

Written Representation – Deadline 1

To: The Examining Authority – Planning Inspectorate

Project: Great North Road Solar and Biodiversity Park

Applicant: Elements Green

PINS Reference: EN010162

Deadline: 10 December 2025

From: James Gamble County Councillor – Sherwood Forest (“the Councillor”)

1. Introduction

This Written Representation (WR) is submitted in accordance with the Examination timetable for Deadline 1. It provides evidence and commentary regarding Best and Most Versatile (BMV) agricultural land in relation to the proposed development of the Great North Road Solar and Biodiversity Park.

This submission complements the Local Impact Reports submitted by Nottinghamshire County Council and Newark & Sherwood District Council, with a focus on errors and omissions in the BMV land assessment, the cumulative assessment in the Environmental Statement (ES), and the local agricultural and economic impacts, including those affecting the Newark Sugar Factory supply area.

Accurate BMV assessment is a material planning consideration under NPPF paragraphs 174–175, and the Examining Authority (ExA) must rely on corrected data to determine the true impacts of the proposed development.

2. Summary of Key Concerns

1. During Issue Specific Hearing 1 (27 November 2025), Elements Green acknowledged numerical errors in ES Table 17.21, including the omission of 211 ha of BMV land at Beacon Fen.

2. The One Earth NSIP was not included in the cumulative BMV assessment.
3. Correcting these errors increases the cumulative BMV total from 2,350 ha to 3,222 ha, an increase of 872 ha, or 37%, which materially affects the assessment of cumulative effects.
4. Accurate BMV data is essential to:
 - Ensure compliance with NPPF policies
 - Safeguard high-quality agricultural land
 - Assess cumulative significant effects properly
 - Support local planning policy considerations

3. Detailed Issues

3.1 Significance of Corrected BMV Total

- The Councillor (James Gamble) considers that the corrected cumulative BMV total (3,222 ha) represents a significant adverse cumulative effect, particularly in Newark & Sherwood District.
- The Applicant maintains that cumulative effects remain “not significant.”

3.2 Local Agricultural Impacts – Newark Sugar Factory

- The Newark Sugar Factory relies on a 25–30 mile radius of high-quality arable land for sugar beet supply.
- Loss of BMV land within this radius could:
 - Reduce the area available for beet cultivation
 - Displace cropping and disrupt rotation schedules
 - Increase transport distances and costs for farmers
 - Reduce operational efficiency at the factory

3.3 Cropping and Land Use Implications

- The affected BMV soils typically support high-yield arable crops such as wheat, barley, sugar beet, and oilseed rape.
- Displacement of cropping due to solar park development could affect soil fertility, productivity, and long-term farm viability.
- The cumulative loss of 872 ha (37%) of BMV land within the district is a significant proportion of local high-quality farmland.

3.4 Economic and Community Impacts

- Loss of BMV land could reduce farm income, which in turn affects local spending, employment, and supply chains.
- The sugar industry contributes to direct employment on farms and at the factory, as well as indirect jobs in logistics, processing, and storage.
- Displacement and loss of BMV land could therefore have wider socio-economic impacts in rural communities.

3.5 Logistics and Supply Chain Considerations

- Increased displacement of sugar beet production would result in:
 - Longer transport distances to the Newark factory
 - Higher fuel costs and associated carbon emissions
 - Greater risk of spoilage or delivery delays, given the time-sensitive nature of beet harvesting
- These factors demonstrate that the local significance of BMV land loss extends beyond on-farm effects to the regional processing economy.

3.6 Adequacy of Cumulative Assessment Methodology

- The omission of One Earth NSIP and numerical errors at Beacon Fen undermine confidence in the cumulative assessment methodology.
- While the Applicant maintains the methodology is acceptable once corrected, the ExA should require a fully verified cumulative assessment to ensure conclusions are robust.

4. Requests to the Examining Authority

The Councillor (James Gamble) respectfully requests that the ExA require the Applicant to submit:

1. Corrected ES Table 17.21 including:
 - One Earth NSIP
 - Corrected Beacon Fen figures
 - All relevant NSIPs within the assessment radius
 - Updated total BMV calculations
 - Revised interpretation of significance
2. Revised cumulative significance assessment reflecting the corrected BMV baseline of 3,222 ha.
3. Local agricultural impact assessment, including:
 - Impacts on the Newark Sugar Factory supply area
 - Displacement of cropping and implications for rotation schedules

- Transport and logistics considerations
 - Local economic effects of BMV land loss
4. QA and verification processes, explaining:
- How the errors occurred
 - What verification steps were undertaken
 - Measures to prevent future inaccuracies

5. Conclusion

The cumulative loss of BMV land is materially significant, with potential consequences for:

- Local agriculture and farm income
- Sugar beet production and the Newark Sugar Factory supply chain
- Cumulative planning and environmental assessment under the ES
- Socio-economic effects in rural communities

The Councillor (James Gamble) respectfully requests that the ExA require the Applicant to submit corrected BMV calculations, a revised cumulative assessment, and evidence of QA processes before conclusions in the ES are relied upon.

Yours Sincerely,

James Gamble County Councillor – Sherwood Forest

Date; 10th December 2025



James Gamble MSc. Biodiversity Conservation