

This matter is being dealt with by:

**Stephen Pointer**

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The Planning Inspectorate  
Examining Authority  
Cottam Solar Project

Sent by email to  
[CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

21<sup>st</sup> November 2023

Dear Sir/Madam,

**COTTAM SOLAR PROJECT  
EXAMINING AUTHORITY'S WRITTEN REQUESTS AND REQUESTS FOR  
INFORMATION (ExQ1)**

I am writing to respond to the third written questions issued by the Examining Authority on behalf of Nottinghamshire County Council.

Nottinghamshire County Council is responding to the following questions as referenced by the Examining Authority.

**1.2.5 Please explain the inclusion of Policies SO2, SO3, SO4, SO5 and WCS1 in paragraph 2.68 of the LIR [REP-086] as these appear to relate to the types of development which that plan is concerned with, i.e. waste, rather than other forms of development?**

Response: The County Council agree with the Inspector that Policies SO2, SO3, SO4, SO5 and WCS1 referenced in the LIR relates to waste development and so are not relevant for consideration. The policies from the Waste Core Strategy that are relevant include Policy WCS2: Waste awareness, prevention and re-use and Policy WCS10: Safeguarding waste management sites and should have been referenced in the LIR.

**1.2.21 Do the host Local Planning Authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they identify which cumulative developments have been omitted from which assessments and explain why they consider that they should be included.**

Response: In the time available to prepare this response, Nottinghamshire County Council has not had time to examine all the identified cumulative developments listed in each aspect chapter but if this has been restricted to other solar farm developments at or approaching examination stage, then it is omitting several emerging proposals of major

significance. The following developments within Nottinghamshire should be considered for inclusion:

- a) The proposed STEP project at West Burton Power Station [Finding STEP a Home](#)
- b) The Steeples Renewables Solar Project [The Site | Steeple Renewables Project](#)
- c) The North Humber - High Marnham project [North Humber High Marnham](#)
- d) One Earth Solar Farm [Home - One Earth Solar Farm](#)
- e) Great North Road Solar Farm [GNR Solar Park](#)

**1.9.4 Please confirm that the study areas identified in Section 13.4 of ES Chapter 13: Cultural Heritage [APP-048] have been agreed.**

Response: Nottinghamshire County Council believes that these were agreed with Lincs CC/LHPT who also provide planning advice for Bassetlaw DC. Nottinghamshire County Council was not involved in agreeing these study areas.

**1.9.19 Nottinghamshire County Council has expressed at paragraph 2.71 of its LIR [REP-086] that the Applicant's approach to archaeological mitigation 'seems vague and ill defined'. Please explain this comment.**

Response: The Cottam scheme, as it affects Nottinghamshire, involves a cable trench with associated easement topsoil strip where the scheme runs through fields, and a substation and connection into the National Grid on part of the site of the former Cottam power station. This is a rich landscape, where arable fields reveal archaeological remains through cropmarks identified by aerial photography. These remains appear as patterns in fields because of the differential growth of vegetation, particularly cereal crops, over buried features such as walls and ditches. This area of the Trent valley and floodplain show complex patterns of past riverine activity, with earlier channels of the river having deposited layers of alluvium and reworked areas of ground from the Late Palaeolithic onwards, both are processes which in some places still happen today. This in turn means that geophysical survey, often viewed as the acme of non-intrusive archaeological survey techniques, will work with variable degrees of success, further hampered by seasonal high ground water levels. Geophysical survey alone cannot define areas of archaeological significance and should not be relied upon solely or even mainly for identifying areas of archaeological mitigation.

The cable route west of the Trent follows a route to be shared by several NSIP schemes. Archaeological evaluation trenching followed geophysical survey in this area. Some areas of the proposed cable route have not been trenched and not all identified geophysical anomalies were sampled. Despite this, the evaluation trenching on this part of the scheme is significantly more appropriate than the areas of the Cottam scheme to the East of the Trent. Here it would appear significant areas of the development site have had no evaluation through trial trenching, which is unacceptable, and a major risk to the overall sustainable deliverability of the scheme. The LIR prepared by LCC archaeological advisers notes the inadequacy of the archaeological work to date, and NCC archaeology agrees.

The trial trenching of areas which have not shown geophysical anomalies should not be regarded as an optional extra, but as an archaeological requirement. While NCC archaeology do not work with percentage trial trenching as a standard at the outset of work, normal ranges for understanding complex landscapes, such as the Trent Floodplain and its adjacent higher ground, are found to be a minimum of 3-5% of the development

site evaluated through trial trenching, particularly including “blank” geophysical areas, with an additional element for contingencies.

The archaeological evaluation of the major part of the Cottam scheme - to the East of the Trent - was undertaken by different archaeological consultants from the cable scheme West of the Trent. The archaeological mitigation works for the cable route West of the Trent, whilst based on potentially inadequate evaluation work, involves a mix of preservation in situ through site avoidance and preservation by record. Please note; NCC archaeology prefer not to use the term “watching brief”. Strip, map and sample (SMS) is our preferred term and approach, and standard NCC policy is to see all easement strips subject to SMS.

This hopefully explains our earlier comment about the applicant’s approach to archaeological mitigation in the NCC LIR response.

**1.10.13 Would the Proposed Development deliver off-road parking provision, servicing and access arrangements in accordance with the Highway standards that the Highway Authority utilises. Please refer to those standards in your answer.**

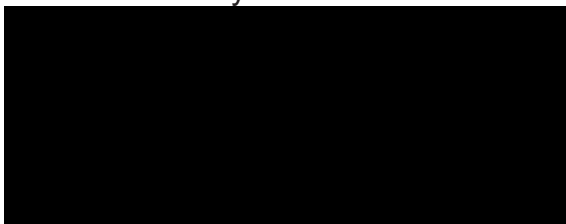
Response: In terms of the proposed development within Nottinghamshire, this will principally involve the construction and laying of the pipeline and associated maintenance. Access points for construction are described in 2.74 of our Local Impact Report and we are strongly supporting a shared cable corridor and access arrangements with other NSIP projects feeding into Cottam substation. Agreement has been reached with the Gate Burton promoter over the width of construction accesses and a reduced level of access for maintenance which would allow reinstatement of hedgerows etc and it is hoped that these will be common with other schemes. General standards are set out in the Nottinghamshire [Highway design guide](#) but given the proposed development is on lightly trafficked roads, arrangements for construction access/ splays etc can be varied. Unfortunately, at the time of writing this response, the local highway officer is on extended sick leave and it has not been possible to confirm specifically but if the proposal matches the agreed provision for access arrangements as developed by the Gate Burton scheme then it may be expected to be satisfactory.

**1.13.30 Can you further please explain paragraph 2.82 of the Council’s LIR [REP-086] in relation to Sturton Le Steeple Quarry and what is meant by a northern cabling route option in relation to the cable route that is proposed?**

Response: This is an error arising from a comment made in respect of earlier iterations of the Cottam and West Burton Solar Schemes when there were wider cable corridor options. The proposed cable route for Cottam does not affect the Sturton le Steeple quarry. Paragraph 2.82 should end after the second sentence.

I hope these responses are helpful.

Yours sincerely



Stephen Pointer MRTPI  
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Nottinghamshire County Council