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Issue Specific Hearing 3 Environmental Matters – JPAG

Wednesday 4 February 2026

Summary Record of Oral Submissions of Anthony Northcote on behalf of JPAG

Interested Party Reference [REDACTED]

Great North Road Solar and Biodiversity Park - Project EN010162

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Item 1 - Landscape and visual

1.1 The existing landscape character and qualities of the study area

1.2 The methodology for assessing the significance of landscape and visual effects

The issue sequential views and how the landscape in totality is considered. It is helpful to have a bit of an understanding how is the landscape evolved. The quadrant that we're talking about was largely known as the Dukeries. It was comprised of Sherwood Forest then large Ducal estates, this has led to a patchwork of arable fields. Giving a patchwork quilt type of landscape, that become very uniform as a result of the solar, which will be an industrialized type of landscape. The development will result in the loss of the overall mixed bag of character to one that's much more uniform.

The impact for some of the settlements, are that the impact is not picked up by a viewpoint because they're sitting in the middle of the doughnut, or big C shaped semi-circle however you may want to describe the project. Because of the way other constraints work such as bridges, etc., there are some settlements that you cannot leave without going through the project on every journey, every day.

There is no straightforward methodology for assessing this sequential impact. JPAG wants the examining authority to understand and give consideration to this factor beyond the normal standard methodology for assessing landscape impact.

1.3 The assessment of landscape and visual effects

1.4 The approach to assessing cumulative landscape effects

Coming back to the issue that we brought up previously about concentration. The written ministerial statement on solar, refers to the need to consider concentration, in addition but separately to cumulative effects.

The draft NPPF suggests that the written ministerial statement may be withdrawn, but it remains in force for this examination.

In our written representation (Rep1-093) we put some plans in that showed all the other consented schemes against GNR. We also detailed this in our response to the first set of questions from the examining authority (Rep2-130).

For us it's about the overall scale of change, the overall impact on the landscape experience, the strategic impact and in particular the concentration that comes from a whole variety of schemes.

In terms of other NSIPs there is the One Earth solar proposal, but we also have the other schemes that have been consented, which are all to an extent concentrated very much in the south east corner of the GNR scheme. There is a clustering type of impact, around for example Staythorpe.

The standard methodology for assessing cumulative effects, doesn't really perhaps anticipate such a clustering or a concentration of everything together in the way proposals are planned in this case. It is also how you capture that overall scale and degree of change for such a long period of time, from one project to another.

As the Inspector in the Kelham solar scheme identified it is for the ExA for GNR to now consider when it comes forward the cumulative effect. In essence, we have got a lot of permitted schemes. They're not there today, but they will be coming along, all at the same time. Where and how these are put into the baseline in terms of assessing the concentration of schemes together is the challenge. JPAG wants the examining authority to be alive to that issue, and we are asking the ExA to give that an appropriate degree of consideration.

The applicant claims that because there is no direct intervisibility between One Earth and GNR that this limits landscape effects. However, the issue for JPAG is that whilst we accept the topography, does limit the visibility between these two schemes; because One Earth is in a valley and there is a small ridge because meaning that you haven't got direct into visibility. What is being missed here is the fact that in that gap in between, there are other two other permitted solar schemes. As well as the East Coast Main Line corridor and the A1. So, there is major infrastructure already, plus additional planned solar proposals between One Earth and GNR.

Impact is not about the fact that you can't see from one to the other, but the scale of landscape change in that area, is significant in our view, because what's happening in-between is drawing those two schemes, which are theoretically some distance apart, closer together in perceptual terms.

If you live in that area between the two NSIP schemes, such as at Weston then you're going to be surrounded by all these various developments. Not forgetting that because infrastructure including the East Coast Main Line, you have limited routes that you can take in this area with only a few level crossings and one bridge. Moving around this area, again the impact of sequentially moving through one solar scheme and then another will have an impact.

The difficulty with the zones of theoretical visibility, is that is just one element of the perception of landscape change. A more coherent approach to how the overall landscape character is being altered shouldn't be lost in consideration purely based on whether or not there is direct visibility.

1.5 The approach to mitigation and enhancement

1.6 Detailed design control and management

With the intermediate substations, there is a balance between operational accessibility and the need to ensure that appropriate mitigation and enhancement in the form of screening from the roads and other public vistas.

A useful example is to look actually at the existing national grid station at Staythorpe. That mitigates its impact by a combination of intermediate land in the form of a field gap together with hedgerow planting.

Care is needed with the design of intermediate substations to not replicate the position we have with the Staythorpe BESS scheme currently under construction. In that scheme, where in order to achieve visibility screens there was a need to translocate hedgerows. The problem with that process is then effectively you've lost the entire mature hedgerow to start with because it has to be cut down to almost ground level to achieve translocation.

We would ask that that care is taken to ensure that the operational requirement is balanced against the appropriate screening and the detailed layouts when done achieve a buffer zone away from the road to reduce the impact.

Item 2 - Ecology and biodiversity

2.1 Concerns raised around the ecology and biodiversity assessment methodology and baseline, including the aggregation of habitats within the assessment, and potential implications on the assessment conclusions and significance of effects

2.2 Effects on ecological receptors, including aquatic invertebrates and birds, and any relevant mitigations within the oCEMP and oLEMP

Picking up one point the applicant raised about no impact on Ancient Woodland, in some areas, the scheme actually immediately abuts ancient woodland. An example is Cheveral Wood, which contains a very large pond within it. That is ancient woodland and is going to be surrounded within ten metres on three sides with solar panels.

2.3 Concerns raised around the Biodiversity Net Gain assessment and whether its conclusions may change after further survey work

2.4 Effects on the Humber Estuary SAC and the need for an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations).

N/A

Item 3 - Construction effects

3.1 Noise - airborne noise effect thresholds, assessment, findings, controls, EN-1 classification of weight

A point that has become apparent in the last couple of weeks is the issue of whether piling will be needed on any of the sites. Currently piling is being undertaken on the Staythorpe BESS site and is actually creating much more noise than you would anticipate. I went past at the other day, and it was the exceedingly noisy. Piling activity is not necessarily over just within days but can go on for many weeks, so if piling is actually envisaged to be necessary on the BESS site, for example, and on the intermediate substations then noise impact would arise. This is a particular construction impact that can go on for several weeks and could be quite a bad neighbour.

3.2 Land and water contamination - approach to risk in the oCEMP and as reflected in the applicant's SoCG with the Environment Agency [REP2-091]

Although largely a matter for item five, some of the land that's within the site and some of the accesses that are proposed to be used or created, are actual existing sources of surface water runoff that come off the order limit site, bringing suspended solids into watercourses resulting in contamination. This needs to be considered, including through an appropriate drainage strategy.

3.3 Traffic, transport and access with reference to SoCGs with National Highways [REP2-093] and Nottinghamshire County Council [REP2-087]

- Update following additional information provided by the applicant
- Remaining concerns of NCC including temporary and permanent changes, adequacy of design information, adequacy of order limits
- Residual effect classification

There is disagreement here is on what are matters of principle that need to be resolved now versus what are technical details for later on. The concern that we would have with the applicant's approach is they wanting to leave too much to later on.

In particular aspects such as creating access visibility splays generally has an impact on other things. To create a visibility splay you often have to remove hedgerows that can then have a knock-on impact on ecology, landscaping and screening. So, technical details can undermine the approach of mitigation and enhancement. This is what happened at Staythorpe BESS where to create the visibility splay, they've had to translocate the hedgerow which has now undermined all the conclusions of the LVIA that assumed the existing hedgerow was to remain and be reinforced.

JPAG is concerned that transport and access details are integral to matters of principle that need to be resolved now in terms of dealing with the acceptability and assessing the full impacts of the development.

We agree with the County Council that a stage one road safety audit is required for some of the access routes proposed. We specifically identified the proposal to use the existing public highway junction with Ossington Road and the B1164 at Sutton on Trent. That is a junction where any person visiting rather than doing a desk-top study would immediately realise that when exiting Ossington Road you can see absolutely nothing to the south because of the A1 overbridge.

We would support the County Council in relation to the passing places which we consider need to remain in perpetuity and not be removed. We have a terrible road network. It's difficult to maintain whenever you get intrusions in the verge adjacent to the carriageway and you try and remove it; then the carriageway starts to fall away. To remove some of the passing places will put a long-term maintenance liability back on the County Council, which is unfair. Whereas if they are retained then the same long term impact from unnecessary disturbance would not arise.

There are some elements and some concerns I think, that can legitimately be dealt with later on, for example, like the phasing and overlapping of things like road closures, traffic management measures that might impact on communities that can be dealt with through the construction and

environment management plan or traffic management plan. But JPAG do support the County Council in that a number of these matters that they're saying to be dealt with later are actually matters of principle that need to be resolved now.

Item 4 - Cultural heritage and archaeology

4.1 Whether the scoping out of certain heritage assets has been justified

4.2 Whether the assessment of the significance of effects on heritage assets has been adequate and reasonable

4.3 The approach to mitigating effects on designated and non-designated heritage assets

4.4 Whether the historic landscape context, including unregistered parks and gardens, has been adequately recognised

This area was largely comprised of large Ducal estates. If you take Averham Park for example, which is an unregistered historic park and garden, there remains today remnants of the Ducal estates in Chevreral Wood, there are stones in the wood that relate to when that was part of the parkland. So, the traditional parkland for Averham Park was very extensive. It was a hunting park. It included all the areas around there that's now farmland that's proposed to be part of the scheme. Chevreral Wood is the remaining part of that woodland that formed the hunting park.

These historical connections have changed over time, but the development is going to erode that functional, traditional historical connection further and how that needs to be taken into account in the assessment process needs to be fully considered. The traditional estate landscape, and the further erosion of that landscape pattern needs to be considered.

4.5 Whether the extent of ground truthing by the desk-based assessment and pre-consent field evaluation is sufficient to assess the extent of the archaeological resources and inform significance and impact

4.6 Whether post consent geophysics and trial trench evaluation would resolve pre-consent deficiencies

4.7 Whether risks of non-intrusive works have been appropriately recognised/would be appropriately managed

4.8 The drafting of dDCO requirement 11 - archaeology (if not previously covered)

N/A

4.9 The effects of development on the former Ossington Airfield

Ossington Airfield was first put on to the historic environment record in 1966. So, it has been there a long time, and there are two entries on the historic environment record, one for the airfield itself and one for the battle headquarters.

When the airfield was built, um, it was a classic type A airfield from World War Two, it had three runways. When built it blocked up the public road completely so you could no longer get across. When the airfield closed, the public road was then given a new alignment, taking the alignment of two of the runways, which is why it follows an S shape across the airfield.

In the last few years, the community has been very active in terms of improving the visitor experience of the if the airfield. There are visitor interpretation boards, and a couple of years ago, after a long time of trying there is at long last, a new memorial on the centre of the airfield. It's just off the public road, uh, just on the northern side. You do get visitors from Canada in particular.

Whilst there isn't strictly public access onto the airfield, the northern part of the airfield in particular is used almost every day by people walking along the former tracks and runways. The landowner has never restricted access in any way and therefore actually outside of this process, probably if somebody wanted to make a claim for establish a public right of way on the basis of use over 20 years that would undoubtedly probably be successful.

Whilst in strict terms the public road goes through the middle. There has in effect been de facto acceptance that the public do wander across the northern part of the airfield unfettered. It is that northern part where the panels are proposed, is where the majority of the former structures are located.

From our perspective, JPAG would say that the airfield is worthy and it should be considered to be a non-designated heritage asset, for which there is a direct impact being undertaken. Whilst I would fully accept that the panels are not going to be sited on land where any of the former structures are located; what you would lose from the panels would be the current open vista that allows you to understand where everything sits in relation to each other.

In terms of the significance of how that would impact directly on the experience of the airfield, if you go and put a whole load of elements in the middle involving solar panels, that means that the primary significance of the airfield would be lost. That significance is the ability to still see today the full outline of the airfield in uninterrupted views and vistas. If you look on an aerial

photograph, you can see that that outline that was put down in the 1940s as a bomber war base remains. That is very unusual for the airfields in and around the county. The community are gravely concerned that the experience that people have of the airfield today would be completely eradicated and lost through the proposal.

Item 5 - The Water environment

5.1 If and how the Proposed Development meets the Exception test set out in NPS EN-1 and the NPPF

5.2 The Flood Risk Assessment (FRA) and its modelling parameters, with particular reference to the CCP1 dataset used for climate change allowances

5.3 The conclusions of the FRA and the level of detail provided in the assessment

5.4 Concerns raised by the Environment Agency relating to water quality, groundwater and contaminated land

On the issue about surface water run-off, sir, this relates to the ExA question, 13 .1.6 in the first set of questions. I note that in the applicant's response to that, they only addressed work areas six and seven, but not work area eight relating to accesses, despite the ExA question including reference to work area eight.

In our response to the first set of questions from the ExA we've provided details of a whole list of proposed access points that are proposed to be created that appear to be located in areas of high or medium risk of pluvial, i.e. surface water flooding. Some of those also correlate to the example that you've had in a representation (RR 169) from Mrs. Gladwin, detailing how the surface water came out through one of those accesses and then into their land.

There still remains an unanswered question, in particular the accesses and how drainage and surface water run-off from existing accesses that are being improved, or new ones to be created are not going to exacerbate or lead to additional surface water run-off flooding. Because at the moment, in essence, they just seem to be going to create new, hard-standing in areas that are already at risk and have pathways of surface water flooding, which are not assessed by any drainage strategy or clear mitigation measures.

5.5 The control of contaminated surface water in the event of a BESS or substation fire

N/A