

Great North Road Solar & Biodiversity Park – EN010162
Carlton-on-Trent Parish Council – Reference number: [REDACTED]
Deadline 6 response

Carlton-on-Trent Parish Council remain disappointed, frustrated and disillusioned with the lack of specific information forthcoming from the applicant.

We have not received any response to the email we sent to the applicant, a copy of which is in Deadline 5.

The applicant's response to our submissions contain links to their plethora of documents which, in some instances has been useful. Due to the size of the project, the large number of documents discussed the premise and a preamble of the project but do not specifically refer to impact on any one community – each parish is decidedly different, solar arrays will have bespoke effects and require different considerations – none of this is at all evident. This project is too big for all aspects to have been considered and mitigated for.

FLOODING

Carlton-on-Trent Parish Council does not agree with the comments made by the applicant in response to our concerns. The applicant has failed to produce any further tangible information, instead relies on referring to their documents already quoted, adding links to other documents – which they have produced.

From EN010162/APP/6.4.9.1B [REP1-039], Section A9.1.3.2.1 of ES Volume 4, Appendix A9.1 *“in areas where PV arrays run parallel to a slope of 6 % or greater, active measures such as berms, stone filter drains and swales will be incorporated to slow the flow of surface water run-off as part of construction SuDS, which **could be retained for the operational phase** of the Development.”(my bold)*

We question why these would be created if not to keep for the duration of the project. Again it appears that the applicant has not thought through the project in its entirety

“Filter drains would measure 200 mm width and 300 mm depth in the form of a linear scrape which is backfilled with clean, uncompacted Type 2 or 3 aggregate. The use of grassland and wider vegetation planting within and around the PV arrays provides a significant betterment than the existing agricultural scenario and as a result will not increase surface runoff.”

There is no evidence to back this claim.

We note the applicant intends to use **clean** aggregate; this is essential to their ability to function. Once clogged with soils and silt run off and debris from the land, these are no longer viable. Unless consistent maintenance is carried out these will not work. While the applicant claims there is a management plan it will fall to the Local Authority to monitor this is carried out – something that they do not have either the financial resources or the manpower to do.

“Models of the existing pluvial flow pathways around the catchment of Carlton-on-Trent are being brought forward via the NG+ fund, which seeks to provide opportunities for flood alleviation in communities with existing flooding issues via natural Flood Management techniques.”

Flood mitigation measures are currently being completed in areas of the Trent valley by NCC and the Environment Agency, including Sutton-on-Trent, the applicant is mistaken, no flood mitigation measures are happening at Carlton-on-Trent. Furthermore, we have been told by our District and County Councillors this work is **not** part of NG+ fund.

Studies indicate that solar panels can concentrate water flow, increase peak discharge by up to 11 times, and accelerate soil erosion on slopes. Various research projects such as [ScienceDirect \(Darvishan et al.\)](#): suggests panels affect hydrological processes differently depending on the slope, [Wiley \(On the Hydrology of PV Systems\)](#): shows that panel arrays can significantly increase peak discharge.

The applicant makes no mention of such research, referring to their modelling, which is based on theory and predicted data from outside agencies. The applicant failed to incorporate local knowledge which would have enhanced any modelling; during the examination period the flood maps changed which saw the removal of several planned fields of panels, had the applicant consulted with a view to listening, and acted on local knowledge, they would have been able to input this information into their modelling much sooner. The applicant continues to fail to listen, we have explained which other fields are prone to flooding and the knock-on effect to specified ditches and finally the village and roads including the A1. We have made the applicant aware that there are dikes missing off their maps, which inevitable will alter the outcome of their modelling, which leaves their drainage strategy as questionable at best.

The cavalier approach of the applicant gives cause for concern, to us this is serious, we will have to take the consequences, pay the bills if they have calculated wrong through our insurances premiums, our council tax increase and our mental health [some already paying emotionally with residents reporting sleepless nights from what is to come, anticipating the increased flooding and feeling trapped because houses are not selling as easily as they did prior to the announcement of this development].

Despite substantial research showing increased water run caused by panels – including our submission REP1-072, the applicant denies this is the case, [EN010162-001201-GNR 8.31 Responses to Deadline 4 Submissions.pdf](#) page 24:

*“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. 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”. (my bold)*

The claim that the works post operation during reinstatement are outlandish to say the least, this could only happen with mechanical equipment returning to the land, turning and aerating the soil – this contradicts all claims so far. There is no evidence for this furthermore as we have already explained land will be considerably more impacted due to 40 years of sheep grazing.

This is **the first time** we have been told there are NO planned measures for Carlton-on-Trent. The applicant has again failed to listen, we are the end of the chain, increased water runoff will come to us and quicker.

It is repeated practise from the applicant to claim we are wrong by using a previous document of theirs – which has already been disagreed with. In sub [EN010162-001201-GNR 8.31 Responses to Deadline 4 Submissions.pdf](#) Page 26 the applicant claims we did discuss compaction of Field E6 and quotes his own notes, which we have disagreed with, saying:

*“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.*

if it was wrong the first time, saying it again does not make it right!

Substation

We have no information to say why the current substation at Carlton-on-Trent was disregarded. The applicant cannot say they have considered ALL mitigation measures unless ALL other options have been considered. Our local knowledge on this subject has never been sort. The applicant has not responded to our email and explained this choice.

We disagree with the current proposed site. The Forestry Commission have expressed clear guidance on the requirement to maintain a 15 meter buffer from Ancient Woodland [EN010162-000622-GNR 4.3B Book of Reference \(Clean\).pdf](#) which includes **all** associated infrastructure such as cables.

Best & Most Versatile Land (BMV)

The applicant clearly made errors in the original calculation of BMV land, we have now been told that there will be **3,222.2 ha** of BMV land taken up by this project.

We do not agree with the applicant that “... *land quality would not be affected by the installation of solar panels*” and have submitted several pieces of information supported by evidence to show why this assertion is in correct.

Every person on this planet is dependent on that top six inches of soil
Food production is vital, NO BMV land should be removed.

Wildlife and Biodiversity

The applicant has again claimed that they used “... *A range of baseline studies, following good practice methods, ... to establish the status and distribution notable and protected species and habitats in the parish and all other parts of the Order Limits and these are presented in ES Volume 4, Appendix A8.1–12 [EN010162/APP/6.4.8.1–12].The survey methods in ES Volume 4, Appendix 8.4: Breeding Birds Baseline [EN010162/APP/6.4.8.4] [APP-217 follow good practice and are standardised and repeatable methods to determine the breeding status and location of birds. **The locally observed activity of birds does not necessarily reflect the breeding status of the species.***”

We do not agree. When the outcome is a pair of Tawny Owl chicks that very clearly indicates it **does** reflect the breeding status.

Excluding woodlands surrounded by the project (and thereby not assessing if there will be an impact) does not give a true reflection of biodiversity and wildlife in our area, this demonstrates the repeated 'light-touch' approach we have so often seen. We therefore cannot agree with the applicants reports.

Deer fencing

[EN010162-000751-GNR 8.21 Responses to D1 Submissions Draft.pdf](#) page 184

*The applicant claims "A lower height is **unlikely** to be effective, and doubling the required length of fence overall (Chapter 5 sets a maximum length of 140 km) would result in a greater environmental footprint and cost. The fences are to be located within the fields, and the fields will be surrounded by hedges. Except for a relatively short period immediately following the construction phase, when new hedges are still establishing, fences will not generally be visible as a result of the hedges. Having a double fence is therefore not considered to be the best practicable environmental option."*

The lower double fencing has proved effective controlling deer from areas of tree planting, we have already demonstrated that costs are lower, (shorter rolls of wire are considerably cheaper), they are easier to install as well thereby reducing carbon footprint for installation. The lower fences will be screened more quickly from hedge growth which the applicant claims will be a short period of time. *Short period* is subjective – hedges will require time to grow to height and then density to obscure view. To get density requires cutting back when young which mean height will not be established. If allowed to grow to gain height density will not exist – you can not have both. This will be a minimum of 10 years dependant on species planted, density and care given, furthermore the drier summers currently experienced are causing young trees and shrubs to develop more slowly. 10 years is a quarter timescale of the GNR project. This is not a short period.

Visual Impact on Heritage Assets

[EN010162-001201-GNR 8.31 Responses to Deadline 4 Submissions.pdf](#)

We do not agree with the applicants claim regarding St Mary's, however we find their breakdown of what is a heritage asset useful.

"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 budlings and spaces within the churchyard and village, is part of what defines the character and appearance of the Conservation Area".

The applicant has made assumptions, it is presumptive, as an outsider, to decide what is important to us and what makes St Mary's stand out, we ring the bell on a Sunday morning as a calling to church, we look across the fields to the spire as a calling to home – it is the churches very presence that defines her and creates her contribution. You do not get this from the churchyard

1. "setting" is not a heritage asset and its importance lies in what it contributes to the significance of the heritage asset. [Agree – hence our comment above](#)
2. Secondly, significance is the sum of the interests (archaeological, historic, etc.) which an asset may have. [Recognising historical significance and future, and enabling future generations to recognise the point made above](#)
3. 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. Agree – as above, St Mary’s is seen from all roads outside of the village curtilage and from all PRoW

The idea that “*The setting in which these can be most readily appreciated is within the churchyard itself, and within the village in which its lies*” is wrong.

Traffic and Noise

The applicants traffic assessments are incorrect. We have carried out our own surveys on the B1164 Ossington Road– not tabletop

Sunday 12th April 2026 6-7pm -Total 18 movements. (Plus 1 pedestrian).

Monday 13th April 2026 7-8am - Total 29 movements including 3 HGVs.

Monday 13th April 2026 8-9am - Total 25 movements.

Monday 13th April 2026 9-10am - Total 17 movements including 1 HGV. (Plus 1 pedestrian.)

Monday 13th April 2026 10-11am - Total 19 movements.

Monday 13th April 2026 11-12am - Total 17 movements including 1 HGV. (1 cyclist Eastbound).

Total over 6 hours - 125 movements including 5 HGVs. (Plus 2 pedestrians and 1 cyclist.)

Given the constraints of our own resources (this is not our full-time job) we have not been able to extend our survey over different days, however the figures **do show** the applicants survey is **not** a true reflection of the situation. Consequently, we are unable to accept either their traffic survey or the noise assessments, and any proposed mitigation would not be based on correct data.

Points to note:

- MOD asked to be re-consulted should the development change in way:
[EN010162-000495-Ministry of Defence - 20251119 MOD Response EN010162 DIO 10064485.pdf](#)
- Two crops from one field: - The applicant has now explained they are referring to “Cover Crops”.
 - This is not two crops in the conventional sense, it is a current theory of trying to increase biodiversity and/or income, it is a theory.
 - farmers have yet to accept the ideals due to heavy outlays for very little/no return - there is also a reduction in yield of the main harvest too which makes the ideology less appealing, due to less overall income.
 - Farmers that have invested (and this is significant) in this ideology are questioning the benefits (Andrew Ward MBE, Ledenham)
 - The theory that you could improve water conservation and biodiversity can be achieved in better ways.
 - This practice **will not** work on heavy clay lands so will not be successful in our location (it isn’t happening). This is because the practice is dependent on the second crop being a spring planting, heavy clay soils fair better with winter planting. Losses would be significant.
 - The applicant’s point is mute.
- When we ask who will safeguard us in the event the application is approved – for whatever reason, we are told by the applicant that would be up to the Local Authority. What measures are in place to enable this to happen? (how will the LA resource this, we will see rises in our taxes)

Summation

The applicant has repeatedly told us they have followed the guidance and policies of a NSIP – but the guidance was not written for a project of this size. The size has enabled them to avoid focusing on the issues that communities would experience, instead they have given a broad overview. This is exacerbated as the large project has been spread over an even larger area, this has prevented the applicant examining specific issues to each community.

Carlton-on-Trent Parish Council strongly believes the planning guidelines need to be exceeded for a project of this scale to ensure minimal impact in the 40 years of the project life. The council therefore urge the planning inspectorate to consider the very real impact of matters such as flooding, noise, loss of amenity and industrialisation which has been underestimated and glibly dismissed throughout the application.

The applicant will argue they met their obligations; we dispute this as their obligations included moral as well as following the guidance.

Carlton-on-Trent Parish Council have approached the application with concerned trepidation and anxiety. Over the passage of time this concern has grown exponentially. Lack of clear information has meant that more questions have arisen.

If this had been a project on a smaller scale these queries would have been addressed. We believe this application should be **rejected** and broken down into appropriately sized portions that can properly and correctly be assessed looking at the impact of the very different aspects on each of the communities.