

To the Planning Inspectorate

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Elements Green Trent Ltd (the Applicant) for an Order granting Development Consent for the Great North Road Solar Park (the Proposed Development)

Scoping Opinion: Laxton and Moorhouse Parish Council ('the Council')

1. Introduction

As a Parish Council within part of the proposed development area, we have been asked to submit our views on the Environmental Impact Assessment Scoping Report (SR). The following represent the views of Laxton and Moorhouse Parish Council as to what should be scoped into the eventual Environmental Impact Assessment (EIA) and subject to examination. We are grateful to the Planning Inspectorate for being included as a consultee. However, we would wish to point out that the SR is a highly technical document, and it has been difficult to interpret and understand, without the advice and guidance of a suitably qualified professional, as we do not have the funds to employ one.

Laxton and Moorhouse are two small farming villages in the parish of Laxton and Moorhouse. *“Laxton in Nottinghamshire is unique among the villages of England. It is the one place which has retained the medieval 'open field' system of farming down to the present day”* (University, 2008)

Nottingham University article cited gives some historical background to the village and the open field system. The three fields within the system, Mill Field, South Field and West Field have recently been enclosed within the revised conservation area of Laxton. The edge of South Field, is within 500 m of the proposed development.

2. Site Selection

The council would dispute that The Applicant has followed their own site selection principles (Section 2.2, para 35).

Particularly *“Adopting and approach of using land abutting existing industrial infrastructure”*. There is very little industry, other than agriculture around the proposed development.

“Minimising the use of Best and Most Versatile land”, as this appears to be equal to the best quality land in the district and therefore the most productive land in the district. **The Council proposes that all the land within the proposed development is assessed to ensure that it doesn't meet the criteria for Grade 1 & 2 land as this would immediately preclude the land from any development by the developers Section 2.2 (Para 35) Site Selection criteria and this included within the scoping.**

3. Site Description

This is a massive development covering some 2900 hectares, of mainly good quality farmland, used for food production. In fact, the development covers 4.45%¹ of the 651.4 km² of the Newark and Sherwood district and 1.34%² of the 2160 km² of Nottinghamshire. The proposed development would add to a number of solar farms already in the district, some within the same general area.

4. Scoping

The council would agree to the scoping suggested within the SR and our additional scoping requests have been outlined in the Section 5.

5. Additional Scoping

a. Section 5 Landscape and Visual Impact Assessment

i. Proposed Viewpoints

1. Table 5.1 lists only two viewpoints in Laxton, (VP 11- Mill Field, & 12- Laxton) and one in Moorhouse (VP 13-Moorhouse). **The Council proposes that the viewpoints should be increased to include**
 - a. Various points within all three of the Open fields,
 - b. Locations within the village, including the Grade 1 listed Church and churchyard.
 - c. Laxton Castle Site
 - d. Any other high points within the conservation area overlooking the proposed development
 - e. Moorhouse Church.
2. Consideration should be given to the woodland areas in and around the proposed development, these woodlands could be felled within the 40-year operational phase under woodland management schemes. How would this change the development impact? **The Council proposes that the scope should include detailed assessment of the various woodland management schemes and scope any changes that result.**
3. Table 5.2 in Section 5.8 talks about the distance used to assess whether a property may feel surrounded. **The Council proposes that the scope looks at the options to increase this to a distance mutually agreed with property owners.**

b. Section 6 Ecology, Ornithology and Biodiversity

i. Breeding Birds

¹ Area of proposed development 2900 hectares= 29 km². The Newark and Sherwood District area = 651.4 km². 29/651.4 x 100%= 4.45%

² Area of proposed development 2900 hectares= 29 km². Nottinghamshire= 2160 km². 29/2160 x 100%= 1.34%

1. Local landowners, in partnership with The British Trust for Ornithology have engaged in increasing the local Barn Owl population, for more than 15 years. A program of owl nesting boxes and ringing has seen the population rise over the years, with records showing that the birds move about the local area to breed. Nocturnal birds are overlooked in the survey. (Section 6.5.4.12 Para 227) *“A transect is walked in each section between approximately sunrise and late morning”* **The Council proposes that night-time surveys are included in the scope to incorporate the owl population.**
2. The propose development significantly increases the amount of artificial cover which will prevent birds of prey feeding in the area. **The Council proposes that the scope should include**
 - a. **The effects including the potential rise in small mammals, including mice and other vermin due to the restriction of natural predators.**
 - b. **The effects including the forced relocation of birds and birds of prey, including, but not limited to, kingfishers, owls, buzzards, red kites and peregrine falcons currently in the area.**
 - c. **Any other effects, including the security lighting**
3. Under Section 11 Traffic and Access (para 518) states *“There are anticipated to be only minimal visits to the development per month for maintenance purposes”*. **The Council proposes that the scope should include the effects of wildlife getting stuck in the compound or within the wire fence surrounding the development.**
4. Careful consideration is needed to prevent wildlife emerging onto a highway. **The Council proposes that the scope should look at the creation of un-natural pinch point and corridors caused by the fencing around the proposed development.**

c. Section 7 Hydrology, Hydrogeology, Flood Risk and Ground Conditions

- i. **The Council proposes the scope is extended to cover contamination in the event of an emergency, such as fire. Large quantities of firefighting media could be used which would ultimately enter the local watercourses along with the contaminants and products of combustion.**
- ii. **There have been cases of flooding in residential properties in Moorhouse, the Council proposes that the scope includes the effects of the development, on water levels in the watercourses feeding into Moorhouse Beck to ensure that the amount and speed of water entering the watercourses does not worsen the risk of flooding. In all phases.**

d. Section 8 Cultural Heritage and Archaeology

- i. **The Council proposes that the scope is expanded to include Listing Effects to Grade I designated heritage assets at a distance greater than 2 km from the Order Limits, Effects to Grade I and II designated heritage assets at a distance less than 2 km from the Order Limits.** as this is missing from **Table 8.4**

e. Section 9 Noise

- i. Under Section 3.1 (para 379) *“There are no guidance documents or standards which present study areas for operational noise effects. As such, the assessment of operational effects will include receptors within 300 m of the Order Limits, based on professional judgement and experience on similar projects”.*

The Council proposes that a study is undertaken and included in the scope, to assess the noise and vibration of the panel as they are moved as “tracker modules” and the regime needed to maintain them in good working order.

f. Section 10 Socio-Economical, Tourism and Land Use

- i. Laxton and Moorhouse like many other countryside areas is popular for countryside pursuits, in particular hunting with dogs and shooting. **The Council proposes that the scope includes a study on the impacts of the loss of land for countryside pursuits**
- ii. In Newark and Sherwood recently, there has been a planning application by a Sainsburys chain to build a supermarket on greenbelt land on the edge of Southwell. Planning permission was applied for as the land involved had been part of the route of a proposed bypass around the town. **The Council proposes that the scope includes all the impacts if this precedent is followed by future developers.**
- iii. *“Land that is normally used for agricultural purposes may occasionally be used for other purposes. Provided those other purposes are not the primary reason for the occupation of the land, the land should be regarded as occupied “for the purposes of agriculture when considering a deduction for relief”. HMRC Inheritance Tax Manual.* **The Council proposes that the scope include the effects of losing the status of agricultural land for the land owners in the proposed development and the cost to their estate on death.**
- iv. **The Council proposes that the argument for dual use with sheep grazing here should be backed with scoped in evidence of significant local demand for extra grazing land and what the effect the extra sheep would have on existing sheep farmers and their farm viability. This needs to cover the 40-year operational phase and consider market forces.**
- v. **The Council proposes that the scope should look at the true effects of Agrivoltaic farming with sheep, for example the provision of drinking water is not mentioned.**

- vi. **The Council proposes the scope should also include an assessment of the economic impact the loss of arable farmland and crop production would have during the all phases and a comparison of this to the economic benefits/gains identified. This should be an individual assessment and also a cumulative one, encompassing all other proposed schemes within or in proximity to the order limits.**
- vii. **The Council proposes that the scope should include the impact on domestic property prices in the area since the announcement of the proposed development and how property owners will be compensated for their losses.**
- viii. **The Council feel that the Inspectorate must satisfy themselves that this can be secured as part of any proposal to ensure this proposed mitigation measure to off-set or compensate for the loss of arable land is realistic.**
- ix. **The Council is intrigued on how the developer is “going to improve “the recreational amenity” Section 10.2.4 (Para 484) when talking about PRowS or “provide an alternative route that provides an acceptable alternative to recreational users” Section 10.2.4 (Para 488) and proposes that the scope includes the means to evaluate what an improvement in the PRow looks like and who makes the decision that any alternatives are acceptable.**
- x. **This will be a temporary development and the intention is to return the land back to its original state. The Council proposes that details should be scoped in of how and where the removed topsoil is to be stored and the long-term effect of such storage on its quality.**
- xi. **The Council is concerned that the development might not be decommissioned in a timely manner, due to the company running the development not being able to carry out or complete the task, for what ever reason. The Council proposes that the scope includes whatever measures are required to ensure that the land is returned to its original state.**

g. Miscellaneous Issues

- i. **Section 13.4 Waste** *“The production of waste during the operational phase of the Development will be minimal and is proposed to be entirely scoped out of the EIA.” Section 13.4 (Para 621).* The proposed development will consist of a large amount of grassland, which will require a grass management strategy, which should include an alternative if the sheep option is not viable for part or whole of the operational phase. Either way, a large amount of grass will need mowing and the grass cuttings will be need dealing with, as if left they will rot producing greenhouse gasses, which are counterproductive to the proposed developments green energy ideals, although these are not made clear in the SR. **The Council proposes that the management of 'waste' grass cuttings on-site during the operational phase should be scoped in.**

ii. Section 13.1 Glint and glare

1. **The Council proposes that the assessment should vary the receptor height to account for all road users and various heights to accommodate the various agricultural machines that work on the land surrounding the proposed development.**
2. Section 13.1.2 (Para 583) lists some of the surrounding airfields, but misses Retford Gamston Airport, which is quite significant in the area and runs a number of training flights over the area with both fixed wing and helicopters. In addition, the Lincs & Notts Air Ambulance regularly flies over the proposed development. **The Council proposes that the scope is expanded to include these omissions and that both establishments are consulted.**
3. Similarly, the receptor height must be varied when assessing the potential effects on some users of the A1, A46 (especially LGVs and coaches) and the East Coast mainline. The road and rail height vary along the edge of the proposed development this would not be possible with an office-based assessment. Particular care should be taken around signage and slip roads to ensure that road safety is not compromised; and signage and signals for rail safety. **The Council proposes that the scope includes a widened assessment of the impact of Glint and Glare on the local major transport infrastructure.**

h. Section 15 Items Scoped Out of the EIA

- i. **Ecology and Hydrology.** All Laxton Sykes are not separated by “*extensive agricultural landscape*” and do share hydrological connectivity (Table 15.1). **The Council proposes that this is scoped.**

The Council submits the above for consideration.

Laxton and Moorhouse Parish Council on behalf of the parishioners of Laxton and Moorhouse

Works Cited

University, N., 2008. *Laxton: Living in an open field village*. [Online]

Available at:

<https://www.nottingham.ac.uk/manuscriptsandspecialcollections/learning/laxton/introduction.aspx>

[Accessed 29th November 2023].