

# **Norwell Solar Farm Steering Group**

**Application by Elements Green Trent Limited for an Order Granting  
Development Consent for the Great North  
Road Solar and Biodiversity Park – project ref. EN010162  
Unique Number - [REDACTED] ( Our ref: NSG/5)**

**Deadline 1. Oral Submissions. ISH/1 and Open Floor Hearing  
27/11/25**

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## **1 Public Benefit**

- 1.1 The Group have already submitted the background papers for their arguments regarding greenhouse gas emissions and public benefit under our references NSG1-4. The Applicant has been supplied with copies as requested by the Examining Authority. On the afternoon session of the ISH/1 the Group made comments regarding the Applicant's assessment of generating capacity and their methodology and accuracy of greenhouse emissions calculations.
- 1.2 Figures regarding the targets in the Clean Power 2030 Action Plan for BESS capacity were mentioned in the hearing. These were drawn from pages 2 and 3 of the Group's report reference NSG/2. The figures on those pages (and therefore also the Executive Summary) require a slight amendment as the unit of measurement was shown as GWh whereas it should have been just GW. It is wished that the Examining Authority note this slight change.
- 1.3 To eliminate the need for another additional report, the capacity figures mentioned in the hearing have now been updated in the [Renewable Energy Planning Database \(REPD\)](#) and the [Transmission Entry Capacity \(TEC\) register](#). The national target for 2035 is 28.7GW.

The October REPD shows:

- 6.2GW of battery storage currently under construction.
- 60.7GW of battery storage with planning permission or a DCO, awaiting construction.

The TEC Register shows, as of 2<sup>nd</sup> December 2025, 25.4GW of battery storage awaiting a planning determination, and 347GW in scoping.

- 1.4 Renewable UK, a trade association for developers, have made an

assessment of where the UK battery storage is, as at September 2025. Their publication\* states that the current UK operational battery storage is 6.8GW.

- 1.5 Though in attendance, no verbal comments were made by the Group in the Preliminary Hearing. Group members J Hobson, and P Williams made verbal comments during the morning ISH/1 session and the Open Floor Hearing on the subjects of mitigation versus enhancements, sequential cumulative effect, ethical sourcing and missing technical specifications. Below are the summaries and background for those comments.

## 2 Mitigation versus enhancements

- 2.1 The following is an extract from the Group's Statutory Consultation submission to the Applicant ( GLVIA3- *Guide to Landscape and Visual Impact Assessment Version 3<sup>rd</sup> Edition*, published by the Landscape Institute):

*"GLVIA3 para. 3.39 explains that enhancement **"is often referred to incorrectly as an outcome of proposed mitigation measures"** as is the case here. Clearly, double-counting mitigation measures as enhancements has implications for judgements about levels of effects, since real enhancements / scheme benefits could potentially outweigh levels of harm. Because the PEIR and supporting documentation has erroneously assumed that landscape / visual mitigating measures can be double-counted as landscape / visual enhancements, it has overestimated levels of beneficial effects, and underestimated levels of adverse effects."*

And later in that submission:

*"With regard to 3.7 above, GLVIA3 makes it clear throughout- effects on character and views must be assessed separately, especially because effects on character can occur even if there would be no views of the change. If landscape character and visual effects are conflated, then levels of effects on character are assumed to be lower than they would actually be."*

*The Group would wish that the Environmental Statement (ES) corrects these elements of LVIA planning assertions. The Council is sure that the Applicant would wish to do so, especially as they state*

[REDACTED]

*that their Landscape and Visual technical lead is currently interim chair of the GLVIA3 panel which is responsible for LVIA guidance and best practice on behalf of the Landscape Institute."*

- 2.2 The Applicant's approach on this point in various documents is summarised in Table 7.4 of Chapter 7 Landscape and Visual Impact Assessment [APP-050](#):

*"As well as providing visual mitigation, proposed tree and hedgerow planting would enhance the existing landscape fabric and character and contribute to the 'landscape condition/quality' aspect of landscape value."*

- 2.3 The sentence -*"Visual mitigation would be provided, including tree and hedgerow planting, to enhance the existing landscape character."* is used constantly in Chapter 18 Recreation [APP-061](#).
- 2.4 It is the Group's position that the Applicant has consistently double counted mitigation measures as enhancements in order to exaggerate the scheme benefits.

### **3 Sequential Cumulative Impact Assessment.**

J Hobson for the Group described the impact on residents of the village. Though not visible from inside the village, there was an impact when villagers drove in and out the village. Journeys south to Southwell would include going past numerous panelled fields, as would journeys west to Ollerton, north to Sutton on Trent and Carlton on Trent. The Group objected to the industrialisation of the open countryside around Norwell and the effect it would have on those travelling to and from the community.

### **4 Request for More Detailed Specification.**

- 4.1 In the Open Floor Hearing, P Williams requested that material specifications be updated by the Applicant. Even though a third of the field acreage originally earmarked for panels had been removed

from the original design, none of the construction material quantities had changed.

- 4.2 On a related point, it was requested that more detail be provided for specifications for the cable trenches. The Figure 5.9 Illustrative Cable Trench Cross section [APP-088](#) showed all the various examples as under 2m wide. Paragraph 42 of Chapter 05 Development [APP-048](#) describes trenches with a width of up to 12m. The Applicant has verbally stated that in some rare cases, there might be a need for trenches up to 20m wide.

## **5 Ethical Sourcing**

- 5.1 [REDACTED] stated that he had been told by a senior manager for the Applicant that the Company had a [REDACTED] Statement. It was queried whether this could be made available.
- 5.2 An extract from the Applicant's website was read out. Their website states:-

*"We implement our ESG values and maintain responsible business practices through our suite of ESG Policies, which include clear principles and guidelines on... Fair Employment Practices, Labour Conditions, Human Rights..."*

*"We are committed to running our business in accordance with the Universal Declaration of Human Rights, International Labour Standards and the United Nations Global Compact Principles, amongst other international standards."*

- 5.3 Whilst it was accepted that it was probably too early to choose the panel supplier, given the findings of Professor Laura Murphy at Sheffield Hallam University, the Applicant was asked whether they had decided which panel suppliers should not be used. This was asked as 2 of the 3 Chinese companies mentioned in the Lifecycle analysis [APP-285](#) were found to have links to [REDACTED] (Trina Solar and Canadian Solar). It should be noted these companies were only mentioned as a source for specifications, not as a short

list for suppliers.

December 2025.