



## **Great North Road Solar and Biodiversity Park**

Statement of Common Ground with Norwell Solar Steering Group

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## Revision History

Revision	Revision Date	Authorised By	Position	Comment
Issue 1	2/12/25	ES	Head of Planning	1 <sup>st</sup> draft for NSFSG review
Issue 2	9/12/25	PP	EIA Lead	2 <sup>nd</sup> draft for Deadline 1
Issue 3	23/12/25	PP	EIA Lead	3 <sup>rd</sup> draft for NSFSG review
Issue 4	15/01/26	PP	EIA Lead	4 <sup>th</sup> draft for NSFSG review
Issue 5	27/01/26	PP	EIA Lead	5 <sup>th</sup> draft for NSFSG review
Issue 6	02/02/26	PP	EIA Lead	6 <sup>th</sup> draft for NSFSG review
Issue 7	18/03/26	PP	EIA Lead	7 <sup>th</sup> draft for NSFSG review
Issue 8	19/03/2026	PP	EIA Lead	Final draft pre-signature

## **1 INTRODUCTION**

### **1.1 PURPOSE OF THIS DOCUMENT**

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

### **1.2 PARTIES TO THIS STATEMENT OF COMMON GROUND**

- 1.2.1 This SoCG has been prepared by (1) Elements Green Trent Limited as the Applicant and (2) Norwell Solar Farm Steering Group (collectively, 'the Parties').

### **1.3 TERMINOLOGY**

- 1.3.1 In the tables in the "Current Position" section (2) of this SoCG:
- "Agreed" (Green) indicates where the issue has been resolved;
  - "Under discussion" (Amber) indicates where a matter is the subject of ongoing discussion; and
  - "Not Agreed" (Red) indicates a final position.
- 1.3.2 Where Norwell Solar Farm Steering Group expresses agreement, it does so only in so far as it has considered the issue and on the basis of the information provided by the Applicant. Agreement is offered without prejudice to the submissions of other interested Parties who may have greater knowledge of technical or site-specific issues.

### **1.4 RECORD OF RELEVANT CORRESPONDENCE**

- 1.4.1 The Applicant has undertaken consultation and engagement with Norwell Solar Farm Steering Group at and following the statutory pre-application consultation process. This process afforded Norwell Solar Farm Steering Group the opportunity to provide responses to the information provided at the statutory consultation stage of the pre-application process.

1.4.2 Table 1-1 identifies the key meetings and consultation that has taken place between the Parties to date.

Table 1-1 Record of Correspondence

<b>Date</b>	<b>Type (meeting, etc.)</b>	<b>Topic</b>
09/12/2024	E-mail correspondence	Number of homes calculation by the Applicant
31/01/2025	Public consultation event, Carlton-on-Trent	Climate change assessment and the basis for the calculations of embodied carbon emissions and avoided carbon emissions savings
22/12/2025	Meeting	Greenhouse gas emission calculations
28/12/2025 – 30/01/2026	E-mail correspondence	Greenhouse gas emission calculations Number of homes calculations PVSyst model Replacement rates for BESS and solar PV

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

## 2 CURRENT POSITION OF THE APPLICANT AND NORWELL SOLAR FARM STEERING GROUP

### 2.1 PARAMETERS FOR ASSESSMENT

Table 2-2 Development Parameters for Assessment

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
2.1.1	Post-hearing submission	The export capacity of the grid connection	Is 800 MW (AC)	Agreed	Agreed
2.1.2	Post-hearing submission	The overplanting ratio (i.e., the sum of solar PV capacity (DC) divided by the grid export capacity)	Is 1.4	Agreed	Agreed
2.1.3	Post-hearing submission	The theoretical sum of capacity of the solar PV modules	Is 1,120 MWp (800 MW x 1.4)	Agreed if theoretical is added as in column 3.	Agreed
2.1.4	Post-hearing submission	Inclusion of BESS in proposals	The BESS is included in proposals, assumed in ES Chapter 15 to be 440 MW, 2-hour	It is agreed that the BESS is included in the proposals	Agreed
2.1.5		Inclusion of BESS in proposals	The Applicant believes the BESS is required for the project and that there is a demand for a BESS for grid support	The Group believe that that existing 52GWh of BESS under construction or with planning approval already far outweighs the national targets. Additionally, there are now 3 BESS under or awaiting construction in the local area alone, including one for the GNR project.	Not agreed

## 2.2 ILLUSTRATIVE ELECTRICITY GENERATION

Table 2-3 Illustrative Electricity Generation

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
2.2.1	Post-hearing submission	The principle of quoting a number of homes is illustrative of the generation capacity of the Development	The principle of quoting a number of homes is illustrative of the generation capacity of the Development as opposed to suggesting where the electricity will be used.	Agreed	Agreed
2.2.2	Post-hearing submission	Calculation of the number of homes equivalent of electricity that would be generated by the Development	The Applicant has stated that the figure is approximately 400,000 homes. The calculation of the energy production of the Development is not yet agreed between the parties. See Appendix 1 for the energy yield model parameters.	The Applicant has always maintained that in its best year, the arrays would produce 1,112,147MWh arrived at by using the combined MWp panel ratings. To arrive at 400,000 homes, this annual figure was divided by the out of date 2.7MWh figure. The Group have always challenged the relevance of this MWp STC total for real world calculation. However, if the MWp is used, then given the Applicant's own figures, the number of homes on average that could be powered would be 327,102.	Not agreed

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
				<p>The adoption of more up to date data sheds new light on the supposed public benefit of the development with the number of households on average that could be powered approaching half of what the Applicant states. It is strongly argued that more accuracy and a fairer comparison are achieved by using average domestic consumption as opposed to the TDCV middle range. The Group have now recalculated the best years generation adopting bifacial panels. In year 3 , this would be 846,445MWh, enough to power 248,954 homes.</p>	
2.2.3	Post-hearing submission	The average annual figure to be used for domestic electricity use in the calculation	2.7 MWh/y AC, this being the figure previously published by Ofgem.	The Group believe the 2025 Department for Energy Security and Net Zero (DESNZ) publication "Review of the average annual domestic gas and electricity consumption levels". Should be the correct source with average domestic consumption being 3.4MWh	Not agreed

## 2.3 GREENHOUSE GAS ANALYSIS

Table 2-4 Greenhouse Gas Analysis

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
2.3.1	Post-hearing submission	Use of the carbon intensity to be used as the baseline comparator for export of solar PV-generated electricity	<p>It is agreed that the use of the grid carbon intensity at the 2024 figure (as shown in Tables A15.1.20 and A15.1.4) <u>should not</u> be used to inform the conclusions of the assessment for solar PV as it is not worst-case, and that the long-run marginal carbon intensity for generation (as shown in Tables A15.1.19 and A15.1.5 of the <b>ES Volume 4, Appendix A15.1: Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1B]</b> <a href="#">[REP3-063]</a>) <u>should</u> be used to inform the assessment for solar PV.</p> <p>This is different to most previous solar DCO applications (e.g., Stonestreet, Tillbridge, Byers Gill, Gate</p>	<p>The Group's previous answer related to Table 15.1.21 as that was in the original comment from the Applicant but changed after our response. The Group agree that figures in Tables A15.1.20 and A.15.1.4 should not be used and also agree that the long run carbon intensity figures in Tables A15.1.19 and A15.1.5 should be used.</p>	Agreed

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
			Burton), which have used the CCGT carbon intensity as the baseline comparator, so the approach taken in the <b>ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15B] [REP3-026]</b> is a major departure from previous assessments. This was raised in the Secretary of State's decision letter on Gate Burton Solar Park (Planning Inspectorate project reference EN010131).		
2.3.2	Post-hearing submission	Method for apportioning electricity export from the solar panels to the BESS	For the purposes of assessing greenhouse gas emissions, the BESS is assumed to charge from 15% capacity to 100% capacity once each day, and then export that electricity to get back to 15%. That electrical energy is assumed to come out of the total generated by the solar PV modules. The remaining electrical energy generated	The Group do not agree that the BESS will only be charged once during any 24 hour period. The BESS charging figures in Table A15.1.19 point to there being a daily cycle throughout the year, discharging solar generated MWh's. The Group's belief is that there will also be a full morning cycle discharge from overnight charging on all but a handful of days. It agrees that there may initially be an emissions savings from	Not agreed

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
			by the solar PV modules is assumed to be discharged directly to the grid. This is a conservative approach; any import from the grid to the batteries would lead to additional carbon savings, because of the greater carbon intensity of the grid at times of peak demand compared to non-peak demand.	using overnight grid charged battery energy at morning peak but given the national BESS pipeline and the number of BESS ahead of GNR in the queue, there will quickly be less need for gas peaker generation. This is very difficult to calculate as the 2030 action plan for some reason sets targets in GW as opposed to GWh.	
2.3.3		Usage of the BESS	The BESS is expected to be used approximately 1.5 times per day on average ("1.5 cycles"). This would include charging both from the solar PV modules during the day, and from the grid at night.	Making certain assumptions on maintenance downtime, and adopting an 85% DoD, and the Applicant's annual charged to BESS figures the Group calculate that there has to approximately 680 cycles per annum with 330 sourced from solar generation. Reducing the number of cycles each year firstly reduces the arguments in favour of the BESS. Reducing the number of solar cycles makes it very difficult to reach the Applicant's estimates of MWh annual discharge totals.	Not agreed
2.3.4	Post-hearing submission	Uncertainty in the future baseline	The carbon intensity of electricity generation in the	Agreed.	Agreed

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
			<p>absence of the Development (that would be avoided by the operation of the Development), particularly from the batteries, is the largest element of uncertainty in the assessment of savings in greenhouse gas emissions.</p>		
2.3.5	Post-hearing submission	The baseline carbon emissions from electricity supplying future peak electricity demand periods	<p>In the absence of any official predictions of future grid peak-time carbon intensity, <b>ES Volume 2, Chapter 15: Climate Change</b>[EN010162/APP/6.2.15B] [REP3-026] and <b>ES Volume 4, Appendix A15.1: Lifecycle Greenhouse Gas Evaluation</b> [EN010162/APP/6.4.15.1B] [REP3-063] use displaced CCGT as the emission saving arising from export from the BESS, as this is what happens currently. Previous Secretary of State decisions for solar projects do not comment</p>	<p>NSFSG argue that this leads to unrealistically high carbon intensity over the 40 year operational period, and propose two alternative scenarios for decreasing carbon intensity at peak times over that period.</p> <p>The view of the Group is that the approach of using pegged carbon intensity is inconsistent with the judgement by Mr Justice Sullivan in 'Rochdale' and paragraph 4.2.12 of NPS EN-1.</p>	Not agreed

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
			on peak-time carbon intensity.		
2.3.6	Post-hearing submission	Calculations of the savings of emissions of greenhouse gases as set out in Table A15.1.19 of <b>ES Volume 4 – Technical Appendices Technical Appendix A15.1 – Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1] [APP-285]</b> ,	The following are the major items not yet agreed: Calculation of the energy production of the Development (as per 2.2.2). See Appendix 1. Operational life of key components of the Development: solar PV modules and batteries		Agreed
2.3.7	Post-hearing submission	Calculations of the embodied emissions of greenhouse gases as set out in ES Volume 4, Technical Appendices - Technical Appendix A15.1 - Lifecycle Greenhouse Gas Evaluation <b>[EN010162/APP/6.4.15.1B] [REP3-063]</b> – solar PV	The carbon emissions associated with the production of the solar PV modules is based on a peer-reviewed journal publication. The estimate of emissions associated with the production of the solar PV modules is appropriate for a conservative approach to the assessment.	The peer reviewed publication is now 10 years old and has been superseded by other publications. However, the quoted embodied emissions in ES TA A15 REP083 are not challenged. Other more recent data calculates the PV embodied carbon at a similar level if they are produced in China.	Agreed
2.3.8	Post-hearing	Calculations of the embod-	Carbon emissions associated with the production	The Group would accept that if	Not agreed

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
	submission	ired emissions of greenhouse gases as set out in ES Volume 4, Technical Appendices - Technical Appendix A15.1 - Lifecycle Greenhouse Gas Evaluation <b>[EN010162/APP/6.4.15.1B]</b> <a href="#">[REP3-063]</a> – component replacement	and transportation of replacement components, expected to be more than 15 years after the start of the Development's operational phase, may be substantially less than the emissions associated with the components used in the construction phase, due to global decarbonisation. The extent of this is not well predicted in literature, and hence the assessment in the ES assumes emissions for replacement (which represents c. 800 kteCO <sub>2</sub> e, i.e., c. 25% of the total embodied emissions) would be the same (per component) as at construction, which will be a substantial overestimate of emissions, but in the absence of more specific (and yet worst-case) data, has been used in the assessment.	global decarbonisation does actually take place then that will affect some production emissions. The major production emissions are in the supply chains abroad and China, from where the major transportation emissions also stem. Unlike UK decarbonisation reduced emissions modelling by the DESNZ, there is far less certainty about how this will move globally or in the foreign supply chains. There is significant doubt about the anticipated progress in decarbonisation in developing countries which source many of the raw materials required for this project. The Group agree that in the absence of any reliable data, embodied carbon figures used might be a worse case but it is impossible to tell. This course of action would be 'Rochdale compliant'.	

Ref	Relevant Documents	Description of Matter	Applicant's Position	Norwell Solar Farm Steering Group's Position	Status
2.3.9	Post-hearing submission	Calculations of the embodied emissions of greenhouse gases as set out in ES Volume 4, Technical Appendices - Technical Appendix A15.1 - Lifecycle Greenhouse Gas Evaluation <b>[EN010162/APP/6.4.15.1B]</b> <a href="#">[REP3-063]</a> – all parameters except electrical energy production, emissions savings from operation of the BESS, and component replacement rates	The assessment of emissions from other parameters (i.e., excluding those listed in 2.3.5, above) is agreed as being appropriate for the assessment of effects of the Development on climate change.	Save for the parameters in column three, the GHG emissions as listed in REP-063 are now agreed.	Agreed

## 2.4 APPLICANT'S SUMMARY OF THE POSITION AS AT 18<sup>TH</sup> MARCH 2026

- 2.4.1 As set out within **ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15B] [REP3-026]**, a Lifecycle GHG Evaluation has been undertaken based on the information available at the time of assessment. The Evaluation draws on appropriate industry benchmarks and 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.
- 2.4.2 The trajectory towards net zero by 2050 will inevitably influence the eventual carbon intensity of grid electricity, transport, construction practices and other factors. These future changes cannot be predicted with precision and become increasingly uncertain over longer timescales. The assessment therefore reflects the information reasonably available now, consistent with the requirements of the EIA Regulations.
- 2.4.3 The approach set out in **ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15B] [REP3-026]** is further supported by **ES Volume 4, Appendix A15.1: Lifecycle Greenhouse Gas Evaluation [EN010162/APP/6.4.15.1B] [REP3-063]**. As with all EIAs, the assessment identifies the likely significant effects rather than attempting to define absolute outcomes. The use of reasonable, transparent, and clearly defined assumptions is necessary to undertake such evaluations.
- 2.4.4 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, principally around the embodied carbon emissions. In the Applicant's view, agreement on the remaining points is now unlikely, as the outstanding issues concern the extent to which solar should be regarded as low carbon, and the exact generation assumptions that can be stated with certainty at this stage.
- 2.4.5 It remains the Applicant's position that these outstanding matters would result in, at most, only a marginal reduction in the carbon savings reported in paragraphs 73–74 of **ES Volume 2, Chapter 15: Climate Change [EN010162/APP/6.2.15B] [REP3-026]**, which conclude that the Development delivers a major beneficial significant effect.
- 2.4.6 The outstanding issues raised by NSFSG can be summarised as follows:
- NSFSG consider that the carbon savings presented in the ES may be overstated and request more detailed assumptions and supporting evidence.
  - NSFSG dispute the energy generation figures and have requested that these be recalculated using an alternative methodology, which would reduce the illustrative estimate of the number of homes the Development could supply.

- 2.4.7 The Applicant has sought to address these concerns constructively. However, the level of information now being requested goes beyond what is considered necessary or reasonable in the context of an NSIP application. EN 1 is explicit in its support for solar energy, stating that “wind and solar are the lowest cost ways of generating electricity... providing a clean and secure source of electricity supply” and that a net zero consistent system in 2050 “is likely to be composed predominantly of wind and solar” (§3.3.23).
- 2.4.8 EN 1 also establishes the requirements for assessing GHG emissions. Paragraph 5.3.8 states that the Secretary of State must be satisfied that the applicant has assessed the GHG emissions of all stages of the development as far as possible. The Applicant’s assessment provides an appropriate and proportionate level of detail to meet this test.
- 2.4.9 The Development benefits from clear, up to date and authoritative policy support. National policy identifies an urgent need for new low carbon generation and highlights solar as a key component of the UK’s strategy for cost effective decarbonisation. The Development is also fully consistent with the National Planning Policy Framework and other relevant planning policies.
- 2.4.10 NPS EN 1 further designates low carbon infrastructure, including renewable electricity generation, as a Critical National Priority (CNP). This confers a strengthened basis for policy support, given the urgent national need for such infrastructure and the legal obligation to achieve net zero.
- 2.4.11 There is no ambiguity in national policy: solar energy is a low carbon technology and plays an essential role in meeting legally binding carbon budgets. 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.

## **2.5 NSFSG’S POSITION AS AT 19<sup>TH</sup> MARCH 2026**

- 2.5.1 The Group’s position is that the arguments advanced in their submissions have not changed. Whilst accepting the project will deliver renewable energy, that energy would not be low carbon. There is no intention to repeat the points made in earlier tendered submissions. However, now that outline plans for the hydrogen pipeline from the East Coast to Newark have been published, there is even more doubt over the Applicant’s estimates for emission savings over the next 40 years. Finally, the Group do not accept the supposed commercial sensitivity argument for not publishing the original date stamped Pvsyst report from 2023/2024, showing 740Wp bifacial panels as the Applicant could simply black out the manufacturer’s name.



### 3 SIGNATURES

3.1.1 The above SoCG is agreed between the Applicant and Norwell Solar Farm Steering Group, as specified below.

---

Duly authorised for and on behalf of <b>Elements Green Trent Lim- ited</b>	Name
	Job Title
	Date
	Signature

---

Duly authorised for and on behalf of <b>Norwell Solar Farm Steering Group</b>	Name
	Position
	Date
	Signature

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## 4 APPENDIX 1: ENERGY YIELD MODEL PARAMETERS

### 4.1 INTRODUCTION

4.1.1 This appendix summarises the key parameter values in the PVSyst model for the Great North Road Solar and Biodiversity Park (the Development) used by the Applicant to inform the assumptions made in the Environmental Statement (ES) **Volume 2, Chapter 15: Climate Change** [EN010162/APP/6.2.15] [APP-058].

### 4.2 SCOPE AND CONTENT

4.2.1 The Applicant has several PVSyst models that are used for internal verification purposes. There is no single, fixed model for the Development, because the design isn't fixed at this pre-consent stage. The full model is not provided; it is commercially confidential, as it references specific components and the publication of this could prejudice subsequent procurement processes to the commercial detriment of the Applicant.

4.2.2 The parameters presented in this appendix are the principal determinants of the electrical energy yield as referred to in **Volume 2, Chapter 15: Climate Change** [EN010162/APP/6.2.15] [APP-058] and in **ES Volume 4, Appendix 15.1: Lifecycle Greenhouse Gas Evaluation** [EN010162/APP/6.4.15.1] [APP-285]. The parameter values presented in this document are consistent across the Applicant's models, with only minor variations in response to alternative PV module choices, etc.

### 4.3 PARAMETER VALUES

4.3.1 Key parameters and their values are set out in Table 4-1.

Table 4-1 Greenhouse Gas Analysis

Parameter	Value
Latitude	53.15°(N)
Longitude	-0.88°(W)
Altitude	16 m
Weather data	Norwell Woodhouse PVGIS api TMY
Grid connected system	Unlimited sheds
Tilt	20°
Azimuth	0°
<b>PV Array</b>	
Nb. of modules	1,513,512 units
Pnom total	1,120 MWp
<b>Inverters</b>	

<b>Parameter</b>	<b>Value</b>
Nb. of units	117 units
Total power	804,258 kWac
Grid power limit (limit applied at the inverter level)	800.0 MWac
Grid lim. Pnom ratio	1.4
Perf. Ratio PR	87.80%
Bifacial perf. ratio	84.64%
<b>Bifacial model geometry</b>	
Sheds spacing	8.00 m
Sheds width	4.74m
Limit profile angle	24.4°
GCR Bifacial	59.20%
Height above ground	0.8 m
<b>Bifacial model definitions</b>	
Ground albedo	0.2
Bifaciality factor	85%
Rear shading factor	5%
Rear mismatch loss	10%
Shed transparent fraction	0%
<b>System Production</b>	
Produced Energy (P50)	1140.0 GWh/year
Specific production (P50)	1018 kWh/kWp/year
Perf. Ratio PR	87.80%