GREAT NORTH ROAD SOLAR AND BIODIVERSITY PRE-EXAMINATION CONSULTATION

Sutton on Trent Parish Council would like to register comments to the pre-examination stage for the proposed solar photovoltaic array generating station, battery energy storage system and grid connection infrastructure, with a maximum generation capacity of 800MW.

Sutton on Trent Parish Council submitted a written response to the phase two Public Consultation (9th-20th February 2025) and those comments submitted previous remain consistent and reflect the stance of the Parish Council, whom maintain a neutral stance on the proposed development.

The previous comments are as follows and reflecting the local key issues applicable to the development proposals;

- Flood prevention and flood mitigation to ensure current flooding does not increase;
- Notwithstanding the name change, concerns are still raised regarding the impact the proposals will have on existing wildlife, flora and fauna;
- The need for a range of substantial landscaping to mitigate visual impact from the commencement;
- The tension between food security and energy developments resulting in loss of BMV land;
- Justification for the proposal against alternative sites; and
- Clarification on what will happen at the decommissioning stage;

Flooding

Flooding is the primary concern of Sutton on Trent Parish Council.

Sutton on Trent is a large village conurbation with a long and continued history of flooding roads and properties, most recently during named storms in 2024. The village has benefited from flood prevention enhancements but remains under the continued threat and reality of flooding.

Sutton on Trent is in the unfortunate position of being the last conurbation before the River Trent, with water descending from a vast geographical area, a network of water courses and runoff into the small village dyke system, which includes areas within the subject application.

Capacities are at their peak already within the village dyke system, and concerns are raised regarding the potential increase in flooding that could occur as a result of surface water runoff and alike from such a large expanse of panels, covering the green fields that provide a natural filtration of surface water.

Put simply, Sutton on Trent cannot cope with any increase in additional water entering the village. Any development must ensure that flooding will not be exasperated and ideally modelling undertaken that goes over and above current planning requirements to ensure mitigation required provides security to those low lying villages that further flooding will be prevented.

A further concern relates to possible contaminants resulting from the proposed construction traffic (oil and diesel), ongoing cleaning and maintenance of the sites involving the use of pesticides, herbicides, fertiliser and weed control once operational, as these could all add to the issues already experienced in the poor water quality in the area due to surface water runoff from the Site, naturally discharging into these ordinary water courses on the site boundaries.

Any fields that are within Flood Zone 3 should be precluded from development.

Biodiversity

Whilst it is acknowledged that the solar PV area of the development is approximately 1,025 hectares (2,533 acres) or the proposed development of c.1765 hectares (4,361 acres), only c.800 acres are to be denoted for biodiversity enhancements. This equates to approximately 18.34% of the total Site and is somewhat disappointing given the name change to include 'Biodiversity Park' in the development description.

The series of open areas proposed for enhancements must be coherent and planned to optimise any benefit to the wildlife. Management of these areas needs to be secured during the life of the development but it is not understood what happens to these areas once the Site is decommissioned. Once established, the loss of the sites would once again have a greater impact on the wildlife and should be safeguarded in perpetuity.

These areas should become features in their own right, complementing the permissive footpaths with seating provided as part of a nature walk.

Landscaping

The scale and magnitude of the solar farm, including infrastructure comprising site storage facilities, perimeter fencing, and the need for CCTV columns, will cumulatively impact the character of landscape areas.

The fact that a Landscape strategy is required to screen the development demonstrates that there will undoubtedly be harm to the landscape character. The scale and broad spread of development with associated infrastructure would result in an urbanising form of development that does not achieve the policy requirements to conserve the area's landscape character. The area would be highly susceptible to the changes, and sensitivity will be higher in some locations and would remain so for at least 10 years (25% of its operational life) whilst any landscape mitigation establishes and matures.

The planting of an additional 60,000 trees and the laying of 50KM of hedgerows is welcomed. However, to provide mitigation from the commencement of the proposals, there needs to be a mix of different tree standards and not solely reliant on the planting of young saplings. In key viewpoints, more substantial trees should be planted from the offset.

Loss of Agricultural Land

The Site is acknowledged to consist of a mix of grade 3a and 3b land qualifying as "best and most versatile" land (BVML). NPPF (2024), paragraph 187, states that planning policies and decisions should recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services—including the economic and other benefits of the best and most versatile agricultural land and trees and woodland.

Written Ministerial Statement (WMS) 'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land' was issued on 15 May 2024. The Statement advises that food security is an essential part of National security. Under 'Protecting the Best Agricultural Land' it states:

The new National Policy Statement published in January 2024 makes clear that "applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has

been shown to be necessary, poorer quality land should be preferred to higher quality land, avoiding the use of "Best and Most Versatile" agricultural land where possible." The Government in Powering Up Britain: Energy Security Plan clarified that while "solar and farming can be complementary" developers must also have "consideration for ongoing food production."

The Site Selection has been based on the convenience of being close to the decommissioned power plant of Staythorpe. However, the cumulative impact of the solar array needs to be adequately assessed and justified why this Site has been chosen over other land of lesser quality and how other land has been discounted in accordance with the NPS EN-3, which is clear that Applicants should seek to minimise impact on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and should look to use land and areas of poorer quality.

If sheep grazing was permitted, it is only likely to be under the panels as other areas outside of the panels are to provide biodiversity enhancements and are not likely to be compatible with grazing. The grass beneath the panels will also likely be of low quality due to the lack of sunlight reaching the ground in these locations due to the nature of the development proposals. The solar panels are likely to be located approximately 0.6m from the ground level at its lowest level, which severely limits the ability for livestock and other associated wildlife to utilise the Site for foraging due to the perimeter fencing.

40 years may be termed 'temporary', but 40 years of the field being out of food production could be longer if an application for repowering and life extension of the solar farm is submitted. No weight should be given to the possibility of grazing as the Site will most likely be lost to agricultural use without any agreements in place to facilitate grazing of the land.

Decommission

Once all the wildlife and biodiversity sites are established, it is unclear what will happen to these areas. The fact that weight is given to the temporary nature, although 40 years is half of a person's lifetime, significant weight is given to the creation of habitats and resting of the BMV land.

As technology advances, so does the lifetime of the solar arrays. NPPF 2024, Paragraph 166 (c) even states that "in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site". It seems unlikely that the Site will ever return to agricultural use and will be a permanent structure for many years far greater than the 40-year period stated.

Concluding Comments

It should be noted that flooding continues to be the primary concern of Sutton-on-Trent Parish Council. It is, however, clear that the Proposals will change the character and appearance of a series of arable fields, typical in this rural landscape, to an isolated industrial infrastructure development that would be visually dominant within the surrounding area and blight the outlook of those residents closest to it.

The Agricultural Land Classification report should be informed by soil analysis, and we expect the application to be submitted with a suitable Site Selection report, with the cumulative impact of solar array properly assessed and justified for loss of BMV land. It should clearly demonstrate why this Site has been chosen over other land of lesser quality and how other land has been

discounted in accordance with the National Policy Statements, which directs development to land and areas of poorer quality.

There needs to be a landscape strategy that provides enhancements from the outset, with planting of mature trees to assist with assimilating the development from an early stage, whilst alleviating the harms to the outlook of the closet residents.

If the proposal is to be described as a 'Biodiversity Park', the biodiversity enhancements on the Site should go further than using a total of 18.34% of the Site. The existing wildlife will be displaced and habitats removed during the construction phase. The areas denoted for biodiversity should be implemented at the earliest stage of the construction if granted.

The permissive footpaths need to be managed, and if the Site is to be promoted as a ‘Biodiversity Park’ further considerations to make more of a nature trail through/around the park should be secured so that existing and future residents can benefit from these features.

The Parish Council’s neutral stance remains.