

Green Hill Solar Farm

EN010170

The Applicant's Responses to Relevant Representations

Prepared by: Lanpro Services

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The Infrastructure Planning (Examination Procedure) Rules 2010

Rules 8(1)(c)



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Issue Sheet

Report Prepared for: Green Hill Solar Farm
Examination Deadline 1

The Applicant's Responses to Relevant Representations

Prepared by

Name: Stephen Flynn

Job title: Senior Planner

Approved by

Name: Jane Crichton

Job title: Associate Planning Director

Revision	Date	Prepared by	Approved by
Original	07/11/2025	SF	JC



1 Introduction

1.1 Purpose of the Document

- 1.1.1 This document provides Green Hill Solar Farm Limited (the 'Applicant's') response to the Relevant Representations (RRs) which were published by the Planning Inspectorate (PINS) on 21 August 2025, relating to the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').
- 1.1.2 The period for registering as an Interested Party through the submission of a relevant representation ran from 3 July to 14 August 2025. The Applicant confirmed that it has complied with sections 56 and 51 of the Planning Act 2008 and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Application and accompanying documents and information and publishing it in the required manner.
- 1.1.3 A total of 1,254 RRs were submitted to the Examining Authority by Interested Parties in response to the Scheme DCO Application and were published on the PINS website on 21 August 2025.

1.2 Structure of the Report

- 1.2.1 This document provides a response from the Applicant to the matters raised in the Relevant Representations and is structured as follows:
- **Table 1.1** sets out the list of acronyms used for management documents that form part of the Applicant's submission, that are referred to in response to each Relevant Representation.
 - **Table 1.2** lists the RRs received from the host local authorities (Milton Keynes City Council, North Northamptonshire Council, and West Northamptonshire Council). The Applicant notes that Bedford Borough Council, the nearest neighbouring authority, have not made a representation at this stage. These responses are analysed and responded to in full in **Section 2** of this document.
 - **Table 1.3** lists all statutory consultees, international agencies, undertakers, and elected representatives with whom the Applicant has undertaken a Statement of Common Ground. These responses are analysed and responded to in full in **Section 3** of this document.
 - **Table 1.4** lists all other statutory consultees, international agencies, undertakers, and elected representatives. These responses are analysed and responded to in full in **Section 4** of this document.
 - **Table 1.5** lists the RRs received from parish councils, parish meetings, or neighbourhood community groups. These responses are analysed and responded to in full in **Section 5** of this document.
 - **Table 1.6** lists those whose interests would be affected by the Order (as listed within the **Book of Reference [EX1/GH4.3_B]**). These responses are analysed and responded to in full in **Section 6** of this document.



- **Table 1.7** lists the Theme Options in which Relevant Representations from members of the public and all remaining organisations and businesses are categorised into and responded to in **Section 7** of this document.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Green Hill Solar Farm [Examination Library](#).

1.2.3 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 1 to the Planning Inspectorate.

1.2.4 Additionally, submissions to the Planning Inspectorate following 21 October 2025 carry revised indications to identify by which deadline the submission had been made to the Planning Inspectorate. All documents submitted to the Planning Inspectorate by 23 May 2025 carry '/APP/' within their document reference. Those new submissions made to the Planning Inspectorate post-submission and during the pre-examination stage carry '/PEX/' instead of '/APP/' within the document reference, to reflect the submission being made during the pre-examination stage. Those new submissions, such as this document, being submitted for and by Deadline 1 carry '/EX1/' within the document reference.

Table 1.1: List of Acronyms for Submission Documents

Acronym	Document Name
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
PRA	Preliminary (Geo-Environmental) Risk Assessment
OCEMP	Outline Construction Environmental Management Plan
OOEMP	Outline Operational Environmental Management Plan
ODS	Outline Decommissioning Statement
OLEMP	Outline Landscape and Ecological Management Plan
OEPMS	Outline Ecological Protection and Mitigation Strategy
OSMP	Outline Soil Management Plan
OBSSMP	Outline Battery Storage Safety Management Plan
OSSCEP	Outline Skills Supply Chain and Employment Plan
OCTMP	Outline Construction Traffic Management Plan
OPROWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
CDPP	Concept Design Parameters and Principles



Acronym	Document Name
EqIA	Equality Impact Assessment
HRA	Habitat Regulations Assessment
OOTMP	Outline Operational Traffic Management Plan

1.3 Tables of Organisations Submitting Relevant Representations

Table 1.2: List of Organisations whose Relevant Representations are Responded to in Section 2.

Examination Library Reference	Acronym	Relevant Representation Received from
RR-1233	MKCC	Milton Keynes City Council
RR-1243	NNC	North Northamptonshire Council
RR-1251	WNC	West Northamptonshire Council

Table 1.3: List of Organisations whose Relevant Representations are Responded to in Section 3.

Examination Library Reference	Acronym	Relevant Representation Received from
RR-1214	AW	Anglian Water Services
RR-1224	EA	Environment Agency
RR-1228	HE	Historic England (HBMCE)
RR-1240	NGET	National Grid Electricity Transmission Plc
RR-1241	NH	National Highways
RR-1242	NE	Natural England
RR-1245	NFRS	Northamptonshire Fire and Rescue Service

Table 1.4: List of Organisations whose Relevant Representations are Responded to in Section 4.

Examination Library Reference	Acronym	Relevant Representation Received from
RR-1037	SBMP	Sarah Bool MP
RR-1109	SAMP	Stuart Andrew MP
RR-1221	CPRE	CPRE Northamptonshire
RR-1225	FC	Forestry Commission

**Table 1.5: List of Organisations whose Relevant Representations are Responded to in Section 5.**

Examination Library Reference	Acronym	Relevant Representation Received from
RR-1216	BoPC	Bozeat Parish Council
RR-1218	CRNBPC	Clifton Reynes and Newton Blossomville Parish Council
RR-1219	CWPC	Cogenhoe & Whiston Parish Council
RR-1222	EBPC	Earls Barton Parish Council
RR-1223	EMPM	Easton Maudit Parish Meeting
RR-1226	GrPC	Grendon Parish Council
RR-1227	HaPC	Hannington Parish Council
RR-1229	HoPC	Holcot Parish Council
RR-1230	LaPC	Lavendon Parish Council
RR-1232	MAPC	Mears Ashby Parish Council
RR-1234	MoPC	Moulton Parish Council
RR-1244	NBG	Northamptonshire Badger Group
RR-1246	OITC	Olney Town Council
RR-1247	ScPC	Scaldwell Parish Council
RR-1248	SGHS	Stop Green Hill Solar
RR-1249	WaPC	Walgrave Parish Council
RR-1250	WWAG	Wellingborough Walks Action Group Ltd
RR-1252	WiPC	Wilby Parish Council
RR-1253	WoPC	Wollaston Parish Council

Table 1.6: List of Organisations whose Relevant Representations are Responded to in Section 6.

Examination Library Reference	Acronym	Relevant Representation Received from
RR-0118	BLi	Bernard Livesey
RR-0180	CAw	Chris Aworth
RR-0267	DRN	David Richard Newton
RR-0268	DRu	David Rust
RR-0448	HEI	Helen Elderkin
RR-0452	HMa	Helen Marriott



Examination Library Reference	Acronym	Relevant Representation Received from
RR-0490	JCI	James Clegg
RR-0560	JHo	John Hope (Trinity Land)
RR-0574	JFe	Jonathan Fenn
RR-0768	Mho	Martin Howell
RR-0792	MRu	Maureen Rust
RR-0796	MFr	Melisa French
RR-0825	Cle	Mr & Mrs Clegg
RR-0895	PHe	Patricia Heslop
RR-0986	RHo	Robert Hollis
RR-1061	SPa	Serien Partridge
RR-1065	SFe	Sharon Fenn
RR-1217	CUK	Cellnex UK (On Tower UK 1 Limited)
RR-1220	CoM	Cooperb Motorcycles
RR-1254	TL	Trinity Land Ltd.



Table 1.7: List of Theme Options in which Relevant Representations from Members of the Public and All Remaining Organisations and Businesses are Categorised into and Responded to in Section 7.

Theme Options	Acronym	Relevant Representation responded to through the Theme Option
Agriculture and Soils	AGR-	RR-0001; RR-0006; RR-0007; RR-0015; RR-0016; RR-0024; RR-0026; RR-0029; RR-0030; RR-0031; RR-0033; RR-0035; RR-0042; RR-0043; RR-0045; RR-0048; RR-0049; RR-0050; RR-0051; RR-0053; RR-0056; RR-0057; RR-0058; RR-0059; RR-0061; RR-0064; RR-0065; RR-0070; RR-0071; RR-0072; RR-0075; RR-0080; RR-0082; RR-0083; RR-0088; RR-0089; RR-0091; RR-0092; RR-0094; RR-0096; RR-0097; RR-0098; RR-0100; RR-0101; RR-0102; RR-0104; RR-0105; RR-0112; RR-0116; RR-0117; RR-0121; RR-0122; RR-0125; RR-0127; RR-0129; RR-0130; RR-0132; RR-0134; RR-0140; RR-0145; RR-0146; RR-0151; RR-0155; RR-0158; RR-0161; RR-0162; RR-0163; RR-0164; RR-0168; RR-0169; RR-0171; RR-0173; RR-0176; RR-0177; RR-0181; RR-0184; RR-0185; RR-0186; RR-0187; RR-0193; RR-0197; RR-0201; RR-0203; RR-0204; RR-0211; RR-0214; RR-0215; RR-0216; RR-0217; RR-0218; RR-0219; RR-0220; RR-0224; RR-0227; RR-0236; RR-0237; RR-0240; RR-0241; RR-0242; RR-0243; RR-0244; RR-0245; RR-0250; RR-0251; RR-0252; RR-0254; RR-0255; RR-0256; RR-0258; RR-0261; RR-0262; RR-0263; RR-0264; RR-0265; RR-0266; RR-0269; RR-0270; RR-0274; RR-0283; RR-0285; RR-0289; RR-0294; RR-0297; RR-0298; RR-0299; RR-0303; RR-0305; RR-0307; RR-0310; RR-0313; RR-0315; RR-0317; RR-0318; RR-0319; RR-0320; RR-0321; RR-0323; RR-0327; RR-0331; RR-0332; RR-0333; RR-0334; RR-0336; RR-0337; RR-0340; RR-0344; RR-0345; RR-0347; RR-0349; RR-0350; RR-0353; RR-0355; RR-0359; RR-0363; RR-0364; RR-0365; RR-0368; RR-0372; RR-0373; RR-0375; RR-0380; RR-0382; RR-0384; RR-0386; RR-0387; RR-0388; RR-0390; RR-0391; RR-0392; RR-0400; RR-0401; RR-0402; RR-0405; RR-0406; RR-0408; RR-0409; RR-0413; RR-0414; RR-0416; RR-0422; RR-0423; RR-0424; RR-0429; RR-0431; RR-0432; RR-0435; RR-0440; RR-0444; RR-0445; RR-0446; RR-0449; RR-0453; RR-0456; RR-0459; RR-0460; RR-0461; RR-0462; RR-0464; RR-0465; RR-0468; RR-0471; RR-0472; RR-0474; RR-0479; RR-0481; RR-0482; RR-0486; RR-0488; RR-0492; RR-0494; RR-0498; RR-0499; RR-0500; RR-0501; RR-0502; RR-0504; RR-0505; RR-0506; RR-0508; RR-0513; RR-0515; RR-0517; RR-0523; RR-0526; RR-0528; RR-0530; RR-0531; RR-0534; RR-0536; RR-0541; RR-0547; RR-0548; RR-0550; RR-0552; RR-0556; RR-0559; RR-0561; RR-0562; RR-0563; RR-0564; RR-0565; RR-0568; RR-0570; RR-0572; RR-0576; RR-0577; RR-0579; RR-0580; RR-0581; RR-0582; RR-0583; RR-0587; RR-0589; RR-0590; RR-0592; RR-0594; RR-0595; RR-0598; RR-0599; RR-0603; RR-0605; RR-0611; RR-0618; RR-0619; RR-0623; RR-0624; RR-0625; RR-0627; RR-0628; RR-0629; RR-0630; RR-0632; RR-0633; RR-0639; RR-0640; RR-0641; RR-0643; RR-0644; RR-0645; RR-0647; RR-0648; RR-0649; RR-0650; RR-0654; RR-0655; RR-0656; RR-0657; RR-0658; RR-0659; RR-0661; RR-0664; RR-0673; RR-0677; RR-0680; RR-0681; RR-0682; RR-0683; RR-0684; RR-0690; RR-0691; RR-0695; RR-0697; RR-0700; RR-0704; RR-0706; RR-0708; RR-0710; RR-0712; RR-0713; RR-0714;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0718; RR-0719; RR-0721; RR-0722; RR-0724; RR-0725; RR-0727; RR-0732; RR-0736; RR-0737; RR-0741; RR-0743; RR-0744; RR-0745; RR-0746; RR-0747; RR-0749; RR-0750; RR-0751; RR-0754; RR-0755; RR-0757; RR-0761; RR-0762; RR-0765; RR-0766; RR-0772; RR-0773; RR-0775; RR-0776; RR-0784; RR-0786; RR-0802; RR-0803; RR-0804; RR-0805; RR-0809; RR-0811; RR-0814; RR-0818; RR-0820; RR-0821; RR-0827; RR-0828; RR-0829; RR-0830; RR-0833; RR-0834; RR-0835; RR-0836; RR-0837; RR-0839; RR-0840; RR-0841; RR-0844; RR-0845; RR-0847; RR-0849; RR-0850; RR-0852; RR-0854; RR-0855; RR-0856; RR-0862; RR-0866; RR-0869; RR-0871; RR-0873; RR-0877; RR-0878; RR-0880; RR-0881; RR-0883; RR-0885; RR-0886; RR-0887; RR-0891; RR-0893; RR-0894; RR-0897; RR-0898; RR-0899; RR-0901; RR-0902; RR-0903; RR-0904; RR-0905; RR-0909; RR-0910; RR-0911; RR-0913; RR-0914; RR-0915; RR-0918; RR-0920; RR-0921; RR-0926; RR-0930; RR-0931; RR-0932; RR-0933; RR-0934; RR-0936; RR-0937; RR-0938; RR-0939; RR-0940; RR-0941; RR-0944; RR-0945; RR-0947; RR-0948; RR-0951; RR-0952; RR-0954; RR-0957; RR-0958; RR-0960; RR-0961; RR-0966; RR-0967; RR-0969; RR-0972; RR-0973; RR-0974; RR-0976; RR-0978; RR-0979; RR-0981; RR-0982; RR-0985; RR-0987; RR-0991; RR-0993; RR-0994; RR-0995; RR-0997; RR-0998; RR-0999; RR-1001; RR-1002; RR-1004; RR-1005; RR-1006; RR-1007; RR-1008; RR-1013; RR-1015; RR-1017; RR-1018; RR-1019; RR-1022; RR-1024; RR-1025; RR-1026; RR-1027; RR-1032; RR-1033; RR-1034; RR-1038; RR-1041; RR-1042; RR-1044; RR-1047; RR-1049; RR-1050; RR-1056; RR-1057; RR-1059; RR-1060; RR-1063; RR-1066; RR-1073; RR-1074; RR-1078; RR-1079; RR-1082; RR-1083; RR-1085; RR-1089; RR-1091; RR-1092; RR-1097; RR-1099; RR-1100; RR-1102; RR-1111; RR-1112; RR-1114; RR-1116; RR-1117; RR-1119; RR-1121; RR-1122; RR-1124; RR-1126; RR-1129; RR-1131; RR-1132; RR-1134; RR-1135; RR-1136; RR-1138; RR-1139; RR-1140; RR-1149; RR-1153; RR-1155; RR-1157; RR-1161; RR-1162; RR-1163; RR-1171; RR-1174; RR-1177; RR-1179; RR-1180; RR-1181; RR-1182; RR-1185; RR-1194; RR-1197; RR-1203; RR-1204; RR-1206; RR-1207; RR-1209; RR-1210; RR-1211; RR-1236; RR-1237; RR-1238
Air Quality	AIR-	RR-0040; RR-0068; RR-0079; RR-0107; RR-0204; RR-0234; RR-0285; RR-0301; RR-0367; RR-0388; RR-0389; RR-0429; RR-0497; RR-0520; RR-0548; RR-0603; RR-0679; RR-0684; RR-0690; RR-0738; RR-0799; RR-0802; RR-0829; RR-0841; RR-0852; RR-0856; RR-0869; RR-0886; RR-0891; RR-0963; RR-1023; RR-1046; RR-1149
Alternatives and Design Evolution	ALT-	RR-0004; RR-0009; RR-0027; RR-0030; RR-0031; RR-0033; RR-0038; RR-0042; RR-0044; RR-0050; RR-0055; RR-0056; RR-0059; RR-0060; RR-0061; RR-0064; RR-0071; RR-0072; RR-0076; RR-0078; RR-0082; RR-0083; RR-0085; RR-0092; RR-0095; RR-0101; RR-0103; RR-0104; RR-0113; RR-0114; RR-0116; RR-0120; RR-0121; RR-0126; RR-0127; RR-0128; RR-0135; RR-0137; RR-0138; RR-0140;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0142; RR-0143; RR-0144; RR-0146; RR-0147; RR-0149; RR-0150; RR-0152; RR-0156; RR-0159; RR-0160; RR-0163; RR-0169; RR-0171; RR-0172; RR-0176; RR-0177; RR-0182; RR-0184; RR-0188; RR-0189; RR-0193; RR-0197; RR-0199; RR-0201; RR-0204; RR-0208; RR-0209; RR-0210; RR-0214; RR-0215; RR-0216; RR-0218; RR-0220; RR-0221; RR-0222; RR-0223; RR-0224; RR-0225; RR-0230; RR-0233; RR-0235; RR-0236; RR-0237; RR-0238; RR-0239; RR-0241; RR-0242; RR-0243; RR-0244; RR-0246; RR-0247; RR-0250; RR-0251; RR-0255; RR-0256; RR-0261; RR-0262; RR-0266; RR-0271; RR-0272; RR-0273; RR-0275; RR-0278; RR-0279; RR-0280; RR-0283; RR-0285; RR-0286; RR-0288; RR-0290; RR-0291; RR-0292; RR-0299; RR-0303; RR-0305; RR-0308; RR-0309; RR-0314; RR-0316; RR-0317; RR-0318; RR-0321; RR-0322; RR-0334; RR-0336; RR-0337; RR-0338; RR-0341; RR-0345; RR-0348; RR-0349; RR-0350; RR-0352; RR-0353; RR-0355; RR-0356; RR-0357; RR-0358; RR-0364; RR-0365; RR-0367; RR-0368; RR-0370; RR-0372; RR-0376; RR-0380; RR-0384; RR-0386; RR-0387; RR-0388; RR-0389; RR-0391; RR-0393; RR-0394; RR-0396; RR-0399; RR-0401; RR-0402; RR-0406; RR-0407; RR-0408; RR-0409; RR-0411; RR-0418; RR-0419; RR-0421; RR-0422; RR-0423; RR-0424; RR-0430; RR-0435; RR-0438; RR-0440; RR-0443; RR-0445; RR-0446; RR-0447; RR-0449; RR-0454; RR-0456; RR-0458; RR-0459; RR-0461; RR-0462; RR-0464; RR-0465; RR-0471; RR-0472; RR-0473; RR-0475; RR-0479; RR-0480; RR-0481; RR-0483; RR-0484; RR-0485; RR-0486; RR-0487; RR-0488; RR-0492; RR-0494; RR-0496; RR-0500; RR-0501; RR-0502; RR-0504; RR-0508; RR-0509; RR-0511; RR-0513; RR-0514; RR-0516; RR-0519; RR-0520; RR-0530; RR-0531; RR-0534; RR-0537; RR-0539; RR-0541; RR-0542; RR-0544; RR-0547; RR-0549; RR-0551; RR-0552; RR-0553; RR-0557; RR-0563; RR-0566; RR-0568; RR-0570; RR-0571; RR-0573; RR-0575; RR-0576; RR-0577; RR-0578; RR-0579; RR-0580; RR-0582; RR-0584; RR-0588; RR-0593; RR-0595; RR-0596; RR-0598; RR-0599; RR-0605; RR-0606; RR-0610; RR-0611; RR-0612; RR-0618; RR-0619; RR-0624; RR-0629; RR-0630; RR-0632; RR-0633; RR-0635; RR-0638; RR-0639; RR-0640; RR-0643; RR-0649; RR-0650; RR-0655; RR-0658; RR-0660; RR-0661; RR-0662; RR-0663; RR-0664; RR-0667; RR-0668; RR-0669; RR-0670; RR-0673; RR-0676; RR-0677; RR-0678; RR-0680; RR-0681; RR-0683; RR-0688; RR-0689; RR-0690; RR-0691; RR-0695; RR-0697; RR-0698; RR-0701; RR-0703; RR-0704; RR-0705; RR-0711; RR-0713; RR-0714; RR-0717; RR-0718; RR-0719; RR-0721; RR-0722; RR-0725; RR-0727; RR-0729; RR-0733; RR-0734; RR-0737; RR-0739; RR-0741; RR-0743; RR-0744; RR-0747; RR-0748; RR-0749; RR-0750; RR-0751; RR-0752; RR-0754; RR-0757; RR-0758; RR-0763; RR-0764; RR-0767; RR-0771; RR-0772; RR-0784; RR-0785; RR-0789; RR-0790; RR-0793; RR-0794; RR-0795; RR-0798; RR-0799; RR-0801; RR-0802; RR-0803; RR-0804; RR-0805; RR-0806; RR-0807; RR-0809; RR-0810; RR-0814; RR-0816; RR-0817; RR-0818; RR-0819; RR-0822; RR-0824; RR-0827; RR-0828; RR-0830; RR-0832; RR-0833; RR-0836; RR-0837; RR-0841; RR-0844; RR-0847; RR-0849; RR-0850; RR-0855; RR-0856; RR-0860; RR-0862;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0869; RR-0871; RR-0873; RR-0878; RR-0879; RR-0880; RR-0883; RR-0885; RR-0888; RR-0890; RR-0891; RR-0893; RR-0897; RR-0899; RR-0901; RR-0902; RR-0903; RR-0912; RR-0914; RR-0917; RR-0921; RR-0922; RR-0923; RR-0926; RR-0935; RR-0938; RR-0940; RR-0941; RR-0949; RR-0951; RR-0952; RR-0954; RR-0956; RR-0957; RR-0958; RR-0960; RR-0961; RR-0968; RR-0969; RR-0970; RR-0973; RR-0975; RR-0976; RR-0979; RR-0980; RR-0981; RR-0982; RR-0984; RR-0985; RR-0988; RR-0989; RR-0994; RR-0996; RR-0998; RR-0999; RR-1000; RR-1005; RR-1006; RR-1007; RR-1016; RR-1018; RR-1024; RR-1026; RR-1027; RR-1031; RR-1041; RR-1043; RR-1044; RR-1045; RR-1049; RR-1050; RR-1052; RR-1056; RR-1057; RR-1063; RR-1070; RR-1072; RR-1075; RR-1077; RR-1079; RR-1085; RR-1086; RR-1088; RR-1092; RR-1094; RR-1097; RR-1105; RR-1113; RR-1114; RR-1116; RR-1120; RR-1122; RR-1123; RR-1124; RR-1130; RR-1131; RR-1133; RR-1136; RR-1137; RR-1139; RR-1140; RR-1147; RR-1149; RR-1150; RR-1151; RR-1158; RR-1159; RR-1160; RR-1163; RR-1167; RR-1172; RR-1176; RR-1177; RR-1181; RR-1182; RR-1184; RR-1185; RR-1188; RR-1190; RR-1191; RR-1195; RR-1197; RR-1201; RR-1202; RR-1209; RR-1210; RR-1235; RR-1236
Arboriculture	ARB-	RR-0812
Climate Change	CLI-	RR-0012; RR-0057; RR-0060; RR-0063; RR-0193; RR-0227; RR-0230; RR-0241; RR-0255; RR-0283; RR-0303; RR-0310; RR-0337; RR-0350; RR-0368; RR-0419; RR-0435; RR-0442; RR-0453; RR-0505; RR-0511; RR-0534; RR-0565; RR-0584; RR-0611; RR-0643; RR-0720; RR-0771; RR-0809; RR-0810; RR-0824; RR-0827; RR-0831; RR-0833; RR-0847; RR-0849; RR-0867; RR-0881; RR-0884; RR-0958; RR-0967; RR-0980; RR-1032; RR-1101; RR-1104; RR-1184; RR-1210
Community Benefits	CBF-	RR-0001; RR-0005; RR-0030; RR-0095; RR-0105; RR-0115; RR-0137; RR-0139; RR-0162; RR-0173; RR-0175; RR-0211; RR-0212; RR-0217; RR-0219; RR-0227; RR-0255; RR-0266; RR-0271; RR-0295; RR-0307; RR-0308; RR-0324; RR-0334; RR-0340; RR-0349; RR-0368; RR-0391; RR-0464; RR-0465; RR-0476; RR-0486; RR-0493; RR-0505; RR-0520; RR-0525; RR-0535; RR-0540; RR-0541; RR-0553; RR-0554; RR-0571; RR-0575; RR-0577; RR-0666; RR-0700; RR-0710; RR-0731; RR-0732; RR-0740; RR-0828; RR-0849; RR-0857; RR-0884; RR-0897; RR-0958; RR-1007; RR-1011; RR-1027; RR-1051; RR-1092; RR-1157; RR-1186; RR-1196; RR-1212
Compulsory Acquisition	CAC-	RR-0399; RR-0883
Consent Order	DCO-	RR-0227; RR-0298; RR-0373; RR-0598; RR-0785; RR-0806; RR-0844; RR-0849; RR-0850; RR-0856; RR-0891; RR-0899; RR-0969; RR-1104; RR-1149



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
Consultation	CON-	RR-0001; RR-0031; RR-0062; RR-0266; RR-0271; RR-0357; RR-0365; RR-0368; RR-0391; RR-0409; RR-0433; RR-0462; RR-0472; RR-0483; RR-0496; RR-0520; RR-0595; RR-0598; RR-0625; RR-0651; RR-0669; RR-0700; RR-0710; RR-0713; RR-0714; RR-0731; RR-0760; RR-0806; RR-0808; RR-0811; RR-0820; RR-0844; RR-0856; RR-0873; RR-0883; RR-0885; RR-0899; RR-0908; RR-0944; RR-0952; RR-0958; RR-0969; RR-0973; RR-0974; RR-0990; RR-1001; RR-1011; RR-1015; RR-1041; RR-1042; RR-1062; RR-1063; RR-1096; RR-1138; RR-1162; RR-1181; RR-1211
Cultural Heritage	CUL-	RR-0030; RR-0031; RR-0094; RR-0109; RR-0120; RR-0127; RR-0140; RR-0155; RR-0162; RR-0168; RR-0185; RR-0187; RR-0215; RR-0217; RR-0223; RR-0225; RR-0235; RR-0253; RR-0266; RR-0276; RR-0290; RR-0298; RR-0305; RR-0307; RR-0317; RR-0322; RR-0344; RR-0349; RR-0355; RR-0367; RR-0368; RR-0391; RR-0393; RR-0414; RR-0424; RR-0431; RR-0445; RR-0446; RR-0472; RR-0482; RR-0484; RR-0497; RR-0553; RR-0576; RR-0577; RR-0580; RR-0587; RR-0590; RR-0618; RR-0673; RR-0679; RR-0694; RR-0700; RR-0710; RR-0714; RR-0730; RR-0731; RR-0757; RR-0771; RR-0800; RR-0801; RR-0802; RR-0813; RR-0820; RR-0828; RR-0829; RR-0844; RR-0850; RR-0855; RR-0856; RR-0864; RR-0873; RR-0886; RR-0891; RR-0898; RR-0908; RR-0926; RR-0944; RR-0949; RR-0952; RR-0958; RR-0961; RR-0969; RR-0974; RR-1017; RR-1123; RR-1160; RR-1166; RR-1192; RR-1193; RR-1194; RR-1196; RR-1204; RR-1212
Ecology and Biodiversity	ECO-	RR-0002; RR-0003; RR-0004; RR-0005; RR-0006; RR-0007; RR-0009; RR-0013; RR-0014; RR-0021; RR-0024; RR-0031; RR-0034; RR-0035; RR-0039; RR-0043; RR-0046; RR-0048; RR-0066; RR-0068; RR-0069; RR-0073; RR-0077; RR-0078; RR-0079; RR-0085; RR-0086; RR-0093; RR-0097; RR-0107; RR-0111; RR-0117; RR-0124; RR-0125; RR-0128; RR-0133; RR-0137; RR-0140; RR-0141; RR-0142; RR-0144; RR-0148; RR-0150; RR-0151; RR-0153; RR-0163; RR-0168; RR-0169; RR-0172; RR-0173; RR-0175; RR-0176; RR-0177; RR-0186; RR-0189; RR-0192; RR-0193; RR-0203; RR-0212; RR-0214; RR-0215; RR-0219; RR-0223; RR-0224; RR-0227; RR-0230; RR-0236; RR-0244; RR-0253; RR-0259; RR-0260; RR-0263; RR-0269; RR-0278; RR-0279; RR-0282; RR-0283; RR-0285; RR-0290; RR-0294; RR-0297; RR-0298; RR-0299; RR-0301; RR-0303; RR-0304; RR-0306; RR-0307; RR-0311; RR-0315; RR-0316; RR-0317; RR-0323; RR-0334; RR-0338; RR-0339; RR-0344; RR-0349; RR-0351; RR-0355; RR-0362; RR-0371; RR-0373; RR-0374; RR-0375; RR-0380; RR-0381; RR-0382; RR-0386; RR-0389; RR-0391; RR-0393; RR-0400; RR-0404; RR-0409; RR-0412; RR-0418; RR-0419; RR-0421; RR-0424; RR-0427; RR-0428; RR-0429; RR-0433; RR-0435; RR-0436; RR-0437; RR-0439; RR-0440; RR-0441; RR-0445; RR-0449; RR-0451; RR-0456; RR-0458; RR-0460; RR-0462; RR-0464; RR-0465; RR-0466; RR-0468; RR-0472; RR-0474; RR-0475; RR-0476; RR-0480; RR-0482; RR-0485; RR-0487; RR-0489; RR-0492; RR-0493; RR-0497; RR-0505; RR-0507; RR-0508; RR-0509; RR-0511; RR-0523; RR-0524;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0529; RR-0534; RR-0535; RR-0536; RR-0537; RR-0539; RR-0542; RR-0543; RR-0545; RR-0552; RR-0553; RR-0557; RR-0559; RR-0563; RR-0569; RR-0572; RR-0576; RR-0579; RR-0581; RR-0586; RR-0592; RR-0594; RR-0595; RR-0596; RR-0597; RR-0598; RR-0599; RR-0604; RR-0613; RR-0617; RR-0618; RR-0629; RR-0630; RR-0643; RR-0644; RR-0645; RR-0646; RR-0650; RR-0651; RR-0653; RR-0662; RR-0666; RR-0668; RR-0671; RR-0674; RR-0675; RR-0681; RR-0687; RR-0689; RR-0690; RR-0694; RR-0695; RR-0699; RR-0701; RR-0706; RR-0709; RR-0713; RR-0714; RR-0716; RR-0717; RR-0721; RR-0723; RR-0734; RR-0735; RR-0740; RR-0741; RR-0743; RR-0749; RR-0750; RR-0755; RR-0757; RR-0761; RR-0762; RR-0765; RR-0766; RR-0767; RR-0769; RR-0771; RR-0772; RR-0783; RR-0786; RR-0787; RR-0788; RR-0791; RR-0798; RR-0802; RR-0803; RR-0804; RR-0806; RR-0808; RR-0809; RR-0812; RR-0813; RR-0814; RR-0817; RR-0819; RR-0820; RR-0827; RR-0828; RR-0829; RR-0831; RR-0834; RR-0839; RR-0841; RR-0843; RR-0847; RR-0849; RR-0850; RR-0851; RR-0856; RR-0858; RR-0869; RR-0871; RR-0873; RR-0875; RR-0881; RR-0883; RR-0886; RR-0887; RR-0891; RR-0898; RR-0899; RR-0906; RR-0912; RR-0913; RR-0915; RR-0921; RR-0922; RR-0925; RR-0926; RR-0927; RR-0928; RR-0929; RR-0931; RR-0933; RR-0940; RR-0941; RR-0944; RR-0945; RR-0947; RR-0949; RR-0952; RR-0954; RR-0955; RR-0957; RR-0958; RR-0961; RR-0962; RR-0965; RR-0966; RR-0969; RR-0971; RR-0974; RR-0977; RR-0978; RR-0979; RR-0981; RR-0982; RR-0983; RR-0987; RR-0989; RR-0991; RR-0996; RR-0998; RR-1003; RR-1006; RR-1008; RR-1009; RR-1025; RR-1026; RR-1027; RR-1029; RR-1031; RR-1033; RR-1034; RR-1046; RR-1047; RR-1048; RR-1049; RR-1052; RR-1057; RR-1058; RR-1063; RR-1064; RR-1066; RR-1067; RR-1068; RR-1072; RR-1077; RR-1080; RR-1081; RR-1090; RR-1092; RR-1097; RR-1099; RR-1100; RR-1101; RR-1104; RR-1107; RR-1108; RR-1114; RR-1120; RR-1129; RR-1132; RR-1134; RR-1138; RR-1143; RR-1148; RR-1149; RR-1152; RR-1157; RR-1160; RR-1164; RR-1178; RR-1179; RR-1181; RR-1182; RR-1193; RR-1203; RR-1204; RR-1206; RR-1207; RR-1208; RR-1210; RR-1237
Electromagnetic Fields	EMF-	RR-0031; RR-0163; RR-0351; RR-0371; RR-0393; RR-0592; RR-0619; RR-0755; RR-0802; RR-0817; RR-0876; RR-0883; RR-0942; RR-1041; RR-1045; RR-1073; RR-1106; RR-1138; RR-1204
Energy Need and Policy	ENE-	RR-0011; RR-0030; RR-0050; RR-0108; RR-0148; RR-0184; RR-0193; RR-0202; RR-0208; RR-0210; RR-0217; RR-0218; RR-0219; RR-0227; RR-0230; RR-0236; RR-0238; RR-0247; RR-0250; RR-0261; RR-0278; RR-0282; RR-0289; RR-0290; RR-0294; RR-0295; RR-0298; RR-0305; RR-0313; RR-0317; RR-0324; RR-0349; RR-0371; RR-0380; RR-0389; RR-0391; RR-0401; RR-0408; RR-0409; RR-0416; RR-0420; RR-0421; RR-0422; RR-0430; RR-0445; RR-0446; RR-0454; RR-0464; RR-0473; RR-0494; RR-0506; RR-0520; RR-0524; RR-0534; RR-0577; RR-0578; RR-0589; RR-0596; RR-0597; RR-0603; RR-0619; RR-0626; RR-0629; RR-0633; RR-0643; RR-0686; RR-0688; RR-0692; RR-0694; RR-0706;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0733; RR-0734; RR-0749; RR-0752; RR-0755; RR-0758; RR-0767; RR-0769; RR-0794; RR-0803; RR-0818; RR-0820; RR-0829; RR-0830; RR-0844; RR-0845; RR-0847; RR-0850; RR-0872; RR-0878; RR-0883; RR-0891; RR-0896; RR-0899; RR-0907; RR-0915; RR-0935; RR-0943; RR-0958; RR-0990; RR-0994; RR-1063; RR-1069; RR-1075; RR-1077; RR-1083; RR-1091; RR-1092; RR-1106; RR-1137; RR-1144; RR-1152; RR-1153; RR-1156; RR-1157; RR-1163; RR-1168
General Matters	GEN-	RR-0010; RR-0012; RR-0016; RR-0022; RR-0028; RR-0030; RR-0032; RR-0034; RR-0041; RR-0047; RR-0048; RR-0050; RR-0054; RR-0064; RR-0067; RR-0081; RR-0087; RR-0098; RR-0099; RR-0114; RR-0131; RR-0132; RR-0135; RR-0136; RR-0137; RR-0139; RR-0143; RR-0149; RR-0151; RR-0152; RR-0156; RR-0157; RR-0158; RR-0163; RR-0165; RR-0167; RR-0168; RR-0169; RR-0170; RR-0171; RR-0172; RR-0173; RR-0176; RR-0177; RR-0179; RR-0187; RR-0191; RR-0192; RR-0193; RR-0194; RR-0195; RR-0196; RR-0198; RR-0199; RR-0200; RR-0201; RR-0204; RR-0205; RR-0206; RR-0208; RR-0210; RR-0217; RR-0218; RR-0219; RR-0230; RR-0236; RR-0244; RR-0247; RR-0251; RR-0255; RR-0257; RR-0261; RR-0266; RR-0271; RR-0272; RR-0275; RR-0276; RR-0278; RR-0279; RR-0283; RR-0288; RR-0291; RR-0297; RR-0298; RR-0300; RR-0302; RR-0303; RR-0305; RR-0307; RR-0310; RR-0315; RR-0321; RR-0323; RR-0327; RR-0343; RR-0344; RR-0345; RR-0348; RR-0349; RR-0350; RR-0351; RR-0352; RR-0353; RR-0354; RR-0355; RR-0364; RR-0365; RR-0367; RR-0368; RR-0372; RR-0376; RR-0387; RR-0388; RR-0389; RR-0390; RR-0391; RR-0404; RR-0406; RR-0408; RR-0409; RR-0410; RR-0411; RR-0412; RR-0413; RR-0415; RR-0416; RR-0417; RR-0418; RR-0419; RR-0420; RR-0421; RR-0422; RR-0423; RR-0424; RR-0425; RR-0426; RR-0427; RR-0428; RR-0429; RR-0430; RR-0431; RR-0432; RR-0433; RR-0434; RR-0435; RR-0436; RR-0437; RR-0438; RR-0439; RR-0440; RR-0441; RR-0442; RR-0444; RR-0445; RR-0446; RR-0447; RR-0449; RR-0450; RR-0451; RR-0453; RR-0454; RR-0455; RR-0456; RR-0457; RR-0459; RR-0460; RR-0461; RR-0462; RR-0463; RR-0464; RR-0465; RR-0466; RR-0467; RR-0468; RR-0469; RR-0470; RR-0471; RR-0472; RR-0473; RR-0474; RR-0476; RR-0477; RR-0478; RR-0479; RR-0480; RR-0481; RR-0482; RR-0483; RR-0484; RR-0485; RR-0486; RR-0487; RR-0488; RR-0489; RR-0491; RR-0492; RR-0493; RR-0494; RR-0495; RR-0496; RR-0497; RR-0498; RR-0499; RR-0500; RR-0501; RR-0502; RR-0503; RR-0504; RR-0505; RR-0507; RR-0508; RR-0509; RR-0510; RR-0511; RR-0512; RR-0513; RR-0514; RR-0515; RR-0516; RR-0517; RR-0518; RR-0519; RR-0520; RR-0521; RR-0522; RR-0523; RR-0524; RR-0525; RR-0526; RR-0527; RR-0528; RR-0529; RR-0530; RR-0531; RR-0532; RR-0533; RR-0534; RR-0535; RR-0536; RR-0537; RR-0538; RR-0539; RR-0540; RR-0541; RR-0542; RR-0543; RR-0544; RR-0545; RR-0546; RR-0547; RR-0548; RR-0549; RR-0551; RR-0552; RR-0553; RR-0554; RR-0555; RR-0556; RR-0557; RR-0558; RR-0559; RR-0561; RR-0562; RR-0563; RR-0564; RR-0565; RR-0566; RR-0567; RR-0568; RR-0569; RR-0571; RR-0572; RR-0573; RR-0575; RR-0576; RR-0577; RR-0578; RR-0579; RR-0581; RR-0582;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0583; RR-0584; RR-0585; RR-0586; RR-0587; RR-0588; RR-0589; RR-0591; RR-0592; RR-0593; RR-0594; RR-0595; RR-0596; RR-0597; RR-0598; RR-0599; RR-0600; RR-0601; RR-0602; RR-0603; RR-0604; RR-0605; RR-0606; RR-0607; RR-0608; RR-0609; RR-0610; RR-0611; RR-0612; RR-0613; RR-0614; RR-0615; RR-0616; RR-0618; RR-0619; RR-0620; RR-0621; RR-0622; RR-0623; RR-0624; RR-0625; RR-0626; RR-0627; RR-0628; RR-0629; RR-0630; RR-0631; RR-0632; RR-0633; RR-0634; RR-0635; RR-0636; RR-0637; RR-0638; RR-0639; RR-0640; RR-0643; RR-0644; RR-0645; RR-0647; RR-0648; RR-0649; RR-0650; RR-0651; RR-0652; RR-0653; RR-0654; RR-0655; RR-0656; RR-0657; RR-0658; RR-0659; RR-0660; RR-0661; RR-0662; RR-0663; RR-0664; RR-0665; RR-0666; RR-0667; RR-0668; RR-0669; RR-0670; RR-0671; RR-0672; RR-0673; RR-0676; RR-0677; RR-0678; RR-0679; RR-0680; RR-0681; RR-0682; RR-0683; RR-0684; RR-0685; RR-0687; RR-0688; RR-0689; RR-0690; RR-0691; RR-0692; RR-0693; RR-0694; RR-0695; RR-0696; RR-0697; RR-0698; RR-0699; RR-0700; RR-0701; RR-0702; RR-0703; RR-0704; RR-0705; RR-0706; RR-0707; RR-0708; RR-0710; RR-0711; RR-0712; RR-0713; RR-0714; RR-0715; RR-0716; RR-0717; RR-0718; RR-0719; RR-0720; RR-0721; RR-0722; RR-0723; RR-0724; RR-0725; RR-0726; RR-0727; RR-0728; RR-0729; RR-0730; RR-0731; RR-0732; RR-0733; RR-0734; RR-0735; RR-0736; RR-0737; RR-0738; RR-0739; RR-0740; RR-0741; RR-0742; RR-0743; RR-0744; RR-0745; RR-0746; RR-0747; RR-0748; RR-0749; RR-0750; RR-0751; RR-0752; RR-0753; RR-0754; RR-0755; RR-0756; RR-0757; RR-0758; RR-0759; RR-0760; RR-0761; RR-0763; RR-0764; RR-0765; RR-0766; RR-0767; RR-0769; RR-0770; RR-0771; RR-0772; RR-0773; RR-0774; RR-0775; RR-0776; RR-0777; RR-0778; RR-0779; RR-0780; RR-0781; RR-0783; RR-0784; RR-0785; RR-0786; RR-0787; RR-0788; RR-0789; RR-0790; RR-0791; RR-0793; RR-0794; RR-0795; RR-0797; RR-0798; RR-0799; RR-0800; RR-0801; RR-0802; RR-0803; RR-0804; RR-0805; RR-0806; RR-0807; RR-0808; RR-0809; RR-0810; RR-0811; RR-0812; RR-0813; RR-0814; RR-0815; RR-0817; RR-0818; RR-0819; RR-0820; RR-0821; RR-0822; RR-0823; RR-0824; RR-0826; RR-0827; RR-0828; RR-0829; RR-0831; RR-0832; RR-0833; RR-0834; RR-0836; RR-0837; RR-0838; RR-0839; RR-0840; RR-0841; RR-0842; RR-0843; RR-0844; RR-0845; RR-0846; RR-0847; RR-0848; RR-0849; RR-0850; RR-0852; RR-0853; RR-0854; RR-0855; RR-0856; RR-0857; RR-0858; RR-0859; RR-0860; RR-0861; RR-0862; RR-0863; RR-0864; RR-0865; RR-0866; RR-0867; RR-0868; RR-0869; RR-0870; RR-0871; RR-0872; RR-0874; RR-0876; RR-0878; RR-0882; RR-0883; RR-0885; RR-0888; RR-0889; RR-0890; RR-0891; RR-0892; RR-0893; RR-0894; RR-0896; RR-0897; RR-0898; RR-0899; RR-0900; RR-0901; RR-0902; RR-0903; RR-0904; RR-0905; RR-0907; RR-0908; RR-0909; RR-0910; RR-0911; RR-0913; RR-0916; RR-0917; RR-0918; RR-0919; RR-0920; RR-0921; RR-0923; RR-0924; RR-0925; RR-0929; RR-0933; RR-0934; RR-0935; RR-0936; RR-0937; RR-0938; RR-0939; RR-0940; RR-0941; RR-0942; RR-0943; RR-0944; RR-0946; RR-0947; RR-0948; RR-0949; RR-0950; RR-0951; RR-0952; RR-0956;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0958; RR-0959; RR-0960; RR-0961; RR-0963; RR-0964; RR-0966; RR-0967; RR-0968; RR-0969; RR-0970; RR-0972; RR-0973; RR-0974; RR-0975; RR-0976; RR-0977; RR-0979; RR-0980; RR-0984; RR-0987; RR-0988; RR-0989; RR-0990; RR-0991; RR-0992; RR-0993; RR-0995; RR-0997; RR-0999; RR-1000; RR-1001; RR-1002; RR-1004; RR-1005; RR-1006; RR-1009; RR-1010; RR-1012; RR-1013; RR-1014; RR-1015; RR-1016; RR-1018; RR-1019; RR-1020; RR-1021; RR-1022; RR-1023; RR-1024; RR-1027; RR-1028; RR-1030; RR-1031; RR-1032; RR-1035; RR-1036; RR-1039; RR-1040; RR-1041; RR-1042; RR-1043; RR-1044; RR-1045; RR-1047; RR-1048; RR-1049; RR-1053; RR-1054; RR-1056; RR-1062; RR-1063; RR-1067; RR-1070; RR-1071; RR-1072; RR-1074; RR-1075; RR-1076; RR-1077; RR-1079; RR-1083; RR-1084; RR-1085; RR-1086; RR-1087; RR-1088; RR-1089; RR-1090; RR-1091; RR-1092; RR-1093; RR-1094; RR-1095; RR-1096; RR-1097; RR-1098; RR-1099; RR-1100; RR-1101; RR-1102; RR-1103; RR-1104; RR-1105; RR-1106; RR-1110; RR-1111; RR-1112; RR-1113; RR-1114; RR-1115; RR-1116; RR-1117; RR-1118; RR-1119; RR-1121; RR-1123; RR-1124; RR-1125; RR-1126; RR-1127; RR-1128; RR-1131; RR-1133; RR-1135; RR-1136; RR-1137; RR-1138; RR-1139; RR-1140; RR-1142; RR-1143; RR-1144; RR-1145; RR-1147; RR-1148; RR-1150; RR-1151; RR-1153; RR-1154; RR-1155; RR-1156; RR-1157; RR-1158; RR-1159; RR-1160; RR-1161; RR-1162; RR-1163; RR-1165; RR-1167; RR-1168; RR-1169; RR-1171; RR-1172; RR-1173; RR-1175; RR-1176; RR-1177; RR-1180; RR-1181; RR-1183; RR-1184; RR-1185; RR-1187; RR-1188; RR-1189; RR-1190; RR-1191; RR-1192; RR-1193; RR-1194; RR-1195; RR-1196; RR-1201; RR-1202; RR-1203; RR-1212; RR-1215; RR-1235
Glint and Glare	GLI-	RR-0003; RR-0031; RR-0043; RR-0055; RR-0066; RR-0120; RR-0169; RR-0173; RR-0188; RR-0193; RR-0204; RR-0218; RR-0253; RR-0254; RR-0263; RR-0266; RR-0285; RR-0311; RR-0327; RR-0334; RR-0412; RR-0424; RR-0462; RR-0480; RR-0497; RR-0501; RR-0536; RR-0543; RR-0572; RR-0618; RR-0626; RR-0648; RR-0699; RR-0700; RR-0705; RR-0718; RR-0731; RR-0761; RR-0802; RR-0812; RR-0817; RR-0820; RR-0847; RR-0886; RR-0891; RR-0938; RR-0944; RR-0958; RR-0966; RR-0969; RR-0973; RR-0974; RR-0979; RR-0987; RR-1045; RR-1160; RR-1162; RR-1172; RR-1173; RR-1182; RR-1197; RR-1203; RR-1204
Ground Conditions	GRO-	RR-0090; RR-0424; RR-0828; RR-0841
Human Health	HUM-	RR-0004; RR-0031; RR-0054; RR-0057; RR-0063; RR-0073; RR-0074; RR-0104; RR-0119; RR-0159; RR-0161; RR-0171; RR-0173; RR-0187; RR-0193; RR-0198; RR-0209; RR-0210; RR-0212; RR-0213; RR-0216; RR-0217; RR-0218; RR-0219; RR-0220; RR-0221; RR-0222; RR-0223; RR-0230; RR-0242; RR-0244; RR-0247; RR-0258; RR-0270; RR-0272; RR-0282; RR-0284; RR-0294; RR-0297; RR-0305; RR-0306; RR-0309; RR-0310; RR-0315; RR-0316; RR-0317; RR-0322; RR-0323; RR-0324; RR-0326; RR-0327; RR-0342; RR-0345; RR-0349; RR-0354; RR-0359; RR-0372; RR-0388; RR-0389; RR-0393;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0406; RR-0411; RR-0416; RR-0418; RR-0422; RR-0424; RR-0435; RR-0440; RR-0449; RR-0455; RR-0462; RR-0464; RR-0477; RR-0478; RR-0501; RR-0503; RR-0504; RR-0509; RR-0510; RR-0512; RR-0531; RR-0544; RR-0556; RR-0571; RR-0582; RR-0588; RR-0643; RR-0644; RR-0659; RR-0665; RR-0671; RR-0680; RR-0694; RR-0695; RR-0705; RR-0717; RR-0721; RR-0724; RR-0731; RR-0741; RR-0766; RR-0774; RR-0801; RR-0804; RR-0806; RR-0813; RR-0817; RR-0818; RR-0824; RR-0827; RR-0835; RR-0839; RR-0843; RR-0847; RR-0856; RR-0860; RR-0864; RR-0869; RR-0871; RR-0879; RR-0881; RR-0883; RR-0884; RR-0888; RR-0899; RR-0912; RR-0923; RR-0924; RR-0927; RR-0936; RR-0938; RR-0939; RR-0940; RR-0942; RR-0958; RR-0963; RR-0969; RR-0978; RR-0979; RR-0987; RR-0990; RR-0998; RR-1000; RR-1011; RR-1026; RR-1032; RR-1033; RR-1034; RR-1047; RR-1053; RR-1054; RR-1067; RR-1072; RR-1074; RR-1080; RR-1108; RR-1121; RR-1127; RR-1169; RR-1176; RR-1182; RR-1199; RR-1210; RR-1212
Hydrology and Flood Risk	HYD-	RR-0002; RR-0005; RR-0007; RR-0008; RR-0009; RR-0014; RR-0023; RR-0030; RR-0031; RR-0032; RR-0036; RR-0037; RR-0038; RR-0039; RR-0045; RR-0046; RR-0048; RR-0049; RR-0058; RR-0061; RR-0067; RR-0069; RR-0084; RR-0085; RR-0090; RR-0093; RR-0094; RR-0096; RR-0112; RR-0120; RR-0126; RR-0129; RR-0134; RR-0138; RR-0139; RR-0140; RR-0146; RR-0153; RR-0154; RR-0167; RR-0168; RR-0171; RR-0191; RR-0192; RR-0193; RR-0195; RR-0201; RR-0202; RR-0203; RR-0217; RR-0219; RR-0229; RR-0230; RR-0231; RR-0236; RR-0240; RR-0242; RR-0248; RR-0249; RR-0253; RR-0255; RR-0263; RR-0270; RR-0277; RR-0281; RR-0282; RR-0285; RR-0290; RR-0292; RR-0296; RR-0297; RR-0303; RR-0305; RR-0318; RR-0322; RR-0323; RR-0324; RR-0325; RR-0329; RR-0330; RR-0337; RR-0338; RR-0339; RR-0343; RR-0347; RR-0349; RR-0355; RR-0360; RR-0362; RR-0363; RR-0364; RR-0366; RR-0368; RR-0373; RR-0374; RR-0377; RR-0379; RR-0381; RR-0385; RR-0387; RR-0389; RR-0393; RR-0397; RR-0398; RR-0400; RR-0404; RR-0424; RR-0427; RR-0432; RR-0435; RR-0439; RR-0441; RR-0449; RR-0450; RR-0451; RR-0455; RR-0463; RR-0464; RR-0466; RR-0479; RR-0480; RR-0488; RR-0489; RR-0493; RR-0497; RR-0499; RR-0503; RR-0505; RR-0506; RR-0507; RR-0508; RR-0510; RR-0511; RR-0512; RR-0513; RR-0524; RR-0527; RR-0529; RR-0530; RR-0531; RR-0533; RR-0535; RR-0537; RR-0545; RR-0557; RR-0558; RR-0562; RR-0573; RR-0585; RR-0592; RR-0598; RR-0603; RR-0604; RR-0608; RR-0613; RR-0620; RR-0621; RR-0624; RR-0625; RR-0631; RR-0634; RR-0635; RR-0636; RR-0642; RR-0645; RR-0651; RR-0653; RR-0668; RR-0672; RR-0675; RR-0694; RR-0702; RR-0705; RR-0711; RR-0712; RR-0717; RR-0720; RR-0723; RR-0733; RR-0734; RR-0736; RR-0737; RR-0740; RR-0741; RR-0743; RR-0753; RR-0755; RR-0759; RR-0761; RR-0765; RR-0782; RR-0783; RR-0787; RR-0801; RR-0802; RR-0803; RR-0809; RR-0810; RR-0812; RR-0814; RR-0817; RR-0820; RR-0828; RR-0830; RR-0839; RR-0841; RR-0842; RR-0843; RR-0844; RR-0846; RR-0847; RR-0856; RR-0858; RR-0859; RR-0869; RR-0875; RR-0879; RR-0883; RR-0886; RR-0887;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0888; RR-0891; RR-0898; RR-0900; RR-0906; RR-0911; RR-0913; RR-0914; RR-0922; RR-0926; RR-0929; RR-0939; RR-0941; RR-0948; RR-0950; RR-0953; RR-0955; RR-0958; RR-0961; RR-0962; RR-0964; RR-0965; RR-0967; RR-0971; RR-0972; RR-0973; RR-0974; RR-0977; RR-0980; RR-0989; RR-0991; RR-0998; RR-1000; RR-1008; RR-1020; RR-1027; RR-1028; RR-1029; RR-1034; RR-1043; RR-1048; RR-1058; RR-1064; RR-1067; RR-1071; RR-1074; RR-1087; RR-1105; RR-1118; RR-1120; RR-1126; RR-1128; RR-1132; RR-1134; RR-1137; RR-1145; RR-1148; RR-1153; RR-1154; RR-1157; RR-1162; RR-1176; RR-1178; RR-1180; RR-1181; RR-1189; RR-1193; RR-1195; RR-1196; RR-1199; RR-1203; RR-1209; RR-1212; RR-1235; RR-1239
Landscape and Visual Impact	LAN-	RR-0001; RR-0002; RR-0006; RR-0007; RR-0008; RR-0009; RR-0015; RR-0017; RR-0019; RR-0020; RR-0023; RR-0025; RR-0026; RR-0027; RR-0029; RR-0030; RR-0031; RR-0043; RR-0044; RR-0050; RR-0051; RR-0062; RR-0074; RR-0076; RR-0078; RR-0080; RR-0094; RR-0098; RR-0099; RR-0100; RR-0105; RR-0106; RR-0109; RR-0115; RR-0120; RR-0126; RR-0132; RR-0133; RR-0135; RR-0137; RR-0142; RR-0144; RR-0149; RR-0150; RR-0151; RR-0155; RR-0159; RR-0161; RR-0162; RR-0164; RR-0165; RR-0166; RR-0168; RR-0169; RR-0173; RR-0174; RR-0177; RR-0178; RR-0179; RR-0182; RR-0183; RR-0185; RR-0188; RR-0191; RR-0192; RR-0193; RR-0198; RR-0199; RR-0201; RR-0207; RR-0208; RR-0209; RR-0210; RR-0211; RR-0213; RR-0215; RR-0216; RR-0217; RR-0218; RR-0219; RR-0220; RR-0221; RR-0223; RR-0225; RR-0226; RR-0228; RR-0230; RR-0233; RR-0235; RR-0236; RR-0241; RR-0242; RR-0244; RR-0245; RR-0247; RR-0253; RR-0254; RR-0255; RR-0259; RR-0260; RR-0264; RR-0266; RR-0269; RR-0271; RR-0272; RR-0275; RR-0277; RR-0278; RR-0281; RR-0282; RR-0283; RR-0284; RR-0287; RR-0289; RR-0290; RR-0293; RR-0294; RR-0301; RR-0305; RR-0308; RR-0309; RR-0311; RR-0312; RR-0314; RR-0316; RR-0317; RR-0321; RR-0324; RR-0326; RR-0327; RR-0328; RR-0334; RR-0335; RR-0338; RR-0341; RR-0342; RR-0344; RR-0353; RR-0355; RR-0356; RR-0362; RR-0363; RR-0367; RR-0368; RR-0369; RR-0370; RR-0373; RR-0374; RR-0375; RR-0376; RR-0377; RR-0378; RR-0379; RR-0383; RR-0385; RR-0387; RR-0388; RR-0389; RR-0391; RR-0393; RR-0394; RR-0397; RR-0398; RR-0399; RR-0400; RR-0401; RR-0403; RR-0407; RR-0412; RR-0417; RR-0418; RR-0421; RR-0422; RR-0423; RR-0424; RR-0425; RR-0428; RR-0433; RR-0434; RR-0435; RR-0437; RR-0439; RR-0441; RR-0445; RR-0447; RR-0451; RR-0453; RR-0454; RR-0456; RR-0457; RR-0463; RR-0464; RR-0465; RR-0466; RR-0470; RR-0471; RR-0472; RR-0476; RR-0477; RR-0479; RR-0480; RR-0482; RR-0483; RR-0484; RR-0485; RR-0491; RR-0492; RR-0494; RR-0497; RR-0498; RR-0499; RR-0501; RR-0505; RR-0510; RR-0511; RR-0512; RR-0513; RR-0514; RR-0521; RR-0522; RR-0523; RR-0524; RR-0525; RR-0526; RR-0529; RR-0535; RR-0536; RR-0541; RR-0543; RR-0545; RR-0546; RR-0551; RR-0555; RR-0559; RR-0562; RR-0566; RR-0567; RR-0569; RR-0572; RR-0577; RR-0578; RR-0580; RR-0587; RR-0590; RR-0591; RR-0592; RR-0596; RR-0597; RR-0598; RR-0600;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0607; RR-0612; RR-0614; RR-0615; RR-0618; RR-0622; RR-0626; RR-0635; RR-0637; RR-0639; RR-0641; RR-0642; RR-0643; RR-0644; RR-0651; RR-0653; RR-0666; RR-0667; RR-0670; RR-0673; RR-0674; RR-0675; RR-0676; RR-0677; RR-0679; RR-0681; RR-0683; RR-0685; RR-0689; RR-0690; RR-0694; RR-0695; RR-0696; RR-0699; RR-0700; RR-0702; RR-0705; RR-0706; RR-0707; RR-0709; RR-0710; RR-0711; RR-0712; RR-0714; RR-0718; RR-0719; RR-0720; RR-0722; RR-0725; RR-0726; RR-0731; RR-0733; RR-0734; RR-0738; RR-0739; RR-0744; RR-0745; RR-0746; RR-0747; RR-0749; RR-0750; RR-0754; RR-0755; RR-0760; RR-0761; RR-0762; RR-0764; RR-0765; RR-0767; RR-0769; RR-0770; RR-0771; RR-0775; RR-0776; RR-0778; RR-0781; RR-0782; RR-0783; RR-0784; RR-0786; RR-0791; RR-0797; RR-0798; RR-0801; RR-0802; RR-0803; RR-0806; RR-0809; RR-0810; RR-0812; RR-0813; RR-0814; RR-0816; RR-0817; RR-0818; RR-0819; RR-0823; RR-0824; RR-0826; RR-0827; RR-0828; RR-0829; RR-0830; RR-0831; RR-0833; RR-0834; RR-0835; RR-0838; RR-0841; RR-0842; RR-0843; RR-0844; RR-0845; RR-0846; RR-0847; RR-0848; RR-0849; RR-0850; RR-0853; RR-0854; RR-0856; RR-0858; RR-0859; RR-0860; RR-0862; RR-0865; RR-0869; RR-0872; RR-0873; RR-0877; RR-0881; RR-0882; RR-0884; RR-0886; RR-0890; RR-0891; RR-0893; RR-0896; RR-0898; RR-0899; RR-0900; RR-0906; RR-0907; RR-0913; RR-0914; RR-0918; RR-0919; RR-0923; RR-0926; RR-0927; RR-0928; RR-0929; RR-0931; RR-0933; RR-0934; RR-0936; RR-0940; RR-0941; RR-0942; RR-0943; RR-0944; RR-0945; RR-0948; RR-0949; RR-0952; RR-0955; RR-0957; RR-0958; RR-0959; RR-0961; RR-0963; RR-0966; RR-0969; RR-0973; RR-0974; RR-0977; RR-0982; RR-0983; RR-0987; RR-0990; RR-0998; RR-1003; RR-1004; RR-1010; RR-1014; RR-1015; RR-1016; RR-1017; RR-1020; RR-1021; RR-1022; RR-1023; RR-1024; RR-1025; RR-1027; RR-1029; RR-1030; RR-1033; RR-1034; RR-1035; RR-1036; RR-1039; RR-1040; RR-1041; RR-1043; RR-1045; RR-1047; RR-1048; RR-1049; RR-1051; RR-1054; RR-1062; RR-1070; RR-1072; RR-1076; RR-1077; RR-1081; RR-1084; RR-1085; RR-1086; RR-1090; RR-1091; RR-1092; RR-1097; RR-1098; RR-1099; RR-1101; RR-1103; RR-1104; RR-1111; RR-1114; RR-1115; RR-1116; RR-1119; RR-1122; RR-1125; RR-1126; RR-1132; RR-1137; RR-1138; RR-1142; RR-1146; RR-1147; RR-1148; RR-1149; RR-1154; RR-1157; RR-1160; RR-1161; RR-1162; RR-1163; RR-1164; RR-1167; RR-1171; RR-1175; RR-1178; RR-1181; RR-1182; RR-1184; RR-1187; RR-1191; RR-1195; RR-1196; RR-1197; RR-1198; RR-1200; RR-1201; RR-1203; RR-1204; RR-1208; RR-1211; RR-1212; RR-1213; RR-1237
Major Accidents and Disasters	MAJ-	RR-0001; RR-0009; RR-0024; RR-0030; RR-0031; RR-0042; RR-0046; RR-0065; RR-0077; RR-0094; RR-0101; RR-0120; RR-0122; RR-0132; RR-0162; RR-0171; RR-0183; RR-0187; RR-0190; RR-0193; RR-0201; RR-0210; RR-0217; RR-0218; RR-0219; RR-0223; RR-0230; RR-0236; RR-0242; RR-0253; RR-0254; RR-0255; RR-0259; RR-0266; RR-0281; RR-0283; RR-0285; RR-0290; RR-0296; RR-0299; RR-0303; RR-0305; RR-0310; RR-0322; RR-0333; RR-0344; RR-0349; RR-0367; RR-0368; RR-0387;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0391; RR-0392; RR-0393; RR-0400; RR-0421; RR-0424; RR-0429; RR-0431; RR-0447; RR-0453; RR-0472; RR-0480; RR-0482; RR-0492; RR-0497; RR-0511; RR-0520; RR-0522; RR-0531; RR-0536; RR-0537; RR-0541; RR-0548; RR-0561; RR-0562; RR-0577; RR-0592; RR-0595; RR-0618; RR-0630; RR-0643; RR-0644; RR-0645; RR-0660; RR-0671; RR-0690; RR-0694; RR-0700; RR-0702; RR-0710; RR-0714; RR-0731; RR-0742; RR-0755; RR-0757; RR-0764; RR-0773; RR-0782; RR-0787; RR-0802; RR-0804; RR-0813; RR-0814; RR-0817; RR-0818; RR-0820; RR-0822; RR-0828; RR-0834; RR-0839; RR-0841; RR-0844; RR-0847; RR-0851; RR-0856; RR-0873; RR-0883; RR-0886; RR-0888; RR-0898; RR-0899; RR-0918; RR-0933; RR-0934; RR-0938; RR-0940; RR-0941; RR-0942; RR-0944; RR-0949; RR-0952; RR-0954; RR-0958; RR-0960; RR-0961; RR-0966; RR-0967; RR-0969; RR-0973; RR-0974; RR-0977; RR-0987; RR-1015; RR-1019; RR-1024; RR-1039; RR-1045; RR-1049; RR-1066; RR-1114; RR-1124; RR-1132; RR-1147; RR-1148; RR-1149; RR-1160; RR-1162; RR-1166; RR-1181; RR-1182; RR-1192; RR-1204; RR-1206
Minerals	MIN-	RR-0241
Noise and Vibration	NOI-	RR-0006; RR-0013; RR-0018; RR-0024; RR-0025; RR-0026; RR-0032; RR-0040; RR-0066; RR-0075; RR-0079; RR-0085; RR-0086; RR-0093; RR-0107; RR-0110; RR-0119; RR-0173; RR-0189; RR-0193; RR-0197; RR-0204; RR-0210; RR-0218; RR-0232; RR-0234; RR-0236; RR-0248; RR-0255; RR-0294; RR-0301; RR-0305; RR-0322; RR-0349; RR-0353; RR-0357; RR-0367; RR-0388; RR-0389; RR-0395; RR-0418; RR-0424; RR-0428; RR-0429; RR-0432; RR-0438; RR-0445; RR-0446; RR-0451; RR-0464; RR-0472; RR-0477; RR-0480; RR-0497; RR-0511; RR-0515; RR-0520; RR-0534; RR-0539; RR-0541; RR-0542; RR-0548; RR-0595; RR-0602; RR-0603; RR-0628; RR-0653; RR-0684; RR-0690; RR-0705; RR-0707; RR-0716; RR-0738; RR-0774; RR-0799; RR-0802; RR-0804; RR-0806; RR-0817; RR-0829; RR-0835; RR-0841; RR-0847; RR-0852; RR-0856; RR-0861; RR-0869; RR-0870; RR-0873; RR-0883; RR-0886; RR-0891; RR-0898; RR-0906; RR-0913; RR-0915; RR-0922; RR-0926; RR-0938; RR-0944; RR-0949; RR-0958; RR-0961; RR-0963; RR-0987; RR-1023; RR-1039; RR-1046; RR-1048; RR-1077; RR-1149; RR-1176; RR-1183; RR-1194; RR-1203
Other Environmental Matters	OEM-	RR-0146; RR-0164; RR-0187; RR-0210; RR-0266; RR-0278; RR-0285; RR-0290; RR-0323; RR-0334; RR-0418; RR-0421; RR-0481; RR-0513; RR-0531; RR-0595; RR-0643; RR-0644; RR-0650; RR-0696; RR-0698; RR-0706; RR-0748; RR-0773; RR-0824; RR-0828; RR-0841; RR-0849; RR-0850; RR-0915; RR-0953; RR-0958; RR-1009; RR-1137; RR-1149; RR-1152; RR-1181
Principle of Development	PRI-	RR-0028; RR-0031; RR-0056; RR-0123; RR-0148; RR-0149; RR-0166; RR-0193; RR-0216; RR-0219; RR-0263; RR-0285; RR-0286; RR-0287; RR-0298; RR-0317; RR-0321; RR-0323; RR-0327; RR-0334;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0340; RR-0344; RR-0349; RR-0350; RR-0352; RR-0353; RR-0357; RR-0362; RR-0365; RR-0368; RR-0375; RR-0391; RR-0393; RR-0406; RR-0409; RR-0417; RR-0418; RR-0421; RR-0423; RR-0424; RR-0445; RR-0449; RR-0461; RR-0480; RR-0483; RR-0485; RR-0515; RR-0523; RR-0537; RR-0541; RR-0576; RR-0577; RR-0582; RR-0587; RR-0588; RR-0589; RR-0597; RR-0598; RR-0605; RR-0616; RR-0619; RR-0628; RR-0643; RR-0645; RR-0647; RR-0683; RR-0690; RR-0694; RR-0721; RR-0729; RR-0731; RR-0737; RR-0740; RR-0749; RR-0755; RR-0763; RR-0772; RR-0778; RR-0779; RR-0780; RR-0785; RR-0789; RR-0795; RR-0806; RR-0809; RR-0814; RR-0820; RR-0828; RR-0829; RR-0830; RR-0841; RR-0844; RR-0847; RR-0850; RR-0860; RR-0864; RR-0874; RR-0877; RR-0884; RR-0889; RR-0891; RR-0893; RR-0898; RR-0899; RR-0913; RR-0915; RR-0922; RR-0925; RR-0941; RR-0944; RR-0958; RR-0961; RR-0973; RR-0979; RR-0985; RR-1024; RR-1039; RR-1049; RR-1050; RR-1088; RR-1096; RR-1140; RR-1141; RR-1146; RR-1149; RR-1152; RR-1157; RR-1162; RR-1166; RR-1172; RR-1181; RR-1188; RR-1196; RR-1209; RR-1212
Socio-Economics, Tourism and Recreation	SOC-	RR-0001; RR-0006; RR-0015; RR-0020; RR-0021; RR-0023; RR-0025; RR-0029; RR-0030; RR-0035; RR-0039; RR-0058; RR-0070; RR-0086; RR-0115; RR-0123; RR-0124; RR-0128; RR-0132; RR-0133; RR-0137; RR-0140; RR-0141; RR-0161; RR-0171; RR-0173; RR-0179; RR-0183; RR-0187; RR-0191; RR-0192; RR-0193; RR-0198; RR-0210; RR-0217; RR-0218; RR-0219; RR-0220; RR-0229; RR-0230; RR-0235; RR-0236; RR-0239; RR-0242; RR-0247; RR-0248; RR-0255; RR-0259; RR-0260; RR-0263; RR-0266; RR-0270; RR-0272; RR-0278; RR-0282; RR-0284; RR-0290; RR-0295; RR-0307; RR-0316; RR-0317; RR-0318; RR-0322; RR-0324; RR-0327; RR-0328; RR-0329; RR-0334; RR-0344; RR-0345; RR-0349; RR-0351; RR-0352; RR-0354; RR-0359; RR-0361; RR-0366; RR-0367; RR-0368; RR-0371; RR-0373; RR-0374; RR-0380; RR-0381; RR-0386; RR-0389; RR-0393; RR-0394; RR-0397; RR-0398; RR-0402; RR-0412; RR-0417; RR-0425; RR-0428; RR-0432; RR-0433; RR-0440; RR-0442; RR-0449; RR-0455; RR-0460; RR-0471; RR-0472; RR-0477; RR-0478; RR-0480; RR-0481; RR-0484; RR-0499; RR-0506; RR-0507; RR-0524; RR-0530; RR-0531; RR-0533; RR-0535; RR-0537; RR-0539; RR-0541; RR-0543; RR-0546; RR-0550; RR-0552; RR-0569; RR-0572; RR-0577; RR-0582; RR-0592; RR-0595; RR-0596; RR-0598; RR-0602; RR-0603; RR-0610; RR-0611; RR-0613; RR-0621; RR-0624; RR-0626; RR-0630; RR-0636; RR-0643; RR-0650; RR-0675; RR-0679; RR-0680; RR-0683; RR-0686; RR-0690; RR-0693; RR-0694; RR-0700; RR-0705; RR-0710; RR-0714; RR-0715; RR-0716; RR-0721; RR-0723; RR-0726; RR-0731; RR-0733; RR-0734; RR-0735; RR-0740; RR-0741; RR-0743; RR-0752; RR-0754; RR-0755; RR-0759; RR-0766; RR-0772; RR-0773; RR-0780; RR-0783; RR-0786; RR-0799; RR-0801; RR-0802; RR-0806; RR-0812; RR-0813; RR-0817; RR-0818; RR-0820; RR-0823; RR-0824; RR-0826; RR-0827; RR-0828; RR-0829; RR-0830; RR-0834; RR-0835; RR-0841; RR-0844; RR-0847; RR-0852; RR-0853; RR-0854; RR-0856; RR-0862; RR-0864; RR-0869; RR-0871; RR-0873; RR-0879; RR-0881;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-0883; RR-0884; RR-0886; RR-0890; RR-0891; RR-0892; RR-0894; RR-0899; RR-0913; RR-0914; RR-0919; RR-0922; RR-0927; RR-0940; RR-0948; RR-0950; RR-0952; RR-0955; RR-0961; RR-0966; RR-0969; RR-0971; RR-0973; RR-0974; RR-0979; RR-0987; RR-0998; RR-1000; RR-1009; RR-1010; RR-1011; RR-1014; RR-1023; RR-1030; RR-1034; RR-1046; RR-1057; RR-1063; RR-1064; RR-1066; RR-1069; RR-1071; RR-1086; RR-1087; RR-1102; RR-1104; RR-1114; RR-1120; RR-1121; RR-1122; RR-1128; RR-1131; RR-1132; RR-1134; RR-1137; RR-1138; RR-1148; RR-1149; RR-1170; RR-1180; RR-1181; RR-1194; RR-1195; RR-1196; RR-1199; RR-1202; RR-1205; RR-1208; RR-1212
Transport and Access	TRA-	RR-0001; RR-0002; RR-0003; RR-0006; RR-0007; RR-0008; RR-0009; RR-0010; RR-0018; RR-0021; RR-0022; RR-0025; RR-0028; RR-0030; RR-0031; RR-0036; RR-0040; RR-0046; RR-0052; RR-0059; RR-0070; RR-0075; RR-0077; RR-0079; RR-0085; RR-0098; RR-0100; RR-0101; RR-0102; RR-0105; RR-0107; RR-0111; RR-0114; RR-0122; RR-0123; RR-0124; RR-0128; RR-0132; RR-0134; RR-0137; RR-0148; RR-0151; RR-0157; RR-0158; RR-0161; RR-0162; RR-0164; RR-0168; RR-0171; RR-0175; RR-0183; RR-0187; RR-0188; RR-0191; RR-0192; RR-0193; RR-0197; RR-0199; RR-0201; RR-0203; RR-0204; RR-0207; RR-0210; RR-0212; RR-0215; RR-0217; RR-0219; RR-0226; RR-0230; RR-0231; RR-0232; RR-0234; RR-0235; RR-0236; RR-0241; RR-0242; RR-0248; RR-0253; RR-0260; RR-0264; RR-0266; RR-0277; RR-0280; RR-0282; RR-0283; RR-0284; RR-0285; RR-0294; RR-0297; RR-0298; RR-0299; RR-0307; RR-0308; RR-0309; RR-0310; RR-0316; RR-0321; RR-0322; RR-0325; RR-0327; RR-0335; RR-0336; RR-0343; RR-0344; RR-0349; RR-0351; RR-0353; RR-0357; RR-0359; RR-0361; RR-0362; RR-0367; RR-0368; RR-0374; RR-0375; RR-0376; RR-0379; RR-0381; RR-0383; RR-0387; RR-0389; RR-0392; RR-0393; RR-0395; RR-0397; RR-0405; RR-0408; RR-0409; RR-0411; RR-0412; RR-0418; RR-0421; RR-0422; RR-0424; RR-0427; RR-0428; RR-0429; RR-0432; RR-0433; RR-0435; RR-0436; RR-0437; RR-0442; RR-0445; RR-0449; RR-0453; RR-0456; RR-0461; RR-0462; RR-0464; RR-0468; RR-0469; RR-0472; RR-0476; RR-0478; RR-0480; RR-0485; RR-0515; RR-0523; RR-0537; RR-0543; RR-0545; RR-0561; RR-0563; RR-0569; RR-0572; RR-0582; RR-0590; RR-0594; RR-0613; RR-0628; RR-0629; RR-0652; RR-0663; RR-0684; RR-0686; RR-0690; RR-0694; RR-0700; RR-0705; RR-0710; RR-0712; RR-0731; RR-0734; RR-0748; RR-0757; RR-0765; RR-0771; RR-0772; RR-0774; RR-0782; RR-0783; RR-0785; RR-0787; RR-0799; RR-0802; RR-0804; RR-0806; RR-0813; RR-0814; RR-0815; RR-0818; RR-0820; RR-0826; RR-0827; RR-0828; RR-0829; RR-0830; RR-0835; RR-0839; RR-0841; RR-0844; RR-0845; RR-0847; RR-0850; RR-0852; RR-0856; RR-0864; RR-0869; RR-0872; RR-0873; RR-0883; RR-0884; RR-0888; RR-0891; RR-0893; RR-0894; RR-0897; RR-0898; RR-0941; RR-0944; RR-0959; RR-0966; RR-0969; RR-0971; RR-0973; RR-0974; RR-0977; RR-0984; RR-0995; RR-1000; RR-1017; RR-1041; RR-1045; RR-1049; RR-1053; RR-1055; RR-1068; RR-1069; RR-1093;



Theme Options	Acronym	Relevant Representation responded to through the Theme Option
		RR-1105; RR-1111; RR-1130; RR-1138; RR-1141; RR-1143; RR-1146; RR-1149; RR-1181; RR-1183; RR-1201; RR-1203; RR-1207; RR-1213; RR-1215; RR-1235; RR-1239



2 The Applicant's Responses to the Host and Neighbouring Local Authorities

2.1 Milton Keynes City Council

Table 2.1: [RR-1233](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MKCC-001	General	Status of Milton Keynes City Council	Milton Keynes City Council (MKCC) are a host authority for the Green Hill Solar Farm DCO. As host authority MKCC are automatically an Interested Party for the duration of the examination (Section 102(1)(c) of the Planning Act 2008) and do not need to register to participate, however we welcome the opportunity to submit Relevant Representations. MKCC have liaised with the applicant for a number of months and have provided comments throughout the pre-submission period.	The Applicant notes this comment.
MKCC-002	The Scheme	Key Considerations	MKCC will provide detailed comments within its Local Impact Report (LIR) and may submit a Written Representation (WR) during the examination. The LIR will set out the views of MKCC following a detailed appraisal of the submission documents. MKCC consider that an assessment of the following issues is pertinent to the consideration of the case, and a full assessment of these will follow in the LIR: • landscape and visual effects; • ecology, biodiversity and trees; • traffic and transport; impacts on the Public Rights of Way network; • flood risk and drainage; • archaeology; and • heritage impacts.	The Applicant notes this comment and will respond in full upon receiving the Local Impact Report at the appropriate deadline. The Applicant is in discussions with the Council to progress a Draft Statement of Common Ground [EX2/GH8.3.3] which covers these matters and others.



2.2 North Northamptonshire Council

Table 2.2: [RR-1243](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NNC-001	General	Status of North Northamptonshire Council	Introduction This submission represents the Relevant Representation (RR) of North Northamptonshire Council (NNC) in relation to Green Hill Solar Farm (GHSF) submitted for determination for development consent in accordance with the Planning Act 2008 (PA2008) as a Nationally Significant Infrastructure Project (NSIP). NNC is a relevant local authority as a host local authority for the project. The 'order limits' of the Development Consent Order (DCO) includes the development of land within the administration boundary of NNC, specifically Green Hill C, Green Hill D, Green Hill E, Green Hill F, Green Hill BESS and various Cable Route Corridors. In accordance with section 102(1)(C) of the PA2008, NNC automatically qualifies as an 'interested party' (IP) for the purpose of the examination of the project. In its capacity as an 'interested party', NNC submits this RR in accordance with sections 56 and 102(4) of the PA2008. This RR is made without prejudice to the future views that may be expressed by NNC in its	The Applicant notes this comment and awaits a full response at the appropriate deadline.



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			capacity as an IP in the examination process. Scope of this Relevant Representation. In this RR, NNC sets out what it currently identifies as the key issues relating to the project, based upon an initial review of the extensive DCO application material. NNC will provide a detailed case on the impact of the application within its Local Impact Report (LIR). The LIR will set out the views of NNC following an opportunity to appraise the application in detail. It will expand upon the importance of each issue and will assess them against the relevant policy framework to provide a position on the overall planning balance (acceptability) of the project.	
NNC-002	General	Policy framework and decision making	At the time of writing these representations, NNC have not progressed any 'agreed' matters with the Applicant in the form of a Draft Statement of Common Ground (SOCG) but intends to work proactively with the Applicant during the pre-examination and examination period in this regard. Core issues for consideration NNC will set out its position on the compliance of the application with the PA2008 for the purpose of decision making in its LIR. The assessment and planning balance will be	A Draft Statement of Common Ground is being progressed with North Northamptonshire Council with the latest position of the two parties set out in the Draft North Northamptonshire Council Statement of Common Ground [EX2/GH8.3.1]. The Scheme has been assessed against relevant national and local planning policies (including NNC's Joint Core Strategy Policy 26 – Renewable and Low Carbon Energy) as set out in the Planning



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			carried out with regard to matters that include: • Relevant National Policy Statements; • National Planning Policy Framework; • The statutory development plan framework (Adopted North Northamptonshire Joint Core Strategy 2011-2031, Northamptonshire Minerals and Waste Local Plan (NMWLP) (Adopted July 2017), Neighbourhood Plans - Earls Barton Neighbourhood Plan (Made January 2016)); • National Infrastructure Planning Guidance and advice notes • Representations from other parties NNC reserves the right to raise further matters relating to compliance with any primary or secondary legislation, and important and relevant policy, that may arise during the examination process. Project specific impacts NNC will fully explore the impacts of the GHSF in its LIR and Written Representations (WR) following a detailed appraisal of the application documents. Without prejudice to matters that are identified following a detailed assessment, NNC expect the	Statement [APP-559] and the Policy Compliance Document [APP-567].



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			following matters to be scrutinised in detail through the examination phase: • Policy Compliance • Landscape and Visual Impact • Ecology and Biodiversity Impacts • Cultural Heritage • Highways and Transportation • Agricultural Land Use • Surface Water, Flooding and Drainage • Minerals and Waste • Environmental Protection • Effects on Public Amenity and Recreation • Crime Prevention • Socio-economic • Planning Obligations/Community Benefits NNC will also express its judgement on the 'planning balance', assessing all of the schemes benefits and disbenefits against the relevant policy framework to provide an overall conclusion on the acceptability of the application. In addition to the submission of a WR and LIR, NNC understands its role in the	



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			examination process to respond to written questions directed to them and the requirement to participate in Hearings as scheduled by the Examining Authority. Policy Compliance National Policy Statements (NPS) clearly set out a range of specific and generic impacts that should be considered when determining applications for NSIPs and it is these key areas that this RR will focus on. Existing NNC policy (Joint Core Strategy Policy 26 – Renewable and Low Carbon Energy) supports the development of renewable energy schemes in appropriate locations and a number of solar farms have been approved in recent years and are already operational within the district. However, proposals will not be supported unless the harms of the projects alone, as well as cumulatively and in combination of other projects, are adequately recognised, assessed, appropriately mitigated, and if necessary, compensated. A full review of Policy 26 compliance will be undertaken.	
NNC-003	Landscape and Visual	Landscape and Visual documents	Landscape and Visual Impact NNC's Landscape Consultant has been engaged in the development of the GHSF proposal for over 12 months, providing formal responses at both the Environmental Impact Assessment Scoping stage (EIA) and through the Preliminary Environmental Information Report (PEIR) consultation.	The Applicant notes this comment.



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			The following comments in relation to landscape and visual matters is based on review of the submitted Environmental Statement (ES) - Chapter 8: Landscape and Visual Impact Assessment (LVIA), supporting figures, the Outline Landscape and Ecological Management Plan (OLEMP), and other associated documentation. NNC remains committed to engagement through the DCO process and is supportive in principle of renewable energy infrastructure but expects high standards of landscape integration and protection of local visual amenity.	
NNC-004	Landscape and Visual	Landscape and Visual Effects	Summary of Landscape and Visual Effects The proposed development would introduce a large-scale transformation across a dispersed group of land parcels, resulting in landscape and visual effects over an extensive area. The LVIA recognises the distribution of effects but underrepresents the scale and magnitude of change, particularly for landscape character receptors and visual receptors in close proximity to the proposed infrastructure. The scale of development, and the cumulative presence of multiple sites, introduces a notable shift from a predominantly rural agricultural landscape	ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects of the Scheme on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments. Although the Scheme comprises a series of independent areas of land



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			to one more associated with engineered energy infrastructure.	or Sites, they are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRow and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme will not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides



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				scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern. This 'network of sites' approach demonstrates good design by allowing for a fine-tuned approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing landscape features, and provide enhanced landscaping and vegetation. This demonstrates how the Scheme is sensitive and responsive to place.
NNC-005	Landscape and Visual	Visual Effects	This proposed development alters the underlying perceptual and experiential qualities that define the landscape. The introduction of solar arrays, fencing, substations and associated infrastructure across numerous locations weakens the areas sense of rural and agricultural character, particularly where these elements are visible in combination or sequentially. This is especially relevant in areas where the undeveloped skylines and	ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the



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			sparse settlement pattern contribute to a strong sense of place and identity.	solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons for this are set out below: 1. Dispersed nature of the Sites: The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. 2. Nature of Scheme being 'overlaid' and reversible: For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the



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				exception of the footprint of the buildings, are 'overlaid' on the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. 3. Strong framework of existing vegetation: The strong framework of existing vegetation provides the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. 4. The benefits of mitigation: The benefits of the new planting in reducing the adverse effects are identified in the assessment of Year 15 of the operational phase of the Scheme. Please refer to ES Chapter 8 Landscape and Visual Impact [APP-045], specifically Table 8.10 which sets out the Planting



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				Typologies utilised within the Landscape and Ecology Mitigation Plans [APP-207 to APP-219] and Table 8.11 to sets out the quantity of landscape enhancements the Scheme would provide: • 14.45 ha of Green Corridor and Woodland Planting; • 12.81 ha Enhanced Riparian Native Planting; • 43.13 km of Hedgerow Reinforcement and Reinforced Roadside Vegetation; • 15.61 km of Proposed Hedgerows; • 6 proposed Ponds and Wader Scrapes; and • 1,079.6 ha of Groundcover. 5. Biodiversity Net Gain: In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity (the quantum of which is set out in ES Appendix 9.13: BNG Assessment Revision A [EX1/GH6.3.9.13_A]). This would deliver additional enhancement and connections to wider ecological



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				networks as well as contributing to the enhancement of the quality of the landscape. 6. Legacy Landscape: Legacy Landscape is where, because of the development, the landscape would be left in a better condition following decommissioning than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, agricultural fields would be returned back to agriculture. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation likely to be retained by landowners for the potential benefits to agricultural land and the wider farming estate, in turn providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much



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				stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
NNC-006	Landscape and Visual	Visual Effects	The visual impacts are extensive, particularly for road users, residential receptors, and public rights of way (PRoW) users. These groups will experience change over a wide geographic area, with several receptors exposed to frequent, prolonged or sequential views. The visual impact is particularly notable where multiple sites are visible in succession, or where topography and localised elevation allow long-ranging, open views across multiple land parcels.	ES Chapter 8 Landscape and Visual Impact [APP-045] includes an assessment of potential visual effects associated with the Scheme with Appendix 8.3 ES LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] containing details on individual Visual Assessments. Visual Receptors are shown on ES Figure 8.7: Visual Receptors [APP-266] . The LVIA considers that for some aspects of the Scheme (the construction stage and up to Year 15 in particular), that there is the scope for Significant



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				visual effects. However, where impacts and effects have been identified, landscape mitigation measures have been applied to offset or remedy adverse effects, resulting in relatively few significant visual effects remaining following the establishment of the mitigation planting (Year 15). The LVIA includes an assessment of the Cumulative Effects of the Scheme based on the 9 Sites forming the Scheme and includes an assessment of both Combined (in the same view) and Sequential (different developments revealed in succession as a series of sequential views) visibility. The LVIA found that Sequential Effects are not considered to be any greater than those effects identified for the individual sections of PRoW as set out within ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A]. The LVIA process considers adverse effects and specific measures have been put forward where practicable. The mitigation measures proposed will be established by Year 15 of the Scheme (during the operational period). The impacts at Year 15 of



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				the Scheme are considered as most relevant to all other stages of the Scheme and the mitigation under review. This is because the mitigation, once established, is the most inherent in the context of landscape character and visual amenity of the majority of the lifetime of the Scheme. The position at 'Year 15' is judged in terms of the effectiveness of maturation of planting and the 'time depth' of the receiving landscape. These measures take into account the potential landscape and visual effects identified at an early stage through the iterative design process and include retention and reinforcement of existing vegetation, new planting along the margins of the solar panels to assist with their integration in the immediate context, new planting within the Sites to provide a strong landscape framework and support habitat connectivity, new planting to screen the panels in their wider landscape context, and new planting to bolster the overall landscape character context of the Sites. Following the implementation of the appropriate site-specific mitigation



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				measures the significant long-term (residual) effects are considerably reduced, to only the receptors set out within Table 8.19 and Table 8.20 of ES Chapter 8 Landscape and Visual Impact [APP-045] .
NNC-007	Landscape and Visual	Visual Effects Mitigation	Although the ES proposes a broad suite of mitigation measures, including hedgerow reinforcement, native woodland planting, ecological buffers, and targeted copse creation, the effectiveness of these measures remains uncertain in the early operational years. Many of the proposed interventions will take several years to reach maturity and may not effectively screen views within the initial years of operation, when visual contrast and intrusion are likely to be most apparent.	ES Chapter 8 Landscape and Visual Impact [APP-045] includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The landscape mitigation has been a key consideration throughout the assessment as an iterative part of the process and linked to the review of published character assessments. It is acknowledged that the embedded mitigation (proposed planting) would not have an immediate mitigating impact on significant effects. The assessment of the effects of the Embedded Mitigation (proposed planting) has assumed a uniform rate of growth is allowed for trees, shelterbelts, and woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached



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				a minimum height of 7.5m. A uniform growth rate is allowed for new hedgerows of 0.4m every 1 year. This would result in hedgerows being able to be maintained at a height of 4.5m by Year 15. The OLEMP Revision A [EX1/GH7.4_A] prescribes how the landscape and ecology mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives of the landscape mitigation.
NNC-008	Landscape and Visual	Landscape and ecological mitigation	Nevertheless, NNC recognises that the scheme includes a significant quantity of landscape and ecological mitigation across multiple sites. If fully delivered and subject to long-term management, these measures could result in notable enhancements to green infrastructure and biodiversity value over the medium to long term. The success of this strategy is dependent on effective implementation, phasing, and ongoing maintenance to ensure the intended benefits are realised and adverse effects are appropriately reduced.	The Applicant notes this comment. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A]. The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A]. Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064].



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NNC-009	Landscape and Visual	Landscape Effects	Key Areas of Concern- The GHSP proposal represents a scheme of considerable geographic scale, with multiple dispersed development parcels extending across approximately 500 hectares of open countryside. The project comprises not only of solar PV arrays, but also battery storage infrastructure, substations, cable corridors, and associated access and mitigation works. The submitted ES includes supporting documents such as ES Chapter 8 (LVIA), the Outline LEMP (GH7.4), and associated appendices and figures illustrate the extent of landscape intervention proposed. While the application contains detailed assessments and proposals, the magnitude and spatial distribution of the scheme, combined with the sensitive landscape context necessitate particular scrutiny. On this basis, the following key matters are raised for the attention of the Examining Authority as being of particular concern or significance:	The Applicant notes this comment.
NNC-010	Landscape and Visual	Landscape Effects	Landscape Effects The LVIA maintains effect ratings that appear understated in light of the proposed change, particularly for in relation to impacts on landscape character. This is most apparent from Site E and Site F. These parcels lie on elevated or sloping ground, with limited existing landscape	ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as



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			containment. They are visually prominent from local roads, PRowWs and nearby residential properties, particularly on approaches to Grendon and Mears Ashby. According to the LVIA (ES Chapter 8, para. 8.7.65), effects on local landscape character are assessed as Moderate-Adverse at Year 1, reducing to Minor-Adverse by Year 15 following mitigation planting. However, these ratings appear optimistic given the substantial shift in land use, from open, rural arable fields with a strong agricultural context to engineered energy infrastructure featuring solar arrays, fencing, internal access tracks, and associated infrastructure. While new planting may eventually filter views, the assessment does not adequately reflect the scale of the change, nor the perceptual impacts arising from this transformation. The loss of openness and rural character qualities that underpin the area's sensitivity are downplayed in the current judgements. These effects are likely to remain noticeable and adverse even in the longer term, despite vegetation establishment.	they change from an area of arable farmland to solar infrastructure. NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments. Specifically with regard to Site E and F, the LVIA recognises the shift from open agricultural farmland to large scale solar infrastructure stating that the character of the Sites themselves and their immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme leading to Significant adverse effects on local landscape character. However, this needs to be considered against the ability of the receiving landscape to accommodate the low lying infrastructure. Within the study area there would be limited appreciation of the array or associated infrastructure, with the integrity of the character of the receiving landscape preserved, along with all landscape features within retained and enhanced. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now



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				presenting as a large scale solar scheme. The LVIA recognises the long term adverse effects upon the character of the local landscape with long-term (residual) effects being identified as being Moderate / Minor Adverse.
NNC-011	Landscape and Visual	Landscape Effects	While Sites E and F represent particularly sensitive and prominent locations, similar underrepresentation of character-related impacts appears to apply to other parcels within the scheme. In several cases, effect ratings rely heavily on the presence of boundary vegetation or the potential for mitigation planting to reduce visibility. However, the presence of visual screening does not negate the change in land use and perceptual qualities that contribute to landscape character. The shift to a more functional, infrastructure-led landscape remains apparent, particularly for those moving through or living within the local area. Even where containment is partially achieved, the engineered and repetitive form of the development introduces a contrasting typology that interrupts the established landscape structure.	The Applicant notes this comment. ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure resulting in Significant adverse effects to landscape character and visual amenity. NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments. These effects have been mitigated through good design reducing the long-term (residual) effects as far as practicable. Please refer to the applicant's response to



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				'NNC-004' and 'NNC-005' for more information.
NNC-012	Landscape and Visual	Cumulative Landscape Effects	In addition to site-specific concerns, the distribution of multiple parcels across the wider landscape gives rise to cumulative landscape character impacts. Each site is largely assessed in isolation, with limited recognition of how the scheme as a whole alters the perception of the wider rural environment. The combined effect is a gradual but perceptible shift in character from an intact and coherent agricultural setting to one defined by the frequent and sequential presence of infrastructure.	ES Appendix 8.1 LVIA Methodology [APP-078 to APP-079] contains a detailed methodology of the approach undertaken within the LVIA to assessing multiple individual Sites which contribute to a larger aggregated Scheme. Due to the disassociated nature of the Scheme, the overall assessment of the Scheme is based primarily upon the findings associated with each of the individual Sites. In assessing the Scheme, in accordance with GLVIA3, professional judgment is applied alongside reference to the suite of landscape and visual figures and desktop and site based assessment. In reaching the overall assessment of effects associated with the Scheme the cumulative effects of each of the Sites and Cable Route Corridor are assessed and combined to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme. Appendix 8.3 ES LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] contains an



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				Assessment of Cumulative Site Effects on the different Landscape Study Areas and Landscape Fabric with a detailed examination of effects set out within section 8.9 of ES Chapter 8 Landscape and Visual Impact [APP-045]. Cumulative Site Visual Effects are addressed within section 8.9 of ES Chapter 8 Landscape and Visual Impact [APP-045] with Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] containing details on the individual Visual Assessments. This includes an assessment of both Combined views and Sequential views. GLVIA3 defines types of cumulative visual effect as either: Combined (in the same view) or Sequential, (when the observer has to move to another viewpoint to see the same or different developments). ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable



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				farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons are set out above at the applicant's response to 'NNC-005'.
NNC-013	Landscape and Visual	Viewpoints Mitigation	In summary, while visual containment and mitigation planting may reduce the extent of visibility from specific viewpoints, they do not fully address the perceptual and experiential impacts of the development on landscape character. The overall approach taken by the LVIA appears to undervalue these effects.	ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and in doing so, recognises the perceptual and experiential impacts of the development on landscape character. The LVIA acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure and how this would adversely impact upon the visual amenity of the area as people move throughout the receiving landscape. Please refer to the applicant's response to 'NNC-004' and 'NNC-005' for how good design has been incorporated in the approach to Scheme design, to



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				minimise landscape and visual effects.
NNC-014	Landscape and Visual	Visual Effects	The scheme covers a broad geographical area and comprises dispersed but intervisible sites. This configuration contributes to a high degree of visual exposure across the receiving landscape, particularly affecting receptors in close proximity to individual parcels or those travelling between them. Road users, especially those using the A509 and the network of minor rural lanes between Wollaston, Easton Maudit, Great Doddington, and Mears Ashby, are likely to encounter sequential and repeated glimpses of solar infrastructure. These often appear in foreground or mid-ground views, and frequently disrupt the prevailing rural scene.	The Applicant notes this comment. The Scheme comprises a series of independent areas of land or Sites set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRow and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme will not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore



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				offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern. This 'network of sites' approach demonstrates good design by allowing for a fine-tuning approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing, and provide enhanced landscaping and vegetation. This demonstrates how the Scheme is sensitive and responsive to place. The LVIA includes an assessment of the Cumulative Effects of the Scheme based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments



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				revealed in succession as a series of sequential views) visibility. The LVIA found that Sequential Effects are not considered to be any greater than those effects identified for the individual sections as set out within ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] .
NNC-015	Landscape and Visual	Visual Effects	In particular, the experience of travelling along Easton Lane as one departs Easton Maudit heading north or west is currently defined by open countryside views, including the rising landform and hedgerow pattern that contributes to the rural setting of the village. While Viewpoint NN10 (north of Easton Maudit) is referenced in the LVIA, the significant change apparent in Viewpoint NN13, which also illustrates the impacts on open views by new infrastructure are not referenced. The visual effects here are underrepresented, particularly given the expanse of panel arrays and fencing visible.	Easton Lane is identified as Transport Receptor TR080: Easton Lane (C Road) within ES Figure 8.12 [APP-320] . Viewpoints are representative of views from the receptor and helpful in illustrating views, however, the assessment of effects is established through a combination of field and desk work. The LVIA includes a full assessment of potential effects of this section of highway, identifying a High Magnitude of Change and concluding Major / Moderate (Significant) effects to road users during construction and Year 1. The LVIA states that users would experience direct views into construction activities within fields FF25 and FF26 to the south and FF19 and 21 to the north, as well as views south into FF25 of the 132kv substation and surrounding array under construction. There would also



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				be views west to the construction activities within FF19. The LVIA recognises that the proposed mitigation planting would have a limited effect initially with views of the substation and array persisting and Major / Moderate Adverse effects remaining until the establishment of the proposed mitigation, including a belt of native woodland copse/shelter belt (scrub and tree planting) along the southern side of Easton Lane as well as the existing roadside hedgerow to be reinforced with densely spaced native tree planting. The LVIA recognises that by year 15 these measures would have established helping provide screening of the Scheme and reducing the Magnitude of Change to Very Low (due to the mitigation planting mostly screening views of the substation and surrounding array infrastructure), however Minor Adverse visual effects would remain.
NNC-016	Landscape and Visual	Visual Effects Public Rights of Way	PRoW users are similarly affected, with footpaths NN/TF/7, NN/MA/7 and MW2 traversing or running directly adjacent to several site boundaries. Walkers are likely to be exposed to extended stretches of fencing, access tracks, and solar arrays, reducing visual amenity and diminishing	NN/TF/7 has receptor ID TP161. At its closest point to the Scheme, this footpath is 646m from the BESS Site. It does not traverse or run directly adjacent to site boundaries. Clarification is therefore requested



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			the rural and recreational quality of these routes.	as to the specific concern being raised here. Clarification is also requested in regard to PRow NN/MA/7 and MW2. Neither of these references are recognised within the identified receptor list and are therefore not thought to be located near to the Scheme. If possible, please can any clarification provided include the relevant project receptor numbers. Whilst the above PRowS are not recognised as traversing or running directly adjacent to site boundaries, the Applicant does recognise that this is the case for some other PRow. ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on visual amenity in detail, and acknowledges that in many locations, there would be there would be significant adverse effects to users of PRow within and adjacent to the Scheme, with 27 Public Receptors being identified as experiencing Significant Adverse effects until the establishment of the proposed mitigation planting. These mitigation planting measures have been designed to take consideration of the potential landscape and visual



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				effects identified at an early stage in the iterative design process and includes retention and reinforcement of existing vegetation, new planting along the margins of the solar panels to assist with their integration in the immediate context, new planting within the Sites to provide a strong landscape framework and support habitat connectivity, new planting to screen the panels in their wider landscape context, and new planting to bolster the overall landscape character context of the Sites. Following the implementation of the appropriate site-specific mitigation measures the significant long-term (residual) effects are considerably reduced, to only the receptors set out within Table 8.19 and Table 8.20 of ES Chapter 8 Landscape and Visual Impact [APP-045]. The Applicant confirms a full assessment of PRow's is set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. This assesses the impact on the useability and user experience of each PRow likely to be affected by the Scheme individually at the construction,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				operation, replacement, and decommissioning phases of the Scheme. The assessment in ES Chapter 18: Human Health [APP-055] furthermore considers the health and wellbeing impact of changes to the use and enjoyment of PRowS and access to open space and leisure space, and finds no likely significant adverse effects at any phase of the Scheme. The Scheme design includes embedded mitigation to reduce adverse effects on PRow user experience, including a minimum 15 m offset from PRow centrelines to Solar PV infrastructure (set out in the CDPP Revision A [EX1/GH7.17_A]) with fencing generally 8-10 m from PRowS. Groundcover planting such as tussocky field margins and enhancement to hedgerows are committed to in the OLEMP Revision A [EX1/GH7.4_A]. These measures are secured by requirement in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. With respect to the routes identified: Footpath NN TF 7 runs to the north of Green Hill F but is likely to be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				largely screened from the Scheme by intervening topography. No significant adverse effect is anticipated for users. PROW NN MA 7 is not able to be identified, but is assumed to relate to the parish of Great Addington, 13.5 km east of Green Hill A.2. Footpath NN MW 2 is located in Easton on the Hill, 37 km NE of Green Hill A.
NNC-017	Landscape and Visual	Residential receptors	Residential receptors are also likely to experience significant adverse effects, particularly in locations where mitigation planting is limited and panel arrays are located on sloping or elevated ground. While mitigation planting may assist in filtering views over time, the scale, proximity and engineered character of the infrastructure will remain apparent for many receptors, particularly in winter months and early operational years.	ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on visual amenity in detail, and acknowledges that in many locations, there would be significant adverse effects to Residential Receptors, with 11 Residential Receptors being identified as experiencing Significant Adverse effects until the establishment of the proposed mitigation planting. Following the implementation of the appropriate site-specific mitigation measures the significant long-term (residual) effects are considerably reduced to only the receptors set out within Table 8.19 and Table 8.20 ES Chapter 8 Landscape and Visual Impact [APP-045] with no



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Significant Adverse effects on Residential Receptors remaining.
NNC-018	Landscape and Visual	Residual visual effects	The LVIA does acknowledge that significant residual visual effects are likely to remain at a number of locations. However, the assessment downplays experiential and sequential effects and gives limited attention to underrepresented locations such as Easton Lane. Given the configuration and visibility of the scheme, adverse visual effects will remain notable in both the short and longer term, particularly where views are open and receptors are close to site boundaries.	ES Chapter 8 Landscape and Visual Impact [APP-045] of takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The LVIA includes an assessment of the Cumulative Effects of the Scheme based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views) visibility. The LVIA found that Sequential Effects are not considered to be any greater than those effects identified for the individual sections as set out within ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A]. NPS EN 1 recognises that impacts and effects are likely to be experienced with



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				large scale ground mounted solar developments. As set out in the response to NNC-015 above, Easton Lane is identified as Transport Receptor TR080: Easton Lane (C Road) and also TR081: Easton Lane (C Road) within the LVIA. This is due to a short section of the highway within Easton Maudit being recorded as Grendon Road (TR086). The LVIA includes a full assessment of potential effects of these sections of highway finding Significant effects in construction and year 1 from both sections of Easton Way. Significant effects were not identified for the short section of Grendon Road within Easton Maudit due to containment provided by the adjacent built form and roadside hedgerow.
NNC-019	Landscape and Visual	Mitigation Planting and Assumptions	NNC acknowledges the extent and ambition of the mitigation strategy proposed. The submitted Landscape and Ecology Mitigation Plans (Figures 4.12 to 4.17) illustrate a comprehensive suite of landscape proposals, including substantial lengths of new and reinforced native hedgerows, broad habitat buffers around field boundaries, native tree belts, and woodland block planting. In particular, the creation of new copses, infill planting along	The Applicant notes this comment. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A] . The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			roadsides and PRowS, and enhancement of existing hedgerows are commendable. The integration of wildflower grassland and ecological corridors also adds clear biodiversity value and helps improve the overall green infrastructure network. These measures reflect a strong landscape-led approach and demonstrate potential to provide long-term enhancement to both visual amenity and ecological function. However, the ES places a high degree of reliance on these vegetation-based measures to mitigate visual and landscape effects, particularly in the long term (e.g. Year 15).	Draft DCO Revision A [EX1/GH3.1_A] . Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064] .
NNC-020	Landscape and Visual	Mitigation	NNC supports the principle of the proposed landscape interventions and recognises their potential value. However, for these to provide meaningful mitigation, a phasing and delivery schedule, detailed planting specifications, and early establishment commitments will be critical to realising the intended landscape and visual benefits.	The Applicant notes this comment. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A] and secured by Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A] . Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064] .
NNC-021	Landscape and Visual	Landscape and Visual Effects	To Conclude In summary, while NNC supports the delivery of renewable energy in principle,	The Applicant notes this comment. ES Chapter 8 Landscape and Visual Impact [APP-045] takes into



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the GHSF proposal raises a number of significant concerns in relation to landscape character and visual impact. The dispersed and extensive nature of the scheme, combined with its location within a predominantly rural and visually sensitive landscape, results in a wide-ranging transformation that is not fully reflected in the submitted LVIA. The assessment appears to understate the degree of perceptual and cumulative harm.	account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The LVIA includes an assessment of the Cumulative Effects of the Scheme based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views) visibility. The LVIA found that Sequential Effects are not considered to be any greater than those effects identified for the individual sections as set out within ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A]. NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments.
NNC-022	Landscape and Visual	Mitigation Implementation	Although a broad suite of mitigation measures is proposed, their effectiveness, especially in early operational years is	The Applicant notes this comment. The LVIA recognises that the proposed landscape mitigation



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			questionable. To ensure the best outcomes for landscape integration and local amenity, these matters will require ongoing scrutiny and careful implementation.	measures will take time to establish as set out within para 8.8.12 to 8.8.15 of ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A] and secured by Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A]. It is acknowledged that the Embedded Mitigation (proposed planting) would not have an immediate mitigating impact on significant effects. The assessment of the effects of the Embedded Mitigation (proposed planting) has assumed a uniform rate of growth is allowed for trees, shelterbelts, and woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached a minimum height of 7.5m. A uniform growth rate is allowed for new hedgerows of 0.4m every 1 year. This would result in hedgerows being able to be maintained at a height of 4.5m by Year 15, likely much sooner. The OLEMP Revision A [EX1/GH7.4_A] prescribes how the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				landscape and ecology mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives of the landscape mitigation. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A] and secured by Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A]. Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064].
NNC-023	Ecology and Biodiversity	Ecology and Biodiversity Impacts	NNC Ecology has reviewed the submitted DCO documents and provided the following initial comments. With ecological considerations, impacts from development may be experienced outside of the proposed development area itself, within the wider landscape. NNC Ecology has limited themselves to comments on potential impacts of development parcels within the NNC area, and to the potential impacts on ecological interests within the NNC area. Where impacts from the development may be	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			experienced across administrative boundaries, the ability to comment is constrained by access to relevant information and is limited to those issues highlighted by the Applicant in the submitted reports. For clarity, in practical terms, this response focuses on parcels known as Green Hill C, D, E, F and the BESS site, as well as those parts of the Cable Corridor Route which are situated in the NNC area. Often within the documentation, the Cable Corridor Route is referred to in generic terms, rather than locationally – where this happens, any responses made by NNC Ecology should be taken only to relate to those parts within NNC boundaries.	
NNC-024	Ecology and Biodiversity	HRA	Upper Nene Valley Gravel Pits SPA The Applicant has provided a Habitat Regulations Assessment (HRA) due to the proximity of large parts of the development to the Upper Nene Valley Gravel Pits (UNVGP) Special Protection Area (SPA). The SPA is within 0.01km of the BESS parcel, so this site has the greatest potential for impacts on the SPA by reason of proximity, and as a result of the nature of proposed use. The other sites are within 2km (Green Hill F), 5km (Green Hill D and E) and within 100km (Green Hill C). The 'Test of Likely Significant Effects' (TLSE) undertaken within the HRA finds	The Applicant notes this comment. The Applicant would note that they consider there is a typographical error in the representation which should refer to 10km (Green Hill C) rather than 100km.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			that there is no risk of direct habitat loss as the limits of the development do not overlap with the SPA at all. It also finds no risk of 'killing injury or removal of designated species either during development or operationally. This is accepted.	
NNC-025	Ecology and Biodiversity	HRA	The TLSE finds that there is no risk in isolation of likely significant effects for disturbance to species outside the SPA as they consider the species with potential to be impacted to be mobile, able to habituate to disturbance, and for there to be sufficient alternative land including proposed mitigation land. While there is merit in this stance, the Applicant acknowledges that not all areas within the relevant areas have been subject to the same amount of survey work for wintering birds, and it is possible that some of the issues are not yet fully assessed as a result. The HRA also finds that there is no risk of cumulative impacts for similar reasons, and similarly NNC Ecology feel that this may be a premature conclusion. These assessments are not necessarily incorrect but should be considered as still under discussion rather than assessed as no risk at present.	The Applicant notes this comment. The Sites which received a reduced survey effort have been assessed on a precautionary basis. Please refer to the applicant's response to 'NNC-027' for details of the precautionary approach taken to the provision of Functionally Linked Land mitigation in lieu of full survey data for all Sites. Further clarification will be added to the updated HRA Revision A [EX1/GH7.21_A] to address various other comments, including the addition of figures to show the location of the mitigation land being offered. This will be kept under review.
NNC-026	Ecology and Biodiversity	HRA	The HRA identifies risks of likely significant effects for airborne and waterborne pollution, spread of invasive/non-native species, surface water run-off, habitat	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			fragmentation, and disturbance to species within the SPA. These assessments are agreed with and are subject to Appropriate Assessment.	
NNC-027	Ecology and Biodiversity	Functionally Linked Land (FLL)	NNC Ecology are unable to comment on the risks associated with airborne pollution, waterborne pollution and the risks of fire and other similar operational matters. NNC's primary concern is on the impact that the proposed development would have on the availability and suitability of, and access to, Functionally Linked Land (FLL) used by priority species in association with the SPA – specifically Golden Plover and Lapwing. Golden Plover were recorded on Green Hill E and F, and were observed from Green Hill C, D and the BESS. Green Hill E was considered to provide FLL for the Golden Plover within the HRA. Lapwing were recorded on Green Hill C, E and F, with none of these sites being assessed as FLL. Green Hill F has not been subject to the same level of surveys as the other parcels due to its late inclusion in the proposals, and as such it is possible that it may be found to be of greater significance at a later stage following additional surveys.	The Applicant notes this comment. Further bird surveys beyond those submitted at the time of writing are not proposed. The survey scope, its justification and disparities in survey effort are discussed in Section 9.4 of the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and Section 7 of the HRA Revision A [EX1/GH7.21_A]. In lieu of two full seasons of survey effort across all Sites, precautionary mitigation land is offered. The principle of offering precautionary mitigation land to account for shortfalls in survey effort was agreed with Natural England, although Natural England did not clarify the methodology for determining the scope of such land (please refer to Table 1 of the HRA Revision A [EX1/GH7.21_A] and ES Appendix 9.4 Consultation Responses [APP-087]). The scope of precautionary mitigation land is explained and justified by the Applicant's ecologist in Section 7 of the HRA Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				[EX1/GH7.21_A] ; the quantum of land offered as mitigation exceeds the quantum of both confirmed and precautionarily assigned Functionally Linked Land (FLL).
NNC-028	Ecology and Biodiversity	HRA Functionally Linked Land (FLL)	The HRA identifies parcels of land to provide compensatory mitigation for the loss of the confirmed FLL parcels. Additionally, within the HRA there is recognition that the limited surveys carried out on Green Hill F to date require provision to be made for Precautionary Mitigation for potential FLL within this site. In response to this, one of the fields surveyed has been removed from the development area, while additional fields will be brought under management for the benefit of Golden Plover and Lapwing. The combined effect of the mitigation proposals results in a loss of 67 hectares of FLL and potential FLL, with mitigation land amounting to 98 hectares, an almost 50% increase in land, of which some – as a precautionary inclusion – may in fact effectively further increase the percentage increase from actual FLL figures. There are, additionally, substantial areas of FLL outside of the development area remaining unaffected and softening the impacts of transition for the mitigation areas from one management practice to another.	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NNC-029	Ecology and Biodiversity	SPA Functionally Linked Land (FLL)	Taking into account the confirmed use of the site by species associated with the SPA, the potential use of the under-surveyed parcels, the extent of other existing FLL in the vicinity, and the level of provision of mitigation land proposed by the Applicant, NNC Ecology are satisfied that the proposed development would not result in harm to species associated with the SPA.	The Applicant notes this comment.
NNC-030	Ecology and Biodiversity	Other Designated Sites	The proposed development does not overlap with any statutory or non-statutory sites with the exception of Earls Barton Local Wildlife Site, and three Protected Wildflower Verges, for which the Applicant claims no direct impact is anticipated. There are 14 Sites of Special Scientific Interest (SSSIs) within 5km of the North Northants sites, including the SPA. There are 31 Local Wildlife Sites within 2km of the North Northants sites. The nature of the proposals is such that it is not considered likely that there will be adverse indirect impacts on these sites as a result of the proposed development. Where such sites are outside of the development boundary and potentially vulnerable to indirect impacts, the Applicant has made provision to provide mitigation for the additional protection of the offsite features. An example of this is Horn Wood Local Wildlife Site, an Ancient	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Woodland immediately adjacent to the Green Hill F site, for which the applicant has provided for a 30 metre buffer which would provide suitable protections against harm. NNC Ecology are satisfied that (subject to the comment below) the development would not result in harm to any statutory or non-statutory sites.	
NNC-031	Ecology and Biodiversity	Other Designated Sites	With regard to Earls Barton Meadow, the Applicant indicates that the Local Wildlife Site (LWS) falls within the Cable Corridor search area, but that the intention is to use other land in the corridor without needing to impact on the LWS. Earls Barton Meadow is the only LWS with a potential risk of direct impacts. This site is within a cable corridor between Green Hill E site, and the BESS. While the LWS lies within the corridor, this does not mean that the route would directly impact the site. The Applicant has indicated that the intention is to avoid the LWS, but the nature of the development at this stage is such that they are unable to provide full assurances on this. It is important that this point is clarified as soon as possible, and that in the event that Earls Barton Meadow LWS cannot be avoided for the route, no works should be carried out here without agreement to the details of the scope,	The LWS will be avoided, either by routing the cable route around the LWS, or using trenchless cabling techniques such as Horizontal Directional Drilling to drill beneath the soil. This is a commitment (EN010170 – EB– 08) in the ES Chapter 27 Commitments Register [APP-064]. Implementation of mitigation is set out in the OEPMS Revision A [EX1/GH7.5_A]. This is secured in Schedule 2, Requirement 8 of Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			method and management of works with suitable mitigation agreed in advance.	
NNC-032	Ecology and Biodiversity	Protected verges	There are also three Protected Wildflower Verges within the development area, but these would not be directly impacted by the proposed works or operation of the sites.	The Applicant notes this comment.
NNC-033	Ecology and Biodiversity	Ecology conclusion	In summary, NNC Ecology are confident that - with the proviso around the clarity needed for Earls Barton Meadow, and mitigation secured in advance of works if required - there will be no adverse impacts on any statutory or non-statutory designated sites.	The Applicant notes this comment.
NNC-034	Ecology and Biodiversity	Protected Species Badgers	Protected species • Badgers In response to comments from NNC Ecology at an earlier stage, the Applicant has restated that surveys will be updated prior to commencement of works to ensure that there is no impact on badgers. NNC Ecology had requested that the surveys be carried out on an ongoing basis to ensure that an up to date and emerging pattern of use and distribution of badgers across the extensive development site was at all times feeding into the understanding of the meta population. It does not appear that the applicant has acknowledged this other than to restate their position that they already have extensive baseline data.	Badger surveys were completed across the Scheme, with any subsequent evidence of badgers, recorded during additional ecological surveys, added to the overall dataset. All badger data contributing to the ecological baseline is set out in ES Appendix 9.5 Badger Surveys CONFIDENTIAL [APP-088] . Completing surveys throughout the examination phase of the application would be disproportionate to the likely impacts of the Scheme on badgers, and therefore this has not formed part of the survey scope. However, as badgers can form new setts in very short spaces of time, an



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				update badger walkover survey is proposed prior to construction commencing. This is detailed in the OEPMS Revision A [EX1/GH7.5_A] .
NNC-035	Ecology and Biodiversity	Protected Species Badgers	NNC Ecology would still prefer that badger surveys should be carried out over time rather than restricted to taking place at the start of development. The Ecology chapter of the ES confirms the most recent record is dated 2022. All sites in North Northants other than the BESS have badger activity associated with them, with Green Hill E having the highest level of activity of all the sites. As a distributed site, with distributed badger populations (different social groups) active across the sites, a more comprehensive approach to monitoring badger activity could highlight movements earlier, that might subsequently become problematic, allowing for alternative design choices or mitigation measures to be viable.	NNC appear to have conflated the date of the most recent record gathered from local environmental records centres during the desk study (2022) with the data gathered from site surveys (2023-2025). All existing badger setts have been retained within the design, with proportionate protective ecological buffers applied. Since badgers typically build setts in boundary habitats (which are retained in the main and protected with their own habitat buffers), and the solar development is focused primarily in the open fields, the risk of conflict with any future setts is limited. As such, ongoing survey work is not being pursued as this is not considered necessary or proportionate. The ecological baseline relating to badgers and their setts is therefore considered more than sufficient to assess the potential impacts on this species. As set out in the OEPMS Revision A [EX1/GH7.5_A], pre-construction



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				badger surveys will be conducted to determine any changes in badger distribution, and inform the need for sett closure under licence. Additionally, ongoing monitoring during the construction phase will identify any subsequent changes. This is secured in Schedule 2, Requirement 8 of Draft DCO Revision A [EX1/GH3.1_A] .
NNC-036	Ecology and Biodiversity	Protected Species Badgers	The Applicant has set out mitigation relating to ensuring buffer zones around setts during construction, with a 15 metre buffer near outlying setts, and a 30 metre buffer near other sett category. This is acceptable to mitigate disturbance that might be experienced during the construction phase.	The Applicant notes this comment.
NNC-037	Ecology and Biodiversity	Protected Species Badgers	The Applicant acknowledges that new setts can appear at short notice and that this might impact on approved construction areas. In such cases the Applicant would need to seek licences to allow any exclusions to be lawfully conducted. The risk of this could be mitigated somewhat with updated contemporaneous survey data, in line with earlier NNC requests, which could allow for detailed site design alterations within the range of flexibility that the Applicant has stated is required, or	The Applicant notes this comment and refers to responses made to NNC-034 and NNC-035.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			earlier interventions to be able to take less impactful badger mitigation measures.	
NNC-038	Ecology and Biodiversity	Protected Species Badgers	The disturbance to badgers is likely to be short-lived and limited to the period of construction. In the context of the landscape surrounding the proposed development sited in the NNC area, there would remain large areas of other suitable land to provide for foraging for the duration of badgers being excluded from areas during construction. The nature of the operation of the site is such that there would be no significant impact on badger foraging habitat longer term. The Applicant has stated that the land would become available for badger foraging immediately after cessation of construction at each site.	The Applicant notes this comment.
NNC-039	Ecology and Biodiversity	Protected Species Badgers	Overall, NNC Ecology does not consider that there would be any harm to badgers taken at a wider community level, and post construction impacts at a local level would be similarly small. The proposed mitigation during construction with the provision of buffer zones around known setts would be adequate if the pattern of setts remains the same but in the three years since the most recent data, this information is already likely to be out of date, and NNC reiterate our concern with the lack of ongoing surveys to be able to inform any detailed design work or amendments required as	The Applicant notes this comment and refers to responses made to NNC-034 and NNC-035.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the proposals proceed towards commencement.	
NNC-040	Ecology and Biodiversity	Protected Species License	While licences may be required despite such additional efforts, but best endeavours should be undertaken to avoid or minimise the reliance on licenced exclusions. In the absence of more recent data, the likelihood of requiring licences to complete works increases.	The Applicant notes this comment and refers to responses made to NNC-034 and NNC-035.
NNC-041	Ecology and Biodiversity	Protected Species Bats	No built structures likely to support roosting bats would be impacted by the proposed development. The Applicant however does consider it likely that there will be the loss of some trees. This, and the potential for construction phase impacts through proximity of site traffic and operation of equipment near to potential roosts sites, means that the application will need to be supported by ongoing surveys and in some cases, the Applicant considers that there will be the need for European Protected Species (EPS) licences to facilitate essential works.	As set out in the OEPMS Revision A [EX1/GH7.5_A], any trees suitable for roosting bats which will require removal would be surveyed by a suitably qualified ecologist in advance of works, to determine the presence or likely absence of bats and the potential need for a protected species mitigation licence. Undeveloped buffer zones have been built into the design, to mitigate against impacts on retained trees with suitability for roosting bats, as detailed in the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. These buffer zones will be demarcated by protective fencing, as detailed in the OEPMS Revision A [EX1/GH7.5_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				This is secured in Schedule 2, Requirement 8 of Draft DCO Revision A [EX1/GH3.1_A] .
NNC-042	Ecology and Biodiversity	Protected Species Bats	The Applicant has stated that the main cause of potential loss of roost sites within trees is where a suitable tree is located in a position – typically in a hedgerow – which lies on the route of the Cable Corridor. This aspect of the works remains amongst the least certain in terms of detail and the Applicant has stated the need for ongoing flexibility for micro-siting the route as development proceeds. This is an area NNC Ecology would like more clarity on at the earliest stage possible, to be able to determine in more detail the specifics of any future impacts.	Once the DCO has been consented and detailed design of the Cable Route Corridor has been completed, further clarification will be provided regarding tree losses. Crossing points where trenchless techniques have been specified are identified in the Crossing Schedule [APP-562]. At all other crossing points, optionality for trenchless (such as HDD) / open-cut trenching is retained, with final construction methodologies to be informed by updated site inspections during the construction phase, as set out in the OEPMS Revision A [EX1/GH7.5_A]. The Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171] includes a number of commitments to avoid tree removal along the Cable Route Corridor wherever possible including: • Micro-siting will be used to avoid the removal or occurrence of root or canopy impacts to veteran trees and Category A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				trees within the Cable Route Corridor. If micro-siting cannot be achieved around such arboricultural features, trenchless techniques such as Horizontal Directional Drilling (HDD) will be used to avoid impacts to veteran and Category A trees; • Tree removal along the Cable Route Corridor will preferentially target trees of lower quality over those of higher quality. Veteran trees and Category A trees will not be removed in the Cable Route Corridor; and • Tree pruning will be specified by an Arboricultural Clerk of Works in collaboration with the construction contractor. Pruning will be minimised wherever possible. Please also refer to the applicant's response to 'NNC-041'. This is secured in Schedule 2, Requirement 8 of Draft DCO Revision A [EX1/GH3.1_A].
NNC-043	Ecology and Biodiversity	Protected Species Bats	As it stands, the Applicant has committed to undertaking all relevant surveys in advance of works with the potential to result in the loss of roost sites. NNC	Once the DCO has been consented and detailed design of the Cable Route Corridor has been completed, any suitable trees for roosting bats



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Ecology, in line with our desire for early notification, request that the identification of 'at risk' trees be completed at least a full survey season in advance of any works/felling required, to be able to get as full a picture as possible of any roost usage.	which may be impacted will be identified. These trees will subsequently be subject to further survey prior to their removal, within the appropriate bat survey season. This commitment is set out in the OCEMP Revision A [EX1/GH7.1_A] which is secured by Requirement 13 of Draft DCO Revision A [EX1/GH3.1_A] .
NNC-044	Ecology and Biodiversity	Protected Species Bats	The proposals would require the opening up of gaps in hedgerows to facilitate access and allow for the laying of the connecting cable in places. This is where potential impact on trees is most likely, but also has the potential to impact on corridors and flight lines of bats. However, the gaps are likely to be restricted in width, and in many cases temporary with the gaps being closed post construction. Such gaps as remain would be consistent with the typical agricultural pattern (gates etc) and not expected to cause long term harm to local bat populations. In addition, the proposed development would provide significant new hedgerow planting, which would compensate for any losses or disruption to the existing pattern.	The Applicant notes this comment, and confirms it is an accurate summary of the Applicant's position in relation to the impacts of hedgerow losses on bats.
NNC-045	Ecology and Biodiversity	Protected Species Bats	The other potential significant effect on bats species would be through the use of site lighting during the construction phase. There will be minimal lighting required	A Lighting Design Strategy will be provided as part of the Detailed Construction Environmental Management Plan and Operational



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			during the operational phase. Nonetheless both operational and construction phase lighting should be accounted for in a Lighting Design Strategy to be approved before construction commences.	Environmental Management Plan as secured by Requirements 13 and 14 of Draft DCO Revision A [EX1/GH3.1_A] . Stipulations with regard to lighting impacts on ecology are set out in the OEPMS Revision A [EX1/GH7.5_A] .
NNC-046	Ecology and Biodiversity	Protected Species Bats	In summary, NNC do not anticipate significant impacts on bats as a result of the proposals, but there remains the possibility of local impacts on individual roosts within trees that may need to be removed as design details emerge on the cable route. NNC urge the Applicant to clarify the route details at the earliest stage possible, to ensure that any points of conflict can be addressed – ideally avoided – with adequate time for minimising impacts. A lighting design strategy will be required to cover construction and operational phases of the work. Additional enhancement measures for bats through the provision of new bat boxes should be provided.	Refer to responses to NNC-041; 042; 043 and 045 in regard to loss of trees and lighting. Provision for bat boxes is made in the OLEMP Revision A [EX1/GH7.4_A] .
NNC-047	Ecology and Biodiversity	Otter and Water Vole	A number of watercourses and water features within the development sites have been ascertained to be suitable for use by otters and water voles, in transit and foraging. The significance of these are considered to be of local importance only.	The Applicant notes this comment. Otters were considered to be of Local Importance in the context of the Scheme, however water voles were considered to be of District



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Importance, owing to their national decline.
NNC-048	Ecology and Biodiversity	Otter and Water Vole	The Applicant proposes that the construction phase impacts be mitigated with buffers along suitable watercourses of a minimum of 10 metres width, which would be adequate to mitigate direct damage as well as disturbance issues. One new culvert may be required in Green Hill F. The Applicant has indicated that they would undertake monitoring prior to any such impacts, and seek licences as required prior to any works being commenced.	The Applicant notes this comment. Protective buffers on ditches and watercourses vary from 8m-30m depending on their size/status, and whether the presence of otters/water voles or other ecological receptors has been confirmed. All other points raised are agreed.
NNC-049	Ecology and Biodiversity	Otter and Water Vole	NNC are pleased to note that the Applicant has indicated new tree planting along watercourses has been set back to allow for more riparian habitats to support water vole populations.	The Applicant notes this comment.
NNC-050	Ecology and Biodiversity	Otter and Water Vole	The greatest potential impacts on Otters and Water Voles arises from construction activities rather than operational ones. The measures proposed to mitigate these risks during construction, as set out in the Outline Ecological Protection and Mitigation Strategy should form the basis of detailed proposals for the avoidance of harm.	Protection and mitigation measures for otter and water vole are set out in the OEPMS Revision A [EX1/GH7.5_A] . These measures will be carried through to the final, detailed Ecological Protection and Mitigation Strategy which is secured in Schedule 2, Requirement 8 of Draft DCO Revision A [EX1/GH3.1_A] .
NNC-051	Ecology and Biodiversity	Otter and Water Vole	Subject to proper protection measures being put in place during construction,	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			NNC are satisfied that no long term harms will arise for Otters and Water Voles as a result of these proposals.	
NNC-052	Ecology and Biodiversity	Biodiversity Net Gain	Biodiversity Net Gain The proposed development, as a NSIP, is not currently subject to mandatory Biodiversity Net Gain (BNG). NNC welcome the efforts made by the Applicant to work with the existing BNG framework, and to have achieved a post development figure for BNG that far exceeds the current mandatory minimum, despite there being no obligation for them to adopt this process. The Applicant has indicated that the net gain proposed is calculated across the whole site rather than being focused on individual land parcels. NNC had hoped that the strategy would instead seek to demonstrate that each parcel would be able to deliver gains on the local level. However, given that the gains proposed across the whole site exceed the minimum threshold with such a large margin, NNC are satisfied that while there will inevitably be variance in the local figures, the proposed post development layout will still achieve the goal of the BNG process to embed gains on site or as local as possible. While the overall site straddles a significant swathe of countryside, the detailed plans show that gains are	The Applicant notes this comment. As per Requirement 9 of Schedule 2 of Draft DCO Revision A [EX1/GH3.1_A] states that a minimum of 10% Net Gains in habitat, hedgerow and river units will be achieved.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			distributed, and so provide a localised outcome, even without this being the focus.	
NNC-053	Ecology and Biodiversity	Biodiversity Net Gain	The level of detail so far shown indicates that the principles of post development habitat creation and enhancement are acceptable. The Applicant has indicated that the final design and layout of the solar sites and supporting infrastructure is still subject to change, and as such the land available for BNG is also subject to change. The principles set out for BNG in the Biodiversity Net Gain Assessment are consistent with the approach taken by other supporting documents such as the Outline LEMP. These principles would enhance the BNG score for Habitats, Hedgerows and Watercourses, and in addition provide ample land to support local badger populations. There is also specific allocation of land to be managed with the SPA priority species in mind as well as well as other fields with similar management that would further reinforce the FLL in support of the SPA priority species. While the final detail of the post development BNG remains to be seen, in light of the non-mandatory status of this aspect of the proposals, as well as the degree to which the 'minimum' gain has been met and exceeded, NNC Ecology	The Applicant notes this comment. As per Requirement 9 of Schedule 2 of Draft DCO Revision A [EX1/GH3.1_A] states that a minimum of 10% Net Gains in habitat, hedgerow and river units will be achieved.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			have no objections to this element of the proposals at this stage.	
NNC-054	Cultural Heritage	Cultural Heritage Summary	Cultural Heritage NNC appointed Senior Built Heritage Advisor has reviewed the submitted DCO documents and provided the following initial comments.	The Applicant notes this comment.
NNC-055	Cultural Heritage	Methodology and Study Area	Methodology and Study Area The methodology and study area are agreed.	The Applicant notes this comment. This agreed matter is reflected in the Draft North Northamptonshire Council Statement of Common Ground [EX2/GH8.3.1]
NNC-056	Cultural Heritage	Designated and Non-designated heritage assets	Scoping of Designated and Non-Designated Heritage Assets There is agreement with regards to those designated and non-designated heritage assets which have been scoped in and taken forward for further assessment.	The Applicant notes this comment. This agreed matter is reflected in the Draft North Northamptonshire Council Statement of Common Ground [EX2/GH8.3.1]
NNC-057	Cultural Heritage	Design workshops	Design Workshops Several virtual design workshops have been held to propose and discuss potential embedded mitigation.	The Applicant notes this comment.
NNC-058	Cultural Heritage	Designated and Non-designated heritage assets (Sites C, D and E)	Response to Environmental Statement – Sites C, D and E The proposed solar array to Sites C, D and E have the potential to impact designated and non-designated heritage assets in and around the settlements of Mears Ashby, Sywell, and Earls Barton.	The Applicant notes this comment. ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] identified that there would be less than substantial harm (or low to medium adverse impact) to several



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Several fields within and near to the Sywell Aerodrome have now been omitted from the scheme. This will remove any direct impacts to the cluster of non-designated heritage assets within this area and greatly reduce any indirect impacts to the heritage assets. The omission from the scheme of a field to Site D, the increase of development setbacks from Highfield Road, and the proposed enhancements to the existing field boundaries will also mitigate harm to the settlement and Conservation Area of Mears Ashby including several designated and non-designated heritage assets in and around the settlement. Further mitigation measures proposed to Site E will also reduce harm to the settlement and Conservation Area of Mears Ashby, as well as the designated and non-designated heritage assets in and around the settlement. These measures include the omission of several fields from the scheme (some for archaeological reasons), an increase in development setbacks in order to retain open and agrarian settings of the assets, the introduction of new tree belts to field boundaries, and the enhancement of existing landscape screening (particularly along Mears Ashby Road).	heritage assets as a result of the development on Sites C, D and E. It was identified that the significance of effects would be Moderate/Minor adverse, which is not considered significant. It was identified that there would be a Moderate adverse effect to the Mears Ashby Conservation Area (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]) following mitigation. Mitigation is proposed in the form of removal of solar panels from Fields DF4, EF9, EF16, EF34, Offsets (Fields DF1 to DF3, EF4 EF5, EF10-EF15, EF17) and enhanced screening of existing hedgerows and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			In response to harm being identified to heritage assets in and around Earls Barton, at least two fields have been omitted from the scheme (for heritage and landscape reasons) which will partially mitigate this harm. Despite the proposed mitigation measures, the proposed solar arrays to Sites C, D and E will result in residual 'less than substantial harm' to several heritage assets, as outlined within the submitted ES.	
NNC-059	Cultural Heritage	Designated and Non-designated heritage assets (Sites F and BESS)	Response to Environmental Statement – Site F and BESS The proposed solar array to Sites F and the BESS Site has the potential to impact the settlements of Castle Ashby, Grendon, Bozeat, and Easton Maudit including several designated and non-designated heritage assets in and around these settlements. The harm arising from the scheme has been partially mitigated through a reduction in the density of the proposed solar arrays, the retention of a 'green corridors' and intervisibility between Grendon and Easton Maudit through the omission of several fields from the scheme, enhancement of trees and vegetation along Easton Way, and the introduction of development breaks around Easton Maudit.	The Applicant notes this comment. ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] identified that there would be less than substantial harm (or low to medium adverse impact) to several heritage assets as a result of the development on Site F. For the majority of assets It was identified that the significance of effects would be Moderate/Minor adverse, which is not considered significant. Moderate adverse effects were identified to the Grade I Listed Church of St Peter and St Paul (NHLE 1189610) and Grade II* Listed 22 High Street (NHLE



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Further mitigation measures include the enhancement and infilling of existing tree belts along Station Road and the boundary of the Castle Ashby Registered Park and Garden. Despite the proposed mitigation measures, the proposed solar arrays to Site F and the BESS Site will result in residual 'less than substantial harm' to several heritage assets, as outlined within the submitted ES.	1040784). It was also identified that there would be a Moderate adverse effect to the Mears Ashby Conservation Area (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]) following mitigation. Mitigation is proposed in the form of removal of solar panels from Fields FF9, FF13, FF14, FF16, FF22, FF27 and FF28, and offsets in Fields FF11, FF15, FF19 and FF26. Enhanced screening of existing hedgerow and tree belts. A visual corridor has been retained between Grendon and Easton Maudit conservation areas. A visual corridor has also been retained between churches (including along PROW) and enhanced screening of existing hedgerow and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area.
NNC-060	Cultural Heritage	Designated heritage assets	There is agreement that there is residual 'less than substantial harm' to a number of heritage assets arising from the scheme. It is considered that the scheme will result in less than substantial harm to:	The applicant notes this comment and would welcome undertaking a site visit with the Conservation Officer. The Applicant agrees that the Scheme will result in less than



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			– Grade II listed Station Lodge (LEN: 1294156) – Grade II listed Low Farmhouse (LEN: 1371681) – Grade II listed 10, High Street (LEN: 1040783) – Grade II listed Limes Farmhouse (LEN: 1189643) – Grade II listed The Old Farmhouse (LEN: 1189658) – Grade II listed Barns Attached to South of Manor Farmhouse (LEN: 1371682) – Grade II listed Manor Farmhouse (LEN: 1189637) – Grade II* listed 22, High Street (LEN: 1040784) – Grade II listed Number 25 (Old School House) and Number 26 (LEN: 1371683) – Grade II listed Well House (LEN: 1294160) – Grade I listed Church of St Peter and St Paul (LEN: 1189610) – Grade II listed The Old Vicarage (LEN: 1040782) – Grade II listed Park Farmhouse (LEN: 1189605) – Grade II listed Home Farmhouse (LEN: 1040785) – Grade II* listed Church of All Saints (LEN: 1040692) – Grade II listed The Old Farmhouse (LEN: 1371722) – Grade II listed Crabtree Cottage Dale Farm Cottages (LEN: 1191402) – Grade II listed 5, Duchess End (LEN: 1191195) – Grade II listed The Cottage (LEN: 1287024) – Grade II listed Village Farmhouse and Attached Barns and Cartsheds (LEN: 1040702) – Grade II listed Low Farmhouse (LEN: 1371681) – Easton Maudit	substantial harm to the assets listed with the exception of Grade II* listed Church of All Saints in Mears Ashby (NHLE: 1040692). While the Church of All Saints derives some very limited significance from agricultural fields surrounding Mears Ashby in the broadest sense, any impacts will largely be minimised by the removal of panels from fields nearest to the village. Overall, the Church of All Saints will maintain its overall architectural and aesthetic prominence and the Scheme will result in no harm (see Pages 31 and 32 of ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]).



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			Conservation Area – Mears Ashby Conservation Area It may be that additional harm, and therefore further mitigation measures, are identified and recommended following additional site visits and throughout the examination process.	
NNC-061	Cultural Heritage	Cultural Heritage Conclusion	Given the geographical scale of the proposed scheme as well as the cumulative impact arising from multiple sites of development (particularly around Mears Ashby), it is unlikely that the identified harm can be wholly mitigated without significantly reducing the proposed quantity of solar panels.	The Scheme design has been established with particular consideration to reducing impacts to heritage assets. Where impacts from the Scheme cannot be completely mitigated (i.e. in fields adjacent to Mears Ashby), The assessment has identified that there will be a level of harm (identified as being at the lower end of less than substantial harm – see ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]). It is considered that the public benefits of the Scheme outweigh this harm.
NNC-062	Cultural Heritage	Archaeological Non-Intrusive	NNC Archaeology Officer has reviewed the submitted DCO documents and provided the following initial comments. The assessments undertaken to date are at the level expected and the interim trial trenching reports are acceptable. The Applicant's consultants were using some further non-intrusive techniques for areas which have not been subject to trenching,	The Applicant welcomes this comment. The Applicant considers the archaeological evaluation assessments to be proportionate and in line with appropriate policy, standard and guidance. The Applicant has looked to work with the NNC Archaeological Officer



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			but the results for that are not yet available. NNC Archaeology Officer has indicated that geophysics alone is not normally sufficient and needs to be backed up by other techniques. However as there has been some willingness to try new techniques NNC are happy to wait for those results and see whether any new trenching targets are identified. This will need to be reviewed throughout the examination process.	to identify an appropriate level of assessment and has welcomed discussions to maximise the information attained from non-intrusive evaluation techniques. The Applicant looks forward to continuing these discussions and looking to agree a statement of common ground during the examination period.
NNC-063	Cultural Heritage	Archaeological mitigation	NNC will have questions about proposed mitigation strategies, primarily around preservation in situ as the proposals for strip/map/sample and monitoring are not controversial. However NNC will want to know more about any areas of preservation which are to be used as ecological enhancement as that can have a detrimental impact on archaeological levels and those areas might therefore not be preserved as well as anticipated.	The Applicant is currently discussing the mitigation strategy with NNC. In particular identifying construction methods that would enable identified archaeological assets to be preserved in situ. The Applicant notes NNC comments regarding ecological enhancements having an archaeological impact and mitigation for these areas is set out in the OCEMP Revision A [EX1/GH7.1_A] . As outlined in the OOEMP Revision A [EX1/GH7.2_A] no works relating to the solar development are permitted in the areas of no development during the operation phase. Where ecological mitigation is proposed this should not include any ground disturbance beyond baseline conditions (i.e. scrapes or



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				ponds) and where practicable should look to minimise impacts caused by arable land usage (i.e. deep ploughing).
NNC-064	Cultural Heritage	Decommissioning	The outline decommissioning strategy is noted, however NNC would also want to know if there will be a strategy for likely repair/replacement during the life of the installation.	Section 12.4 of ES, Chapter 12: Cultural Heritage [APP-049], outlines the operational phase of the Scheme, during which no further direct adverse effects on buried archaeological remains are anticipated. Should works be required during operation that have the potential to affect buried remains, these would be subject to assessment to determine the extent of impact and appropriate mitigation, in accordance with the OOEMP Revision A [EX1/GH7.2_A]. The OOEMP sets out the timeframes for planting and management responsibilities for the duration of operation, including replacement planting, as well as a schedule of monitoring. Replacement of panels will also be replaced on existing frames so there will be no disturbance to the topsoil.
NNC-065	Transport and Access	Transport and Access Summary	NNC as Local Highway Authority (LHA) has been involved in a number of meetings with the Applicant pre-submission. The submitted highway details record and update those pre-application discussions.	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The LHA have reviewed the proposed site construction accesses within the NNC jurisdiction boundary and the relevant Construction Management Plan.	
NNC-066	Transport and Access	Additional Highway Design	The LHA are still in discussion with the Applicants on matters relating to access arrangements and suitable visibility, construction traffic routing and the potential for temporary passing places associated with this. NNC consider these to be the more prevalent highway related considerations. NNC require additional information relating to some of the site accesses and some vertical visibility splays along with consideration for traffic management for various accesses. Many of the access drawings are based on ordnance survey mapping at this stage and there is obviously a lack of much detail.	The Applicant is in discussions with the Council to progress the preparation of further material which covers these matters and will be agreed within the Draft North Northamptonshire Council Statement of Common Ground [EX2/GH8.3.1] .
NNC-067	Transport and Access	Abnormal Loads	The LHA note that abnormal loads are planned for the construction phase - access may pose an issue around Sites C, D and associated unclassified roads due to restricted width.	An assessment of abnormal Load movements for the Scheme, including movements to Sites C and D is provided in the ES Appendix 13.2 Transport Assessment [APP-151 to APP-153] . The analysis presented includes swept path drawings of key areas indicating how the movements of abnormal loads might affect the road network.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NNC-068	Transport and Access	Public Rights of Way	The Council will make comments in relation to Public Rights of Way in the LIR.	The Applicant notes this comment.
NNC-069	Agricultural Land Use	Agricultural Land Use	Agricultural Land Use Chapter 20 considers the findings of the likely significant environmental effects of the Scheme in relation to agricultural circumstances. The majority of the land in the Scheme is agricultural (arable), with the sensitivity of Grade 1 and 2 land classified as Very High, Grade 3a as High, and Grade 3b as Medium and Grade 4 as Low. As agreed at PEIR stage, further studies have been carried out which identify that there are six major soil types across the Sites. Soil type 1 is the dominant soil, covering the majority of the Sites and Cable Route, while the other five identified soil types cover only small areas. In regard to Green Hill Sites C, D, E, F, BESS and the Cable Route Corridor, the Agricultural Land Classification (ALC) spans Grades 2, 3a and 3b. This is not disputed.	The Applicant notes this comment.
NNC-070	Agricultural Land Use	Agricultural Land Use Temporary Use	It is agreed that given the nature of the proposed development, any potential effects are temporary and reversible, as the majority of the Sites and Cable Route Corridor will be returned to their original use and condition as far as practicable after construction and decommissioning. It is noted that post-decommissioning, the landowners may return the Sites to arable	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			use, and NNC would support Requirements that ensure that established habitats, such as hedgerows and woodland, be retained. It is noted that sheep grazing can still occur post construction phase and that careful consideration has been given to the location of associated infrastructure and any hardstanding within each Site, avoiding the Best and Most Versatile (BMV) land. This is supported.	
NNC-071	Agricultural Land Use	Soil Management	A Construction Management Plan and a Soil Management Plan is proposed to ensure appropriate soil movements/storage take place during construction. The need for this to be secured as a Requirement is agreed.	An outline Soil Management Plan has been prepared to set out the soil management strategy, approach and key measures during construction, operation and decommissioning stages. The OSMP [APP-550] will be further developed into a detailed Soil Management Plan along with the results of Soil Resource Survey to be conducted at the Cable route as secured in Schedule 2, Requirement 19 of the Draft DCO Revision A [EX1/GH3.1_A] .
NNC-072	Hydrology, Flood Risk and Drainage	Surface Water, Flooding and Drainage	The Council in its capacity as Lead Local Flood Authority (LLFA) has reviewed the application documents for this proposal. The LLFA have previously been consulted on several parts of the wider proposal. Some queries were raised, and in certain responses, it was noted that these would	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			be addressed at the detailed design stage, once fixed layouts are available.	
NNC-073	Hydrology, Flood Risk and Drainage	Flood Risk Assessment	The LLFA considers that the submitted Flood Risk Assessment and Drainage Strategy are mostly satisfactory and agree that the detailed information may be submitted at the next planning stage (i.e via Requirements). In summary, the below information will be required at detailed design stage: 1. Submission of detailed drainage plan, clearly showing all proposed drainage elements and referencing supporting calculations. This should include correctly reference pipe and manhole details. A qualitative assessment of system failure should also be included, demonstrating that flood water would follow safe flow routes without endangering property or blocking emergency access. 2. Submission of full WinDES modelling (or equivalent) showing proposed discharge rates and simulation of storm events across the drainage system. Results should confirm no surcharge during a 1 in 1-year event, no above-ground flooding during a 1 in 30-year event, and that any flooding in a 1 in 100-year event (with climate	The Applicant welcomes the LLFA's confirmation that the ES Appendix 10.1: FRADS Report Revision A [EX1/GH6.3.10.1_A] is broadly satisfactory. The FRA and its supporting annexes FRADS Annexes A–J [APP-098 to APP-108] establish a strategic scheme-wide approach, identifying discharge locations, greenfield runoff rates, attenuation requirements and embedded mitigation. Detailed hydraulic design will be progressed post-consent, secured through Requirement 11 of the Draft DCO Revision A [EX1/GH3.1_A] and to be approved by the relevant planning authority in consultation with the LLFA. The submission documents already set out the scope of that detailed work. The ES Appendix 10.1: FRADS Report Revision A [EX1/GH6.3.10.1_A] confirms that drainage will be based on a sustainable system of swales, ditches and attenuation basins (see Section 6). At detailed design, full layout drawings, pipe/manhole schedules and calculations will be provided, with exceedance routing



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			change allowance) is safely managed in designated areas away from buildings and critical infrastructure. 3. All development proposals must explain the drainage discharge hierarchy. If there are changes to the existing strategy, the method of surface water discharge must be clearly outlined and justified based on site conditions and the hierarchy. If infiltration is proposed, evidence such as BRE 365 test results will be required to confirm sufficient permeability. If discharging to an existing watercourse or drainage feature, evidence must show that post-development flows will not exceed current levels, or the system can safely accommodate the additional discharge without increasing flood risk.	assessments showing safe conveyance of flows without affecting property or emergency access. The ES Appendix 10.1: FRADS Report Revision A [EX1/GH6.3.10.1_A] (Section 6.6) sets the performance standards to which the network will be designed. To support the application, Causeway Flow calculations have been provided in the annexes (for example FRADS Annex E: Green Hill C Revision A [EX1/GH6.3.10.6_A], Annex D). These demonstrate that runoff rates and attenuation volumes can be achieved in line with policy. At the detailed design stage, these calculations will be refined and expanded through full hydraulic modelling (e.g. WinDES or equivalent) to confirm no surcharge in the 1 in 1 year event, no above-ground flooding in the 1 in 30 year event, and safe management of the 1 in 100 year plus climate change event within designated storage areas. The drainage hierarchy has been applied in the ES Appendix 10.1: FRADS Report Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				[EX1/GH6.3.10.1_A] (Table 6.2). Infiltration is not generally viable due to soil and groundwater conditions, as confirmed in ES Chapter 22: Ground Conditions and Contamination Revision A [EX1/GH6.2.22_A] and the OSMP [APP-550]. Accordingly, discharges will be made to adjacent watercourses where available, restricted to 70% of the greenfield rate for the 1 and 2 year events and to the greenfield rate for higher return periods, consistent with LLFA policy. Where infiltration remains a potential option, BRE 365 testing will be undertaken at detailed design to confirm feasibility. Where discharges are to watercourses, the final designs will evidence that flows do not exceed agreed rates and that receiving channels have capacity. These requirements are secured by the OCEMP Revision A [EX1/GH7.1_A] and Requirement 11 of the Draft DCO Revision A [EX1/GH3.1_A], providing the mechanism for the LLFA to review and approve detailed designs prior to construction. This ensures that the principles in the submitted FRA are



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				carried forward into final drainage layouts and calculations.
NNC-074	Minerals and Waste	Mineral Resource Assessment	The Council in its capacity as Minerals and Waste Planning Authority has reviewed the application documents for this proposal. The comments are as follows; the Mineral Resource Assessment has fully considered the potential mineral resource impacts of the scheme during the construction, operation and maintenance, and decommissioning phases. The embedded and additional site-specific mitigation measures to safeguard mineral resources (summarised in Table 11.6) should be fully implemented. Subject to these measures, the Minerals Planning Authority is satisfied that Policy 28 (Mineral Safeguarding Areas) and Policy 30 (Preventing land use conflict) of the Minerals and Waste Local Plan has been met.	The Applicant notes this comment. Mitigation measures are secured within the OCEMP Revision A [EX1/GH7.1_A], and OOEMP Revision A [EX1/GH7.2_A], which are secured by Requirement 13 and 14 respectively in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
NNC-075	Ground Conditions Air Quality Noise	Environmental Protection	NNC Environmental Protection Team has reviewed the submitted documents in relation to Environmental Protection and with respect to environmental impacts. Detailed reports have been submitted covering the following: • Land condition • Air quality • Noise and vibration	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Lighting • Construction management NNC note that many of these are overarching documents will have daughter documents for each individual parcel of land secured via Requirements. At this point in time NNC have no further comments or disagreement with the proposals in regard to the above mentioned Environmental Protection matters.	
NNC-076	Landscape Ecology and Biodiversity Socio-Economics	Effects on Public Amenity and Recreation	Following on from the pre-application stages, it is noted and supported that the infrastructure has been further offset from residential areas to reduce amenity impact, such as possible glare and construction noise etc impact. Mitigation measures includes buffers from roads, additional PRow and ecological enhancement fields between the infrastructure and built-up areas.	The Scheme has been designed to minimise direct impacts on residential properties by offsetting a minimum of 50m between the property boundaries of any residential areas and where solar panels are to be placed. This offset area will also be planted to protect long-term privacy and amenity for residential properties. Offsets from roads to the Scheme are largely defined by buffers to hedgerows of 15 m, or to ditches at 8-9 m. PRow benefit from a 15 m buffer from the centreline of the PRow to any onsite infrastructure (with fencing generally 8-10 m from PRow). These distances are set out in the CDPP Revision A [EX1/GH7.17_A] , and secured by Requirement 5 in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Schedule 2 to the Draft DCO Revisions A [EX1/GH3.1_A]. Buffer spaces are largely to be planted with tussocky grass to create generous field margins for the benefit of ecology and biodiversity and amenity of highway and PROW users. This, and additional enhancement to hedgerows are committed to in the OLEMP Revision A [EX1/GH7.4_A]. These measures are secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Additional measures to ensure construction and operational effects to residential amenity and amenity of highway and PROW users are minimised through the OCEMP Revision A [EX1/GH7.1_A], and OOEMP Revision A [EX1/GH7.2_A], which are secured by Requirement 13 and 14 respectively in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
NNC-077	Human Health	Direct Impacts	The direct impacts on health includes increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests. The ES and	The Applicant confirms that consideration of the health impacts of increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			supporting documents identifies measures to avoid, reduce or compensate for these impacts in the form of an Outline CEMP, to manage the construction process and impacts, an Outline Construction Traffic Management Plan to offset construction from PRowS and control HGV routing and numbers, a Construction Dust Management Plan to reduce vehicular emissions, an Outline Operational Environmental Management Plan, an Outline Operational Traffic Management Plan and an Outline Battery Storage Safety Management Plan. NNC agree that final detail of the above mitigation measures should be secured by way of Requirement for each Site within the proposed development area. It is agreed that the majority of impacts result in adverse effects on amenity, however they are temporary and if mitigated, then not significant.	exposure to radiation (in the case of this Scheme extremely low frequency electromagnetic fields) has been undertaken as part of the assessment in ES Chapter 18: Human Health [APP-055] and finds no significant adverse effects subject to implementation of mitigation. Increase in pests has been assessed in ES Chapter 23: Major Accidents and Disasters [APP-060] and finds no significant adverse effects subject to implementation of mitigation. The Applicant furthermore confirms that the mitigation and management documents identified are each secured by requirement in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. (A Dust Management Plan is secured through the OCEMP Revision A [EX1/GH7.1_A].)
NNC-078	Human Health Socio-Economics	Public Rights of Way	NNC support the proposed additional PRow network around and within the Sites and the addition of this would lead to a positive health impact for users. NNC will make any further comments on public amenity and recreation through the LIR.	The Applicant confirms that the Scheme includes permissive paths for pedestrians, and for equestrian users, as set out by Work No.10 in Schedule 1 of the Draft DCO Revision A [EX1/GH3.1_A] and as shown on the Works Plan Revision B [EX1/GH2.4_B] .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Applicant agrees that these can lead to an improvement to PRoW network connectivity and thus on health and wellbeing through improved access to the countryside, and has considered this in the assessment in ES Chapter 18: Human Health [APP-055] .
NNC-079	Socio-economics	Crime	Crime Prevention Northamptonshire Police have reviewed the DCO submission documents and raise the following points and recommendations to reduce the opportunities for crime arising as a result of this development. Background 71% of all crime committed in the renewable energy sector takes place on solar farms. The cable is stolen for its scrap value - on average 14.7km per theft and the panels stolen for their resale value - on average 106 panels per theft. Between 2022 and 2023 this cost operators 2.2million pounds with some sites being targeted multiple times. There has been an increase of 29% of reported solar crime in 2024 compared to 2023 with a 40% increase of solar cable theft. Panel theft has decreased by 30%. In any event crime on solar farms is lucrative for criminals. The crime is perpetrated by OCG's (Organised Crime Gangs) who are highly motivated, well organised groups prepared to use violence. Access to the site is	The Applicant notes these comments and understands the operational risks regarding crime impacting on solar infrastructure.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			usually via the perimeter fence by ramming or cutting through the fencing and rarely is the main gate used. Crimes are committed at night when it is less dangerous and are usually pre planned.	
NNC-080	Socio-economics	Crime Scheme Design	Environmental Statement Chapter 4: Scheme Description mentions Security This appears to be generic and not site specific. For example, fencing around the site will be Deer Proof Fencing wire mesh and wooden post fencing with a maximum height of 2.5 metres. However Northamptonshire Police would expect each site to have site specific security, for example where the site is near to a road or has easy access to a road the fencing should be more robust security level weldmesh fencing and robust planning, ditch and bund should also be considered. Northamptonshire Police expect to see a layered approach to site security being demonstrated by the Applicant in the DAS or within a Crime Prevention and Security Statement. Although some information has been provided, it is expected to see site specific information for each site area.	The Applicant confirms that site-wide security measures have been set out in ES Chapter 4: Scheme Description [APP-041] including site fencing, gates, CCTV, and security for construction compounds. The Scheme proposes to use fencing in tandem with enhancement to boundary features such as ditches and hedgerows along roads to provide natural defences. Further site-specific detail on these measures is to be provided in the detailed CEMP and OEMP as secured by Requirements 13 and 14 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Requirement 10 also requires the approval of proposed temporary and permanent fencing and other means of enclosure.
NNC-081	Socio-Economics	Crime Prevention and Security Statement	A full Crime Prevention and Security Statement should be provided detailing the layered approach to security the Applicant proposes to reduce opportunities for crime on site and how any activations on site will	The Applicant has committed to providing detailed security information in the detailed CEMP and OEMP as secured by requirement in Schedule 2 to the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			be dealt with (during construction and for the lifetime of the development). Included in this, it would be helpful to have information about the CCTV monitoring station, who responds to any activation and from where. A block plan showing the arcs of coverage per CCTV camera, whether the CCTV cameras are PTZ or static - what analytics (if any) are on the fence line, what is the height of the camera, etc. All CCTV should be monitored and Infra-red cameras around the perimeter supplemented with covert cameras within the site. Signage warning of the use of CCTV should be installed on the perimeter fencing/gates. Consideration should be given to the use of portable intruder detection (PID) surveillance units which combine 360degree visual coverage 24/7 monitoring of the site and have a loud decibel audio warning system.	Draft DCO Revision A [EX1/GH3.1_A] . These can include details on CCTV operations for the solar array areas (which are anticipated to be monitored remotely by infrared CCTV cameras with fields of view directed inward and along the site perimeter) and for onsite infrastructure (such as substations, BESS and inverters) where there is a danger to life if improperly accessed.
NNC-082	Socio-Economics	Crime Scheme Design	Ditches and bunds should be considered to make it more difficult for large vehicles to access the site via open ground (often the preferred method of approach rather than the main gate). Site boundaries and fencing should be supplemented with dense defensive planting to make breaking through the fence line more difficult. There should be a buffer zone between the fence line and the panel array to ensure the panels have to be moved some	The Scheme seeks to utilise existing ditches and enhanced dense vegetation along the Scheme's boundaries to provide natural defence and deterrence. This includes closing existing gaps in hedges to provide more robust defences (as much as providing landscape and ecological benefit as set out in the OLEMP Revision A [EX1/GH7.4_A]).



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			distance into any vehicle parked outside the fence line. The panels and cabling should be overtly and covertly marked (with a forensic marking product) and this should be widely advertised around the perimeter. Secure doors on the control rooms, etc should be certificated to security standard LPS 1175 SR2 or equivalent and be 3rd party accredited products. Appropriate security locks should be installed on all equipment cabinets, storage containers, etc. Where battery storage areas are introduced, they should be protected by paladin/weldmesh fencing and gates to security standard LPS 1175 SR2 or equivalent and be third party accredited products. It is agreed that the above recommendations could be secured via Requirements.	The Scheme has a minimum 5 m buffer between site fencing and solar panels. This space will be central to CCTV field of view to deter trespass. Specific product crime prevention measures as suggested are welcomed, and can be included in detailed security measures, or as part of detailed product specification prior to construction.
NNC-083	Socio-Economics	Socio-Economics	NNC will make any relevant comments in the LIR and written submissions, as necessary.	The Applicant notes this comment.
NNC-084	Planning Obligations Community Benefits	Community Benefits	The submission documents state that the Applicant proposes to establish and set up a Community Liaison Group (CLG). The purpose of the group is to enable local community representatives to have a formal channel for monitoring and influencing the construction, operational and decommissioning aspects of the Scheme. Furthermore, the CLG is intended	The Applicant notes this comment and welcomes any liaison with the community. Requirement 4 as set out in Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A] sets out the commitment to the delivery of the CLG.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to provide an opportunity for regular and formal dialogue between the Applicant and the local community's representatives in relation to the construction and operational aspects of the Scheme. It is noted that the delivery of the CLG will be secured via a Requirement of the DCO and this is agreed.	
NNC-085	Planning Obligations Community Benefits	Community Benefit Fund	A Community Benefit Fund (CBF) is also proposed, however the submission documents state that the CBF does not form part of the DCO application, and this funding (to fund local community projects) is not required to mitigate the impacts of the Scheme. This is not agreed, NNC consider that a CBF is required to mitigate the impacts of the development and should be secured as part of the DCO process. A CBF can assist in delivering lasting benefits to the local community, such as improving more local landscape buffers outside of the Sites boundaries but in close proximity to villages, to enable education opportunities within local schools regarding renewable energy, support local sustainability/ecological programs etc. NNC are keen to explore the CBF, what it could provide and how it can be secured during the life of the development. NNC are also keen to ensure that during the decommissioning stage, suitable	Efforts to provide specific benefits in locally impacted communities are set out in the OSSCEP [APP-552] (for employment and economy), in the OLEMP Revision A [EX1/GH7.4_A] (for landscape and ecological improvements) and through the provision of direct onsite community benefits such as new permissive access routes. Additional voluntary, or other types of benefits that do not directly relate to the Scheme, are therefore to be delivered through the community benefit fund, hence its separation to the DCO process. The Applicant is committed to ensuring that communities benefit from the Scheme including by receiving direct funding to important causes in the local area. During the development of the proposals for Green Hill Solar Farm, we have consulted on community benefits



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			funding is secured (eg a sinking fund or bond) to secure remediation of the Sites. NNC will make any further relevant comments in the LIR and written submissions, as necessary.	and, based on feedback, will determine how best to distribute funding. The Scheme will also generate business rates that are paid to the local authority. In respect of decommissioning, Requirement 21 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. The Applicant notes that there is no policy requirement for a decommissioning fund to be imposed and paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments. The Applicant considers that Requirement 21 complies with paragraphs 2.10.146 to 2.10.148 of NPS EN-3. The Secretary of State has considered this point in previous decisions for solar projects under the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Planning Act 2008 and determined that imposing a decommissioning fund requirement is not necessary.¹ This is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed.
NNC-086	Draft Development Consent Order	Requirements Management Plans	Mitigation (including Requirements and other control documents) A key concern for NNC will be, should the GHSF be consented, the mechanisms that will mitigate and control the impacts of the scheme. NNC will seek to ensure that all impacts on the environment and communities are mitigated and controlled and not solely those deemed 'significant' in terms of the Environmental Impact Assessment. NNC expect the Applicant to deliver measures that mitigate all impacts to ensure that the overarching impact of the project is mitigated as far as possible.	Within each chapter the Applicant provides an overview of how the mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives. ES Chapter 27: Commitments Register [APP-064] sets out the environmental mitigation measures which are proposed to be adopted during the construction, operation and maintenance, and decommissioning phases of the Scheme.
NNC-087	Draft Development	Draft Development Consent Order	At this stage the Council reserves its position on the relevant parts of the draft DCO including the proposed requirements	The Applicant notes this comment.

¹ For example, see paragraphs 4.44 and 4.45 of the Secretary of State's Decision Letter for the Oaklands Farm Solar Park



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Consent Order		which are likely to be needed to be amended or added to as the examination progresses. The Council wishes to participate in any Issue Specific Hearing in relation to the drafting of the DCO.	
NNC-088	The Scheme	Summary of Representation	As a host authority and IP for the project NNC will be taking a full and active role in the examination of DCO application. This RR provides a summary of the issues which NNC currently agrees/and or disagrees with together with an appropriate explanation. In summary an outline of the principal topics which NNC intends to address in relation to the application during the examination will cover the following:- • Policy Compliance • Landscape and Visual Impact • Ecology and Biodiversity Impacts • Cultural Heritage • Highways and Transportation • Agricultural Land Use • Surface Water, Flooding and Drainage • Minerals and Waste • Environmental Protection	The Applicant notes this comment. Where points have been raised in this relevant representation the Applicant has responded to them in NNC-001 to NNC-087.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Effects on Public Amenity and Recreation • Crime Prevention • Socio-economic • Planning Obligations/Community Benefits NCC confirms that it wishes to attend the preliminary meeting to discuss how the application should be examined and that it will take an active part in the examination of the application thereafter. Please note that the comments supplied in this RR are based on the information supplied to date and are without prejudice to any views that may be expressed in its LIR or WR.	



2.3 West Northamptonshire Council

Table 2.3: [RR-1251](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WNC-001	General	Status of West Northamptonshire Council	Following the Planning Inspectorate's confirmation that the above project has been accepted as an application for a Development Consent Order (DCO) to construct the Green Hill Solar Farm, West Northamptonshire Council (WNC) (the Council), as a host authority, requests to be registered as an Interested Party at the Examination. In this Relevant Representations the Council set out what it currently identifies as the key issues relating to the project based on an initial review of the extensive DCO application material. The Council confirms that it intends to submit a Written Representation in addition to a Local Impact Report providing a more detailed case following the completion of a full technical assessment of the submitted details and the resolution of WNC Council Members. These documents will expand upon the importance of each issue, and will assess them against the relevant policy framework to provide a position on the overall planning balance (acceptability) of the project.	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			This Relevant Representation is therefore submitted without prejudice to the view that may be expressed within the Council's Local Impact Report and Written Representation. The Council will set out its position in respect of the application in the Local Impact Report and Written Representations. The assessments therein will have regard to the following: • Primary and Secondary legislation • Relevant National Policy Statements • National Planning Policy Framework • The Statutory Development Plan for West Northamptonshire • National Infrastructure Planning Guidance • Representations from other parties including consultees This Relevant Representation sets out in summary, the Council's current view in respect of the following matters: • Landscape and Visual Impacts • Heritage Impacts	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			- Highway Matters - Ecology Impacts	
WNC-002	The Scheme	Scheme Location	Landscape and Visual Impacts The sites associated with this proposal are located in both West Northamptonshire and North Northamptonshire Councils with three sites A, A2 and B located in West Northamptonshire Council's (WNC) administrative boundary. Site A is located north of Walgrave and immediately east of Old while A2 is located north east of the same village, while B is located south of the village of Holcot. The two A sites sit in an agricultural landscape with a strong field network defined by hedgerows and associated hedgerow trees including a number of well-established significant trees. The landform is gently rolling which allows the established hedgerows to often interrupt any distant views. Site B also sits in similar gently rolling landscape but the hedgerows appear slightly less established and the views in particular from Sywell Road are more extensive.	The Applicant has set out the Schemes location in ES Chapter 3: The Development Site Revision A [EX1/GH6.2.3_A]. A detailed description of each individual Site is contained within Section 8.6 of ES Chapter 8 Landscape and Visual Impact [APP-045].
WNC-003	Landscape and Visual	Visual Effects Views	Public views of the proposed sites are from the surrounding road network and any footpaths/bridleways that are in the immediate vicinity or bisect the site. Site A is viewed by three roads, the closest being Newland Road that	The Applicant notes this comment. A detailed description of each individual Site is contained within Section 8.6 of ES Chapter 8



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			bisects the site but generally due to the strong roadside hedgerows including trees views of the adjacent fields are limited to gateways, occasional gaps or where hedgerows are maintained at a lower level. The current best views are from Broughton Road as it heads east away from Old as the hedges appear to be maintained. generally at a lower height. Finally Walgrave Road heading north west from Walgrave to Old is located a field south of the site and the roadside hedge is well established and generally maintained at a higher level and includes a high percentage of emerging trees. Though there are no public footpaths that cross the site or are nearer than the aforementioned roads, there is a green lane that heads north from Newlands Road north of the Acorn Centre and runs the equivalent of 4 fields into the site. It is characterised as a grass lane between two hedges including a number of significant mature hedgerow Oak trees that has been identified by locals as well used to walk.	Landscape and Visual Impact [APP-045]. Furthermore, the Applicant confirms that the green lane from Newland Road has been included in the Scheme as part of a permissive route for pedestrian and equestrian users, as shown on the Works Plan Revision B [EX1/GH2.4_B] and ES Figure 4.10 Landscape and Ecology Mitigation Plan A [APP-207] . This therefore acts to enhance accessibility for recreation by linking back to Broughton Road and Newland Road, providing opportunity for a circular no- or low-traffic route for users of the Acorn Centre or from Walgrave.
WNC-004	Landscape and Visual	Site Description Visual Effects Views	Where views are possible through gaps and where hedges are currently maintained at a lower level gaps should be filled and hedges can be maintained higher or allowed to grow unchecked though that could ultimately impact	The Applicant notes this comment. The OLEMP Revision A [EX1/GH7.4_A] prescribes how the landscape and ecology mitigation measures identified and proposed



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			upon the nearest solar panels due to extended shade as hedges revert to trees. There is a general indication that the hedges will be maintained at a height of 4m that would certainly limit views of the proposed panels. It would appear that reinforcement of roadside planting is indicated along the southern boundary along Broughton Road and Newland Road where it bisects the site on the indicative masterplan which would be beneficial visually regarding mitigation of views of the panels. There is also importantly the indication of the retention of the existing hedges to be incorporated into the proposed layout.	would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives of the landscape mitigation. The OLEMP includes a commitment to maintain hedgerows to 4.5m. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A]. The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A]. Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064].
WNC-005	Arboriculture Ecological and Biodiversity Transport and Access	Tree Protection Hedgerow gaps	There is an indication of establishment of a Green Corridor along the line of the existing Green Lane with additional native tree planting to connect the existing network of trees which would provide additional layering of vegetation. The Arboricultural Impact Assessment and Outline Arboricultural Method Statement Plans provide a detailed indication of how the existing	The Applicant agrees with this summary comment. The green lane from Newland Road is proposed for enhancement with additional native tree planting as shown in ES Figure 4.10 Landscape and Ecology Mitigation Plan A [APP-207] . This should additionally improve user experience for pedestrian and equestrian users of the green lane



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			trees have been identified accurately plotted, with RPA, protective fencing as well as an indication of Accesses points into the site, the position of the internal road. The line of the internal road is set away from the existing hedges and associated trees in the fields running parallel to the boundary hedges. The road will have to cut through hedges at certain points but that should have a limited impact and where possible it would be useful to use existing gateways to reduce the need for new breaks in the hedges.	benefitting from its committed permissive access during the Scheme's lifetime. Along the green lane, existing gaps and field accesses in hedgerows have been used in two of the three proposed instances where access tracks would cut across the green lane. This is also shown in ES Figure 4.10 Landscape and Ecology Mitigation Plan A [APP-207].
WNC-006	Landscape and Visual	Site Description Visual Effects	Regarding Site A2 located north east of Walgrave it is bounded to the east by A43 with views where the hedge is maintained at a lower level/where gaps appear but there are a trees both individually and in continuous groups that provide strong mitigation, A combination of reinforced roadside planting with the identified management of hedges at a height of 4m would provide strong visual mitigation. The Kettering Road forming the northern most boundary is bounded by maintained lower hedges with occasional trees that allows views into the fields identified for the site. The indicated combination of reinforced roadside planting with the identified management of hedges at a height of	The Applicant notes this comment. The OLEMP Revision A [EX1/GH7.4_A] prescribes how the landscape and ecology mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives of the landscape mitigation. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A]. The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			4m would, like the eastern boundary, provide strong visual mitigation.	Draft DCO Revision A [EX1/GH3.1_A]. The OLEMP includes a commitment to maintain hedgerows to 4.5m. Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064].
WNC-007	Landscape and Visual	Site Description Visual Effects	The remaining nearest two roads Red House Lane two fields to the south and Walgrave Road approximately three to four fields to the west are both generally, due to distance and intervening hedge and associated tree planting, well screened from the site. There is a footpath CT3 that runs east from the village of Walgrave along the southern edge of the site beyond the sites southern hedgerow/tree boundary and there is proposal to introduce additional native tree planting along the southern boundary to enhance the existing generally strong boundary vegetation and then connect with the block of trees immediately south of the site. As with Site A hedges are retained and indicated to be enhanced, existing trees retained and protected as well as to strengthen two of the internal hedgerows with additional tree planting.	The Applicant notes this comment and confirms this description is accurate. The Applicant also clarifies that users of bridleway CT3 will benefit from the inclusion of a permissive route around the perimeter of Site A.2 accessed directly from bridleway CT3. This is shown on the Works Plan Revision B [EX1/GH2.4_B] and ES Figure 4.11 Landscape and Ecology Mitigation Plan A.2 [APP-208].



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WNC-008	Landscape and Visual	Site Description Visual Effects	The final site within WNC is Site B south of the village of Holcot, located between three roads, though none of the roads directly form any boundary to the site. The nearest is Moulton Road to the north west at its closest one field away, though that field rises gently with an established hedge including a high percentage of established trees forming the nearest site boundary with strong existing visual mitigation. The Sywell Road to the north east is at its closest at least two fields away with an established wood as well as strong field hedges with a decent percentage of established trees that provide strong intervening mitigation. The final road is the A43 to the south, the furthest of the three from the site, with a high percentage of the roadside vegetation composed of trees and where there is but hedgerow and views are possible the land is gently rising with distant intervening hedgerows providing visual mitigation.	The Applicant notes this comment and confirms this description is accurate.
WNC-009	Landscape and Visual	Visual Effects	In terms of the greatest public visual impact, it would be from footpath CW1 that runs from Holcot south along the western edge of the aforementioned wood one field to the east of the site then diagonally crossing the eastern most field included in the site. To the east of the footpath it appears that	The Applicant notes this comment. ES Chapter 8 Landscape and Visual Impact [APP-045] includes an assessment of potential visual effects associated with the Scheme with ES Appendix 8.3 LVIA Assessment Sheets Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			there would be no panels with the field retained for either ecology or agriculture, with tree planting between the footpath and the nearest panels to the west. The retained field hedge boundary vegetation and gapping up and reinforcement planting along the northern and southern edge of the site would substantially limit visual impact on the footpath from both directions. The omission of panels in the eastern section of the field that the path crosses significantly limits the visual impact on the footpath though the planting immediately west would take time to establish and create a physical boundary and visual mitigation.	[EX1/GH6.3.8.3_A] containing details on individual Visual Assessments. Visual Receptors are shown on ES Figure 8.7: Visual Receptors [APP-266]. The LVIA considers that for some aspects of the Scheme (the construction stage and up to Year 15 in particular), that there is the scope for Significant visual effects. However, where impacts and effects are identified then landscape mitigation measures have been applied to offset or remedy adverse effects, resulting in relatively few significant visual effects remaining post the establishment of the mitigation planting (Year 15). The LVIA includes an assessment of potential visual effects for users of Footpath CW1 (TP086: NN CW 1), recognising the juxtaposition of users with the proposed development and identifying Significant Adverse effects (Major / Moderate) at Construction and Year 1. However, following the establishment of the proposed planting mitigation along the western side of the PRoW (proposed native species rich hedgerow with irregular spaced native hedgerow trees), which would screen views of the proposed infrastructure, effects would reduce to Minor / Negligible. However, some



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				glimpses of proposed infrastructure would likely still be possible, and more so in winter months.
WNC-010	Landscape and Visual	Visual Effects	Generally the three sites appear reasonably well located with regard direct public visual impact. All sites have well established hedgerows including trees to be retained and incorporated into the proposed layouts and where roads boarder or bisect (sites A and A2) there is indicated reinforcement and where necessary the proposed management of hedgerows at a height of 4m. There are limited footpaths impacting the three sites and where one bisects the edge of site B the omission of panels in the area of field to the east reduces the visual impact allowing unaltered views to the east.	The Applicant notes this comment and confirms this description is accurate.
WNC-011	Arboriculture	Root Protection Areas	The indication of important trees and their indicated Root Protection Areas (RPA's) to be accommodated and the proposed access tracks within the three sites identifies that the existing hedgerow frameworks should be safeguarded during the installation process though there will be the need for a number of small sections of hedges removed to allow access around the site, which need to be	Minimum protective, development-free buffers have been built into the design to protect hedgerows and trees, as detailed in the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] . Access for construction and operational maintenance has been specifically designed to utilise existing field entrances and gaps in hedgerows and other linear habitats wherever possible, and through this



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			carefully monitored on site to limit the gaps to a minimum.	exercise, the need for new gaps in hedgerows or new ditch crossings has been minimised as far as possible. New permanent gaps through hedgerows into fields will measure approximately 3.5 - 6.5m in width, in keeping with typical agricultural accesses (as set out within ES Chapter 4 Scheme Description [APP-041]) and the ecological mitigation measures determined to be necessary for the opening of gaps are set out within the OEPMS Revision A [EX1/GH7.5_A] . This is secured in Schedule 2, Requirement 8 of the Draft DCO Revision A [EX1/GH3.1_A] .
WNC-012	Landscape and Visual	Landscape Effects	The extent of the solar panels are set away from the hedgerows and trees enabling retention and limiting any physical impact as a result. Finally access points appear limited on the sites further reducing physical impact. Notwithstanding the above, the proposal introduces a significant change to the landscape over a wide area particularly in respect of the rural setting of the villages of Old and Walgrave. The visual impacts will be extensive and where additional mitigation is required; this will take time to fully establish and reach maturity. Effective implementation and long-term	The Applicant notes this comment. The buffers outlined in Table 8.8 of ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] have been embedded into the design of the Scheme to protect the landscape fabric of the Sites. Infrastructure associated with the Scheme is located outside of the buffers listed below with the exception of internal access tracks where exclusion from the buffers is unavoidable. Measures for the implementation, management and monitoring of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			management of landscape mitigation will be key to ensuring an appropriate level of mitigation is achieved.	landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A]. This is secured in Schedule 2, Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A]. Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064].
WNC-013	Cultural Heritage	Heritage Impacts	The Council is generally in agreement with the cultural heritage assessment methodology that is described in the Environmental Statement, and are satisfied that those designated and non-designated heritage assets within the West Northamptonshire area that are likely to be affected by the proposals have been scoped in and taken forward for further assessment.	The Applicant welcomes the comment. Scoped in assets are considered to be agreed between both parties and will be stated within the Draft West Northamptonshire Council Statement of Common Ground [EX2/GH8.3.2]. Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120] details assets scoped in for assessment.
WNC-014	Cultural Heritage	Embedded Mitigation	The construction and operational mitigation measures that have been proposed to respond to the identified heritage and archaeological sensitivities, including: removing solar panels from some fields and providing offsets to protect the setting of assets; planting of shelter belts and scattered	The Applicant welcomes the comment. The proposed mitigation measures in Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] and the overarching archaeological mitigation strategy in ES Appendix 12.6



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			trees, minimising hedgerow removal and reinforcing existing or planting new hedgerows, and; design of construction traffic routes to limit the risk/extent of damage or disturbance to heritage assets, appear to be reasonable and proportionate.	Archaeological Mitigation Strategy [APP-146] have been established with consideration for heritage and archaeological sensitivities. This is secured in Schedule 2, Requirement 12 of the Draft DCO Revision A [EX1/GH3.1_A] .
WNC-015	Cultural Heritage	Designated and non-designated assets	It is inevitable that, despite the embedded mitigation measures, a project of this size, scale and nature in the proposed locations would result in harmful change to the historic character of the agricultural landscapes that surround and form the context of our rural settlements and isolated farmsteads. There will be indirect impacts to the significance of designated and non-designated heritage assets as a result of development within their settings. The residual harm is likely to be less than substantial. This harm should be given considerable weight in the planning assessment. The applicant would need to provide clear and convincing justification for this harm and demonstrate how the harm has been reduced to the lowest achievable levels.	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] and ES Appendix 12.7 Historic Landscape Assessment [APP-147] , has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Chapter 12: Cultural Heritage [APP-049] for embedded mitigation and Section 12.11 for additional mitigation). The Applicant considers the mitigation to have reduced the harm to the lowest level and welcomes further discussion with the WNC Conservation Officer to agree the proposed mitigation. No direct impacts have been identified to listed buildings. Identified impacts to listed buildings would be indirect and related to elements of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				their setting that contribute to their significance. The Scheme is classified as a Critical National Priority (CNP) project as defined in NPS EN-1 and therefore benefits from the strongest policy position in national planning policy. EN-1 sets out a presumption in favour of energy related development. NPS EN-1 explains at paragraph 3.3.63 that: <i>“The urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible”</i> Section 7 of the Planning Statement [APP-559] concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need, outweighs any potential significant adverse impacts which, as the Environmental Statement [APP-038 to APP-064]



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				sets out, are limited, and will be considered by the Secretary of State in making a decision on the application.
WNC-016	Cultural Heritage	Archaeology	In respect of archaeology, the Council's Archaeology Advisor, has advised that the assessments are at a level they would expect and the interim trial trenching reports are acceptable. The consultants were using come further non-intrusive techniques for areas which have not been subject to trial trenching, but the results are not yet available. The Council's Archaeology Advisor has indicated to the consultants that geophysics alone is not normally sufficient and should be backed up by other techniques. Discussions are ongoing in respect of new techniques and to assess whether any new trenching targets are identified.	The Applicant welcomes the comment and notes WNCs position on geophysical survey. The results of further non-intrusive techniques will be shared when available. The Applicant is currently in conversation with WNC about the mitigation strategy. The Applicant is discussing these matters through the progression of the Draft West Northamptonshire Statement of Common Ground [EX2/GH8.3.2].
WNC-017	Cultural Heritage	Proposed Mitigation	The Council's Archaeology Advisor will have questions about proposed mitigation strategies, primarily around preservation in situ as the proposals for strip/ map/ sample and monitoring are not controversial. More detail about any areas of preservation which are to be used as ecological enhancement will be required as this can have a detrimental impact on archaeological levels and	The Applicant is currently discussing the mitigation strategy with WNC. In particular identifying construction methods that would enable identified archaeological assets to be preserved in situ. Applicant notes WNC comments regarding ecological enhancements having an archaeological impact.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			those areas might therefore be preserved as well as anticipated	The Applicant is discussing these matters through the progression of the Draft West Northamptonshire Statement of Common Ground [EX2/GH8.3.2] .
WNC-018	Cultural Heritage	Concrete Feet	Further information is also required about the apparent reliance on cast concrete anchors for the panels in some of the preservation areas. For a development which is meant to reduce carbon, it is thought that the use of large amounts of concrete would be avoided and there are methods such as 3- or 4-pin piling, similar to what is used on landfill sites, which would be more environmentally friendly.	The Applicant is currently discussing the mitigation strategy with WNC. In particular identifying construction methods that would enable identified archaeological assets to be preserved in situ, such as the use of methods such as 3- or 4-pin piling. The Applicant is discussing these matters through the progression of the Draft West Northamptonshire Statement of Common Ground [EX2/GH8.3.2].
WNC-019	Decommissioning	Replacement of panels	Further details in respect of the decommissioning strategy would be helpful to understand if there will be a strategy for likely repair/ replacement during the life of the installation.	ES Chapter 4: Scheme Description [APP-041] states that across the 60-year lifetime of the Scheme, it is expected that alongside the regular maintenance of equipment, infrastructure such as panels and batteries will require replacement. The following assumptions have been made regarding the equipment replacements needed at the Scheme: • Solar PV Panels typically have a lifespan of up to 40 years or more, and it has been assumed that Solar PV Panels will be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				replaced once during the lifetime of the Scheme. The Solar PV Panels are anticipated to be replaced over a 24 month period. • The BESS and inverters could be replaced up to five times during the operational phase. • No intrusive ground works will be required to replace Solar PV Panels or BESS. The ODS Revision A [EX1/GH7.3_A] sets out the approach to decommissioning activities associated with the Scheme. This document sets out the principles of decommissioning and environmental considerations (see paras. 2.1.1 to 2.1.8) and provides a summary of potential mitigation and management measures during decommissioning through Table 3.1. It also sets out how roles, responsibilities and actions required in respect of implementation of the mitigation measures will be managed, along with principles for monitoring and reporting. This is secured in Schedule 2, Requirement 21 of the Draft DCO Revision A [EX1/GH3.1_A].
WNC-019	Transport and Access	Management Plans	Highway Matters Outline Construction Traffic Management Plan (OCTMP),	The Applicant notes and agrees with this comment. This is secured in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Outline Operational Traffic Management Plan (OOTMP) & Transport Assessment. The Council notes that both the OCTMP and OOTMP will be updated prior to commencement of construction to reflect any amends or comments made during the DCO process, and to add detail once a contractor is appointed. It will be necessary to secure detailed traffic management plans by DCO Requirement.	Schedule 2, Requirements 15 and 16 of the Draft DCO Revision A [EX1/GH3.1_A] .
WNC-020	Transport and Access	Site access points	During early consultation with the applicant, the most suitable construction traffic routes to sites Greenhill A, Greenhill A.2 and Greenhill B were considered in order to limit the impacts of this traffic on local communities and sensitive parts of the network. Whilst the submission has followed that advice, each route will be assessed through detailed review of the Transport Assessment and associated Traffic Management Plans. The Council will require measures in place to safeguard the condition of the public highway which can be at risk of damage due to extraordinary construction traffic movements. It will be expected that the detailed OCTMP will expand on the statement within the outline document to agree the exact scope of condition surveys and	The Applicant notes and agrees with this comment. The OCTMP Revision A [EX1/GH7.9_A] includes a provision to undertake a road condition survey associated with relevant sections of the highway network.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			mechanism for implementation of repairs. Due to the 2-year construction period, interim surveys may be required	
WNC-021	Transport and Access	Site access points	Site access points for Greenhill A, A.2 and B have been visited by Highways Officers. The suitability of these access points will be subject to detailed assessment based on traffic speed surveys, site survey and visibility calculations to ensure safe access can be achieved. Modifications to existing access points will be required.	The ES Appendix 13.2 Transport Assessment [APP-151 to APP-153] includes preliminary drawings to indicate how access points might be improved to provide access and secure visibility splays. The Draft DCO Revision A [EX1/GH3.1_A] provides the undertaker with the power to make the necessary improvements to existing accesses, as well as the creation of new accesses required for the Scheme.
WNC-022	Transport and Access	Highway Consents Public Rights of Way	Consents and Public Rights of Way (PROW) Whilst a number of Highway related Consents are covered by the DCO (for example, Traffic Regulation Orders Streetworks Licences and Highway Works Agreements), the applicant is still required to engage directly with the Council in respect of works directly impacting on the Public Highway. The construction phase may necessitate the temporary closure of PROW, however no details have been provided of potential diversion routes. Further engagement with the Council's Definitive Map Team will be required to agree a strategy.	The works to the local highway network during construction of the Scheme will be managed through the powers contained within the draft DCO. Article 16 of the Draft DCO Revision A [EX1/GH3.1_A] provides the Applicant with the power to implement traffic regulation measures to make temporary provision for the speed of traffic, restrictions on stopping, prescribed routes for traffic, and the suspension or amendment of existing Traffic Regulation Orders made under the Road Traffic Regulation Act 1984 (RTRA). These measures take effect as though they were Traffic Regulation Orders made



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				under the RTRA. Paragraph (4) requires the Applicant to consult with the relevant chief of police and the traffic authority before implementing any traffic regulation measure, and paragraph (5) requires the Applicant to provide at least 4 weeks' notice to the police and traffic authority, and place a newspaper notice of any traffic regulation measure at least 7 days in advance of it taking effect. The OPROWPPMP Revision A [EX1/GH7.10_A] sets out a framework for the management of routes throughout the Site. The key objective is to ensure that PROWs remain open, and safe at all times throughout the Scheme's construction, operational and decommissioning phases, with the same applying to permissive paths during the operational phase. This is secured through Schedule 2, Requirement 18 of the Draft DCO Revision A [EX1/GH3.1_A] which requires the detailed management plan to be submitted and approved.
WNC-023	Ecology and Biodiversity	Ecology Surveys Ecological Impacts	WNC Ecology has considered the details submitted for the proposed Green Hill Solar Farm, which includes several sites within the administrative boundaries of the Council, as well as	The Zone of Influence is considered for each Important Ecological Feature in the impact assessment within ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			connecting with sites within other administrative areas. With ecological considerations, impacts from development may be experienced outside of the proposed development area itself, within the wider landscape.	
WNC-024	Ecology and Biodiversity	Ecology Surveys	APP-046 (GH6.2.9 Environmental Statement Chapter 9 Ecology and Biodiversity) sets out the biodiversity and ecological elements of the Applicant's ES. A broad suite of ecological surveys and investigations have been undertaken by the Applicant. The results of these surveys have been used to inform the ES for the project and to be used in the development of any necessary mitigation measures. Surveys undertaken include: • Habitat and botanical surveys including both terrestrial and aquatic habitats. • Detailed surveys for protected and notable species, including reptiles and amphibians, breeding and wintering birds, bats, badgers, otters and water voles and arable weeds. APP-046 identifies a range of potential ecological effects during the construction of the proposal.	The Applicant notes this comment. Field surveys for reptiles and amphibians have not been undertaken, but desk study information and site context has informed the Applicant's assessment on these species groups. Further information relating to the ecological baseline is provided in the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. The Applicant agrees with all other points raised.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			These include permanent loss or change of habitats, temporary loss or damage to habitats, impacts on protected and priority species and spread of invasive non-native species (INNS). During operations and maintenance, the main potential effect is likely to be disturbance of protected and priority species. Decommissioning impacts are likely to be similar to construction impacts but at a more limited geographical extent and timescale.	
WNC-025	Ecology and Biodiversity	Mitigation Management Plans	The project is reliant on a package of avoidance, mitigation and enhancement measures to address the ecological impacts. Therefore the Applicant has prepared APP-545 GH7.1 Outline Construction Environmental Management Plan (oCEMP), APP-548 GH7.4 Outline Landscape and Ecological Management Plan (oLEMP), APP549 GH7.5 Outline Ecological Protection and Mitigation Strategy and APP-547 GH7.3 Outline Decommissioning Statement (oDEMP). Measures proposed in the above documents will need to be secured in the DCO. GH 6.2.7 ES Chapter 27 Commitments Register (APP-064) provides a helpful summary of the mitigation identified for the Project including embedded	The Applicant notes this comment. These documents are secured by Schedule 2, Requirements 13, 7, 8 and 21 respectively of the Draft DCO Revision A [EX1/GH3.1_A] .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			mitigation measures, which have been designed into the project.	
WNC-026	Ecology and Biodiversity	Habitats Regulation Assessment	Within 10km of the proposal is the Upper Nene Valley Gravel Pits SPA, internationally important site designated for breeding and wintering bird populations, given the potential for impacts on the SPA and particularly Functionally Linked Land (FLL) components of the Upper Nene Valley Gravel Pits SPA and Ramsar site, a GH7.21 Habitats Regulation Assessment (HRA) report has been submitted (APP-565) and concludes that there will be no adverse effects the integrity of the Upper Nene Valley Gravel Pits SPA and Ramsar site. The Planning Inspectorate will need to satisfy itself that sufficient information has been submitted by the Applicant to enable this conclusion to be reached.	The Applicant notes this comment.
WNC-027	Ecology and Biodiversity	Biodiversity Net Gain	Given the scale and nature of the proposed development the Council will expect the project to deliver at least 10% Biodiversity Net Gain (BNG). The Applicant has set out their approach to BNG in APP-046 GH6.2.9 and APP-096 Appendix 9.13 Biodiversity Net Gain Assessment. This document states at 1.11.2-5 that the project "will result in a significant net gain of biodiversity units". Based on an	The Applicant notes this comment and awaits further comments in the Local Impact Report. The BNG assessment has been prepared with realistic and achievable targets, based on Clarkson & Woods' extensive experience of monitoring active solar arrays; the habitats which establish; and the practicalities of management. This is set out in ES Appendix 9.13 BNG Assessment



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			indicative landscape masterplan, the Scheme (excluding the cable routes) is calculated to result in a net gain of 70.68% for area-based habitat units, 18.55% for hedgerow units and 16.16% for watercourse units. This calculation will need to be updated when the final design of the site is confirmed. The Council welcomes the Applicant's commitment to delivering BNG and considers that these commitments will need to be secured with a specific requirement in the DCO. The Applicant will also need to demonstrate that the commitments made to delivering BNG are achievable. Further detailed comments on ecology and biodiversity will be provided in the Local Impact Report.	Revision A [EX1/GH6.3.9.13_A] and is secured in Schedule 2, Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A] . Whilst there is no statutory obligation to deliver net gain for NSIPs, the Scheme will commit to 10% gain, as per Commitment EN010170 – EB– 19 in the ES Chapter 27 Commitments Register [APP-064] .



3 The Applicant's Responses to Statutory Consultees, International Agencies, Undertakers, and Elected Representatives with whom the Applicant has Undertaken a Statement of Common Ground

3.1 Anglian Water Services

Table 3.1: [RR-1214](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AW-001	General	Scope of representation	Anglian Water Services (AWS) is the appointed water and sewerage undertaker within areas of the proposed Green Hill Farm Project order limits. Previously, we have supplied written comments to the Scoping Consultation and to the formal Statutory Consultation on the proposed Development Consent Order (DCO) application and the Preliminary Environmental Information Report (PEIR). We have sought to engage with the Applicant, but this has been limited and there are outstanding matters which are set out further below.	The Applicant notes this comment.
AW-002	Draft Development Consent Order	Protective Provisions	A copy of AWS's template Bespoke Protective Provisions has been supplied to the Applicant's project team. A version has been included in the draft DCO under 'Schedule 15, Protective Provisions, Part 5' (document APP-017/GH3.1 Draft Development Consent Order), but this has been amended in several places without consultation or an opportunity to comment on these changes which is disappointing.	The Applicant notes AWS's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			AWS is obliged at this stage to object to the inclusion of this version of Protective Provisions as they are not satisfactory. As a statutory undertaker, AWS considers these to fall short of providing it with the necessary protections. AWS respectfully requests that the Applicant engage at the earliest opportunity to discuss and reach agreement on a set of acceptable Protective Provisions.	
AW-003	General	Protective Provisions	The Potential Matters for Examination listed (document APP-568/GH7.24) provides a limited summary of the main matters we have raised through previous engagement with the Applicant. For instance, the points raised on surface water drainage; the potential risk of damage to any AWS assets above ground assets and easements; and the potential risk of damage to other assets from plant and machinery (compaction and vibration during the construction phase), including from any haul and access roads and crossings are not covered.	The Applicant notes AWS's comment. The Applicant has provided an outline drainage strategy in Appendix 10.1: FRADS Revision A [EX1/GH6.3.10.1_A] which sets out how sustainable drainage will be incorporated into the Scheme to reduce surface water drainage to no more than greenfield runoff rates. The detailed drainage strategy is secured by Requirement 11 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Applicant has included protective provisions for AWS in Part 5 of Schedule 15 to the draft DCO and is engaging with AWS to agree the form of Protective Provisions. The Protective Provisions ensure that AWS's assets and undertaking are appropriately protected.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AW-004	General	Statement of Common Ground	The submission of an agreed SoCG would be beneficial to log matters under discussion, relating to the interfaces with our assets and any specific arrangements that are needed to be put in place. AWS would wish to continue dialogue with the project team to address these omissions. The expectation is that agreement on bespoke Protective Provisions for AWS for inclusion in the draft DCO, with other matters being addressed through the preparation of a bilateral Statement of Common Ground between both parties.	The Applicant notes this comment and has prepared an Anglian Water Statement of Common Ground [EX2/GH8.3.9] and has commenced engagement with Anglian Water Services.
AW-005	Compulsory acquisition	Book of Reference	Book of Reference (document APP-021/GH GH4.3) and Land and Rights Tracker (document APP-022/GH GH4.4) AWS's initial investigation has highlighted that the Book of Reference and associated documents are incomplete with respect to several easements and assets not identified which will be affected by this Project under Plans 4, 5, 8,11 and 12. AWS requests that these documents are updated through a full boundary check to reflect an accurate account of AWS's land interests within the Project's order limits. For land investigation questionnaires relating to AWS's above ground assets and formal easements, the Applicant should contact our estates team on: awsestates@savills.com	The Applicant has been in discussions with Anglian Water to obtain clarification over their assets and these have been corrected in the Book of Reference Revision B [EX1/GH4.3_B].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AW-006	Draft Development Consent Order	Protective Provisions	Interfaces between the Project and AWS assets (underground and surface assets) AWS owns and operates the water supply and sewerage infrastructure within the order limits. In locations where the Project intersects with these assets, measures will need to be in place to ensure their protection and operational continuity of water and sewerage services to customers will be required, including bespoke Protective Provisions referenced above. Through previous consultation stages, AWS has identified some notable assets within or in the vicinity of the order limits. There are a number of existing underground assets, including strategic supply pipelines which are in the Project's order limits. Supply pipes cross the access road for site B, for example, including mains water transfer pipelines from Pitsford Reservoir to the northwest that will require specific protection measures. Water recycling assets including foul sewers are within the village areas and so are within the Cable Route corridor. The design of the Project should minimise interaction with AWS assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.	The Applicant notes this comment and is engaging with AWS to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AW-007	Draft Development Consent Order	Protective Provisions	Chapter 24 Other Environmental Matters of the ES (document: APP-060/GH6.2.24) acknowledges the construction of the Project has the potential to affect existing below ground utility infrastructure. The Crossing Schedule (document: APP-562/GH7.18) lists numerous locations where AWS assets are located relating to water, surface and foul sewers and some de-commissioned pipes, with the proposed crossing method to be used. AWS has sought to engage with the Applicant to carry out a clash detection and technical assurance review of the Project in relation to AW assets in order to confirm, for example, any sensitive plant, open cut locations, access works, diversions any above ground plant and shared access locations. We strongly recommend that this assessment be undertaken at the earliest opportunity. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the Project. We would not agree that a review of utilities plans is used to inform plans for proposed works prior to construction. Given the substantial number of NSIPs and other AWS projects being delivered in this Asset Management Period 8 (2025-2030), there is a strong advantage to having upfront discussions with AWS in	The Applicant has requested further information from Anglian Water on the clash detection and technical assurance review.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			relation to our asset interfaces with the Project.	
AW-008	General	Construction methods	Further discussion is required between AWS and the Applicant to confirm these aspects, for example, trenchless crossings, ducting, open cut locations, access works, likely diversions, any above ground plant, and shared access locations. These matters should be addressed in supporting documents and will need to be amended accordingly as these matters are agreed.	Anglian Water assets have been identified in the Crossing Schedule [APP-562]. This document sets out the likely construction method of how the assets and obstacles will be crossed (i.e. by way of open cut trench, trenchless techniques such as Horizontal Directional Drilling (HDD) or a combination of both). Impacts on utility infrastructure will be mitigated through the measures set out in Table 3.18 in OCEMP Revision A [EX1/GH7.1_A]. This is secured through Schedule 2, Requirement 13 of the Draft DCO Revision A [EX1/GH3.1_A] which requires a detailed Construction Environmental Management Plan. The maximum parameters of the construction methods are set out in the CDPP Revision A [EX1/GH7.17_A] and these will need to be complied with at the detailed/construction stage.
AW-009	Hydrology and Flood Risk	Water Resource Assessment	Water Resources and Water Recycling/ Sewerage Services Water supply AWS has previously submitted representations stating the Project is proposed within an area of serious water stress designated by the Environment Agency.	The Applicant notes Anglian Water Services' representation. A Water Resources Assessment [APP-563] has been prepared to accompany the DCO application. This confirms that operational water demands for the Scheme will be minimal, as solar PV does not require routine process water.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Information has been provided to the Applicant about regarding the process for making requests for water supply for both domestic and non-domestic purposes. This included copies of our policy position statement on water requests for non-domestic purposes for over 20m ³ per day and a Water Resources Assessment to be completed.	Construction phase demand will be short-term and temporary, limited to welfare and dust suppression, with precise volumes to be agreed through the Principal Contractor and secured in the OCEMP Revision A [EX1/GH7.1_A]. The Scheme is located within an area designated as being under serious water stress by the Environment Agency. The Applicant acknowledges Anglian Water's policy position statement in relation to non-domestic water requests over 20m³ per day. Should a supply be required that meets this threshold, the Applicant will engage with Anglian Water Services through the established application process, including submission of a Water Resources Assessment in the required format. The assessment undertaken in the Water Resources Assessment [APP-563] demonstrates that the Scheme is not anticipated to give rise to significant effects on water supply or resources, and no abnormal demands are expected during operation. The Applicant will continue to liaise with Anglian Water Services as required to ensure compliance with its procedures.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AW-010	Hydrology and Flood Risk	Water Supply	The Planning Inspectorate's Scoping Opinion stated that the ES should provide details of water supply and demand requirements during both construction and operation (including in the context of BESS fire risk). It is considered that the need for potable water (domestic and non-domestic purposes) for the different stages of the Project is not adequately addressed in the ES. Some detail on the need for water usage on a permanent basis for the Project is set out under the Water Resources Assessment (document APP-562/GH7.19) and Chapter 10 - Hydrology and Flood Risk of the Environment Statement (document APP-047/GH6.2.10). These state that due to the nature of the Project there is no need requirement for a permanent water supply during operation and that instead for periodic panel washing a water supply will be delivered by tanker. Confirmation is not given on the temporary requirements for water supply at the construction and de-commissioning stages. This should be confirmed as it is likely that the former will require the most amount of water resource. The source of water supply for local firefighting provision within the Green Hill BESS has also not been specified	The Applicant notes Anglian Water Services' comments. Water demand across all stages is addressed in the Water Resources Assessment [APP-563] and ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A]. During construction and decommissioning, requirements will be temporary and limited to welfare and dust suppression, supplied via existing infrastructure (subject to agreement with the undertaker) or tanker delivery. These provisions are secured in the OCEMP Revision A [EX1/GH7.1_A]. During operation, no permanent supply is required. Occasional panel washing will be undertaken by tanker, as confirmed in the Water Resources Assessment [APP-563]. For the Battery Energy Storage System (BESS), firefighting provision is secured through the OBSSMP Revision A [EX1/GH7.7_A], which confirms that firewater will be managed via impermeable surfacing, containment systems and shut-off valves, with water supplied by tanker as required. Accordingly, water demand is minimal, temporary in nature during construction and decommissioning, and appropriately



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				secured Schedule 2, Requirements 13, 6, and 11 of the Draft DCO Revision A [EX1/GH3.1_A] and detailed management plans that are secured by those requirements.
AW-011	Hydrology and Flood Risk	Water Consumption	Water consumption associated with future site users is quoted to be minimised through the use of appropriate water efficiency measures. This is welcomed but no further detail is provided. It is considered that further consideration should be given to these matters in order that they are adequately addressed in terms of the Project and also be confirmed in the SofCG.	The Applicant notes Anglian Water Services' comments. As confirmed in the Water Resources Assessment [APP-563] and ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A], operational water consumption will be minimal. The Scheme does not require a permanent water supply, with only occasional panel washing undertaken by tanker delivery. Any limited consumption associated with construction or operational staff will be managed through the Principal Contractor and minimised by standard water efficiency measures such as low-use fixtures in welfare facilities. These commitments are secured through the OCEMP Revision A [EX1/GH7.1_A]. The Applicant is content for these measures to be confirmed in the Statement of Common Ground with Anglian Water Services [EX2/GH8.3.9].
AW-012	Hydrology and Flood Risk	Water Recycling Sewage	Water recycling/ Sewerage services Appendix 10.1: Flood Risk Assessment and Drainage Strategy of the ES (document APP/GH6.3.10) confirms that there would	The Applicant notes Anglian Water Services' comments. As confirmed in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] , there



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			be no foul water discharge from the proposed Development and there is no requirement for a mains connected foul drainage system. The strategy states there is no known existing foul network on the Site or adjacent. Due to the nature of the Project wastewater associated with welfare facilities at the substations will be contained in a septic tank to be emptied as and when required by tanker as there will be no foul drainage network associated with the Site. There would then be no need for the draft DCO to include any provisions providing for a general right to connect to any of AWS's wastewater assets. See further comment below regarding Schedule 2 Requirements Part 11 of the draft DCO. AWS wishes to state that it should not be implied or agreed that any wastewater collected by the licensed waste carrier will be received at one of its sites for processing.	is no foul drainage network associated with the Scheme and no requirement for a mains connection. Welfare facilities at substations will discharge to sealed septic tanks, emptied by tanker via a licensed waste carrier. This approach is embedded in the submitted strategy and consistent across all Sites, as set out in the FRADS Annexes A–J [APP-098 to APP-108]. While the detailed sizing of tanks will be confirmed at design stage, the principle of sealed tanks with tanker removal is fixed. The draft DCO includes standard and well precedented provisions to enable the discharge of clean water, but this must always be done with consent, in accordance with approved plans, and allowing for supervision of the making of the connection. The draft DCO does not include a general right to connect to Anglian Water Services' wastewater assets. Disposal of foul water from welfare facilities will be through licensed carriers to appropriate facilities, and it is agreed that use of Anglian Water Services' sites will not be implied unless separately agreed.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AW-013	Hydrology and Flood Risk	Flooding and Surface Water	Flooding and surface water drainage Appendix 10.1: Flood Risk Assessment and Drainage Strategy of the ES (document APP/GH6.3.10) assesses flood risk from all applicable sources and sets out the measures proposed to manage flood risk. The commitment to surface water betterment including an allowance for climate change over the Project's lifetime is supported.	The Applicant welcomes Anglian Water Services' support and notes agreement with the approach set out in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes [APP-098 to APP-108] .
AW-014	Hydrology and Flood Risk	Embedded mitigation	Embedded mitigation measures for the construction, operational and decommissioning phases explain that the Project would be served with drainage systems that embed SuDS for attenuation of runoff to green field runoff rates, which is welcomed by AWS, and follows the drainage hierarchy.	The Applicant welcomes Anglian Water Services' support and notes agreement with the embedded SuDS measures set out in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes [APP-098 to APP-108] .
AW-015	Draft Development Consent Order	Requirements	It is noted that there is a secured commitment for provision of a detailed surface water drainage scheme to be prepared, which is listed under Schedule 2 Requirements Part 11 of the draft DCO. The Applicant confirms in the above documents that it does not require the use of the public sewer network to manage additional surface water flows and (if any) foul water drainage system. There would then be no need for the draft DCO Order to include any provisions	The Applicant confirms that it does not anticipate the need to make any connection into AWS's foul sewer network, however this cannot be ruled out until the detailed design stage has been completed. In the event a connection is necessary, this would be subject to the Protective Provisions for Anglian Water in Part 5 of Schedule 15 to the Draft DCO Revision A [EX1/GH3.1_A] . The Applicant is engaging with AWS to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			providing for a general right to connect to any of AWS's assets. AWS reserves its position on the need to be included as a consultee to the drainage management plan, including the relevant DCO for any discharge of requirements in relation to drainage plans and surface water discharge.	Following further discussions with Anglian Water, the Applicant has amended Requirement 11 to include Anglian Water as a consultee.
AW-016	Hydrology and Flood Risk	Surface Water	The OCEMP (document APP/GH7.1) also refers to the management of surface water runoff, in that there will be no intentional discharge of site runoff to drains or sewers without appropriate treatment and agreement of the appropriate authority. Our comments referring the need to be consulted on the preparation of a Drainage Management Plan are therefore relevant. Framework management plan documents: Document APP/GH7.1 OCEMP (see Table 3.18: Other Environmental Matters) Document APP/GH7.9 Outline Construction Traffic Management Plan Document APP/GH7.2 Outline Operational Environmental Management Plan Document APP/GH7.24 Outline Operational Traffic Management Plan Document APP/GH7.3 Outline Decommissioning Statement AWS notes the submission of these framework documents. AWS would welcome specific reference on how the	The Applicant notes Anglian Water Services' comments. As confirmed in the OCEMP Revision A [EX1/GH7.1_A], there will be no intentional discharge of site runoff to drains or sewers without appropriate treatment and agreement with the relevant authority. Anglian Water assets have been identified in the Crossing Schedule [APP-562], which sets out the likely construction methods to be adopted (including open cut trenching, trenchless techniques such as Horizontal Directional Drilling (HDD), or a combination of both). Impacts on utility infrastructure will be mitigated through the measures in Table 3.18 of the OCEMP Revision A [EX1/GH7.1_A], which addresses risks such as compaction and vibration during construction of haul and access roads. These measures are secured through



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			interfaces with utility assets such as for sewers and water supply within the Order Limits will be managed through the construction of haul roads, bellmouths. Whilst Protective Provisions should address those interfaces with our assets, AWS would welcome further discussion with the Applicant regarding such matters and their inclusion in the final versions of these documents. These documents should include steps to remove the risk of damage to AWS assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings.	Schedule 2, Requirement 13 of the Draft DCO Revision A [EX1/GH3.1_A]. The Applicant will continue to engage with Anglian Water Services to ensure these commitments are appropriately reflected in the final management plans.
AW-017	Draft Development Consent Order	Protective Provisions	AWS would seek to ensure that 24 hours / 7-day access to our assets is not compromised and, therefore, would welcome further discussion with the Applicant regarding such matters and their inclusion in the finalised documents.	The Applicant notes AWS's comment. The protective provisions for AWS in Part 5 of Schedule 15 to the Draft DCO Revision A [EX1/GH3.1_A] provide for AWS's access to its apparatus to be maintained, including in any streets subject to restricted access under the DCO. The Applicant is engaging with AWS to agree the form of Protective Provisions.



3.2 Environment Agency

Table 3.2: [RR-1224](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EA-001	General	Structure of Relevant Representation	We are advised that on 19 June 2025 an application (reference EN010170) for a Development Consent Order (DCO) was accepted by the Planning Inspectorate for examination. These Relevant Representations contain an overview of the project's issues which fall within our remit. They are given without prejudice to any further detailed representations we may make throughout the examination process. We may also have further representations to make when supplementary information becomes available in relation to the project. We have reviewed the DCO, Environmental Statement (ES) and supporting documents submitted to the Planning Inspectorate as part of the above-mentioned application.	The Applicant notes this comment.
EA-002	Hydrology and Flood Risk	Water Supply	Issue The Planning Inspectorate comments ID 3.4.7 referring to the Environment Agency's response regarding water supply has not been addressed adequately. It is agreed by both parties that the ES should provide details of water supply and demand requirements during construction and operation (including in the context of BESS fire risk). Whilst the response states that this has been addressed throughout the ES chapter, this is	The Applicant notes the Environment Agency's comments. Water supply and demand requirements are assessed in the Water Resources Assessment [APP-563] and ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A] . These confirm that operational demands are negligible, with no permanent water supply required. Occasional panel washing will be undertaken by tanker, and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			not the case. The comments relating to this item in the table make reference to pollution risk from HDD breakout which is not relevant to this item. Water supply has not been identified for purposes made reference to by various chapters of the report: • Dust suppression techniques and Wheel washing • Concrete production • Bentonite drilling fluids and supply to water pumps relating to trenchless cable installation. Impact The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification). The water companies in this region are already unable to supply new non-domestic demands in targeted areas of East Anglia until new strategic supplies can be developed. If the water demands of the construction process are not evaluated, access to water could pose practical problems to the scheme.	firefighting provision for the BESS is set out in the OBSSMP Revision A [EX1/GH7.7_A], which confirms that firewater will be delivered by tanker and managed within dedicated containment systems. During construction, water will be required for welfare, dust suppression, wheel washing and temporary activities such as concrete batching and trenchless cable installation. These demands will be temporary and short-term, with supply sourced either from existing infrastructure (subject to agreement with the relevant undertaker) or by tanker. These provisions are secured through the OCEMP Revision A [EX1/GH7.1_A] and will be managed by the Principal Contractor in consultation with the relevant authorities. The Applicant recognises that the Scheme is located within an area designated as being under serious water stress. Where daily demands exceed 20 m³, the Applicant will apply for the necessary abstraction or supply licence in consultation with the Environment Agency and Anglian Water Services. The Applicant also acknowledges that tankering water



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Tankering water adds HGVs to local roads which should be included in the traffic management plan. Groundwater is likely to be closed to new abstraction. Access to local surface water or shallow groundwater will be subject to conditions which restrict abstraction to periods of high flows only. Solution A basic water supply strategy which evaluates alternative sources of supply has been recommended at scoping and at PEIR stages of pre application. It is at the applicants own risk if the access to water and permitting requirements are underestimated as this can often cause significant delays at pre-commencement. Additional narrative/ explanation (if necessary) It is acknowledged that operational volumes of water are deemed to be low and tankering water will not impact local water resources. Fire fighting water and cooling have not been specified, it is therefore assumed that water supply will not be required for the BESS. Any environmental impact of licences required for abstraction will be undertaken as part of the permitting process and we do not wish for the applicant to duplicate this work during the planning process. However, details of licence restrictions can be found in the abstraction	will generate some additional vehicle movements. As confirmed by the Water Resources Assessment, the peak construction water demand for the whole Scheme of 137m³/day can be met by five articulated water tankers (capable of delivering 150m³/day). The HGV movements assessed during the construction phase allow for these movements, and these will also be subject to the mitigation set out in the OCTMP Revision A [EX1/GH7.9_A]. On this basis, the Applicant considers that water supply requirements have been appropriately identified and secured.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			licensing strategy for the catchment and unless it can be demonstrated that the construction phase will require less than 20m3 per day, then any practical implications for the scheme should be considered.	
EA-003	Hydrology and Flood Risk	BESS Risk	Issue With regard to the external firefighting water capture drainage system 5.3.2. says “The water contained by the valves will be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site (if polluted) or releasing into drainage systems, if safe to do so” Impact Firewater and other chemicals from BESS pose an unacceptable risk to the water environment receptors and will deteriorate water quality unless it is contained sufficiently. Solution Firewater should be removed. Additional narrative/ explanation (if necessary) In the event of a fire taking place in a BESS battery container, the fire suppression system is activated, automatically closing the drainage system, and the suppression system ultimately extinguishes the fire. However, any fire water	Section 5.3.2 of the OBSSMP Revision A [EX1/GH7.7_A] differentiates on drainage solutions and pollution risk of water used by fire fighters for external boundary cooling (where pollution risks are minimal) compared to any internal BESS fire suppression system (where pollution risks are high). The OBSSMP stipulates that: “If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be <u>integrated</u>, water runoff is likely to contain higher levels of pollutants compared to water used for external boundary cooling of BESS and ESS equipment. All process water used in the system shall be prevented from contaminating potable water sources in accordance with local regulations through the use of check valves or other means as part of the system design. Pollution analysis will be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			would be contaminated by the fire damaged batteries (PFAS, etc.). If a gravel attenuation substrate is used, the applicant needs to explain how would any sorbed contamination in this substrate be managed? This could act as an ongoing secondary source of contamination even following the removal of contaminated fire water post-event if rainwater runoff flows over the contaminated gravel. The applicant should consider, if the substrate is found to have an ongoing contaminant issue, would all containers need to be removed to enable remediation of this material? Catchment zoning and isolation should be considered in this case. Alternatively, an above-ground attenuation system would make managing sediment or surface contamination easier. Furthermore, if there is a permeable gravel subbase, it should be made clear that the containment area should be able to retain sufficient volumes of firewater, even in a worse-case scenario of heavy rainfall.	conducted before removing and treating offsite.” The OBSSMP section 5.3.2 stipulates that the Applicant will ensure that drainage capture systems for both boundary cooling water runoff and direct suppression (if integrated) system water runoff must be fully contained and tested before appropriate post incident actions are taken.
EA-004	Hydrology and Flood Risk	Foul Water	Issue We note that 10.8.20 says “foul water from welfare facilities will be managed using suitably sized self-contained units provided by a specialist contractor. No discharges to watercourses will occur under any circumstances.” And that 10.8.23 says “welfare facilities at the substations will be contained in a septic tank to be emptied as and when	The Applicant notes the Environment Agency’s comments. As confirmed in ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A] and the ES Appendix 10.1 FRADS Revision A [EX1/GH6.3.10.1_A] , there is no foul drainage network associated with the Scheme and no discharges of foul or polluted material to watercourses will occur under any circumstances.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			required by tanker.” However, further foul water disposal strategy could be provided. Impact There is a requirement to ensure that foul water treatment and disposal is adequate to minimise risk to water quality. Solution Foul water disposal strategy should be provided in more detail. Additional narrative/ explanation (if necessary) We note, 10.8.20 essentially repeats 10.8.19 without adding any further detail and 10.8.22 seems unrelated to the content which could be confusing to readers. From 10.8.20, it is unclear if discussions with local water companies have happened or if they are unavailable. (We note that this is latter clarified in section 5.5.1 of the Appendix 10.1: Flood Risk Assessment and Drainage Strategy, but it could be better explained in Chapter 10 itself). If treatment and discharge at the site is required, you should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought. This will still need to be assessed depending on the size of septic tanks. Given the timeframe to determine environmental permits we encourage applicants to engage with us on permit requirements at the earliest possible	Welfare facilities at substations will be served by sealed septic tanks or self-contained units, to be emptied as required by tanker using a licensed waste carrier. This approach is embedded in the submitted strategy and consistent across all sites, as confirmed in the FRADS Annexes A–J [APP-098 to APP-108]. Whilst detailed sizing and emptying frequency of septic tanks will be confirmed at the design stage, the principle of sealed containment with tanker removal is fixed. The draft DCO does not seek any right to connect to water company foul networks. Where discharge permits are required for temporary facilities, these will be obtained from the Environment Agency at the relevant stage. Wastewater removed by tanker will be managed in accordance with the waste management procedures set out in the OCEMP Revision A [EX1/GH7.1_A], with disposal through licensed carriers to appropriate receiving facilities. The Applicant will continue to engage with the Environment Agency as necessary to confirm



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			stage. Septic tanks and sewage treatment plants: what you need to do: Apply for a permit - GOV.UK If road transport to an offsite disposal facility is required to remove foul water from the forementioned "self-contained units", then there should be regard for this within the waste management procedures.	permitting requirements in advance of construction.
EA-005	Hydrology and Flood Risk	Groundwater	Issue Sensitivity of groundwater receptors is not defined in this chapter. 8 Discussion around sensitivity of groundwater receptors is based on an unsuitable risk classification. Impact Potential for impacts on groundwater to be considered lower risk than they should be. Solution Review definitions and discussions to determine if conclusions about effects on groundwater need to be revised. Additional narrative/ explanation (if necessary) In 10.8.16, it states: "The sensitivity of ... groundwater receptors is Medium." This is repeated in 10.8.42 and 10.8.55. The sensitivity of groundwater receptors (such as aquifers) is not defined in Table 10.3, so this statement is unsupported. In Chapter 22, Table 22.3, Principal aquifers are defined as High sensitivity, and principal bedrock aquifer is	The ES Chapter 22: Ground Conditions [EX1/GH6.2.22_A] sets out the baseline geology, hydrogeology and identified receptors, including superficial deposits such as alluvium and head deposits, Source Protection Zones and the potential for shallow groundwater emergence. These are addressed through the Preliminary Risk Assessments and managed by commitments in the OCEMP Revision A [EX1/GH7.1_A]. Any potential sources from the BESS or substations are already mitigated in ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A] through the embedded drainage design, which includes lined systems with shut-off valves and storage sized for 1 in 100 plus climate change and fire water events. On that basis this is not a flood risk issue. It is explicitly covered in ES



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			present directly underlying the site in some areas. Overall status of the WFD groundwater bodies covering most of the site is Good, which is defined as High sensitivity in Table 10.3.	Chapter 22: Ground Conditions and Contamination [EX1/GH6.2.22_A] with drainage design controls in ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A] ensuring the source is managed.
EA-006	Hydrology and Flood Risk	Water receptors	Issue Insufficient detail about water receptors. Impact Readers may not understand what water receptors are present or how to categorise them. Solution Review the information presented. Updated the table and any subsequent sections and discussions as necessary. Additional narrative/ explanation (if necessary) We would expect the applicant to define the groundwater aquifer types. The entry “water bodies of medium quality” is far too vague to be used in an assessment such as this. Principal and secondary aquifers are discussed later in this report so it would be useful to define them here. Water Framework Directive (WFD) classifications could also be in this table. While this information is in Chapter 10, it is also relevant here. The same applies to Table 22.4.	The Applicant notes the Environment Agency's comments. Definitions of groundwater receptors, including Principal, Secondary and Unproductive Aquifers, are provided in ES Chapter 22: Ground Conditions and Contamination [EX1/GH6.2.22_A], supported by aquifer classification mapping. These receptors are assessed alongside surface water bodies with reference to Water Framework Directive classifications in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A]. The sensitivity of these receptors has also been considered in ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A] and the ES Appendices 10.1 to 10.11 FRADS Report Revision A [EX1/GH6.3.10.1_A, APP-098 to APP-108], which apply the aquifer and WFD definitions in assessing potential effects. The Applicant will



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				ensure consistency between the hydrology and ground conditions chapters in the final documentation and agrees that reference to formal aquifer classifications provides clearer context than generic terms such as “water bodies of medium quality.”
EA-007	Hydrology and Flood Risk	Risk to controlled waters Scheme design	Issue Applicant proposes vegetation in solar panel areas will capture and take up or filter contaminants including hydrocarbons and heavy metals, thus reducing potential impact to groundwater receptors. This is not appropriate mitigation in isolation. Impact Potential risk to controlled waters. Solution Remove this recommendation or rephrase the text to focus only on sediment and silt. Additional narrative/ explanation (if necessary) In 10.8.43 it states: “Embedded mitigation, as set out in Section 10.7, includes maintaining vegetated groundcover across the Site ... where fire risk and contaminant load are low, these measures are considered sufficient to reduce the likelihood and extent of pollution. The distance from receptors combined with	The Applicant notes the comments. The discussion in the ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A] recognises that the risk of hydrocarbon and heavy metal contamination from solar panel areas is very low. The embedded mitigation measure of maintaining vegetated groundcover was intended to describe the management of sediment and silt in surface water runoff rather than the removal of hydrocarbons or heavy metals. Additional protection against hydrocarbons and other pollutants is secured through the measures set out in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and the OCEMP Revision A [EX1/GH7.1_A], which require the use of lined drainage, shut-off valves, and controlled discharge or



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			vegetation provides a slowing and filtering effect, which offers a degree of treatment and reduces the potential impact." We are not satisfied that vegetation provides a "slowing and filtering effect" on hydrocarbon and heavy metal contamination (referred to in Section 10.8.39). We agree that the risk of fire, and likely quantity of contaminants generated by such a fire, in the solar panel areas are low. We do not agree with the subsequent discussion on this topic.	tanker removal in the event of any accidental spill. These controls ensure that risks to controlled waters are avoided. The Applicant will update the text at the next iteration to clarify that vegetation provides a slowing and filtering effect for sediment and silt only. The assessments in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes remain valid, with no significant risk to controlled waters identified.
EA-008	Hydrology and Flood Risk	Drainage and BESS	Issue Description of drainage and firewater capture system at proposed BESS sites is inconsistent between chapter and supporting documents. Requirement for impermeable lining is not clearly stated in all relevant commentary. Impact Applicant's intended design may not be carried forward to final planning. Recommendations and comments may be based on a misunderstanding, or on partial information. Requirement for impermeable membrane may be missed. Solution Ensure description of drainage and firewater capture system at proposed BESS sites is	The Applicant notes the Environment Agency's comments. The design intent is that all BESS compounds will incorporate a fully contained drainage system to prevent uncontrolled release of firewater or contaminated runoff. As confirmed in the ES Appendix 10.1 FRADS Report [EX1/GH6.3.10.1_A] and the FRADS Annex J: Green Hill BESS [APP-108], one option is for the compound subbase to act as the attenuation medium, comprising permeable gravel underlain by an impermeable liner. This ensures that firewater is held within the subbase and fully contained by the liner.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			consistent. Consider providing a single reference section, which might be supported by a detailed drawing, for all interested parties to refer to. Additional narrative/ explanation (if necessary) In Chapter 10, Section 10.9.3 it states: "runoff from the energy storage area will be contained by local bunding and attenuated within gravel subgrade of lined permeable SuDS features". The use of "permeable" associated with "lined" does not clearly explain that the lining must be impermeable and the system must be fully contained. GH7.7 (OBSSMP) Section 5.5.5 also mentions a "line, permeable gravel subbase", without specifying the lining must be impermeable. There is very limited other discussion of the design of the drainage system for BESS sites in this document. The word "impermeable" does not appear in this document. We have not identified within the drainage strategy (GH6.3.10.1) any specification that the permeable gravel will be underlain by impermeable liners. Bunding and self actuating valves are not mentioned in the drainage strategy covering report, as is suggested in GH5.8 pp.66-67. We were pleased to see a little more detail in the specific drainage strategies for Green Hill C (GH6.3.10.6) and Green Hill BESS (GH6.3.10.11). Section 2.8.3 in each report states: "Firewater (including water run-off from	The Applicant recognises that alternative engineered solutions may be taken forward at detailed design, provided they deliver the same outcome of isolation, storage and safe removal. In line with other nationally significant infrastructure projects, this may include sealed underground tanks or chambers connected to a dedicated drainage network with shut-off valves, designed to contain the worst-case firewater volume plus allowance for rainfall during an incident. All systems will operate on the same principle: firewater will be isolated from surface and groundwaters, retained on site, and either tested and released if uncontaminated or removed by tanker if polluted. This approach is consistent with the OBSSMP Revision A [EX1/GH7.7_A] and secured through Requirement 19 of the Draft DCO Revision A [EX1/GH3.1_A]. The Applicant will ensure that terminology across the ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A], the ES Appendices 10.1 to 10.11 FRADS Report Revision A [EX1/GH6.3.10.1_A, APP-098 to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			fire-fighting equipment) and other surface water pollution risks will be managed through the use of impermeable liners, containment systems and isolation valves that close automatically in the event of a fire." The proposed permeable gravel fill is not mentioned in these sections, but it is discussed elsewhere in the same reports. We suggest that, for completeness, "impermeable" be added to the lining description in GH6.3.10.11 sections 3.5.2 and 3.8.1. In GH7.2 (OOEMP) Table 3.4, it suggests that any captured firewater will be removed from site by tanker. Other documents submitted suggest there will be chemical testing first and uncontaminated water may be released (for example, GH7.7 Section 2.4.1: "firewater run-off is contained and tested before release" and GH7.7 5.3.2). We suggest the OOEMP be updated to be consistent and clear.	APP-108] , the OBSSMP Revision A [EX1/GH7.7_A] and the OOEMP Revision A [EX1/GH7.2_A] consistently reflects the need for impermeable containment, while maintaining flexibility as to the specific engineering solution.
EA-009	Hydrology and Flood Risk	Drainage and BESS	Issue Proposal for drainage systems around BESS sites to be infilled with gravel. Impact Potential for secondary release of contaminants from firewater which bind to gravel and are not tested or pumped out after a fire event. Potential accumulation of silt at base of gravels. Solution	The Applicant notes the Environment Agency's comments. As confirmed in ES Appendix 10.11: FRADS Annex J: Green Hill BESS Revision A [EX1/GH6.3.10.11_A] and the OBSSMP Revision A [EX1/GH7.7_A] , the BESS compounds will incorporate fully contained drainage systems with impermeable containment and automatic shut-off valves. Firewater will be isolated on site and either tested and released if



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Provide a procedure which explains how this issue will be managed. Additional narrative/ explanation (if necessary) The following scenario should be taken forward into any detailed design stage for BESS drainage design: - A fire takes place in a BESS battery container and the fire suppression system is activated, automatically closing the drainage system. The suppression system ultimately extinguishes the fire, but the fire water is contaminated by the fire damaged batteries. If a gravel attenuation substrate is used, how would any sorbed contamination in this substrate be managed, as this could act as an ongoing secondary source of contamination of rainwater runoff following the removal of contaminated fire-water post-event? If the substrate is found to have an ongoing issue would all containers need to be removed to enable remediation of this material? Catchment zoning and isolation should be considered in this case. Alternatively, an above-ground attenuation system would make managing sediment or surface contamination easier. - The applicant proposes to incorporate a penstock valve automatically triggered in the event of a BESS fire. We support this	uncontaminated, or removed by tanker if polluted. The baseline design is for a gravel subbase underlain by an impermeable liner, ensuring that all retained firewater is fully contained. At detailed design, alternative engineered containment solutions such as sealed underground tanks or chambers may be adopted where appropriate, provided they deliver the same outcome of complete containment and controlled removal. Procedures for inspection, maintenance and, if necessary, replacement of any contaminated subbase material will be defined at detailed design, with catchment zoning considered to minimise any remediation footprint. To address the Environment Agency's concerns regarding valve reliability, the Scheme will adopt shut-off valves with proven performance supported by an inspection and testing regime, secured through the OOEMP Revision A [EX1/GH7.2_A] and Requirement 14 of the Draft DCO Revision A [EX1/GH3.1_A]. This approach provides flexibility in the engineering solution while ensuring that firewater containment



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			proposal. The OOEMP should include ongoing maintenance and testing of penstock valve(s) as traditional penstocks, when not operated for a long period of time, have historically been known to seize up and thus be inoperable at times of emergency.	and long-term protection of the water environment are secured.
EA-010	Hydrology and Flood Risk	Decommissioning	Issue Only considers “or release hazardous contamination for the operational timescale of the development.” This does not appear to include decommissioning and any time thereafter. Impact Impacts during decommissioning and any time thereafter do not appear to have been considered. Solution Ensure that these impacts are considered. Additional narrative/ explanation (if necessary) Contamination may persist beyond the operational timescale of the development.	The Applicant notes the Environment Agency's comments. Potential effects during decommissioning have been considered in the ES Chapter 10: Hydrology, Flood Risk and Drainage [EX1/GH6.2.10_A], the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A], and the ODS Revision A [EX1/GH7.3_A]. These confirm that decommissioning will follow the same embedded principles as construction, with drainage managed through appropriate SuDS measures and with no uncontrolled discharges to ground or surface waters. Any residual contamination risks persisting beyond the operational life of the Scheme will be managed through measures secured in the OCEMP Revision A [EX1/GH7.1_A], the OOEMP Revision A [EX1/GH7.2_A], and the OSMP [APP-550], which require appropriate testing, handling,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				removal and disposal of any contaminated materials, including any SuDS or drainage components within the BESS compounds. The Applicant will also comply with any permitting requirements in consultation with the Environment Agency. This approach is consistent with the commitments set out under 'EA-011', which address the management of previously unidentified contaminants. Accordingly, the Applicant confirms that potential impacts to the water environment during decommissioning and thereafter have been assessed and are controlled through the submitted management plans and secured by the Draft DCO Revision A [EX1/GH3.1_A].
EA-011	Hydrology and Flood Risk Ground Conditions	Unidentified contaminants	Issue Proposed discovery strategy has a focus on the identified sources and is not explicitly clear that it applies to the whole development. Proposed strategies in appendices are inadequate (see Additional narrative). Impact Potential for site workers to not adequately consider discovery strategy and possibility of previously unidentified contamination across	Applicant acknowledges the request. The discovery strategy is to apply for the entire site. This has been clarified and set out in Table 3.16 of the OCEMP Revision A [EX1/GH7.1_A] which is secured by Schedule 2, Requirement 13 of the Draft DCO Revision A [EX1/GH3.1_A]. Notifications are to be made to the EA or relevant regulatory authorities if conditions



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			whole site. This could lead to a risk to site workers, future site users, and controlled waters. Solution Ensure it is explicitly clear in all relevant documents that the discovery strategy applies to the whole site. Consider our comments and update discovery strategy in all relevant documents accordingly. Additional narrative/ explanation (if necessary) In Chapter 22, Section 22.7.5, we are happy that the discovery strategy has a focus on the identified sources, but it needs to be clear it applies to the whole development. It should be added that the EA may also need to be notified about contamination if it affects receptors within our remit. The LPA may be able to assist with this latter part. The same comments apply for GH7.1 (OCEMP) Table 3.16 and GH7.3 (ODEMP) Table 3.1 [Ground Conditions row]. These should be updated accordingly. In GH7.1 (OCEMP) Table 3.4, the paragraph beginning "If any suspected contaminated material is discovered during the works" is insufficient. The procedure outlined is not acceptable and differs from the process detailed elsewhere. A detailed CEMP based on the content of this part of the OCEMP is likely to be lacking. Appendix 22.2 (PRA – Cable	impact receptors within their jurisdiction. Additionally, the proposed remedial measures are to remain flexible, depending on the nature and extent of the contamination identified and the conditions at hand.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Route) Part 6 of 6, Appendix G – Hotspot Protocol: - Contact with regulatory authorities should be raised earlier in this process and more prominent - The process does not include assessment of the lateral and vertical extent of the suspected contamination. The action “removal of the ‘hotspot’” may not be the most appropriate action in all cases - This procedure does not work for contaminated groundwater	
EA-012	Hydrology and Flood Risk Ground Conditions	Bedrock limestone	Issue Implication mitigation measures will only be implemented where bedrock limestone is unconfined. Impact Potential risk to controlled waters in any location where these conditions are not met. Solution For the avoidance of doubt, can the applicant confirm the mitigation measures will be implemented for the whole site, not just where these conditions are met. Additional narrative/ explanation (if necessary) We agree with the overview of Blisworth Limestone Formation (BLF), and the	Applicant confirms that the mitigation measures outlined in the OCEMP Revision A [EX1/GH7.1_A], OOEMP Revision A [EX1/GH7.2_A] and ODS Revision A [EX1/GH7.3_A] will be applied site-wide. The focus was to emphasize the importance of measures, particularly in areas where the Principal Aquifer is unconfined by clay-rich superficial deposits (e.g., the Oadby Member), such as in Green Hill F, due to its increased sensitivity. While the Principal Aquifer remains a key controlled water receptor across the site, the sensitivity is lower in areas where overlying clay-rich formations are present, creating a natural barrier. Nevertheless, mitigation measures



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			associated assessment of risks in Section 22.8.15. It states: "In the areas where the BLF is unconfined and a slightly increased risk exists to sensitive groundwater receptors, the mitigation measures outlined within the CEMP, OEMP and DEMP will be implemented to reduce risk." It could be interpreted that where the BLF is not unconfined, the mitigation measures will not be implemented. This would apply to the vast majority of the site, and we strongly disagree with this instruction if it is intended in this way.	are to be implemented across the site for the protection of the Principal Aquifer.
EA-013	Hydrology and Flood Risk	Risk to controlled waters	Issue Incorrect use of sensitivity tables. Potentially significant effect concluded to be "not significant". Impact Risk to controlled waters if insufficient mitigation is in place. Solution Ensure sensitivity tables are used correctly. Review Moderate significance of impact to principal aquifer and provide detail about additional mitigation which will be used to manage the potentially significant impacts. Additional narrative/ explanation (if necessary) The applicant states that, where principal aquifer is unconfined, there is a High to	The Applicant notes the Environment Agency's comments. Risks to controlled waters are assessed in the ES Chapter 22: Ground Conditions and Contamination [EX1/GH6.2.22_A] and the Water Framework Directive Assessment Revision A [EX1/GH7.22_A]. Chapter 22 applies the receptor sensitivity and significance criteria set out in Tables 22.3 to 22.5. For unconfined Principal Aquifers, a receptor sensitivity of High to Medium and a Low magnitude of effect was identified, giving a classification of "Moderate to Moderate/Minor." As defined in paragraph 22.4.13 of the ES Chapter 22: Ground Conditions and Contamination [EX1/GH6.2.22_A], effects of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Medium Sensitivity and Low Magnitude, which has a worst-case Moderate significance of impact with embedded mitigation, but could also be Moderate/Minor significance. This agrees with Table 22.5, the significance matrix. The applicant goes on to conclude this is “not significant”. The definition in 22.4.13 is that “Moderate/Minor” and lesser effects can be defined as “not significant”. As such, Moderate significance should be treated as Significant, which the applicant has not done. Further mitigation may be required to manage the significant risks to controlled waters where principal aquifer is unconfined. We require further information to provide surety this is in place. Significant risk to principal aquifers should be included in Chapter 26 (summary of significant effects).	Moderate/Minor or less are considered not significant, whereas Moderate effects are considered significant. The Applicant considers that this assessment has been applied correctly and consistently within the Environmental Statement. The outcome of “Moderate to Moderate/Minor” reflects the conservative nature of the methodology. The matrix applied resulted in two conflicting outcomes and therefore, it was necessary to apply professional judgement to determine the overall significance. In addition, the inclusion of embedded mitigation incorporated into the Scheme design further reduces risk, confirming that the effects will be ‘non-significant’. These mitigation measures are secured through the OCEMP Revision A [EX1/GH7.1_A], the OSMP [APP-550], and the OBSSMP Revision A [EX1/GH7.7_A], and include pollution prevention controls, lined containment for hazardous materials, firewater isolation and removal procedures, and strict requirements for the handling and storage of soils and fuels.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				On this basis, the Applicant maintains its conclusion that the residual effects on controlled waters are not significant. This conclusion is consistent with the findings of the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] , which confirms that the Scheme will not result in deterioration of WFD water body status.
EA-014	Hydrology and Flood Risk	Water Framework Directive	Issue Very limited information or discussion on WFD Groundwater bodies. No proposed mitigation (Section 8) specifically mentions groundwater. We are concerned WFD Groundwater bodies have not been fully assessed or understood. Impact Potential risk to WFD Groundwater bodies if insufficient assessment. Solution Review data and discussion for WFD Groundwater bodies. Update relevant sections and revise conclusions accordingly. Additional narrative/ explanation (if necessary) Table 2 does not give the chemical status of groundwater bodies, which is one of the two basic classification categories. Annex A does not have tabulated WFD status for all groundwater elements, as it does for surface	The Applicant notes the Environment Agency's comments. WFD groundwater bodies underlying the Scheme have been scoped into the assessment, as set out in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A]. The assessment concluded that the Scheme will not cause deterioration in the status of any groundwater body or prevent the achievement of WFD objectives. The Applicant acknowledges that the presentation of groundwater information in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] is less detailed than that provided for surface waters. However, the supporting baseline is provided in the ES Chapter 22: Ground Conditions



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			water. One of the WFD Groundwater bodies has an overall Poor classification. We expect a report such as this to detail the reason(s) for not achieving Good. Section 3.2.5 refers to the “objective year” for Good status, but the years are not given in the report. All WFD Groundwater bodies are all scoped in (Section 6.3.1), so the absence of further detail is concerning. The groundwater level and flow assessment (Section 2.6.1) is based on a single borehole record where groundwater was not recorded. The depth of borehole is not stated, but our records show it was only to 3.30mbgl. This is clearly not enough information to support a groundwater level and flow assessment. We are concerned the applicant has not fully considered, or does not understand, WFD groundwater bodies underlying the site.	and Contamination [EX1/GH6.2.22_A], which describes the underlying aquifer designations, geology and hydrogeology, and confirms that the Sites are not located within any Source Protection Zones. The groundwater bodies relevant to the Scheme are the Nene and Ouse management catchments, one of which has an overall Poor chemical classification. The reasons for status are identified within the Environment Agency’s published data, and no activities associated with the Scheme are identified as pressures contributing to poor chemical quality. Potential pathways for impact are limited due to the nature of the Scheme, which has very low water demand, no requirement for groundwater abstraction, and embedded pollution prevention measures secured through the OCEMP Revision A [EX1/GH7.1_A], the OSMP [APP-550] and the OBSSMP Revision A [EX1/GH7.7_A]. These measures include impermeable containment for hazardous materials, isolation and removal of any contaminated



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				firewater, and strict controls on soils, fuels and construction materials. On this basis, the Applicant maintains that the Scheme will not adversely affect WFD groundwater body status. The Applicant is content to clarify within the final detailed drainage design and management plans secured under the DCO how groundwater bodies have been considered, including reference to chemical status and objective years, to provide greater transparency, but no change to the assessment conclusions of the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] is required.
EA-015	Ground Conditions	Preliminary Risk Assessment	Issue Preliminary risk assessment lacking important information. Information from data search has not been used. Potential contamination sources have been ignored. CSM is not sufficient. Our comments from EIA Scoping have not been taken into account. See Additional narrative. Impact Potential sources of contamination have been identified, and risks cannot be ruled out. Other	A request for additional borehole data in ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A] did not appear to have been made during scoping. Previous scoping feedback has been reviewed with all requested amendments having been undertaken. Site-Specific Geology, BGS Borehole data has been added for all sites. See Section 2.2 of ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A]. In



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			potential sources have been ignored or overlooked. Solution Potential sources of contamination have been identified, and risks cannot be ruled out. Other potential sources have been ignored or overlooked. Additional narrative/ explanation (if necessary) At the scoping stage, we expressed concerns about the quality and completeness of reporting in this assessment. An updated report was not available at PEIR review stage. This report was updated for the Environmental Statement, but we have still found it to be inadequate. At scoping we queried why in Section 2.2, Site-Specific Geology section, only boreholes from Land at Grendon and Green Hill F had been reviewed. This has not been updated. We are pleased to see that groundwater levels from other boreholes, one for each panel area, are given later in the table. Section 2.4.2 states "Within the wider area, Sywell Airfield is located in the central area". This is immediately adjacent to the cable route and Green Hill C. We consider this is a potential source of contamination including PFAS (Per- and polyfluoroalkyl substances). It should be in the CSM (Section 3.3); it is in the CSM for Appendix 22.2, but not Appendix 22.1. PFAS are not listed as a potential contaminant	addition, ES Appendix 22.2 Geo-Environmental PRA Cable Route Corridor [EX1/GH6.3.22.2_A] includes nearby BGS Borehole data along the entire length of the cable route corridor. Both reports should be reviewed in conjunction. Wording on the location of Sywell Airfield in relation to Green Hill C has been amended in Section 2.4.2 ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A]. PFAS has been listed as a potential contaminant of concern associated with Sywell Airfield and included within the Conceptual Site Model (Section 3.0) of both ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A] and ES Appendix 22.2 Geo-Environmental PRA Cable Route Corridor [EX1/GH6.3.22.2_A]. Landfills associated with Earls Barton Quarry, Mears Ashby Road, Sywell Range, and OS Fields Bozeat are discussed and assessed within the relevant report sections, including the Conceptual Site Model (Section 3.0) of both ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A] and ES Appendix 22.2 Geo-Environmental



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			in Appendix 22.2, and we consider they should be. Risks from the Earls Barton Quarry (identified in Section 2.5) are not ruled out in the report text, and this source should be in the CSM. The fact that the landfill is off site does not preclude the risk to sensitive receptors on the site. Risk from Sywell Range landfills is ruled out in Appendix 22.1 Section 3.3 (CSM), but other landfills are not mentioned. The landfill is included as a source in Appendix 22.2 (PRA for cable route), Section 3.3 (CSM). There is no explanation why the assessment of risk differs between the two reports. We have records of historical landfills adjacent to the site boundary which are not mentioned in Appendix 22.1 at all (Ashby Road and OS Fields, Bozeat). Both landfills are included in the attached Envirocheck reports, along with numerous records of Local Authority Landfill Coverage. Some of these are within or immediately adjacent to the site boundary but have not been discussed in the main PRA and therefore are not considered in the main ES Chapter 22. This is a disappointing omission. Risks from historical landfills have not been assessed or understood. Information in the data search has not been used: The Ashby Road site is clearly listed in the Envirocheck report Order Number: 331730476_1_1, Slice D (Customer Reference: 93791.580478, dated 18 Jan-2024), in GH6.3.22.1 Appendix 22.1 Part 5 of 7, PDF page 651 (report page 21 of 38)	PRA Cable Route Corridor [EX1/GH6.3.22.2_A]. It should be noted that the historical landfill at OS Fields Bozeat is not included in ES Appendix 22.2 due to its distance from the Cable Route. In contrast, Sywell Range is discussed in greater detail within ES Appendix 22.2, given its closer proximity to the Cable Route, in comparison to Green Hill C. Landfills near Earls Barton Quarry, Sywell Range, and Mears Ashby Road (Barton Plant Ltd) are addressed in ES Chapter 22: Ground Conditions and Contamination [EX1/GH6.2.22_A]. The landfill at OS Fields Bozeat assessed in ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A], is located at closest approx. 75m north of the Green Hill F boundary and is therefore considered unlikely to be encountered during the development. The Hotspot Protocol has been amended in Appendix G of both ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A] and ES Appendix 22.2 Geo-Environmental PRA Cable Route Corridor [EX1/GH6.3.22.2_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			– it is not mentioned in Appendix 22.1 at all, but it is mentioned in Appendix 22.2 • The OS Fields site is clearly listed in the Envirocheck report Order Number: 331729469_1_1, Slice B (Customer Reference: 93791.580478, dated 18-Jan 2024), in GH6.3.22.1 Appendix 22.1 Part 6 of 7, PDF page 160 (report page 17 of 28) – it is not mentioned in either PRA	A Discovery Strategy will be implemented if suspected landfill material is encountered during construction or decommissioning. This is set out in the OCEMP Revision A [EX1/GH7.1_A] and secured in Schedule 2, Requirement 13 of the Draft DCO Revision A [EX1/GH3.1_A]. The EA historical landfill sites have been assessed for potential impacts on controlled waters (see Sections 22.8.11–22.8.14). Applicant acknowledges that ES Appendix 22.1 Geo-Environmental PRA [EX1/GH6.3.22.1_A] and ES Appendix 22.2 Geo-Environmental PRA Cable Route Corridor [EX1/GH6.3.22.2_A] were prepared at different times by different authors, alignment of both reports has been undertaken, with risks and recommendations outlined in the CSM. Both reports should be read in conjunction.
EA-016	Hydrology and Flood Risk	Flood Risk	Issue This section notes that with respect to the hydraulic modelling the Environment Agency are in general agreement with the approach. Whilst this is correct in terms of the general approach, several comments were raised on	The Applicant notes the Environment Agency's comments. Hydraulic modelling for the Grendon Brook, River Nene and Field Drain informed the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the hydraulic modelling for the Grendon Brook, River Nene, and Field Drain in February 2025. Impact There are uncertainties with the models which could mean that flood risk to the BESS and substation could be underestimated. Solution Please consider the comments raised on the respective hydraulic models by the Environment Agency in our emails to [redacted] dated 13 & 17 February 2025. A copy of these are attached in appendix 3. Additional narrative/ explanation (if necessary) Please consider the comments raised on the respective hydraulic models by the Environment Agency in February 2025 as these could have implications for the depths and extent of flooding at the BESS in the design scenario. Key comments were around the age of survey used within the respective hydraulic models, the age of the design hydrology used in the respective models, downstream boundary conditions (particularly with respect to the Grendon Brook), and validating the Station Road culvert dimensions used within the Field Drain direct rainfall modelling particularly given the large amount of attenuation upstream of this culvert which	annexes [APP-098 to APP-108]. Detailed comments from the Environment Agency in February 2025 are acknowledged and will be addressed through ongoing engagement and reflected in the Environment Agency Statement of Common Ground [EX2/GH8.3.5], with any refinements incorporated at detailed design and secured through Requirement 11 of the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			could be conveyed downstream if culvert dimensions are underestimated.	
EA-017	Hydrology and Flood Risk	Flood Risk Floodplain Storage	Issue Loss of floodplain storage. Impact Whilst sensitive infrastructure can be made resilient to flooding there could be a loss of floodplain storage Solution Once the uncertainties with the respective hydraulic models have been addressed, please confirm if there is any loss of floodplain storage from the BESS or substation infrastructure in the design event. Please make this clear in the final Flood Risk Assessment. Where this is the case the impact of any loss of storage should be quantified and appropriate compensatory storage should be provided if this could result in impacts to third parties. Additional comments It is acknowledged that in section 2.9.1 of the Flood Risk Assessment on page 18 it is described that the BESS will not displace water on the floodplain. The above comment relates to these uncertainties with the hydraulic model results and checking any impact on floodplain storage once the comments on the hydraulic models are addressed.	The Applicant notes the Environment Agency's comments. The ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] confirms that the BESS and substations are located within land mapped by the Environment Agency as partly Flood Zone 3, but that detailed site-specific hydraulic modelling demonstrates that in practice these areas are not subject to flooding in the design event. The modelling indicates that ground levels are above the 1 in 100 year + climate change level, and no loss of floodplain storage would occur. The Applicant recognises that Flood Zone mapping identifies indicative flood extents only, while the detailed modelling provides a refined, site-specific assessment. The results confirm that no compensatory storage is required, and the Applicant does not expect any refinements to the model to materially alter this conclusion. This position will be reviewed and confirmed once final hydraulic model comments have been addressed, with any necessary updates



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				incorporated into the Flood Risk Assessment and secured through the relevant DCO Requirement.
EA-018	Hydrology and Flood Risk Transport and Access	Temporary access crossings	Issue Assessment of flood risk to and from temporary access crossings. Impact There could be adverse flood risk impacts from crossing watercourses. Flood risk could be increased if temporary access crossings are not appropriately designed. Solution Flood risk impacts to and because of new crossings should be assessed quantitatively, Flood risk should not be increased because of new crossings. Culverts should be avoided in preference of clear span bridges. Additional comments Please note, we would be against any culverting of Main Rivers and would recommend against culverts for crossings over other Ordinary Watercourses although the Lead Local Flood Authority and the IDB would be the consenting authority for non-Main River watercourses. Any proposed crossings should be designed so that the soffit level sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance	The Applicant notes the Environment Agency's comments. As confirmed in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes [APP-098 to APP-108], temporary and permanent watercourse crossings will be designed to ensure no increase in flood risk, with preference given to clear span bridges over culverts. Where crossings are required, soffit levels will be set above the appropriate design flood level, and detailed designs will be prepared in consultation with the Environment Agency and Lead Local Flood Authority as relevant. Final specifications will be agreed at detailed design and secured through the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			probability (AEP) plus higher central climate change scenario (fluvial). For temporary crossings as part of the construction phase of the scheme, depending on the period for which these are in place it may be possible to use the present day (without climate change) 1% (1 in 100) AEP scenario although for longer periods of time climate change should be considered. In terms of determining flood levels at crossings, the Mannings equation could be used in the case of open span crossings over small ordinary watercourses. Where culverts are used the methods prescribed within the CIRIA Culvert Screen and outfall manual (C786) may be a useful reference to help determine appropriate sizing although it may be easier to develop simple 1d hydraulic models to understand the impact on water levels and to size crossings appropriately.	
EA-019	Hydrology and Flood Risk	Open channel flow calculations	Issue General Comment on Mannings open channel flow calculations. Impact Advice to applicant. Solution No action required. For information only. Additional comments The Mannings open channel flow calculations are now presented in Annex B of the respective	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			panel area Flood Risk Assessments (except for panel area B as there is no notable surface water or fluvial flood risk in this area). A comment was raised at the PEIR stage regarding including the Mannings calculations within the Flood Risk Assessment so that these can be appraised. This has now been addressed, and the appropriate information has been provided. Cross section maps are included along with the calculated peak flows based on the Revitalised Flood Hydrograph method (ReFH2) for each respective catchment. Check cross sections at key locations have been derived using 1 metre horizontal resolution Lidar data and cross section properties tables are presented which have been generated using Flood Modeller software. These show the relationship between water level and flow at the derived cross sections. This relationship is used as a “lookup” to determine the respective water levels for different flows. The generated flows and associated levels for the Credible Maximum scenario and sensitivity test appear reasonable. These checks validate the use of the Risk of Flooding from Surface water mapping as a suitable proxy for assessing flood risk in smaller catchments where there is no associated Flood Zone mapping.	
EA-020	Hydrology and Flood Risk	Flood Mitigation Measures	Issue The proposed flood mitigation measures set out here are considered acceptable. However,	The Applicant notes the Environment Agency's comments. Flood mitigation measures are set out in the ES Appendices 10.1 to 10.11



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			it is not clear from submitted layout plans where these will be required across the site. Impact The extent of development within the design flood extent (including an allowance for climate change) and required flood mitigation is difficult to determine. Solution Development plans showing solar panel layouts (and all other built infrastructure) overlaid with the design flood extent should be provided. This will clearly show where development interacts with areas at risk of flooding, and where mitigation will be implemented.	FRADS Revision A [EX1/GH6.3.10.1_A, APP-098 to APP-108], with infrastructure located outside the functional floodplain and solar panels only sited in areas of shallow flooding where appropriate resilience is achievable. While the FRA figures illustrate the design flood extents (including climate change) for each site, they do not show the illustrative development layouts, as final layouts will be confirmed at detailed design stage. Given the flexibility inherent in the DCO, the mitigation principles secured through the FRA and the DCO Requirements will be implemented in accordance with the final approved layouts once fixed. This ensures that the agreed mitigation principles and design thresholds are applied consistently, even if minor layout refinements occur before construction.
EA-021	Hydrology and Flood Risk	Horizontal Directional Drilling (HDD)	Issue The installation of the cable route will require crossings of Main River Watercourses. HDD is the preferred method. Impact	The Applicant notes the Environment Agency's support for the use of HDD beneath Main Rivers. As confirmed in ES Appendix 10.2: FRADS Annex A Cable Route Corridor [APP-098 and APP-099], all Main



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Construction works have the potential to impact the bed and banks of watercourses, and flood defence assets where present. Solution We would support the use of HDD for crossings beneath Main Rivers. Further details will be required showing detailed locations of proposed crossing points and works areas.	River crossings will be delivered using HDD. Detailed crossing methodologies, including precise locations and work areas, will be developed in consultation with the Environment Agency at the detailed-design stage. The final methodologies for HDD works will be subject to plan approval under the Environment Agency's protective provisions and referenced within the OCEMP Revision A [EX1/GH7.1_A], ensuring that all crossings are designed and delivered in accordance with the Environment Agency's requirements and flood-risk controls.
EA-022	Hydrology and Flood Risk	Environmental Permits	Issue Comments here note that 'the applicant is seeking disapplication of environmental permits (for works in, over, or near a Main River)'. No discussion has yet taken place regarding disapplication. Impact Disapplication of the Environmental Permitting Regulations may not be appropriate in all instances. Solution	The Applicant notes the Environment Agency's comments. In Part 1 of the Draft DCO Revision A [EX1/GH3.1_A] seeks disapplication of the Environmental Permitting Regulations in respect of flood risk activity only, which would apply to works in, over or near a Main River. The Applicant has also included protective provisions for the EA in Part 7 of Schedule 15 to the draft DCO, providing the EA with appropriate oversight for works that may affect Main Rivers. The



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			We would encourage discussion on any proposed disapplication as soon as possible. Suitable plans and supporting details of proposed activities should be submitted for review. Additional narrative / explanation (if necessary) If the Applicant is seeking to disapply any of the permitting legislation, they should contact the Environment Agency as early as possible. The Environment Agency will consider requests to disapply on a case-by-case basis. However, when approached, there are some principles the Environment Agency will consider following a disapplication request: • The activity will have a low environmental risk, • The activity should either be temporary, or it can be agreed as part of the construction phase, • The activity will not require any on-going monitoring or subsequent enforcement of any defined limits, • The activity is unlikely to be classed as High Public Interest or has the potential to generate high public interest. The Environment Agency will decide whether an application is of high public interest on a case-by-case basis. To reach a decision, all relevant information is considered,	Applicant recognises that disapplication is subject to agreement with the Environment Agency and will continue to engage to provide any additional information required for the EA to be comfortable with this disapplication. The Applicant acknowledges the principles set out by the Environment Agency for considering disapplication requests, including demonstrating low environmental risk, the temporary nature of activities, and the absence of any requirement for ongoing monitoring or enforcement. Supporting details of proposed activities, including method statements for Main River crossings, are provided in the ES Appendices 10.1 to 10.11 FRADS Revision A [EX1/GH6.3.10.1_A, APP-098 to APP-108], with HDD confirmed as the method for all Main River crossings. The Applicant will continue engagement with the Environment Agency to ensure that the proposed approach is fully understood and that sufficient information is provided to support the disapplication request.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			including: • Whether the interest relates to issues regulated under an environmental permit, • The breadth and scale of interest – for example, the number of different sources such as individuals, interest groups, businesses, local councillors, media and whether there is ongoing engagement from the local MP • Whether the interest is, or is likely to be, sustained for a period of time. The Applicant should provide sufficient information with their request to disapply for the Environment Agency to be able to make the above decisions about the activity.	
EA-023	Hydrology and Flood Risk Ecology and Biodiversity	Open cut crossings Fish	Issue Open cut crossing proposed where fish may be present. Impact Direct impact-pathway to fish which could permanently damage habitat. Solution While we support the proposed mitigation measures (with the exception of the timing condition, see below comment) for fish in areas where open-cut crossings are planned, this approach does not align with the mitigation hierarchy, which prioritises avoidance as the first step. Therefore, in locations where fish	Watercourse crossing points where trenchless techniques (such as horizontal directional drilling (HDD)) have been committed to are identified in the Crossing Schedule [APP-562]. These include crossings of the most sensitive watercourses with the greatest risk of impacts. At all other crossing points, optionality for HDD/open-cut trenching is retained, with final construction methodologies to be informed by updated site inspections during the construction phase, as set out in the OEPMS [EX1/GH7.5_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			habitat is present, trenchless crossing techniques should be the preferred method.	An assessment of effects for either method, as well as appropriate mitigation measures for fish species in instances where open-cut trenching is utilised, are discussed in ES Chapter 9 Ecology and Biodiversity [EX1/GH6.2.9_A] .
EA-024	Ecology and Biodiversity	Open cut crossings Fish	Issue Proposed period of avoidance of work does not include coarse fish spawning. Impact Damage to spawning habitat, loss of fish eggs and disturbance to spawning fish. Solution The period of avoidance of work should run from October to June 16th (inclusive) in order to protect salmonids, European eel and coarse fish.	The Applicant discussed which with the Environment Agency in a meeting on 01/10/2025. The Applicant notes this comment, and, as agreed, will seek to either avoid open-cut trenching works on the affected watercourses during the coarse fish spawning period (15th March - 15th June inclusive), or otherwise pre-commencement survey work will be undertaken to establish whether the avoidance period is required for each relevant watercourse crossing point. This may comprise habitat suitability assessments to establish whether suitable spawning habitat is present at each crossing point, or fish surveys to determine whether fish which may spawn in the watercourse are present/likely absent. The Environment Agency confirmed during the meeting that features characterised as wet ditches can be scoped out of this timing restriction,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				as this only applies to permanently wet watercourses with a flow. The cable installation methodology to be used at each of the affected crossing points, as well as any required mitigation measures for spawning/migrating fish, would be discussed and agreed with the EA/relevant consenting body post-DCO consent, prior to work commencing. An updated version of the OEPMS Revision A [EX1/GH7.5_A] is submitted at Deadline 1 which outlines this approach.
EA-025	Ecology and Biodiversity	Fish	Issue Although the second P. 9.9.31 on p. 177 is the location of a response to the comments in Table 9.2, the response leaves something to be desired. It does not address the points made re. classification and possible damage to headwater and spring fed watercourses, just mentions possibilities for enhancement works. Impact Not fully considering the previous comments and points may lead to unintended damage to spring fed watercourses and headwaters. Solution Make proper reference to spring fed watercourses and habitats that they support,	In determining the status of watercourses across the Sites, a desk study was initially conducted, consulting datasets such as the EA Statutory Main Rivers, Natural England's Priority River Habitat - Rivers (England) mapping, OS Master Mapping, and EA Risk of Flooding from Surface Water mapping. Following this exercise, all watercourses within the site boundaries were subject to a ground-truthing walkover survey, where additional factors such as watercourse morphology, whether the watercourse held water, and site context were taken into account. If



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			possibly making sure that these features are protected from interference by buffer zones. Additional narrative/ explanation (if necessary) There appears to be a mismatch in paragraph numbering and there are duplicates of paragraph numbers. This leads to confusion as to which part of the document should be consulted, e.g. table 9.2 on p. 64 refers to P 9.9.31 to locate the correct response, however there is a 9.9.31 on p. 157 and another on p. 177. Please check the paragraph numbering – for ease of identification, it appears that the paragraphs start to be renumbered after P. 9.9.111– the next paragraph is numbered 9.9.1 (p. 172)	the watercourse was deemed to qualify as an 'Other River or Stream' under Biodiversity Net Gain criteria, then it was also subject to a MoRPh survey to ascertain its BNG condition. It is therefore considered that all reasonable steps have been taken to characterise watercourses in the ecological impact assessment. If the EA is aware of particular watercourses which may have been incorrectly characterised, then the Applicant can review these and amend the assessment if appropriate. The Applicant acknowledges the error in paragraph numbering in ES Chapter 9 Ecology and Biodiversity [EX1/GH6.2.9_A], and this is corrected in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A].
EA-026	Hydrology and Flood Risk	Water Framework Directive	Issue Outdated terminology re. Hydromorphological regime "Supports Good", new terminology is "not high". Impact "Supports good" may imply that watercourses do not require improvements to the hydromorphological status, as they already support good environmental status. The new	The Applicant notes the Environment Agency's comments. The terminology "Supports Good" in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] reflected the Cycle 2 classifications available at the time of submission. The Applicant acknowledges that Cycle 3 classifications now use the updated



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			terminology “not high” reflects that improvements to the hydromorphological regime can and possibly should be made. Solution Use correct terminology	terminology “Not High” and will update this wording within the Water Framework Directive Assessment to ensure consistency with the most recent Environment Agency datasets. This is a minor clarification only and does not require any new evidence or modelling. n to ensure consistency with the most recent Environment Agency datasets.
EA-027	Hydrology and Flood Risk	Flood Modelling	Field Drain 2d direct rainfall model The model is broadly reasonable, however, there are some uncertainties with the hydraulic modelling which should be investigated further so that there is confidence that these uncertainties will not impact flood risk at the proposed BESS site. Please see the key comments on the model review below. Further details can be found in the attached model review spreadsheet. 1. Please undertake a sensitivity test on channel bed levels perhaps just applying the point inspected values to each z point (rather than the lowest value within a 5-metre radius) and re-run the model. This will help to quantify any impact from the uncertainties associated with channel bed levels and the impact at the BESS site. Please see worksheet 2D_Model_Build within the attached spreadsheet	The Applicant notes the Environment Agency's comments. A sensitivity test on channel bed levels will be undertaken for the Field Drain 2D direct rainfall model, with results reported in Hydraulic Modelling Report [EX2/GH8.2.1] at Deadline 2.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EA-028	Hydrology and Flood Risk	Flood Modelling	It would be sensible to validate the Station Road culvert dimensions by undertaking a survey of the upstream and downstream opening. If this is not possible then some sensitivity testing of culvert dimensions is critical given the large amount of attenuation upstream which could be conveyed downstream if culvert dimensions are underestimated. Please see worksheet 2D_Structures within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. Following discussion with the Environment Agency, additional sensitivity testing of the Station Road culvert dimensions is being undertaken to confirm the robustness of the hydraulic model. This is a precautionary exercise and does not reflect any disagreement with the model findings. The culvert dimensions will be validated by survey where practicable, and the updated model results will be documented in the Hydraulic Modelling Report (HMR) to be submitted as a standalone report at Deadline 2. The testing is not anticipated to result in any material change to the conclusions of the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A]. The final HMR will be shared with the Environment Agency and Lead Local Flood Authority during Examination to demonstrate that the model outputs and flood-risk conclusions remain robust.
EA-029	Hydrology and Flood Risk	Flood Modelling	3. At present a slope of 0.01 metres per metre has been applied at the downstream boundary. Sensitivity testing should be undertaken on the downstream boundary conditions, particularly	The Applicant notes the Environment Agency's comments. Additional sensitivity testing of the downstream boundary conditions and Manning's



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			as the Grendon Brook and River Nene result in flooding in the vicinity of the downstream boundary. The influence that the downstream boundary conditions have on model results should be quantified through some sensitivity testing. Please also undertake sensitivity testing on Mannings Roughness. Please see worksheet Model_Performance within the attached spreadsheet.	roughness coefficients is being undertaken to confirm the robustness of the hydraulic model, as discussed with the Environment Agency. The results will be presented in the Hydraulic Modelling Report (HMR) to be submitted as a standalone report at Deadline 2. This testing will quantify the influence of boundary conditions on the model results and provide assurance that the conclusions of the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] remain valid. No change to the assessment findings is anticipated.
EA-030	Hydrology and Flood Risk	Flood Modelling	4. It would be sensible to compare the outputs from the direct rainfall model at the catchment outlet with the calculated total flow outputs from the ReFH2 hydrological approach. This would be useful as it would help determine how well the direct rainfall model is performing and whether aspects such as depression storage and attenuation are influencing model results. Do the outputs align or are there notable differences? Please see worksheet Model_Performance within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. A comparison of direct rainfall model outputs at the catchment outlet with ReFH2 hydrological flow estimates will be undertaken to confirm model performance and identify any differences. This will be reported in the Hydraulic Modelling Report [EX2/GH8.2.1] at Deadline 2.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EA-031	Hydrology and Flood Risk	Flood Modelling	5. Please review the warning and check messages and update the model as necessary. Please see worksheet Model_Stability within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. Model warning and check messages are being reviewed and are reported in the Hydraulic Modelling Report [EX2/GH8.2.1] at Deadline 2. Outcomes will be documented in the Hydraulic Modelling Report appended to the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] .
EA-032	Hydrology and Flood Risk	Flood Modelling	6. The Environment Agency do not hold any recorded flood outlines for this unnamed ordinary watercourse, this does not mean that historic flooding has not occurred just that the Environment Agency do not hold any records of flooding. Do the Lead Local Flood Authority have any historic data to validate the model outputs against? Please see worksheet Model_Performance within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. Enquiries have been made with the Lead Local Flood Authority regarding historic flood records for the unnamed ordinary watercourse. No such records have been identified to date, but the Applicant will continue to engage with the LLFA to confirm whether any information is available to support validation of the model outputs. This will be set out in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.
EA-033	Hydrology and Flood Risk	Flood Modelling	7. As this is a direct rainfall model has any consideration been given to filtering the model results so that flood risk from the unnamed ordinary watercourses can be properly visualised. Typically, this is done by applying a depth or hazard threshold to the data. Please	The Applicant notes the Environment Agency's comments. Filtering of the direct rainfall model outputs will be undertaken using appropriate depth or hazard thresholds to aid interpretation of flood risk from the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			see worksheet Flood_Extent_Check within the attached spreadsheet.	unnamed ordinary watercourses. This will be set out in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.
EA-034	Hydrology and Flood Risk	Flood Modelling	Please produce a hydraulic model and hydrology report for this model build. This should be included as an appendix to the Flood Risk Assessment and should include the following information: 1. Details on the source information used to construct the model geometry 2. Details regarding the model hydrology and in particular the ReFH2 model parameters and rainfall used. 3. Details regarding whether any calibration or verification of the model results have been undertaken (for example if the LLFA have any data to validate against) 4. Details on any sensitivity tests undertaken. 5. Details on associated uncertainties and limitations	The Applicant notes the Environment Agency's comments. A Hydraulic Modelling Report [EX2/GH8.2.1] is being produced and will be submitted at Deadline 2. The report sets out the model geometry, hydrology (including ReFH2 parameters and rainfall), any calibration or verification undertaken, sensitivity tests, and associated uncertainties and limitations.
EA-035	Hydrology and Flood Risk	Flood Modelling	Grendon Brook Flood Modeller Model The model setup is broadly reasonable and is based on the existing Environment Agency hydraulic model of the Grendon Brook (Halcrow, 2013). There are however some areas for further consideration which are	The Applicant notes the Environment Agency's comments regarding the age of survey data in the Grendon Brook model. As part of the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2, the Applicant is considering options such



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			summarised below. Further details can be found in the attached model review workbook. Hydraulic Model Comments 1. Given the age of the survey used within the hydraulic model (2008) it would be sensible to capture some check surveyed channel cross sections in the vicinity of the Battery Energy Storage System location or alternatively undertake a sensitivity test on channel bed levels in this area. Alternatively, it might be possible to refer to other sensitivity tests or more conservative annual exceedance probability scenarios (for example the 0.1% plus climate change scenario) to demonstrate that the development remains resilient and will not increase flood risk to third parties given some of the uncertainties associated with the age of the survey used for the channel. Please see comment 3.3 within worksheet 1D_Model_Build within the attached spreadsheet.	as localised check survey, sensitivity testing of channel bed levels, or use of conservative design scenarios to confirm the Scheme's resilience.
EA-036	Hydrology and Flood Risk	Flood Modelling	2. Please review water level results at reservoir unit GB3807lspd. These appear quite low when compared to existing Environment Agency model results. This reservoir unit is important as it is adjacent to the BESS area. The lower water levels could be due to the application of downstream boundary conditions within the model or potentially spill linkages to the reservoir unit itself. Please see comment 4.1 within worksheet 1D_Boundary_Conditions within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. Water level results at reservoir unit GB3807lspd will be reviewed as part of the modelling update, including checks on downstream boundary conditions and spill linkages. Findings and any resulting refinements will be set out in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EA-037	Hydrology and Flood Risk	Flood Modelling	3. Please review the design hydrology to confirm that the design event is still representative and is not underestimated or alternatively demonstrate that flood risk to the proposed development and in particular the Battery Energy Storage System and solar panel area F is insensitive to changes in flood flows. Furthermore, it is noted that a storm duration of 9 hours has been considered. Please confirm if any consideration has been given to other storm durations such as 7, 12 and 15 hours? Please document any checks undertaken on the hydrology within a model report which should form an appendix to the Flood Risk Assessment. Please see comment 4.2 within worksheet 1D_Boundary_Conditions within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. The design hydrology will be reviewed and sensitivity testing undertaken (including alternative storm durations such as 7, 9, 12 and 15 hours) to confirm representativeness or demonstrate insensitivity of flood risk at the Battery Energy Storage System and panel area F to changes in flows. Checks and outcomes will be documented in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.
EA-038	Hydrology and Flood Risk	Flood Modelling	4. Please consider the application of downstream conditions within the hydraulic model. It appears that the applied water levels could be underestimated. An approach like the existing Environment Agency hydraulic model should be taken or alternatively sensitivity tests should be undertaken to confirm that the downstream boundary conditions have no impact on flood risk within the order limits for the development. Please see comment 4.3 within worksheet 1D_Boundary_Conditions within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. Downstream boundary conditions will be reviewed, and either aligned with the existing Environment Agency model approach or tested through sensitivity analyses to confirm no material impact within the Order Limits. Findings will be documented in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.
EA-039	Hydrology and Flood Risk	Flood Modelling	5. Please include a map within the model report/Flood Risk Assessment which compares model results to recorded flood outlines.	The Applicant notes the Environment Agency's request. A comparison map of model outputs against



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Recorded flood outlines held by the Environment Agency can be downloaded from the Defra Data Services Platform (environment.data.gov.uk). Please see comment 15.3 within worksheet Model_Performance within the attached spreadsheet.	recorded flood outlines (sourced from the Defra Data Services Platform) will be produced and included within the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.
EA-040	Hydrology and Flood Risk	Flood Modelling	6. Please review the design flood extent in the vicinity of the land designated for the Battery Energy Storage system. The design flood extent is smaller when compared to the Environment Agency's existing 1% (1 in 100) Annual Exceedance Probability extent for the Grendon Brook (Halcrow, 2013). Whilst this does not necessarily indicate that the model schematisation is incorrect it does warrant a check to establish why these differences might be occurring, particularly given the sensitivities associated with the BESS. Please see comment 15.7 within worksheet Model_Performance within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. Differences between the design flood extent and the existing Environment Agency model of the Grendon Brook will be reviewed as part of the modelling update, with outcomes reported in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.
EA-041	Hydrology and Flood Risk	Flood Modelling	7. Please ensure depth grids are produced for the full extent of the hydraulic model where this intersects with the order limits for the development. At present the model extends into panel area F, however, there is no associated flood extent mapping for this portion of the model. Please see comment 2.4 within worksheet Model_Scenarios within the attached spreadsheet.	The Applicant notes the Environment Agency's comments. Depth grids will be produced for the full model extent within the Order Limits, including panel area F, and included in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EA-042	Hydrology and Flood Risk	Flood Modelling	Please produce a hydraulic model report for this model build. This should be included as an appendix to the Flood Risk Assessment and should include the following information: 1. Details on the source information used to construct the model geometry 2. Details regarding the model hydrology and any checks that have been undertaken on this to confirm its suitability to assess present day baseline flood risk 3. Details on any sensitivity tests undertaken. 4. Details on associated uncertainties and limitations 5. The rationale for not undertaking "with development" modelling	The Applicant notes the Environment Agency's request. A Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2 which will set out geometry, hydrology, sensitivity tests, uncertainties and the rationale for not undertaking with-development modelling.
EA-043	Hydrology and Flood Risk	Flood Modelling	Middle Nene Flood Modeller Model The model setup is broadly reasonable and is based on the existing Environment Agency hydraulic model of the River Nene (Halcrow, 2013). There are however some areas for further consideration which are summarised below. Further details can be found in the attached model review workbook. Hydraulic Model Comments 1. Given the age of the survey used within the hydraulic model (1980's/1990s) it would be sensible to capture some check surveyed channel cross sections in the vicinity of the order limits for the development or alternatively	The Applicant notes the Environment Agency's comments. The age of survey data in the Middle Nene model is acknowledged. As part of the modelling update, the Applicant will consider options such as localised check survey or sensitivity testing of channel bed levels to confirm resilience. Outcomes will be reported in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			undertake a sensitivity test on channel bed levels, perhaps increasing bed levels between cross sections a6597 and a6360u to help understand the impact that uncertainties in the surveyed channel cross section geometry might have on model results in the area of interest. Of particular concern is the Battery Energy Storage System (BESS) area as this is in an area near the design flood extent.	
EA-044	Hydrology and Flood Risk	Flood Modelling	2. Please review the design hydrology to confirm that the design event is still representative and is not underestimated or alternatively demonstrate that flood risk to the proposed development, and particularly the Battery Energy Storage System (BESS) is insensitive to changes in flood flows. Please document any checks undertaken on the hydrology within a model report which should form an appendix to the Flood Risk Assessment.	The Applicant notes the Environment Agency's comments. The design hydrology is being reviewed, including sensitivity to flow assumptions, to confirm the representativeness of the design event. Findings will be set out in the Hydraulic Modelling Report [EX2/GH8.2.1] which will be submitted at Deadline 2.
EA-045	Hydrology and Flood Risk	Flood Modelling	3. Please undertake sensitivity testing on channel roughness. For information, the summer sensitivity model geometry file MiddleNene_Section1to6_2012-08 28_summer_XW02.dat may be of use for this assessment	The Applicant notes the Environment Agency's comments. Sensitivity testing on channel roughness is being undertaken and reported in the Hydraulic Modelling Report appended to the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] .
EA-046	Hydrology and Flood Risk	Flood Modelling	4. Given the age of the hydraulic model, it would be sensible to verify that it still accurately represents flooding mechanisms for the River Nene in the area of the proposed development.	The Applicant notes the Environment Agency's comments. The Middle Nene model will be reviewed to confirm it adequately represents



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			This could be achieved by running a verification event for a more recent flood through the hydraulic model or alternatively demonstrating the sensitivities associated with model schematisation and design flow magnitude in the area interest. For example, if it can be demonstrated that model results in the area of interest are relatively insensitive to changes in flow, channel representation given the age of the survey, and mannings roughness this could limit the need for further model verification.	local flood mechanisms, with sensitivities or verification against recent flood events considered where appropriate. Results will be presented in the Hydraulic Modelling Report appended to the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] .
EA-047	Hydrology and Flood Risk	Flood Modelling	5. Please include a map within the model report/Flood Risk Assessment which compares model results to recorded flood outlines. Recorded flood outlines held by the Environment Agency can be downloaded from the Defra Data Services Platform (environment.data.gov.uk)	The Applicant notes the Environment Agency's comments. Comparison maps of model results with recorded flood outlines will be prepared and included in the Hydraulic Modelling Report appended to the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A]
EA-048	Hydrology and Flood Risk	Flood Modelling	6. Please review the design flood extent in the vicinity of the land designated for the Battery Energy Storage System. The design flood extent is smaller when compared to the Environment Agency's existing 1% (1 in 100) Annual Exceedance Probability extent for the Nene (Halcrow, 2013). Whilst this does not necessarily indicate that the model schematisation is incorrect it does warrant a check to establish why these differences might be occurring, particularly given the sensitivities associated with the BESS.	The Applicant notes the Environment Agency's comments. Differences in design flood extent for the Battery Energy Storage System area compared to the existing Environment Agency model of the Nene will be reviewed, with outcomes documented in the Hydraulic Modelling Report appended to the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EA-049	Hydrology and Flood Risk	Flood Modelling	Please produce a hydraulic model report for this model build. This should be included as an appendix to the Flood Risk Assessment and should include the following information: 1. Details on the source information used to construct the model geometry 2. Details regarding the model hydrology and any checks that have been undertaken on this to confirm its suitability to assess present day baseline flood risk 3. Details regarding whether any calibration or verification of the model results have been undertaken 4. Details on any sensitivity tests undertaken. 5. Details on associated uncertainties and limitations 6. The rationale for not undertaking "with development" modelling	The Applicant notes the Environment Agency's request. A Hydraulic Modelling Report will be produced for the Middle Nene model build and appended to the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] covering geometry, hydrology, calibration or verification, sensitivity testing, uncertainties, and the rationale for not undertaking with-development modelling.



3.3 Historic England (HBMCE)

Table 3.3: [RR-1228](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HE-001	Cultural Heritage	Introduction	Notice of Acceptance of an application for a Development Consent Order ("DCO") by the Planning Inspectorate (on behalf of the Secretary of State) under Section 56 of the Planning Act 2008 Historic England The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Culture, Media and Sport (DCMS).	The Applicant notes this comment.
HE-002	Cultural Heritage	The Scheme	Proposal Green Hill Solar Farm is a proposed new solar farm with battery storage and supporting grid connection infrastructure within the administrative areas of West Northamptonshire Council, North Northamptonshire Council and Milton Keynes City Council.	The Applicant notes this comment.
HE-003	Cultural Heritage	Pre-submission consultation	Representation We are engaged in positive pre-application discussion with the applicant and have provided comments on the Preliminary Environmental Impact Report at	The Applicant agrees that a positive pre-application discussion has been ongoing and will continue to undertake constructive engagement during the examination period.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			S42 stage. The following comments set out representation based upon the information submitted to date. We look forwards to further constructive engagement with the applicant.	The Applicant is progressing the Historic England Statement of Common Ground [EX2/GH8.3.4] .
HE-004	Cultural Heritage	Heritage assets	Setting of Designated Heritage Assets Historic England previously engaged with this project in regard to the Preliminary Environmental Impact Report (PEIR), and a number of matters were raised in regards to the setting of several high graded built heritage assts as well as conservation areas close to the proposed scheme.	The Applicant notes this comment.
HE-005	Cultural Heritage	Heritage assets Conservation Areas	We raised concerns that the solar panels may have a visual relationship with the Mears Ashby Conservation area, particularly to the east of Mears Ashby. Additionally, we raised the issue of some highly graded assets in both the settlements of Walgrave and Old, and the potential change in setting to those. The offsetting of the panels to the south and east of the conservation area will help to mitigate visual impact with the addition of landscaping reinforcement and additional planting.	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] , has assessed the potential impact of the scheme on built heritage assets. It has been identified a Moderate adverse effect would occur as a result of the Scheme at Mears Ashby Conservation Area (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). Mitigation has been provided in the form of removal of solar panels from Fields DF4, EF9, EF16, EF34 Offsets (Fields DF1 to DF3, EF4 EF5, EF10-EF15, EF17) and enhanced screening of existing hedgerows and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Applicant considers the removal of solar panels from Field AF1 and offset of panels in Field AF2, as well as enhanced screening of existing hedgerows of fields to be sufficient to mitigate impacts to designated assets located in Walgrave and Old to a level that is not significant.
HE-006	Cultural Heritage	Heritage assets Conservation Areas	Furthermore, the settlements at Bozeat, Grendon, Easton Maudit may also experience change in setting from the proposal, which includes two conservation areas and multiple listed buildings. However, views of the church towers has been considered and the proposal to remove panels from the site area in between Grendon and Easton Maudit is welcomed.	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] , has identified a Moderate adverse effect would occur as a result of the Scheme at the Grade I Listed Church of St Peter and St Paul (NHLE 1189610), Grade II* Listed 22 High Street (NHLE 1040784) and Easton Maudit Conservation Area. A Neutral effect has been identified to Bozeat and Grendon Conservation Areas (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). The removal of solar panels from Fields FF13, FF14, FF16, FF22, FF27 and FF28 has been proposed to mitigate impacts to the Grade I Listed Church of St Peter and St Paul (NHLE 1189610), Grade II* Listed 22 High Street (NHLE 1040784) and Easton Maudit Conservation Area. A visual corridor has been retained between Grendon and Easton Maudit conservation areas. A visual corridor has also been retained between churches (including along PROW). Offsets (Field FF15, FF25 and FF26) and enhanced



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				screening of existing hedgerow and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area.
HE-007	Cultural Heritage	Site Layout	The site layout and landscaping proposal is clearly well thought out here and considers the heritage considerations with the existing topography and landscape.	The Applicant agrees with this comment. The design of the Scheme has been established with consideration to the relationship between heritage assets and the natural topography and landscape in which they are located.
HE-008	Cultural Heritage	Heritage viewpoints	As with Site E, heritage viewpoints would be useful to aid assessment of the effectiveness of the proposed landscaping mitigation in additional locations around these settlements.	For Site E, eight viewpoints are identified (see ES Figure 8.10.3: Viewpoint Locations Green Hill C, D and E [APP-311]): VP16, VP17, VP18, VP19, VP20, VP21, NN4 and NN5. Also see HVP 2 contained in Appendix 2 of ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] .
HE-009	Cultural Heritage	Registered Park and Garden	We note the proximity of Grade I Registered Park and Garden (RPG) of Castle Ashby. We note the topography and the screening proposals to would reduce the setting impact to the park and garden, as discussed as part of the prior engagement.	The cultural heritage assessment has identified a Neutral effect would occur as a result of the Scheme at Grade I Registered Park and Garden (RPG) of Castle Ashby (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). Mitigation includes retention of a visual corridor between the RPG and PROW in Field FF28. Enhanced screening of existing hedgerow and tree belts in areas that front the RPG will also be provided.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HE-010	Cultural Heritage	Heritage Assets	Through our pre-application engagement it would appear that careful consideration has been given, with a multidisciplinary approach taken regarding setting and indirect impact to designated heritage assets. It is likely that there will be a degree of harm to the setting of numerous heritage assets arising from the proposed development. As referenced above, landscaping and how it is implemented will be a major factor in mitigating harm through visual impact to the historic environment.	The Applicant agrees with this comment and mitigation through landscaping to minimise visual impact has been proposed ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed the potential impact of the scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Chapter 12: Cultural Heritage [APP-049] for embedded mitigation and Section 12.11 for additional mitigation). No direct impacts have been identified to designated heritage assets. Identified impacts would be indirect and related to elements of their setting that contribute to their significance.
HE-011	Cultural Heritage	Buried Archaeology Archaeological Mitigation Strategy	Buried Archaeological remains We note that none of the proposed areas contain any designated archaeological assets (such as Scheduled Monuments, Registered Battlefields). The documentation supplied outlines the evaluative works that have been completed to date, including geophysical survey and evaluation trenching. We note the areas of denser archaeology identified, particularly in reference to area F, however we also welcome the approach taken in the Archaeological Mitigation Strategy (AMS) that dictates several additional areas for trial trench evaluation and strip map and sample	The Applicant is currently in conversation with WNC, NNC and MKC about the mitigation strategy and will continue detailed engagement regarding the Archaeological Mitigation Strategy (AMS). This is secured in Schedule 2, Requirement 12 of the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			excavation; we welcome this approach, and encourage further detailed engagement with the relevant local planning authority and ourselves as this work in undertaken.	
HE-012	Cultural Heritage	Buried Archaeology Archaeological Mitigation Strategy	We also note that certain areas have been identified for in situ preservation (non-intrusive construction methodology); we encourage some further conversation with ourselves and the local planning authorities about the effectiveness of this approach long term. One aspect to note, is the AMS denotes areas of 'no solar development'. We would question the applicant regarding these areas. While they may not be proposed for 'solar development', we would ask that the applicant engages further with us regarding any other elements that may be in these areas, for example proposals for biodiversity net gain, as these may still have the potential for below ground archaeological impact.	The Applicant is currently in conversation with WNC, NNC and MKC about mitigation strategy, mainly preservation in situ and will continue detailed engagement. The mitigation strategy is secured in Schedule 2, Requirement 12 of the Draft DCO Revision A [EX1/GH3.1_A] . The Applicant notes HE's comments regarding other elements (i.e. BNG) potentially having an archaeological impact.
HE-013	Cultural Heritage	Draft Development Consent Order Requirement	Draft DCO As submitted the draft DCO requirement 12 reads as follows:- Archaeology 12.— (1) The authorised development must not be commenced until a programme of archaeological investigation has been carried out in accordance with the archaeological mitigation strategy. (2) No part of the authorised development may be commenced until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority or, where the part falls within the	The Applicant notes this comment. The Applicant notes that an iterative approach should be adopted. ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146] provides an overarching approach to the archaeological mitigation, which individual WSIs will be produced in line with. As detailed in Section 7.12 of the AMS the archaeological mitigation strategy will be under continuous review. If archaeological



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			administrative areas of multiple planning authorities, each of the relevant planning authorities. (3) The written scheme of investigation must be substantially in accordance with the archaeological mitigation strategy. (4) The written scheme of investigation must be implemented as approved. We have concerns with this wording as follows which we would wish to explore further: The use of 'substantively' as a modifier at 11(2) potentially introduces ambiguity and risk of dispute at post-DCO approval stage. Whilst the Draft requirement points to multiple WSI's (11-1) it appears (further to the proposed trenching strategy) that the 'parts' are intended to be spatial units rather than stages of an iterative investigation process. This sense is reinforced by the absence of a mechanism for the results of post-DCO evaluation to also inform mitigation alongside the Outline Written Scheme of Investigation (oWSI). In those cases where additional assessment stage trial trenching was to be undertaken post-DCO there needs to be a mechanism whereby the results of that work have a material bearing upon the subsequent phase of archaeological mitigation scheme(s). Mitigation methods should not ultimately be approved in terms of their accordance with the (pre-DCO) Outline WSI without taking into account also the results of post-DCO evaluation. Mechanisms	remains that require mitigation are identified beyond that detailed in the AMS, they will be appropriately mitigated inline with the mitigation options as outlined within the AMS, and secured in the detailed WSI(s). The term "substantially" is used to provide flexibility to adapt the detailed written scheme of investigation to properly account for the findings of the programme of archaeological investigation. Without this word, the use of "in accordance with" can be construed as meaning "exactly the same as". This is not appropriate for this requirement for the reasons identified by Historic England, namely that the findings of the further investigation carried out in accordance with the AMS will inform the mitigation applied to any newly identified archaeological assets within the final WSI.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to address this need have been secured by the SoS in the DCO's (as made) at Mallard Pass, West Burton and Cottam Solar.	



3.4 National Grid Electricity Transmission Plc

Table 3.4: [RR-1240](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NGET-001	Draft Development Consent Order	Protective Provisions	NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection and further discussion is required on the impact to its apparatus and rights.	The Applicant has included protective provisions for NGET in Part 3 of Schedule 15 to Draft DCO Revision A [EX1/GH3.1_A] . The Protective Provisions include a requirement for NGET's access to its apparatus to be maintained, including in any streets subject to restricted access under the DCO. The Applicant is engaging with NGET to agree the form of Protective Provisions. The Protective Provisions ensure that NGET's apparatus is appropriately protected.
NGET-002	General	Existing NGET infrastructure	Existing NGET infrastructure within/in close proximity to the proposed Order Limits: NGET owns or operates the following infrastructure within or in close proximity to the proposed Order Limits of Green Hill Solar Farm. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows: • Substations • Grendon 400 kV Substation	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			- Grendon 132 kV Substation - Associated overhead and underground apparatus including cables Overhead Lines - ZA 400kV OHL - Cottam - Grendon and Grendon- Staythorpe - ZA 400kV OHL - Grendon – Sundon 2 - Multiple section of minor lines 33kV and below	
NGET-003	General	Existing NGET infrastructure	Future NGET infrastructure within/in close proximity to the proposed Order Limits: The proposed Order Limits overlaps with land required for the Weston Marsh to East Leicestershire project (“WMEL Project”). This project is critical national infrastructure and involves the following works: - construction of a new 400,000 volt (400 kV) overhead line; - construction of two new substations; and - upgrading (reconductoring) approximately 55km of existing overhead line section 4ZA (OHL Works).	The Applicant has engaged with NGET to understand the extent of the interaction between the Scheme and the land required for the WMEL Project. The Applicant understands that NGET is proposing reconductoring works to existing overhead lines that intersect with the proposed Order Limits. The Applicant has requested further detail of the extents of the works proposed by NGET to better understand the relationship between the projects and is engaging with NGET to agree the form of Protective Provisions. If necessary, the Protective Provisions, or an associated side agreement, may include specific provisions relating to the proposed WMEL Project. The Applicant is confident that the limited nature of the works proposed by NGET, and that the Scheme has been



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				designed to accommodate the existing overhead lines, means the projects can readily coexist.
NGET-004	Draft Development Consent Order	Compulsory Acquisition in respect of NGET infrastructure	Compulsory Acquisition Powers in respect of NGET infrastructure: The Applicant is seeking compulsory powers over plot 13-173 which forms part of NGET's substation at Grendon. NGET objects to the compulsory acquisition of its assets, land or rights over its land in the absence of an agreed form of Protective Provisions. It is essential that nothing contained within the Order prevents NGET from continuing to deliver future plans or from accommodating other electricity connection customers.	The Applicant notes this comment and that NGET is content that appropriate Protective Provisions will address its concerns. The Applicant confirms it is engaging with NGET to agree the form of Protective Provisions.
NGET-005	Draft Development Consent Order	Compulsory Acquisition within the Book of Reference	NGET notes that the Book of Reference and Land Plans indicate that the Applicant is seeking permanent acquisition of rights and temporary possession over several land plots which contain NGET apparatus, are subject to rights held by NGET or over plots required for access to maintain their apparatus, including plots 08-94a, 08-094b, 08-096b, 08-096c, 10-99a, 10-99b, 10-101, 10-102, 10-103b, 10-103c, 10-104b, 10-107, 10-108, 11-109b, 11-111, 11-116c, 11-119a, 12-166 (Grendon Substation), 12-167, 13-169, 13-171b, 13-173, 13-176, 13-177b, 13-181, 13-182, 13-183, 13-184a, 13-184b, 14-186, 14-187b, 16, 212, 16-214, 17-215b, 17-216a, 17-217, 18-219, 18-220, 18-221, 18-223. There are also a significant	The Applicant has reviewed data supplied by NGET in terms of plots they have apparatus in and have corrected and verified this within the Book of Reference. The updated Book of Reference Revision B [EX1/GH4.3_B] will be submitted at Deadline 1. The Applicant notes NGET's requirements to protect the WMEL Project. Please refer to the response to reference 'NGET-003' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			number of incorrect references to NGET interests throughout the book of reference which relate to National Grid Electricity Distribution (NGED) assets or interests and NGET therefore requests that these are updated and NGED is consulted accordingly. In order to protect the WMEL project, the Applicant must ensure that: • no part of the ground mounted solar photovoltaic generating station or any associated works can be located in an area marked for WMEL construction; - and • no part of the grid connection cables or other infrastructure for the Project can be located in the area marked for the WMEL project. The Applicant must not be permitted to acquire or extinguish the rights of NGET in respect of land associated with existing or future NGET apparatus or interests.	
NGET-006	General	Status of NGET	Protection of NGET Assets: Given the above, NGET objects to the Green Hill Solar Park Project. As the design development process progresses, it is essential to ensure that no conflict arises with the proposed location of future NGET apparatus at the site, in recognition of the strategic importance of the WMEL project to the transmission of energy across the UK, as set out in the Clean Power 2030 report.	The Applicant notes this comment and is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme. Please refer to the response to reference 'NGET-003' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NGET-007	Draft Development Consent Order	Statutory Obligations	As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. As noted, NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew, repair and refurbishment such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.	The Applicant notes this comment. The Applicant has included protective provisions for NGET in Part 3 of Schedule 15 to the Draft DCO Revision A [EX1/GH3.1_A] , which includes protections for the removal of apparatus and access rights. The Applicant is engaging with NGET to agree the form of Protective Provisions.
NGET-008	Draft Development Consent Order	Protective Provisions	NGET will require protective provisions to be included within the draft Order which refer to existing and future infrastructure to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. The protective provisions that NGET will seek will align with those provisions granted under the Awel Y Môr Offshore Wind Farm DCO, the Byers Gill Solar DCO and the Mona Offshore Wind Farm DCO. NGET requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will	The Applicant notes NGET's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			ensure protection for those NGET assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	



3.5 National Highways

Table 3.5: [RR-1241](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-001	General	Summary of comments	This relevant representation is National Highways' ("NH") formal written response to the application by Green Hill Solar Farm Limited ("Applicant") for an order granting development consent for the Green Hill Solar Farm Project ("DCO"). The Applicant seeks development consent for proposed authorised development described in Schedule 1 of the draft DCO ("Authorised Development"). NH objects to the DCO and the Authorised Development for the following reasons: (a) The book of reference as submitted by the Applicant identifies 15 plots of land owned or occupied by NH for the purposes of its undertaking ("Plots") in respect of which compulsory acquisition powers are sought. The compulsory acquisition powers sought are described in the book of reference as Acquisition of Rights and Imposition of Restrictive Covenants and temporary possession ("Compulsory Powers"). To safeguard NH's interests and the safety and integrity of the Strategic Road Network ("SRN"), NH objects to the inclusion of the Plots in the DCO and to Compulsory Powers being granted in respect of them. The Plots constitute	The Applicant addresses these individual matters within the comments below. Please refer to the Applicant's response in 'NH-003', 'NH-008', 'NH-009, and 'NH-010'.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			land acquired by NH for the purpose of maintaining its statutory undertaking and, accordingly, this representation is made under section 56 and sections 127 and 138 of the Planning Act 2008. NH considers that there is no compelling case in the public interest for the Compulsory Powers over the Plots without the inclusion of NH's protective provisions and that the grant of the DCO without such provisions would result in serious detriment to the SRN. (b) The DCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions. These include articles 8,10,12,14,16,17,20, 24,25,27,30,31, 32,40 and 47. (c) NH requires additional information regarding the proposed works no 5A and 8A outlined in Schedule 1 to the draft order in relation to their impact on the strategic road network (SRN). The nature and scope of the proposed works affecting the SRN is currently unclear. Without the appropriate level of	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			information, it is not possible to effectively assess or manage the potential impact on the SRN. The inclusion of NH's protective provisions at appendix 1 are required to ensure the necessary information is provided at the relevant stages. NH is prepared to withdraw its objection subject to the Applicant agreeing to the inclusion of the NH protective provisions (in the form found at Appendix 1 of this document) on the DCO NH reserves the right to produce additional grounds of objection to the Examining Authority as the DCO progresses should NH consider it necessary if any further information relating to the impact on the SRN comes to light.	
NH-002	Transport and Access	National Highway's Role	NH (being the statutory successor to the Highways Agency) is an arms-length government owned company responsible for the ownership, management and improvement of England's motorways and major A-roads, collectively referred to as the strategic road network ("SRN"). The SRN comprises over 4,500 miles of road sitting at the core of the national transport system, connecting all major economic and resource centres with key markets and conurbations. The SRN is the most heavily used part of the national road network, carrying a third of all traffic and two-thirds of all freight totalling approximately 4 million	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			journeys a day. It provides businesses with the means to get products and services to their customers, gives access to labour markets and suppliers, and encourages trade and new investment. It is also a complex network of highway structures, drainage and attenuation apparatus and telemetry and electronic communication assets. In short, the SRN is a critical piece of economic infrastructure, vital to the nation's connectivity and the means for generating economic growth. NH is appointed pursuant to section 1 of the Infrastructure Act 2015 to act as the highway authority, traffic authority and street authority for the SRN. The effect of this appointment is to make NH the statutory custodian of this national asset, conferring on it the status and legislative functions of a strategic highways company. As a strategic highways company, NH must comply with a number of general and specific statutory duties¹, including to: (a) co-operate in so far as reasonably practicable with other persons exercising functions which relate to highways or planning; (b) have regard to the effect of the exercise of its functions on the environment;	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			(c) have regard to the effect of the exercise of its functions on the safety of users of highways. The Secretary of State for Transport may from time to time give a strategic highways company directions or guidance as to the manner in which it is to exercise its statutory duties and functions. For the purposes of directing the functions as regards the SRN, these directions are contained within the 2015 Licence.² The directions contained in the 2015 Licence are mandatory³ and are regulated by the Office of Road and Rail. They include: (a) Paragraph 4.1 - The network for which the Licence holder is responsible is a critical national asset, which the Licence holder must operate and manage in the public interest, in respect of both current activities and needs and in providing effective stewardship of its long-term operation and integrity; (b) Paragraph 4.2 – Without prejudice to the general duties on the Licence holder under section 5 of the Infrastructure Act 2015, the Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to:	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			i. ensure the effective operation of the network; ii. ensure the maintenance, resilience, renewal and replacement of the network; iii. ensure the improvement, enhancement and long-term development of the network; iv. ensure efficiency and value for money; v. protect and improve the safety of the network; vi. co-operate with other persons or organisations for the purposes of co-ordinating day-to-day operations and long term planning; vii. minimise the environmental impacts of operating, maintaining and improving its network and seek to protect and enhance the quality of the surrounding environment; viii. conform to the principles of sustainable development. Paragraph 5.37 – The Licence holder must hold and manage land and property in line with, and as a function of, the Licence holder's legal duties as a highway authority, and solely for the purposes of operating, managing and improving the highway,	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			unless otherwise approved by the Secretary of State for Transport More particularly sections 41 and 130 of the Highways Act 1980 contain respectively a statutory duty for NH to ensure it maintains the SRN to the appropriate/sufficient standard, free from any hazards so it is safe to use, and a statutory duty to assert and protect the rights of the public in use and enjoyment of the SRN. Section 16 of the Traffic Management Act 2004 contains a statutory Network Management Duty for NH to manage the SRN with a view to achieving, so far as may be reasonably practicable having regard to NH's other obligations, policies and objectives, securing the expeditious movement of traffic on the SRN and facilitating the same on roads where another authority is the traffic authority. In order to achieve this, the action NH may take in performing that duty includes that which NH considers will contribute to securing the more efficient use of the SRN or avoidance, elimination or reduction of disruption to the above relevant roads and may involve the exercise of any power to regulate or co-ordinate the uses made of any road (or part of a road) in the road network (whether or not the power was conferred on them in their capacity as a traffic authority). Section 17 of the Traffic Management Act 2004 requires that NH shall make such	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			arrangements as they consider appropriate for planning and carrying out the action to be taken in performing its Network Management Duty and has to establish processes to, as far as reasonably practicable, identify things (including future occurrences) which are causing, or have potential to cause SRN congestion or other disruption to the movement of traffic on it and consider any possible action that could be taken in response to (or anticipation of) anything so identified, e.g. in the event NH considers this particular statutory duty may not be met. Supplementary to this, 4.2 of NH's statutory licence requires NH to act in a manner which it considers best calculated to ensure the effective operation of the SRN. To comply with this, Paragraph 5.1 states that NH should seek to minimise disruption to road users that might reasonably be expected to occur as a result of planned or unplanned disruption to the network, as well as proactively and reactively provide relevant, accurate and timely information about traffic and conditions on the SRN to road users, including when there is disruption. This range of duties demonstrates that NH must always protect road users/the SRN and ensure the SRN retains its integrity, is free from hazard/safe to use and is available for continual uncongested use all year round subject to precise terms of its Network	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Management Duty which means NH is duty bound to consider carefully any activity that has the potential to impact on any of NH's statutory duties. Under section 5(2)(b) of the Infrastructure Act 2015, NH is under a duty to have regard to the safety of highway users. Safety is at the heart of NH's function as a statutory undertaker – the safety of the travelling public, the safety of NH staff and the safety of third party contractors on the network. The SRN is inherently a dangerous network to operate on, over and under – given the very limited control that NH has on road users operating at high speeds. The potential for catastrophic damage or injury from collision is prevalent – which is precisely why NH has strict procedures for contractors operating on, over or under the SRN, particularly those which it does not itself control.	
NH-003	Transport and Access	Strategic Road Network (SRN) Protective Provisions	Unlike other statutory consultees involved in the consenting of nationally significant infrastructure projects, NH is a very active promoter of development consent orders and understands keenly the pressures and requirements placed on applicants to balance the delivery of the scheme with the protections afforded to statutory consultees. NH has been at the vanguard of DCO-consented development since the Planning Act 2008 was introduced and has offered	The Applicant notes NH's comment and is engaging with it to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			many commitments for the protection of electricity and gas apparatus, water and drainage infrastructure, railway undertakings and other infrastructure owned by statutory consultees as a consequence of its own development consent orders. The SRN deserves the same measure of protection, proportionate to the extent of interference caused by the Authorised Development. NH understands the need for proportionality in the context of such protections and considers that a proportionate level of protection in all cases and as a minimum standard where there is the potential for impact to the SRN should be the following: (a) that NH be held harmless from the impact of third party development; (b) that NH procedures put in place for the protection of property and persons are adhered to in accordance with NH's strict requirements on network occupancy; (c) that any works carried out to the highway, on NH land, underneath the highway, above the highway and to apparatus forming part of the highway estate should be certified by NH and approved by NH on completion of the works;	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			(d) that financial provision should be put in place to ensure that in the event of the Applicant commencing works which may impact the SRN (including for example, underground works beneath the SRN or oversailing above it) and falling into financial difficulty or defaulting on completion of the works, NH has the resources needed to put the SRN and the highway estate into the position it was in before the Applicant commenced works; (e) that NH be indemnified for any loss or damage to the SRN or the highway estate as a result of the works; (f) that the Applicant requests approval from NH before exercising any powers under the DCO in relation to the SRN or the highway estate (such approval not to be unreasonably withheld) to enable proportionate rights and reservations to be secured for the protection of the SRN through private treaty; (g) that emergency procedures be agreed for NH to access the SRN to carry out works or remove dangerous obstacles resulting from the Authorised Development which pose a risk to life. These provisions are included in the NH protective provisions.	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-004	Transport and Access	Protective Provisions	NH considers that without the NH protective provisions, there is a considerable risk of serious detriment to the SRN, as any damage or injury to the SRN or wider highway estate would require funding to rectify that is not within NH's budget. There is no recourse to public funding for emergency works of this nature and a reserve of funding is not available. Without prejudice to whether the Authorised Development would cause a serious detriment to the SRN, it remains the case that the public purse should not be left to meet or subsidise costs of impacts caused by third party development to the SRN. Further, NH's estate comprises more than just the corpus of the highway (the 'top two spits'). Unlike local roads, where the local highway authority typically controls only the highway strata and sufficient vertical limits above and beneath the highway to maintain necessary apparatus and street furniture, in most cases NH controls the freehold of the land beneath the highway to the centre of the earth and to the heavens above. This estate is held for the benefit of the statutory undertaking, to ensure that the SRN is not compromised and that maintenance or improvement works at any required depth can take place free from risk of trespass or ransom. Where apparatus is co-located in the highway (which is commonplace), that apparatus has been authorised by NH or	The Applicant notes NH's comment and is engaging with it to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			has been installed through industry standard processes (such as under the New Roads and Street Works Act 1991), where statutory protection is afforded to NH as the highway or street authority. Whilst NH is prepared to grant a sub surface interest or right to co-locate apparatus in the highway, where it is geotechnically possible and respecting other apparatus that is in, on, under or over the highway – the interest must be proportionate and necessary and cannot be to the detriment of NH, the SRN or other undertakers. It cannot be acceptable that apparatus is placed in, on, under or over the SRN through a DCO by disapplying statutory protections that NH has and not accepting to acquiesce to the terms which are required by NH to manage its network in accordance with regulatory requirements. For the sake of clarity and transparency, NH has no desire to stymie development or to impose requirements on the Applicant which are disproportionate to the potential harm that could be caused to the SRN. NH is legally obliged to co-operate with third parties exercising planning or highway functions, which includes the Applicant in this statutory process.⁴ NH is prepared to engage fully and assist in whatever way is reasonable to ensure that the Authorised	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Development proceeds as quickly and efficiently as possible.	
NH-005	Transport and Access	Strategic Road Network and Protective Provisions	The authorised development is situated between the towns of Northampton and Wellingborough and shares boundaries with the A43, A45, A509 and A428, of which the A45 is part of the Strategic Road Network. We also note that Cable Corridor 2 (CC2)), which connects Green Hill E and Green Hill BESS (as referred to within the transport assessment (APP-151) runs adjacent to and under the A45. The Authorised Development includes Works no 5a and 8a in the DCO which will interface with the A45 Trunk Road and is therefore of interest to NH: Works No 5a - We welcome continued engagement from the Applicant to understand how the cable route will interact with National Highways' assets. In order to remove its objection, National Highways require details of the cable crossing marked HV_SP8562_002 on the Crossing Schedule (GH7.18) including: the cable alignment, duct diameter, capacity (whether more than 1 cable is to be provided for future capacity increased or redundancy/ contingency), confirmation on all parts of our SRN or land NH have an interest in that will be impacted by the proposed work. The soil management plan and construction traffic management plan appear too have	National Highway assets have been identified in the Crossing Schedule [APP-562]. This document sets out the likely construction method of how the assets and obstacles will be crossed (i.e. by way of open cut trench or trenchless techniques such as Horizontal Directional Drilling (HDD)). In respect of Work No. 5a where this crosses the A45, the Applicant confirms that this crossing will be made by a trenchless technique, e.g. HDD. Impacts on utility infrastructure will be mitigated through the measures set out in Table 3.18 in OCEMP Revision A [EX1/GH7.1_A]. This is secured through Schedule 2, Requirement 13 of the Draft DCO Revision A [EX1/GH3.1_A] which requires a detailed Construction Environmental Management Plan. The maximum parameters of the construction methods are set out in the CDPP Revision A [EX1/GH7.17_A] and these will need to be complied with at the detailed/construction stage. In addition, the Applicant is engaging with NH to agree a form of Protective Provisions, including the standards to be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			too high level information for us to understand how our SRN would be impacted. The details set out at paragraph 4.2 need to be agreed with National Highways in order for NH to remove its objection to the scheme. Any proposed directional drilling under our network will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). We advise the applicant to review the requirements of CD622, which can be found on the Standards for Highways website. NH will also need to approve the design information in relation to works No 5a to ensure NH's assets will not be compromised by the authorised works. Paragraph 7 of National Highways protective provisions at appendix 1 secures this approval and requirements set out within this paragraph.	complied with in relation to any HDD below the A45.
NH-006	Transport and Access	Strategic Road Network and Protective Provisions	Work No. 8A- We understand there is no direct access proposed from the SRN; however, the works to facilitate those access works at works no 8a will impact the SRN at specific locations due to a need to introduce temporary traffic management on the SRN. This includes access CR15 marked on the Access to Works Plan (APP-012), located south of the A45 on Grendon Road, and access points CR12 and CR13,	Physical works are not proposed in this area. As stated by National Highways, traffic management may be required for periods during the construction. The precise nature of those measures, together with their timing and duration is not known at this time but will be confirmed in the detailed Construction Traffic Management Plan which is set out in the OCTMP Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			also referenced on the Access to Works Plan (APP-012), located off the A45 eastbound slip road at B573 Earls Barton road. These relate to the access for the construction compound CC2 as described in the transport assessment. (APP-151). National Highways requires additional information from the applicant to confirm the scope and impact of the proposed works in this area. This includes any planned physical changes to the network, general arrangements, all traffic management layouts/arrangement, and road space booking proposals. All works effecting the SRN must be carried out in accordance with permanent design standards and designed to full compliant standard with Design Manual for Roads and Bridges, Manual of Contract Documents for Highway Works and Traffic Signs Regulations and General Directions to ensure the safety and integrity of the SRN. This needs to be reviewed and agreed with National Highways. The requirements for this information are set out within paragraph 7 of National Highways protective provisions at appendix 1.	[EX1/GH7.9_A] as secured in Schedule 2, Requirement 15 of the Draft DCO Revision A [EX1/GH3.1_A]. In addition, the Applicant is engaging with NH to agree a form of Protective Provisions, to manage the interaction of the Scheme with the SRN.
NH-007	Transport and Access	Compulsory Acquisition	The Applicant's draft DCO includes powers of temporary possession and the acquisition of rights in respect of the land interests owned by NH as set out in the table below referred to in the book of	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			reference. NH are carrying out checks internally to ascertain whether NH have any other interests impacted by the acquisition that are not mentioned in the book of reference and will update the Examining authority at the next deadline.	
NH-008	Transport and Access	Compulsory Acquisition	It is noted there are no proposals to permanently acquire the freehold interest of NH land. The proposal is to acquire rights over some of NH's plots. It is unclear whether the new rights can co-exist with the NH interests in the plots or whether NH's interests will be extinguished. NH require further understanding of how the acquired rights proposed by the Applicant will co exist with NH interests. If NH interests can co-exists with the rights proposed by the Applicant, NH can withdraw its concern in this regard however if NH interests are to be extinguished by the order NH would maintain its objection.	The Scheme interacts with NH's assets where the laying of the grid connection cable (Work No. 5A) crosses the A45. The cable will be laid using trenchless techniques, e.g. HDD. The other interaction with NH's assets is as set out above at reference NH-006. The Applicant is engaging with it to agree a form of Protective Provisions that will address the points raised in this comment.
NH-009	Transport and Access	Compulsory Acquisition	The Applicant is seeking to temporarily possess some plots of land that NH own the freehold interest to. The A45 crosses these plots. NH seeks clarity from the Applicant on the reasons temporary possession of this land is sought when article 10 of the DCO would provide the Applicant with the powers to carry out the highway works.	Temporary possession powers are sought to provide the Applicant with the necessary flexibility to undertake a range of activities associated with the construction, operation and maintenance of the Scheme. Please refer to reference 'NH-008' above for further information on the proposals. While Article 10 of the DCO provides the Applicant with powers to carry out the highway works, temporary possession powers are



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				included to manage any interference with any third-party interests, e.g. in the subsoil, or where the boundary of the highway may be unclear.
NH-010	Transport and Access	Book of Reference	The title of some of the plots of land in the table below (where this paragraph is referred to) are listed on the Land Registry in the name of National Highways Ltd. These plots are subsoil to parts of the highway network. The highway has been de-trunked pursuant to an order under section 10 of the Highways Act 1980 and is no longer part of the Strategic Road Network. By virtue of Section 265 of the Highways Act 1980, the de-trunking order has transferred ownership of the operational highway including the subsoil, to the Local Highway Authority (LHA). This means that ownership of these plots is vested in the LHA. The transfer of the registered proprietorship is an administrative exercise that is yet to be undertaken. Ownership, maintenance, and responsibility for the operation of these roads and land transferred to the LHA and the LHA should be consulted in relation to the possession of these plots. The book of reference should be updated at the next iteration to reflect the legal ownership.	The Applicant notes this comment and confirms that the Book of Reference Revision B [EX1/GH4.3_B] has been updated to reflect the local highway authority as legal owner of these plots.
NH-011	Transport and Access	Land and Rights	04-038 Our comments at paragraph 5.4 of this representation apply to this plot. Please see	The Applicant has been advised of the de-trunking which has impacted 5 plots in the order. The Applicant has updated



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			de-trunking order relevant to this plot at appendix 2 The A43 Trunk Road (M1 Junction 15A to A16 Stamford) (Detrunking) Order 2001.	the Book of Reference Revision B [EX1/GH4.3_B] to show the local highway authority as legal owner of these plots.
NH-012	Transport and Access	Land and Rights	04-039-b Our comments at paragraph 5.4 of this representation apply to this plot. Please see de-trunking order relevant to this plot at appendix 2 The A43 Trunk Road (M1 Junction 15A to A16 Stamford) (Detrunking) Order 2001.	The Applicant has been advised of the de-trunking which has impacted 5 plots in the order. The Applicant has updated the Book of Reference Revision B [EX1/GH4.3_B] to show the local highway authority as legal owner of these plots.
NH-013	Transport and Access	Land and Rights	04-039-b Our comments at paragraph 5.4 of this representation apply to this plot. Please see de-trunking order relevant to this plot at appendix 2 The A43 Trunk Road (M1 Junction 15A to A16 Stamford) (Detrunking) Order 2001.	The Applicant has been advised of the de-trunking which has impacted 5 plots in the order. The Applicant has updated the Book of Reference Revision B [EX1/GH4.3_B] to show the local highway authority as legal owner of these plots.
NH-014	Transport and Access	Land and Rights	04-041-b Our comments at paragraph 5.4 of this representation apply to this plot. Please see de-trunking order relevant to this plot at appendix 2 The A43 Trunk Road (M1 Junction 15A to A16 Stamford) (Detrunking) Order 2001.	The Applicant has been advised of the de-trunking which has impacted 5 plots in the order. The Applicant has updated the Book of Reference Revision B [EX1/GH4.3_B] to show the local highway authority as legal owner of these plots.
NH-015	Transport and Access	Land and Rights	05-054 This plot has a right granted over it for the benefit of the Secretary of State for Transport. We are making enquiries	The Applicant has reviewed the records for this interest further and has determined that it relates to land in the same title that is located to the south, outside of the Order Limits. In view of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			internally to ascertain whether the benefit of this right was transferred to NH when NH became the strategic highways company. We will update the Examining Authority and the Applicant at the next deadline.	this, the Applicant has removed this interest from the Book of Reference Revision B [EX1/GH4.3_B] . The Applicant would welcome confirmation from National Highways that it agrees with the Applicant's conclusions as to this interest.
NH-016	Transport and Access	Land and Rights	11-112 Please see our comments at paragraph 5.3 of this representation which apply to this plot. In addition, we understand Works no 8a effects this parcel of land which the A45 crosses. NH have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot.	Plot 11-112 is covered by Works number 8a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to facilitate temporary construction and decommissioning access to Works numbers 1 to 7 and 9 to 10 as set out in the CDPP Revision A [EX1/GH7.17_A] . The Applicant is not proposing any work to the road surface, removal of street furniture, or realignment of the highway. The plot is included should the need arise for temporary traffic management at this location.
NH-017	Transport and Access	Land and Rights	11-114 Please see our comments at paragraph 5.3 of this representation which apply to this plot. In addition, we understand Works no 8a effects this parcel of land which is subsoil to the A45. NH have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot. NH seeks clarity from the applicant on the	Plot 11-114 is covered by Works number 8a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to works required to facilitate temporary construction and decommissioning access to Works numbers 1 to 7 and 9 to 10 as set out in the CDPP Revision A [EX1/GH7.17_A] . The Applicant is not proposing any work to the road surface, removal of street furniture, or realignment of the highway. The plot is included should the need arise for



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			reasons temporary possession of this land is sought when article 10 of the DCO would provide the Applicant with the powers to carry out the highway works.	temporary traffic management at this location.
NH-018	Transport and Access	Land and Rights	11-116-c National Highways is the freehold owner of this plot that forms part of the subsoil to Doddington Road. North Northamptonshire Council are the highway authority for Doddington Road. As National Highways are not the highway authority for Doddington Road we do not have any comments in relation to the temporary possession of this plot.	The Applicant notes this comment.
NH-019	Transport and Access	Land and Rights	12-127 Please see our comments at paragraph 5.2 of this representation which apply to this plot. We understand Works no 5a effects this parcel of land which is subsoil to the A45. NH have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot. Please see our comments in connection with article 8 contained within the table at paragraph 4.3	Plot 12-127 is covered by Works number 5a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to works to lay electrical cables up to 400 kilovolts, accesses, and temporary construction laydown areas for the electrical cables as set out in the CDPP Revision A [EX1/GH7.17_A] . This plot has been included as part of the Cable Route Corridor where it crosses the A45. The Applicant confirms that Work No. 5a in this area will be laid using trenchless techniques such as HDD.
NH-020	Transport and Access	Land and Rights	12-128	Plot 12-128 is covered by Works number 5a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Please see our comments at paragraph 5.2 of this representation which apply to this plot. In addition, we understand Works no 5a effects this parcel of land which is subsoil to the A45. NH have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot. Please see our comments in connection with article 8 contained within the table at paragraph 4.3.	works to lay electrical cables up to 400 kilovolts, accesses, and temporary construction laydown areas for the electrical cables as set out in the CDPP Revision A [EX1/GH7.17_A] . This plot has been included as part of the Cable Route Corridor where it crosses the A45. The Applicant confirms that Work No. 5a in this area will be laid using trenchless techniques such as HDD.
NH-021	Transport and Access	Land and Rights	12-134 Please see our comments at paragraph 5.3 of this representation which apply to this plot. In addition, we understand Works no 8a effects this parcel of land which is subsoil to the A45. NH have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot.	Plot 12-134 is covered by Works number 8a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to facilitate temporary construction and decommissioning access to Works numbers 1 to 7 and 9 to 10 as set out in the CDPP Revision A [EX1/GH7.17_A] . The Applicant is not proposing any work to the road surface, removal of street furniture, or realignment of the highway. The plot is included should the need arise for temporary traffic management at this location.
NH-022	Transport and Access	Land and Rights	12-135 Please see our comments at paragraph 5.3 of this representation which apply to this plot. In addition, we understand Works no 8a effects this parcel of land which is subsoil to the A45. NH have been provided	Plot 12-135 is covered by Works number 8a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to facilitate temporary construction and decommissioning access to Works numbers 1 to 7 and 9 to 10 as set out in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot.	the CDPP Revision A [EX1/GH7.17_A] . The Applicant is not proposing any work to the road surface, removal of street furniture, or realignment of the highway. The plot is included should the need arise for temporary traffic management at this location.
NH-023	Transport and Access	Land and Rights	12-149 Please see our comments at paragraph 5.3 of this representation which apply to this plot. In addition, we understand Works no 8a effects this parcel of land which is subsoil to the A45. NH have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot.	Plot 12-149 is covered by Works number 8a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to facilitate temporary construction and decommissioning access to Works numbers 1 to 7 and 9 to 10 as set out in the CDPP Revision A [EX1/GH7.17_A] . The Applicant is not proposing any work to the road surface, removal of street furniture, or realignment of the highway. The plot is included should the need arise for temporary traffic management at this location.
NH-024	Transport and Access	Land and Rights	12-150 Please see our comments at paragraph 5.3 of this representation which apply to this plot. In addition, we understand Works no 8a effects this parcel of land which is subsoil to the A45. NH have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. NH require additional information about the works proposed in order to remove its objection for this plot.	Plot 12-150 is covered by Works number 8a in the Works Plan Revision B [EX1/GH2.4_B] . This work relates to facilitate temporary construction and decommissioning access to Works numbers 1 to 7 and 9 to 10 as set out in the CDPP Revision A [EX1/GH7.17_A] . The Applicant is not proposing any work to the road surface, removal of street furniture, or realignment of the highway. The plot is included should the need



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				arise for temporary traffic management at this location.
NH-025	Transport and Access	Land and Rights	18-223 Our comments at paragraph 5.4 of this representation apply to this plot.	The Applicant has been advised of the de-trunking which has impacted 5 plots in the order. The Applicant has updated the Book of Reference Revision B [EX1/GH4.3_B] to show the local highway authority as legal owner of these plots.
NH-026	Transport and Access	Draft DCO Protective Provisions	Whilst the protective provisions included in the Applicant's draft DCO for NH's benefit, include some protections for NH, concerns do remain in relation to some of the articles. The form of protective provisions at Appendix 1 addresses those concerns. The Applicant's draft DCO includes the following provisions which are of specific concern to NH: Article 8 This article gives the applicant the power to break open the streets, place and keep apparatus in or under the street etc to those streets referred to at Schedule 4. Schedule 4 includes the A45 which forms part of the strategic network that NH is responsible for at the following locations marked on the Streets Plan (APP-010): • Points 11c and 11d • Points 12o and 12n	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Points 12i and 12m • Points 12e and 12f • Points 12g and 12g This article will give the applicant the power to break open the streets, place and keep apparatus etc. beneath the A45. To date, no information has been received by NH other than the location of the apparatus, so the nature and scope of the proposed works remains unclear. Please refer to paragraph 4.2 for the information NH require in order to address NH's concern relating to this article. Additionally, please note it is NH's preference that any apparatus installed under the strategic road network is carried out by Horizontal Directional Drilling (HDD) rather than an open cut method. It is noted that the Applicant's protective provisions for the benefit of NH to the draft order requires NH's approval to the design before works under this article commence at paragraph 60(2) however this does not extend to approval of the programme for the cable works. As the highway authority for the A45 NH must have control over the operations being carried out on and under its network in order to comply with its duty to co-ordinate the execution of works of all kinds (including works for road purposes) under section 59 of the New Roads and Street Act	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			1991. Road space booking will be required in connection with these works so NH can comply with this duty. This is critical from a safety perspective and to protect the structure of the street and the integrity of apparatus in it. Therefore, the applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH-027	Transport and Access	Draft DCO Protective Provisions	Article 10 The applicant has the power to temporarily alter the layout and carry out works to the streets specified in column 2 of the table in Part 2 of Schedule 5. The A45 referred to in schedule 5, forms part of the strategic road network that National Highways are the highway authority for. To address NH's concern relating to this article NH requires additional information as stated in	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. Additionally, the powers are subject to compliance with the Requirements in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Construction Traffic Management Plan (CTMP) needs



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			paragraphs 4,4 and 4,5 above regarding the works listed in Part 2, Schedule 5 specifically for the following points on the Streets Plan (APP- 010): • Points 11c and 11d • Points 12i and 12m • Points 12n and 12o The nature and scope of the proposed works remain unclear. In addition, it is noted the draft order provides the Applicant must obtain NH's prior approval for works undertaken under this article in connection with the SRN at paragraph 60 of NH's protective provisions of the applicant's draft DCO. However, such consent should not be subject to deemed consent under article 47. Please see comments in this regard below	to be approved and will include detailed design of any highways works. Requirement 15 requires the relevant planning authority to consult with the relevant highway authority before approving the detailed CTMP, which would include NH in respect of the SRN. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.
NH-028	Transport and Access	Draft DCO Protective Provisions	Article 12 This article provides the applicant with powers equivalent to a temporary traffic regulation order in connection with any road. It is noted that consent is required from the street authority before exercising those powers however such consent should not be subject to deemed consent under article 47. Please see comments in this regard below. In addition, at sub paragraph 3 the applicant has the power to temporarily close, prohibit the use of, restrict the use of,	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. Additionally, the powers are subject to compliance with the Requirements in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Construction Traffic Management Plan (CTMP) needs to be approved and will include detailed design of any highways works.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			alter or divert those streets specified in column 2 of the table at schedule 6. The A45, forms part of the SRN referred to at schedule 6. NH requires further information regarding the proposed works listed in Part 1 schedule 6, 'Streets to be Temporarily Closed,' as the nature and scope remains unclear, specifically for the following locations on the streets plan (APP-010): • 24m section of Nene Valley Way (A45) between points 11c and 11d • 19m section of Nene Valley Way (A45) between points 12l and 12m • 20m section of Nene Valley Way (A45) between points 12o and 12n. The applicant is required to consult with NH in this regard but they do not require our consent. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1.	Requirement 15 requires the relevant planning authority to consult with the relevant highway authority before approving the detailed CTMP, which would include NH in respect of the SRN. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Inclusion of paragraph 7(2) of NH's proposed protective provisions would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	
NH-029	Transport and Access	Draft DCO Protective Provisions	Article 14 This article provides the applicant with powers to carry out works to form and lay out such means of access or to improve existing means of access at any location within the order limits. National Highways network, forms part of that order limit. Whilst approval is required from the relevant planning authority with consultation of the highway authority for such an access, approval of the highway authority is not required. NH must have control over the operations being carried out on its network and accesses from its high speed network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event an access is required to the SRN. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1.	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. Additionally, the powers are subject to compliance with the Requirements in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Construction Traffic Management Plan (CTMP) needs to be approved and will include detailed design of any highways works. Requirement 15 requires the relevant planning authority to consult with the relevant highway authority before approving the detailed CTMP, which would include NH in respect of the SRN. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Inclusion of paragraph 7(2) of NH's proposed protective provisions would address National Highways objection to this article, which requires the applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below. If deemed consent provisions were to apply NH would have no control over when the local planning authority respond. This highlights the importance of the consent also being required from NH as highway authority if deemed consent provisions were to apply so NH has control over when the consent is provided.	
NH-030	Transport and Access	Draft DCO Protective Provisions	Article 16 This article provides the applicant with powers equivalent to a temporary traffic regulation order in connection with any road. It is noted consent is required from the traffic authority before exercising those powers however such consent should not be subject to deemed consent under article 47. Please see comments in this regard below. In addition, at sub paragraph 2 the Applicant has the power to temporarily place traffic signs and signals on those roads specified in column 2 of the table at	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. Additionally, the powers are subject to compliance with the Requirements in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Construction Traffic Management Plan (CTMP) needs to be approved and will include detailed design of any highways works. Requirement 15 requires the relevant planning authority to consult with the relevant highway authority before



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			schedule 8 which are deemed to have been permitted by the traffic authority for the purposes of section 65 of the 1984 Act and the Traffic Signs Regulations and General Directions (2016). The A45, forms part of the SRN referred to at schedule 8. NH requires further information regarding the proposed works listed in the schedule at the following points on the Streets Plan (APP- 010) as the nature and scope of the proposed works remains unclear: • 11c and 11d • 12e and 12f • 12g and 12h • 12n and 12o • 12i and 12m The draft order allows the applicant to exercise their powers at article 16(2) without the consent of NH and provides the applicant with deemed approval under section 65 1984 Act. NH must have control over the placing of signage on its network. This is critical from a safety perspective and to maintain the integrity of the asset. NH will require details of any proposed signage and must review and approve the proposed signage. Full details, including the dimensions of the signs, must be submitted for approval. All signage must be designed in accordance with the Department for	approving the detailed CTMP, which would include NH in respect of the SRN. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Transport's requirements, as outlined in the Traffic Signs Manual Chapter 8, and must also comply with the Design Manual for Roads and Bridges (DMRB). The Applicant should be required to obtain NH's consent for any signage on the SRN to ensure these standards are met and to protect the safety of the road users. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article in relation to signage being permitted under section 65 of the 1984. This requires the Applicant to obtain NH's consent before exercising their right under this article. In addition, NH seek clarity from the application on the reasons wording is sought that any signage would be deemed to comply with the Traffic Signs Regulations and General Directions 2016. This is a set of directions that governs the design of signage which all signage on the SRN should comply with.	
NH-031	Transport and Access	Draft DCO Protective Provisions	Article 17 This article allows the applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development. It is unclear	The Applicant notes National Highways' comments. As confirmed in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A], surface water from the Scheme will be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			whether or not this article applies to NH's drainage system as drafted or whether this applies to public drains only. NH's drainage system is not a public drain. Please can the Applicant confirm if the intention is for this article to apply to NH's drains. If it is the intention for this article to apply to NH drains, NH do have concerns in this regard. It is noted consent is required from the person to whom the watercourse, drain or sewer belongs however such consent is subject to deemed consent under article 47. Please see comments in this regard below. NH is concerned this provision potentially allows the applicant to make use of highway drainage infrastructure for the benefit of their authorised development. Paragraph 59 of the Dft Circular 01/2022 which contacts government guidelines National Highways are required to comply with, sets out the following: 59. To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a	managed within site boundaries through sustainable drainage systems, discharging to local watercourses at controlled greenfield rates. No reliance is placed on National Highways' drainage infrastructure for the operational strategy, and no new connections are proposed into highway drainage systems. Any interaction with third-party drainage assets, including those of National Highways, would require agreement with the relevant asset owner. The Applicant confirms that the Scheme design does not anticipate discharge to National Highways' drainage network.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity. These provisions require consent to be obtained from the relevant highway authority before water can be discharged into the highway drainage system. As such, measures should be put in place so that such consent or refusal can be provided. Inclusion of paragraph 7(2) of NH's proposed protective provisions at appendix 1 would address National Highways objection to this article, which requires the applicant to obtain National Highways consent before exercising their right under this article. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions.	
NH-032	Transport and Access	Draft DCO Protective Provisions	Article 19 This article provides the Applicant with the power to carry out protective works to any building within the order limits. Whilst NH does not have any buildings within the order limits, it does have concern in relation to sub-paragraph 4 of this article, which provides the Applicant with the power to enter land which is adjacent to the building to carry out the protective works.	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The said land may form part of the SRN or land NH has an interest in. The article does not require the Applicant to obtain consent from the landowner but merely obtain their consent. NH must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH's consent in the event any access or works under this article effect the SRN or any land National Highways has an interest in. NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address National Highways objection to this article, which requires the applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-033	Transport and Access	Draft DCO Protective Provisions	Article 20 This article allows the applicant to enter any land within the order limits effected by the authorised development or enter on any land upon which entry is required in order to carry out monitor or survey in respect of the authorised development and , carry out surveys or investigations, trial holes, bore holes, ecological or archaeological investigations and place leave or remove apparatus on land in this regard. Whilst it is noted consent is required from the highway authority at sub paragraph 4 for any trial holes, bore holes and trenches for land located within the highway boundary, consent is not required for the wider use of the powers granted within this article such as access to land for surveys etc. Consent is also not required for any land NH own that is outside of the highway boundary and the applicant is only required to serve notice on the landowner prior to exercising this right. This is also a right that extends beyond the order limits. NH must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event any access or works under this article effect the SRN or any land	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			National Highways has an interest in. NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address National Highways objection to this article, which requires the applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH-034	Transport and Access	Draft DCO Protective Provisions	Article 24 As referred to at paragraphs 4.2 and 4.3 above NH requires further information in relation to the apparatus being installed for which the rights are being acquired over the SRN and land NH has an interest in. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities effect the strategic road network	The Applicant notes NH's comment. Please refer to the response to reference NH-008 above for further information about the interaction of the Scheme with NH's assets. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH-035	Transport and Access	Draft DCO Book of Reference Protective Provisions	Article 25 We note the book of reference does not include any NH interests over plots where the freehold interest is being acquired however, we are carrying out checks internally to ensure there are no other interests not mentioned within the book of reference that would cause NH concern with this article. We will update the Examining Authority at the next deadline.	The Applicant acknowledges this comment and awaits further update at the next examination deadline.
NH-036	Transport and Access	Draft DCO Protective Provisions	Article 27 It seems this article permits the Applicant to interfere with any right or interest NH may have within the order limits. This raises a concern however it is not clear whether there will be a temporary interference or permanent extinguishment of NH's	Article 27 provides that, where activity that is authorised by the DCO interferes with an existing easement or right, it continues to be authorised notwithstanding that interference. It does not provide any power to interfere with existing rights, but instead provides for



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			interests. Please can the Applicant confirm how this is going to apply relating to NH's interests	compensation to be payable in relation to activities carried out under the powers granted in other Articles, where the activity results in a breach of an existing easement or right. The effect of Article 27 is to protect the authorised activity from other remedies that may otherwise be sought, such as an injunction, which would interfere with the delivery of the Scheme. In the case of NH, the protective provisions included within the Draft DCO Revision A [EX1/GH3.1_A] provide for NH to approve plans for works affecting the strategic road network. In the event the works approved interfere with any existing rights held by NH, that interference will have been known to NH as part of the plan approval process within the protective provisions. The Applicant confirms that it is engaging with NH to agree a form of Protective Provisions.
NH-037	Transport and Access	Draft DCO Protective Provisions	Article 30 This article provides the applicant with the power to enter and use the subsoil or airspace over any part of NH's network within the order limits without NH's consent. NH would not permit uncontrolled oversailing or works underneath its network which would originally have the protection	The Applicant notes NH's comment and is engaging with it to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			of a section 50 pursuant to the New Roads and Street Works Act 1991. NH would need to give consideration to the safety implications of such work and its interface with NH's assets. NH would expect to have an approval role. NH must have control over the operations being carried out under and over network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address National Highways objection to this article, which requires the applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH-038	Transport and Access	Draft DCO	Article 31	The Applicant notes NH's comment. Please refer to the response to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
		Protective Provisions	This article provides the applicant with the power to take temporary possessions of the land referred to in schedule 11 and any other order land without the consent of NH. Schedule 11 includes land plots 11-112, 11-114, 12-134, 12-135, 12-149 and 12-150 on lands plan (APP-007) that NH is the registered owner of. As set out in paragraph 5.3 above, NH seeks clarity from the Applicant on the reasons temporary possession of this land is sought when article 10 of the DCO would provide the Applicant with the powers to carry out the highway works. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address National Highways objection to this	reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			article, which requires the applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH-039	Transport and Access	Draft DCO Protective Provisions	Article 32 This article grants the applicant with the right to take temporary possession of any land within the order limits without the consent of NH, during the maintenance period (period of five years beginning with the date of final commissioning of the part of the authorised development). NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address National Highways objection to this	The Applicant notes NH's comment. Please refer to the response to reference 'NH-008' above for further information about the interaction of the Scheme with NH's assets. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			article, which requires the applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH-040	Transport and Access	Draft DCO Protective Provisions	Article 40 This article provides the Applicant with the power to fell or lop any tree or shrub near any part of the authorised development. NH are making checks internally to ascertain whether NH have any environment mitigation commitments that may be affected by the authorised development to ascertain whether this article may put NH in breach of its own statutory obligations.	The Applicant notes NH's comment. As set out above at reference NH-008, there is very limited interaction with NH's assets above ground. The Applicant does not anticipate any works that would be capable of affecting any environmental mitigation commitments made by NH, and looks forward to this being confirmed by NH in due course.
NH-041	Transport and Access	Draft DCO Protective Provisions	Article 47 Sub- paragraph 4 of article 47 includes deemed approval which is granted where NH does not provide its consent or approval to any provisions under the order within 6 weeks of it being requested where no response is received. 6 weeks is not considered a reasonable period of time to consider every application that may come through under this DCO, some may be more involved than others. 8 weeks would be considered reasonable.	The Applicant notes NH's comment. Article 47(4) provides that the 6 week timeframe and deemed approval applies save for applications made pursuant to Schedule 16. Protective Provisions for NH have been provided within Schedule 16, and these will take precedent over Article 47 in respect of both timescales and whether any approval may be deemed. The Applicant notes that NH is content that appropriate Protective Provisions will address its concerns and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			In any event, NH is concerned with the deemed consent given the safety implications of works being carried out to or under the strategic road network that may have bypassed its approval processes. This is a fundamental issue of public safety that should not be compromised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision. Inclusion of paragraph 7(7) of National Highways proposed protective provisions at appendix 1 would address National Highways concerns which would seek to disapply article 47 in the context of any consent relating to the strategic road network. The effect of this is to prevent the Promoter from exercising powers over the SRN or land in which NH has an interest without deemed consent applying. The justification is to ensure open dialogue between the parties so that National Highways has control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. As a public body, National Highways is under a	confirms that it is engaging with NH to agree a form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			duty to act reasonably and this is expressly provided in paragraph 7(4) of NH's protective provisions.	
NH-042	Transport and Access	Draft DCO Requirements	NH should be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN. Inclusion of drafting in red would address NH's concern. Requirement 3 (1) The undertaker may submit any amendments to any approved document to the relevant planning authority for approval in consultation with National Highways and, following approval, the relevant approved document is to be taken to include the amendments approved under this paragraph.	The Applicant does not consider that it would be appropriate for the relevant planning authority to be required to consult NH on every amendment to an approved document, given that not every amendment will be relevant to NH. In addition, NH has not raised any concerns about impacts to the SRN from matters, such as construction traffic, that are controlled by the approved documents. As noted above at reference NH-008, there is only limited interaction between the Scheme and the SRN, and it is clear from NH's representations that its concerns can be adequately addressed through Protective Provisions. The Applicant is engaging with NH to agree the form of Protective Provisions.
NH-043	Transport and Access	Draft DCO Requirements	Requirement 7 (1) No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority in consultation with National Highways for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant	Please refer to the response to 'NH-042'. The Applicant does not consider it appropriate for NH to be a mandatory consultee on this Requirement, and is engaging with NH to address its concerns through an agreed form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			planning authorities in consultation with Natural England. NH should be given an opportunity to review the landscape and ecological management plan in the interest of the safe and efficient operation of the SRN and to protect the soft estate of the SRN from potential ecological or landscape-related impacts. Inclusion of drafting in red would address NH's concern.	
NH-044	Transport and Access	Draft DCO Requirements	Requirement 8 (1) No part of the authorised development may commence until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority in consultation with National Highways for that part or, where the phase falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities in consultation with Natural England. NH should be given an opportunity to review the ecological protection and mitigation strategy to ensure appropriate ecological safeguards are implemented and maintained, with consideration of potential impacts on the SRN. Inclusion of drafting in red would address NH's concern.	Please refer to the response to 'NH-042'. The Applicant does not consider it appropriate for NH to be a mandatory consultee on this Requirement, and is engaging with NH to address its concerns through an agreed form of Protective Provisions.
NH-045	Transport and Access	Draft DCO Requirements	Requirement 10 (1) No part of the authorised development may commence until written details of all proposed	Please refer to the response to 'NH-042'. The Applicant does not consider it appropriate for NH to be a mandatory



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			temporary fences, walls or other means of enclosure, including those set out in the construction environmental management plan, for that part have been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities. (2) No part of the authorised development may commence until written details of all permanent fences, walls or other means of enclosure for that part have been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities. NH should be given the opportunity to review the details of any proposed fences, walls or enclosures if within the vicinity of the SRN for reasons of safety, liability, and maintenance and to ensure compliance paragraph 57 of DfT Circular 01/2022 which sets out any structures “must be located outside of the highway boundary of the SRN. In general terms, structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot	consultee on this Requirement, and is engaging with NH to address its concerns through an agreed form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			topple on to the SRN or undermine its geotechnical integrity" Inclusion of drafting in red would address NH's concern.	
NH-046	Transport and Access	Draft DCO Requirements	Requirement 11 No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority in consultation with National Highways . NH should be given the opportunity to review the details of the surface water and foul water drainage system to ensure the integrity of the SRN drainage infrastructure is not interfered with and that any plans are in accordance with DfT Circular 01/2022. Please see NH comments at article 17 above. Particular attention must be given where the drainage is adjacent to the SRN or National Highways land, as changes in water management could directly affect the SRN asset. No surface water run-off from the development shall be discharged into the SRN drainage systems. No new drainage connections from third-party developments will be permitted Inclusion of drafting in red would address NH's concern.	Please refer to the response to 'NH-042'. The Applicant does not consider it appropriate for NH to be a mandatory consultee on this Requirement, and is engaging with NH to address its concerns through an agreed form of Protective Provisions.
NH-047	Transport and Access	Draft DCO	Requirement 12 (2) No part of the authorised development may be	Please refer to the response to 'NH-042'. The Applicant does not consider it



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
		Requirements	commenced until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple planning authorities, each of the relevant planning authorities. NH should be given the opportunity to review the details of the archaeological assessment to ensure appropriate archaeological assessment and mitigation, so NH may share knowledge where its own development may have previously impacted unidentified assets Inclusion of drafting in red would address NH's concern.	appropriate for NH to be a mandatory consultee on this Requirement, and is engaging with NH to address its concerns through an agreed form of Protective Provisions.
NH-048	Transport and Access	Draft DCO Requirements	Requirement 13 No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities. NH should be given the opportunity to review the details of the construction environment management plan to ensure mitigation of environmental impacts during the construction phase and to ensure the SRN is not adversely affected by noise,	The Applicant notes this comment and is engaging with NH to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			dust, or other construction related issues. Inclusion of drafting in red would address NH's concern.	
NH-049	Transport and Access	Draft DCO Requirements	Requirement 14 (1) Prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part must be submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities. NH should be given the opportunity to review the details of the operational environment management plan to ensure the management of long-term environmental risks associated with the site and ensure ongoing protection of the SRN. Inclusion of drafting in red would address NH's concern.	The Applicant notes this comment and is engaging with NH to agree the form of Protective Provisions.
NH-050	Transport and Access	Draft DCO Requirements	Requirement 15 (1) No part of the authorised development may commence until a construction traffic management plan for that part must be submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning	The Applicant refers NH to sub-paragraph (3) of Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] . Before the detailed construction traffic management plan is approved by the relevant planning authority, they must consult with the relevant highway authority. Accordingly, NH will be consulted in respect of the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			authorities, each of the relevant planning authorities. NH should be given the opportunity to review the details of the construction management plan to manage the construction traffic and vehicle movements safely and efficiently, minimising disruption and potential hazards to the SRN. Inclusion of drafting in red would address NH's concern.	detailed CTMP where the provisions affect the SRN.
NH-051	Transport and Access	Draft DCO Requirements	Requirement 16 (1) Prior to the date of final commissioning of the authorised development, an operational traffic management plan must be submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities. NH should be given the opportunity to review the details of the operational traffic management plan to ensure that traffic generated during the operation of the development does not adversely affect the safety or capacity of the SRN. Inclusion of drafting in red would address NH's concern.	The Applicant notes this comment and is engaging with NH to agree the form of Protective Provisions.
NH-052	Transport and Access	Draft DCO Requirements	Requirement 21 (6) No decommissioning works must be carried out until the relevant planning authority has approved the decommissioning plan submitted in relation	The Applicant notes this comment and is engaging with NH to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to those works, in consultation with the Environment Agency and National Highways. NH should be given the opportunity to review the details of the decommissioning plan. This should include a transport assessment and construction environmental impacts to ensure that the decommissioning process will not adversely affect the SRN. This is particularly important where restoration to previous site use is proposed. Inclusion of drafting in red would address NH's concern.	
NH-053	Transport and Access	Construction	The Authorised Development will also interface with the Strategic Road Network in the following way: A) Traffic and Transport – Construction Phase National Highways have reviewed Chapter 13 – Transport and Access of the Environmental Statement (APP-050), including the associated Transport Assessment provided by the Applicant. NH offers the following comments which have also been shared with the Applicant: I) The consultant has considered relevant development policies, including the National Planning Policy Framework and Strategic Road Network guidance, in the preparation of the Transport Assessment. However, NH note that 2029 has been used as the forecast year for cumulative	The future year has been selected such that the greatest volume of traffic associated with cumulative schemes can be assessed. The assessment of construction traffic assumes the peak number of HGV movements and worker numbers across the Scheme, applying this to the future year to provides an assessment which considers the highest traffic volumes. The assessment has not assumed the delivery of wider highway works associated with other developments.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			impact assessment. NH requires clarification on this selection, as peak construction activity may occur earlier and some assumed highway improvements may not be in place at that time. II) NH note that the construction of the scheme is anticipated to commence in 2027 and be completed by 2029. The construction phase is expected to generate the highest level of traffic associated with the development. Please can the Applicant provide further clarification regarding the use and justification of proxy site data, the construction traffic generation, and trip distribution at key SRN junctions (A14 Junction 2 (A14 – A508 Junction), A14 Junction 8 (A14 – A43 Junction), A14 Junction 9 (A14 – A509 Junction), A45 Junction 14 (A45 – A509 Junction), A45 Junction 10 (A45 – B573 – Station Road Junction) and A45 Barnes Meadow Interchange.	
NH-054	Transport and Access	Strategic Road Network Operational	Once operational, the scheme will generate minimal traffic, with fewer than one maintenance visit per day per site, typically undertaken by light vans or 4x4 vehicles set out in Chapter 13 – Transport and Access of the Environmental Statement (APP 050). This level of activity is not expected to result in any material impact on the SRN.	The Applicant notes this comment and agrees.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-055	Transport and Access	Strategic Road Network Decommissioning Phase	NH note from Chapter 13 – Transport and Access of the Environmental Statement (APP-050) that vehicle movements associated with the decommissioning phase are not expected to exceed those generated during the construction period.	The Applicant notes this comment and agrees.
NH-056	Transport and Access	Abnormal Loads	NH understand the project will require abnormal loads for specific equipment and materials (elements such as transformers) to the site on the SRN. NH encourages the Applicant to engage with NH early in the process to establish an effective movement strategy. Please note that a Special Orders will be required for loads exceeding 150 tonnes pursuant to section 44 of the Road Traffic Act 1988. This falls outside of the DCO process. The Applicant has contacted NH through their transport consultant, Wynns Ltd. A feasibility study has been completed assessing the suitability of the network for the proposed route of the abnormal load from the Port of Tilbury to the BESS site at Grendon for 183-tonne loads. The Applicant has been advised that feasibility studies are high-level assessments designed to determine whether the network is structurally capable, at this stage, of accommodating the proposed heavy loads. The applicant must submit a formal applications closer to the actual movement date once a haulier has	ES Appendix 13.2 Transport Assessment [APP-151 to APP-153] includes an assessment of abnormal loads which as NH note include liaison with NH over specific routes. The requirement to submit a formal applications closer to the actual movement date once a haulier has been appointed is noted and agreed.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			been appointed. At that time, route suitability will be re-checked with all relevant structure and road owners, and a Special Order permit for the movement will be issued.	
NH-057	Transport and Access	Statement of Common Ground	To date, NH has not entered discussions with the Applicant, and no matters have been discussed or agreed upon concerning the Statement of Common Ground.	The Applicant is progressing the National Highways Statement of Common Ground [EX2/GH8.3.7] and is engaging with NH to agree the form of protective provisions to be included in the Draft DCO Revision A [EX1/GH3.1_A] .
NH-058	Transport and Access	Draft DCO Protective Provisions	As protective provisions have not been agreed with the Applicant to date, NH includes as part of its relevant representation, a submission detailing the precise need for the protections which are requested in the form of the protective provisions appended at Appendix 1. 8. In order to facilitate the withdrawal of NH's objection to the DCO and Authorised Development, NH requests that the Applicant includes the NH protective provisions at Appendix 1 to the draft Order at the next deadline. NH will continue to discuss the protective provisions with the Applicant in an effort to reach agreement and will update the Examining Authority at a later deadline. A full justification for each of the key provisions and definitions of National	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Highways protective provisions is set out below: Paragraph 1- Application This provision has effect to preserve the statutory powers and duties of NH except where expressly amended by the Order.	
NH-059	Transport and Access	Draft DCO Protective Provisions	Paragraph 2 – Interpretation Key provisions: “as built information” – contains the relevant information required by NH in order to issue the provisional certificate, certifying that works in, on under or over the SRN are satisfactorily complete and safe from NH’s perspective. “bond sum” – this provides that a bond sum required is 200% of the cost of the specified works in, on under or over the SRN. The bond required is not the total cost of the works but rather the section of works specifically impacting the SRN. Much in the same way as a section 278 agreement, bonding is required to protect NH from financial liability in the event that the Applicant defaulted on the works which impact the SRN. “commuted sum” – provision of financial security to NH for any assets which require ongoing maintenance. Where the authorised development includes works which will require ongoing maintenance, this should be funded by the Applicant and not become a burden on the public purse. “detailed design information” –	The Applicant notes NH’s comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			contains the relevant information required by NH in order to approve the commencement of the specified works affecting the SRN. In the experience of NH's highway engineers, this definition includes all necessary drawings, specifications and calculations required for signing off works in, on, under or over the SRN but may need to be supplemented depending on the nature of the project. "Road space booking" – NH has a strict procedure for managing network occupancy to ensure that they are aware of who is working on the SRN at any given point. It also ensures that sections of the SRN are not subject to conflicting or multiple sets of maintenance work. "Specified works" – any work authorised by the order (including maintenance) which is on, in, under or over the strategic road network. Importantly, this covers the highway estate as well as the operational highway land to ensure that works beneath the highway or above it are subject to the same requirements as work to the highway stratum itself. Critically, works which occur under or over the SRN can still have a detrimental operational impact to the functioning of the undertaking and can result in significant safety impacts. "Strategic road network" includes all operational land of NH within the order	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			limits and also the highway estate itself to protect the safe functioning of the SRN.	
NH-060	Transport and Access	Draft DCO Protective Provisions	Paragraph 3 – General Parts of the SRN are routinely managed by design build finance and operate contractors, who have primary responsibility for managing the asset. The purpose of these provisions is to ensure that, where the road subject to the specified works is managed under a DBFO contract, the highway operations and maintenance contractor can take the benefit of the protective provisions. Otherwise, any claim that the highway operations and maintenance contractor had against the Applicant by virtue of its stewardship of the asset would need to be through a claim made by National Highways and sub-recovered by the DBFO contractor. This is unnecessary, inefficient and creates a contractual risk to National Highways, as the DBFO contract does not cater for risks occasioned by third party development.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-061	Transport and Access	Draft DCO Protective Provisions	Paragraph 4 – General To ensure that routine maintenance work to the highway does not compromise the integrity of any assets co-located in the subsoil.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-062	Transport and Access	Draft DCO Protective Provisions	Paragraph 7 – Prior approvals and security To ensure that the specification of the specified works and all associated processes inc. traffic management, financial provision for ongoing maintenance liabilities, scope of maintenance, condition surveys and road safety audits are addressed prior to commencement of works affecting the SRN. All of this information is required whether the specified works comprise of works to the highway or not. For example, scaffolding erected either side of the highway to install overhead lines would require a scheme of traffic management, as it would not be safe to carry out such dangerous works over an online part of the SRN. Likewise, undergrounding a pipeline or cable via horizontal directional drilling could not take place without condition surveys of the SRN taking place prior to commencement of works, as without this it would be impossible to know whether the specified works had caused subsidence or displacement in the carriageway. NH also requires collateral warranties from any contractor and designer of the specified works affecting the SRN, to ensure appropriate contractual liabilities are recoverable. No exercise of any article set out in 7(2) should take place without the express consent of NH, to ensure that NH	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			is aware of the progress of the specified works affecting the SRN, the scope of those operations, the potential impact to road users and to ensure that compulsory acquisition is managed appropriately and proportionately.	
NH-063	Transport and Access	Draft DCO Protective Provisions	Paragraph 8 – Construction of the specified works The construction of the specified works must be carried out in accordance with NH's road space booking procedures to ensure the safety of road users and other contractors on the network. They must also be carried out in accordance with the relevant technical standards where relevant to the works, to ensure consistency with the SRN. Emergency access is to be granted to NH in the event of or to prevent the occurrence of danger to the public.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-064	Transport and Access	Draft DCO Protective Provisions	Paragraph 9 – Payments The reasonable costs incurred by NH in the administration of the design approval process, the transfer of land, supervision of works, legal costs and VAT should be payable by the Applicant. But for the Applicant's scheme, NH would not have to expend resources on the specified works.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-065	Transport and Access	Draft DCO Protective Provisions	Paragraph 10 -Provisional Certificate Where any specified work is proposed to the SRN, on, over or under the highway,	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the requirements of NH's design checking and approval process is required to be discharged. Works underneath the highway or oversailing it have significant potential to cause damage both to the highway itself and to road users and it is critical to the safe and efficient operation of the SRN that works are signed off by NH engineers as safe, where there is an interface with the SRN. This provision is also required for the purposes of the Applicant as it has the effect of reducing the bond sum to 20% on the issue of the provisional certificate.	
NH-066	Transport and Access	Draft DCO Protective Provisions	Paragraph 11- Opening This is relevant only where the SRN has been subject to traffic management orders or temporary closure as a result of the Authorised Development.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-067	Transport and Access	Draft DCO Protective Provisions	Paragraph 12 – Final condition survey Where specified works include horizontal directional drilling, as part of the approval of works and prior to commencement, a condition survey of the highway is required. A final condition survey is required on completion of the horizontal directional drilling works, to identify any settlement of the carriageway in accordance with the threshold levels set out in technical standard DMRB CD622. If any settlement beyond tolerance is identified, this would pose a safety risk to road users, as part of	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the carriageway would have collapsed to unsafe levels. NH would require this defect to be remedied. This provision also applies to works to the SRN itself as any final condition survey would inform the decision on issue of the final certificate.	
NH-068	Transport and Access	Draft DCO Protective Provisions	Paragraph 13 – Defects Period On the issue of the provisional certificate, the Applicant will be required to remedy any defect in the SRN caused by the specified works for a period of 12 months. Where NH's network is damaged by works carried out pursuant to the DCO, it is for the Applicant to remedy that damage.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-069	Transport and Access	Draft DCO Protective Provisions	Paragraph 14 – Final certificate This provision is required in order to release the bond in full, to ensure that the NH costs are paid by the Applicant and to ensure that NH is given a final opportunity to inspect the SRN and be satisfied that the specified works have not resulted in damage to the statutory undertaking.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-070	Transport and Access	Draft DCO Protective Provisions	Paragraph 15 – Security The Applicant is proposing to carry out works to the highway and beneath the highway in land owned by NH. These works may be commenced and not completed, may be constructed contrary to the approved design or may be suspended due	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to the dissolution of the Applicant. In such cases, NH is exposed to a potentially significant financial burden in removing the works from the highway estate. Outside the Planning Act 2008, payment for any works which an authority are authorised to execute (i.e. not just works to the highway itself) may be secured under a section 278 agreement, with such a payment being secured through a bond or cash deposit. In the absence of any commitment by the Applicant to enter into a section 278 agreement containing provisions to put security in place for the benefit of NH, the NH protective provisions require security in a manner which is consistent with the measures applying to developments carried out under the Town and Country Planning Act 1990, applying the provisions of the Highways Act 1980. The NH protective provisions are an appropriate mechanism to assure security such as a bond and without this, NH would be faced with potentially significant financial liabilities for which it is not funded and has no budget.	
NH-071	Transport and Access	Draft DCO Protective Provisions	Paragraph 16 -Commutated sum Where the Applicant proposes to install apparatus on the highway, a commuted sum is required to contribute to the maintenance of the apparatus. It is not for the public purse to pay for maintenance of	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			apparatus that is added to the highway estate as a consequence of third party development, without contribution.	
NH-072	Transport and Access	Draft DCO Protective Provisions	Paragraph 17 – Insurance Insurance is required of all contractors working on the SRN and this should extend to operations carried on over and under the highway due to the potential for damage to infrastructure, highway assets and road users.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-073	Transport and Access	Draft DCO Protective Provisions	Paragraph 18 – Indemnity NH must be held harmless for the construction, maintenance and operation of the Authorised Development and any resultant impacts and it is common practice for statutory undertakers to be indemnified in such circumstances. It should not be for the public purse to cover instances of loss or damage occasioned by third party works.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-074	Transport and Access	Draft DCO Protective Provisions	Paragraph 19 – Maintenance of the specified works To ensure that where maintenance to a specified work is required, the relevant road space booking procedures are complied with to ensure the safety of contractors and road users.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-075	Transport and Access	Draft DCO Protective Provisions	Paragraph 20 – Land To ensure that matters of compulsory acquisition are directed to the legal team at	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			NH and to ensure that powers are not exercised by way of GVD circumventing NH's ability to impose restrictions and controls on the use of the land in a way which would impact on the SRN or be detrimental to safety.	
NH-076	Transport and Access	Draft DCO Protective Provisions	Paragraph 21 – Expert Determination Expert determination is preferred due to the speed of the process and the often technical nature of the points in dispute being more suited to determination by an Engineer or other highway professional.	The Applicant notes NH's comment and is engaging with it to agree the form of Protective Provisions.
NH-077	Transport and Access	Summary	For the reasons given above, NH objects to the DCO and the Authorised Development and requests that the NH protective provisions at Appendix 1 are included on the face of the Order. Should it assist the ExA, NH will respond to any written questions that the panel may have and is willing to attend an appropriate hearing to detail the impacts of the Authorised Development to NH.	The Applicant notes this comment.



3.6 Natural England

Table 3.6: [RR-1242](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NE-001	General	Summary of representation	Summary of Natural England's advice Natural England is concerned about the potential for impacts to the Upper Nene Gravel Valley Pits Special Protection Area (SPA) Functionally Linked Land (FLL). The key concerns relate to the survey methodology, the quantity of identified FLL, the quantum of mitigation proposed and site selection for mitigation. We note and welcome that the applicant has said they will seek consultation with NE on the design of the mitigation.	The Applicant has engaged in further consultation with Natural England to discuss these matters, and a meeting was held between Natural England and the Applicant's ecologist on 6th October 2025. The matters of concern were discussed and clarified, with Natural England being satisfied with the Applicant's survey methodology, approach to classifying FLL, and offering of mitigation land (subject to their review of the detailed survey information contained within the ES Appendix 9.9 Wintering Bird Surveys report [APP-092] and HRA Revision A [EX1/GH7.21_A]). The HRA Revision A [EX1/GH7.21_A] will be amended as needed to address any remaining concerns; as discussed with Natural England, figures showing the location of mitigation fields will be prepared and appended to the HRA.
NE-002	General	Position of Natural England	Part I: Summary and conclusions of Natural England's advice Natural England's advice in these relevant representations is based on information submitted by Green Hill Solar Farm in support of its application for a Development Consent Order ('DCO') in relation to the development of a solar project	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			(‘the project’). Part I of these representations summarises what Natural England considers the main issues¹ to be in relation to the DCO application and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. Natural England may have further or additional points to make, particularly if further information about the project becomes available. Our comments are set out against the following sub-headings which represent our key areas of remit: • Internationally designated sites • Nationally designated sites • Protected species • Biodiversity net gain • Nationally designated landscapes • Soils and best and most versatile agricultural land • Ancient woodland and ancient/veteran trees • Connecting people with nature (National Trails, open access land and England Coast Path) • Other valuable and sensitive habitats and species, landscapes and access routes Our comments are flagged as red, amber or green: • RED are those where there are fundamental concerns which it may not be possible to overcome in their current form. •	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			AMBER are those where further information is required to determine the effects of the project and allow the Examining Authority to properly undertake its task and or advise that further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy. • GREEN are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured). Natural England has been engaged by the applicant via our Discretionary Advice Service (DAS) for this project. We have provided advice primarily on the scope of bird survey. We have also provided comment at the statutory EIA Scoping and Section 42 consultation stages of the project. We have not been engaged regarding the development of a Statement of Common Ground (SoGC) or any other supporting documentation, such as a Letter of No Impediment (LoNI). If the applicant wishes to develop any such documentation, further engagement should be sought in due course. In the absence of a SoCG, Natural England advises that the matters set out in these representations will require	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			consideration by the Examination Authority as part of the examination process. These representations provide an overview of the issues and a summary of Natural England's advice, our overall view on the application and the main issues which we consider need to be addressed by the Secretary of State. These representations set out all the significant issues which remain outstanding, and which Natural England advises should be addressed by the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. These are primarily issues on which further information would be required in order to allow the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and to flesh out mitigation proposals to provide a sufficient degree of confidence as to their efficacy. Natural England will continue discussions with Green Hill Solar to seek to resolve these concerns and agree outstanding matters in a Statement of Common Ground. Failing satisfactory agreement, Natural England advises that the	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			matters set out in Section 4 will require consideration by the Examining Authority as part of the examination process. The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process.	
NE-003	Ecology and Biodiversity	Internationally designated sites Special Protection Area	2. The natural features potentially affected by this application Internationally designated sites – AMBER The proposal is adjacent to Upper Nene Valley Gravel Pits Special Protection Area (SPA) and RAMSAR at its closest point. The Upper Nene Valley Gravel Pits SPA is designated for its Annex I species: Bittern, Golden plover, Gadwall and the wider waterbird assemblage. Whilst the proposal would not result in the direct loss of Upper Nene Valley Gravel Pits SPA, it has the potential to result in the loss of land used by the qualifying features outside of the SPA boundary. Where land outside of the boundaries is frequently used by the qualifying features, this land supports the functionality and integrity of the SPA and will contribute to the achievement of the SPAs'	The Applicant notes and agrees with this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			conservation objectives and is therefore protected in this context. This land is considered functionally-linked land (FLL).	
NE-004	Ecology and Biodiversity	Internationally designated sites Special Protection Area Habitat Regulation Assessment	Survey Effort Green Hill Solar have engaged in DAS with Natural England regarding the required survey effort to identify parcels of FLL. Table 1 in the Habitats Regulations Assessment (HRA) [APP-565] 'summary of Natural England consultation' states that "NE did not clarify their position but stated their preference to view full survey data before making a decision". In fact, Natural England have stated that we are content with the number of surveys conducted given the applicant's precautionary approach to considering any inadequately surveyed land to be FLL. We have expected to discuss the delivery of mitigation with the applicant at a later stage. Since our last advice of the 11th March 2025, we have not been provided any further detail on survey results or proposed mitigation. The HRA states that 67.49 hectares of functionally linked land would be impacted by the development. This conclusion is based on winter surveys carried out over 2 years. Natural England advised that surveys for functionally linked land should be two	The Applicant's ecologist had sought clarification from Natural England on the scope of mitigation land needed during the design phase of the Scheme. However, as per Table 1 of the HRA Revision A [EX1/GH7.21_A], this clarity was not provided at the time. The HRA Revision A [EX1/GH7.21_A] sets out the rationale behind the assessment of Functionally Linked Land (FLL) and the mitigation land offered. This was made in the absence of a formal guidance document (it is understood that a Supplementary Planning Document is in the process of being drafted but is not ready for publication) or clear advice from Natural England, despite the Applicant's ecologist seeking such clarity, as discussed above. The use of the field level as the scale for assessing FLL is justified in the HRA. Site land parcels are an arbitrary and highly variable size and ultimately, in the decision-making process undertaken by the birds in choosing locations to forage in, field selection is a key fine-scale decision. The selection of one field over another by the birds is based on a number of parameters, including, but not limited to: crop type, soil moisture, topography, 'openness', disturbance and shelter. Typically, selected



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			winter seasons of diurnal surveys (six visits per season) and two years of nocturnal surveys (three visits per season) at all sites within 10km of the site boundary. The applicant has done this. However, after the fact, the parcels of surveyed land are split into fields and the functionality is then placed onto individual parcels as opposed to the one large parcel that was surveyed. For this approach to work, Natural England need to understand the rationale around how survey results have been interpreted; including an explanation of how the land has been divided, the functionality assessed and how this informs the overall conclusion. If birds were found on one field and the entire parcel is similar in regard to topography, disturbance, no changes to habitat character etc, there is no reason why SPA birds might not use all fields within that parcel. It is not clear what proportion of the land parcel has been surveyed. Natural England have significant concerns around how the survey data has been interpreted and whether or not the appropriate extent /quantum of potentially affected SPA FLL has been identified.	fields are of a minimum size, and this minimum size requirement provides a consistency which is not present among the sizes of the wider land parcels. Moreover, defining pattern use - a key component of determining FLL - can only be done at a clearly defined spatial scale. In light of all of these considerations, the field scale was considered more important and relevant than the site/land parcel scale. The Applicant would reiterate that an evidence-based approach, using the extensive survey dataset collected, has been used to inform the categorisation of FLL. The intimation from Natural England that areas of land which did not support significant numbers of birds during the surveys, could nonetheless be classified as FLL, is at odds with the gathering of extensive survey data to identify actual and fine-scale usage and usage patterns. The ES Appendix 9.9 Wintering Bird Survey [APP-092] and HRA Revision A [EX1/GH7.21_A] give full details of the survey results. The survey area is also defined within these documents. To inform impacts on the SPA, all land within the Green Hill Solar PV sites which lies within 10km of the SPA was surveyed: this is the entirety of Green Hill B to G inclusive. As discussed in the response to 'NE-001', during the meeting on 6th October 2025, the approach to classifying FLL was discussed and agreed with Natural England. As such, this



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				matter is now taken to be resolved. A Draft Statement of Common Ground [EX2/GH/8.3.6] is being progressed and will be submitted at Deadline 2.
NE-005	Ecology and Biodiversity	Ecological Protection and Mitigation Strategy Habitat Regulations Assessment	Quality and effectiveness of mitigation proposals We note that an Ecological Protection and Mitigation Strategy (EPMS) has been prepared to support this submission, but it has not been made available for our review. At this time, it is not clear whether or not this document contains information on the mitigation required to satisfy the requirements of the Habitats Regulations. Our comments below are made without knowledge of the contents of the EPMS. The Habitats Regulations Assessment [APP-565] sets out that 98.48 hectares of habitat will be created to mitigate for the loss of FLL. Natural England require further information on this proposed mitigation, the suitability of these parcels of land and the proposed habitat creation, management and monitoring. Each land parcel proposed as mitigation requires a site-specific assessment to show that it can replace any impacted functionality of the extant FLL. This	The OEPMS Revision A [EX1/GH7.5_A] was not initially made available on the public examination library due to a confidential Method Statement. A redacted OEPMS Revision A [EX1/GH7.5_A] has been provided, and the complete document has since been issued to Natural England for their review. It should be clarified that the OEPMS does not contain details on the provision or management of mitigation land or the ecological monitoring schedule proposed, and this information is instead contained within the OLEMP Revision A [EX1/GH7.4_A]. Section 7 (Appropriate Assessment) of the HRA Revision A [EX1/GH7.21_A] sets out the total quantum of mitigation habitat to be provided, and also breaks this down by individual field parcels, with the existing and proposed habitats detailed (see Table 3 of the HRA). As per the response to 'NE-001', a meeting was held with Natural England which clarified the proposed FLL mitigation areas. Subject to review of detailed survey data, Natural England were satisfied with the offering of mitigation land. The fields will be managed for the lifetime of the development. A finalised management and monitoring programme, and associated costing



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			assessment should include (but not be limited to) a consideration of: Habitat suitability: • How does the proposed habitat support the qualifying feature, how easy/realistic is it to establish the habitat at the chosen location • Field Size; what is the minimum required parcel for the qualifying features to use a site? • Shape; squarer parcels are preferred to elongated. • Aspect; does the site offer favoured warmer south-facing aspect? • Sight lines; Are there any aspect or screening considerations which hinder bird sightlines? • Soil; type & drainage, hydrological factors • Time to create; will the mitigation habitat be in place prior to any impacts to FLL, how quickly can it be established? • Other ecological factors that may influence habitat suitability. Habitat context:	exercise, will be drawn up to accompany the detailed LEMP, secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• What is the surrounding land use, in terms of: Boundaries; does the field maintain open sight / flight lines, or is it enclosed? Is it visible from outside or well screened? What is the likely predator pressure/suitability? • Adjacent land uses, esp. any sources of disturbance e.g. solar panels; footpaths; roads; lighting etc. • Proximity to housing; which may suggest an existing level of disturbance by dogs / cats, whether this is formal or informal etc. Proximity to other FLL or landscape connectivity. Continuity of function with adjacent parcels may increase resilience. Habitat proximity: • How close is the parcel to the SPA, in particular those areas where the qualifying features are known to be present, or should be present? • How far are the relevant qualifying features known to travel to supporting habitats?	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			While the above considerations should lead to a robust assessment of the appropriateness of proposed mitigation, it is noted that a number of the proposed mitigation fields are not currently in use by the qualifying features. Where fields are not already in use an extra level of assessment may be necessary when compared with the proposed enhancement of existing FLL sites. The mitigation measures must be managed and maintained for the lifetime of the development (and any associated potential negative impacts from the development proposal). We would recommend that a monitoring programme is in place to monitor both the establishment and monitoring of the prescribed habitats, as well as their functionality for birds. We would advise that any management and monitoring program is fully costed to ensure financial certainty of delivery. We welcome the opportunity to work with the applicant to review the proposed mitigation in more detail.	
NE-006	Ecology and Biodiversity	Nationally designated sites	Nationally designated sites - GREEN Natural England is satisfied that 'green' issues are unlikely to result in adverse effects on the following nationally designated sites, subject to	The potential impacts upon each SSSI have been considered in the impact assessment within the ES Chapter 9 Ecology and Biodiversity [EX1/GH6.2.9_A] , with corresponding additional mitigation measures



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the appropriate mitigation/compensation being adequately secured. Environmental Statement Chapter 9 (May 2025) includes an assessment of impacts to ecology and biodiversity, including impacts on nationally designated sites. There are a large number Sites of Special Scientific Interest (SSSI) within close (<5km) proximity of the development proposal. For most of the SSSIs listed, the qualifying interest features have not been fully identified or set out. Whilst all sites have been considered, a summary table which shows the qualifying interest features for each site, consideration of the relevant impact pathways and mitigation measures would be useful. Natural England agrees with the conclusion of the assessment in relation to impacts to SSSIs.	detailed, as necessary. Given the number of SSSIs and other designated sites within the Zone of Influence of the project, designated sites have been grouped based on their proximity to the Order Limits in the ES Chapter 9 Ecology and Biodiversity [EX1/GH6.2.9_A], with impact pathways for each grouping detailed. Given that Natural England agree with the conclusion of the assessment, it is assumed that sufficient information has been provided to inform their conclusion, and therefore it is not intended for the Applicant to provide further information/tabulation at this stage.
NE-007	Ecology and Biodiversity	Protected Species Letter of No Impediment	Protected species - AMBER At this stage, Natural England has not been engaged regarding the production of a Letter of No Impediment (LoNI) for protected Species Licences. Where this is required, submission of draft protected species licence applications	Impacts on protected species (and, by extension, the requirement for protected species mitigation licences) have been avoided as far as possible through sensitive design of the Scheme, including the implementation of a range of protective buffers around sensitive ecological features, such as badger setts and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			would be required for review. Information relating to wildlife licencing and NSIPs is provided within the Planning Inspectorate's Advice Note 11, Annex C. Specifically, at the bottom of page 6 and within Appendix I. In the absence of draft protected species licences, Natural England is unable to determine whether a licence is likely to be granted. Aside from these comments, our advice at this stage is limited to our Standing Advice.	trees suitable for roosting bats. At the time of submission, the only protected species licence which is certain to be required is the great crested newt District Licence, which is being secured in collaboration with NatureSpace. Although there may be a requirement for other mitigation licences during construction (for example, if a new badger sett is created which will need to be closed under a licence to facilitate construction work), the requirement and scope of any required licences such as this is not currently known. As such, a Letter of No Impediment is currently considered not to be required.
NE-008	Ecology and Biodiversity	Biodiversity Net Gain	Biodiversity net gain - GREEN Biodiversity Net Gain (BNG) is a demonstrable gain in biodiversity assets as results of a development project that may or may not cause biodiversity loss, but where the final output is an overall net gain. The Environment Act has set out that BNG will be mandatory for the majority of new development from November 2023 and mandatory for NSIPs in 2025. Whilst BNG is not yet mandatory for NSIPs, it is considered best practice to deliver a measurable net gain through any new development. Natural England welcomes the applicant's significant	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			BNG delivery proposals for habitats, hedgerows and water courses.	
NE-009	Landscape and Visual	Nationally designated landscapes	Nationally designated landscapes – GREEN The proposed development is not located within, or within the setting of any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of the development. The examining authority should have regard for the landscape character of the area. We welcome reference to Natural England's National Character Areas and other Local Landscape Character Assessments within ES Chapter 8. We would also like to stress the importance of assessing potential cumulative landscape impacts from the development.	The Applicant notes this comment. ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail with reference to Natural England's National Character Areas. ES Appendix 8.4: Landscape Character Area Descriptions [APP-082] contains descriptions of Landscape Character Areas from the National Scale (NCAs) to the various District Landscape Character Assessments for Northamptonshire, Milton Keynes and Bedford. A cumulative assessment has been undertaken within the LVIA, assessing both the cumulative landscape and visual effects of the Scheme in conjunction with other local developments. The Cumulative Developments assessment considers the additional effects resulting from the Scheme in combination with the effects resulting from other similar developments, these being other renewable projects taken together.
NE-010	Agriculture and Soils	Best and Most Versatile	Soils and best and most versatile agricultural land - GREEN Natural England welcomes that a detailed ALC survey has been undertaken across the main site as seen in the Environmental Statement Chapter 20: Agricultural Circumstances [APP-057]. However, a detailed ALC survey	The Applicant notes the recognition of the detailed ALC survey having been undertaken across the main sites. The ALC survey has been undertaken in accordance with the published guidelines and, for the main sites, therefore covers all areas where there may be sealing of the soil (for example for substations and the BESS, as set out in Section 20.8 of ES



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			is typically expected for the full application site, including the proposed cable route and any areas of permanent sealing. It is recognised that a proportion of the agricultural land will experience temporary productive land loss. In order to both retain the long term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development (during construction and decommissioning), it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management and appropriate soil use, with consideration on how any adverse impacts on soils can be avoided or minimised. It is considered that as the solar panels would be secured to the ground by steel piles with limited soil disturbance, they could be removed in the future with no permanent loss of agricultural land quality likely to occur, provided the appropriate soil management is employed and the development is undertaken to high standards. Given the proposed lifespan of the proposed development of 60 years, the areas of hardstanding will be fully removed	Chapter 20: Agricultural Circumstances [APP-057]. An outline Soil Management Plan has been prepared to set out the soil management strategy, approach and key measures during construction, operation and decommissioning stages. The OSMP [APP-550] will be further developed into a detailed Soil Management Plan using the results of Soil Resource Survey to be conducted at the Cable route as secured in Schedule 2, Requirement 19 of the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			from agricultural purposes for the lifetime of the proposal and therefore should be considered permanent land take.	
NE-011	Agriculture and Soils	Best and Most Versatile Cable Corridor	General guidance for protecting soils during development is available in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and should the development proceed, we recommend that relevant parts of this guidance are followed, e.g. in relation to handling or trafficking on soils in wet weather. Natural England agrees with scoping opinion ID 3.16.2: 'The Inspectorate expects that an ALC for the whole site, including the Cable Corridor, will be undertaken to support the ES unless there is substantial justification dictating otherwise'. The applicant has provided a response that 'Due to temporary and minimal disturbance on soils and agricultural land along the Cable Route Corridor during construction, a Soil Resource Survey will be undertaken post consent and preconstruction (instead of an ALC survey) to inform the development of a detailed Soil Management Plan (DSMP).' It would be expected that an ALC survey should be undertaken within the cable corridor order limits,	The Applicant notes the reference to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, a guidance document which has been used to inform the assessment and the development of soil mitigation, as set out in Section 20.3 of ES Chapter 20: Agricultural Circumstances [APP-057]. A detailed ALC survey has been undertaken across the main sites in accordance with the published guidelines, resulting in a significant amount of detailed ALC survey data being available to the project. As noted, the cable routes were not surveyed due to the temporary and minimal disturbance which would occur; however a commitment has been made, as set out in the OSMP [APP-550] that soil resource surveys will be undertaken along the cable route (once the actual design is fixed) to inform the development of the detailed Soil Management Plan (and this is secured in Schedule 2, Requirement 19 of the Draft DCO Revision A [EX1/GH3.1_A]). This will provide sufficient baseline information to ensure that the pre-construction land condition can be reinstated following cable installation.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			so as to identify the soil types and ALC grades to inform the EIA, as well as the soil handling and restoration criteria.	
NE-012	Agriculture and Soils	Outline soil management plan	Natural England welcomes the preparation of an outline soil management plan (oSMP). Natural England welcomes the use of the EIA methodology set out in IEMA 2022. The applicant states that the lack of site specific information for the cable corridor is not a limitation to the assessment (paragraph 20.5.2), however the extent of soil disturbance along a cable corridor should not be considered small scale, with potential loss and degradation of the soil resource, which can result in a downgrading of the ALC (and subsequent loss of BMV) if not handled and restored appropriately. The land take due to the construction of the BESS is considered permanent land take due to the sealing of the land. The magnitude of this impact should be considered as such.	The Applicant notes the positive response to the production of an OSMP [APP-550] The Applicant recognises the fact that there will be soil disturbance during the installation of the cables. This is set out in the commitment, as detailed in the OSMP [APP-550] that soil resource surveys will be undertaken along the cable route (once the actual design is fixed) to inform the development of the detailed Soil Management Plan (and this is secured in Schedule 2, Requirement 19 of the Draft DCO Revision A [EX1/GH3.1_A]). This will provide sufficient baseline information to ensure that the pre-construction land condition can be reinstated following cable installation. The impact as a result of all elements of the Scheme have been included in Section 20.8 of ES Chapter 20: Agricultural Circumstances [APP-057]. The Scheme is temporary and will be decommissioned at the end of its operational life, as detailed in ES Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A], and the impact magnitude has been based on the impact magnitude assessment tables set out by Institute of Sustainability and Environmental Professionals (ISEP) (formerly known as Institute of Environmental Management and Assessment



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				(IEMA)) and DMRB (Design Manual for Roads and Bridges).
NE-013	Agriculture and Soils	Outline soil management plan	The landscape planting or habitat creation should be informed by the soil type present, rather than the proposed landscaping informing the preferred soil profile (Paragraph 20.7.4).	Paragraph 20.7.4 of ES Chapter 20: Agricultural Circumstances [APP-057] states that <i>"For areas of landscape planting or habitat creation, soil profiles to be created using available soil resources that support the required end use"</i> . This requires that both on-site available soil resources are re-used and that they are deemed capable of supporting the required end use. This requirement will therefore necessitate a coordinated approach to detailed landscape design across landscape architects and soil scientists ensuring that planting is designed to suit the available resources.
NE-014	Agriculture and Soils	Outline soil management plan	Natural England welcomes the balanced consideration on the potential benefits to soil health (paragraph 20.8.28 in Chapter 20), which expresses some uncertainty in the overarching impact. However, this should be reflected in the assessment presented in Paragraph 20.8.20. The magnitude of impact should be a potential temporary improvement, i.e. Minor magnitude of change, with any potential benefits only extending to the duration of the arable reversion. This would extend to the area under panels only and not land subject to sealing. As stated in the Chapter,	Paragraph 20.8.18 of ES Chapter 20: Agricultural Circumstances [APP-057] states makes it clear that the potential beneficial impacts would only occur between and under the panels and thus this part of the assessment has not included those areas where there will be soil sealing. The stated impact assessment is driven by the criteria set out by Institute of Sustainability and Environmental Professionals (ISEP) (formerly known as Institute of Environmental Management and Assessment (IEMA)) and are noted to be 'potential' benefits to account for the uncertainty which is described in paragraph 20.8.18 of ES Chapter 20: Agricultural Circumstances [APP-057]



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			arable reversion to grassland has been shown to benefit soil organic matter (SOM). However, there could be a disbenefit to the soil resource due to unknowns as a result of the solar development infrastructure. It is currently unclear as to what impact the solar panels may have on the soil properties such as carbon storage, structure and biodiversity. For example, because of changes in shading; temperature changes; preferential flow pathways; micro climate; and vegetation growth caused by the panels. Therefore, it is unknown what the overall impact of a temporary solar development will have on soil health. The potentially Minor to Moderate (Significant) beneficial effect on agricultural land identified in Paragraph 20.8.21 would have to see an increase of SOM to 6-10% depending on the clay content to make these soils organic-mineral soils. The current OM content has not been determined; therefore, this statement is highly presumptive.	We acknowledge that the current soil organic matter is not tested and the changes of shading and temperature from the panels will result in lower organic matter accumulation under panels due to lower grass growth rate and biomass compared to unshaded areas. However, the benefit of soil organic increase from long-term grassland, non-tillage and minimum tillage is well documented, and non-tillage and minimum tillage are now more common practice in farming for increasing soil organic matter and improving soil structure etc. Although the increase of organic matter under panels is lower compared to areas without panel shading, it will still increase soil organic matter, reduce soil disturbance and increase soil structure significantly over the proposed scheme lifetime compared to arable use. Data from NRM (https://cawood.co.uk/wp-content/uploads/2024/10/NRM-Soil-Summary-2023-2024.pdf) and Soil Association Exchange (https://www.fwi.co.uk/arable/land-preparation/soils/new-reports-reveal-arables-impact-on-the-environment) indicates that the organic matter of arable farmland is 5.4%-5.7%. Therefore, we believe that within the lifetime of the proposed scheme, some of soil organic matter will increase beyond 6% and the potentially Minor to Moderate (Significant) beneficial effect on agricultural land is realistic.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NE-015	Agriculture and Soils	Outline soil management plan	Natural England disagree that the residual effect on soil function during decommissioning would be the same as in the operational phase. Any potential benefits arising as a result of arable reversion will only extend to the duration of the arable reversion. The effects after decommissioning will depend on the soil management and use. Where developments have been identified with overlapping boundaries in the cumulative assessment (section 20.11), opportunities to minimise the disturbance of the same swathes of land should be explored, for example the laying of cabling within the same trenches at the same time, where possible.	The Applicant agrees that the positive residual effects following decommissioning would be subject to the post-decommissioning land use in the long-term. If realised, positive changes to soil characteristics would persist for some time and would support enhanced production following decommissioning; as such the residual effects have been stated to be the same as for the operational phase.
NE-016	Agriculture and Soils	Outline Soil Management Plan	The soils disturbed along the cable corridor should be restored to the ALC baseline. This should be included as a commitment in the oSMP. Following decommissioning, the reinstated soils should be assessed to ensure the baseline ALC has been retained, and any remediation actions prescribed where required to achieve the baseline ALC. We welcome that the oSMP includes a requirement that the developer uses an appropriately experienced soil	Paragraph 5.6.3 of OSMP [APP-550] requires that soils are restored to their previous condition and previous ALC grade and does not distinguish any difference in approach between the main site and the cable routes. The outline Soil Management Plan sets out the measures required to achieve this, and these will be developed further into the detailed Soil management Plan before construction commences. As set out in the OSMP [APP-550] in paragraph 4.1.3 provides confirmation that the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			specialist. This specialist should advise on, and supervise, soil trafficking and handling, including identifying when soils are dry enough to be handled.	Soil Scientist would be responsible for undertaking soil plasticity assessments.
NE-017	Agriculture and Soils	Outline Soil Management Plan Soil Volume	Natural England welcome the consideration of the soil volume and that no surplus soil will be generated. The oSMP should also include appropriate agricultural land management and/or biodiversity enhancement during the lifetime of the development, to ensure that at the end of the operational phase, following decommissioning, the agricultural land quality is the same as the baseline ALC. Section 5.6 Soil Reinstatement: soil handling should be undertaken as per construction phase, i.e. when the soils are dry and friable. The oSMP should include decompaction during decommissioning, where required.	The Applicant notes the positive response to the commitment to re-use soil materials within the Scheme. The OLEMP Revision A [EX1/GH7.4_A] sets out the management activities which would be undertaken during the lifetime of the Scheme. Section 5.6 of OSMP [APP-550] makes reference to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, which requires soils to be handled when in a suitable dry state. The outline Soil Management Plan will be developed into a detailed Soil Management Plan (and this is secured in Schedule 2, Requirement 19 of the Draft DCO Revision A [EX1/GH3.1_A]) where full details of the reinstatement (both post construction and post-reinstatement) processes will be set out.
NE-018	Arboriculture	Ancient woodland Veteran trees	Ancient woodland and ancient/veteran trees – GREEN Natural England advise that impacts on ancient woodland and ancient and veteran trees should be considered in line with paragraph 193 of the NPPF. Natural England and the Forestry Commission have also produced	The Applicant notes this comment. Paragraph 193 of the NPPF as well as Natural England and the Forestry Commission's Standing Advice have been considered and included in ES Chapter 19 Arboriculture [APP-056] .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees.	



3.7 Northamptonshire Fire and Rescue Service

Table 3.7: [RR-1245](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NFRS-001	General	Introduction	The applicant has engaged with Northamptonshire Fire and Rescue Service (NFRS) and been very forthcoming in providing application details and supporting information.	The Applicant is progressing the Northamptonshire Fire and Rescue Statement of Common Ground [EX2/GH8.3.8] .
NFRS-002	Transport and Access	BESS access	The applicant and NFRS are in broad agreement about the suitability of the fire service access provision at Grendon BESS site. NFRS would like to see improvements to the fire service access provision at site C should a BESS be located on this site, to include the provision of a staging area from which to base firefighting efforts and improvements to the proposed access road to ensure appropriate passing places for fire tender.	The Applicant is updating the layout to provide additional laybys and space for fire tender vehicles to alight within a staging area within the Site.
NFRS-003	Hydrology and Flood Risk	BESS safety Fire water	The applicant and NFRS are in broad agreement about the suitability of the proposed provision of water for firefighting.	The Applicant welcomes Northamptonshire Fire and Rescue Service's confirmation of agreement on the proposed firefighting water provision for the BESS, as set out in the OBSSMP Revision A [EX1/GH7.7_A] .
NFRS-004	General	Fire Safety	NFRS expects the applicant to continue to have regard for NFCC guidance for grid scale energy storage systems as this develops.	The Applicant notes this comment, any revisions to NFCC guidance as the Scheme develops will be incorporated into the detailed Battery Safety Management Plan which is secured by Requirement 6, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A] . The



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Northamptonshire Fire and Rescue Service will be consulted as part of the requirement discharge. This will be prepared taking into account the latest BESS safety planning and documentation. Any deviations from NFCC guidance will be fully agreed with NFRS.



4 The Applicant's Responses to Other Statutory Consultees, International Agencies, Undertakers, and Elected Representatives

4.1 Sarah Bool MP

Table 4.1: [RR-1037](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SBMP-001	General	National Policy Statement	The National Policy Statement outlines that the starting position for solar PV developers in taking forward Nationally Significant Infrastructure Projects is that applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality.	The Applicant sets out a full planning policy appraisal in the Planning Statement [APP-559] which includes agriculture and site selection in Section 6. Policy Compliance Document [APP-567] provides a comprehensive assessment of how the Scheme accords with relevant national and local planning policy. Paragraph 6.16.4 of the Planning Statement [APP-559] sets out how National Policy Statement EN-1, at paragraph 5.11.34, makes clear that applicants must provide justification if schemes are proposed to be located on best and most versatile agricultural land. This justification has been provided by the Applicant in ES Chapter 5: Alternatives and Design Evolution [APP-042] and ES Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]. At paragraphs 2.10.30 and 2.10.31 of EN-3 (November 2023), it is clarified that whilst the development of ground mounted solar arrays is not prohibited on sites of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				agricultural land classified 1, 2 and 3a, or designated for their natural beauty, or recognised for ecological or archaeological importance. It is recognised that at this scale, it is likely that applicants' development may use some agricultural land. However, applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land. The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification.
SBMP-002	Agriculture and Soils	Extent of ALC Grading across the site	The Green Hill Solar Farm sites are – as it states on the applicant's website – “approximately 1,200 hectares (ha) of predominantly agricultural land”. Of this, the total BMV land affected by the Scheme is 854.5ha, accounting for 65%. Grade 4 land is only used for Cable route corridors. Site A comprises 76.3% BMV including 3.4% Grade 1 land	The breakdown of the agricultural land classification grade across the Scheme is set out in ES Chapter 20: Agricultural Circumstances [APP-057], the Applicant acknowledges that 65% of the Scheme is BMV land that will be temporarily used for the purposes of accommodating Solar PV Development and associated infrastructure. The land will be returned to the landowners after decommissioning of the Scheme, allowing a return of arable management of the land. Whilst there is



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Site A.2 comprises 77.1% BMV • Site B comprises 41.9% BMV • Site C comprises 78.9% BMV • Site D comprises 90.2% BMV • Site E comprises 60.8% BMV including 2.7% Grade 1 land • Site F comprises 61% BMV • Site G comprises 75.6% BMV • Battery Energy Storage System (BESS) comprises 54.9% BMV This is in stark contradiction to Government guidelines.	no obligation for the landowners to return the land to arable production, just as at present there is no obligation to maintain arable management, the Applicant must comply with a Soils Management Plan approved under Requirement 19 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] which will ensure the quality of the soil is not degraded, and will likely be improved, during the operation of the Scheme. This approach is consistent with paragraph 2.10.34 of NPS EN-3. The Applicant has undertaken a 5-Stage Site Selection Process, widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area (Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]) in compliance with National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection, based on commercial feasibility and the efficiency of the transmission of electricity to the grid. The search outcome indicates that the majority of the land within the 20km search area is Grades 3 or 2 land with high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results of the Scheme.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Section 7 of the Planning Statement [APP-559] concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need and confirmed in NPS EN-1 (see paragraphs 3.2.6 to 3.2.8), outweighs the reversible loss of 65% BMV agricultural land for the duration of the Scheme. The Applicant also notes that EN-3 (November 2023), paragraph 2.10.29 states that land type should not be the predominating factor in determining the suitability of a site for solar development and will be considered by the Secretary of State in making a decision on the application.
SBMP-003	Agriculture and Soils Cultural Heritage	Size and context of the site	This development is a unique and complex NSIP given its geographical scope across at least 9 separate sites requiring 31km of interconnecting cabling. Its size is the equivalent of Heathrow Airport but fragmented across 16 miles which I understand is rare even amongst NSIPs. This complexity is a great concern especially given the impact it will have on numerous communities. Circa 750 acres of land around the villages of Easton Maudit, Bozeat and Grendon in South Northamptonshire will be taken up by	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] , has identified a moderate adverse effect would occur as a result of the Scheme at Easton Maudit Conservation Area and a Neutral effect to Bozeat and Grendon (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). Mitigation in the form of the removal of solar panels from Fields FF13, FF14, FF16, FF22, FF27 and FF28 is proposed to retain a visual corridor between Grendon and Easton Maudit conservation areas. A visual corridor is



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			solar panels and Battery Energy Storage under this proposal (identified as Sites F and BESS). This will have a fundamental impact. Particularly on Easton Maudit which will be surrounded by panels on three sides – taking away agricultural land, destroying the setting of this historic village (which is home to numerous Grade II listed buildings and a Grade I listed church), having a disproportionate visual impact and impacting ancient footpaths and bridleways.	retained between heritage assets (including along PROW). Offsets (Field FF15, FF25 and FF26) and enhanced screening of existing hedgerow and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area. The breakdown of the agricultural land affected by the Scheme is set out in Chapter 20: Agricultural Circumstances [APP-057]. This land will be temporarily used for the purposes of accommodating Solar PV Development and associated infrastructure. Decommissioning of the Scheme will allow a return of arable management of the land.
SBMP-004	Other Environmental Matters	BESS Fire Safety	The 500MW BESS is proposed to be located on land adjoining the Grendon substation which is no more than a mile from the residents of Grendon. In the event of a battery fire residents will be at risk from toxic fumes – being told by the applicant that villagers would simply be “evacuated” is of no comfort. Battery fires release toxic gases such as Hydrogen Fluoride and highly flammable gases including Hydrogen, Methane, Ethylene and Carbon Monoxide. These in turn may cause	The Applicant does not envisage any credible BESS fire event that would require the evacuation of any local residents. The OBSSMP Revision A [EX1/GH7.7_A] provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. The purpose of this OBSSMP is to identify how the Applicant will use good industry practice to both prevent and reduce risk to life, property, and the environment from a BESS failure event.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			further explosions or fires upon ignition. According to fire safety consultants and fire officers, the likelihood of thermal runaway occurring is very high. Thermal runaway is uncontrollable except by vast water cooling – the water used is then toxic/polluted. All of these concerns are amplified given the scale of this BESS. We currently are relying only on guidance around BESS rather than a statutory framework. This land in question is also one that – despite the applicant's claims to the contrary, is a flood risk – indeed it flooded last Autumn 2024 and is seeing more regular flooding events. Furthermore, the proximity of this to the RAMSAR (wetland site designated to be of international importance) and SSSI sites along the Nene valley is very concerning and could be catastrophic. There would be ecological implications too of this development particularly affecting ground nesting birds. The application has also failed to consider the cumulative impact of BESS in the Grendon area, with a 49.9 MW facility that went live two years ago and a further 49.9 MW	ES Appendix 16.2: BESS Fire Emissions Modelling Report [APP-167] considers all sensitive receptors within a 1km radius of the BESS areas and finds that there are no significant fire emission impacts on local residential properties. The OBSSMP Revision A [EX1/GH7.7_A] has been drafted to ensure that there are no significant impacts from a BESS fire to site operatives, first responders, or the local community. This is secured in Schedule 2, Requirement 6 of the Draft DCO Revision A [EX1/GH3.1_A]. The Applicant notes the concerns raised in respect of flooding. The Environment Agency Flood Map for Planning identifies land in the vicinity of the proposed BESS as Flood Zone 3. However, a site-specific assessment has been undertaken, as reported in the FRADS Report [EX1/GH6.3.10.1_A] and the FRADS Annex J: Green Hill BESS [APP-108]. Detailed hydraulic modelling of the Grendon Brook confirms that the proposed BESS compound lies outside the modelled fluvial flood extent for the 1 in 100 year plus climate change event. The site is therefore not within the functional



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			BESS facility that has received planning consent. This BESS included would mean nearly 600 MW close to the village setting, the Nene waterways and in a flood zone which is inappropriate and disproportionate.	floodplain, will not displace flood storage, and will not increase risk to third parties. This conclusion is supported by consultation with local landowners, who confirmed that the BESS land did not flood during the Autumn 2024 event when wider areas of the Grendon valley experienced flooding. This aligns with the model findings and provides additional assurance that the BESS location is appropriate and resilient to flood risk. Pollution risks are addressed, with appropriate mitigation measures detailed, in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. The OCEMP Revision A [EX1/GH7.1_A] and OEPMS Revision A [EX1/GH7.5_A]. In terms of disturbance, the Order Limits are 15m from the SPA at the point of connection with the Grendon substation; here impacts are only possible during a brief period of construction. The actual BESS compounds are sited at least 350m from the SPA, and south of the existing Grendon substation. As detailed in the HRA Revision A [EX1/7.21_A], the risk of visual and noise disturbance to species within the SPA is curtailed by the presence of existing tall hedgerows and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				treelines between the Site and the SPA, and the sunken nature of the gravel pits. Direct impacts on nesting birds and disturbance of species which receive protection under Schedule 1 of the Wildlife & Countryside Act 1981 (including bittern) will be avoided, with mitigation measures detailed in the OEPMS Revision A [EX1/GH7.5_A]. Potential effects on the River Nene and associated designated sites have been assessed in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] and the HRA Revision A [EX1/GH7.21_A], which confirm that no adverse effects on the integrity of the Nene Valley SPA/SSSI/Ramsar. Please refer to ES Chapter 25: Cumulative Effects and Effects Interactions [APP-062] for cumulative impact assessment with the proposed BESS site in the Grendon area; the existing facility forms part of the baseline environment considered within relevant ES chapters.
SBMP-005	Consent Order	Scheme duration Decommissioning	The proposal that this scheme will last for 60 years is well beyond the industry standard for sites of this kind (typically between 20-30 years), which unduly restricts the use of the land as the climate continues to change. An agility may be required to	The proposed maximum 60-year operational period is not uncommon, several consented solar DCO projects provide for the same timescales including the Mallard Pass Solar Farm; Cottam Solar Project; West Burton Solar Project; Gate Burton Energy Park; and Tillbridge



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			reflect national priorities for land use which would be denied. There has been insufficient discussion around the applicant's plan to utilise compulsory purchase powers for wider swaths of this development and this should be addressed for transparency at the outset. The DCO outlines a decommissioning phase but not a means by which the funding for decommissioning will be guaranteed. It is common for ownership to change over the lifespan of projects like this - indeed Macquarie has acquired a 100% stake in Island Green Power this year which changes control mechanisms. It is therefore essential that financial provision for decommissioning is guaranteed regardless of any changes in ownership and if the assets of the final owner are insufficient to cover the costs. There is also no plan about how the panels might be removed or recycled. There is no consideration in the proposals of the impacts of repowering which is expected to take place at least twice during the lifetime of the scheme. Given the likelihood of advances in technology, it should be	Solar Project. It is noted that EN-3 Para 2.10.65 states that <i>"An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation"</i> and does not impose or suggest a year limit is required. If granted, the consent would not place an undue constraint on the use of land in terms of responding to the impacts of a changing climate. As noted in NPS EN-1, paragraphs 3.2.6 to 3.2.8, the urgent need for low carbon energy generation to support the transition to net zero emissions is so great that such projects are classified as Critical National Priority infrastructure and substantial weight must be given to the need for these projects. The low carbon electricity generated by the Scheme will support the net zero transition and help to tackle the effects of climate change. The OOEMP Revision A [EX1/GH7.2_A] contains a number of measures to ensure that any impacts as a result of climate change during the operational life of the Scheme are mitigated. Island Green Power, the Applicant's parent company, always seeks to enter into voluntary agreements with landowners where possible. As such, Option Agreements have been entered



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			assumed that repowering will be more akin to decommissioning followed by reconstruction than a simple panel exchange.	into with the landowners to lease the land required for the solar panels. Taking a lease means that the freehold ownership remains with the landowner. At the end of the operational life of the Scheme, the solar panels will be removed, the land will be restored and the lease will end. The landowner will then be able to use the land for agricultural purposes. Voluntary agreements for cable route easements are being negotiated. However, as is typical for NSIP projects, it is necessary for the Applicant to seek compulsory acquisition powers in the DCO so as to protect against a scenario whereby contracts are not adhered to or are otherwise set aside, for example: (i) freeholder owners of the land (where agreement has been reached) do not grant a lease of the land in accordance with the terms of the completed option agreements; or (ii) the contracting party dies, is subject to divorce proceedings, or is declared insolvent. In those circumstances, it would be in the public interest for the Scheme to proceed and the interests in question effectively converted into a claim for compensation. The Applicant also needs powers to suspend rights and override easements and other rights in the land to the extent that they would conflict with the Scheme.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				In respect of decommissioning, Requirement 21 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. The Applicant notes that there is no policy requirement for a decommissioning fund to be imposed and paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments. The Applicant considers that Requirement 21 complies with paragraphs 2.10.146 to 2.10.148 of NPS EN-3. The Secretary of State has considered this point in previous decisions for solar projects under the Planning Act 2008 and determined that imposing a decommissioning fund requirement is not necessary.² This is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose

² For example, see paragraphs 4.44 and 4.45 of the Secretary of State's Decision Letter for the Oaklands Farm Solar Park



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed. Panel recycling is set out in ES Chapter 24 Other Environmental Matters [APP-061], OCEMP Revision A [EX1/GH7.1_A], OOEMP Revision A [EX1/GH7.2_A] and ODS Revision A [EX1/GH7.3_A] commit to waste control measures including panel recycling at all stages of the Scheme's lifespan. Further details will be provided in the final operational environmental management plan and decommissioning statement as secured in Schedule 2, Requirements 14 and 21 respectively of the Draft DCO Revision A [EX1/GH3.1_A]. The ES Chapter 4 Scheme Description Revision A [EX1/GH6.2.4_A] sets out the assumption in section 4.6 that panels will be replaced once during the 60-year operational period and BESS and inverters up to five times, this has been considered within all topic chapters within the Environmental Statement. Technological advances have been considered and the Applicant concludes that no intrusive ground works will be required to replace Solar PV Panels or BESS.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SBMP-006	Public Consultation	Public consultation	The public consultation process was poorly advertised and had limited reach, with only four in-person events. There has also been little engagement on social media. Households in the affected villages have not been alerted to the DCO submission and the 14 August registration deadline to comment.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. GH5.1 Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Section 4 of GH5.1 Consultation Report Revision A [EX1/GH5.1_A] describes the Applicant's approach to non-statutory consultation, including early engagement meetings and Early Engagement Workshops where community groups, local council and parishes were invited to share their insights on early design ideas. Section 7 and 8 of GH5.1 Consultation Report Revision A [EX1/GH5.1_A] describe how the Applicant undertook a six-week statutory consultation on the Scheme, during which the Applicant presented the consultees with a Preliminary Environmental Information Report (PEIR). A non-technical summary was published to accompany the PEIR, and a consultation brochure was published to help consultees understand the proposals and the potential significant effects of the Scheme.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Before carrying out this statutory consultation, the Applicant consulted with the host local authorities about the strategy for consultation, with the feedback provided being considered and incorporated into the final CR Appendix 5.5: Statement of Community Consultation [APP-028]. The statutory consultation was carried out in accordance with the SoCC. During the statutory consultation, the Applicant held four in-person exhibition events and three webinars to present the Scheme and directly respond to queries from consultees. Section 10 of GH5.1 Consultation Report Revision A [EX1/GH5.1_A] describes the significant volume of responses received from Section 42 consultation and Section 47 consultation, including the issues raised and how these were considered by the Applicant. The Applicant notes Adequacy of Consultation Responses [AoC 001 – AoC- 015] where local authority consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out.
SBMP-007	Community Benefits	Community Benefits	There is a lack of any mention of community benefits. As with decommissioning, any proposal for community benefit payments needs to be structured such that it cannot be lost with a change of ownership. There is also no promise of any reduced bills as a result of this development.	The Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of the Planning Statement [APP-559]). This fund will be available for important causes in the local area. During the development of the proposals for Green Hill Solar Farm, we have consulted on community benefits and, based on feedback, will determine how best to distribute funding. The Scheme will also generate business rates that are paid to the local authority. No further details were given as a part of the Application because it will not be taken into account in the planning balance. The Applicant notes that the National Policy Statement for Renewable Energy Infrastructure (EN-3) which provides at paragraph 1.1.4: "More low-cost renewables on the system will reduce household electricity bills and help to increase security of supply through domestic energy production." This is reflected in the Statement of Need [APP-556] which sets out that large-scale solar power decarbonises the electricity system and lowers the market price of electricity by generating power so that expensive and more carbon intensive



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				forms of generation do not need to generate as much. In doing so, solar power delivers national decarbonisation benefits and supports consumer affordability aims, to the benefit of electricity consumers.
SBMP-008	Transport and Access	Increased HGV traffic	The increased HGV traffic on the narrow village roads and through residential streets in villages will cause significant disturbance and disruption to residents, particularly as some areas will take up to 24 months to complete.	The route choice for HGVs has sought to avoid the most sensitive routes and has been established through consultation with the highway authorities. An assessment of construction traffic and consideration of effects is provided in the ES Chapter 13 Transport and Access [APP-050]. The OCTMP Revision A [EX1/GH7.9_A] provides a framework for the management of construction vehicle movements to and from the Scheme. It will ensure that the effects of the construction phase are minimised. The OCTMP sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. The detailed CTMP, to be approved by the relevant planning authority, is secured in Schedule 2, Requirement 15 of the Draft DCO Revision A [EX1/GH3.1_A].
SBMP-009	Community Benefit	New employment opportunities	There is minimal evidence that the site will provide for new local jobs, either during construction or after,	The assessment of likely changes to employment, both positive and negative, is set out in ES Chapter 17: Socio-



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			with jobs potentially lost as a result of the land no longer being used for agricultural purposes and leisure businesses (i.e. equestrian businesses) that rely on the rural nature of the area.	Economics, Tourism and Recreation [APP-054]. The assessment therein estimates construction will create a gross 464 FTE jobs, an estimated 131 of which will come from within North and West Northamptonshire, Milton Keynes or Bedford Borough. During operation, a gross total of 15 FTE jobs are anticipated, approximately 4 of which will be filled by residents from the same area. Additional indirect and induced employment are anticipated from local supply chains, repairs and maintenance work, and from increased spending in the local area. The Scheme is estimated to cause a long-term loss of 12 agricultural jobs. Construction is anticipated to temporarily halt up to 29 FTE jobs dependent on leisure, tourism and visitor spending, while estimated to cause a long-term loss of 10 tourism-dependent jobs during its operational lifetime. Opportunities to improve local employment opportunities available through the Scheme, or to provide retraining support for those displaced by the Scheme are set out in the OSSCEP [APP-552], which is secured by



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Requirement 20 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] .
SBMP-010	Community Benefit	Recreational uses of the site	This area is frequently used by locals and others for leisure pursuits including cycling, walking and horse-riding, all of which will be curtailed by the construction of a solar farm. The change in the nature of the countryside will also deter these pursuits.	The Applicant confirms a full assessment of PRowWs, long-distance recreational routes, and the recreational use of the public highways is set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. This assesses the impact on the useability and user experience of each PRowW and long-distance recreational route likely to be affected by the Scheme individually. Significant adverse effects have been identified, during construction and peak periods of replacement of infrastructure only, to long-distance recreational routes due to their regional and national importance. As such, additional mitigation measures have been put in place to limit these effects, such as providing screening, and providing additional safety measures where PRowW users and construction traffic might interact. During construction, the routing of PRowWs within the Order Limits are to be protected and kept open wherever feasible and safe to do so. Any closures or diversions, such as for cable laying and landscape planting will be temporary in nature, with sufficient prior



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				notice given of closures, and diversion routes clearly signposted. These measures are set out in the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



4.2 Stuart Andrew MP

Table 4.2: [RR-1109](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SAMP-001	General	Status of Stuart Andrew MP constituents	I am writing to make a representation on behalf of my constituents concerning the proposed Green Hill Solar Farm. While I recognise the need for renewable energy and support the UK's transition to net zero, I have received numerous forms of feedback from constituents expressing a wide range of views. The overwhelming majority have highlighted that this particular development is wholly inappropriate due to several factors, which I have outlined below for consideration.	The Applicant notes this comment.
SAMP-002	Agriculture and Soils	Loss of High-Quality Agricultural Land	A major concern is the use of Best and Most Versatile (BMV) farmland (Grades 1, 2, and 3a). The National Planning Policy Framework (NPPF) advises that the use of BMV land, where possible, should be protected from development. Given the ongoing climate-related pressures on UK agriculture and the need for BMV land to sustain food production, this proposal directly conflicts with national policy.	Please refer to Applicants response to 'SBMP-002' which details the approach to site selection and the differing ALC Grading across the site.
SAMP-003	General	Inappropriate Scale and Location	The development spans approximately 1,200 hectares, an area comparable to Heathrow Airport, leading many to view it as the industrialisation of the Northamptonshire countryside.	The Scheme is classified as a Critical National Priority (CNP) project as defined in NPS EN-1 and therefore benefits from the strongest policy position in national planning policy. EN-1 sets out a



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			According to the Renewable Energy Planning Database (REPD) for April 2025, issued by the Department for Energy Security and Net Zero (DESNZ), 22 solar farms and 5 wind farms have either begun operation in Northamptonshire since 2015 or are currently under construction. In this same period, there has been an approximate 42% increase in the number of warehousing and storage units in the county. This information contributes significantly to the consensus that industrial development is accelerating in Northamptonshire. The proposal risks creating coalescence between villages, as the site selection appears to be driven more by ease of grid connection (to Grendon substation) than by environmental or strategic planning considerations. The scale and location of this proposed development would significantly alter the rural character of the area and encompass several communities entirely.	presumption in favour of energy related development. NPS EN-1 explains at paragraph 3.3.63 that: <i>“The urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible”</i> The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. NPS EN-3 recognises that the capacity of the grid network to accept the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal (paragraph 2.10.22), and that applicants may choose a site based on nearby available grid export capacity (paragraph 2.10.25). Details of the process are set out in Appendix 5.1: Site Selection Assessment Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				[EX1/GH6.3.5.1_A] Please also refer to Chapter 5: Alternatives and Design Evolution of the ES [APP-042] .
SAMP-004	Alternatives and Design Evolution	Alternatives	Given the increase in industrial developments, there is strong public support for placing solar panels on brownfield sites, warehouse rooftops, supermarket car parks, motorway verges, and new housing developments instead of BMV farmland. According to Ordnance Survey data, only about 5.5% of commercial buildings currently have solar panels. While not all buildings meet the necessary structural requirements or orientation for rooftop solar, the increase in warehousing in the county has led to greater public support for these alternatives. The proposals lack evidence showing that alternative brownfield, rooftop, or degraded sites were considered before targeting BMV farmland.	The Applicant's site selection process, including a search for suitable brownfield land, has been undertaken and presented as part of Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] of the Environmental Statement. Chapter 5 Alternatives and Design Evolution [APP-042] of the Environmental Statement explains in further detail the alternatives that were considered and the design evolution process for the Scheme. The Applicant also addresses brownfield and rooftop developments in Section 7.3 of the Statement of Need [APP-556], in particular the constraints and limitations of rooftop solar and the benefits of transmission grid connected solar. In addition, NPS EN-3, paragraph 2.10.10, notes that up to 70GW of solar deployment is expected by 2035, made up of a combination of rooftop and ground mounted solar such as the Scheme.
SAMP-005	Landscape and Visual Impact	Visual and Heritage Impacts	Concerns have been raised regarding visual blight, particularly from high points such as Sites A and A2 near Walgrave, as well as the impact on historic	The Applicant recognises that the Scheme will be visible and has included a detailed assessment of the visual impacts of the Scheme in ES Chapter 8



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Cultural Heritage Hydrology and Flood Risk		landmarks and surrounding conservation areas. Additionally, the work required for installation and decommissioning at the end of the site's lifespan could harm trees and hedgerows, impacting biodiversity and displacing natural wildlife habitats. The Battery Energy Storage System (BESS) near Grendon is located in a flood zone (Flood Zone 2), posing potential hazards to health and the environment. Many objections also cite potential harm to historic crash sites, including a protected WWII air crash location near Mears Ashby, which is covered by the Protection of Military Remains Act. There are calls to preserve this area intact due to the potential presence of unexploded ordnance and human remains.	Landscape and Visual Impact Assessment (LVIA) [APP-045]. The LVIA process considers adverse effects and specific measures have been put forward where practicable. These measures also consider effects to trees and hedgerows and ecology, which are considered in ES Chapter 19 Arboriculture [APP-056] and ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. The measures take into account the potential landscape and visual effects identified at an early stage through the iterative design process and include retention and reinforcement of existing vegetation, new planting along the margins of the solar panels to assist with their integration in the immediate context, new planting within the Sites to provide a strong landscape framework and support habitat connectivity, new planting to screen the panels in their wider landscape context, and new planting to bolster the overall landscape character context of the Sites. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register Revision A [EX1/GH6.2.27_A]. Please refer to response 'SBMP-004' in regard to concerns around the locality of the BESS and risk of flooding. ES Volume 1, Chapter 12: Cultural Heritage [APP-049], supported by Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120], has not identified any direct impacts to listed buildings. Identified impacts to listed buildings would be indirect and related to elements of their setting that contribute to their significance (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). With regards to solar associated infrastructure within Sites A and A2, mitigation in the form of removal of solar panels from Fields AF19 and AF21 and offset of panels in Fields AF20 and AF22. Enhanced screening of existing hedgerows of fields has been proposed. All other designated assets within the area around Site A and A2 were scoped out of assessment, as agreed with Historic England and the local planning authority, see Appendix 1 of Volume 3,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Appendix 12.1: Heritage Statement [APP-110 to APP-120]. In respect of the historic WWII crash sites, the Northamptonshire HER records the location of these within Fields EF9 and EF26 within the Scheme. No development is proposed within the Fields EF9 and EF26 where WW2 crash sites are recorded within Site E. The Applicant is therefore confident that there is no potential for impacts to these historic crash sites. The Applicant has contacted the Joint Casualty and Compassionate Centre (JCCC), the body responsible for licencing under the Protection of Military Remains Act 1986, to confirm this position.
SAMP-006	Community Benefit	Disruption to Local Access and Recreation	Longstanding community walking routes, such as Newland Road and Green Lane (designated a Quiet Lane), as well as public rights of way (PRoWs), are at risk of being lost or degraded due to the development, despite heavy usage for recreation. Many residents feel that their cultural and community values are being overlooked.	The importance of Newland Road as a 'Quiet Lane' has been recognised in ES Chapter 13: Transport and Access [APP-050]. The related OCTMP Revision A [EX1/GH7.9_A] and OOTMP Revision A [EX1/GH7.25_A] stipulate that no HGV traffic during construction, or operational traffic is to use Newland Road to ensure no significant effect on recreational users occurs. This is secured through Requirements 15 and 16 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Applicant was made aware of the 'green lane' in Green Hill A during early



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				consultation and has sought to include enhancement to it as part of the Scheme. The green lane will be protected during construction as a PRoW and will be enhanced during the Scheme's operational lifetime by extending its north end to loop back to the north end of Newland Lane, providing a new circular low-traffic route for pedestrians and equestrian users. This is set out in the OPROWPPMP Revision A [EX1/GH7.10_A] and is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Green Hill A also provides for the creation of a permissive pedestrian link from Newland Road to Broughton Road near the village of Old and public footpath NN DF 4. The assessment in ES Chapter 18: Human Health [APP-055] assesses the physical and mental health and wellbeing and social impacts of the development, such as in consideration of "<i>community identity, culture, resilience and influence</i>" and access to "<i>open space, leisure and play</i>". The assessment finds that whilst there will be some level of changes in perception of rurality in the surroundings, there is not anticipated to be any significant adverse effects to personal or community wellbeing.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SAMP-007	General	Project Lifespan and Decommissioning	There is scepticism regarding the claimed 60-year lifespan of the project, with concerns that it may be abandoned early due to technological obsolescence. Additionally, questions have been raised about the lifespan of the solar panels used and potential replacements that may be required even before the project's end, which calls into question the overall green credentials of the project. Calls have been made for a financial bond from the developer (Macquarie Group) to ensure that the land will be fully restored to agricultural use. There is concern that the land could become permanently degraded and reclassified as brownfield land, ultimately leading to its repurposing for housing rather than agricultural use.	Under Section 4.6 of Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A], replacement activities are further detailed. The programme of replacement has been included within assessments in the ES and represents a worst case where the panels are replaced once during the lifetime of the Scheme and the batteries replaced up to five times. In respect of decommissioning, Requirement 21 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. The Applicant notes that there is no policy requirement for a decommissioning fund to be imposed and paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments. The Applicant considers that Requirement 21 complies with paragraphs 2.10.146 to 2.10.148 of NPS EN-3.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Secretary of State has considered this point in previous decisions for solar projects under the Planning Act 2008 and determined that imposing a decommissioning fund requirement is not necessary.³ This is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed.
SAMP-008	Transport and Access	Construction Traffic	The anticipated volume of heavy goods vehicles (HGVs) during construction is considered incompatible with narrow village roads, posing safety risks as well as noise and congestion issues. Many residents are concerned about the overall impact of construction on their daily lives, the local environment and existing highway infrastructure.	The approach towards route choice and avoiding the most sensitive routes has been undertaken with consultation of the highway authorities. An assessment of road traffic effects during the construction phase upon users of the highway network has been undertaken as part of ES Chapter 13 Transport and Access [APP-050]. Please refer to response 'SBMP-008' above on the implementation of the Construction Transport Management Plan.

³ For example, see paragraphs 4.44 and 4.45 of the Secretary of State's Decision Letter for the Oaklands Farm Solar Park



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SAMP-009	Consent Order	Economic and Ownership Concerns	The developer's ownership by Macquarie Group, an Australian asset management firm, raises concerns that profit motives may take precedence over community and environmental priorities. Many residents worry that energy generated from the project will be sold to the highest bidder, rather than benefiting local residents or the UK grid. There is a growing sentiment that the minimal local economic return and lack of community benefits are unjustifiable, especially given the scale of disruption caused.	Section 7.2 of the Statement of Need [APP-556] explains that the Scheme will connect to the National Electricity Transmission System (NETS) at Grendon. By connecting to the NETS, generation from the Scheme will be transmitted to both local consumers and across the country where it is required. This is a key benefit of the Scheme and helps the UK's electricity system operate efficiently which is a benefit to all consumers, including local consumers, who, through their energy bills, pay for the operational costs of the UK's electricity networks. Section 10.2 of the Statement of Need explains how low marginal cost British electricity generators such as the Scheme reduce the wholesale price of electricity, which is of benefit to all GB consumers. The Applicant has also committed to a community benefits package and to ensuring that employment and supply chain opportunities go to local contractors and employees wherever practicable. The Requirements in Schedule 2 to the draft DCO will control the construction, commissioning, operation and decommissioning of the Scheme. The Requirements secure a range of detailed plans to manage and mitigate



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				environmental effects, provide planting enhancements and biodiversity net gain. A breach of any requirement in the DCO would constitute a criminal offence. This demonstrates how community and environmental priorities will be fundamental to the Scheme throughout its lifetime.



4.3 CPRE Northamptonshire

Table 4.3: [RR-1221](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-001	General	Status of CPRE Northamptonshire	CPRE Northamptonshire presents our mission as “Working for a beautiful and thriving Northamptonshire”. We recognise that development must take place but seek to ensure that the scale and location of development are appropriate. We are very concerned about climate change but we nevertheless seek to ensure that renewable energy schemes are sited in appropriate locations. We do not wish to see what we value destroyed in the process of trying to protect it.	The Applicant notes this comment.
CPRE-002	General	The Scheme	The primary factors that we take into consideration when assessing solar farm applications are: • The visibility of the scheme within the wider landscape • Whether it harms a valued or sensitive landscape • Whether it harms views from settlements and for users of Public Rights of Way • Whether it harms the setting of settlements • The detrimental impact on food production	The Applicant notes this comment. The Environmental Statement, particularly ES Chapter 8: Landscape and Visual [APP-045] , ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and ES Chapter 20: Agricultural Circumstances [APP-057] , are relevant to the factors listed.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-003	Socio-economics	BESS	We do not currently have a formal policy on battery storage but we consider the same primary factors with the additional considerations of: - the safety of rural communities and the environment - the impact upon rural communities. This is not an exhaustive list because we will address all issues that we feel impact upon the countryside and rural communities.	The Applicant confirms that an assessment of the health impacts to communities has been undertaken in ES Chapter 18: Human Health [APP-055] and finds no significant adverse effects subject to implementation of mitigation. Refer to response SBMP-004 on BESS Fire Emissions Modelling. The safety impacts on communities from BESS fires and explosions have been assessed in ES Chapter 23: Major Accidents and Disasters [APP-060], which finds no significant adverse effects subject to implementation of mitigation. Mitigation measures to protect the physical and environmental health and wellbeing of communities with respect to BESS (such as from fires, air and water pollution) are set out in the OBSSMP Revision A [EX1/GH7.7_A] and secured by Requirement 6 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. As part of the detailed BSSMP to be prepared prior to construction of the BESS, the Applicant will take into account the latest good practices for battery system failure prevention and detection, consequence modelling, risk analysis, and emergency response planning, as guidance continues to develop in the UK and around the world. The relevant



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				planning authority must also consult with Northamptonshire Fire and Rescue Service and the Environment Agency before approving the detailed BSSMP, ensuring that the approved plan will be appropriate.
CPRE-004	General	Status of CPRE Northamptonshire	We raised a number of concerns about the contents and adequacy of PEIR during consultation and we will assess how the DCO responds to these. Due to the vast amount of documentation that has to be individually downloaded we have not yet been able to full assess the scheme and so we will submit a detailed response to the project when we have been able to do so. This is therefore a preliminary response that we will reassess and build upon as we gain a deeper understanding of the scheme. We therefore reserve the right to address additional matters that are pertinent to the scheme. Our initial impression is that the scheme is unacceptably harmful when considered under every one of our criteria.	The Applicant notes this comment.



4.4 Forestry Commission

Table 4.4: [RR-1225](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
FC-001	General	Status of the Forestry Commission	Thank you for consulting the Forestry Commission on this project. As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.	The Applicant notes this comment.
FC-002	Arboriculture	The Site	There are no Ancient woodlands within the proposed order area, however there are four identified adjacent to the site and the cable route area: Sywell Wood (PAWS), Horn Wood (ASNW), Barslay Spinney (ASNW), Three Shire Wood (ASNW) and Nun Wood (ASNW) We note that 58 veteran trees and 1 ancient tree have also been identified.	The Applicant notes this comment and details on ancient woodlands within proximity of the site are detailed in ES Chapter 3: The Development Site Revision A [EX1/GH6.2.3_A] . Further details on the assessment of trees are outlined in ES Chapter 19: Arboriculture [APP-056] .
FC-003	Arboriculture	Buffer zones	The Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root	The Applicant notes this comment. A 30m buffer for ancient woodland has been applied in the OEPMS Revision A [EX1/GH7.5_A] to mitigate ecological effects. As no ancient



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction. We note that while the arboricultural reports state that a minimum 15m will be afforded to the ancient woodlands, although the 'Outline Ecological Protection and Mitigation Strategy' allows a 30m buffer zone for all ancient woodlands and a 20m buffer for all other woodland. It is our opinion that a 30m buffer will provide a suitable mitigation for any potential affects to the ancient woodlands, assuming that all other protection measures identified including dust minimization, directional lighting to avoid illuminating the woodlands, use of construction exclusion zones and pollution control measures are utilized.	or veteran trees were found on the edges of the ancient woodlands adjacent to the Sites, a 15m ancient woodland buffer is used in the arboricultural assessment to mitigate potential impacts to tree canopies and roots. The following specific embedded mitigation measures for construction work near ancient woodlands is secured to avoid dust/sediment impacts and root/canopy impacts to trees in ancient woodland: • Dust and sediment controls will be in place for relevant works near ancient woodlands along the Cable Route Corridor and near the Sites - secured in the OCTMP Revision A [EX1/GH7.9_A]; • Construction traffic will not use access tracks within the Veteran Tree/Ancient Woodland Buffer Zones in order to avoid the pruning of veteran trees/trees within ancient woodland to achieve clearance heights for tall vehicles or machinery. Instead, construction traffic will be routed outside of Veteran Tree/Ancient Woodland Buffer Zones - secured in OCEMP Revision A [EX1/GH7.1_A]; and • Any access tracks (for use during operation/decommissioning) situated within Veteran Tree/Ancient Woodland Buffer Zones will be constructed using a



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				'no-dig' solution and all excavation within Veteran Tree/Ancient Woodland Buffer Zones will be avoided - secured in OCEMP Revision A [EX1/GH7.1_A]. Other general mitigation for trees is included in section 19.7 of ES Chapter 19 Arboriculture [APP-056].
FC-004	Arboriculture	Ancient and Veteran Trees	We note that access tracks adjacent to both Three Shires Wood and Horn Wood will be within the buffer zone and may require limited pruning, although these access tracks will not be used for construction traffic. Were construction traffic to carry heavy equipment on these access tracks, there is a higher potential for deterioration of the ancient woodlands to occur as a result of root compaction. For complete avoidance of potential issues, it may be preferable to move these tracks out of the buffer zone then also removing any potential deterioration were pruning to be required.	Commitment N010170 – ARB – 21 in the ES Chapter 27 Commitments Register [APP-064] ensures that construction traffic will not use access tracks within Ancient Woodland Buffer Zones in order to avoid potential tree pruning or root damage to trees on the edge of Three Shires Wood and Horn Wood.
FC-005	Arboriculture	Ancient and Veteran Trees	It is noted that no ancient and veteran trees are planned to be removed, however required tree removals appear not to have been fully confirmed at this stage. The arboricultural information does that	Whilst the arboricultural impacts included in the Arboricultural Impact Assessment are based on the 'maximum design scenario', the Applicant has, regardless of detailed design, committed to avoiding the removal of, or root/canopy impacts to, veteran trees along



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			that some veteran trees may be affected. Maintenance and pruning of ancient and veteran trees would likely to be beneficial. However, in our view, habitat degradation may occur if construction occurs within the RPA's of ancient or veteran trees, particularly if affected by access roads which may potentially carry heavy equipment. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage. The RPA should be avoided and protected, especially in the cases where there is likely to be frequent construction traffic where roots are particularly vulnerable to compaction. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.	the Cable Corridor. Commitment EN010170-ARB-03 in ES Chapter 27 Commitments Register [APP-064] confirms that along the Cable Corridor, veteran trees will be micro-sited around or Horizontal Directional Drilling will be used underneath them. Within the Cable Corridor and the Sites, the Applicant has committed to supervision from an Arboricultural Clerk of Works (ACoW) during construction to ensure tree protection measures (such as tree protection fencing and ground protection) are used appropriately to safeguard retained veteran trees. This is committed to in EN010170-ARB-04 of ES Chapter 27 Commitments Register [APP-064].
FC-006	Arboriculture	Woodland creation and planting	The application includes 14.4ha of woodland creation plus individual trees. We note planting areas also appear to improve habitat	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			connectivity, which will benefit all the woodlands affected by the site.	
FC-007	Arboriculture Landscape and Visual	Planting Management	Active management of woodlands, especially ancient woodlands, is essential for a host of reasons but crucially to create and maintain the valuable biodiversity element of these habitats. This diversity leads to greater resilience of the woodland ecosystem. The diversity and benefit of woodlands will be lost over time if they are neglected. These interventions are also crucial in the face of climate change where active management is needed to help woodlands adapt. The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, especially in areas where there are ancient woodlands. Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, including the removal of any invasive species	As all ancient woodlands are outside of the Order Limits, no active management to these woods are proposed. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A]. Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the ES Chapter 27 Commitments Register [APP-064].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			currently present. Perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.	
FC-008	Arboriculture Ecology and Biodiversity	Woodland management and control of deer	As a large scale project, this proposal has scope to exclude significant amounts of farmland from the deer range in this area. Species affected will be red, roe and muntjac which are widespread. This is likely to increase herbivore browsing and grazing to other areas in close proximity to the site. Impacts are likely to increase in surrounding woodlands and the wider landscape, where ancient woodlands, hedgerows and stewardship schemes are likely to be impacted upon. Large scale fencing will change how deer move through the landscape, which may also increase the numbers of deer crossing local roads and therefore may also increase the numbers of deer vehicle collisions in the area. An assessment of any increase of this risk should be undertaken, if culls occur prior to development, the risks should reduce.	A range of deer species are likely to roam widely in the local landscape, with several species recorded ad-hoc during baseline surveys, including Chinese water deer, roe and Muntjac. Operationally, all existing and newly created woodland habitats will remain accessible to deer, with additional wide undeveloped buffer zones provided between boundary habitats and security fencing. These buffer zones will permit deer to roam within the landscape, and offer suitable foraging habitat. It is also possible that some deer species will be able to access and utilise the interior of the arrays during operation; deer have been recorded within operational solar farms during ecological monitoring work conducted by Clarkson & Woods Ltd. Though deer will be displaced from the Sites temporarily during construction, they would not be considered likely to spread beyond their current range as a result of the Scheme, with the Scheme retaining large extents of suitable foraging and sheltering habitat and ensuring connectivity with the wider landscape is maintained.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				No deer species receive special legal protection or are considered priority species of conservation concern. Deer are therefore not considered an Important Ecological Feature (IEF). Further discussion of the potential impacts of the Scheme on deer is provided in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] .
FC-009	Arboriculture Ecology and Biodiversity	Recommendations	To meet planning policy and Government guidance, we would recommend: • Robust adherence to the Standing Advice, especially regarding buffer zones, to rule out loss or deterioration to the ancient woodlands or veteran trees. • Detailed plans for protection measures for the woodlands during the construction. • Maintain and where possible improve woodland condition, especially ancient woodland. • Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological	The Applicant notes this comment. A 30m buffer for ancient woodland has been applied in the OEPMS Revision A [EX1/GH7.5_A] to mitigate ecological effects. As no ancient or veteran trees were found on the edges of the ancient woodlands adjacent to the Sites, a 15m ancient woodland buffer is used in the arboricultural assessment to mitigate potential arboricultural impacts to tree canopies and roots in accordance with Standing Advice. Buffer zones for veteran trees have also been applied and considered in the arboricultural assessment for veteran trees. The protection for woodlands during construction is provided by mitigation measures within ES Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171] including tree protection fencing, ground protection and an Arboricultural Clerk of Works. A total of 14.4ha of woodland creation is proposed across the Scheme, comprising a



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			enhancements/creation of woodland edges. • Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats across the site, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area. • Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050. • A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.	mix of native woodland copses/shelter belts and native tree and scrub planting for instant screening. These new woodland areas can provide ecological 'stepping stones' between larger areas of woodland and ancient woodland in the local landscape. Further information is provided in the OLEMP Revision A [EX1/GH7.4_A]. A revised version of the OLEMP Revision A [EX1/GH7.4_A] will be submitted by the Applicant which includes further prescriptions on woodland management.



5 The Applicant's Responses to Parish Councils, Parish Meetings, or Neighbourhood Community Groups

5.1 Bozeat Parish Council

Table 5.5: [RR-1216](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BoPC-001	Agriculture and Soils Landscape and Visual Transport Ecology and Biodiversity	Loss of productive farmland Visual impacts Construction traffic Ecological impacts	Loss of productive farmland; visual impact of a large solar farm; disturbance caused by construction traffic travelling through our village; negative impact on wildlife.	The Applicant notes this comment. The ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] recognises the shift from open agricultural farmland to large scale solar infrastructure stating that the character of the Sites themselves and their immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme leading to Significant adverse effects on local landscape character. However, this needs to be considered against the ability of the receiving landscape to accommodate the low lying infrastructure. Within the study area there would be limited appreciation of the array or associated infrastructure, with the integrity of the character of the wider receiving landscape preserved, along with landscape features within retained and enhanced. The ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] assess views of the array from residential properties within the settlement of Bozeat, recognising that there would be potential for glimpsed views of panels on higher ground in FF25 from properties on the high ground on the western edge of the village. However, given the juxtaposition of the Scheme from the settlement there would be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				limited intervisibility to and from the village, with the village separated from Site F by trees and vegetation associated with the A509 road corridor. Given this separation and overall limited intervisibility the LVIA does not identify any Significant adverse effects on views from private residential properties within Bozeat. Please refer to Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] for details on Visual Assessment. The Scheme results in temporary loss of productive farmland during construction as the land will be still in agricultural use as grassland for grazing. In addition, cessation of cultivation and conversion of land currently under arable use to grassland will be a long-term fallow and will remove disturbance on the soils and may result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term. The Applicant confirms that the measures set out in ODS Revision A [EX1/GH7.3_A] together with OSMP [APP-550] (as secured by Requirements 21 and 19 of Schedule 2 to Draft DCO Revision A [EX1/GH3.1_A] respectively) require agricultural land to be restored to the standard of the existing baseline ALC Grade. An assessment of the effects of construction traffic is set out in ES Chapter 13 Transport and Access [APP-050]. Construction traffic will be limited to a proportion of construction movements accessing



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Green Hill F which cannot utilise the direct access from the A505. Table 6.4 of the outlines the forecast number of peak daily movements on London Road that may pass Bozeat. The forecast suggests 58 car or van movements 6 shuttle bus movements and 8 HGV movements across the day. An assessment of the likely significant impacts on wildlife is included in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A].



5.2 Clifton Reynes and Newton Blossomville Parish Council

Table 5.6: [RR-1218](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CRNBPC-001	Agriculture and Soils	Impact on agricultural land	The prime concerns of Clifton Reynes and Newton Blossomville Parish Council, with the Green Hill Solar Farm - Area G development proposals are: 1. The impact on prime agricultural land, and the effect on rural livelihoods in the area.	The disturbance of the land and soils during construction is temporary and minimal and the construction activities will be in compliance with the OCEMP Revision A [EX1/GH7.1_A] together with OSMP [APP-550] and ODS Revision A [EX1/GH7.3_A] (as secured by Requirements 13, 19 and 21 of Schedule 2 to Draft DCO Revision A [EX1/GH3.1_A] respectively) in the final soil management plan to protect soil resources and land during construction and decommissioning. Once the construction is complete, the soils and land of the disturbed areas will be restored to its previous functionality and use conditions, and the farmland will be under grassland with potential grazing. The conversion of arable land to grassland would be a long-term fallow and will remove disturbance on the soils and will result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term.
CRNBPC-002	Landscape and Visual Impacts	Visual Impacts Glint and Glare	2. The visual impact on this significantly large landscape area north of the Parish, including glint and	<u>Landscape</u> ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			glare, with the topography appearing to provide little mitigation.	amenity in detail, and acknowledges that locally prior to the establishment of the Embedded Mitigation, there would be an immediate change to the character of the Site and its immediate setting as it changes from an area of arable farmland to solar infrastructure. However, these effects would be limited to the Site itself and its immediate setting. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process within the environmental masterplan. This has involved setting out the key elements of constraint within parameter plans and adopting the mitigation hierarchy in accordance with GLVIA3. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments. <u>Glint & Glare</u> ES Chapter 15 Glint and Glare [APP-052] has considered the impact upon amenity at nearby residential dwellings in Section 5 to 6 of ES Appendix 15.5: Green Hill G Ground-Based Receptor Results [APP-159]. It concludes that a 'non-significant minor effect' has been classified at all modelled dwellings. The assessment considered receptors along Public Rights of Way (PRoW) and horse facilities. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors. As outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.21, the sensitivity of PRoW and horse facilities have been categorised as 'low', and the maximum magnitude of impact for PRoW and horse facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms.
CRNBPC-003	Consultation	Community Engagement	3. Considering the massive scale of the proposals, we are not convinced that meaningful effective community engagement has really occurred, across the wider North Bucks area.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Section 4 of Consultation Report Revision A [EX1/GH5.1_A] describes the Applicant's approach to non-statutory consultation, including early engagement meetings and Early Engagement Workshops where community groups, local council and parishes were invited to share their insights on early design ideas. Section 7 and 8 of Consultation Report Revision A [EX1/GH5.1_A] describe how the Applicant undertook a six-week statutory consultation on the Scheme, during which the Applicant presented the consultees with a preliminary environmental information report (PEIR). A non-technical summary was published to accompany the PEIR, and a consultation brochure was published to help consultees understand the proposals and the potential significant effects of the Scheme. During the statutory consultation, the Applicant held four in-person exhibition events and three webinars to present the Scheme and directly respond to queries from consultees. Section 10 of Consultation Report Revision A [EX1/GH5.1_A] describes the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				significant volume of responses received from Section 42 consultation and Section 47 consultation, including the issues raised and how these were considered by the Applicant. The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-015] where local authority consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out.
CRNBPC-004	Ecology and Biodiversity	Nature Conservation along the Three Shires Way	4. The impact on nature conservation, including safeguarding the overall biodiversity alongside the established Three Shires Way.	The value of the habitats for biodiversity within Green Hill G (mostly comprising large arable fields currently) will be significantly increased through the creation of grasslands within and outside the fencing of the solar arrays. The Scheme also includes woodland and hedgerow planting adjacent to Three Shires Way, which will serve to further enhance the value of the site for biodiversity. Additional details can be found in the OLEMP Revision A [EX1/GH7.4_A] and the ES Figure 4.20: Landscape and Ecology Mitigation Plan G [APP-219].
CRNBPC-005	Hydrology and Flood Risk	Flood Risk Management	5. A lack of detail on flood risk management for Lavendon, a village	The Applicant notes the concern regarding flood risk management for Lavendon. Flood



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			already experiencing regular flooding issues.	risk at Site G has been assessed in detail in ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and the supporting FRADS Annex I: Green Hill G [APP-107]. These confirm that the development footprint lies within Flood Zone 1, with only minor areas of surface water risk, and that runoff from the site will be restricted to greenfield rates with attenuation and exceedance routing provided within the Order Limits. The assessments demonstrate that the Scheme will not increase flood risk to Lavendon or elsewhere. Extensive work has been undertaken at Site G to confirm that there will be no off-site detriment, including review of catchment hydrology, Environment Agency datasets, topographic analysis, and sustainable drainage design in line with CIRIA C753: The SuDS Manual. As evidenced by Cook & McEwan (2013) and the BRE National Solar Centre (2014) Good Practice Guidance for Solar Farms, solar panel arrays do not materially increase runoff, as rainfall continues to infiltrate between and beneath rows with drip lines dispersed over vegetated ground. The principal hydrological risk arises from soil compaction during construction, which is mitigated through the OCEMP Revision A [EX1/GH7.1_A] and the OSMP [APP-550].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Flood risk management for Site G is therefore secured through embedded design and through Requirement 11 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] , ensuring the Scheme will not add to the existing flood issues in Lavendon.
CRNBPC-006	Transport and Access	Construction Traffic Management Plan	6. Noise, dust, and increased traffic on local minor roads during construction, particularly associated with the interconnecting infrastructure and battery farm works, and the need for a fully conditioned Construction Traffic Management Plan.	An assessment of construction traffic is provided in ES Chapter 13 Transport and Access [APP-050] and includes movements associated with the Cable Connection Corridor. The submission includes an OCTMP Revision A [EX1.GH7.9_A] which will be updated to reflect specific design details as the Scheme progresses. This is secured through Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
CRNBPC-007	Socio-economics	Public Rights of Way	7. The need for all Public Rights of Way (PRW), to remain open throughout the works.	During construction, the routing of PRoWs within the Order Limits are to be protected and kept open wherever feasible and safe to do so. Any closures or diversions, such as for cable laying and landscape planting will be temporary in nature, with sufficient prior notice given of closures, and diversion routes clearly signposted. These measures are set out in the OPROWPPMP Revision A [EX1.GH7.10_A] , which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CRNBPC-008	Community Benefit	Community Benefit	8. The proposals offer limited direct benefits to the community while imposing long-term burdens. As such there is little detail on Environmental / Landscaping Improvements, enhancement of PRW, or Community Benefit Funds.	The Scheme provides direct public benefit with regard to renewable energy production, landscaping enhancements, ecology and biodiversity enhancements, improvements to PRoW network connectivity, and economic benefits to communities. These are described throughout the Environmental Statement [APP-038 to APP-064] and secured through the relevant mitigation and management plans secured by requirement in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] . Please refer to the Applicant's response to 'SBMP-007' above.
CRNBPC-009	Community Benefit	Public Rights of Way	9. Additional PRW for the lifetime of the solar farm should also be considered.	Please refer to the Applicant's response to 'NNC-078' above.
CRNBPC-010	Ecology and Biodiversity	Mitigation to protect the environment	10. Whilst the NPPF encourages renewable energy, it also emphasizes the need to protect landscapes, biodiversity, agricultural land, and visual amenity, it is therefore critical that mitigation and enhancement measures including landscaping and BNG are fully Conditioned.	Please refer to the Applicant's response to 'NNC-008' which describes how mitigation, management and monitoring measures will be secured.
CRNBPC-011	Other Environmental Matters	Cumulative Effects	11. There is little consideration of the cumulative impact of the development alongside other existing solar areas in the Wellingborough area.	The cumulative effects are summarised in ES Chapter 25: Cumulative Effects and Effects Interactions [APP-062] , where other developments are considered, based on ES Appendix 25.2: Short List of Committed Developments [APP-189] , the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				content of which was agreed with local authorities. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme and the short list of committed developments. This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice on Cumulative Effects Assessment (September 2024). The mitigation measures set out across the ES therefore account for anticipated cumulative effects. The consideration of effect interactions follows the methodology outlined in ES Chapter 2: EIA Process and Methodology [APP-039].
CRNBPC-012	Ecology and Biodiversity	Landscape and Ecology Management Plan	12. A lack of detail on Long-term Management and Maintenance and the Landscape and Ecological Management, and how these are to be Conditioned.	Please refer to the Applicant's response to 'NNC-008' which describes how mitigation, management and monitoring measures will be secured.



5.3 Cogenhoe & Whiston Parish Council

Table 5.7: [RR-1219](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CWPC-001	Landscape and Visual Impact	Rural Character Food Security	1. Visual Impact and Landscape Character The proposed development will fundamentally alter the rural character of the landscape surrounding Cogenhoe. The scale of the solar farm, with rows of industrial solar panels and associated infrastructure, will dominate the natural countryside views enjoyed by residents, walkers, and visitors alike. Land usage for the proposal will go from food production to an industrial site, the area currently produces many crops which helps provide food security for the whole country. Cogenhoe is a village defined by its rural setting, and the development would undermine the visual amenity of the area, particularly for homes on the eastern edge of the village.	Cogenhoe is located approximately 5.2km north west of the nearest areas of the Scheme proposed for solar infrastructure (Fields FF17 of Site F) and therefore given that there would not be panels within the landscape immediately surrounding Cogenhoe the Applicant does not accept the claims that the Scheme would alter the rural character of the landscape surrounding the settlement. Additionally, given that there is no intervisibility of the proposals from within Cogenhoe or its surroundings, the Applicant does not agree that the Scheme would undermine the visual amenity of the area or homes on the eastern edge of the village. Please refer to the response to 'ScPC-002' below in relation to food security.
CWPC-002	Noise and Vibration Human Health	Noise and Disturbance during the Construction phase	2. Noise and Disturbance During Construction The construction phase is expected to bring months of noise, dust, and heavy vehicle traffic to local roads, including through or near Cogenhoe. This is especially concerning given the narrow, country roads that serve the area, which are not designed to accommodate	As detailed in the ES Chapter 14 Noise and Vibration [APP-051] , noise modelling has been completed which assesses the noise levels associated with construction. All impacts are deemed either negligible or low, with residual effects deemed not significant. Impacts from dust, noise, and HGV movements on human health and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			sustained use by large construction vehicles. The disruption would adversely affect daily life for residents, particularly families with young children, the elderly, and those who work from home	wellbeing have been assessed in ES Chapter 18: Human Health [APP-055] and find no significant adverse effects to human health in any location surrounding the Scheme. The assessment furthermore does not identify any population group that would be disproportionately affected by the Scheme's construction. This is subject to mitigation measures as set out in the OCEMP Revision A [EX1/GH7.1_A], which is secured by Requirement 13 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. This is furthermore confirmed in the Equality Impact Assessment [APP-564] that no group with protected characteristics are anticipated to be disproportionately impacted by the Scheme's construction with regard to noise and transport impacts. With specific respect to Cogenhoe and Whiston, general HGV construction traffic is to be routed to and from the A45 via Station Road (between Earls Barton and Grendon) to the cable route and Green Hill BESS site, avoiding Cogenhoe village. The route through Cogenhoe village is not proposed as an HGV route but may be used by some workers and is required to transport Abnormal



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Indivisible Load movements associated with the Green Hill BESS site. These traffic movements will be set out in the detailed Constriction Traffic Management Plan as secured by Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] .
CWPC-003	Transport and Access	Increased traffic and road safety	3. Increased Traffic and Road Safety Concerns The solar farm proposal will inevitably lead to increased traffic during both the construction and operational phases. Local roads such as Station Road and Brafield Road are already under strain, and further pressure will raise safety risks, especially around school drop-off times or pedestrian routes. The proposed route travels past our village school and village hall, both of which are already high traffic volume areas with much on street parking and many access points onto the road. There is then a very tight right turn onto Station Road which for the size of the proposed vehicles will be very difficult and that's without the existing large coaches that travel that route from the Chalfont Coach premises off Station Road. There is no indication that infrastructure improvements would accompany the development, leaving residents to bear the consequences.	An assessment of construction traffic is provided in ES Chapter 13: Transport and Access [APP-050]. Movements during the operational phase associated with maintenance will be low. The transport and access assessment has not identified any impacts which would render the proposed route unsuitable for these purposes The submission includes an OCTMP Revision A [EX1/GH7.9_A] to manage HGV movements. With specific respect to Cogenhoe and Whiston, general HGV construction traffic is to be routed to and from the A45 via Station Road (between Earls Barton and Grendon) to the cable route and Green Hill BESS site, avoiding Cogenhoe village. The route through Cogenhoe village is not proposed as an HGV route but may be used by some workers and is required to transport Abnormal Indivisible Load movements associated



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				with the Green Hill BESS site. This route has previously been used to transport abnormal loads associated with the Grendon Substation.
CWPC-004	Human Health	Impact of Mental Wellbeing	4. Impact on Mental Wellbeing and Community Identity The industrialisation of the countryside around Cogenhoe risks long-term impacts on residents' mental wellbeing. The loss of unspoiled green space, the imposition of an intrusive development, and the transformation of quiet surroundings into an energy production site could lead to a sense of loss and disconnection for many. The village's identity as a rural and tranquil community is at stake.	The assessment of community identity, culture, resilience and influence in ES Chapter 18: Human Health [APP-055] assesses the mental health and wellbeing and social impacts of the development, and finds that whilst there will be some level of changes in perception of rurality in the surroundings, there is not anticipated to be any significant adverse effects to community wellbeing. With specific respect to Cogenhoe, impacts from the Scheme are likely to be felt at a distance, or on approaches by road. The cable route and Green Hill BESS site are likely to be appreciated in the context of existing mineral extraction works by the River Nene and the existing National Grid substation at Grendon. The Scheme is therefore not anticipated to create a significant change to the rural character and cultural identity of the community.
CWPC-005	Community Benefit	Community Benefit and compensation	5. Lack of Community Benefit The proposal provides minimal direct benefit to Cogenhoe residents. The energy generated is not guaranteed to support local needs, and there is little	Please refer to the Applicant's response to 'CRNBPC-008' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			evidence of compensation, community investment, or support being offered in exchange for the significant disruption caused. Without a clear and proportionate community benefit, the proposal appears to prioritise commercial interests over local well-being.	
CWPC-006	Other Environmental Effects	Cumulative Effects	6. Cumulative Impact When considered in conjunction with other local developments (including the existing mineral extraction works which residents have felt the impact of for many years), the solar farm adds to a cumulative burden on the landscape, infrastructure, and community resilience. The planning authority must take this cumulative impact into account.	Please refer to the Applicant's response to 'CRNBPC-011' above.
CWPC-007	Alternatives and Design Evolution	Objection to size and location	In summary, while the pursuit of renewable energy is important, it must be in the right location, ie. on roof tops, it must not come at the cost of rural communities like Cogenhoe. The Green Hill Solar Farm is disproportionately large, visually intrusive, and offers little local benefit while causing tangible harm to residents' quality of life and a huge loss of agricultural land. This objection is based on the views of many residents of the village following a public meeting held to gather opinions and a majority vote	Please refer to the Applicant's response to 'SBMP-001' on site selection, and the Applicant's response to 'CWPC-001 to CRNBPC-011' above on other matters raised.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			that the Parish Council must object to this proposal.	



5.4 Earls Barton Parish Council

Table 5.8: [RR-1222](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EBPC-001	Ecology and Biodiversity Transport and Access	Environmental Impact, Transport effects and food security	Earls Barton Parish Council objects to this proposal for the following reasons: Primary reasons - Environment (impact on the Nene Valley SSSI and Ramsar site, loss of wildlife and biodiversity) and Transport (local impact on Earls Barton) Secondary reasons - Loss of farmland and food security, scale of the development and the lack of detail in relation to community benefits. We will submit further information in due course.	An assessment of potential impacts on wildlife and biodiversity, including on the Upper Nene Valley Gravel Pits SPA, SSSI and Ramsar site, is provided in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Although the potential for significant adverse effects was identified (predominately through the loss of Functionally Linked Land associated with the SPA), the mitigation measures outlined in the ES Chapter, such as the provision of mitigation land to offset these losses, are anticipated to reduce these adverse effects to neutral, non-significant levels. Potential impacts on the SPA and the mitigation implemented for the loss of Functionally Linked Land is discussed further in the HRA Revision A [EX1/GH7.22_A]. The design of the Scheme has taken into account the presence of ecologically valuable and sensitive habitats, and the scheme has avoided impacts on these features as far as possible. This is evidenced by the retention of valuable habitats within the Order Limits wherever possible, as well as the range of protective ecological buffers that have been applied to sensitive ecological features. Further



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				information on these protective buffers and other measures taken to avoid impacts on sensitive habitats and protected species can be found in the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and the OEPMS Revision A [EX1/GH7.5_A]. Whilst there is no statutory obligation to deliver a biodiversity net gain for NSIPs, the Scheme has committed to delivering at least a 10% gain, as per Commitment EN010170 – EB– 19 in the ES Chapter 27 Commitments Register Revision A [EX1/GH6.2.27_A]. An assessment of construction traffic is provided in ES Chapter 13: Transport and Access [APP-050]. This includes an assessment of potential local impacts on roads around Earls Barton including Mears Ashby Road and the A4500. These routes will accommodate limited traffic associated with the access to a small section of Green Hill E adjacent to Mears Asby Road and the cable connection corridor access points to the east of Earls Barton. The Scheme is likely to remove up to 1,200 ha of land from arable use during the Scheme's lifetime. Of assessed landholdings impacted, this accounts for no more than a 27% loss of land to any individual landholding (as assessed in ES Chapter 20: Agricultural Circumstances



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				[APP-057]), demonstrating that these farming businesses are likely to be able to continue to grow food whilst having a more stable income stream available to them. With respect to land in arable use in North Northamptonshire, West Northamptonshire, and Milton Keynes City (134,000 ha⁴) this loss is less than a 0.9% loss in arable land area. The Scheme provides direct public benefit with regard to renewable energy production, landscaping enhancements, ecology and biodiversity enhancements, improvements to PRow network connectivity, and economic benefits to communities. These are described throughout the Environmental Statement [APP-038 to APP-064] and secured through the relevant mitigation and management plans secured by requirement in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Please refer to the Applicant's response to 'SBMP-007' above

⁴ Department for Environment, Food & Rural Affairs (2025). Numbers of holdings and agricultural activity by English County/Unitary Authority at 1 June each year: 2024. Available at www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june



5.5 Easton Maudit Parish Meeting

Table 5.9: [RR-1223](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EMPM-001	Cultural Heritage	Conservation Importance	1. Easton Maudit is a small 'Conservation' village of historic importance, with an outstanding Grade 1 church constructed in 1320 which is surrounded by actively farmed undulating crop-bearing agricultural land and whose landscape setting is defined by tree groups, treed hedgerows, and hedgerows bisecting the open countryside, public highways and rights of way.	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] , contains a detailed assessment of the potential impact of the Scheme on cultural heritage, including in relation to the village of Easton Maudit and its setting. This has identified a Moderate adverse effect would occur to the Easton Maudit Conservation Area and the Grade I Listed Church of St Peter and St Paul (NHLE 1189610) as a result of the Scheme (see ES Appendix 12.9: Cultural Heritage Impact Assessment Tables [APP-149]). Please refer to the Applicant's response to 'SBMP-003' above for mitigation.
EMPM-002	Landscape and Visual	Height of solar panels	2. The principal concern of the villagers is the proposal to surround the village with arrays of 4.5 metre high PV 'tracking' solar panels, which will effectively destroy the appearance and amenity of the village itself not merely for the villagers but also those members of the public who choose to seek recreation walking its footpaths now and for generations to come. As a result, none of the multitude of footpaths will retain views of the	ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure resulting in Significant adverse effects to landscape character and visual amenity. NPS EN 1 recognises that impacts and effects are likely to be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			churches and familiar countryside landmarks over their whole length as their views will be replaced on one side (or both sides) of each path by a black curtain of 4.5 metre high PV Panels which will obliterate all normal views.	experienced with large scale ground mounted solar developments. Please refer to ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.8_A] for details on Visual Assessment. The layout of the Scheme for Site F has included a number of design responses included to maintain intervisibility of churches within the landscape, notably the Church of St Peter and St Paul at Easton Maudit, the Church of St Mary at Grandon and the Church of St Mary at Bozeat. This avoidance of infrastructure can be seen in fields FF8, and FF11. Panels are also not proposed within fields FF13, FF14 and FF16 to maintain the open setting of Easton Maudit. Avoidance in these fields inhibits panels being immediately alongside both sides of Easton Way, maintaining open approach into and out of the settlement of Easton Maudit.
EMPM-003	Glint and Glare	Glint and Glare effects to the public	3. An additional feature of the panels is that they will be prone to 'glint and glare' which will negatively impact not only their amenity to walkers but also to riders and their horses, seeking to enjoy the views from bridleways: which is likely to diminish the attractiveness of rides and diminish the financial viability of the Stables.	The Glint & Glare Assessment considered receptors along Public Rights of Way (PRoW) and horse facilities. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors, rather than the amenity. As outlined in ES Chapter 15: Glint and Glare [APP-052] in section 15.4.21, the sensitivity of PRoW and horse facilities have been categorised



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				as 'low', and the maximum magnitude of impact for PRoW and horse facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. The Applicant also notes that the British Horse Society Advice for Access and Rights of Way (August 2025) confirms that the Society "has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses", and that reports "indicate no reflection and no reaction from or impact on horse or rider". As such, glint and glare has not in itself been considered as a factor in the assessment of impacts to PRoWs or to equestrian facilities in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] . The Scheme also seeks, through the provision of permissive paths for equestrian users, to improve opportunities for riding and hacking on the PROW network on and around the Sites.
EMPM-004	Cultural Heritage	Impact on the Historic Landscape	4. Importantly, the damage that the Applicant proposes to inflict on the historic landscape surrounding Easton Maudit appears to be inflicted in wholesale disregard of Policy 3 of the	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] and ES Appendix 12.7: Historic Landscape Assessment [APP-147] , has assessed the potential impact of the Scheme on the historic landscape



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			North Northamptonshire Core Strategy 2011 – 2031 which is as follows: “Development should be located and designed in a way that is sensitive to its landscape setting, retaining and, where possible, enhancing the distinctive qualities of the landscape character area which it would affect. Development should: a) Conserve and, where possible, enhance the character and qualities of the local landscape through appropriate design and management. b) Make provision for the retention and, where possible, enhancement of features of landscape importance. c) Safeguard and, where possible, enhance important views and vistas including sky lines within the development layout. d) Protect the landscape setting and contribute to maintaining the individual and distinct character and separate identities of settlements by preventing coalescence.	surrounding Easton Maudit, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Chapter 12: Cultural Heritage [APP-049] for embedded mitigation and Section 12.11 for additional mitigation). The visual corridor will be retained along key views between heritage assets (i.e. the Churches in Grendon, Bozeat and Eastern Maudit) through not introducing solar panels into Fields FF9, FF13, FF14, FF16 and FF22, and offsets in Fields FF11, FF15, FF19 and FF26. This includes offsets along PROWs with historical associations that run between the Villages. Enhancement of existing hedgerow and tree belts has been proposed to screen historic assets within the Easton Maudit Conservation Area. Please refer to the Applicant's response to 'SBMP-003' above for mitigation. The ES Chapter 8 Landscape Visual Impact Assessment [APP-045] identifies a significant adverse effect to the character of the landscape within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure, before the mitigation planting has become established. The effect is reduced to not



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				significant from Year 15 of operation, with no significant residual effects. The LVIA identifies a significant beneficial effect to the Landscape Fabric of the Sites from Operation Year 15 and at decommissioning. Landscape Fabric refers to the tangible elements of the Site that contribute towards the landscape character, such as landform, woodland, hedges, tree cover, vegetation which can usually be described and quantified. The beneficial effect is found in relation to the extensive mitigation and enhancement planting secured in the OLEMP Revision A [EX1/GH7.4_A].
EMPM-005	Landscape and Visual	Damage to landscape across the whole project.	5. As well as the damage to the Easton Maudit landscape, the villagers deplore the aggregate damage to the landscape over the whole Green Hill Project.	ES Chapter 8 Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons are set out below:



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				1. Dispersed nature of the Sites: The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. 2. Nature of Scheme being 'overlaid' and reversable: For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' on the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. 3. Strong framework of existing vegetation: The strong framework of existing vegetation means that this would



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				provide the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. 4. The benefits of mitigation: Year 15 would bring forward the benefits of the new planting in reducing the adverse effects. Please refer to ES Chapter 8 Landscape and Visual Impact [APP-045] specifically Table 8.10 which sets out the Planting Typologies utilised within the ES Figures 4.10 to Figure 4.20 Landscape and Ecology Mitigation Plans [APP-207 to APP-219] and Table 8.11 to sets out the quantity of landscape enhancements the Scheme would provide: • 14.45ha of Green Corridor and Woodland Planting; • 12.81ha Enhanced Riparian Native Planting; • 43.13km of Hedgerow Reinforcement and Reinforced Roadside Vegetation; • 15.61km of Proposed Hedgerows;



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				• 6 proposed Ponds and Wader Scrapes; and • 1,079.6ha of Groundcover. 5. Biodiversity Net Gain: In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver additional enhancement and connections to wider ecological networks as well as contributing to the enhancement of the quality of the landscape going well beyond biodiversity net gain. 6. Legacy Landscape: Legacy Landscape is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, agricultural fields would be returned back to agriculture. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
EMPM-006	Agriculture and Soils	Food Security and loss of BMV land.	6. In addition, the villagers do not agree that the use of BMV agricultural land for the proposal is justifiable. The Applicant has obviously made no attempt to seek out and use land of lower quality and does not care about	Please refer to the Applicant's response to 'SBMP-001' above on site selection. As set out in ES Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A], the Applicant has undertaken a five-stage site selection



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			food security for the UK. Moreover, the Applicant has made no attempt to justify its use of 1,200 hectares acres of predominantly BMV land to generate up to 500 MW of electricity: the proposed "land take" is substantially in excess of the land required for the generation of 500 MW of electricity.	process with an initial search area of 5 km radius from the Grendon Substation. The search area was then enlarged incrementally, with the clear preference of identifying land as close to the Grendon Substation as practicable, until sufficient options for the land required for the Scheme were identified with willing landowners within a 20 km radius. This is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The search outcome indicates that the majority of the land within the 20 km search area is Grades 3 or 2 land with high (>60%) to moderate (20-60%) likelihood of BMV land. The 1200 ha land for the proposed Scheme only represents 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK therefore it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				cycle. The 1200 ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security. UK Food Security Report 2024 indicates that the 6.0 million hectares of the croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%. Table 4 in the Statement of Need [APP-556] shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. Furthermore, paragraph 7.7.1 Statement of Need [APP-556] states that NPS EN-3 indicates that along with associated infrastructure, a solar farm typically requires between 2 to 4 acres for each MW output. NPS EN-3 states in paragraph 2.10.17 that this range will vary significantly depending on the site, with some being larger and some being smaller. Therefore, this range does not act as a maximum size of site.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range when calculated based on the panel and associated development land as is described in Section 4.2 of the ES Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A]. This demonstrates that the proposed locations for the Scheme are suitable sites which can accommodate an asset which is consistent with government's view of best practice ratios of land take and installed capacity.
EMPM-007	Transport and Access Noise Consultation	Impacts during the construction phase. Justification for the Targeted Consultation and impacts to Easton Way	7. The villagers will be greatly discomfited by the noise and traffic congestion generated during the construction period by the considerable amounts of construction necessary. As regards the so-called 'Targeted Consultation' they require proper justification of the late decision by the Applicant to add a request to enlarge the scope of the land requirements of the scheme to control (in an unparticularised manner) the highways specified including, in particular, one segment over Easton Way between the west door of the church and the end of that road, a road that the Applicant had regularly assured residents would not be used for access to the site.	An assessment of construction traffic is provided in ES Chapter 13: Transport and Access [APP-050] and the submission includes an OCTMP Revision A [EX1/GH7.9_A] to manage movements. Easton Way may be used by construction workers and will be used to connect the A509 to the Green Hill F and Cable Connection Corridor entrance points. The extended areas are in place to allow flexibility for potential traffic management measures such as Temporary Speed Limits. More specifically, the comments appear to relate to access CR22 as presented in ES Figure 13.16 Access Locations for Sites and Cable Route Corridor South Area Part 2 [APP-447]. This provides access to the cable route corridor and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				would be accessed via Green Hill F and a further access to the west. The use of Easton Way to the west of the access by HGVs is not proposed. As detailed in ES Chapter 14: Noise and Vibration [APP-051], noise modelling has been completed which assesses the noise levels associated with construction of Green Hill BESS. All impacts are deemed either negligible or low, with residual effects deemed not significant. Impacts from dust, noise, and HGV movements on human health and wellbeing have been assessed in ES Chapter 18: Human Health [APP-055] and find no significant adverse effects to human health in any location surrounding the Scheme. This is subject to mitigation measures as set out in the OCEMP Revision A [EX1/GH7.1_A], which is secured by Requirement 13 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
EMPM-008	General Matters	Location of BESS sites	8. The Bess Installations: The second great concern of the villagers is the proposal to install a substantial quantity of storage batteries in the BESS areas in neighbouring Grendon and in the Green Hill C sector.	ES Chapter 5: Alternatives and Design Evolution [APP-042] details how the design of the Scheme has evolved following public consultation. The OBSSMP Revision A [EX1/GH7.7_A] provides a summary of the safety related information requirements which will be provided in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				advance of construction of the BESS. The purpose of this OBSSMP is to identify how the Applicant will use good industry practice to both prevent and reduce risk to life, property, and the environment from a BESS failure event. Prior to the commencement of construction of the BESS, the Applicant will be required to prepare a BSMP which must be in accordance with this OBSSMP Revision A [EX1/GH7.7_A]. As part of preparation of the detailed BSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally. This is secured in Schedule 2, Requirement 6 of the Draft DCO Revision A [EX1/GH3.1_A]. ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167] demonstrates that there are no significant impacts on all sensitive receptors within a 1 km radius of BESS areas.
EMPM-009	Other Environmental Matters	Battery type and safety	9. The villagers note that the Applicant has at every stage during the informal and statutory consultation failed to give appropriate information about the widely acknowledged acceptance amongst the scientific and industrial community of the fact that Lithium	The OBSSMP Revision A [EX1/GH7.7_A] and ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167] outlines how a BESS failure event can be prevented and off-site impacts fully mitigated.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			batteries are at risk of thermal runaway and self-combustion due to a variety of circumstances including manufacturing defects, impact during handling and immersion. It is well known now that battery fires are notoriously difficult to extinguish and there is a risk of contamination and pollution of, inter alia, waterways and the River Nene and the Ramsar protected areas. Even now the villagers wish to investigate why the Applicant has persisted in giving so little information about the source and number of batteries which they propose to use and the risks to the community from their use.	The modelling report assesses the environmental impact of a BESS thermal runaway incident to sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility to the local road network. The report concludes there are no significant impacts to sensitive receptors within a 1 km radius of BESS areas. The BESS system selected at detailed design will include integrated fire and explosion prevention and protection systems following key industry safety standards i.e. NFPA 855, UL 9540, BS EN IEC 62933-5-2, and based on comprehensive UL 9540A (2025, 5th



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Edition) testing. The selected BESS as mandated under NFPA 855 (2026 Revision) will have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate minimum safe equipment spacing distances and performance test active and passive mitigation systems integrated into the BESS design. A BESS system and site-specific Emergency Response Plan (ERP) will be developed at the detailed design stage, based on national and international best practice measures. The ERP is secured in Requirement 6 and 13, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. Potential pollution pathways from BESS firewater are addressed in ES Chapter 10 Revision A [EX1/GH6.2.10_A] and the FRADS Report Revision A [EX1/GH6.3.10.1_A]. Section 5.3 of the OBSSMP Revision A [EX1/GH7.7_A] sets out the measures for containing and isolating firewater in the event of a BESS incident. The outline drainage strategy includes impermeable liners, isolation valves and firewater containment with testing and tanker removal if contaminated, ensuring there is no



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				uncontrolled release of firewater, chemicals or other pollutants.
EMPM-010	Other Environmental Matters	Waste Materials	10. Finally, Waste Materials: If the Applicant is granted a DCO, the Villagers wish the SOS to ensure that any Order is made on terms that the Applicant remains responsible for the disposal of all waste materials whenever arising, whether at the end of the proposed 60 year term or on an earlier date when the scheme becomes obsolete and financially unviable	The Applicant confirms that they are responsible for the decommissioning of the Scheme and removal of all waste materials arising from the Scheme, as part of the Applicant's obligations to restore the land to its current use once the Scheme has been decommissioned. The Applicant confirms this would occur whenever the Scheme's decommissioning takes place (with 60 years being the maximum lifetime the Scheme is permitted to operate). The Applicant will comply with all applicable waste management legislation at the point of decommissioning. These measures, and a commitment to provide a Decommissioning Resource Management Plan including a Decommissioning Waste Management Strategy, are set out in the ODS Revision A [EX1/GH7.3_A] , which is secured by Requirement 21 of Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A] , and is therefore a legally binding obligation.



5.6 Grendon Parish Council

Table 5.10: [RR-1226](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
GrPC-001	Alternatives and Design Evolution	Scale and Location	We feel there are not enough demonstrable and imperative reasons of overriding public importance to justify the scheme with some of our concerns we have summarised as below: Scale and location - The project spans nearly 2,965 acres (~1,200 hectares) across multiple villages, transforming rural countryside into an industrial zone. This includes a proposed 500 MW solar photovoltaic (PV) generation facility and a large-scale Battery Energy Storage System (BESS). Solar arrays, substations, transformers, inverters, fencing, CCTV towers, and a significant underground cable corridor form the infrastructure. The cable route will impact EVERY road in the vicinity and cause widespread destruction of the environment with the channel for the cables being a MINIMUM of 50 metres wide.	Please refer to the Applicant's response to 'SBMP-001' above. Please refer to 4.2.10 within ES Chapter 4 Scheme Description [APP-041] where it is stated the corridor width is wider than the final corridor construction width to maintain flexibility within the schemes design.
GrPC-002	Agriculture and Soils	Food Security	Food security/loss of productive farmland - 66% of the proposed development area is Best and Most Versatile land BMV which planning law states should NOT be used for solar in the first instance. It should be brownfield sites, rooftops, and lower grade agricultural land eg Irchester tip along A509.	Please refer to the Applicant's response to 'SBMP-001' and 'EBPC-001' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
GrPC-003	Ecology and Biodiversity Socio-Economics, Tourism and Recreation	Pollution Risk Community Impact	Environmental and Biodiversity - The proposed BESS would be sited close to the Nene Valley SSSI/RAMSAR/SPA sites. Resulting in Pollution risk from BESS run off, disruption to nesting sites during construction phase. There are Bitterns behind Pastures Farm for instance. The Site F (Easton Maudit) spans many popular local footpaths which will be made corridors of solar panels with high fencing and CCTV cameras. The Waendel Walk will also be impacted, therefore impacting tourism in the area.	Pollution risks are addressed, with appropriate mitigation measures detailed, in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. The OCEMP Revision A [EX1/GH7.1_A] and OEPMS Revision A [EX1/GH7.5_A] detail how vehicles, plant and materials will be transported to the construction zone, as well as other standard environmental protection measures that will apply to the construction phase, such as dust suppression, pollution control measures and protection of adjacent habitats/watercourses from surface runoff. A bespoke OBSSMP Revision A [EX1/GH7.7_A] has also been developed. In terms of disturbance, the Order Limits are 15m from the SPA at the point of connection with the Grendon substation; here impacts are only possible during a brief period of construction. The actual BESS compounds are sited at least 350m from the SPA, and south of the existing Grendon substation. As detailed in the HRA Revision A [EX1/GH7.21_A], the risk of visual and noise disturbance to species within the SPA, including bitterns,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				is curtailed by the presence of existing tall hedgerows and treelines between the Site and the SPA, and the sunken nature of the gravel pits. Direct impacts on nesting birds and disturbance of species which receive protection under Schedule 1 of the Wildlife & Countryside Act 1981 (including bittern) will be avoided, with mitigation measures detailed in the OEPMS Revision A [EX1/GH7.5_A]. With respect to footpaths in Green Hill F, substantial offsets (minimum 15 m from PRow centrelines to solar array fencing) and some areas of open fields are provided to ensure PRow users are separated from onsite infrastructure to mitigate against users feeling enclosed where crossing the Site. Some enclosure may be experienced where screening planting has been proposed, albeit this is also proposed to be set back from the PRow route. Fencing will consist of deerstock fencing, while CCTV would be located within the fenced areas, and directed into the Site rather than towards users of the PROWs. These design



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				measures are set out in the OLEMP Revision A [EX1/GH7.4_A] which is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Impacts on the Waendel Walk are set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A], which identifies a significant adverse effect to users of the Waendel Walk due to direct impacts from the construction of Green Hill F, the Green Hill BESS site, and cabling works. The Applicant has committed to mitigation measures to limit the impacts to users of this route, and will continue to work with Wellingborough Town Council to ensure that suitable diversions if required are put in place for the Waendel International Walk annual event.
GrPC-004	Landscape and Visual Impact	Visual effects	Landscape and visual Historic footpaths and ridge-and-furrow fields are under threat of visual and physical degradation. The landscape between Grendon and Easton Maudit is classed as undulating land, which in planning policy it states should be	The ES Chapter 8: Landscape and Visual Impact [APP-045] assess views of the array from residential properties within the settlement of Grendon (RS13) and identifies that there would be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			avoided for use for solar. Grendon is on a hill and therefore the solar arrays will be highly visible from certain parts of the village e.g Sharplands. The BESS will also be highly visible from much of the village e.g Church Way, Main Road.	glimpsed, filtered views of the array, but that these would be restricted to the eastern edges of the settlement, with intervening vegetation, and changes in topography providing relief, resulting in Minor Adverse effects. Additionally, the LVIA considers effects associated with views of the proposed BESS adjacent to the National Grid Substation to the north of the settlement. Concluding that for residential properties within the settlement, until mitigation planting has established that there would be long distance filtered views of the development alongside the existing infrastructure of the Substation leading to Minor Adverse effects. The ES Chapter 8: Landscape and Visual Impact [APP-045] assess views of the array from residential streets within the settlement of Grendon, including Sharplands (TR120) concluding that there would be views towards panels within the sloping fields FF3, FF4 and FF5 at distance to the east resulting in Minor Adverse effects.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Views of the proposed BESS were identified from Main Road (TR058) with glimpsed views west of BESS1 with the proposed infrastructure seen at distance in conjunction with the existing pylons and substation. Church Way (TR121) is an enclosed curved road within Grendon connecting Station Road to Main Road. The road is enclosed with residential properties, associated vegetation and driveways heavily enclosing the street and screening views out over the countryside to the north of the village. However, it is acknowledged that those residential properties on the western edge of Grendon would have rear elevation views towards the proposed BESS Site.
GrPC-005	Cultural Heritage	Heritage assets Archaeological remains	Heritage Assets The area includes over 300 listed buildings within 5 km, including 10 Grade I *assets such as the Church of St Peter & St Paul (Easton Maudit). There are several archaeological sites in the fields around Easton Maudit.	ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed the potential impact of the scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-049] for embedded



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				mitigation and Section 12.11 for additional mitigation). Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120] details assets scoped in for assessment and was used during consultation with Historic England and the local planning authorities. Scoped in assets are considered to be agreed with both stakeholders. A Moderate adverse effect would occur as a result of the Scheme on the Church of St Peter and St Paul (NHLE:1189610) (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). The visual corridor will be retained along key views between heritage assets (i.e. churches) through the embedded mitigation in the form of removal of solar panels from Fields FF9, FF13, FF14, FF16 and FF22, and offsets in Fields FF11, FF15, FF19 and FF26. This includes offsets along PROW with historical associations that run between villages adjacent to the Scheme (i.e. Grendon, Eastern Maudit and Bozeat). Enhancement of existing hedgerow and tree belts has been



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				proposed to screen the Easton Maudit Conservation Area and Church of St Peter and Paul. ES Chapter 12 Cultural Heritage [APP-049], supported by appendices [APP-121 to APP-146 and APP-149] has assessed the potential impact of the scheme on identified archaeological assets. Where required appropriate mitigation is proposed. See Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] for embedded mitigation and Section 12.9 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146].
GrPC-006	Transport and Access	Construction traffic	Transport Grendon is a conservation village with narrow roads and heritage buildings. It houses the best primary school in the area, many children walking to school on narrow pavements and it is NOT SUITABLE for HGV traffic. The plan proposes HGV and LGV and construction worker routes through the village and on to Yardley Road (a narrow bendy road not wide enough for white lines). This proposal includes the construction of a compound just along the Yardley Road past our football pitch and	The HGV routes are not proposed through Grendon. The assessment presented in ES Chapter 13 Transport and Access [APP-050] acknowledges some workers may take this route but this will not be encouraged. Yardley Road is used to access the Cable Route Corridor and facilitate movements across the road rather than along the road.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			across the fields to Easton Maudit and down towards the substation. The impact will be intolerable to the village and residents. Most of the original houses do not have foundations as such and heavy lorries cause properties to vibrate, so there is concern that significant damage may be done to these properties.	
GrPC-007	Other Environmental Matters Hydrology and Flood Risk	Battery storage safety concerns	Battery storage safety concerns - The proposed BESS could pose a significant fire and risk, especially near Grendon and flood-prone areas. THERE IS NO EMERGENCY CONTAINMENT PLAN IN THE DCO. Emergency response protocols for BESS incidents are underdeveloped and raise safety concerns as it is not possible to extinguish a fire with water, but they are left to burn. This can result in toxic spills and run-off into the special protected areas infrastructure stress and environmental pressure. There is no published Battery Safety Management Plan in the DCO. Other planning authorities (e.g. Suffolk for Sunnica) have refused or delayed BESS approvals until such data is provided. Battery storage Cumulative effects There has been no cumulative impact assessment undertaken and included in the DCO. The village already has one BESS site for 49.99MW and another has secured planning permission next to it for another 49.99MW, so with Greenhill BESS of up to 500MW's this would dramatically increase the	The OBSSMP Revision A [EX1/GH7.7_A] produced by the Applicant, outlines the key fire safety provisions for the BESS proposed to be installed at Green Hill Solar Farm (Green Hill BESS and Green Hill C) including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. The OBSSMP provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. The purpose of the OBSSMP is to identify how the Applicant will use good industry practice to reduce risk to life, property, and the environment from the BESS. Prior to the commencement of construction of the BESS, the Applicant will be required to prepare a detailed Battery Safety



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			industrial scale of battery installations in a rural setting, significantly intensifying risk. There is a requirement for an explicit cumulative assessment under EIA/HRA regulations if additional large-scale BESS is permitted adjacent to an already consented installation. Flood Risk Compounding All BESS sites (Statera and Greenhill) lie near the River Nene floodplain, with known Zone 2/3 overlaps. A single fire, flood or spill incident could overwhelm shared surface water systems and affect the Nene Valley SPA/SSSI/Ramsar. No cumulative Flood Risk Assessment (FRA) or hydrological study has been published combining all three sites.	Management Plan (BSSMP) as secured by Requirement 6, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A] which must be in accordance with this OBSSMP. As part of preparation of the BSSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally. Section 6 of the OBSSMP documents the pre-construction requirements which are secured through the Requirement 6, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A] The Applicant has also commissioned a Plume Analysis study BESS Fire Emissions Modelling Report [APP-167] to assess the environmental impact of a BESS thermal runaway incident to sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility to the local road network. Please also refer to ES Chapter 25: Cumulative Effects and Effects Interactions [APP-062], where effects from flood risk, safety and pollution are assessed.
GrPC-008	Energy Need and Policy	North Northamptonshire Joint Core Strategy	Planning Policy Non-Compliance NPS EN-1 (para 4.2.6) and EN-5 require cumulative impacts to be identified, assessed and mitigated. NPS EN1 / EN3 – requires public safety “acceptable and appropriately mitigated”- which has not been demonstrated. Local plans (North Northamptonshire Joint Core Strategy) stress the need to avoid infrastructure clustering that results in environmental harm or cumulative pressure on rural areas.	Please refer to ES Chapter 25: Cumulative Effects and Effects Interactions [APP-062], where other developments are considered in proximity to the proposed Scheme. Please refer to the Applicant's response to 'CRNBPC-011'.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Buckinghamshire Council recently refused Statera's Granborough/Buckinghamshire 500 MW BESS development, citing concerns over fire risk, rural landscape harm, and cumulative impact with adjacent solar farms. The council noted that once a permit area becomes saturated with such installations, the community and environment cannot absorb further infrastructure without significant cumulative harm.	
GrPC-009	Consultation	Lack of community engagement	Inadequate community engagement Lack of proper consideration of alternative locations Our Residents report the consultation process was inaccessible, overly technical, and lacked genuine consideration of alternatives.	The Applicant remains confident in the level of consultation undertaken and the information presented. Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Chapter 4 of Consultation Report Revision A [EX1/GH5.1_A] describes the Applicant's approach to non-statutory consultation, including early engagement meetings and Early Engagement Workshops where community groups, local council and parishes were invited to share their insights on early design ideas.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Chapter 7 and Chapter 8 of Consultation Report Revision A [EX1/GH5.1_A] describe how the Applicant undertook a six-week statutory consultation on the Scheme, during which the Applicant presented the consultees with a preliminary environmental information report (PEIR). A non-technical summary was published to accompany the PEIR, and a consultation brochure was published to help consultees understand the proposals and the potential significant effects of the Scheme. Chapter 10 of Consultation Report Revision A [EX1/GH5.1_A] describes the significant volume of responses received from Section 42 consultation and Section 47 consultation, including the issues raised and how these were considered by the Applicant.



5.7 Hannington Parish Council

Table 5.11: [RR-1227](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HaPC-001	Landscape and Visual Agriculture and Soils Transport and Access	Visual Effects Loss of prime agricultural land Increase in traffic levels	• The potential loss of amenity • The additional infrastructure – fencing/security lighting was not commensurate with open countryside • The site represents industrialisation of the open countryside – consider using other “brown field” sites • Loss of prime agricultural land – Grades 1, 2 & 3A • Increase in traffic levels once the site is operational – maintenance/service/cleaning on unsuitable country roads • Increase in the density and weight of traffic – the countryside roads where/are not built for that use • Increase in operational noise from the panels & sub-station • Limited amount of data in Green Hill Solar Farms documentation and no specifications.	ES Chapter 8: Landscape and Visual Impact [APP-045] recognises the shift from open agricultural farmland to large scale solar infrastructure stating that the character of the Sites themselves and their immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme leading to Significant adverse effects on local landscape character. However, this needs to be considered against the ability of the receiving landscape to accommodate the low lying infrastructure. Within the study area there would be limited appreciation of the array or associated infrastructure, with the integrity of the character of the wider receiving landscape preserved, along with landscape features within retained and enhanced. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now presenting as a large-scale solar scheme. The LVIA recognises the long-term adverse effects upon the character of the local landscape with residual effects being identified as being Moderate / Minor Adverse. The LVIA assesses the visual effects to private receptors (e.g. residential properties), transport receptors (e.g. drivers on the public highway) and public receptors (e.g. users of public rights of way). The assessment of visual effects is aided by the production of viewpoint photography with a number



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				of viewpoints chosen for Accurate Visual Representation (AVR). This process involves placing a model of the Scheme into the landscape to understand its visibility from the selected location. The Applicant consulted with and agreed the viewpoint locations and the 26 locations selected for AVR montages with Landscape Officers from North Northamptonshire and West Northamptonshire Councils. The viewpoint locations are shown in Figure series 8.10 [APP-308 to APP-313], which also show the location of the viewpoints for which AVR montages have been produced. The Visual Assessment identified significant effects to: Private Receptors: 11 receptors during construction and Year 1 – no significant effects at Operation Year 15 or Decommissioning. Transport Receptors: 14 receptors during construction and Year 1 – no significant effects at Operation Year 15 or Decommissioning. Public Receptors: 27 receptors during construction and Year 1 – with significant effects remaining for 3 receptors at Operation Year 15 and Decommissioning. The LVIA also included an assessment of Sequential Visual Effects for the following Recreational Routes which pass through the Scheme: • The Northamptonshire Round;



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				• The Milton Keynes Boundary Walk; and • The Three Shires Way. Whilst there would be an appreciation of an overall increase in solar infrastructure as users of these routes move through the landscape, the discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features helping to assimilate them into the landscape. The Applicant has undertaken a 5-Stage Site Selection Process with a Widening the Search to consider Best and Most Versatile (BMV) Agricultural Land Site Selection Assessment Revision A [EX1/GH6.3.5.1_A], to avoid the use of BMV land as much as possible in compliance with National Policy Statement for renewable energy infrastructure (EN-3). The proposed development only results in partial and temporary loss of productive farmland as the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. An assessment of construction traffic is provided in ES Chapter 13 Transport and Access [APP-050] and identifies that operational traffic movements for maintenance will be low. The submission includes an OCTMP Revision A [EX1/GH7.9_A] with measures to specifically



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				manage and control the displacement of muck on the highway. ES Chapter 14: Noise and Vibration [APP-051] has considered the assessment of likely significant effects in respect to noise and vibration of the site during operation (<i>as well as construction, and decommissioning phases of the Scheme</i>). The assessment is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of the Scheme and nearby existing sensitive receptors. Noise predictions and subsequent assessments of impacts have been carried in accordance with current policy and guidance, and the methodology discussed and agreed with all relevant statutory bodies. In respect to operational noise, the assessment results predict that noise levels from the Scheme (i.e., from the tracker panels & sub-station) are predicted to be no higher than the representative background noise levels at the closest sensitive receptors during the daytime and night-time periods. This is an indication of a Moderate/ Minor effect and not significant. The assessment also predicts noise from replacement activities (of batteries and panels) to be equivalent to an effect which is not significant. The Applicant has set out in its response to comment 'GrPC-009' above regarding the consultation process and the robustness of that process. In relation to the point raised about a lack of specifications, within the DCO Application, the maximum design parameters of the battery storage are set out in Section 4.4 of ES Chapter 4: Scheme



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Description Revision A [EX1/GH6.2.4_A], and in the CDPP Revision A [EX1/GH7.17_A]. The Applicant has not specified the type of battery but the principle of setting out maximum parameters is considered to apply the Rochdale Envelope. This is an agreed method for defining the maximum (and where relevant, the minimum) parameters for the Scheme where flexibility needs to be retained to take advantage of improvements in PV panel technology. The exact battery design and specification will be decided at the detailed design stage but will need to meet the parameters set out in the CDPP Revision A [EX1/GH7.17_A]. This is secured in Schedule, Requirement 5 of the Draft DCO Revision A [EX1/GH3.1_A].



5.8 Holcot Parish Council

Table 5.12: [RR-1229](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HoPC-001	Alternatives and Design Evolution	Development on agricultural land	1. The SR states (page 24, para 2.2.59) that: “the ES will include a chapter setting out the alternatives considered and the main reasons for selecting the chosen option. The chapter will focus on the following aspects of option selection: • Site selection. • Alternative technologies. • The layout of the Scheme. • Cable Corridor options. • The location of supporting infrastructure.” • (i) Having regard to paragraph 2 of Schedule 4 of the Regulations, the “description of reasonable alternatives” should include, inter alia, location, scale and size. • (ii) The main reasons for selecting the chosen option should also include “a comparison of the environmental effects” of the options. (It is noted, in this regard, that the SR acknowledges (page 326, para 21.3.14) that it is not known whether the development of Sites	The Applicant notes this representation appears to be referencing the Applicants scoping report and not the DCO submission documents. The Applicant would respectfully direct the respondent to review the submission documents that are available via the Examination Library, including ES Chapter 5 Alternatives and Design Evolution [APP-042]. The Applicants submission documents have been prepared in response to the comments received through the Scoping Opinion [APP-075] and at the statutory consultation stage. It is noted that the extent of Grade 3a was not known at site selection stage before the completion of the detailed ALC survey (so as other detailed Environmental Surveys). It is not viable to complete all detailed Environmental Surveys at siting stage commercially. However, the Likelihood of Best and Most Versatile (BMV) Agricultural Land was used during the search of the potential development areas (PDAs) within 20km search area. The results indicate that the farmland of the PDAs has a high to moderate likelihood of BMV land. The applicant undertaken a 5-Stage Site Selection Process, which included widening the search to consider Grade 3 Agricultural



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			A-F would involve development on Grade 3a agricultural land, in addition to Grade 2 land - both Grade 2 and Grade 3a land of course constituting "best and most versatile" agricultural land - because an agricultural survey to determine the sub-classification of the Grade 3 land had not been undertaken. Site selection appears therefore to have been determined contrary to Government advice in the National Policy Statement for Renewable Energy Infrastructure (EN-3) that "low and medium grade agricultural land should where possible be sought".	Land within the 20km search area ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] in compliance with National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection on commercial feasibility and the efficiency of the transmission of electricity to the grid.
HoPC-002	Alternatives and Design Evolution	Project Life span	2. Page 16, para 2.2.14 of the SR refers to an "operational phase" of "up to 60 years". (i) this is longer than anticipated by the relevant NPS (40 years) which, it is understood, is the typical upper limit (EN-3, para 2.10.65) and needs to be justified and the likely significant environmental effects of the whole period, and separately the additional	Please refer to the response to 'SBMP-005' above. The operational life of the Scheme will be a maximum of 60 years. Once the Scheme ceases to operate, it will be decommissioned. The impacts of decommissioning have been assessed throughout the Environmental Statement. Please refer to the ODS [EX1/GH7.3_A] which provides details and control measures of decommissioning activities. Further decommissioning plans will be produced prior to the commencement of the decommissioning phase of the Scheme.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			20 years, should be assessed in the ES. • (ii) by reference to page 16, para 2.2.12, 60 years clearly falls within the category “long term” (“lasting more than 5 years”) (or more than 10 years for LVIA: para 7.7.3) and cannot sensibly and reasonably said to be temporary. • (iii) the assessment should therefore be carried out on the basis that the development would, to all intents and purposes, be permanent; not only because 60 years generally represents the entire span of adulthood (or 2 generations) but also because paragraph 163 c) of the NPPF (December 2023) states that: “in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, and approve the proposal if its impacts are or can be made acceptable.”	Approval and implementation of these plans will be secured through a Requirement of the Development Consent Order Draft DCO Revision A [EX1/GH3.1_A]. NPS-EN-3 states in paragraph 2.10.65 that “<i>Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.</i>”



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HoPC-003	General	Grid connection confirmation	3. The proposed “assessment scenarios” (page 17, para 2.2.16 of the SR) include “Construction 2027-2029” and “Operation Year 1 2029” (from Q3). • No documentary evidence has been provided (e.g. a copy of any relevant, redacted agreement) to demonstrate that a connection to the grid etc would be achieved by 2029. • Unless and until this documentary evidence be provided, alternative, later “assessment scenario” years should be included in the ES.	The Grid Connection Statement [APP-557] sets out the connection arrangement. The National Energy System Operator (NESO) publishes a public list of all grid connection offers made. This is known as the Transmission Entry Capacity (TEC) register and can be found at: www.neso.energy/industry-information/connections/reports-and-registers. The register confirms the connection date is 2029.
HoPC-004	General	Decommissioning timescale	4. Page 17, para 2.2.16 of the SR also refers to a decommissioning year of 2089 but there is no reference to any financial bond being proposed to be put in place to ensure that the cost of decommissioning would be met. • In the absence of a bond, an assessment of likely significant environmental effects only up	The Applicant refers to its response to reference ‘ScPC-004’ below.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to 2089 cannot be assumed to suffice.	
HoPC-005	General	Mitigation vs cost	5. Paragraph 2.2.44 Page 21 This paragraph discusses 'apportionment' of mitigation. The costs of the Applicant's development are unlikely to be borne by existing developments where EIA has already been completed, and should not be borne by the public purse. The Planning Inspectorate should consider how they ensure the rigour that the Applicant puts into developing mitigation proposals (without avoiding costs) and how the report is made realistic in this respect.	Green Hill Solar is committing to provide mitigation and therefore the cost for doing so. Additionally, Green Hill Solar will be required to comply with the mitigation per the Requirements of the DCO. Please refer to the Funding Statement [APP-020] for further information that was submitted as part of the DCO Application.
HoPC-006	General	Document Filing	6. The titles to the appendices to the SR, as given online, are unhelpful, making it very difficult to find relevant information, e.g. Figures to Chapter 12 – were only eventually found in Part 8 of 8 of the Appendices. Similarly, e.g. the Appendix to Chapter 9 is to be found in Part 2 of 8 of the Appendices. The signposting is unacceptably poor and must be considerably	The Applicant notes this comment. Please refer to ES Chapter 1 Introduction [APP-038] where the structure of the Environmental Statement is set out.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			improved in the ES. (The SR documents have also not been uploaded (presumably by PINS staff) onto the website in sequential order. This does not assist members of the public.)	
HoPC-007	General	No reference to meetings with the MP for Daventry constituency	7. The SR states that there has been a meeting with Gen Kitchen MP for Wellingborough (page 13, para 1.5.1) but makes no reference to meetings with the MP for Daventry constituency (which includes directly affected land within West Northants Council's area) – formerly the Right Hon. Chris Heaton-Harris, now Stuart Andrew MP; nor to the MP for that part of the Milton Keynes' constituency in which part of the proposed project would fall (page 10, para 1.1.9). We believe that the MP's for every impacted constituency should be consulted.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. The early engagement during the non-statutory consultation phase is summarised in Chapter 4 of the Consultation Report Revision A [EX1/GH5.1_A]. The Applicant issued introductory letters to the MPs for Wellingborough and Daventry in January 2024, and to newly elected MPs in July 2024, for Wellingborough, Daventry and Milton Keynes. The full list of stakeholders the Applicant contacted in this period is provided in Consultation Report Appendix Non-Statutory Consultation Materials Part 1 of 2 [APP-025]. The Applicant provided a list of meetings with MPs in Chapter 4 of the Consultation Report Revision A [EX1/GH5.1_A], stating



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				meetings were held with Sarah Bool MP and Mike Reader MP in August 2024, and Stuart Andrew MP in September 2024. The Applicant notes Adequacy of Consultation Responses [AoC 001 – AoC-015] where consultees provided feedback on the adequacy of the consultation. The Applicant notes the Decision to Accept Application [PD-003] by the Planning Inspectorate as an indication that sufficient consultation was undertaken. The Applicant continued engagement with stakeholders post submission of the Application. The Applicant met with Mr Chris Curtis, Member of Parliament for Milton Keynes North, and host MP for Green Hill G, on key areas of concern in July 2025.
HoPC-008	Other Environmental Matters	Cumulative Effects	8. Page 20 2.2.39 These paragraphs discuss cumulative impacts. There are two aspects of this analysis necessary: • The cumulative aspects of the Proposal itself. – for instance, considering the cumulative impact of each facet of the analysis, and also the impact once all facets are considered as a whole. The impacts as described in the paragraphs when taken with other	The Applicant notes this comment. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the in-combination effects and cumulative effects of the Scheme. The assessment has been undertaken in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects and are presented within ES Chapter 25 Cumulative



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			approved developments, again against each facet. Paragraph 23.1.3 on page 343 refers to this analysis in part. However subsequent paragraphs imply that cumulative impact will only be assessed where a facet has a significant impact at a micro-level. Of course, whilst taken alone a facet might have perceived minimal impact, only when taken with other impacts will its individual impact be exacerbated. The Applicant should consider this in their analysis, so that all impacts are taken as a whole, however minor they may appear on an individual basis.	Effects and Effects Interactions [APP-062].
HoPC-009	Transport and Access	Concerns over transport assessment	We are concerned regarding the coalescence of the proposals with other proposals in the area at NNSUE (Overstone Leys etc) and in the West Northants Council Regulation 18 Local Plan, effectively eliminating the rural element which was and is the main concern of our Parishioners. This is allied to Northamptonshire in general being over-developed with the proposed Solar Farm, HS2, Warehousing Parks, the dualling of the A43, housebuilding etc. At a very local level, the Sywell Road	An assessment of construction traffic is provided in ES Chapter 13 Transport and Access [APP-050] . The consideration of cumulative impacts has been undertaken throughout the Environmental Statement by each technical chapter and summarised in ES Chapter 25: Cumulative Effects and Effect Interactions [APP-062] . Sywell Road is a c-class road and is proposed as an HGV construction route from the A43 to the site access points to Green Hill B and the cable connection corridor as presented in Environmental Statement Figure 13.3 Routes to Scheme Sites North



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			through Holcot is the de facto northern ring road for Northampton and whilst this road is classified by the Applicant as 'a local road' per the definition, it should be included in all road-related assessments as a significant route. (15.4.62 Page 258)	Area [EX1/GH6.4.13.3_A]. The route does not extend to Holcot and HGVs are not expected to pass through the village. It is recognised that the route through Holcot may be used by worker traffic and this has been assessed accordingly. The Applicant also notes that the Parish Council are referring to the glint and glare chapter of the Scoping Report when they reference 15.4.62 page 258. The Applicant would refer the Parish Council to the DCO submission of the ES Chapter 15 Glint and Glare [APP-052] for the latest assessment that has been undertaken.
HoPC-010	Landscape and Visual Impact	Grange Farm and Rectory Farm viewpoints	For Green Hill B, viewpoints should also be included for Grange Farm and Rectory Farm to the south (off the A43), and for all residential properties on Sywell road to the North. (Table 7.2 Page 128)	ES Chapter 8: Landscape and Visual Impact [APP-045] considers both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric of the landscape are taken into account as well as the views and visibility. The assessment includes a suite of viewpoints that cover a wide range of visual receptors, including public locations such as transport routes, PRow and residential properties. Viewpoints have been selected to represent the experience of different types of visual receptor, including users of PRow, residential properties, transport routes, heritage, and recreational sites. Selected viewpoints include specific locations that are



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				popular vantage points or tourist destinations, and those suggested through Section 42 and Section 47 consultation. Viewpoints have also been selected to illustrate landscape character effects or likely Cumulative Effects of the Scheme. A series of 'representative and specific viewpoints' are shown on ES Figures 8.10 [APP-308] to 8.10.5 [APP-313]. Verified photography and photomontages are shown on Figure 8.14.1 [APP-334] to Figure 8.14.NN13 [APP-400]. There are a total of 54 viewpoints covering the Study Areas for the Sites and the Cable Route Corridor. These viewpoints comprise initial viewpoints selected for the purpose of the assessment and likely to be affected by the Scheme and then additional viewpoints provided as part of the Section 42 Consultation. The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation, where a total of 13 additional viewpoints have been included and photography undertaken, these are identified as Viewpoint Number NN1 – NN13. A series of photomontages have been produced to show the effects of the Scheme at locations where significant effects were considered likely to occur. Locations of the required photomontages and Accurate Visual



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Representation (AVR) were agreed with the Landscape Officer representatives for North Northamptonshire and Milton Keynes City Council. A total of 26 AVR level 3 montages have been produced using summer and winter photography as illustrated in Figure series 8.14 [APP-334 to APP-400], and as set out within Table 8.6 of the LVIA. Of the Viewpoints produced, VP9 is located on PRow NN DG 2#2 (TP090) located alongside Rectory farm to the south of Site B. VPNN2 (Photography and photomontage) is located to the north of Site B on the southern edge of Holcot on PRow NN CW 1 (TP086). VPs 6, 7 and 8 are located either within or immediately alongside Site B.
HoPC-011	Landscape and Visual Impact	Grange Farm and Rectory Farm viewpoints	Viewpoints should be included for Grange Farm and Rectory Farm to the south (off of the A43), and for all residential properties on Sywell Road to the North. (Table 7.2 Page 128)	Please see response to HoPC-010.
HoPC-012	Landscape and Visual Impact	Photomontages	Photomontages from visual locations where significant effects are not predicted should be included. (7.7.7 Page 135)	Please see response to HoPC-010.
HoPC-013	Human Health	Non-economic impacts	Chapter 18 does not propose assessment of the non-economic impacts on people's lives from a major development of this nature	The assessment in ES Chapter 18: Human Health [APP-055] considers a wide range of health determinants beyond economic impacts. These include changes to social



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			(eg; rurality – people live in rural settings mostly through choice). Assessment of this nature should be included. (Chapter 18 Page 288)	demography, physical health and wellbeing, social and health infrastructure. In direct consideration of rurality and people's association with where they live is the assessment of ' <i>community identity, culture, resilience and influence</i> ', which considers how the Scheme impact on community wellbeing, sense of place, and the extent to which residents feel they can shape their physical surroundings. The assessment considers that the Scheme is anticipated to have no greater than a long-term, but temporary, minor adverse effect (during construction and in the 5-10 years that follow) – which is not significant.
HoPC-014	Other Environmental Matters	Topics scoped out	9. Pages 200-201, Table 10.4 of the SR (ground contamination) proposes to exclude matters which should, in our view, be included in the ES. Ditto pages 349 - 350, Table 24.1 (topics proposed to be scoped out) (see further below) Further, with reference to Table 10.4, - page 351 likely significant noise and vibration effects related to the operation of the BESS should be assessed. - page 351 glint and glare – the likely significant effects on public rights of way used by those on horseback (and	<u>Ground Conditions</u> The Applicant would refer the responder to ES Chapter 22: Ground Conditions and Contamination Revision A [EX1/GH6.2.22_A] which sets the scope of the chapter which was based on the Scoping Opinion [APP-075]. <u>Noise and Vibration</u> The Applicant would refer the responder to ES Chapter 14: Noise and Vibration [APP-051] which sets the scope of the chapter which was based on the Scoping Opinion [APP-075]. The impacts from the BESS are assessed in this chapter. <u>Glint & Glare</u>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			equestrian facilities), plus the two nearby Airfields in particular Sywell Aerodrome but also Pitsford should be assessed. Sywell has significant air traffic movements making the potential for glare a major safety issue. • page 351 likely significant effects from electromagnetic fields and ionising radiation arising from BESS, substations, transformers and PV inverters during operation should be assessed. • pages 351-352 human health – community safety impacts from risk of fire and contamination (and radiation) should be assessed (see further below). • page 352 arboriculture – likely significant effects on trees in Sites A-G and BESS should be assessed (see further below). • page 352 other environmental matters – likely significant effects of light pollution, potential accidents and	The assessment considered receptors along Public Rights of Way (PRoW) and horse facilities. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors, rather than the amenity. As outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.21, 15.4.45 and 15.4.54 the sensitivity of PRoW and horse facilities have been categorised as 'low', and the maximum magnitude of impact for PRoW and horse facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. The ES Chapter 15 Glint and Glare [APP-052] has considered the impact of glint and glare at nearby aviation receptors, including Sywell Aerodrome as set out in ES Appendix 15.11 Sywell Aerodrome Aviation Receptor Results [APP-165]. It concludes that a 'moderate impact and therefore significant moderate effect' is predicted towards receptors at Sywell Aerodrome from tracking panels in Green Hill C and Green Hill B in section 15.8.56 of ES Chapter 15 Glint and Glare [APP-052]. The findings of the assessment were shared with an Aviation Specialist to understand additional mitigation options. The Aviation Specialist has provided a review of empirical evidence collected from aerodromes near to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			disasters should be assessed. (Light pollution, moreover, should, we consider, be the subject of a separate chapter and not simply referred to, without detailed assessment, in the L&V chapter. With reference to the foregoing, we feel that - the uncertainty around the siting (and number) of BESS and the associated transformers of differing sizes in the scoping report is unacceptable.	existing solar farms in Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes [APP-572]. In light of the Aviation Specialist's views that the modelled results would not result in a significant impact on the aviation receptors in practice, it was concluded that no additional mitigation measures were required towards aviation receptors at Sywell Aerodrome in section 15.9.2 to 15.9.4 of The ES Chapter 15 Glint and Glare [APP-052] and section 4 in Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes [APP-572]. <u>Electromagnetic Fields</u> As part of our scoping work, we undertook an electromagnetic fields assessment. The conclusions of the assessment in ES Chapter 21 Electromagnetic Fields [APP-058] were that the electrical equipment would not generate high enough electromagnetic fields to require further investigation work or mitigation. <u>BESS safety for Human Health, Arboriculture and Other Environmental Matters</u> Please refer to the Applicants Response to 'EMPM-009' above.
HoPC-015	Ground Conditions	spillages or leakages of fuels and chemicals	In the context of the local rural environment these are large and potentially hazardous installations requiring an	The Applicant notes this comment. ES Chapter 22 Ground Conditions and Contamination Chapter Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			extensive industrial setting. o With reference to the guidance for applicants quoted above, we regard this as 'a high level of uncertainty... around key design elements of the Proposed Development'. o Therefore, we feel it is unreasonable to scope out any risk of 'ground contamination ...spillages or leakages of fuels and chemicals... leaching of chemicals from faulty battery incidents (fire damage, ash deposition and extinguishing waters)' in the construction, operational and decommissioning phases. Despite industry safety measures, battery failure, fire and explosion are well documented in BESS worldwide, and the siting of the BESS in relation to features of the built and natural environment (and people) could be critical. For example, proximity to ancient woodland, crops and watercourses. Of particular concern is the fact that the proposed site B drains down to Pitsford Reservoir any BESS sited	[EX1/GH6.2.22_A] has included a full assessment and provided mitigation measures specific for the spillages and leakages of fuels and chemicals, and for the leaching from faulty batteries (including fire damage, ash deposition and extinguishing waters). Assessment has been considered across the construction, operation and decommission phases of the scheme. See Section 22.7 Embedded Mitigation Measures and Section 22.8 Assessment of Impacts and Effects therein. The Applicant has commissioned a comprehensive OBSSMP Revision A [EX1/GH7.7_A] to prevent and fully mitigate the risks from a BESS failure event. The Safety Objectives are listed in Section 2.4 of the OBSSMP. In accordance with Requirement 6 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A], the relevant planning authority must consult with Northamptonshire Fire and Rescue Service and the Environment Agency before approving the detailed BSSMP, ensuring that any developments as to best practice will be taken into consideration. As recommended in National Fire Chiefs Council (NFCC) draft revised guidelines (2024) the Applicant commissioned a Plume Analysis study BESS Fire Emissions Modelling Report [APP-167] to assess the environmental impact of a BESS thermal



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			here could drastically affect our water supply.	runaway incident to sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility to the local road network. The Plume Study concludes that there are no significant impacts on sensitive receptors.
HoPC-016	Glint and Glare	Sensitivity of local roads, horse facilities and PROW users	as regards Glint and Glare (Chapter 15), we do not agree with the contention that the sensitivity of 'local roads, horse facilities and PROW' should be regarded as 'low' (page 252, Table 15.1). Nor do we agree that 'glare coinciding with direct sunlight' (page 251, para 15.4.11) is a mitigating factor. For example, depending on the geometry, a walker, driver or	The assessment considered receptors along Public Rights of Way (PROW) and horse facilities. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors, rather than the amenity. For the reasons outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.21, the sensitivity of PROW and horse facilities have been categorised as 'low', and the maximum magnitude of impact for PROW and horse



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			equestrian might deliberately look away from the sun only to be met by reflected glare from solar panels. That cannot sensibly be regarded as mitigation. The applicant states (page 257, para 15.4.56) that 'The reflection intensity for solar panels is similar to common outdoor sources of solar reflection (e.g. still water)'. We consider that solar reflection from still water can be a very significant source of glare and therefore the extensive addition of its equivalent to our local environment where it has never previously existed should be scoped in for all local receptors.	facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. The assessment considered receptors on local roads. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors, rather than the amenity. For the reasons outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.19, the sensitivity of local roads has been categorised as 'low', and the maximum magnitude of impact for local roads is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. It is outlined in the ES Chapter 15 Glint and Glare [APP-052] that where impacts from glint and glare are predicted, application of professional judgement and consideration of additional considerations are undertaken to determine the residual magnitude of impact. This includes the consideration of the sun's position relative to the solar array. This is considered when glare is predicted to originate in the same location as the sun, which is a far more significant source of light than reflecting panels. This is not considered as an additional consideration if the glare does not originate in the same space as the sun.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				It is outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.45 that 'the reflection intensity for solar panels is similar to common outdoor sources of solar reflection'. This is considered within the chapter when determining the maximum magnitude impact of 'low' towards users of PRoW, horse facilities, and agricultural workers. This is to highlight that the reflection intensity is commonly found in the natural and built environment. Whilst it is noted that the Scheme will introduce further reflections in the environment, it is not expected to be of higher intensity than those already experienced. As such, it is expected that users of PRoW, horse facilities, and agricultural workers will already have mitigation factors in place that will reduce the impact of glint and glare (e.g. tinted eyewear). Furthermore, as the intensity of reflection is likely to be comparable to existing sources, it is considered that there is not an increased safety risk from these reflections.
HoPC-017	Arboriculture Major Accidents and Disasters	Potential impacts scoped out	as regards Impacts on trees in Green Hill A-G and BESS (Chapter 20), the applicant has requested that these potential impacts should be scoped out because of the 'embedded mitigation of designing the scheme... and further mitigation that will be included	Impacts to non-ancient and non-veteran trees at Green Hill A-G and BESS were scoped out of Environmental Statement e.g. ES Chapter 19 Arboriculture [APP-056] , however, impacts to all trees at Green Hill A-G and BESS were assessed and summarised in supporting documentation: ES Appendix 19.2 Arboricultural Impact



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			within the OCEMP'. (20.7.1-3 and Table 20.4). Whilst we note the intended mitigation, proposed trees will take many years to grow. We consider that the nature and extent of the proposed loss need to be assessed, as well as the proposed mitigation measures. As regards other environmental matters (Chapter 22), the applicant identifies a number of major accidents and disasters which could occur (e.g. BESS fire and explosion) and argues that these will addressed though existing technical assessments and plans such as the Outline Battery Safety Management Plan. It further states that the 'design of the Scheme will evolve during preparation of the DCO application' and that where risks had not previously been identified the design team will address them as necessary through the design process. It argues therefore such major accidents or disasters should be scoped out from the ES. (page 337, para 22.4.5 and Table 22.2). We don't accept this argument and consider that they should be scoped in. Unless the likely	Assessment and Outline Arboricultural Method Statement [APP-171]. Major accidents and disasters are assessed in ES Chapter 23 Major Accidents and Disasters [APP-060]. The DCO Application is supported by an OBSSMP Revision A [EX1/GH7.7_A] which details key fire safety provisions for the BESS proposed to be installed at Green Hill Solar Farm (Green Hill BESS and Green Hill C) including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. As part of the BSSMP to be prepared prior to construction of the BESS, the Applicant will take into account the latest good practices for battery system failure prevention and detection, consequence modelling, risk analysis, and emergency response planning, as guidance continues to develop in the UK and around the world.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			significant environmental effects are assessed, the appropriateness of any proposed mitigations cannot be assessed.	



5.9 Lavendon Parish Council

Table 5.13: [RR-1230](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LaPC-001	Alternatives and Design Evolution	Three Shires Wood	GREEN HILL SOLAR FARM – LAVENDON AND WARRINGTON COUNCILS' QUERIES CONCERNS The Solar farm site is currently open arable countryside crossed by the Three-Shire Way, an ancient trackway and well-used route for walkers, riders, and cyclists. In places, the development adjoins the Three Shires Woods, an ancient woodland site which, albeit not subject to any statutory designation, hosts a range of protected fauna and features a mature population of oak trees, with a rich understorey of hazel coppice, hawthorn and a woodland floor covered in ancient woodland indicator species.	The Applicant's site selection process, including a search for suitable brownfield land, has been undertaken and presented as part of ES Chapter 5 Alternatives and Design Evolution [APP-042] and ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] of the Environmental Statement. Impacts on the Three Shire Way are set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A], which identifies a significant adverse effect to users of the Three Shire Way due to direct impacts from the construction of Green Hill G. The Applicant has committed to mitigation measures to limit the impacts to users of this route during construction, and has committed to providing an enhanced user experience during the Scheme's operational lifetime. The LVIA has undertaken an assessment of sequential effects to users of the Three Shires Way as well as its individual sections of PRoW that make up the route; MK Lavendon 015#1 (TP240) MK Lavendon 015#2 (TP227), MK Lavendon 002 (TP217).



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				This Route leads north from Lavendon Grange, crosses the A428 and then enters Site G. The Route passes underneath the high voltage transmission line and continued up through Site G and alongside the western edge of Threshire Wood before it enters The Oaks Wood and continues north across open countryside. Sequential Effects for users of these Recreational Routes are not considered to be any greater than those effects identified for the individual sections as set out within Appendix 8.3 ES LVIA Assessment Sheets [EX1/GH6.3.8.3_A], this being Significant Adverse Effects to users of these routes until the establishment of the landscape mitigation by Year 15, at which point there are no Significant Residual Effects.
LaPC-002	General Matters	Introduction	At this stage, Lavendon Parish Council (the 'Council' hereafter) is not opposing the proposed solar farm scheme and has chosen instead to constructively engage with Island Green Power (the 'developer' hereafter) to convey valuable anecdotal knowledge, any community's concerns and, ultimately, influence the design process to secure the best outcome for both people and wildlife.	The Applicant notes this comment and welcomes the Council's commentary and input, to which the Applicant has responded to on a topic-by-topic basis below.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LaPC-003	Alternatives and Design Evolution Consultation	Design iterations at previous consultation stages	In March 2025, the Council submitted a response to the consultation sharing a few key points of concerns (listed again to follow) and a GIS plan identifying sensitive areas and, accordingly, proposing modifications to mitigate against ecological, visual and flood risk impact. Namely, the Council proposed the exclusion of 2 land parcels and the inclusion of hedgerows, to suitably buffer valuable ecological receptors and improve wildlife connectivity site-wide. However, to this day the Masterplan for Site G does not appear to reflect any of the proposed changes. The Council recognises that the preparation of a planning application of this scale involves the review of multiple assessments to inform a definitive layout, and therefore appreciates that the proposals are likely to be revised only once the results of all investigations have been duly reviewed. On this basis, we assume that the Council's proposed changes may be implemented at once with the recommendations made by other consultants and consultees.	The Applicant acknowledges this comment but remains confident that the proposed mitigation within Green Hill G is sufficient.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LaPC-004	Ecology and Biodiversity General Matters	Updated assessment work	That being said, the Council is now seeking clarification on the following: Which assessments have been brought forward following the publication of the preliminary appraisals? Have secondary surveys targeting protected species deemed at risk from development been instructed, and if so, when are the results expected to be published?	The Environment Statement [APP-038 to APP-064] as well as its supporting appendices [APP-065 to APP-189] and figures [APP-190 to APP-544] outline the Applicant's assessment of likely significant effects. All secondary surveys have been completed. Species-specific survey methodologies and results are provided in the technical appendices associated with ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Please refer to [APP-088 to APP-094] inclusive for survey information relating to badgers, bats, otters and water voles, breeding birds, wintering birds, and arable weeds.
LaPC-005	Hydrology, Flood Risk and Drainage	Updated assessment work	Have bespoke visual impact and flood risk assessments for site G been instructed, and if so, are they being undertaken?	The Applicant notes the request. Flood risk at Site G has been fully assessed in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and the supporting FRADS Annex I: Green Hill G [APP-107]. These confirm that the site is at low risk of flooding, that runoff will be managed through sustainable drainage measures, and that there will be no increase in flood risk to third parties.
LaPC-006	Alternatives and Design Evolution Consultation	Design iterations at previous consultation stages	Has our response to the consultation, accompanied by drawings, been acknowledged and can the Council expect that the proposed changes will be considered in future design iterations? The key issues already raised by the Council in the response to the	Any feedback received from Consultation has been reviewed and changes to the Scheme where necessary as set out in the Consultation Report Revision A [EX1/GH5.1_A] and its accompanying appendices [APP-024 to APP-036]. The Design Approach Document [APP-560] sets out how the design has evolved including how it has been influenced by planning policy and stakeholder engagement;



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			consultation, along with other concerns gathered through community engagement, are outlined to follow.	and the proposed outline design solution including access. ES Chapter 5 Alternatives and Design Evolution [APP-042] describes the consideration of alternatives and design evolution in relation to the Scheme.
LaPC-007	Ecology and Biodiversity	Baseline and Three Shires Wood	Ecology The proposed development area is dominated by intensively farmed arable land, which nonetheless provides suitable habitat for farmland birds, including skylarks. While the range of species observed in a predominantly arable landscape is limited, wildlife activity within and around the edges of the Three Shires Woods (ancient woodland) is more notable and includes badgers, bats, and birds. The Preliminary Ecological Appraisal identified the presence of notable populations of skylarks and bats; furthermore, the presence of several badger sett within the adjoining Three Shire Woods is known and documented. Accordingly, the Council expects proposals to incorporate effective mitigation measures for the safeguarding of these, through habitat retention, enhancement and creation. Without effective mitigation in place, the development is likely to	A protective ecological buffer of 30m has been applied to all ancient woodlands within or adjacent to the Order Limits, including Three Shires Wood, in order to avoid impacts on these habitats. Full details of avoidance and mitigation measures required to safeguard existing ecological features such as badger setts, ancient woodlands and bats are provided in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Please also refer to the Applicant's response to CRNBPC-004 for details on habitat retention, creation and enhancement in Green Hill G.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			negatively impact on species richness and relative abundance.	
LaPC-008	Landscape and Visual Impact	Visual impact	Visual impact The scheme will have significant visual impact as viewed from Three Shire Way and some areas of the village. To this end, the Council expects effective boundary planting to be included in the proposals, as well as extensive buffer areas along the existing woodland edges (in particular, along the Three-Shire Way), to ensure effective visual screening. The Council has already made concrete proposals for the exclusion of two fields from the development, to reduce the visual impact and provide additional safeguarding for wildlife. At this point in time, as already stated above, these proposals do not feature in the Masterplan for Site G.	The ES Chapter 8 Landscape Visual Impact Assessment [APP-045] assess views of the array from PRoW. This includes the individual sections within and surrounding Site G that make up the corresponding section of the Three Shires Way within the Site: MK Lavendon 015#1(TP240) ; MK Lavendon 015#2 (TP227); MK Lavendon 002 (TP217), and NN TA 8 (TP202) located beyond the Site to the north of The Oaks Wood. Please refer to ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] for details on Visual Assessment. The LVIA identifies Significant Adverse effects for users of those PRoW within the Site itself up until the establishment of the proposed mitigation planting. However, given the containment provided by The Oaks Wood, Threeshire Wood and Nun Wood, for users of the Three Shires Way to the north of the Site, there would be some Minor Adverse effects at the point of entering the Site, but these would not be significant. The LVIA includes an assessment of the Cumulative Effects of the Scheme, including an assessment of sequential effects, where different Sites are revealed in succession as a series of sequential views. The LVIA found that Sequential Effects are not considered to be any



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				greater than those effects identified for the individual sections as set out within ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A]. The ES Chapter 8 Landscape Visual Impact Assessment [APP-045] assess views of the array from residential properties within the settlement of Lavendon (RS16), recognising that there would be potential for glimpsed views of panels within GF13 from properties on the edge of the village. However, given the juxtaposition of the Scheme from the settlement there would be limited intervisibility to and from the village itself, with visibility restricted to outlier properties such as Lower Farm (RI93) and Castle Farm (RG54). Given this separation and overall limited intervisibility the LVIA does not identify any Significant adverse effects on views from private residential properties within the settlement of Lavendon but does identify Significant Adverse effects upon occupants of Lower Farm until the establishment of the mitigation planting. Please refer to ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] for details on Visual Assessment. The iterative design of the Scheme has utilised a series of buffers that have been embedded into the design which are outlined in Table 8.8



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				of the ES Chapter 8 Landscape Visual Impact Assessment [APP-045]. These buffers have been embedded into the design of the Scheme and are embedded into the Landscape and Ecology Mitigation Plans [APP-207]- [APP-219]. Notable buffers include: 50m from the curtilage of Residential Properties, 30m from Ancient Woodland, 20m from Woodland, 15m from all hedgerows, and 15m from PRow. This 15m PRow buffer helps maintain openness along the route of PRow and provides opportunities for screening through the use of additional planting. This includes the provision of 15m buffers from either side of a PRow to create a 30m wide corridor between fence lines maintaining their setting and openness. The Landscape and Ecology Mitigation Plan for GH Site G [APP-219] has been iteratively designed to provide new Green Corridor and Woodland Planting, Enhanced Riparian Native Planting, Hedgerow Reinforcement & Reinforced Roadside Vegetation, Proposed Hedgerows, and extensive areas of Groundcover. Please refer to ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] Green Hill Site G: Landscape Fabric for details on specific quantities, and the Landscape and Ecology Mitigation Plan for GH Site G [APP-219]. The design for Site G utilises the existing landscape framework provided by the field,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				watercourse and roadside hedgerows. The approach to mitigation has been to reinforce the existing hedgerows to provide greater enclosure to the Site and provide screening of the infrastructure. New native woodland copses and shelterbelts are proposed alongside the watercourse and the PRoW running through the centre of the Site. Other smaller field ditches are also to be enhanced, such as alongside GF11 and GF7 and GF5. New riparian planting has been proposed to enhance these features as they pass through the Site. The approach at Site G has been to build upon and reinforce the existing field boundary vegetation with new trees to help bring greater species diversity and age depth to the tree stock whilst supporting the key characteristics of the LCT1 Wooded Wolds, LCA1a Yardley Chase Wooded Wolds; and LCT2 Undulating Valley Slopes, LCA2a Ouse Northern Undulating Valley Slopes. Water corridors have also been accentuated to create meaningful habitats and defining features, particularly through the middle of the Site. Impacts on the Three Shire Way are set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A], which identifies a significant adverse effect to users of the Three Shire Way due to direct impacts from the construction of Green Hill G. The Applicant has committed to mitigation measures to limit the impacts to users of this route during construction, and has committed to providing an



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				enhanced user experience during the Scheme's operational lifetime. This is done through providing a >30 m buffer to the Three Shire Way along much of its route through Green Hill G, addition of hedgerow screening to limit short-range views of the solar array areas, planting of tussocky grassland to enhance ecology and biodiversity next to the route, and providing upgraded permissive links for pedestrians to footpath Lavendon 005 towards Northey Farm. These are all shown on ES Figure 4.20: Green Hill Site G Landscape and Ecology Mitigation Plan [APP-219] and secured through the OLEMP Revision A [EX1/GH7.4_A] which itself is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] .
LaPC-009	Hydrology, Flood Risk and Drainage	Flood risk to Lavendon	Flood risk The area of the solar farm is part of an area identified by Milton Keynes City Council as a critical flood risk catchment area. The current PEIR concerning flooding solely focusses on the site itself and does not consider the cumulative effects that the Solar Farm may have alongside other existing risks. Lavendon experienced major flooding events in 2020 and 2024, arising partially from surface water runoff from the proposed solar farm site. To this end, the Council has proposed the	The Applicant notes the comments regarding flood risk to Lavendon. Flood risk at Site G has been assessed in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and the FRADS Annex I: Green Hill G [APP-107]. In accordance with the National Policy Statements EN-1 and EN-3, the National Planning Policy Framework and Planning Practice Guidance on Flood Risk and Coastal Change, and best practice in CIRIA C753: The SuDS Manual, the Scheme has been designed so that flood risk is not increased beyond the Order Limits. Runoff is restricted to greenfield rates (with betterment in the 1- and 2-year events), attenuation and exceedance routing are provided within the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			exclusion of the southernmost field from PV installation, alongside nature-based solutions (planting) that may alleviate flood risk. It is also important to note that Milton Keynes Borough Council are developing a Flood Alleviation Scheme which will involve the development of attenuation basins/bunds at identified locations around the village. Accordingly, the Council is seeking reassurance that the proposals will take account of this overlapping scheme and review the design accordingly.	Order Limits, and the final scheme is secured through Requirement 11 of the Draft DCO Revision A [EX1/GH3.1_A]. On this basis there is no pathway for cumulative off-site flood risk effects, as each development must be hydraulically neutral to achieve consent under national planning policy. The majority of the Scheme comprises solar panels. As demonstrated by Cook & McEwan (2013) and the BRE National Solar Centre Good Practice Guidance for Solar Farms (2014), solar panels themselves have negligible impact on catchment hydrology because rainfall continues to infiltrate between and beneath rows, with drip lines dispersed across vegetated ground. The principal risk arises from soil compaction during construction and along access routes, not from the presence of panels. This was assessed in the ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A], which identifies soil compaction as the key risk to permeability. Embedded mitigation is secured through the OCEMP Revision A [EX1/GH7.1_A] and the OSMP [APP-550], which require soil protection, reinstatement and appropriate construction methods to preserve infiltration capacity. With these measures in place, the Environmental Statement concludes there will be no significant flood risk effects. Furthermore, the proposed change of use from intensively managed arable land to managed



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				grassland beneath and between arrays is expected to improve the hydrological baseline. Natural England TIN101 (2011) and Environment Agency research on agricultural soils confirm that cultivated arable land is often compacted, has reduced infiltration and generates higher runoff. Conversion to grassland typically improves soil structure and infiltration, reducing surface runoff compared with the agricultural baseline. The Applicant will continue to liaise with Milton Keynes City Council to ensure that the final drainage design is coordinated with any proposed Flood Alleviation Scheme for Lavendon, but the Scheme's drainage strategy is hydraulically independent and ensures no increase in flood risk to the village or third parties.
LaPC-010	Alternatives and Design Evolution	Panel types	Other consideration In addition to the above, a review of the PEIR documents has led to the following queries. Panel type The PEIR non-technical summary quotes that the development will adopt a mixture of tracking and fixed panels, the height of which is 4.5m and 3.5m, respectively. The Council is keen to understand whether the deployment of both technologies within the same site is contemplated, and if so, if it is fair to assume that fixed panels would be used in areas	The flexibility to use either fixed or tracker panels is set out in the ES Chapter 4 Scheme description [APP-041]. It is unlikely that a mixture of the two types would be used in one site due to added complexity of construction, however this would be confirmed at detailed design stage if the application was consented. The max height of 4.5m is assessed in the LVIA and represents the worst case scenario.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			where visual impact is of greater concern.	
LaPC-011	Other Environmental Matters	Lighting	Lighting The PEIR non-technical summary (page 12) also references 'lighting' under 'Associated infrastructure'. As lighting typically does not feature in solar farm schemes, we would like clarification as to whether any of it would be comprised in Site G, and if so, where specifically. For the avoidance of doubt, the Council is likely to oppose lighting schemes that may result in permanent light pollution from nighttime illumination	Details on fencing, lighting and security can be found in ES Chapter 4: Scheme Description [APP-041] and the CDPP Revision A [EX1/GH7.17_A]. These elements are secured by Requirement 5, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. During the Scheme's operation, no onsite lighting will be used for the solar array areas. The ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] considers that for some aspects of the Scheme (the construction stages in particular), the visual effects of lighting may be an issue. During operation stages, the LVIA sets out that mitigation would assist new planting along the boundary of substations and energy storage areas to filter the presence in the landscape and provide softening and screening. Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Corridor, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning.
LaPC-012	Community Benefits Ecology and Biodiversity	Habitat creation	Habitat creation The PEIR non-technical summary lists Site reinstatement and habitat creation as the last stage of development. While it is accepted that this stage fist organically at the end of the construction process, the Council would welcome screening planting to be implemented at the earliest opportunity upon commencement of the construction phase, where construction activities allow. This would give vegetation more time to establish, thereby delivering better mitigation for visual impact during the operational phase.	The Applicant notes this comment and refers to ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] for details of habitat creation, particularly with regards to screening, as well as the OLEMP Revision A [EX1/GH7.4_A]. Habitat creation and management measures therein would be secured through Requirement 7 - Landscape and Ecological Management Plan in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. In accordance with the OLEMP, planting is intended to be undertaken in the planting season (between October and March) during construction (where feasible), or within the first available year/planting season post construction. This is to ensure that the newly created habitats are not damaged during the construction phase, and to allow for the proper preparation of the ground post-construction, prior to planting taking place.
LaPC-013	General Matters	Repeated commentary	Lavendon Parish Council Response – Proposed Solar Farm, Site G The proposed solar farm is located within currently open arable countryside traversed by the Three-	The Applicant notes that these comments largely repeat the comments made above. Please therefore refer to responses to LaPC-001 to LaPC-012 above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Shire Way, an ancient trackway and a popular route for walkers, riders, and cyclists. In parts, the development borders the Three Shires Woods, an area of ancient woodland. Although this woodland is not subject to any statutory designation, it supports a variety of protected fauna and features a mature oak population, underlain by hazel coppice, hawthorn and other native shrubs, and a woodland floor rich in ancient woodland indicator species. At this stage, Lavendon Parish Council (hereafter 'the Council') is not opposing the scheme. Instead, it has opted to constructively engage with the developer by contributing anecdotal local knowledge, communicating community concerns, and ultimately seeking to influence the design process to achieve the best possible outcomes for both people and wildlife. In March 2025, the Council submitted a formal consultation response. This response included a series of key concerns (reiterated below) and a GIS plan identifying sensitive areas and proposing modifications to mitigate ecological, visual, and flood risk impacts. Specifically, the Council	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			recommended the exclusion of two land parcels and the addition of hedgerows, intended to buffer valuable ecological receptors and enhance site-wide wildlife connectivity. As of the time of writing, the Masterplan for Site G does not appear to incorporate these recommendations. The Council recognises that the preparation of a planning application of this scale necessarily involves reviewing multiple technical assessments to inform a definitive layout. On this basis, it is understood that revisions to the proposals may follow once all survey results and inputs from consultants and statutory consultees have been fully considered. It is therefore assumed that the Council's proposals will be evaluated in conjunction with those provided by other stakeholders. Outstanding Queries the Council now seeks clarification on the following points: 1. Assessment Status Which technical assessments have been undertaken since the publication of the Preliminary Ecological Appraisal and Preliminary Environmental Information Report (PEIR)?	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			2. Protected Species Surveys Have any secondary or targeted surveys been commissioned for protected species potentially affected by the development? If so, when are the results expected to be published? 3. Site G-Specific Assessments Have bespoke visual impact and flood risk assessments for Site G been commissioned, and are these surveys currently underway? 4. Consultation Response Acknowledgement Has the Council's consultation submission, including the associated GIS plans, been formally acknowledged by the developer? Will the proposals therein be considered in future design iterations? Key Issues Raised 1. Ecology The development area comprises intensively farmed arable land, which nonetheless provides potential habitat for farmland birds, including skylarks. While overall biodiversity in such landscapes is often limited, the edges and interiors of Three Shires Woods exhibit greater ecological value, supporting badgers, bats, and various bird	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			species. The Preliminary Ecological Appraisal alludes to the presence of notable skylark populations and bat activity. Additionally, the existence of multiple badger setts within Three Shires Woods is known and documented. The Council therefore expects that the proposals will include effective mitigation, through a combination of habitat retention, enhancement, and creation. Without such measures, the development poses a risk of reducing local species richness and abundance. 2. Visual Impact The scheme is likely to have significant visual impacts from both the Three-Shire Way and various points within the village. To address this, the Council expects the incorporation of: • Robust boundary planting to visually soften the development; • Extensive buffer zones along woodland edges (particularly adjoining the Three-Shire Way); and • The exclusion of two fields to reduce visual and ecological impacts. At present, these measures do not appear to be reflected in the Site G Masterplan.	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			3. Flood Risk The site lies within an area identified by Milton Keynes City Council as a critical flood risk catchment. The PEIR's focus on site-level flood risk but fails to account for cumulative impacts, especially given the area's known vulnerability. Lavendon experienced major flood events in both 2020 and 2024, which were partly attributed to surface water runoff from the proposed solar farm area. To address this issue, the Council has proposed, and would welcome the developer's views on the following: • Exclusion of the southernmost field from PV deployment; and • Integration of nature-based solutions such as tree and hedge planting to improve water retention. It is also essential that the proposals account for Milton Keynes City Council's forthcoming Flood Alleviation Scheme, which is expected to deliver attenuation basins and bunds around the village. The Council seeks assurance that the solar farm design will be compatible with this overlapping initiative. Additional Considerations Panel Technology the PEIR Non-Technical	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Summary states that a combination of tracking (4.5 m high) and fixed (3.5 m high) panels is proposed. The Council seeks clarification on whether both panel types will be deployed within Site G and, if so, whether fixed panels will be preferentially located in visually sensitive areas. Lighting The same summary also references 'lighting' under "associated infrastructure". As lighting is typically not a feature of solar farm installations, the Council seeks clarification as to whether any lighting is proposed within Site G, and if so, its location, type, and operational times. For the avoidance of doubt, the Council is likely to oppose permanent lighting schemes that may cause light pollution, particularly in proximity to ecologically sensitive areas. Habitat Creation While it is accepted that habitat creation typically follows the construction phase, the Council requests that screening vegetation (e.g., hedgerows or shelter belts) be implemented at the earliest opportunity, where construction activities allow. Early planting will allow vegetation to establish and provide more effective visual	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			screening during the operational lifespan of the site.	
LaPC-014	Consultation	Continued consultation or dialogue	Please do not hesitate to contact the Council should further detail or clarification be required in support of the above representations. We look forward to a meaningful and transparent dialogue as the proposals progress.	The Applicant notes the comments.



5.10 Mears Ashby Parish Council

Table 5.14: [RR-1232](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MAPC-001	General Matters	Introduction	Response on behalf of Mears Ashby Parish Council. Having taken numerous steps to consult residents within the parish, the council would submit the following concerns and objections to the proposed Green Hill Solar Farm. The council seeks that the full contents of the following (linked) documents are fully considered and taken into account when determining this matter. 1 Mears Ashby Design Statement 2 Parish Council response to scoping consultation 3 Parish Council response to Statutory consultation 4 Parish Council response to Targeted Consultation 5 Mears Ashby Hall Impact Assessment.	The Applicant notes this comment and has responded to the parish council's objections on a topic-by-topic basis below.
MAPC-002	Energy Need and Policy Alternatives and Design Evolution	Design policy	https://mearsashby-pc.gov.uk/wp-content/uploads/2022/10/VDS_adopted_Feb_2017-2.pdf This Village Design Statement (VDS) forms part of local planning regulations and seeks to reflect the wishes of the inhabitants of Mears Ashby, providing guidance as to how the village and its surrounds should develop in relation to the design of any future development. Following a period of promoting awareness of the value of such a document, including an open meeting in the village hall sponsored by the Parish Council, a detailed questionnaire was delivered to 215 households seeking views on the important aspects of design and	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] , has assessed potential impacts as a result of the scheme to heritage assets within Mears Ashby. Embedded mitigation in the form of removal of solar panels from Fields DF4, EF9, EF16, EF34 Offsets (Fields DF1 to DF3, EF4 EF5, EF10-EF15, EF17) and enhanced screening of existing hedgerows and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area, have



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			character within the village and Parish. Everybody in the Parish from teenager upwards was invited to submit a response - in total 119 responses were received. Together with a thorough desktop and field assessment of the character of the Parish, including a recently produced Conservation Area Appraisal, the Parish Council, were then able to identify a list of appropriate guidelines that reflect both the aspirations of residents and the defined character of the village and the Parish. There are three distinct geographical areas covered by the recommendations in this document: the conservation area in the centre of the village, the remaining village and then the outlying area within the parish boundary. Whilst this VDS covers the entirety of Mears Ashby Parish it provides the most extensive level of guidance around the preservation and enhancement of the conservation area covering the village core. Much of this guidance picks up on the detailed observations made within the Conservation Area Appraisal. The protection of the intrinsic rural setting and open green spaces within the village is seen by the inhabitants as being extremely important. Therefore, where development does occur, many of the key areas of guidance included in this VDS will seek to ensure that development is designed to fit the traditional, rural village setting that has prevailed here for centuries. The design guidelines applicable to	been designed to reduce impact. It is assessed that a Moderate adverse effect would occur to Mears Ashby Conservation Area as a result of the Scheme following the embedded mitigation (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]).



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the village can be found in the highlighted boxes and supported by illustrative material where appropriate. Together, they are intended to ensure that the appearance and quality of build in the village and its environs respects and reflects the elements of Mears Ashby that lend themselves to its rural charm and cherished character. The Parish Council strongly objects to the size and location of this proposed development, being contrary to the design statement guidelines and objectives.	
MAPC-003	General Matters	Response to Scoping	https://mearsashby-pc.gov.uk/wp-content/uploads/2024/09/response-to-scoping-consultaion.doc The Council has serious concerns regarding the scoping document for Greenhill Solar Farm, areas C, D, and E. Particularly the following items that have been scoped out: 22.1.1 - it is proposed to scope out of the environmental statement 'Major accidents and Disasters'. The Parish Council consider that the following proposes significant risk and should be scoped in. 1. BESS. The recent amendment is that 'Battery Energy Storage Systems' are to be considered in areas 'C' Wood Lodge Farm, and 'E' the central Mears Ashby area of 550 acres. Battery Storage Systems are notoriously unsafe, liable to catch fire and require hundreds of gallons of water to extinguish. Run-off from such a fire contains significant	The design of the Scheme has been developed iteratively, responding to feedback received through consultation as well as the findings of the assessments reported in the Environmental Assessment. A summary of the evolution of the design of the Scheme is provided in ES Chapter 5: Alternatives and Design Evolution [APP-042], with further detail on the approach to embedding design mitigation into the Scheme set out in section 8.8 of ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]. In respect of the BESS, the design of the Scheme has been refined to provide two potential locations for this, within Green Hill C and Green Hill BESS. The OBSSMP Revision A [EX1/GH7.7_A] explains that the design of the BESS has



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			amounts of pollutants and can contaminate watercourses. Both areas are close to water courses that eventually run into Sywell reservoir at the Country Park. Water pressure throughout the parish is 'Low' and often unreliable due to antiquated, inefficient water tower and associated pipework. There has been occasions throughout recent times when the village has suffered a number of water supply outages due to the inadequate infrastructure. Full consideration must be given to the local services ability to effectively deal with these potential accidents or disasters. 2. 3. Table 24.1 Horse Facilities. Adjacent to Area 'D' is the Equestrian Centre for the sole use of The Hannah Payne Riding for the Disabled Group., Charity No 1119963. patron HRH The Princess Royal. This provides unique and important horse-riding therapy for 3- to 16-year-old children. The Centre, of stables and fields, join up to and are totally overlooked by the first field in Area D. This proposed field has a significant slope bearing down on the field and stables. Horses are notoriously easy to frighten and are animals of flight. The invasion of machinery and noise would put a stop to any riding activity and glint and glare from the panels, once in place, would also spook the horses and their riders. 4. Glint and Glare, only visual receptors scoped in between 1-2km the owners of the stables and fields have their own property, within the same area as the	integrated fire detection and suppression systems that will automatically operate to contain battery fires. It states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds. A full Battery Storage Safety Management Plan will be submitted and approved prior to commencement of development as secured through Requirement 6 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Please refer to the Applicant's response in 'EA-004' above for drainage strategy from BESS Fires. The Hannah Payne RDA has been identified and assessed as a locally important equestrian facility adjacent to Green Hill D in ES Appendix 17.1: Tourism and Recreation Receptor Tables [EX1/GH6.3.17.1_A]. Following direct consultation with the riding school, field DF4 was removed from the solar array area ahead of DCO submission to address their concerns. This has the additional benefit of creating a buffer from onsite infrastructure to the Mears Ashby Conservation Area. The assessment of the riding school finds no greater than a medium-term moderate-minor adverse effect (which is not



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			stables and are approximately 100m from the edge of Area D. The Environmental Impact Assessment report 15.4.27 states the applied distance should be 1km. Glint and glare from the panels on the down slope of Area D, will have a massive impact on the owners. Visual receptors should be scoped in from 0 -2km.	significant) is anticipated during construction. ES Chapter 15 Glint and Glare [APP-052] considered the impacts of glint and glare on receptors including nearby properties, roads and PRowWs. Based on industry guidance, a 1km study area had been identified for ground-based receptors. At distances larger than 1km, the proportion of an observer's field of view that is affected by glare reduces with increased separation distance. Where glare impacts were predicted, guidance published by industry professionals was applied to determine the residual effect towards the modelled receptors.
MAPC-004	Major Accidents and Disasters	BESS fire risks	The council would refer you to the following links to following expressed concerns relating to the fire risk caused by Battery Farms in support of its objections to this proposal: Battery Farms are an 'Emerging Risk', Warns Fire Chief As battery energy storage systems become more common across the UK, fire services are raising concerns about safety. Suffolk's Deputy Chief Fire Officer calls for stronger enforcement powers, while experts warn of the dangers linked to lithium-ion battery fires. Discover why communities and fire professionals alike are keeping a watchful eye on this emerging challenge	The Applicant notes these comments and has commissioned a comprehensive OBSSMP Revision A [EX1/GH7.7_A] to prevent and fully mitigate the risks from a BESS failure event. The Safety Objectives are listed in Section 2.4 of the OBSSMP. In accordance with Requirement 6 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] , the relevant planning authority must consult with Northamptonshire Fire and Rescue Service and the Environment Agency before approving the detailed BSSMP, ensuring that any developments as to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Council Calls for Government Support Over Battery Farm Fire Risks Norfolk County Council is urging the government to fund fire service training and equipment amid growing concerns over the risks posed by large-scale battery energy storage systems. With more battery farms planned across the region, councillors are calling for national safety standards and formal consultation with fire services. East Devon District Council rejects lithium battery facility - BBC News Plans to build a lithium battery storage facility in East Devon have been rejected. Clearstone Energy had asked for permission to build and operate the battery energy storage system (BESS) south of Hazelhurst Raymonds Hill in Axminster. However, planners at East Devon District Council rejected the scheme after a three-and-a-half hour debate which saw residents raise concerns about fire risks and pollution.	best practice will be taken into consideration. As recommended in National Fire Chiefs Council (NFCC) draft revised guidelines (2024) the Applicant commissioned a Plume Analysis study BESS Fire Emissions Modelling Report [APP-167] to assess the environmental impact of a BESS thermal runaway incident to sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility to the local road network. The Plume Study concludes that there are no significant impacts on sensitive receptors.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MAPC-005	Transport and Access	Response to Scoping	Transport and Access. Chapter 13 Environmental Impact Assessment The Council also has concerns regarding the identification of "local routes" to reach Green Hill sites C, D and E from identified SRN and MRN routes. (Paragraph 13.3). Page 222. At paragraph 13.3.8 Highfield Road is identified as a suitable local route to access Green Hill site D notwithstanding that this route is described in the report as, "a single lane rural road with limited passing places". Highfield Road is unsuitable for HGV's and large vehicles with no room to manoeuvre and no passing or turning places. The road has crumbling soft verge and road surface. It is not designed to carry anything other than local traffic. At paragraph 13.3.9 Wilby Road is identified as bisecting Green Hill site E, "and can be used to access Green Hill site E and the A509". Our comments with regards to the suitability of Highfield Road apply equally to Wilby Road. Additionally, Wilby Road has an acute left right bend in a dip which limits visibility and makes it unsuitable for use by HGV's. Such usage would pose a significant risk to other road users. At paragraph 13.3.9 Mears Ashby Road is identified as providing access to Green Hill site E. This road is a major commuter route between the A45 and A43 and has two blind bends at the summit of high ground limiting visibility for road users. The road also has significant agricultural, cycling and pedestrian traffic. The identified	An assessment of construction traffic is provided in ES Chapter 13 Transport and Access [APP-050]. This includes consideration of traffic accident data, and a quantitative and qualitative review of the effects of construction traffic associated with the Scheme. HGV routes have been positively selected to avoid passing local schools. Figures 13.3 and 13.4 [EX1/GH6.4.13.3_A and EX1/GH6.4.13.4_A] also show the Routes to the Scheme for Sites C, D and E. These routes have been discussed and reviewed through desktop studies and site visits with the local highway authorities. Green Hill D and E are both proposed to take access from Highfield Road. Options to facilitate access are detailed in the ES Appendix 13.2 Transport Assessment [APP-151 to APP-153]. This includes improved site access points, options for passing places and the use of a haul road through Green Hill D. Each aspect may be suitable for periods of the construction. Wilby Road is proposed for access between Green Hill E. direct access from Wilby Road by HGVs is not proposed.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			“local routes” would not allow large vehicles to turn to leave by the same route potentially forcing traffic into the village of Mears Ashby and Sywell. At paragraph 13.1(page 222) Fig 1 identifies the local road network lined in black. This includes Highfield Road, Wilby Road and Mears Ashby/Earls Barton Road entering the village of Mears Ashby and being linked by Wilby Road on the Southern boundary of the village and Wellingborough Road on the eastern boundary of the village. Wilby Road and Wellingborough Road are within the curtilage of the village and are subject to weight restrictions. Access is limited due to road width, on street parking and tight bends. They are unsuitable for use by HGV's. The village should not be used as a “rat run” for construction or maintenance traffic as this would pose a significant danger to residents and their property. This would also be a significant increase in the risk of accident around the primary school area. Linking Highfield Road to the other major artery, Earls Barton Road via North Street, along which numerous young children make their way to and from school each day.	Mears Ashby Road is identified as a route that may be used by worker traffic, with HGV movements directed to other routes. The submission includes an OCTMP Revision A [EX1/GH7.9_A] to manage HGV movements, which is secured by Requirement 15, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A].
MAPC-006	Transport and Access	Response to Scoping	The parish council would express its concerns with the overall project and in particular:	The Environmental Statement has assessed the Scheme with a lifespan of up to 60 years. Please refer to Chapter 7: Climate change [APP-044] for the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			1. That there is no analysis of the full cradle to grave impact over the 40-year life cycle of the solar farm. 2. The revenues from the solar farm belong to an organisation that is not based in the UK. 3. Sustainability is not the same as energy security. Whilst the solar farm might create sustainable energy, there is no guarantee that the energy is secure for the duration of the planned life of the solar farm as the offshore legal entity might decide not to sell the energy to the UK grid.	assessment of impacts over the life cycle of the project. Please refer to the Funding Statement [APP-020] for further information on the company structure. Please refer to the applicant's response in 'SAMP-009' above in respect of energy security. The Scheme will connect to the National Grid at the existing National Grid Substation at Grendon, pursuant to a grid connection agreement. Please refer to the Grid Connection Statement [APP-557]. The inclusion of BESS within the Scheme helps to support energy security by storing energy to be released when needed, including to support grid stabilisation.
MAPC-007	General Matters	Response to statutory consultation	https://mearsashby-pc.gov.uk/wp-content/uploads/2024/12/Formal-response-Green-Hill-Farm-statutory-consultaion.pdf 1. The proposed scheme fails to consider priorities set out in the North Northamptonshire Corporate Plan 2022. Item 4. Green Sustainable Environment: To protect the countryside and open spaces. And enhance the natural environment and ecology.	As noted above under reference MAPC-003, the design of the Scheme has been developed iteratively, taking into account the responses to consultation. The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. Details of the process are set out in ES



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			This massive 3,000-acre development, the size and scale of Heathrow Airport, being built in the middle of rural Northamptonshire, surrounding ten rural villages, will not only fail to protect but will considerably and adversely change the countryside amid some of the best wheat growing land in the country. Item 5. Connected Communities: To listen to our communities, giving them a greater say in their future. The council is aware of the many expressions of concern from residents within the community. None the least of these being, bridleways and footpaths that will be changed forever. Corridors between solar panels with high fencing on each side, and security cameras, will create hostile environments which will constrain wildlife in all directions and likely to result in the loss of wildlife habitats for badgers, foxes, deer, and various bird species. It will create no-go areas for dog walkers, hikers, and horse riders. Views will be impeded and do nothing for people's well-being by adversely affecting beautiful open countryside. There will be no opportunities for local employment as all work is specialised. The Natural and Historic Environment: Including the protection, restoration, and enhancement of natural, and historic assets. Provide	Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] of the Environmental Statement. In ES Chapter 5: Alternatives and Design Evolution [APP-042] of the Environmental Statement, the Applicant provided further details on the alternatives that were considered and the design evolution process for the Scheme. ES Chapter 17: Socio -Economics, Tourism and Recreation [APP-054] specifically assessed the potential impacts of the Scheme, including HGV access points, on the recreational use of highway and public rights of way for pedestrians, cyclists, and equestrian users. A full assessment of the economic impact of the scheme is presented, with quantitative results for numbers of employment opportunities anticipated vs. agricultural sector jobs lost. ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed potential impacts as a result of the scheme to heritage assets within Mears Ashby. It assessed that a_Moderate adverse effect would occur to Mears Ashby Conservation Area as a result of the Scheme (see ES Appendix 12.9



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			appropriate measures to protect locally designated sites and priority habitats for protected species. To maximise the health and wellbeing benefits of nature and accessibility to it. Provision of a spatial strategy and place making approach influenced by the importance of the natural and historic environment and the role they play in creating local distinctiveness The Solar Farm will have a massive negative impact on the local Mears Ashby Conservation Area. – 90% of the village is within this area and has 28 listed buildings. The scale and location of the proposal will effectively industrialise the area. Changing it irrevocably from open countryside and prime agricultural land. Mears Ashby is a place of special character and historic interest in a unique setting within rural Northamptonshire, in extensive tracts of unspoilt open land contained within the central valley of the conservation area and its surrounds of rural farmland. This cultural heritage will be lost. The council is concerned that no archaeological surveys have been mentioned. The 'Northamptonshire Historic Gateway' shows 140 results for Mears Ashby and its surrounds. This comprises, Archaeology, Historic buildings and Historic landscapes, which date back to Roman times. The most significant finds are within	Cultural Heritage Impact Assessment Tables [APP-149]). Mitigation in the form of removal of solar panels from Fields DF4, EF9, EF16, EF34 Offsets (Fields DF1 to DF3, EF4 EF5, EF10-EF15, EF17) and enhanced screening of existing hedgerows and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area, have been designed to ensure the setting of the village is not compromised. ES Chapter 12 Cultural Heritage [APP-049], supported by appendices [APP-121 to APP-146 and APP-149] has assessed the potential impact of the scheme on identified archaeological assets. Where required appropriate mitigation is proposed. See Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] for embedded mitigation and Section 12.9 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146], and secured by Requirement 12 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] sets out how impacts on ecology and biodiversity will be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Area D being the largest area of proposed solar panels. The Landscape Character: Influenced by a combination of human and physical influences, which makes the area distinctive and needs to be conserved. To recognise the importance of views and vistas. The Landscape Character Assessment 2008 for the county is still relevant today. Visual impacts, concern the degree proposed development will become an adverse feature in particular views and the impacts that this has on people experiencing views. The Historic Environment: Being one of Northamptonshire's most valued assets. Responding appropriately to the historic environment being a key principle of good place making. These heritage assets include any site, place, area of landscaping identified as significantly meriting consideration in planning decisions. Below Ground Archaeology. These assets are an irreplaceable resource that need to be conserved so that they can be enjoyed for their contribution to the life of existing and future generations. I refer you to appendix A of this document being extracted from the Corporate Plan and further explaining these concerns.	avoided, mitigated and compensated. The reversion of the land within the Scheme to permanent grassland will confer significant biodiversity net gain, as evidenced in ES Appendix 9.13 BNG Assessment Revision A [EX1/GH6.3.9.13_A] . Security fencing will be permeable to mammals such as foxes and badgers, and wide buffer zones will permit continued movement of wildlife through the landscape. New habitat creation will benefit a wide range of wildlife, and bespoke enhancement measures, such as installation of bat and bird boxes, will also further enhance the Sites for these species.
MAPC-008	General Matters	Response to statutory consultation	2. The scheme design has not considered any alternative locations. Area C surrounds Wood Lodge Farm. Area D will completely ruin the longest and most widely used footpath in Mears Ashby and stifle an	The Applicant has followed a step-by-step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			important wildlife corridor. Area E contains a huge amount of important archaeological remains in the fields to the East of Mears Ashby (closest to the village). These fields should be left undisturbed and outside the scheme boundary. 3. Access points are located on 'non-HGV' roads. At points where disruption for local and through traffic will be considerable. A number of these access roads, in part, have no proper footpaths or cycleways thereby placing pedestrians, cyclists, and those with mobility issues at increased risk of accident or injury. The parish council is particularly concerned for the safety of the children and their parents at the village school. Mears Ashby has 'No HGV' routes through the village or close to the village. The village is already a 'rat run' for commuters and has congestion daily at and near to the school at drop off and pick up times. HGV delivery drivers will be likely to drive through the village; with the knowledge they cannot be forced to turn back. Local equestrian businesses regularly exercise horses through throughout the area and the village. Wilby Road has bad bends and reduced widths with soft verges, not suitable for large and increased traffic.	landscape and environmental designations in confirming site suitability and consideration of alternative sites. Details of the process are set out in ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] of the Environmental Statement. ES Chapter 5: Alternatives and Design Evolution [APP-042] of the Environmental Statement, the Applicant provided further details on the alternatives that were considered and the design evolution process for the Scheme. Solar panels and associated development have been removed from the fields within Green Hill C adjacent to Wood Lodge Farm as set out in Tables 5.8 and 5.9. The Applicant notes this comment around HGV access and has presented relevant assessment and mitigation in ES Chapter 13 Transport and Access [APP-050] of the Environmental Statement. The OCTMP Revision A [EX1/GH7.9_A] considers road users' safety and how to reduce traffic impacts from the Scheme. The Applicant notes the local highway network that makes up the construction vehicle routes to the Site will be managed in accordance with the detailed Construction Traffic Management Plan to ensure appropriate use by the vehicle numbers forecast over



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				a temporary period. The detailed CTMP will be approved by the relevant planning authority in consultation with the relevant highway authority, and is secured by Requirement 15 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] .
MAPC-009	Socio-Economics, Tourism and Recreation	Response to statutory consultation	3. Local businesses will be severely disrupted. By deliveries and construction traffic close to the access points and all local traffic will be severely affected. Again, increasing risk of accident or injury to both pedestrians and other road users. Construction is proposed to be on-going for two years. Excavators, cranes, lorries, earth moving machinery will cause continuous noise, vibration, dust and mud on roads which will adversely affect local businesses, particularly equestrian, residents, visitors and travellers. Local businesses will suffer as visitors to the area will be turned away by traffic problems, road closures, noise and delays. Access to Sywell Airport, Beckworth Emporium, local garden centres, The Griffin Head and Sywell Country Park will be adversely affected.	Impacts on driver delay, access by road, and risk to driver and non-vehicular user safety are assessed in ES Chapter 13: Transport and Access [APP-050]. The assessment therein finds no significant effects to any assessed metric. This is subject to the mitigation measures set out in the OCTMP Revision A [EX1/GH7.9_A], which include controls on HGV movements, noise, dust, and mud, which is secured by Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Applicant has assessed tourism and recreation receptors most likely to be impacted by the Scheme in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. This includes local businesses and facilities reliant on visitors where it is anticipated that the Scheme may directly impact upon their ability to operate. Of those highlighted, Sywell Aerodrome and Aviation Museum, Beckworth Emporium, and Sywell Country Park are specifically



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				considered, with no significant adverse effects anticipated. Industry impacts to accommodation and food business, cultural facilities, and sports and recreation business more generally have been considered in the likely effect on visitor spending. During construction, this is assessed as being up to 29 FTE jobs, equivalent to a loss of up to £1.66 million in visitor spending per annum in the Study Area. This is equivalent to 0.16% of the tourism economy in the assessed area, and is therefore not anticipated to be significant. Other individual businesses have not been assessed.
MAPC-010	General Matters	Response to statutory consultation	4. There has been no consideration to local flooding in Wellingborough Road. Mitigations have been documented as 'raising the height of the panels' which the council does not accept as being in anyway sufficient in addressing this concern. 6. The location of the 400kv substation close to Wood Lodge Farm is unacceptable. An alternative location, closer to the fields at the back of Park Farm must be considered. BESS-Electromagnetic Fields & Fire risks are well documented. Liable to catch fire requiring colossal amounts of water to extinguish Please see Appendix B (1). Consequential contaminated run-off to local water courses. Such a development being 1500 acres of industrial scale solar	The proposed location of the 400 kV substation in Site C has two options which are set out in ES Figures Illustrative Layout Green Hill C Options A and B [EX1/GH6.4.4.1_A and APP-197]. Either proposal show the substation would be to the south of the Sywell Solar Farm. There has never been a proposal where a substation has been any closer to Wood Lodge Farm than this position. Either option A or B has been considered by all environmental topics as part of the ES and found to be acceptable. The option for a substation in this location was established in the EIA Scoping Report [APP-066] in July 2024 and presented for Section 47 and Section 48



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			installations with a BESS & 400 kV substation is inappropriate on fields adjacent to Mears Ashby and its heritage assets. The parish council has given consideration and taken advice on the Preliminary Environmental Report in support of your application for the Development Consent Order and has concerns with the following sections: 2. Agricultural Land Classification A review of the ALC maps produced by DEFRA for the East Midland region indicates the bulk of the development is on land considered very good (class 2) and good (class 3) agricultural land and substantially exceeds your estimate of 66%. 3. Lifetime of the development You advise that the lifetime of the development will be 60 years. This equates to in excess of three generations, affecting local children and grandchildren. The council is therefore most concerned to ensure that the right decision is made on this development proposal. 4. UK Legislation – Planning Issues The parish council is aware that there is a significant consensus in planning policies that proposed development should be directed towards poorer quality land. The parish council is most concerned that in your	Statutory Consultation [APP-029] in October-December 2024. The Applicant is unable to ascertain if the comment of 'fields at the back of Park Farm' Industrial Estate pertain to land within the Order Limits or not. Land at the north end of Green Hill E was discounted from use for a 400 kV substation between Scoping and Statutory Consultation due to constraints on access and proximity to dwellings on Highfield Road. If further information can be provided, the Applicant can provide a more detailed response. The OBSSMP Revision A [EX1/GH7.7_A] documents how fire, explosion, and pollution risks will be prevented or fully mitigated. Please also refer to the reference MAPC-004, above, in respect of BESS safety. National Policy Statement EN-3, paragraph 2.10.65, confirms that applicants may seek consent without a time period, or for differing time periods of operation. The proposed maximum 60-year operational period is not uncommon, several solar DCO projects propose the same timescales including consented DCOs: Mallard Pass Solar Project, Cottam Solar Project; West



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			documents produced no alternatives have been considered.	Burton Solar Project; Gate Burton Energy Park and Tillbridge Solar Project. The Applicant's site selection process, including a search for suitable brownfield land, has been undertaken and presented as part of ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] of the Environmental Statement. Please also refer to the Applicant's response in 'NE-012'.
MAPC-011	Agriculture and Soils General Matters	Response to statutory consultation (food production)	5. Food Production within the proposed development. The bulk of the fields for the proposed development site are arable and grow wheat and barley cereals.	The 1200ha land for the proposed Sites represents only 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK, and therefore it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. UK Food Security Report 2024 indicates that the 6.0 million hectares of the croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MAPC-012	Agriculture and Soils Energy Need and Policy General Matters	Response to statutory consultation (food production)	6. UK Food Security. A review of the UK food security index states the UK produces most of the cereals, meat, dairy, and eggs that it consumes. Cereals production is susceptible to yearly change in weather. Due to wet weather 2024 harvest for wheat is forecast to reduce. The medium- and long-term expectation is that demand and production of arable crops will increase due to population growth. The parish council is concerned that whilst the UK is currently considered self-sufficient in cereal production, increase in demand over the next 60 years, being the advised lifetime of the proposed solar farm development, is likely to substantially reduce the UK ability to meet the required production levels. It is therefore the opinion of the parish council that it is necessary to maintain our agricultural land resources in order not to reduce the production of cereal crops for future generations.	The 1200ha land for the proposed Sites only represents 0.01% of 16.8 million hectares of the utilised agricultural area (UAA) and 0.027% of 4.4 million hectares arable land in the UK. UK Food Security Report 2024 indicates that as of July 2024, around 250,000 hectares of land have been entered into Sustainable Farming Incentive options that temporarily restrict food from being produced on that land. For context, this is the equivalent of around 3% of England's UAA (9 million hectares). Therefore, the 1200ha land for the proposed Scheme is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. In addition, the conversion of arable land to grassland would be a long-term fallow and will remove disturbance on the soils and will result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				national food security. The rent that will be paid to the landowners will provide them with a secure income over the operational life of the Scheme which will be consistent and resilient compared to the yields from crops which can be adversely affected by adverse weather conditions. This is recognised in paragraph 2.10.11 of National Policy Statement EN-3, which states that “solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land”. The Statement of Need [APP-556] also describes Government’s view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”. Please also see the response to ‘SGHS-004’ below.
MAPC-013	General Matters	Response to statutory consultation	7. Duty of Care. Green Hill Solar Farm and their investors, the land owners associated with the proposals, the Secretary of State and his advisers employed in the planning system, NNC Unitary Council, This Parish Council, and all local residents, all have a duty of care to future generations including	Please refer to the response to comment ‘MAPC-006’ and ‘HoPC-003’ above. National Policy Statement EN-1 confirms that renewable energy generation projects such as the Scheme are Critical National Priority infrastructure and that the Secretary of State, when considering



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			their children, grandchildren and great grandchildren to ensure development proposals are in their best interests. 8. Alternative Sites The parish council, whilst recognising the current farm proposals has a reasonably good connectivity to the Grendon substation, being located 14km south of the proposed site, near the village of Old, the parish council argues that this proposed site is not conveniently located, and an alternative must be considered. The parish council has been made aware of other numerous points of connection. Northamptonshire and some of the surrounding counties were subject to large opencast extractions. Many remain undeveloped and cannot be classified as prime agricultural land. For example, the London Road Solar Farm, near Irchester has been built over a restored opencast ironstone quarry.	an application for development, "should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals" (paragraph 4.3.24).
MAPC-014	General Matters Transport and Access	Response to statutory consultation	9. Transport and access. Chapter 13 Environmental Impact Assessment Scoping Report. The council has concerns regarding the identification of "local routes" to reach Green Hill sites C, D and E from identified SRN and MRN routes. (Paragraph 13.3). Page 222. At paragraph 13.3.8 Highfield Road is identified as a suitable local route to access Green Hill site D notwithstanding that this	An assessment of construction traffic is provided in ES Chapter 13 Transport and Access [APP-050]. Please refer to response to MAPC-005 on transport access for C,D and E.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			route is described in the report as, "a single lane rural road with limited passing places". Highfield Road is unsuitable for HGV's and large vehicles with no room to manoeuvre and no passing or turning places. The road has crumbling soft verge and road surface. It is not designed to carry anything other than local traffic. At paragraph 13.3.9 Wilby Road is identified as bisecting Green Hill site E, "and can be used to access Green Hill site E and the A509". Our comments with regards to the suitability of Highfield Road apply equally to Wilby Road. Additionally, Wilby Road has an acute left right bend in a dip which limits visibility and makes it unsuitable for use by HGV's. Such usage would pose a significant risk to other road users. At paragraph 13.3.9 Mears Ashby Road is identified as providing access to Green Hill site E. This road is a major commuter route between the A45 and A43 and has two blind bends at the summit of high ground limiting visibility for road users. The road also has significant agricultural, cycling and pedestrian traffic. The identified "local routes" would not allow large vehicles to turn to leave by the same route potentially forcing traffic into the village of Mears Ashby and Sywell.	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			At paragraph 13.1(page 222) Fig 1 identifies the local road network lined in black. This includes Highfield Road, Wilby Road and Mears Ashby/Earls Barton Road entering the village of Mears Ashby and being linked by Wilby Road on the Southern boundary of the village and Wellingborough Road on the eastern boundary of the village. Wilby Road and Wellingborough Road are within the curtilage of the village and are subject to weight restrictions. Access is limited due to road width, on street parking and tight bends. They are unsuitable for use by HGV's. The village should not be used as a "rat run" for construction traffic as this would pose a significant danger to residents and their property. SUMMARY The parish council would be unable to support this proposed scheme in its current form, for the many reasons and concerns expressed herein. Concerns that are equally shared with our residents and business operators, along with those equal concerns from other parish councils and their residents and business operators alike. The parish council therefore seeks that these concerns are fully considered and addressed.	
MAPC-015	General Matters	Response to statutory consultation	Whilst it is likely that the majority of UK residents favour renewable sources of energy including solar farms, it is also likely that the majority will consider energy security of prime	Please refer to the responses to comments 'MAPC-006' to MAPC-013' above.



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			importance. It is, however, equally important and most likely, that UK residents will equally share the concerns of our local residents in seeking to maintain and preserve our agricultural lands. Lands which produce cereals, to ensure that the UK is able to meet the increased needs and demands resulting from climate change, increases in population, GDP growth with demand in animal feeds. Increased demands which apply throughout and beyond the sixty-year lifespan of this project. The parish council is of the opinion that there are better alternative sites to the current proposals in the eastern UK which can accommodate solar farms on land which is not good agricultural land for food production. This being a priority requirement of the UK planning policies.	The Statement of Need [APP-556] also describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".
MAPC-016	General Matters	Response to targeted consultation	https://www.mearsashby-pc.gov.uk/wp-content/uploads/2025/07/Final-Response-to-Green-Hill-Solar-Farm-Targeted-Consultation.doc The council understands that this 'Targeted Consultation' consists of 24 'order limit extensions', all relating to boundary changes which are transport related to facilitate vehicular access to the sites and the cable corridor. The Parish Council objects strongly on the presentation of these proposals, the vagueness of the drawings (10. – 21), the lack of dimensions and reference points	The Applicant has responded to Mears Ashby Parish Council's representation to the targeted consultation in Consultation Report Appendix Targeted Consultation Section 42 and Section 44 Applicant Responses [APP-035] at pages 22-29.



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			(pages 9-14). The council would therefore seek further detailed consultation in order that they can give full and proper consideration to these further proposals. The council is most concerned to ascertain just how the public Highway can be included within a site boundary and would seek where the responsibility for the highway within the site boundary lies, including damage to the highway surface, verges, hedgerows, trees and drainage ditches. The Council is mindful that there will be a significant number of HGV's delivering huge quantities of construction materials to site, plus huge battery storage containers, steelwork and large quantities of concrete for the substations. Then there is the projected '650 + subcontractors and workers (7.30am - 5.30pm), and all their vehicles. The Council is most concerned that temporary traffic lights are the only way this amount of traffic can be controlled and significant delays for villagers and commuters using the village as a 'cut-through' will be inevitable. Every road in and out of the village, except Sywell road will be affected. It is possible that all 6 access points around the village will be operational at the same time, thereby frequently making the village gridlocked. This is a rolling programme of construction work across many sites, with many workers, and vehicles and lorries that will be crossing between the sites for the 2 years of the construction period. The council	



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			is greatly concerned with the adverse impact that such traffic congestion will likewise have on those needing to attend and have daily timely access to and from the school. The increased safety and wellbeing risks to the young children attending the school, as well as residents, caused by heavy vehicles, congestion created air pollution, noise and vibration. None of the roads out of the village, which are regularly walked by villagers, have pavements placing pedestrians at greater risk. There is a popular public footpath linking the village to Sywell Reservoir that crosses the Earls Barton Road at the very site access point proposed. Again, no details are provided in these consultation documents as to how this matter will be safely addressed. The Council is equally mindful that roads around and throughout the village are simply not suitable for Heavy Goods Vehicles. Some already are HGV restricted (other than access) however, complete lack of enforcement results in numerous incidents of lorries failing to observe these restrictions. The council would therefore be most concerned to know how, and by what authority any measures, which may be proposed, to control deliveries to certain times and restricted areas, will be enforced. The Council and residents experience has been that Lorry drivers/hauliers are notoriously independent and 'a law unto themselves'. Delivery vehicles are bound to	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			arrive early and park on the road waiting for the sites to open, further adding to congestion and delays for other road users. The Parish Council has already expressed in response to statutory consultation, its grave concerns relating to this project and in particular the following transport/traffic related issues: Access points are located on 'non-HGV' roads with 7.5 tons, with old narrow bridges over watercourses, and at points where disruption for local and through traffic will be considerable. A number of these access roads, in part, have no proper footpaths or cycleways thereby placing pedestrians, cyclists, and those with mobility issues at increased risk of accident or injury. The parish council is particularly concerned for the safety of the children and their parents at the village school. Mears Ashby has 'No HGV' routes through the village or close to the village. The village is already a 'rat run' for commuters and has congestion daily at and near to the school at drop off and pick up times. HGV delivery drivers will be likely to drive through the village; with the knowledge they cannot be forced to turn back. Local equestrian businesses regularly exercise horses through throughout the area and the village. Wilby Road has bad bends and reduced widths with soft verges, not suitable for large and increased traffic. Local businesses will be severely disrupted. By deliveries and construction traffic close to the	



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			access points and all local traffic will be severely affected. Again, increasing risk of accident or injury to both pedestrians and other road users. Construction is proposed to be on-going for two years. Excavators, cranes, lorries, earth moving machinery will cause continuous noise, vibration, dust and mud on roads which will adversely affect local businesses, particularly equestrian, residents, visitors and travellers. Local businesses will suffer as visitors to the area will be turned away by traffic problems, road closures, noise and delays. Access to Sywell Airport, Beckworth Emporium, local garden centres, The Griffin Head and Sywell Country Park will be adversely affected.	
MAPC-017	Alternatives and Design Evolution Cultural Heritage	Mears Ashby Hall impacts	https://www.mearsashby-pc.gov.uk/wp-content/uploads/2025/06/Mears-Ashby-Hall-Impact-Assesment.pdf The focus of this report is on the potential impacts of the solar farm on the heritage significance (including setting) of Mears Ashby Hall and the conservation area. There may be impacts on the significance of other heritage assets elsewhere. Further detailed analysis will be necessary to assess the full impact of the proposals on the broader setting. The proposals for a solar farm to provide green renewable energy are an important addition to the British power network. The following assessment is intended to analyse the impact the	Please refer to the response to comment 'MAPC-005' above. ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] , has assessed potential impacts as a result of the scheme to heritage assets within Mears Ashby. It assessed that a Moderate adverse effect would occur to Mears Ashby Conservation Area as a result of the Scheme (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). While the Scheme has the potential to undermine the general rural character of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			development would have on the heritage significance, if there is the potential for harm, to explore how any mitigation measures proposed might eliminate or minimise that harm. While the proposed extent of the solar farm does not abut the grounds of Mears Ashby Hall the impact on the setting of the hall requires thorough assessment. The information supporting the proposals for the solar farm acknowledges that there may be an impact on the setting of both the Hall and that of the village resulting from the installation of its solar panels. The proposals make provision for what appears to be a landscape buffer around the perimeter of the solar panels. To the west of the Hall and south of the village a field, through which runs a public right of way, is shown to be kept free of panels. There are a further two areas to the south and east of the hall that are shown to be undeveloped, possibly because of limitations imposed by topography or other physical features. The absence of panels does not necessarily equate to the absence of development or use in association with the solar farm. The council is most concerned with the questions that arise from this approach: What will the 'empty' spaces be used for. Will this give rise to any adverse impacts?	Mears Ashby Hall (NHLE 1040699) in the broadest sense, the design of the Scheme, where panels are not proposed in fields nearest to the asset, reduce this impact to a large degree. As such, the Scheme will result in no harm to the Mears Ashby Hall (NHLE 1040699). Embedded mitigation in the form of removal of solar panels from Fields DF4, EF9, EF16, EF34 Offsets (Fields DF1 to DF3, EF4 EF5, EF10-EF15, EF17) and enhanced screening of existing hedgerows and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area has been proposed. The Applicant agrees that mitigation in the form of removal of solar panels from Fields DF4, EF9, EF16, EF34 and offsets in Fields DF1 to DF3, EF4 EF5, EF10-EF15, EF17, EF22 and EF33 will lower the impact of the Scheme on the settings of the assets. Enhanced screening of existing hedgerows roads into the Conservation Area and fields in the wider landscape that front the Conservation Area, have been designed to ensure the setting of the village and assets is not compromised. The fields stated above where solar panels have been removed will be left as



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			Are the proposed buffers adequate to mitigate any harm (the supporting information suggests that there would be some harm). Is there a lost opportunity to put the vacant fields to a use that would help mitigate any harm?	such and no development that could result in adverse setting impacts will take place. Where possible ecological mitigation has been proposed in areas that have not been proposed solar infrastructure, and landscape features will be enhanced that have a positive contribution to the historic landscape character. The proposed buffers were discussed with Historic England and North Northamptonshire Council and their feedback was used to inform assessment, design and mitigation proposals (see ES Appendix 12.8 Consultation Tables [APP-148]).
MAPC-018	Cultural Heritage	Mears Ashby heritage impacts	The level of detail of the supporting information allows only a preliminary assessment of the potential impacts on the significance of the development Area. That the supporting information provides no evidence of the analysis of the significance of these designated heritage assets suggests that any subsequent assessment of impact would be extremely limited. This heritage report has carried out a more detailed analysis that allows for a more reliable and accurate assessment of impact. While it is acknowledged that landscape buffers appear to be proposed and that in certain areas panels are not proposed it is considered that these measures are inadequate to mitigate the harmful impact the solar panels and the associated activities would have on the	The Applicant understands that the comment quotes the conclusions from a Heritage Report drafted in June 2025 on Mears Ashby Hall (NHLE 1040699) (Worlledge Associates 2025). The Applicant respectfully disagrees with conclusions of the report and highlights that the description of the Scheme presented in the report is incorrect: <i>"It is proposed to construct a series of three solar farms throughout Northamptonshire. The Farm named 'Farm C' is to be located to the south of Mears Ashby Village."</i> ES Chapter 4: Scheme Description [APP-041] provides the correct description of the Scheme.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			significance of the area. There will be an erosion, and perhaps total loss of connection. This loss represents harm to the heritage significance of Mears Ashby which at its lowest level and assuming that the proposed mitigation is successfully managed. No justification is provided for harm and so the proposals should not be supported at this stage. The consultation proposals show that there will be a level of harm that is not justified. This harm derives from development within the setting of designated heritage assets and from development that would affect the character and appearance of the conservation area. As Historic England advises in its published advice 'The Setting of Heritage Assets'. (GPA3) Early assessment of setting and impacts provide a basis for agreeing the scope and form of development and for reducing the risk for disagreement and challenge later. It goes on to explain in paragraph 39 - 40 39. Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements. For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by	ES Chapter 12: Cultural Heritage [APP-049], is supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], which provides a detailed assessment of the significance of the relevant designated heritage assets and their settings and the potential impacts as a result of the Scheme in line with appropriate policy, standards and guidance (i.e. NPS EN-1 and EN3, North Northamptonshire Joint Core Strategy 2011-2031 Policy 2, as well as Historic England Guidance GP2 and GPA3 and ClfA standards and Guidance for Historic Environment Desk-based Assessment (2020)). All assessment work has been undertaken in consultation with Historic England and the Conservation Officers representing the relevant local authorities. ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], assessed that a Moderate adverse effect would occur to Mears Ashby Conservation Area as a result of the Scheme (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). While the Scheme has the potential to undermine the general rural character of Mears Ashby Hall (NHLE 1040699) in



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			fundamental issues such as the proximity, location, scale, prominence or noisiness of a development.... 40. Where attributes of a development affecting setting may cause some harm to significance and cannot be adjusted, screening may have a part to play in reducing harm. As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting.	the broadest sense, the design of the Scheme, where panels are not proposed in fields nearest to the asset, reduce this impact to a large degree. As such, the Scheme will result in no harm to the Mears Ashby Hall (NHLE 1040699). Embedded mitigation in the form of removal of solar panels from Fields DF4, EF9, EF16, EF34 Offsets (Fields DF1 to DF3, EF4 EF5, EF10-EF15, EF17) and enhanced screening of existing hedgerows and tree belts along approach roads into the Conservation Area and fields in the wider landscape that front the Conservation Area has been proposed. It is acknowledged that screening must be carefully integrated with the surrounding landscape to be effective. The proposed mitigation has therefore been developed in conjunction with other assessments, including ES Figure 4.14: Landscape and Ecology Mitigation Plan E [APP-212–213].
MAPC-019	Community Benefits	CBF benefactors	Community Benefits. The parish council is mindful of community benefits referred to in the consultation document. We believe the communities closest to the proposed development should benefit and are best placed to recommend what they believe a 'community benefit' should be.	The Applicant is committed to ensuring that community's benefit from the Scheme, including by receiving direct funding to important causes in the local area. During the development of the proposals for the Scheme, the Applicant consulted on community benefits and, based on feedback, will determine how



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				best to distribute funding. The Applicant anticipates that government-supported best practice guidance on community benefits will be issued later this year and will incorporate this guidance in its approach. The Scheme will also generate business rates that are paid to the local authority and support local services.
MAPC-020	Community Benefits	CBF guarantees	Should this development be granted consent: The parish council would be most concerned to ensure that the planning inspectorate, if granting approval of the proposed scheme, it would be strictly on the basis that finances and resources are a compulsory requirement to mitigate the loss of the countryside and to protect residents and road users from the adverse traffic impacts. The parish council would seek that connected, proper pavements, footpaths, and cycleways along the sites access roads, are installed and maintained with developed connections from the village of Mears Ashby to the North Northamptonshire Greenway, being a strategic rural network of safer, largely traffic-free routes suitable for walkers, wheelers, cyclists and equestrian users where appropriate, connecting settlements, employment, leisure and tourism destinations across North Northamptonshire and beyond.	Please refer to reference MAPC-018, above. ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] of the Environmental Statement assesses impacts on the accessibility, desirability and use of public rights of way (PROWs), open spaces, formal and informal recreation facilities in the countryside. The Applicant has explored opportunities to improve connectivity within the area and enhance the visual amenity of the scheme through landscape mitigation. This has included the provision of permissive paths in Green Hill D and E to benefit residents of Mears Ashby, and enhancement to PROW and permissive path user experience through the planting of wide planting buffers and ecological areas, separating users from onsite infrastructure (see the Landscape and Ecological Mitigation Plans [APP-207 to APP-219]). The Scheme is not



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The parish council would seek that a piece of land from the development be set-aside as a Suitable Alternative Natural Green Space (SANG), close to the village with safe and easy walking distance for residents, that could be developed as an eco-friendly pocket park/play area. The parish council would further seek that measures to mitigate should include Noise Barriers and other forms of landscaping including bunding and planting of natural hedgerows and trees to negate the development impact on the views and vistas from both within the village and from surrounding roads.	able to commit to permanent recreational area (such as a SANG or pocket park) as the Scheme is temporary in nature.



5.11 Moulton Parish Council

Table 5.15: [RR-1234](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MoPC-001	General Matters	Location of solar	Moulton Parish Council has no material objections to the proposal but would prefer to see solar panels installed on existing and new buildings rather than open green space.	The Applicant notes this comment. In Chapter 5: Alternatives and Design Evolution [APP-042] of the Environmental Statement, the Applicant provided further details on the alternatives that were considered and the design evolution process for the Scheme.



5.12 Northamptonshire Badger Group

Table 5.16: [RR-1244](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NBG-001	Ecology and Biodiversity	Badger survey assessment findings	Northamptonshire Badger Group has been the recognised county species recorder for badgers for over 40 years, holding the most comprehensive and up-to-date dataset on badger setts, foraging areas, and habitat across Northamptonshire. We work closely with statutory bodies, local authorities, and ecological consultants to ensure that developments comply with the Protection of Badgers Act 1992 and relevant planning and biodiversity legislation. Initial review of the proposed solar farm site indicates that multiple active badger setts, key foraging routes, and core habitat areas will be directly and indirectly affected by the development. Such impacts require careful assessment, robust avoidance and mitigation measures, and, where possible, genuine ecological enhancement to maintain the local badger population's viability.	Badger surveys were completed across the Scheme, with any subsequent evidence of badgers, recorded during additional ecological surveys, added to the overall dataset. All badger data contributing to the ecological baseline is set out in ES Appendix 9.5 Badger Surveys [APP-088]. The full assessment of potential impacts on badgers during the construction and operational phases, including any additional mitigation measures required to address any significant effects identified, are provided in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. The OEPMS Revision A [EX1/GH7.5_A] includes specific mitigation measures relating to badgers, and is secured by Requirement 8 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
NBG-002	Ecology and Biodiversity	Quality of assessment	Our planning sub-committee has extensive expertise in assessing ecological appraisals and identifying omissions or weaknesses in badger-related survey work. We wish to register as an interested party to provide informed, evidence-based input and to assist in ensuring this project meets both	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			legal requirements and best-practice ecological standards.	



5.13 Olney Town Council

Table 5.17: [RR-1246](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
OITC-001	Transport and Access	Construction traffic routing	Olney Town Council's Development Committee expresses its concerns regarding the proposed route of construction transport using High Street, Olney (A509). The council's Town Clerk was reassured that this would not be the case, at a consultation event held on Thursday 30th May 2024, in Turvey Village Hall, Bedfordshire, so it has been very disappointing to receive notification that the proposals go directly against something that was already stated over a concern raised almost 18 months prior. Using High Street, Olney, in this way, is not deemed appropriate by the committee, with the amount of construction traffic likely to cause delays and potentially damage, on an already busy trunk road. If this has been selected as a route to the Lavendon site from junction 14 of the M1 motorway, it would be deemed far more appropriate to use the A45 and A428 from junction 15 of the M1 motorway.	The route through Olney is identified as a route that might be used by construction workers. It is not an HGV route as set out in the OCTMP Revision A [EX1/GH7.9_A]. The route has been identified as a potential route for abnormal loads ES Appendix 13.2 Transport Assessment Part 3 of 3 [APP-153]. The route through Olney may be used to transport the transformers associated with Green Hill F and Green Hill G totalling 4 in number as confirmed through Table 7.1 of ES Appendix 13.2 Transport Assessment Part 1 of 3 [APP-151]. All movements will be subject to specific approval, notices and conditions agreed with the highways authorities and police to ensure safe their safe movement.



5.14 Scaldwell Parish Council

Table 5.18: [RR-1247](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
ScPC-001	General Matters	Statement of objection	Objection to Green Hill Solar Farm DCO Application (EN010170) Submitted by: Scaldwell Parish Council Scaldwell Parish Council objects to the proposed Green Hill Solar Farm on the grounds that it fails to comply with key national planning policy tests, presents unresolved environmental, safety, and transport risks, and lacks adequate legal safeguards for restoration, thereby rendering it unacceptable in its current form.	The Applicant notes this comment and has responded to the parish council's objections on a topic-by-topic basis below. The Applicant has set out policy compliance in the Policy Compliance Document [APP-567].
ScPC-002	Agriculture and Soils Alternatives and Design Evolution Energy Need and Policy Principle of Development	Use of BMV and location of solar	Loss of Best and Most Versatile (BMV) Agricultural Land The Applicant admits that approximately 65% of the site comprises Grade 1, 2, and 3a land—classified as Best and Most Versatile. NPS EN-1 (2023) Paragraphs 5.11.12–14 require that development on BMV land should be avoided unless there is a clear and compelling justification, supported by evidence that no suitable alternative sites exist. The site selection process, as presented in the Environmental Statement, fails to robustly demonstrate that less valuable land, brownfield sites,	The Applicant has undertaken a 5-Stage Site Selection Process, widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] in compliance with National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection on commercial feasibility and the efficiency of the transmission of electricity to the grid, to avoid the use of BMV land as much as possible. The search outcome indicates that the majority of the land within the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			or rooftop solar options were fully considered and discounted. This represents non-compliance with national policy. The National Planning Policy Framework also states that development should seek to avoid the loss of high-quality agricultural land where possible, giving preference to lower-grade and previously developed sites. The proposal is therefore contrary to both national policy documents.	20km search area has a high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results. The 1200ha land for the proposed Sites represents only 0.01% of 16.8 million hectares of the utilised agricultural area in the UK therefore it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. In Chapter 5: Alternatives and Design Evolution [APP-042] of the Environmental Statement, the Applicant provided further details on the alternatives that were considered and the design evolution process for the Scheme. The Applicant addresses brownfield and rooftop developments in Section 7.3 of the Statement of Need [APP-556], in particular the constraints and limitations of rooftop solar and the benefits of transmission connected solar. In summary, a very large number of commercial rooftops would be required to deliver a utility-scale solar farm. This would require multiple land ownerships, and the legal complexities involved in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				combining multiple sites of this nature would be prohibitive. The government recognises rooftop solar as being clearly desirable, both on residential and commercial premises. However, rooftop solar energy cannot be considered as a reasonable alternative to the Scheme because rooftop solar alone will not be able to meet the scale and pace required of new capacity growth to meet the UK's needs. Therefore utility-scale ground mounted solar schemes are also needed. Roof-mounted solar panels should still be deployed in addition to utility-scale solar farms but should not be deployed instead of them.
ScPC-003	Transport and Access	Construction traffic in Scaldwell	Highway Access and Traffic Safety Concerns in Scaldwell the Transport Assessment and associated ES chapters indicate that construction and maintenance traffic will access the site via a network of narrow, rural lanes with limited capacity, poor alignment, and restricted visibility in several locations. In Scaldwell, there has been a marked increase in Heavy Goods Vehicle (HGV) movements following the opening of a nearby depot associated with STABILISED PAVEMENTS LIMITED, based in Scaldwell. These HGV movements already place significant pressure on local roads.	Construction HGV routes for the Scheme avoid movements through Scaldwell. It is acknowledged that some construction worker traffic may use routes through Scaldwell. Movements will be managed and controlled through the detailed Construction Traffic Management Plan, which will be substantially in accordance with the OCTMP Revision A [EX1/GH7.9_A] . This includes a commitment to a Construction Worker Travel Plan. These plans are secured by Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The High Street is restricted to a single carriageway due to on-street parking along one side, creating pinch points and increasing collision risk when larger vehicles pass through. The addition of construction traffic, abnormal loads, and long-term maintenance vehicles generated by this scheme will compound existing safety issues and congestion, with insufficient enforceable mitigation in the Applicant's transport proposals. Scaldwell is a rural community with narrow, weight-restricted roads completely unsuitable for heavy goods vehicles. Additional construction and maintenance traffic from the scheme will worsen congestion, damage roads, and increase hazards.	An assessment of construction traffic impacts is provided in ES Chapter 13 Transport and Access [APP-050].
ScPC-004	Consent Order General Matters	Decommissioning guarantee	Inadequate Decommissioning and Restoration Guarantees The Draft DCO (Schedule 2) and Outline Decommissioning Statement (GH7.3) do not provide for a legally binding financial bond or enforceable mechanism to secure full site restoration at the end of the project's operational life (~60 years). Without such guarantees, the risk falls to the community and local authority that the site could be abandoned or	The impacts of decommissioning have been assessed throughout the Environmental Statement. Please refer to the ODS [EX1/GH7.3_A] which provides details and control measures of decommissioning activities. Requirement 21 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] requires the Scheme to be decommissioned in accordance with a decommissioning plan, based on the ODS [EX1/GH7.3_A], to be approved by



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			inadequately restored, contrary to principles of sustainable development and environmental stewardship.	the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. The Applicant notes that there is no policy requirement for a decommissioning fund to be imposed and paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments. The Applicant considers that Requirement 21 complies with paragraphs 2.10.146 to 2.10.148 of NPS EN-3. The Secretary of State has considered this point in previous decisions for solar projects under the Planning Act 2008 and determined that imposing a decommissioning fund requirement is not necessary.⁵ This is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only

⁵ For example, see paragraphs 4.44 and 4.45 of the Secretary of State's Decision Letter for the Oaklands Farm Solar Park



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				relevant requirements should be imposed.
ScPC-005	Major Accidents and Disasters	BESS fire impacts	Under-Assessed Major Accident and Disaster Risk from the Battery Energy Storage System (BESS) The Environmental Statement's Major Accidents and Disasters assessment acknowledges risks of fire, thermal runaway, and chemical pollution, but relies on generic mitigation measures without site-specific modelling of worst-case scenarios—particularly with respect to the site's hydrological connectivity to nearby protected habitats, including SPA and RAMSAR sites. This creates an unacceptable residual risk to both the environment and public safety.	The Applicant's OBSSMP Revision A [EX1/GH7.7_A] and ES Appendix 16.2 BESS Fire Emissions Modelling Report [APP-167] document how BESS failure events can be prevented or fully mitigated with no significant impacts on sensitive receptors within 1 km of the BESS areas. Section 6 of the OBSSMP documents pre-construction requirements that must be fulfilled by the Applicant at the detailed design stage (Safety standards, Testing requirements, Risk Assessments, Consequence modelling, etc). Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous site-specific consequence modelling to minimise the requirement for Northamptonshire Fire & Rescue Service (NFRS) intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or other infrastructure equipment. The final BSSMP is secured by Requirement 6 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A], which



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				also requires the relevant planning authority to consult with Northamptonshire Fire and Rescue Service and the Environment Agency before approving the final plan.
ScPC-006	Landscape and Visual Impact	Assessment of LVI	Significant Adverse Landscape and Visual Impacts The Landscape and Visual Impact Assessment identifies multiple receptors (including public rights of way, residential properties, and designated heritage settings) that will experience significant adverse visual effects persisting beyond Year 15, even after proposed mitigation. The Planning Statement asserts that these harms are outweighed by the scheme's benefits, but no robust balancing analysis is provided to justify this conclusion in policy terms.	ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] sets out Residual Effects within Section 8.12. The landscape assessment identifies Moderate Beneficial (Significant) Residual Effects to landscape fabric. The visual assessment identifies Moderate Adverse (Significant) effects to users of PRoW NN TU 3 within Site E (TP091) and PRoW NN TA 4#1 within Site F (TP181) with Major/ Moderate Adverse (Significant) effects identified to users of NN TD 2 within Site F (TP184). No other residual significant effects were identified within the LVIA. Please refer to ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] for details on Visual Assessment. NPS EN-1 confirms that there is a Critical National Priority (CNP) for renewable energy generation infrastructure, such as the Scheme. Paragraphs 3.2.6 to 3.2.8 of NPS EN-1 confirm that all such applications should be assessed on the basis that there is an urgent need for the type of infrastructure, and substantial weight should be given to this need.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Paragraph 3.3.63 further confirms that the urgent need for CNP Infrastructure “will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy”. Section 7 of the Planning Statement [APP-559] concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as confirmed in NPS EN-1 and further demonstrated in the Statement of Need, outweighs any potential significant adverse impacts which, as the Environmental Statement [APP-038 to APP-064] sets out, are limited, and will be considered by the Secretary of State in making a decision on the application.
ScPC-007	Consultation	Adequacy of consultation	Procedural Concerns in Consultation and Alternatives Assessment The Consultation Report reveals that many consultees—including statutory bodies—raised substantial concerns regarding BMV land loss, scheme scale, visual harm, traffic impacts, and BESS safety. There is limited evidence that these issues were substantively addressed or that the scheme was meaningfully amended in response, undermining the	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Chapter 10 of Consultation Report Revision A [EX1/GH5.1_A] describes



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			adequacy of the consultation process under the Planning Act 2008.	the significant volume of responses received from Section 42 consultation and Section 47 consultation, including the issues raised and how these were considered by the Applicant. The Applicant notes the Adequacy of Consultation Responses (AoC 001 – AoC- 015) where consultees provided their feedback on the adequacy of the consultation. ES Chapter 5: Alternatives and Design Evolution [APP-042] also provides detail for how the responses to consultation have been taken into consideration in the iterative design of the Scheme.
ScPC-008	General Matters	Concluding remarks	Conclusion Scaldwell Parish Council considers that these multiple and interlinked deficiencies—in policy compliance, environmental safeguarding, safety assurance, transport risk management, and procedural adequacy—mean that the application should be refused in its current form. Approval would set a damaging precedent for the unnecessary industrialisation of high-value agricultural land without adequate safeguards for restoration, public safety, highway safety, or landscape protection.	The Applicant notes this comment but does not agree with it for the reasons set out in responses ScPC-001 to ScPC-007.



5.15 Stop Green Hill Solar

Table 5.19: [RR-1248](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-001	General	Status and Introduction	1.Introduction 1.1. Stop Green Hill Solar' (SGHS) represents communities across Grendon, Easton Maudit, Bozeat, Mears Ashby, Earls Barton, Walgrave, Holcot, Old, Lavendon, and surrounding parishes. Concerned residents strongly object to the proposed Green Hill Solar project in its current scale and configuration and wish to be represented as an Interested Party in the forthcoming Examination into the proposed DCO. 1.2. This document sets out in the communities' own words and assessments their concerns, and how they perceive their own villages and surrounding countryside which are now threatened by this proposal. 1.3. SGHS are seeking to engage constructively with the Examining Authority (ExA) and to all par es, to ensure that the community concerns and objections are fully reflected in any subsequent decisions and recommendations made the ExA	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			during and following the examination. 1.4. Clearly, there is growing resistance to such commercial solar schemes, and increasingly these are being refused the local level for good reason. It is hoped that the Examination will conclude likewise and recommend that Consent is not granted. 1.5. SGHS concludes from its own assessments and having had the opportunity to examine the Application and Environmental Statement (ES), that the local communities are unable to support this proposal, and further evidence will be submitted when invited to do so under the Written Representation stage.	
SGHS-002	Energy Need and Policy	Summary and Overall position	2.Summary and Overall position 2.1. SGHS strongly objects to the proposal and contends that the application and other submitted evidence do not present a full picture of the environmental, social, and economic impacts. Furthermore, that crucial information to assess and determine those impacts, and the proposed mitigation, lacks the necessary detail and depth, and in some cases is entirely absent.	The Scheme is automatically deemed nationally significant due to its size (i.e. being a generating station with a capacity of > 50MW in accordance with Section 15 (2) of the Planning Act 2008. The Statement of Need [APP-556] describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			2.2. In SGHS opinion the proposal is not policy compliant with relevant international, national, and local policies relating to planning, renewable energy, and food security objectives. Furthermore, it fails to support the overarching UN and UK Sustainable Development Goals which underpin the UK planning system.¹ 2.3. Notwithstanding the inadequacies in the Dra DCO Application documents, including the Environmental Statement, SGHS members' local and detailed knowledge of the area is invaluable in assessing the impact of the proposal. Given the enormous scale and size of the proposal, SGHS do not consider that it can be made acceptable through the proposed mitigation measures, nor made palatable through minor community benefits. 2.4. There is an absence of any financial viability or business case. It is therefore not possible to determine if the mitigation and community benefits proposed are in anyway proportionate. Information on viability is essential to the assessing the project and SGHS	system in 2050 is likely to be composed predominantly of wind and solar". The Statement of Need [APP-556] provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050 The Applicant respectfully disagrees with this statement and invites the Interested Party to specify which policies it considers the application is not compliant with. The Funding Statement [APP-020] explains that through its parent company IGP, the Applicant can procure the financial resources necessary to fund the works to be authorised by the Order. Further information on the Applicant's corporate structure and how the DCO is proposed to be funded is in the Funding Statement [APP-020]. Please refer to the response to 'NNC-085' for details on the community benefit fund.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			would urge the ExA to request such information.	
SGHS-003	Energy Need and Policy	Food Security sustainability	3.Relevant Government and Local Statutory Policy National and Local Policy Framework 3.1. There is broad agreement on the planning policy framework, and SGHS wish to emphasise that food security policy should be considered, as well as wider UN SDG's, alongside other national policy where relevant. 3.2. Key relevant planning policy includes but is not limited to:- • National Policy Statements (NPS) for energy (NPS EN1), renewable energy infrastructure (NPS EN-3), and electrical networks infrastructure (NPS EN-5). • The National Planning Policy Framework (NPPF December 2024) • Local planning policies and statutory Development Plans. 3.3. A range of energy policy documents will be referred to including, but not limited to:- • The UK Solar Road Map (June 2025) • British Energy Security Strategy (April 2022)	Please refer to the response to ScPC-002' above. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will come back to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			3.4. UK food security policy overview is contained in, but not limited to, • Policy paper 'Government food strategy' Published 13 June 2022 3.5. SGHS will also refer to sustainable development and Life Cycle Analysis policy to be addressed in respect of the solar energy generating infrastructure, reliance on Chinese imports and human trafficked labour. The UK's policy on sustainable development is cross cutting but founded on the United Nations Sustainable Development Goals. This states, "The 2030 Agenda for Sustainable Development was adopted by 193 UN member states at the United Nations Sustainable Development Summit in 2015. It provides an ambitious, globally agreed, shared blueprint for the world we want to see by 2030 and is centred around the 17 Sustainable Development Goals (also known as the Global Goals or SDGs)."² The UN SDGs provide the framework for, and underpin policies on planning, climate change and food security. They are material considerations in the interpretation of relevant policy	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			as well as material considerations in determining the DCO application.	
SGHS-004	Energy Need and Policy	Energy Security and climate change	4.UK Energy Security, and Life Cycle Emissions 4.1. The UK energy strategy upon which the applicant relies to justify this proposal is built upon two foundations or pillars – these are:- i) ii) measures to reduce carbon emissions and thus combat climate change to meet Government commitments on Net Zero and local government Declarations. energy security and a reduction on foreign supplies of energy, given added impetus since the war on Ukraine affecting both supplies and energy prices. STG intends to explore these justifications as part of its WR, especially in view of the dependence on foreign ownership and control of such proposals, and the need to import all of the infrastructure to build them. Critical decisions will be taken outside the UK, often lacking openness and transparency. This is important for the UK's energy security. The absence of life cycle analysis (LCA) applied to the vast scale of the proposed energy generating infrastructure and the absence of assessment of scope 1, 2 and 3	The Statement of Need [APP-556] provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. The Statement of Need explains that the development of new low-carbon, UK-based electricity generation schemes supports decarbonisation by offering consumers electricity with no carbon emissions for their current demand and also for the future electrification of heating and transportation. This is needed to further displace imports of gas and oil, reducing overall reliance on imported energy in the British energy system and increasing protection for GB consumers from volatile international energy markets. The Statement of Need describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			emissions fall below best practise standards. The wider, off-site environmental impacts are relevant to weigh up the benefits and downsides of this proposal in relation to climate change and sustainability. Andy Anderson BA (Hons) DipTP MSc. MRTPI FRGS For and on behalf of Stop Green Hill Solar (SGHS). 5th August 2025	2050 is likely to be composed predominantly of wind and solar". The Study Area for ES Chapter 7 Climate Change [APP-044] is the global climate in accordance with the latest IEMA guidance. The chapter contains a lifecycle assessment covering construction (Section 7.10.1-7.10.22), operation (Section 7.10.23-7.10.42), and decommissioning (Section 7.10.43-7.10.45) phases. The assessment includes scope 3 emissions inclusive of transport emissions and embodied carbon calculations for key components like solar PV arrays, Battery Energy Storage System (BESS), transformers, inverters and cables, explicitly addressing the examiner's concern about off-site environmental impacts. The Requirements in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] will control the construction, commissioning, operation and decommissioning of the Scheme. The Requirements secure a range of detailed plans to manage and mitigate environmental effects, provide planting enhancements and biodiversity net gain. A breach of any requirement in the DCO would constitute a criminal offence. This demonstrates how community and environmental priorities will be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				fundamental to the Scheme throughout its lifetime.
SGHS-005	General	Community perspective	The following Appendices provide the ExA with community's own perspective after having examined the application and their understanding of the reality of the proposals and their local knowledge. Appendix 1 Community Statement Representing: Local residents in Lavendon, Bozeat, Grendon, Easton Maudit, Bozeat, Mears Ashby, Earls Barton, Walgrave, Holcot, and Old. Appendix 2 Focus on Agricultural Land. An Green Hill Solar: Objection Report – to the Proposed Green Hill Solar Farm Prepared by: Gary Ellio and Chris Bailey (local farming experience). Appendix 3 Objection to the Use of Best and Most Versa le Agricultural Land – Focus on Grendon and Easton Maudit. Appendix 4 BESS and Site F Transport Objections (Grendon/Easton Maudit) Inconsistent Route Commitment Appendix 5 Greenhill Solar – BESS Cumulative Impact Issues and Concerns	The Applicant notes this comment



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Appendix 6 LVIA Summary – Grendon and Easton Maudit	
SGHS-006	Cultural Heritage Landscape and Visual	Local Character and loss of identity Access to PRoW	Appendix A Relevant Representation 'Stop Green Hill Solar' (SGHS) Interested Party Name: Stop Green Hill Solar (SGHS) Representing: Local residents in Lavendon, Bozeat, Grendon, Easton Maudit, Bozeat, Mears Ashby, Earls Barton, Walgrave, Holcot, and Old. Proposed NSIP DCO: Green Hill Solar Farm - Planning Inspectorate Ref: EN010170 Submitted: 5th August 2025 Representation Summary: We represent communities across Grendon, Easton Maudit, Bozeat, Mears Ashby, Earls Barton, Walgrave, Holcot, Old, Lavendon, and surrounding parishes. Concerned residents strongly object to the proposed Green Hill Solar project in its current scale and configuration. Each of the villages and areas covered by the proposed plans has local character and identity: Lavendon is an historic rural village within the outlying area of Milton Keynes administration. It has Roman and Norman heritage sites and the	The assessment undertaken in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] assess the likely significant effects of the Scheme on the socio-economic environment, including employment, accommodation, and the impacts to the agriculture and tourism industries. Impacts on individual tourism and recreation receptors, such as PRoWs, recreational routes (such as the Waendel Walk), and key tourism destinations (such as and not limited to Sywell Aerodrome and Beckworth Emporium). The assessment identifies significant adverse effects to long-distance recreational routes (including the Waendel Walk) during construction due to their high sensitivity. The assessment undertaken in in ES Chapter 18: Human Health [APP-055] assesses the impact of the Scheme on physical and mental health and wellbeing within communities. In direct consideration of rurality and people's association with where they live is the assessment of '<i>community identity, culture, resilience and influence</i>', which considers how the Scheme impact on community wellbeing, sense of place, and the extent to which



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			fields and woodlands between the village and the A509 are used daily by dog walkers and others and includes highly productive farmland. In September 2024, the village centre was flooded and impassable. Local residents have voiced concerns that the siting of solar panels would be likely to channel additional run off during heavy precipitation which would exacerbate problems in the area. Bozeat is a slightly larger village numbering above 2,000 residents. It has historic connections to Roman and Saxon times. The village would be significantly impacted by transport issues and the profound negative changes to the character through the proposal and industrialization of surrounding landscape. Easton Maudit is a peaceful hamlet with a historic church surrounded by productive farmland and close to ancient woodlands. The proposals would surround the village, mask significant archaeological assets which are yet to be fully uncovered, and would coalesce land between the village and Grendon, removing	residents feel they can shape their physical surroundings. The assessment considers that the Scheme is anticipated to have no greater than a long-term, but temporary, minor adverse effect (during construction and in the 5-10 years that follow) – which is not significant. ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed impact to heritage assets as a result of the Scheme. This includes Grade II* Mears Ashby Hall (NHLE 1040699), where it was assessed that the Scheme would result in no harm, and the Grade I Listed Church of St Peter and Paul (NHLE 1189610), where it was assessed that there was a potential for a Moderate adverse effect to occur. Where required appropriate mitigation has been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-049] for embedded mitigation and Section 12.11 for additional mitigation) ES Chapter 12 Cultural Heritage [APP-049], supported by appendices [APP-121 to APP-146 and APP-149] has assessed the potential impact of the scheme on archaeological assets. Where required appropriate mitigation is proposed. See Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] for embedded



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			farmland and access to valued open spaces. Grendon is a small rural community of circa 500 souls, previously owned by Judith of Lens, the niece of William the Conqueror and mentioned in the Domesday book of 1086. The village is a few hundred meters only from Grendon sub-station which is the proposed site for the installation of up to 500mw of BESS and incremental sub-station. The Waendel Walks is an annual walk from Wellingborough which partners with various European towns and attracts a lot of walkers. This year the Walk used the very PRow that would be significantly impacted. This should be assessed as part of the EIA. Mears Ashby is small village of approximately 400 residents nestled in the Northamptonshire countryside with Wellingborough to the East, Earls Barton to the South and Sywell village to the West. It is close to Sywell Country Park and Sywell Airfield. Beckworth Emporium is a large retail, restaurant and garden centre between proposed solar areas C and D sitting on the main road between Sywell and	mitigation and Section 12.9 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146]. The LVIA [EN010170/APP/GH6.2.8] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within ES Appendix 8.1 [EN010170/APP/GH6.3.8.1]. The Applicant has provided an outline drainage strategy in ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] which sets out how sustainable drainage will be incorporated into the Scheme to reduce surface water drainage to no more than greenfield runoff rates. The detailed drainage strategy is secured by Requirement 11 in Schedule 2 to the Draft DCO Revision A [EX/GH3.1 A]. The proposed maximum 60-year operational period is not uncommon, several consented solar DCO projects provide for the same timescales including:



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			Wellingborough. There are five rural minor roads in and out of the village, none of which are classified as HGV routes. Farming on all four sides of the village has played a significant part in the village's history. It is a desirable location with a thriving village school. Greenhill Solar Farm proposal is to surround the village on 3 sides with 1000 acres of solar panels, a 132kv substation and a huge BESS in Area C to the north of the village. There is no mitigation which will prevent the industrialization of the surrounding countryside and create significant negative impacts on the village, its residents and wider environmental damage. Mears Ashby Hall is a Grade II* Listed Building whose setting will be affected by this proposal and should be fully assessed as part of the heritage assessment and LVIA process. Earls Barton is a vibrant small town standing above the River Nene. There is significant concern about cable routes, traffic access and loss of countryside in the vicinity. Walgrave is an attractive rural Northamptonshire village with a	Mallard Pass Solar Farm; Cottam Solar Project; West Burton Solar Project; Gate Burton Energy Park; and Tillbridge Solar Project. It is noted that EN-3 Para 2.10.65 states that "<i>An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation</i>" and does not impose or suggest a year limit is required.



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			population of around 1,000 residents. It is adjacent to productive farmland and has a “quiet” road which is very much valued by residents. Two solar sites of 173 and 65 hectares respectively are proposed which will extend into the parish of Old. The village of Hannington, adjacent to Walgrave, would be seriously impacted by proposed cable routes. Holcot is at the Northern end of the proposed developments. It is also a small (c500 population) and characterful village with a rich history. The village already experiences regular issues with HGV usage at a very tight crossroads. Nearby productive farmland would be significantly impacted by the proposals. A general concern amongst SGHS and local residents across this part of North Northants is that the proposed development will destroy the rural character of the area, will have unacceptable impacts on the villages, will result in a coalescence between the villages, and have cumulative impacts that have not been accounted for in the proposals. In addition, the application for a 60-year tenure for the solar farm is	



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			regarded as highly unusual and in fact almost permanent and in excess of any reasonable period for the life of such a scheme.	
SGHS-007	Energy Need and Policy General	Inappropriate Scale and Location, BESS installation and cumulative effects	Principal Grounds for Objection: 1. Inappropriate Scale and Location - The project spans nearly 2,965 acres (~1,200 hectares) across multiple villages, transforming rural countryside into an industrial zone. - This includes a proposed 500 MW solar photovoltaic (PV) generation facility and a large-scale Battery Energy Storage System (BESS). There is significant concern regarding cumulative impact: • Statera Energy already operates a 49.99MW BESS installation and have secured planning permission for a second 49.99mw installation in the vicinity of the Greenhill Solar proposal (North Northants Council Planning Committee 25/6/25). • The Greenhill BESS of up to 500mw would add a third large-scale lithium-ion battery site in close geographic proximity, which would dramatically increase the industrial scale of battery installations in a concentrated rural setting,	The Statement of Need [APP-556] describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". The Statement of Need [APP-556] provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. Please refer to Chapter 25: Cumulative Effects and Effects Interactions [APP-062] for cumulative impact assessment. The Statera BESS (Application Reference: NW/23/00360) is included in the Transport Analysis in Table 13A3.3 of the ES Appendix 13.3: Cumulative Schemes [APP-154]



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			significantly intensifying risk, infrastructure stress, and environmental pressure. • No cumulative impact assessment has been undertaken and included in the DCO. • The Greenhill BESS site lies 110m from the nearest residential dwellings and 500m from the centre of the village. • There is a requirement for an explicit cumulative assessment under EIA/HRA regulations if additional large-scale BESS is permitted adjacent to an already consented installation. • There is no published Battery Safety Management Plan in the DCO. Other planning authorities (e.g., Suffolk for Sunnica) have refused or delayed BESS approvals until such data is provided.	Impacts on designated sites, habitats and species near to Green Hill BESS will be mitigated through the implementation of embedded mitigation measures to minimise the likelihood and severity of battery fire. The risk of a fire will be moderated through a fire risk management plan, and measures to mitigate impacts in the event of a fire are detailed within an OBSSMP Revision A [EX1/GH7.7_A] and the OOEMP Revision A [EX1/GH7.2_A].
SGHS-008	Other Environmental Matters	Fire and Public Safety Risk	Compound Fire and Public Safety Risks • Multiple BESS installations within a constrained area increase the risk of: - o Concurrent or cascading thermal events.	The Applicant is liaising closely with Northamptonshire Fire & Rescue Services (NFRS) to ensure that all requirements are met for site risk assessments, site familiarisation visits, and training for BESS failure emergency response protocols. In line with established DCO requirements



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			- o Strain on emergency services and fire suppression resources - o Inadequate evacuation planning for Grendon, Easton Maudit, and surrounding hamlets. • No regional fire authority strategy appears to address this cumulative hazard. • The DCO requires submission of a Battery Safety Management Plan (BSMP) (Requirement 9, Schedule 2) pursuant to the Outline BSMP (APP/GH7.7, May 2025). • That document contained in DCO remains an outline, lacking final design-level specifications, plume modelling outputs, and emergency protocols.	the Applicant has submitted an OBSSMP Revision A [EX1/GH7.7_A]. Section 1.1.6 stipulates: By way of requirement that is secured in the DCO, prior to the commencement of construction of the BESS; the Applicant will be required to prepare a Battery Storage Safety Management Plan (BSSMP) which must be in accordance with this Outline BSSMP (OBSSMP). As part of the BSSMP, the Applicant will take into account the latest good practices for battery system failure prevention and detection, consequence modelling, risk analysis, and emergency response planning, as guidance continues to develop in the UK and around the world. Section 6.1.8 of the OBSSMP defines the key safety information which must be included in the final BSSMP, this is secured through the DCO. Section 6 of the OBSSMP stipulates all the Pre-Construction Requirements that must be met and are secured through the DCO. Section 6.1. of the OBSSMP outlines key risk assessments which must be conducted based upon the selected BESS system and site layout, ERP content and incident response protocols are heavily informed by these risk assessments.



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				The Applicant has specified in Section 5.4.4 of the OBSSMP that the ERP will be developed in accordance with NFCC guidance and additional guidance and best practice at the time, sample ERP content is provided. ERPs can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Separate ERPs will be developed for the construction, BESS operations, and decommissioning phases of the project, these can only be drafted once a construction team and operator have been appointed for the project, this information is not known at the DCO stage.
SGHS-009	Hydrology and Flood Risk	Flood Risk Assessment	Flood Risk Compounding • All sites (Statera and Greenhill) lie near the River Nene floodplain, with known Zone 2/3 overlaps. page 12. • A single fire, flood or spill incident could overwhelm shared surface	The Applicant notes the comments. Flood risk has been assessed for the Green Hill Solar Farm in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes [APP-098 to APP-108]. These confirm that the majority of the Order Limits lie in Flood Zone 1, with only limited



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			water systems and affect the Nene Valley SPA/SSSI/Ramsar. • No cumulative Flood Risk Assessment (FRA) or hydrological study has been published combining all three sites. • Absent Flood risk assessment between Weston Favell and Irthlingborough which would take in the River Nene area.	interaction with Flood Zones 2 and 3, and that all sensitive infrastructure including substations and BESS are located in Flood Zone 1 outside the modelled design flood extent. The assessment demonstrates no loss of floodplain storage and no increase in flood risk to third parties. The Environmental Statement applies the cumulative assessment requirements of the NPS EN-1 and EN-3 and the NPPF/PPG on Flood Risk and Coastal Change, considering interactions with other known developments. As required by national policy, each development must be demonstrated to be safe for its lifetime and not increase flood risk elsewhere; on this basis there is no pathway for cumulative off-site flood risk impacts between Green Hill and other nearby schemes. Potential effects on the River Nene and associated designated sites have been assessed in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] and the HRA Revision A [EX1/GH7.21_A], which confirm that no adverse effects on the integrity of the Nene Valley SPA/SSSI/Ramsar will arise.
SGHS-010	Ecology and Biodiversity	Ecological Pressure and potential	Environmental Pollution Burden	The Applicant notes the comments. Hydrological effects have been assessed in ES Chapter 10: Hydrology, Flood



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		pollution contamination	• Ecological pressure: The cumulative hydrological and landscape footprint from multiple sites increases habitat fragmentation, surface run-off routing, and disturbance to protected species. There is a requirement for hydrological and environmental modelling to assess: • Run-off pathways toward the Nene Valley SSSI/SPA/Ramsar sites. • Pollution containment from firefighting or battery breach events. • Cumulative impacts from fire, smoke and chemical leachate on protected species and water bodies • It could significantly impact the ecological character of the Nene Valley protected wetlands, contrary to the Conservation of Habitats and Species Regulations 2017.	Risk and Drainage Revision A [EX1/GH6.2.10_A] the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes [APP-098 to APP-108], and supporting annexes. These confirm that surface water runoff from the Scheme will be managed through sustainable drainage measures with attenuation and exceedance routing provided within the Order Limits. Independent research, including Cook & McEwan (2013) and the BRE National Solar Centre Good Practice Guidance (2014), demonstrates that solar panel arrays do not materially increase runoff. This is because panels are elevated above the ground, allowing rainfall to continue falling between and beneath rows, while rainfall that lands on the panels is shed evenly and dispersed onto vegetated ground rather than being channelled into concentrated flows. The grassland beneath and between the arrays further slows and infiltrates water, reducing the volume and speed of runoff compared with bare or compacted arable soils. The change of use from intensively farmed land to managed grassland is therefore expected to improve soil structure and infiltration, which will reduce



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				the risk of surface runoff and flooding relative to the current baseline. Potential pollution pathways are addressed in ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A], the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A], and Section 5.3 of the OBSSMP Revision A [EX1/GH7.7_A] details how water required for firefighting will be safely contained if a BESS failure event occurs. The outline drainage strategy requires secure impermeable liners, isolation valves and firewater containment with testing and tanker removal if contaminated, ensuring there is no uncontrolled release of firewater, chemicals or other pollutants. Cumulative effects on the River Nene and associated designated sites have also been assessed in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] and the HRA Revision A [EX1/GH7.21_A], which confirm that the Scheme will not result in adverse effects on the integrity of the Nene Valley SPA/SSSI/Ramsar. An assessment of potential impacts on the Upper Nene Valley Gravel Pits SPA, SSSI and Ramsar site is provided in ES



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				Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A].
SGHS-011	General	Cumulative Effects	Planning Policy Non-Compliance • NPS EN-1 (para 4.2.6) and EN-5 require cumulative impacts to be identified, assessed, and mitigated. • NPS EN1 / EN3 – requires public safety “acceptable and appropriately mitigated”- this has not been demonstrated. • Local plans (North Northamptonshire Joint Core Strategy) stress the need to avoid infrastructure clustering that results in environmental harm or cumulative pressure on rural areas. • Buckinghamshire Council recently refused Statera’s Granborough/Buckinghamshire 500 MW BESS development, citing concerns over fire risk, rural landscape harm, and cumulative impact with adjacent solar farms. • The council noted that once a permit area becomes saturated with such installations, the community and environment cannot absorb further infrastructure without significant cumulative harm.	The Planning Statement [APP-559] assesses the Scheme against relevant planning policy and the Policy Compliance Document [APP-567] sets out how the Scheme accords with the relevant national and local planning policy. The Policy Compliance Document addresses compliance with EN-1, EN-3 and the North Northamptonshire Joint Core Strategy. ES Chapter 23: Major Accidents and Disasters [APP-060] assesses the potential for harm to the local population from a major incident. With the mitigation measures secured as part of the Scheme, no significant effects are identified. Please refer to the response to NNC-080 for information on police and crime prevention. Please refer to Chapter 25: Cumulative Effects and Effects Interactions [APP-062] for cumulative impact assessment. This has also been considered in each technical chapter of the Environmental Statement.



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SGHS-012	Ecology and Biodiversity	Cumulative Effects	We respectfully request the Examining Authority to: 1. Require explicit cumulative assessment under EIA/HRA regulations if additional large-scale BESS is permitted adjacent to an existing and additional already consented installation. 2. Assess the cumulative impact of the proposed BESS at Green Hill in conjunction with existing and permitted Statera installations. 3. There is no published BSMP: The Examining Authority should therefore require publication and review of the BSMP before any consent is granted. Unlike Cleve Hill NSIP, the draft BESS safety plan is not included in the DCO documents, nor are key deliverables or performance standards formally defined. • Mandate hydrological and environmental impact modelling, detailing pollutant pathways to the Nene SPA/SSSI/Ramsar. Despite proximity to the River Nene and designated ecological zones (e.g., SPA/Ramsar), the DCO offers no formal guarantees to prevent contaminated run-off, chemical	Please refer to Chapter 25: Cumulative Effects and Effects Interactions [APP-062] for cumulative impact assessment. This has also been considered in each technical chapter of the Environmental Statement. The Statera BESS (Application Reference: NW/23/00360) is included in the Transport Analysis in Table 13A3.3 of the ES Appendix 13.3: Cumulative Schemes [APP-154]. Section 6.1.8 of the OBSSMP Revision A [EX1/GH7.7_A] defines the key safety information which must be included in the final BSSMP, this is secured through the DCO. Section 6 of the OBSSMP stipulates all the Pre-Construction Requirements that must be met and are secured through requirement 5, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. Section 6.1. of the OBSSMP outlines key risk assessments which must be conducted based upon the selected BESS system and site layout, ERP content and incident response protocols are heavily informed by these risk assessments. The Applicant has specified in Section 5.4.4 of the OBSSMP that the ERP will be developed in accordance with NFCC guidance and additional guidance and



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			release, or off-site water pollution in the case of fire or leakage. There is no pollution prevention strategy. • Weigh heavily the precedent of refusal in other rural settings where saturated energy infrastructure led to refusal. • Refuse or require significant redesign of the Green Hill BESS unless cumulative impact and saturation concerns across the cluster of installations are properly mitigated.	best practice at the time, sample ERP content is provided. ERPs can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Separate ERPs will be developed for the construction, BESS operations, and decommissioning phases of the project, these can only be drafted once a construction team and operator have been appointed for the project, this information is not known at the DCO stage. Please also refer to response to EMPM-009 and GrPC-003 for further details in regard to pollution risks.
SGHS-013	Ecology and Biodiversity Landscape and Visual Impact Assessment	Cumulative Effects	Conclusion Permitting Green Hill Solar's BESS (up to 500mw) alongside existing and granted Statera BESS facilities (combined 99.8mw) would create a densely industrialised cluster of battery storage infrastructure in an otherwise rural, sensitive ecological	The Applicant notes this comment. Please refer to the response to ScPC-002' above.



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			setting. This raises material concerns regarding landscape character, emergency service readiness, ecological integrity, and cumulative safety risk—especially given precedents of refusal elsewhere. I urge the Examining Authority to treat cumulative impact as a key factor in its deliberation.	
SGHS-014	Ecology and Biodiversity	BESS location Fire and contamination safety	In Mears Ashby, the developers propose an additional/alternative BESS facility to which the following observations apply: The proposal is for the BESS system for Mears Ashby to be located to the rear of Wood Lodge Farm, near a small private solar array. This location is 20m from a culvert on a stream known as 'Sywell Bottom'. This stream flows south from Wood Lodge Farm into Sywell Reservoir, now known as Sywell Country Park. Sywell Country Park exists on the site of a former drinking water reservoir near the villages of Sywell and Mears Ashby. It covers an area of 280,000sq.m and is run by Northamptonshire County Council. The reservoir is surrounded by meadow trails, a full 4.9km around the perimeter of the Reservoir and is regularly frequented by dog walkers,	The Applicant has submitted as recommended in National Fire Chiefs Council (NFCC) revised guidelines(2024) a Plume Analysis study BESS Fire Emissions Modelling Report [APP-167] to assess the environmental impact of a BESS thermal runaway incident to sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect



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			ramblers, and runners. The reservoir is now recognised as one of the leading tench fisheries in the country as well as an important pike fishery. The reservoir is an important 'open water' swimming venue, which provides safe and accessible swimming for all abilities. Over 100 swimmers attend regularly over the summer months. Greenhill Solar plans to put a BESS in this location (at the rear of Wood Lodge Farm). The proximity to Mears Ashby, Sywell, and Sywell Country Park and Beckworth Emporium, raises legitimate concerns for all the residents and visitors in this area. In the event of a fire or explosion, the release of toxic substances could have severe consequences for local air quality, water quality, farmland, wildlife including residents of local villages such as Mears Ashby, Sywell and Hardwick which are all within a few kilometres of the installation. Should the proposed liner underneath the BESS containers fail and leakage of contaminants occur, from any one of the 92 containers, or	of BESS fire emissions on visibility to the local road network. Section 5.5. of the OBSSMP Revision A [EX1/GH7.7_A] outlines how the Applicant will ensure that there are no significant off-site water or air pollution impacts if a BESS failure occurs. Section 6 of the OBSSMP stipulates all the Pre-Construction Safety Requirements that must be met and are secured through the DCO. Section 6.1. of the OBSSMP outlines key risk assessments which must be conducted based upon the selected BESS system and site layout. One of the key safety objectives of the OBSSMP is to ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community and to ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite. Potential pollution pathways from BESS firewater are addressed in ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A] and the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A]. Section 5.3 of the OBSSMP Revision A [EX1/GH7.7_A] sets out the measures for



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			the automatic valves fail following heavy rain and contaminated water run into Sywell Bottom stream and end up in the reservoir, then the results would be catastrophic. The health and safety and peace of mind of residents and people locally should not be secondary to energy infrastructure until the risks are carefully assessed and mitigated to the satisfaction of the community and independent experts. Given the above, the BESS proposal of Greenhill DCO in Greenhill 'C' should be reconsidered. • - Solar arrays, substations, transformers, inverters, fencing, CCTV towers, and a significant underground cable corridor form the infrastructure.	isolating and containing firewater in the event of a BESS incident. The drainage strategy incorporates impermeable liners, isolation valves, and SuDS measures designed to contain and test any firewater before controlled discharge or tanker removal, ensuring there is no uncontrolled release to adjacent streams or the Sywell Reservoir.
SGHS-015	Agriculture and Soils	Agricultural Land Loss	2. Agricultural Land Loss • - A significant portion of the 1,200-hectare development area is classified as Best and Most Versatile (BMV) agricultural land, including Grade 3a and 3b classifications. • - This land has been used for productive agriculture, and its conversion undermines long-term national food security.	Please refer to the response to comment 'ScPC-002', SBMP-001 and SBMP-002. The Scheme results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing. The land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food



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			The area surrounding Grendon and Easton Maudit is characterised by productive, fertile agricultural land, much of which is Grade 2 and 3a — officially recognised as BMV under the Agricultural Land Classification system. This land has supported cereal, root crop and vegetable production for generations, and continues to contribute to local food supply, rural jobs, and the broader agricultural economy. According to the applicant's own Environmental Statement (ES Chapter 20), approximately 854.5 hectares of the land proposed for solar development — equating to 65% of the total application area — falls within Grades 1, 2 or 3a. This includes substantial areas around Grendon and Easton Maudit. This is in conflict with Planning Policy: Both National Policy Statement EN3 and the National Planning Policy Framework (NPPF) are clear: "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality." (NPPF, para 174) "Applicants should use poorer quality land in preference to land of	production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security. UK Food Security Report 2024 indicates that the 6.0 million hectares of the croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%. The Applicant acknowledges the requirement in paragraph 5.11.12 of National Policy Statement EN-1 that Applicants should seek to minimise impacts on BMV land. The Applicant undertook a five stage site selection process to identify the sites for the Scheme, as reported in ES Appendix 5.1 Site Selection Assessment [APP/GH6.3.5.1]. Further detail is provided in the responses referenced above.



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			a higher agricultural quality and the use of BMV land should be shown to be necessary and justified.” (EN3, para 2.48.3). Island Green Power has not adequately demonstrated a robust site selection process that avoids high-quality agricultural land. Nor have they shown compelling evidence that no reasonable alternatives exist — either on lower-grade farmland, brownfield land, or through rooftop and distributed solar options closer to demand centres. The proposed loss of over 850 ha of BMV land, including productive fields within Grendon and Easton Maudit, represents a strategic and long-term loss of vital agricultural capacity and is inconsistent with national and local planning policy.	
SGHS-016	Agriculture and Soils	Agricultural Productivity and Food Security	Agricultural Productivity and Food Security This area's farmland plays a valuable role in the UK's domestic food production, particularly in the current context of global supply chain disruption, inflation, and climate change. Losing hundreds of hectares of high-grade land — even	The Applicant acknowledges that the importance of farmland and soils for food security. The Applicant has therefore prepared a soil management plan and committed to soil mitigation measures to protect the soils and the land during construction, operation and decommissioning stages, and return the land to its previous functionality and use.



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			temporarily (60 years!) risks undermining future food security. IGP argues that the development is reversible, but this is misleading. A 60-year development is, for all practical purposes, a multi-generational removal of farmland from productive use. Soil compaction, surface drainage disruption, long-term habitat alteration and lack of guaranteed funding for restoration all raise significant doubts about whether the land will be viably returned to agriculture at the end of the project lifespan.	UK Food Security Report 2024 indicates that as of July 2024, around 250,000 hectares of land have been entered into SFI options that temporarily restrict food from being produced on that land. For context, this is the equivalent of around 3% of England's UAA (9 million hectares). The 1200ha land for the proposed Scheme only represents 0.01% of 16.8 million hectares of the utilised agricultural area (UAA) and 0.027% of 4.4 million hectares arable land in the UK and is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will come back to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security.
SGHS-017	Agriculture and Soils	Agricultural Productivity and Food Security	Precedent and Comparison The proposed BMV land take of (65%) is considerably higher than	Please refer to the response to comment 'ScPC-002' and 'SBMP-002'.



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			other NSIPs that have either been refused or were only accepted after significant mitigation. For example: • Sunnica Solar Farm in Cambridgeshire proposed ~40% BMV and faced strong objections based on this. • Longfield Solar in Essex had ~34% BMV land, and the Examining Authority still raised concerns. To allow 65% BMV loss in this case would set a dangerous precedent — especially in a part of Northamptonshire that still retains a viable rural farming economy and food production base.	The 65% of BMV land in the site of proposed Scheme is a consequence of the prevalence of BMV land within this area, as the Likelihood of Best and Most Versatile (BMV) Agricultural Land - Strategic scale map East Midlands Region indicates that Northamptonshire, and most of the central part of the county, is expected to have a high likelihood of BMV land (>60% area BMV). The Order Limits are within an area identified as moderate (20 – 60% BMV) or high (>60% BMV) and the proportion of BMV is therefore typical of the area. Other NSIP schemes have been consented with higher proportions of BMV: • EN010127 Mallard Pass 42% • EN010123 Heckington Fen 49% • EN010122 Oaklands Farm 64%.
SGHS-018	Cultural Heritage Socio-Economics, Tourism and Recreation	Economic effect on agriculture land removal	Local Economic and Heritage Impact The land proposed for solar development supports local family farms, and tenant farmers, in our area. It also shapes the historic landscape of Grendon and Easton Maudit, which are rural settlements with long agricultural heritage, dating back to ownership by the niece of William the Conqueror and mentioned in the Domesday Book of	ES Chapter 12 Cultural Heritage [APP-049], supported by ES Appendix 12.7 Historic Landscape Assessment [APP-147], has assessed the potential impact of the scheme on the historic landscape character. No significant effects were identified on the historic landscape character as a result of impacts caused by the Scheme. Removal of the fields within the Scheme from the agricultural cycle will also help to



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			1086. Removing agricultural use from such a vast area could have economic, cultural and landscape character impacts that extend beyond the application boundary.	preserve remains associated with the medieval agricultural character of Grendon and Easton Maudit. The loss of agriculture associated with the Scheme is not anticipated to have a significant economic or cultural effect, as assessed in in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and ES Chapter 18: Human Health [APP-055] respectively.
SGHS-019	Agriculture and Soils	Irreversible loss of nationally valuable agricultural land	Conclusion The Green Hill Solar proposal submitted would result in the irreversible loss of nationally valuable agricultural land within the parishes of Grendon and Easton Maudit — a decision that would harm local food systems, farming livelihoods and landscape identity. Given the clear policy presumption against building solar projects on BMV land without strong justification — which IGP has not provided — we respectfully urge the Examining Authority to: • Give substantial weight to the strategic value of this farmland. • Recognise the lack of compliance with national and local planning policy.	The proposed development only results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing. In addition, cessation of cultivation and conversion of land currently under arable use to grassland would be a long-term fallow and will remove disturbance on the soils and will result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Sites can serve as a strategic land reserve underpinning national food security. The 1200ha land for the proposed Sites only represents 0.01% of 16.8 million hectares of the utilised agricultural area



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			• Recommend refusal of the DCO application on agricultural land use grounds. NOTE: The policy relating to the use of land and preferences against BMV were re-confirmed in a letter from Secretary of State to Richard Fuller MP in a letter of 17th February 2025. In Walgrave: Presumption against use of best and most versatile land, but >75% of Sites A and A2 is BMV land. Site A has 34% Grade 1 and 2. Site A farm has banner stating 'Proud to grow for Weetabix' and has recently received an award from Weetabix for their crops. (Weetabix factory is < 10 miles away in Burton Latimer and undertakes to source all its wheat from within 50-mile radius). How will this be replaced?	(UAA) and 0.027% of 4.4 million hectares arable land in the UK. UK Food Security Report 2024 indicates that the total area of arable crops increased by 1.3% between 2020 and 2023 and stands at just under 4.4 million hectares. Farms A, B and G all sell some of their produce to Weetabix, but the proposed development involves only between 5% and 17% of the land they farm, and sales to Weetabix only account for a small percentage of the wheat they produce, so the impact will be minimal, and can be addressed within the remaining farmed area. Weetabix seek to source their wheat from a 50 mile radius. 50 miles is 80km. An 80km radius covers just over 2 million ha (2.01 million ha). Taking a national average of non-agricultural land, that means a potential 1.77 million hectares of land. Taking a national average of 68% of land being utilised agricultural land, some 1.37 million hectares are farmed within the 50 mile radius. Local analysis records about 23% of the agricultural land in the East Midlands Region in 2024, and 28% of the Eastern Region, both within the 50 mile radius, to have grown wheat. That suggests that of



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				the order of 315,000 – 384,000 ha of wheat was grown in that radius in 2024. There is unlikely to be a significant adverse effect on the Weetabix plant.
SGHS-020	Ecology and Biodiversity	Ecological sites of protection	3. Environmental and Biodiversity Risks • - The development threatens sensitive habitats, protected species, and wildlife corridors, with inadequate ecological mitigation plans. • - Nearby ecological sites include Dungee Corner Meadow SSSI and woodland habitats supporting bats, brown hares, and nesting birds.	The design of the Scheme has taken into account the presence of ecologically valuable and sensitive habitats (including woodland), and the Scheme has avoided impacts on these features as far as possible. This is evidenced by the retention of almost all woodland within the Order Limits, as well as the range of protective ecological buffers that have been applied to sensitive features, including woodland (20m buffers), ancient woodland (30m buffers), and badger setts (15-30m buffers). Further information on these protective buffers and other measures taken to avoid impacts on sensitive habitats and protected species can be found in the ES Chapter 9 Ecology and Biodiversity [EX1/GH6.2.9_A] and the OEPMS Revision A [EX1/GH7.5_A]. An assessment of potential impacts on Dungee Corner Meadow SSSI is also provided in the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Given the lack of impact pathways between the Scheme and this SSSI following the implementation of mitigation measures



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				such as the OCEMP Revision A [EX1/GH7.1_A] and the OEPMS Revision A [EX1/GH7.5_A] , the assessment concludes that no significant effects are anticipated on this SSSI.
SGHS-021	Ecology and Biodiversity	Potential Impacts on SPA/Ramsar	Potential Impacts on SPA/Ramsar – Golden Plover, Lapwing & Bittern - The DCO's Environmental Statement, GH62.9 Chapter 9 (Ecology & Biodiversity), acknowledges field usage by qualifying bird species: for example, golden plover was recorded at Green Hill B, E, and F, with significant flock sizes over threshold levels; lapwing usage is also evident across multiple sites. - The Habitats Regulations Assessment (May 2025) confirms this site includes “functionally linked land” used by SPA/Ramsar birds, and that Appropriate Assessment is required due to potential effects from construction, operational pollution, water runoff, and disturbance. SGHS Requests: -Compliance with Regulation 64 to ensure that there is no alternative solution that would have a lesser	Wintering bird survey data, including data pertaining to birds associated with the SPA/ Ramsar, is presented in the ES Appendix 9.9 Wintering Bird Survey [APP-092]. The HRA Revision A [EX1/GH7.21_A] also details findings of these surveys, specifically for species associated with the SPA. Figures showing the distribution of qualifying species recorded during the surveys are also provided in both of these documents. As detailed in the ES Chapter 14 Noise and Vibration [APP-051], noise modelling has been completed which shows noise levels associated with construction, operation and decommissioning of Green Hill BESS are comparable to background levels - see Tables 14.22, 14.29 and 14.31. All impacts are deemed either negligible or low, with residual effects deemed not significant. No worsening of effects is brought about by the Grendon Lakes BESS project in combination with the Scheme. It is pertinent to highlight that the BESS compounds themselves lie at least 350m from the SPA boundary, south of



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			impact on the SPA/Ramsar, consider IROPI, and genuine compensation/mitigation measures, not just suggestions. - Publication of all field-level survey data, including maps highlighting field usage by key SPA species. - Quantitative disturbance modelling for construction and operation phases, including worst case scenarios. - Explicit mitigation measures and compensation for loss of habitat outside SPA boundaries, secured through the DCO.	the existing Grendon substation. Tall hedgerows and tree-lines also lie between the Site and the SPA which serve to both attenuate noise and screen visual impacts. ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and HRA Revision A [EX1/GH7.21_A] provide detail on the mitigation and compensation measures required for the loss of Functionally Linked Land. Commitments EB-15 and EB-16 of the ES Chapter 27 Commitments Register [APP-064] will secure creation, enhancement and management of these areas. The HRA Revision A [EX1/GH7.21_A] concludes that with the adoption of mitigation measures, no adverse effects on site integrity of the Upper Nene Valley Gravel Pits SPA or Upper Nene Valley Ramsar are deemed likely, either in isolation, in combination, or cumulatively.
SGHS-022	Ecology and Biodiversity	Risk to SSSI	Risk to SSSI – River Nene Hydrology & Contaminants - Chapter 22 of the PEIR identifies the River Nene, a SSSI, SPA, and Ramsar water body, about 620m north of the BESS site. It confirms that the cable corridor crosses surface watercourses and could	The project has committed to the implementation of protective ecological buffer zones around sensitive habitats, including watercourses, which vary in size based on the sensitivity and ecological value of the habitats/features in question. Further information on protective buffers is provided in the ES Chapter 9 Ecology



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			cause moderate impacts to controlled watercourse mitigation. - The HRA also highlights risks from waterborne pollution, with potential long-term effects on the River Nene's hydrological regime and water quality. Requests: - Enforceable 50m vegetated buffer zones from all watercourses tied to the SSSI/SPA. - Full water quality and hydrology modelling showing neutral or positive impacts from the cable corridor and BESS run-off. - Binding commitments to limit pesticide/fertilizer use in adjacent land, and full pollution controls included in the DCO requirements. - Appropriate assessment re BESS and substation fire safety regulations. Regulation of BESS installation, prevention of contamination from lithium, fluoride and other chemicals present in BESS which have a history of catching fire and causing ecological disaster.	and Biodiversity [EX1/GH6.2.9_A] and the OEPMS Revision A [EX1/GH7.5_A]. It is assumed that the Relevant Representation refers to the Upper Nene Valley Gravel Pits SPA, Ramsar and SSSI. A full assessment of impacts on these designated sites, as well as a separate impact assessment on watercourses, have been provided in the ES Chapter Revision A [EX1/GH6.2.9_A]. With mitigation measures considered, this assessment concluded that all potential impacts identified could be avoided/mitigated in full, and therefore the residual effect on these designated sites would be neutral. Additionally, the HRA Revision A [EX1/GH7.21_A] assesses each impact pathway on the integrity of the SPA/ Ramsar, both in isolation and cumulatively with other projects. With mitigation, no adverse effects on integrity were predicted. Management of habitats within the Order Limits is detailed within the OLEMP Revision A [EX1/GH7.4_A]. Commitments to limit pesticide and fertiliser use in adjacent land outside the Order Limits is not within the Applicant's control. Please refer to the Applicant's response on GrPC-003 for further information



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				relating to pollution prevention and control measures in proximity to the Upper Nene Valley Gravel Pits SPA, Ramsar and SSSI. In respect of hydrology and flood risk, the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and associated annexes demonstrate that run-off from all developed areas, including the BESS and substations, will be controlled to greenfield rates with exceedance flows routed safely within the site. No increase in flood risk or adverse impact to water quality receptors will result. Cable route watercourse crossings are secured through HDD at Main Rivers as set out in FRA DS Annex A: Cable Route [APP-098 and APP-099], avoiding direct impacts to designated watercourses. With regard to buffer zones, embedded mitigation secured in the OCEMP Revision A [EX1/GH7.1_A] requires protection of watercourses during construction and prohibits uncontrolled discharges. Vegetated margins are retained along watercourses where practicable, and this will be detailed further at the design stage through the DCO Requirements process. Section 4 of the OBSSMP Revision A [EX1/GH7.7_A] details the critical BESS



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				safety requirements to prevent or fully mitigate a BESS failure event. At the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. Section 6 of the OBSSMP details the Pre-construction Information Requirements which the Applicant must provide, and this is secured through Requirement 6, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A].
SGHS-023	Ecology and Biodiversity	Protection of Schedule 1 & Priority Species	Protection of Schedule 1 & Priority Species – Bittern & Reedbed Birds - DCO ecology data notes the presence of reedbed habitats and confirms occasional bittern detections offsite, adjacent to the SPA/Ramsar boundary. - It is known that the Bitten visits the Pastures Farm Reedbed every year, not occasionally as stated in the DCO. The bitten is a very rare bird that deserves protection from dust, polluted water sources and fire risk. Requests:	A full suite of breeding and wintering bird surveys has been completed, which encompasses all land within the Green Hill BESS site and the additional field to the north, closest to the SPA, which is now removed from the Order Limits. Details of these surveys can be found in ES Appendix 9.8 Breeding Bird Surveys Revision A [EX1/GH6.3.9.8_A] and ES Appendix 9.9 Wintering Bird Surveys [APP-092]. The HRA Revision A [EX1/GH7.21_A] concludes no adverse effects on the integrity of the SPA via disturbance of qualifying species within the SPA. As



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			Targeted surveys for reedbed birds during sensitive seasons (e.g., breeding, overwintering), with a full assessment of risks and potential disturbance. That all cable installation, BESS erection, or vegetation removal be conducted outside those sensitive periods. Implementation of compensatory reedbed creation or enhancement, with details secured through a DCO Requirement. But preferably for the BESS to be relocated away from the ecological areas of protection.	such, restrictions on the timing of construction/enabling works at the Green Hill BESS site are not considered necessary. No reedbed habitat will be adversely impacted as a result of the proposals, and no compensation is therefore deemed to be required. Please refer to the Applicant's response to GrPC-003 in relation to pollution prevention measures and disturbance.
SGHS-024	Ecology and Biodiversity	Incomplete Cumulative and BNG Assessment	Incomplete Cumulative and BNG Assessment - Chapter 9 and the HRA do include cumulative effects sections, but the focus is heavily weighted toward landscape and hydrology, with insufficient detail on in-combination ecological impacts. - The ecological chapter includes biodiversity net gain (BNG) projections, but specific baseline data, habitat targets, and monitoring measures are primarily detailed only in technical appendices. Requests:	The assessment of cumulative impacts takes into consideration projects within 10km of the Scheme of a similar size and/or character. The ES Chapter 25 Cumulative Effects and Effect Interactions [APP-062] details these projects and their cumulative and in-combination effects. The ES Chapter 9 Ecology and Biodiversity [EX1/GH6.2.9_A] lists these projects and identifies the risks of cumulative impacts on each important ecological feature. The HRA Revision A [EX1/GH7.21_A] lists these projects and identifies the risks of cumulative impacts



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			- Publication of comprehensive cumulative assessments combining this scheme with others within 10km of the SPA (e.g., other NSIPs or local developments). - Full disclosure of BNG metric calculations for each habitat type, showing delivery, management, and monitoring over a 30-year period. - A dedicated Ecological Management Plan inclusive of proactive monitoring, adaptive management, and clear reporting commitments. - In-combination ecology assessments; full BNG metrics; long-term management plan - Trees and Hedgerows: Development of the solar farm would have a major impact on trees and hedgerows across the area. In practice the damage resulting from the installations and cable routing will probably not be mitigated. In Walgrave: Sites A and A2 are characterized by mature trees in hedgerows, and there is a notable row of 12 oaks along the Green Lane, and veteran ash trees on Newland Road. The GHS tree map and impacts document in DCO only	associated for each identified potential impact pathway on the SPA. Biodiversity Net Gain (BNG) calculations have been completed and the final Metric shall be submitted following recently permitted survey access to the last areas of the Order Limits. Please see the response to WNC-026 regarding BNG. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A]. Full management and monitoring measures will be set out in a detailed Landscape and Ecological Management Plan post-consent, which will be secured as a by the DCO. Anticipated tree and hedgerow losses have been calculated and are detailed in the ES Chapter 9 Ecology and Biodiversity [EX1/GH6.2.9_A] and ES Appendix 9.13 BNG Assessment Revision A [EX1/GH6.3.9.13_A]. Whilst some tree/hedgerow losses will occur, losses will be mitigated, and a significant net gain in the extent and quality of hedgerows and in Hedgerow Biodiversity Units will be delivered. A full suite of breeding and wintering bird surveys has been completed across the Sites. Details of these surveys can be



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			notes 3 of the 12 oaks, even though 1 is veteran and the others older mature. Both sites are rich in birdlife and other wildlife, for example Site A has a high number of skylarks, ground-nesting birds which will be significantly adversely impacted by the scheme, and they are on Red List of Conservation concern. There are always many yellowhammers nesting in the hedgerows along Newland Road and the Green Lane, they are also Red listed, need grain in the fields to feed their young. Red kites are present and probably nesting on both sites – Schedule 1 birds whose nesting sites should not be disturbed March – July.	found in ES Appendix 9.8 Breeding Bird Surveys Revision A [EX1/GH6.3.9.8_A] and ES Appendix 9.9 Wintering Bird Surveys [APP-092]. Mitigation for species protected under Schedule 1 of the Wildlife & Countryside Act 1981 are detailed in the OEPMS Revision A [EX1/GH7.5_A]. The impacts of the Development on trees (excluding hedgerows) have been assessed in ES Chapter 19 Arboriculture [APP-056], its supporting appendix ES Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171] and the supporting Tree Impact Plans GH6.4.19.2.1 - GH6.4.19.2.30 [APP-501 to APP-530]. Across all the Sites, including Site A and Site A.2, all veteran and ancient trees have been recorded. For non-ancient and non-veteran trees, only the largest tree on each field boundary has been recorded in order provide an overall buffer to Development that avoids tree impacts. This survey approach explains why not all mature oaks along Green Lane have been surveyed. In addition to the above survey approach, further targeted tree surveys were carried out where Development was anticipated to impact trees. For Green Lane in Site A, ES Figure 19.2.1 Tree Impact Plan Green Hill A Sheet 1 [APP-



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				501] confirms that no tree removals or impacts are anticipated from the Development to trees adjacent to Green Lane. Arboricultural mitigation and compensation for tree impacts within the Sites and along the Cable Route Corridor have been secured in the Outline Arboricultural Method Statement within ES Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171].
SGHS-025	Cultural Heritage	Heritage Asset Impacts	4. Heritage Asset Impacts within ~5 km - The area includes over 300 listed buildings within 5 km, including 10 Grade I assets such as the Church of St Peter & St Paul (Easton Maudit). - Historic footpaths and ridge-and-furrow fields are under threat of visual and physical degradation. Significant local findings from trench investigations emerged during preparation of the DCO. It is understood that around Easton Maudit there are Roman era artefacts, including a burial area. There is also an indication of a	ES Chapter 12: Cultural Heritage [APP-049], supported by Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed the potential impact of the scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Chapter 12: Cultural Heritage [APP-049] for embedded mitigation and Section 12.11 for additional mitigation). Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120] details assets scoped in for assessment and was used during consultation with Historic England and the local planning authorities. Scoped in assets are considered to be agreed with both stakeholders. Where required appropriate mitigation has been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-



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			henge (probably wooden) and of other stone age (or earlier) artefacts. Comment from the Northants specialist archaeologist also relates to the need for additional research. Geophysical observations were limited to the proposed BESS site and further groundwork investigations requested. Given the proximity of the proposed BESS site to the previous discovery of the Lyngby Axe of the Upper Paleolithic Era (British Museum no. 1986, 1002.1)– an artefact of significant international importance, this is considered essential. Around Mears Ashby there is an important designated heritage asset which has not been fully accounted for: The WW11 crash site is recorded on the Northamptonshire Historic Environment Record HER no 1995/0/8, recorded as a monument 'World War11 Aircraft Crash sites. Details: on the 31st of March 1943 two Flying Fortress B17 bombers collided in midair and crashed to the east and southeast of Mears Ashby. a total of 15 crew were killed. (Mission 48). A Memorial Plaque is	049] for embedded mitigation and Section 12.11 for additional mitigation). This includes setting back panels in fields adjacent to Wilby Road. A Moderate adverse effect would occur as a result of the Scheme on the setting of Mears Ashby Conservation Area and the Grade I Listed Church of St Peter and St Paul (NHLE:1189610) (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). The Grade I Listed Church of St Peter (NHLE: 1281745) and Scheduled Abandoned areas of Walgrave Medieval village (NHLE: 1418583) were scoped out of assessment as no impact was identified as a result of the Scheme (see Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]). ES Chapter 12 Cultural Heritage [APP-049], supported by appendices [APP-121 to APP-146 and APP-149] has assessed the potential impact of the scheme on archaeological assets. This includes consulting the HER records, which were used to inform the Desk-based research (ES Appendix 12.2 Archaeological Desk-Based Assessments [APP-121 to APP-127]). Where required appropriate mitigation is proposed. See Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] for embedded mitigation and



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			located at the corner of Duchess End Mears Ashby on a small grass island. There is also a memorial plaque in the Aircraft Museum at Sywell Aerodrome. The locations of the remains of the 2 bombers and the bombs are also shown on plaque along with other important details. 15 crew were killed, 3 survived. We have identified a corridor of land (a plan for this is available) which we wish to maintain as the memorial site. We also know that this corridor between the 2 crash sites contains a significant amount of unexploded ordnance and remains of the 15 crew. One of the survivors came over to the UK and put together all the information with local enthusiast "Richard Watts." We know that all military sites are protected under "The Protection of Military Remains Act 1986" and it is an offence to tamper with, damage, move or unearth any items at such sites unless the MoD has issued a license authorising such activity. We are keen to protect this important above and below ground asset and expect the developer to	Section 12.9 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146]. All archaeological evaluation works have been completed in consultation with the representative to the local planning authority and Historic England. No development is proposed within the Fields EF9 and EF26 where WW2 crash sites are recorded within Site E. Where archaeological evaluation has been undertaken in surrounding fields, no remains associated with the crash were encountered. Therefore, there is no potential for impacts to crash sites as a result of the Scheme in Site E. See the response to SGHS-030 for information on PRow and visual landscape designation concerns.



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			comply with the Design requirements and locate infrastructure at a suitable distance from the crash site. As a minimum we would expect panels to be removed from EF13, EF14, EF10, EF22, EF24, & EF21. The developer does not appear to have consulted the HER records or the Local Authority as defined in 12.3.11 and therefore has made no attempt to ensure protection of this important heritage asset. The design is not sensitive to above and below ground heritage assets. The developer needs to read and take cognisance of the prescribed requirements of the Environmental Statement. Given that the village of Mears Ashby is a Conservation Area, we also believe the panels along the length of Wilby Road, adjacent to the road, should all be removed, to enhance the approach to the village and the memorial site. In Walgrave: Many PRow south and southeast of village with northerly views – Walgrave St. Peter's Church (14th century, Grade 1 listed) will be seen over wide distance with backdrop of solar panels along the horizon. The setting of several	



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			scheduled monuments in the village, close to Sites A/A2 will also be adversely impacted by industrialization of the countryside. These include medieval moated manor (near Newland Rd), medieval fishponds (Hall Farm), and site of original village with ridge and furrow (Atterbury's).	
SGHS-026	Landscape and Visual Impact	Visual and Landscape Designation Concerns	5. Visual and Landscape Designation Concerns - Villages including Walgrave, Holcot, Mears Ashby, and Earls Barton will be visually affected by extensive solar infrastructure and cabling corridors. - Despite no national landscape designation, the area is valued locally for its character and views. The historic English villages associated with the proposed development are Lavendon, Bozeat, Easton Maudit, Grendon, Earls Barton, Mears Ashby, Walgrave, and Holcot. Nearby villages – Sywell, Old, Strixton, Cogenhoe, and Hannington will also experience impacts if the development is approved. Photographs accompanying the DCO have purported to show the limited visual	ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] includes an identification of Landscape Value in accordance with the Landscape Institute Technical Guidance Note 02/21, Assessing landscape value outside national designations. ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] contains detailed Landscape Value Assessments for each Study Area for each of the individual Sites (including BESS). Landscape value is based on factors such as natural and cultural heritage, its condition, associations, distinctiveness, and recreational opportunities and how it is perceived. For details on how landscape value is assessed please refer to ES Appendix 8.1 LVIA Methodology [APP-078 and APP-079]. Appendix 8.1 provides criteria for determining landscape value for both designated and undesignated landscapes.



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			impact of the development. These photographs are not acceptable because they are taken from the “wrong” position and do not represent the images that would be on display if the development proceeds. Each of these villages has an individual character which will be severely impacted by developments taking place between them. There will inevitably be an impact on the health and wellbeing of residents from the installation and the loss of rural amenity. In Walgrave sites are in a rural setting, they reach by gentle slopes to the highest points in the local topography at 136m. So, zones of visibility are wide and extensive, particularly of Site A. There are significant cumulative effects – for example, the Kettering Road from the village to A43 will have solar panel industrialization visible on both sides of the road. Furthermore, the cumulative effect of connecting up the urban/industrial areas of Northampton with Kettering by covering large areas of countryside in the remaining gap around Walgrave, Hannington and	ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] includes a suite of viewpoints that cover a wide range of visual receptors, including public locations such as transport routes, PRow and residential properties. Viewpoints have been selected to represent the experience of different types of visual receptor, including users of PRow, residential properties, transport routes, heritage, and recreational sites. Selected viewpoints include specific locations that are popular vantage points or tourist destinations, and those suggested through Section 42 and Section 47 consultation. Viewpoints have also been selected to illustrate landscape character effects or likely Cumulative Effects of the Scheme. A series of ‘representative and specific viewpoints’ are shown on Figures 8.10 [APP-308] to 8.10.5 [APP-313]. Verified photography and photomontages are shown on Figure 8.14.1[APP-334] to Figure 8.14.NN13 [APP-400]. There are a total of 64 viewpoints covering the Study Areas for the Sites and the Cable Route Corridor. These viewpoints comprise initial viewpoints selected for the purpose of the assessment and likely to be affected by the Scheme and then additional viewpoints provided as part of



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			Holcot. Far reaching views from within Site A (Green Lane, see below) will be encircled with solar panels, and have solar panels in the distance Site A2. In Bozeat, the village will feel that it is surrounded by solar farms with the 3 most used routes passing through multiple solar sites including existing solar schemes.	the Section 42 Consultation. The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation, where a total of 13 additional viewpoints have been included and photography undertaken, these are identified as Viewpoint Number NN1 – NN13. The viewpoint locations are shown on Figures 8.10.1 [APP-309] to Figure 8.10.5 [APP-313] and the Verified Photography and Photomontages are shown on Figures 8.14.1 - 8.14.NN13 [APP-334 to APP-400]. A series of photomontages have been produced to show the effects of the Scheme at locations where significant effects were considered likely to occur. Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives for North Northamptonshire and Milton Keynes City Council. A total of 26 AVR level 3 montages have been produced using summer and winter photography as illustrated in Figures 8.14.1 - 8.14.NN13 [APP-334 to APP-400] and as set out within Table 8.6 of the LVIA. The Scheme comprises a series of independent areas of land or Sites set



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRow and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme will not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				conservation and retain the existing landscape pattern. This 'network of sites' approach demonstrates good design by allowing for a fine-tuning approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing, and provide enhanced landscaping and vegetation. This demonstrates how the Scheme is sensitive and responsive to place. The LVIA includes an assessment of the Cumulative Effects of the Scheme based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views) visibility. The LVIA found that Sequential Effects are not considered to be any greater than those effects identified for the individual sections as set out within ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A].
SGHS-027	Other Environmental Matters	Battery Energy Storage System	6. Battery Energy Storage System (BESS) Safety Concerns	The Applicant is liaising closely with Northamptonshire Fire & Rescue Services (NFRS) to ensure that all requirements are met for site risk assessments, site



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
		(BESS) Safety Concerns	- The proposed BESS poses a significant fire and explosion risk, especially near Grendon and flood-prone areas. - Emergency response protocols for BESS incidents are underdeveloped and raise safety concerns. See comments above.	familiarisation visits, and training for BESS failure emergency response protocols. In line with established DCO requirements the Applicant has submitted an OBSSMP Revision A [EX1/GH7.7_A] . Requirement 6 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] provides that prior to the commencement of construction of the BESS, the Applicant will be required to prepare a Battery Storage Safety Management Plan which must be in accordance with the outline plan. The plan must be approved by the local planning authority who must consult with Northampton Fire and Rescue Service and the Environment Agency.
SGHS-028	Consultation	Inadequate Community Engagement	7. Inadequate Community Engagement - Residents report the consultation process was inaccessible, overly technical, and lacked genuine consideration of alternatives. - Options such as smaller distributed solar schemes or rooftop integration were not explored in good faith. One example of the problem this has caused has arisen in the village of Hannington, adjacent to Walgrave: Cabling route passes from Site A2, across bridleway and into edge of	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Chapter 4 of Consultation Report Revision A [EX1/GH5.1_A] describes the Applicant's approach to non-statutory consultation, including early engagement meetings and Early Engagement Workshops where community groups,



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Hannington village between pond and light industrial estate, then across Red House Lane passing fairly close to backs of houses, and near to footpath across fields to A43, then next to A43 close to bridleway. Local people were prevented from understanding the implications of this route as it had not been narrowed down and specified at the time of public consultation which finished in December 2024. Therefore, in effect, NO public consultation has been held on the implications and effects of this to the residents of Hannington.	local council and parishes were invited to share their insights on early design ideas. Chapter 7 and Chapter 8 of Consultation Report Revision A [EX1/GH5.1_A] describe how the Applicant undertook a six-week statutory consultation on the Scheme, during which the Applicant presented the consultees with a preliminary environmental information report (PEIR). A non-technical summary was published to accompany the PEIR, and a consultation brochure was published to help consultees understand the proposals and the potential significant effects of the Scheme. Before carrying out this statutory consultation, the Applicant consulted with the host local authorities about the strategy for consultation, with the feedback provided being considered and incorporated into the final Statement of Community Consultation [APP-028]. The statutory consultation was carried out in accordance with the SoCC. During the statutory consultation, the Applicant held four in-person exhibition events and three webinars to present the Scheme and directly respond to queries from consultees. Chapter 10 of Consultation Report Revision A [EX1/GH5.1_A] describes the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				significant volume of responses received from Section 42 consultation and Section 47 consultation, including the issues raised and how these were considered by the Applicant. The Applicant notes Adequacy of Consultation Responses (AoC 001 – AoC- 015) where consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out.
SGHS-029	Transport and Access	Traffic and Transport Concerns	8. Traffic and Transport Concerns It is evident that the applicant for Greenhill Solar has failed to fully assess and consider the issue of installation traffic either for the BESS installation or for the delivery and installation of solar panels. Greenhill solar undertook a “targeted consultation” in April 2025, after the main consultation had been completed, in which they identified a number of rural routes earmarked for traffic controls and/or local widening of access routes. These maps were	An assessment of construction traffic is provided in ES Chapter 13 Transport and Access [APP-050]. The submission includes an OCTMP Revision A [EX1/GH7.9_A] to manage HGV and worker traffic movements. The detailed CTMP, to be approved by the relevant planning authority, is secured by Requirement 15 in Schedule 2 of the Draft DCO Revision A [EX1/GH3.2_A]. Please see the response to SGHS-032 for information on the consultation process and community engagement.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			poorly presented and confusing to local residents who were unable to determine exactly what was being proposed and where. Greenhill Solar also failed to respond to certain questions during the consultation. For example, they were asked to confirm plans to build a hard surface access route from the A509 to Easton Maudit for delivery of solar panels. No clear answer to this question was received. Furthermore, it is now understood that the delivery route of the BESS units, which had been proposed to cross the Nene below Earls Barton has now been changed to delivery through Cogenhoe. This presents significant other challenges that are unacceptable to local residents. Around Mears Ashby the adequacy of the road network is questionable: None of the roads are suitable for HGVs. The carriageway surface is already breaking up at the verge edges. One of the prescribed HGV routes in this proposal is along Mears Ashby Road, from the traffic lights on the A4500 to access F2, (all residential and the main footpath to Sywell Country park) for one field of solar panels. (EF 33). The solar	With specific respect to Cogenhoe and Whiston, HGV traffic is to be routed to and from the A45 via <u>Station Road</u>, to the cable route and Green Hill BESS site. The route through Cogenhoe village is not proposed as an HGV route but may be used by some workers and is required to transport a small number of Abnormal Loads. The HGV routes avoid Mears Ashby. The route via the A4500 is required only for a small proportion of Green Hill E. Movements across Newland Road will be carefully managed through bankspersons. Visibility splays at proposed access points are shown in accordance with recorded speeds. The use of Temporary speed Restrictions may also be used and the Works Plans allow for this. The principle of access points associated with the Scheme are presented in ES Appendix 13.2 Transport Assessment Part 3 of 3 [APP-153]. This shows how access points might be formed to accommodate vehicle movements and provide suitable safety considerations such as visibility splays. The associated Works Plan Revision B [EX1/GH2.4_B] and provisions in the Draft Development Consent Order Revision A [EX1/GH3.1_A] identify how access point



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			array in field EF 33 should be removed as a minimum, to ease the traffic situation. In Walgrave: Construction traffic is due to cross Newland Road to access the west part of the Site, near the Green Lane, which would be hazardous and disruptive to users for recreation. After construction, neither route would offer the quiet retreat in nature that it does currently. Site A access for all construction traffic is close to unsighted double bends in Broughton Road. All construction traffic will access west side of Site A through fields on east side (removing hedgerow), then crossing Newland Road, Quiet Lane, near Green Lane. Construction traffic entering Site A2 on Kettering Road from A43 – busy commuting route in rush hour, and route for some to Walgrave Primary School. Access for cabling route on Kettering Road is close to blind dip in the road, so it is a potential hazard while manoeuvring. In Bozeat: Impact upon the village of traffic using site entrance F2 during construction, repowering, and	may be designed and how appropriate traffic management might be used.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			decommissioning. This is most acute where access routes include residential streets, some of which are not acknowledged as residential in the DCO and where the severity of the impact is anyway understated in the methodology. Congestion and safety on the A509 during construction, repowering, and decommissioning. There have been fatalities and long delays during previous traffic restrictions on the A509, which is a heavily used commuter route.	
SGHS-030	Glint and Glare	Inadequate assessment	9. Glint and Glare Issues of glint and glare have not been adequately considered. Please note that these rural areas have horse riders and horse-riding businesses which will be affected by the glare from panels (and impacted by the increase in HGV traffic). Recommendations for the Applicant: Due to the Applicant's incomplete and deficient assessment of the effects of glint and glare, the following course of action is strongly recommended. The Applicant should: a. Broaden their assessment to take account of actual observer heights.	The assessment considered receptors along Public Rights of Way (PRoW) and horse facilities. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors, rather than the amenity. As outlined in The ES Chapter 15 Glint and Glare [APP-052] in section 15.4.21, the sensitivity of PRoW and horse facilities have been categorised as 'low', and the maximum magnitude of impact for PRoW and horse facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. The assessment has considered agricultural receptors. In line with industry guidance, the assessment considered the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			These should include the upstairs windows for residential receptors (10m), agricultural vehicles (4m), and equestrians (2.5m). b. Re-commission the report if 4.5m high/ tracking panels are being considered. c. Apply standard industry criteria, where more than 30 minutes of glare per day/30 hours per year is assessed as having a high impact. d. Take account of the combined reflective capacity of all of the materials used in the construction of the solar PV scheme [frame/ support structure] e. Comply with Advice Notice 17 and assess the combined glint and glare effects of all solar farms in the region. The daily exposure to glare should be the cumulative period from all solar schemes [Irchester/ Great Doddington and the potential development at Hall Farm]. f. Take account of the effects of glint and glare of all receptors with eyesight diseases or deficiencies. g. Take account of the effect on livestock and equestrian activities, using an equestrian expert.	impacts of glint and glare on the safety of these receptors, rather than the amenity. As outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.22, the sensitivity of agricultural workers has been categorised as 'low', and the maximum magnitude of impact for agricultural workers is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. As outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.4, 'whilst a solar panel's frame and structure may be reflective, the potential glare is less significant than the total panel area'. Modelling the total panel area is considered worst case, as the reflectivity of the glass surface is considered to be higher than the materials used for the frame and structure. As outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.11.2 to 15.11.5, cumulative impacts upon light-sensitive receptors have been considered. Potential cumulative glint and glare impacts are possible from nearby solar farms that are within the relevant screening distances of each receptor. One such solar farm exists: Sywell Road Solar Farm. Cumulative impacts have been considered towards relevant aviation and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			h. After reassessing the potential for glint and glare, the mitigation applied by the Applicant for all receptors should be reducing the height of the PV panels until the impact is no longer significant. i. Undertake consultation with affected parties; airfields, landowners, businesses, interested parties, etc. j. Reassess glint and glare on 'B' class/ un-classified roads. In Walgrave: Many properties on the north/east side of village will be affected by glare for 6 months per year. Downgraded in DCO to 'low impact' by 'professional judgment'. Many viewpoints along the A43 travelling north where glare from nearby Site A2 and distant Site A will regularly occur; likely hazard to traffic safety on road with history of serious/fatal accidents. Impact stated as 'low' partly because often 'cloudy skies'.	ground-based receptors from Sywell Road Solar Farm and Green Hill C, Green Hill D, and Green Hill E of the Scheme. It concluded that 'there are not considered to be any likely significant cumulative effects in conjunction with this development' in section 15.11.4 in ES Chapter 15 Glint and Glare [APP-052].
SGHS-031	Socio-Economics, Tourism and Recreation	Impacts to the local community	10. Recreation / Social / Health In Walgrave: Site A is situated on either side of Newland Road, a single-track lane about 1 mile in length extending north from the village, past the village hall and playing field. This road has a long	Please refer to the Applicant's response to SAMP-006 with respect to Newland Road and the green lane, and their recreational use. The proposed impacts on recreation and access to open space and leisure are assessed in ES Chapter 17: Socio-



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			history of use for recreation by villagers, and as such was designated formally as a 'Quiet Lane' by Northamptonshire County Council in 2013 as requested by Walgrave Parish Council. (Definition of a Quiet Lane – a designated minor rural road intended to pay special attention to the needs of walkers, cyclists, horse-riders and the mobility -impaired.) Branching off Newland Road is a Green Lane extending about 0.65 miles between fields, originally leading to a farmhouse, now dilapidated. This has been used for recreation in long living memory, particularly by dog-walkers, and is acknowledged as a permissive path. This will be enclosed by fields of solar panels. GHS DCO documentation has minimal inclusion of the fact of the Quiet Lane designation and does not recognise it for its purpose. It also does not acknowledge the Green Lane as an established permissive path, unlike other permissive paths elsewhere. Therefore, the submitted information avoids any discussion of the significant impact of the development on these valued and	Economics, Tourism and Recreation [APP-054] and in ES Chapter 18: Human Health [APP-055] and find no significant effects to receptors in Old or Walgrave. The Acorn Centre, which hosts The Seeds of Change, has been assessed as an equestrian facility in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] and for its role as a social care facility in ES Chapter 18: Human Health [APP-055]. Under both assessment criteria, no significant effects have been assessed subject to implementation of mitigation. Mitigation measures have been established following consultation with the Acorn Centre to move the onsite substation away from the Acorn Centre to avoid significant effects.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			well-used areas for recreation in nature and peaceful surroundings. A survey of villagers in August 2024 showed that 85 of 95 respondents used Newland Rd/Green Lane for recreation. The Acorn Centre is an equine facility located on Newland Road, close to the Green Lane – its main purpose is as a therapeutic learning centre for children and young adults with barriers to learning and functioning. Their work will be very significantly impacted by the proximity of the solar panels.	
SGHS-032	Alternatives and Design Evolution	Final Statement	Summary Position While acknowledging the importance of renewable energy, SGHS assert that the scale, location, and anticipated impacts make this project unsustainable and disproportionate. We urge the Planning Inspectorate to refuse the proposals in their current form, or require a substantial redesign that respects local heritage, farmland, biodiversity, and landscape character. SGHS request full participation in the Examination phase, including rights to make written and oral	The Applicant notes this comment



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			submissions on behalf of our community. Further evidence of the above and related matters will be submitted during the course of the Examination and through a Written Representation. This submission forms Appendix A as part of a Relevant Representation by SGHS who wish to present directly to the ExA detailed and local knowledge and wish to be considered an Interested Party under Section 102(1) of the Planning Act 2008. Submitted by Andy Anderson MRTPI For and on behalf of Stop Green Hill Solar.	
SGHS-033	General	Objection summary	Appendix 2 Stop Green Hill Solar (SGHS) Relevant Representation – PINS Ref EN010170 Anti Green Hill Solar: Objection Report to the Proposed Green Hill Solar Farm Date: 18th July 2025 Prepared by: Gary Elliott and Chris Bailey Subject: Formal Objection to the Proposed Green Hill Solar Farm Development Executive Summary	The Applicant notes this comment and has responded to the objections on a topic-by-topic basis below.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Anti Green Hill Solar strongly objects to the proposed Green Hill Solar Farm due to its irreversible impact on nationally valuable farmland, threats to long-term food security, and a lack of justification given the availability of more appropriate development sites. This proposal fails to demonstrate sustainable land use and ignores more responsible alternatives. It must be rejected in the national interest.	
SGHS-034	Agriculture and Soils	Misuse of High-Quality Agricultural Land	1. Misuse of High-Quality Agricultural Land The proposal would industrialise 66% of Grade 1–3 agricultural land—the most fertile and productive in the UK. Once covered with solar infrastructure, this land will be removed from the food system for decades, with uncertain prospects of full restoration. In the past 12 years, over 14,000 hectares of prime farmland have been lost to development for just 287,864 homes—a deeply disproportionate trade-off. At a time when the UK faces increasing global supply shocks, climate threats, and rising population pressures, the long-term loss of	The proposed development only results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing, contributing to food production. The land will return to full agricultural use after the project lifecycle. The land under grassland use would be a long-term fallow and will enhance the quality of the soils and land in long term. The land for the proposed Scheme can serve as a strategic land reserve underpinning national food security. The 1200ha land for the proposed Sites only represents 0.01% of 16.8 million hectares of the utilised agricultural area (UAA) and 0.027% of 4.4 million hectares arable land in the UK. UK Food Security Report 2024 indicates that the 6.0 million hectares of the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			such land is both short-sighted and reckless.	croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%.
SGHS-035	Agriculture and Soils	Misuse of High-Quality Agricultural Land	2. The Loss Is Unnecessary and Avoidable This proposal cannot be justified on the basis of land scarcity. In fact: There is a plentiful supply of brownfield land across the UK that could accommodate renewable energy infrastructure without displacing food production. Solar development should prioritise: • Previously developed (brownfield) land. • Rooftops of industrial, commercial, and residential buildings. • Lower-grade land (Grades 4–5), unsuitable for food crops. By contrast, this proposal targets prime farmland, needlessly exacerbating an already critical food security issue.	Please refer to the response to comment 'ScPC-002' above. The proposed development only results in partial and temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing, contributing to food production. The land will return to full agricultural use after the project lifecycle.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-036	Agriculture and Soils Climate Change	Agricultural Risk and increase in vulnerability due to climate change	3. Climate Change and Agricultural Risk Climate change increases the vulnerability of our best land: Almost 60% of Grade 1 land lies within Flood Zone 3, according to the Environment Agency. This means productive land outside of flood zones—such as the Green Hill site—is even more important to protect. Flood-prone areas cannot reliably sustain future food output, so safeguarding viable land elsewhere must be a national priority.	The Applicant acknowledges the impact of the climate change on soils, agricultural land and agricultural production. The Applicant queries whether the source of the statement '<i>Almost 60% of Grade 1 land lies within Flood Zone 3</i>.' is correct. If the farmland is within Flood Zone 3, it should not be classified as Grade 1 according to ALC guidelines. Please refer to the response to comment 'ScPC-002' above.
SGHS-037	Agriculture and Soils	Food Security and cost of living	4. Food Security and Price Inflation • The UK currently produces only 66% of the food it consumes. • Natural England estimates that if current development trends continue, food self sufficiency could fall to just 40%. • Domestic food inflation (4.2%) continues to outpace the Consumer Price Index (3.4%), with vulnerable households hardest hit. This proposal actively undermines the nation's capacity to feed itself affordably and sustainably.	Please refer to the response to comment 'ScPC-002' above on food security. The Applicant queries whether the source of the following statement is correct; '<i>Natural England estimates that if current development trends continue, food self sufficiency could fall to just 40%.</i>'



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-038	Agriculture and Soils Energy Need and Policy	Food Security and cost of living	5. Rising Population and Growing Demand By 2050, the UK population is projected to increase by 10%. This demographic shift will demand more: • Food, • Housing, • Energy, • Infrastructure. Only a balanced, integrated land-use strategy can support all four without sacrificing any. This proposal ignores that balance.	Please refer to the response to comment 'ScPC-002' above. The land within the Scheme will return to agricultural use following the decommissioning phase. The 1200ha land for the proposed Sites can serve as a strategic land reserve underpinning national food security. Furthermore, the Scheme does not substantively prejudice the delivery of strategic housing land in the long-term, nor prejudice against land requirements to deliver transport, social, health, or other energy infrastructure. Indeed, the Statement of Need [APP-556] provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050.
SGHS-039	Community Benefits	Loss of local character and no clear community benefit	6. Environmental and Community Harm Local residents and environmental groups are concerned about: • Loss of local rural character and productive landscape.	Please refer to the responses to 'CRNBPC-008' and 'HoPC-010' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Biodiversity disruption, including loss of habitats and hedgerows. • No clear local benefit, such as cheaper energy or direct investment in the community.	
SGHS-040	General	Concluding statement	7. Conclusion The proposed Green Hill Solar Farm is the wrong solution in the wrong place. It sacrifices our most valuable farmland, worsens national food vulnerability, and bypasses better alternatives. It is unnecessary, avoidable, and unsustainable. We call on the planning authority to: • Reject this application outright. • Enforce a policy of protecting high-grade agricultural land. • Promote solar development on brownfield sites, rooftops, and degraded land where food production is not at risk.	The Applicant notes this comment.
SGHS-041	Agriculture and Soils	Objection to the Use of Best and Most Versatile Agricultural Land in Grendon and Easton Maudit	Appendix 3 Stop Green Hill Solar (SGHS) Relevant Representation – PINS Ref EN010170 Relevant Representation to the Examining Authority – Green Hill Solar NSIP (EN010170)	Please refer to the response to comment 'ScPC-002' and 'SGHS-042' above. The Scheme results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing, contributing to food production.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Subject: Objection to the Use of Best and Most Versatile Agricultural Land in Grendon and Easton Maudit The area surrounding Grendon and Easton Maudit is characterised by productive, fertile agricultural land, much of which is Grade 2 and 3a — officially recognised as BMV under the Agricultural Land Classification system. This land has supported cereal, root crop and vegetable production for generations, and continues to contribute to local food supply, rural jobs, and the broader agricultural economy. According to the applicant's own Environmental Statement (ES Chapter 20), approximately 854.5 hectares of the land proposed for solar development — equating to 65% of the total application area — falls within Grades 1, 2 or 3a. This includes substantial areas around Grendon and Easton Maudit.	The land will return to full agricultural use after the project lifecycle.
SGHS-042	Energy Need and Policy	Planning Policy conflict	This is in Conflict with Planning Policy Both National Policy Statement EN-3 and the National Planning Policy Framework (NPPF) are clear: "Where significant development of agricultural land is demonstrated to	Please refer to the response to comment 'SBMP-002/003', 'ScPC-002' and 'SGHS-042' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			be necessary, areas of poorer quality land should be preferred to those of a higher quality.” (NPPF, para 174) “Applicants should use poorer quality land in preference to land of a higher agricultural quality and the use of BMV land should be shown to be necessary and justified.” (EN-3, para 2.48.3) IGP has not adequately demonstrated a robust site selection process that avoids high-quality agricultural land. Nor have they shown compelling evidence that no reasonable alternatives exist — either on lower-grade farmland, brownfield land, or through rooftop and distributed solar options closer to demand centres. The proposed loss of over 850 ha of BMV land, including productive fields within Grendon and Easton Maudit, represents a strategic and long-term loss of vital agricultural capacity and is inconsistent with national and local planning policy.	
SGHS-043	Agriculture and Soils	Objection to the Use of Best and Most Versatile Agricultural Land	Agricultural Productivity and Food Security This area's farmland plays a valuable role in the UK's domestic	Please refer to the response to comment 'ScPC-002' and 'SGHS-042' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			food production, particularly in the current context of global supply chain disruption, inflation, and climate change. Losing hundreds of hectares of high-grade land — even temporarily (60 years!)— risks undermining future food security. IGP argues that the development is reversible, but this is misleading. A 60 year development is, for all practical purposes, a multi-generational removal of farmland from productive use. Soil compaction, surface drainage disruption, long term habitat alteration and lack of guaranteed funding for restoration all raise significant doubts about whether the land will be viably returned to agriculture at the end of the project lifespan.	
SGHS-044	Agriculture and Soils	Objection to the Use of Best and Most Versatile Agricultural Land	Precedent and Comparison The proposed BMV land take of (65%) is considerably higher than other NSIPs that have either been refused or were only accepted after significant mitigation. For example: • Sunnica Solar Farm in Cambridgeshire proposed ~40% BMV and faced strong objections based on this.	Please refer to the response to comment 'ScPC-002' and 'SGHS-042' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Longfield Solar in Essex had ~34% BMV land, and the Examining Authority still raised concerns. To allow 65% BMV loss in this case would set a dangerous precedent — especially in a part of Northamptonshire that still retains a viable rural farming economy and food production base.	
SGHS-045	Socio-Economics, Tourism and Recreation Cultural Heritage	Local Economic and Heritage Impact	Local Economic and Heritage Impact The land proposed for solar development supports local family farms, and tenant farmers, in our area. It also shapes the historic landscape of Grendon and Easton Maudit, which are rural settlements with long agricultural heritage, dating back to ownership by the niece of William the Conqueror and mentioned in the Domesday Book of 1086. Removing agricultural use from such a vast area could have economic cultural and landscape character impacts that extend beyond the application boundary.	The assessment of impacts to farming landholdings, including tenancies on Green Hill F, is set out in ES Chapter 20: Agricultural Circumstances [APP-057]. Of assessed landholdings impacted, no more than 27% of any individual landholding is to be included in the Scheme. Based on the likely proportion of land removed from arable use and knock on effects on suppliers or producers, the assessment in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] estimates that this will cause a long-term loss of 12 agricultural jobs or £493,000 GVA per annum. This is equivalent to a 0.2% loss to the agricultural economy in the Study Area (Bedford, North Northamptonshire, West Northamptonshire and Milton Keynes City). ES Chapter 12 Cultural Heritage [APP-049], supported by ES Appendix 12.7 Historic Landscape Assessment [APP-



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				147], has assessed the potential impact of the scheme on the historic landscape character. No significant effects were identified on the historic landscape character as a result of impacts caused by the Scheme. Removal of the fields within the Scheme from the agricultural cycle will also help to preserve remains associated with the medieval agricultural character of Grendon and Easton Maudit. With respect to rural culture and character of settlements, please refer to the response to 'HoPC-013' above.
SGHS-046	Agriculture and Soils	Objection to the Use of Best and Most Versatile Agricultural Land	Conclusion The Green Hill Solar proposal as submitted would result in the irreversible loss of nationally valuable agricultural land within the parishes of Grendon and Easton Maudit — a decision that would harm local food systems, farming livelihoods and landscape identity. Given the clear policy presumption against building solar projects on BMV land without strong justification — which IGP has not provided — I respectfully urge the Examining Authority to:	The Applicant has undertaken a 5-Stage Site Selection Process, widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] in compliance with National Policy Statement for Energy (EN-1) and National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection on commercial feasibility and the efficiency of the transmission of electricity to the grid, to avoid the use of BMV land as much as possible. The search outcome indicates that the majority of the land within the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Give substantial weight to the strategic value of this farmland. • Recognise the lack of compliance with national and local planning policy. • Recommend refusal of the DCO application on agricultural land use grounds.	20km search area has a high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results. The Applicant has prepared an OSMP [APP-550] and committed soil mitigation measures to protect the soils and the land during construction, operation and decommissioning stages, and return the land to its previous functionality and use. The proposed development only results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing, contributing to food production. The land will be returned to full agricultural use after the project lifecycle. The land under grassland use would be a long-term fallow and will enhance the quality of the soils and land in long term. The land for the proposed Scheme can serve as a strategic land reserve underpinning national food security.
SGHS-047	Transport and Access	Greenhill BESS and Site F Transport Objections	Appendix 4 Stop Green Hill Solar (SGHS) Relevant Representation – PINS Ref EN010170 Greenhill BESS and Site F Transport Objections (Grendon/Easton Maudit) Inconsistent Route Commitment • ES Chapter 13.5.4 (p. 13, ES vol 3) states that traffic for Grendon BESS	With respect to Cogenhoe, HGV traffic is to be routed to and from the A45 via Station Road to the cable route and Green Hill BESS site. The route through Cogenhoe village is not proposed as an HGV route but may be used by some workers and is required to transport a small number of Abnormal Loads. This route has previously been used to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			and Sites F (Easton Maudit) will use the A45 exclusively, avoiding village routes. • But Appendix 13.2, depicts HGVs traveling via Brafield, to Cogenhoe → Whiston Road → Grendon BESS. • The CTMP GH7.9 states Yardley Rd compound CC4 will be accessed by an internal haul route, however, Land Plan A clearly shows the access from Yardley Road ie through Grendon. Appendix 13.2 of the transport assessment confirms through Grendon as a preferred route, despite serious reservations. • At best, this is misleading but it represents a fundamental flaw in the ES statement as it is inconsistent.	transport Abnormal Loads associated with the Grendon Substation. Abnormal loads are subject to processes that ensure prior notice is provided and will require agreement from the local highway authorities and police. Yardley Road may be accessed by worker vehicles with HGV movements using an internal Haul route. The OCTMP Revision A [EX1/GH7.9_A] confirms that HGVs may only use Station Road. These routes are set out in the OCTMP Revision A [EX1/GH7.9_A] which provides a framework for the management of construction vehicle movements to and from the Scheme. The detailed CTMP, to be approved by the relevant planning authority, is secured by Requirement 15, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A].
SGHS-048	Transport and Access	Misleading calculations within the transport assessment	There are also misleading classifications of some of the routes eg link ID 77 Station Road into Grendon ES 13.1 page 5 This is a primary access route into Grendon village, crucial for residents, services, and emergency vehicles. This fails to comply with NPS EN-1 para 5.13.4, which requires routes carrying high village	The sensitivity of this link has been assessed against the criteria (Prepared in line with the guidance provided in The Institute of Sustainability and Environmental Professionals (formerly the Institute of Environmental Management and Assessment) <i>Environmental Assessment of Traffic and Movement 2023</i>) outlined in Table 13.3 of ES Chapter 13 Transport and access [APP-



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			dependence to be assessed and protected. It has a popular PROW leading to Castle Ashby (which will be disrupted by the cable corridor, as will the Road leading to Castle Ashby at point CR18) and the road has several steep uphill sharp blind bends, with connecting traffic from Church Way and Manor Court to name but 2 interchanges. It should most definitely be classed as high risk/sensitivity. link	050] and is considered to be appropriate in this context. With respect to footpath NN TF/4 and WN KE 1, which runs between Castle Ashby and Grendon, construction is anticipated to generate a medium-term temporary moderate-minor adverse effect (not significant) as a result of HGV crossing to access CC4 and the cable route between Green Hill BESS and Green Hill F. This has been assessed in ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [EX1/GH6.3.17.1_A]. This is to be controlled through the mitigation measures set out in the OCTMP Revision A [EX1/GH7.9_A] and OPROWPPMP Revision A [EX1/GH7.10_A], which are secured by Requirements 15 and 18 respectively in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
SGHS-049	Transport and Access	Inappropriate Use of Narrow Village Roads	Inappropriate Use of Narrow Village Roads – e.g. CC4 Compound Yardley Road Yardley Road is a narrow, rural lane with no pavements and barely allowing 2 cars to pass in places. The use of this road for repeated access to Compound 4 is inappropriate and	ES Figure 13.5 Routes to Scheme Sites South Area [EX1/GH6.4.13.5_A] identifies that cars and light vehicles may use the route to Yardley Road. HGVs must use alternative routes and travel to this area through internal haul roads. Movements across Yardley Road between fields will be low in number and managed through traffic management schemes as



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Poses a risk to pedestrians, cyclists, children, equestrians and vulnerable road users, • Would pass Grendon Primary School, increasing collision risk during school hours, • Passes the football ground increasing the potential for collision during matches/training of children. • Passes the village allotments increasing the potential for collision with pedestrians. • Has not been shown to meet visibility splays, turning radii, or structural load capacity suitable for large construction traffic. This violates Department for Transport (DfT) guidance on safe rural road use and Manual for Streets principles and runs contrary to DfT guidance and North Northamptonshire highways standards, which require detailed assessments where impact on local rural roads is anticipated.	the flexibility defined in the works plans allow. An assessment of road traffic effects during the construction phase upon users of then highway network has been undertaken as part of the ES Chapter 13 Transport and Access [APP-050]. The OCTMP Revision A [EX1/GH7.9_A] provides a framework for the management of construction vehicle movements to and from the Scheme. It will ensure that the effects of the construction phase are minimised. The OCTMP sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. The detailed CTMP, to be approved by the relevant planning authority, is secured in Schedule 2, Requirement 15 of the Draft DCO Revision A [EX1/GH3.1_A].
SGHS-050	Transport and Access Energy Need and Policy	Disruption and Severance of Local Connectivity/Conflict with National Policy	Disruption and Severance of Local Connectivity/Conflict with National Policy	ES Figure 13.5 Routes to Scheme Sites South Area [EX1/GH6.4.13.5_A] identifies that cars and light vehicles may use the route to Yardley Road. HGVs



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The Yardley Road compound sits close to the main through-routes connecting Grendon with: • Easton Maudit (via Easton Way), • Yardley Hastings and Castle Ashby • The A428 to Northampton/Bedford/Olney/Denton • The local medical centre • Local Primary schools. The proposed use of Grendon village roads for compound access conflicts with: • NPS EN-1 para 5.13.4 – which requires applicants to demonstrate that appropriate traffic management and routing will avoid adverse impacts on the local community. • NPPF para 111 – which states that development should only be prevented on highways grounds if it would result in an unacceptable impact on highway safety or the residual cumulative impacts would be severe. • DfT Circular 02/2013 – which cautions against using roads that are	must use alternative routes and travel to this area though internal haul roads. Movements across Yardley Road between fields will be low in number and managed through traffic management schemes as the flexibility defined in the works plans allow. The Applicant acknowledges the requirement to “<i>prepare a travel plan including demand management and monitoring measures to mitigate transport impacts</i>” in paragraph 5.14.7 of NPS EN-1. The OCTMP Revision A [EX1/GH7.9_A] provides for a Construction Worker Travel Plan to be drafted and implemented, which aims to reduce single occupancy car travel, increase car sharing and shuttle bus use, and increase knowledge of public transport and active travel opportunities. The assessment of transport and access effects are considered in ES Chapter 13 Transport and Access [APP-050], which confirms that, with the mitigation proposed, there will be no significant adverse effects on transport receptors. The Scheme will not have an unacceptable impact on highway safety.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			unsuited to the scale and frequency of proposed vehicle movements.	
SGHS-051	Transport and Access	Cumulative Assessment	No Assessment of Cumulative Transport Exposure • The Transport and Access documents do not consider cumulative impacts of multiple site developments and cable corridors, concurrently operating on the same rural road network at the same time. • Nor does it consider the cumulative impacts of the recently granted Statera 49.99 MW BESS site in Grendon, or the existing Statera BESS installation. • For Greenhill Grendon BESS and site F alone, this amounts to 283 daily movements including HGV and LGV for up to 24 months. • Highways policy requires cumulative volume and structural modelling, particularly when multiple infrastructure proposals use the same routes; this is missing in the DCO. • CTMP contains no phasing plan to prevent simultaneous closures of key access roads, such as: - o Yardley Road,	The ES Appendix 13.2 Transport Assessment [APP/GH6.3.13.2] considers the construction durations of each Site and the overlap as an indicative construction programme, reflecting a typical build out scenario. The forecast trips and peak movements for each Site were identified during the construction period. The peak construction traffic flows have been assessed in order to provide a robust realistic worst-case scenario as in practice the peak periods for each Site are very unlikely to overlap. The construction traffic management plan, secured by Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A], ensures that the actual construction traffic does not exceed what has been assessed. The Statera BESS (Application Reference: NW/23/00360) is included in the Transport Analysis in Table 13A3.3 of the ES Appendix 13.3: Cumulative Schemes [APP/GH6.3.13.3]. The Transport Assessment [APP/GH6.3.13.2] considers the cumulative schemes that are proposed in the local area. Table 8.3 presents the traffic movements that have been forecast to be associated with the identified



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			- o Station Road, - o Grendon Road leading to the A45 - o Main Road Grendon to Hardwater Road. - o Easton Way • Potential scenario: closure of these routes could cut off all access to/from Grendon, including emergency services. • National Policy EN-1 (para 5.13.4) requires assessment and mitigation of such disruptions—this is missing	cumulative schemes and this forms part of the baseline for the Transport Assessment. The Applicant acknowledges that road closures have the potential to impact traffic, however, any traffic restrictions required for the Scheme must be notified to the highway authority and article 9 of the draft DCO applies the street works permit schemes to the Scheme which further manages when road works may be carried out,
SGHS-052	Transport and Access	Construction Period	Extended Duration Multiplies Harm • Local stakeholders expect construction to extend for over 24 months with regular HGV movements Already under pressure from 2023-built Statera 49.99 MW BESS and planned follow-on projects, additional Green Hill activity risks prolonged disruption. Despite this cumulative context, CTMP and ES: • Do not provide duration-based traffic modelling aligned with Grendon's road capacities, • Do not propose staging or phasing to reduce continuous pressure.	Please refer to response to SGHS-055 Traffic modelling is not considered necessary where construction traffic will be managed such that it occurs outside of the network peak periods experienced on the highway network and has not been requested by the highway authorities. The OCTMP Revision A [EX1/GH7.9_A] sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme and mitigate the potential transport effects.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-053	Transport and Access	Community Impact Risks Without Control Measures	Community Impact Risks Without Control Measures • Heavy vehicles using key village roads are likely to generate noise, dust, vibration, and safety risks near sensitive locations such as Grendon Primary School, along narrow lanes without footpaths, and near residential frontages. • The CTMP proposes only generic mitigations (e.g. signage). • There is no mitigation for peak school times, limited footpath protection, or temporary infrastructure (passing places, traffic lights) referenced, despite proximity to Grendon Primary School. This contradicts highway safety guidance and does not minimise disruption to residents or vulnerable groups (e.g. school children, elderly, equestrians, cyclists).	The OCTMP Revision A [EX1/GH7.9_A] identifies HGV routes and confirms the route through Grendon should not be used. Some worker traffic may use this route but this will be discouraged through a Construction Worker Travel Plan. Whilst the route does not pass through Grendon, peak hour restrictions are proposed and specific restrictions around school times can also be implemented as part of a future CTMP.
SGHS-054	Transport and Access Cultural Heritage	Impact on Residential Amenity and Heritage	Impact on Residential Amenity and Heritage Grendon is a conservation village with multiple listed buildings. The introduction of frequent HGV traffic: • Risks vibration damage to heritage properties,	ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has identified a Neutral effect would occur as a result of the Scheme to Grendon Conservation Area (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]).



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Erodes the character of a tranquil, historic settlement, and • Harms the setting of listed buildings contrary to Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. • The proposal lacks a proper heritage impact assessment for HGV routing and construction-related visual/sensory intrusion The proposed routing of HGVs and construction traffic through Grendon village, including Yardley Road, Main Road, and Station Road, raises serious concerns regarding public safety, highway suitability, local amenity, and policy compliance. • Pedestrian and heritage risk due to constrained carriageways and lack of footpaths. • Unsuitability of the rural street layout to vehicle numbers expected for compound access. • No evidence of proposed structural upgrades to roads or pavements. • Lack of proposed alternative routes, which are essential before consent can be granted	The approach towards route choice and avoiding the most sensitive routes has been undertaken with consultation of the highway authorities. An assessment of construction traffic and consideration of effects is provided in ES Chapter 13 Transport and Access [APP-050]. Construction traffic routes have been identified in OCTMP Revision A [EX1/GH7.9_A], to avoid large increases in HGV movements near to heritage assets and to minimise the potential for swipes and strikes to assets located directly adjacent to roads. The OCTMP Revision A [EX1/GH7.9_A] confirms that HGVs will not be permitted through Grendon. Construction worker traffic may pass through this location but will be discouraged from doing so through a Construction Worker Travel Plan.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-055	General	Concluding statement	Executive Summary The CTMP's generalised mitigation strategy is fundamentally insufficient for the unique and interconnected rural road network around Grendon and Easton Maudit. The residents of Grendon and Easton Maudit rely on safe, functioning rural roads. The current DCO transport strategy is contradictory, incomplete ill-conceived and inconsiderate. I urge the Examining Authority to: 1. Require full disclosure of projected daily, peak-hour, cumulative HGV volumes per route affecting Grendon/Easton Maudit. 2. Mandate route-specific traffic modelling, including oversize load staging, predicted dwell times, and cumulative phase assessments. 3. Enforce village-level transport safeguards, including traffic-hour restrictions, speed controls, and monitoring near schools and residential frontages. 4. Assess cumulative impact of Green Hill activity combined with existing and consented energy	The Applicant notes this comment



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			developments, notably the Statera BESS. 5. Require binding CTMP updates with real data and enforceable mitigation measures before approval. 6. Refuse permission for the use of Yardley Road and Grendon village roads as access routes to any HGV or construction compound traffic. 7. Challenge the siting of CC4 compound on Yardley Road Grendon and move to Site F. 8. Direct IGP to identify access to the South to be via A509 and not through Grendon. 9. Mandate a construction Traffic Routing Plan which excludes residential village cores and sets enforceable limits on traffic volumes and operating hours.	
SGHS-056	Other Environmental Matters	BESS sites Cumulative Effects	Appendix 5 Stop Green Hill Solar (SGHS) Relevant Representation – PINS Ref EN010170 Greenhill Solar - BESS CUMULATIVE IMPACT Grendon is a small rural community of circa 500 souls, previously owned by Judith of Lens, the niece of William the conqueror and mentioned in the the Doomsday	In line with established DCO requirements the Applicant has submitted an OBSSMP Revision A [EX1/GH7.7_A]. The Applicant will be required to prepare a Battery Storage Safety Management Plan (BSSMP) which must be in accordance with the OBSSMP Revision A [EX1/GH7.7_A] which is secured by



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			book of 1086. The village is a few hundred metres only from Grendon sub-station which is the proposed site for the installation of up to 500mw of BESS and and incremental sub-station. • Statera Energy already operates a 49.99MW BESS installation and have secured planning permission for a second 49.99mw installation in the vicinity of the Greenhill Solar proposal. • The Greenhill BESS of up to 500mw would add a third large-scale lithium-ion battery site in close geographic proximity, which would dramatically increase the industrial scale of battery installations in a concentrated rural setting, significantly intensifying risk, infrastructure stress, and environmental pressure. • NO CUMULATIVE IMPACT ASSESSMENT HAS BEEN UNDERTAKEN AND INCLUDED IN THE DCO • The Greenhill BESS site lies 110m from the nearest residential dwellings and 500m from the centre of the village.	Requirement 6, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. As part of the BSSMP, the Applicant will take into account the latest good practices for battery system failure prevention and detection, consequence modelling, risk analysis, and emergency response planning, as guidance continues to develop in the UK and around the world. Section 6.1.8 of the OBSSMP defines the key safety information which must be included in the final BSSMP, this is secured through the DCO. Section 6 of the OBSSMP stipulates all the Pre-Construction Requirements that must be met and are secured through Requirement 6, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. The cumulative impacts have been considered in the Environmental Statement in each of the technical chapters. The cumulative impacts are also summarised in ES Chapter 25 Cumulative Effects and Effects Interactions [APP-062] for full cumulative assessment. Please refer to the response to comment SGHS-055 for further information on cumulative impacts.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• There is a requirement for an explicit cumulative assessment under EIA/HRA regulations if additional large-scale BESS is permitted adjacent to an already consented installation. • THERE IS NO PUBLISHED BSMP IN THE DCO (Battery Safety Management Plan) Other planning authorities (e.g. Suffolk for Sunnica) have refused or delayed BESS approvals until such data is provided.	
SGHS-057	Other Environmental Matters	Compound Fire and Public Safety Risks	Compound Fire and Public Safety Risks • Multiple BESS installations within a constrained area increase the risk of: - o Concurrent or cascading thermal events - o Strain on emergency services and fire suppression resources - o Inadequate evacuation planning for Grendon, Easton Maudit, and surrounding hamlets • No regional fire authority strategy appears to address this cumulative hazard	Please refer to the response to comment 'SGHS-060' above. The Applicant is liaising closely with Northamptonshire Fire & Rescue Services (NFRS) to ensure that all requirements are met for site risk assessments, site familiarisation visits, and training for BESS failure emergency response protocols.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• The DCO requires submission of a Battery Safety Management Plan (BSMP) (Requirement 9, Schedule 2) pursuant to the Outline BSMP (APP/GH7.7, May 2025). • That document contained in DCO remains an outline, lacking final design-level specifications, plume modelling outputs, and emergency protocols.	
SGHS-058	Hydrology and Flood Risk	Flood Risk near the River Nene	Flood Risk Compounding • All sites (Statera and Greenhill) lie near the River Nene floodplain, with known Zone 2/3 overlaps. link page 12. • A single fire, flood or spill incident could overwhelm shared surface water systems and affect the Nene Valley SPA/SSSI/Ramsar. • No cumulative Flood Risk Assessment (FRA) or hydrological study has been published combining all three sites.	The Applicant acknowledges that the River Nene and its floodplain are a key hydrological feature of the wider area. The ES Appendix 10.1: FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes confirm that the majority of the Order Limits are located within Flood Zone 1, with only limited overlaps with Flood Zones 2 and 3. All sensitive infrastructure, including the BESS and substations, is located in Flood Zone 1 and outside the modelled design flood extent. The FRA demonstrates that there will be no loss of floodplain storage and no increase in flood risk to third parties. In accordance with the NPPF and NPS EN-1/EN-3, every development must demonstrate that it is safe for its lifetime and does not increase flood risk elsewhere. The ES Appendix 10.1: FRADS Report Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				[EX1/GH6.3.10.1_A] confirms that this requirement is achieved for Green Hill Solar Farm through sustainable drainage systems with attenuation and exceedance routing contained within the Order Limits. On this basis there is no pathway for cumulative off-site flood risk impacts to arise between this Scheme and other nearby projects, because each scheme is assessed, designed and consented to prevent off-site detriment in isolation. Research by Cook & McEwan (2013) further demonstrates that solar panel arrays do not materially increase runoff, as rainfall continues to infiltrate between and beneath the panels and vegetation slows and filters flows compared with arable land. Potential effects on the River Nene and designated ecological sites have also been assessed in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] and the HRA Revision A [EX1/GH7.21_A], which confirm that the Scheme will not give rise to adverse effects on the integrity of the Nene Valley SPA/SSSI/Ramsar.
SGHS-059	Ecology and Biodiversity	Environmental Pollution	Environmental Pollution Burden • Ecological pressure: The cumulative hydrological and landscape footprint from multiple	The HRA Revision A [EX1/GH7.21_A] assesses the risks of adverse effects on integrity of the SPA, both in isolation and in combination. No adverse effects on



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			sites increases habitat fragmentation, surface run-off routing, and disturbance to protected species. There is a requirement for hydrological and environmental modelling to assess: • Run-off pathways toward the Nene Valley SSSI/SPA/Ramsar sites. • Pollution containment from firefighting or battery breach events. • Cumulative impacts from fire, smoke and chemical leachate on protected species and water bodies • It could significantly impact the ecological character of the Nene Valley protected wetlands, contrary to the Conservation of Habitats and Species Regulations 2017.	integrity are predicted from habitat fragmentation, pollution or disturbance. Please see response to SGHS-014 in regard to pollution and battery fire safety.
SGHS-060	Energy Need and Policy	Planning Policy Non-Compliance	Planning Policy Non-Compliance • NPS EN-1 (para 4.2.6) and EN-5 require cumulative impacts to be identified, assessed and mitigated. • NPS EN-1 / EN-3 – requires public safety “acceptable and appropriately mitigated”- this has not been demonstrated.	Please refer to the response to comment ‘SGHS-011’ above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Local plans (North Northamptonshire Joint Core Strategy) stress the need to avoid infrastructure clustering that results in environmental harm or cumulative pressure on rural areas. • Buckinghamshire Council recently refused Staterra's Granborough/Buckinghamshire 500 MW BESS development, citing concerns over fire risk, rural landscape harm, and cumulative impact with adjacent solar farms. • The council noted that once a permit area becomes saturated with such installations, the community and environment cannot absorb further infrastructure without significant cumulative harm	
SGHS-061	General	Concluding Statement	I respectfully request the Examining Authority to: 1. Require explicit cumulative assessment under EIA/HRA regulations if additional large scale BESS is permitted adjacent to an existing and additional already consented installation. 2. Assess the cumulative impact of the proposed BESS at Green Hill in	The Applicant notes this comment



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			conjunction with existing and permitted Statera installations. 3. There is no published BSMP: The Examining Authority should Require publication and review of the BSMP before any consent is granted. Unlike Cleve Hill NSIP, the draft BESS safety plan is not included in the DCO documents, nor are key deliverables or performance standards formally defined. • Mandate hydrological and environmental impact modelling, detailing pollutant pathways to the Nene SPA/SSSI/Ramsar. Despite proximity to the River Nene and designated ecological zones (e.g. SPA/Ramsar), the DCO offers no formal guarantees to prevent contaminated run-off, chemical release, or off-site water pollution in the case of fire or leakage. There is no pollution prevention strategy • Weight heavily the precedent of refusal in other rural settings where saturated energy infrastructure led to refusal. • Refuse or require significant redesign of the Green Hill BESS unless cumulative impact and	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			saturation concerns across the cluster of installations are properly mitigated.	
SGHS-062	Other Environmental Matters	Landscape character and ecological integrity concerns	Conclusion Permitting Green Hill Solar's BESS (up to 500mw) alongside existing and granted Statera BESS facilities (combined 99.8mw) would create a densely industrialised cluster of battery storage infrastructure in an otherwise rural, sensitive ecological setting. This raises material concerns regarding landscape character, emergency service readiness, ecological integrity, and cumulative safety risk—especially given precedents of refusal elsewhere. I urge the Examining Authority to treat cumulative impact as a key factor in its deliberation.	The Applicant notes this comment
SGHS-063	Landscape and Visual Impacts	Harmful impact on the valued undulating landscape character	Appendix 6: Stop Green Hill Solar (SGHS) Relevant Representation – PINS Ref EN010170 LVIA Summary – Grendon and Easton Maudit This representation raises a formal objection to the proposed Site F solar array installation within the Green Hill Solar DCO. Specifically, it addresses:	The Applicant notes this comment and addresses each point in turn in the subsequent responses.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• The inappropriate siting of solar infrastructure immediately adjacent to the Conservation Village of Easton Maudit; • The disruption and visual harm caused to existing Public Rights of Way (PRoWs); • Harmful impact on the valued undulating landscape character and intervisibility between Easton Maudit and Grendon.	
SGHS-064	Cultural Heritage Landscape and Visual Impacts	Visual & Heritage Setting Impact	Site F Proximity to Easton Maudit — Visual & Heritage Setting Impact • Site F lies immediately west of Easton Maudit, within 30m of the village and its Conservation Area, and is highly visible from both Easton Way and the surrounding lanes. (Fig1) • The village contains multiple Grade II and Grade I listed buildings*, including the Church St Peter & St Paul Grade I* whose elevated position gives long-ranging views over Site F towards St Marys Church Grendon, St Romwalds Church Strixton and St Mary the Virgins Church Bozeat (Fig 2)	ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has identified a Moderate adverse effect would occur as a results of the Scheme on Easton Maudit Conservation Area and the Church of St Peter and St Paul (NHLE:1189610) (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). Mitigation in the form of: • Removal of solar panels from Fields FF9, FF13, FF14, FF16 and FF22; • Offsets in Fields FF11, FF15, FF19 and FF26; • Visual corridor retained between Churches / Visual corridors retained along PROW with historical



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• The LVIA understates the level of visual harm in this location by: - o Omitting key viewpoints from the public footpaths and roads west of the village; - o Omitting to include in the DCO suggested viewpoints made by NNC, namely, NN8/9/10/11 - o Failing to include sufficient winter photomontages where screening is minimal; o Critically underplaying viewer sensitivity from heritage settings and homes. - o GLVIA3 guidance requires views from heritage assets and Conservation Areas to be treated with High sensitivity — this has not been reflected in the applicant's assessments for Site F.	associations / views between heritage assets; • Enhanced screening of existing hedgerow and tree belts has been proposed to protect the Church of St Peter and Paul. ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] includes a suite of viewpoints that cover a wide range of visual receptors, including public locations such as transport routes, PRoW and residential properties. Viewpoints have been selected to represent the experience of different types of visual receptor, including users of PRoW, residential properties, transport routes, heritage, and recreational sites. Selected viewpoints include specific locations that are popular vantage points or tourist destinations, and those suggested through Section 42 and Section 47 consultation. Viewpoints have also been selected to illustrate landscape character effects or likely Cumulative Effects of the Scheme. A series of 'representative and specific viewpoints' are shown on Figures 8.10 [APP-308] to 8.10.5 [APP-313]. Verified photography and photomontages are shown on Figure 8.14.1 [APP-334]. to Figure 8.14.13 [APP-346]. There are a total of 64 viewpoints covering the Study Areas for



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				the Sites and the Cable Route Corridor. These viewpoints comprise initial viewpoints selected for the purpose of the assessment and likely to be affected by the Scheme and then additional viewpoints provided as part of the Section 42 Consultation. The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation, where a total of 13 additional viewpoints have been included and photography undertaken, these are identified as Viewpoint Number NN1 – NN13. The viewpoint locations are shown on Figures 8.10.1 [EN010170/APP/GH6.4.8.10.1] to Figure 8.10.5 [EN010170/APP/GH6.4.8.10.5] and the Verified Photography and Photomontages are shown on Figures 8.14.1 - 8.14.NN13. A series of photomontages have been produced to show the effects of the Scheme at locations where significant effects were considered likely to occur. Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives for North Northamptonshire and Milton Keynes City Council.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				A total of 26 AVR level 3 montages have been produced using summer and winter photography as illustrated in Figure series 8.14 [EN010170/APP/GH6.4.8.14.1 to EN010170/APP/GH6.4.8.14.NN13], and as set out within Table 8.6 of the LVIA. GLVIA3 does not prescribe sensitivity of individual visual receptors. The judgement on visual sensitivity is based on consideration of both the visual receptor's value and its susceptibility to change arising from the Scheme. Details on how a visual receptor's value and susceptibility is assessed is contained within Appendix 8.1 of the LVIA [EN010170/APP/GH6.3.8.1]. However, it is considered that a combination of high susceptibility to change and high value is likely to result in the highest sensitivity, whereas a low susceptibility and low value is likely to result in the lowest level. The value, susceptibility to change and resultant sensitivity of a visual receptor are categorised based on Tables 8.1.1.9 to 8.1.1.12 of Appendix 8.1 of the LVIA Methodology[EN010170/APP/GH6.3.8.1]. It should be noted that the levels are indicative and in practice there is not a clear distinction between criteria levels.
SGHS-065	Socio-Economics,	PRoW Disruption	PRoW Disruption — Severance and Visual Degradation	The assessment undertaken in ES Chapter 17: Socio-Economics, Tourism



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Tourism and Recreation Landscape and Visual Impacts		• Several PROWs/Bridleways (e.g., TP 174/181/184/185/186/TP201) traverse or run directly adjacent to Site F. These routes are key for community access to the countryside and serve recreational walkers, riders, and visitors, including the annual Internationally Acclaimed Waendel Walk attracting up to 3000 visitors per year and the route regularly encompasses many of these paths and brings visitors to both villages. • The solar arrays and fencing will truncate or divert these paths, forcing walkers to navigate through or alongside industrialised corridors of security fencing and panels. • The LVIA erroneously underrepresents the loss of visual amenity for path users by classifying the receptors as "low-medium sensitivity," contrary to planning guidance and local context. This fails to comply with: • North Northamptonshire Joint Core Strategy (Policy 3 & 8) – which protects local green infrastructure and access to countryside;	and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] assess the likely effects of the Scheme on all PROWs likely to be affected by the Scheme, and all long-distance recreational routes (such as the Waendel Walk) likely to be affected by the Scheme. The assessment identifies significant adverse effects to long-distance recreational routes (including the Waendel Walk) during construction due to their high sensitivity. The Applicant has committed to mitigation measures to limit the impacts to users of this route, and will continue to work with Wellingborough Town Council to ensure that suitable diversions if required are put in place for the Waendel International Walk annual event. During construction, the routing of PROWs within the Order Limits are to be protected and kept open wherever feasible and safe to do so. Any closures or diversions, such as for cable laying and landscape planting will be temporary in nature, with sufficient prior notice given of closures, and diversion routes clearly signposted. These measures are set out in the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• NPPF paragraph 100 – which requires planning decisions to protect and enhance PROWs and their settings.	The Scheme does not truncate or cause long-term diversions to PROWs, while substantial offsets (minimum 15 m from PROW centrelines) and some areas of open fields are provided to ensure PROW users are separated from onsite infrastructure to mitigate against users feeling enclosed where crossing the Sites. These design measures are set out in the OLEMP Revision A [EX1/GH7.4_A] which is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The judgement on visual sensitivity is based on consideration of both the visual receptor's value and its susceptibility to change arising from the Scheme. Visual Receptor Susceptibility to change is set out within Table 8.1.1.10 of Appendix 8.1 of the LVIA [EN010170/APP/GH6.3.8.1]. In accordance with the detailed methodology contained within Appendix 8.1, PROW within Site F are assessed as being of Medium Visual Susceptibility due to the recognition that they are <i>'Views experienced from boats, public rights of way / footpaths used locally and passing through the landscape and well used footpaths within settlements'</i> and therefore not of High Visual Susceptibility as they are not <i>'Views from well used public rights of way including strategic footpaths / long distance trails and cycle routes (where the</i>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<i>attractive nature of the countryside is a significant factor in the enjoyment of the walk). Visitors along scenic routes and to recognised viewpoints. Visitors to protected landscapes or heritage assets where views of the surroundings are an important contributor to the experience.'</i> Buffers outlined in Table 8.8 of ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] have been embedded into the design of the Scheme. This includes the provision of 15m buffers from PRow to create a 30m wide corridor between fence lines maintaining their setting and openness. The Landscape and Ecology Mitigation Plans [APP-207 to APP-219] have been iteratively designed to maintain existing PRow and provide new permissive paths enhancing access throughout the receiving landscape.
SGHS-066	Landscape and Visual Impacts	Loss of Rural Character	Intervisibility Between Villages – Loss of Rural Character • The topography between Easton Maudit and Grendon forms a gentle valley of undulating arable land, currently offering expansive open views across the landscape, forming a key part of local identity.	The Applicant notes this comment. The ES Chapter 8 Landscape and Visual Impact Assessment [APP-045] recognises the shift from open agricultural farmland to large scale solar infrastructure stating that the character of the Sites themselves and their immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme leading to Significant adverse effects on local landscape



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Site F, together with cable corridors and perimeter fencing, will result in: - o Severance of visual continuity between the two villages; - o Perceived coalescence of industrialised land into what is now tranquil and historic countryside; - o A breakdown of the area's spatial coherence. NNC's own Landscape Character Assessment (2006) classifies the area as "Undulating Hills and Valleys – Rural character with high visual sensitivity." Solar development of the scale and density proposed at Site F is incompatible with this classification	character. However, this needs to be considered against the ability of the receiving landscape to accommodate the low lying infrastructure. Within the study area there would be limited appreciation of the array or associated infrastructure, with the integrity of the character of the wider receiving landscape preserved, along with landscape features within retained and enhanced. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme. The Scheme comprises a series of independent areas of land or Sites set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRow and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The discrete areas of land in the Scheme are placed so far apart that the Scheme will not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern. This 'network of sites' approach demonstrates good design by allowing for a fine-tuning approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing, and provide enhanced landscaping and vegetation. This demonstrates how the Scheme is sensitive and responsive to place. Buffers outlined in Table 8.8 of ES Chapter 8 Landscape and Visual



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Impact Assessment [APP-045] have been embedded into the design of the Scheme. This includes the provision of 15m buffers from PRow to create a 30m wide corridor between fence lines maintaining their setting and openness. The Landscape and Ecology Mitigation Plans [APP-207 to APP-219] have been iteratively designed to maintain existing PRow and provide new permissive paths enhancing access throughout the receiving landscape. The layout of the Scheme for Site F has included a number of design responses included to maintain intervisibility of churches within the landscape, notably the Church of St Peter and St Paul at Easton Maudit, the Church of St Mary at Grandon and the Church of St Mary at Bozeat. This avoidance of infrastructure can be seen in fields FF8, and FF11. Panels are also not proposed within fields FF13, FF14 and FF16 to maintain the open setting of Easton Maudit. Avoidance in these fields inhibits panels being immediately alongside both sides of Easton Way, maintaining open approach into and out of the settlement of Easton Maudit.
SGHS-067	Landscape and Visual Impacts	Inadequate Mitigation & Screening at Site F	Inadequate Mitigation & Screening at Site F • The ES states that embedded mitigation includes new hedgerow	Embedded Mitigation is taken into account during the construction, operation (Year 1 and Year 15) and decommissioning phases of the Scheme. Measures are



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			planting along field boundaries. However: - o These take decades to mature; - o They offer little protection in winter months; - o The setbacks between the village and solar infrastructure are insufficient to protect views or village character. • Without bunding, mature planting, or wider exclusion buffers, the LVIA's claim of 'minor/negligible adverse' impact is wholly unsubstantiated.	embedded within the design of the Scheme at the outset and depend on the preliminary findings of the LVIA process. The measures are iterative and essentially look to modify the scale and layout of the Scheme and also strive to achieve to raise the bar of acceptability in terms of planning policy compliance. These measures aim to ensure a reasonable balance of viability and to meet with policy expectations. The LVIA recognises that embedded mitigation planting would take time to reach maturity. As such, the LVIA allows a uniform rate of growth for trees, shelterbelts, and woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached a minimum height of 7.5m. A uniform growth rate is allowed for new hedgerows of 0.4m every 1 year. This would result in hedgerows being able to be maintained at a height of 4.5m by Year 15. These 'embedded mitigation' measures are secured via the DCO (for example, by specifying that each Work number can only be located on the area shown on the Works Plan Revision A [EX1/GH2.4_A]) or as part of ES Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Details of the Embedded Landscape Design Parameters that has been adopted for the design of the Scheme are set out in Table 8.7 of ES Chapter 8 Landscape and Visual Impact Assessment [APP-045] The iterative design of the Scheme also uses a series of buffers, that are embedded into the design. These buffers are outlined in Table 8.8 of ES Chapter 8 Landscape and Visual Impact Assessment [APP-045] have been embedded into the design of the Scheme and are embedded into the Landscape and Ecology Mitigation Plans [APP-207 to APP-219]
SGHS-068	Landscape and Visual Impacts	Requests for Information	Request to Examining Authority Given the above, I respectfully request the Examining Authority to: 1. Require re-assessment of Site F's landscape and visual impact with: - o Viewpoints from Easton Way, Sharplands in Grendon, PRowS TP174/181/184/185/186/201, and from viewpoints NN 7/8/9/10/11 as previously requested by North Northants District Council and which have not been satisfied. - o Full winter photomontages;	The ES Chapter 8 Landscape and Visual Impact Assessment [APP-045] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within ES Appendix 8.1 [APP-078 and APP-079]. There are a total of 64 viewpoints covering the Study Areas for the Sites and the Cable Route Corridor. These viewpoints comprise initial viewpoints selected for the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			o Cumulative impact analysis incorporating substation, cabling, and BESS locations, including both Statera BESS installations. 2. Demand enhanced setbacks and permanent visual screening from Easton Maudit (increased buffer with bunding and mature planting). 3. Reconsider the siting of Site F entirely, as its location breaches both national and local planning policy protections for: o Conservation Areas and their setting, o Access to and enjoyment of PRowS, o Sensitive rural landscape character. 4. Seriously consider the loss of tourism impacts that will be felt by the inability to host the Waendel Walk between these villages, an annual event attracting up to 3000 International visitors.	purpose of the assessment and likely to be affected by the Scheme and then additional viewpoints provided as part of the Section 42 Consultation. The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation, where a total of 13 additional viewpoints have been included and photography undertaken, these are identified as Viewpoint Number NN1 – NN13. The viewpoint locations are shown on Figures 8.10.1 [APP-309] to Figure 8.10.5 [APP-313] and the Verified Photography and Photomontages are shown on Figures 8.14.1 [APP-334] - 8.14.NN13 [APP-400]. A series of photomontages have been produced to show the effects of the Scheme at locations where significant effects were considered likely to occur. Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives for North Northamptonshire and Milton Keynes City Council. A total of 26 AVR level 3 montages have been produced using summer and winter photography as illustrated in Figures 8.14.1 [APP-334] - 8.14.NN13 [APP-400].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				and as set out within Table 8.6 of the LVIA. The LVIA includes a thorough and robust Cumulative Assessment. In reaching the overall assessment of effects associated with the Scheme the cumulative effects of each of the Sites and Cable Route Corridor are assessed and combined to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme. The cumulative effects of each of the Sites and Cable Route Corridor are assessed and the combined set of effects of the Scheme and reached an overall conclusion on where likely significant effects might occur as a result of the Scheme. ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] contains an Assessment of Cumulative Site Effects on the different Landscape Study Areas and Landscape Fabric with a detailed examination of effects set out within section 8.9 of ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]. Cumulative Site Visual Effects are addressed within section 8.9 of ES Chapter 8 Landscape and Visual Impact Assessment [APP-045] with ES



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] containing details on the individual Visual Assessments. This includes an assessment of both Combined views and Sequential views. Viewpoints have also been selected to illustrate landscape character effects or likely Cumulative Effects of the Scheme. A cumulative assessment of the Scheme and other Cumulative Developments is included within the LVIA, assessing both the cumulative landscape and visual effects of the Scheme in conjunction with other local developments. The Cumulative Developments assessment considers the additional effects resulting from the Scheme in combination with the effects resulting from other similar developments, these being other renewable projects taken together, further details can be found in ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A]. The iterative design of the Scheme has utilised a series of buffers that have been embedded into the design which are outlined in Table 8.8 of the ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]. These buffers have been embedded into the design of the Scheme and are embedded into the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Landscape and Ecology Mitigation Plans [APP-207 to APP-219]. The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. Details of the process are set out in Appendix 5.1: Site Selection Assessment of the Environmental Statement Revision A [EX1/GH6.3.5.1_A] Please also refer to ES Chapter 5: Alternatives and Design Evolution of the ES [APP-042]. Impacts on the Waendel Walk are set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A], which identifies a significant adverse effect to users of the Waendel Walk due to direct impacts from the construction of Green Hill F, the Green Hill BESS site, and cabling works. The Applicant has committed to mitigation measures to limit the impacts to users of this route, and will continue to work with Wellingborough Town Council to ensure that suitable diversions if required are put in place for the Waendel International Walk annual event.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-069	Landscape and Visual Impacts	Site F visual impacts	Conclusion Site F represents one of the most landscape- and visually-intrusive elements of the Green Hill Solar project. Its siting directly west of Easton Maudit, disruption of recreational access, and long-term visual encroachment across the valley to Grendon, are all unacceptable in planning and environmental terms. These impacts cannot be mitigated adequately and violate core principles of landscape planning under the NPPF, NPS EN-1, and local North Northamptonshire policies. Accordingly, we strongly object to the siting and scale of Site F as currently proposed.	The Applicant notes this comment and refers to their responses to the points raised in 'SGHS-002 to SGHS-072' above.



5.16 Walgrave Parish Council

Table 5.20: [RR-1249](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WaPC-001	General Matters	Status of main issues	Walgrave Parish Council will be making more detailed comments once the application has been fully considered. Below is what are considered to be the main issues Visual impact on the landscape Environmental impact on wildlife Noise and light pollution Impact on property prices Impact on Newlands Road as a designated Quiet Lane Noise and disruption during construction phase Transport - vehicles passing through the village during construction phase Decommissioning – use and condition of land following decommissioning	The Applicant notes this comment and awaits further detailed comments from Walgrave Parish Council.



5.17 Wellingborough Walks Action Group Ltd

Table 5.21: [RR-1250](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WWAG-001	General Matters	Introduction	I am one of the Directors of Wellingborough Walks Action Group Ltd. We are a not for profit community organisation set-up in 2023 to work to protect trees and historic hedgerows in and around the Wellingborough area. Born out of the community's campaign to protect the 189 'TPO'd' trees on 'The Walks' in Wellingborough, 61 of which remain under threat due to the delivery of a major new road, we have dedicated ourselves to support our and other local communities to protect historic trees and hedgerows across our area.	The Applicant notes this comment.
WWAG-002	Arboriculture	Loss of trees at Grendon BESS	We were made aware of the massive potential impact to historic trees, woodland and hedgerows in the vicinity of the planned Green Hill Solar development by a local farmer in Grendon. He is fearful of up to 20 ancient Oak Trees on his land (which will boarder the main BESS site south of Grendon) being lost due to the siting of the BESS in a neighbouring field and the laying of cabling connecting this BESS site to the entire array systems passing through his land close to these ancient trees and hedgerows. We are concerned that given the vast area of the planned site across this extensive historic and green landscape (way beyond Grendon), where much field, tree and woodland layout	ES Figure 19.2.20 Tree Impact Plan Green Hill BESS and Cable Route Corridor Sheet 2 [APP-520] demonstrates that no veteran trees are proposed for removal at Green Hill BESS or the adjacent fields. It should be noted that no ancient trees were recorded at Green Hill BESS or the adjacent fields. The Applicant has made commitments to protect ancient and veteran trees specifically in the ES Chapter 27 Commitments Register [APP-064], these commitments include: • EN010170 – ARB – 03;



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			has not changed since being enclosed in the 1700's, that a great many trees, hedgerows and woodland areas in and around the site will be undermined and the vital bio-diversity that they support threatened, unless vital and genuine mitigations protecting trees, woodland and ancient landscape can be guaranteed throughout the whole life of the Green Hill Solar development and beyond (more than 60 years). By registering an interest we are committed to be 'a voice of the trees' in this process and to consistently raise these concerns throughout to ensure any development (and set-up works) always appropriately protect these vital and historic natural assets in our community in perpetuity.	• EN010170 – ARB – 04; • EN010170 – ARB – 10; • EN010170 – ARB – 21; and • EN010170 – ARB – 22. The above commitments work alongside a package of tree protection measures detailed in the Outline Arboricultural Method Statement - ES Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]. In addition, new tree and woodland planting is proposed across the Sites. 10.46ha of native woodland copse/shelter belt (scrub and tree planting) as well as 1.37ha of Native Tree and Scrub Planting - Instant Screening are proposed in OLEMP Revision A [EX1/GH7.4_A].
WWAG-003	Community Benefits	Direct community benefits	There are other crucial concerns we also have about the planned Solar development, including the fact that under the present scheme very little community benefit will be gained by people as a result of the scheme, and not least that no person living or working within 20 miles of any part of the scheme will receive any direct financial benefit, particularly in direct reductions in their energy bills, and instead will experience considerable disruption, possible loss of livelihood, and	Please refer to the response to 'CRNBPC-008' above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			extensive physical changes to the local landscape. These are vital points, but we will limit our focus to ensuring that the needs of the beautiful and historic trees, woodlands and hedgerows across this area are given proper voice in this process.	



5.18 Wilby Parish Council

Table 5.22: [RR-1252](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WiPC-001	Agriculture and Soils	Loss of BMV	The loss of the rural environment and the high grade farm land in the vicinity of Wilby village.	Please refer to the response to 'ScPC-002' above.
WiPC-002	Transport and Access	Impact on local highway infrastructure	The impact the construction of the site will have on the woefully inadequate local road infrastructure.	An assessment of construction traffic is provided in ES Chapter 13 Transport and Access [APP-050] . The submission includes an OCTMP Revision A [EX1/GH7.9_A] to manage movements.



5.19 Wollaston Parish Council

Table 5.23: [RR-1253](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WoPC-001	Agriculture and Soils Energy Need and Policy	Use of agricultural land for solar	The project is taking out an enormous tract of prime agricultural land increasing the need to import food stuffs to an island which has an increasing population. The ongoing trend of putting solar farms on prime agricultural land will lead to prime land remaining fallow and only going to increase the profits of wealthy land owners and increasing the cost of energy. There are plenty of sites around the county where solar panels can be sited. The whole county of Northamptonshire is blighted by large industrial warehouses which have large flat roofs. These can be strengthened to take the weight of solar panels, which are actually getting lighter, and leave the land to maintain a good supply of home grown food ingredients. As a country we have seen the shock of energy and grain cost increases due to war, do we need to see something similar that would mean that the UK would need to import even more food and increase the risk of the prices of commodities also increasing to heights not seen since the war with rationing coming into play and detrimental health and living standards issues. We do not disagree with the need to be energy self sufficient if that can be possible but blanketing the country in solar panels is an appalling misuse of the land that we have been gifted by our forefathers.	Please refer to the response to 'ScPC-002' above in relation to rooftop solar. Please also refer to the response to 'SGHS-004' above in relation to the Scheme's energy security benefits, and how the Scheme and others like it protect GB consumers from electricity price shocks associated with volatile international fossil fuel supplies.



6 The Applicant's Responses to Persons Whose Interests would be Affected by The Order

6.1 Bernard Livesey

Table 6.1: [RR-0118](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BLi-001	General Matters	Easton Maudit	Easton Maudit [E.M.] is a small conservation village of about 45 dwellings, surrounded by actively farmed undulating crop-bearing agricultural land on all sides and multiple public footpaths and bridleways in various directions. Its principal building is the Grade 1 Church of St Peter and St Paul, built in 1320, which stands as a beacon across the landscape to nearby villages and from which are uninterrupted views in all directions.	The Applicant notes this comment.
BLi-002	Landscape and Visual Human Health	Visual and amenity impacts	The Proposal would a) cause massive and irreparable damage to the landscape, the village and the amenity of the parishioners of E.M. and villagers beyond;	ES Chapter 8: Landscape and Visual Impact [APP-045] takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The assessment of community identity, culture, resilience and influence in ES Chapter 18: Human Health [APP-055] assesses the mental health and wellbeing



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				and social impacts of the development, and finds that whilst there will be some level of changes in amenity and perception of rurality in the surroundings, due to the visual and spatial relationship between Green Hill F and Easton Maudit, there is not anticipated to be any significant adverse effects to community wellbeing.
BLi-003	Agriculture and Soils	Food / agricultural security	b) and, because it involves substituting PV solar panels in place of crops, further reduces the ability of the UK to be resiliently self-sufficient in agricultural products;	The Scheme only results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing. The 1200ha land for the proposed Sites represents only 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK therefore it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Sites can serve as a strategic land reserve underpinning national food security. UK Food Security Report 2024 indicates that the 6.0 million hectares of the croppable



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%.
BLi-004	Air Quality Ecology and Biodiversity Major Accidents and Disasters	Battery Safety	c) and, because of E.M.'s proximity to the Battery Storage Systems [BESS] located nearby in Grendon, exposes E.M.'s parishioners to the risks associated with Lithium-Ion batteries, including thermal runaway, fire and explosion and the potential exposure to poisonous gases and chemicals, leading to injury, death of persons and potential serious damage to the protected birds at the Ramsar site downstream;	The Applicant's OBSSMP Revision A [EX1/GH7.7_A] stipulates how a BESS failure event can be prevented and mitigated to ensure that there are no significant offsite impacts for the local community. Section 6.1 of the OBSSMP stipulates the detailed risk analysis reports and rigorous consequence modelling reports to ensure significant fire, explosion, or toxic emission risks are fully mitigated. These key safety commitments are secured by Requirement 6 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. As outlined in ES Chapter 16: Air Quality [APP-053] and detailed in ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167], unplanned emissions from an accidental BESS fire during the maintenance phase of the Scheme have been modelled and mitigation measures have been proposed to ensure effects are not significant.
BLi-005	Consent Order	Liability Insurance	d) I am concerned that the Applicant has failed to give adequate information to identify sufficiently the type of batteries it proposes to acquire for BESS; nor has it	Within the DCO Application, the maximum design parameters of the battery storage are set out in Section 4.4 of ES Chapter 4: Scheme Description Revision A



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			given sufficient information to guarantee that any liabilities for damage inflicted to the population during the 60 years of operation will be indemnified by suitable commercial insurances or Bonds;	[EX1/GH6.2.4_A], and in the CDPP Revision A [EX1/GH7.17_A]. The Applicant has not specified the type of battery but the principle of setting out maximum parameters is considered to apply the Rochdale Envelope. This is an agreed method for defining the maximum (and where relevant, the minimum) parameters for the Scheme where flexibility needs to be retained to take advantage of improvements in PV panel technology. The exact battery design and specification will be decided at the detailed design stage but will need to meet the parameters set out in the CDPP Revision A [EX1/GH7.17_A]. This is secured in Schedule, Requirement 5 of the Draft DCO Revision A [EX1/GH3.1_A]. The BESS must be constructed in accordance with the OBSSMP Revision A [EX1/GH7.7_A], which comprehensively references and incorporates NFCC guidance within the safety documentation. A detailed Battery Storage Safety Management Plan and Emergency Response Plan can only be drafted at detailed design when the BESS design is selected and before construction commences. The OBSSMP Revision A [EX1/GH7.7_A] stipulates all key safety standards and codes, testing requirements, risk assessment reports, consequence modelling reports, and emergency response documentation requirements that the Applicant is committed to fulfilling. This is



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				secured through Requirement 6 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Before approving the final BSSMP, the relevant planning authority must also consult with Northamptonshire Fire and Rescue Service and the Environment Agency. The provisions in the draft DCO do not remove or limit the Applicant's liabilities to the general public in accordance with the law.
BLi-006	Consent Order Compulsory Acquisition	Works Plan	e) finally, I dispute the contention that the Applicant should be entitled to extend the boundary of its site from the Church westwards to the corner of Easton Way.	The Order Limit extends along Easton Way, westward from the church to allow construction activities and access into the cable route corridor which extends south from Green Hill F to the north, crossing Easton Way. The Draft DCO Revision A [EX1/GH3.1_A] is seeking powers to allow for the access to be constructed and for the cables to be laid below the road, with the area of highway included within the Order Limits being the area within which these activities may take place. The order limit allows for the protection of suitable visibility splays along the road which may require maintenance of hedgerows and also allows for appropriate traffic management where required.



6.2 Chris Aworth

Table 6.2: [RR-0180](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CAw-001	General Matters	Scheme Design	I would like to understand and be kept advised about the impact of the project on Mill Lane, especially the following aspects 1. any changes to its route, appearance, surface 2. how the access to The Mill House (at the bottom of Mill Lane) will be maintained 3. how the cables will be crossing the A45 and also the river (3 channels) 4. any change to the overhead cables that run roughly parallel to the to Mill Lane and then on Grendon sub-station 5. any impact on the services (water, electricity) that currently run under, over or alongside Mill Lane 6. any other way that the running of our house may be affected	The Applicant understands that this comment relates to Mill Lane in Earls Barton. As set out in the Works Plan Revision B [EX1/GH2.4_B], Work Number 8A covers Mill Lane (which falls within the Cable Route Corridor). This relates to works to facilitate temporary construction and decommissioning access and includes: a) creation of accesses from the public highway; b) creation of visibility splays; c) works to alter the layout of any street or highway temporarily; and d) offsite works adjacent to highways land including those to structures, boundary features, drainage features on private land required for the facilitation of movement of abnormal indivisible loads. Taking the numbered queries in turn: 1. The final detailed design will set out what works are required along this section of the Cable Route Corridor and the works required to Mill Lane. Mill Lane is a Byway Open to All Traffic, and any works required to make this suitable for access to the Cable Route Corridor will be shared with the relevant highway authority. 2. In Table 3.7 of the OCEMP Revision A [EX1/GH7.1_A] sets out that where existing access tracks are used that also provide access to residential properties, appropriate security measures will be put in place in consultation with the relevant property owner. During cable trenching works, the Applicant commits to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				continued liaison with the owners of Mill House to ensure residential access is maintained. 3. The areas of the Order Limit which cross the A45 and the River Nene are proposed to be crossed for Horizontal Directional Drilling (HDD) as set out in the Crossing Schedule [APP-562]. The design parameters of the HDD activities are set out in the CDPP Revision A [EX1/GH7.17_A]. 4 and 5. There are no proposed changes to the overhead lines. Where these and any other utility assets are located within the Order Limits, offsets from them are embedded into the Scheme design as set out in ES Chapter 24: Other Environmental Matters Revision A [EX1/GH6.2.24_A]. 6. The access via Mill Lane is the only part of this property which will be impacted. However, as set out above in response to point 2, mitigation measures will be put in place to ensure disruption is kept to a minimum.



6.3 David Richard Newton

Table 6.3: [RR-0267](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DRN-001	General Matters Human Health	The Scheme Human Health	This development is directly adjoining my property and Land and will greatly affect my family and there well being. ... It is adjacent to my farm and will have a major negative affect on our lives and well being.	The Applicant is cognisant that those living closest to the Scheme are most likely to be affected adversely by the Scheme. The assessment of effects to health and wellbeing of nearby residents and members of the communities closest to the Scheme has been undertaken and presented in ES Chapter 18: Human Health [APP-055], which assessed physical, social, and mental health and wellbeing impacts. Subject to mitigation, the Scheme is not anticipated to have any significant adverse effects on any measured receptor at any phase during the Scheme's lifetime. With specific regard to DRN-001, the Scheme has (since earlier pre-submission design iterations) been adapted by removing field FF21-FF24 from solar or ecological enhancement use, now only proposed for cable routing and access to fields FF7-FF19. Enhanced hedgerow planting along the boundary of FF19 and substantial new tree and scrub planting in FF25 have been set out in the OLEMP Revision A [EX1/GH7.4_A] to visually and spatially separate the Scheme from this and neighbouring properties once matured. This is assessed in ES Appendix 8.3: ES LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A], while the OLEMP is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



6.4 David Rust

Table 6.4: [RR-0268](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DRu-001	General Matters	The Scheme	We do not want to be surrounded by solar panels on arable land. Our countryside is being ruined for our children and grandchildren. An “eyesore” or a beautiful countryside? I choose the later.	With respect to the need for solar on arable land, please refer to the Applicant's response to 'SGHS-004'. With respect to the visual impact of the Scheme, please refer to the Applicant's response to 'BLi-002'.



6.5 Helen Elderkin

Table 6.5: [RR-0448](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HEI-001	Ecology and Biodiversity Major Accidents and Disasters Noise and Vibration	Ecology and Biodiversity Battery Safety Noise	The detrimental impact on wildlife and the surrounding countryside. Safety concerns regarding battery energy storage systems and noise emissions.	The Applicant's OBSSMP Revision A [EX1/GH7.7_A] and ES Appendix 16.2 BESS Fire Emissions Modelling Report [APP-167] detail how, in the unlikely event of a BESS failure, there will be no significant impacts within a 1 km radius of the BESS area. Full assessments of potential impacts upon habitats and wildlife are provided in ES Chapter 9: Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Mitigation measures to address potentially significant impacts are also outlined in the ES Chapter, and are provided in further detail in the associated documents, such as the OEPMS Revision A [EX1/GH7.5_A]. In addition, a Biodiversity Net Gain assessment completed for the project (available in ES Appendix 9.13: BNG Assessment Revision A [EX1/GH6.3.9.13_A]) concluded that significant net gains (beyond 10%) in the sites' value for biodiversity are anticipated. Of the species mentioned in Chapter 9, all are considered likely to be present within the Sites and the local landscape, with the exception of dormice, which have been scoped out of the assessment. This was agreed by the Planning Inspectorate in their Scoping Opinion comments on 30th August 2024 (Table 9.1 in ES Chapter 9: Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]). As detailed in ES Chapter 14 Noise and Vibration [APP-051], noise modelling has been completed which assesses the noise levels associated with the Battery Energy Storage Systems. All impacts are deemed either negligible or low, with residual effects deemed not significant.



6.6 Helen Marriott

Table 6.6: [RR-0452](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HMa-001	Agriculture and Soils	Use of agriculture land Rooftop solar	I support green energy and my own home has solar panels and electric car. However, I am concerned that this scheme is proposing to cover farmland with solar panels instead of ensuring solar panels are required to be installed on all new homes and commercial developments in the area - of which there are many. Why would we not do that? My concern is that our green energy and our building projects to date have mostly been lazy uninspired designs not in line with stated aspirations. It is time to stop and for future designs to build a beautiful landscape designed for modern life, living and global warming. Covering farmland with houses or energy farms in this case, because it is the cheapest quickest and easiest way to build at scale is not acceptable. It erodes and does not enhance our environment. This is more of the same lazy development, the quickest and cheapest solution rather than the best solution. Let us aspire to better than this for our solar energy. There must be existing schemes and designs already in use somewhere in the country or world that are already doing this. This area has not been developed attractively, let's get on the map for doing something fabulous instead of ugly and utilitarian.	The proposed development for solar panels and cable route only result in temporary loss of productive farmland as the land for solar panels will be still in agricultural use as grassland for grazing and the land for cables will be reinstated after the laying of the cables in a short period. An OSMP [APP-550] has been prepared for soil handling during construction and soil mitigation measures are committed to protect soils during construction, operation and decommissioning to ensure that soils and land are reinstated to previous functionality and quality. The conversion of arable land to grassland for solar panel sites would be a long-term fallow and will remove disturbance on the soils and will result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term. These measures are secured through Requirement 19 of Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. The Applicant addresses brownfield and rooftop developments in Section 7.3 of the Statement of Need [APP-556], in particular



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				the constraints and limitations of rooftop solar and the benefits of transmission connected solar. In summary, a very large number of commercial rooftops would be required to deliver a utility-scale solar farm. This would require multiple land ownerships, and the legal complexities involved in combining multiple sites of this nature would be prohibitive. The government recognises rooftop solar as being clearly desirable, both on residential and commercial premises. However, rooftop solar energy cannot be considered as a reasonable alternative to the Scheme because rooftop solar alone will not be able to meet the scale and pace required of new capacity growth to meet the UK's needs. Therefore utility-scale ground mounted solar schemes are also needed. Roof-mounted solar panels should still be deployed in addition to utility-scale solar farms but should not be deployed instead of them. The design of the Scheme has undergone an iterative development process involving collaboration between the Applicant, design team, and the environmental consultant team. This process has been informed by feedback received through various consultation activities, including engagement with stakeholders, statutory consultees, host authorities, local communities, and residents.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Design Approach Document demonstrates how the fundamental principles of good design have been embedded throughout the Scheme, which has been shaped by a series of design principles and parameters. These principles as outlined in the Concept Design Parameters and Principles document demonstrate the landscape-led approach undertaken to the Scheme, application of the mitigation hierarchy and delivery of net gain. Parameters such as offset distances were informed by the technical consultant team, drawing on professional judgement and experience with solar developments. This approach allows for the retention and enhancement of existing on-site vegetation, with the use of substantial landscape proposals to provide mitigation and landscape benefits. The Landscape and Ecology Mitigation Plans [APP-207 to APP-219] and Table 8.11 of ES Chapter 8: Landscape and Visual Impact [APP-045] sets out the quantity of landscape enhancements the Scheme would provide: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				• 43.14km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and • 1,079.53ha of groundcover. The above is delivered with regard to the long-term betterment of the fabric and character of the landscape following decommissioning, or the Legacy landscape. Legacy Landscape is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, agricultural fields would be returned back to agriculture. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				enhancing the overall character and providing considerable biodiversity benefits over the years. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.



6.7 James Clegg

Table 6.7: [RR-0490](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
JCI-001	Compulsory Acquisition Socio-Economics, Tourism and Recreation	Loss of rented land	This solar farm project is going to impact mine and my family's future as we farm in the area and we will lose some rented land which we graze on and also it will heavily impact our equestrian business as we won't be able to exercise horses near the proposed site.	The Applicant has identified that this respondent currently has an informal arrangement with a tenant to graze on an area of land within the Scheme. The Scheme does not directly affect land in which this respondent holds a formal interest. Equestrian businesses and facilities with public access (such as riding schools) likely to be impacted by the Scheme have been assessed in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] due to their economic and recreational function. The assessment identifies no greater than a moderate-minor effect (and therefore not significant effect) to the equestrian facility at Hockerhill Farm Livery due to the Scheme at any phase. The Scheme is proposing a permissive path for use by horse riders in this area, which will allow continued exercise of horses in this area.
JCI-002	Socio-Economics, Tourism and Recreation	General impacts from the Scheme	This will destroy our family business as well as impact the wildlife and affect the local road network.	An assessment of the likely significant impacts on wildlife is included in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] . An assessment of the likely impact on the local road network is included in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Ecology and Biodiversity Transport and Access			ES Chapter 13 Transport and Access [APP-050].
JCI-003	Agriculture and Soils	Quality of agricultural land	This site is proposed to be built on grade A farm land, how else do we feed the country at an affordable price	Please refer to the Applicant's response to 'SBMP-001' and 'SBMP-002'.



6.8 John Hope (Trinity Land)

Table 6.8: [RR-0560](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
JHo-001	Ecology and Biodiversity	Wildlife habitats	Ruin wildlife habits	The OLEMP Revision A [EX1/GH7.4_A] provides an overview of how the ecology mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives. This plan demonstrates how the land within the Scheme will be managed for the benefit of biodiversity.



6.9 Jonathan Fenn

Table 6.9: [RR-0574](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
JFe-001	Electromagnetic Fields	EMF impacts	I OBJECT to Green Hill Solar Farm for the following reasons: Radiation risk to me and my family.	The Applicant has assessed the likely impact of electromagnetic fields on health from the Scheme as being negligible in ES Chapter 18: Human Health [APP-055] , and therefore not a significant effect. ICNIPR reference levels of 100 μ T (at which potential health effects from EMF should be monitored, but are not expected to manifest) are not anticipated to be exceeded by any part of the Proposed Scheme.
JFe-002	Hydrology, Flood Risk and Drainage	Flood events in Easton Maudit	Easton Maudit has flooded in the last few years due to climate change and taking away natural drainage by building on fields will only increase flooding in the area.	The Applicant notes the concerns raised. It is acknowledged that parts of Easton Maudit have experienced flooding in recent years. The proposed development cannot resolve existing baseline flood conditions, but it will not increase them. Flood risk has been assessed in the FRADS Report Revision A [EX1/GH6.3.10.1_A] and the supporting annexes, which confirm that the majority of the Order Limits lie in Flood Zone 1 and that runoff from the development will be restricted to greenfield rates with on-site attenuation and safe exceedance routing. As assessed in the ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A], the majority of the Scheme comprises solar panels, which research (Cook & McEwan, 2013; BRE, 2014) demonstrates do not materially increase runoff because rainfall continues to infiltrate between and beneath rows. The principal risk arises from soil compaction, which is managed



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				through the OCEMP Revision A [EX1/GH7.1_A] and the OSMP [APP-550] . Accordingly, while existing flooding in Easton Maudit is recognised, the submitted assessments confirm that the proposed development will not increase flood risk in the village or elsewhere.
JFe-003	Alternatives and Design Evolution	Scheme location	Destroying an area of natural beauty, Hamlets should be the last place to consider building solar farms around once all industrial sites and built-up areas have been exhausted	Please refer to the Applicant's response to 'HMa-001' above.
JFe-004	Ecology and Biodiversity	Impacts on ecology	Destroying the natural habitat of protected wildlife, bats, owls etc...	Please refer to the Applicant's response to 'HEI-001'.



6.10 Martin Howell

Table 6.50: [RR-0768](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MHo-001	Socio-economics, Tourism and Recreation Transport and Access	Public Rights of Way	I have several concerns about how the proposed Greenhill Development will negatively impact me, my family and my lifestyle if given the go ahead. Right of Way concerns – I have a Right of Way from my farm, across the some of the fields proposed for the BESS installation, onto the access road for the sub station and onto Station Road. This has not been reflected anywhere in the DCO.	The likely effects of the Scheme on socio-economic conditions, has been assessed in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]. This assessment considers changes to industries (such as agriculture, tourism, construction, accommodation services) rather than impacts on individuals or individual businesses. With respect of likely impacts on health, wellbeing, and lifestyle, these are assessed in ES Chapter 18: Human Health [APP-055] which find no significant adverse effects to human health and wellbeing. This includes assessment of mental health and wellbeing and social impacts of the development, and finds that whilst there will be some level of changes in perception of rurality in the surroundings (in village such as Grendon), there is not anticipated to be any significant adverse effects to personal or community wellbeing. The Applicant has been in communication with this respondent in respect of their private interest (their private right of access) and this is



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				recorded in the Book of Reference Revision B [EX1/GH4.3_B] . The private right of access crosses the BESS Site and the proposals for the Scheme do not interfere with its use. The Scheme has been designed such that the private right of access falls outside the boundary of the development, ensuring it can continue to be used throughout the life cycle of the Scheme.
MHo-002	General Matters	Cumulative Impacts	BESS Concerns Cumulative Impact Statera Energy already operates a 49.99MW BESS installation and have secured planning permission for a second 49.99mw installation in the vicinity of the Greenhill Solar proposal. The Greenhill BESS of up to 500mw would add a third large-scale lithium-ion battery site in close geographic proximity, which would dramatically increase the industrial scale of battery installations in a concentrated rural setting, significantly intensifying risk, infrastructure stress, and environmental pressure. Local plans (North Northamptonshire Joint Core Strategy) stress the need to avoid infrastructure clustering that results in environmental harm or cumulative pressure on rural areas. There is a requirement for an explicit cumulative assessment under EIA/HRA regulations if	A cumulative effects assessment has been prepared for the Application within the Environmental Statement [APP-038 to APP-064]. Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see ES Chapter 2: EIA Process and Methodology [APP-039]). This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			additional large-scale BESS is permitted adjacent to an already consented installation. No cumulative Flood Risk Assessment (FRA) or hydrological study has been published combining all three sites. YET NO CUMULATIVE IMPACT ASSESSMENT HAS BEEN UNDERTAKEN AND INCLUDED IN THE DCO	
MHo-003	Major Accidents and Disasters	Battery Safety	BESS Concerns Safety The Greenhill BESS site lies 110m from the nearest residential dwellings and 500m from the centre of the village. THERE IS NO PUBLISHED BSMP IN THE DCO (Battery Safety Management Plan) merely an outline which lacks detail of emergency protocols, evacuation procedure, worst-case plume scenario analysis, design specifications, or anything concrete that can be reviewed. Other planning authorities (e.g. Suffolk for Sunnica) have refused or delayed BESS approvals until these fundamental plans are in place. There are no enforceable commitments to NFCC standards, yet other NSIPs (e.g Cleve Hill, Peartree Hill) have managed to do so.	The Applicant's OBSSMP Revision A [EX1/GH7.7_A] and ES Appendix 16.2: BESS Fire Emissions Modelling Report (Plume Study) [APP-167] identify that the closest residential property is 201 m from the BESS Area. The closest residential property to Green Hill C BESS area is 338 m. The Plume Study demonstrates that there are no significant impacts within a 1 km radius of each BESS area. The Plume study incorporates both National Fire Chiefs Council (NFCC) and UK Health and Security Agency (UKHSA) recommendations for Plume Study requirements. The OBSSMP Revision A [EX1/GH7.7_A] comprehensively references and incorporates NFCC guidance within the safety documentation. A detailed Battery Storage Safety Management Plan and Emergency Response Plan can only be



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				drafted at detailed design when the BESS design is selected and before construction commences. The OBSSMP Revision A [EX1/GH7.7_A] stipulates all key safety standards and codes, testing requirements, risk assessment reports, consequence modelling reports, and emergency response documentation requirements that the Applicant is committed to fulfilling. This is secured through Requirement 6 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Before approving the final BSSMP, the relevant planning authority must also consult with Northamptonshire Fire and Rescue Service and the Environment Agency.
MHo-004	Ecology and Biodiversity	Special Protection Areas BESS	There is a serious risk to protected wetlands. The Upper Nene Valley Gravel Pits SSSI, SPA, and Ramsar site lie adjacent (within ~100 m) to the BESS site. No containment plan exists for toxic firefighting run-off, chemical spillages, or airborne emissions from a BESS incident. The absence of modelling of discharge pathways or hydrological barrier measures is unacceptable in the context of Habitats Regulations and ecological safeguarding.	Please refer to the Applicant's response to 'SGHS-014'.
MHo-005	Cultural Heritage	Heritage Assets Visual effects	LVIA concerns Site F lies immediately west of Easton Maudit, within 30m of the village and its Conservation Area, and is highly visible from both Easton	ES Chapter 12: Cultural Heritage [APP-049] , supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120] , has identified a Moderate



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Landscape and Visual		Way and the surrounding lanes. The village contains multiple Grade II and Grade I listed buildings*, including the Church St Peter & St Paul Grade I* whose elevated position gives long-ranging views over Site F towards St Marys Church Grendon Grade II*, St Romwalds Church Strixton Grade II and St Mary the Virgins Church Bozeat Grade I. The LVIA critically understates the level of visual harm in this location by: Omitting key viewpoints from the public footpaths and roads west of the village; Omitting to include in the DCO suggested viewpoints made by NNC, namely, NN8/9/10/11 Critically underplaying viewer sensitivity from heritage settings and homes. GLVIA3 guidance requires views from heritage assets and Conservation Areas to be treated with High sensitivity — this has not been reflected in the applicant's assessments for Site F.	adverse effect would occur as a results of the Scheme on Easton Maudit Conservation Area and the Church of St Peter and St Paul (NHLE:1189610) (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). Mitigation in the form of removal of solar panels from Fields FF9, FF13, FF14, FF16 and FF22, and offsets in Fields FF11, FF15, FF19 and FF26. Visual corridor retained between Churches in Grendon, Eastern Maudit and Bozeat with visual corridors retained along PROW with historical associations / views between heritage assets and enhanced screening of existing hedgerow and tree belts has been proposed to protect the Church of St Peter and Paul. ES Chapter 8: Landscape and Visual Impact [APP-045] includes a suite of viewpoints that cover a wide range of visual receptors, including public locations such as transport routes, PROW and residential properties. Viewpoints have been selected to represent the experience of different types of visual receptor, including users of PROW, residential properties, transport routes, heritage, and recreational sites. Selected viewpoints



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				include specific locations that are popular vantage points or tourist destinations, and those suggested through Section 42 and Section 47 consultation. Viewpoints have also been selected to illustrate landscape character effects or likely Cumulative Effects of the Scheme. A series of 'representative and specific viewpoints' are shown on ES Figures 8.10 [APP-308] to 8.10.5 [APP-313]. Verified photography and photomontages are shown on ES Figure 8.14.1 [APP-334] to Figure 8.14.13 [APP-346]. Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives for North Northamptonshire.
MHo-006	Human Health Landscape and Visual Socio-economics, Tourism and Recreation	Visual Effects Recreation Human Health	Several PROWs/Bridleways (e.g., TP 174/181/184/185/186/TP201) traverse or run directly adjacent to Site F. These routes are key for community access to the countryside and serve recreational walkers, riders, and visitors, including the annual Internationally Acclaimed Waendel Walk attracting up to 3000 visitors per year and the route regularly encompasses many of these paths and brings visitors to both villages.	Please refer to the response to 'SGHS-069' and 'SGHS-070' above. ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] recognises the shift from open agricultural farmland to large scale solar infrastructure stating that the character of the Sites themselves and their immediate surroundings would be adversely affected, with the land now presenting as a large scale solar



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The solar arrays and fencing will truncate or divert these paths, forcing walkers to navigate through or alongside industrialised corridors of security fencing and panels. This fails to comply with both North Northamptonshire Joint Core Strategy (Policy 3 & 8) – which protects local green infrastructure and access to countryside; and NPPF which requires planning decisions to protect and enhance PROWs and their settings. Grendon and Easton Maudit are rural farming communities. The development threatens the very character of these historic Conservation villages. The topography between Easton Maudit and Grendon forms a gentle valley of undulating arable land, currently offering expansive open views across the landscape, forming a key part of local identity. Site F, around 3 sides of Easton Maudit together with cable corridors and perimeter fencing, will result in: Severance of visual continuity between the two villages; Perceived coalescence of industrialised land into what is now tranquil and historic countryside; A breakdown of the area's spatial coherence. NNC's own Landscape Character Assessment (2006) classifies the area as "Undulating Hills and Valleys – Rural character with high visual sensitivity."	scheme leading to Significant adverse effects on local landscape character. However, this needs to be considered against the ability of the receiving landscape to accommodate the low lying infrastructure. Within the study area there would be limited appreciation of the array or associated infrastructure, with the integrity of the character of the wider receiving landscape preserved, along with all landscape features within retained and enhanced. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now presenting as a large-scale solar scheme. The Scheme comprises a series of independent areas of land or Sites set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PROW and transport routes which further assist with its integration and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme will not be perceived in its entirety, and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern. This 'network of sites' approach demonstrates good design by allowing for a fine-tuning approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing, and provide enhanced landscaping and vegetation. This



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				demonstrates how the Scheme is sensitive and responsive to place. Buffers outlined in Table 8.8 of ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] have been embedded into the design of the Scheme. This includes the provision of 15m buffers from PRoW to create a 30m wide corridor between fence lines maintaining their setting and openness. The Landscape and Ecology Mitigation Plans [APP-207 to APP-219] have been iteratively designed to maintain existing PRoW and provide new permissive paths enhancing access throughout the receiving landscape.
MHo-007	Transport and Access	Construction traffic routes	Solar development of the scale and density proposed at Site F is incompatible with this classification Transport concerns Inappropriate Use of Narrow Village Roads – e.g. CC4 Compound Yardley Road. Yardley Road is a narrow, rural lane with no pavements or road markings and barely allowing 2 cars to pass in places. The use of this road for repeated access to Compound 4 is inappropriate and; Poses a risk to pedestrians, cyclists, children, equestrians and vulnerable road users, Would pass Grendon Primary School, increasing collision risk during school hours, Passes the football ground increasing the potential for collision during matches/training of children.	Construction routes are defined in the OCTMP Revision A [EX1/GH7.9_A]. Access from Yardley Road will be used as a crossing point for the use for cable route construction traffic and is to be controlled by temporary traffic measures (such as stop/go boards) or banksmen to ensure HGVs are held back from crossing when non-vehicular traffic is present. These measures are secured by Requirement 15 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. HGV traffic is not proposed through Grendon or past the school.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Passes the village allotments increasing the potential for collision with pedestrians. Has not been shown to meet visibility splays, turning radii, or structural load capacity suitable for large construction traffic. This violates Department for Transport (DfT) guidance on safe rural road use and runs contrary to DfT guidance and North Northamptonshire highways standards, which require detailed assessments where impact on local rural roads is anticipated.	
MHo-008	Transport and Access	Cumulative assessment	There is no Assessment of Cumulative Transport Exposure. The Transport and Access documents do not consider cumulative impacts of multiple site developments and cable corridors, concurrently operating on the same rural road network at the same time. Nor does it consider the cumulative impacts of the recently granted Statera 49.99 MW BESS site in Grendon, or the existing Statera BESS installation. For Greenhill Grendon BESS and site F alone, this amounts to 283 daily movements including HGV and LGV for up to 24 months. Highways policy requires cumulative volume and structural modelling, particularly when multiple infrastructure proposals use the same routes; this is missing in the DCO. CTMP contains no phasing plan to prevent simultaneous closures of key access roads, such as: Yardley Road, Station Road, Grendon Road leading to the A45 Main Road Grendon to Hardwater Road. Easton Way Potential scenario: closure of these routes could cut off all access to/from Grendon, including emergency	A cumulative effects assessment has been prepared for the Application within ES Chapter 13 Transport and Access [APP-050] . This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			services. Impact on Residential Amenity and Heritage Grendon is a conservation village with multiple listed buildings. The introduction of frequent HGV traffic:	
MHo-009	Cultural Heritage Noise and Vibration	Risk to properties	Risks vibration damage to heritage properties, Erodes the character of a tranquil, historic settlement, and Harms the setting of listed buildings contrary to Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposal lacks a proper heritage impact assessment for HGV routing and construction-related visual/sensory intrusion. These are but a few of my concerns which will, if granted definitely affect me in a very negative way.	ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed the potential impact of the scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Chapter 12: Cultural Heritage [APP-049] for embedded mitigation and Section 12.11 for additional mitigation). Two heritage assets were identified where there is a potential for vibration impacts as a result of construction traffic during the construction phase, the Grade II Listed Station Lodge (NHLE 1294156) and Low Farmhouse (NHLE 1371681). It was agreed during consultation (see ES Appendix 12.8: Consultation Tables [APP-148]), that a condition survey would be sufficient mitigation before and after the construction phase. Any impacts would be avoided through the implementation of an OCTMP Revision A [EX1/GH7.9_A]. Identified impacts to listed buildings would be indirect and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				related to elements of their setting that contribute to their significance. As detailed in the ES Chapter 14 Noise and Vibration [APP-051], a noise and vibration assessment has been completed which assesses the noise and vibration levels associated with the construction, operation and decommissioning of Green Hill BESS. All impacts are deemed negligible to medium, with residual effects deemed not significant.
MHo-010	Agriculture and Soils Cultural Heritage Hydrology, Flood Risk and Drainage Landscape and Visual	The Scheme	Site is unsuitable for solar farm due to flood concerns, SSI sites nearby, Heritage sites close by, proposal is on good farmland. The land is rolling farmland and the panels will be clearly visible from many population centres roads etc	The Applicant notes the concern regarding flood risk. Flooding has been assessed in the FRADS Report Revision A [EX1/GH6.3.10.1_A] and the supporting annexes [APP-098 to APP-108]. These confirm that the majority of the Order Limits lie in Flood Zone 1, with only limited areas intersecting Flood Zones 2 and 3, and that all sensitive infrastructure including substations and the BESS are located outside the modelled design flood extent. Runoff from the Scheme will be managed through sustainable drainage systems, restricted to greenfield rates with on-site attenuation and safe exceedance routing, as secured through Requirement 11 of the Draft DCO Revision A [EX1/GH3.1_A]. The assessments conclude that the Scheme



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				will not increase flood risk to people, property or designated sites. ES Chapter 12 Cultural Heritage [APP-049], supported by ES Appendix 12.7 Historic Landscape Assessment [APP-147], has assessed the potential impact of the scheme on the historic landscape character. No significant effects were identified on the historic landscape character as a result of impacts caused by the Scheme. ES Chapter 8: Landscape and Visual Impact [APP-045] assesses views of the array from residential properties and takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15).



6.11 Maureen Rust

Table 6.61: [RR-0792](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MRu-001	Agriculture and Soils	Use of agricultural land Rooftop	This will ruin our countryside surroundings and views across the valley. This is a picturesque setting and green space should not be used for solar panels. Put them on the roofs of all these new huge warehouses that are being put up on industrial estates or on all the new houses being built. We need our green spaces for health, body and mind and for farmers to keep as arable land. Our children/grandchildren should not have to grow up surrounded by solar panels instead of green spaces	With respect to the need for solar on arable land, please refer to the Applicant's response to 'SGHS-004'. With respect to the visual impact of the Scheme, please refer to the Applicant's response to 'BLi-002'. With respect to the use of rooftops for solar, please refer to the Applicant's response to 'HMa-001' above.



6.12 Melisa French

Table 6.72: [RR-0796](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MFr-001	Human Health Major Accidents and Disasters Climate Change	BESS Fire Safety Embodied GHG calculations	BESS will be sited too close to residential property and on a flood plain. Potential Health Issues of this proximity have not been addressed nor has the pollution and fire risk impact. The Nene Valley waterway is recognised as a valuable wildlife reserve. We already know that batteries cannot store energy long term, and their chemical content is a major contaminant should there be a battery fire which is likely. Solar panel production at source has a negative impact on the environment and global warming. More information is needed on the production and specification of such a large quantity of panels. Global warming needs more mindfulness on behalf of all countries not just getting brownie points for our own!	The Applicant has commissioned a Plume Study (ES Appendix 16.2: BESS Fire Emissions Modelling Report [APP-167]) to demonstrate that there are no significant impacts on sensitive receptors within a 1km radius of a BESS area. The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation (during the construction phase of the Scheme) to decommissioning. At the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. The OBSSMP Revision A [EX1/GH7.7_A] stipulates how all pollution and fire risks will be prevented or fully mitigated. Section 6 of the OBSSMP defines all key safety standards, testing requirements, and risk assessment tools that must be fulfilled or commissioned before construction can commence. This is secured through Requirement 6 in Schedule 2 the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The assessment of human health effects in ES Chapter 18: Human Health [APP-055] considers the health effects of battery fires on air quality, and the potential risks to land and water from pollutants and contaminants. On the basis that subject to good practice and mitigation measures, no significant effect is considered likely for air quality, land quality, and water quality impacts, no respective significant effect on human health and wellbeing is anticipated. The Applicant is aware that the production of solar panels and their transport are the largest contributing factor of the Scheme towards greenhouse gas emissions, as highlighted in ES Chapter 7: Climate Change [APP-044]. These are therefore included in the assessment of GHG emissions from the Scheme. Paragraph 5.4.7 of the OSSCEP [APP-552] states that "All international suppliers will be held to a minimum quality with regard to professional and ethical working practices as agreed by the members of Solar Energy UK." This therefore extends to an international suppliers' environmental performance. The Applicant confirms that a detailed Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MFr-002	Ecology and Biodiversity	Impact on species	Rare wildlife impact for Muntjac Deer, Water Voles, Dormice, Hedgehogs, Great Crested Newts, skylarks and a variety of rare bats in this area which are protected by the wildlife and countryside Act 1981; .and European Protected Species on Schedule 2 of the 'Conservation of Habitats and Species Regulations 2017', which gives them full protection under Regulation 41. extended by the 'CRoW Act'..	Please refer to the Applicant's response to 'HEI-001' in regard to general impacts on wildlife.
MFr-003	Agriculture and Soils Electromagnetic Fields Hydrology and Flood Risk	Soil degradation EMF Flood Risk	No regard has been made for soil degradation as a result of the Electro Magnetic Fields causing irreparable damage from the heat refraction and EMF's which will bake and change of chemical composition of soil and microbes causing more severe flood risks and flash flooding for this already prone area.	There is no evidence that electromagnetic fields would cause a change of chemical composition of soil and irreparable damage to microbes. Therefore, the assessment of impact from cable heat on soils was scoped out. Please see the Scoping Opinion adopted by the Secretary of State [EX1/GH6.3.2.2_A] at ID 3.3.2. Field Research from Germany (Emmerling <i>et al</i>, 2025, Operational Soil Warming by Underground Transmission Lines Impacts on Soil Microorganisms and Related Metabolic, Journal of Plant Nutrition and Soil Science Activities) into the effect of warming from underground cables found substantial evidence that the operation of underground cables does not have any critical impact on soil microorganisms and their metabolic activities. The Applicant notes the concerns around flooding. Flood risk has been assessed in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				the FRADS Report Revision A [EX1/GH6.3.10.1_A] and the supporting annexes [APP-098 to APP-108]. These confirm that surface water runoff from the Scheme will be restricted to greenfield rates with attenuation and exceedance routing contained within the Order Limits. As identified in the ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A], the principal risk arises from soil compaction during construction, which is managed through the OCEMP Revision A [EX1/GH7.1_A] and the OSMP [APP-550]. Research (Cook & McEwan, 2013; BRE, 2014) shows that solar panel arrays do not materially increase flood risk, as rainfall continues to infiltrate between and beneath rows, with drip lines dispersed across vegetated ground. In the long term, the change of use from intensively farmed arable land to managed grassland beneath and between panels is expected to improve soil condition and infiltration. The assessments therefore confirm that the Scheme will not increase flood risk or lead to flash flooding.
MFr-004	Agriculture and Soils	Food Security	We must retain security of food production and studies show this adverse effect on the environment	The applicant agrees that security of food production is an important issue. To protect soils and land quality, the applicant has prepared an OSMP [APP-550] and committed soil mitigation measures to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				protect the soils and the land during construction, operation and decommissioning stages, and return the land to its previous functionality and use. These measures are secured through Requirement 19 of Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. The land of the proposed Scheme is also not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to the landowners in a condition where they are able to continue the existing agricultural use after the Scheme life cycle. The 1200ha land for the proposed Sites can serve as a strategic land reserve underpinning national food security. The Applicant has undertaken a 5-Stage Site Selection Process, widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area ES Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] in compliance with National Policy Statement for renewable energy infrastructure (EN-3), which is the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				furthest distance that the Applicant sought to locate the Scheme from the Point of Connection on commercial feasibility and the efficiency of the transmission of electricity to the grid. The search outcome indicates that the majority of the land within the 20km search area is Grades 3 or 2 land with high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results of the Scheme.
MFr-005	Ecology and Biodiversity Hydrology, Flood Risk and Drainage	Water pollution	This is an area of natural beauty and watercourses and is not suitable for this type of installation which could potentially pollute water supplies for millions of people across the UK	The Applicant notes the concern raised. Potential effects on water quality have been assessed in the FRADS Report Revision A [EX1/GH6.3.10.1_A] and the supporting annexes [APP-098 to APP-108], the Water Framework Directive Assessment Revision A [EX1/GH7.22_A], and the ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A]. These confirm that the Scheme incorporates embedded measures to prevent pollution, including lined containment for hazardous materials, isolation valves, and firewater retention systems for the BESS as set out in the OBSSMP Revision A [EX1/GH7.7_A]. Construction-phase risks such as sediment or accidental spills are addressed through the OCEMP Revision A [EX1/GH7.1_A] and the OSMP [APP-550], which secure



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				pollution prevention measures in line with Environment Agency guidance. With these measures in place, the assessments confirm that the Scheme will not pose a risk to water supplies or to downstream designated sites.
MFr-006	Transport and Access	Public Rights of Way	The proposed sites will also cover many public footpaths blocking public access which contravenes the Countryside Act 1968.	During construction, the routing of PRowS within the Order Limits are to be protected and will be kept open wherever feasible and safe to do so. Any closures or diversions, such as for cable laying and landscape planting will be temporary in nature, with sufficient prior notice given of closures, and diversion routes clearly signposted. These measures are set out in the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
MFr-007	General Matters	Components of the Scheme	More research needs to be carried out on the suitability and longevity of this type of installation and maintenance over the expected useful life and the current use of chemicals to intermittently clean them further polluting watercourses. A hot government topic is currently preparing the UK for war issues. How does the government expect to feed everybody when they are wasting our natural resources in this manner? There are alternative solutions such as getting developers to include for	The Applicant will not use chemicals to clean the panels – only water – as stated in section 2.11 of the OOEMP Revision A [EX1/GH7.2_A]. The Applicant notes the comments on national defence and planning policy. With respect to the need for solar, please refer to the Applicant's response to 'SGHS-004'.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			solar on all properties they build both residential and commercial effectively using these buildings as a 'battery' and naturally reducing taxpayer costs.	Please refer to the Applicant's response 'HMa-001' above in relation to rooftop solar.
MFr-008	Cultural Heritage	Heritage assets	The villages in this area are notably historic sites and buildings classed as the 'Garden of England' so the infrastructure is not there for this project.	ES Chapter 12 Cultural Heritage [APP-049] , supported by appendices [APP-121 to APP-146 and APP-149] has assessed the potential impact of the scheme on identified built heritage and archaeological assets. Where required, appropriate mitigation is proposed in the form of removal of solar panels and offsets, as well as enhanced screening of existing hedgerows and tree belts along approach roads into villages. See Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] for embedded mitigation and Section 12.9 for additional mitigation.
MFr-009	Transport and Access	Road network	The road network is not suitable for HGV vehicles which will cause damage to the roads which the council is already finding hard to manage.	The OCTMP Revision A [EX1/GH7.9_A] includes a commitment to undertake road condition surveys and to remedy damage caused by construction traffic associated with the Scheme. This is secured through Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] .
MFr-010	General Matters	Scheme Costs	These costs will be ultimately funded by the taxpayer whilst the corporate entity makes huge profits without putting anything back into the economy. It is interesting to note that Greenhill Solar has not paid any UK tax according to the filings at Companies House since the	Green Hill Solar Farm Ltd is a company registered in England and Wales liable for UK tax. It was incorporated in 2021; as such, it could not have paid tax in the period from 2002 to 2021 as it did not exist. Since its incorporation, the company has not generated a profit (and will not unless



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			first project in 2002. This is not a benefit to the UK taxpayer just a prospecting moneymaker for the directors.	the project is consented), which means that it has not yet had to pay tax. Assuming the project becomes operational, the Applicant would pay corporation tax in line with UK law. The project will also pay business rates on land which has previously not been liable for this, resulting in an increased tax income for the local authority.



6.13 Mr & Mrs Clegg

Table 6.83: [RR-0825](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
Cle-001	Compulsory Acquisition	Loss of rented land	I farm in partnership with my son and we will be loosing some rented land which land if this project goes ahead . This will impact our business and reduce our chances of expanding in the future, I am not just worried for my future but my sons and his children's future in our industry .	The Applicant has identified that this respondent currently has an informal arrangement with a tenant to graze on an area of land within the Scheme. The Scheme does not directly affect land in which this respondent holds a formal interest.
Cle-002	Socio-Economics, Tourism and Recreation Ecology and Biodiversity Transport and Access	General impacts from the Scheme	We also run an equestrian facility which this will impact heavily let alone the wildlife and the local road network .	Equestrian businesses and facilities with public access (such as riding schools) likely to be impacted by the Scheme have been assessed in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] due to their economic and recreational function. The assessment identifies no greater than a moderate-minor effect (and therefore not significant effect) to the equestrian facility at Hockerhill Farm Livery due to the Scheme at any phase. An assessment of the likely significant impacts on wildlife is included in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. An assessment of the likely impact on the local road network is included in ES Chapter 13 Transport and Access [APP-050].



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Scheme is also proposing a permissive path for use by horse riders in this area, which will provide improved connectivity in this area.
Cle-003	Alternative and Design Evolution	Location	I firmly believe there is better places to build a solar farm than on this beautiful historic part of Northamptonshire	Please refer to the Applicant's response to 'SAMP-003'.



6.14 Patricia Heslop

Table 6.94: [RR-0895](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PHe-001	Agriculture and Soils	Use of agricultural land Rooftops	I am concerned about the size of the project and the detrimental affects on an agricultural area both during construction and when it is in operation. Many rural villages will be affected and large areas of good agricultural land, with long-term affects on future food security for the country. Also tenant farmers losing acreage against their wishes may find it difficult to make their farms viable. This area has vast areas already covered by large warehouses, the roofs of which could be utilised to carry solar panels, without losing more good land. There are also many brown sites which could be used. Whilst I appreciate the importance of renewable energy for our future, I think this project is extremely short-sighted and would be very harmful to the area.	Please refer to the Applicant's response to 'MFr-004' with respect to use of agricultural land and food security. The land of the proposed Scheme is not being entirely removed from farming, as opportunity for sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life cycle, as secured through the ODS Revision A [EX1/GH7.3_A] by way of Requirement 21 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security. The Scheme is likely to remove up to 1,200 ha of land from arable use during the Scheme's lifetime. Of assessed landholdings impacted, this accounts for no more than a 27% loss of land to any individual landholding (as assessed in ES Chapter 20: Agricultural Circumstances [APP-057]), demonstrating that these farming businesses are likely to be able to continue to grow food whilst having a



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				more stable income stream available to them. With respect to land in arable use in North Northamptonshire, West Northamptonshire, and Milton Keynes City (134,000 ha⁶) this loss is less than a 0.9% loss in arable land area. Please refer to the Applicant's response to 'HMa-001' above in relation to rooftop solar.

⁶ Department for Environment, Food & Rural Affairs (2025). Numbers of holdings and agricultural activity by English County/Unitary Authority at 1 June each year: 2024. Available at www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june



6.15 Robert Hollis

Table 6.105: [RR-0986](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
RHo-001	Human Health Socio-Economics, Tourism and Recreation	Personal and property impact	My property (Redacted) of section A.2. This will impact my quality of life and the price of the property dramatically.	The Applicant is cognisant that those living closest to the Scheme are most likely to be affected adversely by the Scheme. The assessment of effects to health and wellbeing of nearby residents and members of the communities closest to the Scheme has been undertaken and presented in ES Chapter 18: Human Health [APP-055], which assessed physical, social, and mental health and wellbeing impacts. Subject to mitigation, the Scheme is not anticipated to have any significant adverse effects on any measured receptor at any phase during the Scheme's lifetime. Whilst the assessment finds that there will be some level of changes in perception of rurality in the surroundings (such as to properties on Kettering Road), there is not anticipated to be any significant adverse effects to personal or community wellbeing as a result. Impacts on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the Environmental Statement (see ES Appendix 2.2: EIA Scoping Opinion [EX1/GH6.3.2.2_A]). This is because there is no empirical evidence that industrial scale solar farms cause significant long-term adverse effects on property prices. Whilst it is



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				acknowledged that the majority of >50MW solar Schemes in the UK are not yet operational, studies from the USA and Netherlands do not show any definitive evidence of adverse effects between solar farms and property prices, and conclude that other external factors (such as wider property markets, macroeconomic trends, changes to local services such as schools and healthcare providers) are likely to be more important factors in changes to property prices. Furthermore, there is a difference between short-term troughs in property saleability during peaks in construction activity versus the long-term property value once the Scheme is operating and mitigation set in place.
RHo-002	Transport and Access	HGV impacts	In this area, I am the only property close to the proposed development, but the thought of extensive roadworks and lorries outside my front drive fills me with horror.	An assessment of construction traffic and the associated effects is provided in ES Chapter 13 Transport and Access [APP-050] . Impacts related to this property relate solely to Cable Route Access 2. The OCTMP Revision A [EX1/GH7.9_A] contains measures to manage construction traffic including appropriate routes and vehicle travelling at particular times.
RHo-003	General Matters Landscape and Visual Impact	Impacts on amenity	My property (Redacted). I have invested both financially and in time to move to a village and be part of village life, and if the proposal goes ahead, my home and land will be the opposite of the peaceful idyll I have now. Instead, I will be living in the middle of a construction site causing me	Impacts from dust, noise, and HGV movements on human health and wellbeing have been assessed in ES Chapter 18: Human Health [APP-055] and find no significant adverse effects to human health in any location surrounding the Scheme. This is subject to mitigation measures as set out in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Noise and Vibration		real noise and inconvenience and when built, the site will be a huge eyesore spanning several miles.	the OCEMP Revision A [EX1/GH7.1_A], which is secured by Requirement 13 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. As detailed in ES Chapter 14 Noise and Vibration [APP-051], noise modelling has been completed which assesses noise levels associated with construction, operation and decommissioning of the Scheme. The impacts are deemed either negligible or low, with residual effects deemed not significant. ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] includes an assessment of the impacts of the scheme on views from individual residential properties, groups of properties and settlements. Please refer to ES Appendix 8.3: LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] for details on Visual Assessment. ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] recognises the shift from open agricultural farmland to large scale solar infrastructure stating that the character of the Sites themselves and their immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme leading to Significant adverse effects on local landscape character. However, this needs to be considered against the ability of the receiving landscape to accommodate the low lying infrastructure. Within the study area there would be limited



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				appreciation of the array or associated infrastructure, with the integrity of the character of the wider receiving landscape preserved, along with all landscape features within retained and enhanced. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme.
RHo-004	Hydrology, Flood Risk and Drainage	Flooding	There is also the worrying danger of flooding as the fields will no longer be absorbing the water naturally and both waterways head straight through my property.	The Applicant notes the concern regarding flood risk. Flooding has been assessed in the FRADS Report Revision A [EX1/GH6.3.10.1_A] and the supporting annexes [APP-098 to APP-108]. These confirm that surface water runoff from the Scheme will be managed through sustainable drainage measures, with flows restricted to greenfield rates, on-site attenuation provided, and exceedance routing contained within the Order Limits. As assessed in the ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A], solar panels do not prevent fields from absorbing rainfall. Independent research (Cook & McEwan, 2013; BRE, 2014) demonstrates that rainfall continues to fall between and beneath the panels, with water dispersed evenly onto vegetated ground where it infiltrates in the same way as under existing conditions. The principal hydrological risk is soil compaction during construction, which is mitigated through



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				the OCEMP Revision A [EX1/GH7.1_A] and the OSMP [APP-550]. The change of use from intensively farmed arable land to managed grassland beneath and between the panels is expected to improve soil condition and infiltration, further reducing baseline runoff. The assessments therefore confirm that the Scheme will not increase flood risk to nearby properties or elsewhere.



6.16 Serien Partridge

Table 6.116: [RR-1061](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SPa-001	Compulsory Acquisition General Matters	Use of land	As the land owner of a designated area for the planned cabling to the planned Green Hill Solar Farm, I am strongly opposed to the plans on my land. Despite ongoing opposition of myself and many local residents, this has seemingly been ignored and over ridden. I therefore would like to lay out my concerns. My land can be found with the coordinates [...]	The Applicant notes this comment and confirms that the landowners have been in liaison with the Applicant through the pre-application process.
SPa-002	Arboriculture	New tree planting	The land has been in the family for many generations. With the help of financial grants from the local council, over the last three decades we have planted over 200 saplings to enhance the wooded area for habitats for native wildlife. It has since evolved into a sanctuary for many species.	Noted. A full tree survey of the Cable Route Corridor has been completed, the survey of this land and the potential impacts to trees can be seen in ES Figure 19.2.13 Tree Impact Plan Green Hill E and Cable Route Corridor Sheet 1 [APP-513] .
SPa-003	Alternatives and Design Evolution	Cable routing	The planned cables will cross a stream which is the boundary to my land. To lay a cable here could be impractical, when a more accessible route could be found to avoid this.	The consideration of alternatives has been undertaken within ES Chapter 5 Alternatives and Design Evolution [APP-042] . This includes the consideration of alternative sites (Section 5.5), alternative technologies (Section 5.6), alternative layouts (Section 5.7), alternative substation locations (section 5.8) and alternative cable routes (Section 5.9). The stream is identified as a feature that will require crossing by Horizontal



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Directional Drilling (HDD) rather than by open trenching during cable construction. This is designated crossing 'HV_SP8566_001' in the Crossing Schedule [APP-562] .
SPa-004	Ecology and Biodiversity	Impacts from construction traffic	The work traffic access is an ecological and safety concern. With the planned cables so close to the wooded quarry area, it would be impossible to install the cables without disturbing or destroying the woodland and its wildlife	The woodland in question is understood to lie outside of the Order Limits, and therefore no entrance into the woodland, storage of materials therein, or other works which may result in the destruction of the woodland would be permitted during the cable installation works. Additional measures to minimise the risk of indirect impacts (such as pollution and disturbance) are provided in the OEPMS Revision A [EX1/GH7.5_A], and include the use of Biodiversity Protection Fencing, controls on completing works during prolonged periods of wet or dry weather, the minimisation of water and sediment runoff, and the sensitive use of artificial lighting during construction to minimise light spill onto woodlands and other sensitive habitats. Where the wooded area runs alongside the stream bounding the property, this is identified as a feature that will require crossing by Horizontal Directional Drilling (HDD) rather than by open trenching during cable construction. This is designated



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				crossing 'HV_SP8566_001' in the Crossing Schedule [APP-562] .
SPa-005	Transport and Access	Adequacy of access road	The planned access point is also potential safety issue. As the access gate is on such a tight blind bend, HGV and work vehicles would cause major disruption to a small rural road.	The access from Wilby Road is proposed for longer term maintenance when accessed directly from Wilby Road. During the construction phase, the access points CR8 and CR9 will be used for vehicles to cross Wilby Road between fields to the north and the south of the road. Construction vehicles are not proposed to use Wilby Road to access the Site directly.
SPa-006	Other Environmental Matters	Impact on OHLs	There is also the issue of the pylons. There are four pylons on my land. The planned cables will run very close to two of them which is a potential safety and electrical concern. I hope you will take these various concerns into consideration. Thank you	The Applicant notes the concern regarding OHL's and refers to the ES Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A], where the Applicant has undertaken a five stage site selection process. The Cable Route Corridor is sufficiently offset from the OHLs to ensure safe working conditions and no impact to the National Grid's operations. The Applicant has sought to address all matters with National Grid Electricity Transmission Plc through the Applicant's responses to 'NGET-001 to NGET-008' and through a Statement of Common Ground (due to be submitted at Deadline 2).

**6.17 Sharon Fenn****Table 6.127: [RR-1065](#)**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SFe-001	General Matters	Scheme location	I am deeply concerned about the proposed plans for an enormous solar farm that will completely surround our beautiful hamlet (Easton Maudit)	Please refer to the Applicant's response to 'SGHS-004'.



6.18 Cellnex UK (On Tower UK 1 Limited)

Table 6.138: [RR-1217](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CUK-001	Compulsory Acquisition Other Environmental Matters Transport and Access	Telecoms access	Cellnex UK operate a telecommunications site at NGR: 485268 266440. The information provided appears to show the solar project will not occupy land our site is currently in situ, however we would like to be kept updated as an interested party because the works may have an impact on access to our site. Our sites routinely need accessing for maintenance.	The Applicant notes this comment. Wilby Road is only to be closed if open trenching is required for the Cable Route Corridor. In this instance, any closures would be temporary and as short as feasible, with sufficient notice, signage and diversions put in place to ensure access to properties on Wilby Road is not significantly affected. This is secured through the OCTMP Revision A [EX1/GH7.9_A] which is secured through Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Part 2 of Schedule 15 to the draft DCO also provides protective provisions for the operators of electronic communications code networks.



6.19 Cooperb Motorcycles

Table 6.19: [RR-1220](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CoM-001	Socio-economics, Tourism and Recreation Transport and Access	Access for business	Access to my retail business will become restricted during and after construction. The mud all over the road will also be damaging for my business as we retail motorcycles. The bikes we sell are pristine and our customers pride and joy. They simply won't ride them over muddy roads so we will definitely loose business.	Access to businesses at Lower Farm is to be kept open at all stages of the Scheme's lifetime unless there are practical and necessary reasons to temporarily restrict access (likely to be limited to cable construction under the access road, or during AIL movements to the 132kV substation at Green Hill F). These will be distinct events during construction, with prior notice given to business owners at Lower Farm to warn of upcoming closures. During construction, the access will not otherwise be restricted. Access safety is to be secured through onsite banksmen being in place to guide HGV movements entering and egressing the Site. Wheel washing facilities will also be put in place to reduce mud and dust from the Site being tracked onto the access and Easton Lane. These measures are secured in the OCTMP Revision A [EX1/GH7.9_A], which is secured by Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Following construction, the access would solely be used for maintenance traffic to access the solar PV arrays and the substation. With these considerations and mitigation measures secured, the effect on individual



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				business at Lower Farm has not been assessed, as it was considered that the effects on business accessibility, functionality, or likely economic performance were not likely to be significant.



6.20 Trinity Land Ltd.

Table 6.140: [RR-1254](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
TL-001	Landscape and Visual Impact	Impact on views and amenity	Two 2 DIY equestrian sites: 1 - [REDACTED] 2 - [REDACTED] • Views totally ruined from family home and horse livery yard overlooking Eastern Maudit from [REDACTED] • Desirable and peaceful current scenic views will be destroyed.	ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] includes an assessment of the impacts of the scheme on views from individual residential properties, groups of properties and settlements. Please refer to ES Appendix 8.3: LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A] for details on Visual Assessment. ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] recognises the shift from open agricultural farmland to large scale solar infrastructure stating that the character of the Sites themselves and their immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme leading to Significant adverse effects on local landscape character. However, this needs to be considered against the ability of the receiving landscape to accommodate the low lying infrastructure. Within the study area there would be limited appreciation of the array or associated infrastructure, with the integrity of the character of the wider receiving landscape preserved, along with all landscape features within retained and enhanced. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
TL-002	Socio-economics, Tourism and Recreation	Impact on equestrian facilities	• Around 100 horses stabled/turned out in fields boarding Easton Maudit • Clients choose Villa Farm and Top Lodge for peace, countryside location, quiet scenic bridleways, quiet roads and private riding field tracks, which border Easton Maudit. • Permissive riding from Villa farm/top large will be directly next to and overlooking solar development. Greenhill solar has not taken into account any of the permissive riding routes and how these will be affected by the development, both during construction and when the site is operational.	Top Lodge Farm and Villa Farm have been assessed as private equestrian facilities in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] due to their recreational function. Villa Farm was erroneously excluded from the original application submission documents but has been assessed following receipt of RR-1254 and submitted as an update for Deadline 1. The assessment identifies no greater than a minor effect (not a significant effect) to either facility due to views of the Scheme and impacts on hacking routes during construction and operation. This is due to the design of the Scheme at Green Hill F including significant areas where panelled areas have been removed from the Scheme (fields FF6-9, FF13 and FF14) which create significant offsets and breaks in the extent to which the Scheme is visible from these receptors. Permissive riding routes outside the Order Limits are not known to the Applicant and therefore have not been assessed, however it is assumed that these will also benefit from reduced impacts due to the areas removed from the solar array areas in Green Hill F.
TL-003	Transport and Access	Construction and highway user impacts	Two years of construction and disruption.	An assessment of construction traffic and the associated effects is provided in ES Chapter 13 Transport and Access [APP-050] . The



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			HGVs and excess traffic puts riders and horses at significant risk.	sensitivity of routes within the assessment considers proximity to bridleways and identified liveries. The associated effects are provided in ES Chapter 13 Transport and Access [APP-050]. The OCTMP Revision A [EX1/GH7.9_A] contains measures to manage construction traffic including appropriate routes and vehicle travelling at particular times. During construction, the routing of PRowS within the Order Limits are to be protected and will be kept open wherever feasible and safe to do so. Any closures or diversions, such as for cable laying and landscape planting will be temporary in nature, with sufficient prior notice given of closures, and diversion routes clearly signposted. These measures are set out in the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
TL-004	Glint and Glare	Impact to equestrians	Glint and glare from panels affects horses and riders.	The assessment considered receptors along Public Rights of Way (PRow) and horse facilities. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors. As outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.4.21, the sensitivity of PRow and horse facilities have been categorised as 'low', and the maximum



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				magnitude of impact for PRoW and horse facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. The Applicant also notes that the British Horse Society Advice for Access and Rights of Way (August 2025) confirms that the Society "has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses", and that reports "indicate no reflection and no reaction from or impact on horse or rider".
TL-005	Socio-Economics, Tourism and Recreation Transport and Access	Transport and hacking access	• Construction will be 5 1/2 days a week, seriously impact and livery clients opportunity to ride • The construction and compound proposed along the Yardley Hastings road, and the access tracks carrying construction traffic and HGV that will cross that road will significantly impact on horse riders as it is the main route to access bridle and riding areas.	Construction working hours have been set to reduce construction time onsite whilst also protecting residential amenity during evenings and nights. The crossing point on Yardley Road for the use for cable route construction traffic is to be controlled by temporary traffic measures (such as stop/go boards) or banksmen to ensure HGVs are held back from crossing when non-vehicular traffic is present. These measures are secured in the OCTMP Revision A [EX1/GH7.9_A], which is secured by Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
TL-006	Alternatives and Design Evolution	Cable Routing	• The cable route passing through fields at the bottom of station Road will mean disturbance to grazing land and lots of hedging and trees.	The applicant has undertaken a 5-Stage Site Selection Process and has widened the search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area; please refer to ES Appendix 5.1: Site



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Selection Assessment Revision A [EX1/GH6.3.5.1_A] in compliance with National Policy Statement for renewable energy infrastructure (EN-3). The applicant has also assessed impacts to all trees and summarised in supporting documentation: ES Appendix 19.2: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]. Work associated with the cable route corridor will be temporary. The OSMP [APP-550] sets out the details on how the land will be restored.



7 The Applicant's Responses to Relevant Representations by Theme

7.1 Agriculture and Soils

Table 7.1: Agriculture and Soils

Reference	Issue	Comments/Issue Raised	Applicants Response
AGR-001	Cumulative effect	Comments referred to the cumulative effect of the solar farm; arguing that its large scale would intensify environmental and agricultural harm; and questioned whether the land could ever be returned to viable farming use.	Whilst the Scheme results in a temporary loss of productive farmland, the land may still be in agricultural use as grassland for grazing, contributing to food production. The land will be reinstated and returned to the landowners for full agricultural use after the Scheme has been decommissioned. In addition, cessation of cultivation and conversion of land currently under arable use to grassland will be a long-term fallow and will remove disturbance on the soils and may result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term. The Applicant confirms that the measures set out in ODS Revision A [EX1/GH7.3_A] together with OSMP [APP-550] (as secured by Requirements 21 and 19 of Schedule 2 to Draft DCO Revision A [EX1/GH3.1_A] respectively) require agricultural land to be restored to the standard of the existing baseline ALC Grade.
AGR-002	Food security	Comments raised strong concerns about the impact of the solar farm on long term food security. Comments referred to the impact on food production; and the knock-on impacts of a reduction in biodiversity. Comments stated that replacing productive agricultural land with solar infrastructure would	The 1200 ha land for the Proposed Solar Sites only represents 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares of arable land in the UK. Therefore, it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under



Reference	Issue	Comments/Issue Raised	Applicants Response
		undermine the UK's ability to produce food sustainably. Comments highlighted that farmland currently used for food production would be disrupted during both the construction and maintenance phases. Comments raised concern that the loss of agricultural land could lead to increased CO₂ emissions due to the need to import food. Comments suggested that solar panels should instead be installed on buildings or other non-agricultural land not used for food production. Comments noted that importing food to compensate for the loss of local farmland could significantly increase costs and further weaken national food security. Comments argued there is no justification for the compulsory purchase of land that is actively used for growing food. Comments referred to concerns regarding the carbon efficiency; following the import of food. The concerns cited the loss of agricultural land as the reason for increasing imports.	arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200 ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security. UK Food Security Report 2024 indicates that the 6 million hectares of the croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%. Section 9 of the Farming Report [APP-571] looks at the wider economic and food production implications. ES Chapter 7 Climate Change [APP-044] contains a lifecycle assessment covering construction, operation, and decommissioning phases. The Applicant addresses brownfield and rooftop developments in Section 7.3 of the Statement of Need [APP-556], in particular the constraints and limitations of rooftop solar and the benefits of transmission connected solar. Rooftop solar energy cannot be considered as a reasonable alternative to the Scheme because rooftop solar alone will not be able to meet the scale and pace required of new capacity growth to meet the UK's needs. Therefore utility-scale ground mounted solar schemes are also needed.
AGR-003	Loss of farmland	Comments referred to the loss of high-grade agricultural land (Grades 1–3a); which they argued should be preserved.	The Applicant has undertaken a 5-Stage Site Selection Process with a widening search to consider land within a 20km search area Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] in



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to concerns about the reduction in the availability of arable land overall. Comments referred to objections over using high-quality arable land for industrial-scale infrastructure. Comments referred to the importance of protecting the countryside; supporting crop development; and preserving arable land rather than building over it. Comments referred to the current farmland being home to wildlife and natural habitats that would be adversely affected. Comments referred to the negative effects on local ecosystems caused by the removal of farmland. Comments referred to the view that agricultural land should not be destroyed in the pursuit of reducing carbon emissions.	compliance with National Policy Statement for renewable energy infrastructure (EN-3). The Scheme results in partial and temporary loss of productive farmland; the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. Please refer to the Applicant's response to 'ECO-005'.
AGR-004	Soil health and quality	Comments referred to soil analysis showing that over 75% of Site A consists of Best and Most Versatile (BMV) land; with 34% graded as Grade 1 or 2; and noted that Site A2 in Walgrave also contains over 75% BMV land; mostly Grade 3a. Comments referred to concerns that; once decommissioned; the site would be left in poor condition and unsuitable for future agricultural use.	The Applicant has undertaken a 5-Stage Site Selection Process with a widening search to consider land within a 20km search area Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] in compliance with National Policy Statement for renewable energy infrastructure (EN-3). 20km is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection based on commercial feasibility and the efficiency of the transmission of electricity to the grid. The search outcome indicated that the majority of the land within the 20km search area is Grades 3 or 2 land with



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to concerns about soil degradation; including loss of nutrients; soil compaction during construction; reduced organic input; and natural deterioration. Comments referred to the impact of solar panels on soil health; including concerns that water runoff from panels may leach nutrients from the soil. Comments referred to potential pollution of water tables and soil contamination due to buried waste. Comments referred to the absence of enforceable mechanisms to ensure proper soil restoration during decommissioning. Comments referred to possible soil contamination from construction and operational activities.	high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results of the Scheme. See response to AGR-001 above in regard to decommissioning and site condition. Embedded mitigation is secured through the OCEMP Revision A [EX1/GH7.1_A], OOEMP Revision A [EX1/GH7.2_A], and ODS Revision A [EX1/GH7.3_A] and the OSMP [APP-550], which require soil protection, reinstatement and appropriate construction methods to ensure soil management throughout the Scheme's lifetime. ES Chapter 22 Ground Conditions and Contamination Chapter Revision A [EX1/GH6.2.22_A] has included a full assessment and provided mitigation measures specific for potential spillages and leakages of fuels and chemicals, and for any leaching from faulty batteries (including fire damage, ash deposition and extinguishing waters). A 'Discovery Strategy' protocol will also be implemented to focus on the potential to encounter suspected landfill materials when constructing the Scheme, ensuring that any contamination is dealt with appropriately. Assessment has been considered across the construction, operation and decommission phases of the scheme. No significant adverse effects have been assessed as likely.
AGR-005	Topsoil	Comments referred to the removal of topsoil and its associated impacts.	The disturbance of the land and soils during construction is temporary and minimal and the construction activities will be in compliance with the OCEMP Revision A [EX1/GH7.1_A] together with OSMP [APP-550] and ODS Revision A [EX1/GH7.3_A] (as secured by Requirements



Reference	Issue	Comments/Issue Raised	Applicants Response
			13, 19 and 21 of Schedule 2 to Draft DCO Revision A [EX1/GH3.1_A] respectively) in the final soil management plan to protect soil resources and land during construction and decommissioning. Once construction is complete, the soils and land of the disturbed areas will be restored to their previous functionality and use conditions, and the land will be under grassland with potential grazing. The conversion of arable land to grassland would be a long-term fallow and will remove disturbance on the soils and may result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term.



7.2 Air Quality

Table 7.2: Air Quality

Reference	Issue	Comments/Issue Raised	Applicants Response
AIR-001	Dust and air pollutants	Comments raised concerns about air pollution caused by diesel-powered vehicles operating during construction. Comments expressed doubt that any construction management plan would be sufficient to mitigate the impact on air quality. Comments raised about the impact of dust generated during construction on overall air quality.	Temporary air quality effects due to construction vehicle, dust and Non-Road Mobile Machinery (NRMM) emissions during the construction phase have been assessed in accordance with best practice guidance as outlined in ES Chapter 16: Air Quality [APP-053]. Construction vehicle numbers would be below the Institute of Air Quality Management and Environmental Protection UK Development Control guidance screening criteria. As such, air quality effects of construction vehicle emissions are considered to be not significant. Due to the temporary and transient nature of NRMM operation, low background concentrations and NRMM control measures, the effect of emissions from construction equipment and plant has been determined as not significant. A dust risk assessment has been carried out in accordance with best practice to determine appropriate mitigation measures, as outlined in ES Appendix 16.1: Construction Dust Methodology and Assessment [APP-166]. With the implementation of these measures, construction dust effects would not be significant. These best practice measures are included in the OCEMP Revision A [EX1/GH7.1_A], secured by Requirement 13 of the Draft DCO Revision A [EX1/GH3.1_A].
AIR-002	Fire response for residents	A comment noted the lack of guidance on fire safety and pollution; aside from the advice to keep windows closed; but opening them would only increase exposure to pollution.	The OBSSMP Revision A [EX1/GH7.7_A] and ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167] outline how a BESS failure event can be prevented and off-site impacts fully mitigated. The modelling report assesses the environmental impact of a BESS thermal runaway incident on sensitive receptors within a



Reference	Issue	Comments/Issue Raised	Applicants Response
			1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road network. The report concludes there are no significant impacts to sensitive receptors within a 1 km radius of BESS areas. The BESS system selected at detailed design will include integrated fire and explosion prevention and protection systems following key industry safety standards i.e. NFPA 855, UL 9540, BS EN IEC 62933-5-2, and based on comprehensive UL 9540A (2025, 5th Edition) testing. The selected BESS, as mandated under NFPA 855 (2026 Revision), will have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate minimum safe equipment spacing distances and performance test active and passive mitigation systems integrated into the BESS design. A BESS system and site-specific Emergency Response Plan (ERP) will be developed at the detailed design stage, based on national and international best practice measures. These measures, including the ERP, are included in the outline BSSMP and the OCEMP Revision A [EX1/GH7.1_A], secured by Requirement 6 and 13 respectively in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Issue	Comments/Issue Raised	Applicants Response
AIR-003	General	A comment expressed concern about air quality.	The Applicant notes this comment and refers to ES Chapter 16: Air Quality [APP-053] which finds no significant residual adverse effects to air quality as a result of the Scheme.
AIR-004	Health	A comment referred to individuals with lung conditions being particularly concerned about the potential impact of air pollution.	ES Chapter 16: Air Quality [APP-053] has considered all phases of the Scheme (construction, operation/maintenance, and decommissioning) in terms of emissions to air for both human and ecological receptors. Effects have been assessed in accordance with best practice guidance and mitigation measures have been proposed where required. There are not predicted to be any breaches of any air quality limits as a result of the Scheme and all effects have been assessed as not significant.



7.3 Alternatives and Design Evolution

Table 7.3: Alternatives and Design Evolution

Reference	Issue	Comments/Issue Raised	Applicants Response
ALT-001	Alternative energy technologies	Comments referred to the use of small modular reactors (SMRs) as a better energy solution, and that nuclear was a better and more efficient alternative. Comments referred to a preference for wind turbines over large-scale solar farms. Comments claimed the solar development is not appropriate as wind turbine is just as effective and takes less land. Comments raised concern about sub-stations. Comments referred to concerns regarding the efficacy of solar panels; when the sun is not shining. Comments referred to questions around the efficacy of renewable energy technologies.	In Chapter 5: Alternatives and Design Evolution [APP-042] of the Environmental Statement, the Applicant provided further details on the alternatives that were considered and the design evolution process for the Scheme. Section 5.7 outlines the alternative generation technologies considered by the Applicant and justification for the use of Solar technology. The Site is deemed unsuitable for nuclear due to its long development and construction lead times with many regulatory approvals and decision along the way. Wind turbines are considered unsuitable due to its low-lying terrain, which could cause significant visual impacts from tall turbines. Additionally, it is considered that nearby homes may experience negative effects such as shadow flicker and noise. Effects associated with the Substations are included within the assessment of each individual Site and assessed in each technical chapter of the Environmental Statement [APP-038 to APP-064]. Substations have been located on the basis of electrical design requirements, with consideration given to visual impact, proximity to residential and business premises, accessibility, public safety, and agricultural land quality. In regard to the efficiency of solar panels, while output is higher in direct sunlight, photovoltaic technology can generate electricity even under diffuse light. Bifacial panel designs can further increase efficacy by generating from diffuse or reflected light from the ground or surroundings. The Scheme will include a BESS which is designed to



Reference	Issue	Comments/Issue Raised	Applicants Response
			provide peak generation and grid balancing services to the electricity grid. It will allow excess electricity generated from the Solar PV Panels to be stored in the batteries and exported to the grid when required. Excess energy from the grid can also be imported to the batteries. The energy storage facility will therefore provide flexibility and enhance grid reliability. The Statement of Need [APP-556] refers to the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that <i>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>. This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in November 2023. With regard to its contribution to UK electricity supply, share of renewable electricity generation in 2024 was 50.4%⁷.
ALT-002	Alternative locations	Comments referred to the possibility of installing solar panels on car parks instead. Comments referred to the availability of warehouses in Northamptonshire as more suitable locations. Comments referred to using new builds for solar panel installations.	The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. Details of the process are set out in Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] of the Environmental Statement. ES Chapter 5: Alternatives and Design Evolution [APP-

⁷ Department for Energy Security and Net Zero (2025). Digest of UK Energy Statistics (DUKES) Chapter 6: renewable sources of energy. Available at www.gov.uk/government/statistics/renewable-sources-of-energy-chapter-6-digest-of-united-kingdom-energy-statistics-dukes



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to placing solar panels on schools as an alternative option. Comments referred to the use of brownfield sites as a suitable alternative locations to BMV. Comment referred solar panels on rooftops would reduce the need for cabling. Comments referred to alternative locations for the solar panels; such as the M1 which has numerous warehouses.	042] of the Environmental Statement, the Applicant provided further details on the alternatives that were considered and the design evolution process for the Scheme. The Applicant addresses brownfield and rooftop developments in Section 7.3 of the Statement of Need [APP-556], in particular the constraints and limitations of rooftop solar and the benefits of transmission connected solar. In summary, a very large number of commercial rooftops would be required to deliver a utility-scale solar farm. This would require multiple land ownerships, and the legal complexities involved in combining multiple sites of this nature would be prohibitive. The government recognises rooftop solar as being clearly desirable, both on residential and commercial premises. However, rooftop solar energy cannot be considered as a reasonable alternative to the Scheme because rooftop solar alone will not be able to meet the scale and pace required of new capacity growth to meet the UK's needs. Therefore utility-scale ground mounted solar schemes are also needed. Roof-mounted solar panels should still be deployed in addition to utility-scale solar farms but should not be deployed instead of them.
ALT-003	Cumulative impact	Comments referred to the cumulative impact of this and other industrial-scale energy developments in the area.	An assessment of cumulative effects of the Scheme with other developments in the area has been undertaken and is summarised in ES Chapter 25 Cumulative Effects and Effects Interactions [APP-062]. Cumulative Development 8 (CD8) is the only renewables scheme located within any of the Study Areas. It is located alongside and to the east of the existing National Grid Substation at Grendon. The LVIA concluded that the Scheme and CD8 in combination



Reference	Issue	Comments/Issue Raised	Applicants Response
			would lead to an intensification of energy infrastructure in this area leading to an appreciation locally of an extension to the existing National Grid substation. Despite the intensification locally, the receiving landscape has the ability to accommodate the Scheme and CD8 without resulting in any overall increase in the Significance of Effects.], based on ES Appendix 25.2: Short List of Committed Developments [APP-189], the content of which was agreed with local authorities. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme and the short list of committed developments. This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice on Cumulative Effects Assessment (September 2024). The mitigation measures set out across the ES therefore account for anticipated cumulative effects. The consideration of effect interactions follows the methodology outlined in ES Chapter 2: EIA Process and Methodology [APP-039]. The LVIA also includes an assessment of the Cumulative Effects of the Scheme, based on the 9 individual areas of land forming the Scheme. This approach considers the Scheme as though it were a number of separate, smaller projects, and includes an assessment of both Combined (in the same view) and Sequential (different developments revealed in succession as a series of sequential views) visibility. The LVIA found that Sequential Effects and Combined Effects are not considered to be any greater than those effects identified within ES Appendix 8.3 LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A].



Reference	Issue	Comments/Issue Raised	Applicants Response
			NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments.
ALT-004	Impact on existing infrastructure	Comment referred to concerns that construction will impact the existing electricity distribution network.	The location of underground and overhead infrastructure has been identified and preliminary offsets as required by easements and operator safety distances have been embedded in the Scheme design.
ALT-005	Objection to current location and design	Comments referred to objections to the current proposed location; requesting that alternative sites be considered instead. Comments referred to the placements of panels; claiming these should be placed away from residential properties. Comments state that panels in Green Hill C and Green Hill E near to Earls Barton and Mears Ashby villages should be removed. Comments referred to the belief that industrial scale projects should not be permitted in rural Northamptonshire. Comments claimed the proposed location of the solar development is not suitable for the Scheme. Comments referred to the future generations and claimed the development was detrimental for future generations. Comments claimed this was the industrialisation of the countryside.	The Applicant has considered residential properties: buffers and offsets have been implemented into the Scheme design, this has included 50m offset from the curtilage of residential properties. ES Chapter 5: Alternatives and Design Evolution [APP-042] explains how an iterative approach to the design of the Scheme was taken, with various changes made in response to consultation feedback as well as environmental constraints identified as part of the assessments forming the Environmental Statement. This includes the removal of panels from a number of fields in order to maintain openness and visual amenity. A summary of the areas where infrastructure is to be avoided is set out in Table 8.9 of ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]. Extensive landscape mitigation and enhancement planting is proposed in order to mitigate the landscape and visual impacts of the Scheme, as described in Section 8.8 of ES Chapter 8: Landscape and Visual Impact Assessment [APP-045] and included in the OLEMP Revision A [EX1/GH7.4_A], secured by Requirement 7 of the Draft DCO Revision A [EX1/GH3.1_A]. The Scheme is classified as a Critical National Priority (CNP) project as defined in NPS EN-1 and therefore benefits from the strongest policy position in national



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments claimed battery storage stations are taking over the countryside. Comments questioned why the Scheme cannot be located in a different; more suitable area. Comments referred to the relevant planning policy and claimed it was 'unfair' to locate the Scheme in Northampton.	planning policy. EN-1 sets out a presumption in favour of energy related development, explaining at paragraph 3.3.63 that: <i>"The urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible"</i> Please refer to ALT-002 in regard to the site selection for the Scheme.
ALT-006	Scale and size	Comments referred to the large scale and size of the proposed project as a major concern. Comments referred to the broader scale of industrial projects already present in the area. Comments referred to the rapid industrialisation of the local environment due to ongoing developments.	ES Chapter 5: Alternatives and Design Evolution [APP-042] and its accompanying Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] explains how the sites for the Scheme were chosen in light of the identified need for large-scale solar. Specifically, it explains the reasons why a site of the size proposed is required to meet the 500MW grid connection offer that the Applicant holds. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of Overarching National Policy Statement for Energy (NPS EN-1).
ALT-007	Scope of cabling works (length)	Comments referred to the cabling as a large project in itself; which would not be balanced by the benefits of solar energy.	The required cable length is determined by the chosen site locations and the designated point of grid connection. High-voltage underground cabling will be used to connect the development to Grendon Substation, enabling the transfer of electricity between the National Grid and the Battery Energy Storage System, while minimising the



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the vast areas not yet specified for cabling and the lack of defined cable routes. Comments referred to general opposition to the length of cabling required. Comments around the cabling corridor not being laid out clearly.	visual impact of the connections. Please refer to ALT-002 for further information on the Applicant's process for selecting the Sites that make up the Scheme. The exact location of the cable circuits within the 50m Cable Route Corridor will be determined at the detailed design stage. For assessment purposes, the placing of the cable anywhere within the Cable Route Corridor (Work No.5) has been considered, including the avoidance of environmentally sensitive locations.
ALT-008	Site selection process	Comments referred to concerns and questions about the applicant's site selection process.	The Site Selection process, outlined in Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]. There is no standard methodology for the selection of sites however, the Scheme site selection has followed a five-stage site selection process, that has sought to identify sites that meet the legislative and policy requirements, whilst recognising the need for the Scheme to be commercially viable. The site selection process has given consideration to the National Policy Statement EN-3, which outlines key influencing factors for site selection and design with a summary of considerations outlined in ES Chapter 5: Alternatives and Design Evolution [APP-042]. The Applicant sets out a full planning policy appraisal in the Planning Statement [APP-559] which includes site selection in Section 6. The Policy Compliance Document [APP-567] provides a comprehensive assessment of how the Scheme accords with relevant national and local planning policy.
ALT-009	Use of agricultural land	Comments questioned the overall objectives of the scheme; suggesting that alternative; more suitable locations exist	Paragraph 6.16.4 of the Planning Statement [APP-559] sets out how National Policy Statement EN-1 makes clear that applicants must provide justification if best and most



Reference	Issue	Comments/Issue Raised	Applicants Response
		and should be considered instead of productive agricultural land. Comments raised concerns about the negative impact the solar farm would have on the countryside. Comments emphasised the importance of working with the land sustainably; rather than exploiting it for infrastructure development. Comments strongly opposed the use of green belt farmland for development; arguing it should be preserved for agriculture and environmental purposes. Comments referred to the potential negative impact of the project on the green belt. Comments noted that the area has already experienced significant development and should not face further pressure. Comments raised concern about the proposed development affecting Mears Ashby; which is under conservation status; and therefore should be protected from such schemes. Comments expressed concern about the loss of scenic views and visual amenity if greenfield land is used for development.	versatile agricultural land is proposed within a scheme (see paragraph 5.11.34 of NPS EN-1). This justification has been provided by the Applicant in ES Chapter 5: Alternatives and Design Evolution [APP-042] and ES Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]. At paragraphs 2.10.30 and 2.10.31 of EN-3 (November 2023), it is clarified that whilst the development of ground mounted solar arrays is not prohibited on sites of agricultural land classified 1, 2 and 3a, or designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered. It is recognised that at this scale, it is likely that applicants' developments may use some agricultural land. However, applicants should explain their choice of sites, noting the preference for development to be on brownfield and non-agricultural land. The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification. The Scheme is not located within an area designated as Green Belt. Please refer to the Applicant's response to ALT-005 in relation to visual amenity, and CUL-003 in relation to heritage assets including the Mears Ashby conservation area.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the industrial scale of the project and argued that such a development should not be located on green belt land. Comments referred to questioning the need for a large-scale solar farm when alternative locations such as rooftops of housing and commercial properties could be utilised instead of using agricultural land.	



7.4 Arboriculture

Table 7.4: Arboriculture

Reference	Issue	Comments/Issue Raised	Applicants Response
ARB-001	Impacts from cable installation	A comment expressed concern about the removal of hedges and trees to allow for cabling installation.	ES Figures 19.2.1 to 19.2.30 Tree Impact Plans [APP-501 to APP-530] demonstrate the proposed removal of some veteran trees throughout the scheme. The Applicant has made commitments to protect ancient and veteran trees specifically in the ES Chapter 27 Commitments Register [APP-064], these commitments include: • EN010170 – ARB – 03; • EN010170 – ARB – 04; • EN010170 – ARB – 10; • EN010170 – ARB – 21; and • EN010170 – ARB – 22. The above commitments work alongside a package of tree protection measures detailed in ES Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]. In addition, new tree and woodland planting is proposed across the Sites. 10.46ha of native woodland copse/shelter belt (scrub and tree planting) as well as 1.37ha of Native Tree and Scrub Planting – Instant Screening are proposed in OLEMP Revision A [EX1/GH7.4_A]. This is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



7.5 Climate Change

Table 7.5: Climate Change

Reference	Issue	Comments/Issue Raised	Applicants Response
CLI-001	Climate resilience	Comments referred to concerns about climate change; particularly in relation to flooding and drainage systems.	The Applicant notes the comments. Hydrological effects have been assessed in ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A] , the FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes. The flood risk assessment considers climate change scenarios, particularly in relation to increased rainfall. The assessments confirm that surface water runoff from the Scheme will be managed through sustainable drainage measures with attenuation and exceedance routing provided within the Order Limits.
CLI-002	Embodied carbon	Comments referred to concerns about the emissions related to the sourcing and transportation of solar panels; as well as emissions generated by the workforce. Comments referred to doubts about the carbon cost-efficiency of the project; questioning when the energy and fuel used in panel production and transport offset the carbon objectives. Comments referred to concerns about emissions produced both before and during the installation of the solar farm. Comments referred to concerns regarding the need of energy required to manufacture the solar panels; hardware and cables.	The Applicant is aware that the production of solar panels and their transport are the largest contributing factor of the Scheme towards greenhouse gas emissions, as highlighted in ES Chapter 7: Climate Change [APP-044]. These are therefore included in the assessment of GHG emissions from the Scheme. The climate change assessment considers the impact on the climate of Greenhouse Gas emissions arising from the Scheme over its lifetime. The Statement of Need [APP-556] provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050.



Reference	Issue	Comments/Issue Raised	Applicants Response
CLI-003	Global warming and general environmental impacts	Comments referred to the environmental impact of the solar farm as a whole. Comments referred to the environmental implications of the packaging used for solar panels. Comments referred to the belief that the solar farm would have a broadly detrimental environmental effect. Comments referred to the Scheme changing the countryside's 'natural' environment. Comments referred to the concern that solar panels could create an urban heat island effect and contribute to global warming. Comments referred to the belief that the project may not effectively address global warming and may instead cause greater harm to the land. Comments referred to the view that building on prime agricultural land is an inappropriate solution for tackling climate change.	ES Chapter 7: Climate Change [APP-044] considers the impact of Greenhouse Gas emissions arising from the Scheme on the climate over its lifetime. Under Section 7.8 of ES Chapter 7: Climate Change [APP-044], waste (including packaging) is assessed. The Environmental Statement [APP-038 to APP-064] has assessed the Scheme's impacts on the environment. Within each chapter the Applicant provides an overview of how the mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives. ES Chapter 27: Commitments Register [APP-064] sets out the environmental mitigation measures which are proposed to be adopted during the construction, operation and maintenance, and decommissioning phases of the Scheme. The Scheme results in temporary loss of productive farmland, the land may still be in agricultural use as grassland for grazing, please refer to the Applicant's responses with references 'ALT-002' and 'AGR-004' for site selection and use of agricultural land. Heat island effects from large-scale solar installations have been researched to a small extent, and different studies found differing results. These variations come as a result of types of arrays, groundcover associated with the arrays, and seasonal variation. Generally, it can be anticipated that there are some ambient heat gains as a result of the panels absorbing a greater proportion of sunlight than planted and cropped ground. Increased grass-cover however is anticipated to improve cooling from evapotranspiration compared to bare ground or similar to arable fields. Shading from the panels is also likely to moderate diurnal



Reference	Issue	Comments/Issue Raised	Applicants Response
			temperatures immediately beneath the panels. Ultimately, these effects are highly localised and will not contribute to global warming, especially in consideration of the significant GHG reductions from electricity production that the Scheme is expected to provide, which have a far more substantial effect in reducing global warming.



7.6 Community Benefits

Table 7.6: Community Benefits

Reference	Issue	Comments/Issue Raised	Applicants Response
CBF-001	Benefit equity	Comments referred to the point that energy generated by the solar farm would not benefit local communities. Comments questioned whether local people would benefit at all from the disruption to the countryside. Comments question whether the installation of the solar farm is in the best interests of the local community. Comments referred to concerns over why Northamptonshire should bear the impact of a solar farm that primarily benefits other parts of the country. Comments referred to the imbalance between local costs and national benefits, with communities feeling they bear the burden without seeing advantages. Comments referred to doubts about community benefits, questioning whether promised improvements will be delivered or meaningful.	The Scheme will provide a direct public benefit with regard to renewable energy production, landscaping enhancements, ecology and biodiversity enhancements, improvements to PRoW network connectivity, and economic benefits to communities. These are described throughout the Environmental Statement [APP-038 to APP-064] and secured through the relevant mitigation and management plans secured by requirement in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Community Benefit Fund sits separately to the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations. Please refer to the Applicant's response to reference SBMP-007 for further information.
CBF-002	CBF security	Comments referred to the lack of binding commitments to community benefits as part of the proposal.	The Community Benefit Fund sits separately to the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to a lack of information about the proposed community fund. Comments referred to the need for formal community benefit agreements to ensure that value is shared locally.	ongoing basis if the Scheme is approved and the fund begins operations. Please refer to the Applicant's response to reference SBMP-007 for further information.
CBF-003	Compensation	Comments questioned whether any compensation is being considered to be paid to residents who will be affected by the Scheme.	As is the case for all nationally significant infrastructure projects that include compulsory acquisition powers, where persons are directly affected by the Scheme, such as through the compulsory acquisition of rights over their land or where physical factors (such as noise) during operation of the Scheme result in a diminution in value of a residential property, compensation may be payable in accordance with the legislation relating to compulsory acquisition and the compensation code. More widely, the Applicant will be providing a Community Benefit Fund for important causes in the local area. The Community Benefit Fund will be distributed based on feedback, and will be available to support community initiatives. Please also refer to the Applicant's responses to CBF-001 and CBF-002.
CBF-004	Energy bills	Comments referred to concerns regarding the lack of direct benefits to local residents; such as reduced electricity bills. Comments referred to the lack of reduction in local energy bills; while energy companies stand to make significant profits.	Please refer to CBF-001.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments questioned if electricity prices will increase to recover the cost of installing the Scheme.	



7.7 Compulsory Acquisition

Table 7.7: Compulsory Acquisition

Reference	Issue	Comments/Issue Raised	Applicants Response
CAC-001	Objection to use of CA powers	Comment referred to compulsory land purchases being carried out to accommodate the installation of cable ducts. Comments stated compulsory purchase of land is dubious and disgusting.	The Applicant is seeking to enter into voluntary agreements with landowners for the land and rights required for the Scheme. As such, Option Agreements have been entered into with the landowners to lease the land required for the solar panels. Taking a lease means that the freehold ownership remains with the landowner. At the end of the operational life of the Scheme, the solar panels will be removed, the land will be restored and the lease will end. The landowner will then be able to use the land for agricultural purposes. Voluntary agreements for cable route easements are being negotiated. However, as is typical for NSIP projects, it is necessary for the Applicant to seek compulsory acquisition powers in the DCO so as to protect against a scenario whereby contracts are not adhered to or are otherwise set aside, for example: (i) freeholder owners of the land (where agreement has been reached) do not grant a lease of the land in accordance with the terms of the completed option agreements; or (ii) the contracting party dies, is subject to divorce proceedings, or is declared insolvent. In those circumstances, it would be in the public interest for the Scheme to proceed and the interests in question effectively converted into a claim for compensation. The Applicant also needs powers to suspend rights and override easements and other rights in the land to the extent that they would conflict with the Scheme.



7.8 Consent Order

Table 7.8: Consent Order

Reference	Issue	Comments/Issue Raised	Applicants Response
DCO-001	Additional development	Comments referred to the anticipation that the Scheme may grow in the future.	The Applicant has applied for development consent to build the Scheme. If granted, the Development Consent Order would only authorise the Scheme within the defined parameters and boundaries of the Scheme that have been assessed within the Environmental Statement [APP-037 to APP-544] , and in the areas shown on the Works Plans [EX1/GH2.4_B] . Any future expansion to the Scheme would require either a new planning application or a material change application to the DCO. The process for making a material change to a DCO is closely modelled on the procedure for the original application as it is recognised that the impact of a material change could be as significant as the impact of the original application.
DCO-002	Community involvement in DCO process	Comments referred to the size and complexity of the Development Consent Order (DCO) application; stating that a significantly more robust and extended consultation process should have been provided; as fully addressing the planning aspects of the documentation would require several months. Comments referred to the large scale of the DCO and raised concerns about the adequacy of community input within the process.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. The Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Section 4 of Consultation Report Revision A [EX1/GH5.1_A] describes the Applicant's approach to non-statutory consultation, including early engagement meetings and Early Engagement Workshops where community groups, local council



Reference	Issue	Comments/Issue Raised	Applicants Response
			and parishes were invited to share their insights on early design ideas. Section 7 and 8 of the Consultation Report Revision A [EX1/GH5.1_A] describe how the Applicant undertook a six-week statutory consultation on the Scheme, during which the Applicant presented the consultees with a Preliminary Environmental Information Report (PEIR). A non-technical summary was published to accompany the PEIR, and a consultation brochure was published to help consultees understand the proposals and the potential significant effects of the Scheme. Before carrying out this statutory consultation, the Applicant consulted with the host local authorities about the strategy for consultation, with the feedback provided being considered and incorporated into the final Statement of Community Consultation [APP-028]. The statutory consultation was carried out in accordance with the SoCC. During the statutory consultation, the Applicant held four in-person exhibition events and three webinars to present the Scheme and directly respond to queries from consultees. Section 10 of the Consultation Report Revision A [EX1/GH5.1_A] describes the significant volume of responses received from Section 42 consultation and Section 47 consultation, including the issues raised and how these were considered by the Applicant.



Reference	Issue	Comments/Issue Raised	Applicants Response
			The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-015] where local authority consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out.
DCO-003	DCO decision making	Comments referred to concern that the Planning Inspectorate's (PINS) assessment may ultimately not be given due consideration by the Secretary of State when making the final decision. Comments referred to the DCO process; claiming the decision bypassing local planning process undermines the authority of local councils.	As a result of the scale of the project, the Scheme is designated as a Nationally Significant Infrastructure Project, and the Application is being made for a Development Consent Order. As such, the Application and decision making processes are legislated for by the Planning Act 2008 (as amended). Section 103 of the Planning Act 2008 states "<i>The Secretary of State has the function of deciding an application for an order granting development consent</i>". The Applicant has a duty to consult the host local authorities (Section 42) and local communities (Section 47) prior to the application for a DCO. Local authorities have a statutory role in the DCO application process. As per Section 60 (2) of the Planning Act 2008, the Secretary of State must give notice in writing to the host local authorities to invite them to submit a local impact report, where an application for an order granting development consent has been accepted. The DCO Requirements as set in Schedule 2 of the Draft



Reference	Issue	Comments/Issue Raised	Applicants Response
			DCO Revision A [EX1/GH3.1_A] will need to be discharge by the relevant Local Planning Authority and is this is akin to the discharge of planning conditions and is dealt with at the local level. Furthermore, the Examining Authority has a duty to ensure that local authorities and interested parties are invited to attend the preliminary examination meeting (Section 88), hearings (Section 91-96), and to make written representations (Section 90) to be considered within the examination of the DCO application. Each Nationally Significant Infrastructure Project goes through a robust examination process that is set out by the Planning Inspectorate and relevant Examining Authority who are allocated on behalf of the Secretary of State. The examination process takes up to six months, with a further three months for a recommendation to be drafted for the Secretary of State to review and a final three months before a decision is granted to allow the Secretary of State to review all documentation required.
DCO-004	DCO process	Comments questioned the meaning of the application being 'accepted', and asked why the nine sites are deemed 'acceptable' as a single project.	The term 'Accepted' does not indicate that the Scheme has been approved. It refers to a formal stage in the Nationally Significant Infrastructure Project Development Consent Order process. At this stage, the Planning Inspectorate reviews the submitted application to ensure it includes all legally required documentation. Acceptance means the application has met these requirements and can proceed to the examination phase.



Reference	Issue	Comments/Issue Raised	Applicants Response
			The Scheme is a single project made up of nine sites and their connecting cable routes. The sites, while distinct, function as a group, and are being applied for under a single Development Consent Order, which will control their development and use together.



7.9 Consultation

Table 7.9: Consultation

Reference	Issue	Comments/Issue Raised	Applicants Response
CON-001	Accessibility	Comments called for a more transparent and meaningful public consultation process. Comments referred to a disregard for local opinion throughout the consultation. Comments referred to the consultation being difficult to access and understand for many community members.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Section 4 of the Consultation Report Revision A [EX1/GH5.1_A] describes the Applicant's approach to non-statutory consultation, including early engagement meetings and early engagement workshops where community groups, local council and parishes were invited to share their insights on early design ideas. The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-015] where consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out. Please also refer to the Applicant's response to SBMP-006 for further information.



Reference	Issue	Comments/Issue Raised	Applicants Response
CON-002	Consultation fatigue	Comments referred to community fatigue, with frustration at repeated infrastructure proposals in the area.	The Applicant notes this comment. The Applicant sought to carry out proportionate consultation on the Scheme and is grateful for the feedback provided by the community in response to its proposals.
CON-003	Inadequate information	Comments referred to a lack of consideration given to alternative locations; and noted that the consultation materials were often inaccessible and overly technical. Comments referred to the consultation materials as being incomplete and released prematurely. Comments referred to project representatives being unable to justify the project's impacts on the countryside or provide key information; such as a response to fire risk. Comments referred to poor communication; noting that only four events were held and there was a lack of follow-up information once the consultation ended. Comments cited the lack of communication to households on the information on registering requirements on PINS website. Comments referred to the scale and long-term implications of the project not being clearly communicated to the public. Comments referred to the lack of accurate and up-to-date information in the developer's documents; making it hard to judge the project's true impact.	Please refer to CON-001. Section 7 and 8 of the Consultation Report Revision A [EX1/GH5.1_A] describes how the Applicant undertook a six-week statutory consultation on the Scheme, during which the Applicant presented the consultees with a PEIR. A non-technical summary was published to accompany the PEIR, and a consultation brochure was published to help consultees understand the proposals and the potential significant effects of the Scheme.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments claimed the image being portrayed of the Scheme was inaccurate and gives little indication of its long term consequences.	
CON-004	Limited consultation	Comments referred to the consultation process as being limited and insufficient. Comments referred to the consultation having limited reach; describing it as tokenistic; with many people unaware of the proposals until very late in the process. Comments referred to community concerns being dismissed or not taken seriously. Comments referred to the lack of evidence of engagement with Sywell Aerodrome. A comment referred to the 'co-design' meetings being misrepresented; stating there was no genuine co-design process involved. Comments referred to inadequate engagement with key stakeholders; including wildlife trusts and Natural England; and stated that the consultation failed to address concerns from conservation organisations and local communities.	Please refer to CON-001.
CON-005	Targeted consultation	Comments referred to the targeted consultation being poorly organised; with repetitive information and vague or unclear maps. Comments referred to concerns over why the consultation was targeted at only certain locations; despite the project potentially affecting all those who travel through the area.	Please refer to CON-001. The Applicant acknowledges this comment but remains confident in the level of targeted consultation undertaken and the information presented. The targeted consultation sought views and feedback on a limited number of minor changes to the proposals that had been presented at statutory consultation,



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the targeted consultation being inadequately explained; with no public meetings held to support wider engagement.	and a proportionate approach to consultation was therefore taken. The Consultation Report Revision A [EX1/GH5.1_A] details how two phases of community consultation were undertaken (statutory and targeted) to share information and invite feedback at different stages of the Scheme development.



7.10 Cultural Heritage

Table 7.10: Cultural Heritage

Reference	Issue	Comments/Issue Raised	Applicants Response
CUL-001	Military air crash sites	Comments raised concern regarding the Scheme's location in two crash sites: Wellington LN536 in 1940 and De Havilland Vampire XD390 in 1957.	No development is proposed within Fields EF9 and EF26 where WW2 crash sites are recorded within Site E. Where archaeological evaluation has been undertaken in surrounding fields, no remains associated with the crash were encountered. The Applicant is confident that there is no potential for impacts to these military crash sites. The Applicant is also confident that there is no potential for impacts to any military crash site relating to the Wellington LN536 as a result of the Scheme, and notes that it is extremely unlikely that the De Havilland Vampire XD390 crash site is located within Site G. The Applicant has contacted the Joint Casualty and Compassionate Centre (JCCC), the body responsible for licencing under the Protection of Military Remains Act 1986, to confirm this position and clarify whether a licence would be required for the proposals, including to place infrastructure in Field GF13.
CUL-002	Archaeology	Comments referred to the presence of unspecified archaeological sites near the proposed Scheme. Comments referred to land adjacent to the Three Shires Way; which was previously used as a bomb practice site. Archaeological surveys in the area have uncovered artefacts from the Roman period.	ES Chapter 12 Cultural Heritage [APP-049], supported by appendices [APP-121 to APP-146 and APP-149] has identified numerous archaeological sites within the Scheme Order Limits and has assessed the potential impact of the Scheme on identified archaeological assets. Geophysical (gradiometer) survey undertaken across Site G identified several concentrations of archaeological features dated to the Iron Age and Roman periods (see [APP-135] and [APP-136]). The geophysical survey recorded a large concentration of magnetic disturbance including several discrete dipolar responses within the study site in the area



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the risk of archaeological sites being obliterated; and stressed the need for their protection. Comments referred to archaeological impacts when digging cabling trenches.	that was used as a USAAF Practice Bombing Range during the Second World War (MK HER reference: MMK8118). These are found across Fields GF7, GF8 and GF11, and radiating out into parts of Fields GF2, GF3, GF5, GF6, GF9, GF11, with lesser concentrations also present in Fields GF4, GF10 and GF12. A Detailed Explosive Ordnance Risk Assessment [EX1/GH6.3.22.1_A] including a site walk over Field GF7 and parts of GF3 and GF11 identified numerous explosive ordnance related items (USAAF bomb component, British Army Mortars and British RAF bomb components), all of which were identified as being free from explosives. The Applicant agrees that archaeological sites should be protected and so where required appropriate mitigation is proposed either in the form of preservation in situ or preservation by record. See Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] for embedded mitigation and Section 12.9 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146]. Where preservation in situ is proposed, ground disturbance that will impact buried archaeological remains as a result of cabling will be avoided.
CUL-003	Heritage and historic character	Comments referred to the solar farm as a threat to the area's rural character and landscape. Comments referred to the potential adverse effects on the community's heritage.	ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-049] for embedded mitigation and Section 12.11 for additional mitigation).



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the importance of protecting heritage assets rather than destroying them. Comments referred to the presence of listed buildings whose character is closely tied to the rural setting. Comments referred to significant heritage sites; such as the Grade II listed Church of St Mary's in nearby Mears Ashby; which would be completely surrounded by solar panels along with other historic locations. Comments referred to the long-term negative impact on built heritage assets. Comments referred to the potential loss of village identity as a result of the development. Comments referred to the countryside as a valued asset that should be protected from industrial encroachment. Comments referred to the contradiction of placing a solar farm next to a village with conservation status; suggesting it undermines the purpose of that designation.	Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120] details assets scoped in for assessment and was used during consultation with Historic England and the local planning authorities. Scoped-in assets are considered to be agreed with both stakeholders. It assessed that a Moderate adverse effect would occur to Mears Ashby Conservation Area as a result of the Scheme (see ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]). While the Scheme has the potential to undermine the general rural character of the Grade II* Listed Church of All Saints in Mears Ashby (NHLE 1040692) in the broadest sense, the Scheme does not impact the assets principal interests or relationships. There is limited intervisibility between the Grade II Listed Church of St Mary (NHLE 1090552) in Grendon and fields within the Scheme do not contribute towards understanding or appreciation of the building. As such, the Scheme will result in no harm to either asset. Embedded mitigation is planned in the form of removal of previously-proposed solar panels and enhanced screening of existing hedgerows and tree belts along approach roads into the Conservation Areas as secured in the OCEMP Revision A [EX1/GH7.1_A]. Proposals include retaining visual corridors between the churches, and along a public right of way with historical associations.
CUL-004	Scope of assessment	Comments referred to the need for further archaeological investigation before any development proceeds.	Please refer to CUL-002.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the current level of archaeological assessment as being insufficient. Comments referred to the need for a thorough investigation due to the significant scale of the proposed development.	
CUL-005	Specific matters	Comments referred to the proximity of the solar farm to a memorial site; raising sensitivity concerns. Comments referred to Grendon being recorded in the Domesday Book; which would be surrounded on three sides by solar infrastructure. Comments referred to record of the Three Shires Way (or Tinnicks Way) in the Domesday Book.	ES Chapter 12 Cultural Heritage [APP-049], supported by appendices [APP-121 to APP-146 and APP-149] has assessed the potential impact of the Scheme on archaeological assets. This includes desk-based research, which considered the origin of a settlement at Grendon see paragraph 5.9.4 of Part 5 of ES Appendix 12.2 Archaeological Desk-Based Assessments [APP-125] and the Three Shires Way see paragraph 5.9.6 of Part 4 of ES Appendix 12.2 Archaeological Desk-Based Assessments [APP-124] The Applicant notes the location of memorial site in Mears Asby, which relates to two military aircraft crash sites are located within Green Hill Site E, in areas where no solar development is proposed. Where required appropriate mitigation is proposed. See Section 12.7 of ES Chapter 12 Cultural Heritage [APP-049] for embedded mitigation and Section 12.9 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146]. All archaeological works have been completed in consultation with the representative to the local planning authority and Historic England.



7.11 Ecology and Biodiversity

Table 7.11: Ecology and Biodiversity

Reference	Issue	Comments/Issue Raised	Applicants Response
ECO-001	Biodiversity net gain	Comments referred to the view that; should the project go ahead; there must be a significant biodiversity net gain to justify its approval. Comments referred to doubts about the project's biodiversity potential; as much of the land will be shaded by panels. Comments referred to scepticism over the claimed biodiversity gains from mitigation planting; expressing doubt that these would outweigh the environmental disruption caused by the development.	Please refer to the Applicant's response to 'WNC-027'.
ECO-002	Birds of prey	Comments referred to specific mentions of red kites and the impact the project will have on them. Comments referred to the impact to birds of prey that hunt by sight, such as red kites, buzzards, owls and peregrine falcons, and how removing a large area from their feeding grounds would lead to a reduction in their numbers.	Both breeding and wintering bird surveys were completed across the Sites; the methods and results are set out in ES Appendix 9.8 Breeding Bird Surveys Revision A [EX1/GH6.3.9.8_A] and ES Appendix 9.9 Wintering Bird Surveys [APP-092] . The likely impact of the Scheme on these species is set out in ES Chapter 9: Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] . With regard to birds of prey specifically, monitoring surveys of active solar arrays conducted by Clarkson & Woods have shown that a range of species readily forage over arrays. Moreover, the Scheme will provide artificial nest boxes to target a number of raptor species and increase nesting opportunities. Measures to avoid disturbance to species such as red kite and peregrine, which are afforded



Reference	Issue	Comments/Issue Raised	Applicants Response
			additional protection from disturbance when nesting under Schedule 1 of the Wildlife & Countryside Act 1981, are laid out in the OEPMS Revision A [EX1/GH7.5_A] .
ECO-003	Cable routing	Comments referred to concerns around the environmental impacts of cables in the ground; including impact to animals grazing on the land. Comments referred to concerns around cabling destroying farmland and habitats.	The proposed development for the cable route only results in a short- to medium-term temporary loss of productive farmland as the land over the cables will be reinstated quickly after the cables are laid. Habitat loss associated with the temporary works within the Cable Route Corridor will be reinstated upon completion of the works. An OSMP [APP-550] has been prepared for soil handling during construction and soil mitigation measures are committed to protect soils during construction and ensure that soils and land are reinstated to previous functionality and quality. The cables will be buried to a sufficient depth, such that grazing animals will not be at risk of contact with the cables. This applies to cables within the Sites and the Cable Route Corridor. Grazing is routinely implemented across solar farms in the UK. The Scheme has committed to the implementation of protective ecological buffer zones around sensitive habitats, including watercourses, which vary in size based on the sensitivity and ecological value of the habitats/features in question. Further information on protective buffers is provided in the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and the OEPMS Revision A [EX1/GH7.5_A].



Reference	Issue	Comments/Issue Raised	Applicants Response
ECO-004	Decommissioning	Comment referred to concerns regarding the impact on wildlife after the Scheme is decommissioned.	An assessment of effects on wildlife and habitats at the point of decommissioning, and following decommissioning activities is set out in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] . This identifies any survey requirements and discusses potential scenarios as a result of changes to ecological conditions during the lifetime of the Scheme.
ECO-005	General concerns about wildlife	Comments referred to the impact of loss of habitats (trees and hedgerows); wildlife; biodiversity and wider ecosystem. Comments referred to the impact on flora and fauna. Some comments around the impact on larger nesting animals. Comments referred to the replacement of open farmland with solar panels; fencing; and access tracks as harmful to local biodiversity. Comments referred to the general concerns of animal habitats Comments referred to concerns that the works will also negatively impact the nesting and habitats of animals such as Deer; Badgers; Foxes and Moles.	An assessment of the likely significant impacts on wildlife and habitats is included in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Further information on protective buffers and other measures taken to avoid impacts on sensitive habitats and protected species can be found in the ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and the OEPMS Revision A [EX1/GH7.5_A]. This includes measures to protect nesting birds, badgers, otters and water voles, and avoid disturbance of protected species. Whilst there is no statutory obligation to deliver a biodiversity net gain for NSIPs, the Scheme has committed to delivering at least a 10% gain, as per Commitment EN010170 – EB– 19 in the ES Chapter 27: Commitments Register Revision A [EX1/GH6.2.27_A]. An assessment of impacts on, and the provision of mitigation for trees is included in ES Chapter 19: Arboriculture [APP-056].



Reference	Issue	Comments/Issue Raised	Applicants Response
ECO-006	Habitat fragmentation	A comment highlighted that removing hedgerows could increase the risk of habitat fragmentation Comments referred to the removal of hedgerows and the associated ecological disruption. Comments referred to fencing and associated infrastructure restricting the movement of animals and disturbing bird nesting and foraging activities.	Hedgerow losses have been avoided and minimised wherever possible through sensitive design, utilising exiting access points wherever possible. Whilst some fragmentation of hedgerow networks will occur, this will be minimal overall. The maximum extent of hedgerow gaps will be 10m wide, and all temporary losses of hedgerow to facilitate installation of the cable route will be reinstated. A significant net gain in the extent of hedgerow will result from the Scheme, with approximately 15.9km of new hedgerow creation and 7.9km of new lines of trees. This is set out in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and ES Appendix 9.13 BNG Assessment Revision A [EX1/GH6.3.9.13_A]. An assessment of the likely significant impacts on wildlife and habitats is included in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. This includes for impacts on ground-nesting birds and foraging activities from onsite infrastructure. Further information on protective buffers and other measures taken to avoid impacts on sensitive habitats and protected species can be found in the E ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and the OEPMS Revision A [EX1/GH7.5_A].
ECO-007	Impacts on pollinators	Comments referred to concerns that bees and other pollinators cannot thrive on areas covered by solar panels.	The majority of the Sites currently comprise large, open arable fields with monoculture cropping regimes, where pesticides may also be used. These habitats are of low general ecological value, as well as low suitability for bees and other pollinators. The reversion of arable land to permanent grassland within the solar arrays, as well



Reference	Issue	Comments/Issue Raised	Applicants Response
			as the other habitat creation and enhancement measures implemented in the design (such as the creation of wildflower meadow outside of the array fencing and in fields set aside for ecological mitigation), is likely to result in a greater extent of higher-value habitat for pollinators such as bees, and other invertebrates. Further information is provided in the Invertebrates assessment in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] , and in the OLEMP Revision A [EX1/GH7.4_A] .
ECO-008	Pollution	Comments raised concerns regarding contamination of watercourses and threatening habitats and extinction of birds like Golden Plover and Lapwing. Comments referred to the installation of cables; removing hedgerows; and erecting a large battery energy storage system (BESS) adjacent to SSSI and Ramsar sites; which will pose serious risks of pollution; and habitat fragmentation.	Surveys were undertaken to determine the presence of breeding and wintering birds within the Sites. Results of these bird surveys are reported in ES Appendix 9.8 Breeding Bird Surveys Revision A [EX1/GH6.3.9.8_A] and ES Appendix 9.9 Wintering Bird Surveys [APP-092], while the likely impact of the Scheme on these species is set out in ES Chapter 9: Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Adverse impacts are predicted for some ground-nesting birds due to displacement, whilst the majority of bird species will benefit from new habitat creation and sensitive management, alongside targeted measures such as nest box installations. Additional wintering bird surveys targeted towards golden plover and lapwing were conducted specifically to inform impacts upon the Upper Nene Valley Gravel Pits SSSI/SPA/Ramsar sites; these mobile species may utilise land outside the SPA for foraging. Surveys identified levels of use of fields within the Scheme by these species, and appropriate mitigation has been provided to secure foraging areas during the Scheme's



Reference	Issue	Comments/Issue Raised	Applicants Response
			operation. Impacts relating to the SPA are discussed in detail in HRA Revision A [EX1/GH7.21_A]. Potential effects on the River Nene and designated ecological sites have also been assessed in the Water Framework Directive Assessment Revision A [EX1/GH7.22_A] and the HRA Revision A [EX1/GH7.21_A], assessing the risks of adverse effects on integrity of the Upper Nene Valley Gravel Pits SSSI/SPA/Ramsar sites, both in isolation and in combination. No adverse effects on integrity are predicted from habitat fragmentation, pollution or disturbance.
ECO-009	Survey quality	Comments referred to the ecological surveys being incomplete; and raised concerns that the project could significantly affect a rich variety of wildlife; particularly within Green Hill G.	At the time of submission, some survey work at Green Hill A.2 and the Cable Route Corridor was incomplete, owing to Green Hill A.2's later addition into the Scheme and access permissions along the Cable Route. These surveys have now been completed, and revised technical reports will be submitted during Examination. However, all survey work at Green Hill Site G was complete for submission. Discrepancies in survey effort relating to wintering birds are discussed in ES Chapter 9: Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and the HRA Revision A [EX1/GH7.21_A]. This is also being discussed with Natural England and other stakeholders, and a precautionary approach has been taken in the delivery of mitigation land for wintering bird species.



7.12 Electromagnetic Fields

Table 7.12: Electromagnetic Fields

Reference	Issue	Comments/Issue Raised	Applicants Response
EMF-001	Associated effects	A comment expressed concern about the presence of EMFs in the environment surrounding the solar panels. A comment raised concerns about noise potentially emitted by EMFs.	Environmental effects from electromagnetic fields are assessed in ES Chapter 21 Electromagnetic Fields [APP-058] and find no significant adverse effects. An additional precautionary assessment of effects to aquatic species is undertaken in ES Chapter 9: Ecology and Biodiversity Revision A [EX1/GH6.2.9_A] and finds low risk of adverse effects on sea trout, which may be significant at the Local level. Noise generated by electrical equipment on the Scheme and electromagnetic fields generated by the Scheme are separate phenomenon and as such are assessed separately. Noise impacts from the Scheme are assessed in ES Chapter 14 Noise and Vibration [APP-051] and find no significant adverse effects during the Scheme's operation.
EMF-002	Health matters	Comment referred to 30 km of underground cabling and associated infrastructure generating electromagnetic fields cited as a hazard to health. Comments were made expressing concern that EMFs; from infrastructure such as pylons and solar panels could cause health issues. Comments referred to studies suggesting that EMFs may have negative health effects; including a potential link to cancer. Comments referred to the electromagnetic radiation; which could potentially reduce the life expectancy of	The Applicant has assessed the likely impact of electromagnetic fields on health from the Scheme as being negligible in ES Chapter 18: Human Health [APP-055], and therefore not a significant effect. The sources of greatest EMFs from the Scheme are the 400 kV substation transformers, and the 400 kV Grid Connection Cable. ICNIPR reference levels of 100 µT (at which potential health effects from EMF should be monitored, but are not expected to manifest) are only anticipated to be exceeded (up to 102.18 µT) where up to four 400 kV cables may be laid in a single trench. In this instance, a minimum 5 m setback distance is implemented between the high-voltage cables and any residential or business property to sufficiently ensure ICNIRP reference levels are not exceeded within those properties. The minimum actual distance is 17 m to the nearest residential property. The recommended public exposure limit of



Reference	Issue	Comments/Issue Raised	Applicants Response
		residents of all ages; and exacerbate existing health conditions. Comments referred to concerns that EMFs may be hazardous affecting nearby residents.	360 μ T is not generated anywhere on or near the Scheme with public access. Therefore, no person would be exposed to EMFs for more than transient movements (such as crossing the cable route on a PRoW or road). There is no evidence that short-term exposure to EMFs at the ICNIPR reference level are harmful to long-term physical health.
EMF-003	Safety concerns	Comment referred to concern regarding electromagnetic fields being produced from the cable route. Comments referred to concern about the potential impact of EMFs on Lavendon Village. Comments questioned the safety of EMFs; particularly in relation to fire risk.	Environmental effects from electromagnetic fields are assessed in ES Chapter 21 Electromagnetic Fields [APP-058] and find no significant adverse effects. EMF strength falls quickly as distance from a source increases (doubling distance roughly quarters EMF strength). Therefore, the separation distance between onsite electrical equipment and nearby properties (of 17m or more for the Cable Route Corridor to the nearest property) is more than sufficient to reduce EMFs to levels substantially below ICNIPR reference levels. The cable route is a more significant source of EMF than the solar array sites, and therefore EMFs from the solar arrays are not considered more than negligible to nearby properties (such as in Lavendon). Fire risks from the Scheme are a separate consideration to EMFs. Impacts from BESS fires on air quality have been assessed in ES Chapter 16: Air Quality [APP-053] . The report concludes there are no significant impacts to sensitive receptors within a 1 km radius of the BESS areas. Specific fire safety measures in relation to BESS are controlled through the Applicant's OBSSMP Revision A [EX1/GH7.7_A] .



7.13 Energy Need and Policy

Table 7.13: Energy Need and Policy

Reference	Issue	Comments/Issue Raised	Applicants Response
ENE-001	Decision making	Comments referred to Ed Miliband giving consent to the Scheme despite advice to the contrary from the Planning Inspectorate. Comments referred to the view that this is not a simple case of clean energy vs. community interests; but rather an example of poor planning where national targets are used to justify a development that could cause significant harm and ignore local planning principles.	Each Nationally Significant Infrastructure Project goes through a robust examination and proportionate process that is set out by the Planning Inspectorate and relevant Examining Authority who are allocated on behalf of the Secretary of State. The examination process takes up to six months, with a further three months for the Examining Authority to draft a recommendation for the Secretary of State to review. The recommendation will recommend that development consent is or is not granted. The Secretary of State has a further three months to make their decision is granted, to allow the Secretary of State to review all documentation required. The Secretary of State is required to make the decision on whether or not to grant development consent for the Scheme in accordance with the applicable National Policy Statements for Energy, EN-1, EN-3 and EN-5. The National Policy Statements set out how the Secretary of State must balance the adverse effects of the Scheme against its benefits and the need for renewable energy generation infrastructure.
ENE-002	Energy Security	Comments highlighted concerns that exporting energy outside the UK would undermine the project's energy security claims.	The Scheme has a connection agreement to connect 500MW to the National Grid Grendon Substation in July 2029. Therefore, if consented, generation from the Scheme will be transmitted to both local consumers and across the country where it is required. This is a key benefit of the Scheme and helps the UK's electricity system operate efficiently, which is a benefit to all



Reference	Issue	Comments/Issue Raised	Applicants Response
			consumers, including local consumers who, through their energy bills, pay for the operational costs of the UK's electricity networks. Interconnectors flow electricity between countries and are used to balance supply and demand. Government is supportive of increased interconnection for the economic and security of supply benefits they can bring. National Policy Statement for Energy (EN-1, paragraph 3.3.32) recognises that interconnection between national borders has an essential role in delivering a secure, low carbon electricity system at low cost.
ENE-003	Grid capacity	Comments referred to concerns regarding whether the National Grid is able to carry the electricity that will be generated. Comments referred to the need for balancing the electricity grid. Comments referred to concerns regarding 'curtailment'; claiming it was disingenuous to suggest the project will reduce fuel bills; when generating companies are paid substantial sums to switch power plants on or off.	The Applicant has a grid connection agreement with NESO, and as the system operator, NESO is under certain obligations to deliver on the grid connection under the agreement in place. NESO also ensures that power demand, or load, and power supply, always remain balanced. The Scheme does include BESS, which supports the operation of the main solar scheme and can also be used to balance supply and demand over short time periods (e.g. milliseconds to days). BESS may import energy at times when demand is lower than supply or export energy when demand is higher. Section 9.4 of the Statement of Need [APP-556] addresses curtailment and concludes that transmission constraints are unlikely to cause curtailment at the Scheme, and during its operational life, the Scheme is unlikely to receive consumer-funded compensatory curtailment payments.
ENE-004	Legislation	Comments referred to the suggestion that legislation should require all new buildings to	National Policy Statement EN-1 states that decentralised and community energy systems, which by



Reference	Issue	Comments/Issue Raised	Applicants Response
		include solar panels; thereby reducing the need for large solar farms on open land.	definition would include rooftop solar installations, could lead to some reduction in demand on the main transmission system, but <i>"the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives."</i> Large-scale solar is needed alongside rooftop solar because without increasing capacities of both types of solar generation, the UK will likely fall short of its solar capacity aims and therefore its climate change targets. The Applicant addresses rooftop developments in Section 7.3 of the Statement of Need [APP-556], in particular the constraints and limitations of rooftop solar and the benefits of transmission connected solar.
ENE-005	Local policy	Comments referred to conflicts with the North Northamptonshire Joint Core Strategy; the former Wellingborough Local Plan; and relevant Neighbourhood Plans. Comments referred to key objections; including harm to landscape and heritage assets; poor integration with the rural setting; and negative impacts on visual amenity and tranquillity.	The Applicant notes this comment and refers to the Policy Compliance Document [APP-567] which sets out how the Scheme accords with relevant national and local planning policy. It should be read in conjunction with the Planning Statement [APP-559], which sets out the legislative and policy background to the Scheme.
ENE-006	National policy	Comments referred to the project being inconsistent with national policy; as it is proposed for arable land rather than brownfield sites; and raised concerns about its environmental consequences. Comments referred to the Planning Inspectorate's ability to consider prerequisites related to nearby warehousing developments.	The Applicant has undertaken a 5-Stage Site Selection Process with a widening search to consider land within a 20km search area as set out in Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A] in compliance with National Policy Statement for renewable energy infrastructure (EN-3). 20km is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection on commercial feasibility and the efficiency of the transmission of electricity to the grid. This sought to avoid the use of



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the National Planning Policy Framework; which states that development should seek to avoid the loss of high-quality agricultural land where possible; favouring lower grade or previously developed land. It was argued that the proposal is contrary to this policy.	BMV land as much as possible. The search outcome indicates that the majority of the land within the 20km search area has a high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results. The Applicant has prepared a OSMP [APP-550] and committed soil mitigation measures to protect the soils and the land during construction, operation and decommissioning stages, and return the land to its previous functionality and use. The proposed development only results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing, contributing to food production. The land will be returned to full agricultural use after the project lifecycle. Please see Farming Report [APP-571] for further information. The land under grassland use would be a long-term fallow and will enhance the quality of the soils and land in long term. The land for the proposed Scheme can serve as a strategic land reserve underpinning national food security.
ENE-007	Need case	Comments referred to the UK's solar energy targets acknowledging the need for 70GW; with only 17GW achieved as of October 2024 and questioned what gap analysis has been undertaken. Comments referred to hopes that the Government can secure the UK's energy independence and meet net zero targets; while requesting scientific evidence that NSIP scale	ES Chapter 7: Climate Change [APP-044] has assessed the impact of the Greenhouse Gas emissions arising from the Scheme on the climate over its lifetime. The assessment considered emissions from embodied carbon associated with products and emissions generated during the construction, operational and decommissioning phases of the scheme. The assessment concluded that the overall emissions would not be significant and would result in a beneficial



Reference	Issue	Comments/Issue Raised	Applicants Response
		solar farms are; in fact; net zero over their full lifecycle. Comments questioned the need for the Scheme. Comments state a smaller Scheme would have better served local and national sustainability objectives. Comments referred to the belief that the Scheme would not support progress toward net zero emissions.	reduction in GHG in a comparative scenario where the development was not constructed. The Statement of Need [APP-556] provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. The government's Clean Power 2030 Action Plan provides a framework for prioritising low carbon generation connections to support 45 to 47GW of solar power being connected to transmission and distribution networks by 2030 and 45 to 69GW by 2035, in support of achieving and sustaining a clean power system to prepare the UK for the rapid growth in power demand expected over the 2030s and 2040s. The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. Details of the process are set out in Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A].
ENE-008	Pressure on land use	Comments referred to the Government's target to build 1.5 million homes; highlighting population growth and the resulting importance of preserving farmland for food production.	The 1200ha land for the proposed Scheme only represents 0.01% of 16.8 million hectares of the utilised agricultural area (UAA) and 0.027% of 4.4 million hectares of arable land in the UK. The UK Food Security Report 2024 indicates that as of July 2024, around 250,000 hectares of land have been entered into SFI options that temporarily restrict food from being



Reference	Issue	Comments/Issue Raised	Applicants Response
			produced on that land. For context, this is the equivalent of around 3% of England's UAA (9 million hectares). Therefore, the 1200ha land for the proposed Scheme is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. In addition, the conversion of arable land to grassland would be a long-term fallow and will remove disturbance on the soils and may result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security. Section 9 of the Farming Report [APP-571] looks at the wider economic, food production and food security implications. The Statement of Need [APP-556] also describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that <i>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>.



7.14 General Matters

Table 7.14: General Matters

Reference	Issue	Comments/Issue Raised	Applicants Response
GEN-001	Future decommissioning risk	Comments referred to concerns around the implications and consequences if the developer goes bankrupt. Comments raised doubts over the certainty of the Scheme over the next 60 years. Mainly; how will stakeholders be assured that IGP will not cease trading or merge with another organisation? There are requests for guarantees that this will not happen. Comments referred to long term uncertainties, including what will happen after decommissioning and whether land will be fully restored.	Please refer to the Applicant's response to 'SBMP-005'.
GEN-002	Maintenance	Comments referred to the disruption caused from maintenance activities; such as the closure of roads and removal of old panels. Comments questioned who would be responsible for the general maintenance of the Scheme.	General operational and maintenance activities on the Scheme are projected to be low, with most vehicle movements being serviced by 4x4s, vans, or light goods vehicles. During peak replacement activities, HGV movements for delivery of new, and removal of old solar and BESS infrastructure will generate fewer movements than during construction, as assessed in ES Chapter 13 Transport and Access [APP-050]. Road closures are not assumed to be required for any operation, maintenance or peak replacement activities. An OOTMP Revision A [EX1/GH7.25_A] has been drafted, which provides a framework for the management of vehicle movements to and from the Site during periods of scheduled replacement



Reference	Issue	Comments/Issue Raised	Applicants Response
			activities to be carried out during the operation phase, to reduce, as far as practicable, impacts of the Scheme on the local highway network. Maintenance of the Scheme will remain the responsibility of the 'undertaker', defined as Green Hill Solar Farm Limited, and its appointed contractor(s) as set out in the OLEMP Revision A [EX1/GH7.4_A] and secured by Requirement 7 in Schedule 2 of the Draft DCO Revision A. [EX1/GH3.1_A].
GEN-003	Objection	Comments referred to the beauty of the existing countryside; claiming it should not be developed. Comments referred to general impact to the local community. Comments referred to their general objections to the Scheme. Comments referred to the loss of countryside as a key environmental concern. Comments referred to objections over the use of land for the project; citing its potential impact on the local environment and ecosystems. Comments referred to the countryside being decimated by the scale and nature of the development. Comments referred to negative effects on the local village environment and surrounding natural areas.	The Applicant notes these comments and refers to the assessment of effects set out in the Environmental Statement [APP-038 to APP-064] and its Non-Technical Summary [APP-543 and APP-544], with specific note given to the relevant mitigation and enhancement measures committed to in ES Chapter 27 Commitments Register Revision A [EX1/GH6.2.27_A]. These are set out in full through the mitigation and management plans secured by requirement in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the risk of pollution events causing environmental harm. Concerns referred to the potential negative impact of the Scheme on the local area.	
GEN-004	Profits from the Scheme	Comments referred to concerns about the allocation and destination of profits. Comments referred to this as a money-making Scheme underpinned by greed from investors who have 'no real connection' to the local area. Comments referred to the lack of understanding of the impact the Scheme would have on locals. Comments referred to the ethics of Macquarie Asset Management and reference that the Scheme will only benefit this company. Comments referred to concerns over trust and transparency, raising doubts about the developer's motives and accountability. Comments referred to the Scheme being done cheaply. Comments referred to the lack of assessment in the costs to install the panels.	The Applicant recognises that local communities want reassurance that the Scheme is being developed responsibly, transparently, and with due consideration of its impact. Impacts on the local area have been extensively researched and the Applicant's resulting understanding of these is discussed and demonstrated at length in this application. Mitigations, appropriate working and operating practices and standards of work are provided for through conditions in the draft DCO; if consent is granted, the Applicant will be legally bound to comply with these measures, ensuring that construction and operation are undertaken to high standards and in a way that minimises disruption to the local community. The Funding Statement [APP-020] demonstrates the Applicant's understanding of costs and ability to secure the funding necessary to deliver the Scheme as consented if the DCO is granted. In relation to the funding and delivery of the Scheme, it is important to clarify that all large-scale energy projects in Great Britain are financed through private investment. This model enables the development of essential low-carbon infrastructure without reliance on public funds. The Applicant is ultimately owned by three investment funds, which are managed by Macquarie Asset Management on behalf of a range of



Reference	Issue	Comments/Issue Raised	Applicants Response
			investors, including a number of UK pension funds. These investors would receive returns through the funds, while Macquarie would receive management fees, as is standard. Further funding may come from commercial lenders, who would receive interest payments. The funding structure is common in the energy sector and ensures that the Scheme is financially robust and deliverable. Private investment goes beyond generating returns for investors; it brings essential capital, expertise, and innovation to UK solar projects, which can help deliver upgrades and new developments faster and more efficiently. The private funding structure also helps ease pressure on public finances, allowing government resources to be channelled elsewhere. Importantly, involving UK pension funds ensures that money is invested back into projects that create jobs, support growth, and enhance services for people across the country. Funding structures like this are designed to build resilient, future-ready infrastructure that benefits everyone.
GEN-005	Support	Comments referred to the general support of the Scheme.	The Applicant notes these comments and welcomes support for the Scheme.



7.15 Glint and Glare

Table 7.15: Glint and Glare

Reference	Issue	Comments/Issue Raised	Applicants Response
GLI-001	Animals	Comments referred to glare impacting the safety of animals; particularly horses.	Please refer to the Applicant's response to 'TL-004'.
GLI-002	General	Comments referred to general objections raised due to the issue of glare.	ES Chapter 15 Glint and Glare [APP-052] has considered the impact upon agricultural workers, amenity at nearby residential dwellings, safety to PRow and local road users, and to aviation safety. No residual significant adverse effects have been found to be likely.
GLI-003	Glint and glare occurrence	Comments referred to glint and glare resulting from direct line of sight to PV panels. Comments referred to solar panels causing glare. Comments referred to requests for tinted panels due to concerns about glare. Comments referred to glare from panels affecting the shade of neighbouring crops.	ES Chapter 15 Glint and Glare [APP-052] has considered the impact upon agricultural workers, amenity at nearby residential dwellings, safety to PRow and local road users, and to aviation safety. No residual significant adverse effects have been found to be likely. Assessment of the likely occurrence of glint and glare to road, residential properties, and aviation receptors, have been set out in full in ES Appendices 15.1 to 15.11 Glint and Glare Receptor Results [APP-155 to APP-165] . Professional judgement was to the modelling results to determine the residual impact magnitude. This includes factors such as predicted cloud cover in the area, the source of the glare relative to the receptor, existing screening obstructing line of sight between the proposed arrays and the receptors, and more. The residual impact magnitude classified towards the modelled receptors was 'low', and a non-significant minor effect was predicted.
GLI-004	Height	Comments referred to the height of glare and questioned what the acceptable height should be.	The average height for glare modelled in ES Appendices 15.1 to 15.11 Glint and Glare Receptor Results [APP-155 to APP-165] is 1.95 m for fixed panels, and 2.45 m for tracking panels. These heights represent the middle of the panels to model an average effect, rather than at the panels' peak height.



Reference	Issue	Comments/Issue Raised	Applicants Response
GLI-005	Residential properties	Comments referred to glare affecting nearby houses and being visible from residential areas.	ES Chapter 15 Glint and Glare [APP-052] has considered the impact upon amenity at nearby residential dwellings in Section 5 to 6 of ES Appendix 15.5: Green Hill G Ground-Based Receptor Results [APP-159] . It concludes that a 'non-significant minor effect' has been classified at all modelled dwellings.
GLI-006	Safety for transport users	Comments referred to glare potentially affecting road safety. Comments referred to glare from panels creating hazardous conditions for pedestrians and cyclists. Comments referred to the proximity of a busy airport and the risk of glare presenting a safety hazard.	The assessment considered receptors on local roads and PRoWs. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors, rather than the amenity. As outlined in ES Chapter 15 Glint and Glare [APP-052], the sensitivity of local roads and PRoWs have been categorised as 'low', and the maximum magnitude of impact for either local roads or PRoWs is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms. ES Chapter 15 Glint and Glare [APP-052] has considered the impact of glint and glare at nearby aviation receptors, including Sywell Aerodrome, in ES Appendix 15.11: Sywell Aerodrome Aviation Receptor Results [APP-165]. It concludes that a 'moderate impact and therefore significant moderate effect' is predicted towards receptors at Sywell Aerodrome from tracking panels in Green Hill C and Green Hill B [APP-052]. The findings of the assessment were shared with an Aviation Specialist to understand additional mitigation options. The Aviation Specialist has provided a review of empirical evidence collected from aerodromes near to existing solar farms in Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes [APP-572]. It was concluded that no additional mitigation measures were required towards aviation receptors.



7.16 Ground Conditions

Table 7.16: Ground Conditions

Reference	Issue	Comments/Issue Raised	Applicants Response
GRO-001	Cleaning materials	Comments referred to contamination from (solar) cleaning.	The Applicant does not intend to use chemicals to clean the panels – only water – as stated in section 2.11 of the OOEMP Revision A [EX1/GH7.2_A] .
GRO-002	Contamination	Comments referred to the leak of chemicals on the land. Comments referred to the potential for pollution of soil and water during the construction phase. Comments referred to impact on the surrounding countryside and risk of pollution.	ES Chapter 22 Ground Conditions and Contamination Chapter Revision A [EX1/GH6.2.22_A] has included a full assessment and provided mitigation measures specific for potential spillages and leakages of fuels and chemicals, and for any leaching from faulty batteries (including fire damage, ash deposition and extinguishing waters). Assessment has been considered across the construction, operation and decommission phases of the scheme. No significant adverse effects have been assessed as likely.
GRO-003	Groundwater	Comment referred to concerns about potential impacts on groundwater	ES Chapter 22 Ground Conditions and Contamination Chapter Revision A [EX1/GH6.2.22_A] has included a full assessment and provided mitigation measures specific for contamination to groundwater from construction, operation and decommissioning works. No significant adverse effects have been assessed as likely.



7.17 Human Health

Table 7.17: Human Health

Reference	Issue	Comments/Issue Raised	Applicants Response
HUM-001	Access to the countryside	Comments referred to the Scheme hindering residents' access to the countryside and schools Comments referred to the compromised access to the countryside / green space will foster a sense of isolation and despair in the community. Comments questioned whether walkers will have access to popular routes during the construction. Commenters questioned how access to the countryside will be upheld when high fencing is proposed. Comments referred to the loss of green spaces; stating this would have a detrimental effect on community wellbeing. Comments referred to the importance of green spaces in maintaining environmental balance and wellbeing.	During construction, the routes of PRoWs within the Order Limits are to be protected and kept open wherever feasible and safe to do so. Any closures or diversions, such as for cable laying and landscape planting will be temporary in nature, with sufficient prior notice given of closures, and diversion routes clearly signposted. These measures are set out in the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Scheme does not truncate or cause long-term diversions to PRoWs, while substantial offsets (minimum 15 m from PRoW centrelines) and some areas of open fields are provided to ensure PRoW users are separated from onsite infrastructure to mitigate against users feeling enclosed when crossing the Sites. These design measures are set out in the OLEMP Revision A [EX1/GH7.4_A] which is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. With respect of likely impacts on health, wellbeing, and lifestyle from changes to access to the countryside, these are assessed in ES Chapter 18: Human Health [APP-055] which find no significant adverse effects to human health and wellbeing.
HUM-002	Glint and glare	Comments referred to concerns about glare affecting people's health	ES Chapter 15 Glint and Glare [APP-052] has considered the impact upon on agricultural workers, amenity at nearby residential dwellings, safety to PRoW and local road users, and to aviation safety. No residual significant adverse effects have been found to be likely.



Reference	Issue	Comments/Issue Raised	Applicants Response
			Health impacts from glint and glare have only been considered in respect of safety, and thus are considered integrally to the assessment of impacts on PRow's and transport within ES Chapter 18: Human Health [APP-055] . No significant adverse effects to health and wellbeing are likely as a result of the Scheme.
HUM-003	Health impacts from fires	Comments referred to the dangers of fumes from potential fires; suggesting these could cause significant health problems for people living nearby especially those with conditions such as asthma.	The assessment of human health effects in ES Chapter 18: Human Health [APP-055] considers the health effects of battery fires and dust on air quality, and the potential risks to persons from airborne pollutants. On the basis that, subject to good practice and mitigation measures, no significant effect is considered likely for air quality, no respective significant effect on human health and wellbeing is anticipated. The OBSSMP Revision A [EX1/GH7.7_A] provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. The purpose of this OBSSMP is to identify how the Applicant will use good industry practice to both prevent and reduce risk to life, property, and the environment from a BESS failure event. ES Appendix 16.2: BESS Fire Emissions Modelling Report [APP-167] considers all sensitive receptors within a 1km radius of the BESS areas and finds that there are no significant fire emission impacts on local residential properties. The OBSSMP Revision A [EX1/GH7.7_A] has been drafted to ensure that there are no significant impacts from a BESS fire to site operatives, first responders, or the local community. This is secured in Schedule 2, Requirement 6 of the Draft DCO Revision A [EX1/GH3.1_A].
HUM-004	Identity and Influence	Comments referred to the loss of sense of place, with anxiety about irreversible	The assessment undertaken in ES Chapter 18: Human Health [APP-055] assesses the impact of the Scheme on physical and mental health and wellbeing within communities.



Reference	Issue	Comments/Issue Raised	Applicants Response
		change to the countryside and local identity. Comments referred to the lack of local influence, feeling that residents' voices are not adequately included in decision making.	In direct consideration of rurality and people's association with where they live is the assessment of '<i>community identity, culture, resilience and influence</i>', which considers how the Scheme impact on community wellbeing, sense of place, and the extent to which residents feel they can shape their physical surroundings. The assessment considers that the Scheme is anticipated to have no greater than a long-term, but temporary, minor adverse effect (during construction and in the 5-10 years that follow) – which is not significant.
HUM-005	Loss of use for leisure and activities	Comments referred to the impact the loss of amenities can have on leisure and activities.	Impacts on leisure and recreational activities are assessed in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. Significant adverse effects are largely able to be mitigated against, with the exception of long-distance recreational routes during the Scheme's construction and decommissioning, due to their level of importance. The resultant likely impacts on health, wellbeing, and lifestyle from changes to access to leisure and play are assessed in ES Chapter 18: Human Health [APP-055] which find no significant adverse effects to human health and wellbeing.
HUM-006	Mental Health and Wellbeing	Comments referred to the impact on mental health; with concerns that environmental changes and increased stress levels could affect the mental wellbeing of residents. Comments referred to impact on health and mental wellbeing due to lack of green spaces. Comments referred to the proximity of the development to residential properties; stating this would negatively affect	The assessment undertaken in ES Chapter 18: Human Health [APP-055] considers a wide range of health determinants that consider the mental and social wellbeing impacts of the Scheme. These include changes to social demography, physical health and wellbeing, social and health infrastructure. In direct consideration of rurality and people's association with where they live is the assessment of '<i>community identity, culture, resilience and influence</i>', which considers how the Scheme impact on community wellbeing, sense of place, and the extent to which residents feel they can shape their



Reference	Issue	Comments/Issue Raised	Applicants Response
		residents' wellbeing and cause distress to homeowners. Comments referred to the proximity of the proposed Scheme to residential areas; including Castle Ashby; raising concerns about the effect on residents' quality of life. Comments referred to the negative impact on the wellbeing of local residents as a result of the project. Comments referred to the idea that the loss of natural landscapes would lower people's quality of life and negatively affect their overall wellbeing.	physical surroundings. The assessment considers that the Scheme is anticipated to have no greater than a long-term, but temporary, minor adverse effect (during construction and in the 5-10 years that follow) – which is not significant. With respect to access to open space for leisure and play, the assessment considers that the Scheme is anticipated to have no greater than a long-term minor adverse effect (during the Scheme's entire lifetime) – which is not significant. The Scheme also provides permissive paths within the Sites to allow greater public access to the countryside and will provide a beneficial impact on PRoW use for local users and visitors through mitigating adverse impacts on other PRoWs and providing alternative access routes to the use of the local highway network. These measures, when implemented, will enhance connectivity in the local area and may help to improve recreation in the immediate vicinity.
HUM-007	Overall public health impacts	Comments referred to general health related objections; with many residents citing risks to public health as a primary concern.	The assessment undertaken in in ES Chapter 18: Human Health [APP-055] assesses the impact of the Scheme on physical and mental health and wellbeing within communities. No significant adverse effects are anticipated at any stage of the Scheme.
HUM-008	Physical Health	Comments referred to the impact on physical health; particularly within an ageing community; raising concerns about reduced access to healthy environments. Comments referred to potential physical health issues; including the risk of illness caused by pollution or other negative effects of the development.	The assessment undertaken in in ES Chapter 18: Human Health [APP-055] considers a wide range of health determinants that consider the physical health and wellbeing impacts of the Scheme. These include changes to housing, open space, leisure and play space, physical environment factors (air quality, water quality, ground contamination, noise and vibration), and social and health infrastructure (such as GP and emergency care facilities). Subject to implementation of mitigation measures, no significant residual adverse effects are anticipated at any



Reference	Issue	Comments/Issue Raised	Applicants Response
			stage of the Scheme. The Scheme furthermore seeks to enhance access to the countryside for physical activity though the provision of permissive paths on most of the Sites, provided with the aim of increasing PROW network connectivity throughout the operational lifetime of the Scheme. These are shown as Work No. 10A and 10B on the Works Plans [EX1/GH2.4_B] , and on ES Figures 4.4.1-4.4.20 Landscape and Ecology Mitigation Plans [APP-207 to APP-219, EX1/GH6.4.4.13.1_A, EX1/GH6.4.4.18_A, and EX1/GH6.4.4.19_A] .



7.18 Hydrology and Flood Risk

Table 7.18: Hydrology and Flood Risk

Reference	Issue	Comments/Issue Raised	Applicants Response
HYD-001	Assessment scope	Comments requested an independent hydrological study must be carried out to assess surface water run-off; cumulative impacts; and downstream flood risk before any planning decision is made. Comments claimed the flood risk assessments did not account for efficient SUDs. Comments referred to the Flood Risk Assessments and claim the assessment have not used accurate data; and failed to account for the high levels of flooding in recent years.	The scope of assessment undertaken with respect to hydrology, flood risk and drainage issues was set out by the Planning Inspectorate in their Scoping Opinion Revision A [EX1/GH6.3.2.2_A] of 30 August 2024. Hydrological modelling has been carried out as part of ES Appendix 10.1 Flood risk Assessment and Drainage Strategy Report Revision A [EX1/GH6.3.10.1_A]. Additional sensitivity testing of the modelling will be provided at Deadline 2 in a Hydraulic Modelling Report [EX2/GH8.2.1]. Surface water runoff from all developed areas, including access tracks, substations and the BESS, will be restricted to greenfield rates with on-site attenuation and exceedance routing contained within the Order Limits. The detailed design of sustainable drainage (SuDS) must be approved by the relevant planning authority under Requirement 11 of the Draft DCO Revision A [EX1/GH3.1_A]. For further information, please refer to the Applicant's responses to 'EA-029' to 'EA-051'.
HYD-002	BESS flooding and emergency events	Comments referred to the impact the BESS; situated in Flood Zone 3; would have on the flood-prone land; causing serious fire and pollution hazards. Comments claim placing the Scheme on flood prone land will increase risk of fire. Comments referred to the lack of a clear emergency response protocol for local services.	The OBSSMP Revision A [EX1/GH7.7_A] comprehensively references and incorporates NFCC guidance within the safety documentation. A detailed Battery Storage Safety Management Plan and Emergency Response Plan is committed to be drafted at detailed design when the BESS design is selected and before construction commences. The OBSSMP Revision A [EX1/GH7.7_A] stipulates all key safety standards and codes, testing requirements, risk assessment reports, consequence modelling reports, and emergency response



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments claimed the proximity of the Scheme to local watercourses and residential properties risks human health.	documentation requirements that the Applicant is committed to fulfilling. This is secured through Requirement 6 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] . The Applicant has carried out hydraulic modelling for the Grendon Brook, River Nene and Field Drain to confirm that the BESS will be located in an area safe from flooding. Please refer to the Applicant's response to HYD-001, EA-018 and EA-019.
HYD-003	Contamination of water	Comments referred to the risk of BESS elements contaminating local water bodies; with some citing it will contaminate the River Nene where it would flow downstream through the county and beyond. Comments claimed the construction work dust; concrete mixing and other processes will pollute neighbouring water bodies. Comments referred to concern about chemical leakages in River Nene; a protected site under RAMSAR and watercourses. Comments referred to the concern of water pollution from the BESS infrastructure. Comments referred to concerns about the risk of pollution to water sources and flood plains.	With respect to BESS, please refer to the Applicant's response to 'EA-003' and 'EA-010'. With respect to groundwater impacts, please refer to the Applicant's response to 'EA-005'. The OBSSMP Revision A [EX1/GH7.7_A] and FRADS Annex J: Green Hill BESS Revision A [EX1/GH6.3.10.11_A] ensure that the BESS is designed to be safe and to contain any potential contamination in the event of a fire. The OCEMP Revision A [EX1/GH7.1_A] includes pollution prevention controls including lined containment for hazardous materials, firewater isolation and removal procedures, and strict requirements for the handling and storage of soils and fuels. These measures are secured by the Requirements in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. With these measures in place, there will be no significant effect on waterbodies.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comment referred to the threat of pollution to waterways that feed into Sywell Reservoir.	
HYD-004	Flood impacts	Comments refer to the growing impact the increased water levels would have on local biodiversity. Comments referred to concerns that the removal of hedges could contribute to increased flooding. Comments referred to concerns about the impact of flooding on animals.	Dependent effects on ecology and biodiversity receptors from flooding have been identified in in ES Chapter 9 Ecology and Biodiversity Revision A [EX1/GH6.2.9_A], and specifically rely on drainage and flood risk mitigation strategies set out in ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A], the FRADS Report Revision A [EX1/GH6.3.10.1_A], and supporting annexes. Surface water runoff from all developed areas, including access tracks, substations and the BESS, will be restricted to greenfield rates with on-site attenuation and exceedance routing contained within the Order Limits, ensuring the Scheme does not increase flood risk elsewhere. No significant adverse effects to ecology and biodiversity receptors as a result of changes to drainage and flood risk from the Scheme have been identified as likely to occur.
HYD-005	Flood risk	Comments referred to the potential for increased flood risk due to the removal of farmland. Concerns referred to the environmental risks; including the potential for increased flooding. Comments referred to the increased risk of damage to properties and reducing property value from the flooding.	Please refer to the Applicant's response to HYD-001, HYD-005, HYD-006, 'EA-018' and 'EA-019'.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the impact the flooding will have on horses and local wildlife and livestock. Comments referred to the investment required to strengthen local infrastructure that will prevent flooding. Comments referred to the impact increased flooding could have on displacing residents and making them homeless. Comments claimed the construction activities will increase the risk of flooding. Comments referred to the impact the flooding will have on hedges and trees. Comments referred to the risk of erosion and run off into nearby waterways; impacting biodiversity.	
HYD-006	Location specific impacts	Comments referred to the impact increased water levels would have on local highways and traffic such as Castle Road; Olney Road and the A428. Comments referred to the historic flooding in Lavendon and are concerned the Scheme will exacerbate this. Comments referred to the risk of flooding in Grendon and Easton Maudit; claiming it will increase flooding in the area.	The Applicant notes the concerns raised regarding flood risk at specific locations. Flood risk has been assessed comprehensively in the ES Appendix 10.1: FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes. These confirm that the majority of the Order Limits are located in Flood Zone 1, with only limited overlaps with Flood Zones 2 and 3, and that all sensitive infrastructure is located outside the modelled design flood extent. Surface water runoff from all developed areas, including access tracks, substations and the BESS, will be restricted to greenfield rates with on-site attenuation and exceedance routing contained within the Order Limits. Research (Cook



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the risk of flooding in areas such as Kempston; Bedford; and Newport Pagnell.	& McEwan, 2013) demonstrates that solar panel arrays themselves do not materially increase runoff, as rainfall continues to infiltrate between and beneath the panels. The principal hydrological risk is soil compaction during construction, which is mitigated through the OCEMP Revision A [EX1/GH7.1_A] and the OSMP [APP-550]. In the long term, the change of use from intensively farmed arable land to managed grassland beneath and between panels will improve soil structure and infiltration. Accordingly, the assessments confirm that the Scheme will not increase flood risk to Castle Road, Olney Road, the A428, Lavendon, Grendon, Easton Maudit, Kempston, Bedford, Newport Pagnell or elsewhere.
HYD-007	Mitigation measures	Comments referred to the mitigation measures proposed to be inadequate.	Please refer to the Applicant's response to 'EA-022'.
HYD-008	Site drainage	Comments refer to the impact the Scheme will have on the drainage; which will cause more flooding in the area. Comments refer to the run-off of water; claiming the Scheme and its infrastructure will disrupt the natural drainage; which will increase the amount of water above the ground. Comments referred to impact removing crop and agricultural activities would have on the drainage of water which will increase the risk of flooding.	Please refer to the Applicant's response to HYD-006, 'AW-013' to 'AW-016'. Flood mitigation measures are set out in the ES Appendix 10.1 FRADS Report Revision A [EX1/GH6.3.10.1_A] and supporting annexes [APP-098 to APP-108] and are secured by Requirement 11 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the impact of inadequate drainage systems; claiming heavy rainfall will lead to flooding. Comment referred to the inadequate drainage system resulting in run-off of water into ditches and then flow into houses and amenities. Comments inferred that rainwater runoff from panels may create erosion channels if not properly managed.	
HYD-009	Water resources	Comments referred to the strain the Scheme would have on existing services such as the local water supply; referring water being pumped upwards to Earls Barton.	Please refer to the Applicant's response to 'AW-009'.



7.19 Landscape and Visual Impact

Table 7.19: Landscape and Visual Impact

Reference	Issue	Comments/Issue Raised	Applicants Response
LAN-001	Associated infrastructure	Comments referred to the associated infrastructure; such as CCTV; security fencing and rows of metal panels disrupting local residential properties and altering the countryside permanently. Comments referred to the visual disruption as a result of the security lighting and glare from the panels.	With respect to changes to residential amenity and public amenity in the countryside, please refer to the Applicant's response to 'SGHS-070'. Details on fencing, lighting and security can be found in ES Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A] and the CDPP Revision A [EX1/GH7.17_A]. These elements are secured by Requirement 5, Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. During the Scheme's operation, no onsite lighting will be used for the solar array areas. With respect to glint and glare, please refer to the Applicant's response to 'GLI-003'.
LAN-002	Change to countryside and character of landscape	Comments referred to the Scheme having a detrimental impact on the overall landscape; due to the scale. Comments referred to the beauty of the English countryside and the belief that it should not be destroyed for industrial-scale developments. Comment referred to this as the 'industrialisation of the countryside'. Comments referred to doubts about the Scheme's consideration of the natural landscape. Comments referred to the size of the Scheme; being comparable to Heathrow Airport. Comments claimed this altered the rural identity of the countryside and cited	Please refer to the Applicant's response to 'SGHS-070'.



Reference	Issue	Comments/Issue Raised	Applicants Response
		the rural feeling in villages such as Earls Barton; Mears Ashby and Lavendon. Comments referred to the loss of the countryside within Walgrave and Old. Concerns were raised about the negative impact on the area's overall character; appearance; and landscape. Comments referred to buildings in the area being part of what is often described as the 'Garden of England;' noting that the existing infrastructure is not suitable for a project of this scale. Comments referred to the project having a detrimental impact on the overall landscape. Comments referred to the beauty of the English countryside and the belief that it should not be destroyed for industrial-scale developments. Comments referred to the loss of open countryside and its negative impact on the rural landscape. Comments referred to the overall scale of the scheme and the disruption it may cause to the rural character of the area.	
LAN-003	Loss of view / visual impact	Comments referred to the visual impact; claiming the Scheme will be an 'eyesore' and a 'blight' on the countryside.	Please refer to the Applicant's response to 'EMPM-002'. ES Chapter 8 Landscape and Visual Impact [APP-045] assesses views of the Scheme from residential properties, transport routes, public rights of way, and key



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to concerns that views of the countryside from footpaths and the roadside will be spoiled. Comments referred to the height of the solar panels; claiming the 4-5m height of the panels will obscure the wide open views of the countryside.	viewpoints to determine the significance of impact of the Scheme on these receptors at construction, after mitigation planting has matured, and during decommissioning. With the exception of three PRowWs, there are no significant residual adverse effects once mitigation planting has matured. The assessment of visual impacts has been undertaken presuming the panels are at their full height (4.5 m from ground level when tilted by 60° - as defined in CDPP Revision A [EX1/GH7.17_A]).
LAN-004	Planting and mitigation	Comments referred to the screening proposed; claiming it will take years for the Scheme to be screened and to mitigate the impact to views. Comments noted that the current planting barriers are inadequate for reducing the visual impact of the project. Comments referred to concerns about visual impact and requested the planting of tall; fast-growing; and established trees. Comments referred pointed out that plants take a long time to grow and will not effectively reduce the visual impact during the construction phase. Comments referred to the Harrold/Podington solar farm as an excellent example of how screening the solar farm can make it unnoticeable.	ES Chapter 8 Landscape and Visual Impact Assessment [APP-045] considers the visual impacts in year 1 to understand the impacts before planting is established, and year 15 once it has grown out, to provide a complete understanding of the effects of the Scheme. Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the OLEMP Revision A [EX1/GH7.4_A]. This includes large areas of groundcover planting, including tussocky grassland to enhance ecology and biodiversity at field boundaries, and substantial woodland and hedgerow planting across the Sites. 10.46ha of native woodland copse/shelter belt (scrub and tree planting) is proposed, in addition to 1.37ha of Native Tree and Scrub Planting to be planted as "instant" mitigation during construction. This is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the A14 roadside; where small saplings died and left a poor visual view.	
LAN-005	Vegetation removal	Comments suggested that the existing infrastructure is not suitable for the proposed scheme and recommended exploring options that do not require the removal of vegetation.	The Scheme has been designed with the aim of retaining as much valuable habitat as possible (including woodlands, hedgerows, species-rich grassland and other habitats) and keeping vegetation removal to a minimum. This is shown in the implementation of protective ecological buffers around the vast majority of valuable habitats within the Order Limits (further information on protective buffers is provided in ES Appendix 9.13 BNG Assessment Revision A [EX1/GH6.3.9.13_A]), as well as in the OEPMS Revision A [EX1/GH7.5_A]. Although some vegetation removal will inevitably be required to facilitate the construction of the Scheme, vegetation removal will be carried out sensitively in accordance with the OEPMS Revision A [EX1/GH7.5_A], and any losses will be fully compensated for. The Biodiversity Net Gain assessment completed for the Scheme takes into account all existing habitats, whether these will be lost, retained or enhanced, as well as any new habitat creation proposed and the effect of changes to management on the Sites' value for biodiversity. The assessment concluded that a significant net gain in the value of habitats, hedgerows and watercourses would be delivered as a result of the Scheme, and therefore that any vegetation removal would be more than fully compensated. Further information is available in ES Appendix 9.13 BNG Assessment Revision A [EX1.GH6.3.9.13_A].



7.20 Major Accidents and Disasters

Table 7.20: Major Accidents and Disasters

Reference	Issue	Comments/Issue Raised	Applicants Response
MAJ-001	Aviation	Glare from solar panels could disrupt flights; including landing and take -off; increasing the chances of crashes and emergency landings.	ES Chapter 15: Glint and Glare [APP-052] has considered the impact of glint and glare at nearby aviation receptors, including Sywell Aerodrome, in ES Appendix 15.11: Sywell Aerodrome Aviation Receptor Results [APP-165]. The modelling concludes that a 'moderate impact and therefore significant moderate effect' is predicted towards receptors at Sywell Aerodrome from tracking panels in Green Hill C and Green Hill B in Section 15.8 of ES Chapter 15: Glint and Glare [APP-052]. The Application is also supported by 'Empirical evidence on glint and glare from solar PV installations near UK Aerodromes' [APP-572]. The report provides information to supplement the assessment of effects of glint and glare on aviation receptors, providing clarity on how the modelling results are experienced in practice. The report concludes that the evidence from UK aerodromes with existing solar PV installations in their vicinity shows that none have experienced adverse glint and/or glare effects. Additionally, fields CF1 and CF2 were removed following consultation with Sywell Aerodrome and to avoid glint and glare effects. The Applicant is therefore confident that there will be no significant adverse effects from glint and glare to aviation receptors.



Reference	Issue	Comments/Issue Raised	Applicants Response
MAJ-002	BESS safety	Comments referred to concerns of fire at the Battery Energy Storage System (BESS); due to its location in flood-prone land. Comments referred to the safety of installing the BESS - claiming the construction of the BESS could create fire risk. Comments referred to 'thermal runaway' from BESS infrastructure that can cause fire. Comments referred to concerns of fire risk at Green Hill BESS; as the Application proposes minimum staffing levels. Comments questioned what mitigation was in place to reduce the risk of fire at Green Hill BESS. Comments raised concern about the risk of fire on neighbouring residential properties. Comments raised concerns regarding the Outline Battery Storage Safety Management Plan [APP-551]; claiming it did not assure that BESS-related fire would be adequately managed. Remote management of the BESS site will lead to delays in responding to emergencies. Comments raised concerns of the cumulative impact of both Green Hill BESS situated alongside the BESS proposed by Statera Energy; and a third large-scale lithium-ion battery site in close geographic proximity. Comments raised concern about the risk of terrorism with the BESS as a target.	The OBSSMP Revision A [EX1/GH7.7_A] provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. The purpose of this OBSSMP is to identify how the Applicant will use good industry practice to both prevent and reduce risk to life, property, and the environment from a BESS failure event. Prior to the commencement of construction of the BESS, the Applicant will be required to prepare a BSSMP which must be in accordance with this OBSSMP Revision A [EX1/GH7.7_A]. As part of preparation of the detailed BSSMP, the Applicant will incorporate the latest good practices for battery storage safety, failure detection and prevention, along with the emergency response planning, as guidance continues to develop in the UK and internationally. This is secured in Schedule 2, Requirement 6 of the Draft DCO Revision A [EX1/GH3.1_A] and must be approved in consultation with Northamptonshire Fire and Rescue Service and the Environment Agency. ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167] demonstrates that there are no significant impacts on all sensitive receptors within a 1 km radius of BESS areas. The modelling report assesses the environmental impact of a BESS thermal runaway incident to sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃),



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the lack of trial; suggesting it is safe to reside next to BESS infrastructure.	nitrogen dioxide (NO ₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility to the local road network.
MAJ-003	Emergency services	Comments referred to the lack of a safety plan; and how emergency services will respond to fire and serious accidents. Comments questioned what additional measures will be in place for emergency services to respond to accidents; claiming the emergency response should account for rural access limitations and the presence of livestock and horses.	A BESS system and site-specific Emergency Response Plan (ERP) will be developed at the detailed design stage, based on national and international best practice measures. The ERP is secured in Requirement 6 and 13, Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] . The Applicant has also consulted with Northamptonshire Fire and Rescue Service to ensure the proposals meet their requirements in an emergency.
MAJ-004	Fire risk	Comments questioned how risk of fire will be mitigated; due to proximity to residential properties and villages. Comments claimed there is significant risk of fire; evidenced in other countries. Comments referred to the risk of fire during the installation of solar panels. Comments referred to the risk of fire on local aerodrome in Sywell. The close proximity to flight paths could disrupt aerodrome operations and spread contaminants.	The OBSSMP Revision A [EX1/GH7.7_A] provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. ES Chapter 16: Air Quality [APP-053] provides a full assessment of air quality impacts for fires, while ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167] demonstrates that there are no significant impacts on all sensitive receptors within a 1 km radius of BESS areas. Resultantly, ES Chapter 18: Human Health [APP-055] finds no significant adverse effects to health as a result, subject to implementation of mitigation and prevention measures.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the risk of fire; with electricity and water mixing. Comments referred to the risk of fire affecting those with respiratory illnesses. Comments referred to the lack of plan to respond to smoke plume from any fire; and the toxic smoke moving towards residential properties. Comments referred to the risk of fire from pylons located close to the planned cables which could cause electrical safety problems. Comments referred to the risk of fire from the cabling.	The risk of fire from solar panels or cabling is minimal, with the greatest risks occurring as a result of potential damage to circuitry, or electrical arcing or sparking. This is able to be mitigated through good practice measures during construction, operation, and decommissioning as secured through the OCEMP Revision A [EX1/GH7.1_A], OOEMP Revision A [EX1/GH7.2_A] and ODS Revision A [EX1/GH7.3_A] which are secured in Schedule 2, Requirements 13, 14 and 21 respectively of the Draft DCO Revision A [EX1/GH3.1_A].
MAJ-005	Security breaches	Comments referred to inadequate fencing around the Scheme that could enable access to hazardous areas, if not implemented effectively.	Please refer to Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A] for fencing within the Scheme. Please also refer to the Applicant's responses to NNC-079 to NNC-082 in relation to crime prevention.



7.21 Minerals

Table 7.21: Minerals

Reference	Issue	Comments/Issue Raised	Applicants Response
MIN-001	Environmental Impact	A comment expressed concerns regarding the environment impact of mineral mining and the chemical waste from production.	Please refer to the Applicant's response to 'SOC-011' regarding supply chain matters. ES Chapter 11: Minerals [APP-048] and the OCEMP Revision A [EX1/GH7.1_A] provides outline detail regarding the storage management, and remediation of contamination from onsite excavation. The Applicant will comply with all other applicable legislation when constructing the authorised development, including waste management legislation. Whilst no explicit reference is made to waste management legislation at this stage, this can be secured as required through the final CEMP, OOEMP Revision A [EX1/GH7.2_A] and the ODS Revision A [EX1/GH7.3_A], which is secured by Requirements 13, 14 and 21, Schedule 2 (respectively) of the Draft DCO Revision A [EX1/GH3.1_A].



7.22 Noise and Vibration

Table 7.22: Noise and Vibration

Reference	Issue	Comments/Issue Raised	Applicants Response
NOI-001	Building damage	Comments referred to concerns regarding the vibrations that will occur during construction activities; potentially damaging medieval properties in Easton Maudit.	Two heritage assets were identified where there is a potential for vibration impacts as a result of construction traffic during the construction phase, the Grade II Listed Station Lodge (NHLE 1294156) and Low Farmhouse (NHLE 1371681). It was agreed during consultation (see ES Appendix 12.8: Consultation Tables [APP-148]), that a condition survey would be sufficient mitigation before and after the construction phase. Any impacts would be avoided through the implementation of an OCTMP Revision A [EX1/GH7.7_A]. Identified impacts to listed buildings would be indirect and related to elements of their setting that contribute to their significance. As detailed in the ES Chapter 14 Noise and Vibration [APP-051], a noise and vibration assessment has been completed which assesses the noise and vibration levels associated with the construction of the Scheme. All residual effects have been assessed to be not significant.
NOI-002	Construction noise	Comments referred to concerns that noise from the construction of the Scheme will engulf neighbouring communities. Comments referred to noise from construction destroying the quiet rural life. Comments referred to concerns that the noise from construction activities will impact local wildlife and animal health - i.e. horses. Comments referred to concerns the noise from HGVs will disturb the villages	As detailed in the ES Chapter 14 Noise and Vibration [APP-051], noise modelling has been completed which assesses the noise levels associated with construction. All impacts are deemed either negligible or low, with residual effects deemed not significant. The Equality Impact Assessment [APP-564] looks at the potential for the Scheme to affect vulnerable persons, and concludes that with the mitigation and enhancement measures incorporated into the Scheme, no differentiated or disproportionate impacts on groups with protected characteristics are predicted.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to concerns that the noise from construction activities will cause sensory issues for vulnerable residents. Comments referred to the noise disruption that will occur as a result of the cable installation. Comments referred to increased noise pollution; particularly during the construction phase and due to the use of heavy goods vehicles.	
NOI-003	Cumulative impact	Comments referred to concern regarding the increase in noise level; following the development of one 49.9MW BESS and potential development of another one; in addition to the BESS proposed in this Scheme.	The cumulative impacts from noise and vibration have been considered in ES Chapter 14 Noise and Vibration [APP-051] and find no significant cumulative effects. The cumulative impacts are also summarised in ES Chapter 25 Cumulative Effects and Effects Interactions [APP-062] for full cumulative assessment.
NOI-004	Operational noise	Comments referred to raised concerns the operation of the solar panels will create noise and disrupt them from enjoying local amenities and their daily lives. Comments referred to concerns on the impact to residents in Mears Ashby; which borders the Scheme. Comments referred to concerns the impact the Scheme would have to the communities neighbouring Green Hill G. Comments referred to concerns regarding the impact the noise from the Scheme will have on rural life	As detailed in the ES Chapter 14 Noise and Vibration [APP-051], noise modelling has been completed which assesses the noise levels associated with operation of the site (including noise from equipment associated with the solar panels). All impacts are deemed either negligible or low, with residual effects deemed not significant.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments highlighted the proximity of the solar farm to residential properties; which would exacerbate noise pollution.	



7.23 Other Environmental Matters

Table 7.23: Other Environmental Matters

Reference	Issue	Comments/Issue Raised	Applicants Response
OEM-001	Hazardous waste	Comments referred to concerns that the disposal of lithium holds significant implications on toxic waste.	Recycling and waste measures will be implemented by the Applicant, as outlined within the OCEMP Revision A [EX1/GH7.1_A] , OOEMP Revision A [EX1/GH7.2_A] and ODS Revision A [EX1/GH7.3_A] . The detailed versions of these plans, including the measures to be implemented, must be approved by the relevant planning authority under Requirements 13, 14 and 21 (respectively) within Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A] . In line with industry good practice measures, the management plans include provisions to maintain site tidiness, such as the requirement for clearly labelled waste receptacles. Any materials requiring removal from the Sites, such as batteries following their replacement, would be transported using licensed carriers and managed in accordance with the relevant regulations.
OEM-002	Light pollution	Comments referred to the disruption caused during the operation of the Scheme; such as light pollution and facility illumination.	Standard good practice measures will be employed to minimise light spill, including glare during construction, operation and maintenance and decommissioning. Lighting will be required during the construction and decommissioning phases for safety reasons but will be temporary in nature and predominately limited to the core working hours. The OCEMP Revision A [EX1/GH7.1_A] , OOEMP Revision A [EX1/GH7.2_A] and the ODS Revision A [EX1/GH7.3_A] detail principles to ensure potential impacts are minimised.
OEM-003	Material lifecycles	Comments referred to concerns on the sourcing and recycling of materials used for the production of the solar panels and the BESS. Comments referred to panels being sourced from China and raised	Panel recycling is set out in ES Chapter 24 Other Environmental Matters Revision A [EX1/GH6.2.24_A] . The OCEMP Revision A [EX1/GH7.1_A] , OOEMP Revision A [EX1/GH7.2_A] and ODS Revision A [EX1/GH7.3_A] commit to waste control measures including panel recycling at all stages of the Scheme's lifespan. Further details will be provided in the final construction environmental management plan, operational environmental



Reference	Issue	Comments/Issue Raised	Applicants Response
		concerns about the disposal of associated materials such as glass and batteries. Comments referred to objections about being surrounded by man made structures that are not environmentally friendly or recyclable. Comments referred to the use of unsustainable materials.	management plan and decommissioning statement as secured in Requirements 13, 14 and 21 respectively of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. The Scheme will follow the Rochdale Envelope Advice note and will allow flexibility to utilise technological advances. Island Green Power, the parent company of the Applicant, is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses when sourcing the panels. Paragraph 5.4.7 of the OSSCEP [APP-552] states that "All international suppliers will be held to a minimum quality with regard to professional and ethical working practices as agreed by the members of Solar Energy UK." The Applicant confirms that a detailed Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
OEM-004	Recycling	Some comments raised queries around recycling the infrastructure after decommissioning and asked questions about contamination.	Please refer to the Applicant's response to 'EMPM-010'. Under current UK legislation, solar panels are treated as Waste Electronics and Electrical Equipment and therefore must be separated from other waste and handled at an approved authorised treatment facility. Similarly, BESS infrastructure is controlled under The Waste Batteries and Accumulators Regulations 2009. These require battery producers to receive, sort, and suitably handle batteries and deliver to an approved battery treatment operator for treatment and recycling. As such, any potential for contamination will be managed by transport offsite to one of these approved facilities. The ODS Revision A [EX1/GH7.3_A] provides for decommissioned infrastructure to be managed in accordance with the applicable legislation relating to waste and recycling that is in force at that time.



Reference	Issue	Comments/Issue Raised	Applicants Response
OEM-005	REM extraction	Comments referred to the extraction of rare materials during construction and how they can cause lasting environmental damage.	Please refer to the Applicant's response to 'OEM-003'.



7.24 Principle of Development

Table 7.24: Principle of Development

Reference	Issue	Comments/Issue Raised	Applicants Response
PRI-001	Cumulative effect	Comments referred to the cumulative effect of multi-solar solar farms in operation or under construction and the impact it would have on the local communities.	Please refer to the Applicant's response to 'CRNBPC-011'.
PRI-002	General disruption	Comment referred to the general disruption of cabling construction work connecting to the BESS Site; passing through villages; disrupting wildlife and creating traffic. Comments referred to the underground cabling as a general disruption; including the time it takes to install. Comments referred to the severe disruption to Grendon village; when the cable route will connect to Grendon substation. Comments referred to the lack of information on timings; starting location; ending location; site locations; access road layouts / timings during maintenance and construction.	The assessments set out within the Environmental Statement [APP-038 to APP-064] have been undertaken to identify the likely effects of the Scheme during its construction, operation, and decommissioning phases. Where significant effects have been determined to be likely, the Scheme includes mitigation measures to reduce adverse effects and disruption. The measures are secured through the relevant mitigation and management plans secured by Requirements in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Many of these mitigation measures and management plans have been presented as 'Outline' versions, allowing for the principles to be agreed through the DCO application and examination process. Full detailed versions of these management plans are secured in the relevant Requirement in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A], which require these detailed documents to be 'substantially in accordance' with their outline counterparts, and to be agreed by the relevant discharging authority (usually the local planning authority, in consultation with statutory bodies such as the Environment Agency where relevant). With the mitigation embedded in the design of the Scheme and these management plans in place, the effects of the



Reference	Issue	Comments/Issue Raised	Applicants Response
			Scheme will be reduced to the residual effects reported in ES Chapter 26: Summary of Likely Significant Effects [APP-063] .
PRI-003	General objection	Comments were generally objecting to the Scheme.	The Applicant notes these comments, and hopes to have addressed the commenters' concerns throughout this response document.
PRI-004	General support	Comments broadly supported the use of solar panels to generate sustainable energy. Comment referred to supporting the project and cabling routes based on land classification.	The Applicant notes these comments and welcomes support for the Scheme.
PRI-005	Land use	Comments raise points land should be returned to agricultural land after Solar PV use. Comments raise concerns that land may be classified as brownfield land after Solar PV use. Comments referred to concerns that the land being used will one day be classified as a brownfield site and be used for housing. A comment claimed the Application is a 'smoke screen' for building more houses. Comments referred to the risk of precedent, fearing that approval could open the way for further large scale projects nearby. Comments referred to the land that is under consideration for the cable route; claiming too much space has been used already.	The Applicant confirms that the measures set out in ODS Revision A [EX1/GH7.3_A] together with OSMP [APP-550] (as secured by Requirements 21 and 19 of Schedule 2 to Draft DCO Revision A [EX1/GH3.1_A] respectively) require the agricultural land used for the Scheme to be restored to the standard of the existing baseline ALC Grade. Based on current policy, the land use is not changed from agricultural land, and as such, there is no policy position for the land to be considered 'brownfield' or 'previously developed'. Should any other large-scale solar developments be proposed nearby, these would have to be assessed on their own merits rather than relying on the Scheme as a set precedent. Furthermore, any future Scheme would have to assess their impacts cumulatively with this Scheme. Land used for the cable route will be restored once the cable has been installed, allowing this land to return to



Reference	Issue	Comments/Issue Raised	Applicants Response
			existing use no later than the completion of construction activities on the Scheme.
PRI-006	Longevity	Comments claimed the Scheme will change the countryside forever. Comments claimed the operational term will be longer than 60 years. Comments claimed the 60 year operational term is not 'temporary' development. Comments referred to the 60-year operational term of the Scheme; claiming that materials have a lifespan of 25 years.	The operational life of the Scheme will be a maximum of 60 years. This is the maximum operational lifetime being applied for by the Applicant. Once the Scheme ceases to operate, it will be decommissioned as secured by Requirement 21 of Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A]. It is a criminal offence to not comply with the Requirements, providing assurance that the Scheme will be decommissioned after 60 years. Onsite infrastructure with a lifetime of less than 60 years is identified in ES Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A] and thus may require replacement. This has been assessed as part of the assumption of operational and maintenance requirements for the Scheme, including assessment of a peak replacement scenario in the Environmental Statement [APP-038 to APP-064].
PRI-007	National bans on solar	Comments referred to objections based on other countries; such as Spain; banning similar developments.	The Applicant infers that this is referring to the June 2024 decree by the Meloni government in Italy that restricted new photovoltaic installations on land designated as agricultural, that was partially invalidated in May 2025. To 'ban' or restrict ground-mounted photovoltaics in the UK in the same manner would contradict current national policy and guidance on delivering net zero energy and improving energy security in the UK. These are set out further in the Statement of Need [APP-556].
PRI-008	Size and scope	Comments referred to the significant size and scope of the solar farm; which would cover large areas of prime farmland.	Please refer to the Applicant's response to 'SGHS-070'.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the scale of the development; noting that the combined use of greenfield and brownfield land would be nearly equal in size to Heathrow Airport.	



7.25 Socio-Economics, Tourism and Recreation

Table 7.25: Socio-Economics, Tourism and Recreation

Reference	Issue	Comments/Issue Raised	Applicants Response
SOC-001	Access to the countryside and use of recreational space	Comments referred to the closure of bridleways and footpaths - claiming the Scheme will place restrictions on the access to the green spaces. Comments claimed the closure of bridleways will affect dog-walking and horse-riding. Comments referred to concerns raised about the land being fit for dog walking or horse riding. Comments referred to the loss of business such as at a local cafe; due to closure of footpaths that are used by dog-owners and walkers. Comments referred to the closure of roads; claiming it will impact deliveries- subsequently impacting businesses. Comments referred to the loss of farmland and the resulting restriction of access to public footpaths near the proposed site. Comments referred to the loss of recreational spaces that communities currently enjoy. Comments referred to the disruptions to footpaths and bridleways that are used for recreational activities.	With respect to disruption and construction impacts on PROWs, please refer to the Applicant's response to 'SGHS-069'. Roads are only to be closed if open trenching is required for the Cable Route Corridor. In this instance, any closures would be temporary and as short as feasible, with sufficient notice, signage and diversions put in place to ensure access to properties on these roads are not significantly affected. This is secured through the OCTMP Revision A [EX1/GH7.9_A] which is secured through Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
SOC-002	Enjoyment of PROW and	Comments referred to compromising footpaths and green spaces and that this will	Impacts on PROWs and recreational routes are set out in ES Chapter 17: Socio-Economics, Tourism



Reference	Issue	Comments/Issue Raised	Applicants Response
	recreation routes	foster a sense of isolation and despair among communities. Comments claimed the footpaths will be made unattractive due to 'loss of the countryside'. Comments referred to the proposed access to a substation to be constructed at the side of the White House industrial estate adjacent to the A4500; claiming it will obliterate a protected footpath. Comments referred to respondents raised concerns around public rights of way. Comments referred to the Scheme's associated infrastructure; such as lighting; fencing; and facility illumination at night; affecting the rural setting. Comments referred to the glint and glare from solar panels; disrupting cyclists; equestrians and walkers.	and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. During the Scheme's operational lifetime, the routing of all existing PRowWs is preserved, with additional commitment to providing an enhanced user experience through additional hedgerow screening, planting of tussocky grassland to enhance ecology and biodiversity next to PRowWs, and providing upgraded permissive links to increase PRow network connectivity. These measures are secured through the OLEMP Revision A [EX1/GH7.4_A] which itself is secured by Requirement 7 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. With respect to the area adjacent to White House Industrial Estate and the A4500, this is solely to provide a new permissive route for pedestrians and equestrian users to create a continuous off-road route from Earls Barton to Mears Ashby, through Green Hill E, where no existing public right of way exists. No vehicular access is proposed at this location.
SOC-003	Equestrian - health and wellbeing	Comments referred to concerns that the works will negatively affect the well-being of horses. Comments referred to the increased risk of flooding in stables. Comments referred to the impact of glare from panels on horses. Comments referred to the closure of bridleways of affecting horse-riding.	Equestrian businesses and facilities with public access (such as riding schools) likely to be impacted by the Scheme have been assessed in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] due to their economic and recreational function. Subject to mitigation to limit impacts from HGV traffic, no residual significant adverse effects to any single facility are anticipated as a result of the Scheme. ES Chapter 15 Glint and Glare [APP-052] assesses the potential for impacts of glare on horses, finding no significant effects. Please



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to concerns that the construction noise and activities will affect horses. Comments referred to impact the Scheme would have on local livery businesses that rely on the custom from horse-riders. Comments cited construction activities such as the closure of local traffic roads; increased traffic and HGVs as causes of disruption.	refer to the Applicant's response to TL-004 for further information. Direct impacts on PRowWs including bridleways, have also been assessed in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. These identify that no residual significant adverse effect to PRowWs is anticipated at any phase of the Scheme, subject to implementation of mitigation and enhancement measures. Safety of PRow users is secured through the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
SOC-004	Impact to tourism and local businesses	Comments referred to the impact to tourism; claiming the appeal of the countryside; such as tourist walking routes; tourist sites and the overall appeal of the countryside will be diminished as a result of the Scheme. Comments referred to the loss of business for rural businesses that attract tourists. Comments referred to the damage to the cultural tourism in the area and to rural businesses. Comments referred to the loss of businesses; such as glamping sites. Comments referred to the inadequate assessment of the impact to local economy and tourism.	Please refer to the Applicant's response to 'MAPC-008'.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the loss of businesses during the construction of the Scheme - as they rely on local economy and ease of access. Comments referred to access to Sywell Airport; Beckworth Emporium; the 2 local Garden Centres; The Griffins Head and Sywell Country Park.	
SOC-005	Impacts on agriculture	Comments referred to the potential for some farms to become unviable; which would negatively affect rural communities. Comments referred to the potential adverse effects on the local economy resulting from the loss of productive farmland. Comments referred to the detrimental impact that the loss of farmland would have on local lifestyles and rural living. Comments expressed concerns about the personal and long-term impacts on individuals who would lose land. Comments referred to tenant farmers potentially losing land against their wishes; which could make it difficult for them to maintain the viability of their farms.	The assessment of impacts to farming landholdings, including tenancies on Green Hill F, is set out in ES Chapter 20: Agricultural Circumstances [APP-057]. Of assessed landholdings impacted, no more than 27% of any individual landholding is to be included in the Scheme. Based on the likely proportion of land removed from arable use and knock on effects on suppliers or producers, the assessment in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] estimates that this will cause a long-term loss of 12 agricultural jobs or £493,000 GVA per annum. This is equivalent to a 0.2% loss to the agricultural economy in the Study Area (Bedford, North Northamptonshire, West Northamptonshire and Milton Keynes City).
SOC-006	Impacts on specific locations or events	Comments referred to the historical footpaths and bridlepaths; that will be affected as a result of the Scheme. Comments referred to Three Shires Way - a walking; cycling and horse-riding path that links Milton Keynes and the surrounding areas.	The Applicant confirms a full assessment of tourism destinations, PROWs, and recreational facilities is set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. The below residual effects, subject to mitigation and enhancement measures are set out.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the impact to footpaths TD005/TP206 and TD007/TP205 (GH2.6). Comments referred to the impact on local tourist events such as the International Waendal Walk which attracts 5000 walkers worldwide; boosting local economy; and culture. Comments referred to the Scheme's proximity to villages such as Holcot; which contains pathways that are used by walkers and dog owners. Comments referred to the closure of Public Rights of Way through Easton Maudit; claiming the Scheme's associated infrastructure such as fencing; CCTV; inverters and panels will transform the experience of walkways. Comments referred to the impact on Sywell Country Park and Reservoir. Comments referred to the impact the Scheme would have on activities such as birdwatching; fishing; equestrian and village events such as the Northampton Balloon Festival.	Three Shires Way: construction – moderate adverse effect (significant), operation and replacement phases – moderate-minor adverse effect (not significant). Footpaths TD5 and TD7: construction – moderate-minor adverse effect (not significant), operation and replacement phases – minor adverse effect (not significant). Waendel Walk: construction – moderate adverse effect (significant), operation and replacement phases – moderate-minor adverse effect (not significant). Please refer to the OPROWPPMP Revision A [EX1/GH7.10_A] where commitments have been made to ensure this route is kept open wherever practicable throughout the construction of the Scheme. PROWs in Holcot: the most greatly affected is footpath CW1: construction and replacement phases – moderate-minor adverse effect (not significant), operation– minor adverse effect (not significant). PROWs in Easton Maudit: those assessed are footpaths TD1, TD2, TD3, TD5, TD7, and bridleways TD8 and TD9: construction – moderate-minor adverse effect (not significant), operation and replacement phases – minor adverse effect (not significant). Sywell Country Park: construction – moderate-minor adverse effect (not significant), operation and replacement phases – minor adverse effect (not significant).



Reference	Issue	Comments/Issue Raised	Applicants Response
			No significant adverse effects to fishing, waterways, or equestrian facilities have been assessed. Birdwatching and village events have not been assessed. The Northampton Balloon Festival has also not been assessed as it is located primarily within Northampton's urban area. The Scheme is most likely to be visible during balloon flights but is likely to be a landscape feature rather than interrupting the ability for the event to take place or run.
SOC-007	Loss of amenities	Comments referred to the impact loss of amenities can have on locals; visitors and businesses. Comments referred to impact of loss of amenities. Comments referred to the impact on the land around local villages which will affect wildlife; walkers; riders; farmers; visitors; and locals.	The Applicant confirms a full assessment of tourism destinations, PROWs, and recreational facilities is set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. Significant adverse effects are largely able to be mitigated against, with the exception of long-distance recreational routes during the Scheme's construction and decommissioning, due to their level of importance. The impact of the Scheme on tourism and recreation is anticipated to result in a temporarily halt of up to 29 FTE jobs dependent on leisure, tourism and visitor spending during construction, and estimated to have a long-term loss of 10 tourism-dependent jobs during its operational lifetime. The Scheme will be providing upgraded permissive links to increase PROW network connectivity, which will be managed in accordance with the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the



Reference	Issue	Comments/Issue Raised	Applicants Response
			Draft DCO Revision A [EX1/GH3.1_A] . Please also refer to ECO-005 in respect of the potential for the Scheme to affect local wildlife.
SOC-008	Onsite employment and economic impact	Comment referred to the possibility of job creation; but noted that the roles may not be suitable for local residents due to differing skill sets. Comments referred to the long-term job opportunities; raising concerns they would be minimal; as the site would require very little ongoing maintenance. Comments referred to a potential loss of jobs following the construction phase. Comments referred to the displacement of existing jobs in the farming and industrial sectors.	Please refer to the Applicant's response to 'SBMP-009'.
SOC-009	Property value	Comments referred to concerns the Scheme will impact the value of residential properties. Comments referred to concerns about having to sell homes due to the development of this scheme. Comments cited the loss of the rural appeal and the large-scale development engulfing villages as reasons why the countryside will be an undesirable area to reside. Comments referred to concerns about the loss of property values in monetary terms due to the development of this scheme.	Impacts on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the Environmental Statement (see ES Appendix 2.2: EIA Scoping Opinion [APP-075]). This is because there is no empirical evidence that industrial scale solar farms cause significant long-term adverse effects on property prices. Whilst it is acknowledged that there have been no studies of completed >50MW solar Schemes in the UK, studies from the USA and Netherlands do not show any definitive evidence of adverse effects between solar farms and property prices, and conclude that other external factors (such as wider property markets, macroeconomic trends, changes to local services such as schools and



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the loss of value in non-monetary terms. Comments referred to the loss of view of the countryside; which reduced the value of properties. Comments referred to the decrease in property value; as a result of the Scheme; subsequently affecting the local economy.	healthcare providers) are likely to be more important factors in changes to property prices. Furthermore, there is a difference between short-term troughs in property saleability during peaks in construction activity versus the long-term property value once the Scheme is operating and mitigation set in place.
SOC-010	Rural crime	Comments referred to the rise of rural crime as a result of the Scheme. Industrialisation of the countryside; placing valuable materials on site can increase agricultural and petty theft.	Please refer to the Applicant's response to 'NNC-079' to 'NNC-082'.
SOC-011	Supply chain	Comments referred to concerns around the supply chain from China; and the related ethical issues and carbon impact.	The Applicant is aware that the production of solar panels and their transport are the largest contributing factor of the Scheme towards greenhouse gas emissions, as highlighted in ES Chapter 7: Climate Change [APP-044]. These are therefore included in the assessment of GHG emissions from the Scheme. Paragraph 5.4.7 of the OPROWPPMP Revision A [EX1/GH7.10_A] states that "All international suppliers will be held to a minimum quality with regard to professional and ethical working practices as agreed by the members of Solar Energy UK." The Applicant confirms that a detailed Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



7.26 Transport and Access

Table 7.26: Transport and Access

Reference	Issue	Comments/Issue Raised	Applicants Response
TRA-001	Cabling crossing the highway	Comments referred to concerns that cabling is crossing the A45. Comments referred to the disruption to Mill Lane and wider traffic in Earls Barton; during the installation of the cables.	With respect to the A45, please refer to the Applicant's response to 'NH-005'. An assessment of construction traffic is provided in ES Chapter 13: Transport and Access [APP-050]. An assessment on impacts to individual PRow's (such as the byway open to all traffic (BOAT) on Mill Lane) is set out in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. Please also refer to the Applicant's response to CAw-001 in respect of Mill Lane. Major roads (the A4500, A45, and Grendon Road) are proposed to be crossed by Horizontal Directional Drilling (HDD) rather than by open trenches as set out in the Crossing Schedule [APP-562]. This approach avoids disruption to the road being crossed. The design parameters of the HDD activities are set out in the CDPP Revision A [EX1/GH7.17_A].
TRA-002	Construction impacts at specific locations	Comments referred to access to the proposed Green Hill BESS; claiming it will be virtually impossible for construction traffic due to the narrow bridge over the river. Comments referred to the 2 access points to Green Hill D and Green Hill E; claiming the roads will be overloaded.	The width of the bridge near to Green Hill BESS is managed through shuttle traffic signal control to maintain one-way operation. It is already regularly used by HGV movements associated with the aggregates facility and operation from Station Road. An assessment of construction traffic is provided in ES Chapter 13: Transport and Access [APP-050]. The assessment assumes construction occurring concurrently. However, detailed programmes for these Sites will help manage vehicle movements.



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments cited the bridge near Grendon Marina as too weak to bear construction traffic and load. Comments referred to the traffic on the A4500 Main Road adjacent to industrial estate and the traffic opposite Wickets Housing Estate; and the A43. Other roads of particular concern are: Highfield Road; A428; A509; Wilby Road; Holcot Lane; Sywell Lane and Earls Barton Road. Comments referred to rural roads with single traffic; tight bends and soft verges being unsuitable for construction traffic such as Wilby Road; Castle Road and Olney Road.	Identified HGV routes seek to avoid more sensitive routes through villages and largely utilise those with centre line markings and greater width. Roads such as Wilby Road are not proposed as HGV routes.
TRA-003	Cumulative impact	Comments referred to concerns about the cumulative impact of multiple solar farms in a region; particularly when they are located close to one another or near existing industrial developments. Comments referred to the lack of Assessment of Cumulative Transport Exposure; claiming it does not consider the cumulative impacts of multiple site developments and cable corridors; concurrently operating on the same rural road network at the same time.	Please refer to the Applicant's response to 'MHo-008'.
TRA-004	Existing network	Comments referred to increase of traffic near access points in Earls Barton. Concerns referred to the condition of local roads and the additional strain the project may cause.	An assessment of construction traffic and the associated effects is provided in ES Chapter 13 Transport and Access [APP-050]. The OCTMP Revision A [EX1/GH7.9_A] contains measures to manage construction traffic including



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the weight restriction of 7.5 tonne on country roads.	appropriate routes and vehicle travelling at particular times, and includes a commitment to undertake road condition surveys and to remedy damage caused by construction traffic associated with the Scheme. This is secured through Requirement 15 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A]. Several routes to access points for specific Sites are subject to restrictions on vehicle weights. These limits are in place for environmental reasons to deter larger vehicles from using local routes rather than the principal and strategic routes. The restrictions are generally in place for through movements where they allow access along those routes and so are consistent with the approach of taking access to the Sites from these routes.
TRA-005	Impacts on other highway users	Comments referred to concern regarding disruption to local communities such as Earls Barton; Walgrave and Mawsley and residents throughout the construction phase. Comments referred to the construction traffic; claiming it was not sustainable for the multi-year construction period. Comments referred to the increase in existing high-levels of traffic as a result of the construction vehicles going through narrow country lanes. Comments referred to the dangers of HGV vehicles frequently driving past nurseries and schools with no speed deterrents; such as speed cameras.	An assessment of construction traffic and the associated effects is provided in ES Chapter 13 Transport and Access [APP-050]. This specifically includes assessment of driver delay and safety. The submission includes an OCTMP Revision A [EX1/GH7.9_A] to manage HGV and worker traffic movements, including using appropriate routes and vehicles travelling at particular times. which is secured by Requirement 15, Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to the impact of increased traffic on the day-to-day lives of local community i.e. longer journey times to work and schools. Comments claimed the increase in traffic will cause delays in emergency services accessing the village and surrounding areas. Comments referred to the impact on traffic on local roads during maintenance operations. Comments referred to HGV traffic going past residential properties. Comments referred to the increase of traffic at access points.	
TRA-006	Impacts to non-vehicular highway users	Comments referred to concerns regarding the use of construction vehicles such as HGVs with abnormal loads going through narrow rural lanes. Comments claimed the large vehicles will damage community infrastructure and disrupt local communities such as dog walkers; cyclists and horse-riders. Comments claimed that construction traffic can pose hazards to horse riders, cyclists and walkers due to potential impacts on bridleways and riding routes. Comments claimed the increase in HGV vehicles on the road will be dangerous to pedestrians.	Please refer to the Applicant's response to 'MAPC-008'. Direct impacts to PRoW and recreational high users have also been assessed in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A]. These identify that no significant effect to PRoW or recreational highway users are anticipated at any phase of the Scheme, subject to implementation of mitigation and enhancement measures. Safety of PRoW users is secured through the OPROWPPMP Revision A [EX1/GH7.10_A], which is secured by Requirement 18 in Schedule 2 to the Draft DCO Revision A [EX1/GH3.1_A].
TRA-007	Information	Comments requested a complete traffic management and safety plan to replace the	The provision of a fully detailed Construction Traffic Management Plan and Operational Traffic Management Plan, both substantially in accordance



Reference	Issue	Comments/Issue Raised	Applicants Response
		Outline Plan and improved alternative routes suitable for HGV traffic.	with their outline versions, are secured by Requirements 15 and 16 respectively in Schedule 2 of the Draft DCO Revision A [EX1/GH3.1_A] .
TRA-008	Operational impacts at specific locations	Comments referred to access onto site E via the A4500 which could cause significant impacts during the entire operational life of the Scheme.	Any vehicle movements using the A4500 to access Site E would be limited to worker vehicle movements. HGVs are required to use other routes to access Green Hill E. During the operational phase of the Scheme, movements will be low and largely imperceptible outside of periods of programmed replacement of infrastructure, during which periods routing requirements will be in place.
TRA-009	Related impacts	Comments referred to the increase in noise as a result of increased traffic. Comments referred to the risk to local wildlife and birds, from the HGV vehicles going through small villages.	ES Chapter 14 Noise and Vibration [APP-051] contains an assessment of noise and vibration impacts from construction and operational traffic and finds no significant adverse effects on surrounding receptors. Full assessments of potential impacts upon habitats and wildlife from the Scheme (including from disturbance impacts such as noise, where considered relevant) are provided in ES Chapter 9: Ecology and Biodiversity Revision A [EX1/GH6.2.9_A]. Impacts directly related to HGV movements have not been assessed beyond habitat loss to create or improve site access points.