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**Nottinghamshire
County Council**

The Planning Inspectorate
Environment Services Operations Group 3

Sent by email to
GreatNorthRoadSolarProject@planninginspectorate.gov.uk

7th December 2023

Dear Sir

GREAT NORTH ROAD SOLAR PROJECT SCOPING CONSULTATION AND NOTIFICATION

I am writing to respond to your letter of 9 November concerning the above. Nottinghamshire County Council is responding to the Scoping Report as follows:

Ecology

The County Council is generally satisfied with the proposed scope of survey and assessment as set out in the Scoping Report (specifically Chapter 6, Ecology, Ornithology and Biodiversity). However, I have the following observations:

For some reason, the Scoping Report hasn't detailed the Local Wildlife Sites occurring within 2km of the order limits, but it does note in section 6.3.1 that 31 such sites occur and that these will be presented in the PEIR and ES. The County Council would like to underline the importance of Local Wildlife Sites, which are of county-level importance for wildlife, and which are a key receptor when considering the potential impacts of this scheme.

The Council notes that survey work will take place across three seasons – 2022, 2023 and 2024. It is important that surveys are up to date, and the applicant should have regard to CIEEM's Advice Note on the lifespan of ecological reports and surveys (CIEEM, April 2019). Any deviations from what is set out in this Advice Note will need to be justified.

Regarding bats and potential impacts on this group, the applicant's attention should be drawn to recent research about the impact of solar PV sites on bats –Tinsley, E., Froidevaux, J. S. P., Zsebők, S., Szabadi, K. L., & Jones, G. (2023). Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology*, 60, 1752–1762. <https://doi.org/10.1111/1365-2664.14474>.

Local Flood matters

Section 7 of the document is noted. The promoters appear to follow all the relevant guidance and expectations. Notwithstanding the information contained in the submitted document, the County Council advises that wording such as 'the development must not increase the risk of flooding to the surrounding area' should be contained in the assessment.

Heritage and Archaeology

The scoping opinion identifies that NSDC archaeological advisors and conservation officers (historic buildings) having been consulted. We would request that Heritage and Archaeological Officers at the County Council should also be involved in the scope of proposed archaeological trenching etc as work has already been undertaken in respect of other Solar Projects in the Trent Valley within Lincolnshire Archaeology which ought to be mirrored.

The statement in para 3.1.6 concerning impacts on heritage assets beyond the study area, is considered premature since there is no LVIA ZTV with heritage receptors at this point to justify a statement of this nature. This does not follow the government guidance provided in EN 2 and EN 3.

The Great North Solar Park covers a significant area of central Notts, north of Newark, an area which is regionally significant for its density of cropmarks. These were recorded in the 1980's as part of the then English Heritage funded National Mapping Programme (NMP). We have this on our Historic Environment Record, but it is HE copyright. The promoters should obtain the data from HE, because without it they will inevitably underestimate the archaeological potential of the sands and gravels of the Trent Floodplain. The amount of visible archaeology decreases to the west of the area as the various areas proposed for solar arrays move up onto the Mercia mudstones, but successive recent archaeological evaluations in the area have revealed similar densities of archaeology, some highly significant. "Aggregates and Archaeology in Nottinghamshire" (Knight and Spence, 2013) identified that there were at least 7.34 archaeological sites per km² on the sands and gravels, a figure which is now well out of date and consequently a present day recalculation would be considerably higher.

The work to be undertaken will likely involve Lidar survey. For a scheme of such a scale it might be worth commissioning new, high accuracy Lidar.

2.5.1.1. No mention is made of archaeological investigation or mitigation in regard to the presumed impacts of the installation of the solar arrays. This is clearly incorrect.

The same point can be made for sections 2.5.1.4, 5, and 6.

Section 8.2 makes it clear that the County Council has not been consulted on the development so far. This oversight needs to be rectified so that both the archaeological advisor to N&SDC and the Nottinghamshire Archaeologist are fully involved in developing an appropriate approach to the archaeological investigations and mitigation.

At section 8.4.5 it is proposed to scope out archaeological issues under consideration of decommissioning the scheme. This needs to be scoped in. There are almost certainly going to be areas where archaeological sites will need to be preserved in situ, potentially

under array solutions that avoid ground disturbance. Decommissioning has the potential to be as destructive to archaeological remains as the original construction phase will be.

The summarised description of the archaeological potential of the proposal makes it clear that there is considerable potential for earlier prehistoric remains (including the internationally significant Late Upper Palaeolithic site to the South of the scheme at Farndon on geology similar to much of scheme). Standard evaluation techniques of geophysical investigation and limited trial trenching will almost certainly fail to find such sites, except serendipitously, and consideration should therefore be given to undertaking programmes of fieldwalking. Metal detecting might also help to locate sites associated with prehistoric, early Mediaeval and Civil War activity. Both techniques are worth using in this landscape. It might be worth the archaeological consultants considering the advice given in Knight and Spence 2013, see p. 41.

Highways and Rights of Way

The Highway Authority (HA) has reviewed the content of the Environmental Impact Assessment (EIA) Scoping Report (SR) dated November 23 submitted on behalf of Great North Road Solar. Chapter 11 of the report determines the extent of the traffic & transportation issues to be considered. The main areas considered are broad transport aspects, with limited detail provided.

A proposal of this scale and magnitude will have significant impact on the existing transportation network during the project's construction phase. Therefore, the HA will require a detailed Transport Assessment (TA) /supporting studies to assess the additional traffic & transportation demands. These should be prepared in accordance with current Planning Practice Policy, Nottinghamshire County Council's Design Guide and other industry accepted guidance on Transport Assessments (TA). The HA will need to consider the detail of the transportation impacts once the application is made and the need to secure any necessary mitigation measures through condition or planning obligation.

The TA should include the following information: -

1. Baseline appraisal data, key analysis parameters and assessment methodology should be agreed with the HA before the full TA work is undertaken.
2. The number, size and frequency of the vehicles that will be associated with the construction and completed – operational phases of the proposal.
3. The proposed routing of the construction vehicles from the principal highway network, including vehicle tracking where necessary to show that the highway network can adequately accommodate construction vehicles access, egress and turning.
4. Details of the proposed temporary/permanent access(s) into the site, including achievable visibility splays, access widths, finished gradients, surfacing materials and drainage measures. The layout plan(s) should show the proposed access and its interface with the existing public highway network. This must be a topographical plan, accurately showing all street furniture/posts/trees/assets at a minimum scale of 1:500. Access arrangements and proposed highway improvements will require independent Stage I Road Safety Audit (RSA) to be undertaken in accordance with HD 19/15.
5. Details of the proposed parking / unloading / manoeuvring areas within the site during both the construction and operational phases by use of a comprehensive Construction Management Plan. (CMP)

6. Most temporary construction sites (expected to be mostly Agricultural field) should include proactive measures to prevent deleterious construction material and mud being transferred to the public highway i.e., Wheel wash facilities.
7. The reports should include detailed long-term management strategies to mitigate any negative transport impacts of the development and/to promote sustainable development.
8. The TA should include a chapter that deals with cable routing corridors and utility diversion/installation for National Grid connections.
9. Some sensitive rural roads will require condition dilapidation surveys prior to and after heavy construction work has been undertaken.

Please note this list is not exhaustive and the applicant will be expected to provide appropriate assessment information that reflects site conditions and its locality.

Furthermore, the HA reserves its right to vary its assessment requirements and the amount of detail required depending on the outcomes of the iterative transport evaluation process.

Rights of Way

The scoping opinion states that PROW outside of the adopted highway during the construction phase will be assessed as part of the Socioeconomics, tourism, recreational and land use chapter of the Environmental Statement

The County Council would like to make the point that all PROW are highways (whether they sit on the adopted network or run over private land) and should be considered as highways in the Transport Assessment. The Council does not agree this should be outside the scope of the TA, especially as there are so many PROWs (121 nos.) crossing and adjacent to the area. Please refer to the following guidance:

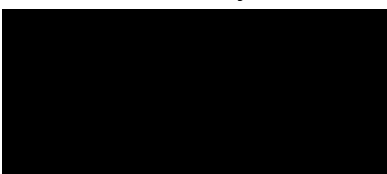
Public Rights of Way (RoW) are public highways and can be referred to as the minor highways network and are subject to the same legislation and regulations as the major highway network (roads and carriageways)

RoW can be temporarily closed to allow for construction/decommissioning as part of an application under a Temporary Traffic Regulation Order (TTRO), managed by the highway authority (Nottinghamshire County Council)

RoW can be permanently diverted (or extinguished) if the development cannot avoid them, under a Public Path Order (PPO). These require public consultation and should be discussed with the highway authority (NCC) at an early stage to avoid delaying the development. The orders should be made and confirmed prior to works starting on site

I hope these responses are helpful.

Yours sincerely



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