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14 September 2026

Dear John Wheadon,

Application by Elements Green Trent Limited: Great North Road Solar and Biodiversity Park (Application Reference: EN010162) - Responses to Secretary of State's Request for Information

We write to provide Elements Green Trent Limited ("the Applicant") written responses to the Secretary of State's Request for Information dated 27 August 2026, issued following receipt of the Examining Authority's Report and Recommendation for the above application.

The Secretary of State requested further information on a number of matters to assist in the determination of the application. This submission provides the Applicant's response to those requests.

For ease of reference, the information requested by the Secretary of State and the Applicant's corresponding responses are set out in **Table 1** accompanying this letter. The Applicant has sought to address each matter raised and, where appropriate, has provided supporting information and clarification.

We trust this information is useful. Please do not hesitate to contact us if you require any further details.



Head of Planning
Elements Green Trent Limited
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Table 1 Applicant's Responses to the Secretary of State's Request for Information

	Secretary of State's Request For Information	Applicant's Responses
Land Powers		
3	The Applicant and National Grid Electricity Transmission plc (NGET) are requested to provide updates regarding whether protective provisions have now been agreed and whether NGET has any outstanding objections [REP6-074] .	Since the close of the Examination, the Applicant has continued to engage with NGET with respect to the interface between the Proposed Development and NGET's interests, including The National Grid Electricity Transmission (West Burton to Ratcliffe-on-Soar Refurbishment Project) Compulsory Purchase Order 2026 (the "CPO") made in connection with the refurbishment of the existing 400kV single circuits between West Burton to High Marnham, High Marnham to Stoke Bardolph, Ratcliffe-on-Soar to Stoke Bardolph and Cottam to Staythorpe (the "NGET Refurbishment Works"). The terms of an agreement to manage the interface between the Proposed Development and the NGET Refurbishment Works have been progressing through this engagement. It is anticipated that this agreement will supplement the protective provisions. Given that the interface relationship will be managed through that separate agreement, the Applicant maintains that the protective provisions for the benefit of NGET in Part 7 of Schedule 13 of the Draft Development Consent Order [EN010162/APP/3.1G] [REP6-004] at the close of the Examination are proportionate to protect NGET's interests in the context of the Proposed Development and as such are in the appropriate form.
4	The Applicant and National Gas Transmission (NGT) are requested to provide updates regarding whether agreement has been reached between the parties	The Applicant has continued to engage with NGT since the close of the Examination. The terms of a side agreement addressing commercial issues have progressed positively, and the Applicant is confident that with continued discussion the few remaining issues will be resolved in short

	following NGT's submission at close of examination [REP6-069].	order. Issues remaining to be settled include finalising plans of affected apparatus and undertaking an initial survey thereof. The Applicant maintains that the protective provisions for the benefit of NGT at Part 8 of Schedule 13 to the Draft Development Consent Order [EN010162/APP/3.1G] [REP6-004] at the close of the examination are proportionate to address NGT's interests in the context of the Proposed Development and as such are in the appropriate form.
5	The Applicant and Network Rail are requested to provide updates regarding whether protective provisions have been agreed [AS-090].	The Applicant has continued to proactively seek Network Rail's engagement on suitable protective provisions since the close of examination, together with a side agreement addressing commercial issues. On 14 September 2026, Network Rail provided responses on most of the points which remain to be agreed between the parties. The Applicant expects to resolve the remaining points, which amount to confirming three definitions, in short order, subject to Network Rail providing its remaining comments and continuing to engage with the Applicant. The Applicant maintains that the protective provisions for the benefit of Network Rail at Part 3 of Schedule 13 to the Draft Development Consent Order [EN010162/APP/3.1G] [REP6-004] at the close of the examination are proportionate to address Network Rail's interests in the context of the Proposed Development and as such are in the appropriate form.
6	The Applicant and RWE Generation Ltd are requested to confirm whether agreement has now been reached and whether RWE Generation Ltd's objections (October and December 2025) no longer stand.	The Applicant has reached agreement with RWE Generation Ltd in the form of a unilateral undertaking to address RWE's concerns and RWE on 30 June 2026 formally withdrew its representations to the Application [PIR-002].

Discharge of Requirements

7 The Applicant, Nottinghamshire County Council and Newark and Sherwood District Council are requested to provide updates on whether timescales and fees for the discharge of DCO requirements, and written approvals related to them, have been agreed [REP6-066] [REP6-042].	No further updates have been provided since the close of the examination. The Applicant has reached agreement on the matters set out within the Draft Development Consent Order [EN010162/APP/3.1G] [REP6-004] with NCC and NSDC, except for matters relating to the timescales for discharging requirements, along with the fees to discharge requirements. For the avoidance of doubt, the Applicant's view is that the timescales and fees for the discharge of DCO requirement included in the Draft Development Consent Order [EN010162/APP/3.1G] [REP6-004] are consistent with the precedent schemes, including the Helios DCO and the Stonestreet Green DCO. The Applicant's position is set out in its response to Action Point 2 of the Written Summary of Oral Submissions from Issue Specific Hearing 2 and Response to Action Points [EN01016s2/APP/8.24] [REP3-099]. As set out on page 26 of the Written Summary of Oral Submissions from Issue Specific Hearing 2 and Response to Action Points [EN01016s2/APP/8.24] [REP3-099], the Applicant responded: <i>"The Applicant notes that the Helios DCO includes a period of 8 weeks, which reflects the urgent need for the project. The Applicant and NSDC have continued to engage on this matter and NSDC consider that notification of a decision within 10 weeks as a standard approach is insufficient. NSDC and NCC are particularly concerned with the resourcing of such requirements and therefore consider that a more appropriate default period equating to Major EIA development for a planning application of 16 weeks is more appropriate. The Applicant's view is that the Helios DCO, and Stonestreet Green DCO, provide relevant and up to date precedent where a period of 8 weeks is considered reasonable and appropriate. The Applicant also notes that the</i>
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		<i>Draft DCO [EN010162/APP/3.1D] includes a suggested fee schedule that goes beyond what precedent DCOs have established. NSDC have confirmed that they remain of the view that the fees set out in the DCO, or that in the TCPA regime would not be sufficient. The Applicant's view is that the Helios DCO, and Stonestreet Green DCO, provide relevant and up to date precedent which confirms that NSDC's view is not consistent with these precedents. The Applicant notes that NCC have agreed with the Applicant's approach to application fees, and this agreement is set out within the Draft Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1B]."</i>
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Glint and glare

8	The Applicant and Nottinghamshire County Council are invited to comment on the following amendment to Requirement 22 concerning the glint and glare mitigation strategy, sought by National Highways [REP6-076], shown as underlined: <i>No phase of the authorised development may commence until a glint and glare mitigation strategy for that phase has been submitted to and approved by the planning authority <u>and National Highways in respect of matters which concern the strategic road network.</u> in consultation with National Highways.</i>	The Applicant notes National Highways' proposed amendment to Requirement 22, which would in practice require approval of the glint and glare mitigation strategy by both the planning authority and National Highways in relation to matters affecting the strategic road network ("SRN"). As set out in ES Volume 4, Appendix 16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] [APP-286], the assessment identified limited exceedances of the applicable criteria for sections of the A1 (northbound), A616 (north-westbound) and A617 in the absence of mitigation. Appropriate mitigation measures have been identified and secured through Requirement 22, reducing effects to an acceptable level. Table 2.5 of the Final Statement of Common Ground with National Highways [EN010162/APP/8.4D] [REP6-044] records agreement between the parties on the technical assessment and mitigation approach. The sole area of disagreement relates to whether National Highways should be an approving authority for Requirement 22 rather than a consultee. The Applicant considers that it is appropriate for National Highways to be consulted on the discharge of Requirement 22 in relation to matters
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affecting the SRN, with the planning authority remaining the approving authority.

The Applicant does not consider it necessary or proportionate for National Highways to become an approving authority. The purpose of Requirement 22 is to secure the implementation of mitigation measures that have already been assessed and agreed through the examination process. Nottinghamshire County Council, as the discharging authority, can be relied upon to give proper regard to any representations made by National Highways concerning potential effects on the SRN before determining an application for discharge.

In addition, the Proposed Development does not include works within, or alterations to, the SRN itself. The Applicant therefore considers that consultation with National Highways provides an appropriate and effective mechanism for ensuring its continued involvement in matters affecting the SRN.

Requiring approval from both Nottinghamshire County Council and National Highways would introduce an additional regulatory step which is not necessary to make the Proposed Development acceptable in planning terms. In circumstances where the assessment and mitigation strategy are agreed, such an approach would create additional complexity in the discharge process without any corresponding planning benefit.

The Applicant also notes the importance which Government policy attaches to the timely delivery of nationally significant solar infrastructure. The Proposed Development is a nationally significant solar generating station for which the relevant National Policy Statements establish a clear and urgent need. In those circumstances, the Applicant considers that introducing an additional approval body would be disproportionate and risks unnecessary delay without providing any additional protection to the operation or safety of the SRN.

For these reasons, the Applicant does not support the proposed amendment to Requirement 22 by National Highways and considers the existing drafting, whereby Nottinghamshire County Council approves the strategy following consultation with National Highways, to be appropriate.

Woodland planting on Best and Most Versatile (BMV) land

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| <p>9 Natural England raised concerns during the Examination [RR-154] regarding the potential permanent loss of BMV land arising from the proposed woodland creation as part of the mitigation and enhancement proposals for the proposed development. The Applicant is requested to provide further justification for the proposed woodland creation habitat and the rationale for selecting this habitat type in preference to alternative mitigation or enhancement measures.</p> | <p>The proposed woodland planting includes community orchard, woodland, woodland pasture and planting buffers. As set out in Section 7 of the BMV Avoidance: Micro-siting Analysis [EN010162/APP/8.35] [AS-092], woodland planting on BMV land is related to Woodland 157, Woodland 52, Woodland Pasture Area, and Woodland 470. The location of these areas is shown in Appendix 2 of the Micro-siting Analysis.</p> <p>This habitat type was selected on these parcels because it delivers long-term biodiversity benefits. Table 8.9 of the ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8D] [REP6-019] sets out the justification for woodland creation in these locations, identifying it as both mitigation and enhancement for likely effects on Local Wildlife Sites (LWS), particularly North Wood LWS and Lake Plantation LWS, as well as on other retained woodlands. The proposed woodland would strengthen connectivity between the LWS and other woodlands. As stated in Section 8.8.6.4 at paragraph 207 of ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8D] [REP6-019], the proposed woodland creation habitat is considered to also contribute to securing additional biodiversity net gain for habitats and will result in significant beneficial effects on habitats at a Local scale.</p> <p>These benefits are amongst (and will contribute towards) the significant beneficial effects of the Proposed Development. When considered alongside the Development's contribution to meeting the urgent national need for secure, affordable and low-carbon energy infrastructure, the long-term biodiversity benefits delivered by woodland creation justify its</p> |
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selection in preference to alternative mitigation or enhancement measures.

As set out in the **Final Statement of Common Ground with Natural England [EN010162/APP/8.6C]** [\[REP6-048\]](#), woodland planting does not disturb the soil and land quality resource, as trees are planted straight into the soil. The loss considered by Natural England results from a likely permanent land use change.

It is noted that only 1.0 ha proposed for tree planting is Grade 2. The majority, 21.4 ha, is Subgrade 3a.

Natural England and the Forestry Commission's "Joint Statement on Woodland Creation" (April 2023) (attached) wishes to see woodland cover increase from 14.5% (2023) to 16.5% by 2050. On page 2 it is noted that "we encourage woodland creation proposals on sites that:" (inter alia) "are on agricultural land classes 3a, 3b, 4 and 5". Woodland creation does not ordinarily constitute "development" for the purposes of the Town and Country Planning Act 1990 and therefore will not generally require planning permission or development consent.

The use of BMV land is restricted mostly to Subgrade 3a, with the loss of 1ha of Grade 2 land associated only with Woodland 52. As explained in paragraph 7.1.3 of **BMV Avoidance: Micro-siting Analysis [EN010162/APP/8.35]** [\[AS-092\]](#), Woodland 52 is a small triangular field that forms an extension to an existing wood. The majority of Woodland 52 area comprises Subgrade 3a land, with only 1 ha of Grade 2 BMV land. Given the shape and size of the field, and the fact that the remainder of the field would be occupied by the proposed woodland, the retained Grade 2 land would not be capable of being farmed as a standalone field. The actual effects (in respect of useable farmland) are therefore limited, and NE's position statement does not raise concerns about tree planting on Subgrade 3a.

	The use of BMV land has been balanced against the benefits in respect of ecology and landscape. The actual effects (in respect of useable farmland) are limited, as set out in the BMV Micro-Siting Analysis, and NE's position statement does not raise concerns about tree planting on Subgrade 3a. Against this, the Applicant notes: (i) it would be possible to plant trees on lower-quality land, but the benefits (in respect of ecology and landscape) would be reduced; (ii) therefore, as described in the BMV Micro-Siting analysis document, the use of BMV land has been balanced against the benefits; (iii) the use of BMV land is restricted mostly to Subgrade 3a.
10	The Secretary of State notes Natural England's suggestion that the proposed woodland creation could be located on land of lower agricultural quality [REP4-066], and the Applicant's response acknowledging this option [REP6-048]. The Applicant is also requested to provide further justification for the proposed location of the woodland creation habitat, including whether alternative locations on land of lower agricultural quality were explored and, if so, the reasons for selecting the proposed approach, along with the location plans of these alternative locations. Please refer to the Applicant's position on this in Section 4.2 of the Closing Statement [EN010162/APP/8.33] [REP6-064], at paragraphs 4.2.11 to 4.2.19. It is accepted that 1.0 ha of Grade 2 land and 21.4 ha of Subgrade 3a land would be used for habitat creation, resulting in a change in land use from agricultural land to woodland. However, it is not considered that the effect of this land use change would be so significant as to outweigh the ecological and landscape benefits outlined above, together with the wider benefits of the Proposed Development. As stated in paragraph 4.2.14 of the Closing Statement [EN010162/APP/8.33] [REP6-064], woodland planting does not disturb the soil or land quality resource, as trees are planted directly into the soil. Woodland planting on BMV land would therefore not result in adverse effects related to soil degradation. The Applicant considers that the treatment of woodland planting on BMV land does not conflict with the land use policies set out in NPS EN-1 and

	NPS EN-3 regarding the preference for the use of non-agricultural land. Paragraph 4.2.12 of the Closing Statement [EN010162/APP/8.33] [REP6-064] states that <i>"The Applicant has applied this policy by seeking, where practicable, to avoid BMV land with preference given to the use of land in areas of poorer quality and, in particular, avoiding / minimising the use of Grade 1 and Grade 2 land. Although ALC was taken into account as one of the influencing factors in the site selection process, NPS EN-3 (paragraph 2.10.29 and 2.10.21 of the 2025 version) states that land type should not be a predominating factor in determining the suitability of the site location"</i>. In addition, the use of BMV land is restricted mostly to Subgrade 3a with 1.0 ha of Grade 2 and 21.4 ha of Subgrade 3a. The actual effects (in respect of useable farmland) are limited, as set out in the BMV Avoidance: Micro-siting Analysis [EN010162/APP/8.35] [AS-092]. Overall, the limited inclusion of BMV land for woodland planting is justified, therefore, it is considered that there is no need to consider planting trees on lower-quality land. Any limited harm arising from this worst-case permanent loss of BMV land to retain would be outweighed by the substantial public benefits of the Proposed Development, including its contribution to meeting the urgent need for low-carbon energy infrastructure, delivering benefits at the national scale, in accordance with the objectives of NPS EN-1 and NPS EN-3.
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Biodiversity Net Gain (BNG)

11	The Secretary of State notes that the application documentation does not include the full BNG Metric. Whilst headline results have been provided within the BNG Assessment [Document reference 6.4.8.13D], the detailed metric calculations have not been	The Applicant has provided the full statutory BNG metric calculation tool with this submission, as set out in ES Volume 4, Appendix A8.13.1: Full Statutory Biodiversity Net Gain (BNG) Metric V1.4 [EN010162/APP/6.4.8.13.1].
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supplied. The **Applicant** is therefore requested to provide the full statutory BNG metric calculation tool.

Ecological data sharing

12	The Applicant is invited to revise the outline Landscape and Ecological Management Plan (oLEMP) and outline Construction Environmental Management Plan (oCEMP) to provide that pre-construction, construction and post-construction and operational survey and monitoring data is regularly shared in the appropriate formats with the relevant Local Environmental Records Centre(s) and relevant national and regional environmental recording schemes.	The Applicant has carefully reviewed this suggestion and confirms it is agreed. The commitment has been added to Section A5.1.5.7 (Monitoring) of the ES Volume 4, Appendix A5.1: Outline Landscape and Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1G], as follows: <i>“Pre-construction, construction, post-construction and operational survey and monitoring data generated following consent will be shared in the appropriate formats with the Nottinghamshire Biological and Geological Records Centre (NBGRC) and relevant national and regional environmental recording schemes, if the NBGRC does not share data with such schemes.”</i> This commitment will ensure that, alongside the commitment already included in the oLEMP to submit monitoring reports to the LPA, ecological survey and monitoring data will also be shared in the appropriate format with the Nottinghamshire Biological and Geological Records Centre (NBGRC) and relevant national and regional environmental recording schemes. This commitment of sharing pre-construction and construction survey and monitoring data is also reflected in Section A5.3.11.1.6 (Communication) of the ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3E].
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Public Rights of Way

13	The Secretary of State notes the request by the Nottinghamshire Area Ramblers for three historic cross-field Public Rights of Way to be restored to their original alignments during decommissioning [REP5-049]. Nottinghamshire Area Ramblers is requested to confirm if any of these Rights of Way constitute any part of the Robin Hood Way or Trent Valley Way. Nottinghamshire County Council and the Applicant are requested to provide further information regarding the Applicant's response that the significance of the historical alignments would not, in itself, necessitate their reinstatement, particularly where doing so could adversely affect the efficient use of agricultural land [REP6-064].	The Applicant has addressed this matter in the following responses report: - Table 3-3 of Responses to Deadline 5 Submissions Report within Appendix 1 of the Closing Statement [EN010162/APP/8.33] [REP6-064] - Table 3-6 of Responses to Deadline 3 Submissions [EN010162/APP/8.29] [REP4-059], at page 54-58 The Applicant also sets out responses to the three questions below. <u>1: Do any of the Rights of Way form part of the Robin Hood Way or Trent Valley Way?</u> The Applicant is not aware that any of the affected Rights of Way form part of, or are in close proximity to, the Robin Hood Way or the Trent Valley Way. The Rights of Way in question are Weston FP10 and Carlton-on-Trent FP6 and FP10, and shown on Sheet 25 and Sheet 32 of the Public Rights of Way Diversions and Permissive Routes Plan [EN010162/APP/2.4C] [REP5-004]. <u>2: Could these PRowS be restored to their original alignment as part of the decommissioning works?</u> As agreed with NCC, Section A5.6.2.4 of the ES Volume 4, Appendix A5.6: Outline Decommissioning and Restoration Plan (DRP)[EN010162/APP/6.4.5.6C] [REP4-021] includes a commitment that before the submission of the final DRP, the Applicant will carry out a review of the Public Rights of Way (PRowS) within the Order Limits, in consultation with Nottinghamshire County Council. Should it be deemed that any PRowS would better be re-located, whether back to their original alignment or otherwise, the Applicant will apply for these changes to be made through the required process at that time. This commitment is secured in the ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6C] [REP4-021] and is secured via Requirement 19 of the Draft Development Consent Order
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	[EN010162/APP/3.1E] [REP6-004]. The agreed position with Nottinghamshire County Council on the approach to diversion of PRowS is set out in Table 2.6, Row 2.6.5 of the Final Statement of Common Ground with Nottinghamshire County Council [EN010162/APP/8.1D] [REP6-040]. It is therefore possible for any of the PRowS to be reinstated back to their original alignment in accordance with the commitment secured through the ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6C] [REP4-021]. <u>3: Does the historic alignment of the Rights of Way necessitate their reinstatement?</u> As noted in the Applicant's response above, the Rights of Way are not part of Robin Hood Way or Trent Valley Way, or understood to have particular historical significance. It is the Applicant's view that the commitment set out in ES Volume 4, Appendix A5.6: Outline DRP [EN010162/APP/6.4.5.6C] [REP4-021], and secured via Requirement 19 of the Draft Development Consent Order [EN010162/APP/3.1E] [REP6-004] is an appropriate control, and which is wholly consistent with NPS policy.
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Site Selection

14	The Applicant is requested to provide details of the site selection process and consideration of alternatives for intermediate substations [PIR-003].	The intermediate substation in question is the proposed Ossington Road Intermediate Substation which forms part of Work No. 4 (Intermediate Substations) and is shown on the Works Plans [EN010162/APP/2.3A] [AS-005], Sheet 31. For ease of reference, the proposed Ossington Road Intermediate Substation is referred to as the "GNR Intermediate Substation" in this response. The GNR Intermediate Substation is located along Ossington Road, to the south of the proposed solar arrays. It is situated to the west of the ecological enhancement area, which essentially extends north-east from Carlton Wood.
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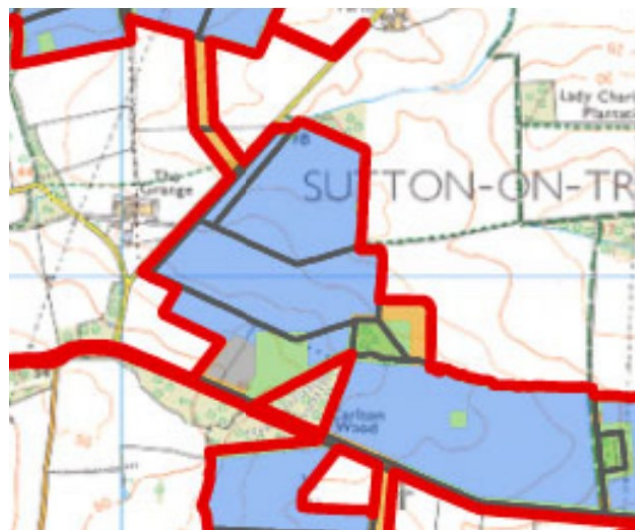


Figure 1: Extract from ES Volume 3, Figure 5.1: Works Areas [EN010162/APP/6.3.5D] [REP5-015] (Grey – GNR Intermediate Substation; Green - Mitigation/Enhancement; Blue – Solar PV).

ES Volume 2, Chapter 8: Ecology and Biodiversity [EN010162/APP/6.2.8D] [REP6-019] confirms that the Proposed Development would not result in any significant effects on Carlton Wood and the ancient woodland. 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 pages 19 and 20. The Applicant would like to reiterate that there are no physical works proposed at Carlton Wood, nor within the ancient woodland, and **ES Volume 4, Appendix A5.3: Outline Construction Environmental Management Plan (CEMP)** [EN010162/APP/6.4.5.3E] includes a commitment to maintain a 15m buffer from the woodland boundary to ensure that there are no unacceptable effects on the ancient woodland.

Therefore, the Parish Council's assertion that the Proposed Development would cause the "catastrophic destruction to the wood and therefore to wildlife" is not supported by any assessment or evidence that has been submitted to the Examination. The Applicant notes that such a conclusion is not consistent with the findings of the Environmental Statement, which have been reviewed and agreed by the relevant statutory environmental bodies, as set out in Table 2-2 of **Final Statement of Common Ground with the Environment Agency [EN010162/APP/8.3D]** [\[REP5-032\]](#) and Table 2-4 of **Final Statement of Common Ground with Newark and Sherwood District Council [EN010162/APP/8.2D]** [\[REP6-042\]](#).

Given that no significant effects have been identified on Carlton Wood, there is no necessity to consider alternatives. Nevertheless, the Applicant has considered reasonable alternatives and set out adequate details in the Application and relevant examination materials, as summarised below.

The Applicant does not agree with the Parish Council's suggestion of co-locating the GNR Intermediate Substation with the existing Carlton Substation. The existing Carlton Substation functions as an electricity distribution substation, which distributes energy coming from the grid to users. Whereas, the GNR Intermediate Substation serves a different purpose. As described in Section 6.2.4 of the **Design Approach Document [EN010162/APP/5.6B]** [\[REP2-019\]](#), the GNR Intermediate Substation will transport energy generated by the Proposed Development to the GNR 400kV Substation and then to the grid connection point at Staythorpe. Co-location would not be feasible as the GNR Intermediate Substation must be functionally connected to the solar PV areas and associated cable routes.

The Applicant's approach to the siting of the GNR Intermediate Substations formed part of the iterative site selection and design evolution process described in **ES Volume 2, Chapter 4: Alternatives [EN010162/APP/6.2.4]** [\[APP-047\]](#) and in the **Design Approach**

Document [EN010162/APP/5.6B] [REP2-019]. At an early stage of the site selection process, noting that the grid connection for the Proposed Development is 800 MW (AC), it was established that four intermediate substations would be needed to distribute the load of 800 MW (AC) allowing for a headroom (i.e. not utilising the cables at full rating to maintain their performance).

Alternative locations for the intermediate substations have also been explored. The locations for the substations were constrained by various factors, including the technical considerations required to distribute the Proposed Development's 800 MW export capacity, together with consideration of environmental constraints, land availability, cable routing, access, and consultation feedback.

At the Scoping Stage, potential areas for substations were proposed as shown on the Scoping Stage Masterplan, at page 12 of the **Design Approach Document [EN010162/APP/5.6B] [REP2-019]**.

From Scoping to PEIR stage, as stated in Section 5.2.1 of the **Design Approach Document [EN010162/APP/5.6B] [REP2-019]**, the proposed Maplebeck Road intermediate substation was relocated to the southwest to reduce visibility from the local road and to take advantage of existing woodland screening. One of the two proposed intermediate substations along Lime Lane was removed to reduce visibility from the A616. The proposed Norwell Crossing substation was also removed due to the updated design proposal. The locations of the intermediate substations areas are shown on the PEIR Stage Masterplan, at page 26 of the **Design Approach Document [EN010162/APP/5.6B] [REP2-019]**.

From PEIR stage to ES, as stated in Section 8.4 of the **Design Approach Document [EN010162/APP/5.6B] [REP2-019]**, the proposed intermediate substation within the southeastern area of the Proposed Development, between Kelham and Cromwell, was removed as a result of a number of technical constraints.

This iterative design process, as described above, resulted in the current locations of the four intermediate substations shown on the **Works Plans [EN010162/APP/2.3A]** [\[AS-005\]](#). The final location of the GNR Intermediate Substation was therefore a result of an iterative design process, which took into account both technical requirements, environmental and community considerations.

Accordingly, it is considered that the topic of site selection and alternatives has been adequately explored. Furthermore, the Applicant's approach to site selection and design evolution is wholly consistent with that set out in both EN-1 and EN-3.

The Applicant made submissions on site selection and alternatives throughout the Examination. In this regard, the Applicant refers the Secretary of State as follows:

During ISH1 (paragraphs 1.4.5 to 1.4.13 of the **Written Summary of Oral Submissions from Issue Specific Hearing 1 and Responses to Action Points [EN010162/APP/8.19]** [\[REP1-068\]](#)), the Applicant explained that the site selection process was undertaken through six stages, beginning with the identification of a search area capable of accommodating approximately 2,000 hectares of solar development to deliver a direct current (DC) capacity of 1,120MW and optimise the proposed grid connection.

In its response to ExQ1 Question 12.1.1 in **Responses to ExA's First Written Questions [EN010162/APP/8.22A]** [\[REP3-096\]](#), the Applicant confirmed that the site selection process had regard to the criteria set out in Section 2.10 of NPS EN-3 (paragraphs 2.10.10 to 2.10.126) and directed the Examining Authority to paragraphs 6.3.18 to 6.3.74 of the **Planning Statement [EN010162/APP/5.4C]** [\[REP3-018\]](#).

Subsequently, in its response to ExQ2 Question 12.2.2 in **Responses to ExA's Second Written Questions [EN010162/APP/8.30]** [\[REP4-060\]](#), the Applicant explained that whilst the design development process had

been informed by a range of factors, the availability of land as an alternative to the exercise of compulsory acquisition powers is an important consideration for the purpose of the section 122(3) Planning Act 2008 compelling case in the public interest test.

As concluded in Section 6.3 of the **Planning Statement [EN010162/APP/5.4C]** [\[REP3-018\]](#), the consideration of alternatives and design evolution has been carried out in line with policy requirements and in the context of the clear and urgent need for the Proposed Development.