/> Last accessed 23/06/2025

<sup>6</sup> <https://www.newark-sherwooddc.gov.uk/media/newark-and-sherwood/images-and-files/strategies-and-policies/pdfs/Visitor-Economy--Strategy-2020-23---FINAL.pdf> Last accessed 23/06/2025

number of other NSIP projects located within neighbouring authority areas in both Nottinghamshire and Lincolnshire, alongside other major energy and other projects that are determined at the local level. As such, we consider it imperative that a robust approach be undertaken to the assessment of cumulative effects.

- 6.2. The potential for significant adverse effects, as a result of cumulative effects, remains a key concern for NSDC and we will continue to make representations on this point, throughout the examination period.

## 7. Legislative and Policy Context

### National Policy Statements

- 7.1. In accordance with Part 3, sections 14(1)(a) and 15 of the 2008 Planning Act, the One Earth Solar Farm is classed as a 'nationally significant infrastructure project' (NSIPs). In accordance with the 2008 Planning Act, NSDC has been invited to submit a local impact report (LIR) giving details of the likely impact of the proposed development on the authority's area. The definition of an LIR is given in s60(3) of the Act as 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.
- 7.2. Local authorities are identified as consultation bodies under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in accordance with s43 of the PA 2008 (Planning Act 2008 Section 43(1) and (3)).
- 7.3. The One Earth DCO application was accepted for examination by the Examining Authority on 27<sup>th</sup> March 2025. As such, NSDC note that in accordance with Section 104 (2) (a) of the Planning Act, the Secretary of State (SoS) must have regard to a National Policy Statement (NPS) where it has effect, which in the case of this project comprises of the Overarching National Policy Statement for Energy (EN-1)<sup>7</sup> and the National Policy Statement for Renewable Energy Infrastructure (EN-3)<sup>8</sup>.
- 7.4. NSDC note that the SoS must also have regard to any Local Impact Report (providing it is submitted in accordance with the set deadline) in accordance with Section 104 (2) (b) of the Planning Act in making its decision. NSDC note the Government Guidance on NSIP Projects: Advice for Local Authorities<sup>9</sup> states under the recommended content that:

*'There is no need to undertake an assessment of compliance with an NPS. This assessment will be carried out by the Examining Authority.'*

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<sup>7</sup> [EN-1 Overarching National Policy Statement for Energy](#) Last accessed 23/06/2025

<sup>8</sup> [National Policy Statement for renewable energy infrastructure \(EN-3\)](#) Last accessed 23/06/2025

<sup>9</sup> [Nationally Significant Infrastructure Projects: Advice for Local Authorities - GOV.UK](#) Last accessed 23/06/2025

- 7.5. Accordingly, the following section sets out the prevailing policy framework in place at the local level, with brief reference for context purposes to other national planning policy and relevant guidance, where it is deemed relevant to NSIP projects.

#### National Planning Policy Framework (NPPF), NPPG and Written Ministerial Statements

- 7.6. The National Planning Policy Framework<sup>10</sup> (NPPF) was first published in 2012 and updated in 2018, 2019, 2021, 2023, 2024 and most recently on the 7<sup>th</sup> February 2025. Paragraph 5 of the NPPF states that the document does not contain specific policies for NSIPs. These are to be determined in accordance with the decision-making framework set out in the Planning Act and relevant National Policy Statements (NPS) for nationally significant infrastructure, as well as any other matters that are considered both important and relevant (which may include the NPPF).
- 7.7. Other statements of government policy may also be material when deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.
- 7.8. Whilst the NPPF is not used to determine DCO applications, there are elements which relate to various elements of the One Earth Solar scheme, such as, Achieving Sustainable Development (Part 2), Climate Change and Flooding (Part 14), the Natural Environment (Part 15), Historic Environment (Part 16).
- 7.9. In terms of the economy, the NPPF indicates that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure or a poor environment.
- 7.10. National Planning Policy Guidance (NPPG) provides more detailed guidance to support policies in the NPPF. The following matters are covered by the NPPG and are considered relevant to the One Earth Scheme:
- Air quality.
  - Noise.
  - Biodiversity Net Gain.
  - Climate Change.
  - Design.
  - EIA.
  - Flood risk.
  - Healthy and Safe Communities.
  - Historic Environment.
  - Land affected by Contamination.

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<sup>10</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2> last accessed 23/06/25

- Natural Environment.
- Open Space and public rights of way.
- Tree preservation areas and trees in conservation areas.
- Water supply, wastewater, and water quality.

To summarise, NPSs provide the predominant policy context; and whilst the applicant's DCO application has cross referred to the NPPF and NPPG where applicable, where there are any inconsistencies between the NPPF and the relevant NPSs, it is policies within the latter that prevails. This report has not sought to come to a balanced judgement on the policy context but will provide a local policy perspective for the Examining Authority to consider.

### **Newark and Sherwood Local Development Framework**

#### **Newark and Sherwood Amended Core Strategy (2019)**

7.11. Newark Local Development Framework (LDF) is made up of two development plan documents, the Amended Core Strategy (2019) and the Allocations and development management development plan document (2013). Newark and Sherwood Amended Core Strategy (ACS), adopted in March 2019, provides the Strategic planning policies which provide the framework for the delivery of sustainable development in the district. Appendix D of the Amended Core Strategy identifies A46 Newark Bypass upgrades as a project required to support the delivery of the Newark and Sherwood Amended Core Strategy. The following ACS policies are relevant to the A46 Newark Bypass scheme.

#### *Relevant Policies:*

<b>Amended Core Strategy Policy</b>	<b>Summary of relevant aspects of the policies</b>
Spatial Policy 1: Settlement Hierarchy	<p>This policy defines Newark as a Sub Regional Centre.</p> <p>Features - Major centre in the Sub-Region, containing services and facilities for the District.</p> <p>Function - To be the focus for housing and employment growth in Newark &amp; Sherwood and the main location for investment for new services and facilities within the District. The Sub-Regional Centre is defined as Newark Urban Area which is made up of Newark, Balderton and Fernwood.</p>
Spatial Policy 2: Spatial Distribution of Growth	<p>Newark Urban Area will be the main location for new housing and employment growth in the District. Newark Town Centre will act as a focus for new retail, cultural and leisure development. To support such growth the District Council and its partners will work together to secure and provide new infrastructure, facilities, and services.</p>

Spatial Policy 3: Rural Areas	Sets out that the rural economy will be supported by encouraging tourism, rural diversification, and by supporting appropriate agricultural and forestry development. The countryside will be protected and schemes to enhance heritage assets, to increase biodiversity, enhance the landscape and, in the right locations, increase woodland cover will be encouraged. Beyond Principal Villages, new development will be considered against the criteria of location, scale, need, impact, and character, noting that development in the open countryside will be strictly controlled and restricted to uses that require a rural setting.
Spatial Policy 5: Delivering the Strategy	To ensure that the housing and employment needs of the District are delivered over the plan period, sufficient sites have been allocated to more than meet the requirements. There are three large urban extensions in Newark which, combined, will deliver approximately 7500 new homes and associated infrastructure (Middlebeck to the south, Fernwood to the south east, and Land east of Newark).
Spatial Policy 6: Infrastructure for Growth	To ensure the delivery of infrastructure to support growth in the District, the District Council will secure Strategic Infrastructure via its Community Infrastructure Levy. Strategic Infrastructure is defined as improvements to the strategic highway network and other highway infrastructure as identified within the IDP and secondary education provision across the District; Local Infrastructure, including facilities and services that are essential for development to take place on individual sites, will be secured through Planning Obligations.
Spatial Policy 7: Sustainable Transport	<p>Sets out the Council's commitment to work with Nottinghamshire County Council and National Highways to reduce the impact of roads and traffic movement and support alternative transport methods.</p> <p>Safeguarded locations of highway or public transport schemes identified within the Nottinghamshire Local Transport Plan and its implementation plan. The locations of these schemes are identified on the Policies Map.</p> <p>High quality, safe, cycle, footpath and bridleway networks will be safeguarded and extended to provide opportunities to reduce the number of short car journeys and for cycling, walking and horse riding for recreation in the countryside. Highway improvements which harm the character and environment of the area will be avoided and effective parking provision and vehicular servicing arrangements should be provided in accordance with</p>

	Highways Authority best practice. Development proposals should ensure that vehicle traffic generated does not create or exacerbate existing on street car parking problems, nor materially increase other traffic problems.
Core Policy 6: Shaping our Employment Profile	The economy of Newark and Sherwood District will be strengthened and broadened to provide a diverse range of employment opportunities, through a variety of measures. This includes Working with learning and training bodies, job centres and higher education providers to raise workforce skill levels, improve employability and supporting economic development associated with these sources, and using planning obligations to provide opportunities to assist residents in accessing work.
Core Policy 9: Sustainable Design	The District Council will expect new development proposals to demonstrate a high standard of sustainable design that both protects and enhances the natural environment and contributes to and sustains the rich local distinctiveness of the District.
Core Policy 10: Climate Change	<p>The District Council is committed to tackling the causes and impacts of climate change and to delivering a reduction in the District's carbon footprint. The District Council will work with partners and developers to:</p> <ul style="list-style-type: none"> <li>• Promote energy generation from renewable and low-carbon sources, including community-led schemes, through supporting new development where it is able to demonstrate that its adverse impacts have been satisfactorily addressed. Policy DM4 'Renewable and Low Carbon Energy Generation' provides the framework against which the appropriateness of proposals will be assessed;</li> <li>• Ensure that development proposals maximise, where appropriate and viable, the use of available local opportunities for district heating and decentralised energy;</li> <li>• Mitigate the impacts of climate change through ensuring that new development proposals minimise their potential adverse environmental impacts during their construction and eventual operation. New proposals for development should therefore:</li> <li>• Ensure that the impacts on natural resources are minimised and the use of renewable resources encouraged; and</li> </ul>

	<ul style="list-style-type: none"> <li>• Be efficient in the consumption of energy, water, and other resources.</li> <li>• Steer new development away from those areas at highest risk of flooding, applying the sequential approach to its location detailed in Policy DM5 'Design'. Where appropriate the Authority will seek to secure strategic flood mitigation measures as part of new development;</li> <li>• Where appropriate having applied the Sequential Test move on to apply the Exceptions Test, in line with national guidance. In those circumstances where the wider Exceptions Test is not required proposals for new development in flood risk areas will still need to demonstrate that the safety of the development and future occupants from flood risk can be provided for, over the lifetime of the development; and</li> <li>• Ensure that new development positively manages its surface water run-off through the design and layout of development to ensure that there is no unacceptable impact in run-off into surrounding areas or the existing drainage regime.</li> </ul>
Core Policy 12: Biodiversity and Green Infrastructure	The Policy sets out how the District Council will seek to conserve and enhance the biodiversity and geological diversity of the District by working with partners to implement the aims and proposals of the Nottinghamshire Local Biodiversity Action Plan, the Green Infrastructure Strategy, and the Nature Conservation Strategy.
Core Policy 13: Landscape Character	This policy sets out, based on the comprehensive assessment of the District's landscape character, provided by the Landscape Character Assessment Supplementary Planning Document, the District Council will work with partners and developers to secure new development which positively addresses the implications of relevant landscape Policy Zone(s) that is consistent with the landscape conservation and enhancement aims for the area(s) ensuring that landscapes, including valued landscapes, have been protected and enhanced.
Core Policy 14: Historic Environment	Newark & Sherwood has a rich and distinctive historic environment, and the District Council will work with partners and developers in order to secure the continued conservation and enhancement of the character, appearance and setting of the District's heritage assets and historic environment, in line with their identified significance as required in national policy.

	There are several heritage assets, including one Conservation Area, within close proximity of the Order Limits (South Clifton Conservation Area).
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#### Newark and Sherwood Allocations and Development Management DPD (2013)

7.12. Adopted in July 2013, the Allocations & Development Management DPD (ADMDPD<sup>11</sup>) forms part of the Local Development Framework and accords with the 2011 Newark and Sherwood Core Strategy and its approach to settlement growth in identifying specific sites where new homes and employment sites should be built. The DPD illustrates the location and extent of the allocated land on the Policies Map and provides guidance on how and when the sites should be developed. This DPD has been subject to review in recent times to ensure its policies accord with the Amended Core Strategy (2019) and National Planning Policy Framework.

#### *Relevant policies:*

<b>Policy</b>	<b>Summary of relevant aspects of policy</b>
DM4: Renewable and Low Carbon Energy Generation	<p>This policy sets out that in order to achieve the carbon reduction as set out in Core Policy 10, planning permission will be granted for low carbon energy generation development, where its benefits are not outweighed by detrimental impact upon:</p> <ul style="list-style-type: none"> <li>• Landscape character (arising from individual or cumulative impacts).</li> <li>• Heritage assets and or their settings.</li> <li>• Amenity, including noise pollution, shadow flicker and electro-magnetic interference.</li> <li>• Highway safety.</li> <li>• The ecology of the local or wider area.</li> <li>• Aviation interests of local or national importance.</li> </ul>
DM5: Design	<p><u>Amenity</u></p> <p>The layout of development within sites and separation distances from neighbouring development should be sufficient to ensure that neither suffers from an unacceptable reduction in amenity including overbearing impacts, loss of light and privacy. Development proposals should have regard to their impact on the amenity or operation of surrounding land uses and where necessary</p>

<sup>11</sup> <https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/planning-policy/supplementary-planning-information/allocations-and-development-management-dpd/Allocations-and-Development-Management-Development-Plan-Document.pdf> last accessed 23/06/2025



	<p>mitigate for any detrimental impact. Proposals resulting in the loss of amenity space will require justification.</p> <p>The presence of existing development which has the potential for a detrimental impact on new development should also be taken into account and mitigated for in proposals. New development that cannot be afforded an adequate standard of amenity or creates an unacceptable standard of amenity will be resisted.</p> <p><u>Local Distinctiveness and Character</u></p> <p>The rich local distinctiveness of the district's landscape and character of built form should be reflected in the scale, form, mass, layout, design, materials and detailing of proposals for new development. In accordance with Core Policy 13, all development proposals will be considered against the assessments contained in the Landscape Character Assessment Supplementary Planning Document.</p> <p><u>Trees, Woodlands, Biodiversity &amp; Green Infrastructure</u></p> <p>In accordance with Core Policy 12, natural features of importance within or adjacent to development sites should, wherever possible, be protected and enhanced. Wherever possible, this should be through integration and connectivity of the Green Infrastructure to deliver multi-functional benefits.</p> <p><u>Ecology</u></p> <p>Where it is apparent that a site may provide a habitat for protected species, development proposals should be supported by an up-to date ecological assessment, including a habitat survey and a survey for species listed in the Nottinghamshire Biodiversity Action Plan. Significantly harmful ecological impacts should be avoided through the design, layout and detailing of the development, with mitigation, and as a last resort, compensation (including off-site measures), provided where significant impacts cannot be avoided.</p> <p><u>Unstable Land</u></p> <p>Development proposals within the current and historic coal mining areas of the district should take account of ground conditions, land stability and mine gas, and where</p>
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	<p>necessary include mitigation measures to ensure they can be safely implemented.</p> <p><u>Flood Risk and Water Management</u></p> <p>Development proposals within Environment Agency Flood Zones 2 and 3 and areas with critical drainage problems will only be considered where it constitutes appropriate development and it can be demonstrated, by application of the Sequential Test, that there are no reasonably available sites in lower risk Flood Zones.</p> <p>In accordance with the aims of Core Policy 9, development proposals should wherever possible include measures to pro-actively manage surface water including the use of appropriate surface treatments and Sustainable Drainage Systems.</p>
DM7: Biodiversity and Green Infrastructure	<p>The policy requires development to protect, promote and enhance biodiversity and the ecological network of habitats, species, and sites of international, national, and local importance. Development proposals in all areas of the District should seek to enhance biodiversity. Proposals should take into account the latest information on biodiversity including Nottinghamshire Biodiversity Opportunity Mapping, and the forthcoming Local Nature Recovery Strategy.</p>
DM8: Development in the Open Countryside	<p>In accordance with the requirements of Spatial Policy 3, development away from the main built-up areas of villages, in the open countryside, will be strictly controlled and limited to specific types of development, which includes (amongst others) rural diversification, equestrian uses, tourism uses, community and leisure facilities, employment uses, agricultural and forestry development.</p>
DM9: Protecting and Enhancing the Historic Environment	<p>In accordance with the requirements of Core Policy 14, all development proposals concerning heritage assets will be expected to secure their continued protection or enhancement, contribute to the wider vitality, viability, and regeneration of the areas in which they are located and reinforce a strong sense of place.</p> <p>All development proposals affecting heritage assets and their settings, including new operational development and alterations to existing buildings, where they form or affect heritage assets should utilise appropriate siting, design, detailing, materials, and methods of construction. Particular attention should be paid to reflecting locally</p>

	distinctive styles of development and these should respect traditional methods and natural materials wherever possible. Where development proposals requiring planning permission involve demolition, the resulting impact on heritage assets will be assessed under this policy.
DM10: Pollution and Hazardous Materials	Development proposals involving the potential for pollution should take account of and address their potential impacts in terms of health, the natural environment and general amenity on: <ul style="list-style-type: none"> <li>• Neighbouring land uses.</li> <li>• The wider population.</li> <li>• Ground and surface water.</li> <li>• Air Quality.</li> <li>• Biodiversity.</li> </ul>
DM12: Presumption in Favour of Sustainable Development	A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work pro-actively with applicants jointly to seek solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social, and environmental conditions within the district.

Newark and Sherwood Amended Allocations and Development Management DPD Submission (2024)<sup>12</sup>

7.13. Following a review of the ADMDPD (2013), the Amended Allocations & Development Management DPD (AADMDPD), along with its supporting documents has now been submitted for examination to the Secretary of State. The Submission Version of the Plan was approved at NSDC Full Council on 12th December 2023 with the recommendation to submit the Plan to the Secretary of State which was done so on 18th January 2024. The examination is currently ongoing, with a series of Hearings that took place in November 2024. In respect of next steps, the council are awaiting a response from the appointed Inspector following the submission of additional information.

*Relevant Policies:*

<sup>12</sup> <https://www.newark-sherwooddc.gov.uk/aadm-represenatation/> Amended Allocations Document last accessed 23/06/2025

<b>Policy</b>	<b>Summary</b>
DM4: Renewable and Low Carbon Energy Generation	The main provisions of this policy as within the current ADMDPD are proposed to be carried forward with support for low energy carbon developments, sets out where its benefits are not outweighed by detrimental impacts, which continues to include those issues as identified within the current version of policy DM4.
DM5(b): Design	This policy sets out criteria to be used to assess planning applications against design principles set out in the National Design Guide and any local Design Codes. Of particular relevance are the aspects relating to amenity, local distinctiveness and character, Trees, Biodiversity and Green and Blue Infrastructure, ecology, flood risk and water management.
DM7: Biodiversity and Green Infrastructure	The policy requires development to protect, promote and enhance biodiversity and the ecological network of habitats, species, and sites of international, national, and local importance. Development proposals in all areas of the District should seek to enhance biodiversity. Proposals should take into account the latest information on biodiversity including Nottinghamshire Biodiversity Opportunity Mapping, and the forthcoming Local Nature Recovery Strategy. Except for exempt development proposals, the enhancement should be a net gain of at least 10% (or if different, the relevant percentage set out in the Environment Act) as measured by the applicable DEFRA metric or any successor document. These gains must be guaranteed for a period of at least 30 years.
DM8: Development in the Open Countryside	In accordance with the requirements of Spatial Policy 3, development away from the main built-up areas of villages, in the open countryside, will be strictly controlled and limited to specific types of development, which includes (amongst others) rural diversification, equestrian uses, tourism uses, community and leisure facilities, employment uses, agricultural and forestry development.
DM9: Protecting and Enhancing the Historic Environment	All development proposals concerning heritage assets will be expected to conserve them in a manner appropriate to their significance, contribute to the wider vitality, viability and regeneration of the areas in which they are located (including its contribution to economic vitality), reinforce a strong sense of place and be enjoyed for their

	contribution to the quality of life of existing and future generations.
Policy DM10: Pollution and Hazardous Materials	<p>This policy continues to set out that proposals involving the potential for pollution should take account of and address their potential impacts in terms of health, the natural environment and general amenity on:</p> <ul style="list-style-type: none"> <li>• Neighbouring land uses.</li> <li>• The wider population.</li> <li>• Ground and surface water (including a new reference to water courses and water quality).</li> <li>• Air Quality.</li> <li>• Biodiversity.</li> </ul>
DM12: Presumption in Favour of Sustainable Development	A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work pro-actively with applicants jointly to seek solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social, and environmental conditions within the district.

## 8. Landscape and Visual Impacts (Including Residential Amenity) – *Neutral to Negative (depends on the landscape character area)*

### Landscape and Visual Impact Assessment (LVIA) Methodology

- 8.1. The LVIA Methodology is presented in section 11.3 of the LVIA and *Appendix 11.2: Landscape and Visual Impact Assessment Methodology*. Reference is made in section A.11.1.4 of Appendix 11.2 to best practice and industry guidance, including GVLIA3 and reference to *Notes and Clarifications on aspects of GLVIA 3, LI TGN-2024-01, Landscape Institute*. It clarifies in Section A.11.2.1. compliance with GVLIA3 by assessing both **landscape effects** and **visual effects** as interrelated but separate components.
- 8.2. The process and stages of assessment are clearly presented, including a baseline assessment, the detailing and review of the design, assessment of sensitivity (by assessing value and susceptibility), an assessment of magnitude of impact (in relation to size, scale, geographical extent, duration and reversibility) of the Development on the baseline conditions, and a determination of the significance of effects at all phases of the scheme (construction, year 1, year 15 (winter and summer as applicable) and decommissioning).

- 8.3. The study area selection and establishment are explained in detail within paragraphs 11.3.2 to 11.3.9 of the LVIA. The Study area is illustrated in Figure 11.1. The radius of the study area of 2km from the Order Limits has been defined for the LVIA, which is a reduced area to that initially used, which is defined as a 5km Area of Search as shown on Figures 11.3 to 11.6. The process and rationale of reducing the initial 5km Area of Search to 2km is laid out in paragraph 11.3.5, providing appropriate justification and paragraph 11.3.8 clarifies that it is judged that “Beyond the 2 km distance, there would not be significant adverse landscape and visual effects due to the intervening distance and vegetation patterns.”. We have not identified anything on Site that would contradict the statement that there would not be Significant effects beyond 2km, and typically distance reduces the likelihood of this occurring. However, at the construction phase (and potentially operation with maintenance and replacement operations) traffic movement to and from the Site may have effects beyond 2km and it is not clear as to whether this has been considered. This needs to be clarified by the applicant.
- 8.4. The baseline conditions (from paragraph 11.3.10) have been determined following a mix of desk and field studies alongside consultation with appropriate consultees. Desk research has included the prevailing policy framework and fieldwork carried out by Chartered landscape architects.
- 8.5. The methodology in Appendix 11.2 is clear, with paragraphs A.11.2.12 to A.11.2.31 covering landscape effects and paragraphs A.11.3.1 to A.11.3.20 covering visual effects. Section A.11.4 of Appendix 11.2 clarifies how the level or significance of landscape and visual effects are determined by combining judgements regarding the sensitivity of the receptor and the magnitude of the effect arising from the Development.
- 8.6. Tables within the methodology provide criteria for assessment of value, and susceptibility, and subsequently how these have been combined to provide a judgement on sensitivity. These tables provide clear indicative criteria of the assessment of landscape and visual value, susceptibility, sensitivity, and magnitude of effects. The utilisation of professional judgement is promoted within the methodology, should an effect be different to that presented within the tables.
- 8.7. The assessment methodology has been carried through into the main assessment and used consistently.
- 8.8. The assumptions made on plant growth rates in Section 11.3.40 are generally acceptable, however we would state these are at the higher end of the scale as to what we would deem acceptable for a fifteen-year period: fifteen years being the period that residual effects have been assessed in the LVIA. We would query as to whether the plant growth rates allow for issues during the establishment period and allow for any plant replacements to be carried out along with planting establishing should there be plant failures or lack of acceptable growth. These plant growth rates are dependent upon the

successful implementation of a robust and well considered OLEMP, which is covered in further sections of this review.

- 8.9. Given the stated operational time of 60 years, there is a concern regarding the assumptions of reversibility and duration. Having reviewed the sections relating to this from GLVIA3 and other related guidance, it is clear that this project is long term. Given that 60 years is comparable to at least two generations, there is some considerable strength to the consideration that this would amount to a permanent project, as opposed to a temporary one, especially considering the average lifespan of building design is circa 50 years. If deemed a permanent Development, which it is our position, this is likely to have a bearing on the judgements of effects, as typically a temporary scheme reduces the magnitude of a change. Therefore, the majority of judgements on longer term effects (15 years+) need to be re-visited and adjusted so as to be permanent, and not partly reversible.
- 8.10. We would also recommend that the applicant consider fully that in this 60-year timescale, the panels, inverters, batteries, and other associated elements will be replaced. It is stated in the ES within Table 5.5 Indicative Design Life of Chapter 5 that this would likely be once for panels, however Inverters and batteries may be more regularly. Also, given the pace of technology, it should be considered if it is likely that the panels could be replaced on numerous occasions. At this stage we would need additional information regarding the phases of replacements in order to consider whether there is one single construction stage or a series of staged re-construction stages, and activity and deliveries, potentially of large-scale equipment, be for the life of the scheme.

### **ZTV Methodology**

- 8.11. The process of modelling Zones of Theoretical Visibility (ZTVs) and subsequent presentation on Figures 11.3 to 11.6 is summarised in paras. 11.4.81 to 11.4.88. Para 11.4.82 references Appendix 11.1: Legislation, Policy, and Technical Guidance for a methodology for the ZTVs, however we assume this is an error, and the correct reference should be to Appendix 11.2: Landscape and Visual Impact Assessment (LVIA) Methodology. Within Appendix 11.2, a methodology and parameters of the ZTV generation is provided within section A.11.3. The methodology, execution and presentation on Figures 11.3 to 11.6 is acceptable, with elements modelled to their maximum parameters.

### **Visualisation Methodology**

- 8.12. The process of delivering visualisations is presented within paras. A.11.3.9 to A.11.3.12 of Appendix 11.2. This states that they were prepared in accordance with the Landscape Institute TGN 06/19 Visual Representation of Development Proposals. Paragraph A11.3.12 clarifies that photomontages have been presented to the maximum allowed parameter heights, and the proposals modelled and presented using visualisations generated with

the maximum parameters provided within Chapter 5: Description of the Proposed Development, as this would provide a 'worst case' visualisation.

- 8.13. The process of delivering visualisations is presented within paras. A.11.3.9 to A.11.3.12 of Appendix 11.2. This states that they were prepared in accordance with the Landscape Institute TGN 06/19 Visual Representation of Development Proposals. Paragraph A11.3.12 clarifies that photomontages have been presented to the maximum allowed parameter heights, and the proposals modelled and presented using visualisations generated with the maximum parameters provided within Chapter 5: Description of the Proposed Development, as this would provide a 'worst case' visualisation.

#### Landscape Baseline

- 8.14. The Landscape Baseline is considered in section 11.4 of the LVIA, with Figure 11.1 illustrating the Scheme Location, Order limits and 2km Study Area. The Site covers 1,409 hectares of predominantly agricultural land located to the east and west of the River Trent. Located across three local authorities (Bassetlaw, Newark and Sherwood, and West Lindsey), and two counties; however, the majority of the Site is within Nottinghamshire, with approximately 15% of the Order Limits within Lincolnshire.
- 8.15. The baseline follows the LVIA methodology and begins by identifying baseline landscape characteristics, as well as relevant designations, of the study area and the Site. This is summarised in the LVIA chapter and further detail is provided in Appendix 11.3: Landscape Baseline and Effects. Paragraphs 11.4.2 to 11.4.18 provide a narrative on the existing landscape baseline of the Site, with paragraphs 11.4.19 to 11.4.39 covering the Study Area.
- 8.16. The LVIA acknowledges the low lying and gently undulating, agricultural and open character of the Site and Study area.
- 8.17. Published landscape character assessments are considered from paragraphs 11.4.40 to 11.4.67 and illustrated in Figures 11.17a (Regional – Greater Nottingham), 11.17b (Regional – East Midlands), and 11.18 (District - Greater Nottingham), with further detail provided in Appendix 11.3: Landscape Baseline and Effects. We have assumed the author acknowledges that the Site and Study Area reflect the boundaries and characteristics of the published character assessments, however a clear statement on this would clarify.
- 8.18. The Future baseline is covered in paras. 11.4.147 and 11.4.148. The Development of solar farm projects in the area is acknowledged to be a factor in the future baseline, although this feels underplayed within the LVIA. This is a landscape undergoing extensive change to land-use, predominantly changing from agriculture to large scale solar Development. While at the time of writing no other schemes were identified within the 2km Study Area, we have concerns regarding effects on the national, county, and regional landscape character areas. The mass and scale of these projects combined has the potential to lead



to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing multiple schemes across potentially several kilometres, albeit with gaps between some of the projects. However repeated views and presence of large scale solar would combine over time to create a greater perception of change.

- 8.19. To calibrate this change to the landscape, these schemes combined, if built, would clearly require the update of any published landscape character assessment, including at a national level (NCA's), so as to include large scale solar as a defining land use characteristic as well as agriculture. This is a clear and marked change to landscape character, and several schemes have already been approved, with many in the planning system. It should also be noted that other renewable and energy infrastructure projects (such as Solar, BESS, Hydrogen, Pylons, and cables along with associated infrastructure) are planned in the region, including NSIP and DCO schemes as well as Town and Country Planning Act scale projects. These will all combine to change the character of the wider landscape.
- 8.20. The LVIA contains a local village landscape character assessment, as shown on Figure 11.9: Local Village Character Areas, with detailed information provided within Appendix 11.3: Landscape Baseline and Effects. This covers an assessment of the character of 17 villages, along with their settings. It is unclear as to whether the LVIA author judged the villages were not adequately covered by published character assessment, or if it was felt through more recent developments these needed to be updated, however this additional information provides a more rounded baseline and understanding of these settlements.
- 8.21. This baseline process, undertaken by the applicant, resulted in several landscape receptors for the assessment of effects on them by the Development. These are presented in Table 11.8 and include a variety of scales. NCA 48 has been scoped out of further assessment, which we agree with as these large national character areas are often best used for context. Table 11.8 summarises an assessment of Landscape Value, Susceptibility and subsequently Sensitivity of all identified receptors. Further detail of the landscape baseline, and judgements of Landscape Value, Susceptibility and Sensitivity is contained within Appendix 11.3.

### **Landscape Assessment**

- 8.22. The Landscape Assessment is detailed within section 11.6 of the LVIA, which refers to Appendix 11.3: Landscape Baseline and Assessment, which includes a clear assessment of Value and Susceptibility, and subsequently the Sensitivity of the landscape receptors, which is aligned with the criteria provided within the methodology. The landscape

assessment commences with construction effects at para. 11.6.2, with Year 1 of Operation Landscape Effects at para 11.6.15, and Year 15 Operation Landscape Effects at para. 11.6.27.

8.23. As agreed at the pre-application stage, the National Character Areas have not been assessed and are referred to for context only.

8.24. In line with the methodology, the assessment of the landscape effects considers the change to the identified landscape receptors at construction, operation (both years 1 and 15) and decommissioning. This includes Landscape Character Effects within the Order Limits (which would be direct) and Landscape Effects within Published Landscape Character Areas (which would be both direct and indirect).

8.25. The LVIA identifies Significant landscape effects at the phases of **construction**, **operation (year 1)**, **operation (year 15)**, and **decommissioning** phases. The following effects upon identified landscape receptors are identified in the LVIA:

- At **Construction**, the following receptors were assessed as having the following landscape effects:

- Order Limits: **Major adverse: Significant**.
- ENS PZ 01: North Clifton Village Farmlands: **Moderate adverse: Significant (temporary)**;
- TW PZ 20: Dunham on Trent Village Farmlands: **Major adverse: Significant**
- TW PZ 44: Fledborough Holme River Meadowlands: **Moderate adverse: Significant**.
- MNF PZ 09: East Drayton: **Moderate adverse: Significant**
- MNF PZ 12: Normanton-On-Trent: **Major adverse: Significant**
- LVCA Fledborough: **Major adverse: Significant**
- LVCA North Clifton: **Moderate adverse: Significant**
- LVCA Ragnall: **Moderate adverse: Significant**
- LVCA Skegby: **Moderate adverse: Significant**

- At **Operation (Year 1)** the following receptors were assessed as having the following landscape effects:

- Order Limits: **Major adverse: Significant**.
- ENS PZ 01: North Clifton Village Farmlands: **Moderate adverse: Significant (temporary)**;
- TW PZ 20: Dunham on Trent Village Farmlands: **Major adverse: Significant**
- MNF PZ 09: East Drayton: **Moderate adverse: Significant**
- MNF PZ 12: Normanton-On-Trent: **Moderate adverse: Significant**
- LVCA Fledborough: **Major adverse: Significant**
- LVCA Ragnall: **Moderate adverse: Significant**

- At **Operation (Year 15)** the following receptors were assessed as having the following landscape effects:
    - Order Limits: **Moderate adverse: Significant**
    - TW PZ 20: Dunham on Trent Village Farmlands: **Moderate adverse: Significant**
    - MNF PZ 09: East Drayton: **Moderate adverse: Significant**
    - LVCA Fledborough: **Major neutral: Significant**
    - LVCA Ragnall: **Moderate neutral: Significant**
  - At **Decommissioning**, effects would be similar to those at the construction phase, however, the Site and local landscape will benefit from established planting associated with the scheme.
- 8.26. These 'Significant' effects represent direct effects on the landscape of the entirety of the Site. At year 15, the Order Limits (entirety of the 1,409-hectare Site) has been assessed as having a Significant Residual effect even when mitigation planting has established. The landscape character areas of TW PZ 20: Dunham on Trent Village Farmlands, and MNF PZ 09: East Drayton, as well as LVCA Fledborough and LVCA Ragnall have also been judged by the author as having Significant Residual effects, even when mitigation planting has established.
- 8.27. This accounts for a direct Significant effect on these landscape receptors. This equates to a considerable change to landscape character across an extensive area; introducing a mass of development with industrial characteristics in an open agricultural landscape, affecting the sense of openness, seasonal rhythm of farming practices and rural tranquillity currently experienced.
- 8.28. However, several landscape character areas that will also have direct effects at all phases have not been judged to have Significant residual effects. This appears inconsistent with the findings of effects to the Order Limits and landscape character areas of TW PZ 20 and MNF PZ 09, and we would judge that all landscape character areas directly affected by the Development would have residual Significant effects – primarily through a change of land-use.
- 8.29. Localised removal of vegetation is identified in the assessment of landscape effects; however, it is unclear whether this includes vegetation works on the wider highways network, and what this would entail. We strongly recommend limiting vegetation loss along Site boundaries for access or sight lines, or along construction access routes, because this has the potential to change the character of the local landscape beyond the limits of the Development.

## **Appraisal of Visual Baseline and Effects**

### **Visual Baseline**

8.30. The Visual Baseline is considered in section 11.4 of the LVIA and describes in paragraph 11.4.77 that the primary visual receptors identified in the Study Area likely to be affected by the Development are Residents; Users of PROW; Users of local road network; Users of the River Trent. The process of identifying visual receptors is identified as a two-stage process:

- Stage 1 (as described from para. 11.4.80) is a desk-based assessment which commenced with the Development of a Zone of Theoretical Visibility (ZTV) analysis, used to assist, and identify potentially sensitive receptors.
- Stage 2 (as described from para. 11.4.89) comprises fieldwork across the Site and Study Area utilising the ZTVs generated to identify visual receptors likely to experience views of the construction, operation or decommissioning of the Development and identify and capture representative views (viewpoints).

8.31. Paras. 11.4.92 to 11.4.142 provide a useful overview narrative of the visual baseline, focussing on visual receptors and using reference to the sixty-three representative viewpoints to support the narrative. An overall summary of the visibility of the Site is provided at para. 11.4.144, and Table 11.9 identifies visual receptors for the assessment of effects on them by the Development. While this Table is structured around viewpoints, so potentially in contradiction with recent Landscape Institute (LI) Technical Guidance Note LITGN-2024-01, the viewpoints have been used to identify and group visual receptors, so does provide an appropriate baseline.

8.32. Table 11.9 summarises an assessment of Visual Value, Susceptibility and subsequently Sensitivity of all identified receptors. Further detail of the visual baseline, and judgements of Visual Value, Susceptibility and Sensitivity is contained within Appendix 11.4 Visual Baseline and Assessment.

8.33. The selection of the sixty-three viewpoints formed part of the pre-application consultation and includes locations recommended as part of this process. These viewpoints are presented as baseline photographs within Figure 12 (multiple sheets). The baseline follows the LVIA methodology and considers the consultation undertaken at the pre-application stage.

### **Visualisations/Photomontages**

8.34. Viewpoints representative of the visual receptors was identified through consultation and agreed upon. This baseline process resulted in the identification of eighteen viewpoints to be developed as Type 3 (photomontages) visualisations and presented in Figure 11.13:

Winter Photomontages; and Figure 11.14: Summer Photomontage. A methodology for photography and visualisations is provided in Appendix 11.2: Landscape and Visual Impact Assessment Methodology, which clarifies that the photomontages have been prepared to Landscape Institute's TGN 06/19 .

### Visual Assessment

8.35. The Visual Assessment is detailed within section 11.6 of the LVIA and detailed within Appendix 11.4: Visual Baseline and Assessment. The assessment of value and susceptibility, and subsequently the sensitivity of visual receptors and viewpoints is summarised within the baseline of the LVIA and detailed within Appendix 11.4, which is aligned with the criteria provided within the methodology. A viewpoint analysis has been carried out on the sixty-three viewpoints to inform the assessment of magnitude and significance of residual effects on visual receptors.

8.36. However, we judge that the visual assessment does not fully align with guidance provided within LI Technical Guidance Note LITGN-2024-01. This clarification by the LI clearly states that the focus of a visual assessment should be on visual receptors, with viewpoints being utilised to illustrate potential views. Section 6(7): "Assessing viewpoints or visual receptors?" clarifies:

*"The focus of the visual assessment should be the visual receptors (i.e. the people as set out within paragraph 6.31. of GLVIA3). The purpose of viewpoints is covered at paragraph 6.19 (i.e. for illustration of the visual effects)."*

8.37. The visual assessment only focusses on a static viewpoint for the assessment and does not fully consider the experience of a receptor, such as a walker along a PROW, or driver along a road. The experience and effects will be different depending on the experience, such as traveling along a linear route. The visual assessment does not fully account for this, and if only relying on a static viewpoint and describing the existing view and change to that view, is likely underplaying visual effects. For example, users of public bridleway NT/North Clifton/BW10, will have a varying experience along the route, as well as varying views of the Development. This receptor will have closer range, and likely clearer views of the Development while passing through the south eastern section of the Site, however their visual experience is only captured and described in one static view at Viewpoint 9, which is much further from the built elements, and subsequently likely to have been assessed as having a lesser effect.

8.38. The visual effects of the Development are likely exacerbated when travelling through the area either along PROW or local roads between villages, and the sequential effects of a large-scale solar site, spread over an extensive area, potentially creates the perception of being surrounded by solar development. Frequent sequential views would create a change to the experience of visual receptors as well as change the perception of character of an entire area – these do not necessarily need to be clear open views.

8.39. Therefore, it needs to be clarified as to how sequential views and the experience of the receptor, rather than a static viewpoint, have been fully considered within the LVIA, particularly with the visual assessment being structured around viewpoints.

For further clarity and reference, GLVIA3 defines types of sequential visual effects as either: Combined (in same view) or Sequential. Table 7.1 regarding Cumulative visual effects states:

*“Sequential: Occurs when the observer has to move to another viewpoint to see the same or different developments. Sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths:*

*- Frequently Sequential: Where features appear regularly and with short time lapses between instances depending on speed of travel and distance between viewpoints*

*- Occasionally sequential: Where longer time lapses between appearances would occur because the observer is moving very slowly and/or there are larger distances between viewpoints.”*

8.40. The visual assessment commences with construction effects at para. 11.6.11, with Year 1 of Operation Visual Effects at para 11.6.23, and Year 15 Operation Visual Effects at para. 11.6.35.

8.41. The LVIA identifies Significant visual effects at **the construction, operation (year 1), operation** (year 15), and **decommissioning** phases.

8.42. The following Significant effects are identified in the LVIA, summarised in paragraphs 10.9.55 to 10.9.136 (for construction effects ) and 10.9.194 to 10.9.333 (for operation effects – both year 1 and residual at year 15) within the LVIA:

- At **Construction**:
  - **Major Adverse** (Significant) visual effects for:
    - National Cycle Network (Route 647)
    - Moor Lane;
    - Public bridleway (NT/Darlington/BW1);
    - Public footpath (NT/Ragnall/FP4);
    - North of Ragnall;
    - Public bridleway (NT/Ragnall/BW3).
  - **Moderate Adverse** (Significant) visual effects for:
    - Trent Valley Way;
    - A1133;
    - A57;
    - Public bridleway (NT/North Clifton/BW10);

- Public bridleway (NT/Thorney/BW19);
- Public byway open to all traffic (NT/North Clifton/BOAT9);
- Public footpath (NT/North Clifton/FP4);
- public footpath (NT/Fledborough/FP11);
- Skegby Road;
- Public footpath (BT/Fledborough/FP7);
- Main Street, Fledborough;
- Hollow Gate Lane, Fledborough;
- Public footpath (NT/Ragnall/FP2);
- Public footpath (NT/Darlton/FP8);
- Church of St Leonard Cemetery, Ragnall;
- Public footpath (NT/Darlton/FP2);
- Public footpath (NT/East Drayton/FP3).

8.43. These are typically identified for receptors on the road and PROW network, along with residents of Ragnall, Skegby and nearby farmsteads, such as Moor Farm, which are in close proximity to the Development with limited or absent screening allowing for clear views. These **Moderate and Major Adverse** effects are considered to be Significant and would result from the proposed construction activity seen at close range across a wide extent of a view. No Significant effects at the construction phase have been identified beyond approximately 200 m of the Order Limits.

- **At Operation (Year 1):**
  - **Major Adverse** (Significant) visual effects for:
    - National Cycle Network (Route 647);
    - Moor Lane;
    - Public bridleway (NT/Ragnall/BW3).
  - **Moderate Adverse** (significant) visual effects for:
    - A1133;
    - A57;
    - Public bridleway (NT/North Clifton/BW10);
    - Public bridleway (NT/Thorney/BW19);
    - public footpath (BT/Fledborough/FP7);
    - Hollow Gate Lane, Fledborough;
    - Public bridleway (NT/Darlton/BW1);
    - Public footpath (NT/Ragnall/FP2);
    - Church of St Leonard Cemetery, Ragnall;
    - Public footpath (NT/Darlton/FP2);
    - Public footpath (NT/East Drayton/FP3);
    - North of Ragnall.

8.44. These represent a reduction in receptors experiencing Significant effects and also two receptors (views from receptors from public bridleway (NT/Darlton/BW1), and north of Ragnall) have reduced in the level of Significance: from Major to Moderate adverse. While

there are still several receptors identified as experiencing Significant adverse visual effects from the Development, we would query as to how views that are temporary in nature (at construction) to those of a long term/permanent change are able to reduce, especially as at this stage, any mitigation planting is yet to establish and is subsequently providing limited screening or integration of the Development. This needs to be clarified.

- **At Operation (Year 15):**

- **Major Adverse** (Significant) visual effects for:
  - National Cycle Network (Route 647);
  - Public bridleway (NT/Ragnall/BW3).
- **Moderate Adverse** (Significant) visual effects for:
  - A1133;
  - Public bridleway (NT/North Clifton/BW10);
  - Public bridleway (NT/Thorney/BW19);
  - Moor Lane;
  - Public bridleway (NT/Darlington/BW1);
  - Public footpath (NT/Ragnall/FP2);
  - North of Ragnall.

8.45. These represent a further reduction in receptors experiencing Significant effects through the establishment of mitigation planting over 15 years from planting. The LVIA therefore identifies that several visual receptors will experience Significant adverse effects over the remaining 45 years of the development.

8.46. At **Decommissioning**, effects would be similar to those at the construction phase, however, the Site and local landscape will benefit from established planting associated with the scheme, which would provide screening and integration in views.

8.47. The Development has been identified in the LVIA as resulting in a Significant change to a variety of visual receptors during construction and in the early years of operation and maintenance, with Significant residual visual effects much reduced in number, which suggests a potential over reliance upon mitigation planting to screen the proposals without full attention to the potential impact of this screening on the landscape. These residual Significant effects have been identified as arising from sensitive users on the road and PROW network, along with residents that are in close proximity to the Development. No Significant residual effects have been identified beyond approximately 200 m of the Order Limits. The reduction in Significant visual effects relies upon the successful establishment of the mitigation planting scheme and a robust OLEMP that is carried out for a suitable period of time.

8.48. Nine receptors are identified in the LVIA as likely to experience Significant residual visual effects. This is a concern and indicates that the scale and extent of Development makes impossible to mitigate all potential visual effects, and there is a potential that all Significant effects have not been fully identified due to the assessment being focussed on



static viewpoints rather than visual receptors, which could experience views of the Development along a linear route. We also have concerns that the mitigation planting itself has the potential to cause adverse visual effects through blocking or foreshortening currently open views, appearing out of character, or creating a perception of enclosure in an open landscape. Further detail is provided in the mitigation section below, but the mitigation planting must be well considered at any detail design stage, and not simply put in place to screen views of development.

- 8.49. Access, and the wider highways elements of the scheme, do not appear to be fully considered in the LVIA beyond increased traffic during construction and decommissioning phases. This is despite the potential for adverse effects on the views of the rural landscape including potential vegetation loss, urbanisation, and reduction of visual amenity. Consequently, the visual effects during construction may be underestimated within the LVIA due to the impact of loss of vegetation in the wider landscape. We recommend limiting vegetation loss along site boundaries, for access or for sight lines, or along construction access routes, as this has the potential to change the character of the local landscape beyond the limits of the Development. Clarification on this matter by the applicant should be provided.

#### Cumulative Landscape and Visual Effects

- 8.50. Cumulative landscape and visual effects are those that: “result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other developments.”
- 8.51. Table 18.3 Inter-Project Cumulative Effects Assessment identifies the schemes that have been considered in the cumulative assessment, and of those only two have been identified as having Significant Landscape and Visual cumulative effects:
- **21/01577/FULM:** Installation of a solar farm and battery storage facility with associated infrastructure: A **moderate to major adverse** cumulative effect interaction (Significant) would arise for construction and operation respectively to the landscape character of MNF PZ 12.
  - **EN020034:** North Humber to High Marnham: A **moderate to major adverse** cumulative effect interaction (Significant) would arise for construction and operation respectively to the visual amenity of users of PRoW to the south of East Drayton.
- 8.52. Significant cumulative effects are identified through extending the overall area of development, increasing the land use area changed from agricultural to energy infrastructure, and also visually through increasing the extent the schemes may likely be visible by receptors.

- 8.53. We also have concerns regarding cumulative effects on the national, county, and regional landscape character areas from multiple solar projects both approved and also in the system, having the potential to be constructed across the Nottinghamshire and Lincolnshire regions. While this has been identified in the baseline review, it is important to re-iterate this point.
- 8.54. The mass and scale of several NSIP scale energy projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. However repeated views and presence of large scale solar would undoubtedly increase the susceptibility of receptors to changes in view.

#### Residential Visual Amenity and Settlements

- 8.55. Residential Visual Amenity has been considered as part of the LVIA, which is detailed in para. 11.3.13, clarifying that 20 properties were visited to review residents' views. The Siting and Design section of the LVIA (para. 11.5.8 onwards) also goes on to explain how the site layout and mitigation has responded to properties, with a section dedicated to the Design response to dwellings at para. 11.5.14 along with detail provided within Table 11.10 Residential mitigation. This goes some way to demonstrate an iterative design approach and reaction to the findings of the initial assessments carried out, however does not provide information at a level to clearly identify the potential effects on residential visual amenity.
- 8.56. Residential Visual Amenity Assessment (**RVAA**) is a stage beyond Landscape and Visual Impact Assessment and focuses exclusively on private views and private visual amenity, whereas the LVIA process is typically associated with public views from public areas. The Landscape Institute's Technical Guidance Note 2/19: 'Residential Visual Amenity Assessment' provides further detail and that the Residential Visual Amenity Threshold (**RVAT**) is reached when the change to visual amenity of residents in individual properties identified as "having the greatest magnitude of change". On this scheme, due to the scale and extents, as well as height of some elements (e.g. Sub stations being up to 13.5m high) we would anticipate that some residents may experience Significant adverse visual effects from several properties, and while it is generally unlikely that properties will reach the RVAT through the Development of a solar farm, it is not possible to understand this process or any findings as they have not been presented. It would be beneficial for the applicant to clarify their position in regard to RVAA and why the initial residential visual amenity surveys have not been presented to aid transparency.

- 8.57. We acknowledge that the LVIA does consider settlements and views from residents within these, but a robust methodology as to how individual properties have been identified (study area) and how their visual amenity would be affected has not been provided.

#### Mitigation Measures

- 8.58. We accept that planting can be an effective way to screen development proposals and add valuable landscape and ecological elements into the landscape, however this needs to be carried out in a way that is sensitive to the existing landscape character or meet any aims of a published character assessment to improve or introduce new planting to an area. While residual visual effects have been assessed as reducing at 15 years through mitigation planting, this is completely dependent upon the successful establishment of the planting and it growing in a manner that is anticipated within the LVIA and illustrated on the accompanying visualisations. This is always going to be a risk, and if the planting does not establish as anticipated, the residual effects will likely be higher than judged.

#### Summary and Conclusions on the LVIA

- 8.59. By reason of its mass and scale, the Development would lead to Significant adverse effects on landscape character and visual amenity at all main phases of the scheme (construction, operation year 1, operation year 15). The Development has the potential to transform the local landscape by altering its character on a large scale across an extensive area. This landscape change also has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. We also judge that this would likely be classed as a permanent project in regard to landscape and visual matters, spanning several generations. As such, the likely effects may be understated as the author has deemed residual effects would be partly reversible.
- 8.60. The scale and extent of development would also lead to Significant adverse effects on views from receptors, by altering from views within an agricultural or rural landscape to that of a landscape with large scale solar development. We have highlighted some issues with the visual assessment within the LVIA and compliance with the recent Landscape Institute Technical Guidance Note LITGN-2024-01; The assessment is structured around static views rather than the experience of the visual receptor which should include for sequential and varying views. This should be reviewed further as part of the DCO examination, as the extent of visual effects do not appear to have been fully considered.
- 8.61. The cumulative landscape and visual effects of the Development have the potential to bring about Significant landscape and visual effects, however adjacent schemes identified within the ES are relatively small in comparison with the wider One Earth order limits schemes. We have concerns regarding effects on the national, county, and regional landscape character areas from the extent of renewable and energy infrastructure

proposed across the county. The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. This is a clear and marked change to landscape character.

### **Local Policy**

- 8.62. Core Policy 13 (Landscape Character) Amended Core Strategy Development Plan Document 2019:

*‘New development which positively addresses the implications of relevant landscape Policy Zone(s) that is consistent with the landscape conservation and enhancement aims for the area(s) ensuring that landscapes, including valued landscapes, have been protected and enhanced.’*

- 8.63. Policy DM5 (Design) Allocations and Development Management Development Plan Document 2013:

*‘Supporting text states - The diversity of landscape and built form within the District displays much local distinctiveness which the Council is keen to see reflected in new development. Development proposals should take reference from the Landscape Character Assessment SPD, locally distinctive layouts, design, detailing and methods of construction as a means of integrating itself into the surrounding area.’*

- 8.64. Policy DM5(b) Design Amended Allocations and Development Management Development Plan Document (for examination in November 2024).

- 8.65. Landscape Character Assessment Supplementary Planning Document 2013.<sup>13</sup>

- 8.66. As indicated above, the NSDC strategic level policies as contained within the Amended Core Strategy seeks to integrate new development into landscape character areas. Given the scale and extent of the proposed development, the proposed development fails to meet with this objective, given the significant change in the landscape character that will result.

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<sup>13</sup> [Landscape Character Assessment SPD | Newark & Sherwood District Council \(newark-sherwooddc.gov.uk\)](https://newark-sherwooddc.gov.uk/landscap-character-assessment-spd/)  
last accessed 30/06/25

- 8.67. Core Policy 13 and policy DM5 are supplemented by Policy DM4 of the ADMDPD which identifies that proposals will be supported, where its benefits are not outweighed by detrimental impacts from the construction, operation, and maintenance of the development, with impacts on landscape character (both individually and cumulatively) being a key criteria.
- 8.68. As referred to above, the ES LVIA Chapter reports a number of significant adverse effects, during operation and given that NSDC is not the determining authority in this case, any weighing up of benefits is a matter for the ExA. Accordingly, the proposed development is judged to be in direct conflict with Policy DM4 of the ADMDPD in respect of landscape character and associated visual impacts.

## **9. Biodiversity – Neutral/ Biodiversity Net Gain – Positive**

### Local Nature Recovery Strategy

- 9.1. Local Nature Recovery Strategies are a new statutory commitment from the Environment Act, 2021. These will be key in helping to build a Nature Recovery Network. Nottingham County Council is the responsible authority for the Nottinghamshire and Nottingham LNRS. The strategy is emerging at present but once complete, will become a spatial strategy for nature to guide funding decisions and enable the delivery of multi-functional benefits in priority areas. A statement of biodiversity priorities has been published and although it appears that LNRS will not be focused on BOMS, within Newark and Sherwood we would be keen for habitat creation and ecological enhancements/offsetting to take place within emerging LNRS measures. Currently there are substantial woodland mapped measures that fall within the eastern Order Limit (OL).

### Baseline Conditions

- 9.2. The existing ecological features identified during the desk study, consultations and field surveys are summarised with full details including survey methods and field survey results being provided in appendices (with the Badger elements within Appendix 6.7 as confidential). Following DCO submission further surveys for fish, great crested newts, winter, and breeding birds were undertaken and we will welcome the opportunity to review the results when available.

### Construction Phase Impacts

- 9.3. The main impacts in relation to biodiversity would stem from the construction phase of the development.
- 9.4. Apart from air quality, off-site impacts and in-combination effects have not been fully addressed, in some cases not all. The Scheme will be a significant feature in the landscape impacting ecological features such as habitat connectivity and it is not considered to comply with local policy.

### Positive

- 9.5. NSDC have identified no positive impacts during this phase.

### Neutral

- 9.6. The Fledborough to Harby Dismantled Railway Local Wildlife Site (LWS) falls within the OL and mitigation will be secured through Requirements 13 (CEMP) and 8 (LEMP) and is detailed within the outline documents provided. This is to include protective fencing, 5m buffer and potential new habitat creation complimentary to the existing habitats. As a result, NSDC are generally satisfied that sufficient information has been provided to conclude that there would be no potential for significant effects this designation as a result of the Scheme.
- 9.7. The section of the River Trent that runs through the Scheme does not qualify as a LWS but does comprise Priority Habitat. Likewise, mitigation will be secured through Requirements 13 (CEMP) and 8 (LEMP) and is detailed within the outline documents provided, though clarification is required regarding the size of the buffer zone.
- 9.8. Priority Habitat within the OL include an area of coastal and floodplain grazing marsh (CFGM) on the banks of the River Trent. Whilst there would be no negative impact upon this habitat, with the proposal to enhance and create new areas, NDSC have raised queries regarding assessment process to determine ecological importance. In particular whether this habitat, and others such as those within the Fledborough to Harby Dismantled Railway LWS, should have been assessed against Local Wildlife Site selection criteria as set out within the Nottinghamshire LWS Handbook<sup>14</sup>.
- 9.9. In respect of the level of survey effort for foraging and commuting bats there has been some debate between NSDC and the Applicant. However, following additional survey effort, the level is acceptable and there is commitment to further monitoring surveys over the operational period.

### Negative

- 9.10. Whilst the majority of existing baseline habitat are of relatively low biodiversity value, and therefore the development is capable of delivering enhancements to local biodiversity, NSDC have raised concerns with the methodology used to quantify the existing baseline habitat value as detailed within the Relevant Representations. Habitats may have been undervalued in the context of the BNG assessment and there has been no consideration for whether any of the arable margins qualify as Priority Habitats, given the presence of rare and scale arable plants identified through the desk study. As demonstrated through the BNG assessment, field margins are due to be lost to some, potentially significant, degree during the clearance of the Sites and construction of the arrays. Arable field margins, along with the hedgerow and ditch network, constitute the majority of the wildlife value within the Scheme so their loss would be significant.

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<sup>14</sup> Crouch, N. C. (2018). Nottinghamshire LWS Handbook – Guidelines for the selection of Local Wildlife Sites in Nottinghamshire. Nottinghamshire Biological and Geological Records Centre, Nottingham.

- 9.11. The value of watercourses within the OL may also have been underestimated within the context of the BNG assessment. The Sewer Dyke is hydraulically connected to the River Trent and had not been subject to in-depth assessment. Once fully assessed it is considered that it will be difficult to meet a 10% uplift in watercourse units on-site.
- 9.12. NSDC have also raised concerns regarding the proposed buffer distances to watercourses and lack of assessment of encroachment within the riparian zone associated with proposed infrastructure which includes clear span bridges and/or culverts. Without the implementation of sufficient protective buffer zones, there is a risk that the existing habitat may be damaged or degraded through direct construction damage or indirect impacts such as the release of sediments or dust which could flow into connected watercourses downstream of the OL.
- 9.13. The Council's Relevant Representation's also raised concerns regarding veteran trees. Chapter six states that no veteran trees were identified within the OL during the desk study, while Appendix 11.6 (Arboricultural Report) states under section 3.2 (General Observations) that 15 trees were classified as veteran features which are listed in Table 2. Confirmation has been requested as to whether any mature trees are considered to be veteran under the UKHabitat classification system and address these specific receptors. Currently insufficient information has been provided to demonstrate that all Veteran trees would be protected through the lifetime of the development or whether development would accord with local planning policy requirements in this regard.
- 9.14. Although higher quality bat commuting and foraging habitat are acknowledged within TA 6.4, NSDC consider that the hedgerow network has been undervalued, despite the majority of its retention. Accidental damage or pollution events during construction could degrade the hedgerow and watercourse network leading to localised, temporary adverse reductions in habitat quality for foraging bats.
- 9.15. Fifty-one trees within the OL were identified to support features potentially suitable for roosting bats. There are inconsistencies across their valuation via the use of two versions of the Bat Conservation Trust survey guidelines. No further surveys have been undertaken and impacts are currently unknown. Pre-construction surveys to evaluate trees for potential bat roosts, indicating these measures will be secured through the CEMP and specific details are lacking within the oCEMP.
- 9.16. Whilst Chapter 6 and the oCEMP and ooCEMP do have regard to lighting impacts in relation to bats and other nocturnal fauna, this has not been addressed sufficiently in relation to light sensitive species, in particular barbastelle. This species is particularly important within the Newark and Sherwood District being at the northern extent of its known range in Nottinghamshire and is vulnerable to large scale infrastructure schemes.
- 9.17. Small populations of grass snake and common lizard were recorded within the OL. Survey methodology did not follow the guidance referenced within Chapter 6 and the

justification for doing so is insufficient. It is likely that population size has been underestimated and given the low population thresholds stated within Part 2A of the Nottinghamshire LWS Handbook<sup>15</sup> there is potential for parts of the OL to meet the Criteria 3 for a 'key reptile site'.

- 9.18. NSDC have raised concerns with the methodology used to quantify the existing baseline value of the breeding bird population as detailed within the Relevant Representations. There is no consideration within Chapter 6 to LWS selection criteria and the non-standardised sampling approach has not considered large parts of the OL. This has potential to underestimate the number of territories for species such as skylark and other rare/scarce farmland bird species that have not been recorded to date such as corn bunting.
- 9.19. The introduction of tall structures and associated equipment into arable fields is expected to significantly, if not entirely, displace nesting birds. Some species, such as yellow wagtails, may be less affected due to their ability to nest in taller vegetation and tolerate limited visibility. This displacement is likely to persist throughout the duration of the project, potentially causing fragmentation of local bird populations and increasing competition within nearby arable and grassland habitats, which may already be nearing their ecological limits. Population dynamics of species such as skylark, yellow wagtail, and turtle dove at a Local, and potentially District, level can be expected to be moderately adversely affected (but not likely affected at a County level), in the absence of mitigation. Mitigation is to be secured as part of embedded mitigation, but it is unclear about how elements such as skylark plots will be secured and if features such as beetle banks will remain after decommissioning.
- 9.20. Aquatic invertebrates associated with the River Trent may be impacted through sediment mobilisation during horizontal directional drilling activities.
- 9.21. The impacts of major solar farm developments should not be assessed in isolation. Proposals must be considered in the context of other similar schemes—whether consented, under construction, or operational—both within the District and in adjacent areas, to fully understand their cumulative effects. Cumulative impacts are assessed within Chapter 18: Cumulative Effects. All environmental aspects have been considered, though it is light in detail of both off-site and in-combination effects with regards to biodiversity. The Scheme will be a significant feature in the landscape with extensive landscape scale conversion of arable farmland to grassland and other habitats and this cumulative habitat loss should be further examined in terms of its specific biodiversity features of interest.

### Operational Phase Impacts

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<sup>15</sup> Crouch, N. C. (2014). *Nottinghamshire LWS Handbook – Guidelines for the selection of Local Wildlife Sites in Nottinghamshire. Part 2A – Local Wildlife Sites selection criteria: species*. Nottinghamshire Biological and Geological Records Centre, Nottingham.



### Positive

- 9.22. Water quality in ditches within the OL is expected to improve after development. This is due to the planned conversion of the area beneath the solar PVs to permanent grassland, which will reduce sediment runoff, and the discontinuation of fertiliser and pesticide use. Similarly, the halt in agricultural activities is also likely to enhance water quality in existing ponds within the OL.
- 9.23. Chapter 8: Biodiversity includes a comprehensive review of the legislation and policies pertinent to the Scheme.
- 9.24. The cessation of intensive arable farming practices—particularly the use of insecticides—and the reversion of land to permanent grassland for the duration of the solar array's operation are expected to enhance invertebrate diversity and abundance across the site.
- 9.25. Additional positive impacts are expected from the enhanced ability of the newly established and managed grasslands, along with other forb-rich habitats, to support a larger abundance invertebrates compared to arable land. These habitats will cover most of the OL, including areas beneath the solar PVs and within buffer zones and easements. This is likely to boost the availability, variety, and productivity of foraging resources.

### BNG

- 9.26. Whilst the delivery of a 10% uplift in Biodiversity Net Gain is not currently mandatory for NSIPs, a Statutory Biodiversity Metric (SBM) was used to calculate the net gains for the Scheme and is detailed within Appendix 6.10. The BNG mitigation hierarchy has been followed with the avoidance of high and medium distinctiveness habitat types as far as possible and a precautionary approach is proposed.
- 9.27. The level of detail is sufficient to understand what is being offered in broad terms, but it does not represent a full specification suitable to set terms of reference for agreement of the detailed plan later as a Requirement. Whilst following amendments the quantum of BNG to be achieved is likely to over 10%, it cannot be agreed until sufficient information has been provided to verify the applicant's BNG calculations. Amongst other things, the condition scores for the baseline and proposed habitats require further justification; including the 'Strategic Significance' weighting which is not in line with NSDC adopted document<sup>16</sup>. The assessment against the emerging draft Nottinghamshire Local Nature Recovery Strategy (LNRS) is also incorrect. However, only if the scheme is approved after the LNRS is published, would the BNG calculations need to be amended to apply the relevant strategic significance multipliers based on the LNRS. It is anticipated that any potential changes would have a positive effect on the assessment.

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<sup>16</sup> Newark and Sherwood District Council. (2024). Mandatory Biodiversity Net Gain Strategic Significance – February 2024. <https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/yourcouncil/planning-policy/other-planning-policy-information/biodiversity-and-landscape/MandatoryBiodiversity-Net-Gain---Strategic-Significance-Policy.pdf>

- 9.28. NSDC have raised concerns regarding how habitat below the solar panels is recorded, as set out in the Council's Relevant Representation. However, the Council accepts that there will be a significant gain in the conversion of cropland to grassland regardless of how this is calculated. Areas of concern included a lack of supporting soil testing to confirm viable nutrient indexes to support species-rich grassland establishment and limited details of long-term management.
- 9.29. We would also welcome further discussion and consultation on the Scheme delivering more green corridors and connectivity to off-site Priority Habitat. However, despite this the Scheme would still bring positives and overall accord with national and local policy.

Neutral

- 9.30. Operational impacts are expected to be minimal, as vehicle access will be infrequent and restricted, with no anticipated need to enter watercourses or ditches during the operation of the array. This will greatly reduce the potential for disturbance, pollution, or physical damage.

Negative

- 9.31. While individual foraging woodcock were recorded on occasion, no breeding could be confirmed or was considered likely. In the event that a territory is present within the OL, it would likely be displaced.
- 9.32. It is accepted that it is too early to fully predict long-term effects on bat populations from solar farms, as large-scale solar farms have not been routinely monitored to predict long-term effects on bat populations. Whilst NSDC support the proposal to include monitoring surveys to improve the confidence of the assessment of residual adverse or beneficial effects, which would provide a greater dataset to inform future large scale solar schemes, there is uncertainty around the impacts resulting from the proposed Scheme given there are woodlands that border the edge of the Scheme. The Scheme's generally low suitability to bats and low habitat diversity is borne out by the dominance of common and widespread species within the survey and desk study data which include common and soprano pipistrelle. The rarer species of barbastelle bat and Nathusius' pipistrelle appear within the data at extremely low rates (~1% and 0.1% of calls respectively). Whilst this may reflect the wide-ranging, migratory behaviour of these species, it also likely reflects the low survey effort (15 recording nights at 6 deployment locations in 2023, though increased to 35 recording nights at 12 locations in 2024) which decreases detection probability for a given species. This is also evident from the heat map which clearly shows a low transect survey effort which is not consistent with current guidelines (Collins, 2023).
- 9.33. Given the large scale of the project there are opportunities for innovative biodiversity enhancements that go beyond maximising the percentage biodiversity net gain. While the proposals demonstrate an intention to restore and create areas of Priority CGFM Habitat, achieving a proposed 113.17% gain in habitat units, there is scope for further alignment with local nature conservation priorities, with missed opportunities for connecting

existing woodland blocks within the OL to adjacent woodlands along the eastern boundary.

#### Decommissioning Impacts

- 9.34. Activities relating to the removal of solar panel frames, underground cabling, substations and concrete footings, access and energy storage would be expected to have similar (or no worse) direct effects as those described in the construction phase impacts for each receptor. Comparable levels of disturbance from movement of vehicles and personnel would be expected.

#### Positive

- 9.35. Returning the land to open arable use could benefit certain farmland bird species that rely on clear sightlines, as well as plant species typically found along arable field margins. However, this potential benefit is uncertain at this stage and would depend on the implementation of a well-defined decommissioning plan, of which have not yet been established.

#### Neutral

- 9.36. Depending on the ecological value of the habitats that develop over the lifespan of the scheme, it is realistic that certain areas of the site may be retained due to their value for wildlife on decommissioning. Further surveys to identify the use of the newly created habitats by these receptors would therefore also be expected as a minimum.

#### Negative

- 9.37. Habitats created on arable land are likely to be returned to their former land use, which would constitute a permanent habitat loss. Depending on the biodiversity value of the new habitats this might not represent a significant negative impact given that the requirements of the BNG assessment will be met in advance of decommissioning. In order to return to arable food production an increase in the use of pesticides and herbicides would be expected which are associated with a reduction of biodiversity and there is no indication to undertake a new BNG assessment prior to decommissioning to quantify and mitigation for any losses.
- 9.38. Based upon the baseline data, protected species which could be directly impacted by decommissioning activities could include badgers, water vole, otter, reptiles (grass snake) and breeding birds.

#### Required Mitigation

- 9.39. The mitigation hierarchy, as dealt with in the EN-1, includes avoidance as part of the Design stage. This is evidenced separately within Chapter 4, where the scheme design was revised in response to ecological assessments to avoid Priority Habitats and minimize areas of potentially significant impact and in this respect complies with local policy.
- 9.40. Mitigation and compensation have been considered and are dealt with in varying levels of detail. Table 6.6 in Chapter 6: Biodiversity provides a valuable summary although there

are some inconsistencies with what is then detailed within the outline securing mechanisms which include the oCEMP, ooCEMP, oDMP, oLEMP and BNG strategy reports.

- 9.41. The outline Landscape and Ecology Management Plan (oLEMP) outlines some initial planting guidelines; however, due to the evolving nature of the design proposals, it provides only limited detail regarding the long-term management of vegetation. The guidance needs to be firmed up within the official LEMP in order to be assured of the enhancements proposed and to create the screening required to lower the visual impact to surrounding sensitive landscape from the proposed Solar Farm and to ensure mitigation for farmland birds and BNG is delivered. There are also inconsistencies with reference to the proposed length of habitat management and monitoring and should be over the lifetime of the development which would be 60 years.
- 9.42. An outline Construction Environmental Management Plan (oCEMP) and outline Operational environmental Management Plan (ooCEMP) have been produced to detail construction and operational mitigation measures. An outline Decommission Management Plan also details mitigation measures for this later stage of the Scheme. The outlined plans are considered applicable and proportionate to the Scheme, though detailed feedback to address inconsistencies has been provided to the Applicant to incorporate into the final versions.

#### **Local Policy**

- 9.43. Newark and Sherwood's Vision as noted within the Council's Amended Core Strategy DPD 2019, states as follows.

*'By 2033, Newark and Sherwood will...maximise **opportunities for appropriate renewable energy...while safeguarding and enhancing the natural environment**, strengthening green infrastructure, new green and woodland spaces will increase ecology, biodiversity and nature conservation, providing a resource for local people and encouraging personal well-being and health.'*

- 9.44. Nottinghamshire is losing its wild species and habitats at an alarming rate (Nottinghamshire Local Biodiversity Action Plan). Nature is being increasingly confined to small, fragmented areas with little or no connectivity.
- 9.45. Information exists on the biodiversity improvement priorities within the county. The most important areas for wildlife conservation remaining in Newark and Sherwood have been identified through the Nottinghamshire Biodiversity Map (BOM) Reports. BOMs are recognised as those areas where targeted maintenance, restoration and creation of priority habitats will have the greatest impact in improving connectivity and reducing habitat fragmentation. The Newark and Sherwood BOM was published in 2016, and which was used to inform the Focal Areas identified in Newark and Sherwood District Council's adopted document outlining Mandatory Biodiversity Net Gain Strategic Significance which was adopted by Cabinet on 23 January 2024.

- 9.46. Newark and Sherwood District Council produced a Green Infrastructure Strategy 2010, responding to the need to plan for predicted growth, enhance quality of life and ensure environmental sustainability in the District for generations to come.

NSDC Amended Core Strategy (AMC) Policy 12 Biodiversity and Green Infrastructure

- 9.47. Core Policy 12 (Biodiversity and Green Infrastructure) Amended Core Strategy Development Plan in 2019 sets out how developments should protect and enhance biodiversity, including the provision of new or improved green infrastructure. Supporting text states:

‘Seek to secure development that maximises the opportunities to conserve, enhance and restore biodiversity and geological diversity and to increase provision of, and access to, green infrastructure within the District.’

Allocations and Development Management Development Plan Document (ADMDPD)  
Policy DM5 Design

- 9.48. Policy DM5(b) (Design) Allocations and Development Management DPD 2023 (Amended plan currently under examination) states that:

“...in accordance with the requirements of Core Policy 9, all proposals for new development shall be assessed against the following criteria: ...

...5. Trees, Woodlands, Biodiversity & Green Infrastructure

In accordance with Core Policy 12, natural features of importance within or adjacent to development sites should not be unnecessarily adversely impacted and development should first seek to respect existing features before the Council will consider removal of such features. The starting point should be through integration and connectivity of the Green Infrastructure to deliver multi-functional benefits.

7. Ecology

Where it is apparent that a site may provide a habitat for protected species, development proposals should be supported by an up-to date ecological assessment, including a Habitat survey and a survey for species listed in the Nottinghamshire Biodiversity Action Plan. Significantly harmful ecological impacts should be avoided through the design, layout and detailing of the development, with mitigation, and as a last resort, compensation (including off-site measures), provided where significant impacts cannot be avoided.”

ADMDPD Policy DM7 Biodiversity and Green Infrastructure

- 9.49. Policy DM7 (Biodiversity and Green Infrastructure) Allocations and Development Management DPD 2023 (Amended plan currently under examination) states that:

‘Development proposals in all areas of the District should seek to enhance biodiversity. Proposals should take into account the latest information on biodiversity including Nottinghamshire Biodiversity Opportunity Mapping, and the forthcoming Local Nature

Recovery Strategy. Except for exempt development proposals, the enhancement should be a net gain of at least 10% (or if different, the relevant percentage set out in the Environment Act) as measured by the applicable DEFRA metric or any successor document. These gains must be guaranteed for a period of at least 30 years....

New development should protect, promote, and enhance green infrastructure to deliver multi-functional benefits and contribute to the ecological network both as part of on-site development proposals and through off-site provision.'

- 9.50. The collective policies as reviewed above seek to protect biodiversity assets within the district, alongside promoting biodiversity enhancement. Whilst the latter is likely, given the proposals for Biodiversity Net Gain associated with the proposed development, in respect of impacts upon existing biodiversity, there is still further survey work to be undertaken, but it is considered that through an appropriate level of mitigation to be agreed with NSDC, impacts are anticipated as being neutral.

## **Arboriculture – Neutral/Negative**

### Baseline Conditions

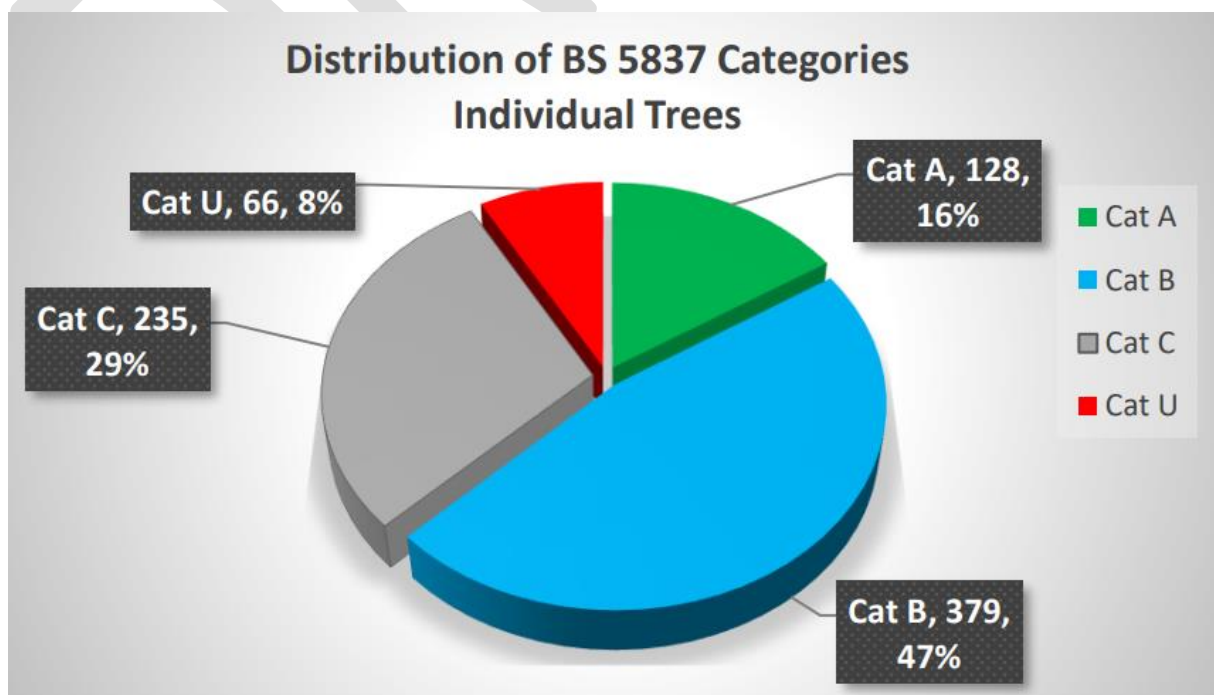
- 9.51. The presence of trees is considered within the Appendix 11.6 – Arboricultural Report of the ES. The report is noted as being a 'Stage 1 Preliminary Arboricultural Report.; The purpose of the report is noted as being three fold to:

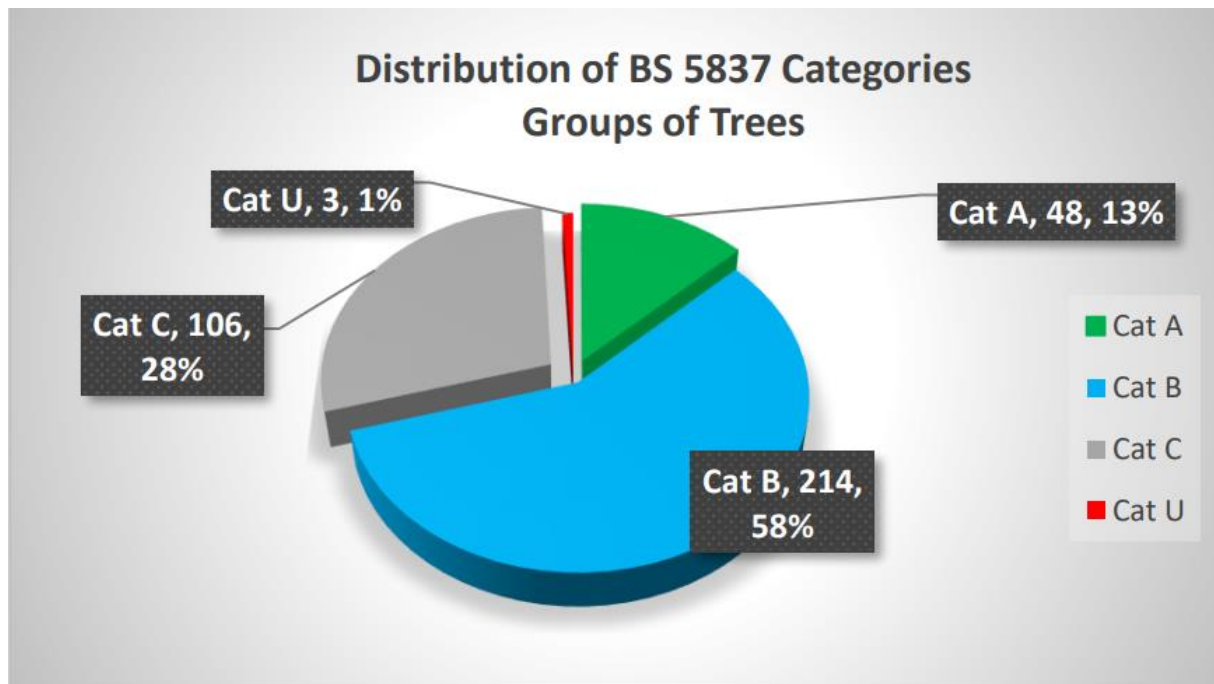
- Identify the Quality and the value of the trees.
- Categorise them in respect of their suitability for retention; and
- Provide initial feedback on the survey.

- 9.52. The survey work was undertaken between February and June 2024 and therefore the data that informs the report is now over a year old. The trees are categorised within Table 1 in the report as follows:

BS5837:2012 Categories	Definitions	Retention implications to a site
Category A (marked light green on the TCP)	Trees of high quality and value able to make a substantial contribution to the site.	Every effort should be made to retain trees and amendments to a proposed scheme should be identified in preference to tree removal.
Category B (marked mid-blue on the TCP)	Trees of moderate quality and value able to make a significant contribution to the site.	Where possible amendments to a proposed scheme should be considered in preference to tree removal.
Category C (marked in grey on the TCP)	Trees of low quality and value in an adequate condition until new planting can be established, trees with impairments downgrading them from A or B category OR young trees with a stem diameter of less than 150 mm.	The retention of trees may be advantageous in the short term, but they should not be seen as a constraint to development.
Category U (marked in dark red on the TCP)	Trees that have limited condition that will fail or die within 10 years and/or should be removed for reasons of arboricultural best practice	Not a material consideration in the planning process but may have other benefits.

9.53. The report confirms that as part of the survey, a total of 808 individual trees, 371 groups of trees and 435 hedgerows were recorded, with the basic breakdown of categorisation within the report of individual and group trees, presented within Chart 1 and Chart 2 within the report and reproduced below.





9.54. The general observations of the report, as noted at paragraph 3.2 notes that:

*Overall, the trees contribute very well to the surroundings and are typical of the wider rural landscape. Whilst there are numerous trees that have suffered from damage from storms and agricultural operations, this is not necessarily reduced their visual amenity, and in some instances has increased their habitat benefit.*

9.55. Finally, the report also notes that there are numerous trees of historical and cultural value, due to their age, condition, and size and 15 trees have been classed as veteran trees which are considered (according to the report) '*irreplaceable in the landscape.*' The Veteran Trees are recorded within Table of the report, which is presented below.



Veteran Trees Recorded	
T82	Crack willow
T84	Crack willow
T107	English oak
T108	English oak
T136	Crack willow
T138	Common Ash
T246	English oak
T267	English oak
T320	English oak
T370	English oak
T426	English oak
T501	Common Ash
T699	English oak
T711	English oak
T754	English oak

#### Impacts

- 9.56. The report as prepared is acknowledged as being a preliminary stage one report and in the conclusions of the report at paragraph 4.21 (Arboricultural Impact Assessment) it includes the following recommendation.

*‘Early arboricultural advice should be sought so that design layout can successfully integrate the more prominent trees and trees with greater long-term potential. The details of the tree constraints plan and this report should therefore be made available to all disciplines involved in the site layout, particularly landscape architects and drainage engineers.’*

- 9.57. In relation to the above, it is clear from the Initial Hearings that took place marking the commencement of the examination of the project during the week commencing the 7<sup>th</sup> July 2025 that no stage 2 work has been undertaken and/or made available to the examination. It is also noted that the order limits area has been altered (albeit this was a decrease in size) since the original arboricultural survey work was undertaken. As such, there is currently no clear understanding of the impact of the proposed development upon trees.

#### **Local Policy**

Allocations and Development Management DPD 2013

9.58. Policy DM5 (Design) states as follows.

Trees, Woodlands, Biodiversity & Green Infrastructure - In accordance with Core Policy 12, natural features of importance within or adjacent to development sites should, wherever possible, be protected and enhanced. Wherever possible, this should be through integration and connectivity of the Green Infrastructure to deliver multi-functional benefits.

Supporting text states:

*Features of natural importance such as trees and hedges significantly contribute to the landscape character of the District and can also be used to help integrate new development into it. Where a site contains or is adjacent to such features, proposals should take account of their presence and wherever possible incorporate or enhance them as part of the scheme of development in order to improve the connectivity of the Green Infrastructure. Where it is proposed to remove features, justification will be required, and re-planting should form part of development proposals.*

9.59. Until such time that the impacts upon trees have been properly considered within the DCO application and a Arboricultural Impact Assessment is prepared, NSDC are unable to comment upon the impacts upon trees within its administrative area and this is a matter of concern to our members. Following a precautionary approach, until proven otherwise, we have assumed a precautionary approach of assuming neutral/negative impacts and conflict with local plan policy as considered above, unless proven otherwise.

## **10. Noise and Vibration – Neutral**

### Baseline

10.1. Baseline noise conditions have been determined through a baseline noise measurement survey which was carried out from Thursday 15th to Thursday 22nd February 2024. The survey was designed to capture noise levels across the Order Limits during the daytime (0700 hrs to 2300 hrs), evening (1900 hrs to 2300 hrs) and night time (2300 hrs to 0700 hrs) periods using monitoring locations which are representative of the assessed receptors.

10.2. The existing noise environment was found to be affected by traffic noise on the A57, A1 and A113.

### Assessment

10.3. A study area has been defined for each phase of the development, with receptors within this area considered for assessment. Outside of this study area, noise from the development is not considered to be significant.

- 10.4. Noise impact has been assessed in line with Planning Practice Guidance for Noise (PPG(N)) and The Noise Policy Statement for England (NPSE). Construct Traffic was assessed based upon Design Manual for Roads and Bridges LA 111 'Noise and Vibration' (DMRB LA 111) and the Institute of Environmental Management and Assessment (IEMA) Guidelines for Environmental Noise Impact Assessment (ENIA Guidelines), construction noise following BS 5228-1 (2014), and operational noise BS4142 (2019).
- 10.5. Assessment has been undertaken both without and taking account of mitigation. Mitigation measures identified include:
- Construction Environmental Management Plan (CEMP):** This plan includes measures to control noise and vibration during construction activities. It includes scheduling noisy activities during less sensitive times of the day, using quieter equipment and machinery, implementing noise barriers and enclosures around noisy equipment.
- Construction Traffic Management Plan (CTMP):** This plan aims to minimize noise from construction traffic by designating specific routes for construction vehicles, limiting the speed of vehicles, scheduling deliveries to avoid peak traffic times.
- 10.6. At present, only outline management plans have been produced, pending final development details.

#### Operational Phase

- 10.7. Mitigation has been identified for BESS and substations. These measures include installing plant at distance from receptors, installing noise barriers around the BESS and substations, using soundproofing materials and enclosures and regular maintenance to ensure equipment operates quietly. Final details of plant have not yet been confirmed. As such, a maximum noise levels have been specified for those items of plant nearest to receptors.

#### Local Policy

- 10.8. The NSDC Allocations and Development Management Development Plan Documents (ADMPD) as adopted in July 2013, includes Policy DM4 – Renewable and Low Carbon Energy Generation, seeks to ensure that benefits of such development are not outweighed by any detrimental impacts, upon various issues, but with point 4 of the policy referring to *Amenity, **including noise pollution**, shadow flicker and electro-magnetic interference*.
- 10.9. Taking account of the wording of policy DM4, as noted in the explanatory text of the policy, proposals should take account of impacts generated during the preparation and installation process and those arising thereafter. At this stage, it is noted that the output of the Environmental Assessment work indicates that construction noise and vibration is judged to be not significant and operational noise is assessed as being not significant, with the imposition of mitigation. As such, the impacts in respect of noise are expected to be

neutral, although this is an interim conclusion, based upon the available information and noting that the Draft DCO contains requirements 14, 15 and 16, which will provide further information and construction and operational noise impacts.

## **11. Air Quality – *Neutral***

### Baseline

- 11.1. The applicant defines the boundaries of the assessment area for construction dust using Institute of Air Quality Management (IAQM) guidance and for construction traffic using the Design Manual for Roads and Bridges (DMRB) guidance.
- 11.2. Baseline levels are determined using data from the annual Pollutant Release and Transfer Register (PRTR) return, Local Authority Annual Status Reports (ASR), Bassetlaw diffusion tube monitoring and DEFRA background modelled levels. Future levels are modelled using Atmospheric Dispersion Modelling System (ADMS) Roads model.
- 11.3. Annual NO<sub>2</sub> diffusion tube results at Dunham are the only monitored air quality within the study area. Levels dating back to 2018 are discussed and 2020 and 2021 are discounted based on being unrepresentative of 'typical' conditions due to COVID-19. 2022 results are used as the baseline for NO<sub>2</sub>. The level is 17.2 µg/m<sup>3</sup> which is below the national objective of 40 µg/m<sup>3</sup> and below 60 µg/m<sup>3</sup> which the report states indicates that exceedance of the 1 hour mean objective is unlikely.
- 11.4. The effect of vehicle emissions affecting ecological receptors has been screened out of the assessment. The effect of post construction site vehicle emissions has been screened out the assessment.
- 11.5. DEFRA background maps have been used to calculate the predicted levels of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> for the baseline year of 2022. The report states that levels are all below their objectives. The effect of vehicle emissions affecting ecological receptors has been screened out of the assessment.

### Assessment

- 11.6. Receptors have been identified based on worst case scenario. Levels of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> for the baseline year of 2022 have been modelled at these receptors. This has been extrapolated to predict levels of these pollutants for the year 2027 without and with the proposed development. The predicted impact at sensitive human health receptors is described as negligible at all receptors with a maximum percentage change of 2% with the development.

- 11.7. The potential for construction dust impact during earthworks and construction is considered to be large. The magnitude of impact for earthworks, construction and trackout is considered to be large. The surrounding area is deemed high sensitivity to dust soiling. There are no designated ecological sites within 50m of the order limit or roads where material may be tracked, consequently the sensitivity of ecological receptors is considered to be low. Human health sensitivity is considered to be low given existing background PM10 levels and properties nearest order limits are away from roads and potential trackout impact.
- 11.8. Without mitigation dust soiling impact from construction and earthworks is considered to be high risk. Dust soiling impact from trackout is considered to be medium risk. The impact from earthworks, construction and trackout on human health and ecological receptors is considered low.
- 11.9. The development supports national PM<sub>2.5</sub> reduction targets (AMCT and PERT) and complies with DEFRA's interim planning guidance.

#### Wider ES Review

- 11.10. An outline Construction Environmental Management Plan (oCEMP) has been submitted which lists generic air quality and dust mitigation measures. It is expected that this will be refined and shall include some site-specific measures for later iterations. It is noted that a Dust Management Plan (DMP) is proposed as part of the oCEMP. This is not yet available to view.

#### **Local Policy**

- 11.11. The ADMDPD, includes Policy DM10 – Pollution and Hazardous Materials, which seeks to manage proposals which have the potential for pollution and manage impacts on health, the natural environment and general amenity in respect of (amongst other things) Air Quality. Whilst there is further information that is expected to be made available in due course, impacts on Air Quality are expected to be neutral, with the appropriate best practice mitigation measures in place.

## **12. Land and Soils– *Negative***

#### Baseline – Contamination

- 12.1. In respect of Land and Soils, NSDC have reviewed the Preliminary Risk Assessment (PRA) report as contained in Appendix 8.2 of the ES. This includes an environmental screening report, an assessment of potential contaminant sources, a brief history of the site's previous and current uses and a description of the site walkover.

12.2. Due to the scale of the development, not all site areas have been visited as part of the site walkover and there are therefore some assumptions made regarding the risk at some unvisited locations. However, given the proposed use of the site is very low sensitivity in relation to human health risk, NSDC have no significant concerns with the findings of the report in respect of receptors within the Newark and Sherwood area. We would expect all site construction workers and future maintenance workers to adhere to Health and Safety legislation and to wear appropriate PPE in order to minimise the risk of exposure to any unexpected contamination. Finally, NSDC note that the report concludes with a recommendation for a scope of intrusive sampling and ground gas monitoring at the former High Marnham power station site. Whilst we would concur with this recommendation based on the PRA, this location is outside of the NSDC administrative area and as such, the authority holds no records in this regard. We would expect Bassetlaw District Council to therefore provide advice in this regard.

#### Agricultural Land Classification

12.3. Turning to the issue of Agricultural land classification, NSDC have received advice from its externally appointed advisors on the technical elements of the soil survey investigative work (in respect of the Best and Most Versatile Agricultural Land) and in this regard wish to make the following key observations.

- A detailed baseline Agricultural Land Classification Survey (ALC) has been undertaken (as presented within Appendix 8.3 of the ES), in conjunction with Natural England consultation, it covers the whole Order Limit area of 1400 hectares and in detail at a standard density of 1 auger bore per hectare.
- The ALC work has been undertaken by a specialist firm using conventional auger techniques.
- The ALC report has identified agricultural land of Grade 2, Subgrade 3a and Subgrade 3b quality. The findings confirm that 53.3% (660 Hectares) of the site is BMV quality, based on detailed surveys.
- An outline Soil Management Plan has also been prepared to include construction, management, and decommissioning stages of the proposal. The final version should be prepared in line with national guidance as set out in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Site (the Soil Code).
- With identified land drainage issues on site, the Soil Management Plan does address some of the concerns associated with land drainage. This will be particularly important along the cable routes.
- At the moment the cable routes have not been surveyed in detail, but once clearly identified this should be subject to further consideration.

- Although not mentioned specifically there may be justification for a soil health assessment and input to loss of land for food production and the impact on any agricultural holdings affected, particularly given the proposed development would have an operational lifespan of 60 years.

### **Local Policy**

- 12.4. Spatial Policy 3 of the Amended Core Strategy – Rural Areas, deals with agriculture, stressing the need to protect agriculture in developments within a rural setting.
- 12.5. As such, NSDC note that a total of 53% of BMV land will be impacted by the proposed development, of which 20% is classified as Grade 2 Land. Whilst the Applicant notes that this is for a temporary period (as also referred to below in respect of cumulative impacts) the proposed development has a longer than average operational lifespan of 60 years for a solar farm and NSDC are very concerned about the impacts on BMV land. NSDC particularly take the view that loss of Grade 2 (Very Good Agricultural Land) land should be avoided. As such, NSDC consider that only Grade 3a and Grade 3b (or lower grade quality) should be utilised, on the basis of the long-term loss of such valuable land for food production purposes.

## **13. Built Heritage – Neutral**

### **Assessment of significance**

- 13.1. There are twelve Heritage Assets that have been identified as significant and that will be impacted by the proposed One Earth solar farm within the NSDC area. The Nottinghamshire County Council Historic Environment Record (HER) and National Heritage List was used to cross reference the map provided to make this assessment. This is slightly more than the nine that have been identified on the map provided.
- 13.2. In general, the most numerous area with listed buildings is the South Clifton settlement. North Clifton and Thorney both have fewer heritage assets, but two assets have been noted as more significant with a listing status of Grade II\*.
- 13.3. Two grade II\* Churches have been identified as the most significant assets that lie adjacent to the proposed solar farm.
- 13.4. The number of non-designated heritage assets increase the level of significance accordingly following roughly the numbers of listed buildings. These comments will focus on listed assets with one monument as this is where the higher level of significance has been identified.

- 13.5. South Clifton is the only area with a Conservation Area and a large historic core compared to other settlements where heritage assets have been identified.

#### Impact

- 13.6. There are twelve assets that have been identified (as indicated below), these have been identified as being near the Order Limits boundary. Two of these assets are also a Grade II\* Churches, the other ten are all Grade II listed. The assets that have been identified as most impacted by the solar farm are listed below in order most impacted to least. One monument has also been identified.

1. **Church of St George (1046053) – Grade II\* (Near North Clifton)**
2. **Church of St Helen (1302452) – Grade II\* (Thorney) Note: This was not identified on map as Grade II\***
3. **Ruins of Old Church in Churchyard (1178446) – Grade II**
4. **Lychgate at Church of St George (1068081) – Grade II (Near North Clifton)**
5. **Fledborough Viaduct (Fledborough and North Clifton) Victorian to late 20th Century (Monument)**
6. **Firs Farmhouse (1302430) – Grade II**
7. **Hall Farmhouse (1302529) – Grade II (North Clifton)**
8. **Trent Lane Farmhouse (1369937) – Grade II (North Clifton)**
9. **The Old Manor House (1046018) – Grade II (Thorney)**
10. **Thorney War Memorial (Gates) (1462827) – Grade II (Thorney)**
11. **Cottage at Thorney Hall (1369961) – Grade II (Thorney)**
12. **House at Thorney Hall (1046017) – Grade II (Thorney)**

- 13.7. With close reference to section 212 of the National Planning Policy Framework (NPPF), considering potential impacts, it is noted that greater weight to the asset should be given the higher the listing status and its conservation irrespective of level of harm.

- 13.8. The phrasing which has been applied to all heritage assets within the district states:

‘Significance heavily linked and similarity of potential effects.’

#### Assessment of impact on each heritage asset identified and mitigation measures

1. **Church of St George (1046053) – Grade II\* (Near North Clifton)**

#### Impact of proposal

The Church has architectural and historical significance and dates to the 13th century. The topography of the area means the belfry is very exposed and visible from many vantage points. One vantage point that has not been identified within the assessment of significance is that of the viewpoint from the viaduct. This viaduct is higher than the surrounding ground level and is a cycle route. No photographs have been provided from the viaduct, with railings either side leaving an exposed and open view to the site with trees and shrubs scattered around the area.



### Recommended Mitigation

The wider site has been identified within the assessment provided as not having a relationship with the Church. This has no discernible bearing on the impact and level of harm that would be incurred from the proposal. Consideration should be afforded to how the proposed development impacts on the setting of this important heritage asset

**Church of St Helen (1302452) - Grade II\* (Thorney) Note: This was not identified on map as Grade II\***

### Impact of proposal

The Victorian church from 1850 has special architectural interest with its mixed of period styles. The proposal is far more distant from the site, with a road, hedging and a field between the eastern edge. This lessens the impact on the setting of the asset considerably compared to The Church of St George.

### Recommended Mitigation

Consider planting more trees and hedging to further screen views onto the site would further protect the setting of the heritage asset.

## **2. Ruins of Old Church in Churchyard (1178446) – Grade II**

### Impact of proposal

The ruins are unusual and distinct feature that further increase the significance of the setting near the Church of St. Helens. The impact would be limited due to their positioning as the Church of ST Helens shields any views.

### Recommended Mitigation

Increase hedging and tree coverage to further protect any views.

## **3. Lychgate at Church of St George (1068081)– Grade II (Near North Clifton**

### Impact of proposal

This listing would not be as impacted as the Church of St George due to its location, but it still forms part of the wider setting, and therefore further increases the significance of the site and subsequent impact that the proposal would have on the wider setting.

### Recommended Mitigation

None would be required for this heritage asset.

## **4. Fledborough Viaduct (Fledborough and North Clifton) Victorian to late 20th Century (Monument)**

### Impact of proposal

The monument is a significant Victorian architectural monument and is closely sited to the Grade II\* St George Church. The impact of solar panels either side would be detrimental to the wider setting of the viaduct.

Recommended Mitigation

The small parcel of land north should be removed with no panels near the viaduct to preserve the setting.

**5. Firs Farmhouse (1302430) – Grade II**

Impact of proposal

A small strip of the solar farm seems to encroach towards the heritage asset.

Recommended Mitigation

Unless an access road, it is recommended that this area is removed. If this the case, then no harm shall be incurred.

**6. Hall Farmhouse (1302529) – Grade II (North Clifton)**

Impact of proposal

There may be possible views from this heritage asset, no pictures present this within the report.

Recommended Mitigation

Increase hedging and planting to further reduce any views of the new site.

**7. Trent Lane Farmhouse (1369937) – Grade II (North Clifton)**

Impact of proposal

Limited, possible views from the site but is surrounded by other structures. There will be views in nearby field.

Recommended Mitigation

Suggest increased hedging to the south of the heritage asset.

**8. The Old Manor House (1046018) – Grade II (Thorney)**

Impact of proposal

Within a residential area, the property has a buffer zone formed by a street and another row of properties across it.

Recommended Mitigation

Suggest increased hedging to the south of the heritage asset.

**9. Thorney War Memorial (Gates) (1462827) – Grade II (Thorney)**

#### Impact of proposal

While slightly closer than the church, the gates are less significant. There is still ample space between this asset and the proposal, so impact would be limited.

#### Recommended Mitigation

Suggest increased hedging to the south of the heritage asset.

### **10. Cottage at Thorney Hall (1369961) – Grade II (Thorney)**

#### Impact of proposal

The asset is near the eastern site, but behind the Grade II\* St Helens Church meaning the impact is limited.

#### Recommended Mitigation

Suggest increased hedging to the south of the heritage asset.

### **11. House at Thorney Hall (10460170) – Grade II (Thorney)**

#### Impact of proposal

The asset is near the eastern site, but behind the Grade II\* St Helens Church meaning the impact is limited.

#### Recommended Mitigation

Suggest increased hedging to the south of the heritage asset.

#### Summary and Conclusions

The potentially most impacted heritage assets are the Grade II\* Church of St George and the viaduct (monument). Further information should be provided on the interaction between the proposed development and these assets. Whilst mitigation measures were noted, with paragraph 70 quoted within the report stating that trees and hedges would be utilised to reduce visual impact on heritage assets. Except for the Church of St George and the Viaduct, these measures would be appropriate for the other heritage assets that have been identified within these comments. They may also be appropriate for the Church of St George and the Viaduct once further information has been provided on the impacts upon these assets.

#### **Local Policy**

- 13.9. The key policies within the local plan, include Core Policy 14 – Historic Environment of the Amended Core Strategy which seeks to ensure the continued conservation of the district's heritage assets and historic environment in line with their identified significance and in accordance with national policy. Policy DM9 – Protecting and enhancing the Historic Environment notes that all development proposals affecting heritage assets should utilise appropriate siting, design, detailing and methods of construction. In this regard, at the present, NSDC do not anticipate any adverse impacts from the proposed development in

respect of heritage assets, but in order to minimise the level of harm, there are a number of mitigation recommendations, as outlined above.

## **14. Socio Economics – Positive**

14.1. In respect of Socio Economics, Chapter 17 of the ES sets out the potential for direct and indirect job creation during the construction, operation, and decommissioning phases. Whilst job creation is noted as a potential positive benefit, any permanent direct employment is limited to 7.25 jobs, as noted in table 17.18 of the chapter.

14.2. Although construction jobs are likely to be more significant (peaking at 750 over the course of the construction period) the limitations of the weight to be afforded to this number are acknowledged at paragraph 17.3.38 which states:

*‘These estimates are based on the best available information at the time of writing, but it should be noted that exact numbers of jobs during both construction and operation may differ.’*

14.3. NSDC can confirm that some early and limited discussions have taken place with the Applicant at the Pre-application stages on the ways in which the economic benefits of the development (through job creation) could be secured (should permission be forthcoming). Moreover, we have recommended that the Applicant consider how they can work with other Applicants for other projects in the Nottinghamshire and Lincolnshire region to deliver such benefits. We note that this and other measures are presented in the Outline Skills, Supply Chain and Employment Plan (OSSCEP).

14.4. Without prejudice to any view that NSDC may take on the proposed development, this should be developed further during the examination stage, such that NSDC can understand the benefits of the proposed development in respect of potential job creation at the district level and how such potential jobs can be secured as direct and tangible employment on either a temporary or permanent basis.

### **Local Policy**

14.5. Core Policy 4 of the Amended Core Strategy – Shaping our employment profile, seeks to strengthen and broaden the economy of the district and provide a diverse range of opportunities. The OSSCEP should be developed further to demonstrate how working with learning and training bodies, job centres and higher education to raise workforce skill levels can raise and improve employability. Noting the greatest beneficial impacts would occur in the construction stage and only very minor operational benefits, in order to demonstrate compliance with Core Policy 4, the mechanisms for delivery to ensure the benefits are deliverable, are an important part of the examination process.

## 15. Summary and Conclusions

- 15.1. The purpose of this Local Impact Report has been to outline the likely effects of the One Earth Solar Farm at a local level and to briefly evaluate these effects in the context of local planning policy and not to come to an overall balanced conclusion which is the responsibility of the Examining Authority.
- 15.2. Newark and Sherwood District Council (NSDC) note the need for Renewable Energy development and the wider benefits that this brings, but there are some specific and direct negative impacts associated with the proposed development including landscape and visual impacts, leading to a marked change in the character of the area and the loss of Best and Most Versatile Agricultural Land.
- 15.3. In addition, there are impacts around the potential loss of trees, impacts on residential amenity which are not considered to be properly understood at this time and require further work to be undertaken to understand and quantify those impacts.
- 15.4. NSDC will continue to work proactively with the Applicant during the examination to understand the full impacts of the proposed development, including evidence of necessary mitigation to address any significant impacts, including the joint production of Statements of Common Ground.
- 15.5. NSDC has not undertaken a full review of the draft Development Consent Order at this stage and will suggest any necessary amendments at the appropriate time during the Examination.