

20/01242/FULM - Land North Of Halloughton, Southwell - Construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure

Consultation Comments in Full

Halloughton Parish Council – Object to the proposal (27 object, 13 Support, 1 Abstain)

Southwell Town Council – “Southwell Town Council considered application 20/01242/FULM Land North Of Halloughton and agreed by majority to object to this application for the following reasons:

- Overall size, The proposed site is too large at 260 acres. They prefer to see a much smaller site

- Loss of over 100 hectares of Grade 3 (according to the DEFRA maps and local evidence) agricultural land in a rolling landscape, (Govt policy to prefer flat landscapes for Solar Farms)

- Lack of an adequate archaeological report, a full report is required as this area is of archaeological interest

- Intrusive nature of the fencing and CCTV cameras, there are 138 three metre high CCTV poles around the fencing, could this height be reduced and could it be confirmed that these are infra red cameras to reduce any risk of light pollution?

- There will be loss of amenity to well used public footpaths around and through the site also the loss of views and ‘hedging-in’ of footpaths

- Loss of amenity to the people of Halloughton from both the panels and the siting of the access road within the conservation area. Many of the shielding features of Woodland and hedges are on other people’s land and the removal of any of these would have a dramatic visual impact on the area and is out of the developer’s control

- Inadequate flood mitigation measures especially in the Halloughton catchment. Also there seems to be no account taken of the probable silting of the attenuation ponds.

- Height of the panel arrays

- It goes against Southwell Neighbourhood Plan in E4, E5 and in particular policy E6 which states: it should not ‘impact negatively on the local landscape character’ There will be loss of amenity to well used public footpaths around and through the site. The area around Westhorpe Dumble will be significantly impacted and there will be significant loss of established wildlife corridors.”

Comments on Amended Plans: “Southwell Town Council considered application 20/01242/FULM Land North Of Halloughton and agreed by majority to strongly object to this application for the following reasons: -

There are no substantive changes to the previous application and this development is using prime 3B agricultural land. Such developments should be reserved for brownfield sites.

The council reiterate their previous comments [...].”

Halam Parish Council – “Halam PC do not support the above application 1 for 4 against [for the following reasons]: covers a too large area, a scar on the landscape, the run off rain will add to flooding problems, the PC are for green energy but not on this scale here”

Comments on Amended Plans: Halam PC do not support the application 5 against 1 for 1 abstention

Southwell Civic Society – “Whilst few people would argue with the need for green energy, we strongly object to this particular application for the following reasons:

Site Selection

The applicant has failed to adequately show that its search for this site was rational.

There should be a full evaluation of and comparison with alternative sites in the District.

Sites for housing development were selected following a robust methodology as detailed in the Allocations and Development DPD and we should expect no less for solar farms. This is not an outline application but a full planning application for a major development on 107 hectares of unspoilt, elevated, undulating countryside which does not meet the Solar Industry’s own criteria for the selection of sites which are that ‘Ground Mounted Solar PV projects over 50kWp, should ideally utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b,4 and 5. Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly flat, well screened by hedges, tree lines, etc. and not cause undue impact to nearby domestic properties or roads’.

At 49.99MW, this proposal is a thousand times the 50kWp trigger referred to above.

Inadequate Public Consultation

The public consultation has been a token, box-ticking exercise. There was no opportunity for a public meeting due to Covid-19 despite numerous requests for a delay from many people who were consulted.

There are many factual errors in the application documents and several consultees are still waiting for responses to their questions.

Amendments to the initial proposal following consultation were minimal. Comparison with the consultation process for the DPD and Southwell Area Plan illustrates this inadequacy.

Landscape Impact

It is difficult to exaggerate the dominance of the countryside around Southwell that a 100 hectare, 3 metre high ‘sea of metal’ would have. The applicant’s LVIA may confirm that there are proposals to ‘help comply with’ the relevant policies but they fail and do not protect and enhance local landscape features.

The Screened Zone of Theoretical Visibility map illustrates the extent of views affected and screening by deciduous vegetation will only be effective for half the year.

It is important that those making a decision on this application have made a site visit. Natural England’s response was based on an examination of the plans submitted and their response states only that they consider the proposal would ‘not have a significant adverse effect on

statutorily protected sites or landscapes'. It does not comment on the adverse effect on this non-protected landscape.

Flooding

The Lead Local Flood Authority's response of 'no objection' is qualified by several conditions and states that 'A detailed surface water management plan is required to ensure that the development is in accordance with NPPF and local planning policies. It should be ensured that all major developments have sufficient surface water management, are not at increased risk of flooding and do not increase flood risk off-site.'

Past experience with developments in Southwell has demonstrated that this detailed plan is required at the application stage, enabling public and independent expert scrutiny, otherwise there can be no confidence that the conditions can and will be met.

Heritage Impact

Despite objections from several consultees the chosen access point is still alongside the Grade 2 listed church and opposite Grade2* listed Manor Farm.

The proposed development would destroy the whole character of Halloughton Conservation Area, have a severe impact on views over Southwell Conservation Area and on the unspoilt countryside around Westhorpe Conservation Area.

The archaeological survey is inadequate. The limitations of the type of geophysical survey carried out are widely recognised and there is other evidence of potential archaeology on the site.

Amenity Impact

The development site is crossed by a number of public footpaths and bridleways as confirmed by the Rights of Way Officer, whose 'no objection' subject to conditions is based on the requirement that they should 'remain open, unobstructed and be kept on their legal alignment at all times.' However, if the development were to go ahead the people of Southwell and the many visitors to the area enjoying paths that link up to the Robin Hood Way would find this a greatly devalued experience. At a height of 3m (10ft), 1 m higher than a permitted domestic fence, the arrays of thousands of solar panels together with their associated security fencing and infrastructure would create an alien industrial feature in place of some of the most attractive countryside in Nottinghamshire.

Community Impact

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.

Its impact would be in marked contrast to community energy projects which unite communities, providing income to locals while protecting their environment and heritage.

Ecological Impact

The application fails to meet the requirements of SNP policy E3 (Green Infrastructure and Biodiversity) or policy E4 (Public Rights of Way and Wildlife Corridors) particularly in relation to the need for wild life corridors and buffer margins.

The ecological assessment report, produced from a desk based study and just one day of field survey in January, fails to identify the existing biodiversity threatened.

Loss of Agricultural Land

Food production is as necessary for human survival as the reduction of global warming. Most of the proposed development site is currently either cultivated or used for grazing and should continue for the production of food rather than green energy which can be done on poorer quality land. The application erroneously classifies this agricultural land as Grade 4 when it is classified as 3 by Defra and all local farmers.”

Comments on Amended Plans: “We continue to strongly object to this application.

We refer to the amended and additional documents submitted.

We have studied the revised application and confirm that our original objections have not been satisfied. The changes made and the additional information provided do not alter the scheme in any significant way, we therefore continue to strongly to object to this wholly unacceptable use of farm land and the destruction of the countryside. We refer you to our original submission of 9th August 2020 [...].

We would strongly endorse the submission of Mr John Martindale especially his expert professional assessment of the land quality. We also endorse the comments by Professor Margaret McCaskill and Professor Robert Usherwood.”

NSDC Environmental Health – Support – “Environmental Health have reviewed the documentation and support the current planning proposal. Environmental Health have considered the following points.

Noise Assessment

The applicant as part of the consultation process provided a noise assessment for the development. The applicant has used professional judgement and determined the use of BS8233 absolute noise standards to be used in the absence of development site noise monitoring data. The noise assessment report has indicated in the conclusions that noise levels are likely to be more prevalent to surrounding residential properties during the daytime hours and early morning or evening as battery stations operate to provide electricity to the National Grid at peak times, but are unlikely to exceed the standards in BS4142 for the lowest observed effect level.

Visual Impact

The applicant has provided an assessment of glint and glare from the solar farm. The report outlines the conclusions that mitigation of glint and glare is not required overall for the development due to natural boundary formations and vegetative cover. Where residential properties neighbour the development site, the applicant has proposed significant shielding will be applied on boundaries to domestic properties to reduce any risks of light pollution. The development is likely to have a visual impact in terms of amenity user perception.

However, the environmental health impacts of the development in terms of light pollution appear to be risk assessed by the applicant satisfactorily.

Recommendation for further consultation

Public Health England are the leading authority on health impact assessments and can consult on the health impacts to the local community from this development. Environmental Health can only give consultation on aspects of environmental impacts related to health, such as noise, light or air pollution. Both the physical and mental health impacts of the development need to be considered in the consultation process, since domestic properties lie on the boarder of the development. Therefore, Environmental Health recommend our partner organisation Public Health England is consulted (if not included) on the health impacts from the development as part of this consultee process.”

04.09.2020 – “I have looked at the report and the email and my comments are below. It states:

“Baseline Noise Assessment

Due to the effect of the of the global Coronavirus pandemic, it has not been possible to undertake reliable noise monitoring at the present time upon which to establish typical baseline noise data, as the present restrictions have resulted in many businesses either being closed or operating at reduced capacity, with considerable reductions also in road and rail traffic. The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.”

It goes on to say:

“During daytime periods, noise levels are likely to be typically attributable to distant road traffic from vehicles travelling along the A612 to the east and B6386 to the north, with noise from agricultural activities in the surrounding fields also likely to be audible at times. Given the distances to the roads and volumes of traffic, daytime noise levels are likely to be low, with background noise levels likely to be of the order of 35 dB LA90 during the daytime periods.

Overnight, road traffic will reduce, and typical background noise levels are likely to be very low and at or below a level of 30 dB LA90.”

Taking into account the suggested condition:

Prior to the commencement of development a Noise Attenuation Scheme will be provided to and approved in writing by the local planning authority which demonstrates that during the operational phase of the proposed development, the noise level arising from the development, as measured at the nearest sensitive receptors shall not exceed:-

(i) An Leq,1h value of 50 dB(A) during the period 0800 to 2200 hours from Monday to Saturday inclusive.

(ii) An Leq,15 min value of 40 dB(A) at any other time.

(b) All sound measurement shall be carried out in accordance with ISO

Recommendation 1996: 2007: Acoustics - Description and Measurement of Environmental Noise.

Potentially this would mean that at 50dB 08:00 to 22:00 that it is 15dB above background and likely to give rise to complaints.

Would a better condition be:

Prior to the commencement of development a Noise Attenuation Scheme will be provided to and approved in writing by the local planning authority which demonstrates that during the operational phase of the proposed development, the noise level arising from the development, as measured outside the nearest sensitive receptors shall not exceed 5dB below the existing background levels.

All sound measurement shall be carried out in accordance with ISO Recommendation 1996: 2007: Acoustics - Description and Measurement of Environmental Noise."

Additional comments 13.01.2021: Suggested condition - "The rating level of sound emitted from any fixed plant and/or machinery associated with the development shall not exceed background sound levels by more than 5dB(A) between the hours of 0700 - 2300 (taken as a 15 minute LA90 at the nearest sound-sensitive premises) and shall not exceed the background sound level between 2300 - 0700 (taken as a 15 minute LA90 at the nearest/any soundsensitive premises). All measurements shall be made in accordance with the methodology of BS4142 (2014) (Methods for rating and assessing industrial and commercial sound) and/or its subsequent amendments.

Where access to the nearest sound-sensitive property is not possible, measurements shall be undertaken at an appropriate location and corrected to establish the noise levels at the nearest soundsensitive property.

Any deviations from the LA90 time interval stipulated above shall be agreed in writing with the local planning authority.

Reason: To protect the amenities of nearby residents"

Public Health England – "Thank you for your consultation letter regarding the above application for a solar farm and battery stations. We do not routinely comment on local planning applications and do not appear to have had previous involvement with this site. However, if there are specific issues regarding public health that you would like our views on, please provide us with the details."

NATS (National Air Traffic Services) – *Support* - "The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted."

Comments on Amended Plans: "The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted."

The Environment Agency – "We have reviewed the submitted documents and on this occasion the Environment Agency will not be making any formal comment on the submission for the following reason:

From a flood risk perspective, the development falls within flood zone 1 and our standing advice (FRSA) applies which can be found on the <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas> pages of the Gov.uk website. It is for the Local Planning Authority to ensure planning submissions adhere to this advice. There are no other environmental constraints associated with the application site which fall within the remit of the Environment Agency.

The Lead Local Flood Authority, in this instance, (Nottinghamshire County Council) should be consulted on the proposals for their requirements regarding the disposal of surface water arising from the development and works near to ordinary watercourses which run through the site.

If, however, the proposal subsequently changes such that you feel that it may pose a significant environmental risk then please do not hesitate to contact us and we will be pleased to review our response."

Comments on Amended Plans: "Having reviewed the amendments these do not appear to change our previous position and therefore our previous comments, issued on the 12/08/20 still stand and we have no further comments to add."

Nottinghamshire County Council Lead Local Flood Authority – "Nottinghamshire County Council as the Lead Local Flood Authority (LLFA) has reviewed the application which was received on the 15 Jul 2020. Based on the submitted information we have no objection to the proposals and can recommend approval of planning subject to the following conditions;

Condition

No part of the development hereby approved shall commence until a detailed surface water drainage scheme based on the principles set forward by the approved Calibro Flood Risk Assessment (FRA) ref. BR-629-007 dated 2 July 2020, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. The scheme shall be implemented in accordance with the approved details prior to completion of the development. The scheme to be submitted shall:

- Demonstrate that the development will use SuDS throughout the site as a primary means of surface water management and that design is in accordance with CIRIA C753.
- Limit the discharge rate generated by all rainfall events up to the 100 year plus 40% (for climate change) critical rain storm 5 l/s rates for the developable area.
- Provide detailed design (plans, network details and calculations) in support of any surface water drainage scheme, including details on any attenuation system, and the outfall arrangements. Calculations should demonstrate the performance of the designed system for a range of return periods and storm durations inclusive of the 1 in 1 year, 1 in 2 year, 1 in 30 year, 1 in 100 year and 1 in 100 year plus climate change return periods.
- For all exceedance to be contained within the site boundary without flooding new properties in a 100year+40% storm.
- Evidence of how the on-site surface water drainage systems shall be maintained and managed after completion and for the lifetime of the development to ensure long term

Reason: A detailed surface water management plan is required to ensure that the development is in accordance with NPPF and local planning policies. It should be ensured that all major developments have sufficient surface water management, are not at increased risk of flooding and do not increase flood risk off-site.

Informative

We ask to be re-consulted with any changes to the submitted and approved details of any FRA or Drainage Strategy which has been provided. Any deviation from the principles agreed in the approved documents may lead to us objecting to the discharge of conditions. We will provide you with bespoke comments within 21 days of receiving a formal consultation."

Trent Valley Internal Drainage Board – "We refer to the above application and make the following observations: The site is outside of the Trent Valley Internal Drainage Board district but within the Board's catchment. There are no Board maintained watercourses in close proximity to the site. Surface water run-off rates to receiving watercourses must not be increased as a result of the development. The design, operation and future maintenance of site drainage systems must be agreed with the Lead Local Flood Authority and Local Planning Authority."

NCC Highways – 4.8.20 – "The Highway Authority understand that this is a full planning application in support of the construction of a solar farm on land to the north of Halloughton.

Vehicular access in the form of a double width traditional farm gate is proposed from Bridle Farm Road, an adopted no through road which adjoins with the A612 Highcross Hill, approximately 45-50m east of the proposed site access.

Having considered the proposed site access arrangements, it appears that the proposed vehicular access would necessitate the removal of a mature poplar tree belonging to the Highway Authority, as well as be located adjacent to a watercourse which has railings as a barrier. The Highway Authority would advocate the retention of this tree, rather than its removal and therefore would ask that the proposed access is relocated away from the tree and watercourse, taking note of the size of the established root system and instead look to be located closer to the existing street lighting column.

The revised drawings should be submitted as individual drawings, as opposed to attachments to the Construction Management Traffic Plan and should be clean of any unnecessary layers. As with the initial submission they should be supported by suitable swept path analyses of the largest vehicle anticipated to visit the site during the construction and or operational phases.”

Comments on Amended Plans: “Further to comments dated 4th August 2020, revised access details have been submitted and are generally found to be acceptable. These include the ‘Site Access Arrangement’ document that includes a tree protection scheme, together with Figures 1A and 2A.

When the affected tree was inspected last summer there were concerns about its health and long-term safe retention. Since then this Authority has decided to fell the tree, close to ground level. It is intended to carry out this work by the end of March 2021. In the meantime, if the solar farm works commence, the tree protection plan is acceptable.

Notwithstanding the above, the amended access position assists in protecting the watercourse and dealing with vehicle swept paths.

No objections are raised subject to the following conditions:

No part of the development hereby permitted shall commence until the access to the site has been completed (as shown on submitted Figure 1A) and surfaced in a bound material for a minimum distance of 10m behind the edge/extent of the public highway in accordance with details to be submitted and approved by the LPA in writing.

Reason: In the interests of highway safety and convenience.

No part of the development hereby permitted shall commence until a vehicular crossing of the highway footway & verge is available for use and constructed in accordance with the Highway Authority specification to the satisfaction of the Local Planning Authority.

Reason: To protect the structural integrity of the highway and to allow for future maintenance.

The Tree Protection Scheme described in the submitted ‘Site Access Arrangement’ document shall be implemented unless otherwise agreed in writing by the LPA.

Reason: To protect a substantial highway tree.

NOTES TO APPLICANT:

The development makes it necessary to construct a vehicular crossing over a footway and verge of the public highway. These works shall be constructed to the satisfaction of the Highway Authority. You are, therefore, required to contact the County Council's Agent, Via East Midlands to arrange for these works to be carried out. Email: licences@viaem.co.uk Tel. 0300 500 8080 and further information at:

<https://www.nottinghamshire.gov.uk/transport/licences-permits/temporary-activities>"

NCC Rights of Way – “Thank you for consulting the Rights of Way Team. I have checked the working copy of the Definitive Map of recorded Public Rights of Way and can confirm that Southwell Public Footpath No. 42, Southwell Public Footpath No. 43 and Southwell Public Bridleway No 74 all cross the land edged in red on the location plan. Southwell Byway No.80 which becomes Halloughton Byway No. 9 at the parish boundary is adjacent to the south-west corner of the site. I attach an extract of the working copy of the Definitive Map for your reference. We acknowledge the applicant has included the Public Rights of Way on the Site Layout and Planting Proposals plan (DRWG No. P18-2917_12).

The Rights of Way Team have no objection to the proposal however we would request that the applicant is advised of the following:

- The Public Rights of Way should remain open, unobstructed and be kept on their legal alignment at all times. Vehicles should not be parked on the Public Rights of Way or materials unloaded or stored on the Public Rights of Way so as to obstruct the path.
- There should be no disturbance to the surface of the Rights of Way without prior authorisation the Rights of Way team.
- The safety of the public using the paths should be observed at all times. A Temporary Closure of the Public Rights of Way may be granted to facilitate public safety during the construction phase subject to certain conditions. Further information and costs may be obtained by contacting the Rights of Way section. The applicant should be made aware that at least 5 weeks' notice is required to process the closure and an alternative route on should be provided if possible.
- If the route is to be fenced, the applicant should ensure that the appropriate width(there may be a recorded width as part of the Definitive Map statement) is given to the path and that any fence is low level and has an open aspect to meet good design principles. As a guide the following minimum widths should be applied unless a recorded width exists: Footpaths 2m surface with 1m wide grass verge on either side, Bridleways 3m surface with 1m wide verge on either side. We note on the proposed planting plan (DRWG No. P18-2917_12) that the applicant proposes planting a new hedgerow to screen the development from Southwell Public Bridleway No.74. We welcome this proposal however we would request that the hedge is planted so as not to encroach on the width of the bridleway – the minimum widths should be applied with the established hedgerow in mind (i.e. a

mature hedgerow is likely to be 2m wide) this should not impact on the minimum width of the Public Bridleway.

- If a structure is to be built adjacent to the public footpath, the width of the right of way is not to be encroached upon.
- Structures cannot be constructed on the line of the right of way without the prior authorisation of the Rights of way team. It should be noted that structures can only be authorised under certain criteria and such permission is not guaranteed
- Where the right of way runs across the site, there are currently open fields on either side with no adjacent boundary. This open aspect should be retained as far as is practicable as part of any development, with good practice design principles applied to either ensure that the route does not become enclosed and/or is incorporated it as part of a greenspace corridor.
- The applicant should be made aware that both existing hedgerows and trees alongside Public Rights of Way are the responsibility of the owner/occupier of the land. Future maintenance of the boundary hedges and trees should be planned into any maintenance programme so as to prevent them interfering with the use of the Public Right of Way.”

13.08.20 – “It has been brought to our attention that Southwell Bridleway No. 74 is shown wrongly on the Site Layout and Planting Proposals Plan (Drawing No: P18-2917_12). Where the route leaves Cotmoor Lane on the northern tip of Halloughton Wood the route enters the first field then turns in a northerly direction following a row of existing trees. The route is actually on the Western side of the row of trees (staying in the first field) at this point not along the eastern side (in the second field) as shown on the plan.

We presume that the CCTV cameras will not overlook the Public Rights of Way and be compliant with GDPR. Can this be confirmed.

We would also like to request the following in the form of planning conditions:

That prior to the construction phase, the applicant provide a cross-section for approval by the Rights of Way Team. This should illustrate the finished view of the Bridleway showing the width and aspect of the route once the proposed development is complete and planting established. As the path is currently of an open aspect we would like to see the path within a broad green corridor to retain the current open aspect and feel of the route as much as possible. In particular the finished width of the bridleway should be agreed with the Rights of Way Team prior to the construction phase.

That the applicant provide a clear plan of ongoing future maintenance particularly to include vegetation management (sides, above and surface) alongside the Public Rights of Way affected (particularly Southwell Bridleway No. 74) As a 300m (approx.) stretch of Southwell Public Bridleway No. 74 is to be potentially enclosed by the proposed development it will be necessary to consider the surface treatment of this section of Bridleway. The details of any surface treatment should be agreed with the Rights of Way Team prior to construction.”

Comments on Amended Proposals: “Thank you for your consultation about the above Planning application. Please see our previous comments (dated 28/07/2020) and additional comments (dated 13/08/2020) with regard to the Public Rights of Way and the extract of the working copy of the Definitive Map which shows the legal line of the recorded Public Rights of Way. Public Rights of Way are ‘Highways’ and as such are afforded the same legal protection as other highways such as a main road or dual carriageway.

We would like to re-iterate our request for a planning condition with regard to the treatment of Southwell Public Bridleway No.74 where passes through the site (West to East). That the applicant submits a cross-section of the Bridleway for approval by the Rights of Way Team. This should illustrate the finished view of the Bridleway showing its completed width including verge and established hedgerows. As the path currently has an open aspect we would like to see the path accommodated within a broad green corridor to retain the current open feel and aspect. (for example A 10 m wide green corridor in which the bridleway passes will allow access for maintenance of hedgerows by the applicant thereby prevent overhanging shrubs and trees interfering with or obstructing the use of the path. It also lessens the chance of the route becoming poached and boggy in winter or wet conditions.

We note the comments provided by the Ramblers with regard to the unrecorded route of a Public Right of Way and acknowledge the applicant’s intention to accommodate the route. However, there is some discussion about the correct alignment and status of the route which will need to be agreed with Nottinghamshire County Council’s Countryside Access Team.”

09.02.2021 – “I’ve checked the new plan and can confirm that as Southwell Bridleway No.74 will now be along the edge of an open field. So long as the bridleway is not going to be enclosed by a fence or other boundary feature it is no longer necessary to include the condition we requested. There appears to be minimal physical impact to the bridleway apart from where the site access road crosses it.

With regard to the historic route to the east of the site. I have asked our Definitive Map colleagues at Nottinghamshire County Council to check the accuracy of the route and they or I will get back to you if there are any issues. I am a little confused about the southern end of the route as it seems to peter out on the revised plan.”

Ramblers Association - “On the basis of new information recently received we wish to lodge a further urgent OBJECTION to this development. We have good grounds to believe that there is a historical Right of Way (ROW) running through the eastern edge of the site and we will be submitting a claim for its reinstatement as a matter of some urgency. This ROW runs from a right-angled bend on the minor road running south from Stubbins Lane (Grid Reference 691522) and ends at the junction of the road running through Halloughton with the A612.

The claim will be based on 1910 Finance Act records which show that a deduction of £5 tax was allowed in compensation for the presence of the ROW. These deductions were the subject of a legal agreement between the landowner and the tax authorities. As such, they carry a good deal of weight. We are also pursuing this claim because we feel it would result in a valuable addition to the ROW network and would result in walkers being less exposed to traffic on the A612.”

Comments on Amended Proposals: “We wish to reiterate our OBJECTION to this development for two reasons.

1. LANDSCAPE DISTURBANCE. This large scheme will be visually intrusive. The following is a direct quote from the BRE Guidance on Large Scale Ground Mounted Solar PV Systems:

"Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly FLAT...and not cause undue impact to NEARBY DOMESTIC PROPERTIES" (my capitals)

This is patently not the case here with involvement of a large swathe of picturesque undulating countryside close to the village of Halloughton.

Ramblers is in principle supportive of renewal energy schemes but, to quote directly from our policy statement:

"In planning...every effort should be made to minimise the impact on people 's ability to relax in the countryside, which is important for health and well-being"

Again, this is is not the case here. The northern section of the development, for example, is bordered on the N by Southwell Footpath 43 (length 0.9 miles) and on the W by Footpath 42 (0.8 miles). Similarly the southern section is bordered by Southwell Bridleway 74 (1.1 miles) which also crosses part of the site.

2. UNRECORDED RIGHT OF WAY: As mentioned in my comment of August 17, we have good grounds to believe that an unrecorded ROW crosses part of the site. The developers have accepted the existence of this ROW and have entered discussions with Stephen Parkhouse, one of my specialist colleagues in Notts Area Ramblers. It would seem injudicious to allow the development to proceed while this matter remains unsettled.”

Ministry of Defence – “The applicant is seeking full planning permission for the Construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure.

The application site is approximately 6.43km from the centre of the runway at RAF Syerston and occupies the statutory birdstrike safeguarding zone surrounding the aerodrome.

Birdstrike safeguarding zone

Within this zone the principle concern of the MOD is the creation of new habitats may attract and support populations of large and or flocking birds close to the aerodrome.

The proposals include drainage plans in the form of swales and an attenuation basin. On review of these drainage designs I can confirm they are unlikely to attract or support substantial numbers of hazardous birds.

The two bunded storage areas are larger and on the edges of the fields. Therefore, they have a higher potential to attract and support hazardous birds. However, as long as these areas are

generally dry, and hold water only during and immediately after heavy rainfall, then any attractant is likely to be minimal.

In summary, subject to the above requirements being included as a condition as part of any planning permission granted, the MOD has no objections to this application.

I would be grateful if you could confirm receipt of this letter and confirm that a relevant condition covering the MOD's requirements is included in any consent granted.

It is important that the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Newark and Sherwood district Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made."

Nottinghamshire Wildlife Trust – "Thank you for consulting Nottinghamshire Wildlife Trust on the above application. We have reviewed the documents including but not limited to the Ecological Assessment Report, the Biodiversity Management Plan and the GCN Presence or Absence (eDNA) Survey Report.

We would like to point out that the extended phase 1 habitat survey was carried out in January 2020, which is out of the optimal survey season (approximately April to September). However, as stated in the Ecological Assessment Report, due to the nature of habitats present, we do not have any concerns relating to the reliability of results obtained from the survey at this time of year.

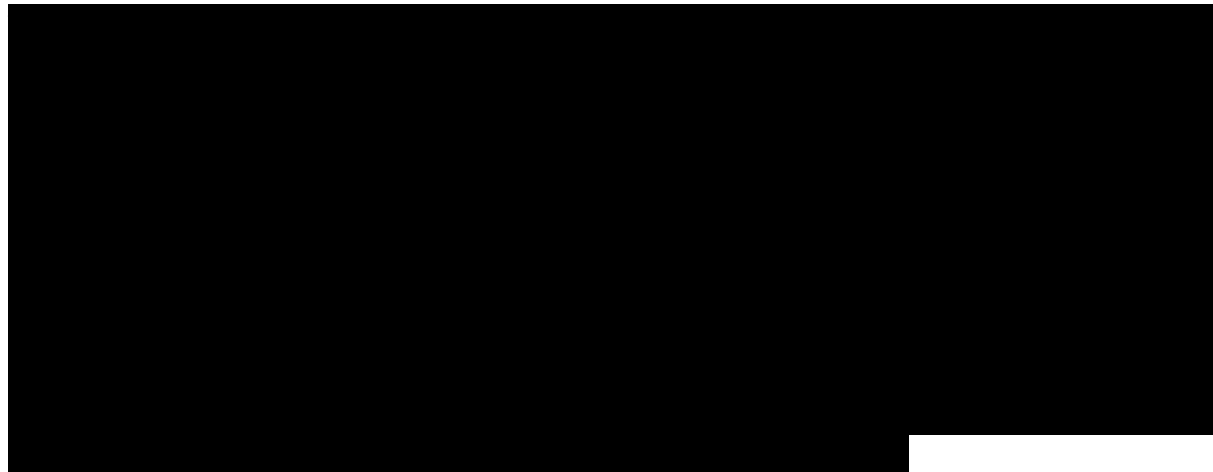
Habitats

Paragraph 3.4.4 states "Hedgerows and scattered trees located along field boundaries are considered likely to provide opportunities for arboreal nesting bird species and the arable crop fields (with grassland field margins) may potentially offer opportunities for ground nesting birds species such as lapwing and skylark." Furthermore, as stated in para 3.4.11, a number of scattered trees are located within the Site, primarily along boundary features including hedgerows and woodland habitats have the potential to support roosting bats. The value of the field boundary habitats such as hedgerows, trees and vegetation are evidently important to many species on site, including but not limited to bats and birds, reptiles, and hazel dormice. However, as mentioned in para 4.2.9, the area for the solar panel array layout has been designed to avoid impacts to field boundary features such as hedgerows and trees, and to protect the majority of woodland habitats within and immediately surrounding the site. Nevertheless, if the proposed development is altered and small sections of hedgerows/woodland will need to be removed, or vegetation greater than 15cm be required for removal (as suitable habitat for reptiles, BMP para 3.6.3), e.g. for site access, a series of Reasonable Avoidance Measures (RAMs) should be submitted to avoid the potential for inadvertent impacts on individual animals (such as reptiles), further information supplied in the BMP) if present and this should be secured through a suitably worded planning condition.

Water Vole/Otter

We agree that the watercourses within and around the site should not be directly affected by the development, especially with the addition of a 5m buffer from the watercourses which

will also be fenced for added security (para 4.3.30). Furthermore, implementation of standard good practice pollution prevention and site runoff control measures will ensure there is no indirect impacts on these species. This is mentioned multiple times throughout the Ecological Assessment report and also in the Biodiversity Management Plan (para 3.1.2), therefore we would like to advise that further information should be provided to Newark and Sherwood District Council regarding the standard good practice measures that will be taken to ensure no reduction in water quality occurs, this could be added into the BMP.



GCN

EDNA surveys of accessible ponds found P12 and P13 to be positive for great crested newts and P14 and P15 to be negative. However, we are pleased that the solar panel layout and construction area has been designed to maintain suitable protection buffers around trees, ponds, and hedgerows, and terrestrial habitat adjacent to ponds identified as supporting great crested newts. We fully support the ecologists recommendations made in para 4.3.46 that specific mitigation will be employed to protect great crested newts and ensure the continued favourable conservation status of the local population and the avoidance of harm to individual animals potentially present in or near working areas. We therefore recommend that a RAMS (Reasonable Avoidance Measures) should be submitted and secured through a planning condition. Furthermore, in the event that RAMs are not sufficient to safeguard GCN, certain works may require to be undertaken under a Low Impact Class Licence (LICL), or full European Protected Species Mitigation (EPSM) licence from Natural England, either of which should be supported by a detailed Method Statement.

Non-Statutory Designated Sites

We fully agree with the ecologist and welcome the recommendation to establish a buffer zone around works to ensure the development to the north and south does not encroach into Westhorpe Dumble LWS. Furthermore, we are pleased to see the ecologists recommendations to implement standard good practice pollution prevention and runoff control measures during construction and operation of the solar farm, which will prevent any potential for indirect effects to the LWS. In order to protect the three LWSs (Halloughton Wood LWS, Cotmoor Lane LWS, and Westhorpe Dumble Head Drain LWS) we welcome the suggested buffer of at least 15m, which will be adopted around the ancient woodland;

Halloughton Wood and would advise this is secured through a suitably worded planning condition.

Birds

We would like to reiterate that in order to avoid impacts on breeding birds, we fully support the ecologists recommendations and recommend that preparatory site clearance and associated vegetation removal takes place where possible outside of the bird breeding season (March-August inclusive). If this is not possible and vegetation works are necessary during the breeding season, any suitable nesting habitat to be affected by works will be checked by a suitably experienced ecologist prior to works commencing. To ensure that breeding birds are protected from harm we advise that a condition should be imposed requiring that “No removal of hedgerows, trees, shrubs, brambles or ground-nesting bird habitat shall take place between 1st March and 31st August inclusive, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period, and details of measures to protect the nesting bird interest on the site, have first been submitted to and approved in writing by the local planning authority and then implemented as approved.”

Bats

The trees that are due to be removed do not have any bat roost potential (para 4.3.13) due to the young age of the woodland. We would therefore like to reiterate the ecologist's recommendations that if the development plans are amended and additional trees are to be impacted, further surveys may be required to determine presence/absence of roosting bats, following BCT guidelines. We would also like to reiterate the lighting recommendations made in para 4.3.19 and further guidance is provided in the BCT guidance (2018) Bats and Lighting in the UK: Bats and the Built Environment Series and these should be secured through a suitably worded planning condition.

Biodiversity Management Plan (BMP)

We are generally pleased with the information provided within the BMP and we have noted that the creation of new hedgerow, tree belt, swale, grassland, field margins and species rich seed mixes will provide favourable habitat for a range of species. After consulting the Site Layout and Planting Proposals Plan (which sets out the landscape planting and maintenance specifications) in conjunction with the BMP, we are pleased with the native species included in the native hedgerow and native tree planting schedule. We would like to reiterate that all new planting should consist of plant stock of guaranteed **native genetic origin and ideally of local provenance**. We are also pleased to see that section 7 contains the indicative management schedule detailing which activities will commence within the first planting period after construction.

In order to ensure the ongoing habitat management detailed in the BMP (Section 5) and the ecological monitoring mentioned (Section 6), we would like to recommend a condition requiring the implementation of the BMP for the lifespan of the development.

Summary

We are generally happy with the methodologies and conclusions made within the report and believe that so long as all mitigations and recommendations are adhered to and implemented (through the use of suitable planning conditions), there should be no detrimental impact to

the wildlife and habitats on site. Furthermore, as mentioned in para 4.2.8 of the report (based on the RSPB briefing note on Solar Energy), biodiversity gains are possible where intensively cultivated arable or grazed grassland is converted to extensive grassland and/or wildflower meadows between and/or beneath solar panels and in field margins. Therefore, we believe that through the creation of the above mentioned habitats, biodiversity net gains on site could be achieved.”

Natural England – “Thank you for your consultation on the above dated 15 July 2020 which was received by Natural England on 15 July 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND’S ADVICE: NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England’s generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Natural England has issued Standing Advice to assist Local Planning Authorities and developers in deciding whether there is a reasonable likelihood of protected species being present on a proposed development site. It provides detailed advice on those protected species most often affected by development to enable an assessment to be made of the suitability of a protected species survey and, where appropriate, a mitigation strategy to protect the species affected by the development.”

Comments on Amended Plans: “Natural England has previously commented on this proposal and made comments to the authority in our letter dated 31 July 2020 (our ref 322537).

The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.”

Tree Officer – “The tree constraints plan submitted with this application indicates that the proposal can be achieved with minimal loss of existing green infrastructure if suitable protection measures are incorporated during construction activities.

However, the proposed use of plastic mesh fencing is unlikely to be successfully retained in position as required so I would suggest a compromise of staked chestnut paling is investigated instead.

Although broad landscaping proposals have been shown there are no details of tree/hedge size or density.

Proposed tree species is very limited--there is ample opportunity to introduce greater biodiversity into the new planting schedule.

Recommend any approval has attached conditions:

1. No works or development shall take place until an arboricultural method statement and scheme for protection of the retained trees/hedgerows has been agreed in writing with the District Planning Authority. This scheme shall include:

- a. A plan showing details and positions of the ground protection areas.
- b. Details and position of protection barriers .
- c. Details and position of underground service/drainage runs/soakaways and working methods employed should these runs be within the designated root protection area of any retained tree/hedgerow on or adjacent to the application site.
- d. Details of any special engineering required to accommodate the protection of retained trees/hedgerows (e.g. in connection with final hard surfacing).
- e. Details of construction and working methods to be employed for the installation of drives and paths within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.
- f. Details of timing for the various phases of works or development in the context of the tree/hedgerow protection measures.

2. All works/development shall be carried out in full accordance with the approved arboricultural method statement and tree/hedgerow protection scheme.

3. Prohibited activities

The following activities must not be carried out under any circumstances.

- a. No fires to be lit on site within 10 metres of the nearest point of the canopy of any retained tree/hedgerow on or adjacent to the proposal site.
 - b. No equipment, signage, fencing etc shall be attached to or be supported by any retained tree on or adjacent to the application site,
 - c. No temporary access within designated root protection areas without the prior written approval of the District Planning Authority.
 - d. No mixing of cement, dispensing of fuels or chemicals within 10 metres of any retained tree/hedgerow on or adjacent to the application site.
 - e. No soak- aways to be routed within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.
 - f. No stripping of top soils, excavations or changing of levels to occur within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.
 - g. No topsoil, building materials or other to be stored within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.
 - h. No alterations or variations of the approved works or protection schemes shall be carried out without the prior written approval of the District Planning Authority.
4. No works or development shall take place until the District Planning Authority has approved in writing the full details of every tree, shrub, hedge to be planted (including its proposed location, species, size and approximate date of planting) and details of tree planting pits including associated irrigation measures, tree staking and guards
5. The approved landscaping scheme shall be carried out within 6 months of the completion of the development, unless otherwise agreed in writing with the District Planning Authority. If within a period of 7 years from the date of planting any tree, shrub, hedgerow or replacement is removed, uprooted, destroyed or dies then another of the same species and size of the original shall be planted at the same place. Variations may only be planted on written consent of the District Planning Authority.”

Comments on Amended Plans: “Details of tree /hedge protection within the site are not noted and planting details are sparse.

Recommend approval of revised scheme with previously recommended conditions:

1. No works or development shall take place until an arboricultural method statement and scheme for protection of the retained trees/hedgerows has been agreed in writing with the District Planning Authority. This scheme shall include:
- a. A plan showing details and positions of the ground protection areas.
 - b. Details and position of protection barriers .
 - c. Details and position of underground service/drainage runs/soakaways and working methods employed should these runs be within the designated root protection area of any retained tree/hedgerow on or adjacent to the application site.

d. Details of any special engineering required to accommodate the protection of retained trees/hedgerows (e.g. in connection with final hard surfacing).

e. Details of construction and working methods to be employed for the installation of drives and paths within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.

f. Details of timing for the various phases of works or development in the context of the tree/hedgerow protection measures.

2. All works/development shall be carried out in full accordance with the approved arboricultural method statement and tree/hedgerow protection scheme.

3. Prohibited activities

The following activities must not be carried out under any circumstances.

a. No fires to be lit on site within 10 metres of the nearest point of the canopy of any retained tree/hedgerow on or adjacent to the proposal site.

b. No equipment, signage, fencing etc shall be attached to or be supported by any retained tree on or adjacent to the application site,

c. No temporary access within designated root protection areas without the prior written approval of the District Planning Authority.

d. No mixing of cement, dispensing of fuels or chemicals within 10 metres of any retained tree/hedgerow on or adjacent to the application site.

e. No soak- aways to be routed within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.

f. No stripping of top soils, excavations or changing of levels to occur within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.

g. No topsoil, building materials or other to be stored within the root protection areas of any retained tree/hedgerow on or adjacent to the application site.

h. No alterations or variations of the approved works or protection schemes shall be carried out without the prior written approval of the District Planning Authority.

4. No works or development shall take place until the District Planning Authority has approved in writing the full details of every tree, shrub, hedge to be planted (including its proposed location, species, size and approximate date of planting) and details of tree planting pits including associated irrigation measures, tree staking and guards

5. The approved landscaping scheme shall be carried out within 6 months of the completion of the development, unless otherwise agreed in writing with the District Planning Authority. If within a period of 7 years from the date of planting any tree, shrub, hedgerow or replacement is removed, uprooted, destroyed or dies then another of the same species and size of the original shall be planted at the same place. Variations may only be planted on written consent of the District Planning Authority."

Landscape Consultant VIA East Midlands – “1.Introduction

The following comments have been prepared by Helen Jones of Via East Midlands Limited, acting as a landscape consultant to Newark and Sherwood District Council (NSDC). These comments have been formulated on the basis of the submitted information detailed below. A site visit was made to the study area and representative viewpoints by Helen Jones on 26th August 2020.

The Environmental Management and Design (EMD) Team have examined the following information to make these comments (only information that is relevant to Landscape and Visual Impact is listed below).

Documents

- Application Form dated 7th July 2020
- Agricultural Land Classification Report – Davis Meade – 16th April 2019
- Arboricultural Impact Assessment – Barton Hyett Associates – Revision A 26th June 2020
- Construction Traffic Management Plan – Pegasus Group – July 2020 AJ/OJBS/AG/BB P18-2917
- Design and Access Statement – Pegasus Group – July 2020 SC/OH/RG P18 - 2917
- Ecological Assessment Report - Avian Ecology – JBMSO -592-1248 version 2 - 9th July 2020
- Biodiversity Management Plan – Avian Ecology - JBMSO -592-1248 version 2 - 9th July 2020
- Flood Risk Assessment – Calibro – BR-629-0007 revision 03 – 2nd July 2020
- Solar Photovoltaic Glint and Glare Study – Page Power – G530A – version 2 – 7th July 2020
- Heritage Assessment – Pegasus Group – July 2020 RGO – P18 -2917
- Landscape and Visual Impact Assessment – Pegasus Group - July 2020 – P18-2917 19A
- Planning Statement – Pegasus Group – July 2020 SC/OH/RG P18-2917/PL
- Statement of Community Involvement – Pegasus Group – July 2020 SC/OH/RG P18 - 2917 PL

Comments on the application

- NCC Highways – Newark area - HW – 16th July 2020
- Tree consultant – Graham Wilson to HW - North Kesteven District Council – 27th July 2020
- NCC Rights of Way – Sue Jarczewski to HW - 28th July 2020 and 13th August 2020
- Nottinghamshire Wildlife Trust – Elizabeth Cope to HW - 2nd September 2020
- Neighbour or public comments – various dates

Drawings

- Site location plan – Drawing reference P18-2917_02 Rev D – Pegasus Environment 15 April 2020
- Site layout and Planting Proposals – Drawing Reference P18-2917 _12 Rev H – Pegasus Environment 29 June 2020
- Indicative WPD and Customer Compound Layout – HLG-01- 2002 Rev 01 Sheet 1 of 1 – HVSS – 7th February 2020

- Indicative WPD and Customer Compound Elevations – HLG-01- 2002 Rev 01 Sheet 1 of 1 – HVSS – 7th February 2020
- Typical Fence, track and CCTV Details – JBM- HALLOU- SD 02 – Helioworks 16th March 2020
- Typical Trench Section Details – JBM- HALLOU- SD 03 – Helioworks 16th March 2020
- Typical Inverter Substation Details – JBM- HALLOU- SD 04 – Helioworks 16th March 2020
- Typical Spares Container Details – JBM- HALLOU- SD 05 – Helioworks 16th March 2020
- Typical Battery Storage Systems Details– JBM- HALLOU- SD 06 rev A – Helioworks 22nd May 2020
- Typical Customer Switchgear Details– JBM- HALLOU- SD 07 rev A – Helioworks 21st May 2020

2. Background

A Landscape and Visual Impact Assessment (LVIA) accompanies the full planning application. An independent review of this document by a qualified Landscape Architect was requested by NSDC from the Environmental Management & Design (EMD) Team of Via East Midlands and these comments are provided here.

3. The existing site and study area

A study area of 3 kilometres has been defined by the applicant within the LVIA report , which is accepted by the EMD Team considering the scale and type of the development proposed.

The proposed site is within the administrative district of Newark and Sherwood District Council, and within the area of jurisdiction of both Southwell and Halloughton Parish Councils, with approximately half of the proposed site located in each parish area. The proposed site is to the north western edge of the village of Halloughton, and 2.6 km from the village of Halam to the north. The largest adjacent settlements are the town of Southwell 2.7 km to the north east, and the larger town of Newark on Trent, 10 km to the east of the proposed site. Isolated farms in the area include New Radley Farm - with access off B6386 Oxton Road, Stubbins Farm – to the east of the proposed site (off Stubbins Lane), and Halloughton Wood Farm – to the south west of the proposed site.

The land use of the surrounding study area is predominately agricultural, but also contains transport infrastructure connecting the surrounding villages with the town of Southwell, the site of the 12th century Southwell Minster and many other listed buildings. The A612 connects Halloughton to Southwell and several roads converge in Southwell, the B6386 Oxton Road, Lower Kirlington Road, and Hockerton Road.

There are many small to medium woodland blocks within the study area. Halloughton Wood to the immediate south west of the site is classified as a replanted ancient woodland. There is also riparian woodland vegetation along small watercourses and dumble woodlands such as that of the Westhorpe Dumble which crosses the centre of the site. There are also well established mixed mature hedgerows with trees throughout the site, these contain tree species such as ash, oak and scots pine, and hedgerow species such as blackthorn, dog rose, elder, field maple, hazel, and hawthorn.

The study area has a gently sloping landscape containing deeper steep sided Dumble valleys such as Westhorpe Dumble. Generally, the land slopes away to the east towards Southwell which sits at 40 -50 AOD in the valley of the River Greet. To the south east of the site the landform slopes towards the River Trent which flows in a north east south west orientation towards Newark on Trent.

Heritage designations

The whole of the built area of the village of Halloughton is a Conservation Area and has the following listed buildings:-

C13 Tower House at Halloughton Manor Farm - grade II* listed

The church of St James, Halloughton - grade II listed

Pigeoncote, granary and stable block at Manor Farm - grade II listed

Barn at Halloughton Manor Farm - grade II listed

Barn at Bridle Road, Farm - grade II listed

The centre of the town of Southwell to the north east is also a Conservation Area with many listed buildings including Southwell Minster which is Grade 1 listed (the Minster Church of St Mary the virgin and Chapter House, and the Bishops Manor and remains of Bishops Palace). The Conservation Area extends into the Westhorpe area of Southwell which lies to the north east of the proposed site area.

Ecological designations

There is one Site of Special Scientific Interest (SSSI) within the study area.

Newhall reservoir meadow – 1.7 km north west of the site.

The following Local Wildlife Sites are within 3 km of the site:-

Cotmore Lane Ref 2/719– within the northern area of the site

Radley House Scrub Ref 5/3390 – within the northern area of the site

Westhorpe Dumble Ref 2/524 – within the centre of the site

Westhorpe Dumble Head Drain Ref 2/724 – within the centre of the site

Halloughton Wood Ref 2/532 – immediately adjacent to the south west corner of the site

Cotmore Plantation Ref 2/723 – 0.3km west

Brackenhurst Ref 2/729 – 0.4 km west

Halloughton Verge Ref 2/525 – 0.6 km south east

Oxton Road woodland 5/3388 – 0.6kmwest

Halloughton Dumble Ref 2/540 – 0.6 km south west

Radley road grassland Ref 5/3391 – 0.6 km north west

Epperstone Dumble (north) Ref 2/531 – 1.7 km south west

Epperstone Dumble (south) Ref 1/113 – 3 km – south west

Foxhole Wood Ref 2/514 – 3 km south west

Thristley Coppice Ref 2/518 – 3 km south west

Halam Osier beds Ref 5/174 – 3km north east

Public Rights of Way

There is a network of PROWs within the study area, these are referred to in the LVIA by the numbers in brackets)

Southwell Footpath 43 – (209/43/2) – passes from the B6386 Oxton Road towards the northern edge of site before connecting with Southwell Footpath 42 (209/42/1)

Southwell Footpath 43 (209/43/1) – is located within northern extent of the site and continues in an easterly direction towards Southwell.

Southwell Footpath 42 – (209/42/1) – continues in a southerly direction before connecting with Southwell Byway 80 (209/80/2).

Southwell Byway 80 (209/80/2) - passes along the edge of Cotmore Plantation, to the west of the site.

Halloughton Byway 9 – (186/9/1) – passes along the edge of Cotmore Plantation, to the south west of the site.

Southwell Bridleway 74 (209/74/1) - crosses the central portion of the site, and continues past Stubbins Farm towards Cundy Hill Road.

Bridleway Halloughton 3 186/3/1) – lies to the south of Halloughton.

The long-distance footpath the Robin Hood Way passes to the east of the proposed site (at this point Southwell Footpath 37 – 209/37/2) and then up on to a ridgeline to the north of the site.

The proposed site

The proposed site may be divided into 2 halves, a northern section and a southern section separated by Southwell Bridleway 74 (209/74/1). The proposed site has an area of 107.81 hectares (taken from the application form dated 07.07.2020) and comprises 13 fields.

The land use of the proposed site is grazing pasture and cereal production, there is a single High Voltage power line passing from east to west, into which the solar farm electrical supply will connect; and a single line of telegraph poles to the far eastern side of the site.

The proposed access to the site is off Bridle Farm Road, which is a single track road which forms the main street through Halloughton Village. The road is not a through road but joins the access track into Halloughton Wood Farm. The proposed site access passes along a field boundary and adjacent to a small copse of plantation woodland to emerge onto Bridle Farm Road at the entrance to the village of Halloughton.

The boundaries of the proposed site are predominantly hedgerows with trees, some of the hedgerows are mature mixed species hedgerows. Small linear belts of trees are dotted

throughout the area. Westhorpe Dumble crosses the centre of the site on an east west axis with riparian vegetation, including mature trees along its course. Other small bands of riparian vegetation occur along smaller watercourses within the site.

The highpoint of the site is at 93m AOD in the far northwest corner, the lowest point is near to proposed site access in south east corner of the site at a height of 60m AOD.

The closest residential dwelling is New Radley Farm within the northern extent of the site, but which is excluded from the application area. Other close buildings include Stubbins Farm to the east of the centre of the site, Halloughton Wood Farm to the south west of the south east extension of the site and Thorney Abbey Farm on the B6386 to the north of northern boundary of the site.

Manor Farm on the north western edge of Halloughton village is approximately 215 metres from the closest point of the site boundary. There is also another group of houses which extend out from the north western edge of Halloughton village – Pear Trees, Orchard End and two further properties to the north of these (adjacent to viewpoint 11) which are approximately 85 metres from the site boundary.

4. The proposed development

The proposed development consists of 3 parts, all of these form part of the planning application area, including the 132kv substation:-

- The 132 kv substation which connects the main site to the electricity grid,
- The main site compound which will contain the ground mounted solar panels, with associated technical infrastructure inverters, a substation compound, as well as fencing , security cameras, 4.5 metre access tracks and a temporary construction compound
- The access track to the site is connected to Bridle Farm Road, Halloughton.

As shown on Site layout and Planting Proposals – Drawing Reference P18-2917 _12 Rev H – Pegasus Environment 29 June 2020.

Substation

This is shown on the following drawings:-

Indicative WPD and Customer Compound Layout – HLG-01- 2002 Rev 01 Sheet 1 of 1 – HVSS – 7th February 2020

Indicative WPD and Customer Compound Elevations – HLG-01- 2002 Rev 01 Sheet 1 of 1 – HVSS – 7th February 2020

Typical Customer Switchgear Details– JBM- HALLOU- SD 07 rev A – Helioworks 21st May 2020

The substation compound is situated in the southern half of the development and on the southern edge of the site. This compound will contain a control room, a switchgear room, and a transformer building which will connect, through disconnectors and circuit breakers, to pylons and the main DNO network. This compound will be surrounded by a 2 metre-high security palisade fence and will have pole mounted CCTV at a height of 3 m.

The height of the control room, switch gear room and transformer building will be 3.2 metres.

The height of the structures which connect with the existing pylons should be confirmed by the applicant.

The substation compound has been located where there are two blocks of existing woodland to the south west and south east which will provide some screening of the smaller buildings from the north western edge of the village of Halloughton.

The main solar farm site

This is shown on the following drawings:-

Site layout and Planting Proposals – Drawing Reference P18-2917 _12 Rev H – Pegasus Environment 29 June 2020

This will include the following components:-

Solar panels – the solar farm itself will consist of a linear array of panels mounted on a rack supported by metal poles, which would be pile driven or screwed into the ground to a depth of 1- 2 m to avoid the need for excavations. Between each string of panels there would be a distance of 4 – 10 metres to avoid inter panel shading. The panels will be mounted at around 0.8 -1050mm from the ground at the lowest point and will have a maximum height of 3 metres. The panels will be tilted between 15 and 25 degrees orientation to face due south towards the sun

Refer to drawing - Typical PV Table Details 3P rev A – JBM Solar - 16th June 2020

Refer to drawing - Typical PV Table Details rev A – JBM Solar - 16th June 2020

Battery Containers and Converter Boxes - 11 number – size 2900mm height x 12490mm length x 2440mm width, these will be located throughout the site at the edge of the fields of solar panels.

Refer to drawing - Typical Battery Storage Systems Details– JBM- HALLOU- SD 06 rev A – Helioworks 22nd May 2020

The colour of the various cabins has not been detailed at this stage; this information should be provided as a condition of the application. As the cabins are likely to be viewed against the landscape rather than the skyline, we would suggest that a green or grey brown colour would be the least intrusive.

Deer fence - A 2 m high timber post and mesh security fence (deer proof) will be erected around the perimeter of the site and between the areas of solar panels and the Public Rights of Way which pass through the Site.

Refer to drawing - Typical Fence, track and CCTV Details – JBM- HALLOU- SD 02 – Helioworks 16th March 2020

Access tracks - within the site, tracks will provide access to the substation and inverters. The tracks will be approximately 4.5 m wide (source Construction Traffic Management Plan) and will be constructed from stone on top of a geotextile membrane.

Refer to Drawing - Typical Fence, track and CCTV Details – JBM- HALLOU- SD 02 – Helioworks 16th March 2020

The Site will be accessed from Bridle Farm Road, the main road through the village of Halloughton. Full details of the access are available in the Construction Traffic Management Plan (Construction Traffic Management Plan – Pegasus Group and the Design and Access Statement. (Design and Access Statement – Pegasus Group).

Cables and trenches - cables buried in trenches will link the solar panels to the inverters and the substation

Refer to Drawing - Typical Trench Section Details – JBM- HALLOU- SD 03 – Helioworks 16th March 2020

Temporary Construction compound - A Temporary Construction Compound will be located within the application area which will be covered over with solar panels on completion. The length of the construction period will be 14-16 weeks. The location of this temporary construction compound should be clarified by the applicant as this is shown on the key of the layout drawing but not clearly shown on the drawing itself.

5. Physical Landscape Impact

An arboricultural assessment has been provided by the applicant (Arboricultural Impact Assessment – Barton Hyett Associates – March 2020 – reference 3180 Rev A – 26th June 2020 – updated layout)

This identifies 60 trees, 48 tree groups and 33 hedgerows within the proposed site area. Of these 19 trees and 13 tree groups are categorised as Category A High quality. T13, T16, T38, T42 are proposed to be felled for Arboricultural reasons. The report concludes that no trees, tree groups will require removal in their entirety. Sectional removals will be necessary to allow new access track to be constructed and allow access between fields, as well as minor sections (each of 1 metre) to allow the new perimeter fence to be installed.

With the proposed access to the site being by an existing farm track, there is potential for soil compaction and this area contains a high-quality tree group (G7) and a moderate quality tree group (G1). Therefore 100 linear metres of ‘no dig’ construction is proposed in this area to ensure that the root systems in this area is not compacted during construction. This area will have a sacrificial surface which will be removed after construction. Some canopy lifting of tree groups G1, G7 and G48 will also be required. However, these works will be in a limited area of the site and all other Infrastructure on site will have a low negative potential impact on existing vegetation.

The Construction Traffic Management Plan (Construction Traffic Management Plan – Pegasus Group) does not indicate that any additional hedgerow will need to be removed to create visibility splays at the site entrance on to Bridle Farm Lane. However, the NCC Highway comments (NCC Highways – Newark area - HW – 16th July 2020) does indicate that a mature Poplar tree belonging to the Highway Authority at the entrance to Halloughton village will need to be removed. This is a prominent tree at the entrance to the village and does not appear to be included in the Arboricultural Impact Assessment. The applicant should confirm if this tree will need to be removed or not.

Therefore, the physical landscape impact as a result of the proposed development is low provided that the mature Poplar does not need to be removed. An Arboricultural Method

statement and a finalised tree protection plan will be required as a condition of the application.

6. Impact on the Landscape Character

At a national level the proposed site is located in Natural England National Character Area 48 –Trent and Belvoir Vales.

At a regional level the site is located in Regional Landscape Character Type group 5 Village farmlands and division 5b wooded Village farmlands, of the East Midlands Regional Landscape Character Assessment.

At a local level the northern section of the application site is in the Mid Nottinghamshire Farmlands Landscape Character Area - Policy Zone 37 – Halam Village Farmlands with Ancient woodlands

For the Policy Zone 37 – Halam Village Farmlands with Ancient woodlands - the landscape condition is assessed as very good and the landscape sensitivity as high . The Policy Zone landscape action is Conserve.

The Policy Zone has the following characteristic features:-

- Very gently undulating and rounded topography.
- Medium distance views to frequently wooded skylines, although often enclosed by vegetation – hedgerows, woodland etc.
- Mixture of intensive arable fields with strongly trimmed hedges and some low intensity farming with permanent improved pasture.

The Policy Zone has the following Landscape actions:-

Landscape Features

- Conserve hedgerows and prevent fragmentation (through lack of management and intensification of arable farming).
- Conserve historic field pattern by containing and limiting any new development within historic enclosed boundaries.
- Conserve the ecological diversity and setting of the designated SINC.
- Conserve and enhance tree cover and landscape planting generally to improve visual unity and habitat across the Policy Zone.

Built Features

- Conserve the rural character of the landscape by limiting any new development to around the settlement of Halam.
- Maintain use of vernacular materials, style and scale in any new developments.
- Promote measures for reinforcing the traditional character of existing farm buildings using vernacular building styles.

The southern section of proposed site is in Mid Nottinghamshire Farmlands Policy Zone 38 – - Halloughton Village Farmlands the landscape condition is assessed as good, and the

landscape sensitivity as moderate. The Policy Zone Landscape action is Conserve and Reinforce.

The Policy Zone has the following characteristic features:-

- Very gently undulating and rounded topography.
- Medium distance views to frequently wooded skylines, although often enclosed by vegetation – hedgerows, woodland etc.
- Mixture of intensive arable fields with strongly trimmed hedges and some low intensity farming with permanent improved pasture.
- Small commercial agriculture – Mushroom Farm, Strawberry Polytunnels.
- Small industrial estate
- Leisure facilities surrounding Southwell – Golf Course, Horsey-culture, Sports Fields.

The Policy Zone has the following Landscape actions:-

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 SINC's 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.
- Recognise the contribution of existing heritage assets within Southwell, visible from the northern part of this DPZ, to the wider landscape character
- Ensure that development proposals address the policy approach set by the Core Strategy and Allocations and Development Management DPD, taking account of the Southwell Landscape Setting Study (November 2012)

A section of the southern part of the proposed site is within the Mid Nottinghamshire Farmlands Landscape Character Area - Policy Zone 39 –Thurgaton Village Farmlands with Ancient woodlands. This is not included in the description by the applicant, therefore information about PZ 39 should be added to this section of the LVIA. The landscape condition is assessed as very good, and the landscape sensitivity as high. The Policy Zone Landscape action is Conserve.

The Policy Zone has the following characteristic features:-

- Very gently undulating and rounded topography.
- Medium distance views to frequently wooded skylines, although often enclosed by vegetation – hedgerows, woodland etc.

- Mixture of intensive arable fields with strongly trimmed hedges and some low intensity farming with permanent improved pasture.
- Numerous blocks of woodland and plantation, of varying scale.
- Predominantly vernacular settlements and dwellings.
- Good network of mainly intact and well-maintained hedgerows.

The Policy Zone has the following Landscape actions:-

Landscape Features

- Conserve permanent pasture and seek opportunities to restore arable land to pastoral. •
- Conserve hedgerow planting along roadsides, seek to reinforce and enhance as appropriate.
- Conserve the biodiversity and setting of the designated SINC's, seek to enhance where appropriate.
- Conserve and enhance woodland/plantation blocks, seek to reinforce green infrastructure as appropriate.

Built Features

- Conserve the rural character of the landscape by concentrating new development around existing settlements.
- Conserve and respect the local architectural style and local built vernacular in any new development

Impact on the landscape features of the site

The LVIA considers the impact of the proposed development on a number of elements within the site, these are topography, trees and hedgerows and land cover.

Topography – the variations of topography in the landscape in which the site is located are typical of the wider vale landscape and therefore the value as a landscape element is low, landscape susceptibility is low because minimal excavation is required in order to construct the scheme, which leads to a low landscape sensitivity.

Changes to the topography of the site would be due to trenching for cabling, digging foundations for ancillary structures, supply and fixing of fencing and creation of a temporary construction compound. This is assessed as causing a negligible magnitude of change on the topography.

A low sensitivity combined with a negligible magnitude of change will have a negligible effect on topography, this is agreed by the EMD Team.

Trees and hedgerows – the boundaries of the site are mature hedgerows with mature hedgerow trees including oak, ash and scots pine which are assessed as having medium value and medium susceptibility for hedgerows, and a high susceptibility for trees due to the length of time they would take to establish and mature. The magnitude of change is assessed as low beneficial because the existing hedgerow and tree frameworks would be enhanced by gapping up and replanting.

A medium – high sensitivity combined with a low beneficial magnitude of change will lead to a minor – moderate beneficial effect on trees and hedgerows within the site, this is agreed by the EMD Team.

Landcover – the existing site is in agricultural use which is of low landscape value and low susceptibility and of low sensitivity. This will change to an area of solar panels set in a species rich grassland with a framework of hedgerows.

Physically the magnitude of change is high but the applicant states this is offset by the improvements in ecological bases and concludes that a medium magnitude of change combined with a low sensitivity would lead to a minor beneficial change in landcover.

The EMD Team do not agree with this statement in that it is focussed on the biodiversity aspects of the change and not on the perception of the change in the landscape. The applicant should revise their assessment to fully evaluate the perception of change in the landscape and provide further clarification on this issue.

Impact on the character of Landscape Policy Zones MN 37, 38 and 39

National landscape character – There are no statutory landscape designations within the study area. The landscape is assessed as being of medium value. The scheme will lead to loss of 100 ha of Trent and Belvoir vales landscape character area but there will be a net gain in the biodiversity of the NCA as a result of improvements in the hedgerow resource and additional tree planting. This will lead to a negligible effect on the landscape character as a whole, the EMD Team agree with this conclusion.

Regional landscape character – The landscape is assessed as being of medium value. The scheme will lead to loss of 100 ha of woodland village farmlands regional landscape type but there will be a net gain in the biodiversity of the RLCA as a result of improvements in the hedgerow resource and additional tree planting. This will lead to a negligible effect on the landscape character as a whole, the EMD Team agree with this conclusion.

Local Landscape character - The applicant states that the scheme will retain and enhance characteristics of Policy Zones 37, 38 (and 39) which range from medium – high landscape sensitivity. The magnitude of change on these policy zones is assessed as low which will lead to a moderate beneficial effect on all of the policy zones.

The EMD Team do not agree with this conclusion in that as above it is focussed on the biodiversity aspects of the change and not on the perception of the change in the landscape.

The applicant should revise their assessment to fully evaluate the perception of change in the landscape and provide further clarification on this issue.

Discussion

The EMD Team consider that the majority of the landscape assessment is accurate, and areas of agreement are detailed above. However, the EMD Team consider that it is more accurate to conclude that the impact of the proposed development on the landscape character of the Policy Zones will lead to a high magnitude of change on an area of high or medium sensitivity to change, which would lead to a major scale of effect on the Policy Zones. However, this will only be in an area close to the site within the actual zone of visual influence, outside of this area the effects on the local landscape will decrease to negligible rapidly. The applicant

needs to define the area over which these adverse effects occur, which is in turn is related to the visual assessment below. Whilst there are undoubtedly ecological benefits of the proposed scheme resulting in a biodiversity net gain, this needs to be separated from the physical changes to the landcover of the site which can only be described as high and adverse, the applicant needs to reconsider this issue.

What has also not been included as part of this assessment is the landscape effect at the construction stage of the project, and not just the visual effect of the proposed access route on the village of Halloughton, which is designated as a Conservation area and with adjacent listed buildings such as the church of St James. There will be a change in the perception of the landscape character of the village of Halloughton at the construction stage due to the presence of the access road emerging on to Bridle Farm Lane, the main route into the village, caused primarily by visual presence of construction vehicles, this effect has not been assessed and needs to be considered by the applicant .

7. Landscape Mitigation Proposals

The landscape proposals are shown on Site layout and Planting Proposals – Drawing Reference P18-2917 _12 Rev H – Pegasus Environment 29 June 2020. These consist of the planting of new hedgerows and infilling of gaps in the existing hedgerows to improve the site screening and retain the framework of hedgerow around the 13 fields in which the solar panels are to be located. In addition, there is an area of woodland planting, as well as the inclusion of swales. The detail of the landscape mitigation proposals, including the management of the features proposed, is described in the Biodiversity Management Plan (Avian Ecology - JBMSO -592-1248 version 2 - 9th July 2020).

The Biodiversity Management Plan is based on the Biodiversity Guidance of Solar developments (BRE 2014). It describes the attributes and maintenance regime for 1200m² of new planting included in the project. Elements of the design include:-

- 1000 m of new and infill hedgerow planting. It is confirmed that the species selection is compatible with the Mid Nottinghamshire Farmlands landscape character area.
- 0.43 ha of tree planting to create a 15-metre-wide tree belt to the south of the site , again species selection is compatible with the Mid Nottinghamshire Farmlands landscape character area.
- Species rich grassland to the solar park area – to be a Solar Park long term grazing mix, to be managed by either grazing or mechanical cutting.
- Field margins to be sown with Emorsgate EM2 standard general-purpose meadow mix.
- Swales – with a base width of 0.5m and a depth of 0.5 metres, these are primarily to accommodate runoff abut will also have biodiversity benefits , these are located to the south of the site adjacent to the substation area, and to the eastern edges of the site.
- Bird and bat boxes.

In addition to the above drawing and description, a summary of the enhancement measures should be provided in the LVIA document, this is in order that the focus of the description is based on the mitigation of landscape and visual effects rather than purely biodiversity aims.

8. Visual Impact

The applicant has selected 18 representative viewpoints to analyse the visual impacts of the proposed scheme. These viewpoints were agreed in advance with NSDC, and with the EMD team of Via East Midlands, and an additional 3 viewpoints (A,B and C) were requested from locations of heritage interest by NSDC, and an additional 1 viewpoint by Via East Midlands (viewpoint 18). It is noted that the viewpoint photographs have been taken in summer 2019 when the trees and hedgerows were in full leaf, in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLIVA3) viewpoint photographs should also represent seasonal changes. It is recommended that a set of viewpoint photographs is also included in the LVIA that shows the representative views and 3 additional heritage viewpoints when the vegetation is not in leaf.

The landscape consultant has prepared a ZTV drawing using digital terrain data (Figure 8 – Screened Zone of Theoretical Visibility - Landscape and Visual Impact Assessment – Pegasus Group). The visual impact of the development has been assessed at 3 m height to represent the general level of the highest point of the panels.

The applicant has identified that the Screened ZTV forms a constrained area extending out from the boundary of the site, with additional outlying areas of theoretical visibility on higher ground to the north west, north east, south east, and with a distinct, small area to the south of Southwell and to the east of the site. The ZTV covers the whole of the village of Halloughton. These visual impacts have been described in the LVIA and the sensitivity of the receptors and the magnitude of change as a result of the development has been assessed. These visual impacts have been summarised by the EMD team in the table below and the results discussed in the following section. The visual impacts are described at year 1 and Year 10 of the project.

Construction stage

No visual assessment has been made of the construction stage of the project. The construction stage is predicted to be 14 -16 weeks. In order to reduce visual impact during the construction stage and throughout the project, the substation compound has been located to the north west of a block of existing woodland which partially shields views of this part of the project from Halloughton to the south. The applicant should provide additional information about the visual impact of the structures which connect with the existing pylons in this section of the LVIA.

The other visual impact of the construction stage will be from vehicles bringing the components for the solar farm to the site. This is assessed to be on average 12 two-way movements per day during the construction period which will access the site from Bridleway Lane, Halloughton. It is not known if alternative routes had already been ruled out due to the impact on surrounding areas, the applicant should confirm this, and provide additional information about why this particular access route has been chosen.

Summary of scale of visual effect at Year 1 and Year 10

The views from the 18 representative viewpoints, and 3 additional heritage viewpoints are summarised by the EMD Team below. Any text in red is an EMD Team addition, where the EMD Team and the applicant do not reach the same conclusion, this is discussed below.

Viewpoint reference	Receptor type and sensitivity	Magnitude of change – year 1	Scale of Visual Effect – year 1	Scale of Visual Effect – year 10	Distance from site boundary
VP1-view from PRow bridleway 209/74/1 looking east	Recreational High sensitivity	Medium magnitude of change	Major scale of effect	Negligible scale of effect	76m
VP2 – view from PRow bridleway 209/74/1 looking west	Recreational High sensitivity	High magnitude of change	Major scale of effect	Moderate or? negligible Scale of effect Applicant to confirm if moderate or negligible, or moderate to negligible	0m
VP3 – view from PRow bridleway 209/74/1 looking west	Recreational High sensitivity	Low magnitude of change	Moderate scale of effect	Negligible Scale of effect	81.7m
VP4 – view from PRow bridleway 209/74/1 looking south	Recreational High sensitivity	Medium magnitude of change	Major scale of effect	Moderate to negligible Scale of effect	123.2 m
VP5 – view from PRow bridleway 209/74/1 looking south west	Recreational High sensitivity	Negligible magnitude of change (due to dense belts of trees and well-	Negligible Scale of effect	Negligible Scale of effect	137.7m

		established hedgerows)			
VP6 – view from Robin Hood Way Long distance footpath looking south west	Recreational High sensitivity	Negligible magnitude of change	Negligible Scale of effect	Negligible Scale of effect	819.8m
VP7 – view from unnamed local road looking west	Traveller Medium	Negligible magnitude of change	Negligible Scale of effect	Negligible Scale of effect	38.7m
VP 8 – View from the eastern edge of Halloughton looking north	Traveller Medium	Low magnitude of change	Minor scale of effect	Minor scale of effect	9.4m
VP9 – view from the churchyard of the church of st James, Halloughton looking north	Visitor to churchyard Medium	Low magnitude of change	Minor scale of effect	Minor scale of effect	75.9m
VP10 - View from PRowW bridleway 186/3/1 looking north	Recreational High sensitivity	Low magnitude of change	Moderate scale of effect	Negligible Scale of effect (due to maturing vegetation)	416m
VP11 – View from western edge of Halloughton , looking north	Traveller Medium	Low magnitude of change	Minor scale of effect	Negligible Scale of effect	229m

VP12 – View from southern extent of Cotmoor byway looking northeast	Recreational High sensitivity	Low magnitude of change	Moderate scale of effect	Negligible Scale of effect (due to maturing vegetation)	356.6m
VP13 – View from PRow footpath 209/42/1 looking south east	Recreational High sensitivity	Low magnitude of change	Moderate scale of effect	Negligible Scale of effect	7.8m
VP14 – View from PRow footpath 209/42/1 on the access track to New Radley Farm	Recreational High sensitivity	Medium magnitude of change	Major scale of effect	Moderate to negligible Scale of effect	10.4m
VP15 – View from PRow footpath 209/43/1 looking south	Recreational High sensitivity	High magnitude of change	Major scale of effect	Major scale of effect	0m
VP16 – View from PRow footpath 209/43/1 looking west	Recreational High sensitivity	Low magnitude of change	Moderate scale of effect	Negligible scale of effect	46.6m
VP17 – View from PRow footpath 209/43/2 on the access track to New Radley Farm, looking south west	Recreational High sensitivity	Negligible magnitude of change	Negligible scale of effect	Negligible scale of effect	149.4m
VP18 – View from Robin Hood Way	Recreational High sensitivity	Negligible magnitude of change	Negligible scale of effect	Negligible scale of effect	1783.4m

Long Distance footpath on Newhall Lane, looking south east					
Heritage A – View from Fiskerton Road near Brinkley Hall Farm, looking south	Traveller medium	Negligible magnitude of change	Negligible scale of effect	Negligible scale of effect	Applicant to confirm distance from proposed site boundary
Heritage B – View from PRow footpath 209/12/1, looking southwest	Recreational High sensitivity	Negligible magnitude of change	Negligible scale of effect	Negligible scale of effect	Applicant to confirm distance from proposed site boundary
Heritage C – View from the Grounds of Southwell Minster	Recreational High sensitivity	Negligible magnitude of change	Negligible scale of effect	Negligible scale of effect	Applicant to confirm distance from proposed site boundary

Discussion

The EMD Team is in agreement with the conclusions of the visual assessment for year 1 of the proposed scheme for the 18 representative viewpoints, and heritage viewpoints A and C. However, we are not in agreement with the assessment from Heritage viewpoint B from PRow footpath 209/12/1, looking southwest (Southwell Footpath 11 on the Southwell Heritage trail 2), this point is located on the high ground to the south of Southwell and to the east of the site and there is a distant view of the southern half of the site. We consider the scale of effect for Heritage viewpoint B should be minor for year 1 only.

For Year 10 of the visual assessment for some of the viewpoints, the change in scale of effect from year 1 to year 10 is large, for example for viewpoint 1 the scale of effect at year 1 is Major and this declines to negligible by year 10. This large scale of change relies totally on the successful establishment of the proposed hedgerows and the effective management of the

existing hedgerows. The applicant should reconsider the year 10 impacts and confirm that this degree of change is accurate.

The visual impact of the proposed scheme on residential properties, including from the north eastern edge of edge of Halloughton.

The visual assessment does not include any assessment from any residential properties which are normally considered to be of high sensitivity. Whilst it is accepted that the area to the north west of the village of Halloughton is not publicly accessible by Public Rights of Way; nevertheless an assessment of views of the site can be made from aerial photographs considering the amount of boundary vegetation to the properties and the distance from the boundary of the site.

This is a major omission in the LVIA considering that this area is approximately 200metres from the boundary of the proposed site and this information should be added either as a schedule of effects or as a written description. Similarly, the extent of views from the isolated farms - New Radley Farm, Stubbins Farm, Halloughton Wood Farm and Thorney Abbey Farm within the study area should also be recorded, even if the views are screened by surrounding mature vegetation.

9. Cumulative effects

No consideration of any cumulative visual impact has been made in the LVIA. The applicant should consider if there are any similar developments registered in the planning system within the study area and if there are, assess the cumulative impacts of schemes. If there are none proposed of a scale and type, then this should be stated.

10. Summary

- The LVIA has been carried out to the accepted best practice which is the Guidelines for Landscape and Visual Impact Assessment (GLIVA3) Third Edition published by the Landscape Institute and Institute of Environmental Managers and Assessment (April 2013), and the photography practice note – Landscape Institute 2019 Visual Representation of Development Proposals. Technical Guidance Note 06/19, with the exception of the issue noted below concerning the lack of viewpoint photographs when trees and hedgerow are not in leaf.
- The landscape assessment has referred to national, regional and local landscape character assessments. Only negligible landscape impacts have been identified on the national and regional landscape character types, which is agreed by the EMD Team.
- A section of the southern part of the proposed site is within the Mid Nottinghamshire Farmlands Landscape Character Area - Policy Zone 39 –Thurgaton Village Farmlands with Ancient woodlands, information about PZ 39 should be added to this section of the LVIA.
- The location and size of the temporary construction compound should be clarified by the applicant, as this is shown on the key of the layout drawing but not shown clearly on the drawing itself.
- The NCC Highway comments indicate that a mature Poplar at the entrance to Halloughton village will need to be removed, the applicant should confirm whether this tree needs to be removed or not.

- Landscape impact - The EMD Team do not agree with the assessment that there is a minor beneficial change in landcover throughout the site. This assessment has focussed on the biodiversity aspects of the change and not on the perception of the change in the landscape. The applicant should review and revise this assessment to encompass perceived change as part of the overall evaluation and provide an updated revision on this issue.
- Landscape impact - There will be a change in the perception of the landscape character of the village of Halloughton at the construction stage due to the presence of the access road emerging on to Bridle Farm Lane, the main route into the village, caused primarily by visual presence of construction vehicles, and the potential loss of the large poplar at the village entrance. This effect has not been assessed and needs to be considered by the applicant.
- Landscape mitigation - In addition to the landscape proposals drawing and description in the Biodiversity Management Plan, a summary of the enhancement measures should be provided in the LVIA document. This is in order that the focus of the description is based on the mitigation of landscape and visual effects rather than purely biodiversity aims.
- Visual assessment - It is recommended that a set of viewpoint photographs is also included in the LVIA that shows the representative views and 3 additional heritage viewpoints when the vegetation is not in leaf.
- Visual assessment - No visual assessment has been made of the construction stage of the project. The construction stage is predicted to be 14 -16 weeks. The applicant should provide an assessment of impacts during this stage of the development including additional information about the visual impact of the structures which connect with the existing pylons in this section of the LVIA.
- Visual assessment - The visual impact at the construction stage of vehicles bringing the components of the solar farm to the site should be assessed.
- Visual assessment - The applicant should confirm if alternative routes for access to the site have already been ruled out, and if so for what reasons.
- Visual assessment – In year 1 of the development, a major scale of visual effects is recorded for viewpoints 1, 2, 4, 14 and 15 located on existing PRowS, the EMD Team are in agreement with this assessment. These impacts are significant in terms of the EIA regulations.
- Visual assessment – Heritage viewpoint B - The EMD Team is in agreement with the conclusions of the visual assessment for year 1 of the proposed scheme for the 18 representative viewpoints, and heritage viewpoints A and C. However, we are not in agreement with the assessment from Heritage viewpoint B from PRow footpath 209/12/1, looking southwest (Southwell Footpath 11 on the Southwell Heritage trail 2), this point is located on the high ground to the south of Southwell and to the east of the site and there is a distant view of the southern half of the site. We consider the scale of effect for Heritage viewpoint B should be minor adverse for year 1 only.
- Visual assessment - For Year 10 of the visual assessment for some viewpoints, the change in scale of effect from year 1 to year 10 is large, for example for viewpoint 1 the scale of effect at year 1 is Major and this declines to negligible by year 10. This large scale of change relies totally on the successful establishment of the proposed hedgerows and the effective management of the existing hedgerows. The applicant

should reconsider the year 10 impacts and confirm that this degree of change is accurate.

- Visual assessment - A description of the visual effects on surrounding residential properties should be included in the LVIA, particularly on properties on the north western edge of Halloughton, this information should be added either as a Schedule of Effects or as a written description in the LVIA.
- Visual assessment - The extent of views from the isolated farms within the study area should also be recorded, even if the views are screened by surrounding mature vegetation.
- Cumulative effects – the applicant should confirm that there are no cumulative effects with other proposed solar farm projects within the study area, that are registered with the planning authority.

The following information should be provided as a condition of the application should this be approved at a later stage:-

- A detailed landscape proposal drawing with full planting schedules, showing species, specification and density of plant material should be provided.
- Tree protection measures shown in the Arboricultural Impact assessment (Arboricultural Impact Assessment – Barton Hyett Associates – Revision A 26th June 2020) should be conditioned and as detailed in the tree consultants' comments (Tree consultant – Graham Wilson to HW - North Kesteven District Council – 27th July 2020)
- The colour of the various cabins has not been detailed at this stage; this information should be provided as a condition of the application. As the cabins are likely to be viewed against the landscape rather than the skyline, we would suggest that a green or grey brown colour would be the least intrusive.

11 Conclusion

The applicant's submitted information currently has some omissions or is lacking clarity in certain areas identified within this report. Before any final conclusion can be made the applicant should provide the additional information requested and clarify the issues outlined above. Once this information is provided, the EMD Team can then determine if they recommend support for the proposed scheme or not."

Comments on LVIA Addendum 26.01.2021: "1.Introduction

The following comments have been prepared by Helen Jones of Via East Midlands Limited, acting as a landscape consultant to Newark and Sherwood District Council (NSDC). These comments have been formulated on the basis of the additional submitted information detailed below. A site visit was made to the study area and representative viewpoints by Helen Jones on 26th August 2020.

The Environmental Management and Design (EMD) Team have examined the following additional information submitted by the applicant to make these comments (only information that is relevant to Landscape and Visual Impact is listed below) following previous comments provided by the EMD Team on 18th September 2020. These comments follow the sequence of our original comments, information provided

by Pegasus Group is shown in ~~red font~~ (bold text), and additional VIA East Midlands comments and discussion are in ~~blue font~~ (italics).

Documents

- Covering Letter JOW/P18-2917 18th December 2020 to Honor Whitfield NSDC
- Landscape and Visual Impact Assessment addendum – *(including the winter viewpoints)* - Pegasus Group - December 2020 / CR / P18-2917
- Winter photomontages – Pegasus Group – December 2020
- Agricultural Land Classification Report issue 2 – Amet Property – November 2020
- Site access note - JOW P18 2917 - Pegasus Group – December 2020
- Report of an Archaeological Evaluation ref: R14340 prepared by PreConstruct Archaeology – December 2020
- Planting note – Pegasus Group – 21st January 2021 – Caroline Roe
- Site Selection Report – JOW P18 -2917 – Pegasus Group – January 2021

Drawings

- Updated Site Location Plan No. P18-2917_02 Rev E – Pegasus Environment
- Updated Site Layout and Planting Proposals plan No. P18- 2917_12 Rev J. - Pegasus Environment
- Superseded revised site location plan No. P18-2917_02 Rev D – Pegasus Environment
- Superseded revised site layout plan No. P18- 2917_12 Rev H - Pegasus Environment
- Tree Protection Plan – Highways Access No. BHA_665_03
- Swept Path Analysis: Proposed Site Access 15.4m Articulated Vehicle No. P18-2917 FIGURE 2 Rev A
- Proposed Site Access Visibility Splays Plan No. P18-2917 FIGURE 1 Rev A

Comments submitted by other consultees

- Conservation advice – NSDC Oliver Scott – NSDC Honor Whitfield – dated 24th September 2020
- Tree consultant – Graham Wilson North Kesteven District Council to NSDC Honor Whitfield – 18th December 2020
- NCC Rights of Way – NCC Sue Jarczewski to NSDC Honor Whitfield – dated 18th December 2020
- NCC Highways – NCC David Albans to NSDC Honor Whitfield – dated 11th January 2021
- Neighbour or public comments – various dates

Summary of comments of 18th September 2020 provided by Via East Midlands Ltd

- The LVIA has been carried out to the accepted best practice which is the Landscape and Visual Impact Assessment (GLIVA3) Third Edition published by the Landscape Institute and Institute of Environmental Managers and Assessment (April 2013), and the photography practice note – Landscape Institute 2019 Visual Representation of Development Proposals. Technical Guidance Note 06/19, with the exception of the issue noted below concerning the lack of viewpoint photographs when trees and hedgerow are not in leaf.

No response required

- The landscape assessment has referred to national, regional and local landscape character assessments. Only negligible landscape impacts have been identified on the national and regional landscape character types, which is agreed by the EMD Team.

No response required

- A section of the southern part of the proposed site is within the Mid Nottinghamshire Farmlands Landscape Character Area - Policy Zone 39 – Thurgaton Village Farmlands with Ancient woodlands, information about PZ 39 should be added to this section of the LVIA.

Information about MN PZ 39 has now been added into the LVIA document (Paragraphs 3.3 - 3.8 LVIA addendum Pegasus Group - December 2020 / CR / P18-2917)

To summarise the contents of the NSDC Landscape Character Assessment:-

MN PZ 37 has very good landscape condition, and a high landscape sensitivity – approximately 50% of the site area. The policy action is Conserve.

MN PZ 38 has good landscape condition, and a moderate landscape sensitivity – approximately 40% of the site area. The policy action is Conserve and Reinforce.

MN PZ 39 has very good landscape condition, and a high landscape sensitivity – approximately 10% of the site area. The policy action is Conserve.

- The location and size of the temporary construction compound should be clarified by the applicant, as this is shown on the key of the layout drawing but not shown clearly on the drawing itself.

The location and size of the temporary construction compounds is clarified on the updated Site Layout and Planting Proposals plan No. P18- 2917_12 Rev J - Pegasus Environment.

Additional information is also provided in the LVIA addendum in paragraph 3.32, which explains that there are two compounds of size 0.18 ha. One is located in the northern half of the site and is positioned near an existing field boundary and two blocks of woodland, and one is in the southern half adjacent to the substation connection to the grid and would be seen in the context of the existing large scale pylon on the site, and located near two dense blocks of woodland and a length of hedgerow.

The EMD Team consider that this is sufficient information to show that the location of the temporary construction compounds has been properly considered, and no additional information is required.

- The NCC Highway comments indicate that a mature Poplar at the entrance to Halloughton village will need to be removed, the applicant should confirm whether this tree needs to be removed or not.

This issue had been clarified in the submitted information, and the mature Poplar Tree was to be retained as confirmed on the Tree Protection Plan – Highways Access No. BHA_665_03 – Barton Hyett Arboricultural Consultants – December 2020.

However, an application has been made to NCC Highways Development Control by the Via East Midlands Senior Forestry Officer to fell the tree in respect of its safety and this application is due to be approved. (NCC Highways – NCC David Albans to NSDC Honor Whitfield – dated 11th January 2021). This is a separate application and does not form part of any contract for advanced works for the solar farm.

- Landscape impact - The EMD Team do not agree with the assessment that there is a minor beneficial change in landcover throughout the site. This assessment has focussed on the biodiversity aspects of the change and not on the perception of the change in the landscape. The applicant should review and revise this assessment to encompass perceived change as part of the overall evaluation and provide an updated revision on this issue.

The landscape impact on the elements of the site is covered in Paragraphs 3.9 and 3.10 (LVIA addendum Pegasus Group - December 2020 / CR / P18-2917)

The previous assessments by the applicant are summarised as follows:-

Topography – negligible scale of effect – this is agreed by the EMD Team because there are no changes to topography as a result of the proposed works. Hedgerows and Trees – minor-moderate scale of effect – this is agreed by the EMD Team because there is no major removal of trees and hedgerows required as a result of the proposed works.

Landcover – this was assessed by the applicant as having low value and low susceptibility which leads to a low sensitivity. The applicant says the magnitude of change is high but that this is offset by biodiversity inputs. The EMD Team do not agree that a low sensitivity x high magnitude of change leads to a minor beneficial effect and asked the applicant to reassess this, which they did. The applicant now accepts that there is a moderate adverse scale of effect on landcover as opposed to a minor beneficial impact, during the 40 year lifetime of the scheme.

Paragraph 3.10 of the LVIA addendum reads as follows:-

‘The assessment of land cover has been revised to focus on the perception of change to the landscape, rather than the biodiversity benefits provided by the proposed species rich meadow grassland around the field margins. The Magnitude of Change is assessed as High, which, when combined with a Low Sensitivity, results in a Moderate Adverse Scale of Effect. The High

Magnitude is a reflection of the introduction of the built elements (principally the solar panels), which would obscure views of areas of the grassland beneath the panels. However, the Proposed Development can be described as long term in nature but temporary, allowing the land to be effectively returned to its previous condition and use following decommissioning.'

Effect on the landscape character of the policy zones

Paragraph 3.13 of the LVIA addendum reads as follows:-

'It is considered that the Proposed Development would bring forward landscape enhancements such as lengths of new hedgerows and infilling of field boundaries, which would undoubtedly strengthen the landscape framework across the Site. The proposals would introduce built form into an area which currently contains a high proportion of agricultural fields. The Magnitude of Change is therefore assessed as High, which translates into Major Effects upon Policy Zones 37,38, and 39. However, it should be noted that these effects would diminish to Negligible rapidly beyond the boundaries of the Site, as a result of the combination of intervening landform and well-established vegetation across the surrounding landscape.'

In summary, there would be a major adverse scale of effect on Policy Zones 37,38 and 39 for the 40 year lifetime of scheme. It is accepted that these impacts are localised to the site area and will diminish rapidly with distance for the proposed site, but nevertheless a substantial change to the landscape character of these policy zones within the site area is accepted by the applicant.

The construction impact on the landscape character of the policy zones

Paragraph 3.15 of the LVIA addendum reads as follows:-

'The nature of the construction works would introduce movement, temporary structures, facilities and a change of land use; however changes to the landscape character would be localised. It is expected that the short term, localised, construction and decommissioning period would cause a Medium Magnitude of Change to the defining characteristics of the Policy Zones 37,38 and 39.

The applicant does not spell out the scale of effect at the construction stage on the character of the landscape policy zones. If this is extrapolated from the information above – a medium magnitude of change x a moderate to high sensitivity site (if the NSDC Landscape character assessment sensitivity is used) would lead to at least a medium to high adverse scale of effect on the policy zones at the construction stage. It is accepted that these impacts are localised to the site area and will diminish rapidly with distance for the proposed site, but nevertheless a substantial change to the landscape character of these policy zones within the site area can be extrapolated from the information provided.

- Landscape impact - There will be a change in the perception of the landscape character of the village of Halloughton at the construction stage due to the

presence of the access road emerging on to Bridle Farm Lane, the main route into the village, caused primarily by visual presence of construction vehicles, and the potential loss of the large poplar at the village entrance. This effect has not been assessed and needs to be considered by the applicant.

Construction impact on the village of Halloughton

The following comments have been made by the applicant in relation to the change in the perception of the landscape character of the village of Halloughton at the construction stage due to the presence of the access road and primarily by visual presence of construction vehicles in paragraph 3.18 of the LVIA addendum.

'The perceived landscape character of the village varies depending on which area of the village you are experiencing it from. Whilst the western and central portions of the village could be described as relatively tranquil with some intervisibility between the village and the adjacent landscape, experienced from locations such as the PRoW bridleway to the south of the village which passes through Bridle Road Farm. The eastern edge of the village has a different character, it feels more enclosed and less tranquil due to the presence of the A612 Highcross Hill. A612 Highcross Hill is a busy route that travels through Southwell, and as observed on the Site visit carries a variety of vehicles including lorries and local buses. Construction vehicles traveling from the A612 Highcross Hill will have to travel along approximately 37m of Bridle Farm Road before they turn into the proposed Site access. The introduction of these vehicles at the frequency detailed in the Construction Traffic Management Plan, which accompanies the application, are expected to bring about a Medium Magnitude of Change to the perceptible landscape character of the village of Halloughton. However, changes to the landscape character would be localised.'

A medium adverse magnitude of change is identified above, but the overall scale of visual effect of the construction stage on the eastern end of the village of Halloughton is not fully described . The applicant should provide more detailed information in this respect and confirm the scale of effect at the construction stage.

- In addition to the landscape proposals drawing and description in the Biodiversity Management Plan, a summary of the enhancement measures should be provided in the LVIA document. This is in order that the focus of the description is based on the mitigation of landscape and visual effects rather than purely biodiversity aims.

The following summary is provided in the LVIA addendum in Paragraph 3.19

- **'Hedgerow field boundaries internally and around the periphery of the Site would be retained, and where necessary infilled with native species to enhance and strengthen the local landscape character.**

- Trees within the Site along field boundaries would be retained and protected to provide structure to the landscape and, to help in filtering views from publically accessible locations across the wider landscape.
- A 15m wide belt of native trees will be implemented ahead of time this winter 2020 / spring 2021 along part of the Sites southern boundary to help to filter and restrict views from locations to the south of the Site, including the residential properties on the northern edge of Halloughton.
- A new native hedgerow with trees is proposed along the part of the far western extent of the southern boundary of the Site, to help mitigate any potential views from locations to the south-southwest of the Site including residential properties, road and PRow users in and around the village of Halloughton.
- The existing boundary vegetation situated adjacent to the route of Southwell Bridleway Number 74 is to be retained and infilled, with a new length of hedgerow proposed where it crosses the central portion of the Site, to help in softening the appearance of the proposed built form.
- Internal access tracks have been designed to utilise existing gateways and farm tracks wherever possible to minimise the need for localised hedgerow removal.
- The battery units within the Site are located on the periphery of the fields to benefit from a level of screening provided by existing field boundary vegetation to minimise visual impact.
- The sub-station and one of temporary construction compounds would be seen in the context of an existing large scale pylon on the Site, and located near two dense blocks of woodland and a length of hedgerow. The second temporary construction compound would be located in the northern parcel of the Site, near an existing field boundary and two well established blocks of woodland. These locations have been carefully considered to benefit from screening provide by existing vegetation to aid in restricting views of the proposals from locations across the surrounding landscape. The temporary construction compounds would each be approximately 0.18 hectares in size.'

This additional information is accepted by the EMD Team and forms a useful summary of the landscape enhancements to be provided within the LVIA addendum itself rather than in another document.

More information is provided in the recently submitted planting note (Pegasus Group – 21st January 2021 – Caroline Roe. The note describes proposals for advance planting works which will provide additional screening to the northern edge of Halloughton village. These consist of the following planting areas:-

- 'Main new woodland planting adjacent to the southern edge of the Application Site of 14m width, plus a section of 10m width at its eastern extent.
- An additional strip of evergreen and copper beech trees adjacent to the southeastern corner of the Application Site. Note that copper beech trees are planted to reflect this species in the village, including church yard.

- **A strip of planting adjacent to the south-west corner of the Application Site to be undertaken in advance of commencement of the solar farm development (subject to planning permission being granted).'**

A drawing (Screening and Shelterbelt planting plan) and photographs of the completed planting have been provided within this document. However, it must be stated that the proposed scheme has not yet been granted planning approval, to carry out the woodland and evergreen advance planting seems somewhat premature, but this is an issue to be discussed with the NSDC Planning Policy Team.

Visual Assessment

- Visual assessment - It is recommended that a set of viewpoint photographs is also included in the LVIA that shows the representative views and 3 additional heritage viewpoints when the vegetation is not in leaf.
These viewpoint photographs have been provided as requested, as well as the 4 no photomontages. These are accepted by the EMD Team.
- Visual assessment - No visual assessment has been made of the construction stage of the project. The construction stage is predicted to be 14 -16 weeks. The applicant should provide an assessment of impacts during this stage of the development including additional information about the visual impact of the structures which connect with the existing pylons in this section of the LVIA.
This information is provided in the Visual Assessment Summary - Appendix 2 of the LVIA addendum document, this assessment is accepted by the EMD Team.
This shows a major adverse scale of visual effect for Viewpoints 1, 2, 3, 4, 12, 14 and 15. These are significant effects for 7 out of the 18 viewpoints at the construction stage.
- Visual assessment - The visual impact at the construction stage of vehicles bringing the components of the solar farm to the site should be assessed.
This information is also provided in the Visual Assessment Summary - Appendix 2 of the LVIA addendum document, this assessment is accepted by the EMD Team.
As above this shows major adverse scale of visual effect for Viewpoints 1, 2, 3, 4, 12, 14 and 15, but none of these are located near the site access.
For the viewpoints closest to the site access, the following visual impacts are assessed:-
VP 7 – negligible scale of visual effect
VP 8 – moderate adverse scale of visual effect
VP 9 – minor adverse scale of visual effect
There are therefore visual effects for construction traffic on the access route, in the village of Halloughton which had not been reported previously.
- Visual assessment - The applicant should confirm if alternative routes for access to the site have already been ruled out, and if so for what reasons.

The most detailed Information is included in the Highways Note (JOW P18 2917 - Pegasus Group – December 2020)

‘3.1 The access has been selected as the most preferable option for the Proposed Development. It has been proven to be safe in highways terms, providing adequate visibility, can be provided without significant works or alterations being required and is not within a built up area.

3.2 Two alternative locations for the access to the site were considered and discounted:

- 1) The main farm entrance further to the west of the proposed access was not considered preferable to the proposed access due to its location within the built up area of Halloughton, meaning construction vehicles would be required to enter the village and potentially cause disruption to residents.**
- 2) Access via Stubbins Lane, to the north-east of the proposed access, was discounted due to the requirement for significant loss of trees within the thick belt of existing trees on the western side of this road and highway effects. This access option would also have caused disruption to residents living along Stubbins Lane, which is a narrow lane.’**

The EMD Team agree that neither of these above options are preferable to the access chosen, due to the impact on the visual amenity of the residents of Halloughton village, and also the loss of vegetation on western side of the A612 as above. The second option would also involve substantial loss of mature hedgerow to Stubbins Lane, as well as additional impact on the entrances to Brackenhurst College. Although in terms of vegetation loss the option chosen is the preferable option, it still alters the visual perception of the eastern end of the village of Halloughton close to listed buildings such as the Grade II listed church of St James, Halloughton. The conservation comments (Conservation advice – NSDC Oliver Scott – NSDC Honor Whitfield – dated 24th September 2020) should be referred to for more detail about the impact on listed buildings.

- Visual assessment – In year 1 of the development, a major scale of visual effects is recorded for viewpoints 1, 2, 4, 14 and 15 located on existing PRoWs, the EMD Team are in agreement with this assessment. These impacts are significant in terms of the EIA regulations.
No additional information required, the information is now tabulated in the Visual Assessment Summary - Appendix 2 of the LVIA addendum document.
- Visual assessment – Heritage viewpoint B - The EMD Team is in agreement with the conclusions of the visual assessment for year 1 of the proposed scheme for the 18 representative viewpoints, and heritage viewpoints A and C. However, we are not in agreement with the assessment from Heritage viewpoint B from PRoW footpath 209/12/1, looking southwest (Southwell Footpath 11 on the Southwell Heritage trail 2), this point is located on the high ground to the south

of Southwell and to the east of the site and there is a distant view of the southern half of the site. We consider the scale of effect for Heritage viewpoint B should be minor adverse for year 1 only.

The applicant has reconsidered the schedule of effects summary provided by Via EM in the comments and has made some amendments as provided as Appendix 2 of the LVIA addendum document.

For year 1 they have identified a range between a moderate to negligible scale of effect, with a negligible scale of effect in year 10. EDM Team still consider that there is a minor scale of visual effect which is within this range, therefore this amendment is accepted.

- Visual assessment - For Year 10 of the visual assessment for some viewpoints, the change in scale of effect from year 1 to year 10 is large, for example for viewpoint 1 the scale of effect at year 1 is Major and this declines to negligible by year 10. This large scale of change relies totally on the successful establishment of the proposed hedgerows and the effective management of the existing hedgerows. The applicant should reconsider the year 10 impacts and confirm that this degree of change is accurate.

The applicant has reconsidered the schedule of effects summary provided by the EMD Team in their comments and has made some amendments, this is provided as Appendix 2 in the LVIA addendum documents.

In summary, VPs 4 and 14 have a major adverse scale of effect reducing to a range between moderate to negligible in year 10 which remains unchanged and is accepted by the EMD Team. The Year 10 scale of effects for VP 1, 2 and 3 (which have a major adverse scale of effects in year 1) have been amended to show a moderate adverse scale effect at year 10. This reduces the large range between the scale of effects at Year 1 and Year 10, and these amendments are accepted by the EMD Team

- Visual assessment - A description of the visual effects on surrounding residential properties should be included in the LVIA, particularly on properties on the north western edge of Halloughton, this information should be added either as a Schedule of Effects or as a written description in the LVIA.

Paragraph 3.24 and 3.25 of the LVIA addendum reads as follows:-

‘For the occupants of residential properties in Halloughton, the Susceptibility to change arising from the Proposed Development is considered to be High. This is based on the assumption that views of the surrounding countryside are an important component of the visual amenity associated with these properties. With Medium Value being an attractive but un-designated landscape, this results in High Sensitivity for residential receptors.’

Agree

‘For residents of the properties on the northern edge of the village, closest to the Site. It is anticipated that the new tree belt and hedgerows in combination with the existing field boundary vegetation along the Site’s southern boundary, which is to be infilled and strengthened as part of the

proposals. The layers of existing tree groups on Site, vegetation in the gardens of the properties, and in places agricultural buildings are expected to restrict views of the Proposed Development from the lower floor windows and gardens of the properties. Partial views may be experienced from the upper floor windows of the properties during the construction phase and Year 1 resulting in a Low Magnitude of Change and Moderate *adverse* Scale of Effect. By Year 10, following the successful establishment of the proposed vegetation the Magnitude of Change is expected to reduce to Negligible.'

This issue has been addressed by a written description on the LVIA addendum. At year 1 and in the construction phase there is a moderate adverse scale of effect from upper floor windows of some properties on the northern edge of Halloughton, it is still not clear which particular properties this impact applies to, or how many and the applicant should provide more detailed information on this issue.

The LVIA addendum in paragraphs 4.3 comments on the lack of inter-visibility between the representative viewpoints close to Halloughton (VPs 7,8,9,10,11 and 12) and the Conservation Area. However, in order to reach the village by Southwell Bridleway 74 and Halloughton Byway 9 for example the visitor passes through the surrounding landscape before entering the village and this experience will be altered by the substantial change in the surroundings on the approach to the village.

- Visual assessment - The extent of views from the isolated farms within the study area should also be recorded, even if the views are screened by surrounding mature vegetation.

This has been addressed by a written description in the LVIA addendum in paragraphs 3.26 – 3.30

3.26 Residents of the local farms scattered across the local landscape including New Radley Farm, Stubbins Farm, Halloughton Wood Farm and Thorney Abbey Farm are also assessed as being of High Sensitivity to the Proposed Development.

Agree

3.27 New Radley Farm is located in the northern extent of the Site, although it sits outside of the Site boundary. The farmhouse is surrounded by dense woodland to the north, east and south and hedgerow vegetation to the west. As a result, it is anticipated that residents of New Radley Farm would have the opportunity to experience partial views of the construction activities taking place to the west of the property, resulting in a Low Magnitude of Change. Partial views of the operational solar development may also be possible from any upper floor windows that face in a westerly orientation, resulting in a Low Magnitude of Change and Moderate Scale of Effect at both Year 1 and 10. Although it must be emphasised that because the farm is private, this assumption has been made using aerial mapping and observations during the Site visit. As the residents approach the property

along the driveway to the north, it is anticipated that views of the construction activities and the proposals at Year 1 could be available. By Year 10 once the hedgerow along the eastern edge of the driveway has established, the Magnitude of Change and Scale of Effect are expected to diminish. It should be noted that New Radley Farm is owned by the same landowner who owns the land which will accommodate the Proposed Development.

3.28 Stubbins Farm and Stubbins Barn are located just to the north of Viewpoint 4, set back by approximately 70m and set within a mature garden which includes a number of large shrubs. For residents it is anticipated that field boundary vegetation along the Site's boundary, which is to be infilled and strengthened as part of the proposals, and vegetation in the garden of the properties is expected to restrict views of the Proposed Development from the lower floors. Partial and filtered views may be experienced from the upper floor windows of the construction activities and proposals at Year 1 resulting in a Low Magnitude of Change Moderate Scale of Effect. Although it must be emphasised that because the farm is private, this assumption has been made off aerial mapping and observations during the Site visit. By Year 10 once the proposed vegetation along the Site's boundaries matures the Magnitude of Change and Scale of Effect will reduce.

3.29 Halloughton Wood Farm is located approximately 600m to the southwest of the Site. Intervening vegetation which includes a dense mature hedgerow alongside Cotmoor Lane Byway to the east, Halloughton Wood to the north and vegetation around the periphery of the farmyard. This vegetation in combination with the large agricultural barns within the farmyard are expected to prevent views of the construction phase or operational solar development.

3.30 Thorney Abbey Farm is located on the B6386 to the north of the Site. From a study of aerial mapping, it appears that the residential property is located to the eastern end of the farmyard and surrounded by dense vegetation including several mature trees. Thorney Abbey Farm is not located in an elevated position and, as a result, the layers of intervening field boundary vegetation, including along the Site northern boundary would heavily filter and restrict views of the proposals. This would result in a Negligible Magnitude of Change and subsequent Scale of Effect during the construction phase and Year 1 and 10.

A summary of the information provided by the applicant is :-

New Radley Farm – a moderate adverse scale of visual effect from upper levels of the property - at the construction stage, year 1 and year 10 is identified. The effects will diminish by year 10 with establishment of hedgerow along the eastern edge of the driveway. This is accepted by the EMD Team. It is noted that New Radley Farm is owned by the same landowner who owns the land which will accommodate the Proposed Development.

Stubbins Farm – a moderate adverse scale of visual effect from upper levels of the property at the construction stage and Year 1 is identified. The effects will diminish by Year 10 once the proposed vegetation along the Site's boundaries matures. This is accepted by the EMD Team.

Halloughton Wood Farm – negligible visual effect - This is accepted by the EMD Team.

Thorney Abbey Farm – negligible visual effect - This is accepted by the EMD Team.

- Cumulative effects – the applicant should confirm that there are no cumulative effects with other proposed solar farm projects within the study area, that are registered with the planning authority.

It has been confirmed by the applicant that there are no proposed solar farm developments registered with the local authority that fall within the study area, and this information is accepted by the EMD Team.

Conclusion

Pegasus Group have provided most of the additional information requested in the EMD comments of 18th September, this draws out the full landscape and visual impacts of the scheme. Items where further information is still required are:-

- The applicant should confirm which properties the moderate scale of visual impact described on the northern edge of Halloughton applies to, at the very least the number of properties affected should be detailed.
- A medium adverse magnitude of change due to the construction stage of the project on the village of Halloughton is described, but the overall scale of visual effect of the construction stage on the eastern end of the village of Halloughton is not fully detailed, this information should be provided by the applicant.

Discussion of Landscape impacts

A moderate adverse landscape impact on landcover of the proposed site for the 40 year lifetime of the scheme – rather than a minor beneficial impact as previously stated when the assessment was biodiversity focussed is described.

A major adverse scale of effects on the character of Policy Zones 37.38 and 39 for the 40 year lifetime of scheme is also described.

The impact of the proposed scheme on the setting of Halloughton Conservation Area and the listed buildings contained within this is covered in detail in the response of Oliver Scott (Conservation advice – NSDC Oliver Scott – NSDC Honor Whitfield – dated 24th September 2020) and is assessed as 'less than substantial harm' but harm on the setting has been identified by the heritage specialist. The EMD team would reiterate his comments and agree with the designation statement for Halloughton from 1972 which says "In fact it could be said that the visual quality of Halloughton is attributable more to its landscape, than to its buildings" (Notts County Council, 1972). In order to reach the village by Southwell Bridleway 74 and Halloughton Byway 9 for example,

the visitor passes through the surrounding landscape before entering the village and this experience will be altered by the substantial change in these surroundings.

Taking the above into account the EMD Team consider that there are long term impacts on the 'land cover' element of the landscape, and long term impacts on the landscape character of the site area, it is accepted that these impacts will diminish with distance from the site. Harm has been identified to the setting of Halloughton Conservation Area and the listed buildings contained within this.

Discussion of Visual Impacts

The following scale of visual effects had been identified:-

A moderate adverse scale of effects on views from upper levels of some properties on the northern edge of Halloughton (the number of properties and which properties are affected is not detailed)

A major scale of visual effect on PRoW Southwell 74 represented by VP 1 , and 2 at the construction stage and years 1 and 10 has been identified

A major scale of visual effect on PRoW Southwell 74 represented by VP 3 at the construction stage and moderate scale of visual effect at year 10

A major scale of visual effect on PRoW Southwell 74 represented by VP 4 at the construction stage and year 1, and moderate – negligible at year 10,

A major scale of visual effect on PRoW Southwell 43 represented by VP 14 at Years 1 and moderate – negligible at year 10

A major scale of visual effect on PRoW Southwell 43 represented by VP 15 at the construction stage years 1 and 10.

A moderate adverse scale of visual effect on New Radley Farm and Stubbins Farm at year 1 in views from upper levels of the properties which will reduce by year 10.

Taking the above into account the EMD Team consider that there are long term impacts on PRoW Southwell 74 particularly for the viewpoints 1 and 2 which last at least until year 10 and probably longer, and long term impacts on PRoW Southwell 43 for the viewpoints 14 and 15 which continue at year 10. These footpaths are well used particularly PRoW Southwell 74 which links Southwell and Halloughton. The visual amenity of these routes will be reduced as views will change from open farmland to views of solar farm infrastructure including the surrounding protective fencing and as described above this will affect the visual perception of the village of Halloughton.

Summary

Due to both the Landscape and Visual Impacts identified by the applicant, the EMD Team do not support the proposals for the construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure. The EMD Team recognise the need for the provision of solar farms to achieve renewable energy targets but consider that this location close to the northern edge of the village of Halloughton is not an appropriate setting due to these identified

landscape and visual impacts. These impacts should be weighed in the planning balance when considering if the proposed scheme should go ahead.

Comments on Amended Plans 12.02.2021: “The Environmental Management and Design (EMD) Team have examined the following additional information submitted by the applicant to make these comments (following previous comments provided by the EMD Team on 18th September 2020, and on 26th January 2021.

- Drawing P18-2917 Revision L – Site Layout – Pegasus Group
- Letter – James Walker – Associate Planner - Pegasus Group to Honor Whitfield NSDC – dated 2nd February 2021

The above documents provide additional information and describe amendments that have been made to the site layout drawing following the meeting between Honor Whitfield NSDC, Oliver Scott NSDC, Helen Jones Via EM, and representatives of Pegasus Group on 29th January 2021. These amendments are as follows:-

- The removal of an area of proposed panels from land closest to Halloughton village and the Halloughton Conservation Area, at the southern end of the easternmost field of the Application Site.
- The removal of an area of proposed panels from a field in the central section of the Application Site, south and east of PRow Southwell Bridleway 74.

The planting proposals have been amended as follows:-

- The removal of proposed hedgerow along the southern edge of PRow Southwell Bridleway 74.
- The planting of new native hedgerow along the new southern edge of the panels in the easternmost field and along the northern edge of the access track to further establish separation between the Proposed Development and Halloughton village.
- The reinforcement of existing trees and hedgerows along the northern boundary of the southern parcel, including planting of semi mature trees.
- The reinforcement of hedgerow along western boundary of Application Site, adjacent to PRow Southwell Footpath 42, including planting of native trees.

Discussion of the change in visual effects as a result of the above amendments

The main changes put forward by the applicant as a result of the above amendments are a reduction in the visual effects of the proposed development on:-

Viewpoint 1 - view from PRow Bridleway Southwell 74 looking east

Viewpoint 2 - view from PRow Bridleway Southwell 74 looking west

Viewpoint 3 - view from PRow Bridleway Southwell 74 looking west

Viewpoint 4 - view from PRow Bridleway Southwell 74 looking west

These changes are illustrated in Appendix 1: Updated visual assessment Viewpoints 1-5, of the letter from Pegasus to NSDC dated 2nd February.

The EMD Team accept that the removal of the area of panels in the central area of the Proposed Development adjacent to PRoW Bridleway Southwell 74, will reduce the magnitude of change at the construction stage and Year 1 of the Proposed Development on the above viewpoints. This reduction will mean that the impacts are now less than the major adverse visual impacts previously identified, we agree that these are now on a scale of effect between major and moderate adverse. The Pegasus Group conclusions are shown in ~~red font~~ [bold text] below, and the EDM Team comments in ~~blue font~~ [italics] below.

To summarise, the most important visual effects which have been identified are:-

- A major scale of visual effect on PRoW Southwell 74 represented by VP 1, and 2 at the construction stage and year 1, **reduced to a moderate scale of effect at construction stage and year 1, and a negligible effect by year 10.** *The EMD Team accept that visual effects are reduced to a range between a major to moderate scale of effect at the construction stage and Year 1. The scale of effect will be less than previously assessed moderate adverse at year 10, but this depends on the success of vegetation establishment.*
- A major scale of visual effect on PRoW Southwell 74 represented by VP 3 at the construction stage and moderate scale of visual effect at year 1 and year 10, **reduced to moderate scale of effect at construction stage and to negligible by year 1 and 10.** *The EMD Team accept that visual effects are reduced to a range between major to moderate scale of effect at the construction stage. The scale of effect will be less than previously assessed moderate adverse at years 1 and 10, but this depends on success of vegetation establishment.*
- A major scale of visual effect on PRoW Southwell 74 represented by VP 4 at the construction stage and year 1, and a range between moderate to negligible at year 10, **reduced to major to moderate at the construction stage and year 1, and moderate - negligible by year 10.** *The EMD Team accept that visual effects are reduced to a range between major to moderate scale of effect at the construction stage and Year 1. It is also agreed that the scale of effect at year 10 will be in a range between moderate adverse and negligible, but this depends on success of vegetation establishment.*
- A major scale of visual effect on PRoW Southwell 43 represented by VP 14 at Years 1 and moderate – negligible at year 10. **Remains unchanged.**
- A major scale of visual effect on PRoW Southwell 43 represented by VP 15 at the construction stage years 1 and 10. **Remains unchanged.**
- A moderate adverse scale of visual effect on New Radley Farm and Stubbins Farm at year 1 in views from upper levels of the properties which will reduce by year 10. **Remains unchanged.**
- A moderate scale of effect on a limited number of properties (see below) on the northern edge of Halloughton in the construction stage and at Year 1.

Taking the above into account the EMD Team still consider that there are long term impacts on PRoW Southwell 74 particularly for the viewpoints 1 and 2 which last until year 1 and dependant on the success of vegetation establishment probably longer. The visual

effects are reduced by the removal of the relatively small field of panels, but they are still important.

There are long term impacts on PRow Southwell 43 for viewpoints 14 and 15 which continue at year 10 and these still continue to be major adverse.

As mentioned in the previous comments, the visual amenity of these routes will be altered as views will change from open farmland to views of the solar farm infrastructure including the surrounding protective fencing and as described above this will affect the visual perception of the village of Halloughton when approaching it on foot using the surrounding PRowS.

Landscape Impact Summary

To summarise the Landscape impacts as detailed in the previous comments

- A moderate adverse landscape impact on landcover of the proposed site for the 40-year lifetime of the scheme. **Remains unchanged.**
- A major adverse scale of effects on the character of Policy Zones 37, 38 and 39 for the 40 year lifetime of scheme is also described. **Remains unchanged.**

Taking the above into account the EMD Team still consider that there are long term impacts on the 'land cover' element of the landscape, and long term impacts on the landscape character of the site area, it is accepted that these impacts will diminish with distance from the site. Harm has been identified to the setting of Halloughton Conservation Area and the listed buildings contained within the area, in the comments of Oliver Scott NSDC.

Additional information provided

- The applicant should confirm which properties the moderate scale of visual impact described on the northern edge of Halloughton applies to, at the very least the number of properties affected should be detailed.

The applicant has now provided information which shows potentially two properties where views would be theoretically possible – Manor Farm and a property at the westernmost end of the village, and up to 10 properties where any potential views are likely to be filtered by boundary vegetation.

- A medium adverse magnitude of change due to the construction stage of the project on the village of Halloughton is described, but the overall scale of visual effect of the construction stage on the eastern end of the village of Halloughton is not fully detailed, this information should be provided by the applicant.

The applicant has now provided information which shows a Moderate Adverse visual effect on the landscape character of the village of Halloughton at the construction stage. It is accepted that the places where this view will be obtained will be limited and that the removal of panels from the easternmost field of the Proposed Development will reduce visual effects on the churchyard at the Church of St James.

Summary

The EMD Team welcome the reduction in area of panels shown on drawing reference P18-2917 Revision L and the additional and amended planting shown, and accept that this will lead to the reduction in visual impact on viewpoints 1,2,3 and 4. The additional information provided about the outstanding questions above is also useful in order to clarify landscape and visual impacts on Halloughton village. However, due to both the Landscape and Visual Impacts identified by the applicant, the EMD Team still do not support the proposals for the construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure."

LCC Archaeology – 5.8.20 – "The application is accompanied by a desk-based assessment (DBA) which forms a good base-line for the known heritage around the site. A geophysical survey has also been undertaken which recorded predominantly agricultural features, but also a potential enclosure and burning that may relate to a kiln.

The DBA concludes that there is little evidence for anything of archaeological/heritage significance within the site area.

I also note the comments from the Southwell Community Archaeology Group which supplied the applicant with a LiDAR survey of the site which showed potential archaeology within the site boundary, however this data has not been considered in the DBA or the geophysical survey which did not pick up these features.

Consequently, I have concerns that the current level of archaeological investigation has not been sufficient to identify either way the presence or absence of archaeology on the site, although it does form a good start.

With regard to the low potential identified in the DBA, I would suggest that the limited level of archaeological information held in the HER for the area more likely reflects a lack of archaeological fieldwork in the past, rather than a lack of past activity.

Although geophysical survey (magnetometry) is a useful evaluation tool, it does have limitations primarily relating to the depth to which the sensors can penetrate the ground and its reliance on the magnetic variation between the fills within features and natural geology, which tends to be low for many prehistoric sites. This can give misleading results and consequently the current guidance on archaeological evaluation is that geophysical survey should be used in conjunction with targeted trial trench evaluation in order to confirm the survey results and determine the presence, absence, significance, depth and character of any archaeology.

Finally, the site is of considerable size and located in an area favourable to past human settlement activity. While I accept that more recently it has been used for agricultural purposes, it would be contrary to the usual trends in the local area and regionally if more significant archaeology was not present somewhere within a site of this size. I therefore have concerns that the geophysical survey has not been as successful as indicated and the DBA has not been able to consider the full potential of the site.

Recommendation:

Given the above, there is insufficient site specific information at present with which to make any reliable observation regarding the impact of this development upon any archaeological remains. I recommend that further information is required from the applicant in the form of an archaeological evaluation to be considered alongside the application. This evaluation should provide the local planning authority with sufficient information to enable it to make a reasoned decision on this planning application. This evaluation should consist of trial excavation.

'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publically accessible.' Policy 199 National Planning Policy Framework (2019)'.
Please ask the developer to contact this office to discuss the evaluation requirements."

14.08.20 – "Thanks for coming back to me on this and addressing the issues raised with the LiDAR data. The data was looked at for the group by Dr Chris Brooke at Nottingham University who specialises and lectures in ground-based and remote sensing in archaeology. I still share his concerns that the surveys have not adequately identified features pre-dating the post-medieval period and the interpretation you've kindly provided would seem to further this. He pointed out that absence of evidence should not be interpreted as evidence of absence, especially where non-intrusive survey is concerned.

It would be highly unusual for this large area of the Nottinghamshire countryside to be devoid of earlier archaeological remains and as such I think it is reasonable to question the results of the information provided to date and ask for them to be tested at this stage to establish their validity.

The BGS holds no data for the superficial geology on the site, rather than there being no superficial geology at all, and I remain concerned that the geophysics results are more in keeping with the presence of masking deposits obscuring earlier features rather than a lack of activity in the area.

Furthermore, the current guidance on geophysics as an evaluation tool (EAC Guidelines of the Use of Geophysics in Archaeology) is very clear on the limitations of magnetometer surveys and states that 'Where decisions have to be made in the absence of geophysical anomalies an additional evaluation procedure – for instance the use of a different geophysical technique, or trial trenching – should be considered'.

I also reject the 'minimal impact' argument on archaeological remains for solar farms. The impact of 106 hectares of piling foundations, cable runs and substations will be substantial during construction. I am also concerned that the impact during decommissioning in 30 years' time is likely to be greater. Archaeological mitigation of both phases is very difficult, especially as piling does not allow for monitoring as a form of mitigation to ensure the recording of any destruction of surviving archaeological remains. It is therefore vital to establish early on the presence or absence of archaeological remains.

As such, further investigation is still required in the interests of determining a full and accurate assessment of the presence, absence, significance, depth and character of any archaeology

which could be impacted by the proposed development. Trenching will also help inform the appropriateness of the proposed array layout plan in relation to surviving archaeology and help inform an appropriate mitigation strategy that could be secured by condition later on if consent is granted.

Although the information you've provided so far is a very good start to this process, it has not yet established the information required so that an informed planning recommendation can be made."

Comments on Amended Plans: "A very limited archaeological evaluation has taken place prior to determination and the report for this has been submitted with the amendments.

My initial advice to the applicant's archaeological consultant was that they should evaluate the whole site in one go prior to determination, however given the initial survey results, size of the site and relative costs involved it was agreed at the applicant's request that limited trenching prior to determination would be followed by a programme of more intensive evaluation post determination if consent is granted. This has also been communicated to the archaeological consultant on site and I am therefore surprised that the applicant has stated that no further archaeological work is required.

The results of the initial evaluation broadly correspond with the geophysical survey, however features have been identified that were not recorded in the survey and pottery dating to the Iron Age and Romano-British periods were recovered.

One of the main concepts in archaeology is that 'absence of evidence is not evidence of absence' especially when the evaluation sample is such a small percentage of the site, and further evaluation and potential mitigation is still required for the rest of the site.

While I strongly advised that this should have been done prior to determination, not only to protect the archaeological resource, but to allow the applicant to assess the viability of the site based on any future mitigation required, however I am happy to recommend that the remaining work be undertaken as a condition of consent if granted. I believe that this is more than reasonable under the circumstances and has already brought a high degree of compromise in respect of accommodating the applicant's wishes in respect of initial outlay for archaeological investigation.

I would expect at least a total of 3% of the whole redline boundary to be evaluated, minus the trenches already excavated. This is industry standard and a common approach for sites of this size.

Recommendation

If permission is granted I recommend there be an archaeological condition for a mitigation strategy to effectively deal with the rest of this site. This will include, but may not be limited to, a trial trench evaluation of the site which should aim to

determine the presence, absence, significance, depth and character of any archaeological remains which could be impacted by the proposed development as noted above. Further archaeological mitigation work may be required if archaeological remains are identified in the evaluation.

This is in accordance with National Planning Policy Framework paragraphs 189 and 199.

This should be secured by appropriate condition to enable any remaining archaeology which currently survives on this site to be properly assessed and characterised and to allow for an informed archaeological mitigation strategy to be implemented.

The following condition wording is based on current guidance from the Association of Local Government Archaeological Officers and the Lincolnshire Handbook (2019):

Part 1

No development shall take place until an archaeological Written Scheme of Investigation has been submitted to and approved in writing by the Local Planning Authority. This scheme shall include the following:

- 1. An assessment of significance and proposed mitigation strategy (i.e. preservation by record, preservation in situ or a mix of these elements).*
- 2. A methodology and timetable of site investigation and recording;*
- 3. Provision for site analysis;*
- 4. Provision for publication and dissemination of analysis and records;*
- 5. Provision for archive deposition; and*
- 6. Nomination of a competent person/organisation to undertake the work*

The scheme of archaeological investigation must only be undertaken in accordance with the approved details.

Reason: To ensure the preparation and implementation of an appropriate scheme of archaeological mitigation in accordance with the National Planning Policy Framework.

Part 2

The archaeological site work must be undertaken only in full accordance with the approved Written Scheme of Investigation. The applicant shall notify the Local Planning Authority of the intention to commence at least fourteen days before the start of archaeological work in order to facilitate adequate monitoring arrangements. No variation to the methods and procedures set out in the approved Written Scheme of Investigation shall take place without the prior consent of the Local Planning Authority.

Reason: To ensure satisfactory arrangements are made for the recording of possible archaeological remains in accordance with the National Planning Policy Framework.

Part 3

A report of the archaeologist's findings shall be submitted to the Local Planning Authority and the Historic Environment Record Officer at Nottinghamshire County Council within 3 months of the archaeological works hereby approved being commenced, unless otherwise agreed in writing by the Local Planning Authority. The post-investigation assessment must be completed in accordance with the programme set out in the approved Written Scheme of Investigation and shall include provision for analysis, publication and dissemination of results and deposition of the archive being secured.

Reason: In order to ensure that satisfactory arrangements are made for the investigation, retrieval and recording of any possible archaeological remains on the site in accordance with the National Planning Policy Framework.

With respect to the attached archaeological conditions, please contact the Historic Places team at Lincolnshire County Council, Lancaster House, 36 Orchard Street, Lincoln, LN1 1XX, 07880420410, email Matthew.Adams@lincolnshire.gov.uk to discuss the requirements and request preparation of a brief for the works.

It is recommended the resulting written schemes of investigation are approved by the LCC Historic Environment Officer prior to formal submission to the Local Planning Authority. Ten days' notice is required before commencement of any archaeological works."

Southwell Community Archaeology Group – "Southwell Community Archaeology Group (SCAG) would like to object to the above application because of the inadequate archaeological survey submitted with the application.

There should be a more comprehensive survey, including field walking and ground truthing of Lidar images, before the extent of any development is agreed as post determination mitigation may not be practicable.

We are concerned that the correspondence between the developers and SCAG during the consultation process (attached) has not been included with the application documents.

The limitations of the type of geophysical survey carried out are widely recognised and are acknowledged in paragraph 7.1.1 of Magnitude Surveys' report.

General limitations were compounded by significant magnetic disturbances and ferrous spikes and the fact that some areas were not surveyed. It is not surprising that 'no anomalies suggestive of archaeological features were identified' and no attempt was made to follow up the Lidar images submitted by SCAG which identified features of archaeological significance."

The Thoroton Society – "There is no doubt that finding non-fossil fuel means 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 coronavirus 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, are 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 crucial 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, swallows and buzzards flew – it is an area rich in birdlife and, of course, other wildlife.

The slopes on which the panels are proposed to be sited are nearly all in prominent view – examples are from the lane between Halloughton Wood Farm and Halloughton village and the views down to Westhorpe Dumble. This solar farm would have a widespread negative visual impact. 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. Recent months have proved how beneficial to people's health access to the countryside is – this proposal would severely impair such benefits which are also enjoyed by people from nearby villages and the Southwell community.

The area of land in question has not had the rigorous and comprehensive archaeological survey this proposal warrants. LiDAR scanning, however, reveals a palimpsest of very significant features in the area including a possible barrow, holloways and/or ditches. No permissions should be given or work commenced until a more thorough archaeological evaluation is undertaken. Should the proposal go ahead professional, accredited archaeologists would need to be on site during development in order to undertake a watching brief on groundworks: all potential archaeological areas found should then be subject to professional archaeological investigations, with the subsequent recording.

Turning to the village of Halloughton, this is a conservation village of great value. It is unique in that it has no thoroughfare, there is no way for vehicles to drive through as is the case in all other villages in this part of the Newark and Sherwood district. Thus it is a quiet backwater, still a farming village, a close community and a place of old buildings and carefully tended gardens. Part of the proposed site itself would come extremely close to the dwellings at the head of Halloughton village, a disruption to the peace and beauty residents currently enjoy.

The name of the village, derived from Old English, indicates that it is a settlement which lies in a small shallow valley. Alongside is Halloughton Dumble which, it has been demonstrated in recent years, is prone to severe flooding – something which will be exacerbated by climate change and, if allowed, by this proposed development with its vast area of impermeable panelling. This flooding issue is also true of the Westhorpe Dumble area.

In addition to the actual land on which the solar panels are proposed to be fixed, the entrance to the site is, according to the site plan, planned to be through a field next to the Church of St James, the graveyard of which is in itself a place of pilgrimage because of a number of graves of people of significance, including Sir Frank Stenton, former President of the Royal Historical Society, and Lady Doris Stenton FBA, herself an eminent historian. This proposed entry is very near the entrance to the village which is noted as being of particular beauty. Indeed the Conservation Area designation made in 1971 states very clearly the importance of the entrance into the village from the A612 – “the entrances to the village are particularly emphasised and important”. How therefore can this proposal be justified by this first intrusion into Halloughton alone - it is here that are sited the two most prized listed buildings of the village; one a building which started life as a 13th century tower, a rare form of building, to which was added to in the 14th or early 15th century a hall-house comprising hall with chamber above, and then a high-quality farmhouse added in the 18th century – all of which are still apparent in the current well cared for farmhouse. Manor Farmhouse was described by Pevsner as “rambling and picturesque” and its tower as “rare”. Dr Norman Summers, a long-time member of the Thoroton Society, undertook research into this building, once a prebendal house of the College of Southwell, and wrote a definite description of it in the Society’s Transactions. As Dr Summers states, here are “700 years of architectural and social history”. This is a most important building and, along with the Church of St James, deserves to retain an undisturbed and peaceful setting.

The access should not cut through any part of this very precious conservation village of Halloughton with its historic houses and buildings, others of which are listed. Nor should it go 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, a lane which is likely to have been in existence from, at the latest, the Anglo-Saxon period.

It is interesting that the title of this proposal has been changed to Cotmoor Solar Farm, presumably to take the focus away from one of the county’s treasures, the village of Halloughton. During this crisis period for the country, and the impossibility of a normal open consultation process, it is inappropriate that this application should be brought forward at this time.

In conclusion, it is hoped that this development will not go ahead and that land will be found which is less valuable in agricultural, wildlife and historic landscape and settlement terms and, potentially, in archaeological terms, and which is therefore more suitable for the generation of green energy. And, as other respondents have noted, meets the industry’s standard guidance for the location of such installations, which this does not.

Newark and Sherwood District Council considered that Halloughton was of such significance as to be designated a conservation area – it is to be hoped that it, and its surrounding landscape, will be protected from this most unsuitable proposal by a refusal of permission.”

Comments on Amended Plans: “The Society sent its strong objections to this proposal on 31st July 2020 and would request that this is considered again along with these further comments.

As far as the Thoroton Society is concerned nothing in the amendments alters its opinion that this proposal would be of the greatest harm to the historic landscape of and around the proposed site, to the very special conservation village of Halloughton

with its listed and other vernacular buildings, and especially to grade I* Manor Farm and Grade II St James Church. Indeed the clearer plans for the access to the site, adjacent to the church and in close proximity to Manor Farm, are wholly unacceptable. How can the applicants state that the access in this position “can be provided without significant works or alterations and is not within a built up area” when it is adjacent to the village church and opposite one of the most important listed buildings in the county! The applicants appear to consider the protection of one tree mitigates the whole access scheme, whereas the reality would be an urban style entrance to the village. The great emphasis put by the planning authority upon the uniqueness of the entrance to the village when it was made a conservation area in 1972 should be reason enough for this application to be seen as totally flawed: the company demonstrates its total lack of understanding of the impact the initial charm and historicity of the entrance to this special village has on resident and visitor alike.

The National Planning Policy Framework states that “local planning authorities should require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting.” There does not appear to be any reference to the significance of these two listed buildings in the application. The NPPF goes on to say that when considering the impact of a proposed development on the significance of a designated heritage asset “great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

The raft of photographs provided by the applicants do nothing to assuage the conviction that the historic landscape around Halloughton and adjacent farmlands would be ruined during construction, for the forty years thereafter, and compromised for the future. The long views captured by one of the objectors, an amateur photographer by his own admission, give a far better idea of the reality of this precious landscape and how it would be ravaged by such an alien construction.

As far as archaeological significance is concerned, the applicant contracted survey could be described as superficial and did not include reference to the LIDAR survey provided by Southwell Community Archaeology Group which showed potential archaeology on the site. Additional non-intrusive or intrusive evaluations would be needed to establish the character and significance of any preserved archaeological remains and, no less important, to establish whether areas seemingly lacking such remains are genuinely of limited archaeological interest. Indeed the Historic Environment Officer (Archaeologist) expressed concerns in his submission that “the current level of archaeological investigation has not been sufficient to identify either way the presence or absence of archaeology on the site”. There may well be much more to discover: but the construction process is likely to disturb or destroy what might be there.

The company lays great stress on the fact that this proposal, with its high magnitude of change, is a temporary construction – of forty years’ duration which is half a lifetime. Also that residents can expect a greater shield from the view of the solar panels after ten years – a long wait.

We are in the midst of major crises - the pandemic, the challenges arising from the UK's exit from the EU and, yes, climate change. All these necessitate a greater reliance on our countryside and especially our agricultural land. With access to imports of food produce now limited and uncertain, our farmers will be relied on to fill the shortfall. The impact of climate change calls on us to reduce our carbon footprint, of which buying local produce is an important component. Good agricultural land, which Defra and local farmers say the land in question is, should be used for growing crops, not for industrial use, even if it be to create cleaner energy. Additionally, so many people have found great solace and joy by walking in the countryside, and the rights of way in this area, with their ancient hedgerows and trees, have been well-used by many in these troubled times.

Probably one of the most notable features relating to this application is the large number of objections lodged to the original plans and to this amendment by individuals, local and from further afield, by farmers, by Southwell Town Council and the town's amenity organisations, the latter having deep and well-grounded knowledge of the settlements and countryside around the town, all part of the tourist attraction of the area.

Again, as has been pointed out by a number of the respondents, the timing of the submission of this amendment is questionable – in the midst of the Christmas season and in a severely restricted period of the Covid pandemic.

The Thoroton Society urges Newark and Sherwood District Council to refuse this application which would have such a detrimental and disastrous effect on a very special conservation village and an historic and unspoilt surrounding landscape, itself identified as “a coherent area with a strong functional integrity giving a good landscape condition” in the Newark and Sherwood Landscape Character Assessment.”

Southwell Heritage Trust – “The Southwell Heritage Trust would strongly object to this application. The magnitude of the proposal for a solar farm and battery stations with all associated works on 107Ha of undulating farmed countryside, in a wider area of outstanding beauty and historical interest, will have a major adverse environmental effect on the village of Halloughton and its surrounding landscape. It will, of necessity, impact on the important Halloughton Conservation Area, wildlife, archaeology, and possible aggravation of flooding risk amongst many other aspects that a development of this scale will produce.

It is interesting that the Solar Industry's own criteria ideally recommend the use of previously developed land for sites of 50kWp. The sale of this proposal can only be realised by the fact that is 1000 times bigger than the 50kWp trigger.

Due to the current pandemic, the public consultation has not been as effective and thorough as would normally be required for such a major development and it is, therefore, inappropriate to put forward the application at this time. The provision of green energy for the human race is accepted by so also is our requirement for the production of food and this site with its locality in the rural environment is more appropriate for food production.”

Historic England – *No Comments* - “Thank you for your letter of 15 July 2020 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.”

Comments on Amended Plans: “Thank you for your letter of 18 December 2020 regarding further information on the above application for planning permission. On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.”

NSDC Conservation Officer – “Main issue(s)”

The main historic environment issue in this case is what impact the proposals will have on the settings of various designated heritage assets. Conservation recognises that the potential benefits of the scheme, which results in the production of electricity from a renewable source, will need to be weighed against any harmful effects.

Heritage assets affected

There are no designated heritage assets within the proposals site, but there are a number of listed buildings in proximity, including (but not limited to):

- Halloughton Manor Farmhouse (Grade II*)
- Church of St James (Grade II)
- Barn at Halloughton Manor Farm (Grade II)
- Pigeoncote, granary and stable block at Manor Farm (Grade II)
- Barn at Bridle Road Farm (Grade II)
- These are situated within Halloughton Conservation Area.
- South Hill House (Grade II)
- Brackenhurst Hall (and associated estate elements such as the gateway, lodge, walled gardens) (all Grade II)

In the wider area, the significant national landmark of Southwell Minster (Grade I) and Southwell Conservation Area (CA) which includes a number of significant heritage assets (over 200 listed buildings). The closest listed buildings to the proposal site within Southwell CA include Bath Cottage (Grade II) and associated barns at Bath Cottage (also Grade II).

The Nottinghamshire Historic Environment Record (HER) identifies a range of heritage assets, including:

- Stubbins Farm (Local Interest)
- Halloughton Wood Farm (Local Interest)
- Features with potential archaeological interest

Legal and policy framework

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 'Act') requires the Local Planning Authority (LPA) to pay special regard to the desirability of preserving listed buildings, their setting and any architectural features that they possess. In addition, section 72 of the Act requires the LPA to pay special attention to the desirability of preserving or enhancing the character and appearance of the CA. In this context, the objective of preservation is to cause no harm, and is a matter of paramount concern in the planning process.

The Judicial Review *The Forge Field Society vs Sevenoaks District Council* reminds decision-makers of the importance of giving considerable weight to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990. Mr Justice Lindblom: "As the Court of Appeal has made absolutely clear in its recent decision in *Barnwell [Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council (2014)]*, the duties in sections 66 and 72 of the Listed Buildings Act do not allow a local planning authority to treat the desirability of preserving the settings of listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in *Barnwell* it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area, it must give that harm considerable importance and weight. This does not mean that an authority's assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognize, as the Court of Appeal emphasized in *Barnwell*, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering" (paras 48-49 of the decision).

In heritage conservation, therefore, there are two key legal requirements that apply to decisions concerning listed buildings and conservation areas. Simply put, these legal objectives require special regard to the desirability of preserving these types of designated heritage asset (sections 16, 66 and 72 of the Act). The courts have said that these statutory requirements operate as a paramount consideration, 'the first consideration for a decision maker'. Planning decisions require balanced judgement, but in that exercise, there must be a sense of the weight society, through parliament, wishes to place on an objective such as heritage asset conservation. The protection of listed buildings and conservation areas is regarded as highly important, and that should not be undervalued out of respect for both the law and democratic will.

Policies CP14 and DM9 of the Council's Local Development Framework (LDF) Development Plan Documents (DPDs), amongst other things, seek to protect the historic environment and ensure that heritage assets are managed in a way that best sustains their significance.

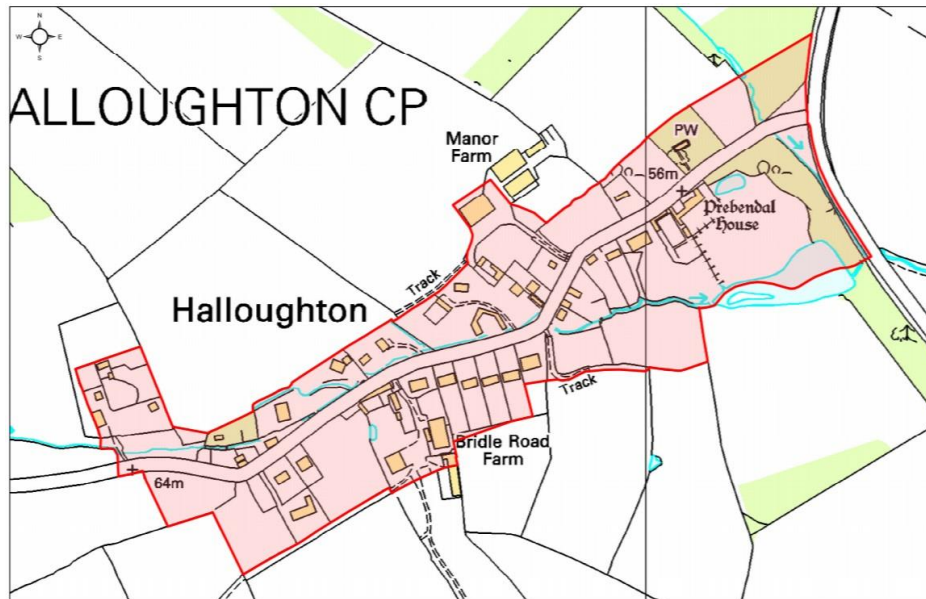
The importance of considering the impact of new development on the significance of designated heritage assets, furthermore, is expressed in section 16 of the National Planning Policy Framework (NPPF – revised Feb 2019). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, for example. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness. LPAs should also look for opportunities to better reveal the significance of designated heritage assets when considering new development (paragraph 200).

The setting of heritage assets is defined in the Glossary of the NPPF which advises that setting is the surroundings in which an asset is experienced. Paragraph 13 of the Conservation section within the Planning Practice Guidance (PPG) advises that a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.

Additional advice on considering development within the historic environment is contained within the Historic England Good Practice Advice Notes (notably GPA2 and GPA3). In addition, 'Historic England Advice Note 2: making changes to heritage assets' advises that it would not normally be good practice for new work to dominate the original asset or its setting in either scale, material or as a result of its siting. Assessment of an asset's significance and its relationship to its setting will usually suggest the forms of extension that might be appropriate. The junction between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting.

Significance of heritage asset(s) affected

Halloughton Conservation Area (CA) was designated in 1972. There is currently no adopted CA Appraisal.



The CA boundary covers the entirety of the village, which is small but very charming. It lies within the fold of hills to the south of Southwell, the single linear lane meandering along the valley of a stream. The grass verges, subtly varying in width, high hedges which tightly enclose the lane and many mature trees contribute to the special character of Halloughton CA. Indeed, the landscape surrounding the village is intrinsically linked. The designation statement for Halloughton from the 1970s states: "In fact it could be said that the visual quality of Halloughton is attributable more to its landscape, than to its buildings" (Notts County Council, 1972).

The valley position of the village and its linear plan-form mean that the entrances to the village are very important. From the Southwell Road direction, the funnelled entrance is defined by wide verges, hedges and trees, the view including an attractive stone wall lined with trees on the south side of the lane. At the western entrance to the CA, the transition from very open countryside to enclosed village is attractive.

The CA includes a number of fine historic buildings. The Church of St James is Grade II listed (designated 1961), and comprises the remnants of a medieval church (13th century- the surviving element being the east wall), largely rebuilt in the late 19th century by Ewan Christian. The church is stone ashlar with slate roofs. There is a nave, east chancel and bell turret with arched opening. The significance of the Church lies primarily in its special architectural qualities and historic fabric. The Church also enjoys a status within the parish, and whilst it does not include a landmark tower or spire element, it is nonetheless a prominent feature of the lane.



Extract from Sanderson (1835). The plan-form of the village is largely unaltered from this period.

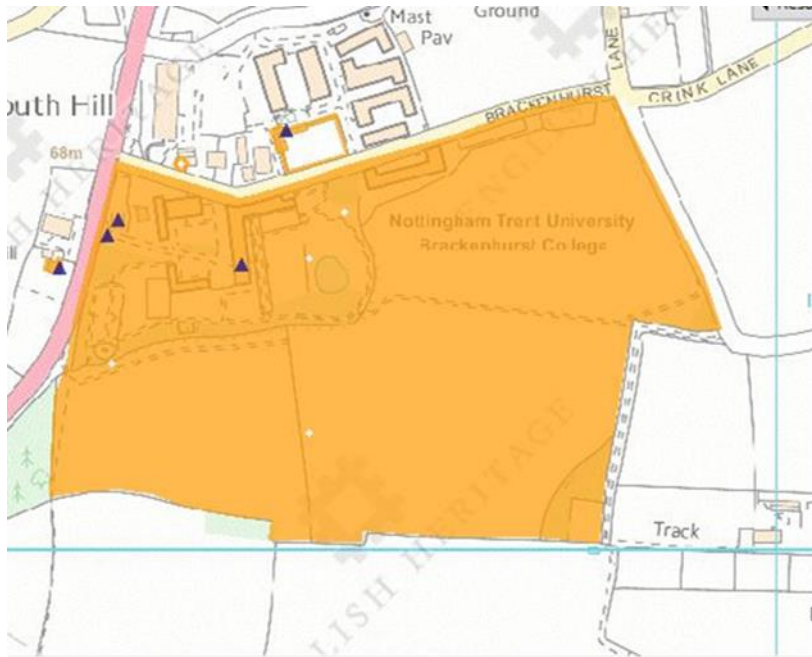
The Grade II* listed Manor House is the most significant of the buildings in Halloughton, reflected in its high grading. The house is a prebendal house of Southwell, incorporating a medieval tower house, which is very rare in Nottinghamshire (Pevsner suggest that the only other notable example is the ruin of Beauvale Priory incorporated into Strelley Hall). The earliest fabric of the property is contemporary with the 13th century church remains, evoking group values in the landscape at the eastern end of the village.



Manor House in 1979 (source: Inspire).

The period buildings elsewhere in the village predominantly reflect 18th and 19th century rural vernacular forms, reflecting historic estate architecture seen extensively within the wider landscape.

To the east of the proposal site is the Brackenhurst university campus. The principal building in this complex is Brackenhurst Hall, a Grade II listed building. The Hall was designed as a country house and includes an attached former coach house, orangery and extensive garden walls. It was built after 1828 for the Reverend Thomas Coats Cane. It was extensively remodelled in the late 19th century for W. N. Hicking before being converted to an agricultural college in 1949. This building was the birthplace of Viscount Allenby (1861-1936), British commander in Palestine during 1917-18.



The parkland to Brackenhurst Hall is identified as an unregistered park and garden. The Hall derives much significance from its landscape, occupying a prime location on higher ground directly to the south of the town. Interestingly, the Hall was designated in 1952, after it had been converted to an agricultural college in 1949.

The Hall comprises buff (gault) yellow and red brick, with stone dressings and hipped slate and lead roofs.

Associated heritage assets include:

- Garden walls and potting sheds 100m northeast of Brackenhurst Hall (Grade II listed);
- Lodge to Brackenhurst Hall (Grade II listed);
- Gateway and railings to Brackenhurst Hall (Grade II listed); and
- South Hill House (Grade II listed; designated May 1992).

South Hill House sits on the west side of the road, comprising a former farmhouse dating to c1800.

Beyond The Hall to the southeast is Brackenhurst Farmhouse, a Grade II listed building.

The Robin Hood Way, which is an important walking route, runs through Southwell Park, also an unregistered park and garden, culminating at its northern end with the landmark Minster building, a nationally significant landmark Grade I listed building. The landscape resonance with these heritage assets is palpable, and those who enjoy the network of lanes and

footpaths in this landscape are offered many attractive views which can include the Minster and the spire of the Church of Holy Trinity (typically terminating views on approach to Southwell from Nottingham Road).

The adopted Southwell CA Appraisal (2005) provides a useful assessment of the CA, including its origins, settlement layout patterns and architectural interest. The Nottinghamshire Extensive Urban Survey (EUS) Archaeological Assessment for Southwell (English Heritage; 2001) is also helpful. Southwell CA was first designated in 1968 and extended in 1970 and 1993. The existing CA boundary includes the Minster Church and distinctive Prebendal area, the historic commercial centre of King Street and Queen Street, the Burgage and the former hamlets of Easthorpe and Westhorpe. Key features of the CA are the presence of the Minster church, its well-preserved historic layout, the high proportion of listed buildings and unlisted buildings of quality, its strong character areas, significant archaeological interest and its attractive landscape setting. The Minster is a prominent landmark within the town and can be seen for miles around.

The Appraisal advises that Westhorpe has a high proportion of traditional buildings, most of which are listed or make a positive contribution to the character and appearance of the CA. They are characterised by their generally modest scale and their use of consistent building materials, which are normally brick and pantile. The position of the former hamlet located on the south facing slope of Westhorpe Dumble is considered to be a positive feature of the CA.

Bath Cottage and barn range (both Grade II listed) sit in the southwest corner of the Westhorpe character area. This character area is very distinctive and derives significance from the close-knit village form on the escarpment and the openness of the landscape southwards. Bath Cottage is set in this wider landscape and is an attractive late-18th century house with steep roof pitch and simple vernacular detailing.

The wider landscape contains further heritage assets. Grange Farmhouse on Radley Road sits to the northwest for example, and further along that road to the northeast is Halam, which contains a number of listed buildings.

Assessment of proposal

The proposal is for a solar farm with a capacity of 49.9MW for a period of 40 years on land to the north of Halloughton, comprising 13 fields. These fields form a contiguous 'L' plan above the village of Halloughton, and on a northerly line towards the Oxtun Road.

Conservation **strongly objects** to the proposed development.

The impact of such a large industrial development on the immediate setting of Halloughton Conservation Area (CA) is likely to be significantly adverse. The proposal will be prominent in the landscape, and will have the effect of swamping the historic village of Halloughton. This will be particularly noticeable at the entrance to the CA at both east and west entrances, but also from within the CA and from outside where intervisibility is possible (including from bridleways to the south and east).

Impact on individual heritage assets within Halloughton CA is reduced by the presence of extensive hedge and tree screening. However, this mitigation will be less effective in winter. The solar arrays are within 100m of the Church, and around the CA. The setting of the listed buildings in Halloughton are not limited to the immediate curtilage of those buildings, but

includes one's experience of traversing the Main Street and rural setting around the village (there are several tracks and footpaths around the village). The solar panels will be a dominating entity in very close proximity, distracting and fragmenting the intimate rural context of Halloughton.

The proposal site is not part of any formal designated landscape. However, the landscape here has intrinsic character and beauty, and offers attractive walking routes between Halloughton, Halam, Oxtun and Southwell. The proposed solar panels and associated infrastructure, as well as access tracks, security fencing and CCTV columns would comprise a significant new element to this landscape. We appreciate that the countryside includes a variety of different forms of development, from traditional farmsteads to modern portal barns. In this case, however, the long rows of panels, internal access tracks and ancillary structures result in a utilitarian form of development that would provide a stark contrast to the unspoilt open qualities of this landscape.

We are also concerned about impact on heritage assets at Brackenhurst, including the Hall and South Hill House which is most prominently exposed to the solar farm proposals. Whilst we accept that there is unlikely to be any intervisibility from the Hall itself, there will be an impact on the experience of travelling along the Nottingham Road to and from Brackenhurst. The applicant has not presented any persuasive evidence that there are no material receptors within and close to the historic parkland surrounding the Hall.

The duration of this development is 40 years. For this entire period, the landscape would be irrevocably changed. Although hedges are retained to fields, and further landscape mitigation might be possible, the complete infilling of the fields on what is an undulating landscape ensures that the solar panels would be highly visible. The array of dark grey panels will disrupt the historic field pattern which contributes so positively to the setting of Halloughton CA. The industrial shape and finish of the panels would be very discordant with the patchwork of arable fields and greenery. This area is extremely popular with walkers, and includes the significant Robin Hood Way (which passes in close proximity to Brackenhurst via Westhorpe). Their enjoyment of this landscape and the experience it offers in proximity to heritage assets in Halloughton, Brackenhurst and Southwell will therefore be diminished.

The proposal will have some impact on the rural setting of Stubbins Farm, a non-designated heritage asset. Tree cover and landscaping offers some mitigation in this context.

Notwithstanding the above concerns, we have found no harm to any other identified heritage assets, including listed buildings at Westhorpe and Halam.

Overall, we find the proposal to be harmful to the setting and experience of Halloughton CA, as well as to the setting of listed buildings within the CA, notably the Church of St James and the Manor House. Whilst we accept some of the arguments presented by the applicant with regards to tree and hedge buffers, the solar farm proposal remains a dominating and alien feature to this attractive rural landscape.

Some harm will potentially be caused to the setting of heritage assets within the Brackenhurst complex, as well as South Hill House. Further landscape assessment is required to demonstrate conclusively the assumptions made in the applicant's heritage statement.

In this context, the harm to the setting of any listed building is contrary to the objective of preservation required under section 66 of the Act. The proposal is also contrary to heritage

advice contained within the Council's LDF DPDs and section 16 of the NPPF. For the purposes of paragraphs 193-195 of the NPPF, the harm identified to the setting of Halloughton CA and listed buildings therein is less than substantial. In their heritage statement, the applicant also accepts that this is the case. However, whilst they argue that this is at the lower end of less than substantial harm, we feel that this is at the higher end.

Harm to non-designated heritage assets such as Stubbins Farm requires a balanced judgement. We appreciate that the perceived environmental benefits of the proposal may prove to be compelling when judged against the relative significance of heritage assets such as Local Listings."

Comments on Amended Plans: "[The amendments made are] not sufficient to remove my objection. I believe that the tweaks to the scheme are relatively minor and only offer very modest mitigation.

As previously mentioned, I do not agree that this is simply a balancing exercise. The public benefits of the scheme must be decisive. This is consistent with recent High Court decisions. However, quite rightly, this is a matter for the decision-maker. The applicant agrees that harm is caused to the setting of several designated heritage assets as a result of the proposed development and has sought to mitigate those impacts (short of significantly reducing the quantum of development). I appreciate that we differ in opinion with the applicant on the scale of the harm within the 'less than substantial harm' bracket, but I cannot reconcile their conclusion of lower end unless the development to the north of Halloughton was substantially reduced, or even removed from the scheme. We should not underestimate the sheer size of the proposal in the context of a small, idyllic rural conservation area with many attractive period buildings. The proposal, if permitted, would adversely change the setting and context of the settlement for the duration of its life, a not inconsiderable period of time."

Neighbour/Interested Party Comments

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- Concerns regarding inability to access comments or responses to the community consultation process undertaken prior to the submission of the application.
- Unsustainable location/ Suitability of the location
 - o Does not use previously developed land, brownfield land, contaminated land, industrial land or low classification agricultural land.
 - o This development is on a largely undulating agricultural landscape
 - o The height and dominance of this development explains the considerable visibility it would have across the locality as shown on the Zone of Theoretical Visibility (ZTV) map. The 2 affected Conservation Areas (CAs) of Halloughton (most impacted), and Southwell, including Westhorpe, are situated below in river/watercourse valleys.
 - o There will be an undue impact on the visual and experiential amenity of all of the nearby domestic properties

- The agricultural land classification of Grade 4 is incorrect when compared with Natural England's mapping which shows the land as Grade 3. The only Grade 4 land in the area is that at the gravel pits at Hoveringham. Local farmers are also clear that the land has always been accepted as Grade 3. The conclusion that the land can rarely achieve reasonable crop yields is incorrect and can be disproven by local farmers. The land consistently returns cereal yields of 3.5 tons per acre with occasional peaks of 4.5 tons. This is not indicative of land unsuitable for arable farming. At a time where our departure from Europe heightens the need for food security and the value of productive farmland, this is a significant and worrying oversight. Such a consideration should be at the heart of this planning process.
- No weight should be given to the applicants agricultural land classification report as: there is no explanation for the difference from the Natural England dataset. There is no evidence to demonstrate the soils are the depth referred to in the Report. There is no analysis of each soil sample. There is no indication from where each sample was extracted. It follows that the scheme fails to recognise the wider benefits of retaining best and most versatile agricultural land in agricultural use, contrary to paragraph 170(b) NPPF.
- The planning balance between the need for Newark & Sherwood to meet its climate change obligations as set out in the Government Renewable and Low Carbon Energy Guidance (<https://www.gov.uk/guidance/renewable-and-low-carbon-energy>) and the protection of the local environment and communities is not met by this Application.
- The applicant has failed to show adequately that its search for this site was rational and not atypical for the industry as a whole. For example, the Solar Industry's Planning Guidance of Development for Large Scale Ground Mounted Solar PV Systems is that sites should be level, preferably on brown field, contaminated land, industrial land or agricultural land with ALC classification 3b,4 and 5.
- Objection to the loss of good quality agricultural land to industrial use
- The size of the solar farm is entirely disproportionate to the surrounding area
- The Applicant advances inadequate justification for the use of Greenfield BMV agricultural land contrary to paragraph 170 NPPF and the PPG "Renewable and Low Carbon Energy" policy.
- The new ALC Assessment re-classifies the land as 3b – the applicant's assessments identify that climate is not a limiting factor to the ALC of the site and the reason for the 3b class is due solely to soil wetness. However, the relatively benign climate and low rainfall, coupled with the elevation and gentle slopes of the site to natural drainage channels, are positive factors towards raising the ALC to 3a rather than 3b. Whilst soil wetness will be a limiting factor to the agricultural value of the site in terms of opportunities to cultivate and risk of poaching (ameliorated because of low rainfall) the water holding capacity of the soil is a positive to enable high crop yields to be

produced. There is a national requirement that the best and most versatile land should be protected from development – NSDC should obtain its own independent assessment of the ALC for the site.

- Flooding

- The supporting documents fail to identify known flood events which have occurred in Halloughton as a consequence of the undulation of the surrounding land. Serious flood events in 2013 where flood waters were in excess of meters deep. Further flooding in 2015 and in the winter of 2019 has occurred.
- Halloughton needs to be protected from both the construction phase of this industrial development but also the 40-year impact of solid solar panels on field run-off down slopes to the village below.
- The proposal will increase the risk and likelihood of flooding in Halloughton
- The proposed entrance to the site is in a hollow that fills with water frequently
- The submitted information with this application does not adequately appraise surface water flooding risks
- NCC Flood risk team have suggested mitigation measures must be controlled via condition – given this information has not been provided upfront, Committee members cannot make an informed decision.
- Both Halloughton and Westhorpe will have faster and greater runoff from acres of panels if there are not attenuation ponds built into the design of the solar farm. These would have significant positive benefits from an ecological point of view, especially for the local population of Great Crested Newts, along with other wildlife.
- The proposed swales and attenuation basins are not clearly shown on the plans and it is unclear how these would be managed/maintained to prevent flooding
- The amendments do not correct the omissions in the original planning application which failed to meet the mandatory requirements of Policy E1- “Flood Risk Assessment and Mitigation” and Policy E2 -“Flood Resilient Design” in the Southwell Neighbourhood Plan(SNP) for land in Southwell Parish. Essentially there remains a need for the applicant to agree a viable flood mitigation plan with the Lead Local Flood Authority, prior to any submission to the District Council Planning Committee.

- Landscape Impacts

- The development will not conform with the NSDC aims for the “Mid Nottinghamshire Farmlands” countryside around Halloughton as outlined in its Landscape Character Assessment for the area- “Conserve the local vernacular and reinforce in new development”.
- At a height of 3m (10ft), 1 m higher than a permitted domestic fence, the arrays of thousands of solar panels together with their associated security fencing

infrastructure will create a visual blight. The substation will be a permanent industrial feature within sight of the village and distribute industrial noise to nearby properties.

- The footpath from Epperstone is elevated and provides ramblers with a picturesque view of the way into Halloughton and of Brackenhurst on the other side. No amount of hedging will conceal this part of the solar farm which also will be visible from the A612 at High Cross – an approach to Southwell which the residents of Halloughton fought hard to maintain when they opposed the erection of wind turbines at Brackenhurst in 2014. Panels in the field known as The Bank, adjacent to Stubbins Lane will also be visible from High Cross.
- There are a number of omissions and inaccuracies within the LVIA. For example, this Applicant uses a Zone of Theoretical Visibility (ZTV) of 3km. This is at odds with the solar industry's BRE Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems (BRE) which states that in order to predict impact the Applicant should 'Provide a Zone of Theoretical Visibility (ZTV) diagram for the development indicating as a minimum 1km, 2km and 4km radii from the site'
- The solar farm would actively deter walkers and riders from the important landscape and heritage trails in the local area which are important for the tourism of the site.
- The solar farms will be intrusive and alien in this rural landscaped setting and will result in significant harm to the character of the area.
- There are a number of errors or omissions within the LVIA.
- The fencing, CCTV and compounds surrounding the solar farm will be oppressive in the landscape and degrade the user experience of ramblers/footpath and bridleway users.
- The landscape planting proposed is unlikely to completely screen the solar panels from nearby residential receptors.
- The likely effects of the proposed 100 ha solar farm on landscape and visual receptors have been underestimated within the LVIA accompanying the application, and the findings should not be relied upon when considering landscape and visual effects.
- Having undertaken an independent high level Outline LVIA, it is considered that the construction of the proposed solar farm would result in significant adverse residual effects on landscape and visual receptors at the site and in the surrounding landscape.
- The development would be inconsistent with the landscape conservation and enhancement aims of the landscape policy zones in which it sits, contrary to Policy CP13 Core Strategy, Policy DM5 Allocations and Development Management DPD and paragraph 170 NPPF.

- The additional winter views in the LVIA Addendum confirm the considerable adverse impact this proposal would have on the landscape. The view of Southwell Minster taken from PRoW 209/42/1 is also omitted.
 - The map of the Zone of Theoretical Visibility (ZTV) for the development demonstrates that it will potentially be a feature in the landscape from a number of distant viewpoints including from high ground on the east side of Southwell. The ZTV shows the development could be viewable from a wide band of countryside surrounding the site. Within that zone the development will be clearly visible, including security fencing, from any Public Right of Way (PRoW) across or surrounding the site. Whilst it can be argued that hedgerows and trees could be ameliorating features in screening the development, many of the current photomontages do not support that contention. The hedgerows shown in the photomontages are often of the Nottinghamshire minimalist provision, affording little screening. For these to be viable screens there will need to be conditions in any planning approval that they are maintained at a suitable height for that purpose which in some instances raises questions over ownership and management control. The photomontages which demonstrate this problem are-Base line viewpoints 1, 5A,5B,9B photo 2, 10 photo2, 11B photo2,12A,12B photo 2 looking north and 14. These all show vestigial hedges which in their present state will be ineffective in screening the development.
 - A site visit is necessary to validate the photomontages (as many appear not to correspond with the map locations) and other more critical viewpoints to fully see the size of the development. In these respects, the purpose of NSDC Landscape Character Assessment must be questioned. If it is for the benefit of those viewing the landscape then, in addition to those seeing it from a distance, consideration must be given to Halloughton residents and those using the PRoWs around the development. They will not see the landscape as described in the NSDC Landscape Character Assessment. This applies particularly for those using the PRoWs for whom the experience will be akin to walking around an industrial site with an overbearing presence of the intended construction, security cameras and fencing.
- Heritage Impacts
- The development would give rise to less than substantial harm to the Halloughton Conservation Area without an adequate justification contrary to Policy CP14 Core Strategy, DM9 Allocations and Development Management DPD and paragraph 134 NPPF. There is inadequate evidence to determine whether the development would give rise to harm to any potential archaeological resource contrary to DM9 Allocations and Development Management DPD.
 - The creation of a new tarmac road in Halloughton, for at least 15 meters from the village street, and the permanent destruction of trees and hedgerow (given that access to the permanent substation will always be required) creates substantial harm to the CA. The current approach into Halloughton has great conservation value which will be wholly eroded.

- Photos and statements contained within the Heritage Survey are inaccurate resulting in omissions in inter-visible views between the proposal solar farm and heritage assets.
- The impact on Halloughton CA will be considerable, with the southern boundary of the development only 200m distant from the nearest property. Virtually every property, as shown in the ZTV, will have sight of the solar panels and sub- station, as will walkers and riders from the Bridle Road Farm bridleway and the Halloughton Wood byway which will impact visual amenity and the setting of the Conservation Area.
- There will be a negative impact on the setting of the Grade 2* listed Manor Farm whose curtilage lies directly opposite the proposed tarmac access road to the construction site, and on that of the Grade 2 listed St James Church with its graveyard almost adjacent to this construction site access road.
- The entrance into Halloughton is included within the Conservation Area and is an important entrance to Halloughton.
- The scheme would result in harm to the setting of a number of listed buildings, the Conservation Area and the rural landscape setting - the public benefit of the proposal would not outweighing the significant damage to the CA and its rare heritage assets.
- There would be an unacceptable impact on Southwell CA, especially on the Westhorpe area's footpaths and bridleways, with the ZTV showing the extensive nature of the views of the development. Given that the trees and hedgerows shielding the site are deciduous, this will be especially the case for 6 months of the year. The Applicant's Viewpoint photos only show full-leaf views.
- There will be harm to the significance of Southwell and its important heritage assets. There will also be views from Halam, Edingley, Thurgarton and Bleasby parishes and Normanton which will cause harm.
- There are omissions within the Archeological Assessments indicating that the site has been insufficiently surveyed. Should the construction of the solar farm go ahead this could lead to the wholesale destruction of a range of archaeological sites.
- It has been accepted nationally, that while the public benefit of renewable energy schemes is important, the preservation of both heritage assets and their surroundings carries considerable weight and importance. The 40-year life span for this development makes it an even less acceptable proposition for sustaining the agricultural landscape which makes Southwell so special.
- The application site has has unimpeded views of Belvoir Castle 20 km to the south. Harlaxton and Belton Folly can also be seen to the E of Belvoir making this landscape very sensitive.
- The proposals to assess the archaeology fall short of the best practice guidance from the LCC archaeologist and ignore his requirement that further

investigation is required. The recommendations given by the officer should be undertaken before the application is submitted to the NSDC Planning Committee. To leave archaeological investigation until work on the site is in progress risks the destruction of potentially valuable artefacts or features.

- The amendments do not address that the entrance to the solar farm will degrade the rural, historic access to Halloughton. It also remains the case that the development will have a negative impact on the Halloughton Conservation Area, listed buildings within it and the rural setting of the village.

- Impacts on Amenity

- Noise from the battery stations and inverters will affect the closest residential receptors. External noise levels will be great and will impact on the enjoyment of outside spaces. The Design and Access Statement acknowledges at 3.9 that the siting from the northern edge of Halloughton 'reduces' but does not eliminate the potential effects on residential amenity.
- The important amenity for Southwell and the surrounding area of the footpaths and bridleways will be compromised which have proven to be important during the Covid-19 pandemic. Riding or walking will be made difficult during the construction phase and then a greatly devalued experience thereafter. For the lifetime of most in the community: 40 years, this development will negatively change the setting and constrain the leisure pursuits of walking and riding
- The Environmental Health Officer states 'Both the physical and mental health impacts of the development need to be considered in the consultation process' and that there will be a visual impact in terms of amenity user perception.
- Enclosure of the surrounding footpaths and bridleways will significantly impact the amenity value of the area and user experience. The new Agriculture Bill 2020 designates rights of way as "Public Goods" and encourages the planning of new ones. To the south and west of Southwell there is an extensive network of byways, bridleways and footpaths. These have huge amenity value not only for Halloughton and Southwell residents but also, given the link to the long distance path, the Robin Hood Way, to people across Nottinghamshire and beyond – the enjoyment of which will be significantly reduced.
- The CCTV cameras will breach GDPR and the privacy of footpath users

- Impacts on Habitats

- Omissions within the Survey: Wintering bird species only were identified but the submitted survey but raptors were ignored – however local people cite presence of barn owls nesting, kestrels, sparrow hawks, buzzards and red kites. The presence of these raptors demonstrates the richness of the small mammal population in the development site which have been undervalued. No hares were identified but are common in the area – as are roe deers, which will be severely impacted by the development, as will the protected badgers in the area.

- Surveys were not undertaken at the optimum times of year.
 - The Arboricultural Impact Assessment acknowledged that sectional removals of trees will be needed, each of approximately 4-5 meters across to allow for the new access road. The hedgerow at the entrance to the site will also be removed. This is considered 'very minor' by the Applicant but will have a considerable impact on the entrance to the CA and the setting of the heritage assets.
 - The proposal will create a barrier to a large animal movement from surrounding land. The proposed solar farm will create a barrier to large animal movement between the two areas. The frequency of gaps in the security fencing "at several locations" is not specified.
 - The mitigation measures are inadequate but would not be necessary without this intrusion into the natural landscape.
 - Further greening of the project should include extensive planting of wildflower meadows within the arrays. This would actively significantly increase the biodiversity of the site to insects, plants and small mammals.
 - The solar farm would dwarf the Dumble, which is a unique feature of the area.
 - Fencing will prevent the interconnectivity of species and the impede the districts green corridor network
 - The amendments do not correct the omissions in the original application for land in Southwell parish to meet SNP policies E3 -"Green Infrastructure and Biodiversity" and E4- Public Rights of Way and Wildlife Corridors". Nor is there any proposal to agree a biodiversity management plan for the site with the Nottinghamshire Senior Conservation Officer or other similarly qualified person.
- Construction, Access and Highways Safety
- The proposed access to the site from the narrow village street in Halloughton for at least 6 months during the construction phase would see 1610 movements of hgv lorries plus other vehicles would result in significant disruption to local residents. The size of the vehicles which would be crossing a culvert would create a huge traffic problem for all of the residents and businesses in Halloughton.
 - The Solar Photovoltaic Glint and Glare Study shows, there will be impacts on road users and residents. The B6386, with 16 out of 18 assessed road receptors suffering solar reflection and all of the receptors on the A612 the same, together with 21 out of 27 assessed dwellings, will have no screening for 6 months of the year from the deciduous hedgerows and trees.
 - There have been a number or minor accidents at the junction of the A612 with the Main Road through Halloughton making this access unsafe for increased HGV movements

- The proposed entrance would be between the tree and the lamp post. The tree, is of historic interest as it was planted by the villagers of Halloughton to commemorate the Queen's Silver Jubilee and alternative access' should be explored to retain this as a feature for the village.
- There are a number of errors and inaccuracies within the Construction Traffic Management Plan
- The main road through Halloughton is a no through road, it is narrow (two cars cannot pass) and there will be an increased risk to highway safety with construction traffic vehicles being introduced to this road.
- There should be clear stipulations placed on the developers to reinstate any construction damage to verges/the highway
- Historical Footpaths would need to be legally diverted and have not been accurately shown on proposed plans.
- An existing Bridleway is shown as being moved from one side of the hedge to the other. This will need a legal diversion.
- The route of a historic footpath is shown incorrectly on the submitted plans – the plan needs to show the full footpath and how the gated entrance related to the footpath at the public highway.
- Other matters
 - The supporting documents refer to stock fencing but this is incorrect as security deer fencing is proposed
 - Concerns that the Glint and Glare study has not considered private airfields
 - Many of the surveys rely on landscaping to screen views, but these will only be in leaf for six months of the year
 - There is no mention of the decommissioning plans, concerns that this will become a greenfield site that is lost to potential future brownfield redevelopment. Concerns that there is no information showing how the site would be returned to agriculture after 40 years.
 - There would be no direct benefits to Halloughton or Southwell – the energy produced will not benefit the district
 - The Planning Committee have already determined that Halloughton needs to be protected from unacceptable development
 - Enclosure of footpaths and bridleways will increase the risk to horse riders
 - This solar farm would be one of the largest in the country and would have a destructive impact on the environment
 - It was accepted by the Secretary of State in his dismissal of the Appeal by Nottingham Trent University (App 11/00792/FUL), for a development also located approximately 2km from the Minster, 'that [while] addressing climate

change is in itself a public benefit and that renewable energy is sustainable by definition. For the reasons given at IR277, the Secretary of State agrees with the Inspector that, although the importance of renewable energy to the future energy security of the country cannot be underestimated, considerable weight and importance also needs to be placed on the desirability of preserving heritage assets and their surroundings. In this particular case, the Secretary of State agrees with the Inspector that the effect of the appeal scheme, which would only be about 2km from the Minster, would be to appreciably diminish the largely unaltered quality of its surroundings and alter for the worse the ability to understand and enjoy the heritage significance of the Minster and the conservation area – which have longstanding and meaningful links with the countryside around the town.’ He also agreed with the Inspector that ‘although the scheme would be time limited, 25 years would represent more than a generation in which the heritage significance of the highest importance would be diminished’.

- The submitted information with this application fails to adequately assess the scheme against the Southwell Neighborhood Plan
- The application does not take proper account the effect the development will have in terms of the stress on the Halloughton community from, for examples, noise and glare. Neither does it address the effects it will have on the potential reduction in general public health benefits from the reduced amenity value of the Public Rights of Way over the site.
- There are errors on the application form, for example Q. 11 Assessment of Flood Risk. One of the questions is answered wrongly. The proposal is within 20 metres of a watercourse at more than one point.
- Statement 5.6 “The access will utilise an existing farm track which currently has a low level use” in the arboricultural impact assessment is inaccurate. At the point where the site layout shows the access to be there is no existing farm track, nor is there a farm access. The boundary with the village street is made by a mature hedgerow growing up and through a fence. The reference to ‘upgrading the existing track’ is therefore inaccurate also.
- The application should not have been submitted during a global pandemic as this has had implications on the ability of people in the community to meet, discuss and for community involvement with the project. The whole application should have been deferred until proper public consultation and scrutiny was possible.
- The Statement of Community Involvement is flawed as many questions raised by the community were left unanswered. It is not clear what, if any, changes were made to the scheme following the public consultation.
- The promotion of green energy should not be at a wider environmental cost.
- The scale of the solar farm is excessive and inappropriate for this location

- Halloughton village is almost entirely powered for heating by oil burning boilers which after 2025 will need to be replaced by cleaner energy sources. Some help from the developers could be forthcoming to assist in some small way for homeowners to adopt cleaner/greener alternative heating.
- The access should be re-sited to protect the approach into Halloughton and more planting should be incorporated
- Many people in Halloughton are not able to use the computer and during the pandemic have not been able to adequately access the documents relating to this application.
- Lack of comments from Notts Wildlife Trust is alarming
- Loss of such a large amount of agricultural land will threaten food production
- An important part of the Planning process is to find suitable locations for different developments. This was done with the local Development Plans for new housing and the same process should be undertaken for Solar Farms. We should not be allowing the industrialism of valuable farm land just because some one is willing to sell it.
- This is not a Community-led scheme, as preferred by NSDC for green/clean energy projects
- Access to this landscape is very important for mental health and well-being and this will be eroded if the application is approved
- Southwell attracts a significant number of tourists, who contribute to the local economy. Many of them explore the conservation villages and appreciate seeing heritage buildings in their natural settings. They walk the footpaths, enjoying the views and the natural environment. The benefits to both visitors and locals would be severely affected by the installation of such a large industrial-scale power generation site in close proximity to the town.
- The £200,000 business rates JBM Solar Ltd will pay to NSDC if it goes ahead at this scale will be tempting in a cash-strapped economy but will come at an unacceptable cost to this rural area
- No evidence has been provided regarding the carbon off-setting of this development after balancing the gain of solar energy against the carbon cost of installation and the associated journeys of construction workers and delivery of materials. A full lifecycle analysis of the carbon-dioxide (equivalent) emissions per kilowatt hour of electricity generated would be able to assess whether there was actually any and how much carbon offset gained.
- It is not clear whether the panels used would be the recyclable type or will add to landfill when obsolete.
- The attraction of Brackenhurst Campus is based on its rural character, which will be harmed by such a large solar farm being built almost next-door.
- The solar farm will attract thieves and vandals

- 40 years is more than one generation. For most local people this will be a permanent change of use.
 - This application will set a dangerous precedent.
 - The application conflicts with the development plan policies and SPDs
 - The Amendments submitted were intentionally deposited before Christmas to ensure local people would be unable to comment on the amendments
 - The Amendments submitted do not address previous concerns raised
 - The owner of the land does not farm the land themselves and does not live in the area so perhaps underestimates how much the land in question contributes to the well-being of local communities
 - A Glint & Glare Assessment has not been undertaken for the private airfield at Bankwood Farm about 1.5 miles to the west / southwest of the proposed site, which is used by a Hang Gliding Club whose members frequently fly between Bankwood Farm and an airstrip at Caunton.
- Comments in support
- We are facing a local, national and global climate emergency and must plan for future generations, this application would help provide a green energy source. Some years ago, Halloughton village successfully fought off proposals for wind turbines which would have overshadowed the district and especially the historic Minster. At that time the young people of Southwell ran a campaign called "If not, what?" which is particularly relevant again in this case.