

COTMOOR SOLAR FARM.

PLANNING APPLICATION FOR THE CONSTRUCTION OF A SOLAR FARM AND BATTERY STATIONS TOGETHER WITH ALL ASSOCIATED WORKS, EQUIPMENT AND NECESSARY INFRASTRUCTURE.



STATEMENT OF COMMUNITY INVOLVEMENT





FULL PLANNING APPLICATION FOR THE CONSTRUCTION OF A SOLAR FARM AND BATTERY STATIONS TOGETHER WITH ALL ASSOCIATED WORKS, EQUIPMENT AND NECESSARY INFRASTRUCTURE

STATEMENT OF COMMUNITY INVOLVEMENT

COTMOOR SOLAR FARM

ON BEHALF OF JBM SOLAR PROJECTS 6 LTD.

Pegasus Group

Pegasus House | Querns Business Centre| Whitworth Road | Cirencester | Gloucestershire | GL7 1RT T 01285 641717 | F 01285 642348 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS



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1. INTRODUCTION

- 1.1 This Statement of Community Involvement has been prepared by Pegasus Group on behalf of JBM Solar Projects 6 Ltd. (the Applicant) in support of the accompanying planning application for the Cotmoor Solar Farm and battery stations together with associated equipment and infrastructure on land near to Halloughton, Southwell, Nottinghamshire (the Application Site).
- 1.2 This Statement supports the planning application for Planning Permission.

Proposed Development

1.3 This application seeks full planning permission for the following Description of Development:

"Construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure."

- 1.4 The Proposed Development would have a capacity of 49.9MW. Planning Permission is sought for a temporary period of 40 years from the date of first exportation of electricity from the site.
- 1.5 The onsite Substation will be required on a permanent basis, as the Substation will become part of the local electricity distribution network. Therefore, following the temporary 40 year period, the solar panels, battery stations and associated equipment will be removed however, the Substation and access to it will be retained on a permanent basis.
- 1.6 This Statement is prepared pursuant to Government advice to which applicants are encouraged to consult the local community in preparing development proposals to provide local people with the opportunity to shape new development in their area. Applicants are also encouraged to engage with Planning Authorities and other stakeholders in pre-application discussion.
- 1.7 This Statement therefore provides a full explanation of the pre-application consultation process and is accompanied by appendices which contain evidence of the consultation process undertaken by the Applicant and documents the outcome of the feedback from respondents. The Statement also sets out how these responses have been taken into account.



- 1.8 The role of pre-application discussions is not to seek to persuade or cajole people into supporting a project or application; rather it is to provide appropriate opportunities and environments within which people can communicate their concerns, or aspirations about the proposed development. Those issues and aspirations are recorded and reported to those who are engaged in designing the development project, or who are directly involved in the decision-making process.
- 1.9 This Statement takes the following form:
 - **Section 2** looks at Planning Legislation, and Planning Policy and Guidance relating to Community Engagement;
 - Section 3 outlines the consultation process undertaken by the Applicant;
 - **Section 4** details a summary of the consultation responses received and how they have been taken into account.



2. PLANNING POLICY FRAMEWORK

- 2.1 The main planning policy references for pre-application community consultation relevant to the proposals are:
 - The National Planning Policy Framework (NPPF), published February 2019;
 - The National Planning Practice Guidance web-based resource (NPPG), first published 6th March 2014, with updates.

National Planning Policy Framework (NPPF) (February 2019)

- 2.2 The NPPF sets out the national planning policy for the delivery of sustainable development through the planning system.
- 2.3 In addressing the need for pre-application consultation, paragraph 39 of the NPPF states:

"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."

2.4 Paragraph 40 sets out the roles of local planning authorities, stating:

"(Local planning authorities) should, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications."

2.5 The applicant is therefore encouraged to provide evidence of how the community have been involved in pre-application discussions concerning the proposed development.

National Planning Practice Guidance (NPPG)

- 2.6 The NPPG web-based resource further raises the importance of consultation in the planning process, in particular the desire to "front-load" consultation in the form of pre-application discussions.
- 2.7 The NPPG outlines in detail the consultation process which Local Authorities must follow during their determination of planning applications.



3. THE COMMUNITY CONSULTATION PROCESS

- 3.1 The Applicant had intended to hold a public consultation event in Halloughton in March 2020; however, this was postponed due to Covid-19. Following postponement of the planned public consultation event, a website-based consultation approach has been undertaken.
- 3.2 A website (https://www.halloughtonsolarfarm.co.uk/) (see Figure 1) was set up which provided the initial plans which would have been on show at the public exhibition event. The website also provided an email and postal address for any comments to be sent to. Additionally, an online form was included on the website, where any comments submitted would be easily accessed by members of the development team.



Figure 1: Website homepage.

3.3 To advertise the proposed development and the online approach to consultation, leaflets were distributed to c. 1,140 properties and businesses within a defined area on Wednesday 22nd April 2020. The area of distribution was defined having regard to those residents and businesses which have a direct interest in the Proposed Development. The extent is shown in Figure 2. While a copy of the consultation leaflet is included as **Appendix 1**.





Figure 2: Leaflet Distribution Area.

- 3.4 In addition, letters enclosing the leaflet were distributed to the following parties:
 - · Councillor Malcolm Brock;
 - Councillor Penny Rainbow;
 - Councillor Peter Harris;
 - Halloughton Parish Council;
 - · Southwell Town Council;
- 3.5 The website provided information regarding the proposals, including background information and context to Solar Farm developments in general.
- 3.6 The preliminary development proposals were set out on the website. The material included a Site Location Plan, Initial Site Layout and photo viewpoints/ photomontages of the site from nearby locations to the application site (as featured in the accompanying Landscape and Visual Impact Assessment).
- 3.7 Both the website and leaflet emphasised the methods available to contact the development team with any questions or comments regarding the Proposed Development. In addition, the opportunity for one-to-one discussions with the development team were also offered by phone or video conferencing given Covid-19 restrictions.
- 3.8 On 13th May 2020, following the first three weeks of the consultation, an additional leaflet was issued to the same addresses as before via post. The second leaflet was



also emailed to all those who had already responded to the public consultation via email or the online feedback form on the website. The second leaflet provided detailed answers to a series of the frequently asked questions which were received during the first three weeks of the consultation. This leaflet also confirmed that in order to allow plenty of time to respond to the consultation, the consultation period had been extended until Sunday 24th May 2020. A copy is enclosed in **Appendix 2**.

- 3.9 In total, 56 comments were received through the online form and via the email address.
- 3.10 All comments received were reviewed and responses clarifying any points or queries were sent out to individuals where required.
- 3.11 During the Consultation period, Southwell Town Council provided comments on the proposed development and also requested a meeting to discuss the application in detail. On 19th May 2020, JBM Solar, Pegasus Group and Southwell Town Council met via a 'Zoom' meeting to discuss the proposed development and answer any questions from the Councillors.



4. CONSULTATION RESPONSES

- 4.1 The aim of the consultation was to provide local residents and stakeholders with the opportunity to comment on the potential new development proposals, to establish general views on the proposals including to raise any concerns that might otherwise have been missed and to make any further suggestions to improve the scheme.
- 4.2 The responses include a range of views. A number of respondents expressed support for the scheme, noting the need for green energy. Further responses provide comments and/or express objection to the proposals. The main themes from these can be summarised as:
 - Potential Visual Impacts;
 - Potential Noise Impacts;
 - Biodiversity and Trees/Hedgerows;
 - Flood Risk; and
 - Public Rights of Way;
- 4.3 A transcript of the responses is provided at **Appendix 3**.
- 4.4 The responses received from the public consultation have been considered as the application proposals have been finalised in the preparation of the accompanying application. Table 1 below provides a summary of the most common matters raised and details the applicant's response.
- 4.5 It is acknowledged that pre-application consultation will not always change the views of those who wish to object to a development proposal, but it ensures that there is an opportunity to openly review and discuss the proposals with the developers and their consultant team and to help shape new development.
- 4.6 Where possible the concerns raised have been considered and where appropriate addressed through the application revisions since the undertaking of the public consultation event and detailed within the supporting documentation.



Consultation Comment	Applicant Response
Public Rights of Way	The Public Rights of Way which pass through the site will be retained in their current route and access will always remain available. A scheme of landscaping along the Public Rights of Way has been added following public comments as part of the application.
Construction Phase	Access will be taken from into the field at the eastern end of Halloughton. All traffic will be routed from the A612 and will not pass through the village. The proposals have been designed to specifically avoid using the road into Halloughton. Construction of the solar farm will take around six months in total.
Operational Phase	Once the solar farm is operational there will be very little traffic. Maintenance visits will be limited to around 20 a year and will be undertaken by transit sized vans.
Potential Noise	The construction is expected to take place over approximately six months, therefore any potential noise from the construction period will be limited to a relatively short period of time. The construction phase will be subject to management measures to ensure it is undertaken without causing undue harm to the amenity of local residents. Once operational the only items on the site which will generate any noise are the inverters, battery stations and the Substation. In order to make sure that there are not audible at the site boundary these items have been positioned a sufficient distance away from the site perimeter. In addition, a full noise impact assessment has been prepared to accompany this planning application which includes mitigation.



Consultation Comment	Applicant Response
Visual Impacts	Views of the development will be possible from some of the surrounding footpaths and roads. Additional planting has been proposed at key points around the site to minimise any views in the long term. This planning application is accompanied by a Landscape and Visual Impact (LVIA) confirms that the proposed development has been designed to help comply with the relevant policies relating to landscape character, and the need to protect and enhance local landscape features and improve biodiversity. The layout of the Solar Farm was revised following the public consultation to step back the security gate and fencing at the access point (Bridle Road Farm) to the edge of the Solar Farm. A traditional farming gate will be installed at the access thereby minimising visual impacts of the access improvements required and to retaining the traditional feel to the village entrance at the eastern end of Halloughton.
Ecology and existing trees/vegetation	No trees will be removed as a result of the proposed development. Small sections of hedgerow will require removal for access between fields, but additional trees and hedgerows will be planted in order to create further screening and biodiversity enhancements. This will result in a net biodiversity gain on site. Ecological surveys have been undertaken on the site to understand the wildlife which is present, and the proposals incorporate appropriate planning and seed mixes designed to support wildlife.
Flood Risk	The proposals have been designed to ensure that there is no increase in flood risk. Any runoff will be conveyed via swales and stored within an attenuation basin. A



Consultation Comment	Applicant Response
	detailed site specific Flood Risk Assessment and
	drainage strategy has been prepared to support this
	planning application.
	Additional swales and attenuation ponds have been
	included in the scheme following feedback from
	Southwell Flood Forum to increase the levels of
	betterment already proposed.

Table 1: Consultation Responses.



APPENDIX 1 CONSULTATION LEAFLET

PUBLIC CONSULTATION Halloughton Solar Farm

Pegasus Group, on behalf of JBM Solar Projects, is consulting with the local community on proposals for a new solar farm on land near the village of Halloughton.

Whilst we would usually hold an event locally so that the local community are able to view the proposals and ask questions to members of the development team unfortunately that just isn't possible at present. JBM had intended to hold a public consultation event in Halloughton in March and we have postponed any public consultation for one month in the hope that we would be able to hold an event locally but unfortunately this will not be possible given the current situation and may not be possible for some time. As a result we have taken the difficult decision to host a website based forum instead.

JBM Solar is committed to remaining open and engaged with the community during this process. In light of the unusual circumstances, we're offering anyone who would like to discuss the project the chance to have a one-on-one discussion with our development team, either by phone or via video conferencing. Please use the form on the website to get in touch if you'd like to arrange this.

A website has been set up to share the initial plans that would have been on show at the public exhibition event. The details of the proposed development can be accessed at : halloughtonsolarfarm.co.uk.

Comments provided by the local community will be taken into account in shaping the final planning application submission. Please provide any comments you have on the proposal by email or via the feedback form on the website.

Website: halloughtonsolarfarm.co.uk

Email Address: halloughtonsolarfarm@pegasusgroup.co.uk

All comments should be provided by 5pm on Friday 15th May 2020.









APPENDIX 2 2^{ND} CONSULTATION LEAFLET



HALLOUGHTON SOLAR FARM



We would like to thank those who have responded to the online consultation process to date for Halloughton Solar Farm. We have received a number of comments supporting the project and we are actively engaging with the local community and Councillors to address any concerns and provide a response to some of the questions which have been frequently. A number of these questions are outlined below and we would encourage anyone who has any additional questions to please contact us.

FREQUENTLY ASKED QUESTIONS

What will happen to the Public Rights of Way?

The Public Rights of Way which pass through the site will be retained in their current route and access will always remain available.

Will there be much disturbance during construction?

Access to the site will be taken from a gap in the existing hedgerow at the eastern end of Halloughton. All traffic will come from the A612 and will not pass through the village. Once the solar farm is operational there will be very little traffic. Maintenance visits will be limited to around 20 a year and will be undertaken by transit van size vehicles.

How long will it take to build?

It will take around six months to build the solar farm.

Once built will the development be noisy?

We understand that there are concerns over any noise generated by the proposals. The only items which generate any noise are the inverters and batteries. In order to make sure that these are not audible at the site boundary these items have been positioned a sufficient distance away from the site perimeter. A full noise assessment will be included within a planning application submitted to the local planning authority.

Will there be fencing around the site?

Yes, we propose that a stock fence will be put up around the site in order to keep it secure. The fencing will include gates that will allow small mammals to pass through.



Will I be able to see it once it's built?

Views of the development will be possible from some of the surrounding footpaths and roads. A comprehensive landscaping scheme is proposed so as to provide screening where necessary.

Will any trees or hedgerows be removed?

No trees will be removed. Small sections of hedgerow will require removal for access between fields but additional trees and hedgerows will be planted in order to create further screening and biodiversity enhancements resulting in a net biodiversity gain on site.

Will the development cause flooding elsewhere?

The proposals have been designed to ensure that there is no increase in flood risk. Any Runoff will be conveyed via swales and stored within an attenuation basin to achieve betterment. A detailed site specific flood risk assessment and drainage strategy will be submitted as part of the planning application to the LPA.

What about the wildlife which use the area?

We have undertaken surveys of the site to understand the wildlife which is present, and the proposals incorporate appropriate planting and seed mixes designed to support wildlife.

In order to allow plenty of time to respond to this consultation we have extended the consultation period until Sunday 24th May 2020 and we look forward to receiving any further questions which should be emailed to halloughtonsolarfarm@pegasusgroup. co.uk or alternatively these can be submitted via the form on the website a www.halloughtonsolarfarm.co.uk.

A Statement of Community Involvement (SCI) will be prepared at the end of the consultation period which outlines the various issues raised during this consultation period and how the Applicant has responded to and addressed those issues. The SCI will be submitted as part of the planning application to the LPA and will be published on their website for anyone to view.

WWW.PEGASUSGROUP.CO.UK

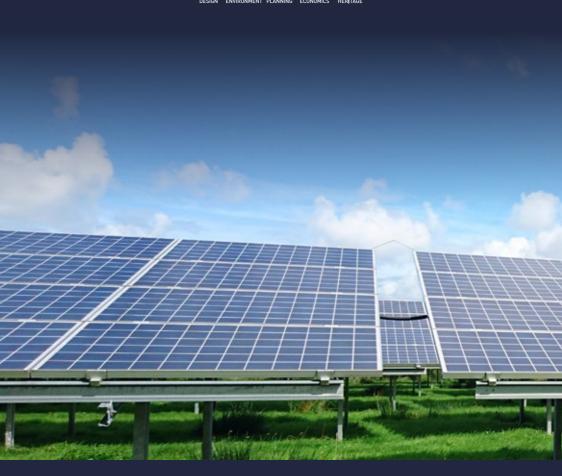














APPENDIX 3 PUBLIC RESPONSES



Ref	I have two questions / comments. Firstly, the access proposed from a field gate off the single track road at the end of the village (to be used by HGVs during the six months of construction) is totally unsuitable. The road is the only way into the settlement, used by all residents and farm traffic alike. It is not in any sense designed for heavy traffic. The HGV movements generated would be a significant highway hazard, and leaving and entering the village for local residents would become a stressful experience. Secondly, has the land for the development already been acquired? Can I ask the identity of the landowners involved?
2	I write as a local resident of 35 years standing, hence good local knowledge.
	I have two main questions for the moment (which I have also asked via your online form). However, I raise here one or two supplementary points to which I would equally welcome your response. The access proposed to the site via a field gate at the eastern end of Halloughton, before the junction with the A612, is totally unsuitable. In the 6 months of construction work there would be very many HGV movements on that stretch of the village street, for which it is not in any way designed. Do you have an estimate of how many?
	The traffic / highway hazard would be considerable, the entrance to the village would be despoiled, and entering/leaving the village for local residents would be both hazardous and stressful.
	Secondly, it is not clear what the current status of these proposals might be. Has the land for the development already been acquired? Could you let me know the identity of the landowners involved, since they must in some sense be involved in this proposal?
3	I have just seen your email address as posted on the parish noticeboard here in Halloughton. As you see, I've posted a couple of questions about the development via the website and also as below, in slightly modified form.
	However, since I now see you invite queries to be addressed to you also, I wonder if you could explain a little more the genesis of this proposal? I'm not clear at the moment whether this is your own proposal, based upon your own identification of the proposed site, or whether local landowners are your clients. Perhaps you might clarify.
	Secondly, could you tell me a little more about the time scale of this proposal? What is the nature of the time constraints involved? Your website seems to suggest, in relation to the public consultation aspect of the question, that there might be some.
	Finally, has any consideration been given to deferring consultation on the project until the current national emergency is over? However one looks at it, this is a large-scale proposal which if it goes ahead will have a major impact on the landscape around Halloughton, and it is surely essential that a full and thorough consultation of all interested parties, plus the views that emerge, be in the public domain. At the moment that is not possible. For my own part, I would urge that the project be postponed until such time as it becomes so.
4	I find it beyond belief that anyone could propose to build a solar farm next to a conservation area and in a highly populated are of rural Nottinghamshire. As I can see no engineering or logistical reasons for locating a large solar farm in the middle of one of the most attractive parts of the county, I suggest you withdraw the application and head off to the moors near Doncaster airport where there is an abundance of flat land with no habitation.
5	I'm in favour of using solar power for renewable energy so this plan is a good thing.
6	I am a neighbouring farmer to the North of your project.
	The plan attached to your Public Consultation document is too small a scale to be of any use and the colouring is unhelpful. Please forward two copies of a large scale map, showing the boundaries of the proposed farm. I would like paper copies of your plan, sent to redacted personal details
7	My questions are: Can you please tell me on the map where the overhead (?) power cables will run to take electricity from the site? What effect will the array have on the footpaths adjacent to the site? How long will the array be in operation, and as you refer to decommissioning, what is the recycling/disposal process? How many
	panels will there be? I also feel that as you are now consulting only electronically, there needs to be a wide leafleting campaign to raise awareness locally. I live just over the hill from the site (S of Oxton Road) and have had no notification. Can I be reassured re the reach of this consultation please?
8	I'm currently working from home at my parents home in Halam and so we received your flyer about the plans for a solar farm.
	I'm wondering if your solar energy is already accounted for, if it is successfully constructed?
9	We need a full and completely independent environmental damage report to be able to assess fully the impact of this scheme in an area of countryside importance. Details of biodiversity management and enhancement are meaningless if we wipe out an excellent diverse area with a mono culture structure helped along by a few sheep on over-managed grassland.
10	We considered this website to be lacking in detailed information given this is the resource for our comments.
	There was no mention of the amount of acreage involved; it looks substantial. No timescale for how long the potential solar farm will be there and what will happen when/ if it is decomissioned. Will further acreage be required in this area once it is agreed? Who owns this acreage? The imagery, maps etc were impossible to read when enlarged and so details and information could not be assessed properly. Obviously, we are concerned that a substantial amount of land is being considered for this solar farm in an area of beautiful countryside. Whilst we
	realise that solar power is the way forward we consider the area you are suggesting is too large and invasive to the surrounding area.



Ref	Comments
11	I have tried to submit this via your website but had no confirmation after pressing the submit button that it had worked. So I have copied it for this email.
	The main image of the proposed solar farm on your website is impossible to read properly. I have tried copying and pasting and then enlarging it but the detail and type is then too blurred to read.
	This is not an adequate image for a meaningful consultation. Please can you email me an image that is big enough to see the detail and writing.
12	Dear Sir, Madam,
	I would like to write to you on behalf of my elderly mother who lives in the village of Halloughton.
	I do not intend to discuss the pros and cons regarding your clients proposal at this stage, but must advise you that to ask for comments via video conferencing or by phone is wholly innapropriate whilst the country is in lockdown.
	My 80 year old mother is not in a position to discuss the finer technical or legal details of the matter with anyone on the phoneall communications must be formally put through the council in the normal planning processes and via public meetings/consultations. Video conferencing for her is also a "no go"like many of the elderly people with limited computer skills in this hamlet (especially with the poor broadband in Halloughton) this is also not a suitable form of communication.
	I believe that this matter should not be discussed or proposed until the corona virus pandemic is over when "normal" public consultations can be arranged. To continue such "Virtual" discussions at this point in time is wholly innapropriate, unfair and undemocratic. You appear to be taking advantage of an unfortunate set of circumstances to show that you are seen to be doing "the right thing" by communicating with the relevant community pre application, whereas in fact you are doing exactly the opposite!
13	I fully support this scheme. I would be proud to be living in an area where the government target to produce energy from renewable sources is being helped by the 50MW generated by Halloughton Solar Farm. The fields which form the development site are predominantly used for grazing and Miscanthus at present. It would be good to see extensive areas around the boundaries of the fields of panels left to long grass and wild flower meadows which do not exist at the moment. Good luck through the planning process.
14 15	Please send me copies of the plans in PDF format Whilst we support renewable energy in the form of Solar farms - having looked at the proposed plans for Halloughton Solar Farm we feel the area is far too large. Could this be scaled down? Also can you confirm the height of the Panels - we live in nearby village.
16	As a local resident and a supporter of Green Energy, I fully support this plan. I am familiar with the fields where the solar panels will go, as I walk each day on paths around Southwell. Apart from a few houses in Halloughton, the array will be visible only to walkers and a few cars on Stubbins Lane. They would not spoil the view - for example - of people approaching Southwell Minster (which was put forward as a spurious reason for opposting a wind turbine on land belonging to Nottingham Trent University at Brackenburst). Now that battery storage technology is improving, the UK MUST invest in solar and wind energy. Good luck to you.
17	This is not the time to conduct PUBLIC consultations, planning applications or similar when public democratic discussion is impossible. You appear to be taking advantage of the present worrying situation to push through a planning application involving a large industrial sight dominating a small rural village which is likely to lead to objections. The inhabitants are being treated as though they are a corporation with all technical facilities available, and not a small number of residents consisting of the general public, whose objections you hope can be overridden.
	Why such a huge area, what is the sudden urgency? The answer is obvious. As the UK green energy efforts will always be so small as to be irrelevant in the worlds scheme of things, this is just a money-making scheme for landowners at the cost of the rural surroundings of a village. More prime agricultural land covered in concrete. It seems we no longer need to produce food in this country despite the ever increasing population.
18	I am very much against the solar farm on the proposed site. Admittedly the proposals are a mere outline as of now and how extensive the final development will be in terms of using the whole site area, it is impossible to know. In any event it will be very significant at best, and absolutely enormous at worst. Any development on this site would be very noticeable In this prominent position, and would be objectionable. The whole area is criss crossed with foot paths, which might make the present free access difficult to maintain. You will doubtless have ecologists who will say that these extensive developments don't interfere with animal or avian wildlife. That would be difficult to be sure of however until they were built. Without such considerations however they would just look horrible too great a development and concentration of solar panels on rising land, close to housing developments from which they would be easily seen. I am afraid the development is just too much , too close and just ugly. The positioning if high tension cable to take the power from the site is somewhat uncertain on the plan, but wherever they are they won't add to the sites attractiveness.
19	Having lived in this beautiful area for many years, I strongly object to this development on beautiful rural farmland. It is close to a busy road and residential area. They are an eyesore and spoil the look of the countryside in this area.



Ref

Dear Pegasus, I am responding to your invitation. It was a difficult decision, I am sure, to scrap the public consultation event. It places a greater responsibility on you to be as proactive as possible in working with the local community prior to submitting your application. My views are as follows: At first glance it might be thought "Solar Power farm – got to be a good thing." And yes it clearly is compared

with.....? And that is the question. Which stimulates lots of questions:

- Why here
- Who benefits
- •Why of this scale
- Why not brownfield
- •And so on

JBM Solar's website states that they develop solar farms in the size range 5 - 60MW. It is solar power on an industrial scale. The largest of their showcased ones comes in at 54MW in Meath, Ireland. It spreads over approx. 200 acres. They made a €430,000 development contribution to the local authority ahead of the start of construction (something of interest to Newark and Sherwood District Council?). That development will power 13,000 homes and reduce CO2 by 27,000 tonnes per annum. So similarish figures should be expected from Halloughton if it goes ahead as a 50MW installation.

I start with "who benefits". Pegasus and JBM are there to act on behalf of the landowner(s) seeking planning permission for the solar farm. I have no idea who owns the land but recently had walked in the area of the proposed solar farm and saw what I guess was evidence of bamboo grown for biomass and pasture. I suspect solar panels offer the landowner an assured income stream coupled with considerably less work. There is a trade off between the interest of the landowner (who might otherwise have to sell up and leave) and the cumulative small impacts on lots of ordinary folk in Southwell and Halloughton and who are being consulted. What payments to local communities, comparable to Community Infrastructure Levy, are envisaged?

England as a nation state has commitments to meet certain CO2 reduction targets and there is no argument that this will be a small help in the right direction, but again the question is at what cost?

The proposal goes through the areas of cost – loss of agricultural land (in common with much of Nottinghamshire and, explaining the relative poverty of the county, the soil is not good). Culture (no effect as no buildings on the proposed site) Highways (no problem as site access separate and ongoing maintenance very light). Flood implications and ecology and biodiversity are areas of weakness in the proposal summary.

The Potwell Dyke is flooding more frequently with global warming. Part of the catchment of the Potwell Dyke is on the proposal site. If there is any risk whatsoever to increasing the risk of flooding downstream this must be removed as a precondition of any development. If Pegasus obtain written agreement from Via East Midlands and Trent Rivers Trust that under no circumstances will it contribute to flooding elsewhere then that would take care of that objection. Natural flood defences must be included from the outset with the ambition that risk is lowered cf the status quo. Risibly the proposal asserts that the land is not prone to flooding in itself, but they would be fools to build there if it did!

"The UK is now one of the most nature-depleted countries in the world" RSPB Nature's Home Summer 2020. And it is not surprising since wildlife and ecology is always at the back of the queue. And likely to get worse in future. The proposal summary shows painful lack of ambition. "The dumble is to be retained" "Surveys have been ongoing (really?) to identify constraints and opportunities for biodiversity enhancement". What I miss is a pro-active desire to bring about biodiversity enhancements. Some tangible examples would help, otherwise this appears to be just an exercise in box-ticking. Early involvement of, and an endorsement from, Notts Wildlife Trust and Brackenhurst NTU would seem like a bare minimum. With such an impartial endorsement we could all have more confidence.

Community consultation. The community at large will of course raise other objections like the urbanisation of a large tract of unspoilt countryside and the loss of good walking and cycling country. The paths may be 'retained', but to walk or ride between banks of regimented panels or hedge screening is hardly going to lift the spirits. Loss of visual amenity is clear and definite. During the lockdown many have enjoyed the rural walks around Halloughton. The proposal may protect the rights of way but a stroll through acres of solar panels is not 'what the doctor ordered'. This amenity will be lost for 40 years and incidentally the prohibition of development and restitution to nature post solar farm must be legally cast-iron guaranteed.

Other arguments will be raised, such as why not on a brownfield site instead of farmland? Why not on roofs. What are we doing about the ever-worsening problem of light pollution which escalates year on year? To spoil countryside to feed the waste of energy will breed alienation.

In summary, firm plans with endorsement from independent experts in flood attenuation and in biodiversity enhancement are essential pre-requisites. Environmental impact is the key issue here. Open and inclusive dialogue with those most affected should seek those solutions which are most beneficial to all parties. Thank you for reading this far.

- 21 Will the existing public footpaths be retained? Will any be diverted? Will the development encourage visiting (at agreed times) by school groups of all ages to allow them to see the development and explore the environmental and economic implications of the project? Will the development encourage visiting(at agreed times) by local residents to allow them to see the development, in construction and post completion, to allow them to look at all the implications of the project. Will any existing trees on the site be felled? If so where? Will there be compensatory tree planting?
- We have received the information on the Public Consultation with regard to the Halloughton Solar Farm. I am 22 unable to access the website to view the information so would you either be able to send me the correct link please or e mail the details through to me.



I apologise for writing to you twice in the same day, but I do not think you will mind. The issue facing Halloughton is a very large one.

I have two further questions, one very precise and the other raising a question of general principle.

The precise question is a request for clarification only. It relates once more to the issue of access to the site. The website states that access 'will be taken from a field gateway at the eastern end of Halloughton'. It is not explained whether this gateway is existing or is to be created. The only existing field gateway lies immediately adjacent to the grade II listed St James's church and its graveyard. The plan however shows an access point further to the east, where there is no gateway. Could you please make clear what is actually meant?

The question of general principle is of wider interest to all parties concerned. I know that I am not alone in thinking that the entire consultation process would be better deferred until the present national emergency is resolved, and full democratic procedure can be observed. The website itself states that it was a difficult decision to substitute for this a website based forum, with an end date and time of 5 p.m. on the 15th May. In my first email to you of 23rd April I asked what the necessity or rationale for such time constraints was or might be, and secondly whether consideration had been given to postponing the project until full and open public consultation could take place in the normal way. Your reply to me of 1 May does not address this point. It remains no less essential given the very large scale and consequent impact of the proposal to know why the process of preapplication and presumably application has to be pursued now. The urgency is not apparent.

As things stand, the path of a website based forum has been chosen. At the very least, as I am sure you will agree, this must be the equivalent of the public meetings that would otherwise have been arranged. In that context all questions and responses would have been in the public realm, and minuted. My experience of the website so far is the opposite. There appears to be no system for acknowledging comments or questions posted, nor for members of the public to know what comments have been made or concerns expressed, nor what answers have been given. I think everyone would be interested in this information being supplied, as it is integral to the process of local democracy.

I look forward to reading your specific response to these concerns. Because the issues involved are of public interest, I am copying into this letter each of our local elected representatives together with the Planning Secretary of the Southwell Civic Society.

- Incredible! I find it extraordinary that the owner/s of the proposed site should even consider blighting the proposed area with a sea of metal over a piece of natural English countryside no doubt for financial gain. Halloughton is a charming conservation village and the proposal shows total disregard for it's inhabitants, country values and local people who use the footpaths. In my opinion, this proposal should be abolished.
- 25 Southwell Town Council (STC) supports the proposals in principle but has several concerns:-

1 Rainwater Run-off

Westhorpe Dumble, later Potwell Dyke, is the source of regular flooding in the Easthorpe area of Southwell and caused significant flooding in Halloughton Road, Nottingham Road and Easthorpe area in the 2013 event. When making the planning application you will need to demonstrate that there will be no increase in the rate of runoff, or the application will be strongly opposed. Any reduction in the overall rate of run-off will of course be supported.

2 Visual impact

STC are concerned about the look and potential feeling of urbanisation caused by the fencing, particularly where it intercects and runs adjacent to Public Right of Way footpaths and meets the Site of Interest – and would wish to see details of what is proposed in these spots. We would prefer for the hedges to be retained and any news divisions to the hedges or wooden fencing We would also like to see more detail of the access at the field gateway at the eastern end of Halloughton and proposted signage/signposting.

3 Construction Access

Although in a different Parish, we would be concerned about the effect of Construction Traffic on the residents of Halloughton, should it go through the village. It is not clear from where the site will be accessed. We would also like to see more detail of the access at the field gateway at the eastern end of Halloughton and proposed signage/signposting

4 Noise

Some of the equipment is fairly close to Halloughton. Please demonstrate that it will not be heard from residential areas. Local measurements reveal ambient noise levels to be 20dB on a still day

5 Light pollution

What are the plans for lighting in this development? Please demonstrate that this will not be detrimental.

6 Biodiversity Enhancement Area marked on plan What are the plans for this area?



Ref	Comments Would it be possible to set up a meeting with members of Southwell Town Council Planning Committee to discuss
	the proposal in detail
26	I appreciate the need for solar farms - in the right environment. This proposed site impinges on a charming conservation village and is very close to the important Minster town of Southwell. A 'sea' of solar panels on the edge of Halloughton is preposterous - as Prince Charles once said 'a carbuncle'. This proposal should be squashed for the sake of the English countryside, wildlife and peace.
27	Thank you for this - it is helpful to have this further information, although I remain concerned (as do others) about the proposed access at the eastern end of the village in terms of its negative impact on the Conservation Area and on the grade II listed St James's Church especially.
	However, you do not reply to the question I put to you about the nature and timing of the consultation exercise, i.e. why it was felt necessary to press ahead now, when as JBM Solar themselves concede it is not possible to organise the full public scrutiny that they would have wished; and secondly - but crucially - whether the comments made and the responses given both via the website and other means will be put in the public domain. I'd be grateful if you could respond to these two points, not least because I know they concern others also.
28	We are two residents of Halloughton village and are responding to the public consultation on Halloughton Solar Farm.
	Although we understand that it if difficult to hold a meeting at the current time we would welcome the opportunity to attend such a event and suggest that the proposals are delayed until this can take place.
	Firstly can we say that we are in favour of green energy and are extremely concerned about climate change so we therefore absolutely see the requirement for renewable energy sources. However in the case of Halloughton Solar Farm we are shocked by its scale which cannot be described as anything other then industrial. We walk the local footpaths and country lanes on a regular basis and the addition of this solar farm will have a significant impact on us.
	We have a number of specific issues which we would like to be taken into account. The entrance to Halloughton village must be maintained as an attractive and rural way into this small village, therefore at the solar farm entry point adjacent to the road the gate into the solar farm must be a traditional wooden farm gate. This will fit into the current scene and other gates in close proximity. Any additional larger (potentially metal) security gate needs to be positioned well beyond this and shielded out of sight.
	It is not possible to see from the website what form the security fencing will take. We are aware of the type of security fencing around the solar arrays at Gedling Country Park and if the ones around Halloughton are to be similar it is important that when walking the local footpaths there is no view of these as this would be akin to walking alongside a prison or young offenders institute. Totally inappropriate in such a rural setting. Any fencing of this type, if it is to be installed, must be mitigated by screening with trees/hedges.
	In order to mitigate the interruption to the view and improve the landscape view in both winter and summer, evergreen trees should be planted in areas where currently there are predominantly deciduous. For example evergreens should be planted within the belt of trees alongside Stubbins Lane.
	We are unimpressed with the Year 10 photo on viewpoint 12. The hedges to the South and South-West are still low and allow a clear view of the arrays in what is an open and attractive landscape view. This hedge should be allowed to grow higher or a new hedge/trees planted to ensure the arrays are no longer visible from this viewpoint.
	Major efforts should be made to show how wildlife can be enhanced by the building of this farm.
	A finally point to be considered in mitigation of the solar farm. Halloughton is a village running entirely on oil and consideration could be made to offer financial assistance to homes in the village to switch from the least environmentally friendly energy source to new sources of heating to comply with future requirements. I would ask that you take these points into account when putting together the planning application submission.
29	A large part of this proposal drains to Westhorpe Dumble and eventually to Potwell Dyke which has caused serious flooding in Southwell in 2007 and 2013. I have no major objections to the proposals provided the runoff and peak discharge to this system is not increased and preferably reduced to avoid increasing the risk of flooding downstream. Hundreds of properties are at risk downstream.
30	Hi I am a resident of Halloughton but I am actually writing on behalf of my parents whose property will be closest to the proposal, [redacted personal details] I am also the clerk to the Halloughton village meeting and would like to be more informed when asked about the proposal. Would it be possible to confirm with onsite markers, the finished height of a panel plus to show how far down the airfield the panels come? We realise that the boundaries will be planted with hedges as screening, could you confirm the age of the plants that will form these screens? Are the panels the same size and finish as the ones at Egmanton and Eakring? Will the minimum height of the hedges be conditioned in perpetuity? What are the bases that the panels sit on constructed from? Is it possible to manage the grass around the farm in a sustainable manner instead of cutting using machinery? Thanks [redacted personal details]
31	We wish to contribute to your consultation exercise regarding the above-proposed solar farm. Any comments we make at this stage should not be taken as objection to or support for the project.



Whereas we understand why you are unable to hold a public meeting or exhibition at this time it would not seem so urgent and critical a matter that the consultation needs to be undertaken on-line. Indeed it is the experience of our members both as consultees and designers of major infrastructure schemes that face to face contact with the general public can quickly answer any questions and reassure any concerns they may have. In an informal basis local knowledge can be invaluable and in the long term secure an earlier completion.

The Civic Society are concerned that the chosen access point is alongside the Grade 2 listed church. Given the extent of the proposed development then it would seem possible to find a less sensitive site given the large amount of construction traffic that will be involved. Disruption to the Halloughton community whilst the site is being developed is a serious issue.

With regard to flooding this is also a major issue. The site may very well be in Zone 1, however the site feeds the Westhorpe Dumble. In 2007 and 2013 we had major flooding in Southwell both events causing extensive damage hundreds of properties. The Westhorpe Dumble catchment is small; your proposal covers a significant proportion of the upper part of this. The run off is very rapid and the time of concentration short causing flash flooding. In July 2013 where the Dumble meets Nottingham Road the water level rose from three or four inches to over eight feet in one hour. Nottingham Trent University at the nearby Brackenhurst Campus have a PhD Project studying natural attenuation measures on the surrounding dumbles such as building log dams etc. We would expect any scheme to provide not only sufficient retention to ensure no more water was discharged than at the present time but to seize the opportunity to significantly reduce the flash flooding lower down the watercourse.

The other main concerns about the site are the impact it would have on the landscape, the public enjoyment of the countryside around the site and the ecology of the area especially the effect on the Westhorpe Dumble. The Newark and Sherwood District Council Landscape Appraisal for the Halloughton Village Farmlands identified the following objectives for the landscape and built features-

Newark and Sherwood Landscape Character Assessment
Mid-Nottinghamshire Farmlands

ACTIONS - Conserve and Reinforce

Landscape Features

- Conserve and reinforce hedgerows where these are gappy and in poor condition, particularly internal hedgerows. Seek opportunities to
 restore the historic field pattern/boundaries where these have been lost and introduce more hedgerow trees. Reinforce with new planting to
 replace post and wire fencing.
- Conserve and Reinforce the ecological diversity of Norwood Park and other designated SINCs where appropriate.

Built Features

- Conserve the local built vernacular and reinforce this in new development.
- Conserve and reinforce the rural character of the Policy Zone by concentrating new development around existing settlements of Southwell and Halloughton.

It is important that any planning application for the solar farm takes these objectives (actions) into account. All ancient field boundary hedges, particularly those that are covered by the Hedgerow Regulations, would need to be retained and maintained in good condition by a formal agreement with the district council.

Existing hedgerows, on the boundaries to the site should, by formal agreement with the district council, be retained in good condition and at a height to screen and break up the visual impact of the development on the landscape and to mitigate the effects of the boundary fencing. Where no hedges exist to screen the fences new ones would need to be planted. This would help to retain the ethos of a rural landscape rather than that of having an industrial imposition upon it. Any buildings on the site would need to blend in with or compliment the local vernacular.

The proposal for the solar farm includes consideration for the ecology of the site and the surrounding countryside. This should include a full flora and fauna assessment of the site and the surrounding habitats; the methodology for which should be agreed with the Nottinghamshire County Council Senior Conservation Officer.

This site would offer an opportunity to monitor the effects of a solar farm on ecology. A pre site development appraisal would therefore be essential and post development appraisals over time would also need be agreed with the Senior Conservation Officer. It is helpful that the proposal for the management of the solar farm includes a grazing and cutting regime which should be agreed with the Senior Conservation Officer, as should the seeds mixtures used for planting up any areas within the site. These management issues should be formally proposed as conditions to be agreed with the District Council in any planning application. It would be essential also that the commitment to return the site to agricultural land when it is no longer required as a solar farm



Ref	Comments
	"Whilst this project may provide benefits to the wider community in more sustainable energy and financial gain
	to the land owner and developer it is difficult to see any direct benefits to Halloughton village or its
	inhabitants. These need to be clearly identified for any objective judgements to be made on the proposal."
22	Thank you for your email, but it doesn't address the issue I raised on my email of 27th April.
32	I nank you for your email, but it doesn't address the issue I raised on my email of 27th April.
	I asked for a clearer picture of the site proposal as the one on your website is unreadable.
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	I feel very disappointed that it took 2 weeks for you to reply and then to not have that issue addressed.
	Their terry disappointed disactic cook 2 meets for you to repry disactic for her later state disactic data.
	Given the consultation period closes on 15th May, this suggests that as a company you are not giving people the
	information they need to respond in an informed way to the proposal.
	I think that is unprofessional and unacceptable.
	Please send me the information I requested within the next 24 hours so I make an informed response before
	15th May.
	I look forward to hopping from you
33	I look forward to hearing from you. the file name with the FAQs will not endear you to the residents of Hullaughton/ Halloughton! You need to take
33	care not to mis-spell the name of the village. Regarding the FAQs the impression comes over as routine box
	ticking. I think you should look at each issue and ask yourself where we can go the extra mile. How can we
	encourage greater species diversity for example with some examples. It all looks too lazy.
34	Thank you for this, but please address the specific issues I raised advising that it was wholly inappropriate to
	peruse this matter during lockdown as it is not practicable to hold actual meetings to discuss the issues involved
	where video conferencing etc is not suitable for many of the residents of Halloughton.
35	Thank you for the invitation to comment on your proposals.
	I live in Westhorpe and the Solar Farm will cover the majority of a circular walk which I enjoy but that is not the
	main reason for my objection.
	I have no problem with the Solar Farm but I am against taking up farm land which should be used for crops and dairy production. Agricultural land lost will not be replaced and the produce lost would need to be imported,
	adding to the carbon footprint.
	There are more suitable sites around Nottinghamshire, that are unsuitable for agriculture, such as former coal
	mine slag heaps. The only criteria for using this land would appear to be that the owner is prepared to sell it.
36	This application is a disgrace at the current moment - attempting to pass through applications without the ability
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Ref	Comments I look forward to hearing from you. I will copy this feedback to the other email address so it is included in the
39	feedback. Having viewed the proposal and someone that lives in Westhorpe I am very happy with the layout and size of the project and as long as the land remains available to be grazed and is well managed then I think it will be more than happy to have this on my door step.
40	Please can you provide details of how we may access the environmental impact statement for this proposed project.
	Your reference to the study of the flood risk is, at best, non definitive and makes no reference to your discussions, if any, with other interested parties.
	These include The Southwell Flood Forum and the Town/District/County Councils which have invested considerable time and money in studies and projects to safeguard the area from the results of rainfall in the upstream catchment areas of the local watercourses.
	You need to provide quantitive data which is hopefully contained in your environmental impact statement and include reference to the acceptance of the conclusions in it by the above bodies before seeking a positive response from your consultation process.
41	Green Southwell initial response to the proposals for Halloughton Solar Farm Background Comments have been invited on the proposal to develop a solar farm in Halloughton capable of generating 50MW, covering 107 acres. This will generate enough renewable power to generate the equivalent annual energy needs of around 12,209 homes and will not require subsidies as the costs of solar PV have fallen 90% since 2009.
	Full details are available here , and comments should be submitted by 5pm on Sunday 24th May 2020.
	Newark and Sherwood District Council and Southwell Town Council have both declared a Climate Emergency, and recognise the urgent need to decarbonise our society. To deliver this we need to reduce demand significantly and switch remaining energy supplies to renewable sources.
	The following sections cover issues raised by members of Green Southwell, a local group of citizens concerned about the health of our planet. We are currently seeking charitable status in order to support the sustainable development of the town and its surroundings. We value our green and pleasant landscape but we also recognise the urgency of switching to decarbonised energy sources if we are to retain the climate that allows it to flourish.
	Our recommendations: 1. Include natural flood risk management measures, in consultation with the Trent Rivers Trust, Nottinghamshire County Council, National Flood Forum and Southwell Flood Forum. into the development of the land to mitigate current and future flood risk to Southwell. 2. An independent assessment of the agricultural grade of the land. 3. Newark and Sherwood District Council (NSDC) to develop the potential for renewable energy generation
	 an brownfield sites. 4. The growth of natural screening to protect visual amenity and the retention and enhancement of wildlife corridors alongside rights of way and along other existing hedgelines.
	5. This should join other local renewable energy developments by actively supporting the sustainable development of local communities by donating a proportion of revenue to local initiatives that reduce energy demand, enhance biodiversity and build community resilience.
	Flooding Southwell has been significantly impacted by surface flooding, most significantly when Potwell Dyke burst its banks in July 2013 after two months-worth of rain fell in the town in just 30 minutes. Road closures continue to follow significant rainfall, and such heavy rain is expected to happen with more power and frequency as the climate changes. It is noted on the proposal that the entire Solar Farm's site is situated with Flood Zone 1, the area at least risk of flooding. The concern is not whether the site is at risk of flooding but the effect that it could have on the catchment area that channels rainfall towards the town. Southwell sits in a bowl, and surface water run-off from the site of this proposed solar farm flows directly into Westborne dumble and Potwell Dyke. Some

Southwell has been significantly impacted by surface flooding, most significantly when Potwell Dyke burst its banks in July 2013 after two months-worth of rain fell in the town in just 30 minutes. Road closures continue to follow significant rainfall, and such heavy rain is expected to happen with more power and frequency as the climate changes. It is noted on the proposal that the entire Solar Farm's site is situated with Flood Zone 1, the area at least risk of flooding. The concern is not whether the site is at risk of flooding but the effect that it could have on the catchment area that channels rainfall towards the town. Southwell sits in a bowl, and surface water run-off from the site of this proposed solar farm flows directly into Westhorpe dumble and Potwell Dyke. Some flood mitigation measures are planned for the town, following a detailed study by Nottinghamshire County Council, the lead flood authority. In addition, natural flood risk management measures have been installed in the catchment area around the town including leaky barriers, earth bunds as well as online and offline storage ponds. These temporarily attenuate water during high flow events and were shown to work effectively and help with flattening the peak flow during the heavy rains in October and November last year and February of this year. However, flooding still occurred, resulting in the closure of Nottingham Road at times and the climate science predicts that rainfall could continue to become heavier at times. We therefore ask that natural flood risk management measures are incorporated into the landscaping of the site, in consultation with the Trent Rivers Trust, Nottinghamshire County Council, National Flood Forum and Southwell Flood Forum.

Land use

Members support the development of renewable energy systems, but there is a general preference for use of rooftops and brownfield sites for solar PV. Some stated a preference for wind turbines which have a minimal footprint on greenfield sites. The entire site has been assessed as Grade 4 agricultural land which does not form



Best and Most Versatile Land. According to gov.uk this land is "mainly suited to grass with occasional arable crops (for example cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties using the land. The grade also includes arable land that is very dry because of drought." However, we have seen claims that this is Grade 1 farmland, which would have a very different and detrimental impact on the ability to maintain a sustainable local food supply. Gov.uk describes Grade 1 land as "Land with no or very minor limitations. A very wide range of agricultural and horticultural crops can be grown and commonly includes top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality." This development will cover a significant area of farmland (this is not defined in the proposal), which currently appears to be used for arable crops, and the developer says that the land will be used for grazing sheep to maintain the grassland underneath the solar panels. We understand that grassland beneath solar PV can provide a useful natural habitat as it is not subject to intensive farming. Soil health could improve and grass may grow longer with deeper roots, this improves soil structure and water absorption reducing the speed of runoff water. We would like this considered when planning grassland maintenance by sheep.

In summary, there is a tension here between the need to build sustainable local food supply chains and the need to develop supplies of renewable energy. The big picture requires us, as a society, to rapidly rethink and reduce our energy demand, and there is the potential for nature to thrive alongside renewable energy systems, but for this project our concern is the different assessments of the agricultural quality of the land. We would therefore like to understand the independence of the assessor who graded the land, and whether this is checked by the planning officers.

We would like NSDC to develop a plan for the use of brownfield sites that provide an opportunity for communityowned solar PV farms, and to promote the installation of solar PV on rooftops, to minimise the impact of solar PV on the green environment.

Community Benefit

The proposal notes that the Public Rights of Way which pass through the site will be retained and unaffected by the proposals. As this is a development on a greenfield site we would like to see plans for the growth of natural screening to protect visual amenity and the retention and enhancement of wildlife corridors alongside rights of way and along other existing hedgelines.

Finally, development of renewable energy will only deliver Net Zero if the UK concurrently reduces demand. Other renewable energy developments in the area have provided a percentage of their revenue to support social and environmental projects in their local host communities. In the development of the Hockerton wind turbine this was seen as a thank you to the village for acting as hosts for the development, and the fund was defined in order to further the environmental benefit of the development. We therefore ask the developer and NSDC how this and other commercial renewable energy developments will support demand reduction and affordable energy for local households and small businesses.

- Firstly I believe that the consultation period for this development should be extended until such a time as when a public meeting can be held so a question and answer session can be held in an open forum. I have questions that I would like answering, please.
 - 1. How long is the proposed lease on the land?
 - 2. What are the decommissioning plans should the project go ahead? Will the land be returned to it's former use? What provision is proposed to ensure this expensive process can be acheived?
 - Which JBM Solar company is proposing to construct this development? eg. JBM Solar Projects 1 Ltd or JBM Solar Projects 27 Ltd etc.
 - 4. The Ballymacarney Solar Farm covers an area of 200 acres and is projected to provide enough power for 13,000 homes. The proposed Halloughton Solar Farm has an area of 265 acres but is only projected to provide enough power for 12,000 homes. So 65 acres more producing less electricity why is that?
 - 5. Where do you propose to site the sub station required?
 - 6. Who will be managing the site? Will it be another incarnation of JBM Solar or another provider? Do you work with recognised companies who specialise in running these sites or do you opt for the highest bidder?
 - 7. Have you taken the local flooding issues in to account? I have read a Solar White Paper from a firm of solicitors that specialise in assisting land owners get planning permission for their developments and one of their points is 'Adequate site drainage to prevent flooding and ensure water is discharged away from site'. If water is discharged away from site that will put local housing in the path of any water. Have you considered this?

I look foward to receiving answers to these questions in order that I am able to make an informed decision should this proposal reach the local planning stage.

- 43 1. Why is the site so large? It is very close to Southwell and is in the region of 2/3 the size of the town!
 - 2. Why does the proposed development include a discreet area of woodland to the west of the main site? Must this woodland be sacrificed, and to what purpose?
 - 3. You say the land will be returned to 'full agricultural use' following decommissioning. What is the duration of this project? Is it 5 years, 50 years, or even longer?



I am concerned that this consultation is taking place during lockdown without the possibility of a village meeting in Halloughton.

A number of residents of the village are very elderly and do not have a computer or access to the internet. This means they are effectively excluded from this consultation. My elderly parents are in this position so I will have to submit a dictated email on their behalf.

One of the key documents on your website is not big enough to read and understand as the text is so small. **[redacted personal details]** kindly emailed me a larger version, but as I explained to her it was still too small to read. When I tried to enlarge it, the text just blurred so was still unreadable. I haven't heard anything further from **[redacted personal details]**.

I think having key documents that are unreadable makes a mockery of the consultation.

I cannot see any reason why this consultation has to be rushed through rather than waiting until lockdown is lifted and a village meeting is possible.

Please can you explain why this cannot wait until after lockdown is lifted.

I understand that solar energy is the way forward and we have had some solar panels in fields near the village for some time. They are discreet and not visible from properties in the village.

However this proposal is for a huge solar farm extending right over to the Oxton Road near New Radley Farm. It begins in fields just behind the village lane and will be visible from a number of houses including where I live.

Please could the site be reduced to ensure that the current green field views from properties in the village are kept.

Please can you explain what will happen to the land once the solar farm is decommissioned. My understanding is that the current 'green' field area will become a 'brown' field area after decommissioning. Is that right?

If that is right then there are significant implications for how such a huge brown field area could be used afterwards. Is it possible that the area could then be used for housing development?

If some kind of solar farm goes ahead I don't think it should be called Halloughton Solar Farm. That suggests it is something the village has requested and wanted.

Please can you acknowledge receipt of this email.

I look forward to hearing from you.

We have been residents of this conservation village for 52 years and we are alarmed by the proposals put forward by Pegasus.

Halloughton is entirely dairy farming and agriculture and one small unobtrusive area of solar panels. We feel that the massive proposition that you have put forward would be grossly intrusive and would no doubt eventually leave land being available for industrial or property development.

While solar energy is no doubt the way forward, the appropriate sighting of solar farms is the key.

We do not consider this proposal appropriate sighting for this small rural conservation area and we object to the suggested name of Halloughton Solar Farm.

Please acknowledge receipt of our feedback.

46 Has any assessment of the effects on local wildlife been carried out?

On behalf of [redacted personal details], I should like to confirm that we wish to contribute to your consultation exercise regarding the above-proposed solar farm.

We appreciate the problems of holding a public meeting or exhibition at this difficult time but hope that it will be possible before your proposals are finalised.

The proposed site contains several features of potential archaeological significance and it is vital that a full archaeological survey is carried out in conjunction with the County Archaeologist. Details of this should be agreed with the District Council as a condition to be attached to any planning application. [redacted personal details] are concerned about possible damage to heritage assets at the proposed access alongside the Grade 2 listed church.

Further away from the village, the attached Lidar scan shows evidence of archaeological features, particularly in the fields near New Radley, that should be investigated and any mitigation measures agreed. This is a historic landscape and it is important that historic field pattern boundaries are retained and restored where lost.



Ref	Comments			
	Finally, we would welcome the opportunity to meet on site to discuss our concerns as soon as circumstances allow.			
48	I note the contents of your latest leaflet advising that you are "extending the consultation period until the 24th May" (a somewhat negligible extension ?!!?)			
	It would appear that you are choosing to ignore the numerous requests of the villagers (including myselfsee my recent email below to you) to delay the whole matter until lockdown is finally over when ALL the residents of Halloughton, particularly the elderly who are not familiar with "video conferencing" etc will be able to exercise their democratic right in a fair and proper manner.			
	Why the rush ??			
	I certainly hope that the planning officers at Newark and Sherwood DC (Whom I have copied in again on this email) see through your rather blatant attempts to circumvent democracy by rushing this through when all of the relevant parties are unable to exercise their democratic right during these difficult times to discuss this matter face to face.			
49	Firstly, we feel that the public consultation should be delayed until such a time when a public meeting can be held with interested parties able to attend in person.			
	We are very much in favour of sustainable energy initiatives but we feel that although this is a laudable initiative, it is in the wrong location. We have strong reservations about the siting of such a large acreage of panels on agricultural land situated between two conservation areas.			
	We question:			
	 whether a development of this size so close to the boundaries of Halloughton would not undermine the validity of the village as a complete conservation area, set in its appropriate context. For example, looking past the village church and agricultural buildings, both current and former, to an extensive acreage of industrial units creates an uncomfortable juxtaposition. 			
	 whether this is an appropriate development in an area where so many of the residents of Southwell and Halloughton, and visitors to the area, love to walk the footpaths and appreciate the countryside. The panels will greatly detract from the attractiveness of the area in question. whether, should the planning application be successful, the plan to erect stock fencing is a good one. 			
	We understand the intent, but if any boundary is needed it should be a hedge of appropriate local species.			
	 whether the possibility of using brown field sites for this development has been sufficiently explored. whether this is an appropriate use of agricultural land. whether, if this proposal were to be accepted, it would not set a planning precedent for future applications near conservation areas. 			
50	This is an excellent proposal which has my full support. The recent lockdown has demonstrated how air quality has improved in a short period when we stop burning fossil fuels. We owe it to our children to start the journey now to a cleaner and more sustainable world. You have my best wishes in your applications for the necessary			
51	approvals. Halloughton Solar farm response to public consultation documents from [redacted personal details]. 21/05/2020			
	Trailoughton Solar furni response to public consultation abcuments from [reducted personal actuals]. 21/05/2020			
	On the 7th of May you wrote "We typically approach landowners once we have identified grid capacity within an area". Perhaps you could confirm that is is actually the case here as it seems strangely coincidental that this is the third recent attempt by the landowners in question to develop its farming assets in Halloughton.			
	The Solar Farm Association talks of solar parks being generally one to 100 acres in size. At 107 hectares (=264 acres), the size of this solar park is excessive and inappropriate to the landscape of fields, woods paddocks and orchards of the rolling farmland typical of this area of Nottinghamshire. The Westhorpe Dumble and the landscape setting of the Halloughton village conservation area will be completely swamped by this sea of glass surrounded by security fencing.			
	Terrain			
	Your photos make the land appear flat but this is far from being the case. From the top of the fields destined for panels to the east of Halloughton Wood there are views over to Belvoir castle and a panorama of the Vale of Belvoir. The parts of the solar park running up the hill to the top of the ridge above the village will clearly be visible for many miles around not least from the road that runs through Halloughton village and some of the village homes. This ridge rises to just under 300 feet which makes it the highest point for miles to both the west and south of Southwell.			
	You talk about hedging but where the land rises as it does on both sides to this ridge hedges will do little or nothing to screen the panels and fencing. A walk up the village from the church towards Halloughton wood makes this all too clear.			



Solar farms on flat and poor agricultural land may be acceptable but ones that dominate the landscape for miles around are not. Hedges are inadequate screening where the land rises as it does here. There are immature deciduous trees trees at the A612 end of the development which during the winter months will not screen the panels behind.

Rights of way

From the ridge footpath that runs from the top of Halloughton wood to Brackenhurst are views of Southwell Minster, the landscape towards Bilsthorpe and the landscape over beyond Newark to the Lincoln ridge. This is a path well used by riders and pedestrians doing the circuit via Stubbins Farm or linking with the Robin Hood way which takes the path further along the ridge past Brackenhurst. In the fields near Halloughton wood footpath users will be surrounded by solar panels secured behind ugly 6 foot fencing.

Wildlife

A walk through Halloughton currently rewards you with sightings of more than 60 varieties of wild flowers and many birds including pheasants, partridge, larks, swallows, buzzards and recently red kites. Deer can also be spotted, in particular in the area of Halloughton wood.

I am concerned about the effect of 6 foot fencing on the movement of deer, the impact on the swallows which feed at low levels in the fields and the larks which are ground nesting and don't adapt well to fields covered with panels.

Access

The leaflet produced by the solar park talks about access from the A 612 but the actual access is from the top end of the single track road that runs through the village and is in very close proximity to the listed church and the adjacent manor house which incorporates a medieval stone tower. The access is within the conservation area. There is currently neither a field gate or gap in the hedge as stated in the leaflet and earlier particulars.

Security

The security of solar parks is an increasing problem as a recent reports from Lincolnshire and elsewhere demonstrate. There is easy access to the site from both the Oxton road and up the byway to the side of Halloughton wood. The fencing pictured would not deter thieves as many local farmers would testify. I am concerned that having got planning permission the developers will seek to install heavier duty fencing and/or lighting.

Flooding

The village road currently floods on a regular basis and the access is at a point which flooded in 2013 cutting the village off completely.

Conclusion

My main concern is the sheer scale of this solar park and the impact it will have on the landscape setting of our beautiful rural conservation village and Westhorpe Dumble together with the impact on the wider landscape towards the Vale of Belvoir.

I suggest the scheme be scaled down, in particular on the Halloughton side of the ridge to avoid the impact on Halloughton village and the landscape towards the Vale of Belvoir. The access should be removed from the conservation area to a more suitable location where it will not impact on listed buildings.

Southwell Flood Forum was set up following a huge flood event in July 2013 when well over 150 houses were severely damaged and many families were out of their houses for up to a year while their houses were dried out and repaired.

We endorse the comments made by Green Southwell below (to which we have contributed) and would like to add that other significant flood events have happened over the years, with increased severity and frequency.

A previous flood in 2007 which damaged over 50 houses was a 1:100 year event, so apart from a flood study by Nottinghamshire County Council, residents were led to understand this was a rare event.

In 2013 Nottingham Trent University obtained funding for a research project on "Flooding in Southwell" which included the installation and evaluation of Natural Flood Management measures on their land around the Brackenhurst campus (south of Southwell) by the PhD student [redacted personal details]

redacted personal details was subsequently appointed as the Project Officer for Trent Rivers Trust in the INTERREG European-funded FRAMES project to reduce flood risk by natural flood management.



Ref	Comments		
	TRT installed measures – bunds, leaky barriers, scrapes etc – in the upper catchment area of Southwell and have shown benefit during the winter storms of 2019/20.		
	However, residents are constantly alert when heavy rains are forecast and many 'near-misses' including the most recent over the winter of 2019/20 drive our efforts to continue to seek as many opportunities as possible to mitigate the effect of heavy rainfall.		
		f your organisation on 2	uthwell Flood Forum's lead on watercourses) are meeting redacted personal 21st May. We appreciate this opportunity to discuss how all interests can be best
53	Please find attached a statement on behalf of [redacted personal details] for your consultation process together with 3 plans of land he owns and over which he has the sporting rights. I will send to you separately a copy of some correspondence at the time of the sale of Thorney Abbey Farm. I am seeking further information from my clients solicitor. Because that firm has its office closed it is taking more time than usual to get all the deeds together.		
	Represen personal		cted personal details], Chartered Surveyors as agents on behalf of [redacted
	1.	<u>Background</u>	[redacted personal details] owns and farms the land edged red on the attached plan extending to approx. 625 acres.
			He lives in [redacted personal details] which is marked on the plan.
			The proposed solar farm borders his land on the south and west sides of his farm and therefore has a significant potential impact on it and in the enjoyment and use of his farm.
	2.	Sporting Rights	redacted personal details used to own the adjoining Thorney Abbey Farm which was sold. The shooting rights were however retained by redacted personal details. Part of the land over which the proposed solar farm is located is land over which redacted personal details owns the sporting rights. A plan of Thorney Abbey Farm is attached. He would like the ability to be able to continue to use them. The shooting rights on other land which was formerly part of Thorney Abbey Farm which do not form part of the solar farm are affected significantly by the solar farm proposal.
	3.	Shooting	[redacted personal details] lets the sporting rights on the remainder of his land to a local shooting syndicate. The syndicate and [redacted personal details] are both concerned that the location of the solar farm will have considerable impact on their ability to shoot. This will probably result in a significant reduction in the rental value of the shooting rights and of the income [redacted personal details] would receive in future.
	4.	Loss of Visual Amenity	The solar farm if developed will have a profound effect on the views from [redacted personal details] land to the south and west. The basic planting identified on the drawings of the scheme sent to us does nothing to address and rectify this problem. This will particularly the case in winter when there are no leaves on the trees and hedges.
	5.	Proximity to Stubbins Farm	[redacted personal details] lives at [redacted personal details] and the adjoining barn is let to tenants. The proximity of the development which is approximately 250 metres away from the farmhouse is a concern to [redacted personal details] as the house is south facing and the proposed solar farm is visible from it.
	6.	Depreciation on Capital Value	The proximity of the proposed solar farm to [redacted personal details] land and house has a detrimental effect on the capital value of his property if the development goes ahead for all the reasons set out above.
54	There is no doubt that finding non-fossil fuel ways to provide energy is an essential in order to prevent further catastrophic damage to Earth and its inhabitants - plantlife, animals and humans. But also as essential is using our land for agriculture in order to feed our populace. The current crisis has highlighted the importance of our farmers in keeping food available and this situation has shown how much we rely on local produce. Agricultural land, therefore, should be used for food production rather than the provision of green energy. Currently most of the fields in question are in cultivation or used for grazing – including some of them for cows which provide milk for one of our most prestigious cheeses.		



In any event, siting is everything, not only in practical and technical terms, but also having at the forefront of consideration the local environment, its history, its ecology, and the effect it would have on local settlements and people.

As far as the area of land proposed for this installation is concerned, it is very much in the rural and agricultural heartland of this part of Nottinghamshire. It is a landscape of ancient lanes and bridle-ways, venerable oak and ash trees, high multi-specied hedges, many with the typical S-shape reflecting early cultivation practice (both characteristics - species and shape - indicative of their great age). Should the project go ahead all trees and hedges should be retained because of their contribution to environmental health and the importance they have for wildlife. On the May days the site was walked the hedges were full of birdsong - whitethroats, willow warblers, chiff-chaffs, yellowhammers, dunnocks etc - and, in the sky, swallow and buzzard flew - it is an area rich in birdlife.

The slopes on which the panels are proposed to be sited are mostly in prominent view – for example from the lane between Halloughton Wood Farm and Halloughton village and the views down to Westhorpe Dumble.

Part of the site would come extremely close to the dwellings at the head of Halloughton village, a disruption to the peace and beauty residents currently enjoy.

As well as the solar panels themselves, which would be an industrial intrusion into these lovely and unspoiled landscapes, the proposed fencing around the panel areas would be extremely unsightly and also off-putting to the many people who walk the countryside paths in this area for the peace and beauty they currently provide.

The area of land in question has not had any comprehensive archaeological survey, however LiDAR scanning reveals a palimpsest of very significant features including a possible barrow, holloways and/or ditches. No permissions could be given or work commenced until a thorough archaeological evaluation was undertaken. Should the proposal go ahead a professional, accredited archaeologist would need to be on site during development in order to undertake a watching brief on groundworks.

In addition to the actual land on which the solar panels are proposed to be fixed, it is not clear where the entry to the site is intended to go – it should not cut through any part of this conservation village, nor through the important wildflower area fronting the A612 between the lane into Halloughton and Stubbins Lane, nor along the ancient and unspoiled Stubbins Lane itself.

In conclusion, it is hoped that this proposal will not go ahead and that land less valuable in agricultural, wildlife and historic landscape terms and more suitable for the generation of green energy will be found.

In response to the public consultation exercise which you have launched, I would like to make the following comments. Halloughton is a distinctive and attractive Conservation Area, much appreciated both by its residents and visitors. It is very obvious that this is a major proposal which if allowed will have a significant impact on the village and its landscape setting for very many years to come.

We already have a solar PV ground-mounted installation in Halloughton, in the corner of a field at Manor Farm (Planning permission granted 2011). It is small (surface area 0.25 hectares), discreet (59 stands of four solar panels set in seven rows, height no more than 1.3 metres), and hidden away on the farm property. The applicant was at pains to point out that it had no impact on the amenity of residents. All this is in the public domain (NSDC Planning ref. 11/01457/FUL).

The proposal now out for consultation could not be more different. It is:

- (1) on a huge scale (107 hectares)
- (2) it will have an equally huge visual presence (although this information is not given on your website, scaling up from the current installation, it looks as if this might well mean something in excess of 25,000 arrays of solar panels)
- (3) it will anything but hidden away, but from a variety of viewpoints visible for miles around
- (4) the impact on residents and visitors will be very marked, both during construction (especially so) and afterwards.

In the light of this, these are my thoughts. Feel free to correct what you might deem to be inaccuracies.

1. Context

The justification for the project therefore has to be weighed very carefully. What your website does not make clear, but what should be made clear to anyone or to any collective body concerned by the proposals, is that the nature of the UK solar power industry has radically altered. Government subsidies have disappeared, which for a time caused a dramatic slow down in solar farm development; but the cost of solar panels has now fallen dramatically too, opening up big investment opportunities if the scale is right. Capital costs remain high, but so are the stakes. Commercial viability (and profits) goes in proportion to the size. According to websites promoting the services of solar energy advisers, the gains are high for landowners too - £500-£1000 per annum per acre,



for the duration of the project (20, 30 or even 40 years). The Halloughton project follows the pattern of the new subsidy-free large scale solar installations.

The size of the proposal, at 107 hectares and potential generation capacity of up to 50 Mw, is in line with several others. All depends however on the suitability of the site chosen. There are significant disadvantages to the choice of the Halloughton site which the developer's website either does not address or glosses over. These are as follows. There is abundant material on the web concerning good practice for solar farm installations, and I have used this in formulating my response / comments.

2. Use of agricultural land

Ideally ground mounted large scale solar PV arrays should use previously developed land, brownfield land, contaminated land, industrial land, or if agricultural land, preferably land of classification 3b, 4 or 5.

The Halloughton Solar Farm website states that the entire site has been assessed as agricultural land grade 4. The Natural England map of agricultural land classifications for the local area on the other hand shows the entire site as classified grade 3. It does not distinguish between 3a and 3b. However, it is relevant to note that in the case of class 3a land good practice dictates that the developer's proposal should include an explanation of why this land needs to be used and not that of a lesser agricultural classification, and further to this provide information on the impact of the proposed development on the local area's supply of land in the same classification. I attach the relevant section of map below. On the plan the colour green indicates grade 3 land 'Good to moderate', and blue grade 2 ('Very good'). It will be noted that there is grade 2 land at no great distance from the northern edge of the development site.

It is clear that an independent soil assessment, with a full tabulation of the appropriate evidence, needs to be attached to any full planning application.

3. Access

At present the sole access to the 107 hectare site and its associated construction compound is via a single point at the eastern end (but still within) the Halloughton Conservation Area, and in close proximity to the grade II listed St James's Church and the grade II* listed Manor Farm with its attached medieval tower/solar.

I attach a photograph of where the developers have said the access will be, and it is immediately obvious that the construction of such an access will compromise a mature tree, a historic (1951 Festival of Britain) bench where walkers and cyclists often rest contemplating the calm of Halloughton, and also Halloughton verge itself, which is classified as a Site of Importance for Nature Conservation, and characterised as a 'herb-rich roadside verge' (2/525).

It is instantly apparent that this is not a suitable choice of location for the frequent movement of heavily laden HGVs (nor heavy plant or earth-moving machinery, which are not mentioned). The single-track entrance into Halloughton is simply not designed for this. In addition the turning into the village of such vehicles from the A612, since the junction with Halloughton is on a bend, represents a highway hazard. A Construction Traffic Management Plan, which is otherwise good practice, will not address this.

My photograph also shows that contrary to the statement made in the recently distributed FAQ leaflet from JBM Solar/Pegasus group there is no gap in the existing hedgerow from which access to the site could be taken, nor is there any existing field gateway as the developer's website appears to imply. If the access were to be created from that location, it is a moot point (but with heavy consequences) what kind of gateway that might have to be. Since this would be the only access to the site, the security implications are considerable, and the visual impact in the CA would very likely be unacceptable. The website and the FAQ sheet which has followed does not address these points. However, it is a given that they must form part of the Design and Access statement prepared for the LPA by the applicants (Dept for Communities and Local Government Circular 1 / 2006, para. 87), so one feels more might have been said about it here.

For all these reasons I hope that this aspect of the proposal can be amended

4. Landscape and Visual Assessment

Good practice will recognise that there are a number of features associated with solar farm development which affect landscape character and visual amenity. The consultation website does not mention the question of landscape character at all. The FAQ leaflet makes only indirect and vague reference to it ('Views of the development will be possible from some of the surrounding footpaths and roads. A comprehensive landscaping scheme is proposed'.)

In fact it is essential to give full weight to the question of landscape setting, including, specifically, reference to gradient of the site and surrounding landform, the extent of the site, height layout and colour of the solar panels, treatment of the ground below and between the panels, and perimeter fencing. Of these only the site extent and



(in the FAQ document alone) perimeter fencing are mentioned. While recognising that it is not possible to include everything in the consultation phase of the proposal, these gaps in the information seem regrettable. The landscape of which the 107 hectares in question form part is of known sensitivity, as in the 2012 Southwell Landscape statement, itself drawing on Natural England's regional landscape character types (Area 5b Wooded Village Farmlands). The proposed development site bears an evident correlation to this character type, with its undulating farmland, patterning of hedged fields, intermingling and proximity of woodland (some of it ancient), and the presence of the steep-sided valley of Westhorpe Dumble bisecting it.

The impact of its transformation into solar farm needs therefore to be very carefully considered. It is unfortunate that the consultation website pays so little attention to this aspect. The gradients and contours of the site will without any doubt increase its visibility. The ridge running west-east from Halloughton Wood over which the solar panels will spill to the south lies above the 85 metre contour line (height 89 metres), and has sight lines extending for many miles in a southerly direction towards the vale of Belvoir and Belvoir Castle, which is visible. On the northerly side the land is valley-shaped, with Westhorpe Dumble running through the middle. All this will be replaced by a sea of solar panels. The existing landscape, much enjoyed by those who walk or ride through it, is clearly of more than low importance. The question has to be asked whether the developers, as in terms of good practice they should have done, have fully taken into account the character, quality and value of the land to be developed. Here the issues are whether the site contributes to the area's sense of place and distinctiveness, whether its current condition is good, and whether it is

valued by people, local community and visitors. The answer in every case is yes, so on these grounds too I am surprised that the developer has chosen not to address the issues concerned.

5. PV arrays / panels

Could details be given of the height, distance from the ground, and overall dimensions of the solar panel arrays? Also of their configuration and orientation? I assume they will be fixed and not pivoting. This information is of obvious relevance to the question of landscape setting and visual amenity.

6. Security and fencing

Questions have already been raised by members of the community about this. The answer given in the FAQ leaflet is that 'a stock fence will be put up around the site'.

This in fact raises more questions than it answers. The Indicative Site Layout Plan on the consultation website clearly shows each of the component parts of the overall site being surrounded by its own security fence - 'security fence' being the term used in the legend to the map. In many cases the security fences form passageways, with one on each side. So it seems pretty obvious that there is not in fact 'a stock fence around the site', but a whole complex of fences securing the different parts of it. The loss of visual amenity over the site as a whole will be very stark.

The point has even more force for another reason. A stock fence is not a security fence. It can be broken through in minutes. PV panels are expensive, and the costs of this installation I imagine will run into many millions of pounds (Cleve Hill in Kent, much bigger - by a factor of 4 - has announced installation costs of £450m.). Solar Farms are targeted by criminal gangs. I note that one CCTV tower (height not specified) is included on the site layout plan. However, parts of this site, especially at the Halloughton Wood end and towards New Radley Farm are very isolated. I therefore have some difficulty in believing that the developers propose to put their trust in a stock fence.

Good practice advice is that perimeter security fencing should conform to SEAP (Security Equipment Approval Panel) class 1-3. The same literature suggests that any access point to the site should have a 'robust and adequate defence'. This compounds my concerns about the siting of the access point within the Halloughton Conservation Area (see para. 3 above).

Hence my question for JBM Solar is to know whether the issue of the fencing has been fully thought through. The final choice of type of security fencing has important implications for environmental impact on the surrounding landscape. The extent and complexity of the security fencing arrangements for the solar farm could in themselves have a major adverse effect on the landscape setting. As shown on the Indicative Site Layout Plan it appears to create an unfortunate kind of chequer board effect. The multiplication of barriers is in any case undesirable from the wildlife point of view. If the choice of fencing turns out to be full height SEAP approved security fencing the consequences will be serious.

7. Rights of way

Again, questions have already been raised about this by members of the community. The answer given in the FAQ leaflet is that rights of way and access to them will be maintained, but what it does not say is that views from them will be significantly changed. The right of way through the middle of the site, running in an easterly direction from Halloughton Wood, will pass through two field arrays of solar panels and be bounded on each side by security fencing. This will fundamentally alter the characteristics of the right of way in question.



It is also to be noted that on the Indicative Site Layout Plan published on the consultation website the line of the right of way is shown incorrectly, as any ground inspection will show. It is also the case (but not mentioned by the developers) that the maintenance track for the proposed solar farm crosses the right of way. Presumably this will have a significant impact during the period of construction.

8. Wildlife and biodiversity

The wildlife surveys of the site undertaken by the developers have not so far as I know been made public, so members of the community do not know what they might have discovered. However, both muntjac and roe deer have been sighted in the area. If the project does go ahead, it will be important to establish wildlife corridors through and around it for larger mammals that cannot pass through the security fencing. The reference in the FAQ leaflet to 'gates that will allow small mammals to pass through' is something else, and not in itself totally clear - does this mean some system of flaps or clearance at the bottom of the fence itself?

A full independent field survey must be commissioned in order to establish the existing biodiversity and importance for all forms of wildlife of the entirety of the site. In 2011 a desk top ecology study was commissioned for the much smaller parcel of land involved in the PV solar installation planning application of that time (see above). Its conclusions are relevant here, since the land concerned is situated only 200 m. approx. from the perimeter fence and only very little further than that from the proposed construction compound (together with a further set of separately fenced-in set of installations, not identified on the Site Layout Plan).

The 2011 report, which may be consulted via the NSDC planning applications website under the ref. 11/01547/FUL, identifies nine local wildlife sites within 2 km. of the survey area. It indicates an amphibian population of frog, common toad, palmate newt and great crested newt within 2 km. of the survey area, and in the same radius a mammal population of bat, water vole, brown hare, hedgehog and badger. It concludes however that the small scale of the development is unlikely to have any adverse effect. An obvious inference is that the proposal upon which views are now being taken, given its huge scale, might very well have precisely such an adverse effect. All this reinforces the case for a full and independent field survey of the site.

Taking the 107 hectare site as a whole, it should be noted that on the western side it is in close proximity to two further Sites of Importance for Nature Conservation. Halloughton Wood (2/532) is classified as Ancient Woodland and as of botanical note, while Cotmoor Plantation (2/723) is characterised as a damp deciduous woodland with a diverse flora. A third SINC (2/524) is Westhorpe Dumble itself, which runs through the middle of the site. It is a characteristic and unspoiled Dumble, of some historic note from a botanical point of view. The Indicative Site Layout Plan shows that under the Solar Farm proposals a length of its course will be bounded on each side by security fencing. This will clearly have an adverse effect on the natural qualities of the existing landscape.

I have another question. The Indicative Site Layout Plan on the website does not show at all one area of the development, which is nonetheless clearly bounded in red as part of the Development Site on the Site Assessment map, and clearly indicated likewise on the aerial photograph. The area lies to the west of the Cotmoor Plantation, and is separate from all the rest. What is its function, and why is it there? The website and the FAQ leaflet are both completely silent.

9. Flooding assessment

Once more, this has been the subject of questions from members of the community, unsurprisingly so since there is a known risk of flooding in the Southwell area and Westhorpe Dumble runs into the town in a known flood-prone area. Whereas the consultation website dismisses the flooding risk concern, the FAQ leaflet does respond up to a point, but only by producing a phrase that requires interpretation, viz. 'Any Runoff will be conveyed via swales and stored within an attenuation basin to achieve betterment'. This is not very convincing, not least because marshy and moist swales are prone to blockages.

The flooding risk remains therefore a very real concern for many Southwell residents, and the developers do not really seem to have taken this on board or proposed any properly effective answer. The problem seems to me in fact to be even worse than others have indicated, because while this is not mentioned by the developers the construction works for the Solar Farm are likely to involve the stripping of soil for access roads, construction compounds, cable trenching etc. This will increase runoff and exacerbate flood risk. There is no mention of how this will be dealt with.

10. Conclusion

The consultation document is marred by a number of very conspicuous errors and omissions. This does not inspire confidence in the realistic chances of this project being handled in a sensitive and appropriate manner.

The three chief areas in which the proposal appears to hit real problems are those of access, security fencing and flooding risk, but there are other concerning aspects also. The ecological impact has not been properly assessed, and the whole question of landscape setting and visual amenity needs to be explored much more thoroughly.



Please ensure that the development does not impact on the local wildlife. There are birds on the RSPB red and amber list: grey partridge lapwing turtle dove cuckoo skylark starling song thrush tree sparrow yellow hammer bull finch snipe tawny owl kestrel Also in the area: barn owl buzzard green woodpecker greater spotted woodpecker Animals including hedgehogs, badgers, foxes, grey squirrels, common newts and common frogs. Please show what has been included to protect and benefit these in the plans and also indicate how the impact will be assessed over the years that the solar farm is in situ.

Ends.

www.pegasusgroup.co.uk



Pegasus Group Pegasus House Querns Business Centre Whitworth Road Cirencester Glos GL7 1RT

Telephone: 01285 641717

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