

Great North Road Solar and Biodiversity Park

Draft Statement of Common Ground with National Highways

Document Reference – EN010162/APP/8.4A

Revision number 2

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Revision History

Revision	Revision Date	Authorised By	Position	Comment
Issue 1	17/09/25	ES	Head of Planning	1 st Draft for NH Review
Issue 2	25/11/25	ES	Head of Planning	Issue 2 for NH Review
	10/12/25	RC	Senior Associate (Pinsent Masons) on behalf of National Highways	Comments on Issue 2
Issue 3	16/1/26	ES	Head of Planning	D2 updates

1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support an application (the Application) for a Development Consent Order (DCO) from the Secretary of State (SoS) for Energy Security and Net Zero under Section 37 of the Planning Act 2008 (PA 2008) for the proposed Great North Road Solar and Biodiversity Park Development (the Development). The Application has been submitted by Elements Green Trent Limited (the Applicant).
- 1.1.2 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the Parties, and where agreement has not (yet) been reached.
- 1.1.3 SoCGs are an established means in the planning process of allowing all Parties to identify and focus on specific issues that may need to be addressed during the examination. This SoCG will be revised and updated as discussions between the Parties progress during the Examination.

1.2 PARTIES TO THIS STATEMENT OF COMMON GROUND

- 1.2.1 This SoCG has been prepared by (1) Elements Green Trent Limited as the Applicant and (2) National Highways (collectively, 'the Parties').

1.3 TERMINOLOGY

- 1.3.1 In the table in the Issues section of this SoCG:
- "Agreed" (Green) indicates where the issue has been resolved;
 - "Under discussion" (Amber) indicates where a matter is the subject of ongoing discussion; and
 - "Not Agreed" (Red) indicates a final position.
- 1.3.2 Where National Highways expresses agreement, it does so only in so far as it has considered the issue with regards to its statutory remit and on the basis of the information provided by the Applicant. Agreement is offered without prejudice to the submissions of other interested Parties who may have greater knowledge of technical or site-specific issues.

1.4 RECORD OF RELEVANT CORRESPONDENCE

- 1.4.1 The Applicant has undertaken consultation and engagement with National Highways throughout the development of the Application. The Applicant consulted National Highways in accordance with section 42 of the PA 2008, about the Development and environmental impact assessment as part of the formal pre-application consultation and publicity procedures. This process afforded National Highways the opportunity to provide responses to the information provided at various stages of the pre-application process.
- 1.4.2 Table 1-1 identifies the discussions and correspondence that has taken place between the Parties to date.

Table 1-1 Record of Correspondence

Date	Type (meeting, etc.)	Topic
15 August 2024	Meeting	Topics discussed: <ul style="list-style-type: none"> • Introduction to the Development • General approach to trip generation • Overview of routing strategy • CTMP to control traffic movements – NH desire for SRN trips outside of peaks • Shuttle bus for workers - NH keen to confirm details • Construction phase is main interest – operational period accepted as minimal impact
8 October 2025	Virtual Meeting	To discuss Issue 1 of the SoCG. Agree timescale and next steps for next draft.
25/11/25	Email	Issue 2 of the SoCG for NH comment.
10/12/25	Email	Pinsent Masons issued comments on the SoCG
7/1/26	Email	Applicant raised a query relating the NH's PP position, and is awaiting a response.
16/1/26	Email	Applicant issued updated version of the SoCG

1.4.3 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Parties in relation to the issues addressed in this SoCG.

2 CURRENT POSITION OF THE APPLICANT AND NATIONAL HIGHWAYS

2.1 TRAFFIC AND TRANSPORT

Table 2-1 Traffic and Transport

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
2.1.1		Policy Compliance	The Applicant considers that the Development is fully in compliance with NPS EN-1, EN-3 and EN-5.	National Highways reserves its position pending the information that has been requested from the Applicant as set out in our relevant representation.	Under Discussion
2.1.2	RR	Assessment Methodology (including Study area)	<p>The Applicant considers that the scope and methodology of ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [APP-057] is appropriate. Section 14.4.5 of ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [APP-057] sets out that the Assessment has used the IEMA guidance to determine the scale and extent of the assessment. It notes at paragraph 48 that “An initial screening for severance, pedestrian and cyclist amenity and delay, fear and intimidation and highway safety should follow two rules:</p> <p>1. Include highway links where traffic flows are predicted to increase by more than 30% (or where the</p>	Given that the A1 has been identified as a key route for access to the site — particularly for Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs) associated with the construction phase — National Highways requests the A1 to be included in the	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>number of HGVs is predicted to increase by more than 30%); and</p> <p>2. Include any other specifically sensitive areas where traffic flows are predicted to increase by 10% or more".</p> <p>For completeness and in response to the NH comment, the screening assessment for the A1 has now been included in the revise ES Chapter within Table 14.15.</p> <p>Traffic flow data has been obtained from WebTRIS, the National Highways web-based system for accessing historic traffic data from the Strategic Road Network, specifically, SiteID 30360804 and 30360804. These sites are located on the A1 northbound and southbound respectively, to the north of Cromwell, between the B6325 and B1164.</p> <p>The screening assessment of the A1 northbound and southbound demonstrates that the percentage impact on AADT and HGV% during construction falls well below the lowest screening threshold of 10% and as such, further assessment not required under the IEMA guidance.</p>	<p>assessments, in accordance with the IEMA Guidelines for the Environmental Assessment of Traffic and Movement (July 2023).</p> <p>National Highways also noted that Kneesall, Kersall & Ompton Parish Council have requested the A616 be included in the assessment in addition to the A1 and North-eastern Railway Line. The consultation response advises that the A646 has been assessed. This should be corrected to align with the request and details in the report.</p>	

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
2.1.3	RR / WR	Development Access and Traffic Measures	<p>Appendix G of ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1B] provides an AIL report, produced by Wynns Limited, who are specialists in the transportation of abnormal indivisible loads. Wynns have considerable experience of transporting abnormal loads in the region and the report provided in Appendix G confirms the Wynns have during 2024/25 cleared routes from both Goole and south of Newark for other project work in the area for transformers and that the A1 can be considered as structurally suitable for the proposed AILs. Each of the routes to site from the Port of Goole, West Dock South are described and presented on plans, along with details of the vehicle used.</p> <p>The Wynns AIL report in Appendix G concludes that the proposed routes to the Development for AILs utilise previously proven AIL routes from Port of Goole using the A1.</p> <p>ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [APP-057] has assumed that AILs may be used to transport various key pieces of equipment to the site, such as the cable drums and transformers, for example. The Outline CTMP sets out that discussions with Nottinghamshire County Council and the police will be necessary to confirm access requirements in terms of escorting of the AILs and these will be included in the Detailed CTMP prior to construction. As agreed with National Highways, the</p>	<p>National Highways note that Abnormal Loads and Abnormal Indivisible Loads (AILs) will be routed via the A1. As such, National Highways request:</p> <ul style="list-style-type: none"> • Swept path analysis is conducted to demonstrate that SRN junctions can accommodate the abnormal loads, and that the drawings of this analysis are provided for our review. • The proposed routing along with details of any height and weight 	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>Detailed CTMP will be subject to consultation with National Highways before such details can be approved.</p> <p>The Assessment set out in Appendix G of ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [APP-057] shows that routes in the area have been previously used for heavy load deliveries to and from power stations and substations and the commitments set out in the Outline CTMP provide appropriate controls that ensure that any AILs needed for the construction of the Proposed Development are controlled in a suitable way. Notwithstanding, it is acknowledged that further detailed discussions and approvals will need to be agreed with National Highways who provide authorisation for Special Order movements.</p> <p>Transformers</p> <p>Included within the AIL reports in Appendix G is a summary of historical information and structural suitability from Wynns' experience of clearing routes in 2024/25 from Goole. It highlights that loads were transported on 28-axle girder frame trailers due to the largest loads, which were much heavier than the 155te transformers required for the Proposed Development. It concludes that the A1 is suitable for AILs.</p> <p>Cable Drums</p>	<p>constraints that may affect the movement of AILs, are provided for our review.</p> <p>Clarification on the total number of AIL movements anticipated, including their dimension and expected frequency in relation to the proposed development.</p>	

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>The AIL report for Cable Drum transportation in Appendix G is based on a transport weight of 30te nett and a diameter of 4.5m. These would typically be transported on modular trailers in either a spooling arrangement or vessel bed trailers. Two indicative trailer arrangements are provided in the report. Only routes identified as being negotiable for cable drums and shown as 'Green' will be pursued.</p>		
2.1.4	RR	Trip Generation	<p>As noted in paragraph 48 of ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A] [REP1-028], 'Core working hours are to be between 07.30 and 18.00, Monday to Friday, and 08.00 and 13.00 on a Saturday (unless in exceptional circumstances where the need arises to protect plant, personnel or the environment). In addition to this, a start-up and close-down period of up to an hour before and after the core working hours is proposed'. The Outline CTMP includes a commitment to a construction worker shuttle bus, which will further reduce trips to the Site. It also confirms that the shuttle bus will operate outside of the SRN peak periods. Paragraph 50 then notes 'Construction worker shifts will be scheduled so that workers are not travelling during the network peak hours of 08:00-09:00 and 17:00-18:00'.</p> <p>Paragraph 49 of the Outline CTMP notes that <i>'Deliveries by HGV will be coordinated through a booking system to avoid travel during the network peak</i></p>	<p>NH note that the construction phase is expected to last 24 months in total, and this period is likely to generate the most significant traffic impacts on the SRN. NH welcome the inclusion of the 20% uplift as this enhances the robustness of the trip generation calculations. National Highways requests that the applicant provides details of the expected hourly</p>	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p><i>hours, where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible. Additionally, to avoid unnecessary interaction with school users, deliveries utilising large vehicles will be timed as such that they do not arrive between 08:00 – 09:30 and 14:30 – 15:30 if they pass schools; large delivery vehicles will also not be allowed to leave the site during these time periods’.</i></p> <p>Therefore, there should be limited or no construction vehicle movements during these periods. Further details are then secured by Requirement 14 of the Draft DCO, which requires a Detailed CTMP for each phase to be submitted to and approved by the County Authority, following consultation with NH.</p> <p>It is assumed that construction workers would arrive to the Order limits within the hour prior to starting a shift and depart within the hour after completing a shift. In terms of the small number of other staff travelling at various times, it is assumed that they would arrive between 09:00-12:00hrs and depart between 14:00-17:00hrs.</p> <p>For the purposes of presenting NH with forecast hourly flows, the winter profile is considered below to provide a worst-case assessment in terms of travel patterns, resulting in the development peak hours being more closely aligned with the network peak hours due to the compressed working hours (10-hour shift).</p>	<p>traffic flow. This will enable National Highways to determine the potential impacts on the SRN, particularly during the typical AM and PM peak hours.</p> <p>Additionally, we note that core working hours are stated as 07:00 to 19:00 on weekdays. National Highways requests that further information regarding staff shift patterns and anticipated staffing levels be provided for our review.</p>	

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			<p>Aside from worker trips, construction trips are expected to be split relatively evenly across the day and therefore, the AADT flows in Table 1 can be broadly divided by 8 hours (10-hours minus AM and PM peak periods) to provide an hourly flow. To proportion flows onto the A1 in a robust manner the assessment on northbound traffic flows assumes that 70% of construction traffic will route to/from the north and the assessment on southbound traffic flows assumes that 70% of construction traffic will route to/from the south. This would equate to 36 trips per hour to/from the A1 northbound and southbound during <u>the peak month (Month 16)</u>. Outside of the peak month, trips will be fewer, and this is shown in Table 2 which shows the anticipated profile over the 24-month construction programme.</p> <p>Table 2 – Average Hourly Construction Trips on A1</p> <table border="1"> <thead> <tr> <th></th> <th colspan="24">Month</th> </tr> <tr> <th></th> <th>1</th><th>2</th><th>3</th><th>4</th><th>5</th><th>6</th><th>7</th><th>8</th><th>9</th><th>10</th><th>11</th><th>12</th><th>13</th><th>14</th><th>15</th><th>16</th><th>17</th><th>18</th><th>19</th><th>20</th><th>21</th><th>22</th><th>23</th><th>24</th> </tr> </thead> <tbody> <tr> <td>Trips on A1</td> <td>0</td><td>12</td><td>20</td><td>26</td><td>6</td><td>10</td><td>10</td><td>11</td><td>11</td><td>11</td><td>7</td><td>4</td><td>1</td><td>16</td><td>28</td><td>36</td><td>8</td><td>12</td><td>13</td><td>13</td><td>13</td><td>13</td><td>10</td><td>6</td> </tr> </tbody> </table>		Month																									1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	Trips on A1	0	12	20	26	6	10	10	11	11	11	7	4	1	16	28	36	8	12	13	13	13	13	10	6		
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2.1.5	WR	Trip Distribution	<p>Traffic flow diagrams for the junctions on the A1 were provided at Deadline 1. The flows presented are the AADT construction traffic flows on the A1, assuming a scenario whereby all traffic routes to/from the north and also, all traffic routes to/from the south. These</p>	National Highways requests that flow diagrams for construction traffic are provided for our review. When this	Under Discussion																																																																											

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			diagrams will show the traffic flows currently presented in Appendix 1 of this SoCG.	has been provided, we will be in a better position to comment on the traffic impact of the proposed development.	
2.1.6		Mitigation Measures	The Applicant considers the measures that are set out within the ES Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan (oCTMP) [EN010162/APP/6.4.5.2A] and the ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] are appropriate. ES Volume 4, Appendix 5.6: Outline DRP [EN010162/APP/6.4.5.6A] includes provision for the final DRP to include a Decommissioning Traffic Management Plan (DTMP). The detailed DRP will be secured by Requirement 19 in Schedule 2 of the Draft Development Consent Order [EN010162/APP/3.1C] ES Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2B] will be used as a basis for the final CTMP to be submitted for approval to NSDC in consultation with NCC and National Highways. The detailed CTMP will be secured by Requirement 14 in Schedule 2 of the Draft DCO [EN010162/APP/3.1C] .	National Highways reserves its position until the information requested has been provided at Deadline 1.	Under Discussion
2.1.7		Assessment of Effects	Further information pertaining to trip generation, distribution and impacts on the A1 is provided within this Note and within the revised ES Chapter.	The Applicant has not assessed the impacts of	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>The Applicant considers that the effects associated with traffic movements during construction and decommissioning is short term and temporary. Due to the reduced traffic levels throughout the operational phase compared to the construction phase, effects on collisions and safety, severance, driver delay, pedestrian delay and amenity and hazardous loads are considered to be negligible and not significant.</p> <p>Therefore, the Applicant considers that the effects associated with traffic movements on the environmental receptors are acceptable. This is set out in ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [APP-057].</p>	<p>construction traffic on the A1. This position is contrary to both IEMA guidance and the scoping opinion obtained by the Applicant which specifically required the assessment of effects on the A1. Further, trip generation and distribution data remains outstanding.</p> <p>National Highways welcomes the commitment from the Applicant that this information will be provided for review at Deadline 1.</p>	
2.1.8	RR	Construction Effect on the Strategic Road Network	<p>Refer to the Applicant's responses at row 2.1.2, 2.1.4 and 2.1.5.</p> <p>Access to the Development will not be taken directly onto the SRN.</p>	Appendix A14.1 - Transport Statement Site Access We note that access to the site is not proposed	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>Further information requested by NH regarding trip generation and trip distribution has been provided within this note and the revised ES Chapter to support the position of junction capacity assessment of the A1 not being necessary.</p>	<p>directly onto the SRN. As such, Section 175(b) of the Highways Act 1980 (as inserted by The Infrastructure Act 2015) is not relevant.</p> <p>When the trip generation and trip distribution have been agreed, National Highways will be in a better position to comment on the acceptability of the traffic impact of the proposed development, and advise whether further junction capacity assessments are required on the SRN junctions.</p>	
2.1.9	RR	Operational Effects	Noted.	Given the nature of the site and the proposed level of	Agreed

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
				trips during the operational phase, National Highways is content that the level of traffic during the operational phase will not have a material impact on the SRN.	
2.1.1	RR	Decommissioning Effects	An evaluation of the decommissioning phase is included in Section 14.7.3 of ES Volume 2, Chapter 14: Traffic and Transport [EN010162/APP/6.2.14] [APP-057]. ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036] includes details of the Development. Requirement 19 in Schedule 2 to the Draft Development Consent Order [EN010162/APP/3.1C] secures the Decommissioning and Restoration Plan. This must be prepared in accordance with ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036] .	National Highways requests further information regarding the decommissioning phase for the proposed development to be provided for their review.	Under Discussion
2.1.1	RR / WR	Other Matter - TEMPro growth figures	TEMPro factors were determined from the 'region of Newark and Sherwood: Average Day' using TEMPro Version 8.1. This is considered a reasonable approach when considering AADT flows and the process of screening links.	Regarding the TEMPro growth figures, National Highways requires further information	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>Separate growth factors for the AM and PM peaks would not seem necessary given that Section A5.2.4.2 of ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2B] sets of that deliveries by HGV will be coordinated through a booking system to avoid travel during the network peak hours, where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible.</p>	<p>on the geographical area selected to calculate the growth factors. We expect separate growth factors to be provided for the typical network AM and PM peak hours. Furthermore, we require the assessment to be conducted using the most recent version of the TEMPro software available; at the time of writing, this is Version 8.1. We request that these growth factors, along with clarification of all inputs into TEMPro are provided for our review.</p>	

2.2 CONSTRUCTION ROUTES

Table 2-2 Construction Routes

Ref	Relevant Document	Description of Matter	Applicant’s Position	National Highways’ Position	Status
2.2.1		Construction Routes	<p>Additional consideration of the forecast construction traffic flows on the A1 is provided within this Note and the revised ES Chapter in response to NH Comment Refs 2.1.2 and 2.1.4.</p> <p>The Applicant considers that ES Volume 4, Appendix 5.2: Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2B] provides appropriate measure to ensure that construction traffic will only arrive at a site access from specified direction and via route that has been included within this assessment.</p> <p>The key construction routes for HGV and non-HGV traffic are shown in ES Volume 3, Figure 14.2: Link Identification Plan [EN010162/APP/6.3.14A] [AS-046] along with the link identification numbers used within ES Volume 2, Chapter 14: Traffic</p>	<p>Given that the A1 has been identified as a key route for access to the site — particularly for Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs) associated with the construction phase — National Highways requests that the A1 be included in the assessments, in accordance with the IEMA Guidelines for the Environmental Assessment of Traffic and Movement (July 2023).</p>	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			and Transport [EN010162/APP/6.2.14B], which are also listed in Table 14.2.		

2.3 CONSTRUCTION TRAFFIC MANAGEMENT PLAN

Table 2-3 Construction Traffic Management Plan

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
2.3.1	WR	Strategic Road Network	ES Volume 4, Appendix 5.2: Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2A] sets out the requirements for detailed CTMP to be submitted for approval to NCC in consultation with National Highways. The detailed CTMP will be secured by Requirement 14 in Schedule 2 of the Draft Development Consent Order [EN010162/APP/3.1C] . The Draft Development Consent Order [EN010162/APP/3.1C] was amended at Deadline 2 to include National Highways as a	The CTMP should cover the anticipated construction traffic demands on the SRN during AM and PM peak hours in the month when the maximum construction traffic volume is expected. Given that the A1 has been identified as a key route for access to the site — particularly for Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs) associated with the construction phase — National Highways requests that the A1	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>consultee to Requirement 14 of Schedule 14. S</p> <p>Section A5.2.4.2 of ES Volume 4, Appendix A5.2: Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2B] sets out that deliveries by HGV will be coordinated through a booking system to avoid travel during the network peak hours, where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible.</p> <p>In addition Section A5.2.4.1 sets out that a shuttle bus service will be used to transport construction workers to and from the Order Limits. It also confirms that the shuttle bus will operate outside of the SRN peak periods.</p> <p>Additional consideration and assessment of the forecast construction traffic flows on the A1 is provided within this Note and the revised ES Chapter in response to NH Comment Refs 2.1.2 and 2.1.4.</p>	<p>be included in the assessments.</p> <p>Requirement 14 should be amended to ensure that any detailed CTMP submitted should require NH's approval insofar as the matters concerned relate to the SRN.</p>	

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
2.3.2	RR	Signage on the Strategic Road Network	<p>ES Volume 4, Appendix 5.2: Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2A] sets out the information that will be set out in a detailed CTMP. The Detailed CTMP will be submitted for approval to NCC in consultation with National Highways. The detailed CTMP will include details of any signage requirements and is secured by Requirement 14 in Schedule 2 of the Draft DCO [EN010162/APP/3.1C], however, it is not expected that any temporary signage will be installed on the SRN..</p>	<p>National Highways requires full details, including the dimensions of the signs of any proposed signage, both temporary and permanent, to be located on the SRN. If temporary traffic management signs are to be installed on the A1, National Highways must review and approve the proposed signage.</p> <p>Should the applicant proceed with signage on the A1 trunk road, they will be responsible for all associated costs.</p>	Under Discussion
2.3.3		Abnormal Loads	<p>Please refer to the response to 2.1.3 above. Appendix G of ES Volume 4, Appendix A14.1: Transport Statement [EN010162/APP/6.4.14.1B] provides details of abnormal load assessments, including swept path analysis. We will work with National Highways to provide any additional information required.</p>	<p>National Highways request that swept path analysis is conducted to demonstrate that SRN junctions can accommodate the abnormal loads, and that the drawings of this analysis are provided for our review.</p> <p>In addition, we further request that the proposed routing along</p>	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
				<p>with details of any height and weight constraints that may affect the movement of AILs, are provided for our review.</p> <p>Furthermore, we seek clarification on the total number of AIL movements anticipated, including their dimension and expected frequency in relation to the proposed development.</p>	

2.4 DECOMMISSIONING TRAFFIC MANAGEMENT PLAN

Table 2-4 Decommissioning Traffic Management Plan

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
2.4.1		Relevant Consultees	<p>ES Volume 4, Appendix 5.6: Outline DRP [EN010162/APP/6.4.5.6A] includes provision for the final DRP to include a Decommissioning Traffic Management Plan (DTMP).</p> <p>ES Volume 4, Appendix 5.6: Outline Decommissioning and Restoration Plan</p>	As the effects of construction and decommissioning traffic on the A1 have not been assessed within the Applicant's assessment. National Highways requires that Requirement 19(1) be amended to ensure that any decommissioning and	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			[EN010162/APP/6.4.5.6A] REP1-036 sets out the requirements for a detailed DRP to be submitted for approval to NCC in consultation with National Highways. The detailed DRP is secured by Requirement 19 in Schedule 2 of the Draft Development Consent Order [EN010162/APP/3.1C] .	restoration plan be approved by National Highways in respect of any matters with relate to the SRN. National Highways notes that the current draft DCO requirement 19(1) does not provide for consultation with National Highways as the Applicant states.	

2.5 GLINT AND GLARE

Table 2-5 Glint and Glare

Ref	Relevant Document	Description of Matter	Applicant's Position	NH's Position	Status
2.5.1	RR	Assessment of Effects and Mitigation Measures	As stated in Section 16.1.6 of the ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286] , the assessment concludes that limited exceedances of the criterion for certain stretches of the A1 (northbound), A616 (northwest bound) and A617.	NH agreed with the receptors included in the assessment. NH recognised that the methodology will be refined as part of the detailed design for the individual sites.	Agreed

Ref	Relevant Document	Description of Matter	Applicant's Position	NH's Position	Status
			Mitigation measures are set out and secured that would then reduce effects to an acceptable level.		
2.5.2	WR	Other Matters- Receptors	<p>Results of the assessment are presented for each receptor location in Section 16.1.6 of the ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]. As the source of any glare is often just a small part of one or more arrays, specifying which array(s) contribute to glare effects for each receptor is considered to be too simplistic, and risks misrepresenting the extent of the predicted effects.</p> <p>Section 16.1.4.2.1 of the ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286] provides assessment criteria for route receptors. As stated in paragraph 61, the criteria specified for road and rail receptors are based upon those for aviation, with an appropriate cross-reference</p>	<p>NH made the following comments:</p> <ol style="list-style-type: none"> 1. General: In reporting, it would be useful to note which arrays will affect receptors that have reported exceedances for ease of reference rather than having to find them in the figures. 2. Section A16.1.4.2.1: <ul style="list-style-type: none"> • Narrative is provided for road receptors (including horse riders, HGV and agricultural vehicle drivers), no additional commentary is provided regarding other receptors in the section heading. • Criteria noted does not align with aviation receptor requirements. 3. Road Receptors: 	Under discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	NH's Position	Status
			<p>provided. As stated in Section 16.1.6.4 of the ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286], as a result of the Development's design changes since the PEIR, there are no navigable waterways located within the respective study area, and waterways have therefore been discounted from further consideration.</p> <p>Table 16.1.2 of the ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286] presents the predicted glint and glare durations for each assessed receptor. The A617 is predicted to experience less than 1 hour of low-intensity '<u>Green</u>' glare per year. As stated in Section 16.1.4.2.1, Green glare is of a low-intensity and is acceptable without the requirement for additional mitigation, regardless of duration.</p>	<ul style="list-style-type: none"> • The report states exceedances for the A1, A616 and A617 and mitigation is expected to be required. • The A617 appears to show up to an hour of exposure per year as part of the tabulated results. Please review and advise. <p>4. Dwelling Receptors</p> <ul style="list-style-type: none"> • Glare effects tabulated for Dwelling 3 and Dwelling 36 without sky condition consideration exceed the recommended annual threshold of 30 hours set out in the report, consideration of cloudy sky conditions reduces the expected hours to within acceptable levels. • Dwelling 36 is discussed, dwelling 3 is not. <p>National Highways requests that Requirement 22(1) is</p>	

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			<p>With regard to residential dwellings, it is agreed that Dwelling 3 and Dwelling 36 exceeds the recommended annual threshold of 30 hours set out in the report, on a theoretical basis (i.e. bright sunshine during all hours of daylight during the whole year). This is clear not a realistic assumption, therefore an appropriate correction is applied to determine the likely effects, as described in Section 16.1.5.4. After accounting for this correction, effects are below the assessment criteria at all residential dwellings, and therefore acceptable.</p> <p>Effects on residential receptor are discussed in Section 16.1.6.5. As clearly stated in the text, Dwelling 36 is discussed as an exceedance of the assessment criteria was found at this location at the PEIR stage. As such, the PV arrays which were located closest to Dwelling 36 were reduced in size as part of the Development's design evolution, which reduce the duration of glare to acceptable</p>	<p>amended so that any glint and glare assessment for a phase which results in potential glint and glare effects on the SRN is approved by National Highways.</p>	

Ref	Relevant Document	Description of Matter	Applicant's Position	NH's Position	Status
			<p>levels. Conversely, Dwelling 3 is not specifically discussed, as there was no exceedance of the assessment criteria at the PEIR stage, nor is there at the ES stage.</p> <p>The Applicant notes the request for NH to approve Requirement 22. The Applicant considers that it would be appropriate to name NH as a consultee, with NCC then remaining the approving authority. The Applicant considers that NCC can be relied on as acting reasonably, and would ensure that any representations made by NH on glint and glare matters that affect the SRN would be given appropriate regard. The Applicant considers that this position is appropriate and reasonable.</p>		
2.5.3		Other Matters – Cumulative Assessment	<p>Cumulative effects are discussed in Section 16.1.7 of the ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286]. Cumulative effects were considered for the entire Development, however area GG5</p>	<p>Cumulative assessment is made for GG5 only, with residential receptors only present in the overlap of study areas for GG5 and Muskham Wood Solar Farm. Please advise regarding the assumptions regarding the</p>	Under discussion

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			<p>was the only area with receptors located within the cumulative study area.</p> <p>The cumulative modelling for Muskham Wood Soar Farm used the parameters taken from that development's own glint and glare assessment, specifically single-axis tracking with an axis orientation of 180 degrees, and a maximum tilt angle of 60 degrees.</p>	cumulative assessment parameters for Muskham Wood Solar Farm.	

2.6 OTHER ISSUES

Table 2-6 Other Issues

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
2.6.1	RR / WR	Drainage impact on National Highways culvert	<p>Measures outlined in ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1B] [REP1-039] such as berms and filter strips within Work Area 1: Solar PV, combined with grassland under the PV panels will act to slow the rate</p>	<p>Within the proposed area opposite Weston Village, Moorhouse Beck flows from the site side of the A1 Trunk Road to what appears to be a National Highways culvert beneath the A1 and to the northeast. Any changes to the</p>	Under Discussion

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			<p>of surface water reaching watercourses, such as Moorhouse Beck, and therefore will not contribute to the double box culvert (displayed on Plate 9.5 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9] [APP-052], becoming overwhelmed. The specific locations of the targeted measures such as berms, will be confirmed during the detailed design phase of the Development, following the granting of the DCO.</p>	<p>surface water drainage arrangements have the potential to affect the capacity/operation of the culvert and will need to be reviewed when more details are available.</p> <p>In addition, proposals include ensuring appropriate ground level vegetation and active measures such as berms, stone filter drains and swales to slow the flow of run-off where appropriate, with such features to be maintained during the operational phase. Unfortunately, the features identified are in-principle/generalised and not related to specific areas of the site. Further information/drawings will be required for each area which has a boundary with the A1 Trunk Road showing details of the proposed works, including fence and landscaping positions, earthworks and the location of any surface water</p>	

Ref	Relevant Document	Description of Matter	Applicant’s Position	National Highways’ Position	Status
				drainage mitigation. It may be necessary to request cross-sections along either DCO/A1 boundary should the future works be significant in terms of changes to levels or works which could affect SRN assets.	

2.7 DRAFT DCO

Table 2-7 Draft DCO

Ref	Relevant Document	Description of Matter	Applicant’s Position	National Highways’ Position	Status
2.6.1	WR	Protective Provisions	The Draft Development Consent Order [EN010162/APP/3.1C] . includes at Part 5 of Schedule 13, Provisions for the Protection of National Highways. In line with Planning Inspectorate Guidance “Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders”. these provisions are	National Highways has a standard set of protective provisions which we require to be secured on the face of the DCO. These protective provisions seek to impose reasonable safety related controls on the exercise of powers to carry out works to National Highways assets, as well as works which are required under or over those	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
			<p>proportional to the impact of the Scheme on National Highways operations. The Scheme does not propose any construction works which impact the SRN. Therefore the protective provisions that have been included in the Draft Development Consent Order [EN010162/APP/3.1C]. have been adapted from National Highways standard form to reflect that there are no construction works impacting the SRN.</p>	<p>assets. We supplied the Applicant with National Highways' standard protective provisions in July 2025. A heavily amended version of those protective provisions was included in the draft DCO that was submitted with the application and subsequently accepted for examination by the Planning Inspectorate. It is not agreed at this stage that there are no construction works impacting the SRN.</p> <p>Where the Scheme includes works which pass over or under the SRN, National Highways requires various provisions to be included in its protective provisions (including the provision and approval of information, certification of works, the provision of security, road safety audits, control over the exercise of certain powers, insurance and indemnity provisions). These provisions (among others) are not included in the version that has been</p>	

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
				<p>included within the draft DCO and National Highways requires that they be reinstated to ensure the proper safe execution of works over the SRN and to ensure that National Highways is held harmless from third party development.</p> <p>An updated draft of the protective provisions has been received by the Applicant and NH will continue to discuss the protective provisions with the Applicant in an effort to reach agreement. An updated draft of the protective provisions which NH is prepared to accept and which reflects the last draft of the protective provisions sent to the Applicant is included at Appendix 1 to National Highway's WR (and justified in paragraph 6.5).</p>	

2.8 SCHEDULE 2 (REQUIREMENTS)

Table 2-8 Schedule 2 (Requirements)

Ref	Relevant Document	Description of Matter	Applicant’s Position	National Highways’ Position	Status
2.7.1	WR	Submission of details to National Highways in relation to the SRN (Requirement 5)	As noted above, the Development is not expected to lead to any significant effects on the SRN, and so the Applicant does not agree to NH’s request to approve any of the requirements. The Applicant has included NH as a consultee for the CTMP and for glint and glare matters that may relate to the SRN.	Requirement 5(1) and 5(2) should be amended to include an approval right for National Highways (in the same manner as the planning authority and county authority) in respect of amendments to approved documents, plans, details or schemes which relate to the safety of the SRN.	Under Discussion
2.7.2	WR	Submission of details to National Highways in relation to the SRN (Requirement 14)	As above.	As per ref 2.3.1 above, Requirement 14(1) should be amended to ensure that any detailed CTMP submitted should require NH’s approval insofar as the matters concerned relate to the SRN. This has recent precedent and was approved by the Secretary of State in relation to the Viking CCS Carbon Dioxide Pipeline Order 2025 and is required in this case specifically because the environmental statement submitted by the Applicant does not consider the construction and	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
				decommissioning impacts on the SRN – contrary to both IEMA guidance and the Applicant's scoping opinion. In the absence of environment assessment, National Highways requires greater control over the construction traffic management plan to ensure that the consequent effects on the SRN can be safely managed.	
2.7.3	WR	Submission of details to National Highways in relation to the SRN (Requirement 19)	The ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036] is not expected to relate to the SRN, and therefore it would not be necessary for NH to be stated in the requirement. We are seeking to discuss these matters and will provide an update in due course.	Given the fact that construction or traffic impacts on the SRN are not known, NH requests an approval right over the DRP in respect of matters relating solely to the SRN. The principle of and justification for this approach is the same as that for the CTMP in Requirement 14(1) above.	Under Discussion
2.7.4	WR	Submission of details to National Highways in	The Applicant notes the request for NH to approve Requirement 22. The Applicant considers that it would be appropriate to name	As set out in NH's relevant representation. NH understands that ES Volume 4, Appendix 16.1 Lint and Glare	Under Discussion

Ref	Relevant Document	Description of Matter	Applicant's Position	National Highways' Position	Status
		relation to the SRN (Requirement 22)	NH as a consultee, with NCC then remaining the approving authority. The Applicant considers that NCC can be relied on as acting reasonably, and would ensure than any representations made by NH on glint and glare matters that affect the SRN would be given appropriate regard. The Applicant considers that this position is appropriate and reasonable.	Assessment [EN010162/APP/6.4.16.1] demonstrates above tolerance impacts to parts of the SRN, requiring mitigation to be agreed. This mitigation is secured by Requirement 22(1). NH requests an approval right over the mitigation to be provided as part of a glint and glare assessment in respect of impacts to the SRN only – given the potential for safety impacts.	



3 SIGNATURES

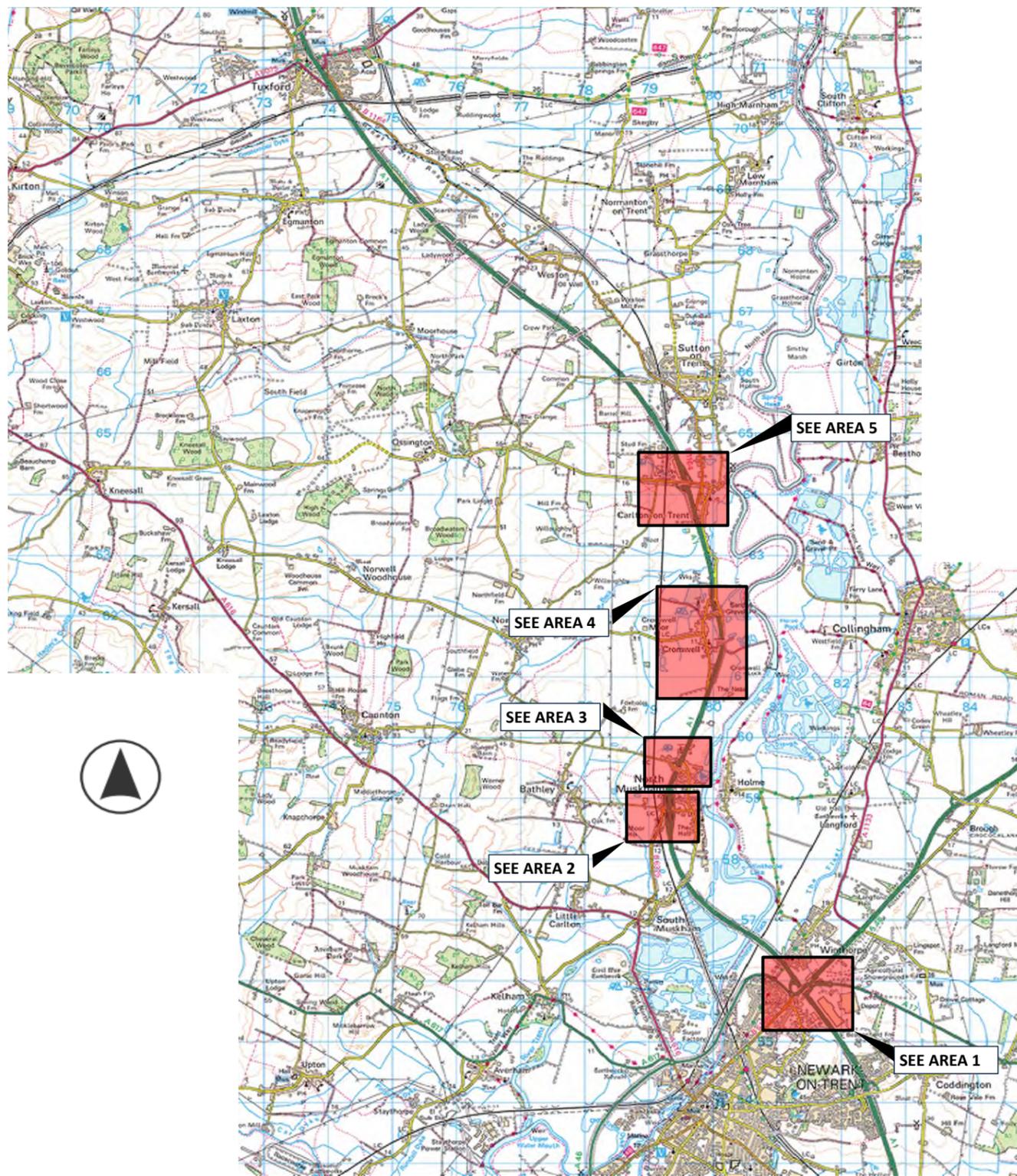
3.1.1 The above SoCG is agreed between the Applicant and National Highways, as specified below.

Duly authorised for and on behalf of Elements Green Trent Ltd	Name
	Job Title
	Date
	Signature

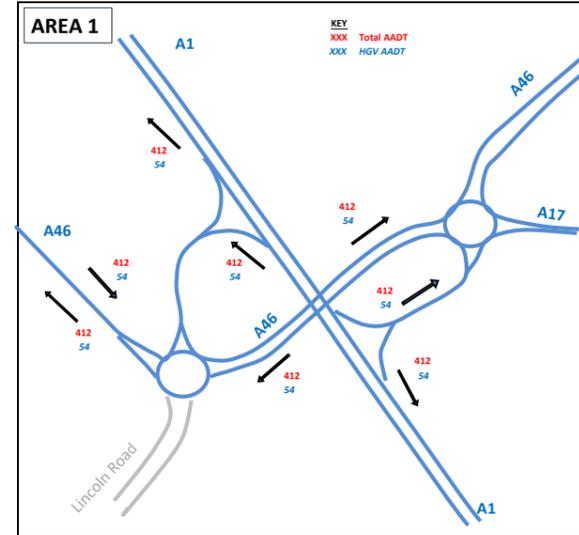
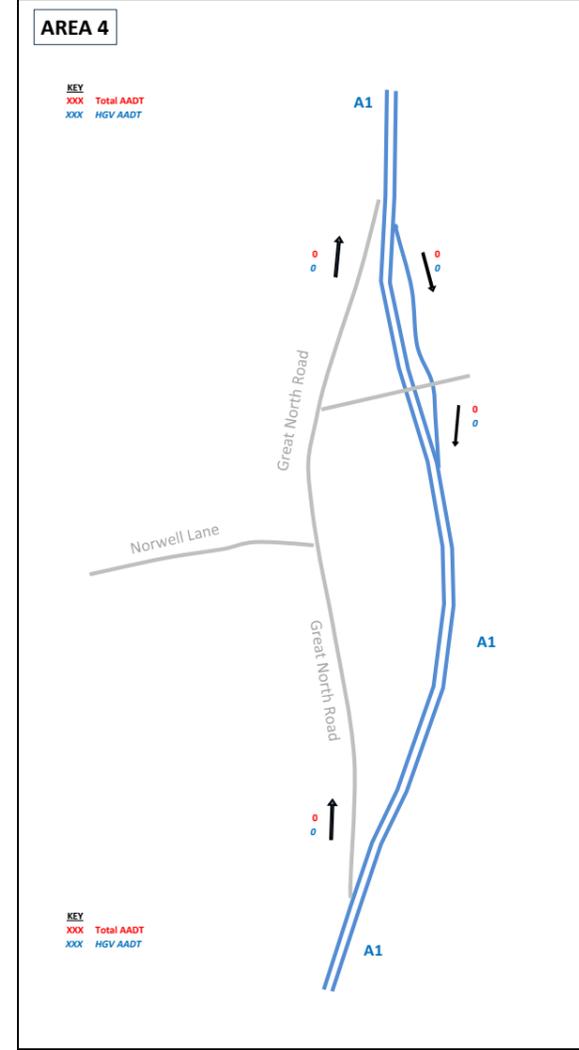
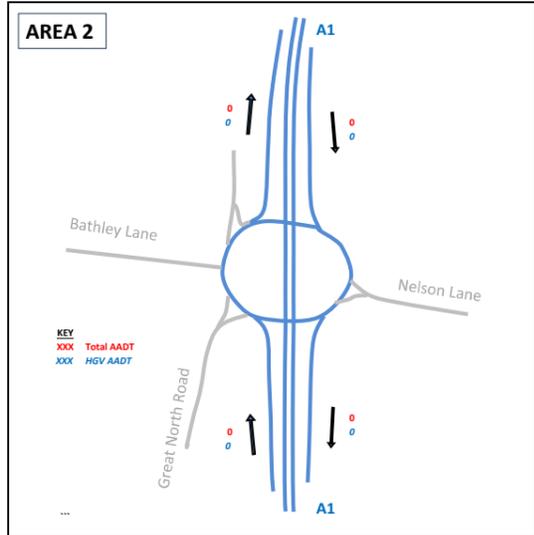
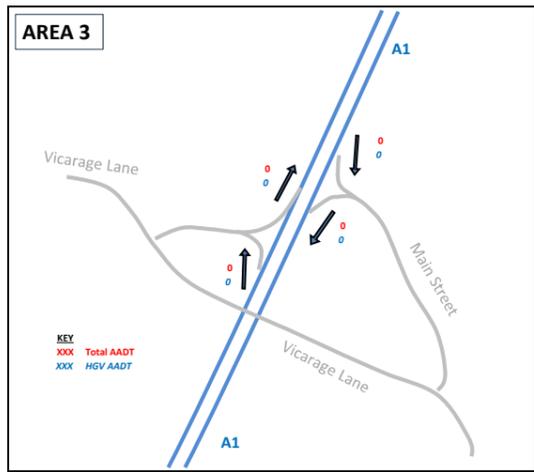
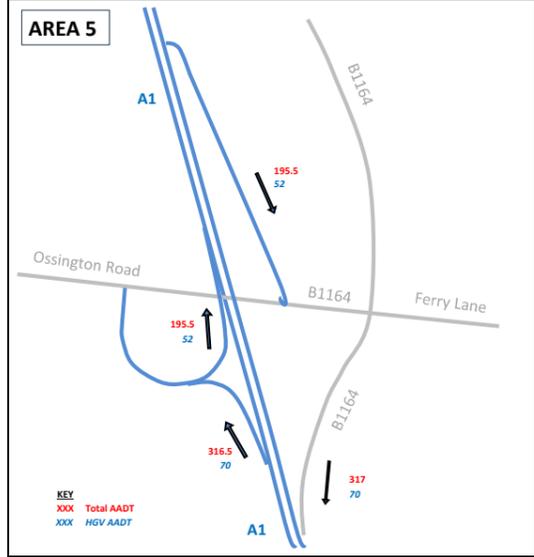
Duly authorised for and on behalf of National Highways	Name
	Job Title
	Date
	Signature



APPENDIX 1: CONSTRUCTION TRAFFIC FLOW DIAGRAMS



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Project:
GREAT NORTH ROAD SOLAR AND BIODIVERSITY PARK

Project:
**AADT CONSTRUCTION TRAFFIC FLOWS ON A1
 WORST CASE (100% Route North AND 100% Route South)**

Ref:
EN010162/APP

Date
09 December 2025