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25th March 2026

Dear Sir/Madam

**Ref: GREAT NORTH ROAD SOLAR PARK DEVELOPMENT CONSENT ORDER (DCO)
EN010162 – THE EXAMINING AUTHORITY’S WRITTEN QUESTIONS EXQ1**

I write in response to the Examining Authority’s (ExA’s) written questions and requests for information (ExQ2) issued on 4th March 2026 and to provide the response of Nottinghamshire County Council (NCC) (Interested Party [REDACTED]) in relation to those questions which are addressed directly to NCC, or the Interested Parties where relevant to the responsibilities of NCC.

ExQ1	Question to:	Question	NCC Response
2. Development Consent Order – Schedule 2 Requirements			
Q2.2.12	NCC	Requirement 7 - Fire safety management a) Please could Nottinghamshire County Council (NCC) confirm, having consulted with the Nottinghamshire Fire and Rescue Service, that it is satisfied with the wording of this requirement and the content of the outline fire safety management plan [REP3-039]. b) If not please could proposed amendments be provided?	NCC has consulted with the Nottinghamshire Fire and Rescue Service (NFRS) and the NFRS has confirmed that it is satisfied with the wording of Requirement 7 (Fire Safety Management Plan) and the content of the outline fire safety management plan [REP3-039]. No amendments are proposed.
Q.2.2.13	The applicant, NCC and Historic England	Requirement 11 - Archaeology The ExA understands that revision 5 of dDCO [REP3-004] contains the applicant’s latest drafting of this requirement, following discussion with NCC and consideration of their preferred wording, as set out in their response to ExQ1 [REP2-123]. However, NCC’s post hearing submission [REP3-108]	NCC has engaged further with the Applicant with respect to the wording of Requirement 11 and has reached provisional agreement. The Applicant has since shared a final draft which NCC will review. Once agreed, this will be reported through the Statement of Common Ground.

		<p>indicates that parties are still some distance apart on the drafting of this requirement. The ExA also notes that the latest statement of common ground (SoCG) with Historic England (HE) indicates that there are concerns with the wording of this requirement [REP3-077].</p> <p>The ExA therefore requests that:</p> <p>a. The parties continue to work together with a view to reaching agreement of the drafting of this requirement</p> <p>b. In the event that differences remain, each party is asked to set out clear justification for their positions in relation to the areas of difference.</p>	
Q2.2.15	NCC	<p>New draft requirement - Detailed highway approval</p> <p>In its post-hearing submissions [REP3-108] NCC has proposed draft requirement for inclusion at Schedule 2 of the dDCO in relation to this. Can NCC identify precedent for this in made solar DCOs, other made DCOs or justify it in relation guidance or other reasons?</p> <p><i>(X) Detailed highway approval</i></p> <p><i>(1) No construction works shall be undertaken in the adopted public highway until the detailed design of those works has been submitted to and approved in writing by the county authority including:</i></p> <p><i>a) A programme for the works, details of the construction method and traffic management requirements;</i></p> <p><i>b) A detailed design pack of drawings and specifications detailing the works and any service / utility works that may need to be accommodated,</i></p>	<p>NCC cannot identify precedent for the detailed highway approval to be secured through a standalone requirement. However, it is common practice for details of vehicular and pedestrian access to be submitted to and approved by the planning authority as a component of the detailed design approval (in this case Part (f) of Requirement 6 in the dDCO).</p> <p>Therefore, the principle that technical drawings and specifications must be provided is well established and already agreed. The purpose of the suggested requirement is to ensure that all other necessary information to ensure highway safety is provided alongside these plans and that this material is discharged by the Highway Authority, rather than the Planning Authority.</p> <p>The wording of the suggested requirement was contained within the Outline Construction Traffic Management Plan (CTMP) relating to Springwell Solar Farm (REP4-028, p.20). The Applicant has also included this wording in its own Outline CTMP (REP3-035). This requires the developer to set</p>

		<p><i>informed by additional surveys including topographical surveys and additional speed survey data;</i></p> <p><i>c) The necessary health and safety information required under the Construction, (Design & Management) Regulations, or their equivalent at the point of submission;</i></p> <p><i>d) Details of the proposed contractor, including their insurance provisions;</i></p> <p><i>e) If required by the county authority the appropriate stage Road Safety Audit (RSA)</i></p> <p><i>f) Details of any necessary road signage and road markings; and</i></p> <p><i>g) Details of any proposed remediation proposals should the works not be permanent.</i></p> <p><i>(2) The authorised development must be carried out in accordance with the approved details.</i></p>	<p>out how they will obtain technical approvals for highway works through the detailed CTMP to be discharged under Requirement 14. As such, the principle of providing this information has been agreed.</p> <p>NCC would prefer this duty to be secured through a requirement rather than concealed within the Outline CTMP. This would ensure greater transparency of the technical approval process and ensure the duty is not diluted when the detailed CTMP is submitted, given that this must only be 'substantially in accordance with' the Outline CTMP.</p> <p>NCC would reiterate that the principle of securing technical approval for works to the adopted highway is well established. The proposed requirement merely assembles duties into a single approval which is clear and easily understood by all parties. Absence of precedent is not, in itself, a reason not to include a requirement if the ExA considers it necessary to do so.</p>
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4. Biodiversity, ecology and the natural environment

Q4.2.1	NSDC, NCC, and Natural England	<p>Mitigation and Enhancement</p> <p>With regards to mitigation and enhancement measures, and how these have been considered by the applicant in its assessment of effects on ecology and biodiversity, could the parties please address the following points:</p> <p>a. If you have any comments on the applicant's position on its approach to mitigation and enhancement, as set out in paragraphs 1.6.12 to 1.6.15 of [REP1-068] (and in [EV3-005])</p> <p>b. Do you agree with the applicant that an approach where enhancement accompanies mitigation, rather than the two being separate, represents good practice?</p>	<p>NCC has no further comments on the applicant's position on its approach to mitigation and enhancement and is overall satisfied that the mitigation measures are adequate with some going beyond what is required to form enhancements.</p>
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7. Construction Effects			
Q7.2.1	NCC	<p>Site access</p> <p>The ExA understands from the deadline 3 SoCG between the applicant and NCC [REP3-070] that there remain outstanding issues including site access design drawings and safety audits.</p> <p>(a) Does NCC consider that the powers and controls in the dDCO [REP3-005] including articles 16,18 and requirement 14, in association with the outline construction traffic management plan (oCTMP) [REP3-035] are insufficient to prevent an unacceptable impact on highway safety?</p> <p>(b) If the answer is yes please could NCC provide proposed amendments to the dDCO and the oCTMP?</p>	<p><u>Part (a):</u></p> <p>Yes – the controls in the dDCO and the OCTMP are insufficient to prevent an unacceptable impact on highway safety. This is because there are several accesses that do not meet the required visibility standards or have not been properly demonstrated to meet the required visibility standards. It is noted that the applicant is proposing to control visibility deficiencies during the construction phases through vegetation and traffic management, however the vast majority of the accesses are intended to remain in use during operation with no maintenance regime proposed.</p> <p>In total, there are 15 accesses where hedges are required to be coppiced to 0.6m during construction and a further 9 accesses where hedges are required to be trimmed back during construction. Whilst the oCTMP makes allowance for their maintenance during construction, there are no proposals for maintenance during the operational phase, and nor is this considered to be practical where coppicing is required as this results in vigorous growth. The applicant has proposed use of banksmen during the operational phase at such accesses where visibility is deficient. This would mean that banksmen (second operatives) will be crossing roads where visibility has been proven to be deficient. The suggested methodology also introduces a convoluted and unrealistic access regime.</p> <p>There are also highway safety concerns that do not relate to visibility but instead arise from their interaction with the surrounding network. There are 4 accesses with possible layout safety issues (not necessarily visibility related). In the case of PA01, the access is located on the A617 in close proximity to a signal controlled</p>

		<p>junction. This creates a risk that drivers approaching on a green signal will not anticipate vehicles ahead slowing or stopping to turn into the access. This risk is heightened during the operational phase, when the access will not be temporarily signed and heavily used, and is instead likely to be used by smaller, faster moving vehicles rather than the larger, slower agricultural vehicles currently associated with the site.</p> <p>Both the above access on the A617 and those proposed on the A616 fall on the Nottinghamshire 'resilient network' which are considered to form part of our major road network, falling just below trunk road category and are therefore of significant importance. It is therefore considered key that such proposals are demonstrated to be acceptable prior to consent.</p> <p>There are 19 accesses where speeds have been assumed which means that the visibility spays are in abeyance. Relevant speed surveys are required to establish if the visibility splays are adequate.</p> <p>Furthermore, the applicant has also not provided any further information in relation to the passing bays and their intervisibility, to confirm safety.</p> <p>In summary, NCC believes that there are fundamental safety issues with a significant number of accesses that would be authorised by the DCO and that the issues cannot be adequately addressed during the operational phase.</p> <p><u>Part (b):</u></p> <p>The Applicant should address the fundamental visibility issues described above and provide a Stage 1 Road Safety Audit for those accesses where there are possible layout safety issues prior to consent being granted to demonstrate that the access points and passing bays are safe.</p>
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8. Cultural Heritage and archaeology			
Q8.2.5	NCC and HE	<p>Post-consent archaeological investigations</p> <p>During ISH3 [REP3-101] the applicant explained that the outline archaeological mitigation strategy (oAMS) [REP3-056] has been updated to address NCC's concerns about the risk to the archaeological resource on the basis of current investigations, their request for additional detail on the post-consent archaeological investigations and also assurance that the process could be appropriately managed. The ExA also notes that HE have questioned the completeness of archaeological investigations [REP1-081].</p> <p>The respective parties are asked to address the following points:</p> <ol style="list-style-type: none"> a. For NCC, this matter is noted as being under discussion in the SoCG [REP3-069]. NCC are asked to provide clarification on whether the revisions made address their concerns, and if not what further provision they would wish to see in the oAMS. b. HE are invited to provide comment on whether the approach to post-consent investigation in the revised oAMS addresses their concerns, and if not what 	<p>NCC has engaged further with the Applicant with respect to the oAMS and understands that an updated version will be submitted at Deadline 4. The content of the updated oAMS has provisionally been agreed and NCC will review the final version once submitted with progress to be reported through the SOCG.</p>

		further provision should be require.	
Q8.2.6	The applicant, NCC and HE	<p>Archaeological mitigation</p> <p>The oAMS [REP3-056] at Section 11.8.5 refers to Stage 3: Mitigation measures. It sets out that mitigation measures which remove any potential further impact (preservation in situ), where practicable, will always be preferred. Where this is not possible, mitigating the loss of the archaeological resource through preservation by record will be proposed. On this point the ExA notes the conclusions of the SoS in recent solar DCO decisions that that preservation by record does not itself constitute acceptable mitigation.</p> <p>Rather, in situations where impacts on archaeological remains cannot be avoided, preservation by record is considered to be best practice. This reflects the NSP EN-1 guidance (para 5.9.18) that a documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted.</p> <p>a. The applicant is asked to consider the extent to which these principles are reflected in the oAMS, and to make any appropriate amendments.</p> <p>b. NCC and HE are invited to provide comment and advice on the approach to the management of the archaeological resource set out in the oAMS, in terms of both whether preservation by record is appropriately framed.</p>	<p>Preservation in situ is always the preferred method of mitigation, but where avoidance is not practical for the delivery of a consented scheme, preservation by record is usually considered acceptable, although not truly 'mitigation' as detailed in NSP EN-1 (para 5.9.18). In these circumstances, a weighing of the heritage asset in terms of its significance against the public benefit of the delivered scheme and any potential alternative options are considered as part of the mitigation strategy, including those assets which will absolutely require preservation <i>in situ</i>. In this case, provision has been made for this weighing exercise in section A11.8.5.2 following the completion of the post-consent archaeological investigation (Section A11.8.4) along with data from the work already completed prior to Examination.</p> <p>Ideally, data from the fully completed evaluation would have been presented during Examination so the weighing exercise could be completed in advance, or as part of a consenting decision, however it is noted that the SoS has recently consented comparable schemes offering the same or similar approaches as presented here.</p>
Q8.2.7	NCC	Heritage interpretation and community engagement	(a) The provision for public engagement is very much

		<p>The SoCG at 2.2.10 refers to NCC's position that community engagement in archaeological works and agree that this would enhance the public value and engagement with the historic environment [REP3-069]. The ExA notes that NPS EN1 refers at para 5.9.155 to applicants being encouraged to prepare proposals which can make a positive contribution to the historic environment, including where possible considering whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme. NCC sets out that provision should be made in the final AMS for lasting engagement during and after the archaeological work and post-construction through the operational lifetime of the scheme across multiple phases and using variety of public engagement techniques. NCC are asked to:</p> <ol style="list-style-type: none"> a. Noting the small addition to the oAMS [REP3-056] at A11.8.7.5.1, comment on whether any further detail, including the identification of other engagement / interpretation opportunities, could reasonably be expected at this point. b. Provide clarification on the suggestion at 2.2.10 of the SoCG that such provision would not offset the physical effects of the development but would provide a necessary public benefit from the archaeological work. Should this be regarded as best practice or would it be public benefit to be weighed in the heritage and wider planning balance? 	<p>welcomed, however until the post-consent archaeological work is undertaken it will be difficult to identify specific and appropriate opportunities to explore further, beyond those already mentioned in A11.8.7.5.1. However, provision has been made to develop this further once a better understanding of the archaeological resource has been established and we will work with the developer to ensure this is implemented.</p> <p>(b) This should be considered best practice. While it is certainly a public benefit, the ability to deliver public engagement should not form part of a weighing exercise associated with balancing the loss of a heritage asset in a planning context.</p>
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Q8.2.8	The applicant and NCC	<p>RAF Ossington Airfield</p> <p>The ExA has significant concerns about the lack of clear information regarding the nature and significance of RAF Ossington Airfield (the Airfield) as a non-designated heritage asset and, alongside this, the divergent positions of the applicant and NCC as set out in the SoCG [REP3-069] at line 2.2.8. The ExA therefore requests that the parties work together to provide a joint statement setting out:</p> <ol style="list-style-type: none"> a. The heritage significance of the Airfield. b. An assessment of the effects of the proposed development on this heritage significance, including setting c. A statement of how any direct and indirect effects could be mitigated <p>Where it is not possible to reach agreement on particular points, a clear statement of the parties respective positions, and the reasons for them, should be provided.</p>	<p>NCC has engaged further with the Applicant with respect to this issue. The Applicant has subsequently produced a Joint Statement and NCC has provided feedback. It is understood that the Joint Statement will be submitted by the Applicant at Deadline 4.</p>
9. Cumulative effects			
9.2.1	The applicant, NCC and NSDC	<p>Update on cumulative effects</p> <p>Noting the discussion at ISH1 [REP1-068] the applicant is asked to:</p> <ol style="list-style-type: none"> a. provide an update on the cumulative assessment, taking into account any newly proposed developments that may impact on the conclusions of the assessment of environmental effects. b. Working with NCC and NSDC, provide an update to the SoCG in terms of the agreed projects included. c. The parties are invited to provide comment on 	<p>Cumulative effects, particularly in relation to the Landscape and Visual Impact Assessment and impacts upon Best and Most Versatile Land, form part of the District Council's agreed remit for this proposal, therefore NCC defers to NSDC to respond to this question to avoid duplication.</p>

		whether the proposed H2East Pipeline, highlighted by several IPs at deadline 3 (for example [REP3-121]) should at this stage should be considered as part of the cumulative assessment	
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I trust that our responses assist the examination but please contact me should you have any queries.

Yours faithfully,

Will Lawrence MRTPI
Planning and Infrastructure Manager
Nottinghamshire County Council