

Great North Road Solar and Biodiversity Park

Draft Statement of Common Ground with National Highways

Document Reference – EN010162/APP/8.4B

Revision number 3

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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
Issue 4	2/02/26	ES	Head of Planning	Updates to reflect NH comments
Issue 5	11/2/26	ES	Head of Planning	Updates to reflect NH comments
	14/02/2026	RC	Senior Associate (Pinsent Masons) on behalf of National Highways	Comments on issue 5
Issue 6	17/2/26	ES	Head of Planning	Updates to reflect NH comments

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
28/1/26	Meeting	Please refer to Appendix 1 for the agreed meeting minutes.
11/02/26	Email	Applicant issued SoCG to NH for review and comment
14/2/26	Email	NH issued comments on the SoCG to the Applicant

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	National Highways' Position	Applicant's Position	Status
2.1.1		Policy Compliance	NH has reviewed the further information provided by the Applicant and is now content that the Development accords with relevant policies within the NPSs.	The Applicant considers that the Development is fully in compliance with NPS EN-1, EN-3 and EN-5.	Agreed
2.1.2	RR	Assessment Methodology (including Study area)	NH has reviewed the further information provided by the Applicant and is now content that the Applicant's assessment methodology is appropriate. The A1 has now been included in the assessments as requested and the impact on the A1 is less than 10% and therefore acceptable.	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	Agreed

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<p>intimidation and highway safety should follow two rules:</p> <ol style="list-style-type: none"> 1. Include highway links where traffic flows are predicted to increase by more than 30% (or where the number of HGVs is predicted to increase by more than 30%); and 2. Include any other specifically sensitive areas where traffic flows are predicted to increase by 10% or more". <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>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<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>	
2.1.3	RR / WR	Development Access and Traffic Measures	<p>NH has reviewed the further information provided by the Applicant and is now content that the development access and traffic measures are acceptable. The impact of AILs has now been assessed and the submitted AIL report is accepted given the fact evidence has been provided which shows the A1 is suitable to accommodate the proposed largest vehicles associated with the development as well as detailing the proposed number of AILs. In addition, the report states that further detailed discussions and approvals will be agreed with National Highways</p>	<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</p>	Agreed

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<p>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 Detailed CTMP will be subject to consultation with National Highways before such details can be approved.</p>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<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</p>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<p>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>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	NH has reviewed the further information provided by the Applicant and is now content that the trip generation rates are appropriate. The proposed shift patterns set out in the CTMP and additional information provided on predicted hourly flows on	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	Agreed

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>the A1 is acceptable and within thresholds.</p>	<p>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 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</i></p>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<p><i>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</p>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<p>development peak hours being more closely aligned with the network peak hours due to the compressed working hours (10-hour shift).</p> <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>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status																																																						
				<p>Table 2 – Average Hourly Construction Trips on A1</p> <table border="1"> <thead> <tr> <th></th> <th colspan="17">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> </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> </tr> </tbody> </table>		Month																		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	Trips on A1	0	12	20	26	6	10	10	11	11	11	7	4	1	16	28	36	8	
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Trips on A1	0	12	20	26	6	10	10	11	11	11	7	4	1	16	28	36	8																																										
2.1.5	WR	Trip Distribution	<p>NH Current Position: NH has reviewed the further information provided by the Applicant and is now content that the trip distribution is agreed. The additional information provided in the revised ES Chapter alongside the traffic flow diagrams provided at Deadline 1 provides clarity on the development proposals impact on the A1 and are deemed acceptable by NH.</p>	<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 diagrams will show the traffic flows currently presented in Appendix 1 of this SoCG.</p>	Agreed																																																						
2.1.6		Mitigation Measures	<p>NH Current Position: NH has reviewed the further information provided by the Applicant and is now content that the mitigation measures are agreed. NH consider that the Detailed CTMP should be approved by NH in so far as it relates to the SRN.</p>	<p>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]</p>	Under Discussion																																																						

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<p>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]</p> <p>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] .</p>	
2.1.7		Assessment of Effects	NH has reviewed the further information provided by the Applicant and is now content that the assessment of effects is agreed	<p>Further information pertaining to trip generation, distribution and impacts on the A1 is provided within this Note and within the revised ES Chapter.</p> <p>The Applicant considers that the effects associated with traffic movements during construction and</p>	Agreed

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<p>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>	
2.1.8	RR	Construction Effect on the Strategic Road Network	NH has reviewed the further information provided by the Applicant and is now content that this matter is agreed	<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> <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</p>	Agreed

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				capacity assessment of the A1 not being necessary.	
2.1.9	RR	Operational Effects	Given the nature of the site and the proposed level of 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.	Noted.	Agreed
2.1.10	RR	Decommissioning Effects	NH has reviewed the further information provided by the Applicant and is now content that this matter is agreed	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	Agreed

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				Plan (DRP) [EN010162/APP/6.4.5.6A] [REP1-036].	
2.1.11	RR / WR	Other Matter - TEMPro growth figures	NH has reviewed the further information provided by the Applicant and is now content that this matter is agreed. Owing to the fact deliveries are proposed outside of network peak hours (where possible) and the additional/updated information provided on TEMPro in the revised ES Chapter now provides sufficient information and is accepted by NH.	<p>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.</p> <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 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>	Agreed

2.2 CONSTRUCTION ROUTES

Table 2-2 Construction Routes

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.2.1		Construction Routes	NH has reviewed the further information provided by the Applicant and is now content that this matter is agreed.	<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>	Agreed

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's 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	National Highways' Position	Applicant's Position	Status
2.3.1	WR	Strategic Road Network	<p>NH has reviewed the further information provided by the Applicant and is now content that this matter is agreed.</p> <p>NH consider that the Detailed CTMP should be approved by NH in so far as it relates to the SRN. See 2.7.2 for further details.</p>	<p>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</p>	Under Discussion

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's 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>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.3.2	RR	Signage on the Strategic Road Network	NH has reviewed the further information provided by the Applicant and is now content that this matter is agreed. The proposed approach to signage is accepted by NH owing to the fact no proposed temporary signage is proposed on the A1. National Highways seeks approval rights only for CTMP elements affecting the SRN as set out further at 2.7.2. As such, if proposals were to change, NH would be in a position to comment on signage when the detailed CTMP is reviewed.	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..	Agreed
2.3.3		Abnormal Loads	NH has reviewed the further information provided by the Applicant and is now content that this matter is agreed	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.	Agreed

2.4 DECOMMISSIONING TRAFFIC MANAGEMENT PLAN

Table 2-4 Decommissioning Traffic Management Plan

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.4.1		Relevant Consultees	National Highways notes that the current draft DCO requirement 19(1) does not provide for consultation with National Highways as the Applicant states. This right was given and is preceded in the recent Helios Renewable Energy Project DCO and Stonestreet Green Solar DCO decisions. Please see 2.7.3 for National Highways' position in relation to Requirement 19.	<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 [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/3.1D].</p>	Under Discussion

2.5 GLINT AND GLARE

Table 2-5 Glint and Glare

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.5.1	RR	Assessment of Effects and Mitigation Measures	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.	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. Mitigation measures are set out and secured that would then reduce effects to an acceptable level.	Agreed
2.5.2	WR	Other Matters- Receptors	NH made the following comments: 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 	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	Under discussion

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>commentary is provided regarding other receptors in the section heading.</p> <ul style="list-style-type: none"> Criteria noted does not align with aviation receptor requirements. <p>3. Road Receptors:</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. 	<p>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 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</p>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<ul style="list-style-type: none"> Dwelling 36 is discussed, dwelling 3 is not. <p>National Highways requests that Requirement 22(1) is 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>	<p>[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 'Green' 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> <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>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				<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 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 than any representations made by NH on glint and glare matters that affect the SRN would be given</p>	

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
				appropriate regard. The Applicant considers that this position is appropriate and reasonable.	
2.5.3		Other Matters – Cumulative Assessment	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 cumulative assessment parameters for Muskham Wood Solar Farm.	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 was the only area with receptors located within the cumulative study area. 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.	Under discussion

2.6 OTHER ISSUES

Table 2-6 Other Issues

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.6.1	RR / WR	Drainage impact on National Highways culvert	National Highways is content with the proposals based on protection incorporated within Part 5 of Schedule 13 of the draft DCO.	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 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.	Agreed

2.7 DRAFT DCO

Table 2-7 Draft DCO

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.1.7	WR	Protective Provisions	<p>The Applicant has included powers to carry out Work No. 8 (<i>which includes works to create accesses from the public highway; works to create and maintain visibility splays; works to street furniture; works to widen and surface existing highways; and the making and maintaining of passing places</i>) over two sections of the A1, as shown on Sheets 26 and 28 of the Works Plans [APP-019]. Accordingly, whilst it may be the Applicant's stated position that such works will not be carried out, the Order as drafted does allow for the Applicant to carry out Work 8 over the A1 in the event that such works were required.</p> <p>In circumstances where powers are sought by an Applicant to carry out works over the strategic road network, National Highways requires that its a standard set of protective</p>	<p>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 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>	Under Discussion

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>provisions are 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 assets. These controls include the provision and approval of design specification details, certification of the works, the provision of security in the form of bonds, the completion of road safety audits prior to works, network occupancy management, specific controls over the exercise of certain powers, insurance and indemnity provisions in the event that damage is caused to the strategic road network in the course of the works.</p> <p>The Applicant has included a version of National Highways' standard protective provisions, which strips out many of the core protections that National</p>		

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>Highways expects to be in place to allow for the withdrawal of its objection to the Application. To date, the Applicant has not provided any legally binding assurance that Work 8 will not be commenced over National Highways assets.</p> <p>If agreement cannot be reached, National Highways' position is that the copy of National Highways' protective provision included at Appendix 1 of National Highway's Written Representation [REP1-082] be included in the final made Order at Schedule 13 Part 5.</p>		

2.8 SCHEDULE 2 (REQUIREMENTS)

Table 2-8 Schedule 2 (Requirements)

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.7.1	WR	Submission of details to National Highways in relation to the SRN (Requirement 5)	<p>The Applicant is seeking powers to commence Work 8 over the A1 in two locations (see Sheets 26 and 28 of the Works Plans [APP-019]). The corresponding protections which National Highways typically expects in such circumstances have been removed from its standard protective provisions in Part 5 of Schedule 13 of the draft DCO.</p> <p>Work 8 is a direct interface with the strategic road network – any development taking place over an operational highway is as much of a safety concern as development taking place to the highway itself.</p> <p>Accordingly, any amendments to the Work Plans which relate to that specific interface (or any new interface) with the strategic road network – or indeed any changes to other certified documents which relate to the strategic road network such as the CTMP –</p>	<p>As noted above, the Development does not proposed any works on the SRN, and the ES has confirmed that the Development would result in any likely significant effects on the SRN. The Applicant therefore 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.</p>	Under Discussion

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>should be subject to National Highways direct approval.</p> <p>It is not sufficient that such changes should be subject to approval by a third party body that has no interest in, expertise in or relevance to the management and safety of National Highways assets. Even where National Highways was listed as a consultee for the purpose of discharging the requirement, if for whatever reason the Local Planning Authority did not respond to the Applicant with National Highway's position within the 10 week period (see Schedule 14, Paragraph 2(1) of the Order), our client's ability to be consulted and influence the discharge of the requirement will have been lost. This poses a serious safety critical risk to the strategic road network and is exactly why a direct approval role for National Highways with regard to matters relevant to the strategic road network is proportionate.</p>		

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>The Applicant has raised concerns around this creating a doubling of the approvals required and states that this is directly contrary to the Government's agenda to streamline and speed up infrastructure consenting.</p> <p>This argument is misleading for several reasons. Firstly, National Highways is arguably the most experienced developer of nationally significant infrastructure projects in England, having secured and developed dozens of development consent orders in recent years. It is acutely aware of the need to give timely approvals to allow development to proceed, having been in the Applicant's shoes in respect of many of these requirements for many years. Secondly, National Highways is mandated by its statutory licence to act as a facilitator to, and enabler of, development. The idea that National Highways would act as a blocker to development in this regard plainly misunderstands our client's role in the</p>		

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>development process. Thirdly, the argument directly pits the need to speed up infrastructure consenting against the need to protect existing infrastructure networks and the public that use them. These are not mutually exclusive concepts.</p> <p>National Highways does not accept that it should not be consulted on, have a say over or any form of control over changes to documents which lead to direct interfaces with its operational estate, where the corresponding protective provisions are not included in the Order. The Applicant is requested to put forward legally binding assurances with regard to Work No 8 as it interfaces with the strategic road network, or re-introduce the National Highways protective provisions to the draft DCO as they appear at Appendix 1 of our Written Representation [REP1-082].</p>		

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.7.2	WR	Submission of details to National Highways in relation to the SRN (Requirement 14)	As above and in addition, Requirement 14(1) should be amended to ensure that any detailed CTMP submitted should require National Highway's approval insofar as the matters concerned relate to the strategic road network. This is a minor and proportionate control which relates to a very limited part of the proposed scheme. This approach 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 there is a need to control the construction traffic interface between the Applicant's scheme and National Highways' A46 Newark Bypass DCO, which was granted consent on 1 October 2025 and which borders the southern limits of the scheme. Even where National Highways was listed as a consultee for the purpose of discharging the requirement, if for whatever reason the Local	As above.	Under Discussion

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>Planning Authority did not respond to the Applicant with National Highway's position within the 10 week period (see Schedule 14, Paragraph 2(1) of the Order), our client's ability to be consulted and influence the discharge of the requirement will have been lost. This poses a serious safety critical risk to the strategic road network and is exactly why a direct approval role for National Highways with regard to matters relevant to the strategic road network is proportionate.</p>		
2.7.3	WR	<p>Submission of details to National Highways in relation to the SRN (Requirement 19)</p>	<p>National Highways is requesting that the approval in requirement 19 is extended to include National Highways insofar as matters contained within the Decommissioning and Restoration Plan relate to the strategic road network. The Applicant is unable to give an accurate picture of the traffic and transport impacts affecting the strategic road network in this location at the time of decommissioning of the project.</p>	<p>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.</p>	Under Discussion

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>It is proportionate that National Highways has this very limited control to allow proper coordinate of the decommissioning of the scheme in a way that takes into account the state of the impacts to the strategic road network and the developments taking place around it, at that time.</p> <p>Even where National Highways was listed as a consultee for the purpose of discharging the requirement, if for whatever reason the Local Planning Authority did not respond to the Applicant with National Highway's position within the 10 week period (see Schedule 14, Paragraph 2(1) of the Order), our client's ability to be consulted and influence the discharge of the requirement will have been lost. This poses a serious safety critical risk to the strategic road network and is exactly why a direct approval role for National Highways with regard to matters relevant to the strategic road network is proportionate.</p>		

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
2.7.4	WR	Submission of details to National Highways in relation to the SRN (Requirement 22)	<p>NH understands that ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] demonstrates above tolerance impacts to parts of the strategic road network, requiring mitigation to be agreed. This mitigation is secured by Requirement 22(1). National Highways 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 to the travelling public. If above tolerance impacts are expected to parts of the strategic road network, it should not be for the planning authority to decide (whether National Highways is named as a consultee or not) that the mitigation proposed is suitable to ensure the safety of the public. Even with the benefit of a right to be consulted as part of the discharge of requirement 22, if for whatever reason the Local Planning Authority did not</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 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.</p>	Under Discussion

Ref	Relevant Document	Description of Matter	National Highways' Position	Applicant's Position	Status
			<p>respond to the Applicant with National Highway's position within the 10 week period (see Schedule 14, Paragraph 2(1) of the Order), our client's ability to be consulted and influence the discharge of the requirement will have been lost. This poses a serious safety critical risk to the strategic road network and is exactly why a direct approval role for National Highways with regard to matters relevant to the strategic road network is proportionate.</p>		



3 SIGNATURES

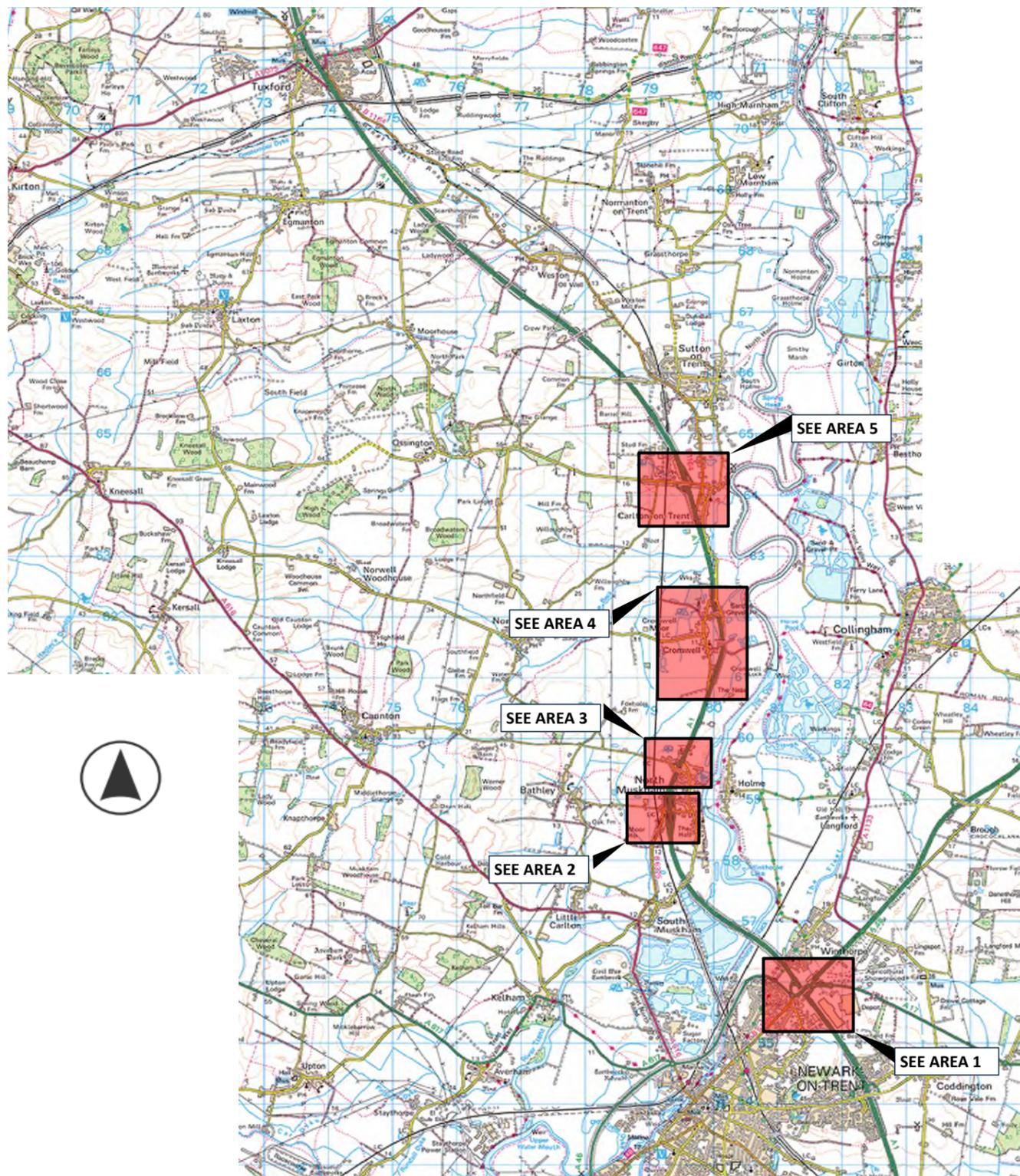
3.1.1 The above SoCG is agreed between the Applicant and National Highways, as specified below.

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

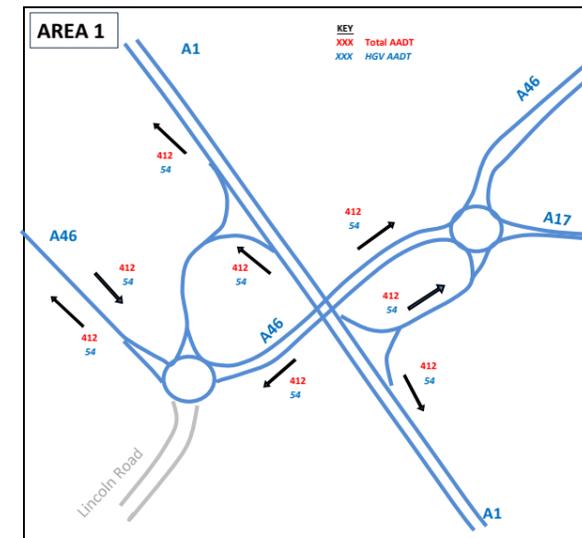
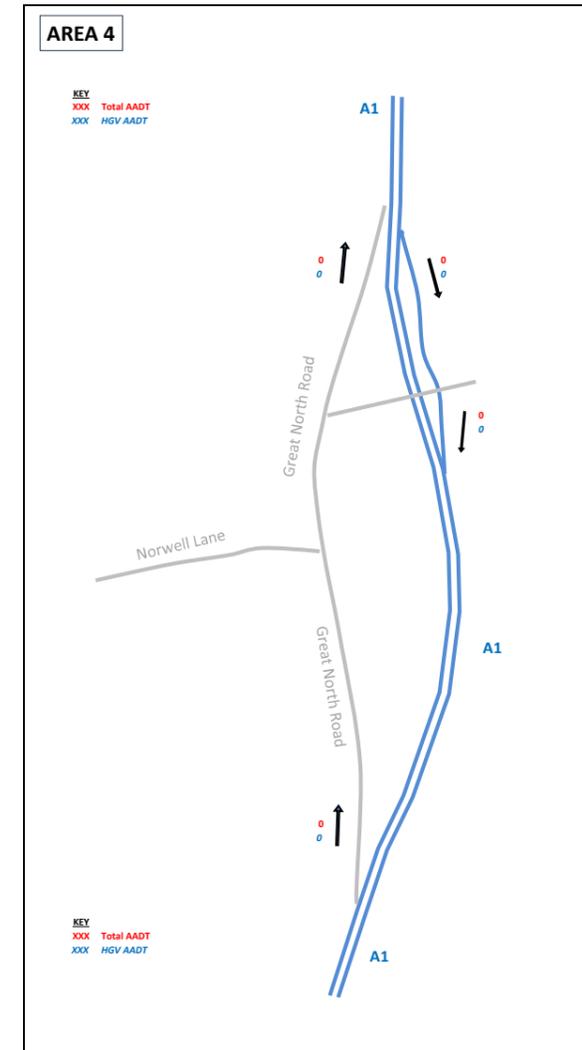
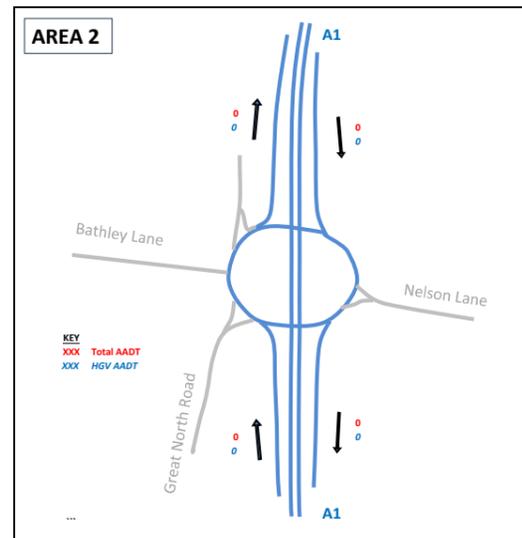
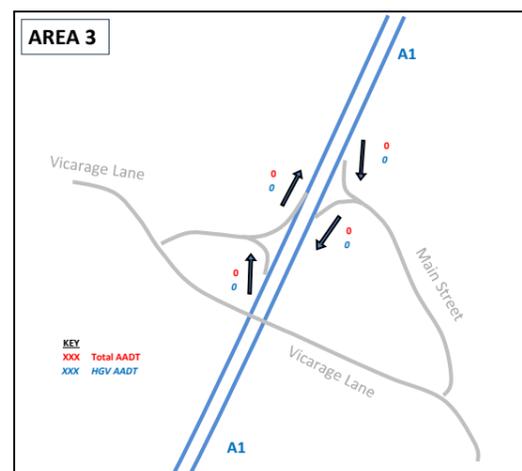
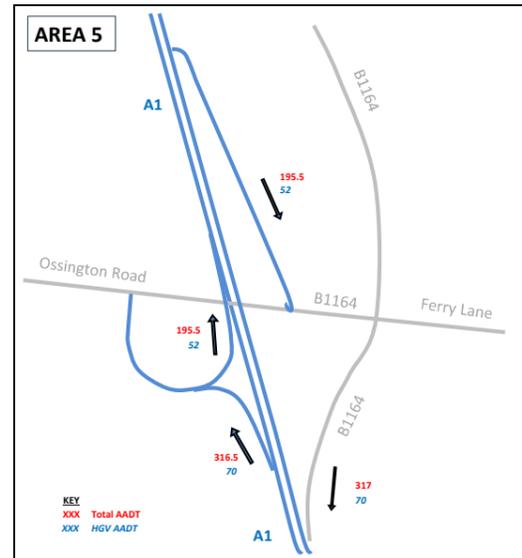
Duly authorised for and on behalf of National Highways	Name
	Job Title
	Date
	Signature



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