



Great North Road Solar and Biodiversity Park

Responses to Deadline 2 Submissions

Document Reference - EN010162/APP/8.23

February 2026

EP Rule 8(1)(c) Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

Table of Contents

1	Introduction	4
1.1	Purpose of the Report	4
1.2	Structure	4
1.3	Approach	4
2	DEADLINE 2 SUBMISSION – CATEGORY 1 STAKEHOLDERS	6
2.1	Overview	6
3	DEADLINE 2 SUBMISSION – CATEGORY 2 STAKEHOLDERS	8
3.1	Overview	8
3.2	Responses to Amanda Bird’s Deadline 2 Submission	9
3.3	Responses to BBS Law Ltd on behalf of Richard Gill, Lisa Gill and Drone Defence Services Ltd’s Deadline 2 Submission	13
3.4	Responses to Carlton-on-Trent Parish Council’s Deadline 2 Submission	27
3.5	Responses to Cllr James Gamble’s Deadline 2 Submission	36
3.6	Responses to Eakring Parish Council’s Deadline 2 Submission	47
3.7	Responses to Janet Carr’s Deadline 2 Submission	49
3.8	Responses to Janette Margaret Tate’s Deadline 2 Submission	56
3.9	Responses to JPAG’s Deadline 2 Submission	72
3.10	Responses to North Muskham Parish Council’s Deadline 2 Submission	100
3.11	Responses to Norwell Parish Council’s Deadline 2 Submission	103
3.12	Responses to Nottinghamshire Area Ramblers’s Deadline 2 Submission	110
3.13	Responses to Paul Mitchell and Pamela Gladwin’s Deadline 2 Submission	112
3.14	Responses to Richard Allarton’s Deadline 2 Submission	113

List of Tables

Table 1-1	SoCG Parties	6
Table 3-1	Responses to Amanda Bird’s Deadline 2 Submission	9
Table 3-2	Responses to BBS Law Ltd on behalf of Richard Gill, Lisa Gill and Drone Defence Services Ltd’s Deadline 2 Submission	13
Table 3-3	Responses to Carlton-on-Trent’s Deadline 2 Submission	27
Table 3-4	Responses to Cllr James Gamble’s Deadline 2 Submission	36
Table 3-5	Responses to Eakring Parish Council’s Deadline 2 Submission	47
Table 3-6	Responses to Janet Carr’s Deadline 2 Submission	49
Table 3-7	Responses to Janette Margaret Tate’s Deadline 2 Submission	56
Table 3-8	Responses to JPAG’s Deadline 2 Submission	72



Table 3-9 Responses to North Muskham Parish Council's Deadline 2 Submission	100
Table 3-10 Responses to Norwell Parish Council's Deadline 2 Submission	103
Table 3-11 Responses to Nottinghamshire Area Ramblers' Deadline 2 Submission	110
Table 3-12 Responses to Paul Mitchell and Pamela Gladwin's Deadline 2 Submission.....	112
Table 3-13 Responses to Richard Allarton's Deadline 2 Submission.....	113

1 INTRODUCTION

1.1 PURPOSE OF THE REPORT

1.1.1 This report provides the Applicant's responses to submissions from Interested Parties received at Deadline 3 in respect of the Great North Road Solar and Biodiversity Park (hereafter referred to as "the Development").

1.2 STRUCTURE

1.2.1 This document is structured as follows:

- Section 1 of this report sets out the purpose, structure and approach taken in the report;
- Section 2 signposts to the Applicant's responses to the Category 1 stakeholders with which the Applicant has development Statement of Common Ground (SoCGs).
- Section 3 provides the Applicant's responses to the Interested Parties' submissions made at Deadline 2.

1.3 APPROACH

1.3.1 A total of 22 submissions were submitted by Interested Parties ('IPs') at Deadline 3. These were submitted by:

- Nottinghamshire County Council
- Newark and Sherwood District Council
- Environment Agency
- Historic England
- Natural England
- Cadent Gas Ltd
- Norwell Solar Farm Steering Group
- Trent Valley Internal Drainage Board
- National Grid Electricity Distribution (East Midlands) plc (NGED)
- Amanda Bird
- BBS Law Ltd on behalf of Richard Gill, Lisa Gill and Drone Defence Services Ltd
- Carlton on Trent Parish Council
- Cllr James Gamble

- Eakring Parish Council
- Janet Carr
- Janette Margaret Tate
- JPAG
- North Muskhams Parish Council
- Norwell Parish Council
- Nottinghamshire Area Ramblers
- Paul Mitchell and Pamela Gladwin
- Richard Allarton on behalf of Moorhouse and Ossington Group

1.3.2 This report does not look to duplicate the Applicant's responses to the previous submissions in **Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]** and in **Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116]**, or **Responses to First Written Questions [EN010162/APP/8.22A]**. Where appropriate to avoid repetition the Applicant has sought to cross-refer back to responses provided in those documents, supplemented by additional information that has been entered into the Examination since those documents were prepared.

2 DEADLINE 2 SUBMISSION – CATEGORY 1 STAKEHOLDERS

2.1 OVERVIEW

2.1.1 The following stakeholders have provided submissions for which responses have been provided:

- Nottinghamshire County Council
- Newark and Sherwood District Council
- Environment Agency
- Historic England
- Cadent Gas Ltd
- Norwell Solar Farm Steering Group
- Trent Valley Internal Drainage Board
- National Grid Electricity Distribution (East Midlands) plc (NGED)

2.1.2 The Deadline 2 submission from Natural England has been received and incorporated into the latest version of the Statement of Common Ground with Natural England. The Applicant anticipates submitting the revised version of the Statement of Common Ground at Deadline 4.

2.1.3 The Applicant has been engaging via Statements of Common Ground (SoCGs) with a number of parties since Deadline 1, and has added the Trent Valley Internal Drainage Board and NGED as additional SoCG parties for this Deadline.

2.1.4 The table below sets out the parties which have submitted submissions at Deadline 2 with whom the Applicant is negotiating SoCGs.

Table 1-1 SoCG Parties

SoCG Parties	SoCG Reference	Location of response to Deadline 3 submissions
Nottinghamshire County Council (NCC)	8.1B	SoCG
Newark and Sherwood District Council (NSDC)	8.2B	SoCG
Environment Agency (EA)	8.3B	SoCG
Historic England (HE)	8.5B	SoCG

SoCG Parties	SoCG Reference	Location of response to Deadline 3 submissions
Cadent Gas Ltd	8.9B	SoCG
Norwell Solar Farm Steering Group	8.12B	SoCG
Trent Valley Internal Drainage Board	8.27	SoCG
National Grid Electricity Distribution (East Midlands)	8.28	SoCG

3 DEADLINE 2 SUBMISSION – CATEGORY 2 STAKEHOLDERS

3.1 OVERVIEW

3.1.1 The following stakeholders have provided submissions for which responses have been provided:

- Amanda Bird
- BBS Law Ltd on behalf of Richard Gill, Lisa Gill and Drone Defence Services Ltd
- Carlton on Trent Parish Council
- Cllr James Gamble
- Eakring Parish Council
- Janet Carr
- Janette Margaret Tate
- JPAG
- North Muskham Parish Council
- Norwell Parish Council
- Nottinghamshire Area Ramblers
- Paul Mitchell and Pamela Gladwin
- Richard Allarton on behalf of Moorhouse and Ossington Group

3.2 RESPONSES TO AMANDA BIRD'S DEADLINE 2 SUBMISSION

Table 3-1 Responses to Amanda Bird's Deadline 2 Submission

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP2-135]		
<i>Ecology and Biodiversity</i>		
1	<p><i>“Please see attached independent research regarding the effects of solar parks on wildlife. Even though this report took place outside of the UK it is still relevant in many ways with regards to wildlife movement and the effects on many different species. One of my concerns is the restriction of the free movement of deer etc which will inevitably increase road traffic accidents, the over grazing and over populated areas for deer. This will result at some point to reduce the number of deer by a ‘humane’ cull. It has already been seen with other solar parks and construction sites of deer being trapped in these metal fenced prisons.”</i></p>	<p>The Interested Party referred to an independent research regarding the effects of solar parks on wildlife, particularly on the movement of animals. The Applicant has addressed this concern in Table 3-1 Responses to Bathley Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], at page 13, where the Applicant confirms that the free movement of animals will be facilitated are through the fencing design, including mammal gates. Section 5.4.3.5 and Table 5.6 of ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048] provides the specification for mammal passes and gates. The location of these features will be refined based on the results of the pre-commencement surveys specified in ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3C].</p> <p>The Study criticises the ability to graze sheep or livestock within solar parks. The Applicant's position remains that this to be a realistic and deliverable form of ongoing agricultural use, and further responses are as set out in the Applicant's responses to NSDC Comments on ALC in Table 3-6 of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], at page 126.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP2-135]		
<i>Landscape and Visual</i>		
2	<p><i>“Whatever mitigation measures are put in place it will be minimum of 15 years before any difference is seen. This will still not mitigate the park in the Autumn and Winter months. Living in this area we see the effects far more than those who pass through or see the area on a map. Everything is visible, fields, gardens etc. This will lead to the cumulative impact on the area to become far more prevalent. Unless you are completely on a flat surface at the same gradient as the park it will be visible. For example Egmonton Solar Park on Weston road. If you drive past unless going past gate ways it is noticeable but slightly hidden by a hawthorn hedge. Though cross the road where the land slopes upwards and the site sticks out like a sore thumb. From literally every area you stand it is visible and this is 10 years on from its construction and it will never be hidden. As of yet I have not seen one solar park that has been hidden as per the applicants assessments and promises.”</i></p>	<p>The Applicant's position remains that the landscape mitigation proposed has been assessed in accordance with established methodology and that the resulting residual effects have been appropriately reported. The Applicant has addressed the consideration of topography in the responses to ExQ11.1.4 in the Responses to ExA's First Written Questions [EN010162/APP/8.22A], at page 111. Therefore, it is policy compliant with NPS EN-1.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP2-135]		
<i>Flood Risk and Drainage</i>		
3	<p><i>“The flooding around this area over since I moved here in 2012 continuously gets worse. The digging of a ponds to alleviate the situation only works until the pond is full and if that happens at 2am in the morning it will flow like a river over the top. I know this as we have dug a pond on our land 15m by 10m by 1.5m, this caused a greater issue than just allowing the water to flow down the garden. This is the only time our home was flooded. We have now had to add an overflow pipe to the pond to direct it into the dyke which then causes flooding lower down the road due to blocked drain pipes within the pipe. Which will be another issue when passing places are installed. They may state that they can solve an issue but what happens if it makes it worse, what happens to those affected, to the farmers fields whose crops may be lost to the impact of this huge error, to those who will suffer monetary losses due to insurance increases, loss of revenue etc. Who is going to monitor these drainage issues, who do we contact if and what is the plan if these issues make things worse”</i></p>	<p>The Applicant considers that Development will be safe, without increasing flood risk elsewhere. The Applicant’s approach to managing surface water runoff and reducing the potential for downstream impacts is stated within Table 2-3 <i>Responses to NCC Comments on Flood Risk and Drainage</i> of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116] and further supported by Table 4-4 <i>Flood Risks, Drainage and Water</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], at page 287 to 288. The measures for drainage will be included in the ES Volume 4, Appendix A9.3: Outline Drainage Strategy [EN010162/APP/6.4.9.3], provided at Deadline 3.</p> <p>To reiterate, commitments to ongoing monitoring and maintenance are set out in the management plans, which are secured by DCO Requirements in the Draft Development Consent Order [EN010162/APP/3.1D]. Failure to comply can be enforced by the local planning authority.</p> <ul style="list-style-type: none"> • ES Volume 4, Appendix A5.3: Outline CEMP [EN010162/APP/6.4.5.3C] • ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1C] • ES Volume 4, Appendix A5.5: Outline OEMP [EN010162/APP/6.4.5.5C]

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Amanda Bird [REP2-135]		<ul style="list-style-type: none"> • ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6B] <p>Each management plan includes a section on the Project Point of Contact which will allow members of the public to report potential issues, seek clarification of timing and other matters of potential relevance to the public during the construction, operation and decommissioning phase. These details will be set out in the final management plans and will be clearly visible at each site entrance for members of the public and stakeholders.</p>
4	<p><i>“Compulsory purchase for land belonging to others will cause stress, financial issues and also reduces, greatly, the risk of the land never going back to farmland or grassland. This then has to be weighed up against the argument that the land will return to its original state after 40 / 50 years. Therefore if a person does not wish to allow Elements green to use their land they should aspect this and only use the land that is freely offered to them to use. To take farmland from a farmer will leave them in financial troubles. Their fixed costs will be the same and to have land taken from them will effect their income.”</i></p>	<p>The Applicant remains the position that the land will be restored to a suitable use as secured by ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6B]. For detailed explanation, please see the Applicant's responses in <i>Table 4-8 Land Use</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], at page 313, under the section of 'Land use after decommissioning'.</p> <p>The Applicant has responded to the Interested Party's concern on the compulsory purchase in <i>Table 4-16 Responses to Amanda Bird</i> of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], at page 286. As noted in the Applicant's responses in <i>Table 4-3 Responses to Carlton-on-Trent Parish Council</i>, at Page 178, The Applicant maintains that it has undertaken a diligent land acquisition in accordance with standard practice.</p>

3.3 RESPONSES TO BBS LAW LTD ON BEHALF OF RICHARD GILL, LISA GILL AND DRONE DEFENCE SERVICES LTD'S DEADLINE 2 SUBMISSION

Table 3-2 Responses to BBS Law Ltd on behalf of Richard Gill, Lisa Gill and Drone Defence Services Ltd's Deadline 2 Submission

Para Ref.	Summary Position of Interested Party	Applicant's Responses
BBS Law Ltd on behalf of Richard Gill, Lisa Gill and Drone Defence Services Ltd [REP2-128]		
<i>Q10.1.1 - concerns regarding legitimacy, proportionality and necessity of CA/TP powers</i>		
1-3	<p><i>"1. Our clients, Richard Gill, Lisa Gill and Drone Defence Services Ltd (DDS), maintain concerns regarding the legitimacy, proportionality and necessity of the compulsory acquisition powers sought over Plots 115/16, 15/17 and 16/1 (Land Plans [REP1-004]). The Applicant has demonstrated flexibility elsewhere by removing land from the Order Limits yet continues to include Plots 15/16, 15/17 and 16/1 (a discretionary spur) despite their direct conflict with registered easements benefiting [redacted] and DDS. In our clients' view, the retention of Plots 15/16, 15/17 and particularly 16/1 fails the statutory tests set out by section 122 of the Planning Act 2008 ("PA 2008") because: a. The land is not essential to deliver the scheme; b. Reasonable alternatives exist,</i></p>	<p>The Applicant acknowledges the Interested Party's full submission and has provided responses in the following documents.</p> <p>In relation to the Interested Party's land interests and request to modify the draft DCO, the Applicant has responded previously to these matters in:</p> <ul style="list-style-type: none"> • Table 3-7 <i>Responses to Drone Defence Services Ltd of Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]</i>, pages 45 to 47. • Table 4-20 <i>Responses to BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd of Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116]</i>, pages 302 to 344 <p>Amenity impacts have been addressed at page 328 of the same Report, under the section 'Amenity'. Specific responses relating to effects on residential visual amenity at Caunton Lodge Farm are also provided at pages 314 to 319.</p> <p>The Applicant reserves the right to comment further when it has seen the Interested Party's submissions in response to Actions 1 and 3</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>which the Applicant has already applied in other areas; and c. The interference with private rights is disproportionate, given the severe operational and amenity impacts which will result from the overriding of easements exercisable by owners and occupiers. 2. The Environmental Statement, Chapter 4: Alternatives [APP-047], shows that the scheme has already undergone substantial refinement, including the removal of multiple areas from the Order Limits where technical, environmental or land-rights constraints made solar infrastructure unsuitable or unnecessary. Entire blocks were removed in the Cromwell, Kelham and Moorhouse areas on grounds of flood risk, archaeology and land availability. Tile Design Approach Document [REP1-018] confirms that the layout reflects iterative reduction rather than any fixed necessity for specific parcels. Plots 15/16, 15/17 and 16/1, described only as a minor discretionary spur with mitigation and host no scheme-critical infrastructure, therefore cannot be characterised as "required" for the scheme. Removal of similar parcels elsewhere has not compromised the development's 800MW generating capacity, demonstrating that</i></p>	<p>arising from Compulsory Acquisition Hearing 1 (CAH1), as stated in Written Summary of Oral Submissions from CAH1 and Response to Action Points [EN010162/APP/8.25].</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>inclusion of these plots is discretionary, not necessary, for the purposes of s122 PA2008. 3. These concerns have been raised in previous representations, but we emphasise that the Applicant has not provided a compelling case for including Plots 15/16, 15/17 and 16/1 when weighed against the harm to our clients' interests."</i></p>	

Q10.1.3 - Accuracy of the Book of Reference (BoR)

1a-1f	<p><i>"1. DDS proprietary easement interests have not been consistently recorded: a. DDS occupation and easement interests require BoR correction on Plots 15/16, 15/17 and 16/1 (Land Plans [REP1-004]). DDS lawfully occupies [redacted] under a Licence to Occupy dated 1 May 2023 permitting business use for R&D, testing, installation, operation of equipment/infrastructure and associated administrative functions on a periodic basis. DDS is therefore an "occupier" for BoR/PA2008 category purposes. In addition, by virtue of the First Schedule to the Transfer dated :30 September 1998, the "owners and occupiers for the time being of lot 4" [redacted] benefit from: i. free passage and running of water, soil, gas, electricity and other services through Service Media on/under/through the</i></p>	<p>The rights in the 1998 Deed of Transfer attach to and benefit the property, and will ensure for the benefit of successors in title to the property . Whilst those rights may be enjoyed by the occupiers of the property, that does not mean that those occupiers are themselves interested in the land, or that they have the power to sell and convey or release it. Accordingly, it is the owner of the property that has the category 2 interest in land for the purposes of section 56 of the Planning Act 2008, not the occupier.</p> <p>The property itself does not fall within the Order Limits therefore occupiers of it do not have a category 1 interest.</p> <p>Nor would a mere occupier of a property who has no interest in land have a qualifying claim for diminution in value of land pursuant to section 10 of the Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 so there is no basis for identifying DDS as a potential category 3 claimant either.</p>
-------	---	--

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>burdened land within an 80-year perpetuity period; and ii. rights of entry to lay/construct Service Installations on/under/through the property. DDS, as occupier of [redacted] benefits from these express easements. b. DDS are not identified in the BoR for Plots 15/16, 15/17 and 16/1 as Category 2 (persons with an interest in land), nor as Category 3 despite the fact that Articles 25 and 28 of dDCO [APP-015] may override or interfere with easements rights from which DDS benefits. The BoR should be updated to include DDS against Plots 15/16, 15/17 and '16/1. c. The Applicant proposes to install circa. 11 acres of panels as a spur within the 42 acre field abutting [redacted]. This minor design spur, which is not indispensable to the scheme, creates a direct conflict with registered easements and DDS operations. Accurate BoR recording is essential to reflect these interests and inform ExA's consideration of Articles 22-28 and CA necessity and proportionality. d. ES Chapter 4 [APP-047] confirms that land selection was guided by identification of lower-constraint areas, and parcels with greater conflict - whether environmental, technical or relating to rights - were removed during design evolution. The Design Approach Document [REP1-018] shows numerous parcels</i></p>	<p>No change is therefore required to the Book of Reference [EN010162/APP/4.3D].</p> <p>The Applicant notes the assertion that DDS occupies the property pursuant to a licence to occupy that permits 'business use for R&D, testing, installation, operation of equipment/infrastructure and associated administrative functions'. The Applicant has not been provided with a copy of that licence despite having requested the same. In any event, occupation of the property for those purposes is wholly at odds with the Interested Party's own assertions to the local planning authority.</p> <p>On page 306 of the Table 4-20 <i>Responses to BBS Law Ltd on behalf of Mr R Gill and Drone Defence Services Ltd</i> of Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], the Applicant drew attention to the Interested Party's recent planning application for a home office, which explicitly stated that the proposed office would not be used for any activity that would alter the <i>residential</i> character of the property. Planning permission has now been granted on 9 February 2026. In doing so, the planning officers' delegated report expressly replied upon statements from the Interested Party regarding the residential use of the property. An extract from the officer's report is copied below:</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>eliminated without affecting the Project's ability to achieve 800MW capacity. Against that background, inclusion of Plots 15/16, 15/17 and 16/1 despite existing express easements departs from the Applicant's stated design principles. Consistency with the Applicant's approach to remove parcels requires that easement corridors from which DDS benefits be treated in the same way. e. For completeness, the Applicant's proposed development on Plot 15/16 and the proposed mitigation on Plots 15/17 and 16/1 also overlap or burden parts of the same easement network benefiting DDS. These impacts reinforce the need for all three plots to be accurately reflected in the BoR under both Category 2 and Category 3. f. Accordingly, DDS seek the amendment to the BoR to record DDS on Plots 15/16, 15/17 and 16/1 as within Category 2 and Category 3. Clarity is also sought by way of dDCO response as to how Articles 25 and 28 would treat these easements in light of ExQ 1 queries on the drafting of Articles 22-28."</i></p>	<p><u>Principle of Development</u></p> <p>7.3. It is noted that objections have been received raising concerns in relation to the use of the application site due to comments made against the Great North Road Solar and Biodiversity Park National Infrastructure Project. The applicant has confirmed via an email that all land within the application site is in sole residential use in association with Cauntun Lodge Farm.</p> <p>7.4. As set out in Section 3 of the submitted Design, Access, Heritage and Flood Risk Statement, the proposed eco-pod would be used solely as a home office and not for any other activity.</p> <p>7.5. Given the existing use of the application site and the use of the proposed eco-pod, it is therefore considered that the proposal can be assessed as a form of householder development.</p> <p>7.6. Householder developments are accepted in principle subject to an assessment of a number of criteria sets out by Policy DM6 of the ADMDPD.</p> <p>The Applicant reserves the right to comment further upon the lawfulness in planning terms of DDS's use of the property and the order land, and of the installation of existing equipment after it has seen the Interested Party's submissions in response to Action 3 in the Written Summary of Oral Submissions from Compulsory Acquisition Hearing CAH1 and Response to Action Points [EN010162/APP/8.25].</p>

Q10.1.4 - DDS Interests, Category Classification and Effects of the Development

1a-3c	<p><i>"1. Plots of interest: a. DDS is the licenced occupier of and by virtue of the Transfer dated 30 September 1998 benefits from easement</i></p>	<p>See responses above. Furthermore, given the oral submissions made by the Interested Party at the CAH as reported in Written Summary of Oral Submissions from Compulsory Acquisition Hearing 1 and</p>
-------	--	---

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>rights. These easement rights engage the field south of [redacted] registered as Title NT332979 and identified on the Land Plans as Plot 16/1 (EN010162/APP/2.2B, sheet 16), as well as easement rights over Plots 15/16, 15/17. DDS relies upon its easement rights over the land to enable connections from [redacted] to sensors and infrastructure located on adjacent land outside the Order Limits and these rights are integral to the continued operation of the business. The proposed PV placement and PRow changes in and around this plot will directly impacts easements rights which allow for connections to services and sensor nodes. For example, Solar block W1 8.3 (Landscape Masterplan [APP-0!30]), which lies within Title NT332979, would materially interfere with the practical exercisability of those easement rights by introducing permanent solar infrastructure within the corridor required for service and data connections. The effect would be to materially limit DDS ability to connect to land beyond the Order Limits, notwithstanding that such land is not required for the development itself. 2. Category 2/ Category 3 status: a. DDS holds a Category 2 interest within the meaning of section 57 of the PA 2008, because it holds proprietary rights over land within the Order</i></p>	<p>Response to Action Points [EN010162/APP/8.25], the Applicant would note that DDS's proposed electricity connection which it proposes to install pursuant to the rights in the 1998 Deed of Transfer, are not to 'serve Lot 4' (i.e. the property) in accordance with the rights, but are to provide power to infrastructure which has been installed for the sole benefit of the research and development business operated by DDS.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>limits by virtue of express easements granted to the 'owners and occupiers for the time being' of [redacted] per the Transfer dated 30 September 1998. DDS is the lawful occupier under a Licence to Occupy dated 1 May 2023, and those easements are exercisable by DDS in that capacity. Further, Articles 25 and 28 of the dDCO contemplate the extinguishment/overriding of private rights. If granted, DDS may be entitled to make a relevant claim (per s57(4) PA 2008) and, therefore, also falls within Category 3. 3. How rights would be affected by proposed development: a. PV arrays/compounds/fencing on Plot 15/16 would materially interfere with the practical exercisability of the granted easement rights by introducing permanent solar infrastructure within the corridor required for service and data connections. The effect would be to add disproportionate costs to DDS ability to connect to land beyond the Order Limits, notwithstanding that such land is not required for the development itself. b. Additionally, Solar block W18.1, despite not sitting within Title NT332979 and not directly interfering with the easement rights to which DDS benefit, lies within DDS established operational flight volume and would introduce industrial infrastructure that triggers a 150-metre</i></p>	

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>separation buffer under applicable Civil Aviation Authority operational requirements. This would materially reduce the available lawful flight volume required for DDS activities. Solar block W18.1 may also adversely affect sensitive detection and monitoring systems by altering the local electromagnetic and reflective environment through the introduction of large-scale metallic surfaces, inverter stations and associated power cabling. DDS operates an evolving suite of sensors as part of an active research and development programme and relies on the preservation of a low-interference baseline environment. These effects are site-specific and cumulative and cannot be assumed to be mitigated through generic measures. c. Both the Design Approach Document [REP1-018] and ES Chapter 4 [APP-047] confirm that the design has been repeatedly refined to remove parcels where conflict with operational requirements or existing uses made development unsuitable. Plots 15/16, 15/17 and 16/1 are not identified anywhere as hosting required substations, BESS infrastructure, or essential cable routing. Solar block W18.3 is a non-essential extension into an area where neighbouring parcels have already been removed for heritage and technical reasons. The Applicant's</i></p>	

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>evidence shows that the scheme can be materially reduced without undermining its 800MW capacity. Interference with easements benefiting DDS is therefore not justified by necessity."</i></p>	
<p>Q10.1.9 - Impact of proposed development on services at the Property</p>		
<p>1-7</p>	<p><i>"[redacted] is a wholly off-grid residential property with no existing physical connections to electricity, telecommunications, water, sewerage or other utility networks. While services are presently provided independently on site, the lawful long-term residential viability of the property is expressly safeguarded by the easement rights granted by the Transfer dated 15 April 1998. Those rights benefit the owners and occupiers for the time being of Lot 4 and burden adjoining land. They exist specifically to ensure that [redacted] is not rendered functionally isolated by its rural location and retains the ability, to conned to external power, data and communications infrastructure should existing arrangements become unsustainable, inadequate or require augmentation. 2. The Applicant seeks to acquire the freehold and compulsory</i></p>	<p>See responses above.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>acquisition powers over land comprising Title Number NT332979, including Plot 15/16 (Land Plans [REP1-004], where approximately circa. 11 acres of ground-mounted solar PV panels are proposed, and Plots 15/17 and 16/1, where approximately circa. 30 acres of mitigation are proposed. The proposed development would materially interfere with the future exercisability of long-standing express easement rights across that land. That interference goes to the core functionality and lawful occupation of an existing dwelling and therefore directly engages the statutory tests for compulsory acquisition under section 122 of the PA 2008. 3. The Applicant's Environmental Statement (Chapter 4 - Alternatives) [APP-047] demonstrates that alternatives have been considered at a strategic and technological level. However, it does not demonstrate that reasonable alternatives to the compulsory acquisition of land and rights have been explored in respect of this specific parcels. In particular, there is no parcel-level assessment of whether solar infrastructure could be relocated, omitted or redistributed within the wider site, nor whether mitigation land could be re-sited, so as to avoid</i></p>	

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>interference with established third-party easement rights benefiting an existing dwelling. This is a material omission given that the land in question is proposed to accommodate only modular, non-site-specific solar PV infrastructure and associated mitigation, rather than scheme-critical or location-dependent works. 4. This omission is particularly striking given that the Applicant has demonstrated design flexibility elsewhere in the scheme. Solar panel blocks SR32 and SR33 have been reduced or removed for precautionary and unverified archaeological reasons, and Order Limits have been reduced in locations such as OR49 and OR53, which could have accommodated mitigation land. These are not isolated examples, but illustrative of a broader pattern of iterative scheme refinement and selective avoidance of constraints across the application site. They confirm that the scheme is capable of adaptation where constraints are acknowledged. No equivalent parcel-specific alternatives or avoidance exercise has been undertaken in respect of the Plots surrounding [redacted] despite known express easement rights, known residential sensitivity, and repeated pre-application</i></p>	

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>representations. 5. The Design Approach Document [REP1-018] and Environmental Statement (Chapter 4 - Alternatives) show that numerous parcels have already been removed where constraints arose, without impairing the Development's ability to achieve its generating capacity. At no point do these documents identify Plots 15/16, 15/17 or 16/1 as essential to the Development or necessary to secure the contracted export capacity. Redesign and removal of parcels has been repeatedly undertaken elsewhere without prejudice to scheme viability. The inclusion of these plots therefore represents a discretionary design preference rather than an unavoidable land requirement. 6. The Applicant has failed to demonstrate that compulsory acquisition of Plots 15/16, 15/17 and 16/1 is necessary, or that avoidance or modification has been exhausted such that compulsory acquisition represents a last-resort measure, as required by section 122 of the PA 2008. 7. This failure is compounded by the cumulative impacts arising from the retention of this land within the Order Limits. These include severe residential visual impacts as assessed in the RVAA [APP-</i></p>	

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>213], harm to the setting of [redacted] as a non-designated heritage asset, loss of privacy and outlook, and interference with the established residential enjoyment of the property. When taken together with the extinguishment of service easement rights, the cumulative effect on the use and long-term viability of [redacted] is substantial.”</i></p>	
8-9	<p><i>“In these circumstances, offers of mitigation or alternative provision cannot cure the Applicant's failure to satisfy the statutory tests. Compulsory acquisition powers cannot lawfully be justified by compensation or post-hoc accommodation where necessity and last resort have not been demonstrated. To permit compulsory acquisition in these circumstances would convert absolute proprietary rights into discretionary benefits contingent on the Applicant's future performance, which is inconsistent with the structure and purpose of PA 2008. It would also materially weaken the statutory safeguard in s122 by lowering the effective threshold for compulsory acquisition of land subject to established private rights, thereby normalising the use of compulsory powers for discretionary scheme design choices rather than</i></p>	See responses above.

Para Ref.	Summary Position of Interested Party	Applicant's Responses
	<p><i>unavoidable development requirements. 9. Neither the Statement of Need [APP-323] nor the Clean Power 2030 Action Plan ties the urgent national need for low-carbon energy to acquisition of any particular land parcel. The need case is strategic, not plot-specific. ES Chapter 4 confirms that scheme capacity is achieved through distributed solar areas across the Order Limits and is not contingent on acquisition of Plots 15/16, 15/17 and 16/1 or adjoining land. No evidence is provided that these plots are required to meet generation targets, grid efficiency or operational feasibility.”</i></p>	

3.4 RESPONSES TO CARLTON-ON-TRENT PARISH COUNCIL'S DEADLINE 2 SUBMISSION

Table 3-3 Responses to Carlton-on-Trent's Deadline 2 Submission

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]		
<i>Q 1.1.9 Planning Benefits</i>		
1	a) Renewable Energy <i>"Carlton-on-Trent Parish council has reviewed the figures provided by Elements Green and firmly believes the projection to provide energy for 400,000 homes is wrong."</i>	Concerns raised on the number of homes equivalent has been addressed. Please refer to the Applicant's responses to Action Point 1 of the hearing, as set out in Table 2-1 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].
1	b) Biodiversity net gain (BNG) <i>"The principle of producing renewable energy to reduce our reliance on fossil fuels and offset carbon emissions requires an in-depth analysis of the carbon that will be produced during production and installation of the project, and then an accurate calculation for BNG can be deduced. The data provided by the applicant does not stand up to scrutiny"</i>	Carbon saving and Biodiversity Net Gain (BNG) are separate planning considerations and should be assessed independently. BNG is a non-mandatory requirement for Nationally Significant Infrastructure Projects and is intended to compensate for biodiversity loss arising from the Development. Carbon saving, by contrast, relates to measures to reduce greenhouse gas emissions and address climate change impacts. Responses on carbon saving calculations and the assessment of greenhouse gas emissions arising from the Development are provided within Table 4-5 <i>General of Responses to Relevant Representations</i> [EN010162/APP/8.16A] [REP2-115], on page 296. To reiterate, the assessment of carbon emissions has been undertaken in accordance to

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]		
		<p>the best practice guidance contained within IEMA (2022)¹. The methodology and assumptions used to assess the carbon emissions and savings are explained in detail within ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15A] [REP2-030] and ES Volume 4, Appendix A15.1: Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1B], including the supporting technical note on GHG emissions calculations as presented in Appendix 2 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], on page 57.</p> <p>Responses on BNG calculations are provided within Table 4-2 <i>Ecology and Biodiversity</i> in the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 280. Further discussion of BNG is recorded in responses to ExQ4.1.3, at page 52 of the Responses to ExA's First Written Questions [EN010162/APP/8.22A], with ongoing engagement continuing to the satisfaction of NSDC, as stated at row references 2.4.5 and row ref. 2.4.11 of Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2B]. The Applicant maintains that the BNG methodology is robust.</p>
1	c) Economic, Educational and sustainable benefits	<p>ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] provides an assessment of the socio-economic impacts arising from the Development. The Applicant</p>

¹ Institute of Environmental Management and Assessment (IEMA) (2022). Assessing Greenhouse Gas Emissions and Evaluating their Significance 2nd Edition [Online]. Available at: https://www.iema.net/media/xmgpooopk/2022_iema_greenhouse_gas_guidance_eia.pdf

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]	<p><i>“Claims like job creation and economic output are described as "significant" or "moderate beneficial" but lack detailed numbers, timelines, or metrics for local uptake. The applicant argues that jobs will be created during the construction phase, these jobs are temporary, low-skilled or semi-skilled, and on most other schemes they have frequently been filled by non-local or transient labour rather than residents of the host communities”.</i></p> <p><i>“Following construction, the labour requirements will be significantly reduced and will not compensate for the loss of livelihood to the many farm labourers and associated business that rely on the current farming mechanism. We cannot see any short or long-term economic benefits.”</i></p>	<p>considers that the socio-economic benefits, including commitments to local employment, skills, and training, are supported by a robust assessment. The commitments to deliver economic and educational benefits are outlined within the ES Volume 4, Appendix A13.2: Outline Skills, Supply Chain and Employment Plan [EN010162/APP/6.4.13.2A]. All of these inform the policy testing as stated in the Planning Statement [EN010162/APP/5.4C], which assesses the Development against relevant planning policy and other matters the Applicant considers are likely to be important and relevant to the SoS's decision. As such, the Applicant considers that the stated benefits are justified.</p> <p>These concerns were raised in the Interested Party's Relevant Representation and the Applicant's responses are provided within Table 3-3 <i>Responses to Carlton on Trent Parish Council</i> of Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 31. The response summarises the number of the local net FTE jobs during construction and operation, and confirms that the stated figure already accounts for the loss of job related to the agricultural employment uses of the land. Further responses on this matter can be found within Table 4-13 <i>Socio-economics</i> of the same Report, pages 337 to 338, which summarises the Applicant's approach to support the community and local businesses through a targeted scheme of access to construction training and apprenticeships. The job creation programme will be delivered by the ES Volume 4, Appendix A13.2: OSSCEP [EN010162/APP/6.4.13.2A], and the detailed OSSCEP is</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]		
		<p>then secured in Requirement 17 of the Draft Development Consent Order [EN010162/APP/3.1D].</p> <p>Please also refer to the Applicant's policy position on this matter in response to LIR paragraph 15.5, provided in Table 3-8 <i>Responses to NSDC Comments on Socio Economics of Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116]</i>, from page 157 to 158.</p>
1	<p>"Educational: Apprenticeships and other forms of job training will not exist to residents unless locals are recruited, and as previously stated this is unlikely to happen."</p> <p>"Elements Green advocated during consultation that they would support schools visiting the solar park, delivered via Sherwood Forest Trust, to learn about energy production. When asked if they would provide funding to cover coach hire, the single controlling factor over the viability of a school visit, the answer was "No"."</p> <p>"There are no educational benefits to be gained from this project."</p>	<p>Section A13.2.1.2.1 of the ES Volume 4, Appendix A13.2: OSSCEP [EN010162/APP/6.4.13.2A] outlines the apprenticeship opportunities, and the final OSSCEP will then provide a detail measures of how the apprenticeships will be implemented and it is secured by Requirement 17 of the Draft Development Consent Order [EN010162/APP/3.1D].</p>
1	d) Enhanced landscape and public access legacy	The Applicant has provided responses to clarify the management of the permissive route and the responses are provided in Table 4-12 <i>Public</i>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]		
	<p><i>“Permissive means that the rights to the routes can be revoked at any time by the landowner, are there any guarantees that the permissive rights will be protected for the duration of the scheme? After the forty-year period the Permissive Paths will be closed to the public. What would happen to these routes should the operation phase of the solar farm extend beyond forty years. This is not therefore a benefit as described by the applicant.”</i></p> <p><i>“Applicant states that much of the screening will be by hedges, current hedges not removed will be allowed to grow taller. This is a change to the current vista and will prevent the enjoyment of walking in the countryside, as will the proposed tall wire fences – alternative cheaper double fencing options were suggested page 20 of our submission 10.12.25”</i></p>	<p>Rights of Way² of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115].</p> <p>Planting hedgerows is a best-practice approach as recognised in NPS EN-3. Hedgerows would be managed and panels set back an appropriate distance to ensure that: the hedgerows remain of a suitable maintainable height as dense hedges and do not become over-tall and thin at the base. The measure is secured in ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1C]. As such, the visual impact of planting hedgerow would be minimal.</p> <p>The Parish Council’s suggestion on the two-row deer fencing is acknowledged, and the Applicant has provided responses to Action Point 8 in Table 2-1 of the Written Summary of Oral Submissions from Issue Specific Hearing 3 and Response to Action Points [EN010162/APP/8.26].</p>
Q 4.1.10 Consideration of Mitigation Measures		
2	<p><i>“[...]it is acknowledged that specific mitigation measures were not considered during the</i></p>	<p>Shadow Habitats Regulations Assessment [EN010162/APP/5.3B] [REP2-015] was undertaken in accordance with the Planning</p>

² Note: New permissive routes are proposed as part of the Development. The total length of all proposed permissive routes has been updated, resulting in a minor reduction from 32.6 km to 32.2 km. All references to the total length of permissive routes across the Application documents were revised at Deadline 2.

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]	<p><i>Stage 1 HRA screening [AS-020]. The screening predominantly relies on project-wide and design based measures, without an assessment of the unmitigated baseline risk associated with the development, which is inconsistent with the legal principles established by the Sweetman judgment.</i></p> <p><i>This approach does not incorporate the requisite precautionary principle and may underestimate the likelihood of significant effects, particularly within the ecologically sensitive and functionally connected River Trent corridor. Furthermore, the screening does not fully address issues such as habitat loss, fragmentation, disturbance, temporal delays related to habitat creation, or the uncertainties surrounding the long-term achievement of Biodiversity Net Gain. It also falls short in adequately considering the cumulative effects arising from other large-scale developments in the vicinity. Consequently, the potential for likely significant effects on the areas cannot be definitively excluded at Stage 1, and an Appropriate Assessment is warranted to ensure compliance with the Habitats Regulations. Carlton-on-Trent Parish Council confirm that specific mitigation</i></p>	<p>Inspectorate advice for Nationally Significant Infrastructure Projects. It concludes that no likely significant effects have been identified for Birklands and Bilhaugh SAC or Sherwood Forest ppSPA. The project has the potential to adversely affect lampreys and this constitutes a likely significant effect on the Humber Estuary SAC/Ramsar.</p> <p>Cumulative effects were also considered and the conclusion is summarised in Section 4.1 of the Shadow Habitats Regulations Assessment [EN010162/APP/5.3B] [REP2-015]. Section 8.9 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8B] identified two other developments, the A46 Bypass and One Earth Solar Farm, which had scoped fish and the Humber Estuary SAC into their assessment of effects, including Shadow HRAs. The HRAs identified several potential impact pathways, including from works directly affecting the River Trent and its tributaries, which could give rise to likely significant effects on fish, including lampreys, over a large area and multiple watercourses in the River Trent catchment. The Appropriate Assessments considered a range of mitigation measures and concluded that the developments would not adversely affect the integrity of the Humber Estuary SAC.</p> <p>A Shadow Habitats Regulations Assessment [EN010162/APP/5.3B] [REP2-015] submitted at Deadline 1 clearly presents the information needed to inform an Appropriate Assessment in mitigating impacts to the Humber Estuary SAC/Ramsar, as set out in Section 4. The mitigation measures are secured in the various management plans such that the project will not adversely affect the Humber SAC/Ramsar either alone or in combination with other projects.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]		
	<i>has not been considered at the stage 1 screening</i>	
Q 11.1.12 Cumulative landscape and visual assessment		
5-6	<p><i>“Carlton-on-Trent Parish Council believe that ALL consented projects, and those already going through the planning process, should be considered by the applicant within the cumulative impact assessment (those already in the planning stage may be approved as in the instance of Kelham thus creating additional impact); we do not agree that anything already developed should be considered as baseline – for reasons such as those specified above in 4.1.10. – their effect is cumulative.”</i></p> <p><i>“Residents of Carlton on Trent will be unable to travel in any direction without seeing panels. There are no routes that could be taken as an alternative should anyone not wish to see panels. All routes would demonstrate ‘frequent sequential’, with this latter example of ‘more than frequent sequential’</i></p>	<p>The Applicant notes the disagreement with the cumulative LVIA baseline, and the concerns raised on the sequential visual impact for the Carlton-on-Trent residents. These issues have been responded within Table 4-3 <i>Responses to Carlton-on-Trent Parish Council</i> of the Responses to Deadline 1 Submissions Report [EN010162/APP/8.21] [REP2-116], from page 184 to 186.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]		
Q 13.1.6 Sustainable drainage system design		
7-8	<p><i>"[...] we request expanded site-wide infiltration testing, extending beyond the limited three trial pits per area, alongside robust modelling of long-term soil compaction resulting from construction activity and ongoing sheep grazing. The current conclusion of "negligible movement" (Section 6.1) is not adequately supported. In the absence of downstream modelling—particularly for impacts on Carlton-on-Trent—the application may fail to meet National Planning Policy Framework requirements to fully assess and mitigate flood risk from increased pluvial runoff. At present, we see little acknowledgement of the flood risk that the development poses to Carlton-on-Trent, and consequently a limited focus on meaningful mitigation of the pluvial flooding hazard that the village may face."</i></p>	<p>The village-specific drainage strategy proposed by the Parish Council is not a strategy related to the Development, and could not be considered to be something that the Applicant is responsible for.</p> <p>The placement of solar panels approximately 0.5 km west of Carlton on Trent is not considered to require infiltration testing to be undertaken, as the panels retain infiltration that would be similar to that of the existing agricultural uses.</p> <p>The Applicant is in discussion with Carlton-on-Trent Parish Council regarding their experience in terms of downstream flooding. The updates of the discussion is reported in Written Summary of Oral Submissions from Issue Specific Hearing 3 and Responses to Action Points [EN010162/APP/8.26]. The measures for drainage have been transposed from the FRA into ES Volume 4, Appendix A9.3: Outline Drainage Strategy [EN010162/APP/6.4.9.3], submitted at Deadline 3.</p> <p>The Applicant's responses on the flood risk issues in Carlton-on-Trent have been provided. Please refer to:</p> <ul style="list-style-type: none"> • Table 4-3 <i>Responses to Carlton-on-Trent Parish Council of the Responses to Deadline 1 Submissions Report [EN010162/APP/8.21] [REP2-116]</i>, page 170

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP2-119]		<ul style="list-style-type: none">• Table 3-3 <i>Responses to Carlton-on-Trent Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]</i>, pages 18 to 19.

3.5 RESPONSES TO CLLR JAMES GAMBLE’S DEADLINE 2 SUBMISSION

Table 3-4 Responses to Cllr James Gamble’s Deadline 2 Submission

Para Ref.	Summary Position of Interested Party	Applicant’s Responses
Cllr James Gamble [REP2-136]		
<i>Q 1.1.9 Planning Benefits</i>		
1	<p><i>“I do not agree that the proposed development would deliver the full range of planning benefits claimed by the Applicant, once the corrected evidence base is considered. While the generation of renewable energy is acknowledged, other claimed benefits—particularly economic and sustainability benefits—are overstated due to inaccuracies in the Environmental Statement (ES). The Applicant’s assessment of agricultural impacts is based on materially incorrect BMV data, with a confirmed 37% under-reporting of cumulative BMV land loss. When corrected, the scale and concentration of land loss raises serious concerns about food production, agricultural resilience, and the local economy, particularly in relation to the Newark Sugar Factory supply chain. In this context, claimed economic benefits must be weighed against: • loss of high-quality agricultural land; • displacement of productive cropping systems; • risks to a</i></p>	<p>The Applicant clarified at Deadline 1 and Deadline 2 that the Environmental Statements assess the likely significant environmental effects, both within the defined study area, and the potential for cumulative effects within the wider Zone of Influence. The EIA methodology is set out within ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045].</p> <p>ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] assesses the socio-economic implications of reduction in arable agricultural output arising from the change of land use from arable agricultural to the stationing of solar panels. The assessment is based on the Developments’ baseline scenario, and is not dependent on the cumulative BMV baseline. For the cumulative assessment within the ES Chapter, the scope of assessment agreed with statutory consultees is limited to the effects on temporary worker accommodation. Accordingly, revisions to the cumulative BMV land figure do not change the scope, methodology, or conclusions of the socio-economic assessment presented in ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056].</p> <p>The cumulative assessment within the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] [REP2-032] sets out that the cumulative solar projects will be wholly or mostly reversible, and</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble [REP2-136]	<p><i>nationally significant but locally concentrated food-processing facility; and • long-term impacts on rural employment and supply chains. In my view, the planning balance has been skewed by reliance on inaccurate baseline data. Until a corrected cumulative assessment and a proper evaluation of local agricultural economic impacts are provided, it is not possible to conclude that the benefits of the scheme clearly outweigh its harms.”</i></p>	<p>accordingly they will represent a temporary impact. In other words, the loss of BMV land cumulatively will represent a low magnitude effect, therefore, the cumulative assessment concludes that the cumulative effect on the BMV loss is not significant. Even when applying the revised cumulative BMV figures from 2350 ha to 3505 ha of BMV land, the underlying magnitude of the cumulative effect remain unchanged. As such, the conclusion of the cumulative assessment in ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] [REP2-032] is not affected.</p> <p>At the Development level, the assessment shows that there will be a temporary disturbance of 19.4 ha of BMV and, at worst case, the permanent loss of 4.5 ha of BMV. Further responses on this are detailed in in Table 3-8 of the Responses to Relevant Representations [EN010162/APP/8.16A], on page 51. When considered alongside the secured mitigation and soil restoration measures embedded within the management plans, the overall effect on BMV land is assessed as not significant in EIA terms. This conclusion remains valid in both the Development and cumulative context.</p> <p>In addition, the site selection process has demonstrated the Applicant's approach to minimise the use of BMV land wherever practicable, and provides justification where such land is required. This is consistent with relevant planning policy. The conclusion in the Planning Statement [EN010162/APP/5.4C] therefore remains unchanged.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble	[REP2-136]	
Q3.1.1	<i>BMV land during construction</i>	
2	<p><i>"I consider that significant effects arising from the disturbance of best and most versatile (BMV) agricultural land during the construction phase have not been adequately assessed in the Environmental Statement (ES). As set out in my Statement of Common Ground with the Applicant, it is now agreed that the Applicant's cumulative BMV calculations are materially inaccurate. This includes a confirmed omission of 211 hectares of BMV land at Beacon Fen and the complete omission of the One Earth NSIP from the cumulative assessment. When these errors are corrected, the cumulative area of BMV land affected increases from 2,350 hectares to 3,222 hectares—an increase of 872 hectares or 37%. This scale of under-reporting directly undermines the ES conclusions regarding the significance of effects, including during construction. Construction-related disturbance of BMV land is not neutral: soil compaction, loss of soil structure, drainage disruption, and prolonged storage of soils all carry risks that increase with scale and concentration. These effects are particularly relevant where multiple possible</i></p>	<p>The assessment of construction-related disturbance to soils and land quality is presented in Section 17.6.1 of the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] [REP2-032]. The Development's construction phase effects have been considered in terms of the solar PV arrays, construction compounds, access tracks, substation areas, BESS area(s), the cable route corridor, and wildlife sites or enhanced ecological mitigation areas. The construction-phase assessment is based on the EIA Assessment Scenario as described in Section 2.3 of the ES Volume 2, Chapter 2: Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2] [APP-045].</p> <p>A cumulative assessment of BMV land effects is then provided in Section 17.8 of ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] [REP2-032]. As explained in the responses in the row immediately above, the revised cumulative BMV baseline data do not change the conclusion presented in this ES Chapter.</p> <p>Therefore, the Applicant considers that the ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] [REP2-032] remains robust. The soil handling and measures set out within the ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2B] remain appropriate to manage and mitigate the effects on the agricultural land. A reassessment of construction and decommissioning impacts of the Development is therefore not necessary.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble [REP2-136]		
	<p><i>NSIPs are clustered within the same agricultural catchment, as is the case in Newark and Sherwood. Given the corrected figures, I consider that the ES has failed to assess the true magnitude of construction-phase effects on BMV land, and that these effects could reasonably be significant when considered cumulatively. This applies equally to the decommissioning phase, which involves similar large-scale ground disturbance across the same land resource. In my view, further mitigation would be required, including: • a revised and accurate cumulative BMV baseline; • a reassessment of construction and decommissioning impacts using that baseline; and • clear evidence that soil handling, restoration, and monitoring measures are capable of maintaining long-term agricultural productivity across a substantially larger affected area than currently assessed."</i></p>	
Q3.1.3 – Economic impacts of BMV land loss		
4	<p><i>"Yes. I have significant concerns regarding the economic impacts of best and most versatile (BMV) agricultural land that would be temporarily and permanently lost as a result of</i></p>	<p>Please refer to the Applicant's response on the local agricultural impacts matter within Table 4-4 <i>Responses to Councillor James Gamble of Responses to Deadline 1 Submissions Report</i> [EN010162/APP/8.21] [REP2-116], page 189 to page 191.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble	[REP2-136]	
	<p><i>the proposed development, particularly when assessed cumulatively. The Applicant has characterised agricultural land loss as a national issue, but this approach fails to reflect the highly localised economic dependencies that exist within Newark and Sherwood District. Most notably, the district hosts the Newark Sugar Factory, one of only four remaining sugar beet processing facilities in the United Kingdom. This facility is a major economic anchor, supporting direct employment, agricultural contracting, haulage, and a wide supply chain. Evidence set out in my Written Representation demonstrates that approximately 68–72% of sugar beet processed at Newark is sourced from within 25–30 miles of the factory—precisely the area experiencing a concentration of solar NSIPs, including One Earth, and Great North Road. Sugar beet production is dependent on Grade 1, Grade 2, and Grade 3a soils, all of which fall within the BMV category. The corrected cumulative loss of 3,222 hectares of BMV land therefore represents not just a land use change, but a structural risk to a locally concentrated agricultural processing economy. The Environmental Statement (ES) does not</i></p>	

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble	[REP2-136]	
	<p><i>assess: • displacement of beet cropping; • impacts on supply resilience to the Newark Sugar Factory; • knock-on effects on haulage, seasonal labour, and farm incomes; or • the risk of cumulative land loss shortening processing campaigns or undermining long-term viability. In my view, the absence of any processor-specific or local agricultural economic assessment is a serious omission. The economic impacts of BMV land loss in this location are neither abstract nor national; they are local, concentrated, and potentially significant.”</i></p>	
<p>Q4.1.2 – Environmental Impact Assessment (ecological methodology)</p>		
5	<p><i>“Yes. I consider that the methodological concerns raised by Newark & Sherwood District Council in relation to the Environmental Impact Assessment (EIA) for ecological receptors could reasonably lead to different conclusions regarding the magnitude and significance of effects. In particular, concerns relating to: • aggregation of distinct habitats into broad receptor groups; • limited transparency regarding baseline survey data; and • reliance on professional judgement where survey</i></p>	<p>Clarifications about the approach to the assessment methodology and baseline, including the aggregation of habitats, have been provided in within Table 3-2 the Responses to Deadline 1 Submissions [REP2-116]. The issue of aggregated habitats was resolved through constructive dialogue with Newark and Sherwood District Council at meetings held after the Deadline 1 submission. The Applicant’s approach keeps the assessment concise and avoids unnecessary repetition, as the construction effects on all important habitats are broadly similar. ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8B] will be submitted at Deadline 3 to clarify these matters, and the Applicant understand that this approach is agreed with</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble [REP2-136]	<p><i>coverage is incomplete all introduce a risk of under-reporting effects at both site-specific and cumulative scales. From an ecological perspective, the aggregation of habitats such as broadleaved woodland, native hedgerows, watercourses, and ponds reduces sensitivity within the assessment. These habitats differ markedly in ecological function, resilience, recoverability, and policy protection. Assessing them collectively risks masking impacts on higher-value or less replaceable features, particularly where mitigation is assumed rather than evidenced. This issue mirrors concerns I have raised elsewhere in the examination regarding agricultural land classification: where baseline data are incomplete or inaccurately represented, confidence in the resulting conclusions is reduced. In both cases, conclusions of “no significant effect” are heavily dependent on the reliability of underlying inputs. While professional judgement is an accepted component of ecological assessment, it must be supported by sufficiently robust and transparent baseline evidence. In my view, the approach taken increases the likelihood that the magnitude and significance of ecological</i></p>	<p>the Council and will be reflected in the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2B].</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble	[REP2-136]	
	<i>effects—especially cumulative effects—have been understated.”</i>	
Q4.1.3 – Biodiversity Net Gain (BNG) assessment		
6	<p><i>“Yes. I consider that the concerns raised by Newark & Sherwood District Council regarding baseline habitat surveys could materially affect the conclusions of the Biodiversity Net Gain (BNG) assessment. BNG outcomes are highly sensitive to baseline condition assessments, particularly where higher-value or more complex habitats are present. Where sampling of such features is limited, or where condition assessments rely on extrapolation, the resulting BNG calculations can change significantly if additional or more detailed data are introduced. From a postgraduate ecology perspective, I am particularly concerned where:</i></p> <ul style="list-style-type: none"> <i>• baseline surveys under-represent features of higher ecological importance;</i> <i>• condition scores are applied across aggregated habitat parcels; and</i> <i>• mitigation and enhancement assumptions are embedded early in the calculation process. In these circumstances, additional baseline data could reasonably result in lower starting units, higher losses, or</i> 	<p>Please refer to the Applicant's responses to NSDC LIR 9.1 – 9.2 within Table 3-2 <i>Responses to NSDC's Comments on Biodiversity (including Net Gain) and Arboriculture</i> which sets out the latest position that the level of survey effort, survey methods and desk-study are considered broadly appropriate by NSDC. Additional details on the BNG assessment have been provided at Deadline 2. Please refer to the latest version of the BNG submitted at Deadline 3 as ES Volume 4, Appendix A8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13B]. The Applicant's and NSDC's position on BNG are set out in Section 2.4 of the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2B].</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble [REP2-136]	<p><i>reduced confidence in delivery, thereby altering both headline BNG percentages and the credibility of longterm outcomes. I also note a broader consistency issue across the Environmental Statement. As with the BMV assessment— where acknowledged omissions and numerical errors led to a 37% under-reporting of cumulative impacts—the reliability of outputs is only as strong as the accuracy of inputs. Where baseline uncertainty exists, claims of high levels of net gain should be treated with caution. In my view, further baseline clarification would be necessary before the Examining Authority can place full reliance on the BNG conclusions presented.”</i></p>	
Q9.1 – Cumulative effects and methodology		
7	<p><i>“I consider that the Applicant’s approach to cumulative effects is inconsistent and undermines confidence in the Environmental Statement (ES) as a whole. The Applicant has excluded the One Earth NSIP from the cumulative BMV assessment on the basis that it was not included in the ES baseline. However, during the Issue Specific Hearing, the Applicant acknowledged that this omission</i></p>	<p>Please refer to the Applicant’s responses to ExQ1.1.10 in the Responses to ExA’s First Written Questions [EN010162/APP/8.22A], pages 13 to 14, which provides clarity on the flood alleviation measures that will be delivered through the NG+ scheme.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble [REP2-136]	<p><i>was an error, as One Earth is both consented and geographically adjacent to the proposed development. The same hearing confirmed a further numerical omission of 211 hectares of BMV land at Beacon Fen. In contrast, the Applicant has selectively included NG+ flood alleviation works within the cumulative assessment for the water environment while excluding them from other topic chapters on the basis of uncertainty. This selective approach is not methodologically robust. If uncertainty does not prevent inclusion of NG+ works for water impacts, it cannot reasonably justify exclusion of a known, consented NSIP such as One Earth from agricultural and cumulative land use assessments. The EIA Regulations require consideration of all existing, approved, or reasonably foreseeable developments, and this requirement has not been met. As a result, cumulative impacts—particularly on BMV land and agriculture—have been materially understated, and the ES conclusions on cumulative significance cannot be relied upon without a fully corrected and consistently applied cumulative assessment. Footnote: “NG+” refers to associated enhancement and community benefit works.</i></p>	

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Cllr James Gamble [REP2-136]	<i>Some NG+ flood alleviation measures are included in the cumulative water assessment, but NG+ is otherwise voluntary and separate from the core development baseline."</i>	

3.6 RESPONSES TO EAKRING PARISH COUNCIL'S DEADLINE 2 SUBMISSION

Table 3-5 Responses to Eakring Parish Council's Deadline 2 Submission

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP2-119]		
<i>Landscape and Visual</i>		
1	<i>"Landscape - There is a negative cumulative impact for Eakring residents and those travelling through Eakring by vehicle, bike etc along the quiet cycle route as defined by NCC and signed by brown signs, (there are solar panels along the entire route from Eakring through to Kneesall, Norwell Woodhouse, Ossington and Sutton on Trent). In addition whichever way people leave Eakring towards Newark they will come across panels. The cumulative impact on the unspoiled countryside that we hold dear has not been taken into account by Elements Green in their submission."</i>	The Applicant has responded to the concerns of the effects on views from PRow around Eakring within Table 4-6 <i>Responses to Eakring Parish Council of Responses to Deadline 1 Submissions</i> [EN010162/APP/8.21] [REP2-116] , from page 205 to page 207.
<i>Land Use</i>		
2	<i>"Soil Quality - the soil quality in all the fields around Eakring that are to be covered in solar panels is considered to be best and most</i>	The Applicant has responded to these comments in Table 3-8 <i>Responses to Eakring Parish Council of the Responses to Relevant Representations</i> [EN010162/APP/8.16A] [REP2-115] , on page 51.

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Eakring Parish Council [REP2-119]		
	<i>versatile and are categorised as soil index 2 which is very good.</i>	
<i>Flood Risk and Drainage</i>		
3	<i>“Drainage - the drainage is poor in places and the soil type is heavy Mercian mudstone therefore unless something is done to address this, it will cause compaction. Due to the high banks and overflowing ditches along the road, rainwater accumulates on the Newark to Eakring Road and has frozen, causing black ice.”</i>	The soils within the fields nearest to Eakring have been assessed as part of the ES Volume 4, Appendix A17.1: Agricultural Land Classification Survey [EN010162/APP/6.4.17.1] [APP-288] [APP-289], and the soil resource is summarised in Table SMP1 of the ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2B]. Only a small part of the land is physically affected by soil movement and the ES Volume 4, Appendix A17.2: Outline Soil Management Plan [EN010162/APP/6.4.17.2B] details measures to avoid compaction during all phases of the Development.

3.7 RESPONSES TO JANET CARR'S DEADLINE 2 SUBMISSION

Table 3-6 Responses to Janet Carr's Deadline 2 Submission

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr [REP2-137]		
<i>Q 1.1.9 Planning Benefits</i>		
1	a) Renewable Energy <i>"arguments have been well rehearsed regarding the geographical position of GNR being too far North to be suitable for efficient solar energy generation. It is quite possible that there will be no net benefit if manufacture, transportation, site construction and subsequent disposal of panels are taken into account."</i>	Responses on carbon saving calculations and the assessment of greenhouse gas emissions arising from the Development are provided within Table 4-5 <i>General of Responses to Relevant Representations</i> [EN010162/APP/8.16A] [REP2-115] , on page 296. This is further supported by the Applicant's responses to Action Point 7 of the hearing, as set out in Table 2-1 of <i>Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points</i> [EN010162/APP/8.19] [REP1-068] , at page 45. The Applicant then provides a calculation of the greenhouse gas (GHG) emissions in Appendix 2 of the document, on page 57.
2-3	b) Biodiversity net gain (BNG) <i>"Ossington has a unique combination of a larger than average area of woodland and mature trees (ex-parkland), a lake and wild areas left as a result of the abandonment of much of the former airfield's infrastructure and the original gardens of Ossington Hall. This has resulted in very healthy populations of most British mammals (e.g. all species of deer, most raptors, Red List ground nesting birds, 10</i>	The Applicant considers that the biodiversity impact on the protected species has been assessed and no likely significant effects are identified in the ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8B] . Please refer to the responses in Table 4-2 Ecology and Biodiversity Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115] . The Applicant also notes that the Interested Party provided submission on behalf of Ossington Solar Concerns group at Deadline 1 on these matters, which have been responded to within Table 4-13 <i>Responses to Ossington Solar</i>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr	[REP2-137]	
	<p><i>species of bat including the extremely rare Barbastelle, etc), as well as field and woodland plant species. Many of these would be displaced if the solar development is allowed due to disturbance, lack of range and ability to hunt and/or feel safe.</i></p> <p><i>“Loss of arable farmland would mean that the soil would not be regularly disturbed, which allows foraging by birds and animals and seeds to germinate and grow. As a result, BNG is likely to decline rather than improve.”</i></p> <p><i>“Soil compaction is likely to result from contractors’ vehicles travelling over land multiple times each year to service and clean panels and equipment, and also to find the projected sheep flocks coralled within the panelled areas. Ossington is situated on the Mercia Mudstone clay soil, which requires regular cultivation to prevent soil compaction. Compacted soil becomes more susceptible to run off, which is both damaging to soil structure and fertility as well as to any nearby human infrastructure”</i></p>	<p>Concerns group of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], on page 258.</p> <p>In terms of the surface runoff in Ossington, or in Ossington Road, The Applicant has set out a response to the Relevant Representation regarding this issue at Table 3-3 of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115] on page 287. Responses on the soil management please refer to Table 4-8 Land Use of the same Report, on page 312. The Applicant has reached an agreement with Natural England on the soil handling and management as stated within Statement of Common Ground with Natural England [EN010162/APP/8.4A] [REP2-096] and Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2B].</p> <p>In relation to BNG, all habitats and species have been appropriately valued. The Development will deliver a minimum of 10% gain in habitat, hedgerow and watercourse units and deliver positive outcomes overall and align with national and local policy objectives.</p>
4	c) Economic, Educational and sustainable benefits	ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] has been prepared by RPS, a

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr	[REP2-137]	
	<p><i>“for other areas of concern (wildlife, landscape etc) professional bodies have been consulted by EG. Why has there been no consultation with agricultural professional organisations with regard to economic benefits or otherwise?.”</i></p>	<p>professional socio-economic consultants on behalf of the Applicant. The assessment is informed by a range of ES chapters, including ES Volume 2, Chapter 17: Agricultural Land [EN010162/APP/6.2.17A] [REP2-032] which was prepared by specialists who holds appropriate professional qualifications to this matter.</p>
5-6	<p>d) Enhanced landscape and public access legacy</p> <p><i>“Enhanced landscape - in view of the above comments, and the planned destruction of certain areas (part of the mature woodland between Ossington lake and Moorhouse Road for cable laying for example), it is again very unlikely that anyone would conclude that the local landscape will be enhanced. Public Access - will be constrained by the closure of much of the open areas in the parish, the erection of security fencing and surveillance cameras. Existing footpaths will be extinguished, and therefore will be unlikely to be reinstated at the end of 40 years. Public access will certainly not be enhanced.”</i></p>	<p>Please refer to Table 4-13 <i>Responses to Ossington Solar Concerns</i> group of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], on page 256.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr	[REP2-137]	
Q 11.1.12 Cumulative landscape and visual assessment		
7	<p><i>"I am fully in agreement with the Joint Parishes Action Group and others regarding cumulative impact. Because of the huge proliferation of potential solar developments in this and neighbouring areas, consideration of the cumulative effect must be given serious consideration. Not only will residents find themselves living in an industrialised area, they will have to travel through it on a daily basis with resultant effect on their mental health. Ossington is an extremely rural parish (until relatively recently most inhabitants worked either for Ossington Estate or on local farms), and has never been a part of any industrialised landscape. Therefore to live in such altered circumstances would be totally alien and is bound to have an effect on mental health. Local resident Richard Allarton, together with Rosamund Nicholson, details local journeys in his submission, demonstrating the sequential cumulative impact of travelling in any direction from Ossington. It will be impossible to leave the village in any direction without a view of GNR panels or those planned for Bathley Hill and beyond. As most of the properties in</i></p>	<p>The Applicant acknowledges the concerns raised regarding cumulative landscape and visual effects in Ossington, and referred to the submission made by Richard Allarton.</p> <p>Appendix A of the submission made by Richard Allarton identifies four routes that cross the Order Limits:</p> <ul style="list-style-type: none"> • R1: From Moorhouse via Ossington Road to Carlton-on-Trent • R2: From Great North Road, crossing the A1 and continuing along Weston Road/Moorhouse Road, to Moorhouse. • R3: From Weston touching Great North Road, via Wadnall Lane and crossing the A1 to Moorhouse. Emphasising that the walk will be abutted against security fencing. suggesting that it is also a bridleway. • R4: From Moorhouse around Ossington Airfield and to the A616 <p>The additional LVIA figures presented within Appendix C of Responses to ExA's First Written Questions [EN010162/APP/8.22A] shows that, prior to mitigation and planting matures , effects on users of public rights of way along the four identified routes during construction and early operation would range from major/moderate adverse to moderate adverse for local road users. Once mitigation planting matures, these effects are expected to reduce to moderate adverse to moderate/minor neutral, although the eastern section of Route R1 would remain major/moderate adverse.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr	<p>[REP2-137]</p> <p><i>Ossington are tenanted, they would then become harder to let causing an already small village (c.100 inhabitants) to contract still further."</i></p>	<p>Visual effects on Ossington Airfield are specifically addressed within Table 4-13 <i>Responses to Ossington Solar Concerns group</i> of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], pages 256 - 257. This confirms that the airfield is classified as ordinary farmland for policy purposes. It further suggests that, once mitigation planting has matured, increased enclosure from hedgerows would reduce effects to medium-scale adverse, with no significant residual effects.</p> <p>In relation to policy on sequential assessment, the Applicant refers to responses to ExQ11.1.1(2)(c) in Responses to ExA's First Written Questions [EN010162/APP/8.22A], pages 124–125, together with the Applicant's responses to NSDC LIR 8.27 – 8.39, in Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], pages 78 to 79. Sequential assessment has been undertaken both at site level and across the agreed 2 km LVIA study area, incorporating all operational and consented projects.</p> <p>Sequential assessment requires consideration of how the experience of routes through the landscape pass the other developments, that may influence the effects experienced from the proposed development, and the Applicant confirms that this has been appropriately addressed within the LVIA.</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr	[REP2-137]	
Q 13.1.6 Sustainable Drainage System Design		
8-9	<p><i>"Whilst I have no specialist knowledge of this subject, I have been involved in farming all my adult life, most of it on clay soil. It is imperative that there should be design and planning for drainage. The impermeability of clay, particularly the local heavy Mercia Mudstone, very soon results in run off after heavy rain. Farmers locally regularly perform mole drainage in their fields. This involves a bullet shaped metal 'mole' being pulled through the soil by a tractor, particularly heavy clay, to improve drainage and aeration, prevent waterlogging and help crops to grow by channeling excess surface water to ditches or existing piped field drains. Clay soil that lays undisturbed for 40 years is at a much greater risk of compaction and therefore excessive run off, resulting in a greater flood risk in the area.</i></p> <p><i>Another aspect of the scheme to consider is the likely damage and compaction of roadside verges due to the increase in volume and size of traffic. This compaction will add to surface water problems and may well compromise any of the utilities (water, electricity, fibre) that lie</i></p>	<p>The type of soils and soil conditions are recognised within the baseline conditions and inform both the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C] and ES Volume 4, Appendix A9.3: Outline Drainage Strategy [EN010162/APP/6.4.9.3].</p> <p>The Development does not introduce extensive impermeable surfaces. Cable installation will be temporary and below ground, with land reinstated following construction. Areas with solar arrays will be managed through RSuDs techniques, such as grassland beneath the PV arrays. The use of grassland and wider vegetation planting within and around the PV arrays provides a significant betterment than the existing agricultural scenario and as a result will not increase surface runoff.</p> <p>Additionally, it should be noted that the Development is likely to provide beneficial effect on surface water run-off rates compared to the baseline agricultural scenario, as the fields within the Site will not, for the duration of the Development, be:</p> <ul style="list-style-type: none"> • Ploughed or furrowed; • Left without vegetation cover for long periods in the winter; and • Regularly traversed by heavy farm machinery. <p>The works could provide opportunities to improve soil structure and drainage during reinstatement, rather than leaving land undisturbed and compacted. The Applicant refers to the responses set out in Table 3-3</p>

Para Ref.	Summary Position of Interested Party	Applicant's Responses
Janet Carr [REP2-137]	<p><i>beneath. This additional risk should be examined and assessed, and a strategy developed. Particularly busy 'pinch points' and access areas should be reconsidered with this in mind. In Ossington examples would include access onto the former airfield site on Moorhouse Road, and gateways along Ossington Lane (from Sutton) that are already subject to damage and subsidence by use as passing places. Local roads are mostly very narrow lanes, unsuitable for the amount and width of traffic now, never mind the potential 5000% increase mentioned within the application."</i></p>	<p>Responses to Carlton on Trent Parish Council on these matters, pages 22–23. Measures to manage and monitor runoff and soil quality are secured in the ES Volume 4, Appendix A5.3: Outline CEMP [EN010162/APP/6.4.5.3C].</p> <p>Where works take place at access points or passing places, appropriate drainage measures will be incorporated as part of detailed design, which will adhere to the approved oCEMP as secured in Requirement 12 of the in Schedule 2 to the Draft DCO [EN010162/APP/3.1D].</p> <p>The Applicant has set out a response to issues raised relating to the construction traffic within Table 4-14 <i>Traffic and Access</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 341. It summarises that the construction routes and access points have been designed to avoid any disruption to the local road network where possible.</p>

3.8 RESPONSES TO JANETTE MARGARET TATE'S DEADLINE 2 SUBMISSION

Table 3-7 Responses to Janette Margaret Tate's Deadline 2 Submission

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]		
Q 1.1.9 Planning Benefits		
1	<p>a) Renewable Energy</p> <p><i>“The development is presented as a major step forward for clean energy, but the reality is far less convincing. The proposal overstates its contribution to renewable energy generation • The site selection appears driven by land availability rather than strategic suitability, The sheer size of the site means losing vast areas of productive farmland that have shaped the character and purpose of this area for generations at a time when food security is becoming increasingly important. • The intermittent nature of solar generation means the scheme offers no firm capacity, meaning the benefits are uncertain while the impacts on residents are guaranteed. The disruption from construction, heavy machinery, and land disturbance will be felt directly by those of us who live nearby. • The carbon footprint of construction, transport, and land disturbance is</i></p>	<p>Planning Statement [EN010162/APP/5.4C] addresses the planning balance and the weight that should be given to residual adverse effects arising from the Development. Need for the development alongside with the location of development, site selection and the size of the development are noted and a response was provided within Table 4-11 <i>Principle of Development</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 327.</p> <p>Concerns on construction effects to road users and residents are noted and responses can be found in the following sections of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]:</p> <ul style="list-style-type: none"> • Table 4-10 <i>Noise and Vibration</i>, page 324 to 325 • Table 4-14 <i>Traffic and Access</i>, page 341. • Table 4-12 <i>Public Rights of Way</i>, page 333 to 336 <p>Temporary disturbance of soils and land quality are noted and responses is provided in Table 3-8 <i>Responses to Eakring Parish Council</i>, at page 51, of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>brushed aside, leaving us unsure whether the project will ever deliver a genuine environmental benefit. The carbon payback period is unclear, particularly given the scale of land disturbance, construction emissions, and the embodied carbon of imported panels. Overall, the renewable energy benefit is presented without sufficient transparency or robust justification. This is not the kind of renewable energy solution that strengthens our future — it simply shifts the burden onto our community. It feels as though the community is being asked to sacrifice our landscape and peace of mind for a project that doesn't even offer reliable energy in return.."</i></p>	<p>Concern raised to seek clarity on the carbon payback period is noted. Table 4-5 General of Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 296 provides a response to this.</p> <p>To reiterate, the assessment of carbon emissions has been undertaken in accordance to the best practice guidance contained within IEMA (2022)³. The methodology and assumptions used to assess the carbon emissions and savings are explained in detail within ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15A] [REP2-030] and ES Volume 4, Appendix A15.1: Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1B], including the supporting technical note on GHG emissions calculations as presented in Appendix 2 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], on page 57.</p> <p>Overall, Planning Statement [EN010162/APP/5.4C] demonstrates that the benefits of the scheme, particularly the delivery of new solar generating capacity, are overwhelmingly greater than the residual adverse effects. There is a clear and compelling case in favour of the DCO being made.</p>
1-2	b) Biodiversity Net Gain	Baseline study for the ES Volume 4, Appendix A8.13: Biodiversity Net Gain (BNG) Assessment [EN010162/APP/6.4.8.13B] is explained

³ Institute of Environmental Management and Assessment (IEMA) (2022). Assessing Greenhouse Gas Emissions and Evaluating their Significance 2nd Edition [Online]. Available at: https://www.iema.net/media/xmgpook/2022_iema_greenhouse_gas_guidance_eia.pdf

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>"The land at Great North Road is not empty space waiting to be filled. It is a living, breathing ecosystem. I've watched wildlife thrive in these fields for years — deer, birds, insects, and countless species that rely on open, connected habitats. The application fails to demonstrate that genuine biodiversity net gain will be achieved. • The baseline ecological assessment appears limited in scope, with seasonal surveys missing and several priority species insufficiently assessed. • The proposed mitigation relies heavily on habitat creation that will take many years to mature, with no guarantee of long-term success. Promises of "future habitat creation" don't comfort those of us who know what will be lost the moment construction begins. It cannot replace what will be destroyed immediately, nor can they guarantee that displaced species will return • Wildlife that depends on open fields, hedgerows, and connected habitats will be pushed out or cut off by fencing, access tracks, and dense rows of panels undermining ecological connectivity. This development will fence off huge areas, cut through wildlife corridors, and replace living land with metal</i></p>	<p>in Section A8.13.2.2 to confirm that all habitats have been appropriately valued, including the valuation of watercourses, ditches in particular. The Applicant has also responded to these points on the adequacy of the baseline study for the BNG assessment within Table 3-2 Responses to NSDC's Comments on Biodiversity (including Net Gain) and Arboriculture of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], at NSDC LIR paragraph reference 9.17 to 9.25, from pages 90 to 91.</p> <p>While newly created habitats naturally require time to mature, they are secured through management plans, and their long-term delivery is mandated by the DCO requirements.</p> <p>Commitments to ongoing monitoring and maintenance are set out in the management plans, which are secured by DCO Requirements in Draft Development Consent Order [EN010162/APP/3.1D]. Failure to comply can be enforced by the local planning authority.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
<p>Janette Maragaret Tate [REP2-138]</p>		
	<p><i>and infrastructure. • The development risks turning a thriving natural landscape into a sterile industrial zone. Once the natural balance is disrupted, it may never return. • The management plan lacks detail on monitoring, enforcement, and accountability. As submitted, the scheme risks delivering biodiversity loss rather than gain. • True biodiversity gain means protecting what already exists — not destroying it and hoping it grows back later. As someone who walks these paths and sees this wildlife daily, the idea of losing it is heartbreaking.”</i></p>	
<p>2</p>	<p>c) Economic, Educational and Sustainability Benefits</p> <p><i>“From where I stand as a resident, the benefits being advertised feel like marketing than reality, are distant and uncertain. The economic and educational benefits are speculative and unsupported The long-term jobs are minimal and largely limited to short term construction roles with no evidence of sustained local employment. • Educational opportunities are vague and seem more like talking points than real commitments. The proposal offers no binding commitments to</i></p>	<p>ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056] provides an assessment of the socio-economic impacts arising from the Development. The Applicant considers that the socio-economic benefits, including commitments to local employment, skills, and training, are supported by a robust assessment. The commitments to deliver economic and educational benefits are outlined within the ES Volume 4, Appendix A13.2: Outline Skills, Supply Chain and Employment Plan [EN010162/APP/6.4.13.2A]. All of these inform the policy testing as stated in the Planning Statement [EN010162/APP/5.4C], which assesses the Development against relevant planning policy and other matters the Applicant considers are likely to be important and relevant</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>local supply chains or training opportunities • The sustainability claims don't match the reality of losing farmland, increasing traffic, industrialising a rural area and the absence of a clear plan for recycling or decommissioning the panels and infrastructure. Educational opportunities are mentioned but never explained, leaving us with nothing more than vague promises. The benefits presented are aspirational rather than demonstrable. The community is being asked to trust benefits that are uncertain, while the harms are immediate and permanent. The economic and educational benefits are speculative and unsupported."</i></p>	<p>to the SoS's decision. As such, the Applicant considers that the planning benefits are justified.</p> <p>Table 4-13 <i>Socio-economics</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], pages 337 to 338, summarises the Applicant's approach to support the community and local businesses, and the number of the local net FTE jobs during construction and operation. The job creation programme will be delivered through a targeted scheme of access to construction training and apprenticeships. by the ES Volume 4, Appendix A13.2: OSSCEP [EN010162/APP/6.4.13.2A], and the detailed OSSCEP is then secured in Requirement 17 of the Draft Development Consent Order [EN010162/APP/3.1D].</p> <p>Please also refer to the Applicant's policy position on this matter in response to LIR paragraph 15.5, provided in Table 3-8 <i>Responses to NSDC Comments on Socio Economics of Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116]</i>, from page 157 to 158. .</p>
2	<p>d) Landscape and Public Access Legacy</p> <p><i>"This is the part that affects me most personally. • The views I see every day — the open fields, rural character that defines this place, the changing seasons, the sense of space — will be replaced by a vast industrial</i></p>	<p>A response to the concerns raised regarding landscape and visual impact, as well as the adequacy of the proposed screening measures, is noted. Similar points were raised previously and were responded to in Table 3-30 <i>Responses to Sutton-on-Trent Parish Council of Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]</i>, at</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>installation. • Views that have shaped the identity of the area for generations would be lost behind metal, fencing, and infrastructure. The tranquillity that drew me to this area will be lost to industrial noise, construction traffic, and a landscape that no longer feels like home. • Proposed screening measures are inadequate, relying on planting that will take many years to establish and may never fully mitigate visual harm. • Public access isn't being improved in any meaningful way. The tranquillity that people currently enjoy and the character of the area will be changed beyond recognition. The so-called "landscape legacy" is not an enhancement — it is a loss of the very qualities that make this area special. This development would take away the very qualities that make living here special by fundamentally changing how the area looks, feels, and is experienced. The landscape legacy is more accurately described as degradation rather than enhancement."</i></p>	<p>page 246. Further detailed responses can be found in Table 4-9 <i>Landscape and Visual</i> of the same Report, on pages 317 to 321.</p> <p>The Applicant's approach to the public rights of way network is summarised in Table 4-12 <i>Public Rights of Way</i>⁴ of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115].</p> <p>Please also refer to the responses on construction effect related to noise and traffic in row 1 of this table.</p> <p>Paragraphs 6.11.1 to 6.11.18 and 6.3.27 to 6.3.54 of the Planning Statement [EN010162/APP/5.4C] suggest that the Development 's approach to landscape and visual matters, and to the public rights of way network, is in compliant with the relevant policy tests.</p>

⁴ Note: New permissive routes are proposed as part of the Development. The total length of all proposed permissive routes has been updated, resulting in a minor reduction from 32.6 km to 32.2 km. All references to the total length of permissive routes across the Application documents were revised at Deadline 2.

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]		
3	<p>e) Community Benefit Fund (NG+)</p> <p><i>“The Community Benefit Fund is being presented as a major positive, but as a resident, it lacks clarity, transparency, enforceability and certainty and feels like a token gesture than a genuine attempt to compensate for the disruption and harm the development would cause. The Community Benefit • There’s no guarantee it will be delivered or maintained. • The scale of the fund appears disproportionately small relative to the long-term impacts on the local area. • The amount offered doesn’t come close to compensating for the long-term impact on our daily lives. • There is no clear explanation of how decisions will be made or how the community can ensure the fund is used fairly. As currently proposed, the fund functions more as a promotional tool than a meaningful community benefit.”</i></p>	<p>The Applicant has provided a response to this at Q1.1.9 of the Responses to ExA’s First Written Questions [EN010162/APP/8.22A], on pages 12 to 13.</p>
3	<p><i>“[...] The harm is immediate and irreversible; the supposed gains are distant and speculative. Solar farms are typically installed with an assumed operational lifespan of around</i></p>	<p>Planning Statement [EN010162/APP/5.4C] addresses the planning balance and the weight that should be given to residual adverse effects arising from the Development. The substantial benefits of the Development, including the urgent need which the recently updated</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]		
	<p><i>40 years. Yet energy technology is advancing at extraordinary speed, and it is widely recognised that far more efficient, less land-intensive solutions are already emerging. By the time these vast installations reach even the halfway point of their projected life, they risk being technologically obsolete—locking our landscape into outdated infrastructure long after better alternatives become mainstream. Renewable energy is important, but not at the cost of the very things that make this area worth calling home. This proposal is simply too large, too intrusive, and too damaging to justify. For the sake of our landscape, our wildlife, our wellbeing, and our community's future, I strongly urge that this development be refused."</i></p>	<p>NPS EN-1 is clear should be given 'substantial weight' substantially outweigh the residual adverse effects. The Applicant considers that the proposal complies with the policies in NPS EN-1 and NPS EN-3.</p>
<p>Q11.1.12 Comments on Cumulative Landscape and Visual Assessment</p>		
<p>4-5</p>	<p><i>"a. Baseline and Treatment of Other Consented or "Reasonably Foreseeable" Projects From a resident's perspective, the applicant's approach to the baseline feels fundamentally misleading. Treating other consented schemes — and even projects that</i></p>	<p>In response to point 'a', the Applicant's responses to ExQ11.1.12(a) in the Responses to ExA's First Written Questions [EN010162/APP/8.22A], pages 122 to 123, provide clarity on this point. The Applicant remains the position that the approach to the cumulative visual assessment is in line with the GLVIA2 and the PINS Guidance.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>are merely “reasonably foreseeable” — as if they already form part of the existing landscape is not an honest reflection of reality. These developments do not currently shape the character of the area. By absorbing unbuilt schemes into the baseline, the applicant effectively hides the true cumulative impact. This approach downplays the scale of industrialisation that communities like ours are being asked to absorb. It creates the impression that the landscape is already degraded, when in fact it remains largely rural and open. Residents experience change incrementally, not as a pre-packaged future scenario. The applicant’s interpretation feels like an attempt to normalise large-scale landscape transformation and minimise scrutiny of the combined effects of multiple solar schemes. This approach is particularly problematic in Nottinghamshire and Lincolnshire, where there is a clear and accelerating proliferation of large-scale solar proposals. Residents are already facing the prospect of multiple overlapping schemes, and the cumulative effect is not theoretical — it is a lived reality. We experience these</i></p>	<p>In response to point ‘b’, please refer to the Applicant’s responses to NSDC LIR 8.31-8.34 of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], on pages 79 – 81. To reiterate:</p> <ul style="list-style-type: none"> • The applicant’s ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] [REP2-022] has assessed the potential impacts across the wider landscape character areas beyond the immediate development boundary, i.e. across the agreed 2km LVIA study area • The assessment of cumulative landscape and visual effects provided within the ES is appropriate and it is not the function of cumulative assessment for an individual project to provide an evaluation of landscape change at the regional level. • It is accepted that the Proposed Development will give rise to adverse effects on visual receptors, with both significant and non-significant effects identified in Table 7.6 and 7.7 of ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022]. • The location of representative viewpoints used to inform ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022], was agreed with NSDC and they were selected to proportionately represent the range of views available, taking into account the activity and sensitivity of visual receptors in

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>developments collectively, not in isolation. For this reason: • Existing and consented schemes should be assessed cumulatively, not absorbed into the baseline. • Proposed or “reasonably foreseeable” projects should be treated as cumulative developments, not as part of the existing landscape. • The assessment must clearly show the combined effect of all solar projects on rural character, visual amenity, and the day-to-day experience of residents. • The baseline must remain grounded in present reality, not a future scenario that conveniently reduces the apparent impact of the applicant’s own scheme.</i></p> <p><i>Failing to treat these developments correctly results in an assessment that underestimates the scale of industrialisation across the region and fails to acknowledge the genuine cumulative burden placed on local communities. If the intention is to understand cumulative effects, then these other projects should be assessed transparently as cumulative additions, not absorbed into the baseline in a way that masks their combined impact. Residents experience these changes sequentially and cumulatively, not as a single,</i></p>	<p>accordance with the GLVA3. This informs the assessment on the effects on the landscape fabric.</p> <p>In response to point ‘c’ on sequential views, the Applicant refers to responses to ExQ11.1.1(2)(c) in Responses to ExA’s First Written Questions [EN010162/APP/8.22A], pages 124–125, together with the Applicant’s responses to NSDC LIR 8.27 – 8.39, in Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], pages 78 to 79. The Sequential assessment has been undertaken both at site level and across the agreed 2 km LVIA study area, incorporating all operational and consented projects.</p> <p>Sequential assessment requires consideration of how the experience of routes through the landscape pass the other developments, that may influence the effects experienced from the proposed development, and the Applicant confirms that this has been appropriately addressed within the ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022].</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>pre-existing condition. Treating future schemes as “given” risks underestimates the true cumulative impact on our area.</i></p> <p><i>b. Failure to Consider Wider Landscape Character Areas If the applicant’s LVIA has not assessed the potential impacts across the wider landscape character areas beyond the immediate development boundary, then the assessment is fundamentally incomplete. The landscape around the Great North Road is not experienced in isolated fragments; it forms part of a much broader rural setting that residents travel through daily. By restricting the assessment to the development boundary, the applicant has ignored:</i></p> <ul style="list-style-type: none"> <i>• The wider rural character that will be eroded</i> <i>• The cumulative industrialisation of the landscape</i> <i>• The experience of neighbouring villages and road users</i> <i>• The visual dominance of large-scale solar infrastructure across multiple character areas</i> <p><i>This narrow approach significantly underestimates the real-world impact.</i></p> <p><i>A proper LVIA must consider the full extent of the landscape that will be affected — not just the area the developer chooses to focus on. To</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>address this properly, the LVIA must be expanded to include: • Assessment of all relevant landscape character areas that the development would influence, not just the area within the red line boundary. • Analysis of how the solar farm contributes to the cumulative industrialisation of the wider rural corridor, particularly given the number of consented and proposed solar schemes in Nottinghamshire and Lincolnshire. • Viewpoints and character assessments from neighbouring villages, public rights of way, bridleways, and rural roads, where the development will be visible and will alter the sense of place. • Consideration of long-distance views and transitions between character areas, which are essential to understanding how the scheme affects the wider landscape fabric. Without this broader assessment, the LVIA significantly underrepresents the true scale of change and fails to reflect how residents actually experience the landscape.</i></p> <p><i>c. Inadequate Consideration of Sequential Views and Movement Across the Landscape Although the applicant and NSDC agree that sequential views have been considered at the</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p><i>site level, the LVIA does not reflect how people move through the wider landscape. Residents do not experience the area from static viewpoints; they encounter it continuously — driving, walking, cycling, and riding along routes where multiple solar developments may appear one after another. GLVIA3 is explicit that sequential views occur when an observer moves between viewpoints, and these can be:</i></p> <ul style="list-style-type: none"> <i>• Frequent sequential views, where developments appear repeatedly along a route</i> <i>• Occasional sequential views, where they reappear at longer intervals due to distance or speed of travel</i> <p><i>The applicant's LVIA does not reflect:</i></p> <ul style="list-style-type: none"> <i>• How multiple solar farms will appear repeatedly along key routes</i> <i>• The cumulative sense of enclosure and industrialisation</i> <i>• The erosion of rural character over long stretches of road and footpath</i> <i>• The real experience of residents who will face these views daily</i> <p><i>This omission is not minor — it undermines the credibility of the entire visual assessment. To correct this, the LVIA should include:</i></p> <ul style="list-style-type: none"> <i>• Route-based sequential assessments along key local roads (including Moorhouse Road, Weston Road, the Great North Road),</i> 	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]		
	<p><i>footpaths, bridleways, and cycle routes. • Evaluation of how multiple solar farms — existing, consented, and proposed — combine to create a repeated or prolonged visual presence across the wider area. • Assessment of the cumulative effect on residents' day-to-day experience, including the erosion of rural character, increased sense of enclosure, and the transformation of the area into an energy corridor. • Consideration of travel speeds and distances, which influence how frequently developments appear in sequence. Without this, the LVIA fails to capture the real cumulative visual burden placed on residents, walkers, cyclists, horse riders and motorists who will encounter these developments repeatedly as they move through the landscape."</i></p>	
Q4.1.10 Comments on Consideration of Mitigation Measures		
6-7	<p>"As someone who lives right on the edge of this proposed development, I find the Stage 1 Screening (AS-020) deeply unsettling. I know this landscape — not from maps or technical reports, but from years of walking it, watching</p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p>the seasons change, seeing the wildlife move through it, and feeling the quiet that makes this place home. That's why it matters so much to me that the assessment is done properly and transparently. What troubles me is the way the screening talks about "project-wide" or "design-related" measures as if they are simply part of the baseline. To me, it's obvious that these are actually mitigation measures — choices made to avoid or reduce impacts on protected sites. And under the Sweetman judgment, those kinds of measures cannot be used to screen out likely significant effects. If the project needs them to avoid harm, then an Appropriate Assessment should be carried out. What worries me is that the screening appears to rely on exactly these kinds of measures to downplay the risks. The report never openly acknowledges this, but the implication is there: the project has been shaped to avoid impacts, and then those shaped-in measures are used to argue that no further assessment is needed. That is not how the process is meant to work. For a development of this scale—one that will reshape our countryside for decades—residents deserve absolute clarity and honesty.</p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate [REP2-138]	<p>We deserve to know whether the project has been screened out because it truly poses no risk, or because mitigation has been quietly folded into the design and treated as if it were part of the baseline I can't shake the feeling that the screening has quietly leaned on these built-in measures to justify a conclusion of "no likely significant effects". But that isn't how the law works, and it certainly isn't how residents deserve to be treated. So I would like to ask directly: Has the Stage 1 Screening (AS-020) relied on any form of mitigation — whether described as embedded, inherent, standard, or design-related — to rule out likely significant effects on European sites? If it has, then the screening is not lawful, and the community is being denied the full, precautionary assessment that should protect the places we care about. I'm not raising this as a technical point for the sake of it. I'm raising it because this is my home. Because I see the wildlife that depends on these habitats. Because I know how fragile this landscape already feels. And because I believe that decisions of this scale should be made with honesty, clarity, and</p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Janette Maragaret Tate	[REP2-138]	
	respect for both the law and the people who live here.”	

3.9 RESPONSES TO JPAG'S DEADLINE 2 SUBMISSION

Table 3-8 Responses to JPAG's Deadline 2 Submission

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG	[REP2-130]	

Q 1.1.9 Planning Benefits

2	<p><i>“JPAG is of the view that the planning statement paragraph 306 (APP-317) (which is paragraph 7.2.4 in revision 2 of the planning statement in REP1-018) sets out an incorrect assessment of the benefits. It is also noted that the wording has been substantially amended by the applicant between the original document on which the Examining Authority question is based and revision 2 of the document. It is also noted that revision 2 of the planning statement (REP1-018) does not include any schedule of changes to allow any interested parties or the</i></p>	<p>Table 1 in the Deadline 1 Cover Letter [EN010162/APP.1.1B] [REP1-001] explains that the Planning Statement [EN010162/APP/5.4C] has been updated at Deadline 1 to reflect the latest policy position, including an updated Sequential Test previously included in the Flood Risk Assessment, and to respond to actions raised during the Issue Specific Hearing 1.</p> <p>Please see the Applicant's responses below to the concerns raised in relation to the Development's benefits.</p>
---	--	--

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>Examining Authority to understand what amendments have been made. The main part of the planning statement has grown from 62 pages in length excluding the glossary, to some 78 pages in length. As such the scale of amendments to the document must be substantial.”</i></p>	
3	<p>Renewable Energy</p> <p><i>“[...] JPAG supports the contention put forward by the Norwell Solar Farm Steering Group that the project based on 2.7 MWh/y AC, this being the figure previously published by Ofgem, would actually only power 272,720 homes and not the 400,000 suggested by the applicant. As we set out in paragraphs 40 to 50 of our relevant representation (RR-101), the figures put forward by the applicant suggest that Great North Road will have the potential to power double the number of homes as One Earth which is the closest NSIP scheme; yet the generation is 800MW versus 740MW. As we identified in our relevant representation, the mean figure of the 11 NSIP schemes is 338 homes per MW, the median figure is 300 homes per MW. At the median figure of 300</i></p>	<p>The Applicant notes the concerns raised on how the number of homes equivalent is derived. Please refer to the Applicant's responses to Action Point 1 of the hearing, as set out in Table 2-1 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068]. The detailed calculation for the homes-equivalent figure is set out in Appendix 1 of the document.</p> <p>To reiterate, the annual electrical energy consumption by one home is taken from OFGEM for a “medium usage” home, as being 2.7 MWh (which is equivalent to 2,700 kWh). This is consistent with the figure published by OFGEM.</p> <p>The homes-equivalent figure for the Development will be different from other solar NSIP schemes due to the differences in project design leading to differences in the amount of electricity generated by the Development annually. The technical note in Appendix 1 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068] explains that the calculation reflects a range of assumption and project</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>homes per MW, GNR would only power 266,667 homes, only two-thirds of the stated number. The applicant uses the average household electricity consumption figure of 2,700 kWh per annum. However, the Department for Energy Security & Net Zero1 indicates that for standard electricity 3,400 kWh per annum is the latest mean consumption level and for homes with Economy 7 electricity 4,800 kWh per annum is the latest mean consumption level. If these latest mean consumption figures are used, then the number of homes capable of being powered reduces to 216,572 and 153,405 respectively. Newark and Sherwood is a district where 25.4% of properties do not have mains gas, in fact most of the host communities around the Order Limits have no mains gas availability at all. As such those properties use more electricity as the DESNZ figures acknowledge. Therefore, the claim that the scheme could theoretically power all homes in Nottinghamshire is fundamentally incorrect. The assumptions on the number of homes that could be powered therefore does not appear to be based on cogent or substantive evidence. The headline</i></p>	<p>design, including the overplanting ratio, grid export capacity, the yield and extent of panel-to-panel shading and the type of solar PV modules. Because these variables vary between projects, the energy yield (MWh/y) for a given maximum capacity (MWp) will vary between projects, so the MWp cannot be used to calculate the number of homes equivalent.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]		
	<i>benefits cited by the project therefore appear to be misleading.”</i>	
4	<p>Carbon Emissions</p> <p><i>“The planning statement, revision 2 in paragraph 7.2.4 still claims that the development is projected to result in a net reduction in emissions of 789,292 teCO₂e₂, helping contribute to the UKs Net Zero targets. However, this figure is strongly disputed by the Norwell Solar Farm Steering Group. JPAG notes and supports the position of the Norwell Solar Farm Steering Group in their written representations (REP1-101 as updated by REP1-102) that in fact the development will not result in any net reduction in emissions. JPAG notes that the Norwell Solar Farm Steering Group concludes in paragraph 14.3 of Rep1-101 that: “The project will produce energy from a renewable source and will contribute to national solar generation capacity. However, given the huge CO₂ emissions and embodied carbon associated with the project, it could not be classed as green or clean power. If allowed, it will contribute to global warming.” There are clearly significant errors in the calculations</i></p>	<p>The Applicant's responses to Action Point 7 of the ISH1 has outlined how the carbon savings is derived, as set out in Table 2-1 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], at page 45. The Applicant then provides a calculation of the greenhouse gas (GHG) emissions in Appendix 2 of the document, on page 57.</p> <p>The points raised by JPAG in this submission, including which assumptions should be used for the grid, the battery, and embodied carbon, are the matters that the Applicant has been discussing with NSFSG. As stated in Section 2.4 of the Draft Statement of Common Ground with Norwell Solar Farm Steering Group [EN010162/APP/8.12B], extensive discussions have taken place between the Applicant and NSFSG regarding the assumptions informing the carbon and generation assessments. A number of points have been agreed as a result of the discussions. It remains the Applicant's position that ES Volume 4, Appendix A15.1: Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1B] applies conservative assumptions regarding materials, design, assembly, earthworks and component use. This approach provides a robust and realistic assessment of the likely GHG emissions associated with the Development.</p> <p>While some uncertainty regarding precise carbon savings or the exact number of homes supported is inevitable at project stage, such</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>undertaken in APP-285 Environmental Statement Volume 4 – Technical Appendices Technical Appendix A15.1 – Lifecycle Greenhouse Gas Evaluation - Rev 1. These have not yet been updated and the proposed Statement of Common Ground with the Norwell Solar Farm Steering Group is a long way from being finalised. It is considered that the suggested benefits from a net reduction in emissions has not been substantiated by the applicant and is vastly overstated. Indeed, the detailed technical work undertaken by the Norwell Solar Farm Steering Group sets out a robust prima facie case that in fact the development will not result in any sent reduction in emissions, but will instead result in an increase in emissions which would undermine the basic principle of the project. JPAG also notes and supports the position of the Norwell Solar Farm Steering Group in their written representation (REP1-099) that in fact the development would still result in an increase in emissions even if the BESS was removed from the project.”</i></p>	<p>uncertainties have no bearing on the acceptability of the Development. To suggest otherwise would be inconsistent with the policy framework and the role of solar within the Government’s net zero strategy.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]		
5	<p>Electricity Prices</p> <p><i>" There is no cogent or substantive evidence to underpin the suggestion that granting consent for the development will directly lead to a reduction in the market price of electricity. The DCO contains no provisions to reduce bills of any people. The price of electricity is subject to market factors, which includes international complexities, taxation factors and is subject to regulation by OFGEM. As such it is naïve and incorrect to say that the development will directly or indirectly lead to a reduction in the overall cost of electricity to consumers. In the week commencing 5 January 2026, data3 shows that solar amounted only for 1.7% of electricity generation. This week was in the winter period when snow was around in parts of the country for either 1 or 2 days in the week. It also included frosts which rendered solar PV panels relatively useless. As a result, Gas had to produce 43.8% of electricity and increasing solar PV provision will have no impact on the ability to produce electricity when the seasonal weather conditions are unfavourable. It is also at the times of these</i></p>	<p>The Applicant has not claimed that the Development would directly reduce electricity bills for individual consumers, and electricity pricing sits outside the scope of the DCO. The role of solar development must be understood at a system level and over an annual cycle, not through isolated winter-week examples. Solar generation remains essential to reducing long-term reliance on fossil fuels and increasing energy security, and the Proposed Development contributes to that strategic national objective.</p> <p>Table 4-11 <i>Principle of Development of Responses to Relevant Representations</i> [EN010162/APP/8.16A] [REP2-115], on page 329, then provides the Applicant's responses to the need for development.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>seasonal weather conditions when electricity demand peaks. This results in a peak in the price of electricity, which on Tuesday 6 January 2026 reached a high of £147.03 per MWh. Adding additional solar PV would have no impact on this peak seasonal demand arising from poor weather nor the peak price spike that occurs. As an example, in the same week we can look at production at Cleve Hill Solar Park on the Graveney marshes between Faversham and Whitstable, Kent in the UK which started operations in July 2025, and is the largest solar farm in the UK, generating 373MW of electricity from 360 ha of solar panels. In that week, its maximum physical output was 81MW on a single day, just 21.7% of its overall theoretical capacity. By contrast Staythorpe C Power Station which is a 1,735 MWe gas-fired power station, produced an output of 1,763MW on the same day; thereby being over 100% of its output capacity.”</i></p>	
5-6	<p>Battery Storage</p> <p><i>“JPAG notes and supports the position of the Norwell Solar Farm Steering Group in their written representation (REP1-100) that there is</i></p>	<p>The Applicant's responses to the concern about the need for BESS noting the presence of the consented Staythorpe BESS is provided at Action Point 4 of the Written Summary of Oral Submissions from</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>no need for the battery storage BESS element of the project. That representation provides useful information on national and local necessity. The applicant claims that the provision of battery energy storage, co-located with the solar generation is a benefit. However, this fails to acknowledge that the applicant already owns a BESS under construction by Mitie Power & Grid at Staythorpe which they propose to use as part of the grid connection in any event. That BESS scheme due to become operational in 2027 will have a capacity of 720 MWh, which the applicant has signed an agreement with EDF, under which EDF's Wholesale Market Services team will guarantee a minimum level of income from grid balancing, alongside the project's 15-year capacity market contract. RES has been awarded a five-year operations and maintenance contract for this BESS. There are also two other permitted BESS schemes (SSE Staythorpe 340 MWh and Kelham Solar 600 MWh) that will connect to the grid at Staythorpe. The need for a fourth BESS scheme in a 2.5km radius has not been demonstrated. The three existing permitted</i></p>	<p>Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], on pages 43 to 44.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>BESS schemes will provide more than sufficient capacity to store all the power generated by the development if permitted. According to the analysts, Cornwall Insight the connections queue for BESS out to 2030 is 61GW, more than double the respective target capacity range, while the queue out to 2035 is 129GW, more than quadruple what is sought by then by the National Electricity System Operator (NESO). As such there is no clear evidence of need for the proposed BESS scheme. Overprovision of BESS capacity beyond that required by NESO cannot be considered to be a benefit. The BESS scheme will result in embodied carbon and emissions from manufacturing, transport, installation, and decommissioning. It will also result in additional land take resulting in impacts including reducing food production, increasing HGV traffic, and elevating risks of ecological harm and public safety incidents. Based on statements made by the applicant at the ISH1, the BESS scheme is viewed as part of the income stream for the development rather than being operationally necessary for the development. As total BESS capacity</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>connecting to the grid at Staythorpe will far exceed the generation from the development, then the proposed BESS will be unduly reliant on overnight charging patterns. Such overnight charging will be likely to increase dependence on gas-fired generation, offsetting any suggested green advantages."</i></p>	
6-7	<p>Landscaping</p> <p><i>"As we identified in ISH1 a significant proportion of the hedgerows and tree planting that are proposed have been identified as being needed to deal with landscape and visual impacts. Therefore, they're not strictly enhancement. They are to make the development acceptable in the first place. Accordingly, they should not be double counted as being a benefit by virtue of being an enhancement when they're actually required for a different purpose. The planning statement does not identify and quantify what tree and hedgerow planting is actually being provided as a benefit. The planning statement suggests that significant landscape enhancements comprising diverse grassland will occur. It suggests that this includes all the areas</i></p>	<p>The Applicant's responses to the concern about the double counting of mitigation and enhancement is provided at Action Point 13 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], on pages 47 to 48.</p> <p>In relation to the quantity of the tree planting, Section 5.3 of the Planning Statement [EN010162/APP/5.4C] sets out the extent of the proposed tree planting, hedgerow, grassland, and the secured biodiversity net gains for habitats. The details of enhancement provided in the Planning Statement [EN010162/APP/5.4C] is sufficient to make a planning judgement. The types of tree and hedgerow planting are referenced in ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1C], and further details will be provided within the detailed LEMP, as secured by Requirement 8 in Schedule 2 to the Draft DCO [EN010162/APP/3.1D].</p> <p>Grazing does not conflicts with grassland creation. As stated in Table 4-8 <i>Land Use</i> of the Responses to Relevant Representations</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>occupied by the PV panels. However, this grassland is proposed to be grazed, so it is unclear as to how a management regime will ensure that this grassland becomes diverse grassland. In any event this would only apply during the operational phase of the development and would therefore be a temporary land use, not a permanent land use. The Natural England document Evidence review of the impact of solar farms on birds, bats and general ecology 2016 (NEER012) concluded: "The lack of evidence available relating to the ecological impact of solar farms is concerning. It has led to authoritative organisations making speculative arguments and publishing information that on occasion appears to conflict. For conservation organisations to provide sound advice that is coherent and consistent, evidence is needed. The move towards renewable energy sources by many governments is progressive and admirable, however more needs to be done to understand the interaction between these new technologies and the ecology that they are ultimately designed to protect." Natural England as the Government conservation body</i></p>	<p>[EN010162/APP/8.16A] [REP2-115], on page 314, the Applicant has explained that sheep grazing forms part of the grassland maintenance strategy within solar PV areas and will assist in improving biodiversity and soil activity. The latest position with Nottinghamshire Wildlife Trust regarding the sheep grazing regime is set out in Draft Statement of Common Ground with Nottinghamshire Wildlife Trust [EN010162/APP/8.11B].</p> <p>Further responses on securing the landscaping and biodiversity enhancement can be found in Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], within Table 4-2 <i>Ecology and Biodiversity</i>, on pages 276 to 278, and within Table 4-9 <i>Landscape and Visual</i>, on page 317.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>has not produced any subsequent evidence report based on research. Given the above stated position, a precautionary position needs to be adopted. The applicant has not provided any examples of operational solar PV projects which are being managed in the same way as proposed. Given that there are operational solar PV schemes in the local area which involve grazed grassland, including at Egmonton, it is reasonable to expect that the applicant could provide documentary evidence to show how the grazed grassland at Egmonton has resulted in the benefits they suggest. The applicant took members of the public to see the existing Egmonton solar site during the consultation process. As such, although Egmonton Solar Park Ltd is understood not to be a company connected with the applicant, it is plainly a site with which the applicant has had an opportunity to access and assess as being a suitable example of what the development proposes."</i></p>	
7	<p>Permissive Paths</p> <p><i>"It is accepted that the draft Development Consent Oder in paragraph 18 of Schedule 1</i></p>	<p>The Applicant considers that the permissive route to be permanent by that period of 40 years, and such wording is consistent with other NSIP projects. The Applicant's response to this concern raised regarding the</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>does require the respective permissive route to be provided and open to the public prior to the date of final commissioning in respect of each phase of the development. However, these routes are not to be dedicated as public rights of way and the draft DCO does not require these routes to remain post decommissioning. As such they are temporary routes and not permanent enhancements to the formal public rights of way network."</i></p>	<p>temporary nature of the PRow in the dDCO is provided within the response to ExQ2.1.6 of Responses to ExA's First Written Questions [EN010162/APP/8.22A], page 22 to page 23.</p>
8	<p>Biodiversity Net Gain</p> <p><i>"It is accepted that the draft Development Consent Order in paragraph 8 of Schedule 2 does require the respective BNG mitigation during the operational phase. However, the draft DCO does not require these BNG elements to remain post decommissioning. As such they are temporary measures and not permanent enhancements."</i></p>	<p>Such approach is consistent with established planning practice. Achieving a BNG is currently not an obligation on DCO applicants and there is no policy requirement to remain BNG in post-decommissioning. It is considered beneficial to secure BNG during the operational phase within the Draft DCO [EN010162/APP/3.1D], and that there is a commitment in the ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1C] to deliver all habitat enhancement measures.</p>
8-10	<p>Employment, Training and Education</p> <p><i>"It is accepted that the draft Development Consent Order in paragraph 17 of Schedule 1 does require the submission of a skills, supply chain and employment plan to be submitted</i></p>	<p>The assessment on the impact of employment generation and the change of use on agricultural output is provided in ES Volume 2, Chapter 13: Socio-economics and Tourism [EN010162/APP/6.2.13] [APP-056]. The ES chapter also states the net FTE job creation as a result of the Development. The Planning Statement</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>post decision to the LPA for approval. However, there is no requirement in the draft DCO for this employment to be drawn from the local area. The draft DCO does not give any minimum employment numbers, so there is no guaranteed employment. The planning statement does not set out net employment figures; it makes no allowance for employment lost from agriculture and employment in the wider economy associated with the agricultural supply chain and maintenance. The applicants in constructing the Staythorpe BESS scheme has chosen to appoint Mitie Power & Grid to construct that scheme. That contractor Mitie Power & Grid combines grid connection services from G2 Energy, Rock Power Connections and ESM Power as well as renewable energy support from Custom Solar. The applicant has not specified their preferred construction contractor but as they already have an existing commercial arrangement with Mitie Power & Grid it is reasonable to assume that they may become the relevant construction contractor. Mitie has offices in London, Bristol, Glasgow and Northampton, it is not based locally. G2 Energy is based in</i></p>	<p>[EN010162/APP/5.4C] then provides a planning assessment of the Development as informed by the ES chapters.</p> <p>The Applicant's responses provided within Table 4-13 Socio-economics of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 337, summarises the Applicant's approach to support the community and local businesses through a targeted scheme of access to construction training and apprenticeships. The job creation programme will be delivered by the ES Volume 4, Appendix A13.2: OSSCEP [EN010162/APP/6.4.13.2A], and the detailed OSSCEP is then secured in Requirement 17 of the Draft Development Consent Order [EN010162/APP/3.1D].</p> <p>In terms of the adequacy of job creation, please refer to the Applicant's policy position on this matter in response to LIR paragraph 15.5, provided in Table 3-8 <i>Responses to NSDC Comments on Socio Economics</i> of Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], from page 157 to 158.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>Buckinghamshire and Rock Power Connections is based in Bromsgrove in Worcestershire. ESM Power and Custom Solar are the closest Mitie subsidiaries being based in Scunthorpe in North Lincolnshire and Chesterfield in Derbyshire respectively. It is also worth noting that the current vacancies advertised in connection with the Staythorpe BESS through G2 Energy, part of Mitie, are clear that the role is not just at Staythorpe but additionally covers the area of Nottingham, Derby, Chesterfield & M1 Corridor. In the context of power generation construction, the number of jobs suggested at 180 direct local full time equivalent ('FTE') construction and manufacturing jobs for a 24-month construction period is minimal. By means of comparison the construction of Sizewell C nuclear power station proposes a peak construction workforce of 7,9004 and the proposed Carbon Capture plant at Staythorpe Power Station envisages thousands of additional jobs during construction⁵. ONS figures⁶ identify that there were 2,054,009 workers in construction in the third quarter of 2025. That reinforces how the scale of construction employment in the</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>development is wholly insignificant in the context of the construction sector. The operational phase of the development says it would support 19 direct local FTE jobs consisting of operational and maintenance roles for the PV panels and other structures, as well as a further 21 jobs in the wider economy. Again, in the context of power generation the number of jobs is minimal. By means of comparison Staythorpe Power Station has approximately 100 long-term operational jobs⁷. The ONS estimates⁸ that UK employment in green jobs was an estimated 690,900 full-time equivalents (FTEs) in 2023. It also estimates that UK low carbon and renewable energy economy (LCREE) employment was estimated⁹ to be 314,300 full-time equivalents (FTEs) in 2023. Again, against these figures the scale of operational employment in the development is wholly insignificant in the context of the low carbon and renewable energy sector. The planning statement also refers to the suggestion of opportunities for skills and training initiatives (apprenticeships; vocational qualifications; STEM education). However, the draft DCO does not contain any</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>provisions to secure any of these elements. The consultation on the development has sought to make great play of the suggested EG Education & EG Academy proposals. All of these were integral and referred to in documents produced throughout the consultation process by the applicant. However, as the applicant has had to acknowledge these alongside the NG+ measures are not part of the DCO proposals. JPAG would reiterate that it would be unlawful to give any weight to any of the matters in the suggested EG Education & EG Academy proposals on the basis of the Supreme Court case of R v Resilient Energy Seven Day Limited and Forest District Council 2017, which is cited in paragraph 25 of our relevant representation, RR-101."</i></p>	
10	<p>NG+</p> <p><i>"It is noted that version 2 of the planning statement (REP1-018) no longer refers to NG+ as a planning benefit. This recognition by the applicant which follows their acknowledgement in their written representation (REP1-068) that NG+ measures are not part of the DCO</i></p>	Noted.

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]		
	<p><i>proposals and can be afforded no weight is welcomed. As JPAG has set out previously with regards to NG+, it would be unlawful to give any weight to any of the matters in the suggested NG+ proposals on the basis of the Supreme Court case of R v Resilient Energy Seven Day Limited and Forest District Council 2017, which is cited in paragraph 25 of our relevant representation, RR-101."</i></p>	
Q 11.1.12 Cumulative Landscape		
10-12	<p><i>"Sequential Views In ISH1 we raised concern that the general approach of identifying the zones of influence is really not sufficient. The encircling effect and the clustering needs to be properly considered as part of this. On the point about the regularity of experience, what is commonly called the sequential views, because where we are, there are very limited, crossings across the River Trent. So, there are some settlements where people will never be able to leave their village, and particularly places like Averham and Kelham, without going through the development. As a Landscape Institute Technical Note10 highlights, GLVIA3</i></p>	<p>With regard to GLVIA3 paragraphs 3.28–3.30, these do not relate to sequential effects and are in reference to how subsidiary judgements may be combined to reach a judgement of 'overall significance' (or level of effect). For the avoidance of doubt, the ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022] uses the sequential approach in this context.</p> <p>As mentioned in the Applicant's responses to ExQ11.1.12 in the Responses to ExA's First Written Questions [EN010162/APP/8.22A], on page 126, the NatureScot guidance clearly indicates that "<i>Sequential impacts occur when the observer has to move to another viewpoint to see different developments. Sequential impacts should be assessed for travel along regularly-used routes like major roads, railway lines, ferry routes, popular paths, etc.</i>" This suggests like detailed sequential assessment is typically only undertaken for long</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>(at paragraphs 3.28-3.30) allows for two approaches to combining judgements to come to a judgement of overall effect. One is the 'sequential combination' methodology whereby susceptibility to change and value can be combined into an assessment of sensitivity for each receptor; size/scale, geographical extent and duration and reversibility can be combined into an assessment of magnitude for each effect; and magnitude and sensitivity can then be combined to assess overall significance. The other approach is the 'overall profile' methodology whereby all the judgements against the individual criteria can be arranged in a table to provide an overall profile of each identified effect, taking an overview of the distribution of the judgements for each criterion to make an informed professional assessment of the overall significance of each effect. Judgements on susceptibility and value feed into both approaches. Specific guidance on assessing sequential effects is limited. Although for a different form of renewable energy, Nature Scot has produced specific guidance¹¹ on sequential views for onshore wind. That guidance states: "Sequential visual</i></p>	<p>distance routes, as these represent frequently used routes for people travelling longer distances.</p> <p>It is acknowledged that in the local context there are short, regularly-used routes as identified by JPAG. As explained in the Applicant's responses to NSDC LIR 8.31-8.34 of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], on pages 79 to 81, these short local routes consists of short local journeys via a network of minor roads and footpaths such that there is no 'typical' journey that can be used as being representative. For such routes, the visual effects are captured through the assessment of effects visual receptor groups. Further responses on this is detailed in paragraph 6.3 of Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], confirming that effects on every part of every Public Right of Way and local road within the study area; and each of the longer distance routes through the study area have been provided within the ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022]. As such, having an additional sequential assessment for the local movements along the identified routes by JPAG would not alter the magnitude or levels of effect reported in the LVIA</p> <p>The GNR assessment team are well aware of the methods for assessing cumulative sequential effects for wind farms, having undertaken assessment for many wind farms over more than 23 years and having originated some of the techniques described in the guidance. Wind farms differ materially from solar development by way of</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>assessment and selection of routes for analysis Routes to be assessed should be defined and agreed with the Planning Authority as part of the baseline LVIA. The extent of these study routes should be informed by the 60km search area base plan drawing and the cumulative ZTVs. They may extend beyond this in some situations, for example particularly important or busy travel routes, or particularly sensitive locations. A "journey scenario" should be considered for routes that may have significant cumulative impacts, and the description of available views and how these may be affected by the proposal may note:</i></p> <ul style="list-style-type: none"> • direction of view ('direct', 'oblique', 'aligned on route', or 'looking NW of route' etc.); • distance from nearest turbine; and • distance over which the effect would occur. It can also be helpful for the assessment to identify the likely duration of the predicted effect. For example, 'assuming an average speed of travel 'x', this effect will be apparent for approximately ten minutes between 8 and 12 km from the nearest turbine'. <p><i>The journey scenario can be illustrated in various ways as described in 'illustrative methDDS' below."</i> That guidance goes on to</p>	<p>their far greater height, which leads to very large LVIA study areas where detailed modelling can greatly help to focus and inform assessment. However, this additional modelling and analysis is not considered to be required for the Development (and other solar farms) in this study area given the visibility from all routes in the study area can be understood from the ZTV study and site work, described and illustrated (via ES Volume 3, Figure 7.6: Visual Receptors Before Mitigation [EN010162/APP/6.3.7A] [AS-035] and ES Volume 3, Figure 7.7: Visual Receptors After Mitigation [EN010162/APP/6.3.7A] [AS-035]) without additional modelling techniques.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>state: “Sequential impacts can also be illustrated in several ways: • plan showing visibility of different projects from a route denoted by coloured arrows on mapped base; • diagram showing visibility of different projects from a route. This could take the form of a colour-coded timeline linked to the colours used in the ZTV; • table showing predicted visibility by length of route affected by each project, including commentary text on every 10km explaining where each project is visible and the nature of this visibility; • colour coded sequential bar chart or “timeline” showing distance, duration of view and whether it is direct, oblique, screened, etc., with the colours for each wind farm matching those used in the ZTV. An analysis of the significance of such quantitative data is needed. Computer generated moving images (“drive throughs”) or videomontage techniques may also be appropriate to assist CVIA, particularly in respect of cumulative sequential impacts. This technique may be particularly applicable to assessment from moving receptors such as trains or ferries or in assessing wind farm extension applications where different turbines</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<i>with different heights and rotor speeds are being used.”</i>	
13-14	<p><i>In relation to the development, there are numerous locations where both frequent sequential and occasional sequential views will be seen.</i></p> <p><i>In our written representation (Rep1-093), JPAG has provided plans showing other permitted and proposed schemes overlaid on the base mapping of the development. This was done to aid the understanding of cumulative impact.</i></p> <p><i>These composite plans that we have produced also assist in helping to understand where sequential views of the development and other permitted projects are likely to arise.</i></p> <p><i>JPAG considers that sequential views need considering along the following roads as a minimum:</i></p> <ul style="list-style-type: none"> <i>• Staythorpe Road/Averham Relief Road – from Rolleston to Averham</i> <i>• A617 – from Kelham to Hockerton</i> 	<p>Sequential views of the Development (and cumulative developments where relevant) for all of the routes listed by JPAG have been considered in the LVIA as set out in the response above.</p> <p>The plans provided within JPAG’s written representation is noted, and responses have been provided within Table 4-8 <i>Responses to JPAG of Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116]</i>, on page 226.</p> <p>ES Volume 4, Appendix 7.5: Non-Significant Effects [EN010162/APP/6.4.7.5A] has been updated to provide more description of sequential views from the main routes through the study area, including the A1, East Coast Main Line, A616 and A617. The description provided previously was proportionately brief, given that effects on the longer distance routes were identified as being towards the lower end of non-significant effects and the views of cumulative development have a very limited bearing on the assessment outcomes.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<ul style="list-style-type: none"> • <i>Broadgate Lane – from Kelham to Averham Park</i> • <i>Cold Harbour Lane – from Averham Park to A616</i> • <i>Caunton Road – from Hockerton, through Knapthorpe to Caunton</i> • <i>Maplebeck Road and Newark Road – from Caunton, through Maplebeck to Eakring</i> • <i>Winkburn Road – from Winkburn to Maplebeck</i> • <i>Maplebeck Road and Kersall to Laxton Road – from Maplebeck through Kersall to A616</i> • <i>A616 – from South Muskham to Kneesall</i> • <i>Kneesall Road (a.k.a as Kersall Road) – from A616 to Kneesall Wood</i> • <i>Norwell Woodhouse Road – from Norwell Woodhouse to Kneesall Wood</i> • <i>Ossington Road/Kneesall Road/Main Street/Carlton Road – from Kneesall through Ossington to Carlton on Trent</i> • <i>Moorhouse Road – from Ossington through Moorhouse to Egmanton</i> 	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<ul style="list-style-type: none"> • <i>Sutton Road/Ossington Road – from Sutton on Trent to Ossington</i> • <i>Carlton Lane/Norwell Lane – from Carlton on Trent to Norwell</i> • <i>A1 – from Egmonton to North Muskham</i> <p><i>JPAG also considers that sequential views need considering along the following railway line as a minimum:</i></p> <ul style="list-style-type: none"> • <i>East Coast Mainline – from Newark to Tuxford</i> <p><i>In addition, JPAG considers that sequential views need considering along the various public rights of way within the order limits and the other approved schemes. This is a list which is too extensive to list. The development in itself and combination with other permitted schemes would in particular have a concentrated impact on the following broad areas:</i></p> <ul style="list-style-type: none"> • <i>Staythorpe, Averham, Kelham and Averham Park</i> • <i>Averham Park and Knapthorpe</i> 	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]		
<ul style="list-style-type: none"> • <i>Maplebeck and Kersall</i> • <i>Carlton on Trent and Sutton on Trent</i> • <i>Ossington and Moorhouse</i> 		
Q 11.1.13 Cumulative landscape and visual effects: Kelham Solar Farm		
14	<p><i>“JPAG considers that the impact of Kelham Solar Farm adds to the concentration of development and the cumulative impact of Kelham in conjunction with the development includes the spatial extent of the various consented and proposed renewable energy proposals. As with the issue of openness assessment in a Green Belt context there is two interrelated dimensions namely a spatial dimension and a visual dimension. Although we are not in the Green Belt, considering the principle of both a spatial dimension and a visual dimension to assessing cumulative impact appears to be appropriate. The development proposes to have the BESS and 400kV substation on the rising land. The land rises from the valley height of 13m AOD to a height around 22m AOD. This will mean that in viewpoint 45 the proposed BESS and 400kV</i></p>	<p>Please refer to the Applicant's responses to ExQ11.1.1 3 within Table 2-11 Landscape and visual impacts of the Responses to ExA's First Written Questions [EN010162/APP/8.22A], pages 126 to 127.</p> <p>The consideration of impacts on spatial and visual openness is a specific requirement of the Green Belt test. However, the ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022] assesses the effects of the development on the landscape fabric and on visual receptors</p> <p>In response to the JPAG comment that, <i>“Put simply, the argument that the applicant is seeking to pursue would be if it were a power station arguing that because 4 cooling towers already exist, a further 4 cooling towers doesn't really have any impact at all.”</i>. This is not the position advanced by the Applicant. As reported in Section 1.4 of the Written Summary of Oral Submissions from Issue Specific Hearing 3 and Response to Action Points [EN010162/APP/8.26], the purpose of a cumulative landscape and visual effects assessment is to identify the likely significant effects arising from the Proposed Development itself, taking account of other developments in the baseline. It does not assert that the combination of all solar farms in the area has no impact overall;</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>substation will be fully visible above the Kelham Solar Farm PV panels. This will draw the eye to the distance, and the rising topography will emphasise the 1.7km combined depth of both schemes from viewpoint 45. The development in combination with the existing permitted projects in the Staythorpe, Averham, Kelham and Averham Park area will result in an area measuring 3.5km north to south and 1.8km east to west being covered by the various renewable energy proposals. This will increase the concentration in this area that needs to be fully considered, alongside the other areas where the development in itself and in combination with other schemes is already having a cumulative and concentrated impact. Put simply, the argument that the applicant is seeking to pursue would be if it were a power station arguing that because 4 cooling towers already exist, a further 4 cooling towers doesn't really have any impact at all. Whereas in fact there is an additional impact in both spatial and visual terms. The now approved Kelham Solar Farm in combination with the development will have</i></p>	<p>rather, the ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022] informs the decision-maker of the landscape and visual effects of the Development. Further explanation of the principles and purpose of cumulative assessment is provided in Section 2 of Appendix 3 of the Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068].</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]		
<i>a cumulative impact in both spatial and visual terms</i>		
Q 13.1.6 Sustainable drainage system design		
15-16	<p><i>“JPAG is concerned that there is no specific sustainable drainage system strategy included for works 2 (Cables - underground cables only) and for works 8 (Access improvements). It is accepted that works 3 (Mitigation/Enhancement) involve soft landscaping and ecological enhancement so will have limited impact on surface water flows. It is also noted that works 6 (Modifications at the existing National Grid substation) and works 7 (Modifications at the Staythorpe BESS) are already assessed in the Flood Risk Assessment because these areas fall within the fluvial flood zones. JPAG notes that the cable works will disturb land but may actually offer the potential for enhanced sustainable drainage through large scale percolation which could be a benefit in some areas if incorporated. In the area covered by the order limits the issue of pluvial flooding from surface water run-off is a significant issue. In terms of</i></p>	<p>In the Applicant's responses to ExQ13.1.6 in Responses to ExA's First Written Questions [EN010162/APP/8.22A], on page 135, the Applicant has addressed the SuDS approach to Work Areas 6 and 7. For Work Areas 3 (Mitigation/Enhancement), will serve to improve the downstream effects of run off. As such, the risk of flooding to Work Area 3 is Negligible.</p> <p>For Work Areas 2 (Cables) and 8 (Access Works), as set out in Section A9.1.2.3 of the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C], the cable works will be located below ground level and access works will utilise existing roads or be constructed flush with existing ground levels. As such, these works will not influence flood conveyance or result in the displacement of floodwater.</p> <p>While these works do not influence conveyance, surface water runoff from access tracks and hardstanding has been anticipated and is subject to mitigation secured through the ES Volume 4, Appendix A5.3: Outline CEMP [EN010162/APP/6.4.5.3C]. Section A5.3.9.1.5 of the oCEMP sets out that there will be settlement lagoons for temporary storage volume for storm runoff from the foundations and hardstanding areas. As outlined in Written Summary of Oral Submissions from</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]	<p><i>access improvements, we are aware from local knowledge and the surface water flood maps of numerous examples where surface water run-off from fields along existing field gates and along roads is a principal source of surface water flooding. JPAG notes for example the representation of Pamela Gladwin (RR-169) includes photos showing surface water run-off from a field gate to be used as an access for the development (SA13 & SA14). The photos show the surface water run-off flowing from the field gate along the public highway and into the property known as Mainwood Farm. Locations where access points involve high or medium risk of pluvial flooding appear to potentially include PA1, PA6, PA9, PA19, SA1, SA2, SA3, SA9, SA12, SA13, SA14, SA15, SA16, SA19, SA23 and SA24. Given that this is a significant number of the potential access locations, not fully considering this as part of a sustainable drainage system strategy appears to be a significant omission. Existing access points onto the public highway are proposed to be used, some upgrades and new access points are required. The access works will include the creation of new access points from public</i></p>	<p>Issue Specific Hearing 3 and Response to Action Points [EN010162/APP/8.26], there will be trackside drainage and attenuation features, such as check dams to slow the flow of surface water, including from Work Area 8. Appropriate licensing and discharge consents will be sought before the construction phase of the Development.</p> <p>Detailed drainage measures for the accesses and cable works is yet to be finalised, and the final design will adhere to the approved oCEMP to ensure no increase in off-site flood risk as secured in Requirement 12 of the in Schedule 2 to the Draft DCO [EN010162/APP/3.1D].</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP2-130]		
	<p><i>highways and other road works, including temporary changes to street furniture, road widening, installation of passing places, and vegetation cutting to ensure there is sufficient visibility at the access points for the safe flow of traffic. It seems to JPAG that all of these works really do need to include sustainable drainage measures.”</i></p>	

3.10 RESPONSES TO NORTH MUSKHAM PARISH COUNCIL'S DEADLINE 2 SUBMISSION

Table 3-9 Responses to North Muskhams Parish Council's Deadline 2 Submission

Page Ref.	Summary Position of Interested Party	Applicant's Responses
North Muskhams Parish Council [REP2-121]		
<i>Q1.1.9 Planning Benefits</i>		
1	<p><i>“Renewable Energy The Parish Council challenges the claimed benefits relating to the project's contribution to renewable energy generation and net zero objectives. In our view, these benefits have been significantly overstated by the applicant. We fully endorse</i></p>	<p>As stated in Section 2.4 of the Draft Statement of Common Ground with Norwell Solar Farm Steering Group [EN010162/APP/8.12B], extensive discussions have taken place between the Applicant and NSFSG regarding the assumptions informing the carbon and generation assessments. A number of points have been agreed as a result of the discussions. It remains the Applicant's position that ES Volume 4,</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
North Muskham Parish Council [REP2-121]		
	<p><i>and support the detailed and well-considered submissions made by the Norwell Solar Farm Steering Group, which clearly set out these concerns. In particular, we ask the Inspector to give careful consideration to the following Deadline 1 submissions: • REP1-098 • REP1-099 • REP1-100 • REP1-101 • REP1-102 Biodiversity Net Gain The Parish Council considers that the applicant has also significantly overstated the proposed biodiversity net gain. Insufficient weight has been given to the requirement to maintain, monitor, and conserve the land throughout the full 40-year operational period. Beyond initial habitat creation and land allocation, a robust long-term stewardship strategy is required. This should include appropriate staffing and active management to monitor habitats and remedy issues as they arise. The Parish Council has previously raised with the applicant the need for a dedicated reporting mechanism (such as a local “hotline”) to allow residents to report issues during the lifetime of the development. While this proposal was received positively, it has not been incorporated into the draft Development Consent Order (DCO).”</i></p>	<p>Appendix A15.1: Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1B] applies conservative assumptions regarding materials, design, assembly, earthworks and component use. This approach provides a robust and realistic assessment of the likely GHG emissions associated with the Development. While some uncertainty regarding precise carbon savings or the exact number of homes supported is inevitable at project stage, such uncertainties have no bearing on the acceptability of the Development. To suggest otherwise would be inconsistent with the policy framework and the role of solar within the Government’s net zero strategy.</p> <p>The Applicant’s responses on who the point of contact is in case of complaints or concerns is set out within Table 3-19 <i>Responses to North Muskham Parish Council</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], at page 129. Such measure is incorporated in the Outline CEMP, and the final CEMP will be available for review by Newark and Sherwood District Council through Requirement 12 in Schedule 2 of the Draft Development Consent Order [EN010162/APP/3.1D].</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
North Muskham Parish Council [REP2-121]		
Q13.1.6 Sustainable Drainage		
1	<p><i>“The application does not appear to include a comprehensive sustainable drainage strategy covering all stages of the works. In particular, no clear provision is evident for: • Work No. 2 – Underground cables • Work No. 3 – Mitigation and enhancement • Work No. 6 – Modifications at the existing National Grid substation • Work No. 7 – Modifications at Staythorpe BESS • Work No. 8 – Access improvements This omission should be addressed.”</i></p>	<p>Please refer to the Applicant's responses to JPAG within Table 3-8 <i>Responses to JPAG's Deadline 2 Submission</i> of this Report, as well as the Applicant's responses to ExQ13.1.6 in Responses to ExA's First Written Questions [EN010162/APP/8.22A], on page 135.</p>

3.11 RESPONSES TO NORWELL PARISH COUNCIL’S DEADLINE 2 SUBMISSION

Table 3-10 Responses to Norwell Parish Council’s Deadline 2 Submission

Page Ref.	Summary Position of Interested Party	Applicant’s Responses
Norwell Parish Council [REP2-122]		
<i>General</i>		
1	<p><i>“The Norwell and Norwell Woodhouse Parish Council notes the comments made by JPAG in response to questions regarding the cumulative landscape and visual assessment by the applicant and supports their concerns regarding the landscape and visual impacts of the proliferation of large scale solar across Nottinghamshire and Lincolnshire, particularly associated with the River Trent corridor. In particular the Council is concerned regarding the effect on the Parish of being located within the ‘ring’ of solar farms that make up the GNR Solar Park proposal. Whilst the Council accepts that the visual impact of immediate line of sight from homes is limited in scope, affecting mainly those residents within Norwell Woodhouse, there are major concerns regarding the cumulative impact on residents every time they leave or enter this heritage village.”</i></p>	<p>Please refer to Applicant’s responses to JPAG’s Deadline 2 Submission above, within Table 3-8 of the Report.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
-----------	--------------------------------------	-----------------------

Norwell Parish Council [[REP2-122](#)]

Sequential Views

<p>1-2</p>	<p>“We agree with JPAG that the general approach of identifying the zones of influence is really not sufficient and that the encircling effect and the clustering of areas of solar panels needs to be properly considered as part of this assessment.</p> <p>There are, as has been stated by JPAG, very limited crossings across the River Trent in this area and this is further impacted by the effect of the East Coast Main Line railway crossings. The means that residents will, with only one small exception, have to go through the development with line of site to the panels each and every time they make a journey in or out of the village.</p> <p>We note the reference made by JPAG regarding the possible approaches to combining judgements to come to an understanding of the overall effect and it is not our intention to repeat these here. However we feel that providing the details of the journey</p>	<p>The routes identified by JPAG and Norwell Parish Council are noted, and it is acknowledged that they represent a range of local movements undertaken by residents of Norwell for day-to-day activities. The visual effects on these identified routes are captured within the LVIA as follows:</p> <p>The detailed assessment of changes to views from local roads arising from the Development is illustrated by ES Volume 3, Figure 7.6: Visual Receptors Before Mitigation [EN010162/APP/6.3.7A] [AS-035] and ES Volume 3, Figure 7.7: Visual Receptors After Mitigation [EN010162/APP/6.3.7A] [AS-035]. Figures 2, 4 and 6 in Appendix C to Responses to ExA’s First Written Questions [EN010162/APP/8.22A] illustrate the level of effects for the receptor groups those routes are included within. The routes listed by Norwell Parish Council are considered within the LVIA as follows:</p> <table border="1" data-bbox="1032 1058 2045 1361"> <thead> <tr> <th data-bbox="1032 1058 1294 1166">Route</th> <th data-bbox="1294 1058 1507 1166">Receptor Groups</th> <th data-bbox="1507 1058 2045 1166">Effects</th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 1166 1294 1361">1. East to A1; 4 / 5. South to Bathley and/or Caunton</td> <td data-bbox="1294 1166 1507 1361">H</td> <td data-bbox="1507 1166 2045 1361">Minimal, Neutral at all stages of the Development.</td> </tr> </tbody> </table>	Route	Receptor Groups	Effects	1. East to A1; 4 / 5. South to Bathley and/or Caunton	H	Minimal, Neutral at all stages of the Development.
Route	Receptor Groups	Effects						
1. East to A1; 4 / 5. South to Bathley and/or Caunton	H	Minimal, Neutral at all stages of the Development.						

Page Ref.	Summary Position of Interested Party	Applicant's Responses		
Norwell Parish Council [REP2-122]				
	<p>scenario as it affects Norwell residents may provide a useful illustration of this point.</p> <p>1. Main Street Norwell, East onto Norwell Lane to Cromwell and link to:</p> <p style="padding-left: 40px;">1.1. North onto A1</p> <p style="padding-left: 40px;">1.2. North onto Main Street over A1 onto Great North Road to Carlton on Trent</p> <p>2. Main Street North taking right hand lane passing Willoughby Farm to join Ossington Road (B11640 link to:</p> <p style="padding-left: 40px;">2.1. East on Ossington Road and North onto A1</p> <p style="padding-left: 40px;">2.2. East on Ossington Road to Great North Road and North to Sutton on Trent</p> <p style="padding-left: 40px;">2.3. East on Ossington Road to Great North Road and South to A1 South</p> <p style="padding-left: 40px;">2.4. East on Ossington Road to Great North Road and South on Main Street to Cromwell</p>	<p>2. Northeast towards Carlton-on-Trent and Sutton on Trent / A1</p>	<p>F (closer to Norwell), G (beyond the A1)</p>	<p>Before planting matures - Minor and Adverse within 1km of Norwell, Major/moderate and Adverse (significant) from 1km north of Norwell to Carlton on Trent.</p> <p>Once planting matures, Moderate and Adverse from 1km north of Norwell to Carlton on Trent, Minimal and Neutral elsewhere.</p> <p>Minimal and Neutral after decommissioning.</p>
		<p>3. North to Ossington Road and then either east or west</p>	<p>F</p>	<p>Major/moderate and Adverse (significant) during construction and early operation.</p> <p>Once planting matures, Moderate and Adverse.</p> <p>Minimal and Neutral after decommissioning.</p>
		<p>6. West to Ollerton</p>	<p>H (within 3.5km of Norwell), G (to</p>	<p>Major/moderate and Adverse (significant) between the western edge of Norwell Woodhouse and Kneesall during construction and</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses	
Norwell Parish Council [REP2-122]			
	<p>3. Main Street North talking left hand lane passing Germany F & Son Farm to Ossington Road</p> <p>3.1. Turning right (see 2.1 to 2.4 above)</p> <p>3.2. Turning right then first left lane to Sutton on Trent – key route as only way heading east that has a bridge over the East Coast main railway line – used where time critical appointments are made as the delays at the crossings on other routes can be considerable, in excess of 15 minutes on occasions.</p> <p>3.3. Left to Ossington – route to only supermarket not in Newark itself within a reasonable distance.</p> <p>4. Main Street West and South via Bathley Lane to Caunton and onto Southwell</p> <p>5. Main Street West onto Woodhouse Road and then left onto Caunton Road to Caunton and onto Southwell</p> <p>6. Main Street North to Norwell Woodhouse and onto Ollerton and Mansfield.</p>	Knessall); K (Kneesall and beyond)	<p>early operation reducing to Moderate and Adverse once planting matures and Moderate/minor and Adverse after decommissioning.</p> <p>Minimal and Neutral within 3.5km of Norwell and beyond Kneesall during all stages of the Development.</p>
<p>As stated in the Applicant's responses to JPAG's Deadline 2 Submission above, within Table 3-8 of the Report, a route-by-route sequential analysis would not provide different information to that already contained within the ES Volume 2, Chapter 7: LVIA [EN010162/APP/6.2.7A] [REP2-022].</p>			

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Norwell Parish Council [REP2-122]	<p>These routes are all utilised depending on reason for journey including shopping- Newark, Southwell and Ossington, Banking – Newark, Doctors and pharmacy – Sutton on Trent and general work/home commuting.</p> <p>All routes include line of site views of the proposed solar farm areas creating a daily sequential effect.</p> <p>We agree with JPAG that sequential views need considering along the following railway line as a minimum: • East Coast Mainline – from Newark to Tuxford We agree with JPAG that sequential views need considering along the various public rights of way within the order limits and the other approved schemes.</p> <p>We agree with JPAG that the now approved Kelham Solar Farm in combination with the development will have a cumulative impact in both spatial and visual terms. As this has already been ably covered by JPEG we do not intend to repeat the points already ably made by them.”</p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Norwell Parish Council [REP2-122]		
<i>Drainage</i>		
3	<p><i>"We note that JPAG has already acknowledged that the cable works will disturb land but may actually offer the potential for enhanced sustainable drainage through large scale percolation which could be a benefit in some areas if incorporated. However in the case of Norwell pluvial flooding from surface water run-off is a significant issue.</i></p> <p><i>Whilst Norwell and surrounding areas are not affected by large solar panel run off areas, the plans do show significant cable corridor and cable works area to the North East of the village. Norwell already experiences flooding from surface water run-off from fields adjoining the Beck via existing field gates and along roads is a principal source of surface water flooding in this area. Any works which increase the pace of run off is of concern to the local Flood Wardens who support the village. Photographic evidence of alluvial flooding affecting the proposed cable corridor area close to the Grade 1 listed church and the scheduled monument moat are available if</i></p>	<p>Following the PEIR stage, the cable corridor was removed from the area in proximity to Norwell. Sheet 1 of the Works Plans [EN010162/APP/2.3A] [AS-005] shows that none of the works will take place to the north-east of Norwell Village.</p> <p>As shown on Figure A9.5 of the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C], the Development is not within the surface water catchment of the area draining Norwell. As such the Development does not have the potential to affect surface water runoff rates in Norwell.</p> <p>Please also refer to the Applicant's responses to JPAG in Table 3-8 of this Report, regarding the drainage approach for Works Areas 2 (Cables) and 8 (Access Works), on pages 99 to 100.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Norwell Parish Council [REP2-122]	<i>required. Please note this is submitted in advance of our Parish Council meeting on Thursday, 22nd January, where Members will ratify the draft. It is not expected to change"</i>	

3.12 RESPONSES TO NOTTINGHAMSHIRE AREA RAMBLERS'S DEADLINE 2 SUBMISSION

Table 3-11 Responses to Nottinghamshire Area Ramblers' Deadline 2 Submission

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Nottinghamshire Area Ramblers [REP2-132]		
<i>Q1.1.9 Planning Benefits</i>		
1	<p><i>"We refute the applicants Planning Statement that states benefits would include an enhanced public access legacy. The only improvement to public access provided by the development are the Permissive Paths introduced to create a path around the scheme. However, Permissive Paths, by definition, are not Rights of Way. Whilst they have to remain in place for the period of the DCO, they may be withdrawn at any time thereafter by the landowner. Therefore they cannot be described as a legacy."</i></p>	<p>The Applicant remains the position that the new permissive routes would enhance the connectivity and recreational amenity of the area during the operational phase of the Development, representing a major and significant beneficial effect of the Development. ES Volume 4, Appendix A18.1: Outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1B] [REP2-082] proposes measures to manage closures, diversions, and new permissive routes to ensure continued recreational use of the PRow during construction, operation and decommissioning of the Development.</p> <p>As such, the Development has considered the PRow network and accords with relevant policy in NPS EN-3.</p>
<i>Right of Way Closures and Diversions - Kelham FP7A</i>		
2	<p><i>"This proposed diversion was previously raised with the applicant during the phase 2 consultation. We are extremely disappointed that, although we raised this again in our</i></p>	<p>The Applicant has responded to this in Table 3-21 <i>Responses to Nottinghamshire Area Ramblers of Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]</i>, at page 154.</p> <p>Kelham FP7A would be replaced with 460 m of footpath which would follow the edges of the solar PV area. The route would form a one</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Nottinghamshire Area Ramblers [REP2-132]	<p><i>submission of 1st October 2025, the applicant continues to insist on a very lengthy diversion.</i></p> <p><i>We re-iterate that this section of footpath forms part of an historical and logical route from Cauntton to Averham and Upton. The OS six-inch map (1888-1913) clearly shows this path. [Source: Ramblers DLYW website] The applicant states that "Whilst it is acknowledged that local people value access to local routes it is considered that PRow crossing arable fields generally retain limited historic character". We would point out that Kelham FP7A (a cross-field path) has been in existent for more than 100 years.</i></p> <p><i>In their proposed diversion of Kelham FP7A the applicant confirms our assertion that the proposed diversion is approximately four times longer than the current route "for users travelling east". But this misses the point. As stated, the main use of this footpath is by those travelling north to south, or south to north. The importance and popularity of this footpath is evident from a recent Google Earth photo.</i></p> <p><i>The proposed diversion is unacceptable. There are three better alternatives. 1) Remove this</i></p>	<p>continuous route between NT South Muskham FP5 and NT Kelham BW3. The length of the planned diversion would be 590 m longer for the users travelling north and south. To walk this distance at a leisurely pace would take around 9 minutes, making the scope for conflict very limited.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Nottinghamshire Area Ramblers [REP2-132]		
	<p><i>field from the scheme. This would have little impact on the generation capacity of the scheme. 2) Restrict the solar panels to the land to the west of FP7A. The FP can be screened from the panels, and the remainder of the field used for biodiverse planting. 3) Divert the footpath to the eastern field boundary. This would result in a footpath that is approximately twice the length of the current route."</i></p>	

3.13 RESPONSES TO PAUL MITCHELL AND PAMELA GLADWIN' S DEADLINE 2 SUBMISSION

Table 3-12 Responses to Paul Mitchell and Pamela Gladwin's Deadline 2 Submission

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Paul Mitchel and Pamela Gladwin [REP2-139]		
<i>Q10.1.8 Potential Compulsory Acquisition Rights</i>		
1-3	<p>Looking in the book of reference, we note that our names in the manner of Paul Mitchell, Pamela Gladwin and our business PM&G Ltd seem to appear as having a category 2 interest against land parcel 22/6, 22/7, 22/8, 22/9,</p>	<p>The Applicant has provided responses to this within Table 3-25 Responses to Paul Mitchell and Pamela Gladwin of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], at page 179 to page 180.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Paul Mitchel and Pamela Gladwin [REP2-139]		
	<p>22/10, 22/11, 22/12, 22/13, 22/14, 22/25, 22/27, 22/29, 22/30</p> <p><i>"[...] We wanted to provide this holding response in order to make it clear that we do intend to provide a full response on Q10.1.8 to the Examining Authority as soon as we are able to on our return."</i></p>	

3.14 RESPONSES TO RICHARD ALLARTON' S DEADLINE 2 SUBMISSION

Table 3-13 Responses to Richard Allarton's Deadline 2 Submission

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton [REP2-140]		
<i>Introduction</i>		
1-2	<p><i>"This discourse will limit itself to the continual experiences that will be levied on those that live or visit the areas affected by the proposed construction. It is well documented that mental health is a significant issue within the rural</i></p>	<p>The Applicant notes the concerns raised regarding landscape and visual impacts, biodiversity impacts, including potential disturbance to cropping and wildlife movement, as well as noise impacts, all of which are said to collectively contribute to mental health effects within the community.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton [REP2-140]	<p><i>community with suicide rates some 20% higher than their urban counterparts. [1] Equally it is recognised that the solace and wellbeing derived from open vistas can create a sense of space and perspective. Fields and long horizons are restful and ease the anxieties of rural living. Equally, wildlife and habitat provide an emotional grounding. Seeing crops grow, animals move through familiar annual patterns, or the seasonally changing landscapes foster feelings of continuity and belonging. This connection often reassures people that they are part of something enduring, larger than their daily worries. There is also solace in the solitude and quiet of rural life. The open spaces tend to reduce noise and visual clutter, allowing moments of reflection that are harder to find elsewhere. For many, this quiet supports creativity, spiritual reflection, or simple contentment. It is not difficult to see how these balances to the harder and more deprived aspects of existence in rural communities can be shattered by the imposition of an industrial wasteland within these areas, and the continual exposure is exemplified below. It should be recognised that these examples are hardly</i></p>	<p>Responses have been provided on this in Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115].</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses						
Richard Allarton [REP2-140]								
	<p><i>exhaustive, or even the best, but merely show how such pressures will be felt on individuals via the sequential issues imposed on travel within the community"</i></p>							
<p><i>Question 11.1.12 Comments on Cumulative Landscape and Visual Assessment</i></p>								
2-3	<p><i>"Moorhouse Routes shown in Appendix A</i> <u>Roadways</u> <i>The closest shopping towns to Moorhouse are Newark and Tuxford, both serviced by rural public transport. In addition, North Nottinghamshire has a proud tradition of cycling as a past-time and sport. Many clubs traverse the area and have spawned World and National Champions (e.g. Tom Simpson). The Tour of Britain has twice routed through Moorhouse in the last three years, heading on to the Newark stop-over. The main route from Moorhouse to Newark is via Ossington and Carlton on Trent. (Appx. A, R1) A pleasant route with initial vistas as far as Lincoln Cathedral before passing through North Wood, past Ossington Hall lake and through Lady</i></p>	<p>The Applicant acknowledges the concerns raised regarding cumulative landscape and visual effects in Ossington. The Applicant wishes to provides response in turn in response to Appendix A, B and C.</p> <p>Appendix A identifies four routes via footpaths and local roads, these are:</p> <table border="1" data-bbox="1039 887 2056 1396"> <thead> <tr> <th data-bbox="1039 887 1308 995">Route</th> <th data-bbox="1319 887 1565 995">Receptor Groups</th> <th data-bbox="1576 887 2056 995">Effects</th> </tr> </thead> <tbody> <tr> <td data-bbox="1039 1003 1308 1396">R1: Local roads from Moorhouse via Ossington Road to Carlton-on-Trent and A1</td> <td data-bbox="1319 1003 1565 1396">E (Moorhouse to Ossington); F (Ossington to A1)</td> <td data-bbox="1576 1003 2056 1396">Moderate and Adverse between Moorhouse and Ossington, and Major/moderate and Adverse (significant) between Ossington and Carlton-on-Trent during construction and Early operation. Minor and Adverse between Moorhouse and Ossington, and Moderate and Adverse between</td> </tr> </tbody> </table>	Route	Receptor Groups	Effects	R1: Local roads from Moorhouse via Ossington Road to Carlton-on-Trent and A1	E (Moorhouse to Ossington); F (Ossington to A1)	Moderate and Adverse between Moorhouse and Ossington, and Major/moderate and Adverse (significant) between Ossington and Carlton-on-Trent during construction and Early operation. Minor and Adverse between Moorhouse and Ossington, and Moderate and Adverse between
Route	Receptor Groups	Effects						
R1: Local roads from Moorhouse via Ossington Road to Carlton-on-Trent and A1	E (Moorhouse to Ossington); F (Ossington to A1)	Moderate and Adverse between Moorhouse and Ossington, and Major/moderate and Adverse (significant) between Ossington and Carlton-on-Trent during construction and Early operation. Minor and Adverse between Moorhouse and Ossington, and Moderate and Adverse between						

Page Ref.	Summary Position of Interested Party	Applicant's Responses		
Richard Allarton [REP2-140]	<p><i>Elinor's Plantation, after which the countryside again opens to views down to Sutton on Trent, Carlton on Trent and further south. This route joins the Old Great North Road (B1164) and then the A1 towards Newark, passing through the Carlton and Cromwell affected areas. This route directly abuts fields of planned solar panels N11, N12.4, E1, E2, E3, E4, E6 and E7. However, the vistas across open countryside, particularly on the return journey will also be affected by solar panel fields E5, E8, E9, N1, N2, N5, and N7.</i></p> <p><i>The route to Tuxford and further North travels due north past the large expanse of planned solar panel field N1 before passing the existing Egmanton Solar Farm and down on to the Old Great North Road (B1164). Here it will be confronted by the planned Tuxford Road Solar Farm across the fields opposite. (Appx. A, R2). It will be impossible to leave the village without being 'funnelled' through this imposed industrial landscape.</i></p> <p><i>Footpaths Walks in and around Moorhouse are frequented by various rambler groups as well as locals, this being an area of quiet recreation</i></p>			<p>Ossington and Carlton-on-Trent once planting matures.</p> <p>Minimal and Neutral after decommissioning.</p>
		<p>R2: Local roads from Great North Road, crossing the A1 and continuing along Weston Road/Moorhouse Road, to Moorhouse</p>	<p>E (Moorhouse to the A1); G (east of the A1)</p>	<p>As reported for Group E road users, effects on Group G would be Minimal and Neutral during all stages of the Development.</p>
		<p>R3: From Weston via Wadnall Lane and crossing the A1 via PRoW to Moorhouse</p>	<p>E (Moorhouse to the A1); G (east of the A1)</p>	<p>As reported for Group E PRoW users, effects on Group G would be Minimal and Neutral during all stages of the Development.</p>
		<p>R4: From Moorhouse around Ossington</p>	<p>E (Moorhouse to the A1); G (east of the A1)</p>	<p>This route does not follow PRoW.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses			
Richard Allarton [REP2-140]	<p><i>and solitude. Key walks include heading south and into North Wood to then loop around the old airfield. (Appx. A, R3) It is unclear whether access onto the peritrack will remain but if so, the whole loop will be within a security fenced walkway.</i></p> <p><i>Current views are wide ranging (airfields tend to be high on vantage points) with views of Lincoln Cathedral and the Lancaster Memorial on the A46 (with binoculars!) to the east and Mansfield to the west. Any form of view and the solitude and sense of history bought by this open expanse will be lost as the northern airfield is entirely covered in the solar panels of fields N12.1 – N12.4. As an RAF Veteran of some 32 years service, it is of particular concern what if any of the existing infrastructure will be allowed to remain in recognition and remembrance of these past, strident times. In addition, placing solar panels in fields N1, N2, N7 and N10 will all compromise the vistas of the walk and its recognised therapeutic value.</i></p> <p><i>Another popular walk is from Moorhouse to Weston along the existing footpaths. (Appx. A,</i></p>	<table border="1" data-bbox="1032 411 2054 504"> <tr> <td data-bbox="1032 411 1308 504">Airfield and to the A616</td> <td data-bbox="1308 411 1563 504"></td> <td data-bbox="1563 411 2054 504"></td> </tr> </table> <p>The additional LVIA figures presented within Appendix C of Responses to ExA's First Written Questions [EN010162/APP/8.22A] illustrate the effects summarised above, with ES Volume 3, Figure 7.6: Visual Receptors Before Mitigation [EN010162/APP/6.3.7A] [AS-035] and ES Volume 3, Figure 7.7: Visual Receptors After Mitigation [EN010162/APP/6.3.7A] [AS-035] showing the detailed assessment.</p> <p>With regards to the route around Ossington Airfield, the Applicant's understanding is that the route described, which passes through North Wood and then loops around Ossington Airfield, is informal, as there is no right of way or open access land in these areas. Solar PV is proposed on the location of Ossington Airfield, and so no access will be available to this area. However, New Permissive Footpath 8 has been proposed which would originate from Ossington Road, follow the edge of Pamela Plantation adjacent to the airfield, before heading west across the field to the existing track which links to the unnamed road at grid reference 474659E, 364846N. Solar PV will be present to the north of the route, with a minimum of 10 m between the centre of the route and the solar PV panels. Views to the south would remain open. This route forms a network of routes which aim to improve connectivity in the north-western area of the Order Limits, linking Kersall to Ossington and Moorhouse. The new Permissive Footpath 8 is shown on Sheets 23, 24 and 29 in the Public Rights of Way Diversions and Permissive</p>	Airfield and to the A616		
Airfield and to the A616					

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton [REP2-140]	<p><i>R4) This follows the Beck down past Thorpe Farm before crossing the open countryside towards the Motte and Baily castled village of Weston, crossing the A1 before coming to the popular Tea House at Hall Farm. The highlighted route will be severely compromised, being completely surrounded by solar panels in fields N1, N2, N3, N4, N5, N6 and N7. The gerrymandering of the fields in which the footpath currently runs is unclear, as are any diversions (indicated) but is clear that large swathes of this pleasant walk will now be abutted against security fencing. This pathway is also a bridleway. Horse riders as well as walkers use the route, which joins up with two other bridleways; one of which heads towards Sutton-on-Trent coming out just down from the entrance to Crow Park Farm, near to Common Farm. The other bridleway brings you out near to The Grange on the edge of Ossington Village. These further bridleways path past/through the planned solar panel fields N5, N6, N7, N8 and N9. Again, walkers and horse riders will walk or ride through corridors of security fencing and solar panels. The bridleway which comes out at Corner Farm will</i></p>	<p>Routes Plan [EN010162/APP/2.4A] [REP2-004], coloured in purple dotted line.</p> <p>Visual effects on Ossington Airfield are specifically addressed within Table 4-13 <i>Responses to Ossington Solar Concerns group</i> of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], pages 256 - 257. This confirms that the airfield is classified as ordinary farmland for policy purposes. It further suggests that, once mitigation planting has matured, increased enclosure from hedgerows would reduce effects to medium-scale adverse, with no significant residual effects.</p> <p>In relation to policy on sequential assessment, the Applicant refers to responses to ExQ11.1.1(2)(c) in Responses to ExA's First Written Questions [EN010162/APP/8.22A], pages 124–125, together with the Applicant's responses to NSDC LIR 8.27 – 8.39, in Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], pages 78 to 79. Sequential assessment has been undertaken both at site level and across the agreed 2 km LVIA study area, incorporating all operational and consented projects.</p> <p>Sequential assessment requires consideration of how the experience of routes through the landscape pass the other developments, that may influence the effects experienced from the proposed development, and the Applicant confirms that this has been appropriately addressed within the LVIA.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton	[REP2-140]	
	<p><i>also be shut for considerable time whilst the solar panels are being installed.”</i></p> <p>The submission from Richard Allarton also included a quote from a local residents, showing the depth of feeling on the landscape and visual impact.</p>	
3-4	<p><u>“Hedging and Repurposing</u></p> <p><i>It is bizarre to suggest that the planting of hedging will mitigate the visual effects of solar panelling. The naturally undulating landscape would require trees many ten’s of meters high (see Appendix C) to hide, and yet the acknowledged beauty and benefit of this area are its open vistas. (Newark & Sherwood Land Character Assessment [2]). Associated with this is the repurposing of fields to generate wooded, pastured and riparian areas from previously agricultural land. Such actions are supported (with caveats) by interest groups, including Notts Wildlife Trust and similar, but it is clear that little assessment of the change and effect to local environments has been carried out. The apparently virtuous nature of repurposing blinds to the negative effects that may be caused in the longer term, exemplified in</i></p>	<p>The Applicant considers that the planting of hedgerows as mitigations is a standard approach. Responses to this concern is set out within Table 3-3 Responses to Carlton on Trent Parish Council of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 24.</p> <p>With regard to the Applicant’s approach to the habitat creation and planting, and the consideration of protected species, including barbastelle bat is summarised in <i>Table 4-2 Ecology and Biodiversity</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], pages 276 to 279.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton	[REP2-140]	
	<p><i>the tree planting planned to extend North Wood. This will be immediately adjacent to an area where the extremely rare and protected Barbastelle Bat has been sighted. Effects on this rare species will be unknown until after the event. Such actions cannot be seen as other than a marketing ploy to garner support from specific pressure groups and allow the renaming of the project to be superficially more acceptable.”</i></p>	
4	<p>“Ossington Input from Ossington Resident</p> <p><i>The black hatched lines (Appendix B) indicate a route that this family take as a school/work journey. On a school day this will be between 6 to 10 times a day. The route shown is about 7 miles long and apart from a stretch between beyond Knapthorne there are Solar panels in some form in continual view. The majority of panels are behind hedges. Unfortunately, these do not obscure the panels due to the relative heights and the generally rising ground either side of the route. The lack of leaves in winter enables the panels to be easily visible though the hedges and occasional copse. There are</i></p>	<p>Appendix B (page 10) of the Interested Party’s submission identifies the Ossington route, extending from the route around Ossington Airfield along Knesall Road to the A616, and then along the A616 to Newark Road/Cauntton Road. Point A, as indicated by the Interested Party, corresponds to Viewpoint 33 (Road west of Ossington), and Point B corresponds to Viewpoint 7 (A616 near Kersall Lodge). Point C, identified as the A616 near Cauntton Common Farm, is not one of the assessed viewpoints.</p> <p>The Applicant has responded to the effects identified at Viewpoints 33 and 7 in response to Question Q11.1.2(c) in the Responses to ExA’s First Written Questions [EN010162/APP/8.22A], on page 108.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton [REP2-140]	<p><i>several examples where the impact of the panels is overbearing or blocks amazing views: e.g. Point A where the view of the panels is a close, very unattractive view of the back of the panels and also an extensive view as the field rises gently and the panels extend to the brow of the hill. Point B, where there is an extensive and wonderful view over the Trent Valley, Newark and on to the Lincoln escarpment. Point C where the extent and proximity of the fields dominate a view of landscape of undulating fields and hedges. Leaving the GNR Solar Farm area the route is immediately engulfed by the already approved Knapthorpe Grange and Muskham Grange solar farms. Elements Green's Landscape Visual Impact Assessment says that the development essentially consists of discrete panels, generally on flatter areas. This encourages thought that their impact is limited. However, these three maps contradict this and show how the majority of panels are grouped alongside the road in a landscape where the undulating nature can mean panels can be views from long distances and wide areas."</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton [REP2-140]		
<i>Question 1.1.9 Planning Benefits</i>		
4-5	<p><i>"The above are but a few of the social examples of what will be felt and observed across the affected Parishes. But perhaps this is a price worth paying? If we can alter the direction of Climate Change, such losses will have altruistically been for the greater good. Unfortunately, the simple fact is that such a project will not deliver the benefits of helping stem Climate Change, indeed, it will exacerbate it. In his seminal work, "Sustainable Energy - Without all the Hot Air" [3], Prof. DJC McKay describes the significant costs associated with wind and solar deployment in this country and their minimal value in these northern latitudes. This is further exemplified in his work "Solar Energy in the Context of Energy Use, Energy Transportation, and Energy Storage" [4] which uses the metrics of energy output per sqm and population density per sqm. Considering UK solar output, he asserts that meeting population energy needs is uncomfortably close to requiring total UK land mass! Interestingly, his value of 4watts/sqm output on solar panels (Northern</i></p>	<p>Table 4-11 <i>Principle of Development</i> of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 329, provides the Applicant's responses to the need for development.</p> <p>Responses on carbon saving calculations and the assessment of greenhouse gas emissions arising from the Development are provided within Table 4-5 <i>General of Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115]</i>, on page 296. This is further supported by the Applicant's responses to Action Point 7 of the hearing, as set out in Table 2-1 of Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19] [REP1-068], at page 45. The Applicant then provides a calculation of the greenhouse gas (GHG) emissions in Appendix 2 of the document, on page 57.</p>

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton [REP2-140]	<p><i>Europe figure, but derived from lower latitudes than UK) is not dissimilar to Element's Green's own claim for 800MW (and utilisation factor) from 4,300acres. The impracticalities of this solution are stark. And this is not from some crank, David McKay was Cambridge's first Regis (Royal appointed) Professor and the UK's leading expert in energy sustainability until his untimely death. As mentioned in previous submissions to the Inspectorate, Prof. McKay's contentions are taken further in the equally prestigious work (first quartile publication) by Ferroni et al in their work "Further considerations to: Energy Return on Energy Invested (ERoEI) for photovoltaic solar systems in regions of moderate insolation" [5]. In this they explicitly demonstrate that solar panels deployed above 45N latitudes will not produce as much energy in their lifetime as was used in their production. Again, the implications are stark: using solar panels at these latitudes will not reduce climate change, but will accelerate it. A price worth paying? Only if the gains to Climate Change can be argued as being comparable or better than the total losses (beyond the social issues</i></p>	

Page Ref.	Summary Position of Interested Party	Applicant's Responses
Richard Allarton [REP2-140]	<i>highlighted) endured. Yet credible experts in the field contend quite the opposite. This desecration of the countryside is far from an altruistic action for the greater good, but more a selfish and opportunistic activity by those who will make significant profit, without care of the effects, local or global. It should be rejected."</i>	