

Great North Road Solar and Biodiversity Park - Project EN010162

JPAG - Interested Party Reference [REDACTED]

Response to Second Set of Questions from Examining Authority

JPAG sets out below comments in response to six questions posed by the Examining Authority, namely:

- Q8.2.8 Ossington Airfield
- Q9.2.1 Cumulative Effects
- Q9.2.2 Cumulative Assessment
- Q11.2.3 Landscape Viewpoints
- Q11.2.5 Regional Landscape Change
- Q11.2.7 Character of the Regional Landscape

Q8.2.8 RAF Ossington Airfield

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:

a. The heritage significance of the Airfield. This should include:

- i. an assessment its heritage values*
- ii. clarity on the nature and locations of the elements contributing to significance*
- iii. consideration of where further information is required to clarify the nature and contribution of particular elements, and whether/ how it this can be obtained*
- iv. consideration of the extent of the setting 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

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

JPAG supports the position of Nottinghamshire County Council and the local community that Ossington Airfield is a significant heritage asset that has not been properly assessed or considered through the process by the applicant.

The airfield has heritage significance in terms of the building remains, the overall structure of the airfield outline and its setting particularly in relation to Ossington village as an estate village. Its position on the hill gives it added prominence from the Laxton historic landscape, the South Field of which faces directly across the valley to the airfield.

JPAG shares the concerns of Nottinghamshire County Council that the RAF Ossington and the associated built remains (including the Battle HQ, runways, Nissen Huts etc) are impacted both directly and as a consequence of significant changes to their setting. The airfield clearly meets the criteria of being a non-designated heritage asset.

As we identified at ISH3 the operational requirements of the airfield have left the legacy of a large open area with no obstructions; together with the extensive runway system which makes intensive farming impossible. This has created a landscape which is fundamentally dependent on its history.

The development would result in substantial harm (in NPPF terms) to the significance of the WWII airfield. We note that the HER entries for this site are presently undergoing review and enhancement as a result of recently discovered information. The site inspection contribution to the scoping exercise undertaken by the applicant and subsequent investigations have to date been insufficient to fully appreciate the significance of the airfield remains

It is proposed to place the solar panels across much of the northern half of the airfield, this would disrupt the ability to understand and experience the airfield as a large verdant open and undeveloped area. Thereby removing one of the fundamental aspects that makes the airfield demonstrably special.

Also, the are proposed to be developed is where the land is roughest and where many areas are left uncultivated or lay as permanent grassland. It is also nearest the Laxton Sykes SSSI and baulks and the Ancient Woodland of North Wood. This is the area most favoured by walkers because of the distance from the road, the amazing views across the Trent valley and the feeling of peace and serenity.

As identified previously, although the airfield is in private ownership, the landowner has never taken any steps to prevent public access which has taken place with the full knowledge of the owner. This permissive access makes the heritage contribution of the airfield even greater.

The only way through which direct and indirect impacts could be mitigated would be through removal of parcels W4, N11, N12.1, N12.2, N12.3 and N12.4 from the development.

Q9.2.1 Update on Cumulative Effects

Noting the discussion at ISH1 [REP1-068] the applicant is asked to:

- 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 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.

For the first time the Planning Inspectorate have introduced a map¹ to find national infrastructure projects. This helps demonstrate the concentration of NSIP projects in the northern part of the East Midlands Region and the southern part of the Yorkshire and Humber Region. This demonstrates the need to consider both cumulative effects and concentration of projects in this regional context.



Map of National Infrastructure Projects on Planning Inspectorate Website

¹ <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects-map>

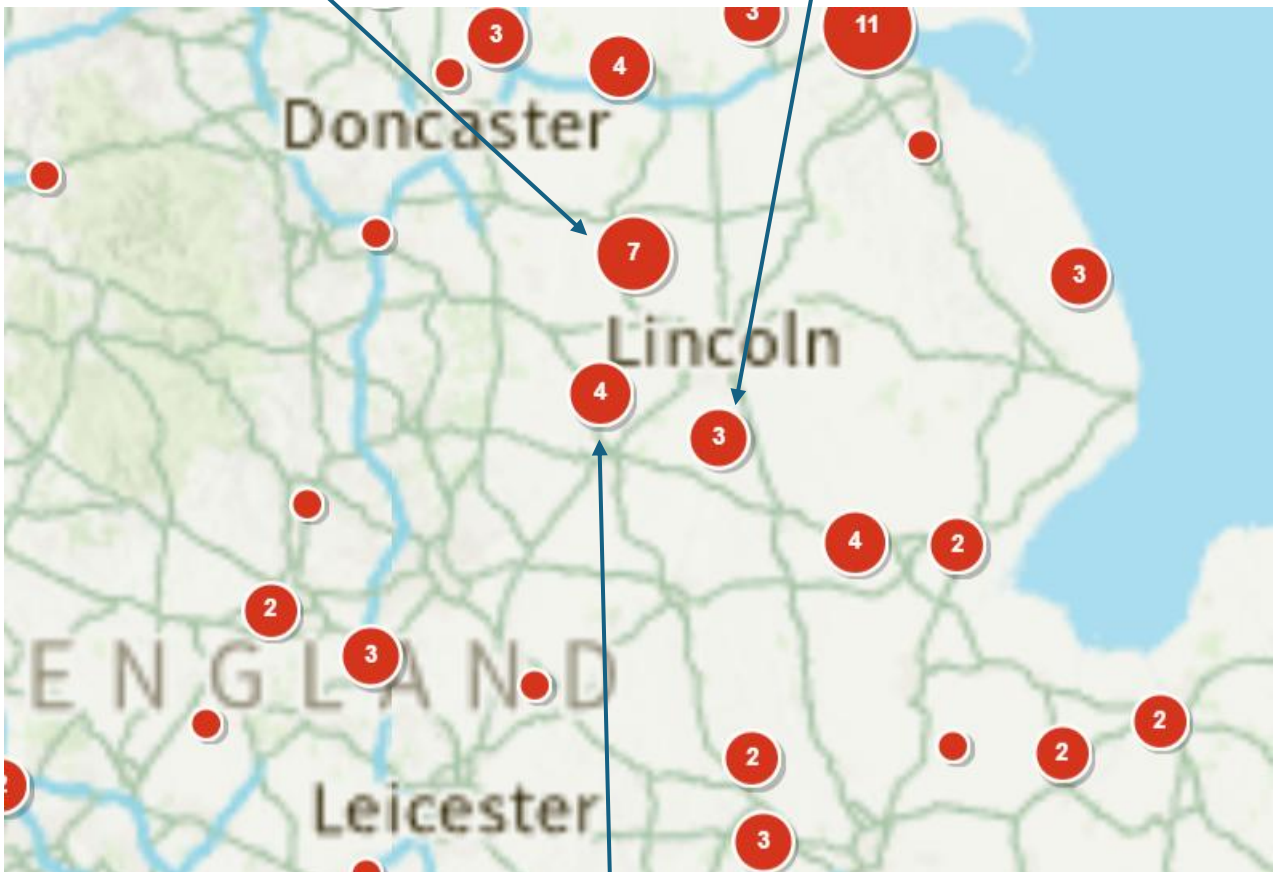
In addition to the NSIP projects, there are other national infrastructure projects in the area being pursued through other statutory processes, such as s38 of the Electricity Act; together with local projects.

7 projects selected

Cottam Solar Project	Post-decision
Tillbridge Solar Project	Post-decision
West Burton Solar Project	Post-decision
STEP Fusion	Pre-application
Gate Burton Energy Park	Post-decision
Steeple Renewables Project	Examination
West Burton C power station	Post-decision

3 projects selected

Leoda Solar Farm	Pre-application
Springwell Solar Farm	Decision
Fosse Green Energy	Examination



4 projects selected

Great North Road Solar and Biodiversity Park	Examination
H2East Pipeline: Humber to Nottinghamshire	Pre-application
One Earth Solar Farm	Recommendation
A46 Newark Bypass	Post-decision

Electricity Transmission Lines

The West Burton to Ratcliffe-on-Soar Refurbishment Project includes land within the GNR Order Limits.



Map from NGET

JPAG is aware from the publication of statutory notices that on 12 February 2026 National Grid Electricity Transmission plc (NGET) made The National Grid Electricity Transmission (West Burton to Ratcliffe-on-Soar Refurbishment Project) Compulsory Purchase Order 2026 to enable it to compulsorily acquire the land and land rights necessary to refurbish infrastructure between West Burton, High Marnham, Stoke Bardolph and Ratcliffe-on-Soar².

As highlighted in As-079 JPAG note from an examination of the maps that the NGET made CPO involves land within the GNR Order Limits, with the NGET looking to compulsory purchase land and/or compulsory acquire land rights on the same land that GNR are looking to do the same. The overlap seems to involve two main parcels of solar panels N4/N8/N9 and S7/S8, as well as cable corridors and access routes in the GNR Order Limits.

The NGET CPO appears to include not just land under their overhead line but also additional land for accesses and other operational purposes. Whilst NGET appears to be listed in the Book of Reference for land parcels where their overhead line runs, a cursory look shows that they do not seem to be listed as a relevant category 1 or category 2 party in the Book of Reference in relation to all the land parcels that their CPO covers.

We are not experts on the compulsory purchase/compulsory acquisition processes, but it seems rather unusual that two Orders are proposed in relation to the same parcels of land. We appreciate that the draft DCO contains protective provisions for NGET in Part 8 of Schedule 13, but we are unclear as to whether this sufficiently addresses the interaction and overlap between the made NGET CPO and the draft DCO in relation to competing rights.

This project adds to the cumulative impact, particularly in relation to construction impacts relating to traffic.

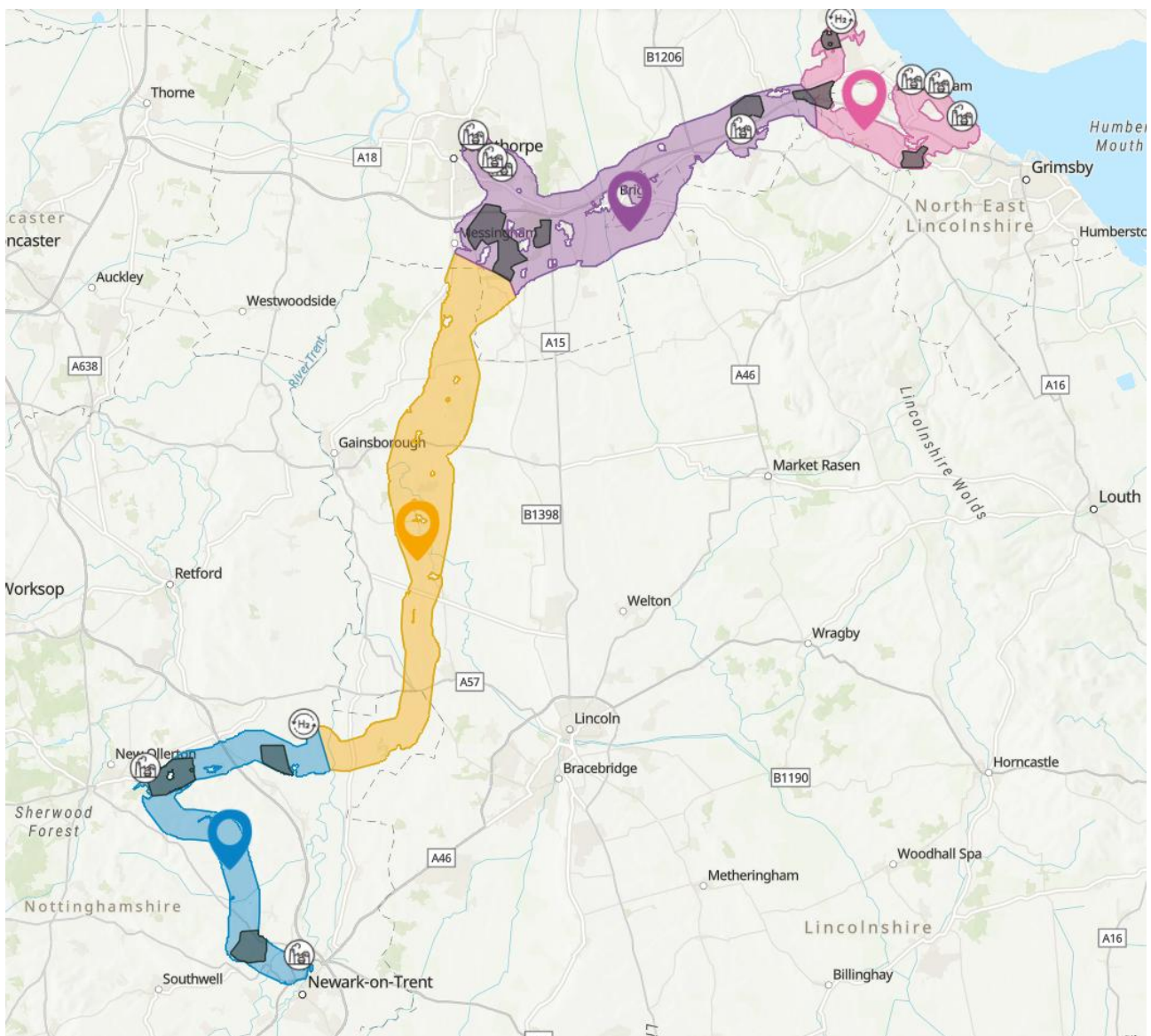
We are mindful that as far as we can ascertain there has been no discussion of this NGET project as part of the cumulative impact or cumulative effects, because there had been no public consultation or publicity regarding the West Burton to Ratcliffe-on-Soar Refurbishment Project. Construction on the relevant sections of the NGET project seem to be planned for 2027 and 2028 which would appear to overlap in planned construction timetable with GNR.

² A copy of the CPO, accompanying maps and statement of reasons is available on the National Grid project website at: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/west-burton-to-ratcliffe-on-soar>

There has been public consultation and publicity on the NGET Brinsworth to High Marnham grid upgrade which will also run through the GNR Order Limits in relation to the parcel of solar panels N1. However, the Brinsworth to High Marnham project is currently awaiting planning permission for three new substations which need to be constructed before the overhead line itself can be upgraded from 275kV to 400kV. As such there is no timetable yet for the NGET CPO for the Brinsworth to High Marnham grid upgrade.

H2 East Pipeline

On the 3 March 2026 early consultation on another NSIP scheme opened, this is the H2 East Hydrogen Pipeline³. This is intended to run from Humber to Nottinghamshire, or more precisely from Immingham/Killingholme to Newark.



Map of H2 East Pipeline

³ <https://h2east.co.uk/>

The Secretary of State issued a section 35 direction on the same day making this project an NSIP scheme.

The route of the proposed pipeline in its Nottinghamshire stretch will run through the south of Bassetlaw and through much of Newark and Sherwood. Section C runs from West Lindsey through the north-east corner of Newark and Sherwood before crossing the River Trent in the South Clifton to High Marnham area. Section D of the pipeline connects the HyMarnham Hydrogen Production Plant (at the former High Marnham Power Station site) to potential hydrogen industrial users at Kirton (Forterra at the Kirton Brickworks) and Newark (British Sugar at the Sugar Factory).

The preferred route corridor is proposed to extend westwards from High Marnham, passing to the north of Normanton on Trent and Egmanton with a Hydrogen Above Ground Installation (HAGI) required to provide a pipeline spur to the Forterra site at Kirton. From this location the main pipeline preferred route corridor heads in a south easterly direction passing between Caunton and Norwell to connect to a HAGI located to the northwest of Newark. From here a pipeline spur could connect to British Sugar. HAGIs would also be required within the two industrial user sites.

The proposed route would appear to impact on the following 25 Nottinghamshire Parishes:

- Thorney, Harby, Wigsley, North Clifton, South Clifton, Spalford, Girton, Marnham, Normanton on Trent, Weston, Tuxford, Egmanton, Kirton, Wellow, Laxton and Moorhouse, Ompton, Kneesall, Ossington, Norwell and Norwell Woodhouse, Caunton, Bathley, South Muskham, Kelham, Averham, and Newark.

HAGIs are proposed to potentially impact on the following Nottinghamshire Parishes:

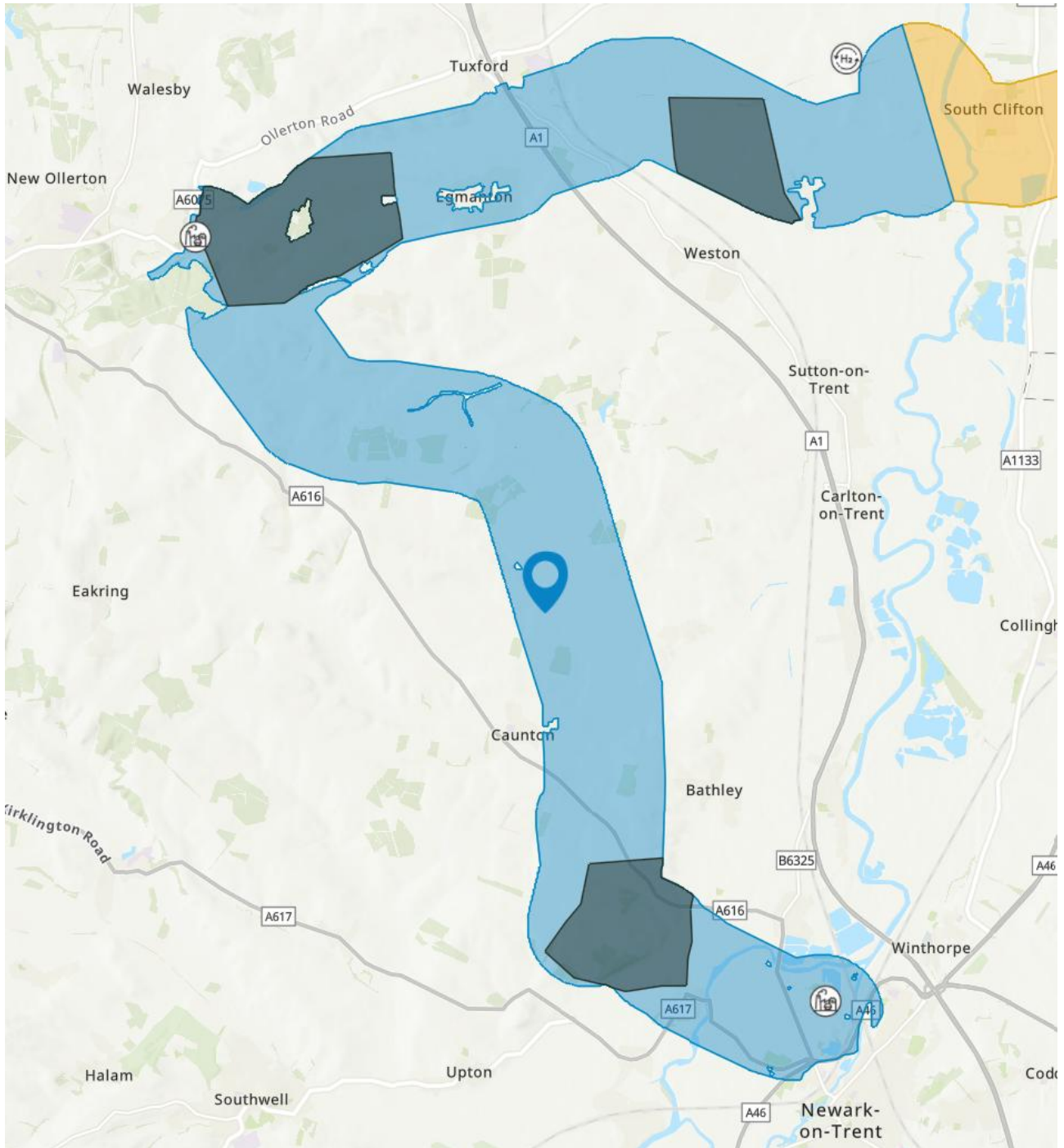
- Averham, Kelham, South Muskham
- Egmanton, Kirton, Wellow, Laxton and Moorhouse, Ompton
- Marnham, Normanton on Trent, Weston

(Note - the parishes highlighted in red are also impacted by GNR Solar)

Many of these Parishes are impacted by One Earth Solar or GNR Solar as well as other solar/BESS schemes. From looking at the plans, JPAG has identified that the H2 East pipeline does seem in parts to want to use the same land as GNR, namely need for a crossing point around Ossington Airfield and in the Averham, Kelham and South Muskham area. There is also possibly some conflict with the Kelham Solar and possibly the edges of Knapthorpe and Muskham Grange solar schemes,

with potential conflict with the existing Egmanon solar and the permitted Tuxford Road Solar and the proposed One Earth solar project.

The first stage of consultation is now open and will run from midday on 3 March 2026 until 23:59 on 14 April 2026.



Map of H2 East Pipeline

The H2 East Pipeline corridor has been added to the cumulative impact maps that JPAG has produced, the latest version of these maps is submitted alongside these answers to the second set of questions.

Norwell Foxholes Grid Connection

A recent court case⁴ has considered the position of a renewable energy proposal and the resultant need for a grid connection. The Scottish Court of Session in a judgement on the 17 February 2026 has considered the question of whether the construction of a wind farm and its grid connection constitute a single project for the purpose of assessing environmental impact. The Court quashed a decision to grant consent for a wind farm over the failure to properly assess whether turbines and grid connection constituted a single project.

Although that was a Scottish case, it has UK wide relevance because although the respective constituent parts of the UK have separate EIA Regulations, the respective Regulations are based on a common approach that arose from an EU Directive.

The proposed grid connection for the Norwell Foxholes solar project has been recently added to the consultation underway on that planning application which is still pending determination. That connection is to be the SSE BESS scheme at Staythorpe. It is relevant for the Examining Authority to note that SSE are the company that control the SSE BESS scheme, Knapthorpe Solar, Muskham Wood Solar and Norwell Foxholes Solar. So, in reality these four schemes form a single project located within the middle of the GNR solar project.

The Grid Connection route for the Foxholes Solar project has been added to the cumulative impact maps that JPAG has produced, the latest version of these maps is submitted alongside these answers to the second set of questions.

Staythorpe Power Station Carbon Capture and Storage

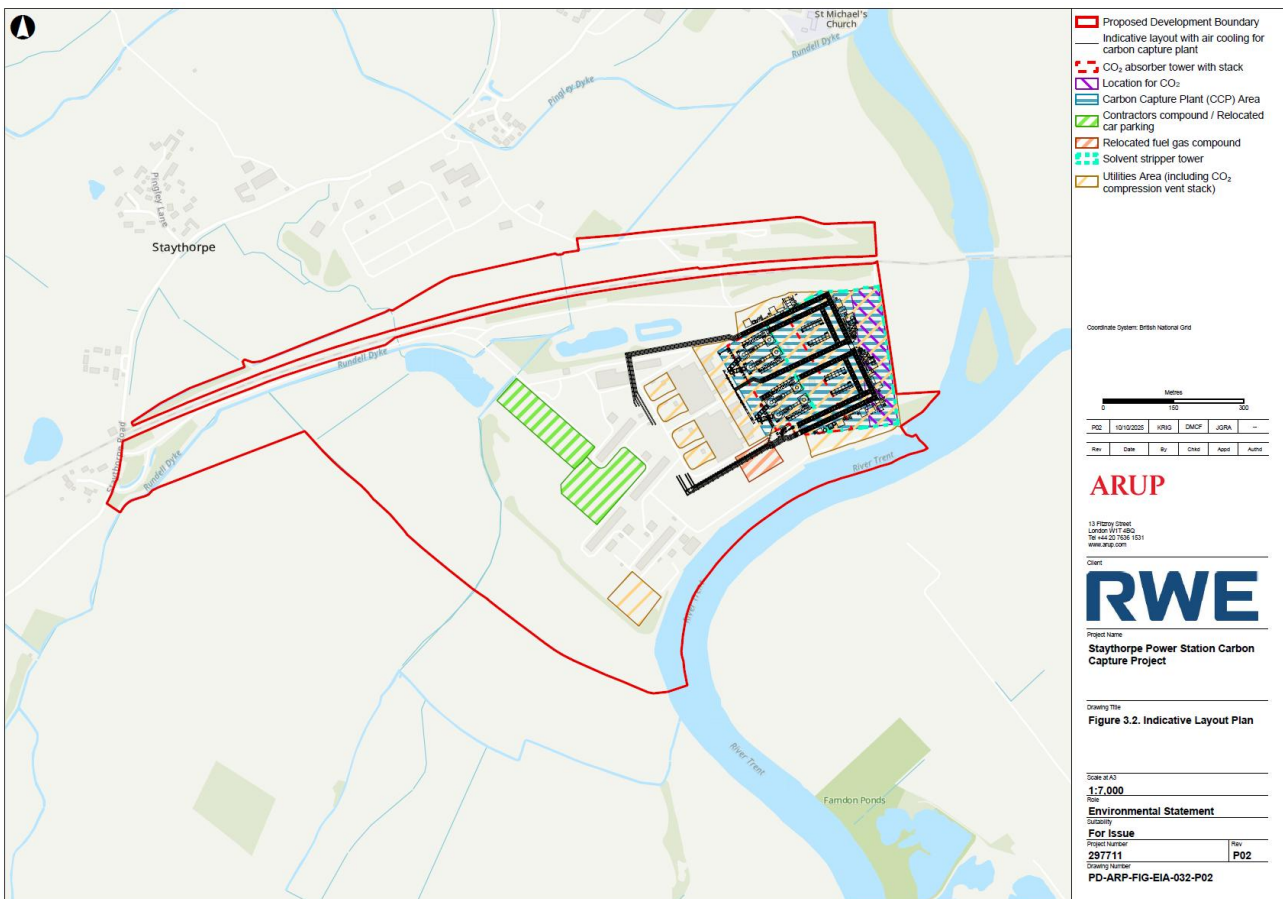
RWE on the 24 February 2026 submitted the application to vary the existing Section 36 consent at Staythorpe Power Station, proposing the installation of state-of-the-art carbon capture technology. The Section 36 process involves several stages:

1. RWE submits an initial application to DESNZ (Department for Energy, Security and Net Zero)
2. DESNZ will consider if the application is suitable for publication.

⁴ Raeshaw Farms Ltd v Scottish Ministers & Energiekonitor UK Ltd [2026]

3. RWE will publish the application on its website, advertise it and send it to all relevant stakeholders and the local planning authority.
4. The deadline for representations will generally be 28 days after publication of the last notice.
5. The relevant planning authority is given 2 months after service of the variation application documents to comment.
6. Before determining a variation application, the Secretary of State may cause a discretionary public inquiry to be held.
7. A decision will then be made by the Secretary of State to approve the variation.

The section 36 consent process doesn't include the pipeline connection required to connect the carbon capture plant to the Viking CCS store in the Humber, which will need a DCO process of its own. So, that will be another future project if the CCS plant itself gets approved.

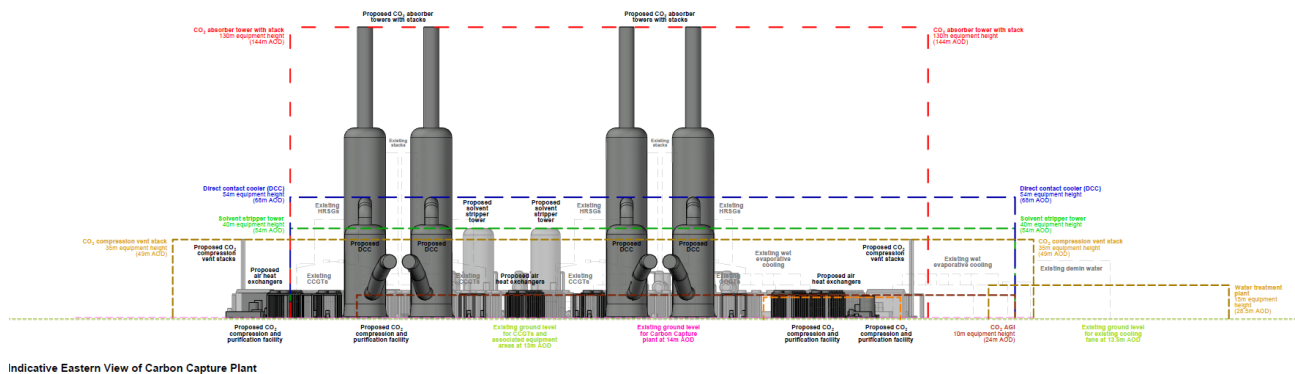


Staythorpe CCS Proposed Layout

The reason the carbon capture plant follows the section 36 consent process is because the power station operates under that regime already; so, any variation has to go through that old style process and not the newer NSIP/DCO process.

The Staythorpe CCS was already on our original set of cumulative impact maps, it is retained on the cumulative impact maps that JPAG has produced, the latest version of these maps is submitted alongside these answers to the second set of questions

Following submission of the s36 variation, consultation on the CCS plant is undertaken. We don't have a timetable for this but as the SoS is expected to make a decision in 2027, meaning presumably consultation will be some time in 2026.



Indicative Plan of Staythorpe CCS Plant

Q9.2.2 Cumulative Assessment

The ExA notes that a number of interested parties have raised concerns about the applicant's approach to the cumulative assessment of this project with other solar and infrastructure developments that are either existing, in the pipeline or are proposed. Interested parties are invited to make further comment on whether the applicants assessment is consistent with the Planning Inspectorates advice on Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment.

This advice is non-statutory. However, the Planning Inspectorate's advice about running the infrastructure planning regime and matters of process is drawn from good practice and applicants and others, it suggests that proposals should follow the advice recommendations. It is intended to complement the legislation, regulations and guidance issued by government and is produced under section 51 of the Planning Act.

The advice states:

“NSIPs often have a broad spatial and temporal zone of influence (ZOI). The scale and complexity of an NSIP may result in a complex cumulative effects assessment process that considers a dynamic baseline environment going beyond a static assessment of the current situation. There may be variation in the approach to identifying and assessing ‘existing and, or approved development’.

This advice suggests 4 stages to CEA:

- *establishing the long list (stage 1)*
- *establishing the short list (stage 2)*
- *information gathering (stage 3)*
- *assessment (stage 4)”*

The Environmental Statement Volume 4 - Technical Appendices Technical Appendix A2.1 - Cumulative Assessment Stages 1 and 2 is now up to version 3 (REP2-042). It is accepted that the methodology used broadly follows the Planning Inspectorate guidance. However, the concerns of JPAG relate to the long list of projects considered as part of establishing the long and short lists in the first place at stages 1 and 2; as well as the selection of projects then progressing to stages 3 and 4 for further assessment.

In devising the shortlist, the project has failed to take sufficient attention to the advice that states:

“Consideration of effects that are deemed individually not to be significant should still be included in the assessment, as the cumulative effect of several non-significant effects could be significant.”

Also, as we have identified previously the circular nature of the project gives this project the unusual factor of encircling a large area including many settlements. JPAG has described the project as a doughnut, out of which a bite has been taken when the proposal was altered in the Muskham area. As suggested previously we consider that the zones of influence should have only been applied to the outer nature of the circle and all of the area within the circle should have been included in the assessment process.

The advice also states:

“Assigning certainty to other existing and, or approved development

Tier 1 - Other existing and, or approved development

- *under construction*
- *permitted applications under the Planning Act or other regimes but not yet implemented*
- *submitted applications under the Planning Acts or other regimes but not yet determined*
- *all refusals subject to appeal procedures not yet determined*

Tier 2 - Other existing and, or approved development

- *projects on the Planning Inspectorate’s programme of projects*

Tier 3 - Other existing and, or approved development

- *projects on the Planning Inspectorate’s programme of projects where a scoping report has not been submitted*
- *identified in the relevant Development Plan and emerging Development Plans, with appropriate weight given as they near adoption, recognising that there will be limited information available on the relevant proposals*
- *identified in other plans and programmes, as appropriate, which set the framework for future development consents or approvals, where such development is reasonably likely to come forward*

A decreasing level of detail is likely to be available from Tier 1 to Tier 3.”

Where other existing and, or approved developments are expected to be completed before construction of the proposed NSIP and the effects are fully determined, effects arising from them should be considered as part of the baseline and may be considered as part of both the construction and operational assessment. Insufficient attention has been paid to existing development in the baseline analysis, and the impact of overlapping construction and operational impacts have not been fully considered.

Whilst the difficulty in undertaking cumulative assessment in the context of a plethora of other projects moving forward on different timetables is understood. Nevertheless, the ExA and the Secretary of State will have to have full regard to the latest position on projects at the time of making the recommendation and decision as appropriate.

The Planning Inspectorate advice is also clear that whilst there may be an assessment cut-off date, where new other existing and, or approved development comes forward following the cut-off date, the Examining Authority may request additional information during the examination in relation to effects arising. It also advises that the applicant may need to conduct additional assessments to reduce delays and questions during examination.

As the West Burton to Ratcliffe-on-Soar Refurbishment Project and H2 East Pipeline specially include land within the Order Limits, it is considered imperative that the cumulative assessment must include these. The overhead line project is a Tier 1 approved scheme, and the H2 East Pipeline is a Tier 3 project.

The need to consider cumulative effects in planning and decision making is also set out in planning policy, particularly the National Policy Statements. The overarching National Policy Statement for energy (EN-1), for example, specifies a range of aspects for which the applicant’s assessment in

the Environmental Statement should consider cumulative impacts, as relevant to the development.

It should also be borne in mind that the advice is primarily intended to address the consideration of cumulative effects in terms of issues that need to be addressed by EIA. It does not specifically deal with the allied issue of clustering and concentration which are also relevant policy issues to be considered as part of the decision-making process.

Existing development that has not been assessed at stages 3 and 4 include:

- The existing Staythorpe Power Station
- Southwell Racecourse
- Newark Sugar Factory

In our Relevant Representation (RR-101) in Appendix 1 we set out the full list of projects that we considered should have been assessed.

The cumulative assessment has also failed to take account of proposals which are clearly part of the same project, such as the relevant grid connection or connected BESS scheme. A recent court case⁵ has considered the position of a renewable energy proposal and the resultant need for a grid connection to be considered as an integral part of one overall project for EIA purposes. The cumulative assessment done to date conflicts with this case law position in relation to:

- Winkburn Solar grid connection
- Winkburn BESS
- Foxholes Solar grid connection

The cumulative assessment is also highly inconsistent in what it includes, for example including housing development in Mansfield (for example ID 193) for socio economic effects. However, almost none of the major housing underway around Newark and Sherwood has been included. For example:

- Newark South is under construction for over 3,000 dwellings but has not been assessed.
- Neither have all the schemes in the land around Fernwood for another 3,000 dwellings which are also under construction.
- In the same way the Newark Southern Relief Road which is part of Newark South and is under construction hasn't been assessed.
- Thoresby Vale which is a large new village under construction on the eastern side of Edwinstowe has not been assessed.

⁵ Raeshaw Farms Ltd v Scottish Ministers & Energiekonitor UK Ltd [2026]

The cumulative assessment has been undertaken without the benefit of actually having local knowledge as to what is actually underway in the area. Given the fundamental nature of the inconsistencies over what has and hasn't been included in the cumulative assessment, it lacks rigour and does not represent cogent or substantive evidence. JPAG considers the entire cumulative assessment process to be so fatally flawed that it can in no way be relied upon.

Q11.2.3 Use of summer photograph in viewpoints

The photographs for the representative viewpoints were taken in July 2025. They therefore do not take into account the winter months when the trees are bare of leaves. In this sense IPs have is suggested that the full impact of the proposals has not been considered.

Noting that it is usual to provide 'summer' and 'winter' views in landscape and visual assessments, the applicant is invited to address this point. Specifically, can the applicant confirm that reasonable worst case landscape and visual impacts have been assessed.

The ExA would have had the benefit of undertaking their recent site inspections during the winter season. Accordingly, the ExA will have seen that during the winter season many of the existing hedgerows and trees provide no mitigation.

It is the understanding of JPAG that according to paragraph 6.28 of GLVIA 3, using both summer and winter viewpoints is important for a comprehensive Landscape and Visual Impact Assessment (LVIA), especially for complex or sensitive sites. Winter, or 'leaf-off' views represent the 'worst-case scenario' for screening, while summer views show maximum vegetation filtering. Such a dual approach accurately assesses changing visibility throughout the year.

This project has had a gestation period that has been more than sufficient to have had time to undertake both summer and winter photographs for the LVIA.

Q11.2.5 The assessment of regional landscape change

NSDC has set out in its local impact report [REP1-075] and in a Technical Memorandum following ISH3 [REP3-107] that, whilst it follows guidance, the approach utilised within the applicant's landscape and visual impact assessment (LVIA) of isolating landscape character areas and not fully considering sequential views of multiple schemes, underplays the progressive landscape change occurring across the region, and does not adequately capture how multiple schemes collectively influence the perceived character, openness and rural qualities of the Trent Valley landscape.

In response the applicant has produced a further Cumulative LVIA Technical Note 2 at Appendix A of the written summary of ISH3 [REP3-101].

Noting that it is an agreed matter that the applicant has that the cumulative assessment provided within the LVIA meets the relevant guidance [REP3-071], NSDC is asked to please:

a. Provide comments on the applicants Technical Note 2, in terms of whether their concerns regarding the cumulative assessment of landscape and visual effects have been addressed in relation to:

i. The inclusion of consented projects in the assessment baseline;

ii. Consideration of sequential effects on local road and public right of way (PRoW) users between Moorhouse and Skegby given the close proximity of the proposed development, Egmanton Solar Farm, Tuxford Road Solar Farm and One Earth solar Farm in that area;

iii. Cumulative effects on the wider regional landscape

b. Following from question a iii., if NSDC's concerns have not been addressed, provide further clarification of its conclusion that the strategic level effects are considered to be significant.

GLVIA 3 in paragraph 6.22 sets out advice on sequential views, JPAG still considers that this issue has not been adequately addressed. This is a necessary part of understanding the cumulative effects on the wider regional landscape in combination with other projects.

In our response to the first set of questions (REP2-130) addressing Q11.1.12 Cumulative landscape and visual assessment; we set out detailed comments on this point. These remain legitimate concerns that have not been addressed. For the sake of brevity those earlier comments are not repeated here.

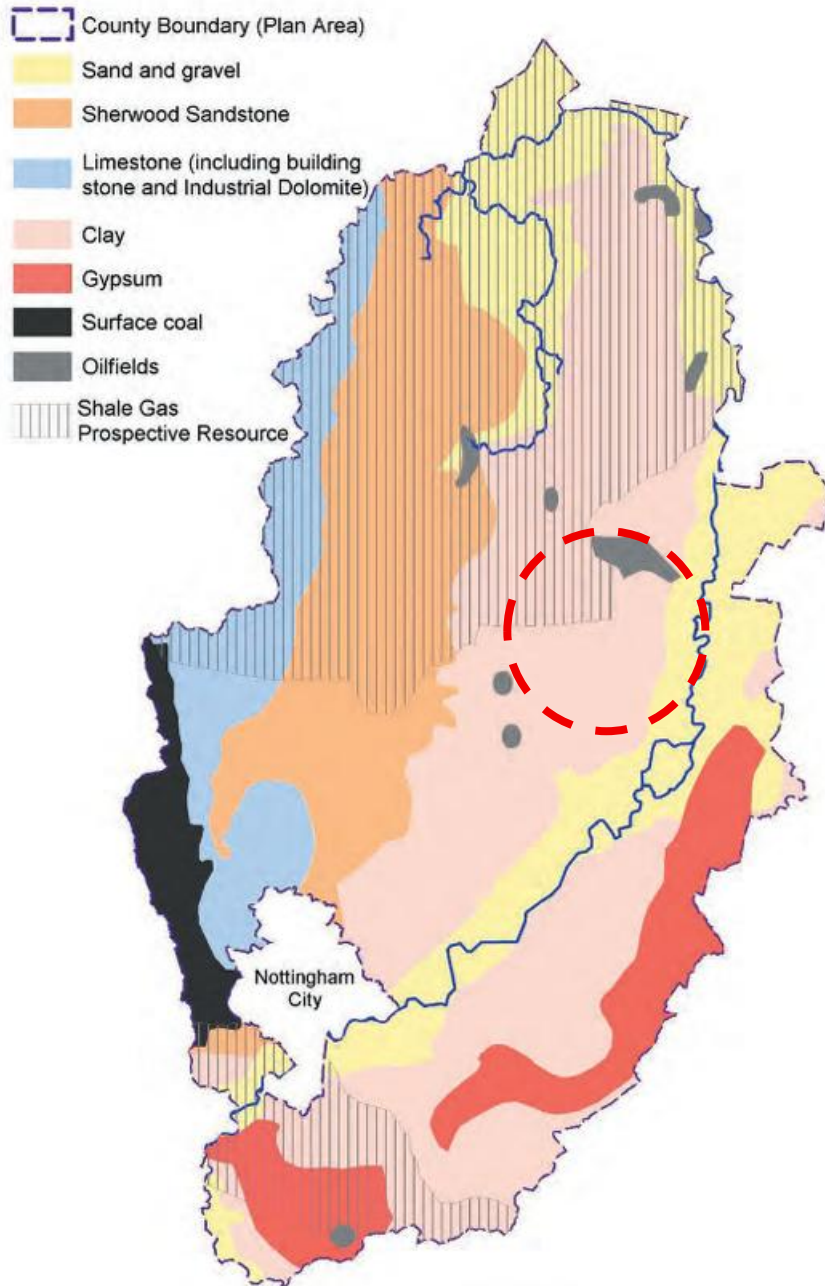
Q11.2.7 The evolving character of the regional landscape

In response to the discussion of the cumulative effects of solar development on regional landscape character at ISH3, the applicant's written summary in response to action point 4 (p48/49) [REP3-101] sets out that in a regional context the landscape change relating to solar farms can be directly traced to the legacy of the coal fields and the Trent which have strongly influenced the shaping of the regional landscape character for the purposes of generating power since the 1960's. IPs are invited to comment on this characterisation of the evolved landscape character and its implications for the capacity of the landscape to accommodate large scale solar development.

The local area contains a large amount of existing national infrastructure including Staythorpe Power Station, many overhead lines, the A1, the A46 and the East Coast Mainline. It is also a focus for major industrial development including the Sugar Factory as well as extensive sand and gravel extraction as well as brick clay extraction. The mineral activity contributes to infrastructure and

housing construction. These existing elements already has a substantial land take, and additional land is approved or allocated for mineral extraction. Kirton to the north-west is used for brick clay extraction and manufacture.

Pockets across the GNR area have been home to oilfields, during World War II, oil extraction started from land at Eakring. Since then, further oil fields have been identified mostly in north Nottinghamshire but ranging as far south as Rempstone near the county boundary with Leicestershire. In the 1970s, Nottinghamshire was the biggest producer of onshore oil in the UK.

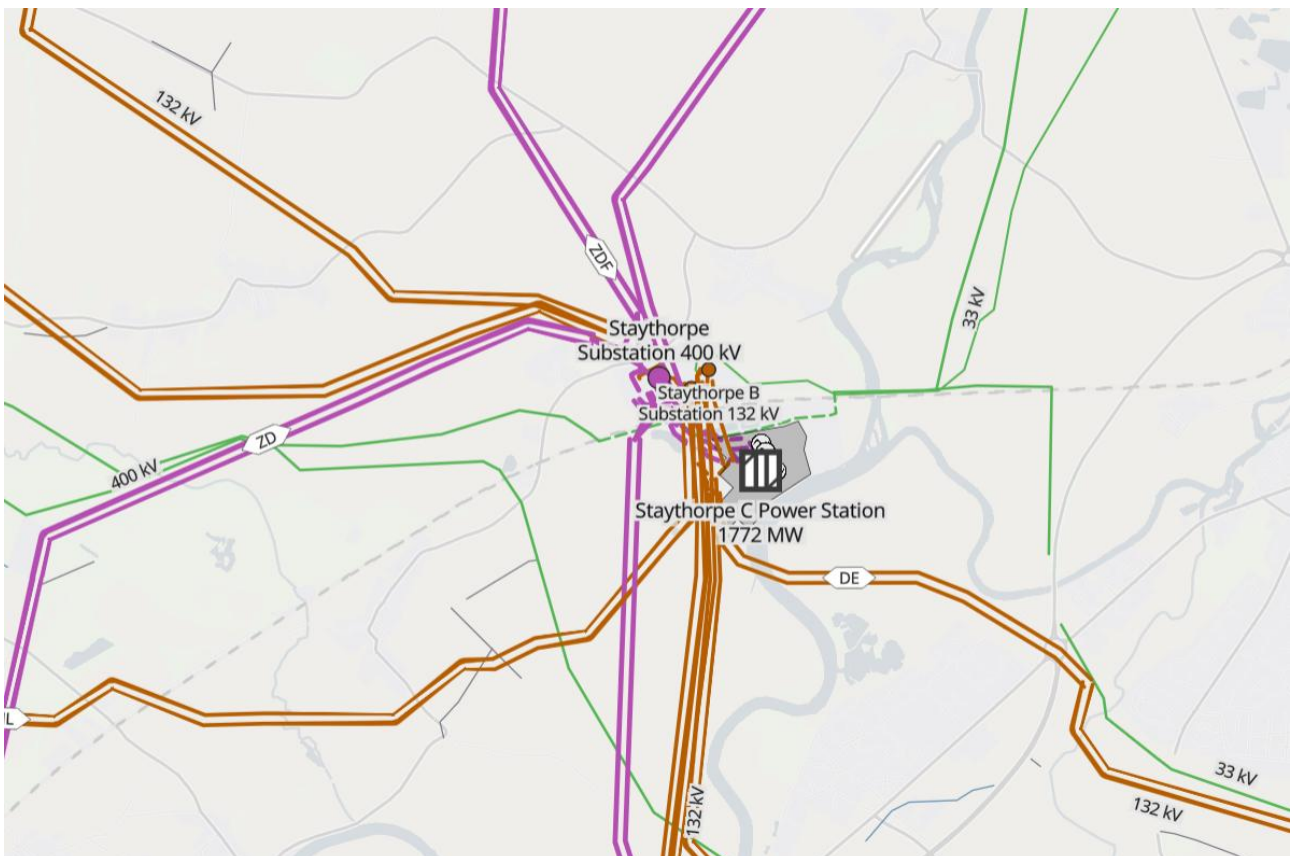


Mineral Resource of Nottinghamshire

The River Trent valley is home to major sand and gravel quarrying, existing and proposed that has a substantial land take. These are shown on the cumulative impact maps that JPAG has produced, the latest version of these maps is submitted alongside these answers to the second set of questions.

Nottinghamshire had 5 coal fired power station sites, of which 4 were located in north Nottinghamshire. There is a strong historical inter-relationship between the existing and former power station sites along the River Trent valley; namely Staythorpe, High Marnham, Cottam, and West Burton. These all lie in the Districts of Newark & Sherwood and Bassetlaw and form a 30km long line of major grid connections. These grid connections are the focus for a concentration and clustering of a large number of approved and proposed solar farm projects, BESS projects together with other energy and infrastructure proposals.

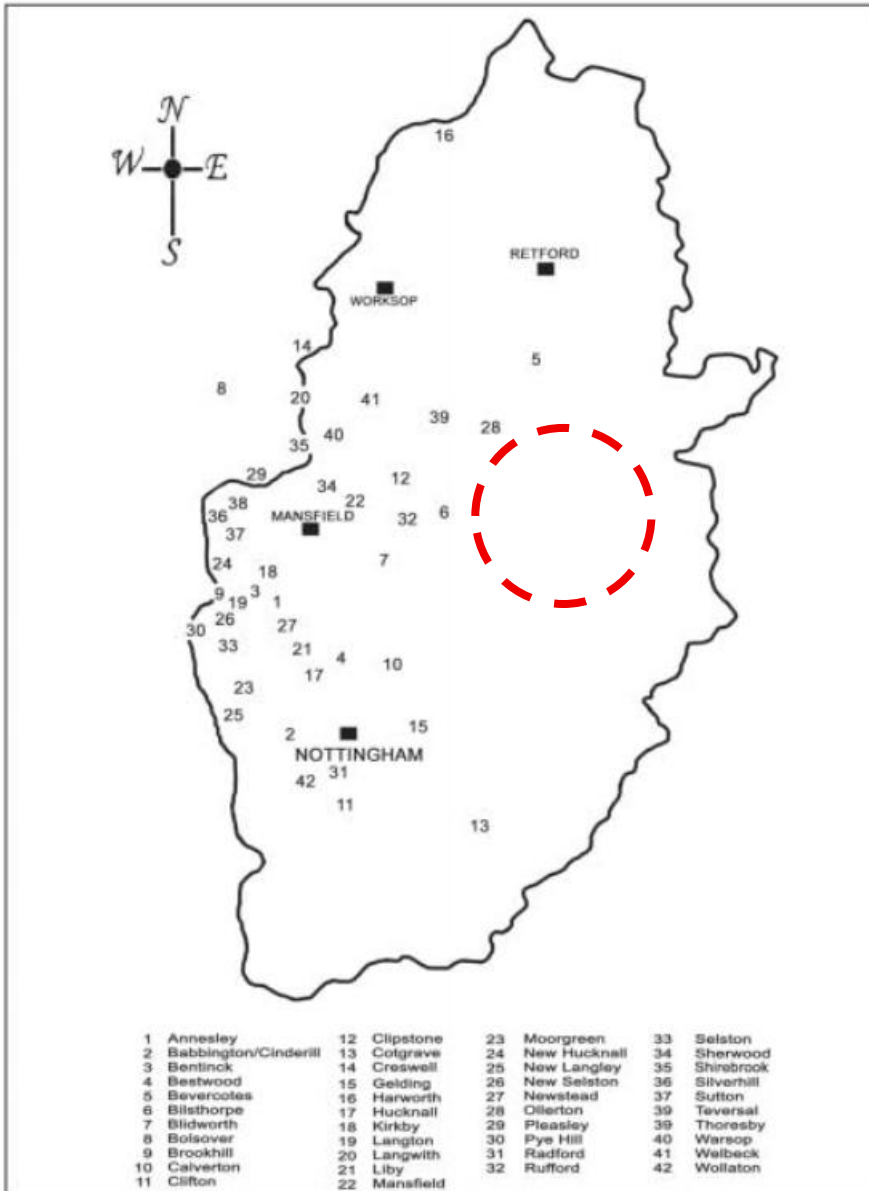
Staythorpe Power Station was one of the first power stations in the country and has continued to power the country over the last 75 years. With the proposed carbon capture and storage plant, the power station will continue to operate for many generations yet.



Open Infrastructure Map Showing Concentration of 11 High Voltage Overhead Lines (400kV & 132kV) at Staythorpe Together with 3 Medium Voltage Overhead Lines (33kV)

Due to this history of power generation and the fact that Staythorpe was one of the first, means that Staythorpe is a major hub for overhead lines as shown on the plan above.

MAP SHOWING THE NOTTINGHAMSHIRE COALFIELDS



Nottinghamshire Coalfield Map

GNR is 85% the size of the built-up area of the Newark Urban Area (which includes Newark, Balderton & Fernwood and the Planned Urban Extensions of Land South of Newark, Land East of Newark & Land Around Fernwood). GNR is over 5 times the size of East Midlands Airport and is 31 times larger than Staythorpe Power Station.

The scale of GNR is disproportionate to host communities. The Development is a doughnut in shape that extends across an area of in excess of 18 thousand hectares, that's 181 square kilometres of

which 1,765ha, is encompassed within the Order Limits. The majority of the land within the Order Limits is currently used for arable crops or is otherwise down to pasture.

The applicant misunderstands the landscape due to a lack of local knowledge or understanding of the landscape in which the scheme is proposed. The agricultural landscape lies between the River Trent valley and its associated infrastructure (minerals, power generation, roads railway) and the former Nottinghamshire coalfield to the north-west, west and south-west.

The GNR project lies within National Character Area: 48 - Trent and Belvoir Vales. Natural England describe this NCA⁶ as:

“The Trent and Belvoir Vales National Character Area (NCA) is characterised by undulating, strongly rural and predominantly arable farmland, centred on the River Trent. A low-lying rural landscape with relatively little woodland cover, the NCA offers long, open views. Newark-on-Trent (generally referred to as Newark) lies at the centre with Grantham, Nottingham, Lincoln and Gainsborough on the peripheries. The southern and eastern edges of the Vales are defined by the adjoining escarpments of the Lincolnshire Edge and the Leicestershire and Nottinghamshire Wolds NCA. To the west, the escarpment of a broad ridge of rolling landscape defines the boundary with the neighbouring Sherwood and Humberhead Levels NCAs. The area’s generally fertile soils and good quality agricultural land have supported a diversity of farming over a long period but, because of this, little semi-natural habitat remains. The powerful River Trent and its flood plain provide a strong feature running through the landscape. It is the greatest biodiversity resource, being a major corridor for wildlife moving through the area and supporting a variety of wetland habitats. It also provides flood storage as well as large amounts of cooling water for local power stations.”

Natural England continues to describe the Trent and Belvoir Vales - Key Characteristics as:

- *“A gently undulating and low-lying landform in the main, with low ridges dividing shallow, broad river valleys, vales and flood plains. The mature, powerful River Trent flows north through the full length of the area, meandering across its broad flood plain and continuing to influence the physical and human geography of the area as it has done for thousands of years.*
- *The bedrock geology of Triassic and Jurassic mudstones has given rise to fertile clayey soils across much of the area, while extensive deposits of alluvium and sand and gravel have given rise to a wider variety of soils, especially in the flood plains and over much of the eastern part of the NCA.*

⁶ <https://nationalcharacterareas.co.uk/Trent-and-Belvoir-Vales/>

- *Agriculture is the dominant land use, with most farmland being used for growing cereals, oilseeds and other arable crops. While much pasture has been converted to arable use over the years, grazing is still significant in places, such as along the Trent and around settlements.*
- *A regular pattern of medium to large fields enclosed by hawthorn hedgerows, and ditches in low-lying areas, dominates the landscape.*
- *Very little semi-natural habitat remains across the area; however, areas of flood plain grazing marsh are still found in places along the Trent.*
- *Extraction of sand and gravel deposits continues within the Trent flood plain and the area to the west of Lincoln. Many former sites of extraction have been flooded, introducing new waterbodies and new wetland habitats to the landscape.*
- *Extensive use of red bricks and pantiles in the 19th century has contributed to the consistent character of traditional architecture within villages and farmsteads across the area. Stone hewn from harder courses within the mudstones, along with stone from neighbouring areas, also feature as building materials, especially in the churches.*
- *A predominantly rural and sparsely settled area with small villages and dispersed farms linked by quiet lanes, contrasting with the busy market towns of Newark and Grantham, the cities of Nottingham and Lincoln, the major roads connecting them and the cross-country dual carriageways of the A1 and A46.*
- *Immense coal-fired power stations in the north exert a visual influence over a wide area, not just because of their structures but also the plumes that rise from them and the pylons and power lines that are linked to them. The same applies to the gas-fired power station and sugar beet factory near Newark, albeit on a slightly smaller scale.”*

The NCA description identifies the dominance that the power stations, the power lines, the Sugar Factory and sand and gravel extraction already have on the character area. The GNR proposal would involve the industrialisation of the agricultural heartland that is already penned in between existing infrastructure and former/existing industrial uses. The agricultural area is consequently higher susceptible to change and hasn't got the capacity to accommodate such a large proposal.

It is already pepper potted by existing permitted solar and BESS proposals and the GNR proposal would in our view far exceed the capacity of the landscape to accept change.

Natural England identify the landscape opportunities for Trent and Belvoir Vales NCA as:

- *“Conserve the rural settlement pattern by ensuring that new development is complementary to intrinsic local character.*
- *Conserve rural settlement character by using traditional materials in new developments especially the use of matching red brick and pantiles. Conserve the strongly nucleated character of settlements by encouraging new development to take place within the existing curtilage of settlements.*
- *Protect the tranquillity of the area by planning new developments carefully to minimise car use and accessible to sustainable transport. Ensure new developments are integrated well with adequate, well designed, green infrastructure. Resist new road development which threatens tranquillity.*
- *Protect archaeological remains from plough damage by adopting best land and soil management practices or, where opportunities arise, by creating areas requiring minimal cultivation, such as pasture and grazing marsh and other grassland habitats. Also seek to conserve organic remains by raising ground water levels in places such as the Trent flood plain.*
- *Restore and manage hedgerows, where they have been lost, to strengthen the historical field patterns, improve wildlife networks and enhance landscape character.*
- *Seek to ensure that farming remains the predominant use of the land but plan for sustainable agriculture which does not detract from existing character and enables landscape and habitat enhancement. Enhance the character and the mosaic of habitat networks in the farmed landscape by maximising agriculture diversity.*
- *Enhance tree cover throughout the NCA following the recommendations of the East Midlands Woodland Opportunity Mapping Guidance for each of the sub areas within the NCA through, for example, extensive planting of hedgerow trees. This is particularly important in view of the threat from ash dieback disease as ash is a characteristic species in the NCA. Protect and enhance the sinuous belts of trees and riparian habitats that demarcate watercourses, create new woodland on former sand and gravel extraction sites, and extend and link up existing ancient woodland sites. Plan for a landscape depleted of ash by planting replacement hedgerow tree species such as oak which is also characteristic of the area.*
- *Reconnect rivers with their flood plains and restore and create a mosaic of wetland and flood plain habitats including grazing marsh, pastures, fens, reedbeds, wet woodland and*

- eutrophic standing waters. Link and extend existing habitats to reverse the fragmentation that has taken place over the years. Make space for the natural development of rivers.*
- *Carefully manage the exploitation of sand and gravel deposits so that damage to archaeology and existing habitats is minimised and that biodiversity enhancements are maximised through the creation of new wetland habitats.*
 - *Conserve protected areas and other high quality habitats, the range and ecological variability of habitats and species. Create and plan to create new and better managed semi-natural habitats which are characteristic of the area for example flood plain grazing marsh, reedbeds, lowland meadows, lowland dry acid grasslands and heathland, and lowland calcareous grassland. Link and extend these existing habitats to maximise benefits to landscape character and biodiversity.*
 - *Encourage land management methods which protect and enhance those ecosystems which benefit agricultural production in order to secure the long term viability and character of the farmed, productive landscape.”*

The GNR proposal would not help to deliver these landscape opportunities. The encircling effect and the clustering needs to be properly considered as part of this proposal. The regularity of experience, what is commonly called the sequential views, would increase the impact on the landscape capacity 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.

No project operates in isolation; there is an undue concentrated attack on the sub-region from numerous proposals with new ones coming along all the time. The adverse impact of the development would make the proposal unacceptable as a whole. The development in itself and combination with other permitted schemes would in particular have a concentrated impact on the following broad areas:

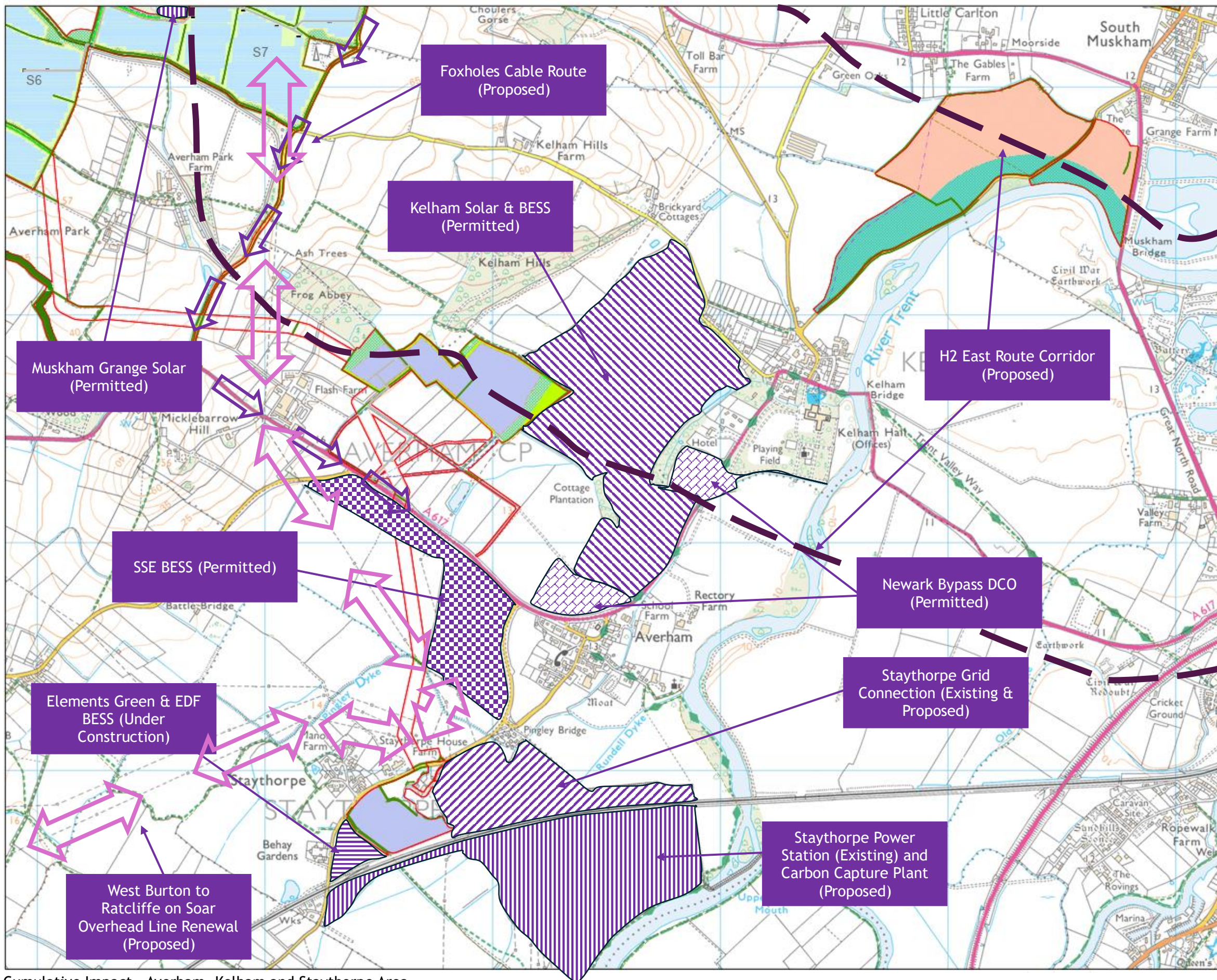
- Staythorpe, Averham, Kelham and Averham Park
- Averham Park and Knapthorpe
- Maplebeck and Kersall
- Carlton on Trent and Sutton on Trent
- Ossington and Moorhouse

Great North Road Solar and Biodiversity Park - Project EN010162

JPAG - Interested Party Reference [REDACTED]

Response to Second Set of Questions from Examining Authority

Cumulative Impact, Clustering and Concentration



Solar & Biodiversity Park

Key

- Site boundary
- Existing Public Rights of Way - Footpath
- Existing Public Rights of Way - Bridleway
- Proposed solar panels, inverters and gravel access tracks
- Proposed security fence
- Proposed BESS and substation areas (BESS and substation details not shown)
- Proposed tarmac access track with BESS/substation area

Green infrastructure

- Existing woodland and trees
- Existing hedgerows
- Proposed hedgerows
- Proposed hedge and tree belt
- Proposed line of trees
- Proposed woodland
- Proposed tree belt
- Areas to be reinstated
- Proposed grassland (PV areas) - species diverse
- Proposed diverse grassland
- Proposed diverse grassland - Minkbeek
- Agricultural: Arable
- Proposed wood pasture
- Proposed ecotone
- Proposed riparian corridor
- Proposed community orchard

Access Proposals

- Proposed Permissive Footpath
- Proposed Permissive Bridleway
- Footpath to be diverted
- Proposed footpath diversion route

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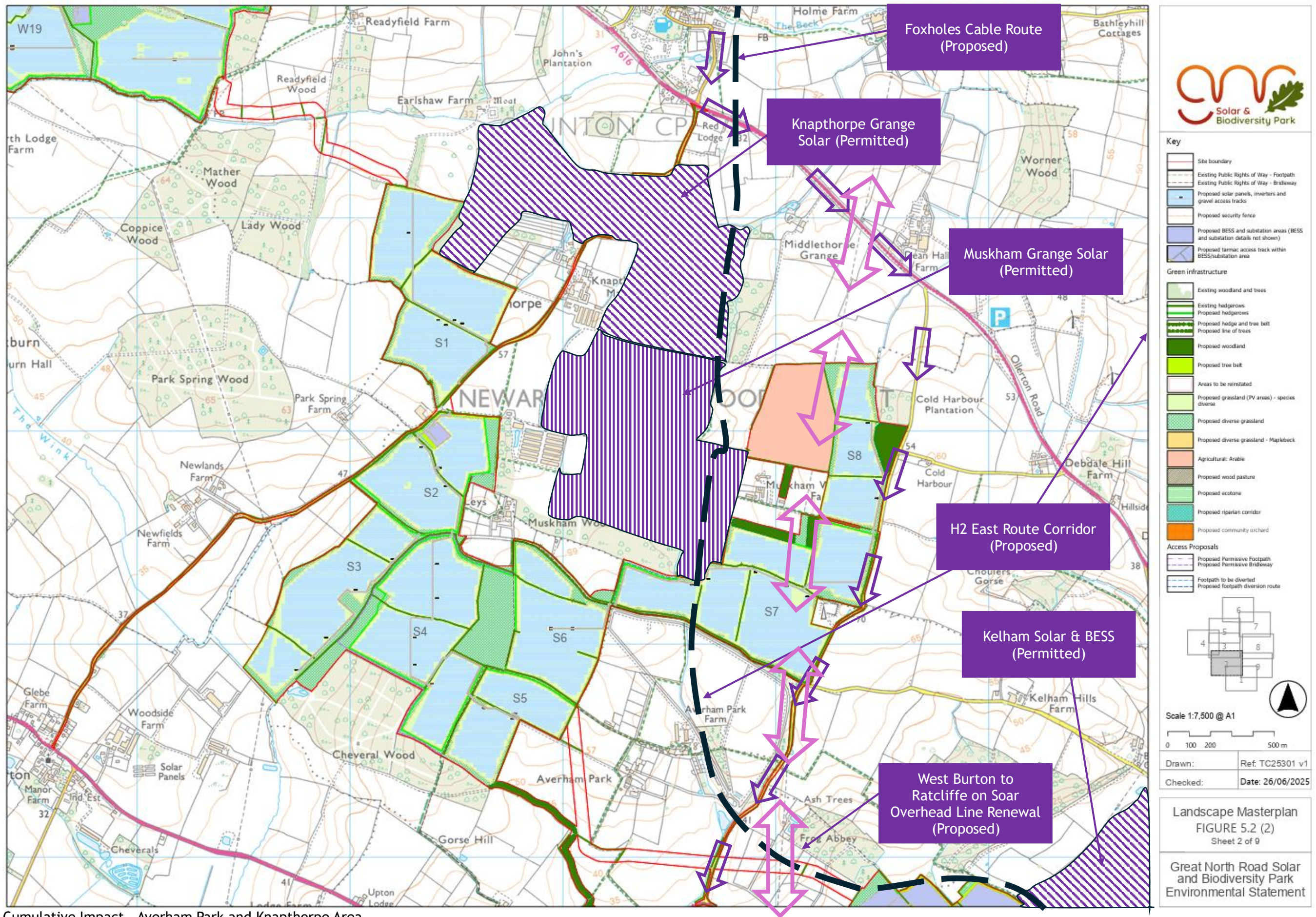
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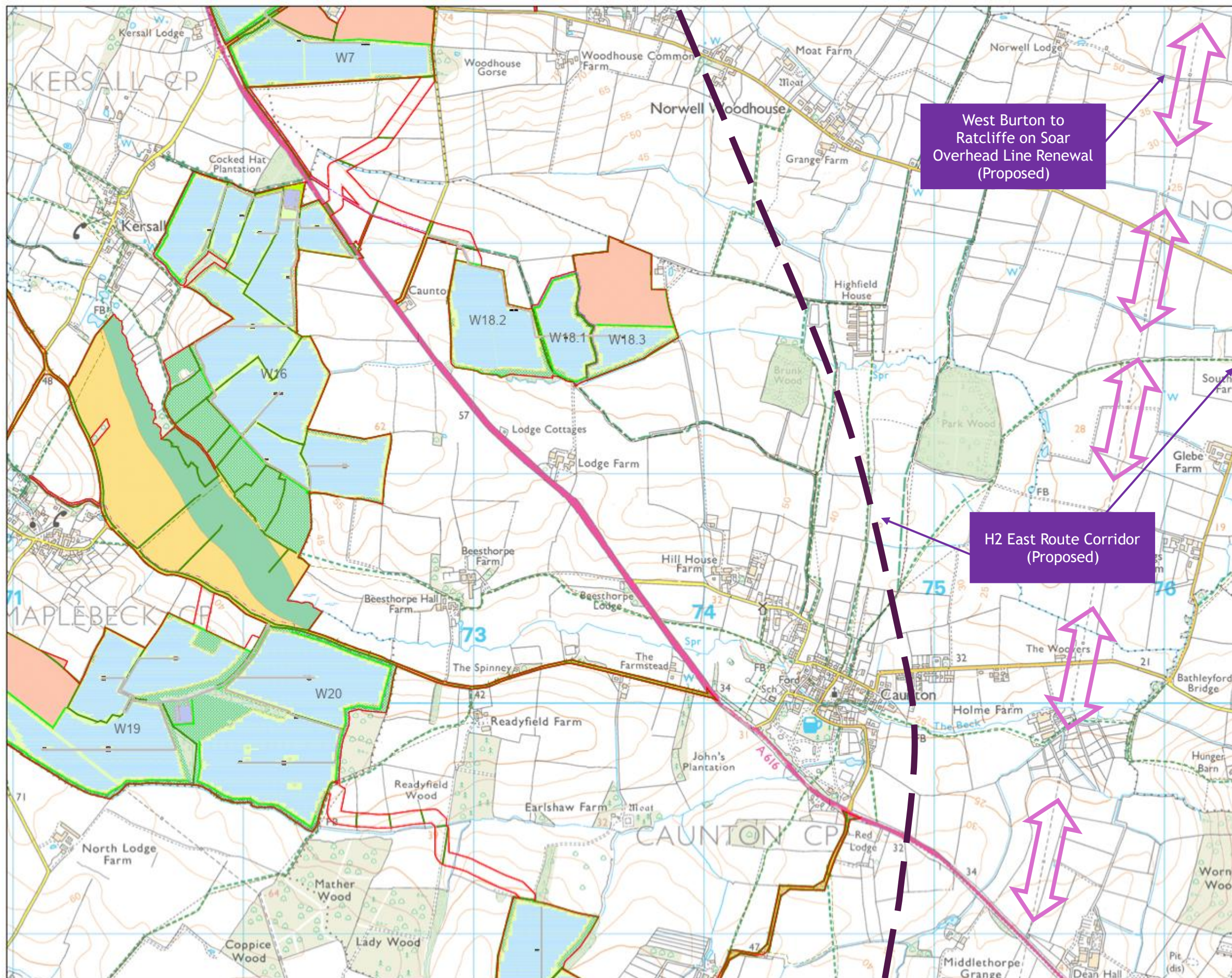
Landscape Masterplan
FIGURE 5.2 (1)
Sheet 1 of 9


Great North Road Solar and Biodiversity Park Environmental Statement

Cumulative Impact - Averham, Kelham and Staythorpe Area










Cumulative Impact - Averham Park and Knapthorpe Area




















Solar & Biodiversity Park





Key

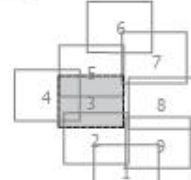
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-  Existing Public Rights of Way - Footpath
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-  Proposed solar panels, inverters and gravel access tracks
-  Proposed security fence
-  Proposed BESS and substation areas (BESS and substation details not shown)
-  Proposed tarmac access track within BESS/substation area

Green infrastructure

-  Existing woodland and trees
-  Existing hedgerows
-  Proposed hedgerows
-  Proposed hedge and tree belt
-  Proposed line of trees
-  Proposed woodland
-  Proposed tree belt
-  Areas to be reinstated
-  Proposed grassland (PV areas) - species diverse
-  Proposed diverse grassland
-  Proposed diverse grassland - Maplebeck
-  Agricultural Arable
-  Proposed wood pasture
-  Proposed ecotone
-  Proposed riparian corridor
-  Proposed community orchard

Access Proposals

-  Proposed Permissive Footpath
-  Proposed Permissive Bridleway
-  Footpath to be diverted
-  Proposed footpath diversion route



Scale 1:7,500 @ A1

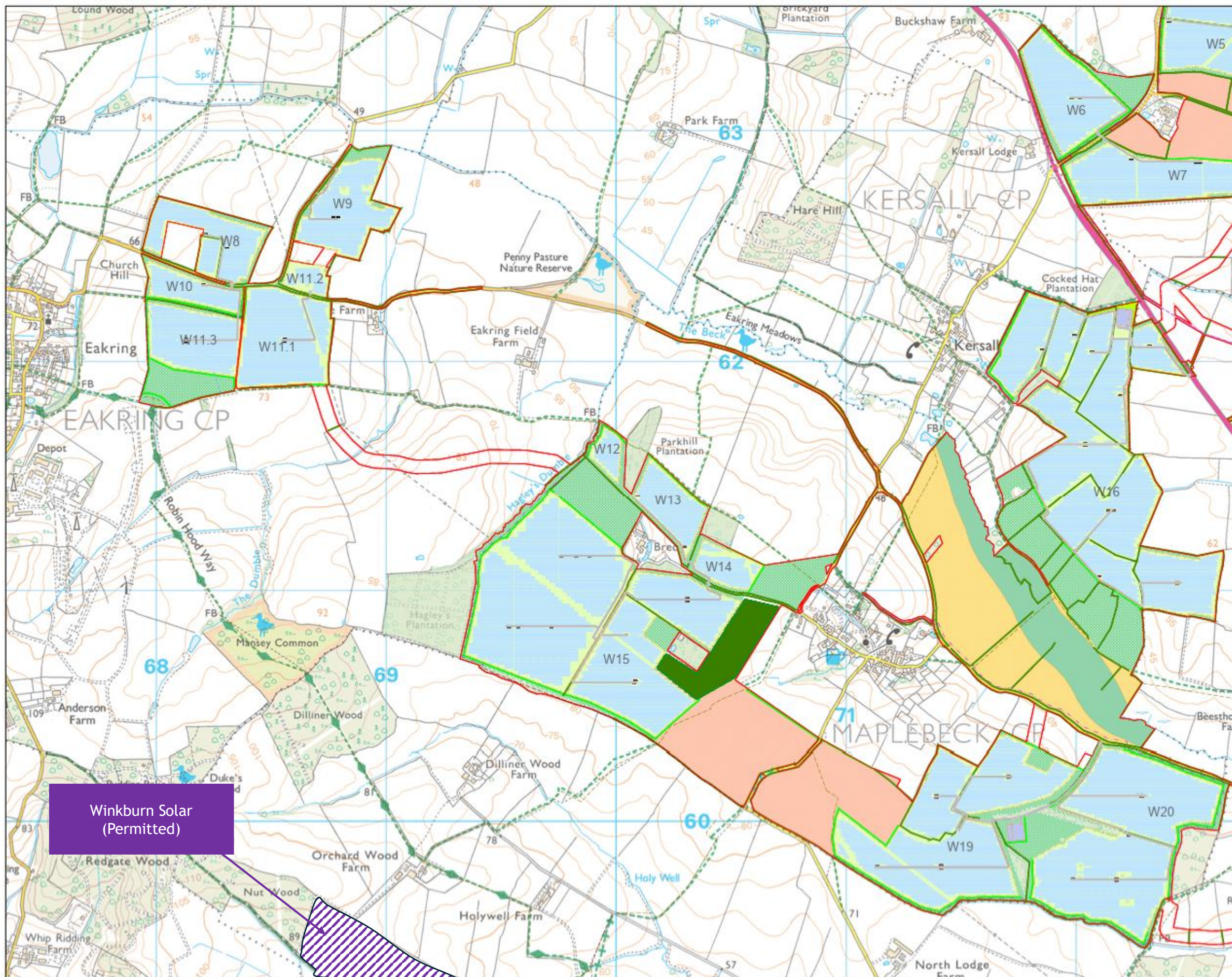
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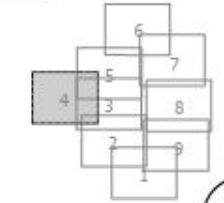
Landscape Masterplan
FIGURE 5.2 (3)
Sheet 3 of 9

Great North Road Solar and Biodiversity Park
Environmental Statement

Cumulative Impact - Cauntton and Norwell Area



- Key**
- Site boundary
 - Existing Public Rights of Way - Footpath
 - Existing Public Rights of Way - Bridleway
 - Proposed solar panels, inverters and gravel access tracks
 - Proposed security fence
 - Proposed BESS and substation areas (BESS and substation details not shown)
 - Proposed tarmac access track within BESS/substation area
- Green infrastructure**
- Existing woodland and trees
 - Existing hedgerows
 - Proposed hedgerows
 - Proposed hedge and tree belt
 - Proposed line of trees
 - Proposed woodland
 - Proposed tree belt
 - Areas to be reinstated
 - Proposed grassland (PV areas) - species diverse
 - Proposed diverse grassland
 - Proposed diverse grassland - Maplebeck
 - Agricultural Arable
 - Proposed wood pasture
 - Proposed ecotone
 - Proposed riparian corridor
 - Proposed community orchard
- Access Proposals**
- Proposed Permissive Footpath
 - Proposed Permissive Bridleway
 - Footpath to be diverted
 - Proposed footpath diversion route



Scale 1:7,500 @ A1

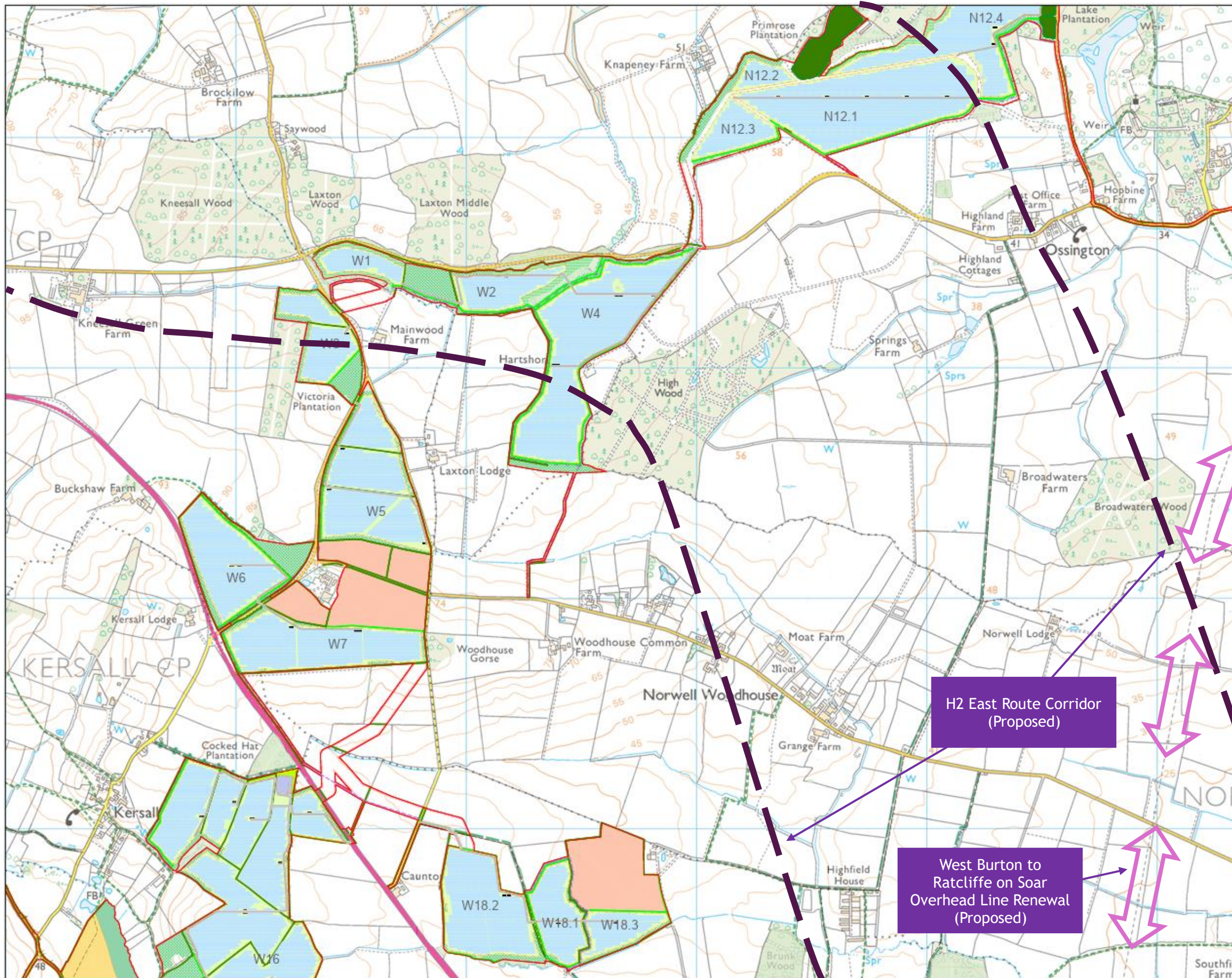



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Landscape Masterplan
 FIGURE 5.2 (4)
 Sheet 4 of 9








Great North Road Solar and Biodiversity Park
 Environmental Statement

Cumulative Impact - Winkburn and Maplebeck




















Solar & Biodiversity Park





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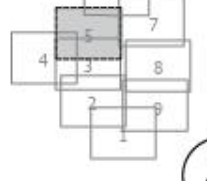
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-  Existing Public Rights of Way - Footpath
-  Existing Public Rights of Way - Brideway
-  Proposed solar panels, inverters and gravel access tracks
-  Proposed security fence
-  Proposed BESS and substation areas (BESS and substation details not shown)
-  Proposed farm access track with BESS/substation area

Green infrastructure

-  Existing woodland and trees
-  Existing hedgerows
-  Proposed hedgerows
-  Proposed hedge and tree belt
-  Proposed line of trees
-  Proposed woodland
-  Proposed tree belt
-  Areas to be revegetated
-  Proposed grassland (PV areas) - species diverse
-  Proposed diverse grassland
-  Proposed diverse grassland - Maplebeck
-  Agricultural: Arable
-  Proposed wood pasture
-  Proposed ecotone
-  Proposed riparian corridor
-  Proposed community orchard

Access Proposals

-  Proposed Permissive Footpath
-  Proposed Permissive Brideway
-  Footpath to be diverted
-  Proposed footpath diversion route



Scale 1:7,500 @ A1

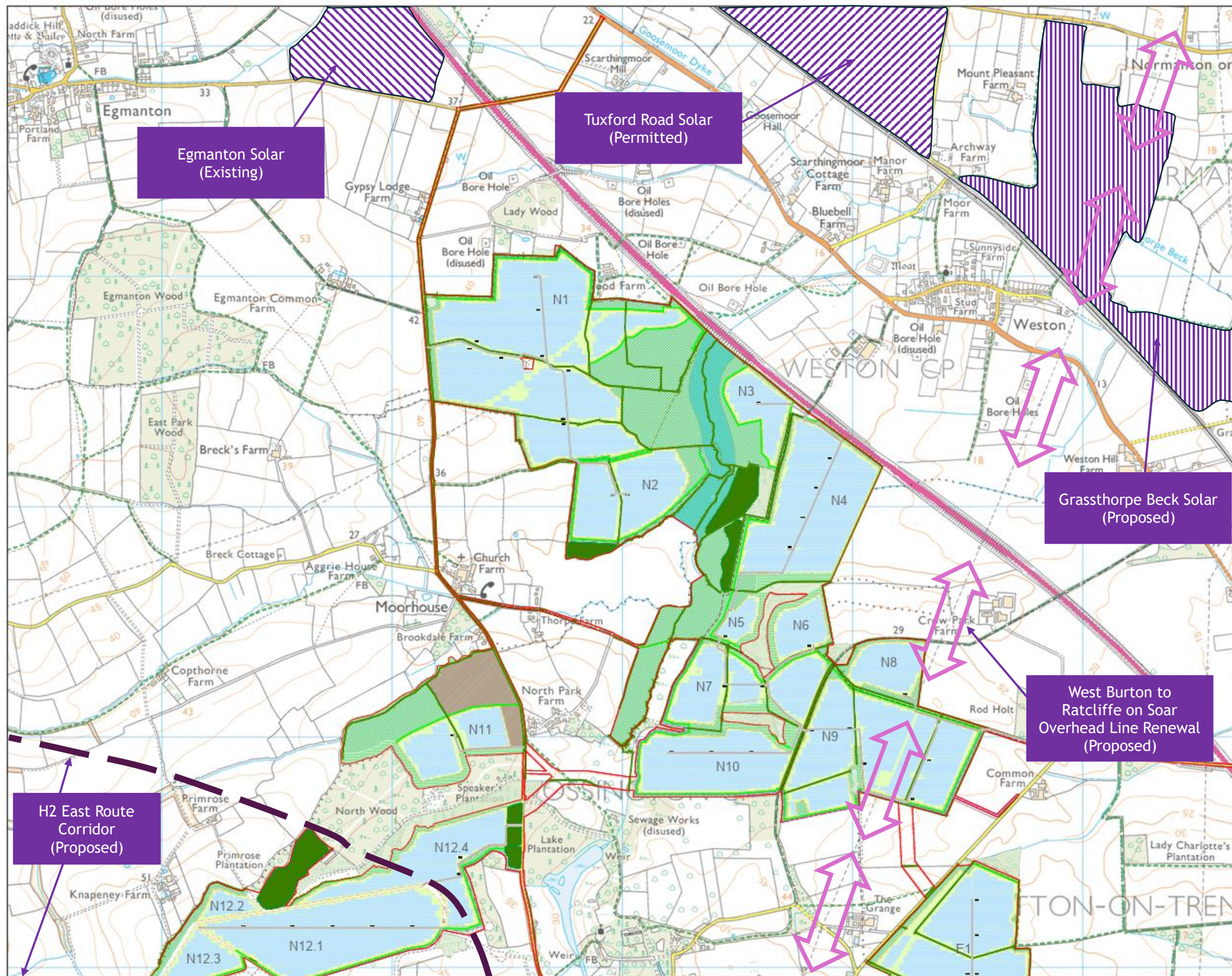
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Landscape Masterplan
FIGURE 5.2 (5)
Sheet 5 of 9




Great North Road Solar and Biodiversity Park
Environmental Statement

Cumulative Impact - Norwell and Ossington









Solar & Biodiversity Park




Key

-  Site boundary
-  Existing Public Rights of Way - Footpath
-  Existing Public Rights of Way - Bridleway
-  Proposed solar panels, inverters and gravel access tracks
-  Proposed security fence
-  Proposed BESS and substation areas (BESS and substation details not shown)
-  Proposed tarmac access track within BESS/substation area

Green infrastructure

-  Existing woodland and trees
-  Existing hedgerows
-  Proposed hedgerows
-  Proposed hedge and tree belt
-  Proposed line of trees
-  Proposed woodland
-  Proposed tree belt
-  Areas to be reinstated
-  Proposed grassland (PV areas) - species diverse
-  Proposed diverse grassland
-  Proposed diverse grassland - Mappiback
-  Agricultural: Arable
-  Proposed wood pasture
-  Proposed ecotone
-  Proposed riparian corridor
-  Proposed community orchard

Access Proposals

-  Proposed Permissive Footpath
-  Proposed Permissive Bridleway
-  Footpath to be diverted
-  Proposed footpath diversion route



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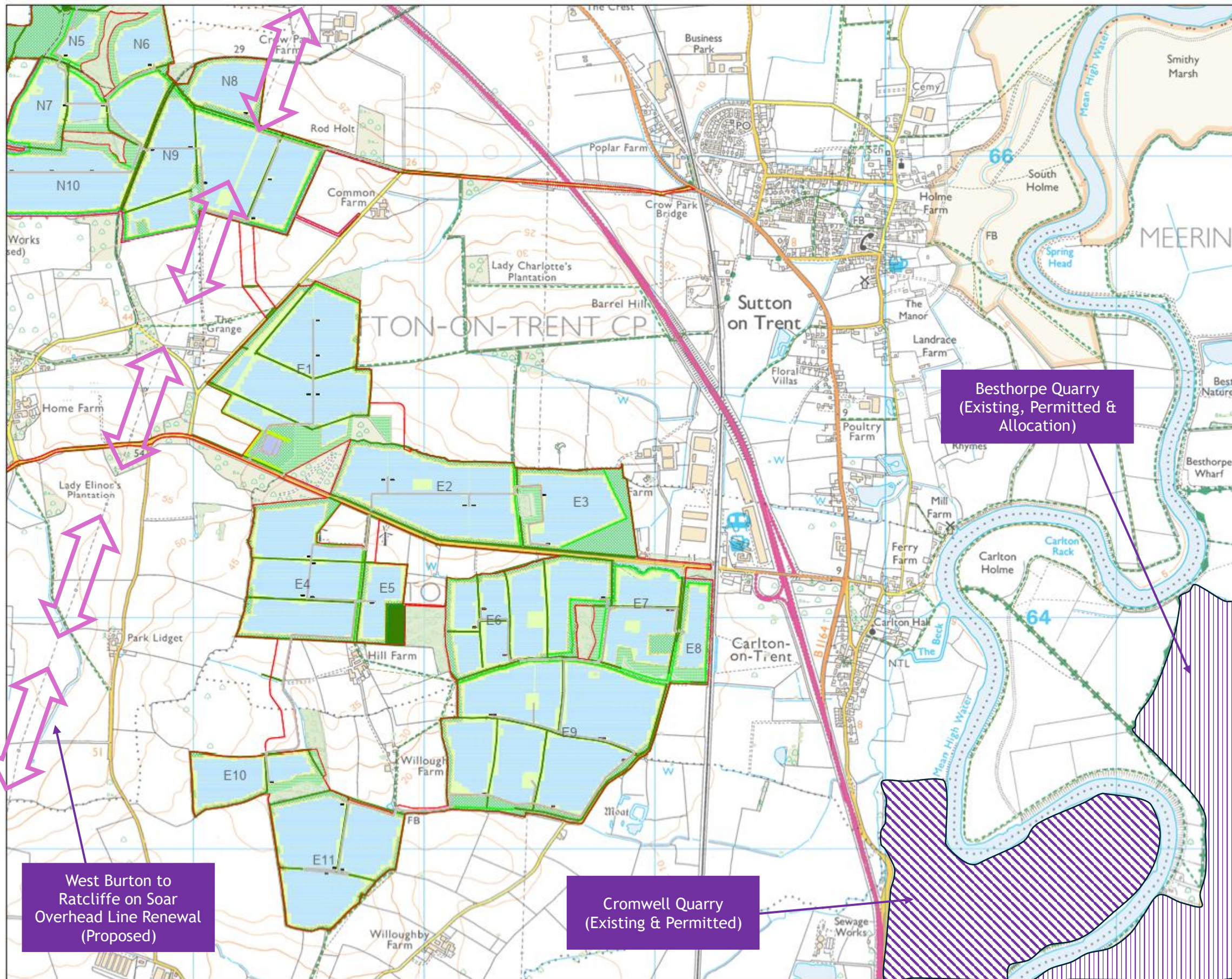
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Landscape Masterplan
FIGURE 5.2 (6)
Sheet 6 of 9

Great North Road Solar
and Biodiversity Park
Environmental Statement

Cumulative Impact - Ossington, Egmonton and Weston



Solar & Biodiversity Park

Key

- Site boundary
- Existing Public Rights of Way - Footpath
- Existing Public Rights of Way - Bridleway
- Proposed solar panels, inverters and gravel access tracks
- Proposed security fence
- Proposed BESS and substation areas (BESS and substation details not shown)
- Proposed tarmac access track within BESS/substation area

Green infrastructure

- Existing woodland and trees
- Existing hedgerows
- Proposed hedgerows
- Proposed hedge and tree belt
- Proposed line of trees
- Proposed woodland
- Proposed tree belt
- Areas to be reinstated
- Proposed grassland (PV areas) - species diverse
- Proposed diverse grassland
- Proposed diverse grassland - Maptbeck
- Agricultural Arable
- Proposed wood pasture
- Proposed ecotone
- Proposed riparian corridor
- Proposed community orchard

Access Proposals

- Proposed Permissive Footpath
- Proposed Permissive Bridleway
- Footpath to be diverted
- Proposed footpath diversion route

Scale 1:7,500 @ A1

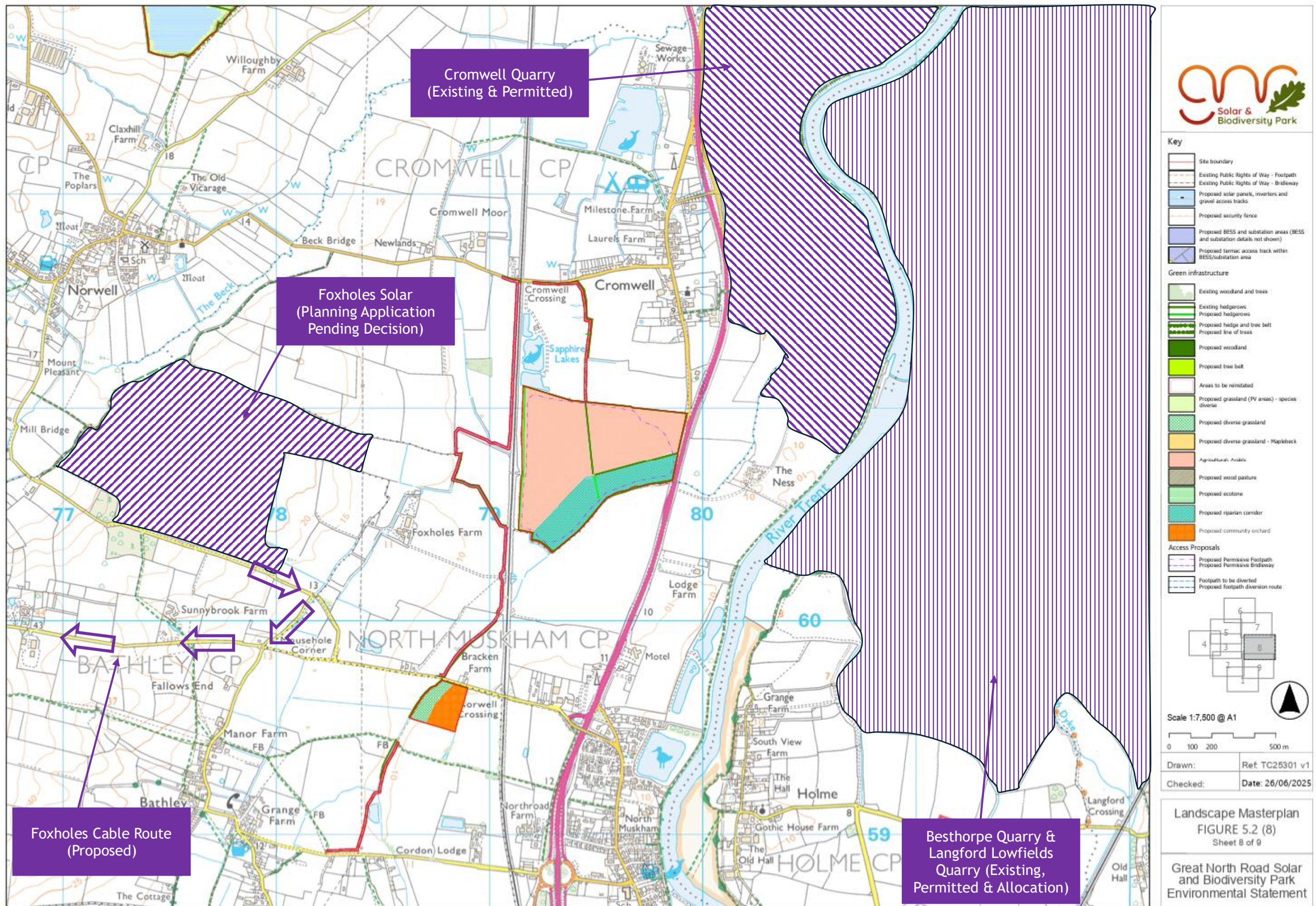
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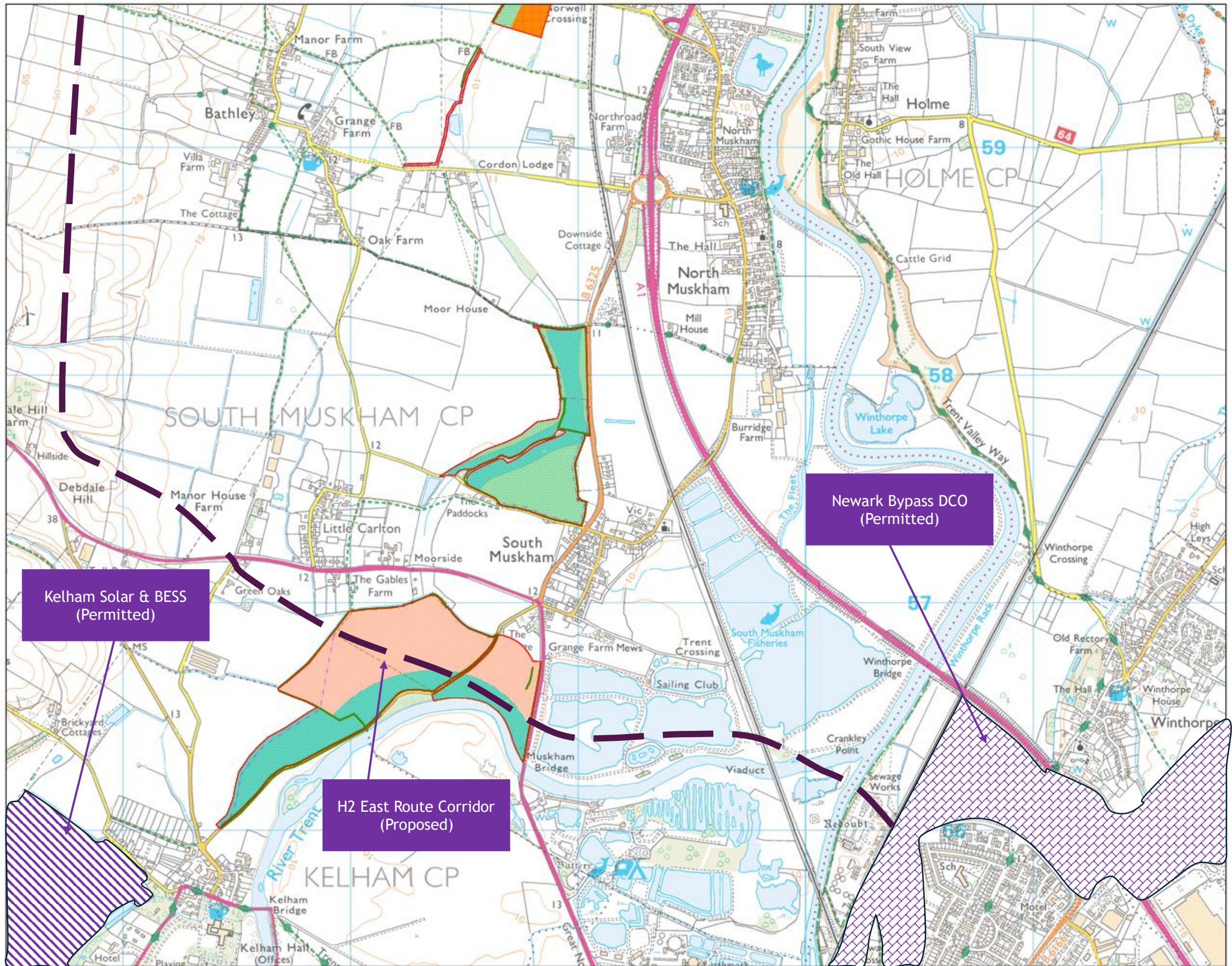
Landscape Masterplan
FIGURE 5.2 (7)
Sheet 7 of 9

Great North Road Solar and Biodiversity Park
Environmental Statement

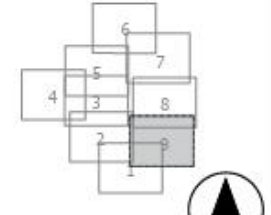
Cumulative Impact - Carlton on Trent Area



Cumulative Impact - Norwell and Cromwell Area



- Key**
- Site boundary
 - Existing Public Rights of Way - Footpath
 - Existing Public Rights of Way - Bridleway
 - Proposed solar panels, inverters and gravel access tracks
 - Proposed security fence
 - Proposed BESS and substation areas (BESS and substation details not shown)
 - Proposed farm access track within BESS/substation area
- Green infrastructure**
- Existing woodland and trees
 - Existing hedgerows
 - Proposed hedgerows
 - Proposed hedge and tree belt
 - Proposed line of trees
 - Proposed woodland
 - Proposed tree belt
 - Areas to be reinstated
 - Proposed grassland (PV areas) - species diverse
 - Proposed diverse grassland
 - Proposed diverse grassland - Mopbeck
 - Agricultural: Arable
 - Proposed wood pasture
 - Proposed ecotone
 - Proposed riparian corridor
 - Proposed community orchard
- Access Proposals**
- Proposed Permissive Footpath
 - Proposed Permissive Bridleway
 - Footpath to be diverted
 - Proposed footpath diversion route



Scale 1:7,500 @ A1

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Landscape Masterplan
 FIGURE 5.2 (9)
 Sheet 9 of 9

Great North Road Solar
 and Biodiversity Park
 Environmental Statement

Cumulative Impact - North Muskham & South Muskham Area