

Green Hill Solar Farm

EN010170

Potential Main Issues for Examination

Prepared by: Lanpro Services

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Contents

<u>1</u>	<u>Introduction</u>	<u>3</u>
1.1	Purpose of the Report	3
1.2	List of Consultees / Engagement	3
<u>2</u>	<u>Potential Main Issues for Examination</u>	<u>1</u>
2.2	Summary	13

List of Tables

Table 1: Bedford Borough Council (BBC) Potential Main Issues	1
Table 2: North Northamptonshire Council (NNC) Potential Main Issues	3
Table 3: West Northamptonshire Council (WNC) Potential Main Issues	6
Table 4: Milton Keynes (MK) Potential Main Issues	9
Table 5: Environment Agency (EA) Potential Main Issues	10
Table 6: Historic England (HE) Potential Main Issues	10
Table 7: Natural England (NE) Potential Main Issues	11
Table 8: Anglian Water Potential Main Issues	12



Issue Sheet

Report Prepared for: Green Hill Solar Farm
DCO Submission

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1 Introduction

1.1 Purpose of the Report

- 1.1.1 This Potential Main Issues for Examination ('PMIE') document has been prepared by Green Hill Solar Farm limited (the 'Applicant') to accompany an application (the Application) for a Development Consent Order (DCO) ('DCO') for the construction, operation and maintenance and decommissioning of Green Hill Solar Farm (hereafter referred to as the Scheme) with a total capacity exceeding 50 megawatts (MW).
- 1.1.2 This document has been prepared and submitted in compliance with the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (September 2024) and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') which states: "*The application must be accompanied by... any other documents considered necessary to support the application*".
- 1.1.3 The purpose of this document is to provide the Examining Authority ('ExA') with a summary of the main residual issues with key stakeholders remaining at the time of the Application submission.
- 1.1.4 The issues set out in Table 1 do not constitute a definitive list of matters likely to be raised during the DCO Examination and does not preclude stakeholders from raising further concerns during the planning process.
- 1.1.5 It is anticipated that a number of the issues outlined in this document may be resolved between the submission of the DCO Application and Examination, including once stakeholders have had an opportunity to review the DCO Application and through the evolution of application documents, including the negotiation of 'protective provisions', where necessary. It is the Applicant's intention to continue to work with stakeholders throughout the DCO Examination to resolve issues wherever possible.
- 1.1.6 The Applicant envisages that these issues can be resolved during the Examination, including through the process of producing Statements of Common Ground. The information provided within the application will inform this process and progress the discussion with the stakeholders beyond what is possible at the time of submission.

1.2 List of Consultees / Engagement

- 1.2.1 As set out in the Consultation Report **[EN010170/APP/GH5.1]** submitted with the DCO Application, the Applicant has sought to engage with the parties listed below throughout the pre-application period. This has included engagement through non-statutory and statutory consultation periods.
- 1.2.2 Following the statutory consultation, which took place between November and December 2024, the Applicant has sought to continue ongoing engagement with the parties listed below in order to discuss matters raised in their respective responses to the statutory consultation. The regard which the Applicant has had to responses to the statutory consultation is provided in the Consultation Report



Appendices **[EN010170/APP/GH5.8]** and summarised in the main Consultation Report.

- North Northamptonshire;
- West Northamptonshire;
- Milton Keynes;
- Bedford Borough Council;
- Historic England;
- Environment Agency;
- Natural England; and
- Anglian Water.



2 Potential Main Issues for Examination

- 2.1.1 **Tables 1 to 7** below provide an overview of the key representations made by each Stakeholder, where this concern is addressed in the DCO Application, and the Applicant's position on the likelihood of the issue being resolved prior to, or during, the Examination.
- 2.1.2 The tables include a High, Medium and Low rating to highlight the likelihood of each issue being resolved. The following consideration has been applied:
- **High** – issues that are likely to be resolved prior to or during Examination.
 - **Medium** – issues which are in discussion and may be resolved during Examination.
 - **Low** – fundamental disagreements which are unlikely to be resolved during Examination.

Table 1: Bedford Borough Council (BBC) Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
BBC - 01	BBC raised concerns regarding the siting of the BESS within Flood Zone 3 and locality of the BESS adjacent to an Upper Nene Valley Gravel Pits. Further concern was raised in relation to public health and environmental impacts from a potential BESS fire, particularly in relation to nearby urban settlements.	Bedford Borough Council	ES Chapter 9: Ecology and Biodiversity [EN010170/APP/GH6.2.9] ES Chapter 10: Hydrology, Flood Risk and Drainage [EN010170/APP/GH6.2.10] ES Chapter 22: Ground Conditions and Contamination [EN010170/APP/GH6.2.22]	Medium



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
			ES Chapter 23: Major Accidents and Disasters [EN010170/APP/GH6.2.23] Battery Storage Safety Management Plan [EN010170/APP/GH7.7]	
BBC – 02	<p>BBC raised a concern about the clarity of the developer's waste strategy, particularly regarding battery and PV panel replacement during the operational phase.</p> <p>BBC consider a significant concern is how a Condition, s106 and/or other agreement can be agreed between Parties to ensure that such plans/regulations (Proposer - Site Waste Management Plan, Waste from Electrical and Electronic Equipment Regulations, Operational Environmental Management Plan, Decommissioning Resource Management Plan, et al) are monitored, regulated, and enforceable by a Local Planning Authority and/or that a Local Planning Authority has the resources and expertise inhouse to monitor any such management plans. It is suggested that the Promotor reverts on this matter.</p>	Bedford Borough Council	<p>ES Chapter 24: Other Environmental Matters [EN010170/APP/GH6.2.24]</p> <p>Outline Construction Environmental Management Plan [EN010170/APP/GH7.1]</p> <p>Outline Operational Environmental Management Plan [EN010170/APP/GH7.2]</p> <p>Outline Decommissioning Statement [EN010170/APP/GH7.3]</p>	High



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
BBC - 03	BBC raised a concern about the potential loss of visual amenity and public enjoyment along PRow routes, and the need for landscape and hedgerow management.	Bedford Borough Council	ES Chapter 8: Landscape and Visual Impact [EN010170/APP/GH6.2.8] Outline Public Rights of Way and Permissive Paths Management Plan [EN010170/APP/GH7.10]	Medium

Table 2: North Northamptonshire Council (NNC) Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
NNC-01	NNC suggest that significantly more information will be needed on the distribution of bats within the search area, and the potential impacts of the change of use of the land as much as impacts on identified roost/hibernation sites.	North Northamptonshire Council	ES Chapter 9: Ecology and Biodiversity [EN010170/APP/GH6.2.9]	Medium
NNC-02	NNC note that the impact of the proposals on Functionally Linked Land around the SPA needs more information, as identified in the PEA and appendices. Where necessary, the proposals should be adapted to enhance the potential of parcels of land for new wetland habitats and foraging for birds of interest.	North Northamptonshire Council Natural England	ES Chapter 9: Ecology and Biodiversity [EN010170/APP/GH6.2.9]	Medium



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
NNC-03	<p>NNC suggest that the current lack of information on Biodiversity Net Gain (BNG) means it is unclear whether the development will be able to, or intended to, meet the minimum 10% uplift within each of the identified sites, or whether this will be achieved across the whole development area.</p> <p>It is the view of NNC ecological officer that the BNG uplift should be achieved within each development parcel. Any impacts and BNG required due to the impacts from the cabling route should be delivered within the area of the cable route itself, or within the closest area for the placement of the solar array.</p>	North Northamptonshire Council	<p>ES Chapter 9: Ecology and Biodiversity [EN010170/APP/GH6.2.9]</p> <p>Biodiversity Net Gain Assessment [EN010170/APP/GH6.3.9.13]</p>	Medium
NNC-03	<p>NNC's Archaeology Officer has emphasised that evaluation must include areas which appear blank on the geophysics, as geophysics has limitations and should be used as part of a suite of techniques which complement each other. While other options apart from trenching have also been mentioned in discussions, there has been less commitment so far to carry out evaluation outside areas where the geophysics has detected archaeology. NNC considers that this must be addressed, and it is not acceptable to push the majority of evaluation to a post-</p>	North Northamptonshire Council	<p>ES Chapter 12: Cultural Heritage [EN010170/APP/GH6.2.12]</p> <p>ES Appendix 12.6: Archaeological Mitigation Strategy [EN010170/APP/GH6.3.12.6]</p>	High



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
	consent phase. A proper assessment of the risks of development is crucial.			
NNC-04	NNC Archaeology Officer has mentioned to the Applicants' representatives that there are other methods of surface mounting and given the scale of the areas that may need such treatment, methods such as four-pin piling may be preferable. Large areas of concrete feet often need some levelling of the ground surface, and this carries with it another potential detrimental impact to the archaeological levels.	North Northamptonshire Council	ES Chapter 12: Cultural Heritage [EN010170/APP/GH6.2.12] ES Appendix 12.6: Archaeological Mitigation Strategy [EN010170/APP/GH6.3.12.6]	Medium
NNC-05	NNC consider that a revised scheme design and exclusion of development from areas of BMV agricultural land (Grade 2 at the very least) will minimise negative impacts on soil resources. When finalising layouts, Applicants should seek to minimise impacts on the BMV agricultural land and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations.	North Northamptonshire Council	ES Chapter 20: Agricultural Circumstances [EN010170/APP/GH6.2.20] Farming report [EN010170/APP/GH7.27] Outline Soil management plan [EN010170/APP/GH7.6]	Medium
NNC-06	NNC consider that the scheme needs a substantial financial mitigation package, to address the physical and environmental impacts and harms associated with the development and to support opportunities to address achieving carbon neutrality. Any associated legal	North Northamptonshire Council	Environmental Statement [EN010170/APP/GH6.1 to 6.5]	High



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
	agreement to secure community benefits will also need to address how the scheme will be decommissioned at the end of the Scheme lifetime, e.g. bonds, sinking funds etc to secure remediation.		Draft Development Consent Order [EN010170/APP/GH3.1]	

Table 3: West Northamptonshire Council (WNC) Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
WNC-01	<p>The siting of suitable access arrangements for each of the individual sites should be based on:</p> <p>i. Road safety considerations (e.g. provision of suitable visibility splays, vehicle flows and speeds, vehicle swept path analysis and road geometry). It should also be noted that a design approach to minimise / consolidate the number of site access points would be supported in order to reduce the potential number of conflict points.</p> <p>ii. Operational considerations (e.g. construction and operational periods, type of vehicles,</p>	<p>West Northamptonshire</p> <p>North Northamptonshire</p> <p>Milton Keynes</p> <p>Members of the public</p>	<p>Transport Assessment [EN010170/APP/GH6.3.13.2]</p>	High



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
	<p>frequency, service / delivery routes, avoidance of sensitive areas).</p> <ul style="list-style-type: none">• Further to the above road safety consideration, where appropriate Stage 1 Road Safety Audits may be required in order to support scheme proposals.• Fully scaled and annotated site access / layout plans would need to be provided for each of the respective site. The plans would need to clearly indicate both the red line and public highway boundaries.• On safety grounds, a site access vehicle visibility plan for each site should be provided demonstrating that visibility splays based on current design standards and 85th percentile surveyed vehicle speeds can be accommodated fully within the public highway boundary or within land that is under the applicant's control (in accordance with the requirements set out within Manual for Streets / DMRB). The required visibility splays at the site access should also be free from obstructions, from 2m high down to 0.6m above the carriageway. This would apply for both the construction and operational periods.• It is noted that the location of the site access/s has not been determined at this stage. It should			



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
	be demonstrated that the vehicle route / access to and from the site can be suitably accommodated (in relation to construction as well as operational and maintenance vehicles). This may also require vehicle swept path analysis.			
WNC-02	<p>The noise modelling completed suggests that levels of noise at night in some locations will be +4dB above background. This will be a perceptible difference and is a concern given it is nighttime. West Northamptonshire would recommend conditions on:</p> <ul style="list-style-type: none">• Site working hours including construction.• Construction Management Plan (CMP) to include noise, dust and mud control.• No burning during site preparation, demolition or construction works.• Noise assessment and reduction.	West Northamptonshire	ES Chapter 14: Noise and Vibration [EN010170/APP/GH6.2.14]	High



Table 4: Milton Keynes (MK) Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
MK-01	<p>MK raised concern regarding two field parcels of site G which impinge on land identified as locally attractive landscape Ouse Valley Special Landscape Area in the local plan evidence base document - Milton Keynes Review of Local Landscape Designations. MK commented that has not been taken into consideration in the Constraints Plan shown on page 15 of the document 'Green Hill Solar Farm – Co:design workshops, May 2024' and should be. The GF9 and GF13 field parcels east of Lavendon bridleway BW 15 are located in identified locally attractive landscape. MK recommended that these fields should be removed from the proposal.</p> <p>In addition to removing parcels GF9 and GF13 from solar development, this 15m buffer should be applied along the Lavendon bridleway BW 15 providing sufficient offset from the SLA and should be bolstered by hedgerow planting for visual mitigation between the bridlepath and solar development to protect the attractive landscape of the Ouse Valley SLA.</p>	Milton Keynes	<p>ES Chapter 8: Landscape and Visual Impact [EN010170/APP/GH6.2.8]</p> <p>Outline Landscape and Ecological Management Plan [EN010170/APP/GH7.4]</p>	High
MK-02	<p>MK commented that given the nature and scale of the proposed development it would be expected that periodic monitoring of bat activity would occur during the operational phase in order to confirm no significant impacts have occurred as predicted or to</p>	Milton Keynes	<p>ES Chapter 9: Ecology and Biodiversity [EN010170/APP/GH6.2.9]</p>	Medium



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
	inform any remediation measures which need to be implemented should adverse impacts be recorded.			

Table 5: Environment Agency (EA) Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
EA-01	Ongoing consultation is being undertaken with the Environment Agency and Lead Local Flood Authority to agree appropriate principles and controls, which will be secured through the DCO, protective provisions and associated environmental management plans.	Environment Agency	Document Reference: GH3.1 draft Development Consent Order [EN010170/APP/GH3.1]	High

Table 6: Historic England (HE) Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
HE-01	HE commented recommendation for further archaeological evaluation is undertaken prior to the submission of the full ES and with enough detail to inform the DCO application, particularly in areas where there is a high archaeological potential.	Historic England	ES Chapter 12: Cultural Heritage [EN010170/APP/GH6.2.12]	Medium



Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
			Archaeological Mitigation Strategy [EN010170/APP/GH6.3.12.6]	

Table 7: Natural England (NE) Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
NE-01	NE commented that while they concur with the methodology of the aforementioned surveys, NE commented that advice to date has been that where a full suite (i.e. at least 2 years) of wintering bird surveys are not possible/feasible, a precautionary approach will need to be taken, which may require the delivery of mitigation for the loss of FLL. Therefore, NE advise that we do not agree with the statement that 'one year of survey information would be sufficient to inform an assessment of potential impacts upon the SPA'. Further information is needed before a HRA conclusions can be agreed.	Natural England	ES Chapter 9: Ecology and Biodiversity [EN010170/APP/GH6.2.9] Appendix 9.9: Wintering Bird Surveys [EN010170/APP/GH6.3.9.8] Habitat Regulations Assessment [EN010170/APP/GH7.21]	Medium



Table 8: Anglian Water Potential Main Issues

Ref	Description of Issue	Affected stakeholder(s)	Signposting (to application evidence)	Likelihood of the issue being resolved during the Examination
AW1	<p>Anglian Water have raised the following points for engagement:</p> <ol style="list-style-type: none">1.Impact of development on Anglian Water’s assets and the need for mitigation2.The design of the project to minimise interaction with Anglian Water assets/critical infrastructure and specifically to avoid the need for diversions which have associated carbon costs.3.Requirement for potable and raw water supplies4.Confirmation that no connections to be the public sewerage network is required and the removal of any provision in the draft DCO Order which would enable such connections.5.Confirmation of the project’s cumulative impacts (if any) with Anglian Water projects6.Draft Protective Provisions	Anglian Water	<p>GH7.19 Water Resources Assessment</p> <p>[EN010170/APP/GH7.19]</p>	High



2.2 Summary

- 2.2.1 This document sets out the potential main issues for examination. It is anticipated that a number of the issues outlined in this document may be resolved between the submission of the DCO Application and Examination, including once stakeholders have had an opportunity to review the DCO Application and through the evolution of application documents, including the negotiation of 'protective provisions', where necessary. It is the Applicant's intention to continue to work with stakeholders throughout the DCO Examination to resolve issues wherever possible.
- 2.2.2 The Applicant envisages that these issues can be resolved during the Examination, including through the process of producing Statements of Common Ground. The information provided within the application will inform this process and progress the discussion with the stakeholders beyond what is possible at the time of submission.