

Great North Road Solar and Biodiversity Park - Project EN010162

JPAG - Interested Party Reference [REDACTED]

Deadline 6 Summary Statement

Introduction

The timetable allows under deadline 6, for receipt by the ExA of summary statements from parties regarding matters that they have previously raised during the examination that have not been resolved to their satisfaction; and any comments on submissions for deadline 5.

JPAG

JPAG has objected to the proposed Great North Road development on multiple grounds, including the loss of high-quality farmland, flood risk, construction routes, site selection, and most critically, the scale of the scheme. When considered alongside numerous other developments, this results in a severe cumulative impact. Our fundamental concerns have not been allayed by the examination process, nor by any of the updated documents produced by the applicant.

Factual Updates on Other Projects

JPAG would like the ExA to have regard to the latest position on other projects:

- Norwell Foxholes Solar (22/01983/FULM) - this application is to be considered by the Newark & Sherwood DC Planning Committee to be held on Monday 27 April 2026 - it is recommended for approval.
- H2East Pipeline (EN0610001) - the Secretary of State adopted a Scoping Opinion 13 April 2026.
- One Earth Solar (EN010159) - On the 8 April 2026 the Examining Authority's recommendation was sent to the Secretary of State; with a decision due to be made by the 8 July 2026.

It is noted that the ExA intends to close the examination at 23:50 on Tuesday 28 April 2026. As such the outcome of the Planning Committee on the evening of Monday 27 April 2026 will be available by the close of the examination, albeit after deadline 6.

Renewable Energy

JPAG has continuously queried the suggested number of properties that GNR claims will be powered. JPAG has previously provided calculations, in addition The Norwell Solar Farm Steering Group have also provided calculations. These calculations using different consumption figures would range from 153,405 homes to 272,720 homes. The correct source to use in calculations should be average domestic consumption being 3.4MWh.

As highlighted previously, the figures put forward by the applicant suggest that Great North Road will have the potential to power double the number of homes as One Earth which is the closest NSIP scheme; yet the generation is 800MW versus 740MW.

We note that the Springwell Solar project in North Kesteven which also proposes 800MW output only claims to power 180,000 homes. The Springwell project proposes exactly the same output, and it is the very latest scheme to be decided. It is noted that the Secretary of State granted the DCO on the 8 April 2026. It is noted that the matter of the number of homes capable of being

powered was not disputed in that scheme and the ExA and the Secretary of State have proceeded on the basis that the scheme powers the claimed 180,000 homes.

This recent DCO decision on Springwell supports our position that in GNR the applicant has grossly over-stated the realistic number of homes that could be powered. The applicant has sought to mislead the public and over-emphasise the perceived benefits. There remains no substantive evidence to underpin the 400,000 homes suggested by the applicant.

Carbon Emissions

JPAG has continuously queried the suggested savings in carbon emissions. JPAG has previously supported and continues to support the technical work undertaken by the Norwell Solar Farm Steering Group.

JPAG accepts that GNR would produce electricity but disputes the fact that the energy produced can correctly be described as low carbon. To the contrary, JPAG supports REP5-048 from the Norwell Solar Farm Steering Group and in particular the calculation that GNR would result in excess emissions of between 2.3-3.1 million tonnes of CO₂ for the project's lifetime.

To provide an idea of scale, 2.6 million tonnes of carbon dioxide is roughly equivalent to 10 years of emissions from 72,000 average petrol cars.

Accordingly, if the development generates more carbon dioxide than it saves, the fundamental justification for this scheme, and potentially others, is undermined.

Need for BESS

JPAG notes that the existing 52GWh of BESS under construction or with planning approval already far outweighs the national targets. Consequently, there is no need for the BESS element of the project. In addition, there are now 3 BESS under or awaiting construction in the local area alone, including one within the GNR order limits.

Cumulative Effects

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.

As highlighted previously major projects within or immediately adjacent to the Order Limits have progressed during the course of the GNR examination. The NGET West Burton to Ratcliffe-on-Soar Refurbishment Project CPO and the Cadent 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 now a Tier 2 project. The Staythorpe Power Station Carbon Capture and Storage application sits immediately adjacent to the Order Limits and is a Tier 2 project.

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

It should also be borne in mind that the advice is primarily intended to address the consideration of cumulative effects in terms of issues that need to be addressed by EIA. It does not specifically

deal with the allied issue of clustering and concentration which are also relevant policy issues to be considered as part of the decision-making process.

In REP4-074 JPAG drew attention to existing development that has not been assessed at stages 3 and 4. In our Relevant Representation (RR-101) in Appendix 1 we set out the full list of projects that we considered should have been assessed. The cumulative assessment has also failed to take account of proposals which are clearly part of the same project, such as the relevant grid connection or connected BESS scheme.

As we also explained in REP4-074 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.

JPAG considers the entire cumulative assessment process to be so fatally flawed that it can in no way be relied upon.

Scale of Landscape Change

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.

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

The scale of GNR is disproportionate to host communities. The Development is a doughnut in shape that extends across an area of in excess of 18 thousand hectares, that's 181 square kilometres of which 1,765ha, is encompassed within the Order Limits. The majority of the land within the Order Limits is currently used for arable crops or is otherwise down to pasture.

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

The encircling effect and the clustering needs to be properly considered as part of this proposal. The regularity of experience, what is commonly called the sequential views, would increase the impact on the landscape capacity because where we are, there are very limited, crossings across the River Trent. So, there are some settlements where people will never be able to leave their village, and particularly places like Averham and Kelham, without going through the development.

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

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

Site Selection

As set out in our relevant representation (RR-101) there has been no consideration of reasonable alternatives to the potential generation of electricity. There has been no consideration of options of splitting the development into smaller projects; neither has there been any consideration of a project that generates a lower level of electricity output. The entire project has been driven simply by the agreement of 800MW of grid connection and land which landowners have put forward. JPAG remains concerned that the applicant has sought to retrofit design criteria to the land parcels it had already chosen.

There is no explanation as to the rationale of a 15km radius when other NSIP solar projects have longer connection distances to other substations at Cottam and West Burton. There is no cogent or substantive reasoning given as to why the River Trent and A1 have been used as artificial cut offs for the area of search. Other schemes such as Cottam, West Burton, Tillbridge and One Earth cross the River Trent, and no explanation is given as to why is the A1 a barrier to this scheme when other major roads aren't barriers to other schemes.

Flooding, Drainage and Surface Water Run-Off

As highlighted in our relevant representation (RR-101), it is not considered that there is any justification for siting the BESS in an area at risk of pluvial flooding. It is not operationally co-located with the Grid Connection Point but is instead a couple of miles away. There has not been any sequential assessment of locating this elsewhere in the UK near to a different Grid Connection Point, nor any consideration of whether a BESS scheme is necessary. The FRA merely tries to justify the siting of the BESS element on the basis that the BESS containers will be on concrete corner pads. However, this ignores the need to first demonstrate the sequential and exception tests.

It remains a very significant concern to the local communities that the development includes numerous slopes that are greater than a 6% slope, where surface water run-off is more likely to occur. In particular the fact that many of these appear to fall in the natural catchment of The Beck, particularly around Maplebeck. The Beck led to serious surface water flooding in Maplebeck and Caunton as well as further downstream in Norwell and Carlton on Trent recently and as such this could lead to future problems.

JPAG is not satisfied that sufficient hydraulic modelling has been undertaken specifically to assess this impact. It is noted that other concentrations of slopes would appear to be in catchment of Moorhouse Beck which could again increase surface water run-off into that watercourse causing problems in Moorhouse and downstream in Weston and Grassthorpe.

There are further areas where surface water run-off from slopes could lead to roads such as the road between Ossington and Kneesall. There is also a concentration of slopes to the north of Cheveral Wood which could harm ecology and an ancient woodland.

Impact on Agriculture Including Best and Most Versatile Agricultural Land

The impact of the project on tenant farmers has not been considered separately to the impact on the landowner owned/run farming enterprises.

JPAG remains concerned about the scale of loss of BMV land cumulatively in the context of Newark and Sherwood and sub-regionally in the context of Nottinghamshire and Lincolnshire.

Heritage Assets Including Ossington Airfield

The outer edge of the Conservation Area of Maplebeck overlaps slightly with the solar park site. Within 2 km of the solar park site are 17 Conservation Areas along with 227 listed buildings (of which 19 are listed at Grade I), 26 Scheduled Monuments and one Registered Park and Garden.

Between 2 km and 5 km from the solar park site are a further 18 Grade I Listed Buildings, 28 Grade II* Listed Buildings, 29 Scheduled Monuments, one Registered Park and Garden and one registered battlefield.

Cumulatively the development together with other projects will result in a substantial area and scale of landscape change that would harm the setting of numerous designated and non-designated heritage assets.

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

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

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

It is noted that as at deadline 5 there is no final statement of common ground with NCC, but in REP4-029, the County Council was still of the view that insufficient investigations had been undertaken to assess the heritage significance of Ossington Airfield and the impact of development on it. JPAG agrees with this stated position, the development would result in substantial harm (in NPPF terms) to the significance of the WWII airfield.

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.

Conclusion

JPAG continues not to support the GNR proposal for the reasons that we have set out throughout the examination process. On balance JPAG still considers that the substantial and significant harms that would arise make the development fundamentally unacceptable.