

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

For the attention of the Secretary of State for Energy Security and Net Zero, the Honourable
Miatta Fahnbulleh MP

Dear Miatta Fahnbulleh,

As you consider the application EN010162, we wish to inform you of actions the applicant failed to fulfil.

Four substations have been proposed with this project; however, their siting has not been given careful consideration and has not followed the requirements set out in the regulations. We are focussing on the one proposed between Ossington and Carlton-on-Trent, off the B1164 adjacent to an ancient woodland, Carlton Wood; scrutinising the other substations may produce a similar analogy.

Substations are not insignificant structures, these are not decommissioned after 40 years, it is therefore essential that siting is giving due diligence.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) Schedule 4 Paragraph 2 sets out the information for inclusion in the Environmental Statement as:

*“A description of the **reasonable alternatives** (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”¹ (my bold)*

No other sites for this substation were considered contravening regulations set out above.

The proposal to site the substation adjacent to an ancient woodland, Carlton Wood, with cable access down the B1164 which dissects the woodland, will cause catastrophic destruction to the wood and therefore to wildlife; for clarity, Carlton Wood is both sides of the B1164. The Governments advisory body, the Forestry Commission, state no infrastructure be placed within 15 metres of ancient woodland; the B1164 is not wide enough. The cable channels must be a minimum of 1.5 metres deep; this will impact on roots and kill trees. Clearly the woodland **will** be affected however Carlton Wood has been excluded from the Environmental Impact Assessment (EIA) by the applicant.²

Regulation 14 of the EIA Regulations 2017 requires that: -

(2) *An environmental statement is a statement which includes **at least...***

(b) a description of the likely significant effects of the proposed development on the environment;

¹ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 < [The Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#) > accessed 23rd July 2026

² Carlton-on-Trent Parish Council, Great North Road Solar & Biodiversity Park – EN010162 (document ref EN010162-001205-CoT-PC_Combined, 2026) 2, bullets 4 and 8; 5, para 2 < [EN010162-001205-CoT-PC_Combined.pdf](#) > accessed 23rd July 2026

- (c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- (d) a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;
- (e) a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and
- (f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.³

This has not been complied with. The applicant does not describe “likely significant effects of the proposed development on the environment” or the ancient woodland. Neither do they apply Section 2(c) “prevent or reduce and, if possible, offset likely significant adverse effects on the environment”⁴, despite laying cabling in the woodland the applicant has excluded Carlton Wood from the EIA entirely.

Not only was this site poorly chosen, no “reasonable alternatives” have been shown in the application or discussed throughout consultation. There is nothing to indicate why the applicant selected this as a better ‘option’ instead of any other because there were no other considered sites. This absence diminishes confidence that the chosen locations represent the options with the least environmental impact.

Micro siting will not remedy this situation.

The applicant refers to flexibility through micro siting however this can only accommodate small adjustments to the proposed project. The distinction is significant because the Environmental Impact Assessment processes the consideration of reasonable alternatives before the preferred option is a fixed decision. As acknowledged by the High Court in *Lullington Solar Park Ltd v Secretary of State for Levelling Up, Housing and Communities* [2024], applicants are expected to adopt a rational and evidence based approach to site selection, particularly where environmentally preferable alternatives may be available.⁵ While each case is determined on its specific facts, this principle emphasises that micro siting should not be viewed as a substitute for a comprehensive assessment of alternative locations, especially when the environmental impacts are directly related to the land chosen.

In the interest of clarity: Initially, two substations were identified for Carlton-on-Tent. One substation was removed as the applicant realised the field was subjected to flooding for most of the winter months. The substation proposed adjacent to Carlton Woods is not instead of this one.

The pre-application phase is the essential means by which an applicant informs the public of their intent, the pitfalls, their alternative considerations and remedial actions to mitigate.

The guidance on the pre-application stage for NSIP projects (Reference ID 02-004-20240430) describes the pre-application process as:

“The NSIP consenting process is intended to be front-loaded. The pre-application stage is therefore critical and should be used to ensure project proposals are prepared in line with

³ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 SI 2017/572, reg 14

⁴ Ibid.

⁵ *Lullington Solar Park Ltd v Secretary of State for Levelling Up, Housing and Communities* [2024] EWHC 573

*applicable National Policy Statements (NPS) designated under Part 2 of the Planning Act. Relevant legislation and policies should also be taken into consideration where applicable to the proposed project. The pre-application stage should allow the likely effects of a project to be **fully consulted upon**, with the design of the project **evolving** up to the point of application submission.*

*The overriding objective of this guidance is to encourage a pre-application process which is **effective and proportionate** to the nature of the proposed project. This must ensure that the legal requirements of the Planning Act and the EIA Regulations 2017 are met, particularly involving consultation stages and the **early consideration of alternatives**. At the same time, pre-application processes should not be unnecessarily time-consuming and burdensome for the applicant, consultees and communities affected by the proposal.”⁶ (my bold)*

At no time were alternative presented to the public for consideration therefore the applicant failed to fulfil statutory requirements as set out in the guidance to enable compliance with planning law.

Throughout Carlton-on-Trent Parish Council have fully engaged with the applicant, making reasonable suggestions which have been ignored and then unsatisfactorily discounted.

National Policy Statement for Renewable Energy Infrastructure (EN-3) says that factors influencing site selection and design are relevant for consideration of the proposed development.⁷

Carlton-on-Trent already has a substation. The applicant has only recently (18.06.26) offered the explanation that this would not have been suitable in the first instance because:

“GNR has an agreed connection with NESO to the 400 kV national transmission network at Staythorpe. This connection was the starting point for the project’s electrical design. We do not have an agreement to connect GNR through the existing Carlton substation.”⁸

Carlton-on-Trent Parish Council is advocating co-location of the applicant’s substation with the current substation. The applicant has failed to consider this option.

The project may have been initiated by the connection to the grid at Staythorpe, but this does not align with the principle of “*the design of the project evolving*” up to the point of submission as per preapplication guidance; clearly the applicant had decisions which were not going to change upon consultation.

The applicant has retrospectively discounted the current substation; this is not what is required in the planning process. By failing to consider the **site** and demonstrate through the EIA that this has been discounted the applicant has failed in a key principle of the pre application phase. The site would accommodate a further substation, while this would still have a negative impact on our surroundings, in the long term this would be less detrimental than the current proposal. See email communication for reasons.

⁶ Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, Planning Act 2008: Pre-application Stage for Nationally Significant Infrastructure Projects (GOV.UK, 30 April 2024) <[Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects - GOV.UK](https://assets.publishing.service.gov.uk/media/64252f5f2fa848000cec0f52/NPS_EN-3.pdf) > accessed 23rd July 2026

⁷ Department for Energy Security and Net Zero, National Policy Statement for Renewable Energy Infrastructure (EN-3)(CP 754, March 2023) <https://assets.publishing.service.gov.uk/media/64252f5f2fa848000cec0f52/NPS_EN-3.pdf > accessed 23rd July 2026

⁸ See email Appendix 1/below

The site complies with the same criteria for selection employed by the applicant:

- *Technical & Commercial Feasibility: The proximity of the proposed onsite substation to the existing grid infrastructure (to minimize transmission losses).*

The site is less than 145metres away than the previously discarded site, therefore minimum cabling required to make this a financially viable option, and under 100 metres away from the closest panels therefore minimising transmission losses.

- *Environmental & Spatial Constraints: Siting substations outside of flood zones, away from Best and Most Vertically (BMV) agricultural land, and outside of heritage or ecologically sensitive areas.*

The land is not in a flood zone, it is on the same grade land as currently proposed and outside of heritage or ecologically sensitive areas. The land is between the A1 and the railway.

Furthermore, the site has additional advantages of already having vehicular access and hard standing, with security fencing that could be extended if required, **and** it would not impact and partially destroy an ancient woodland.

This is the most obvious site for the applicant to have considered, but there are also several others.

National Policy Statement for Renewable Energy Infrastructure (EN-3) PS

Section 3.2.2 says:

Applicants should take these policies and guidance (including any relevant targets) into account and explain how their proposals fit with guidance or, alternatively, why they depart from them.

And Section 3.2.3 says

The Secretary of State should also have regard to these policies and guidance (including any relevant targets) in its decision making.⁹

Factors influencing site selection and design are relevant to the consideration of the proposed development.

The Planning Act 2008 Section 104:

(2) In deciding the application, the Secretary of State must have regard to
(a) any national policy statement which has effect in relation to development of the description to which the application relates (a "relevant national policy statement"),
(b) any local impact report (within the meaning given by section 60(3)) submitted to the Secretary of State before the deadline specified in a notice under section 60(2),

(3) The Secretary of State must decide the application in accordance with any relevant national policy statement.

⁹ Department for Energy Security and Net Zero, National Policy Statement for Renewable Energy Infrastructure (EN-3)(CP 754, March 2023) < https://assets.publishing.service.gov.uk/media/64252f5f2fa848000cec0f52/NPS_EN-3.pdf > accessed 23rd July 2026

(3A) In particular, if a relevant national policy statement contains a biodiversity gain statement under Schedule 2A in relation to development of the description to which the application relates, the Secretary of State may not grant the application unless satisfied that the biodiversity gain objective contained in the statement is met in relation to the development to which the application relates.¹⁰

It is evident that the adverse effects of this site selection far outweigh any positive. The destruction of a woodland of 400+ years and the biodiversity that it contains, cannot be replicated in 40 years. The harm does not outweigh any benefit.

I trust you will give this matter your prompt and thorough attention.

Yours sincerely,

[REDACTED]

Chair and representing Carlton-on-Trent Parish Council

Appendix 1

Email chain to and from Carlton-on-Trent Parish Council and Elements Green

Re: Carlton on Trent Parish Council enquiry – Substation proposal adjacent to Carlton Wood

[REDACTED]

To: info@gnrsolarpark.co.uk

Cc: clerk@carltonontrent-pc.gov.uk

Subject: Re: Substation, Traffic & Noise and, Water displaced by panels at Carlton-on-Trent

H [REDACTED]

We have a Parish Council meeting coming up and it would be good to give them an update.

Re the Substation proposed adjacent to Carlton Wood:

I have received an email from East Midlands National Grid that says no other sites were considered by Elements Green for the substation other than the one proposed adjacent to Carlton Wood.

This raises several concerns, not least of which how has Elements Green mitigated wherever possible.

Any justification to disregard this site would need to be offset against the benefits to our community and wildlife - in perpetuity

The simplest solution in this scenario, would be to utilise the substation already in existence, and yet this possibility has not been considered.

A speedy response, would be appreciated.

Kind regards,

[REDACTED]

Chair Carlton-on-Trent Parish Council

¹⁰ Planning Act 2008, s 104 (2), (3) and (3A)

From: [REDACTED]
To: [REDACTED] <[REDACTED]clerk@carltonontrent-pc.gov.uk>

Date: June 18, 2026, 12:10 PM

Subject: Re: Carlton on Trent Parish Council enquiry – Substation proposal adjacent to Carlton Wood

Good afternoon [REDACTED]

I hope you're well? Counter Context has forwarded your enquiry to us. Thank you for raising your concerns.

There are two different types of substation involved.

The existing substation near Carlton is part of the local electricity distribution network. Elements Green does not own or control it. GNR is not connecting through the local distribution network.

GNR has an agreed connection with NESO to the 400 kV national transmission network at Staythorpe. This connection was the starting point for the project's electrical design. We do not have an agreement to connect GNR through the existing Carlton substation.

The existing Carlton substation was not overlooked. We did not approach National Grid Electricity Distribution about using it because it was not a technically viable option for GNR.

The proposed substation near Carlton Wood performs a specific role within the GNR project. It will collect electricity from the surrounding solar areas at 33 kV and increase it to 132 kV before sending it towards GNR's central 400 kV substation. The existing Carlton substation is part of a separate network and could not simply be used in its place.

Using the existing substation would have meant seeking a different grid connection, redesigning the project's electrical network and potentially requiring major changes to the local distribution network. This would not have been an alternative location for the same substation. It would have been a completely different connection strategy.

For those reasons, it was ruled out before any request to use the asset was necessary.

More Information:

GNR will use the existing National Grid transmission substation at Staythorpe as its final connection point. The proposed substation near Carlton Wood is one of four intermediate substations needed across the project.

Electricity generated by the solar panels will first be collected at 33 kV. The four intermediate substations will increase this to 132 kV, with each expected to handle around 200 MW. The electricity will then travel to the project's central substation, where it will be increased to 400 kV before entering the national transmission network at Staythorpe.

This design is needed to move the project's 800 MW output safely and efficiently across the site. It reduces electrical losses and avoids sending the project's full output through one substation or cable.

We recognise the concerns about the proposed location near Carlton Wood. The project design includes measures to reduce environmental and visual effects. These include new habitat around the wood and woodland planting around the proposed substation, which will provide screening as it matures.

Further information is available in Chapter 4 of the Environmental Statement on the Planning Inspectorate website. The document reference is [EN010162-000192-GNR 6.2.4 ES Ch 04 Alternatives.pdf](#).

Kind regards,



To: <akm@elementsgreen.com><clerk@carltonontrent-pc.gov.uk><info@gnrsolarpark.co.uk>

July 24, 10:31 AM



1

H [REDACTED]

Thank you for your response below, this was raised at our council meeting earlier this month - having missed the June meeting.

Could you please clarify who are 'Counter Context' and where do they fit into the scheme?
My email had been sent to Elements Green (EG).

Location choice for Substation

We appreciate the process of connection into the grid will have issues the layperson may not be aware of. That said it is incumbent on EG to mitigation measures thoroughly and considered the long term effect – especially when a substation is NOT going to be decommissioned but remains in perpetuity.

We are still of the view this has not happened.

You say the starting point for the project was the agreed connection with NESO to the 400 kV national transmission network at Staythorpe, this agreement does not prevent EG following process and minimising negative impact where possible. You have explained how the project evolved and changed aspects of the scheme, it is not unreasonable therefore that alternative connections should be negotiated to minimise negative effects, even if for just a portion of the scheme. Despite having an agreement to connect at Staythorpe, the method of reaching that connection was open to options, due diligence would have expected at the very least considering the possibility liaising with East Midlands National Grid and using the Carlton-on-Trent substation – it could have resolved several issues relating to protecting the ancient woodland, the environment and the long-term impact.

You acknowledge this has not been done.

Alternative site selection

I can find no information to show you considered other sites for the substation currently proposed adjacent to Carlton Wood. The link below did not reveal any alternative sites. Please note including a link to another document is only helpful if you then identify which page and paragraph to go to.

You say use of the existing substation was not viable, however, you have not explained why you could not use the site and/or the area around the existing substation. As previously stated, screening already exists, this could be extended if required, but would provide a speedier solution to starting with nothing as you propose; planned tree planting will take 40+ years to establish. Potentially cabling would need extending – dependant on route taken to Staythorpe - but this would be a small consideration if it protects and prevents destruction of the ancient woodland. Any additional costs would be saved by use of the existing access, hard standing and security

Why was our local knowledge never sought before? We believe this should have been discussed properly at the numerous consultation events we attended. We have become aware that EG won an award for their consultation. [Winning Campaign of the Year at The Energy Awards 2026](#)

Clearly, we do not feel EG have listened to the residents as much as these judges do.
Who nominated you for the award?

What information was submitted to enable a full and comprehensive judgement?

Other queries which remain unanswered.

Looking at the email forwarded, you may not realise there are still several queries that remain unaddressed; in some instances we have had partial answers.
In the interest of clarity and transparency please retain the email chain.

- Could you indicate how much **acreage** is expected to be covered by the substation?
- Do you know where in the field you plan to put the substation?
- How **deep** will the cable trenches be? We understand maximum width will be 12 + (2 x 9)= 30 m working corridor, this is very wide! The depth will indicate how much soil is being removed.
- **Where** will the soil be transported to? This is to indicate additional traffic movements.
- Where the cables to and from the substation will be routed? Please provide a map - without the 'red line' - showing the proposed cable route, we are unable to discern where this is planned due to the redline on maps with the documents. We are also unclear of the direction of energy flow given the 'doughnut' nature of the project, could you please show this.
- Once decommissioned in 40 years will **ALL** the cabling linked to solar panels that are no longer there (and associated infrastructure) be completely removed out of the ground?

I am sure you can appreciate our concerns and our need to be able to satisfy residents that all is being done to reduce impact on our community, now and in the future.
Thank you anticipation.

Kind regards,



Chair Carlton-on-Trent Parish Council