



TOWN-PLANNING.CO.UK

Great North Road Solar and Biodiversity Park Project EN010162

Preliminary Meeting
Wednesday 26 November 2025

Written Submission of JPAG
Interested Party Reference [REDACTED]

TOWN-PLANNING.CO.UK as agent for JPAG

Executive Director - Anthony Northcote HNCert LA(P), Dip TP, PgDip URP, MA, FGS, MIOl, MCMI, MRTPI
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The Geological Society



UKELA

UK Environmental Law Association

JPAG

1. JPAG (Joint Parishes Action Group) is an alliance of Parish Councils and Parish Meetings who have come together to respond to the Great North Road Solar and Biodiversity Park, including through the production of this representation in objection to the Great North Road Solar and Biodiversity Park (GNR).
2. JPAG formally covers 14 Parishes in Newark & Sherwood and involves the following bodies:
 - Bathley Parish Council
 - Carlton on Trent Parish Council
 - Egmanton Parish Meeting
 - Kneesall, Kersall & Ompton Parish Council (3 Parishes)
 - Laxton & Moorhouse Parish Council
 - Maplebeck Parish Meeting
 - North Muskham Parish Council
 - Norwell & Norwell Woodhouse Parish Council
 - Ossington Parish Meeting
 - South Muskham & Little Carlton Parish Council
 - Weston Parish Council
 - Winkburn Parish Meeting
3. In addition, although not formally members, JPAG has worked in collaboration with Averham, Kelham & Staythorpe Parish Council (*who cover Averham, Averham Park, Kelham & Staythorpe*) and Upton Parish Council.
4. JPAG has also collaborated with the Norwell Solar Farm Steering Group, (whose primary focus is the Foxholes Solar Farm application). In relation to the GNR project, they are focussing on climate change impact / CO² and the operating capacity of the scheme. JPAG is also liaising with Say No to One Earth Solar Farm, the community group on NSIP project EN010159. JPAG has also engaged with Barnby in The Willows Parish Council who are concerned about the newly announced 100MW solar/BESS scheme just to the east of Newark.

Preliminary Meeting

5. It is noted that the Rule 6 letter (PD-005) states on page 2 that: *“The preliminary meeting should be completed before 1.00pm on Wednesday 26 November 2025. However, a reserve*

period has been scheduled for 2.00pm on the same day to allow for the meeting to be resumed in exceptional circumstances...” However, the Issue Specific Hearing 1 is programmed for 2.00pm on Wednesday 26 November 2025; so, we are unclear as to what will happen to Issue Specific Hearing 1 if the preliminary meeting were to need the stated reserve period.

6. The agent for JPAG will be attending the preliminary meeting and will expand upon the issues set out in Event Participation Form as those JPAG wishes to raise. This written submission contains an outline of the issues to be raised and expanded upon at the preliminary meeting.

Item 3 - Assessment of Principal Issues

7. JPAG is of the view that scale should be a principal issue. Section 104 of the Planning Act 2008 sets out what the Secretary of State must have regard to in making his or her decision where a relevant NPS is designated. This includes any matter that the Secretary of State thinks is important and relevant to the Secretary of State's decision. It also sets out that whether the adverse impact of the proposed development would outweigh its benefits is a relevant consideration.
8. Examining Authorities make their recommendations within the framework provided by the National Policy Statements (NPSs), as required by the Planning Act 2008. NPS-EN1 (the Overarching NPS for energy) refers to scale as being relevant to assessment undertaken by the applicant. NPS-EN1 also identifies scale as being a relevant consideration in terms of environmental gains, impacts on heritage, transport impacts etc. and how reduction in scale may be a method of mitigation.
9. The sheer overall scale of the development is clearly an issue of concern in many relevant representations and as such it is considered to be an appropriate matter that should be considered by the Examining Authority.
10. Paragraph 2.10.17 of NPS-EN3 (NPS for renewable energy infrastructure) specifically refers to scale in relation to solar and impacts particularly in rural areas.

Item 4 - Examination Timetable

11. There is considered to be no justification for seeking to undertake the examination in 5 months rather than the 6 allowed for by law. It must be asked whether the applicant

(Elements Green Trent Ltd) has chosen to pay the Planning Inspectorate to avail themselves of the fast-track service?

12. Christmas/New Year, February half-term and Easter fall within the suggested 5-month examination period. This reduces further the available time that participants have to effectively participate in the process. JPAG is concerned that the suggested timetable will not allow the Examining Authority sufficient time to adequately and effectively assess the project.
13. Great North Road Solar and Biodiversity Park (GNR) is not the only local solar NSIP being examined, it is noted that the One Earth Solar Project (EN010159) examination is scheduled to take the full 6 months from the preliminary meeting on the 8 July 2025 to a close of examination to occur on the 8 January 2026.
14. It is noted that the One Earth Solar project is geographically smaller than the GNR project; it is of a smaller scale; it has 30% less relevant representations; it has 43% less application documents; and a similar number of additional submissions.
15. It is also noted that the other NSIP solar proposals linked to the power station grid connections in Nottinghamshire at West Burton, Cottam, Tillbridge and Gate Burton have all taken the full 6 months to be examined. It is therefore illogical that GNR as the largest of all these NSIP projects can reasonably be expected to adequately and effectively examined in less time.

Item 4 - Examination Timetable

16. Clarity over when unaccompanied site inspections are likely to be undertaken would be appreciated. Also, clarity over how the Examining Authority will choose which suggested site inspections are to be accompanied would be appreciated.
17. The requirement to have submitted suggestions for site inspection locations by Procedural Deadline A seems somewhat early; particularly given that this pre-dates the procedural meeting. Accompanied site inspections are programmed for February 2026, almost 3 months away, so there appears to be no immediate imperative to resolve this matter.
18. It is noted that Annex F incorrectly lists the accompanied site inspections for February 2025 and not February 2026.

Item 6 - Other Matters (Concerns Regarding Adequacy of Consultation)

19. Paragraphs 13 to 39 of our relevant representation (RR-101) sets out the detailed concerns regarding the adequacy of consultation. In particular the [REDACTED] manner in which the consultation has included material on aspects such as NG+ that do not form part of the DCO application. [REDACTED]
[REDACTED]. The s51 advice issued by the Inspectorate is not listed in the Examination Library.
20. In the s51 Meeting held on 26 February 2025 it is noted that specific comment was made of the need to clarify what is part of the DCO scheme being consulted on with regard to NG+ elements. That advice has not been heeded and the nature of the way that consultation has been undertaken has been misleading and as a consequence the DCO application should not have been accepted for examination.
21. We will also refer to the consultation documents APP-296 to APP-314.
22. It is also pertinent for the Examining Authority to note that the applicants have also produced and circulated two newsletters in March 2025 and June 2025. These were called 'Natural Flood Management (NFM) Update #1 Project update - Elements Green's (EG) Commitment to Pre-existing Flooding Alleviation' and 'Natural Flood Management (NFM) Update #2 Project update - Elements Green's (EG) Commitment to Pre-existing Flooding Alleviation'. These are included as an Appendix to this statement. These are on the GNR website and are branded as GNR although they relate to matters which are not part of the DCO application and have not been considered as associated or allied projects in any of the assessments.

Appendix

Natural Flood Management (NFM) Update

#1 Introducing Elements Green's Commitment to Pre-existing Flooding Alleviation



Thank You for your Engagement

We are at the end of the statutory consultation period for the **Great North Road Solar and Biodiversity Park (GNR)** and want to take a moment to thank everyone who attended our nine consultation events. Your insights and feedback have been invaluable and will help further shape the project.



Investing in Flood Mitigation

Many of you visited our dedicated **Flood Information** drop-in table and suggested that we give regular updates on progress regarding our commitment to supporting areas with pre-existing flooding, recognising that certain areas within the GNR region have faced persistent flooding challenges for many years.

While this issue exists independently of the proposed Great North Road Solar and Biodiversity Park, we are working with the Trent Rivers Trust (TRT) and our hydrologists to develop **Natural Flood Management (NFM) solutions**, in order to help alleviate existing flooding issues. These measures are being pursued **separately from the GNR Development Consent Order (DCO)**, with technical solutions being developed, and planning applications to be submitted, ahead of the DCO decision.

This investment, provided at no cost to the local communities, is part of our commitment to delivering meaningful improvements for those who live and work in the region.

Our Mission

By prioritising flood resilience alongside our renewable energy projects, we are ensuring that our presence in the region contributes positively, not just to the UK's clean energy future, but also to the well-being of the people who call this area home.

Together, we are investing in solutions that make a real difference - today and for generations to come.



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Natural Flood Management (NFM) Update

#1 Introducing Elements Green's Commitment to Pre-existing Flooding Alleviation



Project Summary – Q1 2025

Local Partnerships Established:

We are working with the Trent Rivers Trust (TRT) and our hydrologists to identify the most effective flood mitigation strategies for key locations in the identified Parishes of: Maplebeck, Egmanton, Sutton-on-Trent, Carlton-on-Trent, Weston/Grassthorpe, South Muskham and Kelham. Grassthorpe has been included as a new addition following recent consultation.

Initial Site Assessments Complete:

Several areas have been surveyed to determine where interventions such as bunds, offline ponds and tree planting could be most beneficial. Whilst desk-based assessment continues in other areas, ground-truthing of those initial NFM measures is now underway.

This has involved the installation of water-level monitoring equipment placement in Maplebeck thanks to helpful advice from local Parish representatives and the NCC.

Get in Touch

We will continue to provide updates as we progress through planning and implementation. If you have any questions or would like to share local insights, please contact us:

info@gnrsolarpark.co.uk
with the subject line:
FAO Natural Flood Management Team

Together, we're taking proactive steps to support flood resilience in your community.

Next Steps

Detailed Design of NFM Measures in Progress - Based on initial desk-based studies and ground-truthing exercises, we are preparing the relevant information to establish material measures in priority areas. These may well look similar to the attached images, which come from projects that TRT have previously assisted with.

Early-Stage Engagement with Landowners - Discussions are underway with key landowners to facilitate implementation on affected sites.

Further Ground Truthing - of all desk-based findings to be completed from April.



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Natural Flood Management (NFM) Update

#2 Project update - Elements Green's (EG) Commitment to Pre-existing Flooding Alleviation



Project summary – Q2 2025

Additional areas added

We are working with the Trent Rivers Trust (TRT) and our hydrologists to identify the most effective flood mitigation strategies for key locations in the identified Parishes. Not all of these will subsequently be suitable for NFM, although desk-based studies are underway for all.



This brings the full list to: Maplebeck, Egmonton, Sutton-on-Trent, Carlton-on-Trent, Weston/Grassthorne, South Muskham, Kelham, Laxton & Moorhouse and Caunton (recent consultation with local interested parties, has led to the addition of Laxton & Moorhouse and Caunton).

Establishing Landowner funding

The TRT agricultural team have been providing assistance on the potential funding which could be available to landowners hosting NFM measures, including government subsidies for land which may be less productive.

Code of best practice

Land management is one of the most impactful elements of the NFM toolkit – particularly in maintaining healthy soils to encourage infiltration and reduce runoff. EG and TRT are currently drafting a short, practical guide that reinforces these principles from an NFM perspective. It will also serve as a signposting resource for related areas such as:

- Soil management plans
- Nutrient management plans
- Livestock manure management

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There's been ongoing EG and TRT engagement with Parish council members, including on-site meetings with landowners.

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Natural Flood Management (NFM) Update

#2 Project update

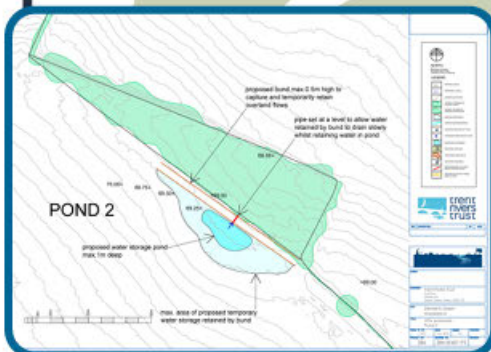
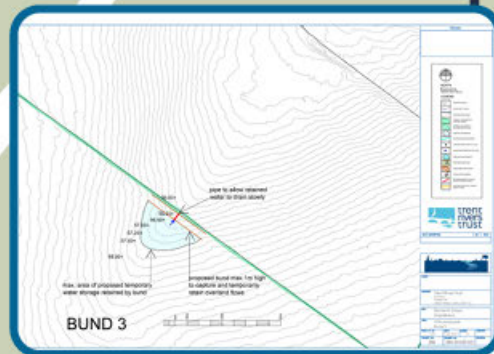
Detailed design works underway

Technical designs have been prepared for Maplebeck, Sutton-on-Trent, Carlton-on-Trent and Weston.

Opportunities for bunds and offline ponds, as well as wider restoration such as flood plain reconnection have been identified in these areas, subject to landowner engagement and agreement of relevant permissions (all take time).

Bunds are low earth mounds up to 1 meter (m) height, which temporarily retain water and allow this to slowly disperse. The example to the right would be 30m long, with a 225 mm pipe through the centre, which will drain into the adjacent ditch following heavy rain.

- This could store up to 120,000 litres of water, enough for 1,500 baths (80 litres).



Offline storage ponds are disconnected from the watercourse and are designed intercept and store overland flow during high periods of rainfall.

Over time stored water evaporates or infiltrates through the soil. The example to the left would be approximately 20m long x 10m wide, with a maximum depth of 1m in the centre.

- This could store up to (7.5mx20mx0.75m) 112,500 litres of water or 321,428.57 cups of tea (350ml).

Construction of a typical bund or offline pond would be 2-3 days' work for a team of 3 with an 8 - 12 tonne excavator.



Natural Flood Management (NFM) Update

#2 Project update

RSPB Partnership

We have been engaging with the RSPB to highlight opportunities for ecological enhancement which go alongside the NFM measures. These include benefits to the following species.



- **Ground nesting birds** – such as skylark, grey partridge and reed bunting – which benefit from the developing grassland structure and seasonal grazing patterns that support nesting and foraging.
- **Invertebrates** – including pollinators and aquatic species that rapidly colonise new habitats like ponds, where species such as great diving beetles, water scorpions and dragonflies thrive.
- **Amphibians** – such as smooth newts and common frogs, which are supported through the creation of diverse pond habitats that also benefit birds and predators further up the food chain.
- **Wetland and farmland birds** – including lapwing, starling and yellow wagtail, which rely on wet soils and re-wetted grassland for invertebrate-rich foraging and nesting material.

Next Steps

Detailed Design of NFM Measures in Progress - based on initial desk-based studies and ground-truthing exercises, to ensure NFM measures meet planning guidelines.

Submission of planning applications - following landowner acceptance and agreement of relevant permits. Designs prepared for bunds and ponds in multiple areas, whilst wider restoration such as wetlands, may be able to follow in a longer-term approach.

Continued landowner engagement - discussing how landowners can host these schemes, including funding which may be available for support.

Longer term studies/applications - channel modifications and wetlands.

On-going Ground Truthing - commenced from April 2025. This provides evidence of application of techniques.



Natural Flood Management (NFM) Update

#2 Project update

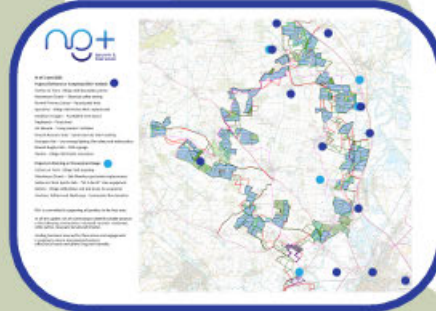
GNR Good News - Round Up

NG+ Community Fund

11 projects now funded, 6 more in planning.

Recent examples:

- Moorhouse Church: Electrical safety work
- Weston Village Hall: Toilet renovation
- Ossington Hut: Low-energy lights & smoke detectors
- Explore more at www.NGplus.uk



Praise for Nature-Positive Energy

Natural England praises GNR as a blueprint for how to integrate nature, energy and community. We're now working on a formal collaboration, building on partnerships with RSPB, Sherwood Forest Trust and others.

EG Academy – Skills for a Green Future

137 learners – 180 CPD courses taken.

Free to all – topics include technical design, planning and development.

Explore more at www.egAcademy.co.uk

Researching a Resilient Future

Two PhD titles developed in partnership with Nottingham Trent University:

- Smart solar-to-food systems
- Carbon and biodiversity metrics for solar parks

Get in Touch

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