



Great North Road Solar and Biodiversity Park

Responses to Deadline 4 Submissions

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1 INTRODUCTION

1.1 PURPOSE OF THE REPORT

1.1.1 This report provides the Applicant's responses to submissions from Interested Parties received at Deadline 4 in respect of the Great North Road Solar and Biodiversity Park (hereafter referred to as "the Development").

1.2 STRUCTURE

1.2.1 This document is structured as follows:

- Section 1 of this report sets out the purpose, structure and approach taken in the report.
- Section 2 signposts to the Applicant's responses to the Category 1 stakeholders with which the Applicant has development Statement of Common Ground (SoCGs).
- Section 3 provides the Applicant's responses to the Interested Parties' submissions made at Deadline 4.
- Section 4 provides the Applicant's responses to the ExA's schedule of changes to the draft Development Consent Order.

1.3 APPROACH

1.3.1 A total of 21 submissions were submitted by 17 Interested Parties ('IPs') at Deadline 4. These were submitted by:

- Barry G D Walton
- BBS Law Ltd on behalf of Drone Defence Services Ltd
- BBS Law Ltd on behalf of Richard Gill
- Cadent Gas Limited
- Carlton-on-Trent Parish Council
- Environment Agency
- Historic England
- JPAG
- Laxton and Moorhouse Solar Concerns
- MKLTD Private Security Practice
- National Gas Transmission PLC
- Natural England

- Newark and Sherwood District Council
 - Norwell Solar Farm Steering Group
 - Nottinghamshire County Council
 - Ossington Solar Concerns
 - Pinsent Masons LLP on behalf of National Highways
- 1.3.2 A further submission from National Highways has also been accepted at the discretion of the Examining Authority.
- 1.3.3 This report does not look to duplicate the Applicant's responses to the previous submissions at Deadlines 1 [\[REP2-115\]](#), 2 [\[REP2-116\]](#), 3 [\[REP3-098\]](#), 4 [\[REP4-060\]](#), **Responses to First Written Questions [EN010162/APP/8.22A] [\[REP3-096\]](#)**, or **Second Written Questions [EN010162/APP/8.30] [\[REP4-060\]](#)**. Where appropriate to avoid repetition, the Applicant has sought to cross-refer back to responses provided in those documents, supplemented by additional information that has been entered into the Examination since those documents were prepared.
- 1.3.4 It is not intended to be an exhaustive response on all matters and deals only with certain points where it is considered appropriate or helpful to respond in writing at this stage. Where a specific point has not been dealt with, this does not mean that these points are accepted, and they may be addressed further in the next deadline.

2 DEADLINE 4 SUBMISSION – CATEGORY 1 STAKEHOLDERS

2.1 OVERVIEW

2.1.1 The following stakeholders have submitted submissions at Deadline 4 with whom the Applicant is negotiating SoCGs:

- Nottinghamshire County Council
- Newark and Sherwood District Council
- Norwell Solar Farm Steering Group
- Environment Agency
- Historic England
- Natural England
- National Highways
- Cadent Gas Limited

2.1.2 Details of discussions with the SoCG parties are set out in the SoCGs. Those SoCGs submitted at Deadline 5 are listed in the table below, while the remaining SoCGs will be submitted at Deadline 6.

Table 2-1 SoCG Parties

SoCG Parties	SoCG Reference	Location of response to Deadline 4 submissions
Environment Agency (EA)	8.3D	SoCG
Cadent Gas Limited	8.9D	SoCG
Nottinghamshire Wildlife Trust	8.11C	SoCG
Norwell Solar Farm Steering Group	8.12D	SoCG

3 DEADLINE 4 SUBMISSION – CATEGORY 2 STAKEHOLDERS

3.1 OVERVIEW

3.1.1 The following stakeholders have provided submissions for which responses have been provided:

- Barry G D Walton
- Carlton-on-Trent Parish Council
- JPAG
- Laxton and Moorhouse Solar Concerns
- MKLTD Private Security Practice
- National Gas Transmissions PLC
- Ossington Solar Concerns

3.1.2 The Applicant noted the identical submissions made by BBS Law Ltd on behalf of Drone Defence Services Ltd [\[REP4-071\]](#) and Richard Gill [\[REP4-072\]](#). The Applicant's responses previously provided within the Position Statement address the points made by the Parties in their latest submissions insofar as they may be relevant to a potential interference with their property rights pursuant to the draft DCO. As such, the Applicant refers back to Appendix 2 of the **Responses to Deadline 3 Submissions [EN010162/APP/8.29]** [\[REP4-059\]](#) and does not comment further on the Parties' submissions here.

3.2 RESPONSES TO BARRY G D WALTON’S DEADLINE 4 SUBMISSION

Table 3-1 Responses to Barry G D Walton’s Deadline 4 Submission

Ref.	Summary Position of Interested Party	Applicant’s Responses
Barry G D Walton [REP4-080]		
<i>Flood Risk, Water and Drainage</i>		
1	<p><i>“My main concerns are flooding of the Trent Valley villages. I can see nothing of any significance that is put in place for the run-off from the Solar farms. As everybody is aware of the situation in all the Trent Valley villages from Gainsborough to Gunthorpe, it’s a problem and nobody has taken into consideration as from what I can see this situation. I should like to know who will compensate all the local villages for flooding created by the Solar forms as of yet I have not had anybody reply to any of my emails regarding this, I think if you speak to the local Drainage Board they’ve got a situation regarding excess water without any more being created.”</i></p>	<p>Please refer to the Applicant’s response as set out in Table 3-2 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at page 10.</p>

3.3 RESPONSES TO CARLTON-ON-TRENT PARISH COUNCIL'S DEADLINE 4 SUBMISSION

Table 3-2 Responses to Carlton-on-Trent Parish Council's Deadline 4 Submission

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
<i>Q2.2.14 Operational Noise</i>		
Pages 1-2	<p><i>"The assumption that baseline noise at Carlton-on-Trent is high due to the A1 is incorrect. While it is true that some properties experience a background noise those to the west of the A1 and the railway do not. There is some uncertainty regarding the adequacy and representativeness of the baseline noise monitoring conducted.</i></p> <p><i>Traffic along local routes, in particular the B1164 and Ossington Lane, is anticipated to increase, and peak HGV activity could raise background noise levels considerably. Given that parts of this road are relatively narrow, they are not ideally suited to frequent two-way HGV movements, which increases the risk of congestion, delays, and stop-start traffic. The traffic build-up will inevitably increase at times when the railway barrier is down, as a major line this is frequent, and vehicles have been known to wait for up to ten minutes before the barrier is lifted. Such conditions would not only hinder traffic flow but also raise noise levels,</i></p>	<p>The assessment locations for the noise-sensitive receptors were agreed with the EHO during the consultation process. As stated in Section 2.7 of the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2C] [REP4-031], NSDC agreed with the scope, methodology and assessment criteria of the ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055].</p> <p>The level of traffic as a result of the Development is not expected to significantly impact the traffic flow for the B1164 and Ossington Lane, and no significant construction traffic noise effects are identified in the ES Volume 2, Chapter 12: Noise and Vibration [EN010162/APP/6.2.12] [APP-055]. Please refer to the Applicant's responses on the traffic matter as set out within Table 3-3 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059] on pages 30 to 31.</p> <p>The operational noise from electrical plant within substations, as well as noise from the BESS battery containers and inverters have also been considered. No significant noise effects are anticipated, including on Carlton Wood. Please refer to the Applicant's responses on the biodiversity effect on Carlton Wood within Table 3-3 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>thereby further impacting the amenity of the local area.</i></p> <p><i>Further compounding this issue are the physical characteristics of the landscape. The corridor between Carlton-on-Trent and Ossington is open, with limited vegetation to provide acoustic screening – any planned hedge planting will not have effect during construction although will potentially assist during operational phase when maintenance vehicles can be expected.</i></p> <p><i>These effects are seen as compounded since Carlton-on-Trent has direct access between the A1 and then into the heart of the ‘doughnut’ connecting multiple development parcels and resulting in yet another negative impact on our community. Operational noise would therefore form part of a broader set of effects, which could intensify its overall significance.</i></p> <p><i>While the applicant has mapped a traffic management plan, we are aware that at times of road closures, sometimes unplanned such as flooding, it will not be possible to police drivers and prevent them from taking their own route. We have first hand experience of this each time there is a blockage on the A1, despite the weight restrictions through our</i></p>	<p>pages 19 and 20, reiterating that no significant impact has been identified on the species in Carlton Wood.</p> <p>The Applicant considers that the limits set in Requirement 15 were aligned to the levels assessed as set out in Tables A12.2.8 and A12.2.9 of the ES Volume 4, Appendix A12.2: Noise and Vibration Modelling [EN010162/APP/6.4.12.2] [APP-271]. The Applicant has sought to engage with the NSDC on this matter, and the discussion is detailed in Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2C] [REP4-031].</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>village lorries often ignore these when they single mindedly have their own goal to achieve.</i></p> <p><i>Additionally, operational noise from infrastructure such as inverters and battery storage units would not be contained locally can project over considerable distances, especially at night, increasing the likelihood of disturbance to humans and wildlife; emerging research has identified noise pollution from inverters (persistent humming or buzzing) as a potential cause of distress in residents living in close proximity to industrial sized solar farms. Carlton Wood is to have adjacent to it a substation – details yet to be provided; it seems incredulous to us that it is considered acceptable to even consider placing this structure here with negative impacts on wildlife. Noise pollution affects all types of life forms, including wildlife.</i></p> <p><i>We believe the applicant should review Requirement 15 to ensure that operational noise is effectively managed through a precise, robust, and location-specific approach that considers the sensitivity of the environment.</i></p> <p><i>As such, and while it may seem a futile exercise initially, we ask that background noise measurements and traffic flow analysis is taken</i></p>	

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<i>through the village at a central location, such as the Village Hall. Given the increased volume of traffic our community is anticipated to receive we do not feel this is too much to ask."</i>	
Question 6.2.1 Health & Well Being		
Page 2	<i>"Carlton on Trent Parish Council strongly agree with Sally Drew's Deadline 3 Submission1 and note that the 2kilometer (dropped to 2-mile by some) suggested World Health Organisation distance between a solar park and residential properties has not been met for Carlton-on-Trent residents. If this Solar Park is allowed to move forward and its outer boundaries are not adjusted, there will be a significant impact on the Mental Health and Wellbeing of all residents. The significant visual and adverse impact of turning 1765 hectares of what is currently farmland into an industrial landscape, the size of a large town, containing regimentally aligned solar panels should not be underestimated. The impact to all who wander out from the boundaries of the village, whether that be to walk their dogs, enjoy a countryside stroll, exercise, improve their mental health and wellbeing or even take a relaxing drive, will have their experience radically impeded. More</i>	Please refer to the Applicant's responses to Sally Drew's Deadline Submission within Table 3-9 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059] , at pages 91 to 92.

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<p><i>so, residents that currently have a direct and picturesque view of the countryside, specifically ALL residents of Carlton on Trent whose properties reside on the western edge of the village, will have their beautiful view of the rural landscape significantly and adversely impaired."</i></p>	
Question 8.2.1 Cultural Heritage & Archaeology		
Page 3	<p><i>"St Mary's Church Carlton-on-Trent. We do not agree with the decision made by the applicant that all heritage assets of Carlton-on-Trent should be seen as one. In addition to those listed we are also conscious of the unique buildings and history behind Stud Farm found to the west of the railway and the unique remains of Willoughby village and Hall (marked on the map as moat) and the historical inter relationship of this dwelling and the village settlement with Carlton-on-Trent. We disagree with the 'professional' claims made by the applicant. 'A11.2.7.1 St Marys Church (1178592) (and Carlton on Trent CA) 40 Professional judgement was applied in the decision to group the assets at Carlton on Trent and to include St</i></p>	<p>Given the extensive nature of the Development, and the number of assets within the Study Areas, grouping where appropriate was considered a proportionate way in which to undertake the scoping exercise. The heritage assets within the Carlton on Trent Conservation Area are set out in Figure A11.2.2G of the ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2B] [REP3-053], at page 191.</p> <p>With respect to the Church (1178592) and the individual assets within Carlton-on-Trent, the approach taken has been consistent with the methodologies set out in the ES Volume 4, Appendix A11.2 Heritage Settings Assessment Scoping Exercise [EN010162/APP/6.4.11.2B] [REP3-053] and in ES Volume 2, Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11] [APP-054], which themselves align with the relevant technical guidance issued by Historic England, and specifically with the guidance within The Setting of Heritage Assets,</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>Marys Church within this. ...The description of <u>'what matters and why'</u> for these assets relates specifically to their role <u>within the historic village</u> where their interests are appreciated. <u>None</u> of the assets within the conservation area were considered to have settings extending beyond the limits of the CA. (my bold)</i></p> <p><i>1 St Marys Church in Carlton on Trent derives its significance principally from its architectural and historic interests with some contribution made by it setting through the relationship to the community it served. ...The immediate surroundings provide the primary setting where the architectural and historic interests of the church can be appreciated. The spire of St Mary's Church is a landmark feature when viewed from the low-lying ground in the floodplain of the Trent to the east of Carlton but less prominent from the west as a result of the quantity of mature trees in the conservation area. The prominence and visibility of the church spire as a landmark within the wider area is not considered to be challenged by the Development, and this element of its historic</i></p>	<p>Good Practice Advice in Planning Note 2 (2nd Edition, 2017)¹ (as set out in those methodologies). There are some key points arising from the Methodologies use relating to the setting which are relevant here. Firstly, that "setting" is not a heritage asset and its importance lies in what it contributes to the significance of the heritage asset. Secondly, significance is the sum of the interests (archaeological, historic, etc.) which an asset may have. Thirdly, simple intervisibility with a given development is not in and of itself harmful; there must be a specific effect on the contribution made to the significance in respect of one or more of the interests from which that significance is derived.</p> <p>Regarding St. Mary's, the interests which most clearly contribute to its significance are its architectural and historic interests. The setting in which these can be most readily appreciated is within the churchyard itself, and within the village in which its lies (and as protected by the Conservation Area designation). The Applicant considers that the relationship of the church to the buildings and spaces within the churchyard and village, is part of what defines the character and appearance of the Conservation Area. Page 4 of the ES Volume 3, Figure 7.1: ZTV Study [EN010162/APP/6.3.7A] [AS-035] supports that a smaller extent of the Development is visible beyond the A1 road corridor to the east, and therefore less visible from St Marys Church. Potential visibility of the Development from St Mary Church is limited.</p>

¹ Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>.

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>and architectural interest is undiminished. Since the areas within the OL were not considered (using professional judgement) to form part of the surroundings within which the asset's historic or architectural interests were appreciated, <u>there was no mechanism for harm to the significance of heritage assets to occur and as such St Marys Church and the assets at Carlton on Trent were scoped out of the detailed assessment within the ES.</u> This judgement was informed by observations made during the Site visit, using modern aerial mapping, historic mapping, and the listing description. (my bold)</i></p> <p><i>We find the opening remark at paragraph 41 condescending, other points inaccurate. The 'professional judgement' of the applicant is shown to be wanting. St Mary's can indeed be seen from the east of the Trent valley; however, it can also clearly be seen from the B1164/Ossington Road, the Ossington to Norwell Road, from the properties at Park Lidgett, and from the Carlton to Norwell Road. In addition, it can be seen from all footpaths, one of these less affected than the others. The proposed panels in E4, E5, E6, E7, E8 and E9, and to a slightly lesser extent, E10 and E11 will impact on the view looking westerly towards</i></p>	<p>As this character is not changed, the role of the Conservation Area as a suitable setting for the church is not changed, and the contribution made by this setting is not diminished.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<p><i>Carlton and the view of St Mary's. Due to the height of the panels and to the increase in hedge height, the views of the spire will be severely compromised contrary to the applicant's claim of "not considered to be challenged by the Development"</i></p> <p><i>Having successfully demonstrated that the heritage assets of Carlton-on-Trent are not only integral within the centre of the village but also the outlying areas and the wider relationships within those outer limits, significant doubt is cast on the applicants claims. There is no justification for the applicant to have taken the decision not to scope St Mary's and all our heritage assets out of the detailed assessment within the ES"</i></p>	
Question 8.2.8 Ossington Airfield		
Page 4	<p><i>"Carlton-on-Trent Parish Council reiterate the points in their submission at Deadline 3 and support those of JPAG and NCC. The woods surrounding the airfield contain many points of interest, which are still being uncovered. As a child, one council member used to play in the woods and was frequently surprised as, yet</i></p>	<p>Please refer to the Applicant's responses on this matter as set out within Table 3-8 of the Responses to Deadline 3 Submission Report [EN010162/APP/8.29] [REP4-059], at pages 83 to 84. The Applicant considers that there is heritage value at the location, including a contribution made by those remains within the Order Limits. A Joint Statement on the Ossington Airfield has been prepared by the Applicant together with Nottinghamshire County Council (NCC), and sets out the position of the Parties with respect to the former RAF Ossington. Please</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<i>another structure would reveal itself out of the brambles."</i>	refer to Appendix 1 of the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1C] [AS-083].
<i>Question 9.2.2 Cumulative Assessment</i>		
Page 4	<p><i>"Carlton-on-Trent Parish Council wish to endorse the comments made by JPAG.</i></p> <p><i>The applicant has been keen to state that they "have followed the guidance". However, this advice is non-statutory.</i></p> <p><i>During ISH3 it was pointed out that current guidance was not written for a project of this size, and therefore the applicant should not only follow the guidance but pursue a process that could develop into revised guidance for such enormous projects as this.</i></p> <p><i>Alas to the contrary.</i></p> <p><i>The guidance states: "The scale and complexity of an NSIP may result in a complex cumulative effects assessment..."</i></p> <p><i>The applicant instead of carrying out a 'complex cumulative effects assessment', declared that any project already established</i></p>	<p>Please refer to the Applicant's responses on this matter as set out within Table 3-5 of the Responses to Deadline 3 Submission Report [EN010162/APP/8.29] [REP4-059], at pages 52 and 53. The responses direct the IP to the recent discussions with NSDC on cumulative visual effects and the Applicant's approach to ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1C], which are considered to have been prepared in line with the Planning Inspectorate's Advice on Cumulative Effects Assessment and the EIA Regulations.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<p><i>forms part of the baseline and therefore did not have to be considered.</i></p> <p><i>The same "light-touch approach" seen in other areas by the applicant.</i></p> <p><i>This certainly was a different, possibly unexpected, way of ... varying the approach to identifying and assessing 'existing and, or approved development'.</i></p> <p><i>Carlton-on-Trent supports the view of JPAG that their entire cumulative assessment process to be so fatally flawed that it cannot be relied upon."</i></p>	
Q11.2.7 Regional Landscape Change		
Pages 4 – 6	<p><i>"The applicant acknowledges that NSDC and the community are concerned 'about the ongoing landscape change at a regional level as a result of a series of consents and applications for solar farms'. [...]</i></p> <p><i>However, they state that this falls 'out the scope of cumulative assessment included within the LVIA for any individual project'. [...]</i></p> <p><i>Applicants should not be allowed to dismiss the cumulative impact of their development in this</i></p>	<p>The Applicant's submissions in relation to regional landscape change were made specifically in response to concerns raised about that topic, and covered the larger area being discussed by NSDC.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>way, or the rural nature of the area will be completely lost. [...]</i></p> <p><i>There needs to be some level of 'bigger picture' responsibility, or the area will be destroyed on a piece meal basis. [...]</i></p> <p><i>The applicant looks at the zones of influence and makes arbitrary decisions as to where their limits are set with the greatest being 10km, enabling them to ignore many developments which are impacting this region. [...]</i></p> <p><i>When challenged on the visual impact of the project zones become less significant and discuss changes across a much wider region. Thus, the siting of a solar farm the size of the present application will change the landscape fundamentally. [...]</i></p> <p><i>Though changes have taken place, historically, this part of the county has always been primarily farming, despite changes occurring beyond the 10km zone. [...]</i></p> <p><i>If the area of all the gravel sites in the county is added together, they amount to 57% of the proposed solar farm, which being concentrated in one place will be far more impactful. [...]</i></p>	

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>The same will not be true large scale solar farms – the visual in loss of green fields can only be compared to having all the pitheads and all the gravel sites concentrated in one area, BUT without mass job creation. [...]</i></p> <p><i>The switch to renewables has been embraced by the residents in this area with many solar farms appearing since the turn of the millennium, however, these have been small scale and less obtrusive. [...]</i></p> <p><i>The scale of this development has made the application unacceptable, especially when combined with others, creates a complete change from rural to industrial landscape. [...]</i></p> <p><i>Solar developments on the scale of Great North Road will change the landscape beyond recognition. [...]</i></p> <p><i>This is a choice, not a must; the same energy output could be achieved in other ways with far less change or impact to the local landscape. [...]</i></p> <p><i>In conclusion, Carlton-on-Trent Parish Council feels that the applicant uses a very tight 10km zone of influence when it suits but then uses a much bigger zone to state how the area has changed over time.[...]The cumulative effects of</i></p>	

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<p><i>solar development on regional landscape character should not be dismissed so easily; the change will be immense in an area that has altered very little throughout its history."</i></p>	
Q11.2.8 Hedgerow Removal on Decommissioning		
Pages 7-8	<p><i>"Carlton-on-Trent Parish Council does not agree with the removal of any hedges, they are a vital corridor for wildlife forming an integral part of England's pipeline for nature. Hedges with or without trees are encouraged as part of the Governments bid to combat climate change; it seems to us entirely counter productive to remove any trees or hedges as part of this project". [...]</i></p> <p><i>"The removal of the secondary hedgerows at decommissioning would have significant impacts on the local landscape, hedges created as a consequence of this project, do not need to be thought of as a temporary 40-year structure. Hedgerow planting in practice would develop into an established feature that contributes to the field structure, enclosure, and visual coherence. Consequently, these features would become an integral evolving environmental landscape character.</i></p>	<p>The Applicant agrees with the Parish Council that hedgerows are a priority habitat and should be protected. Majority of the existing hedgerows will be retained in their current position in line with the programme set out at pages 19 to 22 in the ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1E].</p> <p>The secondary hedgerows are those that are proposed as part of the Development that would be planted alongside proposed permissive access routes, creating a double boundary to a field. Once the permissive routes are removed at decommissioning, 'second hedgerows' are assumed to be likely to be removed to allow the full size of the fields to once again be used for agriculture. As such, the Applicant does not consider that the removal of secondary hedgerow at decommissioning would have significant impacts on the local landscape, in fact, this measure is intended for the land to be reinstated to original condition.</p> <p>In relation to the proposed hedges in Field 8, the hedgerow planting will be carried out in line with the ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1E], which includes measures for the proposed hedgerow to be maintained at an appropriate height and</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>Removal of these hedges will not restore the original and current boundaries, the hedges the applicant seeks to remove during construction. The boundary features are essential for visual amenity and the quintessential field pattern, the applicant currently seeks to allow these hedges to grow taller, to remove them at decommissioning is not essential and would be detrimental to wildlife, it is our belief that hedges should remain but be reduced in height to reinstate lost views.</i></p> <p><i>Retaining well established hedgerows would represent a more appropriate and sustainable approach, ensuring that the landscape develops in a manner that supports long-term stability of character. This strategy would avoid unnecessary and avoidable harm at the conclusion of the scheme's operational lifespan.</i></p> <p><i>In addition to offsetting carbon production and increasing biodiversity, hedges as are all trees, beneficial in alleviating flood risk. In E8 second hedging is alongside the railway and a permissive route, E8 is known to flood. What is not clear is how far into the field the hedge is to be planted, consequently how much land would effectively be removed from future farming</i></p>	<p>dimension. ES Volume 4, Appendix A5.1.1: oLEMP Appendix [EN010162/APP/6.4.5.1.1B] present the illustrative design, which would be confirmed through the detailed LEMP. Requirement 8 of the Draft Development Consent Order [EN010162/APP/3.1F] secures that the detailed design would be subject to consultation with affected properties, and the final approval would be from NSDC.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<i>practice should this remain, that said to retain this hedge would assist in the uptake of water and the alleviation of flooding. [Species selection essential].” [...]</i>	
Q12.2.2 Site Selection		
Page 8	<i>“Carlton-on-Trent Parish Council wishes to reiterate the comments made in REP3-104, and draw attention to the evidence submitted previously in REP1-072. ”</i>	The Applicant has responded to the concerns raised in relation to the site selection process, which was provided within Table 4-11 Principle of Development of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115] , on page 327.
Q13.2.2. Surface Water Concerns		
Pages 8-9	<i>“There has been no further discussion beyond the disappointing meeting held on Sunday 8th February. I have attached the email exchange that followed, with an update since 18.02.26. Ref: CoT email to Raincloud.” [...]</i> <i>Four members of the Council turned out plus the clerk to meet the applicant, we had previously explained that a site meeting would be necessary, however the applicant stated he had been prior to the meeting and declined to go; the intention was that we showed him</i>	The Applicant considers that the flood model parameters for Carlton on Trent are based on the best available dataset and have taken into account the topography and drainage layout. The modelling assessment is robust and produces flood extents which show a good correlation with the Environment Agency’s pluvial flood dataset ² . All Work Area 1 has been removed from Flood Zone 3. As shown in Figure A9.1 of the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] , Field E8 is located outside of the Flood Zone 3. As such it is not in conflict with the EA guidance. All agreements have been reached with the EA as noted

² Environment Agency (2025) Risk of flooding from surface water-understanding and using the map. <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map/risk-of-flooding-from-surface-water-understanding-and-using-the-map>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<p><i>areas of concern, idiosyncrasies caused by topography and unusual drainage layout that don't appear on modelling schedules but locals are aware can have significant impact."</i></p> <p><i>We do not agree with the summary at Action point 28.</i></p> <ul style="list-style-type: none"> <i>Much is hidden behind the jargon. Section of Work Area 1 removed refers to half of the field E8 known as Low Moor, half E8 is still in the scheme despite it flooding as shown on the Flood zone map (Ref: CoT.FZ attached). We were told that this had been 'modelled' with panels suited to standing in water. This contradicts the advice given by the Environment Agency who informed us 'The applicant needs to commit to not placing construction material or equipment within Flood zone 3' (letter attached EA response [sic]).</i> 	<p>in the Final Statement of Common Ground with the Environment Agency [EN010162/APP/8.3D].</p>
Page 9	<ul style="list-style-type: none"> <i>Although we were told things were "modelled for" we were never given any explanation of what that entailed. How would this 'modelling' differ to a field at Bilsthorpe for example – we understand it is the same therefore there is no specific 'modelling'.</i> 	<p>Modelling is the computer simulation, which applies a rainfall volume to surface topography, to provide a better understanding of the prevailing flood risk to the Site and how this might be impacted by any development. Such modelling had been derived from the best currently available information on flooding. The modelling results would differ to other survey areas based on the variations of the modelling factors.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
Page 9	<ul style="list-style-type: none"> <i>We asked very specifically what flood mitigation was planned for our area, what SuDs would be put into practice. No answer was given other than we were told that grass would hold back the water better than crops as the land is rough. The land shown in photographs submitted REP3-104 was 'rough', in some it was ploughed, a form of SuDs; it is disingenuous of the applicant to say that grass land will retain the water better. This statement would depend on many factors, soil type, topography, outlying drainage, type of grass... (cereals are grasses!)</i> <i>The applicant acknowledged that not all grass was good at retaining water, commenting that Egmanton was not a good example (not verbatim, this was linked with a comment about sparseness), when asked what seed mix would be used this was not known.'</i> 	<p>The Applicant does not agree that no response has been provided to address the flood mitigation matter. The Applicant's responses are set out in the previous reports listed below, all of which suggest that there is no evidence that the Development, with its associated mitigation measures, would result in pluvial flood risk or exacerbate the existing surface water flooding issue. In fact, the works could provide opportunities to improve soil structure and drainage during reinstatement, rather than leaving land undisturbed and compacted.</p> <p>Therefore, there is no village-specific drainage strategy proposed for Carlton on Trent. Measures to limit the existing flooding issues in Carlton on Trent are being brought forward via the NG+ fund mechanism, which is separate from the application for the DCO for the Development.</p> <ul style="list-style-type: none"> • Tab 3-3 of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], pages 18-19 • Table 4-3 of the Responses to Deadline 1 Submissions [EN010162/APP/8.21] [REP2-116], pages 170-175 • Table 3-3 and Table 3-6 of Responses to Deadline 2 Submissions [EN010162/APP/8.23] [REP3-098], pages 34- 35, 54-55 • Table 3-3 of Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], pages 12-17
Page 9	<ul style="list-style-type: none"> <i>We highlighted that should the project go ahead we understood panels would be fitted this time next year, this was agreed;</i> 	<p>Please refer to the Applicant's responses on the grass seed planting matter in Table 3-3 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at pages 15 and 16. Measures to</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<p><i>this meant grass seed would need to be drilled this coming winter/spring season, this was agreed, which would mean crops would be no more advanced that at present and machinery would be destroying the grass during construction. This would mean grass cover would be sparse. No satisfactory answer was given.</i></p>	<p>manage and monitor runoff and soil quality are secured in the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3D] [REP4-017], which would minimise construction disturbance on the grassland.</p>
Page 9	<ul style="list-style-type: none"> <i>We asked specifically about E9 & E7, both identified as being heavily panelled, both on an easterly slop already known to flood – again there was no indication of any planned mitigation.</i> 	<p>Please refer to the Applicant's responses on the flood risk matter in Table 3-3 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at pages 13 and 14. The Applicant maintains the position that there is no evidence to indicate that the Development with its associated mitigation measures would exacerbate this situation in field E9 and E7, and they are not subject to pluvial flood risk.</p>
Page 9	<ul style="list-style-type: none"> <i>The applicant maintained that arable caused compaction of the soil and increased run-off. This is untrue. If land was compact then crops would not grow as shown in wheelings (tractor tracks in fields); this is a modicum of the field surface area compared to sheep grazing impacting soil, with no breaking up of the pan (hard crust), as mechanical means cannot get between the panels</i> 	<p>Please refer to the Applicant's responses to the matter on soil compaction in Table 3-6 of the Responses to Deadline 2 Submissions [EN010162/APP/8.23] [REP3-098], at pages 54 and 55.</p> <p>Regarding the statement of double cropping, the Applicant can clarify that there are various agri-environmental schemes across the Order Limits. These can include winter cover planting, for bird feed or soil benefits.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
	<ul style="list-style-type: none"> <i>The applicant maintained that some fields produced two crops each year making compaction even worse. We dispute this – there is only one summer in our British calendar, so it is not possible to have two crops. We do not know of a crop that grows in 6 months and would like the applicant to tell us if they are aware of any</i> 	
Page 9	<ul style="list-style-type: none"> <i>We do not understand what is meant by “the current flow pathways from Field E6 and that they correlate with the Raincloud modelled 2D rainfall pathways” if we did discuss this as the applicant suggests, then we would know more; no explanation or suggestions were given as to how the panel arrangement would or would not increase/affect water flow, or about the modelled 2D. We find this comment misleading.</i> <i>Regarding E6 – we dispute that this is currently suffering from compaction.</i> 	<p>It is noted in the Applicant's responses to action point 28 in the Written Summary of Oral Submissions from Issue Specific Hearing 3 and Response to Action Points [EN010162/APP/8.26] [REP3-101] that <i>“Both parties also discussed the current flow pathways from Field E6 and that they correlate with the Raincloud modelled 2D rainfall pathways. The Applicant explained that Field E6 is currently tilled and compacted and is leading to runoff which flows to the east. Work Area 1 will be sown with grass and will promote retention of surface water for longer compared to the baseline scenario.”</i></p> <p>The response suggests that it is agreed that the current soil condition in Field E6 is compacted, which leads to surface water runs off towards the east. However, the modelling presented within the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] identifies that after grass and vegetation planting is provided without and around the PV arrays in Field E6, the surface water runoff will be slower compared to the current situation. Figure 9.7A and 9.7B of the ES Volume 4, Appendix A9.1: Flood Risk</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
		<p>Assessment [EN010162/APP/6.4.9.1C] [REP3-050] suggests that Field E6 is not subject to pluvial flood risk.</p>
Page 10	<ul style="list-style-type: none"> <i>We asked were the substation previously identified as going south of E8 had been moved to, the applicant didn't know. We surmised that it had been removed due to flooding and queried why this had ever been considered, given that no land at risk of flooding was supposed to be in the scheme. When I muted was this because the Flood maps had changed (March 2025) I was told "no".</i> 	<p>As set out in Section 8.2 of the Design Approach Document [EN010162/APP/5.6B] [REP2-019], design changes were made at post PEIR stage in light of the EA's new dataset (Trent and Tributaries 100-year plus Climate Change event, and the Flood Map for Planning Present Day Extents) to ensure that the Development would not located within Flood Zone 2 and 3. This includes removing both the substation and solar PV from the field at the south of E8.</p>
Page 10	<ul style="list-style-type: none"> <i>There was a discussion regarding the use of NG+ to provide flood alleviation measures, we didn't believe this is what the money was for, we informed the applicant that previously we had been told we would not be part of any scheme as we had not signed up to the NG+ fund.</i> 	<p>The Applicant is unclear towards the source of this piece of information. As recorded in the Applicant's previous responses to the Parish Council and in the hearings, the Applicant is always open to continuing the conversation with the Parish Council on the flood alleviation measures through the NG+ fund. Prior to the NG+ fund becoming active, the Parish Council had also been active on some natural flood management measures.</p>
Page 10	<ul style="list-style-type: none"> <i>The applicant acknowledged that solar panels <u>did increase water running off the fields</u> as acknowledged through the need to input flood mitigation measures.</i> 	<p>The Applicant does not accept this assertion.</p> <p>The Applicant outlined that studies showed that runoff from PV areas would only increase if the area under the PV arrays was not vegetated.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council	[REP4-061]	Please refer to the Applicant's responses on this matter as set out within Table 3-3 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059] , from pages 16 to 17.
Page 10	<ul style="list-style-type: none"> <i>We asked what other mitigating measures were planned, such as scrapes, bunds, gulleys/ditches... We were told scrapes were being considered in areas such as Maplebeck, a discussion ensued regarding the need for ongoing maintenance (we got the impression this would not be the applicant's responsibility). All agreed scrapes would not work around us as there would be nowhere for the water to drain.</i> <i>It was acknowledged the ground was already saturated and though we had experienced consistent rainfall this had not been excessive, even so the ground was saturated (the applicant showed us an image he had taken that morning at E2). It was agreed bunds would therefore be full and would not serve as mitigation. Likewise, ditches would not be of any help as there would be nowhere for the water to go as dykes and the Trent were already relatively high.</i> 	<p>The proposed wildlife scrapes have been carefully designed to ensure that the habitats are designed to improve biodiversity and minimise flood risk following the consultation with NCC and the EA. As set out in the ES Volume 4, Appendix A5.1.1: oLEMP Appendix [EN010162/APP/6.4.5.1.1B], no scrapes intervention (LEMP habitat 24) is proposed in Carlton-on-Trent, including Field E2. No scrapes are proposed in Maplebeck either. The Applicant considers that the proposed scrapes are appropriate, and the intervention would have no effects on Carlton on Trent.</p> <p>The habitat intervention programme is set out in ES Volume 4, Appendix A5.1: Outline LEMP [EN010162/APP/6.4.5.1E], at pages 56 to 57. The Applicant is responsible for the implementation, management, monitoring and remediation of the wildlife scrapes. Such commitment is then secured by Requirement 8 of the draft DCO [EN010162/APP/3.1F].</p> <p>The Applicant has also provided a brief response to this matter within Table 3-3 of the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at page 16.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]		
Page 10	<ul style="list-style-type: none"> <i>We had expected the applicant to bring information regarding the substation we can expect to see adjacent Carlton Wood, an Ancient Woodland; at the ISH3 alarm bells were sent ringing as we became aware this was potentially not going to be as we were previously told. No design was brought; however, we were assured the information would be passed on and the clerk would receive something the next day.</i> <i>This didn't happen and so we emailed – see email attached updated since 18.02.26 (CoT email to EG re substation). We have had no further communication despite being told our queries would be answered.</i> <i>We are struggling to understand how it can be considered acceptable to site a structure of the magnitude of these substations (we don't know exactly which one) in this location, with country roads and ancient wood lands around it, notwithstanding the fact there is a substation between the level crossing and the A1 slip road. This proposal should be reconsidered or subjected to a thorough review.”</i> 	<p>As outlined in Written Summary of Oral Submissions from Issue Specific Hearing 3 and Response to Action Points [EN010162/APP/8.26] [REP3-101], the purpose of the meeting was to discuss concerns the Interested Party has on flooding.</p> <p>The illustrative design for the intermediate substation near Carlton Wood was submitted with the application, and the dimensions and layout of the substation are secured within the Concept Design Parameters and Principles [EN010162/APP/7.14D]. The Draft DCO [EN010162/APP/3.1F] then secures that the detailed design of the Development that is submitted for approval by the LPA must accord with the commitments in the Concept Design Parameters and Principles [EN010162/APP/7.14D]. Please refer to the Applicant's responses on this matter, as set out within Table 3-3 in the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], from pages 34 to 35.</p> <p>Illustrative elevations of the substations are also shown on the Figure 5.12 in ES Volume 3, Chapter 5 Development Description Figures 6.6 – 5.21 (Part 3 of 3) [EN010162/APP/6.3.5C].</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Carlton-on-Trent Parish Council [REP4-061]	<ul style="list-style-type: none"> • <i>“A discussion took place regarding the need to protect the woodland, questions were asked about the damage the cabling would cause, the effects of having a ‘mini power station type structure there.</i> • <i>It was acknowledged there would be an effect on the wildlife with the likelihood that some would be displaced during construction. This being the case how would wildlife return given the area was to be fenced. Carlton Wood has been excluded from any scoping or assessment related to the scheme by encasing it in a redline within the redline of the project!!! How can this be acceptable?” [...]</i> 	<p>Please refer to the Applicant's responses the concerns raised on the biodiversity effect on Carlton Wood, as set out within Table 3-3 in the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], from page 20 to 21, and within Table 3-3 of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 23.</p>

3.4 RESPONSES TO JPAG 'S DEADLINE 4 SUBMISSION

Table 3-3 Responses to JPAG's Deadline 4 Submission

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]		
<i>Ossington Airfield</i>		
Pages 1 - 2	<p><i>“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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>A Joint Statement on the Ossington Airfield has been prepared by the Applicant together with NCC, and sets out the position of the Parties with respect to the former RAF Ossington. Please refer to Appendix 3 of the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1C] [AS-083].</p> <p>Both the Applicant and NCC accept that the asset is a non-designated heritage asset and the Applicant considers this to be of local/county importance. There is the potential for some harm to the archaeological interest in the Airfield, but this is mitigated appropriately in line with the ES Volume 4, Appendix A11.8: Outline Archaeological Mitigation Strategy (AMS) [EN010162/APP/6.4.11.8C] [REP4-023] process, with an emphasis on retaining in situ the remains of WWII structures. The applicant accepts that there is a limited degree of harm to the significance of the asset through change within its setting, and considers that off and on-site enhancement could provide a means to allow the significance of the Airfield to be better realised and appreciable to visitors to the area. Enhancement may include the provision of information boards, and aligning that to the permissive path proposed through part of the former Airfield site (and along the southern boundary of the Order Limits). Content and siting of such boards is an area where community engagement could be practically undertaken.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>Paragraph 5.9.34 of NPS EN-1 recognises that “In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”</p> <p>Paragraph 2.10.152 of NPS EN-3 states that: “Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.”</p> <p>As concluded in Section 6.13 of the Planning Statement [EN010162/APP/5.4C] [REP3-018], the Development is temporary in nature, and that there are not likely to be any direct and indirect effects on the significant of heritage assets with the mitigations secured in the ES Volume 4, Appendix A11.8: Outline AMS [EN010162/APP/6.4.11.8C] [REP4-023]. As such, the Applicant’s approach to the non-designated heritage asset is appropriate.</p> <p>ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4] [APP-047] has demonstrated that the Applicant has adopted an iterative design process to optimise the Development layout, including refinements made to avoid BMV agricultural land and any land which is the subject of a landscape designation. As such, the removal of solar panels on the airfield is not necessary.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>Also, the area 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.</i></p> <p><i>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.</i></p> <p><i>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."</i></p>	
Cumulative Effects		
Pages 3 - 4	<p><i>"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</i></p>	Noted.

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>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.</i></p> <p><i>[Refer to image in the submission]</i></p> <p><i>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.”</i></p> <p><i>[Refer to image in the submission]</i></p>	
Pages 5-7	<p><u><i>Electricity Transmission Lines</i></u></p> <p><i>“The West Burton to Ratcliffe-on-Soar Refurbishment Project includes land within the GNR Order Limits.</i></p> <p><i>[Refer to image in the submission]</i></p> <p><i>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</i></p>	<p>Please refer to the Applicant's responses on this within Table 3-4 in the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at pages 48 to 51. The Applicant has proactively engaged with NGET to understand their plans, identify where projects overlap, and make a common ground. The latest discussion with NGET is also set out in the Draft Statement of Common Ground with National Grid Electricity Transmission [EN010162/APP/8.7C] [REP4-041].</p> <p>The likelihood of significant cumulative environmental effects is negligible, and the ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1C] will be updated at Deadline 6 to include the SCRE/WRRE Project in the long list.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>land rights necessary to refurbish infrastructure between West Burton, High Marnham, Stoke Bardolph and Ratcliffe-on-Soar³.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	

³ 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/westburton-to-ratcliffe-on-soar>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>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.</i></p> <p><i>This project adds to the cumulative impact, particularly in relation to construction impacts relating to traffic.</i></p> <p><i>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.</i></p> <p><i>There has been public consultation and publicity on the NGET Brinsworth to High</i></p>	

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>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."</i></p>	
Pages 7 - 9	<p><u><i>H2 East Pipeline</i></u></p> <p><i>"On the 3 March 2026 early consultation on another NSIP scheme opened, this is the H2 East Hydrogen Pipeline⁴. This is intended to run from Humber to Nottinghamshire, or more precisely from Immingham/Killingholme to Newark.</i></p> <p><i>[Refer to image in the submission]</i></p> <p><i>The Secretary of State issued a section 35 direction on the same day making this project an NSIP scheme.</i></p> <p><i>The route of the proposed pipeline in its Nottinghamshire stretch will run through the</i></p>	<p>Following the most recent planning search for the project (on 15 April 2026), H2East Pipeline is now registered on the PINS website and the scoping opinion has been published on 13 April 2026. On this basis, the Project would be classified as Tier 3, and the ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1C] will be updated at Deadline 6 to include this. In advance of carrying out this update, the Applicant maintains the position that <i>"assuming the pipeline would be buried, if such a pipeline project were to proceed in the vicinity of the Development, the potential cumulative effects would be during the construction stage only, and only if the construction stage of the two projects overlapped. The Development construction phase is expected to be completed by c. 2029, whereas the H2East project DCO process itself is expected to last until 2031, with a period beyond that before construction starts. There is therefore no potential for cumulative effects of the Development against</i></p>

⁴ <https://h2east.co.uk/>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>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).</i></p> <p><i>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.</i></p>	<p><i>a baseline including H2East.” Please refer to the Applicant’s responses on this within Table 3-8 in the Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at pages 82 to 83.</i></p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>The proposed route would appear to impact on the following 25 Nottinghamshire Parishes:</i></p> <ul style="list-style-type: none"> • <i>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.</i> <p><i>HAGIs are proposed to potentially impact on the following Nottinghamshire Parishes:</i></p> <ul style="list-style-type: none"> • <i>Averham, Kelham, South Muskham</i> • <i>Egmanton, Kirton, Wellow, Laxton and Moorhouse, Ompton</i> • <i>Marnham, Normanton on Trent, Weston</i> <p><i>(Note – the parishes highlighted in red are also impacted by GNR Solar)</i></p> <p><i>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</i></p>	

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>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 Egmanton solar and the permitted Tuxford Road Solar and the proposed One Earth solar project.</i></p> <p><i>[...]</i></p> <p><i>[Refer to image in the submission]</i></p> <p><i>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..”</i></p>	
Page 10	<p><u><i>Norwell Foxholes Grid Connection</i></u></p> <p><i>“A recent court case⁵ 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</i></p>	<p>For Great North Road, the Environmental Statement presents an assessment of the Development, which includes the grid connection, along with the solar PV modules, energy storage, and associated development infrastructure, together with biodiversity enhancements. The details of Work Areas are provided in ES Volume 2, Chapter 5: Development Description [EN010162/APP/6.2.5] [APP-048].</p>

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

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>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.”</i></p>	<p>Staythorpe BESS falls under Work no. 7: Consented Staythorpe BESS and Connection as defined by Schedule 1 of the Draft DCO [EN010162/APP/3.1F], and has been taken into account in the EIA.</p>
Pages 10-12	<p><u><i>Staythorpe Power Station Carbon Capture and Storage</i></u></p> <p><i>“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:</i></p> <ol style="list-style-type: none"> <i>1. RWE submits an initial application to DESNZ (Department for Energy, Security and Net Zero)</i> <i>2. DESNZ will consider if the application is suitable for publication.</i> <i>3. RWE will publish the application on its website, advertise it and send it to all relevant stakeholders and the local planning authority.</i> <i>4. The deadline for representations will</i> 	<p>The Staythorpe CCS s36c variation project (Ref: 24/00086/DCO) was considered in the ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1C], as set out within Table A2.1.1, at page 4. Based on the limited information available on the Staythorpe Power Station CCS project at the time the cumulative assessment was prepared at the application [APP-191], and in a revised version in January 2026 [REP2-042], no significant cumulative impacts were anticipated. However, the Staythorpe CCS Project website, published on 24 February 2026⁶, RWE submitted an application to vary the existing Section 36(1) consent of the Electricity Act 1989 for Staythorpe Power Station in February 2026. ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1C] will be updated at Deadline 6 to include this. The works required sought to be authorised includes key components to enable the retrofit of a post-combustion carbon capture plants to the Power Station. As noted in the Project’s Section 36 Supporting Statement⁷, at paragraph 2.14, construction of the Project is expected to commence in 2031 and last for 4.75 years and would therefore not overlap with the GNR project. There would therefore be no cumulative effects associated with simultaneous construction activities on both</p>

⁶ <https://staythorpeccs.com/downloads/>

⁷ Staythorpe CCS Section 36 Supporting Statement

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>generally be 28 days after publication of the last notice.</i></p> <p><i>5. The relevant planning authority is given 2 months after service of the variation application documents to comment.</i></p> <p><i>6. Before determining a variation application, the Secretary of State may cause a discretionary public inquiry to be held.</i></p> <p><i>7. A decision will then be made by the Secretary of State to approve the variation.</i></p> <p><i>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.</i></p> <p><i>[Refer to image in the submission]</i></p> <p><i>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.</i></p> <p><i>The Staythorpe CCS was already on our original set of cumulative impact maps, it is</i></p>	<p>schemes. The potential for cumulative effects of the Development (GNR) from the overlapping operational phases of the two schemes will be assessed in revised Environmental Statement chapters on landscape/visual, heritage, ecology and noise to be submitted at Deadline 6.</p> <p>ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1C] will be updated at Deadline 6 to reflect any planning updates to the long list and short list of cumulative developments. Relevant environmental statement chapters will also be updated to reflect the changes to the cumulative assessment as required following the updates to the review of Stages 1 and 2.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]		
	<p><i>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.</i></p> <p><i>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."</i></p> <p><i>[Refer to image in the submission]</i></p>	
Cumulative Effect Assessment		
Pages 12- 14	<p><i>"[...] 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.</i></p> <p><i>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</i></p>	<p>The advice referred to by JPAG relates not to other developments, but to the interrelationships between different types of effect that could affect the same receptor, such as effects of construction traffic on users of roads and effects during construction on users of Public Rights of Way. This advice is fully applied and described in ES Volume 2, Chapter 19: Interrelationships [EN010162/APP/6.2.19] [APP-062].</p> <p>The Zone of Influence, for a given environmental topic, is established by the maximum distance at which non-negligible effects could occur. This varies between topic and effect type, but in all cases is substantially larger, typically many times larger, than the distance at which significant effects are anticipated. There is no justification for using a Zone of Influence that is larger than the potential range of influence.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>cumulative effect of several non-significant effects could be significant.'</i></p> <p><i>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"</i></p>	
Page 14	<p><i>"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.</i></p>	<p>The approach to the assessment of the main and likely significant environmental effects, including the potential for cumulative effects, has been prepared in accordance with the PINS advice note and good practice. The EIA has had appropriate regard to relevant existing and planned developments.</p> <p>For example, in the LVIA chapter, section 7.9 of ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] [REP2-022] refers to how existing and consented development has been considered at paragraph 309.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]		
	<p><i>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.</i></p>	
Page 14 - 15	<p><i>“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.”[...]</i></p>	<p>The Applicant has provided a response on this matter at the row above, on page 39.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]		
Page 15	<p><i>“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.”</i></p>	<p>Please refer to the Applicant’s response on this matter within Table 3-32 of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], on page 256. To reiterate, Staythorpe Power Station is an existing and operational land use. As such, it has been considered in the EIA as part of the baseline to which the Development is proposed to be added.</p> <p>Southwell Racecourse is included in the long list of the ES Volume 4, Appendix A2.1: Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1C]. It has not been progressed to stage 2 because the Site is less than 5ha, so the cumulative effect is unlikely. The sugar beet factory is an existing and operational land use. As such, it has been considered in the EIA as part of the baseline to which the Development is proposed to be added.</p> <p>The Applicant considers that the assessment has been prepared in line with the Planning Inspectorate’s Advice on Cumulative Effects Assessment and the EIA Regulations. Section 2.12 of the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2C] [REP4-031] stated that NSDC confirmed at Deadline 3 that they agree with the long list that has been presented by the Applicant and the list of developments that have been shortlisted for further assessment. Latest discussion on this matter with NSDC will be provided within the revised SoCG at Deadline 6.</p>
Page 15	<p><i>“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</i></p>	<p>The Development is not in conflict with the case law. Please refer to the Applicant’s responses provided at the row above, on page 40-41.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]	<p><i>recent court case⁸ 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”</i></p>	
Page 15	<p><i>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</i></p>	<p>As set out by the Applicant during ISH1, different environmental topics may take different approaches to cumulative effects depending on the policy or regulations that their topic needs to address, and the mechanism for causing effects. Proposed large housing developments (including in Mansfield) are included on the basis that they could lead to a change in the amount of temporary accommodation available for workers on GNR. Schemes that are already under construction are unlikely to overlap with GNR's construction phase and hence would not affect the cumulative baseline of available accommodation. Section 2.12 of the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2C] [REP4-031] stated that NSDC confirmed at Deadline 3 that they agree with the long list that has been presented by the Applicant and the list of developments that have been shortlisted for further assessment.</p>

⁸ Raeshaw Farms Ltd v Scottish Ministers & Energiekonitor UK Ltd [2026]

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]		
	<p><i>construction on the eastern side of Edwinstowe has not been assessed.</i></p> <p><i>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"</i></p>	
Q11.2.3 Use of summer photograph in viewpoints		
Page 16	<p><i>"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 'worstcase scenario' for screening, while summer views show maximum vegetation filtering. Such a dual approach accurately assesses changing visibility throughout the year.</i></p>	<p>The Applicant considers that the potential for greater visibility in winter has been considered in all aspects of the ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment (LVIA) [EN010162/APP/6.2.7A] [REP2-022] and illustrated in the visualisations provided. Please refer to the Applicant's responses to ExQ11.2.3 of the Responses to ExA's Second Written Questions [EN010162/APP/8.30] [REP4-060], at page 52.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]		
	<p><i>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.”</i></p>	
<p>Q11.2.5 The assessment of regional landscape change</p>		
Page 17	<p><i>“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.”</i></p>	<p>The Applicant has provided additional information within ES Volume 4, Appendix A7.5: Non-Significant Effects [EN010162/APP/6.4.7.5A] [REP3-044] in agreement with NSDC. This relates to further details on the Sequential assessment for the main routes through the LVIA study area (A1, East Coast Main Line, A616, A617, Robin Hood Way). Additional responses in the technical note are also provided within Appendix A of the Written Summary of Oral Submissions from Issue Specific Hearing 3 and Response to Action Points [EN010162/APP/8.26] [REP3-101].</p> <p>NSDC and the applicant have now reached an agreement that the cumulative assessment provided within the LVIA meets the relevant guidance as reported in the Draft Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2D].</p> <p>Please also refer to the Applicant's responses to the JPAG's Deadline 2 Submission at pages 89 to 90 of the Responses to Deadline 2 Submissions [EN010162/APP/8.23] [REP3-098].</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
JPAG [REP4-074]		
Q11.2.7 The evolving character of the regional landscape		
Page 20	<p><i>“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.”</i></p>	<p>The Applicant does not accept that the scale of Development is disproportionate. The size of the development has been carefully considered, balancing the need to maximise the grid capacity whilst also making the most efficient use of the land and avoiding unacceptable impacts. Please refer to the Applicant’s responses set out within Table 4-11 of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], at page 331.</p>
Page 20	<p><i>“The applicant misunderstands the landscape due to a lack of local knowledge or understanding of the landscape in which the scheme is proposed.[...]”</i></p>	<p>In addition to having undertaken baseline studies and site visits, and attended public consultations during preparation of the LVIA – sufficient to inform an understanding of the landscape, Mary Fisher (who worked on the LVIA and has been acting as landscape expert witness) is also a former resident of Newark-on-Trent and prior and after that lived in several locations within a 17 mile radius of Newark-on-Trent (in Nottinghamshire and Lincolnshire) for 24 years of her adult life. She has also worked on previous landscape design projects and LVIA’s in the region. As such, it should be noted that the ES Volume 2, Chapter 7:</p>

Ref.	Summary Position of Interested Party	Applicant's Responses						
JPAG [REP4-074]		<p>LVIA [EN010162/APP/6.2.7A] [REP2-022] was prepared by specialists who both hold appropriate professional qualifications and experience in this matter and have additional local knowledge of the landscape as a former long-term resident.</p>						
Page 21 to 24	<p>The GNR project lies within National Character Area: 48 - Trent and Belvoir Vales. JPAG refers to the description of NCA provided by Natural England.</p> <p>JPAG also refers to that Natural England identify the landscape opportunities for Trent and Belvoir Vales NCA. The list is set out in page 23 of their submission.</p> <p>JPAG then concluded with the following comments:</p> <p><i>“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</i></p>	<p>There is no requirement for development to contribute to the opportunities identified. The development would contribute to the opportunities identified as follows:</p> <table border="1" data-bbox="1032 655 2054 1318"> <thead> <tr> <th data-bbox="1032 655 1563 762">'Opportunity' identified in NCA description</th> <th data-bbox="1563 655 2054 762">GNR contribution</th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 762 1563 948"><i>Conserve the rural settlement pattern by ensuring that new development is complementary to intrinsic local character</i></td> <td data-bbox="1563 762 2054 948">GNR would not affect the settlement pattern.</td> </tr> <tr> <td data-bbox="1032 948 1563 1318"><i>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</i></td> <td data-bbox="1563 948 2054 1318">GNR would use locally characteristic materials in the construction of buildings (as part of substations) but does not comprise a form of development that would be locally characteristic within the curtilage of settlements.</td> </tr> </tbody> </table>	'Opportunity' identified in NCA description	GNR contribution	<i>Conserve the rural settlement pattern by ensuring that new development is complementary to intrinsic local character</i>	GNR would not affect the settlement pattern.	<i>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</i>	GNR would use locally characteristic materials in the construction of buildings (as part of substations) but does not comprise a form of development that would be locally characteristic within the curtilage of settlements.
'Opportunity' identified in NCA description	GNR contribution							
<i>Conserve the rural settlement pattern by ensuring that new development is complementary to intrinsic local character</i>	GNR would not affect the settlement pattern.							
<i>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</i>	GNR would use locally characteristic materials in the construction of buildings (as part of substations) but does not comprise a form of development that would be locally characteristic within the curtilage of settlements.							

Ref.	Summary Position of Interested Party	Applicant's Responses	
JPAG [REP4-074]	<p><i>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”</i></p>	<p><i>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</i></p>	<p>Except during construction, GNR would not involve increases in traffic that would noticeably affect tranquillity. Well-designed green infrastructure is proposed as part of the development – including a community orchard, permissive paths and other improvements. No new road development is proposed as part of GNR.</p>
		<p><i>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.</i></p>	<p>Areas in solar fields, within proposed woodland and within ecological mitigation areas proposed as part of GNR would not be ploughed and would only require minimal cultivation for the duration of the Development.</p>
		<p><i>Restore and manage hedgerows, where they have been lost, to</i></p>	<p>GNR includes proposals to restore and manage hedgerows,</p>

Ref.	Summary Position of Interested Party	Applicant's Responses	
JPAG [REP4-074]		<p><i>strengthen the historical field patterns, improve wildlife networks and enhance landscape character</i></p>	<p>and the reinstatement of an historic hedgerow. GNR also includes proposals to include wildlife networks.</p> <p>These changes will be beneficial to the landscape character, but overall effects on character would be significant and adverse during the construction and operation of the Development.</p>
		<p><i>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,</i></p>	<p>GNR includes proposals for both new woodland and hedgerow trees and would not involve the removal of trees and riparian habitats along watercourses.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses	
JPAG [REP4-074]		<p><i>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.</i></p>	
		<p><i>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.</i></p>	<p>GNR includes proposals for new riparian habitats.</p>
		<p><i>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.</i></p>	<p>GNR would neither contribute to nor detrimentally affect this opportunity.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses	
JPAG [REP4-074]		<p><i>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</i></p>	<p>The biodiversity enhancements proposed as part of GNR would make a notable positive contribution to this opportunity.</p>
		<p><i>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.</i></p>	<p>The long-term presence of the solar farm would not be detrimental to the ecosystems which support agricultural production.</p>

3.5 RESPONSES TO LAXTON AND MOORHOUSE SOLAR CONCERNS' DEADLINE 4 SUBMISSION

Table 3-4 Responses to Laxton and Moorhouse Solar Concerns' Deadline 4 Submission

Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REF4-075]		
<i>Flood Risk, Drainage and Water</i>		
Page 2	<p><i>“As previously mentioned (EN010162-000499), the village of Moorhouse lies in a shallow hollow, through which runs the Moorhouse Beck. Planned placement of riparian planting along the beck and covering each side of its surrounding fields with solar panelling will undoubtedly raise the potential for flooding of village properties, something for which there is already significant threat. This has been implicitly acknowledged by Elements Green who have removed panelling immediately adjacent to the beck following their Preliminary Risk Assessment on flood risk to their own equipment. No assessment has been made on the flood effects to properties in the area. The recent weekend of 27/02/26 has highlighted the flooding potential that would be exacerbated by solar panelling placement in this area. Some 25-30mm rain fell in Moorhouse on the evening of 27th resulting in high water in the beck, exemplified in the photographs in Appendix A, taken at at 08:00 on 28th . It should be noted that water levels had dropped by at least 1m by</i></p>	<p>The assessment of the impact of the Development on flood risk associated with Moorhouse Beck is set out in the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] and has been addressed in the response below.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REF4-075]		
	<p><i>midday on 28th after no further rain had fallen. To date, no analysis of flooding to the village of Moorhouse that would arise from the GNR Solar project has been evidenced."</i></p>	
Pages 2 - 3	<p><i>"The Flood Risk Assessment (FRA) methodology, as previously observed (EN010162-000587), remains weak. Its description at A9.1.1.3 makes no reference to the boundaries within which the assessment remains valid, though the previous published FRA documents explicitly exempt themselves from effects on anything other than the solar plant itself, and acknowledge that even this has been achieved only from desktop study.</i></p> <p><i>Three risk categories are identified (Negligible, Low, Moderate to High) but no indication is given as to how these are derived or justified. No Hazard Risk Matrix or Hazard Risk Index are provided to support contentions or arguments that could help define these categories, their confidence values and credibility. No measurement metrics or variance are provided. The concept of As Low As Reasonably Practicable (ALARP) is not referenced, though the concept, even if unknown, must have guided the arguments and assurances by which a 'high, medium, low'</i></p>	<p>The study area of the Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] is described in Section A9.1.1.3.1, at page 3. The FRA assesses the Core Study Area, which is the Order Limits. Wider study area, which is a 5 km buffer of the Order Limits has also been assessed based on a desktop study. The Applicant considers this approach to be proportionate, and has provided sufficient information to inform the flood risk as a result of the Development. Both EA and NCC agreed with this.</p> <p>The Applicant does not agree that there is no indication of how the risk categories are identified. Paragraph 12 of the Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] explains that "<i>Flood risk will be classed as Negligible (where little or no risk is identified), Low (where theoretical risk is identified but mitigating factors may influence flood levels) or Moderate to High (where modelled levels or historical events show risk to the Work Areas)</i>". The conclusion section of this Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] justifies the risk category using professional judgement and experience of assessing similar types of projects/scenarios. This approach is consistent with the Flood Risk Assessments prepared in support of a number of made DCOs, including the Cleve Hill Solar Park DCO and the Mallard Pass Solar Park DCO, in which both the Examining Authority and Secretary of State were content with the approach adopted in the assessment</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REF4-075]		
	<p><i>assessment could be formed [6]. The presumption that this is aligned with other solar farm assessments is a significant point for concern. It would not be tenable to copy something without understanding it, its applicability and value.</i></p> <p><i>The assertion at A9.1.1.4 that Guidance and Legislation is met represents weak assurance. Such satisfaction would be an accepted mandatory baseline and the lack of credible and coherent argument beyond this is a significant failing. Where consequences should have reasonably been foreseen and have not been appropriately mitigated, a company would be culpable, even if pertinent regulations had been met. However, little evidence exists of any attempt to produce an holistic and all-encompassing safety case for the project.</i></p>	<p>methodology. Again, both EA and NCC agreed with the approach in the Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050].</p> <p>As stated in the Planning Statement [EN010162/APP/5.4C] [REP3-018], the approach is proportionate to the risk and appropriate to the scale, nature, and location of the project. Importantly, this FRA should identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction. Throughout the early stages of the Development, design opportunities to identify existing pluvial flow pathways and extensive consultation with communities affected by pluvial flooding have been undertaken, with a view to identifying positive interventions to reduce the existing impacts of prolonged or intense rainfall events.</p>
Page 3	<p><i>Although the flooding issues for Moorhouse village have been raised directly with Elements Green, both through report and at the Village Meeting, as well as in documents submitted to the Inspectorate, it is disappointing that the risk to the village and outlying properties has not been considered even when assessing the risk</i></p>	<p>It is acknowledged that Moorhouse is prone to flooding from Moorhouse Beck within the village, and this is evidenced by images provided by the Interested Party, which show a canalised section of Moorhouse Beck overtopping and flows being constricted by the road bridge carrying Ossington Road.</p> <p>The current conditions in Moorhouse is recognised in ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9A] [REP3-022]</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REF4-075]		
	<p><i>of the beck at A9.1.2.2.2. The contention that wracking 'suggesting a capacity to convey substantial flows without becoming bankful' is clearly wrong, as exemplified in the Parish flood report of 2023 [7] and the 2026 photographs in Appendix A.</i></p> <p><i>Equally, the contention also in this paragraph that 'As such, the risk of flooding from Moorhouse Beck is Negligible' is demonstrably wrong from the same evidence above and from Elements Green's own actions of removing solar panelling from adjacent to the beck.</i></p> <p><i>The report states 'Plate A9.1.12 shows a cross section through the floodplain suggesting that should Moorhouse Beck overtop its banks then floodwater will spread over a wide flat area to shallow depths, and not interact with electrically sensitive infrastructure in Work Area 1, Solar PV.' This sentence appears to acknowledge the widespread effects that any flooding causes to the village area, but this has not stimulated any investigation or modelling of the effects that the panel placement in this area could play in flood stimulation and aggravation.</i></p>	<p>and in ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050]. Plate 9.2 of ES Volume 2, Chapter 9: Water Resources [EN010162/APP/6.2.9A] [REP3-022] explains that the existing flooding downstream to Moorhouse Beck is a result of the clay soils promoting rapid runoff. Figure A9.5 of the ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] confirms that the area near Moorhouse is subject to pluvial flood risk, where overland flows are generated outside of the Order Limits.</p> <p>However, there is no evidence to suggest that the solar arrays would result in a significant effect on runoff volumes or peak flows, and as such, the development would not exacerbate the existing fluvial flooding issue.</p> <p>The Applicant has also set out the responses in Table 3-14 of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115], at pages 108-109.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REF4-075]		
Page 4	<p><i>This report includes third party testing in the form of Infiltration testing at 4 sites. Although none of these sites are close to Moorhouse, they finish with Discussion similar to: 'The soils encountered beneath the topsoil were found to be typical of the weathered fraction of the underlying Mercia Mudstone Group. The strata conditions and subsequent drainage characteristics appear to be comparable across the site. In this instance, the infiltration testing has revealed that the soils have practically impermeable drainage characteristics. Therefore, soakaways cannot be recommended at this site and an alternative form of drainage should be adopted.</i></p> <p><i>Each draws the same conclusion that soakaways are not recommended. Each of the areas was described as 'Nominal thickness of topsoil overlaying clay representative' which also describes the strata in the Moorhouse area. Rain falling on this land will soak through the light topsoil, but sit on the clay substrata. Folds in this substrata will form under and overground streams and result in pooling. It is therefore of no surprise that in this shallow valley, the village was known as 'Moorhouse on the bog', until the drainage beck was</i></p>	<p>Please refer to the Applicant's responses on this, as set out within Table 3-14 of the Responses to Relevant Representations [EN010162/APP/8.16A] [REP2-115].</p> <p>Infiltration testing was undertaken at locations within Work Area 4 (Intermediate substations) to determine whether the disposal of surface water from hardstanding could infiltrate within a point source infiltration structure such as a swale or infiltration basin. The testing confirmed that infiltration was not a viable option for Work Area 4. It does not indicate that soakaways are not recommend for all the areas within the Order limit, and that the soils are impermeable.</p> <p>ES Volume 4, Appendix A9.1: Flood Risk Assessment [EN010162/APP/6.4.9.1C] [REP3-050] does not assert that "run-off can be alleviated through soakaways" and the Development is likely to provide beneficial effect on surface water run-off rates compared to the baseline agricultural scenario, as the fields within the Site will no longer be:</p> <ul style="list-style-type: none"> • Ploughed or furrowed; • Left without vegetation cover for long periods in the winter; and • Regularly traversed by heavy farm machinery. <p>The summary below highlights some of the academic research supporting solar panels' effect on runoff and the use of land management strategies for reducing runoff:</p> <ul style="list-style-type: none"> • Cook & McCuen (2013) outlines that solar panels do not have a significant effect on runoff volumes or peak flows when

Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REF4-075]		
	<p><i>created in the 1850's, allowing the fertile land to be used for agriculture.</i></p> <p><i>Previous contentions that run-off can be alleviated through soakaways or grasses appear to have been omitted from the continuing arguments (though photographs at pages 49-51 remain), presumably given the evidence highlighted above that soakaways are inappropriate. Equally the original reliance on Milazzo et al [8] to counter the arguments by Baiamonte [9] regarding increased run-off from solar panels appear to have been rescinded, given that Milazzo's Conclusions specifically acknowledge that 'these general indicators are limited in scope' and that 'At present, their extent and regional impact is mostly unknown' when referring to claims that grasslands reduce flood impact. It is also worth reiterating the point made in EN010162-000493 that it takes approximately 400,000ltr of water to grow an acre of wheat, equating to approximately 75,000,000ltr yearly to grow the wheat currently immediately around the outflowing beck. With panels installed, this water would have to outflow through the beck. It may be argued that the crop is not growing during the most likely times of flooding, but as described above, the local land is spongiform. It drains</i></p>	<p>vegetation is present. For example, the article states "Inclusion of the panels did not have a significant hydrologic impact'. Runoff is only increased when ground beneath panels is bare, which is not the case for the sites.</p> <ul style="list-style-type: none"> • Valderrama et al (2024) and Wang and Gao (2023) show similar results to Cook & McCuen (2013), the inclusion of solar panels had a non-significant difference in peak discharge rate. • Walston et al. (2021) showed on average native grassland under solar panels increased water retention by 19% and 9.5% compared to agriculture and short (turf) grass. • Milazzo et al. (2023) reviews the role of grassland for erosion and flood mitigation in Europe and provides quantification that permanent grassland mitigates better runoff than arable land. • The EA (2025) published research and analysis of run-off management, the study highlights with high confidence the increase in vegetation cover (e.g. grassland) slows the flow of run-off and increases attenuation of water.

Ref.	Summary Position of Interested Party	Applicant's Responses
Laxton and Moorhouse Solar Concerns [REF4-075]	<p><i>throughout the growing period, recharging in the rainy months and providing a resilience to the flood risk. Solar panels will not allow cropping or even natural evaporation under their shade and thus the spongiform land will lose its ability to moderate rainwater flow into the beck.</i></p> <p><i>As such, the overall concerns regarding increased flood risk to Moorhouse, raised in EN010162- 000499, EN010162-000500 and EN010162-000587 have not been addressed or mitigated, in this, or previous reports, and so the contention that Moorhouse will suffer increased flood risk due to this project remains valid.”</i></p>	

3.6 RESPONSES TO MKLTD PRIVATE SECURITY PRACTICE 'S DEADLINE 4 SUBMISSION

Table 3-5 Responses to MKLTD Private Security Practice's Deadline 4 Submission

Ref.	Summary Position of Interested Party	Applicant's Responses
MKLTD Private Security Practice [REF4-081]		
<i>Energy Security</i>		
Page 1	<p><i>“MKLTD’s involvement in the Great North Road Solar & Biodiversity Park is a strong strategic fit: it strengthens security, protects environmental assets, and supports one of the UK’s most important clean-energy projects. It will deliver large-scale renewable power and major biodiversity gains, making it an ideal strategic opportunity for MKLTD.”</i></p> <p><i>“[...] the project will generate over 1 GW of clean electricity, helping the UK meet legally binding net-zero commitments through new tree planting and extensive habitat creation. MKLTD’s multi-sector capability ensures the site remains protected, resilient, and well-managed throughout construction and operation. Together, MKLTD and the project deliver energy security, community value, and long-term environmental benefit. Here at MKLTD we welcome a favorable outcome.”</i></p>	Noted. MKLTD is invited to register at the supplier portal on GNR website.

3.7 RESPONSES TO NATIONAL GAS TRANSMISSION PLC 'S DEADLINE 4 SUBMISSION

Table 3-6 Responses to National Gas Transmission PLC's Deadline 4 Submission

Ref.	Summary Position of Interested Party	Applicant's Responses
National Gas Transmission PLC [REP4-076]		
<i>Concept Design Parameters and Principles</i>		
Pages 1-3	<p>In response to ExQ2 Q10.2.5</p> <p><i>"The Concept Design Parameters and Principles [REP3-068] and Requirement 6 should be updated to refer to 'National Gas Transmission plc' rather than 'National Gas Limited'. NGT's apparatus is shown in the plan at Appendix 1 of this submission.</i></p> <p><i>a. NGT owns and operates a high-pressure pipeline (FM09 - Silk Willoughby to Staythorpe) located approximately 700 metres from the red-line boundary of the Order Limits as shown on the plan at Appendix 1. Although there is no direct physical interface between the Apparatus and the DCO Project's Works (there is no cable crossing over the apparatus), there is the potential for electromagnetic interference which NGT needs to be consulted on. Under the UKOPA Good Practice Guide UKOPA/GPG/027 Edition 1.1 - AC Corrosion Guidelines 2023, projects should assess for the</i></p>	<p>The entity title has been updated in the Concept Design Parameters and Principles [EN010162/APP/7.14D]. The Applicant will continue to discuss the outstanding matters with National Gas.</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
National Gas Transmission PLC [REP4-076]	<p><i>potential impacts from electromagnetic interference on high-pressure pipelines up to 1km from the emitting project: (“The a.c. interference risk on all existing pipelines should be assessed in accordance with the pipeline design code requirements. All overhead power lines or a.c. substations within 1000m of a pipeline system operating at voltages of 66 kV or above should be considered.”, para 6.5) Within this range, there is the potential that in the event of an electrical fault, currents can flow into the ground through a grounding system, causing the surrounding ground to become electrically charged. This current flow causes the ground potential in the vicinity of the fault to rise significantly which can extend several meters away from the point of contact. The magnitude of ground potential rise depends on several factors but the risk increases significantly if pipelines are present due to the potential for the current to be conducted along its length. Pipelines with low resistance to electromagnetic interference are particularly susceptible such interference and there is a risk of electric shock to personnel and equipment working on or in proximity to any such pipeline when a fault occurs. Although the Applicant has a duty to consider</i></p>	

Ref.	Summary Position of Interested Party	Applicant's Responses
National Gas Transmission PLC [REP4-076]	<p><i>earthing design and electromagnetic interference in the design of its Project, there are a different set of standards for pipelines, as set out in UKOPA/GPG/050 Edition 1 - Electrical Interaction on Pipelines: Collaboration between Developers and Operators, which help ensure compliance to the Pipelines Safety Regulations 1996. The assessment of these effects is a specialist area, requiring specialist competencies. NGT reserve the right to approval any assessments of such effects on its pipelines.</i></p> <p><i>b. NGT considers that these issues can be resolved at detailed design stage to ensure that Works 6 (connection works to existing substation) and 7 (connection works to consented BESS) are constructed in such a way as to minimise the risk of electromagnetic interference to the NGT apparatus.</i></p> <p><i>c. NGT does not have any record of agreeing that specific PPs for the benefit of NGT were not required. Given the need for NGT potentially to assist with the development of resolutions to any electromagnetic interference risk at design stage and, in any event, to approve the assessment and works, it does appear appropriate to NGT to include in the</i></p>	

Ref.	Summary Position of Interested Party	Applicant's Responses
National Gas Transmission PLC [REP4-076]		
	<p><i>draft DCO a specific set of PPs for NGT's benefit</i></p> <p><i>d. NGT looks forward to working with the Applicant as expeditiously as possible to agree the final form of the specific protective provisions. NGT has a recognised standard precedent that would be satisfactory, subject to any bespoke tailoring to ensure that this particular interaction from on a pipeline 700m away is caught within the definition of 'specified work'. NGT proposes to take up this matter directly with the Applicant [...]"</i></p>	

3.8 RESPONSES TO OSSINGTON SOLAR CONCERNS' DEADLINE 4 SUBMISSION

Table 3-7 Responses to Ossington Solar Concerns' Deadline 4 Submission

Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns [REP4-078]		
<i>Cultural Heritage and Archaeology</i>		
Pages 1-3	<p><i>"Elements Green have always measured the significance of the airfield in terms of archaeological remains and not as an</i></p>	<p>Please refer to the Applicant's responses on this matter as set out within Table 3-8 of the Responses to Deadline 3 Submission Report [EN010162/APP/8.29] [REP4-059], at pages 83 to 84. The Applicant</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns [REP4-078]	<p><i>interactive cultural and heritage asset that is referenced and appreciated daily, weekly and monthly by walkers, airfield and plane enthusiasts, amateur astrologists, bird watchers, kite flyers and all manner of other activities that such a site allows. Elements Greens narrow and limiting perspective has been evident throughout the design, consultation and planning process. Their lead consultants are a major archaeological firm. Although Heritage Interpretation and Presentation is included within the scope of their work, the research outside scheduled and designated building and sites is superficial and appears to rely only on deskbased assessments. Elements Green have been made aware of the importance of the airfield site right from the earliest public consultations in the villages, through many and detailed submitted objections and throughout the planning process. Jason Mordan from Nottinghamshire County Council has researched the site in some depth and recognized the importance of the site from a professional perspective. We have provided evidence of the extent to which the airfield is appreciated and valued by so many people. Elements Green need to redirect their focus to</i></p>	<p>considers that there is heritage value at the location, including a contribution made by those remains within the Order Limits. A Joint Statement on the Ossington Airfield has been prepared by the Applicant together with NCC, and sets out the position of the Parties with respect to the former RAF Ossington. Please refer to Appendix 1 of the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1C] [AS-083].</p>

Ref.	Summary Position of Interested Party	Applicant's Responses
Ossington Solar Concerns [REP4-078]	<i>this reality. Solar panels on the airfield site compromise the integrity of the site to the extent that the heritage and cultural aspect is destroyed and they should be removed from the proposals.”</i>	

4 RESPONSES TO EXA'S SCHEDULE OF CHANGES TO THE DRAFT DCO

4.1 OVERVIEW

- 4.1.1 The ExA published a proposed schedule of changes to the applicant's draft Development Consent Order (dDCO) (Revision 06) [[REP4-005](#)] on 1 April 2026. The Applicant's responses to the proposed schedule of changes are set out in the table below.

Table 4-1 Responses to the ExA's schedule of changes to the Draft DCO

Article/ Schedule	ExA's proposed changes	ExA's reasoning and comments	Applicant's responses
Articles			
Article 39 Felling or lopping of trees and removal of hedgerows	(1) Subject to Article 40 (trees subject to preservation orders) the undertaker may fell or lop any tree or shrub near any part of the authorised development or cut back its roots, if it reasonably considers believes it to be reasonably necessary to do so to prevent the tree or shrub from—	The ExA considers the revised wording addresses NSDC's concerns over imprecise wording: 'near' and 'reasonably believes'. The ExA considers that the proposed additional words 'Subject to Article 40 etc' bring it into line with the most recently made order for Fenwick solar farm.	The applicant agrees with the ExA's proposed changes to this article. This is reflected in the Draft Development Consent Order [EN010162/APP/3.1F] submitted at Deadline 5.
Article 49 Set-off for enhancement in value of retained land	Deletion of the entire article	With regard to the applicant's response to ExQ2 and some of its concerns over section 6D of the Land Compensation Act 1961, the ExA considers it is sufficiently clear at section 6D (5) that the relevant provisions would apply to any made DCO. The precedents for an equivalent article, cited by the applicant in its explanatory memorandum [REP4-008], are made orders for road schemes, and there is no precedent in made orders for solar schemes. Whilst the ExA accepts that such	As per the Applicant's Responses to ExA's Second Questions [EN010162/APP/8.30] [REP4-060] , Article 49 provides certainty within the context of the DCO for the Proposed Development as to the scheme to be disregarded for the purposes of assessing compulsory purchase compensation in the 'no scheme world'.

Article/ Schedule	ExA's proposed changes	ExA's reasoning and comments	Applicant's responses
Articles		<p>provisions relating to land compensation may, in principle, be made within an order it has no reason to think that the existing legislative regime would not be sufficient in this case. On balance the ExA considers that Article 49 is not necessary and proposes that it be deleted from the dDCO.</p>	<p>As part of the ExA's rationale for proposing the deletion of Article 49, specific reference is made to the orders which the Applicant has cited in its Explanatory Memorandum [EN010162/APP/3.3D] [REP4-007] as precedent for the inclusion of an equivalent article. Respectfully, the fact that these orders are for road and not solar schemes is irrelevant. Furthermore, The Rampion 2 Offshore Wind Farm Order 2025 ("the Rampion 2 DCO") contains an equivalent article to Article 49 – see Article 54. The Rampion 2 DCO was made on 4 April 2025 (following the coming into force of sections 6A-6E of the Land Compensation Act 1961 and the 'no scheme principle') by the Secretary of State for Energy Security and Net Zero, the same Secretary of State with responsibility for determining the Application. Clearly, the Rampion 2 DCO is a very relevant and compelling example of precedent for the inclusion (and endorsement by the Secretary of</p>

Article/ Schedule	ExA's proposed changes	ExA's reasoning and comments	Applicant's responses
Articles			
			<p>State) of an equivalent article to Article 49.</p> <p>As previously submitted by the Applicant, Article 49 concerns the assessment of compulsory purchase compensation and the statutory assumptions to be applied with regard to the 'no scheme world', i.e. the rules which require land to be valued on the basis of its existing use (such as farmland or grassland) and not as a solar farm (as in the instant case), or taking into consideration the prospects such land may have for other forms of development. Accordingly, Article 49 makes plain how the statutory assumptions in respect of the 'no scheme world' should apply to the DCO for the Proposed Development, thereby reducing the scope for this matter to be disputed.</p> <p>In light of the above, and for the reasons previously stated, the Applicant remains of the view that Article 49 should be retained and that its inclusion in the Draft Development</p>

Article/ Schedule	ExA's proposed changes	ExA's reasoning and comments	Applicant's responses
Articles			
			<p>Consent Order [EN01062/APP/3.1E] [REP4-005] is merited and justified.</p>
<p>Article 50 Inconsistent planning permissions</p>	<p>Deletion of the entire article</p>	<p>The ExA has considered the applicant's response to ExQ2 and recognises that similar articles are being sought in several applications being examined at present (including for solar schemes). However, the ExA considers its removal would be consistent with the Secretary of State's reasoning on this matter, which is apparent in all other made DCOs for solar schemes. On balance the ExA sees no reason why Article 50 should remain in the Order and proposes that it be deleted from the dDCO.</p>	<p>As previously stated, the purpose of article 50 in the Draft Development Consent Order [EN01062/APP/3.1E] [REP4-005] is to allow the Proposed Development and other developments granted by local planning permissions to coexist without creating enforcement conflicts or creating a situation in which either the DCO (if granted) or the planning permission is then deemed to be unlawful. The rationale for this article arises from the Supreme Court's decision in <i>Hillside Parks Ltd v Snowdonia National Park Authority</i> ([2022] UKSC 30) and is particularly relevant to the Proposed Development due to its size and the potential for local planning permissions to overlap with the Order limits.</p> <p>The Applicant notes that the ExA proposed to delete article 50 entirely to be "<i>consistent with the Secretary of State's reasoning on this matter</i>". However, respectfully, it is not clear</p>

Article/ Schedule	ExA's proposed changes	ExA's reasoning and comments	Applicant's responses
Articles			
			<p>what the Secretary of State's reasoning is on this matter. It is noted that for other schemes where a similar article has been removed, the Secretary of State has commented that the article 'is not necessary' and it is considered to 'create ambiguity'. However, such 'reasoning' is given without providing more detail and without addressing the significant body of representations made by applicants as to why the article is intended to address ambiguity caused by the case law, not create further ambiguity.</p> <p>Upon considering this issue further, the Applicant notes that a taskforce, initiated by the current Prime Minister and led by John Fingleton (formerly of Innovate UK), published the '<i>Nuclear Regulatory Review 2025</i>'⁹ in November 2025 ("the Review").</p> <p>The Review recommends that model provisions for DCO drafting should be reinstated to help solve common problems in the consenting of NSIPs.</p>

⁹ [Nuclear Regulatory Review 2025](#)

Article/ Schedule	ExA's proposed changes	ExA's reasoning and comments	Applicant's responses
Articles			
			<p>Recommendation 28 of the Review provides that, in addition to the 'standard model provisions' (included in the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009), a number of new model provisions should be established, including:</p> <p><i>"c) A provision which ensures that overlapping consents do not lead to enforcement action being taken (see, for example, article 55(2)-(3) of the Lower Thames Crossing Order 2025)"</i></p> <p>The reason for this recommendation is that the <i>Hillside</i> judgment is "a particular concern for NSIPs", noting that "Some newer DCOs already have features intended to address this, with endorsement from the Secretary of State, and the problem is widely accepted."</p> <p>The Review and its recommendations were accepted by the Prime Minister on 26 November 2025¹⁰: "I warmly</p>

¹⁰ [Prime Minister's strategic steer to the nuclear sector following the 2025 Nuclear Regulatory Taskforce's Review - GOV.UK](#)

Article/ Schedule	ExA's proposed changes	ExA's reasoning and comments	Applicant's responses
Articles			
			<p><i>welcome [the Review] and endorse its approach, and accept the principle of all the recommendations it has set out.”</i></p> <p>It is therefore clear that the <i>Hillside</i> judgment creates potential difficulties for the delivery of NSIPs (of all types, not just nuclear, road schemes or, indeed, solar) and that a suitably worded article in the DCO is the appropriate method of addressing the same.</p> <p>The Applicant therefore maintains that the inclusion of Article 50 in the Draft Development Consent Order [EN01062/APP/3.1E] [REP4-005] is entirely appropriate and necessary to align with the current industry approach, and which is accepted at the highest level of Government.</p>