

Great North Road Solar & Biodiversity Park – EN010162

Carlton-on-Trent Parish Council – Reference number: [REDACTED]

Response to First Set of Questions - 16.1.2026

Carlton-on-Trent Parish Council have responded to questions:

- Q 1.1.9 Planning Benefits
- Q 4.1.10 Consideration of Mitigation Measures
- Q 11.1.12 Cumulative landscape and visual assessment
- Q 13.1.6 Sustainable drainage system design

Q 1.1.9 Planning Benefits

a) Renewable Energy

Carlton-on-Trent Parish council has reviewed the figures provided by Elements Green and firmly believes the projection to provide energy for 400,000 homes is wrong. This belief was confirmed after discussion with several other authorities, including neighbouring councils and a retired associate of the council who works for the National Grid. No one has ever provided us with a scenario where these figures could be achieved.

Carlton-on-Trent Parish Council support and endorse the findings of Norwell Solar Farm Steering Group.

b) Biodiversity net gain (BNG)

The principle of producing renewable energy to reduce our reliance on fossil fuels and offset carbon emissions requires an in-depth analysis of the carbon that will be produced during production and installation of the project, and then an accurate calculation for BNG can be deduced. The data provided by the applicant does not stand up to scrutiny.

Again, we find ourselves endorsing the findings of Norwell Solar Steering Group as a true reflection of carbon emissions for the creation of this project. BNG cannot be calculated until this base figure is accurately assessed.

c) Economic, Educational and sustainable benefits

Economic: Carlton on Trent Parish Council challenge Great North Road Solar and Biodiversity Park's statement that the Development will deliver, Economic, Educational and Sustainability benefits. Claims like job creation and economic output are described as "significant" or "moderate beneficial" but lack detailed numbers, timelines, or metrics for local uptake. The applicant argues that jobs will be created during the construction phase, these jobs are temporary, low-skilled or semi-skilled, and on most other schemes they have frequently been filled by non-local or transient labour rather than residents of the host communities.

We are aware that specialist companies are currently used by the applicant and in all probability, they will continue to use those. No assurance, written or otherwise, has been given by the applicant that they will use local labour. Following construction, the labour requirements will be significantly reduced and will not compensate for the loss of livelihood to the many farm labourers and associated business that rely on the current farming mechanism. We cannot see any short or long-term economic benefits.

Educational: Apprenticeships and other forms of job training will not exist to residents unless locals are recruited, and as previously stated this is unlikely to happen. Additionally, we struggle to see any other educational benefits. Elements Green advocated during consultation that they would support schools visiting the solar park, delivered via Sherwood Forest Trust, to learn about energy production. When asked if they would provide funding to cover coach hire, the single controlling factor over the viability of a school visit, the answer was “No”. When questioned there was no planned programme in place and there was no intention of education beyond stating, as fact, that solar was a cheap and good source of energy for the country. This is indoctrination and does not equate to a full and balanced curriculum as nationally required. The applicant additionally maintained that the schools would want to visit the wildlife areas they are planning to develop as part of the ‘*Biodiversity Park*’, however there is not one specific place that a school could visit but corners of fields and hedgerows distributed across the project, totally inappropriate for a class visit. There are **no** educational benefits to be gained from this project.

Sustainable benefits: Energy produced by the solar panels will be fed directly into the national grid or into storage batteries and then available to home users throughout the country. There are no direct sustainable benefits to the local communities. At the Hearings in November 2025 the applicant was asked to qualify their claim that properties would receive cheaper electricity because of this project. Despite the claims of the literature sent out, and on their website, they acknowledged this was not within their control. Cost price is driven by many factors, since the inception and implementation of renewable energy to power the National Grid our energy bills have continued to increase.

d) Enhanced landscape and public access legacy

Should this application be approved several well used footpaths in our area will be *permanently deleted* from the Definitive Map. The applicant proposes to offer *Permissive Paths* as an alternative. Permissive paths are governed by a different set of rules to a Public Right of Way, often they are closed for at least one day a year to protect the status of permissive and no information available as to when this will happen or how these routes will be maintained. Permissive means that the rights to the routes can be revoked at any time by the landowner, are there any guarantees that the permissive rights will be protected for the duration of the scheme? After the forty-year period the Permissive Paths will be closed to the public. What would happen to these routes should the operation phase of the solar farm extend beyond forty years. This is not therefore a benefit as described by the applicant.

Applicant states that much of the screening will be by hedges, current hedges not removed will be allowed to grow taller. This is a change to the current vista and will prevent the

enjoyment of walking in the countryside, as will the proposed tall wire fences – alternative cheaper double fencing options were suggested page 20 of our submission 10.12.25 [EN010162-000589-1. Carlton-on-Trent Submission.10.12.25docx.pdf](#)

We maintain fewer people will continue to use the Permissive Footpaths due to the industrialisation of the countryside. The loss of amenity, the negative impact on mental health does not indicate a benefit.

The applicant proposes planting a community orchard. The location makes this impractical for Carlton-on-Trent residents, furthermore as this is not within any local community there will be of very limited benefit.

Community Benefit Fund NG+

The applicant has confirmed [REP 1-068] that NG+ measures are not part of the DCO proposals and are offered as an entirely separate community benefit. However, despite NG+ allegedly being available since the first consultation period we have yet to hear of any individual who applied (even though some were assured they would receive the funding as they were closely impacted by the project). Initially we were told that the NG+ fund would be available to those within communities most affected by the project. We suggested narrowing down the name of the fund (NG23) to indicate the area it covered, we were told this was too specific. Later we discovered that projects in central Nottingham city had applied for and successfully be given NG+ funding.

For some, the draw of the NG+ fund was considered a good reason to support the project.

In conclusion:

Carlton-on-Trent Parish Council have studied the information available and conclude there are **no benefits** from this proposal for our community.

Q 4.1.10 Consideration of Mitigation Measures

Firstly, it is important to recognise that there is a discrepancy between the Habitation Regulation Assessment (HRA) and the legal requirements outlined in the Sweetman judgement. Following the HRA report issued by GNR (Application reference EN010162), we concur that specific mitigation measures were not considered at the Stage 1 screening [AS-020]. Under the Sweetman judgement, 'mitigation designed to prevent harm must not be relied upon at Stage 1 screening to rule out likely significant effects. This legal principle ensures that screening focuses on credible ecological pathways without assuming mitigation success first.'¹ By failing to consider mitigation measures during the Stage 1 screening, the adverse effects related to biodiversity associated with the solar and biodiversity park have not been properly analysed or discussed, and therefore the assessment may lack accuracy. This **challenges** the overall robustness of the screening process.

There must be an awareness of the loss of ecological functionality despite claims of "biodiversity enhancements". There is an unavoidable loss of habitat, as despite the project's proposals for tree

¹ *Peter Sweetman and Others v An Bord Pleanála* (Case C-258/11) EU:C:2013:220 (CJEU)

planting, hedgerow development, and designated biodiversity areas outside the panel zones, the footprint of the solar panels and associated infrastructure will result in the destruction of existing habitats utilised by mammals, birds, invertebrates, amphibians, and plants that have adapted to the arable and pastoral landscape in Carlton-on-Trent and beyond. In addition to this, the functional connectivity the extensive solar array, along with associated fencing and infrastructure, fragments ecological networks, thereby impeding the movement of species such as hedgehogs, badgers, farmland birds, and pollinators across the landscape. Such fragmentation may impair gene flow and increase the vulnerability of local populations.

Further to this, there are effects of the displacement and disturbance during the constructions and early operation of the solar farm. Construction activities, including the operation of heavy machinery, earthworks, road development, and cable installation, have the potential to generate noise, vibration, and temporary habitat disruption. Such impacts are particularly significant if these activities occur during sensitive periods in the ecological cycle, such as breeding or nesting seasons. These operations may disturb ground nesting birds and small mammals that utilise, transit through, or forage in the open fields surrounding Carlton-on-Trent. Additionally, short-term increases in dust levels and general disturbance could adversely affect the foraging effectiveness and survival prospects of local wildlife. Where mitigation measures are presumed within the screening decision rather than explicitly assessed, there exists a risk that the cumulative and temporal impacts may be underestimated or inadvertently overlooked.

The Biodiversity Net Gain (BNG) uncertainties and habitat quality mitigation was not specifically considered in stage one. The applicant proposes extensive habitat creation measures such as planting 64,500 trees, establishing 50 km of hedgerow, and designating biodiversity areas to deliver Biodiversity Net Gain (BNG).² However, newly created vegetation typically takes many years to establish, meaning that the early operational period may experience a net loss of biodiversity relative to baseline conditions. In addition, created habitats are often structurally simpler than long-established semi-natural farmland edges and riparian margins, offering reduced ecological complexity and fewer niches for a wide range of species. Gains achieved through hedgerow and watercourse units also do not necessarily translate into the restoration of functional ecosystems for species dependent on open farmland, tall herb communities, or well-connected habitat corridors. Without robust scrutiny of baseline data, assumptions, and temporal effects, BNG claims risk overstating long-term benefits while understating losses, particularly during the early years of operation.

The proposed forty-year operational lifespan of the development indicates that its ecological impacts are likely to be long-term and, in planning terms, potentially permanent. Even with decommissioning after this period, legacy effects on soil structure, drainage patterns, habitat connectivity, and species composition could endure well beyond the lifetime of the project. Additionally, the success of designated biodiversity areas such as grassland and meadow habitats relies on ongoing long-term management, which requires secure funding, specialised expertise, **and** effective enforcement. Sustaining these commitments over several decades presents practical challenges, thereby introducing uncertainty regarding the achievement of the intended biodiversity outcomes in the long term.

Within the River Trent corridor, in the area surrounding Carlton on Trent, the increasing concentration of large-scale solar developments and associated infrastructure proposals results in cumulative pressures on ecological receptors, such as migratory bird populations, riparian habitats,

² Great North Road Project (GNR), *Environmental Statement: Ecology and Biodiversity* (GNR)

farmland invertebrate communities, and the functional connectivity of semi-natural habitats. These cumulative effects are not fully addressed where project-wide or design-based mitigation measures are assumed at Stage 1, this 'light-touch' approach may conceal the combined scale and interactions of disturbance, habitat loss, and fragmentation across the wider landscape. Consequently, there remains uncertainty regarding whether the integrity of sites connected to the Trent corridor could be affected, either directly or indirectly, through incremental ecological changes. Therefore, in accordance with the Sweetman judgement, it is reasonable to conclude that specific mitigation measures have not been adequately considered at HRA Stage 1, and that the potential for likely significant effects cannot be dismissed without an appropriate assessment prior to any further progression.

The Habitats Regulations Screening Report for the GNR Solar Park fails to apply the precautionary approach required at Stage 1 of the HRA. This methodological weakness is particularly concerning in the context of Carlton-on-Trent, which lies within a sensitive and functionally connected River Trent corridor. The screening process understates the potential for habitat loss and fragmentation across intensively farmed land that nevertheless supports important bird, invertebrate and small mammal populations. Construction and operational activity risks disturbance and displacement of species that utilise open farmland, hedgerows and watercourses, while alterations to land drainage and surface water flows have the potential to affect downstream riparian and wetland habitats beyond the site boundary. Furthermore, the assumption that mitigation will be effective from the outset masks uncertainty and time-lag effects associated with habitat creation and enhancement. Any future biodiversity gains cannot be relied upon to offset immediate ecological losses at the screening stage. The failure to fully consider cumulative pressures arising from multiple large-scale renewable energy developments within the Trent Valley further compounds this risk, increasing the likelihood of incremental habitat degradation and loss of ecological resilience at a landscape scale.

In conclusion, it is acknowledged that specific mitigation measures were not considered during the Stage 1 HRA screening [AS-020]. The screening predominantly relies on project-wide and design-based measures, without an assessment of the unmitigated baseline risk associated with the development, which is inconsistent with the legal principles established by the Sweetman judgment. This approach does not incorporate the requisite precautionary principle and may underestimate the likelihood of significant effects, particularly within the ecologically sensitive and functionally connected River Trent corridor. Furthermore, the screening does not fully address issues such as habitat loss, fragmentation, disturbance, temporal delays related to habitat creation, or the uncertainties surrounding the long-term achievement of Biodiversity Net Gain. It also falls short in adequately considering the cumulative effects arising from other large-scale developments in the vicinity. Consequently, the potential for likely significant effects on the areas cannot be definitively excluded at Stage 1, and an Appropriate Assessment is warranted to ensure compliance with the Habitats Regulations.

Carlton-on-Trent Parish Council confirm that specific mitigation **has not been** considered at the stage 1 screening

Q 11.1.12 Cumulative landscape and visual assessment

Carlton-on-Trent Parish Council believe that ALL consented projects, and those already going through the planning process, should be considered by the applicant within the cumulative impact assessment (those already in the planning stage may be approved as in the instance of Kelham thus creating additional impact); we **do not** agree that anything already developed should be considered as baseline – for reasons such as those specified above in 4.1.10. – their effect is cumulative.

The impact to all who wander from the boundaries of the village, whether that be to walk their dogs, enjoy a countryside stroll, exercise, improve their mental health and wellbeing or even take a relaxing drive, will have their experience radically impeded. Furthermore, residents that currently have a direct and picturesque view of the countryside, residents whose properties reside on the western edge of the village, will have their beautiful view of the rural landscape significantly and adversely impaired.

Residents of Carlton on Trent will be unable to travel in any direction without seeing panels.

When travelling North to Tuxford and beyond they must take the A1 or the B1164 and whichever they take they will be able to see the panels on the hillside to the West.

To access North Muskham, Newark and beyond to the South they must take the A1 where, again there will be panels visible on the West.

Both journeys will be worse travelling homeward because the panels come into site on the Eastern vista from a greater distance.

Having the river to the East means that any journey towards Lincoln will start and finish by travelling North or South to cross the river, thus the journey begins and ends with views of panels and in all probability, will pick up site of One Earth development to the North East or Winthorpe and Barnby in the Willows developments to the South East.

But perhaps the worst journey of all will be for those travelling West to Southwell and beyond. Southwell is 12 miles away following the A1 South or 14 miles following the B1164 West. Either route practically traces the ring of the Great North Solar development so is one of views of panels for most of the journey. Given the number of incidents that bring the A1 to a halt, locals tend to take the B1164 despite it being a little further it is often shorter in time. As they leave the village and cross the A1 and the railway, they will be looking up towards the Great North Solar development. Shortly after this, they drive through the development – with fields both sides of the road covered in panels. There is a brief respite as they pass through the woods before heading down the hill towards Ossington when they will then have panels one side of the road or the other all the way to, and along Kneesall road to join the A616. Taking the A616, there are panels visible both left and right as far as Caunton Road. Upon turning right towards Hockerton, they will pass through the middle of the Knapthorpe Lodge and Muskham Wood developments with panels both sides of the road, then cut across the ring of the Great North Solar development meaning that they are still passing and seeing panels until they reach the edge of Hockerton. It is only at this point with 2 miles of the journey remaining, that they can travel without site of any panels, having made 85% of the journey looking at grey fields. However, when returning home, they will see panels ahead as they approach Hockerton so even the first 2 miles won't be panel free – almost the entire journey will have panels visible in one direction or another. To avoid site of some panels they could take the country lanes and pass across the centre of the Great North Solar 'doughnut' but this still means passing panels along much of the Norwell road, seeing glimpses of the Foxhills development passing from Norwell to Caunton and then picking up the Hockerton Road passing through Knapthorpe Lodge, Muskham Wood and Great North developments to reach Hockerton so still a journey mostly beset by views of panels.

There are no routes that could be taken as an alternative should anyone not wish to see panels. **All routes would demonstrate 'frequent sequential', with this latter example of 'more than frequent sequential'.**

Q 13.1.6 Sustainable drainage system design

The absence of a sustainable drainage system (SuDS) across the works 2, 3, 6, 7 and 8 causes great concern for Carlton-on-Trent Parish Council and reflects what we perceive to be a broader “light-touch” approach to flood risk management within the application. We wish to see detailed examination of potential issues that are likely to arise during periods of rainfall and how the applicant will mitigate against these, particularly in relation to cumulative effects and downstream consequences for the village.

While there is the potential to improve drainage patterns during the construction phase these must be identified in a timely manner and confirmed as suitable to each individual scenario by a relevant body; what might work in the Maplebeck area, upstream, may not be as effective closer to the river basin for Carlton-on-Trent; increasing the speed that water leaves an area is only effective if downstream systems have sufficient capacity and do not transfer flood risk elsewhere.

The applicant has made suggestions of actions that could be used, taking a generic approach to mitigation without recognising the need to consider environmental variations based on location, such as soil type, topography, established water courses, to name but a few. The applicant should by now, have determined what measures will be implemented, where, and how they will be maintained to ensure sustainability and longevity. For example, soak-aways, which could be introduced when installing underground cables, are known to silt up and lose effectiveness. How will these be maintained? Similarly, if detention basins are proposed, the applicant should demonstrate how these will be designed, managed and integrated into the wider drainage network. A detention basin can only retain a surfeit of water if it is previously empty. How regularly are these to be emptied, who by, how will this be enforced during operation phase?

If the applicant is to maximise the benefit of using existing ditches and water courses, and to ensure the system is sustainable, we would also ask that ditches around developed fields be maintained to ensure their longevity at mitigating flood risk, again a management plan needs to be available to ensure these are regularly maintained.

Vehicles using field access points during the construction and throughout maintenance, will damage and wear down existing waterways disturbing the flow of water and potentially flooding unanticipated areas. This we have first-hand experience of. Pluvial water flows down access roads at field DB042 and DB052, flowing into the road causing them to flood. These fields have been identified for development with access via these tracks. Increased track widening, increased road surfacing and increased traffic will add to the problems previously experienced as permeably surfaces are lost. Carlton-on-Trent Parish Council require the applicant to recognise these issues and provide a specific sustainable drainage strategy that will run from construction, through operational phase, and finally decommissioning.

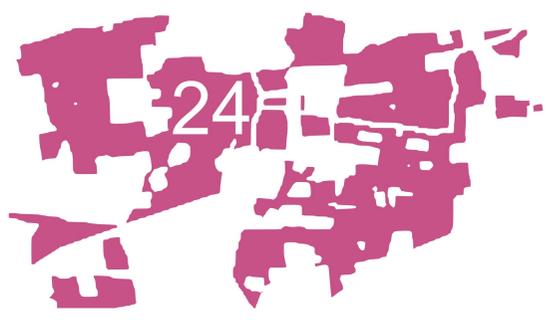
During the construction phase land becomes compacted, particularly heavy clay, compaction will occur throughout unless land is regularly turned – which this will not be. While works 3 is soft landscaping and therefore compaction will not be as significant as for other works, we would like to ensure that applicant has recognised this phenomenon will still occur and appropriate measures taken. To this end, we request **expanded site-wide infiltration testing**, extending beyond the limited three trial pits per area, alongside robust modelling of long-term soil compaction resulting from construction activity and ongoing sheep grazing. The current conclusion of “negligible movement” (Section 6.1) is not adequately supported. In the absence of downstream modelling—particularly for

impacts on Carlton-on-Trent—the application may fail to meet National Planning Policy Framework requirements to fully assess and mitigate flood risk from increased pluvial runoff.

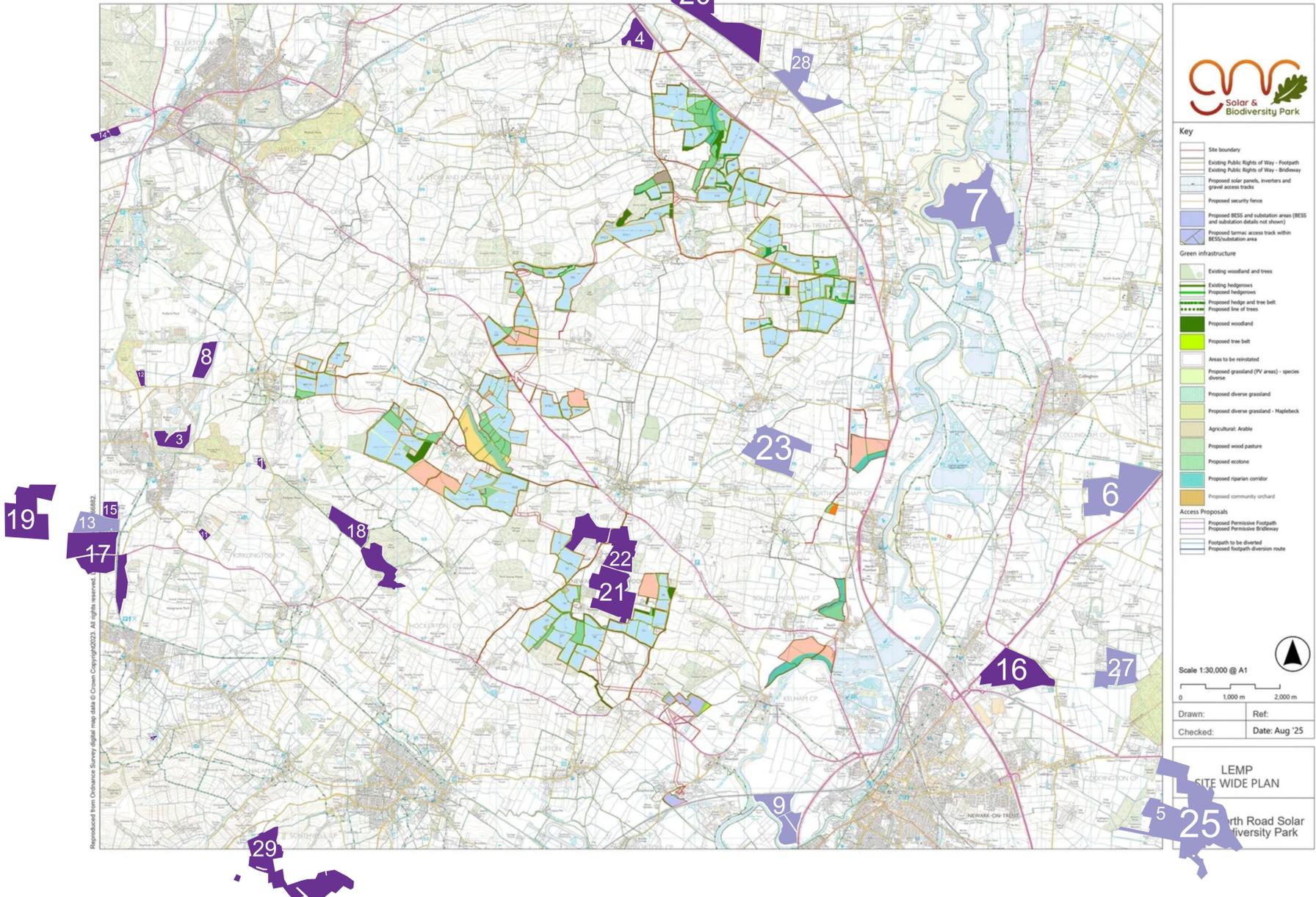
At present, we see little acknowledgement of the flood risk that the development poses to Carlton-on-Trent, and consequently a limited focus on meaningful mitigation of the pluvial flooding hazard that the village may face.

- Key
- 1 Coultas Cover Farm Eaking Road Kirklington
 - 2 Old Hall Farm Greaves Lane Edingley
 - 3 Bilsthorpe Business Park Eaking Road Bilsthorpe
 - 4 Land Between Weston Road And The A1 Egmaton
 - 5 and 25 Sleaford Road Barnby In The Willows
 - 6 Wheatley Farm Wheatley Lane Collingham
 - 7 Trent Lane Girton
 - 8 North Of Eaking Road Eaking
 - 9 Fosse Road Farndo
 - 11 Yearsley Group Belle Eau Park Bilsthorpe
 - 12 Rufford Lane Rufford
 - 13 Featherstone House Farm Mickledale Lane Bilsthorpe
 - 14 South Of Ollerton Road Edwinstowe
 - 15 Forest Lane Bilsthorpe

- 16 Newark Showground Lincoln Road Winthorpe
- 17 Crifton Lodge Farm Forest Lane Bilsthorpe
- 18 Winkburn Lane WinkburnInkersall
- 19 Grange Road Bilsthorpe
- 20 Land Off Hawbush Road Weston
- 21 Muskham Wood Poultry Site Muskham Woodhouse Hockerton
- 22 Knapthorpe Lodge Hockerton Road Caunton
- 23 Foxholes Farm Bathley Lane North Muskham
- 24 One Earth Solar Farm Project
- 25 Sleaford Road Barnby In The Willows
- 27 Langford Moor Farm Drove Lane Langford
- 28 Grasshorpe Lane Weston
- 29 Land North of Halloughton Southwell



- Permitted
- Application/Screening
- NSIP



- Key**
- Site boundary
 - Existing Public Rights of Way - Footpath
 - Existing Public Rights of Way - Bridleway
 - Proposed solar panels, inverters and grant access tracks
 - Proposed security fence
 - Proposed BESS and substation areas (BESS and substation details not shown)
 - Proposed farm access track within BESS/substation area
- Green infrastructure**
- Existing woodland and trees
 - Existing hedgerows
 - Proposed hedgerows
 - Proposed hedge and tree belt
 - Proposed line of trees
 - Proposed woodland
 - Proposed tree belt
 - Areas to be reinstated
 - Proposed grassland (PV areas) - species diverse
 - Proposed diverse grassland
 - Proposed diverse grassland - Haglebeck
 - Agricultural: Arable
 - Proposed wood pasture
 - Proposed ecotone
 - Proposed riparian corridor
 - Proposed community orchard
- Access Proposals**
- Proposed Permissive Footpath
 - Proposed Permissive Bridleway
 - Footpath to be diverted
 - Proposed footpath diversion route

Scale 1:30,000 @ A1

0 1,000 m 2,000 m

Drawn: Ref:

Checked: Date: Aug '25

LEMP
SITE WIDE PLAN

North Road Solar
Biodiversity Park

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