

This matter is being dealt with by:

Kathryn Haley

Reference: BAS 24 00384

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Sent via email to

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FAO James Mountain

2nd May 2024

Dear Sir/Madam

Ref. 24/00384/FUL: Land Adjacent to A614, Worksop - Installation and Operation of a Solar Farm and Battery Energy Storage System (Output up to 40 MVA), with Associated Works, Equipment, Infrastructure and Landscaping

Thank you for your letter dated 11th April 2024 requesting strategic planning observations on the above planning application. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make.

In terms of the County Council's responsibilities there are a number of elements of national planning policy and guidance that are of particular relevance in the assessment of planning applications and these include Minerals and Waste, Education, Transport and Public Health. Where necessary, the County Council will request developer contributions towards its services in accordance with its adopted [Developer Contributions Strategy](#), which is available to view online.

Highways and Flood Risk Management

The County Council as Highway Authority and Lead Local Flood Authority is a statutory consultee to Local Planning Authorities and therefore makes separate responses on the relevant highway and flood risk technical aspects for planning applications.

Should further information on the highway and flood risk elements be required, contact should be made directly with the Highway Development Control Team and the Flood Risk Management Team to discuss these matters further with the relevant officers.

Minerals and Waste

The adopted Nottinghamshire and Nottingham Replacement Waste Local Plan, Part 1: Waste Core Strategy (adopted 2013) and the saved, non-replaced policies of the Waste Local Plan (adopted 2002), along with the Nottinghamshire Minerals Local Plan (adopted March 2021), form part of the development plan for the area. The Pre-Submission Version (August 2023) of the emerging Waste Local Plan, which has been submitted for examination (March 2024), should also be given weight as a material consideration. As such, relevant policies in these plans need to be considered. In addition, Minerals Safeguarding and Consultation Areas (MSA/MCA) have been identified in Nottinghamshire and in accordance with Policy SP7 of the Nottinghamshire Minerals Local Plan, these should be taken into account where proposals for non-minerals development fall within them.

Minerals

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In relation to the Minerals Local Plan, there are no Minerals Safeguarding and Consultation Areas covering, or in close proximity to, the site. There are no current or permitted minerals sites close to the application site. The County Council therefore does not wish to raise any objections to the proposal from a minerals' perspective.

Waste

In terms of the Waste Core Strategy, there are no existing waste sites within the vicinity of the site whereby the proposed development could cause an issue in terms of safeguarding existing waste management facilities (as per Policy WCS10 of the Waste Core Strategy).

As set out in Policy WCS2 'Waste awareness, prevention and re-use' of the Waste Core Strategy, the development should be 'designed, constructed and implemented to minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arising from the development.' In accordance with this, if the proposal is likely to generate significant volumes of waste through the development or operational phases, it would be useful for the application to be supported by a waste audit. Specific guidance on what should be covered within a waste audit is provided in paragraph 049 of the Planning Practice Guidance.

I would draw your attention to a 'Historic Landfill Site' categorised under the Environment Agency Historic Landfill Database ref. EAHLD22086 'Elkesley Pumping Station' (1/77/59/67NE). This site accepted inert waste between 1978 and 1982. This site and its 250m buffer zone cover the north-eastern parts of the proposed site near to 'Broom Covert'.

Archaeology

The County Council's Archaeologist has checked the site against the Nottinghamshire Historic Environment Record, read the submitted information with interest and has the following comments to offer:

The application site is within an area of high archaeological potential of Iron Age and Roman date; the course of a major Roman road runs under, or in the immediate vicinity of, the A614 from Ollerton to the modern junction with the A1. Just south of that junction the Roman road is evident in Lidar data to the east of the present road. There is potential for survival of the road and/or roadside settlement on the western side of the site. The geophysical survey does show hints of features but the strong response from ploughing across the survey results may be obscuring a lot of detail.

It is noted that an obvious area of settlement in the north of the site has been removed from the scheme. This is a welcome and pragmatic move in response to the DBA and geophysical survey results.

In order to make appropriate planning recommendations the archaeology on the site needs to have been suitably characterised and its significance assessed. At present we do not have enough information beyond conjecture based on the results of the DBA and geophysical survey. There is a lot of 'noise' in the geophysics results that could very easily be obscuring the identification of archaeological features.

The County Council's Archaeologist disagrees with the statement in the DBA that the impact of solar farms is low. The cumulative impacts of solar schemes on archaeological remains and their setting, and on the historic landscape, have been very much underestimated because of this notion. The mitigation options may be more flexible than on some other forms of development, but the impacts to archaeology are comparable. Piling, cable trenching, associated infrastructure, and activities associated with the construction, operation and decommissioning of the site all have impacts, some of which are highly intrusive. There are also unknowable, or at least hard-to-predict, impacts from future refits or upgrades.

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The DBA suggests that further evaluation could be achieved by way of a condition, but this route is not advised. It is highly likely that there are further areas of archaeological activity that have not yet been identified, especially given the site's proximity to the river and Roman road. Should significant and extensive archaeological remains be discovered post consent this may have an impact on the deliverability of the scheme, and any conditions requiring their appropriate mitigation might be judged to be unreasonable.

As such it is strongly recommended that the scheme of evaluation via trial trenching, recommended by the DBA, is carried out prior to the application being determined as per the requirement of NPPF paragraph 200. This will allow a proper assessment of archaeological potential, risk and significance, and will serve to inform any appropriate mitigation strategy and planning recommendations.

The County Council's Archaeologist would be happy to provide further advice or comment as required.

Transport & Travel Services

General Observations and Accessibility

The application is for the construction and operation of a solar farm and battery energy storage system (BESS), with associated works on land adjacent to the A614, Worksop, S80 3PA comprising 73.22 hectares.

In 2021 the government published its document 'Bus Back Better – A National Bus Strategy for England', as part of an initiative to build back better services post pandemic. The strategy requires Local Transport Authorities to implement ambitious bus priority schemes and Bus Service Improvement Plans (BSIPs) delivered through Enhanced Partnerships, which consider how a coherent and integrated network should serve schools, health, social care, employment and other services. This includes requiring the provision of economically necessary bus services, including those which improve people's access to employment. The requirements of the National Bus Strategy should be reflected in the public transport facilities for this site.

Transport Statement & Construction Traffic Management Plan 3.6 – 3.7 states "*3.6 During construction there will be an average of 29 and peak of 43 construction staff working at the site. Parking will be provided on the site during the construction period to accommodate workers. 3.7 Once operational there will be no staff based at the site.*" Any HDC requirement for a Travel Plan/ Statement to support this application should refer to arrangements for sustainable transport access to the site for staff to support local employment and modal share for those without a car.

Bus Stop Infrastructure

There is no bus stop provision within 800 metres of the areas covered by the site. At this time, it is not envisaged that contributions towards local bus stop infrastructure provision will be sought.

Further information can be supplied through developer contact with Transport & Travel Services:

Transport & Travel Services
Nottinghamshire County Council
County Hall
West Bridgford
Nottingham
NG2 7QP
ptdc@nottscc.gov.uk
Tel. 0115 977 4520

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It should be noted that all comments contained above could be subject to change, as a result of any ongoing negotiations between the County Council, the Local Planning Authority and the applicants. These comments are based on the information supplied and are without prejudice to any comments the County Council may make on any future planning applications submitted for this site.

Should you require any further assistance in relation to any of these matters please do not hesitate to contact me.

Yours faithfully

Kathryn Haley
Principal Planning Officer
Nottinghamshire County Council

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