

Green Hill Solar Farm

EN010170

Environmental Statement

Appendix 9.4: Consultation Responses

Prepared by: Clarkson & Woods Ltd.

Date: May 2025

Document Reference: APP/GH6.3.9.4

APFP Regulation 5(2)(a)



Appendix 9.4 – Consultation Responses

- 1.1.1 This appendix provides responses and excerpts of responses from consultees relevant to Chapter 9: Ecology and Biodiversity, which have then been used to guide Scheme design, impact assessment and formulation of any necessary mitigation and enhancements.
- 1.1.2 Responses received at the scoping and statutory consultation phases are not set out here, as they are detailed in Tables 1 and 2 of the main ES Chapter; Chapter 9: Ecology and Biodiversity [EN010170/APP/GH6.2.9]. As such, the responses in this appendix relate only to consultation undertaken outside of the formal scoping and statutory consultation phases.
- 1.1.3 The table below summarises each form of correspondence and a reference number is given to aid location within this appendix.

Table 1: Summary of Consultation Responses

Item Reference	Consultee, Enquiry and Dates
Natural England	
1	Natural England Discretionary Advice Service (DAS) Applicant ecologist contacted NE to hold initial meeting and confirm the scope of wintering bird surveys required. It was confirmed that nocturnal surveys would be required. Virtual meeting held 16/01/2024. Email response received 16/01/2024.
2	Natural England Discretionary Advice Service (DAS) Applicant ecologist contacted NE to confirm the scope of ecological survey work required. Applicant ecologist responded with follow up questions and clarifications. Email response received 01/02/2024. Follow-up email sent 16/02/2024.
3	Natural England Discretionary Advice Service (DAS) Applicant ecologist contacted NE to confirm the scope of wintering bird surveys required. It was confirmed at that time that only 1 year of survey effort would be required. Email response received 18/03/2024.
4	Natural England Discretionary Advice Service (DAS) NE advised that recent discussions with LPAs meant that 2 years of wintering bird survey effort would be required. Email response received 20/08/2024.
5	Natural England Discretionary Advice Service (DAS) Applicant ecologist contacted NE to hold meeting re. revised scope of wintering bird surveys and mitigation. NE provided advice re. mitigation for Functionally Linked Land in follow-up email. Applicant ecologist responded requesting further clarity over likely quantum of mitigation land needed. Virtual meeting held 05/09/2024. Email received 05/09/2024.



Item Reference	Consultee, Enquiry and Dates
6	<p>Natural England Discretionary Advice Service (DAS)</p> <p>Applicant ecologist contacted NE to discuss the suitability of an offering of precautionary mitigation provision for Functionally Linked Land (given that 2 years' survey could not be completed across all Sites).</p> <p>NE requested further information, which was provided by the applicant ecologist. The utility of supporting BTO data was queried.</p> <p>NE provided a response, but did not clarify the extent of land which may be needed as precautionary mitigation.</p> <p>Initial email sent 09/10/2024.</p> <p>Final response received 17/12/2024.</p>
7	<p>Natural England Discretionary Advice Service (DAS)</p> <p>Applicant ecologist contacted NE to discuss their position around Biodiversity Net Gain.</p> <p>Email response received 13/02/2025.</p>
8	<p>Natural England Discretionary Advice Service (DAS)</p> <p>Applicant ecologist responded to NE's incorrect statement that only 1 year of survey effort would be completed and sought to clarify the outstanding matter of precautionary mitigation land. Applicant ecologist reclarified survey effort. NE did not clarify their position but stated their preference to view full survey data before making a decision.</p> <p>Initial email sent 13/02/2025.</p> <p>Final response received 11/03/2025.</p>
Meetings with LPA Ecologists	
9	<p>North Northamptonshire Local Planning Authority</p> <p>Applicant's Ecologist and Planning Agent contacted North Northamptonshire Local Planning Authority to discuss the Scheme and gauge initial thoughts.</p> <p>Virtual meeting held 29/02/2024.</p> <p>Summary of meeting minutes presented.</p>
10	<p>Local Planning Authority Ecologists</p> <p>Applicant ecologist contacted the various LPA Ecologists to arrange a meeting to discuss the Scheme and address scoping responses.</p> <p>Virtual meeting held 19/12/2024.</p> <p>Email summary issued by applicant ecologist 07/01/2025.</p>



Item 1

From: [REDACTED]

Sent: Tuesday, January 16, 2024 3:37 PM

To: [REDACTED]

Cc: [REDACTED]

Sub: [REDACTED]

Dear all,

A pleasure meeting you in our introductory meeting this afternoon. As promised, please find attached the information in relation to wintering bird surveys and nocturnal counts - for FLL proposals and those which affect Golden Plover and Lapwing populations, we would expect Nocturnal surveys to be carried out as part of the wintering bird surveys; the attached methodology will be of assistance.

I look forward to hearing from you with further questions in due course.

Best,

[REDACTED]



Item 2

See overleaf.

Mike Hockey

Subject: FW: DAS Consultation - FAO Nima - w/c 11 March

From: [REDACTED]
Sent: Friday, February 16, 2024 11:36 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: DAS Consultation - FAO Nima

Hi [REDACTED]

Many thanks for quickly getting back to us last month. This initial feedback is useful, although we have found some elements to be ambiguous and further clarification would be useful. This is particularly the case around the scopes of survey work that were proposed for the solar sites and cable routes. This element was a priority for receiving clear advice from Natural England through the DAS process, given the potential timing and cost implications on the project that may occur if we are not clear on Natural England's expectations. Given the extensive background/contextual information we provided in our advice request document, we are therefore seeking some additional clarity on Natural England's position on these elements and our additional queries below.

We are keen for any feedback on these specific queries by email as soon as you are able, but meeting in person has its advantages so would also like to arrange to meet again soon via Teams. Might this also be an opportunity to connect with the NSIP assigned colleagues you mentioned, should they also have additional comments or has their response already been included within your initial response?

When would you next be available to meet – do you have any capacity before 07 March 2024? We have availability Weds 28 Feb pm (preferred) and Weds 06 March all day.

Our queries are set out below ([included in blue text](#)) along with our initial questions reattached for ease:

1. The methodology for protected species surveys is as we would expect to see and would strongly recommend surveys therefore need to be done to the same standard and using the same methodologies.*
[Our understanding is therefore that the proposed methodologies included within our initial correspondence \(attached for reference\) are considered wholly acceptable by Natural England. This includes the proposed wintering bird survey \(nocturnal and diurnal\) methodologies, as well as proposed survey effort. Is that correct?](#)
2. In light of the fact extensive wintering bird surveys are being completed, Natural England would be satisfied that WeBS data would be unnecessary due to the high level of information to be included in the report, subject to its review.
[Thank you for confirming; no WeBS data will be requested to support the application.](#)

[For interest, where are the BTO counts taken from \(attached as an Excel in your second email\)? Are these WeBS BTO data counts or from another data source?](#)

3. Natural England would require a review of all survey work undertaken in order to make an adequate assessment (and identify any potential impacts) including all WBS surveys.

Yes, we agree that this is important. If WBS information is shared on an interim basis in subsequent correspondence/meetings, will this be considered before the completion of all WBS surveys? In particular, to inform and ensure that the proposed WBS nocturnal bird survey effort remains sufficient?

We are keen to foster continued dialogue with Natural England, so that we can make the most of the DAS process, as well as being in the best position to inform the proposed scheme.

4. Natural England considers the data obtained from passive acoustic detectors would be acceptable as a supplementary source of information to that collated through manned nocturnal surveys.

Thank you for confirming.

5. Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species, available here: [Protected species and development: advice for local planning authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/protected-species-and-development-advice-for-local-planning-authorities). Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

To clarify, is this to mean that Natural England will only provide bespoke protected species advice as part of this DAS consultation where such species are associated with a SSSI or in exceptional circumstances, or has this been included as a broad statement on Natural England's overall approach to protected species work?

We understood that NE would ordinarily provide comments on any given protected species, regardless of their association with an SPA or SSSI, wherever appropriate/needed.

The Upper Nene Valley Gravel Pits SPA is the driver for our consultation, but we acknowledge the wintering and breeding bird assemblages also recognised under its national designation as a SSSI.

6. Generally speaking Natural England would be satisfied with cable routes being covered by the same survey standard although further information would be required in relation to trenching and its locations, and full Construction Environmental Management Plans (CEMP) would be required.*

For clarity, what is meant by the 'same survey standard'? Within our written response, the proposed survey methodology for cable routes is refined from the more extensive solar site survey scope to be (what we consider) proportionate, taking into account the temporary and low-impact nature of the proposed cable route works. Can we assume that 'the same survey standard' is stating that NE consider the revised proposed survey methodologies and scope (as detailed within the 'Cable Route Installation' section) to be acceptable? In particular, with regards to the proposed scope for wintering (diurnal and nocturnal) and breeding bird surveys.

We are unclear if this response is confirming that the proposed scope for cable survey routes is considered to be sufficient, as it does not appear to acknowledge the differences between those areas proposed for development and the cable route, where works will be temporary.

What information is required with regards to trenching? At present, the precise location is not defined, however we are consulting with our client to ensure the best location, in terms of avoiding constraints.

** Natural England's Wildlife Licensing Team should be consulted at the earliest opportunity to agree the full scope of surveys to be undertaken. Where a plan or project is not directly*

connected with, or necessary to site management for nature conservation purposes, and is likely to have a significant effect on the features of interest of the site, an Appropriate Assessment of the impacts of those proposals is required.

We are slightly confused by this addendum, as it is our understanding that Natural England's DAS enables consultation with all relevant bodies, including the Wildlife Licensing Team should they have specific comment. Is that so? It was mentioned that other NE employees would be consulted as part of this DAS consultation, such as those with the NSIP team – does this also extend to include the NE Wildlife Licensing Team?

Lastly, some generic recommendations, taken from the Upper Nene Valley Gravel Pits SPA, have been copied below. These include reference to WeBs surveys, however within the document itself, this element appears to relate to developments proposed within the SPA boundary. As Q2 above shares that the proposed extensive bird surveys supersede the need for WeBS data, we have assumed this also extends to mean that WeBs surveys at adjacent gravel pits are not expected either; however if there is something in particular within this copied paragraph of text that has led to its inclusion, we would be grateful if it could be made explicitly clear.

As above, we understand that the proposed breeding bird surveys are extensive and proportionate, but if the generic section regarding breeding birds has been included for a particular reason, please can this be shared in detail.

Many thanks in advance and look forward to hearing from you (and meeting again) soon.

With thanks,

[Redacted]

[Redacted] s BSc (Hons) ACIEEM

Senior Ecologist
Clarkson & Woods Ltd.

T: [Redacted]

M: [Redacted]

W: [Redacted]

From: [REDACTED]
Sent: Thursday, February 1, 2024 4:18 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: DAS Consultation - FAO Nima

Hi [REDACTED]

Many thanks for providing the attached information regarding surveys. Further to your queries relating to protected species surveys I can confirm from the supplied information to hand at present:

1. The methodology for protected species surveys is as we would expect to see and would strongly recommend surveys therefore need to be done to the same standard and using the same methodologies.*
2. In light of the fact extensive wintering bird surveys are being completed, Natural England would be satisfied that WeBS data would be unnecessary due to the high level of information to be included in the report, subject to its review.
3. Natural England would require a review of all survey work undertaken in order to make an adequate assessment (and identify any potential impacts) including all WBS surveys.
4. Natural England considers the data obtained from passive acoustic detectors would be acceptable as a supplementary source of information to that collated through manned nocturnal surveys.
5. Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species, available here: [Protected species and development: advice for local planning authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/protected-species-and-development-advice-for-local-planning-authorities). Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

6. Generally speaking Natural England would be satisfied with cable routes being covered by the same survey standard although further information would be required in relation to trenching and its locations, and full Construction Environmental Management Plans (CEMP) would be required.*

I trust the above information is suitable confirmation but please feel free to ask should you have any further queries.

Best,



** Natural England's Wildlife Licensing Team should be consulted at the earliest opportunity to agree the full scope of surveys to be undertaken. Where a plan or project is not directly connected with, or necessary to site management for nature conservation purposes, and is likely to have a significant effect on the features of interest of the site, an Appropriate Assessment of the impacts of those proposals is required.*

This will, as previously pointed out, apply to:

- *Proposals entirely new to the SPA and occurring within the SPA boundary*
- *Proposals involving existing activities occurring elsewhere in the SPA, but new to the specific location within the SPA boundary*
- *Variation of an activity currently occurring at a specific location e.g. increased intensity/duration*
- *Proposals outside the SPA that may impact on the site, e.g. housing development, wind farm*
- *Proposals within the SPA that are not connected with nature conservation management and do not require planning consent but are listed within the SSSI notification package as an Operation Requiring the Consent of Natural England.*

These include desk study, scoping and Phase I surveys. An extended Phase I ecological survey should be carried out to provide a high level assessment of the ecological interest of the area and its surroundings. (Joint Nature Conservation Committee. 2010. Handbook for Phase 1 Habitat Survey – a technique for environmental audit. Peterborough: Joint Nature Conservation Committee. Available at <http://jncc.defra.gov.uk/page-2468>)

- *Undertake a desk study to identify all relevant statutory and non-statutory nature conservation sites and features of ecological significance that may be affected by the project proposal.*
- *Undertake a habitat survey of the site in accordance with JNCC Phase I Habitat Survey methodology.*

- *Identify the presence of protected species and species/habitats of conservation importance, within the site and surrounding it, and provide recommendations for further survey work.*

Guidance on Wintering birds

More than 20,000 migratory waterbirds use the Upper Nene Valley Gravel Pits SPA during the non-breeding period. Population surveys are required to determine the numbers, distribution and behaviour (feeding, roosting) of birds within the part of the site that could be affected by the plan or proposal. Although some Wetland Bird Survey (WeBS) data are available for the Upper Nene Valley Gravel Pits SPA not all pits are counted regularly. Wintering bird surveys are still required to supplement WeBS data and should use the methodology below:

- *Counts should use the standard Wetland Bird Survey methodology and be undertaken at two- to three weekly intervals throughout the defined survey period. Surveys should be at least 10 days and no more than 21 days apart. (British Trust for Ornithology. Date unknown. WeBS: Core Counts Methods [ONLINE]. <http://www.bto.org/volunteersurveys/webs/taking-part/core-counts-methods>.)*
- *Counts should be recorded on a pit-by-pit basis to allow comparison with existing data. Standard count units, corresponding to WeBS sectors, will be supplied by Natural England.*
- *Counts should be undertaken from the beginning of September to the end of March, and a minimum of one winter's counts will be required. Counts may be undertaken over the course of one winter period, e.g. September 2009 – March 2010 (preferred option), or over one calendar year, e.g. January – March 2010 and September – December 2010.*
- *Additional August counts may be required in areas where there are known to be significant post-breeding flocks of species like gadwall, great-crested grebe and shoveler. This will be advised in advance on a case by case basis.*
- *Brief details of any recreational disturbance incidents should be recorded, including date, location, type of disturbance and response of birds to the disturbance, in accordance with WeBS methodology.*

Guidance on Breeding birds

The Upper Nene Valley Gravel Pits SSSI supports more than 27 species defined as breeding birds of open water and marginal wetland vegetation. Many other species of high conservation concern also occur. Surveys are required to estimate breeding bird numbers and distribution.

- *A general breeding bird survey using a modified version of the Common Bird Census methodology should be undertaken. This should consist of not less than four visits during the period April to July (one visit per month, ideally on or around the middle of the month). Available at: British Trust for Ornithology. 2009. Common Birds Census [ONLINE]. <http://www.bto.org/survey/complete/cbc.html>*
- *Surveys should be carried out in good weather, between dawn and 1100 hours or (where necessary) in the three hours prior to dusk.*
- *Applicants are encouraged to record all bird species. However, special attention should be paid to recording the numbers, distribution and breeding status (Refer to British Trust for Ornithology. Date unknown.*

Breeding Status Codes [ONLINE].

<http://www.bto.org/sites/default/files/u36/downloads/breedingcodes.pdf> of those waterbird species included in the Guidelines for Selection for Biological SSSIs and which form the basis for the nationally important breeding bird assemblage found in the Upper Nene Valley Gravel Pits SSSI.

- *In addition to these species, similar details should be recorded for turtle dove, oystercatcher, lapwing, sand martin, little egret and cormorant, where these are present. See Gilbert et al. (1998) for further information on methodologies.*
- *Additional species/group surveys, e.g. dabbling and diving ducks, and waders, may also be required.*
- *Brief details of any recreational disturbance incidents should be recorded, including date, location, type of disturbance and response of birds to the disturbance, in accordance with WeBS methodology.*



Item 3

RE: DAS Consultation - FAO Nima - w/c 11 March



[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [📎](#) [⋮](#)

Mon 18/03/2024 15:36

[i](#) Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Hi 

Many thanks for getting back to me on this in Heather's absence; please note that there will not be a need for 2 year's surveys as per our discussions, a single year will suffice, as agreed, in line with a surveying effort which covers the following:

- Diurnal wintering bird surveys – full suite of surveys completed between Oct – Feb 23/24, with the exception of one land parcel to be subject to further monthly survey in Oct and Nov 2024 (due to the late addition of this parcel/surveys not starting until Dec 2023);
- Nocturnal wintering bird surveys – three nocturnal surveys carried out between early Feb (proxy for late Jan), late Feb and due mid-March 2024, but excluding one land parcel (Parcel A) that lies beyond 10km/the consultation zone, as defined within associated SPD docs (see below);
- Diurnal breeding bird surveys – full suite surveys to be carried out between mid-March and July 2024.

In terms of availability after Easter, I have availability on the afternoon of Monday April 8th and also Wednesday April 10th if either of those dates work for yourselves?

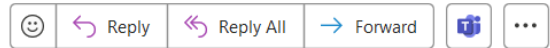
Best,





Item 4

RE: Green Hill Solar DAS Consultation Meeting - 10/04/2024



Tue 20/08/2024 09:11



Follow up completed on 20 August 2024

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Hi



Hope this finds you well! Having now heard back from our counterparts in Buckinghamshire I think it would be a good idea to touch bases and see where we are in terms of requirements and present survey efforts. Do let me know your suitability for this.

We have also, since we last spoke, been part of a joint effort with the Wildlife Trust, and indeed the local authority, in relation to functionally linked land and our requirements for a site (or series of sites) like this. What that looks like for the total area of sites currently forming part of the proposal is 2 seasons of wintering bird surveys or a prescribed area of mitigation without the need for further survey efforts. We can discuss on the call just what mitigation might look like for this particular proposal.

Please do not hesitate to get in touch about this and as stated, I would be happy to arrange a meeting to clarify any of these points.

Best,





Item 5

See overleaf.

Mike Hockey

Subject:

FW: Green Hill Solar DAS Consultation Meeting - 10/04/2024

From: Chris Poole [REDACTED]

Sent: 24 September 2024 15:48

To: [REDACTED]

Subject: RE: Green Hill Solar DAS Consultation Meeting - 10/04/2024

Hi Nima,

Thanks for sending over the below information. We are still in discussions with our client as to the route we will be taking forward on this, but I was hoping to gauge whether another meeting would be productive at this stage, and to establish how you would see the discussion of potential mitigation land requirements playing out. Although I appreciate that we are still at an early stage in the development of the new guidance, a better steer on the likely land take for mitigation, based on the survey data that we currently hold, would be very much appreciated as we progress through the design phase of the Scheme and approach the winter survey season.

If we were to have a meeting, it would be helpful if we could meet both with you and your colleague who will be involved in discussions surrounding the mitigation land requirements. We would intend to present you both with the full results of our surveys completed to date, as well as present a few potential areas within the Scheme which have been removed from the development area due to various constraints, which may be suitable for bird mitigation (covering both ground nesting birds and golden plovers, as discussed in our previous meeting). All of the golden plover and lapwing data we have recorded on site to date has now been digitised and mapped, so I can send over these survey maps ahead of our meeting for your review.

What we really need at this stage is a better indication of how the mitigation requirements will be calculated/assessed, and, based on our survey results to date, how much mitigation land for golden plovers may be required for this scheme. Would you and your team be in a position to give any further guidance on this at this stage, or would it be a better use of time to defer a meeting until you have made more progress on the guidance and how mitigation land will be assessed?

If you feel a meeting would be productive, do you and your colleague have any availability weeks commencing Monday 7th or 14th October to discuss the above?

Many thanks,

[REDACTED]

[REDACTED]



**CLARKSON
& WOODS**
ECOLOGICAL CONSULTANTS



Overbrook Business Centre
Poolbridge Road, Blackford
Somerset, BS28 4PA

From: [REDACTED]
Sent: 05 September 2024 15:42
To: [REDACTED]
Cc: [REDACTED]
<[REDACTED]>
Subject: RE: Green Hill Solar DAS Consultation Meeting - 10/04/2024

Dear all,

Many thanks for attending this morning's meeting. Further to our discussion please find attached the following information which will be useful if the avenue of mitigation is to be explored:

We believe that suitable mitigation could be delivered relatively easily through a scheme of replacement habitat provision, or by bringing an area of nearby land into favourable management for the SPA birds. Mitigation should be secured through an appropriate in-perpetuity land management agreement. Broad criteria for the provision of suitable replacement habitat include:

- *An appropriate extent of open habitat created or enhanced for Golden Plover and Lapwing.*
- *'Like for like' replacement habitat as a minimum, i.e. land should be of a similar extent and quality (or better) to that which is lost to development.*
- *Golden Plover favour open landscapes that are not too enclosed - smaller sites that are bounded by dense hedgerows, woodlands and tall trees should therefore be avoided.*
- *Mitigation should be as close to the existing site as possible, but free from any development disturbance. When selecting a mitigation site, you will need to be mindful of any disturbance that could discourage its use – e.g. proximity to roads and built-up areas, impacts on sightlines, degree of public access, bright lights and noise disturbance etc.;*
- *Habitat should be managed to a high specification, ensuring its suitability for Golden Plover and Lapwing (e.g. providing scrapes or waterlogged areas for lapwing, maintaining good quality invertebrate-rich soils for the birds, and ensuring good visibility and sightlines are maintained);*
- *Managed and secured in-perpetuity (at least 80 years).*

Golden Plover are unlikely to use fields that are too small, regardless of the land use type / habitat quality. They will rarely use fields of 10 Ha or less and prefer fields of 15 – 30 Ha or bigger. For larger developments, we would look for a minimum area of 20 Ha of mitigation habitat to be secured, noting the 'like for like' point above. There can be a degree of balance between the quality and quantity of the land – for example, enhancing a 20-hectare site that the birds already use would be of greater benefit than a 30-hectare site close to disturbance (buildings, roads etc). The suitability of mitigation proposals would be judged on case-by-case basis.

With mitigation for smaller sites, you could look at opportunities to connect and enhance field parcels that are already being used by the birds (e.g. using Record Centre data as a starting point to inform a proposal). Based on bird records and their distribution across the landscape – are there any nearby fields where management could be enhanced to support golden plover and lapwing? Again, mitigation proposals would be judged on a case-by-case basis.

Land management that increases the invertebrate biomass will be key in delivering improvements and enhancements for SPA birds – particularly those that encourage larger beetles, craneflies and earthworms. Any management enhancements should be made to the birds preferred habitat (grassland pasture or arable land) and could include:

- *Introduction of no-till farming areas*

- *Creation of beetle banks*
- *Wetting of grassland*
- *Spreading of manure.*

I trust this is of assistance, do let me know once you have spoken with the client and I will be happy to assist going forward.

Best,





Item 6

See overleaf.

Subject:

FW: Green Hill Golden Plover Mitigation

From:

Sent: 17 December 2024 13:18

To:

Subject: RE: Green Hill Golden Plover Mitigation

Dear

Thank you for those details, the proposal for mitigation has now been sent over to our experts who will hopefully be able to respond by the end of the week, if not it will unfortunately be into the start of the new year but I can assure you this is being dealt with as a matter of urgency.

I will be in touch as soon as I hear back from them...

Best,

From:

Sent: 12 December 2024 18:05

To:

Cc:

Subject: RE: Green Hill Golden Plover Mitigation

Importance: High

Hi

Thanks for your response. Your assistance is appreciated and we are glad to hear NE are reviewing our PEIR. Hopefully this provides some useful additional information, although we have already separately provided you with pertinent survey data re. golden plover and lapwing to inform impacts on the SPA.

Desk Study

You have said below that NE suggest obtaining “records covering the prescribed parcels of land”. *To confirm, we have already gathered desk study data within a 2km radius of our sites from local records centres and I provided relevant bird records within the spreadsheet in my last email.*

Further BTO data from WeBS counts do not pertain to the land within our sites. WeBS surveys are undertaken at reservoirs, lakes and the gravel pits of the SPA; the following link shows the survey areas covered: [WeBS Online \(BTO/RSPB/JNCC\)](#)

If NE would still like us to purchase BTO data, then we would need clarification as to which survey parcels data need to be obtained for, and what type of data is required.

Precautionary Mitigation in Lieu of Survey Data

As the design freeze for the Scheme approaches, we need to be in a position where we have agreed a sufficient quantum of land to be set aside for precautionary mitigation in lieu of completing a full two years of surveys across all sites. This addresses your second bullet point in your email below.

To reiterate, the surveys which will be lacking from a full two year-scope at the point of submission are:

- 1 x full year of diurnal bird surveys at Green Hill G
- 2 x diurnal wintering bird surveys at Green Hill F
- 1 x full year of nocturnal bird surveys at all parcels within 10km of the SPA (Green Hill B-G + BESS)

To account for the omission of the above surveys, we have put forward a precautionary mitigation package totalling **20.73ha** of land over two fields in the south of Green Hill E (please see the fields in yellow on the image at the bottom of this email).

We have targeted this location at Green Hill E given the criteria that you sent over for suitable mitigation land: being fields over 10ha each and the total area of mitigation land being over 20ha. These fields are also some of the closest to the SPA within the Scheme which are of a sufficient size for golden plover; so we would consider this a highly favourable location for plover mitigation land. The fields are currently separated by a species-poor hedgerow in moderate condition (according to BNG condition assessment criteria) and so the removal of this intersecting hedgerow to provide a singular area of 20ha could be explored if this is preferred, given golden plovers' preference for fields over 15ha. We would be happy to discuss land management options with Natural England/LPA ecologists once the extent of mitigation land has been agreed.

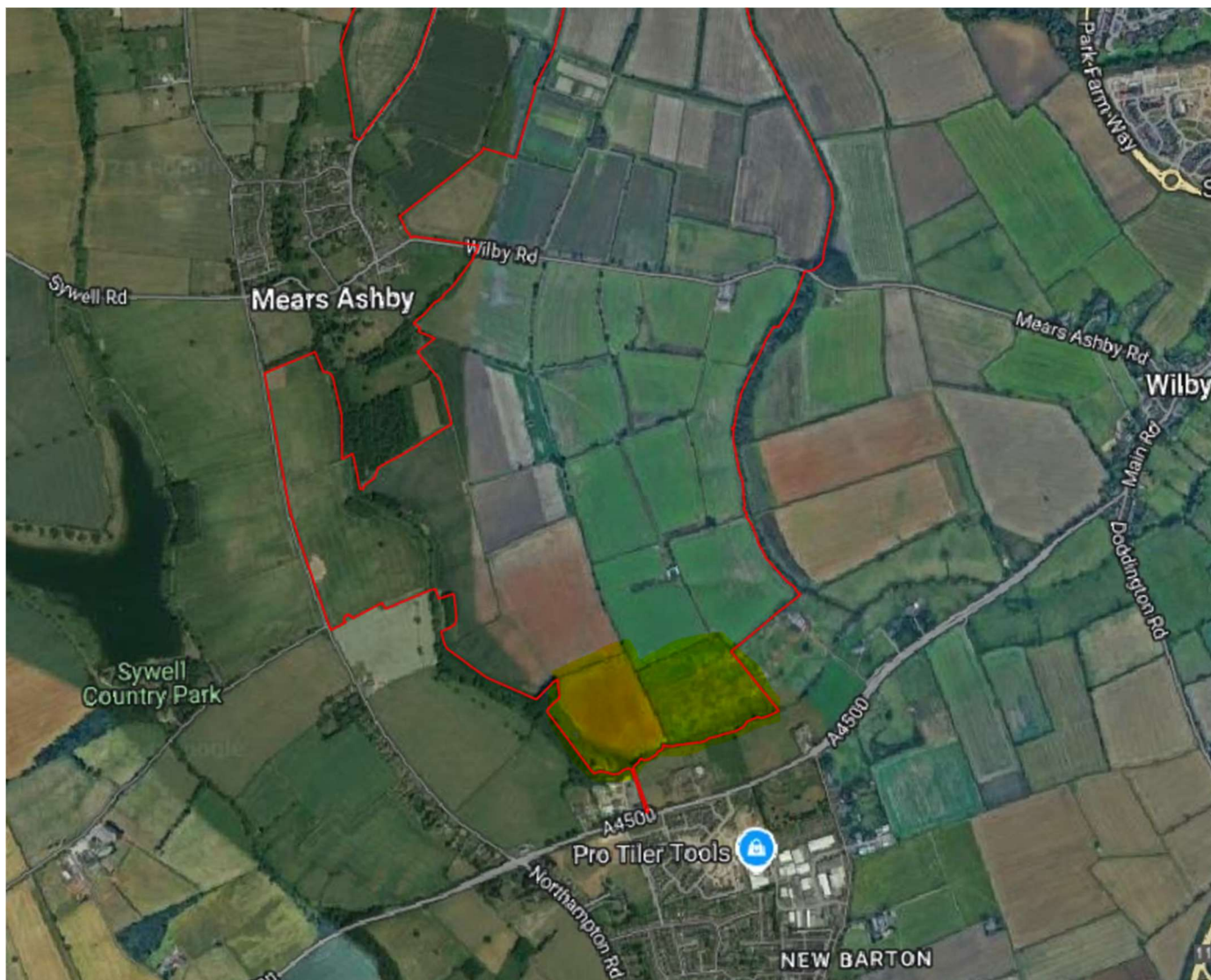
Given the lack of any evidence of Functionally Linked Land across all of the surveys completed to date, we feel that this mitigation package represents a likely worst-case scenario for the missing survey work, and therefore hopefully Natural England can agree on this level of mitigation at this stage. Our remaining survey work this winter will assess the level of Functionally Linked Land across the sites and, if any is recorded during these upcoming surveys, then we will put forward a separate mitigation package for this.

If at all possible, we would very much appreciate a response on these matters before the Christmas break, as our client is anxious to gain clarity/ closure prior to the holiday period.

I look forward to hearing from you.

Kind regards,





From: [REDACTED]
Sent: 04 December 2024 14:10
To: [REDACTED]
Subject: RE: Green Hill Golden Plover Mitigation

Dear [REDACTED]

Many thanks for your email, I would be happy to outline our position thus far and hope this will assist going forward, although in the absence of data, as an evidence-driven process this can only be conjecture on the whole. Furthermore, having now been given the opportunity to do so, NE are currently assessing the data included within the PEIR and welcome the fact an in-depth consideration of the Scheme in combination with other local development, both at the construction and operational phases, is being provided. An NSIP senior is currently reviewing the documents provided and will be feeding back to myself in due course.

Current Position

NE note the current objectives and discussions have been held with GH, summarised below :

- Now having knowledge of the full extent of the parcels of land which will be incorporated in the Green Hill Solar scheme, as well as enhanced guidance on FLL it has been agreed that two year's survey effort would be needed, to be confident re. the extent of FLL.
- Bearing in mind the project timeframes, and the later introduction of some parcels to the Scheme, GH would be unable to provide a full two year's survey effort by the point of submission. As such, NE has suggested that a degree of precautionary provision of mitigation land would be required, taking into account the data from completed surveys.
- The scope of the surveys has been agreed and survey data thus far has not indicated any functional linkage and is ongoing.
- GH have offered potential areas for precautionary mitigation; NE are of the opinion that until full survey data is provided a conclusive position is difficult to establish and have requested additional information, something GH have now provided through DAS and the recent PEIR submission. This is the status quo.

Desk Study

In terms of the requirement of additional BTO data, NE welcome the willingness to provide this to aid discussions. We would suggest obtaining records covering the prescribed parcels of land with consideration of the surrounding arable land which may be suitable habitat for Golden Plover and Lapwing. This would be of utmost importance in building a robust evidence base for how birds use the landscape, allowing proper evaluation of the land to be affected. Records should be obtained from county bird recorder/ Biological Records Centre.

Field Surveys

Thank you for providing the attached spreadsheet containing all surveys completed to date. With regard to the proposed scope of survey work, NE would deem a combination of the prescribed survey data (in accordance to that which we have agreed) alongside BTO data as adequate. To reiterate, NE would be inclined to accept BTO data in combination with the survey efforts of Green Hill A, B, C, D, E and BESS, and our specialist considered the reduced survey effort for the G site is of less concern if the data from the nearby site (F) is utilised and a precautionary approach is taken as to what could be present.

BESS Site Selection

NE appreciate the provision of rationale for the considerations into BESS site allocation and while we understand the selection from a strategic perspective, at present there seems to be no evidence of the assessment of the environmental impact of the BESS directly adjacent to the SPA. This will need to be considered in great detail within an Environmental Statement (ES). Allocation on Green Hill C would be certainly more 'sound' and we are pleased to learn there are ongoing technical studies to determine which Site(s) is/are most appropriate.

Cable Route

Thank you for providing further information on the cabling aspect of the project. We would be satisfied with the prescribed habitat surveys of the PCRC and an assessment of the suitability for wintering birds.

Mitigation

At present NE can only provide a worse-case scenario using the precautionary approach, and what FLL mitigation areas might look like but I would be happy to have a look at the sites proposed for mitigation and feed back in terms of their suitability? I am unable to see any files detailed proposed sites at present?

DAS Budget

Many thanks for submitting the updated NSIP statutory advice request form – this will include input from our NSIP specialist Jess James which will certainly assist in getting this over the line so to speak.

I hope this assists in confirming the FLL data required, I will be happy to review the proposed mitigation if you would like to attach that here...

Best,

From: [REDACTED]
Sent: 02 December 2024 20:46
To: [REDACTED]
Cc: [REDACTED]
Subject: Green Hill Golden Plover Mitigation
Importance: High

Dear [REDACTED]

Thank you for your most recent response (email dated 8th November 2024) to our query re. FLL mitigation. Following this, I wanted to clarify a few matters, as it seems we are gaining little traction in these discussions and we want to ensure, on behalf of our client, that we are progressing in a meaningful manner.

Current Position

For the sake of clarity, I've set out below the context to these discussions and where we currently stand:

- We initially received advice from yourself (email dated 18th March 2024) that one year's survey effort, as per our proposed scope, would be sufficient to inform our assessment with respect to the SPA. We therefore proceeded with surveys on this basis.
- In light of emerging guidance, you subsequently advised us (email dated 20th August 2024) that two year's survey effort would be needed, to be confident re. the extent of FLL.
- Bearing in mind the project timeframes, and the later introduction of some parcels to the Scheme, we would be unable to provide a full two year's survey effort by the point of submission. As such, you suggested that a degree of precautionary provision of mitigation land would be required, taking into account the data from completed surveys.
- On request, we have clearly set out our survey scope and provided findings from all survey work completed to date. Our survey data thus far has not indicated any functional linkage.
- In the context of this data, and being mindful of the advice we have received from you re. suitable habitat for golden plovers, we have then offered potential areas for precautionary mitigation.
- Your latest response does not address the suitability of the land we propose, and you have requested additional information. *I have provided detail under the headings below to address new matters raised.*

Desk Study

We have already gathered extensive data as part of a desk study exercise, which is included within our PEIR. This includes local records of golden plover and other species associated with the SPA/ SSSI. Desk study data may be of limited value in assessing how birds use the landscape, since records are often patchy and are by their nature historical, but we will factor these records into the assessment.

For your information, I've attached a spreadsheet to this email. One of the tabs in this spreadsheet contains desk study records of all species listed as qualifying species or species making up the assemblage of the SPA and/or SSSI.

In terms of purchasing additional BTO data, we would be prepared to do this if it would help aid discussions, but the utility of this data is questioned as, so far as I am aware, it pertains to specific survey blocks within the SPA and not to our sites. The presence of golden plover offsite is not meaningful in determining the presence of FLL (where we need to determine accurate on-site counts and consistent use of fields). Likewise for other species; their presence offsite does not relate to their presence onsite. Especially given the context of two years' survey effort across the sites, including Green Hill BESS, we feel BTO data is superfluous and unlikely to be helpful in informing the design of mitigation.

We fully appreciate that this is a large scheme with the potential to impact FLL associated with the SPA; as such, we are keen to work with you to ensure the best outcomes, whilst working to extant and emerging policy. Within the ES, we will consider the Scheme in combination with other local development, both at the construction and operational phases.

Field Surveys

Our field surveys have been designed to record all bird species; as such we are able to consider impacts on all species which may be associated with the SPA/ SSSI, besides golden plover and lapwing.

Impacts on such species are discussed in our PEIR and will be set out within the ES. However, for clarity, we have also collated a summary of field records of these species for you here (see tab in the attached spreadsheet). As you are aware, different levels of survey effort have been completed across different parcels to date and the attached spreadsheet indicates this. From all surveys completed to date, there are no significant observations of birds associated with the SPA/SSSI using the sites.

For the avoidance of doubt, please can you confirm that our proposed survey scope across all parcels, as per our email below, would be acceptable? You state that: *"We would be inclined to accept BTO data in combination with the survey efforts of Green Hill A, B, C, D, E and BESS, and our specialist considered the reduced survey effort for the G site is of less concern if the data from the nearby site (F) is utilised and a precautionary approach is taken as to what could be present."* Being mindful of our thoughts on the provision of BTO data, above, please can you confirm that our survey scope would be acceptable? We are of course prepared to purchase BTO data if there is utility in doing so.

It is good to understand that the lack of a second season of surveys at Green Hill G is of less importance given its distance from the SPA. We will present our assessment with a precautionary approach.

BESS Site Selection

We have now received additional information relating to the rationale for the choice of the BESS site. Please see this below. Please also refer to the PEIR, Chapter 5: Alternatives and Design Evolution of the PEIR; Section 5.7 on page 82 discusses evolution of the BESS design.

Green Hill BESS is the preferred location for the BESS and the 400kV substation required to connect the Sites to National Grid due to its proximity to the Point of Connection at Grendon Substation. Green Hill BESS is the optimal location to combine the solar generation capacity from the northern Sites (Green Hill A, A.2, B, C, D and E) with the southern Sites (Green Hill F and G) at the proposed 400kV substation before connecting to Grendon Substation. Locating the BESS here makes storing solar energy as efficient as possible from the Sites with the shortest possible cable route to Grendon Substation.

National Grid has confirmed that the Point of Connection will be at the southern end of Grendon Substation, making the cable route from BESS1 and BESS2 more efficient. The location of the BESS compounds within Green Hill BESS has been based on their technical feasibility, environmental impact (visual, heritage and flood risk, for example) and alignment with planning regulations.

The preferred location for the BESS at the time of writing is shown on Figure 3.1 of the PEIR, however the BESS may also be located on Green Hill C. Ongoing technical studies will determine which Site(s) is/are most appropriate for the BESS. Ongoing assessment work will also continue to inform design, as well as the statutory consultation. A defined location for the BESS will be presented in the ES.

Cable Route

The Preferred Cable Route Corridor is being finalised and surveys of this corridor are pending. We intend to complete habitat surveys of the PCRC and an assessment of this land's suitability for wintering birds this winter. Detailed wintering bird surveys of the corridor are not proposed given the temporary nature of any impacts.

Cables will be buried and there is no intention to use overhead cables.

Mitigation

We were hopeful that you would have been able to advise re. the suitability of the sites we have put forward as mitigation land in our last email. However, we appreciate that you have requested some additional contextual information (as discussed above) to inform this. As such, we would be grateful, now that we have provided additional supporting information, if you would be able to advise re. this mitigation land as soon as possible once you have reviewed the supporting information. We are keen to resolve this as early as possible, as per your advice that *"mitigation is highly likely to be required and the potential location for this will be worth considering even at this early stage"*.

DAS Budget

Thank you for highlighting that we have come to the end of the existing DAS budget. I've now submitted our updated advice request form, within which, as I understand it, I have requested the 'NSIP statutory advice service' rather than 'DAS'.

Our client is prepared to extend the budget to cover reasonable costs; this said, there is very little to show for the DAS to date. Whilst we do appreciate the challenges which have been posed by the emerging guidance and pressures re. capacity within NE, we are keen to achieve a resolution as soon as possible as we move towards the intended submission date of Q2 2025.

Thanks for your time and we look forward to hearing from you.

Kind regards,

[Redacted signature]

[Redacted contact details]

Please note my working days are Monday to Thursday.

[Redacted box]



From: [REDACTED]
Sent: 08 November 2024 12:09
To: [REDACTED]
Subject: RE: Green Hill Solar DAS Consultation Meeting - 10/04/2024

Hi [REDACTED]

Apologies for the delay in getting back to you, I have now spoken with our wintering bird specialist as well as other specialists in the field - this is a large project and it has the potential to significantly affect Functionally Linked Land availability in the area. The key points from our meetings was that it is important that this project is considered alongside other plans or projects to identify cumulatively how much land is to be lost to species that need open views such as golden plover and lapwing (and skylark actually – though that relates more to Biodiversity Duty rather than protected sites). The in-combination impact must be considered for the construction phase as well as the land taken during operation.

In addition, the size of the development means that mitigation is highly likely to be required and the potential location for this will be worth considering even at this early stage. Desk study work will also be of utmost importance in building a robust evidence base for how birds use the landscape, allowing proper evaluation of the land to be affected. Records should be obtained from county bird recorder/ Biological Records Centre.

The Upper Nene Vally Gravel Pits SPA is in part designated for it's water bird assemblage and potentially some waterbird species may use the site, snipe or green sandpiper may use any damp habits or mallard and teal may use wet ditches. The BESS site is within certainly within 500m Impact Risk Zone for dabbling ducks. The underpinning SSSI is designated for breeding bird assemblages of lowland open waters and their margins (including the largest nesting colony of Grey herons in Northamptonshire). Many of the species included within this assemblage may utilise the BESS site if there are any wet ditches. Herons may use the fields for feeding or loafing.

Until we have greater information available we cannot suggest what mitigation might look like. We would be inclined to accept BTO data in combination with the survey efforts of Green Hill A, B, C, D, E and BESS, and our specialist considered the reduced survey effort for the G site is of less concern if the data from the nearby site (F) is utilised and a precautionary approach is taken as to what could be present.

The rationale for the BESS site would also be of utmost importance.

There are a couple matters further, firstly in relation to cabling; we can't see any work relating to likely cabling work for this project, will it be overhead powerlines? Secondly we have now reached the extent of our DAS advice which means the current contract will need extending – if you could kindly forward the attached forms to the suitable person(s) then we can continue as per NSIP guidance.

Best,

[REDACTED]



From: [REDACTED]
Sent: 24 October 2024 17:14
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Green Hill Solar DAS Consultation Meeting - 10/04/2024
Importance: High

Hi [REDACTED]

Thank you for your email and apologies for the delayed reply. Please see my responses below.

Current Survey Effort

We have already provided this information in previous correspondence, but to confirm:

- To date, we have carried out a full suite of 6 x diurnal surveys across Green Hill A, B, C, D, E and BESS, plus 4/6 surveys at Green Hill F. *Diurnal surveys for Green Hill A.2 and G are commencing this winter.*
- To date, we have carried out a full suite of 3 x nocturnal surveys across Green Hill B, C, D, E, BESS and F. *Nocturnal surveys for Green Hill G are commencing this winter.*

Proposed Survey Effort

Our proposed survey efforts are:

- Green Hill A & A.2 – these parcels are outside of the 10km SPA consultation zone boundary and are therefore not included in the FLL assessment. These parcels will be subject to 6x diurnal wintering bird surveys over one year as standard.
- Green Hill B, C, D, E & BESS – two full years of diurnal surveys (totalling 12 visits) and one full year of nocturnal surveys (3 visits). *These sites would therefore lack a second year of nocturnal survey data under the new two-year requirement.*
- Green Hill F – nearly two full years of diurnal surveys (totalling 10 visits) and one full year of nocturnal surveys (3 visits). *This site would therefore lack two diurnal survey visits and a second year of nocturnal survey data under the new two-year requirement.*
- Green Hill G – one full year of diurnal surveys (totalling 6 visits) and one full year of nocturnal surveys (3 visits), given the later addition of this parcel into the Scheme. *This site would therefore lack a second year of diurnal and nocturnal survey data under the two-year requirement.*

Scheme Location and Size

The attached figure shows the scheme extent. The size of the parcels is as follows:

Site	Area (ha)
Green Hill A	173.6
Green Hill A.2	65.2
Green Hill B	64.7
Green Hill C	56.3
Green Hill D	42.1
Green Hill E	308.5
Green Hill BESS	51.31
Green Hill F	291.2

BESS Site

With regard to Green Hill BESS, this Site is in close proximity to the SPA, but the fields at this site are small and enclosed by tall tree lines/ woodland. Only BESS 1 (the easternmost field) is above 10ha in size (~11ha), whilst the other two fields are much smaller. As such, these fields do not meet the suitability criteria for golden plover which you advised in your previous correspondence. BESS 3 (the northernmost field closest to the SPA) is available for use as mitigation, but as just mentioned does not meet suitability criteria.

Given the poor suitability of the fields, and the absence of golden plover or lapwing from our surveys to date, it seems improbable that the land in Green Hill BESS is inherently valuable for species associated with the SPA.

We are awaiting some input from the wider project team on the rationale for the choice of the BESS site, so please expect this information in due course.

We are keen to obtain your response to our query re. the suitability of our proposed survey scope and mitigation land provision as soon as you are able.

I look forward to hearing from you.

Kind regards,

[Redacted]

[Redacted]

From:

[Redacted]

Subject: RE: Green Hill Solar DAS Consultation Meeting - 10/04/2024

Dear [Redacted]

Before we proceed and in the interests of clarity for the purposes of my colleague Jess, could you please provide the following details to help us determine the suitability of the proposed scheme as FLL mitigation and survey efforts:

- The current survey efforts for each individual parcel of land
- The proposed survey efforts for each individual parcel of land
- A most recent map demonstrating the location and total size (ha) of all parcels of land
- A consideration of all suitable alternative sites for BESS

While, as previously discussed, we would be able to prescribe precautionary FLL mitigation land to those parcels which fall short of the standard survey requirements on a suitability basis, as previously explained, the BESS site is particularly contentious as it lies directly adjacent to the SPA which will, most certainly, provide a large degree of functionality to the SPA and therefore it's loss most likely detrimental to the area and its

notified features. Therefore a full consideration of other suitable sites, as well as the direct need for this particular parcel, will be required.

We look forward to hearing from you in due course.

Best,

[Redacted]

[Redacted]

From:

[Redacted]

Subject: RE: Green Hill Solar DAS Consultation Meeting - 10/04/2024

Hi N

[Redacted]

Thanks for bearing with us on this. We have now had the chance to discuss this in depth with our client, and we have been working on a potential solution that brings together additional survey effort as well as providing a level of precautionary mitigation. We would be grateful for feedback on this approach at this stage.

Firstly, as a summary of our survey results to date, the Sites appear to support very few golden plover over winter. During nocturnal surveys, three individuals were recorded (each in separate locations) at Green Hill E only. These individuals were all recorded during a single visit, and no plovers were recorded during the other two nocturnal surveys completed, suggesting that these areas are not used on a regular basis or by significant numbers of birds. Diurnal surveys also revealed very few golden plover using the Sites; the peak count was 24 birds at Green Hill F in January 2024, and again, no patterns of persistent usage of individual locations/fields within the Scheme was detected. Golden plover are, however, present in greater numbers in the wider landscape; a flock of 70 birds was observed flying northwards off-site adjacent to Green Hill D in November 2023, but were not observed using land within the Scheme itself. I have uploaded our survey results figures for both golden plover and lapwing to WeTransfer so that you can review these – please see here: <https://we.tl/t-FqQU86fTAj> (do let me know if the WeTransfer link expires and i'll send you a new one).

Given that no evidence of Functionally Linked Land has been identified during the surveys completed so far, based on these data, no mitigation is currently deemed to be required. However, we understand that the new guidelines currently being drafted will require two years of survey data to be confident in an assessment of FLL, or else the provision of precautionary mitigation, and so we intend to complete further survey work this winter to bolster our current dataset. This will comprise a second suite of diurnal surveys (6x survey visits) of all land parcels within 10km of the SPA this year.

With the above survey scope completed, the surveys completed at the point of submission (currently anticipated to be ~ Summer 2025) would comprise the following:

- Green Hill A & A2 – these parcels are outside of the 10km SPA consultation zone boundary and are therefore not included in the FLL assessment. These parcels will be subject to 6x diurnal wintering bird surveys over one year as standard.
- Green Hill B, C, D, E, BESS – two full years of diurnal surveys (totalling 12 visits) and one full year of nocturnal surveys (3 visits). *These sites would therefore lack a second year of nocturnal survey data under the new two-year requirement.*

- Green Hill F – nearly two full years of diurnal surveys (totalling 10 visits) and one full year of nocturnal surveys (3 visits). *This site would therefore lack two diurnal survey visits and the second year of nocturnal survey data under the new two-year requirement.*
- Green Hill G – one full year of diurnal surveys (totalling 6 visits) and one full year of nocturnal surveys (3 visits), given the later addition of this parcel into the Scheme. *This site would therefore lack a second year of diurnal and nocturnal survey data under the two-year requirement.*

In lieu of the surveys not completed at the point of submission compared to the forthcoming two full years' requirement, we would intend to provide some precautionary mitigation land as compensation. This would comprise 20.73 ha of land across two adjacent fields within Green Hill E (fields labelled EF29 and EF30 in the attached plan). We have targeted this location given the criteria that you sent over for suitable mitigation land: being fields over 10ha each and the total area of mitigation land being over 20ha. These fields are also some of the closest to the SPA within the Scheme which are of a sufficient size for golden plover; so we would consider this a highly favourable location for plover mitigation land. These fields are currently separated by a species-poor hedgerow in moderate condition (according to BNG condition assessment criteria) and so the removal of this intersecting hedgerow to provide a singular area of 20ha could be explored if this is preferred, given golden plovers' preference for fields over 15ha. We would be happy to discuss land management options with Natural England/LPA ecologists once the extent of mitigation land has been agreed.

We are seeking confirmation from Natural England that the above level of precautionary mitigation is sufficient to compensate for the surveys not completed prior to the submission of the application. Of course, if any evidence of Functionally Linked Land is recorded during the further surveys scheduled this winter, then mitigation/compensation for the loss of these fields would be additional to the precautionary mitigation land identified here. However, if no additional Functionally Linked Land is recorded, then this would be the extent of our proposed mitigation for golden plovers within the Scheme. I would really appreciate if you could please confirm if this is acceptable in principle, and if you have any questions or need additional information, then please do not hesitate to get in touch.

Kind regards,





Item 7

See overleaf.

[REDACTED]

From: [REDACTED]
Sent: 13 February 2025 10:42
To: [REDACTED]
Subject: Green Hill Bird Surveys & BNG Queries

Follow Up Flag: Follow up
Flag Status: Completed

Apologies for the delayed response to some of the queries – we needed to seek specialist input from principal members of the team.

Bird Surveys:

As there is only 1 year of survey effort currently, the mitigation will need to be like for like as you'll need to apply to precautionary principle, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). If you wish to avoid providing mitigation/ deliver less mitigation, this will need to be evidenced through a full 2 years of surveys would be needed.

BNG:

A few thoughts based on the email provided, though it would be good to see a more detailed report/ assessment once this is completed.

- It's correct that BNG is not yet mandatory for NSIPs – this is expected to go live in Nov 2025. Despite it not being mandatory, other NSIPs are actively proposing / delivering BNG.
- We have no current timeline for BNG guidance for NSIPs.
- Our comments are only advisory and intended to help align you with best practice as BNG is not yet mandatory. Though we would expect that any deviations from the Town and Country Planning Act 1990 (as amended) principles (see [Understanding biodiversity net gain - GOV.UK](#)) (e.g. securing habitat for 30 years) should be explained and fully justified within any reports.
- Commitments to BNG should be secured in the DCO.
- You've stated that you will deliver BNG that is 'proportionate' to the development. Is that below the 10%? We would strongly recommend that you aim for the minimum of 10% to align with good practice.
- Land that has temporary impact and can be restored to condition within two years – yes, this is fine, you just need to include this within the metric.
- Any land that will take more than two years to restore can be secured in the DCO.
- You mention sensitive habitats – is there further detail in the assessment? The mitigation hierarchy should be followed to prioritise the avoidance of impact wherever possible.
- You mention including certain parcels and excluding others (e.g. cable corridors) – currently we are advising all NSIPs to include everything within the red line boundary in BNG assessments. However, we understand that these can be subject to change. For information, this is a comment we made to another NSIP:

Natural England note the applicant's position on the determination of the boundary (//). Taking this suggested approach is acceptable prior to mandatory BNG but does not reflect best practice or the approach used for TCPA development. Therefore, any deviation from BNG best practice and principles should continue to be justified and clearly reported. As stated in our previous responses, this may be a matter for the Examining Authority to decide upon.

I hope this is helpful, and please let me know if you'd like a meeting with our BNG lead to clarify any of these points. However, it would be useful to see the assessments first.

Kind regards,


NSIP Senior Officer
West Anglia


Floor 4
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

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Item 8

See overleaf.

[REDACTED]

From: [REDACTED]
Sent: 11 March 2025 12:40
To: [REDACTED]
Subject: RE: Green Hill Bird Surveys & BNG Queries

Hi [REDACTED]

I can confirm the survey efforts are acceptable as is – as long a precautionary view is taken for the few missing surveys and not assumed as 0 counts etc.

We would appreciate seeing the results when you have the and then looking at mitigation as a whole, as opposed to the 20ha for the missing surveys.

I hope this is helpful.

Kind regards,
Jess

From: [REDACTED]
Sent: 11 March 2025 09:06
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Green Hill Bird Surveys & BNG Queries

Hi [REDACTED]

Apologies to chase, but given the delays we have already faced in the DAS process, we are keen to find a resolution to this enquiry as soon as possible – do you have any updates on this?

Many thanks,
[REDACTED]

[REDACTED]
Senior Ecologist
Clarkson & Woods Ltd.



Overbrook Business Centre
Poolbridge Road, Blackford
Somerset, BS28 4PA

From: [REDACTED]
Sent: 03 March 2025 09:46
To: [REDACTED]
Subject: RE: Green Hill Bird Surveys & BNG Queries

Thank you for your email. I'll get back to you as soon as I can.

Kind regards,

[REDACTED]

From: [REDACTED]

[REDACTED]

Subject: RE: Green Hill Bird Surveys & BNG Queries

Hi [REDACTED]

Just to clarify a typo in the below table – in the comments section for Sites Green Hill A and A.2, the comment should read '[Outside 10km consultation zone so site has been omitted from any nocturnal surveys and second year of diurnal surveys](#)'. I have amended below.

Many thanks,

[REDACTED]

[REDACTED]
Senior Ecologist
Clarkson & Woods Ltd.

[REDACTED]
[REDACTED]



Overbrook Business Centre
Poolbridge Road, Blackford
Somerset, BS28 4PA

From: [REDACTED]

Sent: 25 February 2025 16:55

To: [REDACTED]

Subject: RE: Green Hill Bird Surveys & BNG Queries

Hi [REDACTED],

Apologies for the slightly delayed response – I was on leave last week. I have laid out responses to your queries as clearly as possible below, and we hope that this will allow you to answer our query re. the degree of precautionary mitigation needed.

Survey Effort

As you are aware, we were first advised by Nima that one year of survey would be sufficient to assess impacts on the SPA (email dated 10/04/2024), before this position was revised (email dated 05/09/2024). We subsequently agreed our survey scope with Nima (email dated 04/12/2024), which set out that two years of diurnal visits would be undertaken as far as possible, alongside a single year of nocturnal surveys. A precautionary approach to mitigation would be agreed with Natural England in light of any survey deficits.

Since this correspondence, we have been endeavouring to complete as much of a second year of survey work as possible in the background, within the constraints of the submission deadline. We have now (as of last

week) managed to complete a second season of nocturnal surveys across the majority of the sites, which reduces the previously identified survey deficit significantly. As such, at the point of submission we will have completed the following surveys:

Site	Diurnal Wintering Bird Surveys		Nocturnal Wintering Bird Surveys		Comments
	No. Survey Visits		No. Survey Visits		
	Year 1	Year 2	Year 1	Year 2	
Green Hill A	6	n/a	n/a	n/a	Outside 10km consultation zone so site has been omitted from any nocturnal surveys and second year of diurnal surveys. Outside 10km consultation zone so no site has been omitted from second year or any nocturnal surveys
Green Hill A.2	6	n/a	n/a	n/a	Outside 10km consultation zone so site has been omitted from any nocturnal surveys and second year of diurnal surveys. Outside 10km consultation zone so no site has been omitted from second year or any nocturnal surveys
Green Hill B	6	6	3	3	Full 2 year scope
Green Hill C	6	6	3	3	Full 2 year scope
Green Hill D	6	6	3	3	Full 2 year scope
Green Hill E	6	6	3	3	Full 2 year scope
Green Hill BESS	6	6	3	3	Full 2 year scope
Green Hill F	4	6	3	3	Site introduced to the Scheme later, hence a partial first year of diurnal surveys completed.
Green Hill G	0	6	0	3	Site introduced to the Scheme later, hence only 1 full year of diurnal and nocturnal surveys achievable

As such, the only survey shortfalls are two diurnal visits at Green Hill F, and one year of both diurnal and nocturnal surveys at Green Hill G (highlighted in yellow above).

Precautionary Mitigation for Shortfall in Survey Effort

We are seeking to confirm that the 20.73ha mitigation package put forward to account for the shortfall in survey effort (as above, this is the minor shortfall in diurnal visits at Green Hill F, and the single season of diurnal and nocturnal visits at Green Hill G) is acceptable. I would also reiterate that, as I said in my previous email, this precautionary mitigation package is entirely separate from the mitigation that will be provided for any fields confirmed as FLL. We are hoping to discuss our FLL assessment with you in due course, once we have finished analysing results from the final surveys. We do not intend to conduct any further survey work after submission of the DCO, and so this can be considered the full survey scope that our assessments will be based on.

We look forward to hearing from you at your earliest convenience.

Many thanks,



Senior Ecologist
Clarkson & Woods Ltd.
T: 01934 712500

E: [REDACTED]



Overbrook Business Centre
Poolbridge Road, Blackford
Somerset, BS28 4PA

From: [REDACTED]
Sent: 19 February 2025 10:18
To: [REDACTED]
Subject: RE: Green Hill Bird Surveys & BNG Queries

Good morning,

Please could you clarify which surveys have not been completed for each parcel? Sorry, trying to get my head around which areas do and do not have the two years so I can make sure we're being appropriate with what is being requested. (I think there are some parcels that have had some surveys on year two, just not the complete amount?)

Also, it says these are incomplete at point of submission, are you planning on completing these mid DCO? And if so, will the mitigation package change based on full data?

Thanks a lot,

[REDACTED]

From: [REDACTED]
Sent: 13 February 2025 15:45
To: [REDACTED]
Subject: RE: Green Hill Bird Surveys & BNG Queries
Importance: High

You don't often get email from [REDACTED]

Dear [REDACTED]

After reviewing your response to our golden plover mitigation approach, we are very concerned that this has not considered the detailed justification of our approach, and has not clarified Natural England's position with regard to the precautionary approach to mitigation that we have put forward in lieu of incomplete survey data. As such, I have reiterated our approach below, and we would greatly appreciate if your team could provide a more detailed consideration of our mitigation offering as soon as possible. We would be happy to have an online meeting to discuss this issue in further detail if that would be useful – please do let me know.

You noted in your response that *'there is only 1 year of survey effort currently'*, but we have provided a comprehensive summary of the diurnal and nocturnal wintering bird survey work that will be completed at the

point of submission in our email correspondence on the following dates: 09/10/2024, 24/10/2024, 12/12/2024, and 14/01/2025. To reiterate, the survey work completed at the point of submission will comprise two full years of diurnal wintering bird surveys as Green Hill B, C, D, E and BESS, almost two full years (excluding two of the twelve surveys) at Green Hill F, and one full year at Green Hill G only. This is complemented by one full year of nocturnal bird surveys at all of the above sites. Green Hill A and A.2 have been discounted from this discussion, owing to their location which is outside of the 10km consultation zone for the Upper Nene Valley Gravel Pits SPA.

In order to account for the minor shortfall of diurnal survey work at Green Hill F, the 2nd year of diurnal surveys at Green Hill G, and the 2nd year of nocturnal surveys at all of the above sites, we have put forward a mitigation package comprising 20.73ha of land over two fields in the south of Green Hill E – a plan showing the locations of these fields was attached to our email correspondence on 09/10/2024 and 12/12/2024. These fields were targeted on the basis of the criteria that Natural England provided for suitable fields for golden plover. **To reiterate: these fields have not been put forward to account for the loss of any identified Functionally Linked Land within the project, and any FLL which is identified through the surveys completed across the sites will be mitigated for through an entirely separate mitigation offering.** Our wintering bird surveys are still in progress but will be completed this month, and therefore full FLL analysis based on our survey data is currently being undertaken. We would be happy to share the outcomes of this assessment with you and discuss the full FLL mitigation package once this process has been completed, **but we are currently only seeking agreement on the fields (comprising 20.73ha) that will be provided on a precautionary basis to account for the incomplete survey data at the point of submission.**

This was the approach that was suggested by Nima in his DAS correspondence on 20/08/2024, where he stated the following:

*'We have also, since we last spoke, been part of a joint effort with the Wildlife Trust, and indeed the local authority, in relation to functionally linked land and our requirements for a site (or series of sites) like this. What that looks like for the total area of sites currently forming part of the proposal is 2 seasons of wintering bird surveys **or a prescribed area of mitigation without the need for further survey efforts.** We can discuss on the call just what mitigation might look like for this particular proposal.'*

We have therefore sought Natural England's opinion on the 20.73ha of land which we have put aside as precautionary mitigation to account for the survey data that will not be completed by DCO submission on the above basis since October 2024. Given the survey results that we have recorded to date across all of the sites which have indicated low levels of use by golden plover (a summary of survey results was provided in our correspondence on 09/10/2024, and was also included in our PEIR, which Natural England have reviewed), we feel that this level of mitigation land represents a highly precautionary approach for the missing survey data. We have not yet received any definitive stance from Natural England on this offering, despite several attempts to seek your advice on this matter.

Your final sentence on the bird survey matter below states *'If you wish to avoid providing mitigation/ deliver less mitigation, this will need to be evidenced through a full 2 years of surveys would be needed.'* We would like to reassure you that we have never attempted to avoid providing mitigation for golden plover or potential impacts on the SPA. This has been evidenced through our repeated attempts to consult with Natural England on our survey approach and mitigation offering, and seek NE's advice on what constitutes an acceptable level of mitigation for this project.

Hopefully you can appreciate our concern at the lack of clear advice that we have received on this matter to date, and we would greatly appreciate if the DAS team could take another look at this and provide a more detailed response. We look forward to hearing from you.

Kind regards,

[Redacted Signature]

[Redacted Name]
Senior Ecologist



Overbrook Business Centre
Poolbridge Road, Blackford
Somerset, BS28 4PA

From:

Subject: Green Hill Bird Surveys & BNG Queries

Apologies for the delayed response to some of the queries – we needed to seek specialist input from principal members of the team.

Bird Surveys:

As there is only 1 year of survey effort currently, the mitigation will need to be like for like as you'll need to apply to precautionary principle, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). If you wish to avoid providing mitigation/ deliver less mitigation, this will need to be evidenced through a full 2 years of surveys would be needed.

BNG:

A few thoughts based on the email provided, though it would be good to see a more detailed report/ assessment once this is completed.

- It's correct that BNG is not yet mandatory for NSIPs – this is expected to go live in Nov 2025. Despite it not being mandatory, other NSIPs are actively proposing / delivering BNG.
- We have no current timeline for BNG guidance for NSIPs.
- Our comments are only advisory and intended to help align you with best practice as BNG is not yet mandatory. Though we would expect that any deviations from the Town and Country Planning Act 1990 (as amended) principles (see [Understanding biodiversity net gain - GOV.UK](#)) (e.g. securing habitat for 30 years) should be explained and fully justified within any reports.
- Commitments to BNG should be secured in the DCO.
- You've stated that you will deliver BNG that is 'proportionate' to the development. Is that below the 10%? We would strongly recommend that you aim for the minimum of 10% to align with good practice.
- Land that has temporary impact and can be restored to condition within two years – yes, this is fine, you just need to include this within the metric.
- Any land that will take more than two years to restore can be secured in the DCO.
- You mention sensitive habitats – is there further detail in the assessment? The mitigation hierarchy should be followed to prioritise the avoidance of impact wherever possible.
- You mention including certain parcels and excluding others (e.g. cable corridors) – currently we are advising all NSIPs to include everything within the red line boundary in BNG assessments. However, we understand that these can be subject to change. For information, this is a comment we made to another NSIP:

Natural England note the applicant's position on the determination of the boundary (/). Taking this suggested approach is acceptable prior to mandatory BNG but does not reflect best practice or the approach used for TCPA development. Therefore, any deviation from BNG best practice and principles should continue to be justified and clearly reported. As stated in our previous responses, this may be a matter for the Examining Authority to decide upon.

I hope this is helpful, and please let me know if you'd like a meeting with our BNG lead to clarify any of these points. However, it would be useful to see the assessments first.

Kind regards,

NSIP Senior Officer
West Anglia

Floor 4
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

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Item 9

See overleaf.

Meeting Notes



Green Hill Solar Farm - North Northamptonshire Planning, Landscape and Ecology meeting

DATE: 29/02/2024

TIME: 09:00-10:40

PLACE: Teams

ATTENDEES:

Nicola Thomson (NT) - North Northants Planning
Ryan Mills (RM) - Planscape (for North Northants)
Gareth Ryman (GR) - Consultant Ecologist

Charles Judson (CJ) - Lanpro - Planning
Mark Topping (MT) - Lanpro - Landscape
Chris Poole (CP) - Clarkson and Woods - Ecology

AGENDA:

Presentation followed by Q and A

NOTES:

CJ provided general overview of the site, the proposal and the project timescales using presentation slides.

GR - Question about how site will be managed.

CP and CP - Still subject to consideration and no decisions have been made on this.

GR - Identified current BESS application at Grendon.

CJ - Advised that this was separate from the proposal and would be included as required as part of any cumulative assessment.

GR - Unable to attend the Co:design workshops. Can the pdf constraints plans be shared? CJ to consider this and come back.

GR - Identified that Nature Recover Networks are being established and that given the scale of the scheme this should be considered.

RM - Unable to attend Technical workshop on 15th March. Will a summary be provided?

CJ - Yes Comms team will be recording feedback and producing a report on the co:design workshops.

GR - Solar often fails to consider ground nesting birds. He is investigating with Nature Space the implementation of District Level Licensing for ground nesting birds.

CP - Would be interested in looking into this further (noting that they are looking into DLL for GCN).



GR - CP can contact andy.buxton@naturespaceuk.com.

GR - Need to consider impacts on SPA and consider functionally linked land and whether this is affected by the proposals.

CP - This forms part of the survey strategy.

GR - How many seasons are we looking to do? Natural England (NE) have been asking for more than 1.

CP - We are consulting NE through the Discretionary Advice Service. 2 years worth of surveys has not yet come up but will be raised as part of the next questions/meeting due to take place w/c 11th March.

GR - He would like to attend this meeting with NE.

CP - Happy to bring LPA in on this if they wish.

CP - Set out surveys undertaken to date which started in August 2023. UK Hab and general conditions; ground level tree assessment; static bat surveys Aug-Oct and will recommence; Otter and Water Voles. 6 Wintering bird surveys. 3 x Nocturnal Surveys planned for this winter. Scope of these surveys is being agreed with NE. Investigating DLL and also proposing GCN surveys 250m from site boundary and cable route (once refined). Morph surveys being undertaken for BNG purposes. Data searches and desk based assessments also being used. CP emphasised that they are very mindful of the SPA.

GR - Are we doing modeling to look at functionally linked land to see how likely it is that qualifying species will be there?

CP - Hasn't done this previously. Initial data suggests that numbers of Plovers are low (albeit single snapshot on a night). Also looking into acoustic monitoring. CP to look into modelling.

GR - has concerns that monitoring has not historically been good.

CP - Identified that Clarkson and Woods have led on developing best practice guidance for monitoring as they recognise the importance of it.

GR - Need to consider wildfire risks (for example from light reflecting off panels. Could fire breaks be introduced or dry stone walls? GR identified that this is a risk to BNG and could 'reset the clock'.

MT - This is an interesting point and will be taken away for legal advice.

MT - Used public GIS to talk through the constraints and how layers are built up for the environmental masterplan process. Sites are numbered and fields are numbered for ease of reference and precision.

GR - Landscape mitigation will need to be reflected in the submitted BNG metric and related BNG condition assessments.

MT - Traditional topo survey has been undertaken.

MT - All information gathered will feed into the environmental masterplan process holistically with all disciplines. The final output will be the mitigation plans upon which the landscape assessment is based.

MT - Due to the disparate location of the sites there is limited intervisibility. He will be seeking to agree approach to assessment on this point with the LPA.

MT - Photography - Needs to be representative but proportionate. Will seek to agree approach with the LPA. Also need to discuss and agree approach to photomontages.

RM - Is winter photography being done now?

MT - No, but want to agree approach with LPA that is proportionate. RM will give this consideration. RM advised that on other schemes they have sought to ensure that settlements and communities are well represented with more flexibility for PROWs.



RM - Is GIS mapping available online?

CJ - Not currently - this is being looked into.

GR and RM requested that this is shared with them if it becomes available.

NT - Has a site visit been requested by Parish Councils in the briefings you have held?

CJ - No. Potential requests to attend Parish Council meetings but awaiting to hear formally on this.

NT - Is it likely that any sites would be dropped if deemed to be unsuitable for solar?

CJ - Iterative design process needs to be undertaken to determine location for any infrastructure, landscaping and mitigation etc.

MT - Sites will have been assessed for suitability as part of site search, unlikely that any site would be dropped entirely from the scheme, but design process will define what will be located where.

RM - Can LPA have GIS shapefiles?

MT - This will need to go back to the client.

RM - Could mitigation be outside of red line?

MT - Not currently considering this from a landscape perspective. From experience this tends to be for ecology.

RM - Will review Cottam and West Burton documents for approach adopted there as background understanding.

GR - What happens to habitats after decommissioning?

MT - This is being reviewed with the legal team and also needs to be aligned with the leases for the land. If habitats are created these could become protected through other legislation (eg could become SSSI).

GR - discussed issue of BNG "stacking".

RM - confirmed that he is open to a discussion regarding the use of non-native species mix if included to mitigate climate change.

GR - Identified that a 'Green Phasing Plan' should be provided with DCO.

MT - Advised that the phasing will be part of the OLEMP and CEMP. From an assessment perspective they intend to assess at year zero and year 15. OLEMP will have a mechanism to review landscaping management after 15 years.

RM - Happy to start discussion regarding proposed viewpoints.

MT - Suggested use of regular workshops to discuss landscape matters which RM was open to attending.

ACTIONS:

CJ to speak to client about sharing a pdf of the constraints and shapefiles for GIS.

CJ to consider the risk of wildfires and the implications for BNG and 'resetting the clock'.

CJ to notify LPA if the GIS mapping is made available on the website.

CP to involve GR in meeting with NE

All - methodologies to be part of ongoing discussions.



Item 10

See overleaf.

From:

Sent:

07 January 2025 17:05

To:

Subject:

RE: Green Hill Solar Farm - Ecology Round Table Meeting

Attachments:

Green Hill PEIR_Appendix 9.5_Badger Survey Results.pdf

Follow Up Flag:

Follow up

Flag Status:

Flagged

Hi all,

Thank you Charlotte (CW), Sven (SR) and Kathryn (KP) for meeting with Harry (HF) and myself (MH) on 19th December. It was good for everyone to be introduced, to set the scene for the project and to discuss some matters of interest.

For clarity, the matters discussed are itemised below. If you have anything to add, please do so.

In response to your request, please also find attached our badger survey report, which is a technical appendix to the PEIR. I've also provided below a breakdown of the surveys we have completed to date, and the elements remaining.

Minutes

- HF introduced the project, Clarkson and Wood's involvement and our expertise in the solar industry.
- MH discussed the survey scope, how this covers the entirety of the red line boundary and how the scheme design has evolved with respect to fields now marked for mitigation, and the refinement of the preferred cable route corridor.
- MH discussed engagement to date with NE and the DAS advice received with respect to golden plovers and the SPA, including the need for two years' of survey and provision of some mitigation land in lieu of a full two-year survey package at the point of submission.
- MH and HF also clarified the lack of any Functionally Linked Land (FLL) recorded by surveys to date.
- It was discussed that cropping information would be beneficial to help determine suitable fields and preference by golden plovers. This information will be provided for all fields where golden plovers have been recorded, or those earmarked for mitigation.
- CW advised that the new SPD for FLL mitigation was still in its early stages and unlikely to be ready for the DCO submission.
- CW advised that species associated with Pitsford Water SSSI be highlighted and appropriately considered in our ES. HF confirmed this would be done.
- KP highlighted that other Milton Kenyes designated sites be scoped into our assessment, if not already done so - MK Wildlife Corridors and Biological Notification Sites carry same weight as LWSs.
- CW advised that the West Northants LNRS would be unlikely to be ready for the DCO submission. MH confirmed that habitat opportunities mapping had already been purchased for North Northants. CW said she would check if this was available for West Northants. MH confirmed that habitat creation and enhancement agreements as part of the Scheme will take account of local habitat priorities.
- KP queried whether bat trapping studies had been completed. HF confirmed that, as per the typical scope for NSIPs, these had not been done, but that the scheme incorporates wide buffers from valuable habitats and will seek to connect trees and hedgerows for landscape permeability.

- KP asked if monitoring of bat activity would be pursued during operation. HF advised this would be done and that IGP are keen to be seen as models in the industry in terms of developing understanding and research opportunities.
- SR asked about the width of the cable route. MH explained that the initial search area had been narrowed down to a current 100m wide swathe, which would be surveyed in January, with further habitat condition assessments as needed. HF explained how this would be refined to a narrower corridor and how the cable would be laid, with an adjacent haul route and periodic site compounds. HF also explained how the eventual cable would be micro-sited within the ~50m corridor agreed within the DCO application.
- MH asked that contact details, including email addresses and phone numbers, where relevant, be shared among the team for ease of communication. SR advised that he is currently on a short-term contract and that for continuity it may be best to send comms to the general North Northants inbox. SR/ CW also said it may be advisable to involve Heather Webb, who works across both North and West Northants.

Survey Scope

- UKHab surveys – completed across all sites, with condition assessments at an appropriate time of year.
- MoRPh surveys – scheduled for all watercourses – ongoing, completion Feb 2025.
- Bat activity surveys – 43 static detectors deployed across the Scheme, April-Oct, for a minimum of 5 nights/ deployment. Completed at all sites bar A.2 (completion May 2025).
- Badger surveys – completed across all sites.
- Otter and water vole surveys – spring and autumn surveys of all suitable watercourses – completed across all sites except A.2 and G (completion March/April 2025).
- Dormice – scoped out.
- Reptiles -scoped out.
- GCN – DLL pursued.
- BBS – 6 x visits, plus one dusk visit – completed across all sites bar A.2 (completion May 2025).
- WBS – 6 x visits at all sites, plus a second year of survey at all sites within 10km of the SPA, within constraints of submission date (bearing in mind later introduction of some parcels).
 - Green Hill A – 6 x surveys completed. No further surveys.
 - Green Hill A.2 – 6 x surveys completed. No further surveys.
 - Green Hill B – 10 x surveys completed, 2 remaining – completion Feb 2025.
 - Green Hill C – 10 x surveys completed, 2 remaining – completion Feb 2025.
 - Green Hill D – 10 x surveys completed, 2 remaining – completion Feb 2025.
 - Green Hill E – 10 x surveys completed, 2 remaining – completion Feb 2025.
 - Green Hill F – 8 x surveys completed, 2 remaining – completion Feb 2025. Not quite 2 years' survey effort due to later introduction to the Scheme.
 - Green Hill BESS – 10 x surveys completed, 2 remaining – completion Feb 2025.
 - Green Hill G – 4 x surveys completed, 2 remaining – completion Feb 2025. Only 1 year's survey effort due to later introduction to the Scheme.
- Nocturnal WBS for golden plover – 3 x visits completed in one winter season across all sites except G (completion Feb 2025).
- Cable route walkovers – habitat assessment and suitability for protected/ notable species – scheduled for January 2025, with condition assessments in spring as needed.

Future Meetings

We are conscious that it would be beneficial to involve Paul in a future meeting, and potentially also bring in Sarah Postlethwaite and Heather Webb. Could we have a meeting later this month? Are there any dates which are unsuitable (please note we operate a 4-day working week, Monday-Thursday)?

I trust this is clear and helpful, but if you have any queries or additional thoughts on the above, please get in touch with myself, Chris or Harry. Likewise, as the Scheme progresses we are keen to maintain open lines of communication for questions and inputs.

Thanks again for your time.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 16 December 2024 16:02
To: [REDACTED]
Subject: RE: Green Hill Solar Farm - Ecology Round Table Meeting

Hi all,

Many thanks for getting back to me separately with your availability for the below meeting. We would greatly appreciate if we could book in a meeting with you all this **Thursday (19th December) at 2pm** please.

@ [REDACTED] I understand from Paul Everard's email that Paul Evans is currently on medical leave, but that you are happy to stand in for him on 19th, so thank you very much for this. My colleagues Mike Hockey and Harry Fox will be attending from our side.

[REDACTED] if there is anything you would like to discuss once you are back from leave, we would be happy to have a follow up meeting with you in the New Year.

I will send over a Teams meeting for Thursday shortly.

Many thanks,

[REDACTED]

[REDACTED]
Senior Ecologist
Clarkson & Woods Ltd.

[REDACTED]

[REDACTED]



Overbrook Business Centre
Poolbridge Road, Blackford
Somerset, BS28 4PA

From: [REDACTED] ole
Sent: 11 December 2024 15:51
To: [REDACTED]
Subject: Green Hill Solar Farm - Ecology Round Table Meeting

Dear all,

I hope you are all well. We (Clarkson & Woods Ltd.) are the ecologists working on the upcoming DCO scheme known as Green Hill Solar Farm. We have been given your contact details by Charlotte Astrella at Lanpro, who I believe has been in regular contact with each of your councils regarding the scheme/consultation. I have also been in touch with some of you in the past in the hopes of arranging a round-table meeting to discuss the ecological elements of the scheme, but I understand that there have been some staffing changes and PPA delays in the past, so these efforts were delayed. Given that the scheme design is now progressing, I'm now getting back in touch with the hope to arrange a meeting between us all at your earliest convenience.

During the meeting (on Microsoft Teams), we would intend to give you a brief summary of our survey and assessment work completed to date, as well as to discuss our approach to site design and mitigation to date. We would welcome any questions you had on the scheme, as well as hearing any potential feedback or concerns you have, so that we can address these before application submission. Ideally this would be a single meeting with all parties so that we can ensure we are all on the same page, but if availability does not allow this, we would be happy to have individual meetings instead.

I would propose the following dates and times – if you could please get back to me with which of these dates work for you, I will look to arrange the meetings and send out invitations:

- Tuesday 17th December – 2pm
- Thursday 19th December – 2pm
- Monday 23rd December – 11am or 2pm
- Tuesday 7th January – 2pm

I look forward to hearing from you at your earliest convenience. In the meantime, if you had any queries, please don't hesitate to get in touch.

Many thanks,

[Redacted]

[Redacted]

Senior Ecologist
Clarkson & Woods Ltd.

[Redacted]



Overbrook Business Centre
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Somerset, BS28 4PA