

THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010

COTTAM SOLAR PROJECT

**WRITTEN REPRESENTATION ON BEHALF OF EDF ENERGY (THERMAL
GENERATION) LIMITED**

DEADLINE 1

17 OCTOBER 2023

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WRITTEN REPRESENTATION ON BEHALF OF EDF ENERGY (THERMAL GENERATION) LIMITED

1. INTRODUCTION

- 1.1 EDF Energy (Thermal Generation) Limited (“**EDF**”) is an Affected Person for the purposes of the Planning Act 2008 and the Infrastructure Planning (Interested Parties) Regulations 2010, as its land is subject to proposed compulsory acquisition rights by the applicant, Cottam Solar Project Limited (the “**Promoter**”). The Book of Reference (APP-020) identifies plots 18-385, 19-390, 19-391 and 19-392 as land owned by EDF over which compulsory acquisition powers to acquire new rights and imposition of restrictions are sought. As such, EDF is an Interested Party by virtue of being an Affected Person as defined by s. 59(4) of the Planning Act 2008.
- 1.2 EDF made a submission on 31 March 2023 in order to protect its existing assets (AS-002). EDF owns the Cottam Power Station, a coal-fired power station in close proximity to the proposed Order Limits, through which part of the proposed cable corridor of the Cottam Solar Project (the “**Proposed Development**”) will run.
- 1.3 EDF does not object in principle to the Proposed Development. EDF recognises the potential benefits of the Proposed Development for the local and national energy supply and supports the principle of co-locating renewable and low-carbon energy generation facilities where possible.
- 1.4 EDF does, however, object to:
- 1.4.1 the Proposed Development being carried out in close proximity to its (and third-party owned) assets unless and until suitable protective provisions and/or related agreements have been secured to its satisfaction (discussed further at section 4 below); and
 - 1.4.2 any compulsory acquisition powers for land, rights or other related powers being involved which would affect its interests and apparatus (and third-party owned assets). This is unless and until suitable protective provisions and/or related agreements have been secured to its satisfaction.

2. THE COTTAM POWER STATION AND EDF’S ASSETS

- 2.1 Cottam Power Station (the “**Station**”) is a decommissioned coal-fired power station undergoing demolition which is in close proximity to the proposed Order Limits. A plan of the site owned by EDF is included at Appendix 1 to this Written Representation.
- 2.2 The Station ceased generating in 2019 and EDF is responsible for the safe decommissioning and demolition of the Station assets. Decommissioning is now complete with demolition expected to be complete in Q1 2026. In this context, EDF notes that, if granted consent, construction of the Proposed Development is expected to start in Q4 2024 with construction taking an estimated 24 months (running to Q4 2026) (APP-039). As such, the early stages of construction of the Proposed Development would overlap with demolition of the Station.
- 2.3 EDF will require appropriate protection to ensure that the Proposed Development does not jeopardise continuing operations or site demolition. EDF’s rights of access to inspect, maintain, renew and repair infrastructure must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted.
- 2.4 The site continues to house critical live infrastructure for both National Grid and the adjacent Cottam Development Centre (“**CDC**”) which is owned and operated by Uniper. There are land

agreements in place for the following third-party critical infrastructure housed at the site which the cable for the Proposed Development crosses:

- 2.4.1 A make-up and purge line, owned by Uniper, which supplies the CDC;
 - 2.4.2 A 400kV underground electricity cable and gas pipeline owned by Uniper;
 - 2.4.3 Underground and overground cables owned by National Grid;
 - 2.4.4 Cables owned by Western Power Distribution; and
 - 2.4.5 Potable water supplies necessary for the Station.
- 2.5 EDF understand that discussions are ongoing between the Promoter and other third parties (including Uniper) in respect of the protection of this live infrastructure. However, EDF must also ensure that it can comply with obligations it has to these third parties. Any infrastructure or operations associated with the Proposed Development must protect this third-party infrastructure and be undertaken in full compliance with the terms of the existing legal agreements and obligations entered into by EDF.
- 2.6 A site separation agreement has been finalised with Uniper. Site separation discussions are ongoing with National Grid and are expected to be progressed by the end of 2023. Any infrastructure or operations associated with the Proposed Development must not negatively impact or hinder these site separation discussions.

3. FUTURE DEVELOPMENT

- 3.1 Bassetlaw District Council submitted the Bassetlaw Local Plan 2020-2038 and associated documents to the Secretary of State on 18 July 2022 for independent examination, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012. This followed three rounds of consultation on the draft Local Plan between September 2021 and June 2022.
- 3.2 The Bassetlaw Local Plan 2020-2036 designates a new “Cottam Priority Regeneration Area” (Policy ST6) which includes the Station site. A masterplan for the wider site (the Cottam Priority Regeneration Areas Masterplan) is to be created and agreed with the Council and other parties. A masterplan was prepared to inform the development of the draft Bassetlaw Local Plan, and this is included as Appendix 2 to this Written Representation.
- 3.3 EDF wish to ensure that the regeneration of the Station and the wider area is facilitated in line with the Council’s requirements and ambitions. It is therefore imperative that the proposed cable route of the Proposed Development does not sterilise development land or detract from future development plans.
- 3.4 To ensure that the proposed cable route of the Proposed Development does not impact on future development at the Station, EDF considers that a requirement should be imposed within the draft Development Consent Order (“**dDCO**”) requiring the subsequent approval of the final cable routing by Bassetlaw District Council with EDF as a named consultee in respect of such an approval.

4. PROTECTIVE PROVISIONS

- 4.1 EDF considers it necessary for the protection and continued safe operation and future demolition of the Station that protective provisions be included within the dDCO. It is EDF’s position that protective provisions are necessary and reasonable to avoid an adverse impact on and serious detriment to EDF’s existing (and future) operations and to ensure that the Station can be safely demolished.

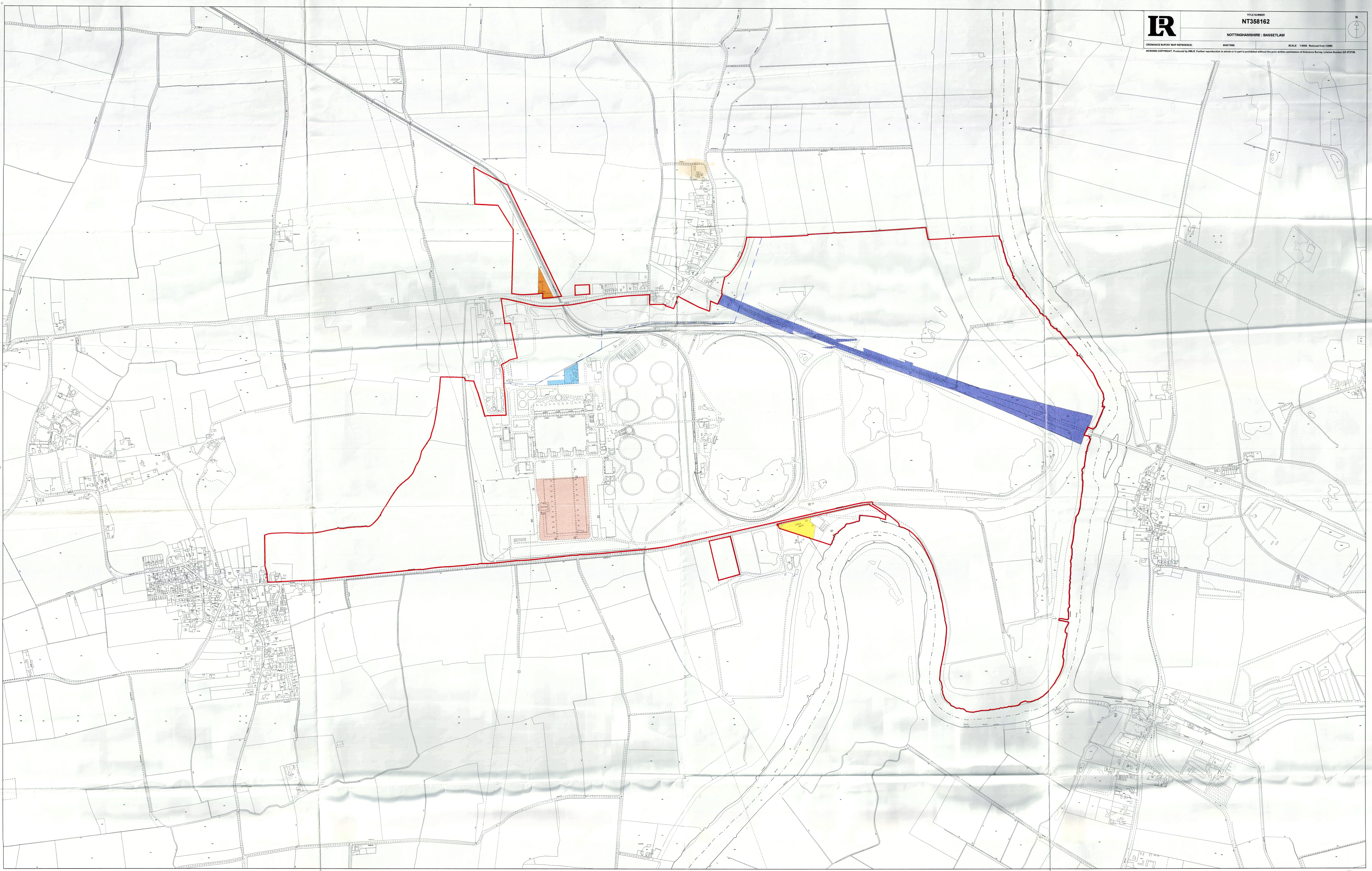
- 4.2 EDF are engaging with the Promoter as to the content and form of the proposed protective provisions, and, as such, the dDCO does not yet contain agreed protective provisions for the protection of EDF to EDF's satisfaction.
- 4.3 EDF will continue to engage with the Promoter on protective provisions. Should it not be possible to reach agreement with the Promoter, EDF reserves the right to attend a Compulsory Acquisition Hearing or Issue Specific Hearing to address the required format of the protective provisions and any necessary amendments to the dDCO.
- 4.4 EDF reserves the right to provide the Examining Authority with further written information in relation to any detailed issues remaining in dispute (regardless of whether noted in this submission) between EDF and the Promoter at subsequent Deadlines.

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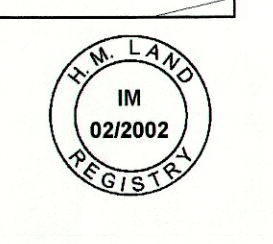
For and on behalf of EDF Energy (Thermal Generation) Limited

17 October 2023

Appendix 1
Site Plan of Cottam Power Station



This office copy shows the state of the title plan on 21 February 2003 at 13:21:33. It may be subject to minor distortions in scale.
Under s113 of the Land Registration Act 1925, this copy is admissible in evidence to the same extent as the original.
Based on 21 February 2003.
This title is dealt with by the Nottingham (East) District Land Registry.



Appendix 2

Masterplan of the Cottam Regeneration Site (to inform the development of the draft Bassetlaw Local Plan)

EDF Power Station Cottam

Vision & Delivery Statement
February 2020

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1. Introduction

1.1. Introduction

1.1.1. This Vision Document is prepared on behalf of EDF for 357 hectares of land at Cottam Power Station, Nottinghamshire. It sets out an analysis of both the site's context and content in respect of its key features and attributes, specifically considering how development could respond to these features in an appropriate and deliverable way. Its overarching aim is to show how a context-led design approach can shape development in a positive way that allows it to assimilate successfully. The document demonstrates the sustainability, suitability and deliverability of the site to accommodate residential development (circa. 1,600 dwellings) and essential community facilities (Primary School and Local Centre), employment land and an expansive network of green infrastructure and public open space which includes a retained wildlife site. This statement provides:

1.1.2. **At Section 2;** an evaluation of the site and its context including an analysis of constraints and opportunities;

1.1.3. **At Section 3;** a vision and a number of conceptual principles that could shape future development within the site that is both deliverable and assimilates successfully within its context;

1.1.4. **At Section 4;** a summary of the site's deliverability and capacity

1.2. EDF

1.2.1. The Site ceased generating power in September 2019 after more than 50 years of active service as a coal-fired power station. The Site formally closed down and disconnected from the national grid on 30 September 2019.

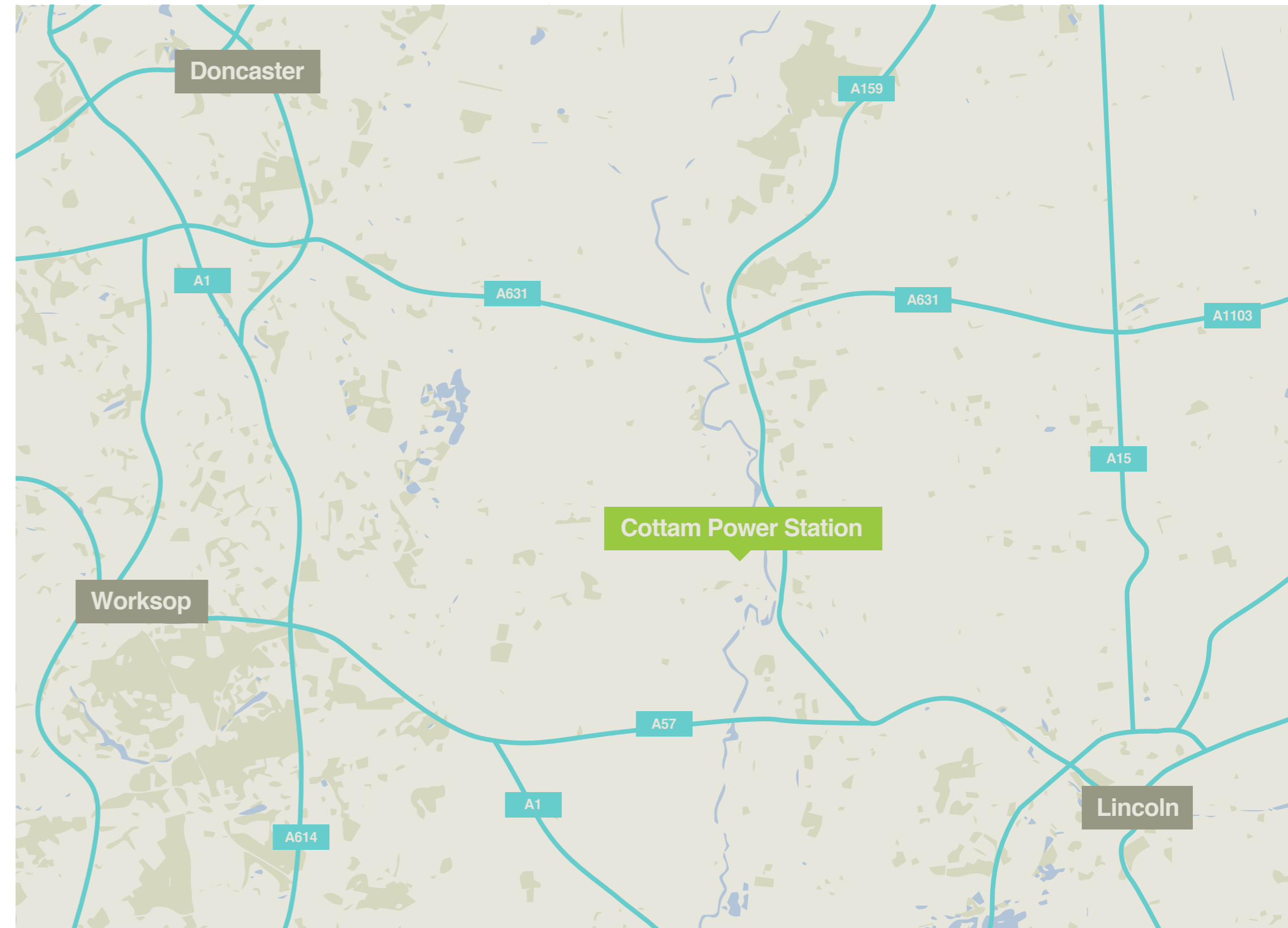
1.2.2. EDF has commenced the process of decommissioning the Site including the dismantling and removal of all power generating infrastructure which must be completed before any demolition or redevelopment work could commence. EDF is now seeking to promote the long-term future of the Site at Cottam as a deliverable large rural settlement that has potential to deliver a significant quantum of new homes, local services, employment accommodation, green infrastructure and leisure opportunities.

1.3. Planning Overview

1.3.1. Bassetlaw District Council is currently consulting on the Draft Bassetlaw Local Plan 2020, which will set the local planning policy framework up to 2037. The site at Cottam has been identified as a strategic regeneration opportunity that can deliver a new large rural settlement. The emerging policy aligns with the strategic development objectives within the National Planning Policy Framework including making effective use of land and bringing brownfield land back into use, following the principles of sustainable development.

1.3.2. Following conclusion of the current consultation in February 2020, the Council anticipates a final period of consultation in late summer 2020 before submitting the Local Plan to the Secretary of State for independent examination by the end of the year. Following the examination, the Council expects the new Local Plan to be adopted in late 2021.

Figure 1 Location Plan



2. The Site

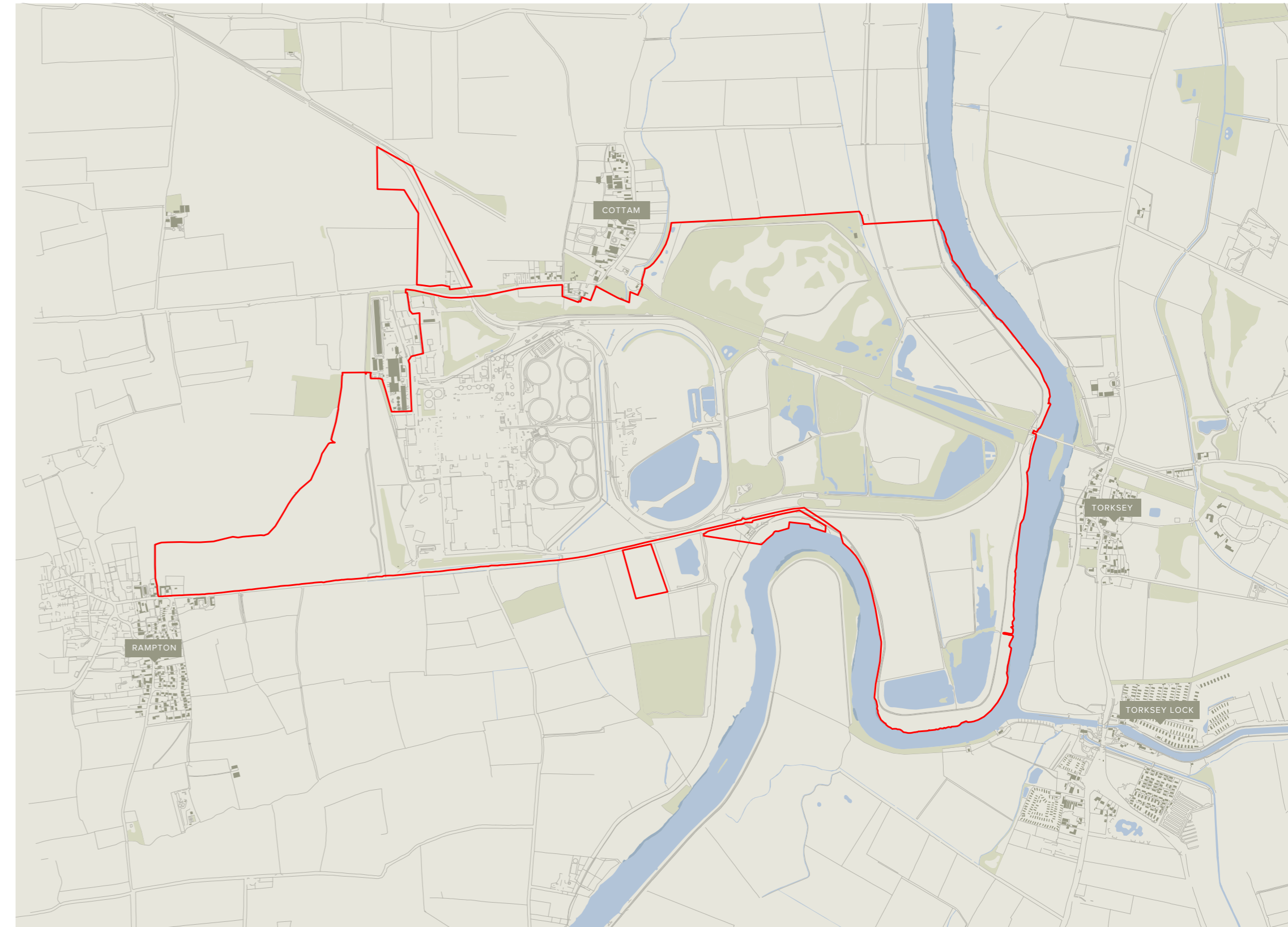
2.1. Context

2.1.1. The site is located in the unitary administrative area of Bassetlaw District Council (BDC) as part of the current consultation regarding the Draft Bassetlaw Local Plan (DBLP).

2.1.2. Comprising of mainly arable land it is situated at the eastern edge of Nottinghamshire on the west bank of the River Trent at Cottam near Retford. The larger coal-fired station, was decommissioned by EDF Energy in 2019 in line with the UK's goal to meet its zero-coal power generation by 2025. The smaller in-use station, owned by Uniper, is Cottam Development Centre, a combined cycle gas turbine plant commissioned in 1999. EDF is now seeking to promote the long-term future of the Site at Cottam as a deliverable large rural settlement that has potential to deliver a significant quantum of new homes, local services, employment accommodation, green infrastructure and leisure opportunities.



Figure 2 Redline Boundary



2.2. Movement & Access

2.2.1. Local Highway Network

2.2.2. The A57 to the south of the site serves vehicular traffic into Cottam via Laneham Road. To the east, the A156 runs adjacent to the River Trent, however is only accessible to pedestrian movement via the footbridge. To the north, Cottam Road takes you through Fenton and Saundby villages before reaching the A631.

2.2.3. Public Transport

2.2.4. Bus service that pass close to the site (within walking distance) run via Treswell and Rampton to the south west of the site. The level of bus provision locally is conveniently close and commute time services could potentially be improved through patronage from this development.

2.2.5. Public Rights of Way

2.2.6. There are several sections of Public Right of Way (PRoW) throughout the site, running the eastern perimeter adjacent to the river and connecting Retford Road and Cottam Road adjacent to the Uniper building. A third section that is currently not accessible to the public will potentially be made available via the development which connects Cottam village to Torksey via the pedestrian footbridge. These will all need to be consideration in the masterplan process.

2.2.7. Facilities

2.2.8. Within the local area, the town of Rampton provides access to the All Saints Church, a small convenience store, and the Eyre Arms public house. The nearest Primary school is found in Rampton, with Leverton C of E Academy and The Orchard co-educational day school in neighbouring South Leverton.

2.2.9. Site Access

2.2.10. The site benefits from a length of frontage to public highway along the northern edge (Cottam Road) and can deliver two points of access. One servicing potential employment usage with a second providing access to residential development.


2.2.11. Off-site works may be required by means of CIL or Contribution to identified County schemes. The sensitivity of traffic impact on the local road network would be examined in detail with the County Highway Authority.


LEGEND

 EDFE boundary

Movement

 Main A Road


 Secondary B Road

 Bus Stops

Public Rights of Way

 Footpath

 Bridleway

 Byway Open to All Traffic

 Recreational Route

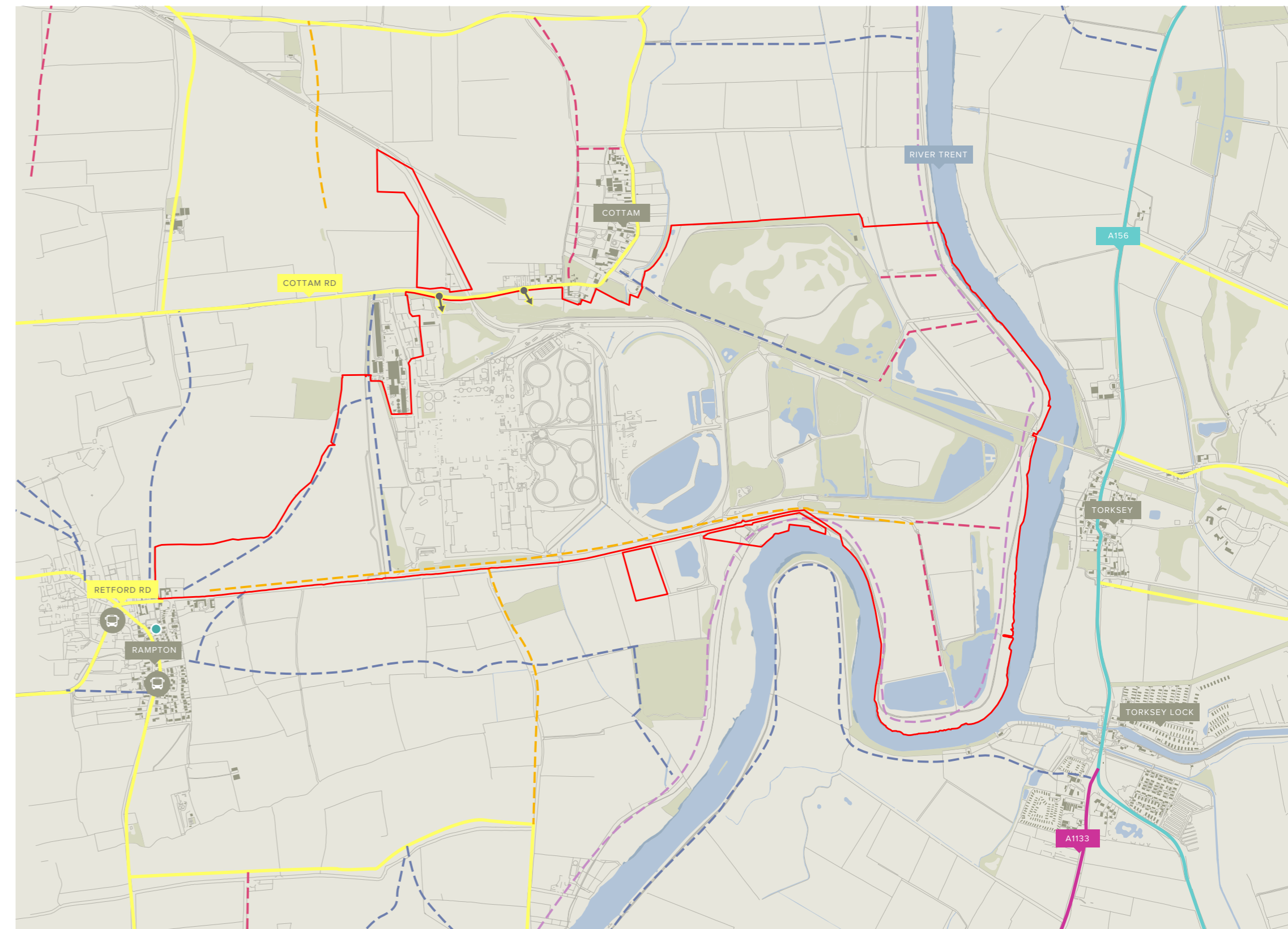
Access

 Vehicular Access

Facilities

 Retail

Figure 2 Movement & Access



2.3. Ecology and Biodiversity

2.3.1. Two Biological Sites of Importance (BSIs) occur with the study area. The largest of these (c.91ha) is Cottam Wetlands BSI, which encompasses the majority of South Lagoon (also a small portion of the Northern Lagoon) and wetland habitats with associated grasslands in the meander loop of the River Trent south of the site. This site has been designated for its wetland habitats and avian interest (notably waterfowl and wading birds). Cottam Ponds BSI occurs at the eastern end of North Lagoons and encompasses former ash settlement lagoons where vegetation has been allowed to regenerate and colonise former operational areas of the site.



2.4. Flood Risk

2.4.1. The site is identified to be in Flood Zone 2 with areas surrounding the site and immediately adjacent to the River Trent in Flood Zone 3. The site is protected by Environment Agency flood defences on the western side of the River Trent from combined fluvial and tidal events.

2.5. Utilities

2.5.1. In connection with the Uniper Development Center are several development constraints that have been identified on the plan opposite (gas and water mains that supply the building, together with overhead powerlines that run due north and south from the National Grid substation).

2.5.2. A flood embankment and drainage watercourse, the Seymour Drain, runs vertically through the site. The flood embankment is approximately 2.5m in height;

LEGEND










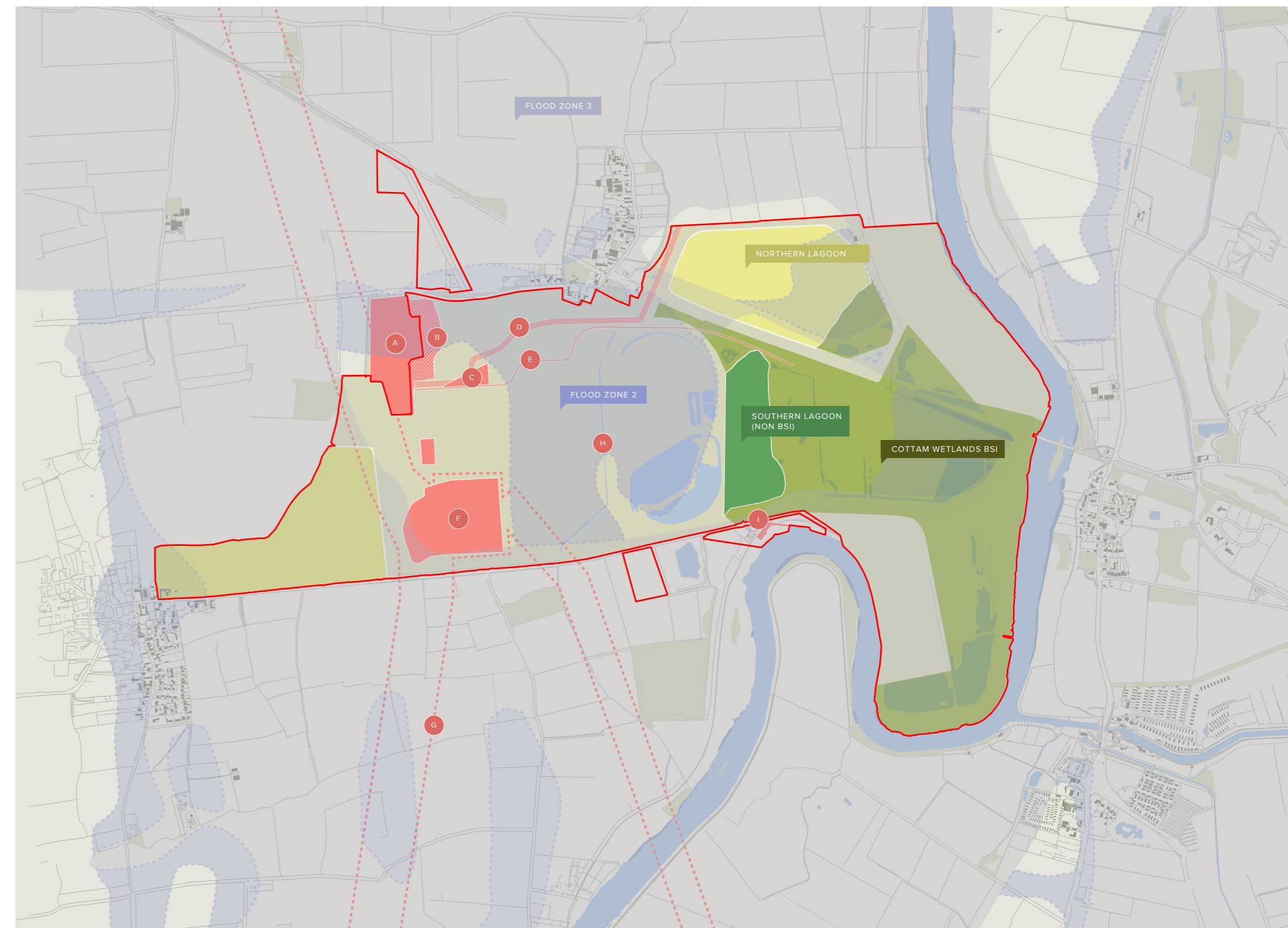
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|---|--|---|--|
|  | EDFE boundary |  | A: Uniper UK Ltd |
|  | Residential development (c.1600 homes) | | B: Uniper expansion area |
|  | Flood Zone 3 | | C: PRS |
|  | Flood Zone 2 | | D: Gas main |
|  | Cottam Wetlands BSI | | E: Water main |
|  | Northern Lagoon | | F: Substation |
|  | Southern Lagoon (Non BSI) | | G: Overhead powerlines |
|  | Infrastructure to be retained including underground services | | H: Seymour drain |
| | | | I: National Grid/UNIPER/EDFE rights to get access to the river |

Figure 3 Site Constraints



3. Concept



A well connected community embracing the site's natural assets providing living opportunities fit for the future, creating a highly desirable environment to live and play.

3.1. Our Vision

3.1.1. The vision is to reinvent the site as a sustainable place to live, work, learn and play. The new community and its facilities would provide a welcome addition to the existing community at Cottam shaped by a new network of green infrastructure that has nature at its heart whilst promoting health and well-being.

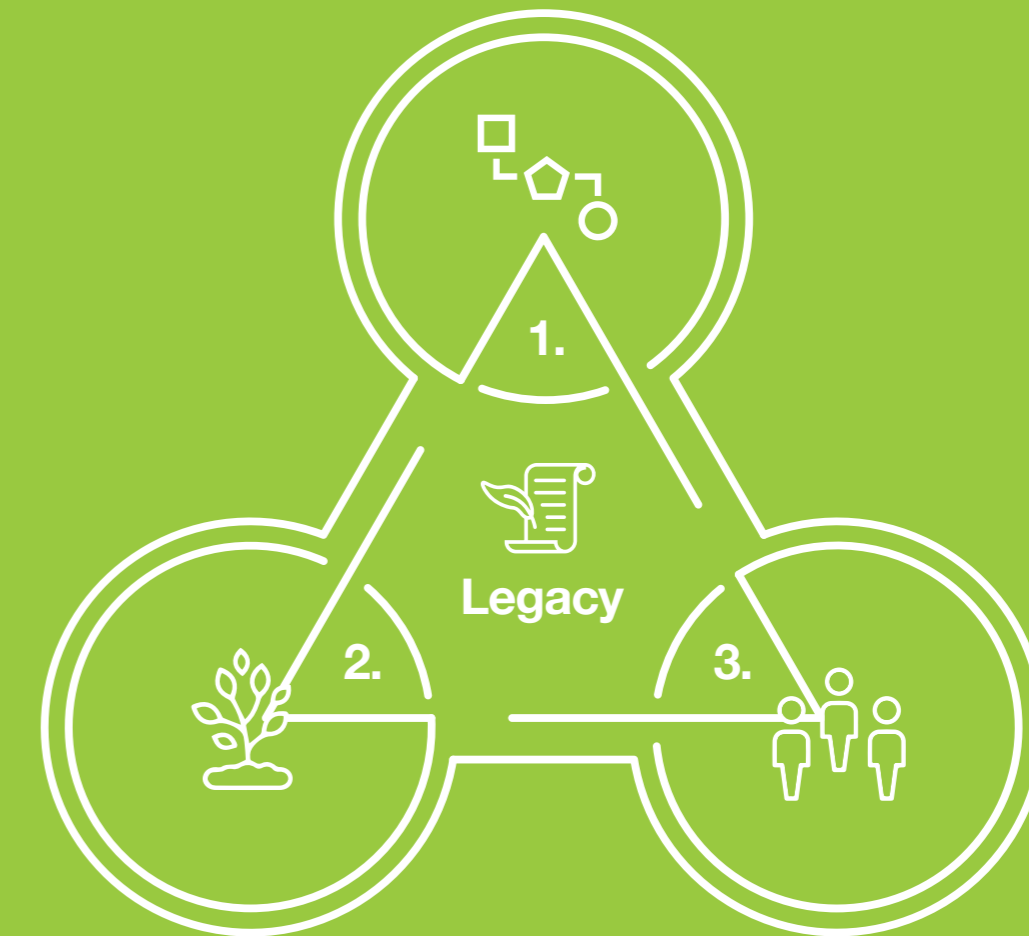
3.1.2. The proposals would result in a long-term legacy of:

Connecting the new and existing community to facilities and nature by sustainable means;

Enhancing a sense of community through creating positive social spaces, well overlooked streets and direct links to community assets;

Emphasising nature and the environment throughout the scheme and encouraging interaction with it through green movement corridors, parkland, play, enhanced biodiversity and grow zones.

3.1.3. The concept is the creation of a new green infrastructure that creates a sense of strong identity, that is connected to the wider popular network of spaces and is highly respectful of its context. It should also strive for the highest architectural, urban design and landscape architectural merit. Importantly, it should also promote the health and wellbeing and social cohesion as a core feature and designed with resilience to climate change. It achieves this through its three layers of connecting, community and environment to establish a positive long-term legacy for the site.



1. Connected

- Tangible commitment to design quality
- Integrated green infrastructure network
- Integration of existing woodland and hedgerows
- Exercise and sports routes and facilities
- Connected and sustainable drainage, hydrology, flood risk mitigation
- Biodiversity gain and support of ecological function
- Countryside links

2. Environment

- A walkable community
- Cohesive public realm strategy and hierarchy
- Social networks, connected public realm; integrated networks
- Livable streets and public space
- Enhance the links to public transport to promote their use
- Pedestrian and cycle connections

3. Community

- Mix of types, size, tenure, homes for all ages
- Design principles that respect, support and enhance biodiversity
- Walk / cycle/ public transport to work routes
- Access to existing popular community facilities and leisure routes

Design Actions

- A** Establish new green corridors that connect to a wider popular network of public right of ways
- B** To create a naturalistic green and blue infrastructure that promotes health and well-being
- C** Ecological assets are retained and enhanced for the community
- D** Create and effective movement routes through the site that connect with existing local infrastructure
- E** To connect with the existing community building adjacent to the site creating new improved spaces for the benefit of the wider community
- F** Provide around c.1600 new high quality dwellings
- G** Create loose, informal built form at more sensitive edges to allow built form to assimilate successfully into the landscape concept
- H** Provide new community and convenience facilities
- I** Potential Marina and waterside leisure and tourism uses
- J** Provide circa 15ha of employment/commercial space
- K** Potential rail halt/rail service improving sustainable transport links to the development



LEGEND

- | | |
|--|--|
| EDFE boundary | Vehicular access |
| Residential development (c.1600 homes) | Walking/cycling routes |
| Employment (circa 15ha) | Infrastructure to be retained including underground services |
| Local centre | A: Uniper UK Ltd |
| Primary School | B: Uniper expansion area |
| | C: PRS |
| | D: Gas main |
| | E: Water main |
| | F: Substation |
| | G: Overhead powerlines |
| | H: Seymour drain |
| | I: National Grid/UNIPER/EDFE rights to get access to the river |



4. Summary

4.1. Summary

4.1.1 This Vision Document concludes that land at Cottam Power Station does not have any known unresolvable constraints and is available, suitable and deliverable to provide residential development (circa. 1,600 dwellings), including local facilities, employment land, green infrastructure and open space.

4.1.2 It also confirms that a series of design principles responding to the site's context can shape a form of development that assimilates successfully and can promote a strong design and health and well-being legacy. It achieves this by being well-connected, promoting sustainable patterns of movement to local facilities, enhancing the existing community and encouraging social interaction, and by retaining and enhancing nature and the environment, and placing this as a central feature of the scheme, enhancing the communities interaction with it.



EDF
Power
Station
Cottam

DEFINE