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FAO: The Examining Authority
National Infrastructure Planning
Planning Inspectorate

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9 April 2026

Dear Sirs

GREAT NORTH ROAD SOLAR AND BIODIVERSITY PARK (“PROJECT”) – UPDATE TO NATIONAL HIGHWAYS’ (“NH”) DEADLINE 4 SUBMISSION

We act for NH, as interested party to the application by Elements Green Trent Limited (“**Applicant**”) for an order granting development consent for the Project (“**DCO**”).

We write further to NH’s Deadline 4 submission on 25 March 2026 (“**Submission**”), which responded to Q2.2.11 of the Examining Authority’s second written questions and requests for information (“**ExQ2**”), concerning approval rights in respect of Requirements 5, 14, 19 and 22 of the Applicant’s draft DCO.

Following the Submission, we have identified two further relevant precedents that support NH’s position that, where Requirements relate directly to the safety, operation or management of the Strategic Road Network (“**SRN**”), NH should be listed as an approving body rather than solely a consultee. These are in addition to the Viking CCS Carbon Dioxide Pipeline DCO, referenced in the Submission, which was granted by the Secretary of State with provisions requiring NH approval for safety-critical matters within NH’s statutory remit.

The East Midlands Gateway Phase 2 (“EMG2”)

Requirement 11 (Construction environmental management plan) of the [draft development consent order for EMG2](#) expressly provides that no part of the authorised development is to commence until a phase-specific construction environmental management plan (and any revision of that plan) has been submitted to and approved in writing by the local planning authority or the relevant highway authority where the plan relates to highway works.

NH is one such relevant highway authority for the purposes of the EMG2 project.

The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 (“Yorkshire Green”)

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Requirement 5(1) (Construction management plans) of the [made Yorkshire Green order](#) offers a recent example of a requirement structured so that highway authority approval is necessary before certain plans may be discharged, where those plans intersect with SRN interests.

Yorkshire Green is an energy project determined by the same Secretary of State as the present application, and involving a materially similar interface with the SRN as proposed by the Applicant for the DCO: the construction and installation of an electric overhead line. This further confirms that decisions of the Secretary of State in 2024 and thereafter support NH's position in this DCO examination.

NH therefore wishes to update and confirm that, consistent with established precedent, it remains both justified and necessary for NH to be named as an approving body in respect of Requirements 5, 14, 19 and 22. This ensures that safety-critical matters affecting the SRN cannot inadvertently be deemed discharged in the absence of NH review.

We trust that the Examining Authority will find the additional examples helpful in considering this matter. NH would be pleased to provide any further information the Examining Authority may require.

Yours faithfully

A handwritten signature in black ink that reads "Pinsent Masons LLP". The signature is written in a cursive, slightly slanted style.

Pinsent Masons LLP