GREEN HILL
SOLAR FARM

Green Hill Solar Farm
EN010170

Applicant's Responses to ExA First Written Questions

Prepared by: Lanpro Services

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Contents

Issue Sheet

Report Prepared for: Green Hill Solar Farm
Examination Deadline 1

Applicant's Responses to ExA First Written Questions

Prepared by

Name: Anna Rowan

Job title: EIA Consultant

Approved by

Name: Jane Crichton

Job title: Associate Planning Director

Revision	Date	Prepared by	Approved by
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1 Introduction

1.1.1 This report responds to the Examining Authority's (ExA) first written questions, issued on 28 October 2025 **[PD-006].** It responds to each of the questions posed to the Applicant.

1.1.2 Section 2 of this report is tabulated to include the ExA's questions and a response to each question as follows:

- General and Cross-topic Questions;
- Cumulative effects;
- Design, parameters and other details of the proposed development;
- The Environmental Statement (general);
- Need;
- Site selection and alternatives;
- Air quality and emissions;
- Biodiversity, ecology and natural environment;
- Habitat Regulations Assessment;
- Compulsory acquisition, temporary possession and other land or rights considerations;
- The draft Development Consent Order (DCO);
- Historic Environment;
- Climate Change;
- Land use and soils;
- Glint and Glare;
- Landscape and Visual;
- Noise and Vibration;
- Battery Energy Storage System (BESS);
- Socio-economics effects;
- Transport and Traffic;
- Water Environment; and
- Minerals.

2 Topic Questions

2.1 General and Cross-topic Questions

ExQ	Respondent	Question	Applicant's Response
Q1.0.1	National Grid Electricity Transmission Plc (NGET)	**Grid Connection Statement** The applicant's Grid Connection Statement [APP-557] sets out the position regarding connection agreements and other matters. Could you confirm that everything is accurate within that document as it pertains to your organisation?	The Applicant notes that this question is not directed at the Applicant.
Q1.0.2	The applicant	**Grid Connection Statement** In your Grid Connection Statement [APP-557] it may just be the introduction of a semi-colon in error at the end of paragraph 4.2.1 (or that the following paragraph should be a single bullet point rather than have a paragraph number), but it has left the Examining Authority (ExA) unsure of what NGET is responsible for delivering. Is it everything listed under paragraph 3.4.1? If so, can you amend section 4.2 so that point is entirely clear.	The Applicant confirms that NGET is responsible for overseeing, the installation of Work No. 4 by the Applicant for example, but not limited to, issuing design approval and work permits. Article 36 of the **Draft DCO Revision A [EX1/GH3.1_A]** provides that the provisions of the Order are for the benefit of the Applicant (as undertaker) and NGET in respect of Work No. 4 only. This ensures that, should NGET prefer, it may opt to carry out the works constituting Work No. 4, located within its existing Grendon Substation, on the Applicant's behalf. In respect of section 4.2, the Applicant confirms a minor typographical error in that paragraph 4.2.2 should be a single bulleted item, confirming NGET's responsibility for overseeing the Applicant's works. Given the limited nature of this change, the Applicant considers that it does not materially alter the content of the **Grid Connection Statement [APP-557]** and therefore does propose to submit an updated version of the document.
Q1.0.3	All local planning authorities	**Neighbourhood Plans** The Applicant's submitted Policy Compliance Document [APP-567] identifies two adopted Neighbourhood Plans (NP) (for Earls Barton and for Lavendon) relevant to the application. Can you confirm that these are the only two NPs which impact on the proposed development, or are there other adopted or emerging NPs which need to be considered as part of this examination?	The Applicant notes that this question is not directed at the Applicant.
Q1.0.4	The applicant	**Battery Energy Storage System (BESS) sites** Do all application documents include discussion of both potential Battery Energy Storage System (BESS) sites, i.e. at Grendon and Green Hill C, so as to apply the Rochdale Envelope?	The Applicant has adopted a maximum design scenario approach, assessing the Scheme on the basis of the maximum project design parameters relevant to the technical discipline i.e. the reasonable worst case scenario for impacts. The application of the Rochdale Envelope is set out in Section 4.3 of **ES Chapter 4 Scheme Description Revision A [EX1/GH6.2.4_A]**. As outlined within the **Draft DCO [APP-017]** and shown on the **Works Plans Revision B [EX1/ GH2.4_B]**, Work No.2 includes Energy Storage Facility at Green Hill BESS and at Green Hill C. The Applicant has assessed the scenario of the BESS being located on both Green Hill BESS and Green Hill C for all environmental topics, as set out in paragraph 4.4.28 of **ES Chapter 4: Scheme Description Revision A [EX1/GH6.2.4_A]**, as this represents a worse case compared to the BESS being located on only one of those sites.
Q1.0.5	All local planning authorities	**Cumulative developments** Do the local planning authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they please identify which cumulative developments have been omitted from which assessments and explain why they consider that they should be included.	The Applicant notes that this question is not directed at the Applicant.
Q1.0.6	All local planning authorities	**Local Development Plans and Policies** If not in your Local Impact Report (LIR), all local planning authorities are asked to provide full copies of any Development Plan policies referred to in any of your submissions and to confirm the status of the relevant plan. Should you refer to any additional Development Plan policies which have not yet been provided at any time in your future submissions to the ExA, please	The Applicant notes that this question is not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		also submit copies of these into the Examination. The ExA also requests to be kept up-to-date on changes to the status of any Development Plan which a Local Authority has previously relied upon during Examination.	
Q1.0.7	All local planning authorities	**National and Local Planning Policies** The Policy Compliance Document [APP-567] assesses the proposed development against national and local policies. Are the local planning authorities content with the applicant's policy analysis?	The Applicant notes that this question is not directed at the Applicant.
Q1.0.8	Applicant All local planning authorities Prescribed consultees Interested parties	**Policy and guidance** Are you aware of any updates or changes to Government Policy or Guidance (including emerging policies) relevant to the determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications for the application?	The Applicant is not aware of any updates to Government policy or guidance of relevance to this Scheme since the DCO submission. The Applicant considers that the Government's Solar Roadmap published in June 2025 (Ref 1.1) does not contain any new planning relating policies applicable to the Scheme albeit that it does reiterate the Government's support for solar. The Applicant is aware that Milton Keynes City Council are proposing to publish the Proposed Submission version (Regulation 19) of the Milton Keynes City Plan 2050 for consultation in November and December 2025. Once the consultation has commenced the Applicant will review the emerging local plan and make any relevant policy updates and submit into examination at the appropriate deadline.
Q1.0.9	All local planning authorities	**Planning applications and consents** Please provide an update on any submitted planning applications or consents granted since the application was submitted which could either affect the proposed development or be affected by it, and whether these would affect the conclusions reached in the Environmental Statement.	The Applicant notes that this question is not directed at the Applicant.
Q1.0.10	All local planning authorities Other interested parties (including Statutory Undertakers)	**Committed developments** The applicant has provided Appendix 25.1 Long List of Committed Developments [APP-188] and Appendix 25.2 Short List of Committed Developments [APP-189]. Can the host local authorities confirm whether they are content with the list provided, or whether there are any further projects that they wish to add? Other interested parties, including Statutory Undertakers, are also invited to comment.	The Applicant notes that this question is not directed at the Applicant.
Q1.0.11	The applicant	**Consents and agreements** The Consents and Agreements Position Statement [APP-555] describes consents and agreements which the applicant considers may be required to supplement powers within the draft development consent order. The applicant is requested to: 1. Provide an update on progress with obtaining these consents, licences and permits; 2. Include a section providing an update on these consents, licences and permits in any emerging Statements of Common Ground which are being drafted with the relevant consenting authorities.	The Applicant has updated the **Consents and Agreements Position Statement Revision A [EX1/GH7.11_A]** to include the 'Licence for works that may disturb a military crash site'. The Applicant has applied for a licence on a precautionary basis and will continue to engage with the JCCC as to the need for the licence and any conditions required. The other consents and licences, excluding the Protected species license, that are likely to be required as set out in Table 1 of the **Consents and Agreements Position Statement Revision A [EX1/GH7.11_A]** are required post DCO-consent and prior to construction commencing. They either take the form of standard consents relating to construction activities, such as those relating to health and safety; or it is not anticipated that such a license will be required, but this cannot be ruled out until the detailed design stage. No further progress will be made in respect of these consents at this time. In respect of protected species licences, the potential for impacts on protected species (and, by extension, the requirement for protected species mitigation licences) has been avoided as far as practicable through sensitive design of the Scheme, including the implementation of a range of protective buffers around sensitive ecological features, such as badger setts and trees suitable for roosting bats. At the time of submission of the DCO application, 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. The Applicant is

ExQ	Respondent	Question	Applicant's Response
			progressing its application with NatureSpace and will provide confirmation that District Licensing may be used by the Scheme once this is received. Whilst there is potential for other protected species licences to be required 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 for and scope of any required licences such as this is not currently known and cannot be known until the detailed design stage. As such, it is considered that there is insufficient information available to draft the licence application required for Natural England to be satisfied that a Letter of No Impediment may be issued.
Q1.0.12	All local planning authorities Prescribed consultees	**Potential Main Issues for Examination** The Potential Main Issues for Examination document [APP-568] provides a summary of the principal areas of disagreement between the applicant and local planning authorities and consultees. Are all parties content with the summary of the position provided by the applicant and the principal areas of disagreement identified at time of submission of the application?	The Applicant notes that this question is not directed at the Applicant.
Q1.0.13	Applicant All local planning authorities	**Legal Agreements** Can the applicant set out what consideration it has given to the need to develop a Section 106 agreement with the host local authorities (HLA)? And, if the applicant feels there is a need for one, what are the topics and issues that the Section 106 Agreement should cover? Can the HLAs confirm their position on the matter, and whether any discussions or consideration have been given to this?	To date there has been no suggestion that any matters require the need for a Section 106 agreement to deal with any obligations and none of the HLAs have raised the need for one through the ongoing discussions with them. This is also based on the Applicant's experience from other DCOs such as Cottam Solar Project and West Burton Solar Project where there has been no requirement for a Section 106 agreement. The Applicant will keep this under review through discussions with the HLAs and as relevant Statements of Common Ground progress.

2.2 Cumulative effects

ExQ	Respondent	Question	Applicant's Response
Q2.0.1	NGET	**Weston Marsh to East Leicestershire project:** Your relevant representation [RR-1240] references the Weston Marsh to East Leicestershire project (WMEL), and that the proposed Order Limits for Green Hill overlaps land required for WMEL. Could you indicate to the ExA the extent of the overlapping land between the two projects and provide us with a broad timeline for the WMEL project.	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. Based on publicly available information, construction of the project is scheduled to take place between 2029 and 2033, which is after the construction phase of the Scheme. Therefore, it can be reasonably assumed that there will be no cumulative impacts during the Scheme's construction. Additionally, works in the vicinity of the Scheme are understood to involve upgrades to existing overhead lines. The Scheme has incorporated offsets for existing above-ground infrastructure, as outlined in **ES Chapter 24: Other Environmental Matters Revision A [EX1/GH6.2.24_A]** and **ES Chapter 27: Commitments Register [APP-064].** 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 designed to accommodate the existing overhead lines, means the projects can readily coexist.
Q2.0.2	The applicant	**Other BESS schemes:** Table 3 in the Statement of Need [APP-556] sets out the NESO TEC Register entries for connection at Grendon, and notes a BESS with 41MW capacity effective from October 2027. Is this the Grendon Lakes Battery Storage Facility that has been included in your assessment of cumulative effects? There is a further BESS scheme listed in Table 3 with agreement to connect at Grendon with 1330MW capacity effective from December 2034. Should the cumulative effects of this much larger proposal also be considered?	As stated in the **Statement of Need [APP-556]** in paragraph 6.1.14 "*Although lists and registers provide important evidence towards current and future generation capacities, the listing of a scheme on any grid connection register, a planning database or a commercial contract register does not guarantee that the scheme will come forwards*." The 41MW project listed on the TEC register at Grendon Substation is not the Grendon Lakes Battery Storage Facility. The Grendon Lakes Battery Storage Facility (planning ref: NW/23/00360/FUL) is for the construction of a battery energy storage system with the ability to store and export up to 49.99 MW of electricity. There is no information available in the public domain about the 41MW solar and storage project and neither is there an identifiable planning application associated with it. Therefore the project cannot be assessed for cumulative effects. In May 2025, the TEC register listed a 1330MW BESS project connecting at Grendon substation. However, in October 2025 the connection point for this project has been moved to a new (as yet undefined) West Anglia Connection Node C 400kV Substation". The developer's website states that the project is in the early planning stage and no information is available in the public domain on which to assess any cumulative effects. The 1000MW connection (listed under Table 3 of the **Statement of Need [APP-556]**) for multiple technologies effective from 2033 remains listed on the TEC register at Grendon Substation. Similarly, there are no project details available in the public domain on which to base a cumulative assessment. ES Chapter 25: Cumulative Effects and Effects Interactions [APP-062] outlines the methodology for the assessment, which follows the Planning Inspectorate's Advice Note on Cumulative Effects Assessment. Accordingly, other existing and/or approved projects (including those at the scoping stage or within development plans) with publicly accessible information, such as entries on local authority planning registers or the Planning Inspectorate's website, have been considered. Proposals that are not in the public domain or lack associated details have not been included in the assessment as there is insufficient information to understand any likely cumulative environmental effects.

2.3 Design, parameters and other details of the proposed development

ExQ	Respondent	Question	Applicant's Response
Q3.0.1	The applicant	**Design parameters:** In the Concept Design Parameters and Principles document [APP-561] there appears to be no height restriction regarding the water storage structures on the proposed BESS sites should they be above ground, only a minimum capacity and commitment to slab foundation depth stated. Could a maximum height be added to work number 2(h) to provide some certainty regarding potential effects?	A maximum height of 3.5m can be applied to water storage containers at BESS sites. The **Concept Design Parameters and Principles Revision A [EX1/GH7.17_A]** has been updated to reflect this maximum height under Work No 2. The Applicant confirms that this has been considered within the envelope of the Environmental Impact Assessment presented in the **Environmental Statement [APP-037 to APP-064]** including the **Landscape and Visual Impact Assessment [APP-045]**.
Q3.0.2	The applicant	**Design options for panels** In Issue Specific Hearing 1 (ISH1), the ExA referenced the use of concrete feet for the panels that could not be fixed into the ground for reasons such as the presence of archaeological remains or unexploded ordnance (detailed in paragraphs 4.4.11, 4.4.12 and Plate 4.4 of the Scheme Description) [APP-041]. Whilst the ExA notes that detailed design matters will be somewhat dependent on the technology available at the time of construction, please could you provide information about other current options for fixing panels in these areas, if any?	As detailed in paragraph 12.7.9 of **ES Chapter 12 Cultural Heritage [APP-049]**, concrete feet are acknowledged as an archaeological mitigation strategy in the Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment, which also refers to planning guidance published by BRE (2013) and supported by Cornwall Council, which notes that: "*Where possible Solar PV arrays should be installed using 'pile' driven or screw foundations, or pre-moulded concrete blocks (shoes), and capable of easy removal. The use of shoes may be required for archaeological sensitive areas*." Concrete feet are currently the most common anchoring solution used to mitigate impacts to archaeology on solar farms as they do not require ground penetration. The Applicant is aware of shallower piling techniques, compared to traditional piling, that may serve as mitigation for archaeology. For instance, blade foundations use multiple metal poles, in place of one traditional pile, with thin steel plates or 'blades' at the end to secure them into the ground. A manufacturer has advised that the typical ground penetration depth for blade foundations is 0.5-1m. Their suitability for mitigation is therefore dependent on the burial depth of archaeology and ground conditions. The use of concrete feet as a non-intrusive mitigation option along with other piling techniques (i.e. 3 or 4-pin piles) is currently being discussed with the Northamptonshire County Archaeologist. Concrete feet are the preferred anchoring solution in areas of high-risk unexploded ordinance (i.e. on Green Hill G) as they do not require ground penetration. The Applicant is not aware of any large-scale solar farms currently deploying alternatives to concrete feet, such as blade foundations, and these emerging techniques are not yet a proven method for a project of this scale. The anchoring type will be considered at detailed design stage, having regard to the availability of the equipment and in conjunction with recommendations from the **Archaeological Mitigation Strategy [APP-146]** and the **Detailed Explosive Ordinance Risk Assessment within ES Appendix 22.1 Preliminary Geo Environmental Risk Assessment Part 7 of 7 Revision A [EX1/ GH6.3.22.1_A].**
Q3.0.3	The applicant	**Independent design review** Do you consider that the draft Development Consent Order (dDCO) should make a provision for the final design of the proposed development to be subject to an independent design review?	Good design has been embedded into the Scheme from the outset and the Applicant developed a framework for good design which was then used to inform the proposals from an early stage. Section 6.3 of the **Planning Statement [APP-559]** sets out the overall approach against the necessary policy requirements relating to design which includes NPS EN-1, NPS EN-3 and the National Infrastructure Commissions Design Principles for National Infrastructure. The strategic principles of the design of the Scheme are set out in the **Design Approach Document [APP-560].** The **Landscape and Visual Impact Assessment [APP-045]** further illustrates how good design remained at the core of the project design process and, in particular Table 8.7 details the Applicant's strategic approach to the design of the Scheme and embedded mitigation, having regard to the potential for effects to a wide range of environmental topics. The success of this approach to good

ExQ	Respondent	Question	Applicant's Response
			design is evident in Historic England (HBMCE)'s relevant representation dated 13 August 2025 [**RR-1228**] which states that "the site layout and landscaping proposal is clearly well thought out" and "careful consideration has been given, with a multidisciplinary approach taken regarding setting and indirect impact to designated heritage assets." The Applicant does not consider that there is a need for an independent design review of the final design, and notes that the PINS Advice calls for "well thought out mechanisms to enable design outcomes to be scrutinised, assessed and developed during the post-consent design process". An independent design review is one potential option, along with parameter plans, design codes, management plans and intentional community engagement. **ES Appendix 8.5 Landscape Consultation [APP-083]** provides detail of the extensive engagement that has informed the design of the Scheme. Requirement 5 of Schedule 2 of the **draft DCO Revision A [EX1/GH3.1_A]** requires the detailed design matters to be submitted and approved by the relevant local planning authority which will involve a level of scrutiny of the final detailed design. The design must be in accordance with the design parameters as set out in the **Concept Design Parameters and Principles (CDPP) Revision A [EX1/GH7.17_A]** which is secured in the DCO. The CDPP secures the worst case design of the Scheme that has been assessed within the Environmental Statement, which has achieved and secured a high level of good design within the outline design and, accordingly, this will be inherent in the detailed design. The Applicant considers that through the process of approving the DCO and the proposed requirements there is sufficient control and scrutiny without the need for an independent design review. The Applicant notes that the Secretary of State was satisfied with the approach taken on design for the Cottam Solar Project and the West Burton Solar Project (also developed by Island Green Power using the same framework for good design) and did not impose a requirement for an independent design review.
Q3.0.4	The applicant	**Design details in relation to the surroundings** The Scheme Description [APP-041] at paragraph 4.4.17 states "The external finish for the integrated containers will be in keeping with the prevailing surrounding environment." Are there other factors than the paint colour of green/light grey, that could assist in achieving this? Would light grey in particular be in keeping with the rural surroundings in many locations?	In accordance with the National Policy Statement for Renewable Energy Infrastructure (EN-3), design aspects such as the colour of generating station components should be selected to minimise visual impact on the landscape, insofar as engineering constraints allow. The updated **Concept Design Parameters and Principles Revision A [EX1/GH7.17_A]** confirm that for infrastructure elements including conversion units, inverters, transformers, switchgear, BESS, and control buildings, final colour choices will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction. These finishes will be carefully chosen in subdued, non-reflective tones to ensure the infrastructure integrates discreetly within the surrounding landscape. This amendment provides greater flexibility to the Applicant and the relevant planning authority (responsible for approving the design under Requirement 5 (detailed design approval) to the **draft DCO Revision A [EX1/GH3.1_A]**) to specify a colour choice that is appropriate to each location, noting that the previous specification of RAL 7004 (light grey) may be more visible in some landscapes than intended.
Q3.0.5	The applicant	**Grid connection radius** The Planning Statement [APP-559] states at 2.2.1 that the nine sites would be located within a 15km radius of the grid connection at Grendon Substation. However, the Development Site Chapter [APP-040] states at 3.3.1 that all of the sites lie within a 20km radius of the point of connection at Grendon Substation. Please confirm which is the case.	As set out in the **Pre-Examination Response to Section 51 Advice and Comments of the Planning Inspectorate: Cover Letter [PDA-001]** The Applicant has updated **ES Chapter 3: The Development Site Revision A [EX1/GH6.2.3_A]** to clarify the difference between the different area figures quoted and to ensure consistency on the difference between the radius to the Point of Connection which the Sites lie within and the area of search used in paragraph 3.3.1. The Applicant has also updated **ES Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]** to ensure consistency on the same points in paragraph 2.3.6.

2.4 The Environmental Statement (general)

ExQ	Respondent	Question	Applicant's Response
Q4.0.1	The applicant	**Lifespan of solar PV panels** Paragraph 4.6.18 of the Scheme Description [APP-041] states that it has been assumed that panels will be replaced once over the lifetime of the development. Is this a worse-case scenario? Please provide evidence to support this assumption.	As set out in **ES Chapter 4 Scheme Description Revision A [EX1/GH6.2.4_A]** the assumption that solar panels will be replaced once during the 60-year operational period is a worst-case scenario and is supported by manufacturer warranties which typically guarantee performance for 25-30 years. However, panels are known to continue to perform beyond the guaranteed timeframe and can remain functional well beyond 40 years. The Applicant will undertake a cost-benefit analysis during the operational lifespan of the Scheme to determine whether large scale replacement of panels would be advantageous. This is separate to ad-hoc replacement of defective or damaged panels which would be undertaken during regular maintenance activities as set out in **ES Chapter 4 Scheme Description Revision A [EX1/GH6.2.4_A]**
Q4.0.2	The applicant	**Replacement of solar PV panels** Paragraph 4.6.18 of the Scheme Description [APP-041] goes on to state that no intrusive ground works will be required as panels are being replaced. Does this mean that the frames the panels are mounted on and are fixed into the ground have a longer lifespan and will not need to be replaced?	The mounting structures will be designed with material specifications and corrosion protection to maintain structural integrity. Periodic inspections and preventive maintenance will be undertaken to ensure the structure's continued load-bearing capacity and corrosion resistance throughout the operational period. The mounting frames are expected to have a 40-year lifespan and with regular maintenance are anticipated to last longer. There is currently no data available as to the failure rate of equivalent mounting structures after 40 years. If ad-hoc replacement of the mounting frames is required, it could be undertaken without replacing the pile in the ground avoiding the need for extensive intrusive ground works.

2.5 Need

ExQ	Respondent	Question	Applicant's Response
Q5.0.1	The applicant	**Overplanting** Section 7.6 of the Statement of Need [APP-556] addresses the issue of overplanting, and confirms that overplanting is being considered for the proposed development. Paragraph 7.6.41 notes that an overplanting ratio of between 1.3 and 1.6 would be rational for this scheme. Could you provide an indication of what the overplanting ratio would be for the Illustrative Layout Plan [APP-193 to APP-206] as submitted? The ExA notes [APP-556] refers in the discussion of overplanting at paragraph 7.6.1 to an Indicative Landscape Masterplan (GH6.4.8.15.1 to GH6.4.8.15.5) which does not appear to have been submitted as part of the application. Does this reference require amendment?	The Illustrative Layout Plans **[APP-193 to APP-206]** as submitted represents a tracker scheme with an overplanting ratio of 1.3. This layout requires c.2.5 acres/MW(p), which is within the 'typical" range as stated at Para 2.10.17 of NPS EN-3 (2 to 4 acres / MMW). The Applicant notes that these plans are illustrative and, following consent (if granted) would be subject to revision at the detailed design stage. The Applicant confirms that the **Environmental Statement and Appendices [APP-037 – APP-544]** appropriately consider the environmental effects of the illustrative overplanted scheme (both panel configurations). Paragraph 7.6.1 of the Statement of Need should have referred to the **ES Illustrative Layout Plans** submitted as **GH6.4.4.1 to GH6.4.4.9.4 [APP-193 to APP-206]** ; however given the limited nature of this change, the Applicant considers that it does not materially alter the content of the **Statement of Need [APP-556]** and therefore does not propose to submit an updated version of the document.
Q5.0.2	The applicant	**Statement of Need omission** At paragraph 6.11.69 of your Statement of Need document [APP-556] there is a missing figure in the sentence "Once charged, a lithium-ion BESS is able to hold its charge without significant depletion (charge leakage) for a period of at least days…". Could you assist the ExA by informing us what the missing number of days is?	The Applicant confirms that there is no omission in Para 6.11.69 of the **Statement of Need [APP-556]**. An alternative wording for this paragraph, would be: "Once charged, a lithium-ion BESS is able to hold its charge without significant depletion (charge leakage) for a period of days or even weeks, meaning that BESS are easily able to import energy one day and export it the next.
Q5.0.3	The applicant	**Project performance** What are the consequences for the applicant of the project underperforming? How have you prepared for this possibility?	The Applicant is part of Island Green Power Limited (IGP), which is a leading developer of utility-scale solar projects and battery storage systems, established in 2013. IGP have delivered nearly 40 solar projects worldwide that have generated more than 3GW of energy capacity. This includes 21 solar projects in the UK. These range in size from below 5MW to Nationally Significant Infrastructure Projects (NSIPs) such as West Burton Solar Project and Cottam Solar Project (currently the UK's largest consented solar project) . The Applicant has drawn on this experience to ensure that Green Hill Solar Farm has been designed to provide sufficient flexibility to overcome performance challenges. The development of now operational solar projects and storage projects in Great Britain means that the technical and operational performance of these technologies is well understood, as is the anticipated annual output from operational schemes (see for example Paragraph 7.4.12 of the **Statement of Need [APP-556]**. The Applicant therefore considers that it is bringing forward a scheme which has a very high probability of performing as anticipated. As such, underperformance of the Scheme is not considered to be a significant risk to investment in or delivery of the scheme and the Applicant is making use of project planning and development practices which are appropriate for this scale of scheme. Such normal practices include, for example, the use of the Applicant's extensive experience in the delivery of large-scale ground mount solar schemes in Great Britain to inform the current project development timeline. Two of IGP's consented NSIP schemes (Cottam Solar Project and West Burton Solar Project) are currently progressing in step with their expected development timelines. Retaining flexibility in scheme design post consent (if granted) is another normal practice to ensure that the Applicant is able to use the most up to date technology and accommodate any opportunities available to it to deliver or improve upon the anticipated lifetime generation output of the Scheme within the envelope of development secured in the DCO. Maintenance activities required during the Scheme's operating life to sustain output have also been fully assessed as part of the project and the application for Development Consent.
Q5.0.4	The applicant	**BESS performance**	The Applicant expects that there may be slightly higher electrical losses between the grid and the Green Hill C Site than there would be between the grid and Green Hill BESS Site due to the greater

ExQ	Respondent	Question	Applicant's Response
		Paragraph 7.6.50 of the Statement of Need [APP-556] confirms that the proposed development includes AC-coupled BESS, which the applicant considers would be more suitable than DC-coupled BESS for practical and operational reasons. Paragraph 7.6.48 highlights that being close to the grid substation (presumably referring to Green Hill BESS Option A and Option B) minimises line losses for power flows for AC-coupled BESS. However, the proposed BESS at Green Hill C is some distance from the grid substation, so would an AC-coupled BESS in this location therefore be less efficient?	distances involved. The Applicant proposes to connect the northern part of the Scheme through the 400kV substation at the Green Hill C Site to the National Grid Substation at 400kV. Thus locating the BESS either close to the Green Hill C 400kV substation or the Green Hill BESS 400kV substation would minimise BESS-related losses. However, electrical losses are just one consideration in the BESS siting decision, and the Applicant does not consider that the marginally higher losses anticipated with siting BESS at Green Hill C would be significant enough to preclude development at that site. Additional details regarding the flexibility in siting BESS on Green Hill BESS and Green Hill C is further outlined in the **Written Summary of the Applicants Oral Submissions at the Issue Specific Hearing 1 and Responses to Action Points [EX1/ GH8.1.6]** under agenda item 3.3. Effects for Ecology and Biodiversity**.**

2.6 Site selection and alternatives

2.6.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

2.7 Air quality and emissions

2.7.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

2.8 Biodiversity, ecology and natural environment

ExQ	Respondent	Question	Applicant's Response
Q8.0.1	The applicant	**Methodology and survey results for functionally linked land** Natural England's representation includes questions about the surveying methodology and quantity of existing functionally linked land (FLL) associated with the Upper Nene Valley Gravel Pits Special Protection Area. Can the Applicant summarise how the FLL survey results have been approached.	To inform impacts on the Upper Nene Valley Gravel Pits Special Protection Area (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. Due to the later introduction of Green Hill F and G to the Scheme, these Sites were subject to a reduced scope of survey effort. The **ES Appendix 9.9 Wintering Bird Survey [APP-092]** and **Habitat Regulations Assessment (HRA) Revision A [EX1/GH7.21_A]** give full details of the survey scope and results. The **HRA Revision A [EX1/GH7.21_A]** sets out the rationale behind the interpretation of the survey results and the assessment of Functionally Linked Land (FLL). It then goes on to set out how the quantum of mitigation land required has been calculated, and describes the mitigation land provided by the Applicant. FLL was identified through confirmed pattern use of individual fields by significant numbers of qualifying species during the completed wintering bird surveys. Significant numbers were taken to be >1% of the species' population within the Special Protection Area, using the latest British Trust for Ornithology counts. 'Pattern use' was use of the fields by significant numbers of birds on more than one occasion during the completed surveys. The use of the field level as the scale for assessing FLL is justified in the **HRA [Revision A [EX1/GH7.21_A]**. Site land parcels (such as Green Hill F, for example) 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 fields are of a minimum size, and this minimum size requirement provides a consistency which is not present among the sizes of the wider Site 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 location and extent of identified FLL, as per the rationale above, is clarified in Section 7 of the **HRA Revision A [EX1/GH7.21_A]**; this comprises two fields. However, in lieu of two full seasons of survey effort across Green Hill F and G, additional fields within these Sites were considered for their potential to be FLL. As a precaution, any fields at Green Hill F or G where significant numbers of qualifying species were recorded on a single occasion (no pattern use) during the completed wintering bird surveys were classified as FLL. This comprised an additional four fields at Green Hill F. 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 approach taken by the Applicant is considered proportionate. Mitigation land is offered for all identified FLL and for all precautionary FLL. Natural England confirmed that mitigation need not be as simple as 1:1 in terms of area of land, and that favourable management of the mitigation fields may increase their value and so reduce the quantum needed. Nonetheless, the quantum of land offered as mitigation exceeds the combined quantum of confirmed and precautionarily assigned FLL. Selected mitigation fields are all of a size considered suitable for use by golden plover, and various other factors have been considered in their selection to ensure suitability. The assessment of FLL and provision of mitigation 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. However, the Applicant

ExQ	Respondent	Question	Applicant's Response
			can confirm that a meeting was held post-submission on 6th October 2025 between the Applicant's ecologist and Natural England, where the approach taken by the Applicant for the assessment was discussed. This was received favourably by Natural England, and consensus will be formalised in a Statement of Common Ground.
Q8.0.2	The applicant	**Mitigation suitability** FLL Mitigation Fields FF13 and FF16 would be close to panels to the west and partially bounded by roads or footpath. Mitigation Field BF1 would be adjacent to panels to the south and east. EF25, EF26, EF29 and EF30 would be close to panels. CF2 would be bounded on one side by a public bridleway (except for during periods of temporary closure for construction or maintenance). DF4 would contain a public footpath (except during periods of temporary closure for construction or maintenance). FF7 would be bounded on three sides by public footpaths (except for during periods of temporary closure for construction or maintenance). Please comment on the suitability of this mitigation in terms of the habitat suitability, context and proximity considerations referred to at Pages 4 and 5 of Natural England's representation.	The suitability of mitigation fields has been considered in light of various parameters. Firstly, all fields are of a size (above 8ha) which accords with the minimum size of fields confirmed to be used by target species during the completed wintering bird surveys. Proximity to footpaths and other forms of disturbance has been considered, along with the presence of tall vegetation, pylons and other structures. It is worth highlighting that all existing fields are enclosed by hedgerows, and the ultimate selection of any field for foraging is made in this context, such that foraging birds will be within an 'enclosed' area. The relative 'openness' of individual fields is a factor in selection, and this is a product of the field's size and shape, presence of tall boundary features, and any other internal features. All mitigation fields lie adjacent to proposed solar development. However, as discussed above, such fields will be distinct in the same way as fields are currently - with individual fields selected on the basis of their openness and other factors such as habitat type. The presence of solar infrastructure in adjacent fields is not considered likely to deter birds from utilising the mitigation fields. With regard to FF13 and FF16 specifically, these are partially bounded by a road and path, but are screened from both by hedgerows and will not be accessible to the public. Moreover, adjacent fields FF11 and FF5 are also bounded partially by roads and footpaths, but were confirmed to be used by qualifying species. The bridleway along the edge of CF2 is on the outer side of this field, and any riders and walkers would be screened by the field's boundary hedgerows. The presence of this bridleway is not considered to preclude use of the field by qualifying species. DF4 contains a footpath, and it is acknowledged that the presence of this path poses some risk of disturbance to birds using this field. However, DF4 has been included in the mitigation calculations as it is a large, open field, and may still be utilised in spite of the footpath's presence; this may be subject to levels of footfall. If felt necessary, DF4 can be removed from the mitigation land calculations; an excess of mitigation land is provided even in the event of DF4's removal from the mitigation land offering. FF7 is bounded by footpaths. However, the footpath along the northeastern edge is on the outward side of the field and screened by hedgerow. The other two footpaths bound the southeastern field corner, which is already more enclosed due to the shape of the field and less suitable for the qualifying species. The main, more open, body of the field to the northwest is considered sufficiently far from the footpaths to reduce the risk of disturbance to birds using it for foraging. Operationally, fields will be managed as arable or grassland habitats to provide suitable foraging habitat. FF7 is also proposed to have wader scrapes as an additional enhancement.
Q8.0.3	The applicant	**Natural England comments – Requirement 8** Please respond to Natural England's comments at Page 9 of its Relevant Representation [RR-1242] concerning requirement 8 of the draft development consent order.	Please refer to the Applicant's response to **NE-005** in **GH8.1.5 Applicant Responses to Relevant Representations [EX1/GH8.1.5].**
Q8.0.4	The applicant	**Draft protected species licences** Natural England requests the submission of draft protected species licences for review, where a Letter of No Impediment is required. Does the applicant intend to submit the draft licences?	Please refer to the Applicant's response to **NE-007** in **GH8.1.5 Applicant Responses to Relevant Representations [EX1/GH8.1.5].**
Q8.0.5	Natural England	**Habitat creation**	The Applicant notes that this question is not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		Natural England made representations concerning the quality and effectiveness of habitat creation intended to mitigate for the loss of functionally-linked land. Has Natural England reviewed the subsequent Outline Ecological Protection and Mitigation Strategy [APP-549], and does it have any further comments in this regard?	
Q8.0.6	The applicant	**Outline Ecological Protection and Mitigation Strategy – unredacted** Please send provide Natural England with an unredacted version of the Outline Ecological Protection and Mitigation Strategy [APP-549].	The **Outline Ecological Protection and Mitigation Strategy Revision A [EX1/GH7.5_A]** was not made available on the public examination library due to a confidential Method Statement. However, the Applicant can confirm that an unredacted version of this document has since been issued to Natural England for their review. An email with this document attached was sent to Natural England on 2nd September 2025, and receipt confirmed via email on 9th September 2025.
Q8.0.7	The applicant	**BESS firewater discharge** Would any necessary permit for the discharge of any firewater from the Battery Energy Storage System be applied for, if required?	The BESS drainage system is designed to contain all firewater within sealed and lined infrastructure sized for the 1 in 200-year rainfall event plus climate change allowance, as set out in the **Flood Risk Assessment and Drainage Strategy Annex J Revision A [EX1/GH6.3.10.11_A]** and the **Outline Battery Storage Safety Management Plan Revision A [EX1/GH7.7_A]**. Any retained firewater would be isolated, tested, and, if necessary, discharged via the authorised surface-water outfall only with the prior agreement of the Environment Agency or Lead Local Flood Authority. Such a release would occur under the site's existing Flood Risk Activity Permit (for a main-river outfall) or Land Drainage Consent (for an ordinary watercourse), or under a separate Environmental Permit secured at the time in accordance with the Environmental Permitting (England and Wales) Regulations 2016. No routine discharge of firewater is proposed or expected.
Q8.0.8	The applicant	**Firewater Disposal** Does the applicant have any comments on the Environment Agency's requested consistency update (RR-1224, EA/WQ/08) to the Outline Operational Environmental Management Plan [APP-546] regarding firewater disposal?	Please refer to the Applicant's response to **EA-008** and **EA-009** in **GH8.1.5 Applicant Responses to Relevant Representations [EX1/GH8.1.5].** The Applicant has confirmed that the **Outline Operational Environmental Management Plan Revision A [EX1/GH7.2_A]** will be updated to align with the provisions of the **Flood Risk Assessment and Drainage Strategy Annex J Revision A [EXQ/GH6.3.10.11_A]** and the **Outline Battery Storage Safety Management Plan Revision A [EX1/GH7.7_A]**. These documents confirm that the Battery Energy Storage System drainage is fully sealed and lined with isolation valves, enabling containment and testing of any retained firewater before either removal off-site by a licensed contractor or controlled release under the relevant Environment Agency authorisation. The agreed update to the **Outline Operational Environmental Management Plan Revision A [EX1/GH7.2_A]** will ensure full consistency across the submitted documents and reflect the position confirmed with the Environment Agency.
Q8.0.9	Environment Agency	**Check valves and fire safety** The Environment Agency requests (RR-1224, EA/WQ/02) that it is made clear in the documents that any check valves would be closed automatically in the event of a battery system fire. The Outline Battery Storage Safety Management Plan [APP-551] at 5.3.2 Page 32 states that in the event of a fire a system of automatically self-actuating valves would be closed and the Flood Risk Assessment and Drainage Strategy states the same [APP-103] at 2.8.3. Both of these documents would be secured by requirement and certified. Does this resolve the EA's concerns regarding the check valves?	The Applicant notes that this question is not directed at the Applicant.
Q8.0.10	The applicant	**Contamination** How would any contamination of the proposed gravel subbase beneath the BESS drainage system by firewater be managed (RR-1224, EA/WQ/03, EA/WQ/09) Can this procedure be added to the relevant documents?	The Applicant is not committing to a specific construction material beneath the Battery Energy Storage System (BESS) but to ensuring that the BESS drainage design provides full containment without infiltration to the underlying ground. The reference to a gravel sub-base in the **Flood Risk Assessment and Drainage Strategy Annex J Revision A [EX1/ GH6.3.10.11_A]** represents one feasible configuration used to demonstrate that an effective drainage and containment solution can be achieved within the site. The final design may include a liner, concrete slab, or other engineered system capable of achieving the same impermeable performance. As set out in the **Outline Battery Storage Safety Management Plan Revision A [EX1/GH7.7_A]**, the BESS drainage will form a sealed system that prevents infiltration to ground and ensures that any firewater is retained within the compound until tested and safely removed or released under the

ExQ	Respondent	Question	Applicant's Response
			appropriate Environment Agency authorisation. If a lined gravel sub-base or similar arrangement is used and contamination of that layer were to occur following an incident, the relevant management plan, such as the Operational Environmental Management Plan [APP-546] or detailed drainage management plan secured under Requirement 11 in Schedule 2 to the **draft DCO Revision A [EX1/GH3.1_A],** will require that any affected components of the drainage or containment system are inspected and, where necessary, cleaned, remediated or replaced before being brought back into use. This approach demonstrates a feasible drainage design for examination purposes while allowing flexibility at detailed design and ensuring that the BESS containment system remains fully impermeable.
Q8.0.11	The applicant	**BESS drainage and firewater systems** Please provide a response to the Environment Agency's request (EA/WQ/08) that documents (including [APP-035, APP-036, APP-047, APP-097, APP-551]) are updated to ensure that an impermeable lining to the BESS drainage and firewater capture systems is clearly set out.	The Applicant agrees with the Environment Agency's request to clarify that the Battery Energy Storage System (BESS) drainage and firewater containment systems will be impermeable. This position is already reflected in the **Flood Risk Assessment and Drainage Strategy Revision A [EX1/ GH6.3.10.1_A], the Flood Risk Assessment and Drainage Strategy Annex J Revision A [EX1/ GH6.3.10.11_A],** and the **Outline Battery Storage Safety Management Plan Revision A [EX1/GH7.7_A],** all of which confirm that the BESS drainage design will provide complete containment and prevent infiltration to ground. The reference to a lined system within these documents illustrates one method by which impermeability can be achieved. The commitment is performance-based and does not prescribe a specific material or construction detail. The final design may include a liner, concrete slab or other engineered system that achieves the same impermeable performance. To maintain consistency across the submitted documents, the Applicant will make minor drafting updates to the **Consultation Report Appendices [APP-035 and APP-036]**, the **Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A]**, and the **Outline Battery Storage Safety Management Plan Revision A [EX1/GH7.7_A]** to confirm that the BESS drainage and firewater containment systems will be impermeable. These updates will not alter the assessment findings or embedded mitigation already presented to the Examination.
Q8.0.12	The applicant	**Septic Tank Permitting** Has the applicant engaged with the Environment Agency regarding septic tank permitting? (see EA/WQ/04, 08 and 09 of the Environment Agency's Relevant Representation RR-1224).	Please refer to the Applicants response to EA-004 in **GH8.1.5 Applicant Responses to Relevant Representations [EX1/GH8.1.5]** The **Flood Risk Assessment and Drainage Strategy Revision A [EX1/GH6.3.10.1_A]** confirms that no foul connection to the public sewer is proposed. Foul water from welfare facilities will be managed by sealed septic tanks or package treatment plants designed in accordance with the EA's *General Binding Rules*. If a permit is required, it will be obtained from the EA at the detailed design stage. This approach is consistent with the EA's comments and will be reflected in the **Outline Operational Environmental Management Plan Revision A [EX1/GH7.2_A]** and the detailed drainage design secured under **Requirement 11 in Schedule 2 to the draft DCO Revision A [EX1/GH3.1_A]**.
Q8.0.13	The applicant	**Surface water and groundwater** The Hydrology and Flood Risk chapter [APP-047] defines the sensitivity of surface water and groundwater receptors as Medium. However, principal bedrock aquifer with a sensitivity of High-Medium according to 22.8.20 of the Ground Conditions and Contamination chapter [APP-059] underlies the site in some areas. As a principal aquifer the Blisworth Limestone Formation would be considered High Sensitivity according to Table 22.3 of [APP-059]. Please explain the factors which have been taken into account in its classification as High to Medium Sensitivity at paragraph 22.8.20 of [APP-059]. Furthermore, the Environment Agency (EA/WQ/05) states that the overall status of the Water Framework Directive groundwater bodies covering most of the site is Good (defined as High Sensitivity in Table 10.3 of Hydrology Flood Risk and	The difference in groundwater sensitivity terminology between **Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A]** and **Chapter 22: Ground Conditions and Contamination Revision A [EX1/GH6.2.22_A]** reflects phrasing rather than any inconsistency in baseline data or assessment approach. Both chapters recognise that the Blisworth Limestone Formation is a Principal Aquifer of high environmental importance but that the potential for impact from the Scheme is low due to the depth to groundwater, the presence of low-permeability superficial deposits, and the absence of groundwater abstractions or Source Protection Zones within or near the Order Limits. **Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A]** has been updated to confirm that Principal Aquifers are classed as High sensitivity, Secondary A and B Aquifers as Medium sensitivity, and Unproductive Strata as Low sensitivity, consistent with the

ExQ	Respondent	Question	Applicant's Response
		Drainage [APP-047]. Please explain whether you consider the assessment of groundwater sensitivity to be correct, in view of these considerations.	definitions presented in **Chapter 22: Ground Conditions and Contamination Revision A [EX1/GH6.2.22_A]**. This clarification does not change the findings or conclusions of the assessment, which already reflect the aquifer's high environmental value and the negligible risk of impact due to the Scheme's impermeable design and embedded mitigation measures. **Chapter 22: Ground Conditions and Contamination Revision A [EX1/GH6.2.22_A]** has also been updated to reflect Environment Agency Relevant Representation comments. Table 22.3 has been updated to define the sensitivity for aquifers. The assessment formerly contained 'Principal Aquifer – High Sensitivity', which has since been updated for consistency to include' Secondary A and Secondary B Aquifers as Medium Sensitivity' and 'Secondary Undifferentiated and Unproductive Strata as Low Sensitivity' – Aligning to the Hydrology Chapter Sensitivity Criteria. Please refer to the Applicants response to EA-015.
Q8.0.14	The applicant	**Ancient woodlands and Standing Advice** The Standing Advice for ancient woodlands states that development proposals should not be approved within an ancient woodland buffer zone, so as to avoid matters such as root damage. The Works Plan Revision A [AS-005] suggests that works within the ancient woodland buffer zones could include the creation of tracks, paths, cabling, fencing, earthworks and drainage systems and secondary construction laydown areas. Would any proposed works within the buffer zones form development which should not be approved within that zone, according to the Standing Advice?	The **Works Plan Revision B [EX1/GH2.4_B]** show the maximum extent to which each relevant work number is permitted to fall within. Whilst Works Numbers overlap with the ancient woodland buffer zones of Three Shires Wood, Horn Wood and Sywell Wood, precautionary measures have been secured to avoid certain development activities being undertaken within those buffer zones. These measures are explained below. The **Outline Ecological Protection and Mitigation Strategy Revision A [EX1/GH7.7_A]** states that a 30m ancient woodland buffer zone will be in place and that "*biodiversity protection fencing [BFP] should be installed in line with these buffer extents"*. It then goes on to state that "*During construction, no site personnel or machinery shall enter the Buffer Zones by crossing the BPF and no equipment will be stored therein. The only exceptions will be where access for essential/unavoidable operations have been agreed in advance with the EcoCoW* [Ecological Clerk of Works]*."* This measure therefore excludes development activity from the 30m ancient woodland buffer zone. The only exception is the 24m of access track within the buffer zone of Three Shires Wood and 840m of access track within Horn Wood's buffer zone (to be used during operation/decommissioning only). As explained in response to Q8.0.15, no dig hard surfacing will be installed if improvements to the existing tracks are needed for operation/decommissioning traffic. This no-dig surfacing will ensure no root impacts or ground disturbance within the buffer zone of the ancient woodlands. The Standing Advice referred to in the question states that "*A buffer zone should consist of semi-natural habitats such as: woodland; a mix of scrub, grassland, heathland and wetland"* and *"you can allow access to buffer zones if the habitat is not harmed by trampling"*. Given that the only work occurring within the ancient woodland buffer zones is no-dig hard surfacing which would not cause 'trampling' it is concluded that no proposed works within the buffer zones form development which should not be approved within that zone in accordance with the Standing Advice.
Q8.0.15	The applicant	**Ancient woodlands and machinery** The Forestry Commission raises concerns about the transporting of heavy machinery along access tracks during the operational phase causing root compaction of the ancient woodland. Are there provisions within the scheme which would prevent this?	The sections of access track (for use during operation/decommissioning) situated within any Veteran Tree/Ancient Woodland Buffer Zones will be constructed using a 'no-dig' solution and all excavation within Veteran Tree/Ancient Woodland Buffer Zones will be avoided - secured in the **Outline Construction Environmental Management Plan Revision A [EX1/GH7.1_A]** and **Environmental Statement Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171].** As stated in **Environmental Statement Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]**, 840m of access track is proposed within the ancient woodland buffer zone of Horn Wood and 24m of access track is proposed within the ancient woodland buffer zone of Three Shires Wood. These areas are already in use as tracks for farm machinery and compaction is already present. Nonetheless, the above mitigation in the form of no-dig

ExQ	Respondent	Question	Applicant's Response
			hard surfacing will be implemented to avoid any additional possible root impacts from soil compaction during the operation and decommissioning phases.
Q8.0.16	The applicant	**Pests and diseases** How would new trees and woodland avoid the introduction of pests and diseases (particularly in areas where there is ancient woodland)?	The **Outline Landscape and Ecological Management Plan Revision A [EX1/GH7.4_A]** includes the following provisions to avoid the introduction of pests and diseases from the planting and establishment of new trees and woodland: • All tree/hedgerow specimens will be native and of UK provenance. Trees will be locally sourced and of local provenance where practicable (paragraph 4.2.11); • All plants and planting operations are to comply with the requirements and recommendations of all current relevant British Standard specification, including but not limited to: BS 8545:2014. Trees: From Nursery to Independence in the Landscape (paragraph 4.2.4). BS 8545:2014 states that all purchased trees will be provided from the nursery with information on the nursery's pest and disease control programme; and • A wide variety of native tree species for woodland and individual tree planting are specified for planting within the OLEMP boosting the overall resilience of the planted tree stock to pests and diseases.
Q8.0.17	The applicant	**Ecology - Lighting design strategy** Please respond to North Northamptonshire's request [RR-1243] that a Lighting Design Strategy is produced in order to address potential effects on bats.	Where lighting is installed during the construction phase, this will be in accordance with the stipulations outlined in **Method Statement 4: Construction Phase Lighting** of the **Outline Ecological Protection and Mitigation Strategy [EX1/GH7.5_A].** A Lighting Design Strategy (taking into account the potential impacts of lighting on protected species) will be provided as part of the Detailed Construction Environmental Management Plan and Operational Environmental Management Plan post-consent, which are secured through Requirements 13 and 14 respectively in Schedule 2 to the **draft DCO Revision A [EX1/GH3.1_A]** and must be approved by the relevant planning authorities.
Q8.0.18	The applicant	**Ecology - Security and lighting** Security and lighting installations may affect the local ecology. For example, works around woodland (such as Works No. 6 around Horn Wood as shown on the Works Plan Revision A Sheet 16 [AS-005], and the draft development consent order [APP-017] may include CCTV columns. Would the location of pole mounted CCTV facilities be carefully considered to minimise their ecological impact? If so, how would this be secured?	CCTV columns are not anticipated to include luminaires, and therefore the location of pole mounted CCTV facilities around the offsite Horn Wood are unlikely to have any significant effect on the integrity of the woodland, or its suitability to support a range of nocturnal or light-averse species, such as bats. However, it is acknowledged that Works No. 6 does include the right to install lighting columns and lighting. Where lighting is installed during the construction phase, this will be in accordance with the stipulations outlined in **Method Statement 4: Construction Phase Lighting** of the **Outline Ecological Protection and Mitigation Strategy Revision A [EX1/GH7.5_A]** which provides that security lighting may be installed on temporary site compounds and permanent structures following consultation with the Ecological Clerk of Works, a suitably qualified ecologist with at least five years' relevant experience, to establish appropriate locations. A Lighting Design Strategy (taking into account the potential impacts of lighting on protected species and measures to minimise these) will be provided as part of the Detailed Construction Environmental Management Plan and Operational Environmental Management Plan post-consent, which are secured through Requirements 13 and 14 respectively in Schedule 2 to the **draft DCO Revision A [EX1/GH3.1_A]** and must be approved by the relevant planning authorities.
Q8.0.19	The applicant	**Ecology – Badger surveys** Please comment on the adequacy of badger surveys, further to North Northamptonshire Council's RR [RR-1243].	Please refer to the Applicant's responses to **NNC-034** and **NNC-035** in **GH8.1.5 Applicant Responses to Relevant Representations [EX1/GH8.1.5].**
Q8.0.20	The applicant	**Habitat Management**	Details of the management and monitoring of retained, created and enhanced habitats are provided in the **Outline Landscape and Ecological Management Plan Revision A [EX1/GH7.4_A]**. These measures would be secured through **Requirement 7 - Landscape and Ecological Management**

ExQ	Respondent	Question	Applicant's Response
		How would the management of created and enhanced habitat be secured for the lifetime of the scheme?	**Plan** in Schedule 2 to the **draft DCO [EX1/GH3.1_A]**. Similarly, **Requirement 9: Biodiversity Net Gain** secures the delivery of a minimum of 10% biodiversity net gain in habitat units, hedgerow units and watercourse units. A breach of any requirement in the DCO, or the measures contained in any approved management plan, would constitute a criminal offence. This ensures that compliance with the plans is maintained for the lifetime of the Scheme.
Q8.0.21	The applicant	**Hedgerow trees management** Please explain why an annual inspection and prune in the Outline Landscape and Ecological Management Plan [APP-548] Appendix A would not be carried out for hedgerow trees on an ongoing basis.	**Section 4.3: Native Hedgerows and Hedgerow Trees** of the **Outline Landscape and Ecological Management Plan (OLEMP) Revision A [EX1/GH7.4_A]** specifies that newly planted hedgerow trees will be subject to an inspection and formative prune annually in Years 1-5, in accordance with good arboricultural practice to BS 3998:2010. Once established thereafter, it is anticipated that hedgerow trees will require little maintenance as they will be well-rooted, and will be allowed to grow to their natural height and shape. The overall health and structure of hedgerows and associated trees will be assessed as part of the Ecological Monitoring visits as outlined in **Section 5: Ecological Monitoring** of the **OLEMP Revision A [EX1/GH7.4_A]**, and any remedial measures or changes to management required would be identified and communicated back to the management contractor.
Q8.0.22	The applicant	**Cable Route** Please provide any available update on whether the cable route directly affects Earls Barton Meadow, further to North Northamptonshire Council's RR [RR-1243].	Please refer to the Applicant's response to **NNC-031** in **GH8.1.5 Applicant Responses to Relevant Representations [EX1/GH8.1.5].**
Q8.0.23	The applicant	**Timing of tree surveys** Please respond to North Northamptonshire Council's request [RR-1243] that the identification of trees at risk from felling is completed at least a full survey season in advance of any works/felling required.	Please refer to the Applicant's response to **NNC-043** in **GH8.1.5 Applicant Responses to Relevant Representations [EX1/GH8.1.5].**

2.9 Habitat Regulation Assessment

ExQ	Respondent	Question	Applicant's Response
Q9.0.1	The applicant	**HRA – Worst case parameters** The Habitats Regulations Assessment (HRA) Report [APP-565] does not set out the parameters in relation to what has been assessed as worst case and how this is justified. The Applicant should confirm and justify the worst-case parameters that have been used in the HRA Assessment.	The worst-case parameter applied throughout the **Habitats Regulations Assessment (HRA) Revision A [EX1/GH7.21_A]** is the threshold for determining Likely Significant Effects during the initial Screening stage. Section 3.3 of the HRA highlights that the Applicant's HRA operates on the principle that the 'Likely' Significant Effects identified are not necessarily 'probable', but that there is a 'risk' or 'possibility' of significant effects. As a result, the Test of Likely Significant Effects is based on a reasonable worst-case. A key consideration in determining the worst-case scenario in respect of the assessment is the locations and extents of the BESS sites, due to the proximity of BESS units to the Upper Nene Valley Gravel Pits Special Protection Area (SPA) and potential risk of discharge of contaminated water into the SPA in the event of battery fire. For the purposes of the HRA, the maximum extent of BESS at Green Hill BESS - i.e. design Option A was therefore used, which has a slightly greater extent of BESS in field BESS2 than design Option B. A precautionary approach to the assessment of Functionally Linked Land at Green Hill F and G (given the slightly lower scope of wintering bird surveys completed at these parcels) was also taken. This approach aims to establish a reasonable worst case scenario with regard to the extent of FLL in lieu of the missing surveys, and levels of mitigation land provided within the Scheme has been founded on this approach.
Q9.0.2	The applicant	**Decommissioning** Paragraph 2.1.3 of the HRA Report [APP-565] states that the underground cables are anticipated to be decommissioned in situ to minimise environmental impacts. However, paragraph 4.7.3 of ES chapter 4 [APP-041] also describes removing cables by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place. Please confirm how this approach to decommissioning has been assessed within the HRA Report and how this affects the assessment outcomes.	The Applicant notes this comment, and confirms that, as described in Paragraph 4.7.3 of **ES Chapter 4 Scheme Description Revision A [EX1/GH6.2.4_A],** cables may either be left in-situ or removed, in accordance with the applicable guidance and regulations at the point of decommissioning. Paragraph 2.1.3 of the **HRA [APP-565]** will be amended to accord with the optionality described in **ES Chapter 4 Scheme Description [GH6.2.4]**. This will be amended in the updated version of the **HRA [EX1/GH7.21_A]**, to be submitted at Deadline 1. The updated HRA assesses the removal of cables as the likely worst-case scenario, with impacts for decommissioning being assessed as comparable to the construction phase. The Applicant can confirm that the assessment outcomes detailed in the HRA are unchanged.
Q9.0.3	Natural England	**HRA sites and features** Are you satisfied that the correct sites and features have been identified in the applicant's HRA Report [APP-565]?	The Applicant notes that this question is not directed at the Applicant.
Q9.0.4	The applicant	**SPA FLL survey methodologies** In their relevant representation [RR-1242], Natural England (page 4) raised concern regarding the survey methodologies for the SPA Functionally Linked Land (FLL). Please set out the rationale explaining how survey results have been interpreted; including an explanation of how the land has been divided, how the functionality has been assessed and how these elements link to inform the overall conclusion.	The Applicant understands that Natural England are not concerned with the Applicant's survey methodology; the survey scope and methodology has been agreed through discussion, and on page 3 of the relevant representation **[RR-1242]**, Natural England state "we are content with the number of surveys conducted". The matter under discussion is the rationale behind interpretation of the surveys in respect of identifying Functionally Linked Land (FLL). The approach taken by the Applicant has been fully detailed in the **Habitat Regulations Assessment Revision A [EX1/GH7.21_A]** and is also set out in the detailed response to **ExQ1 8.0.1**. The Applicant can confirm that a meeting was held post-submission on 6th October 2025 between the Applicant's ecologist and Natural England, where the approach taken by the Applicant for the assessment was discussed. This was received favourably by Natural England, and consensus will be formalised in a Statement of Common Ground.
Q9.0.5	Natural England	**In-combination effects methodology** Are you satisfied with the Applicant's methodology for the assessment of in-combination effects set out in the HRA Report [APP-565]?	The Applicant notes that this question is not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
Q9.0.6	The applicant	**SPA and Ramsar qualifying features** Please provide a table listing all the qualifying features for the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site and what impact pathways they have been screened against.	The Applicant can confirm that impacts on all qualifying features have been assessed under each potential impact pathway within the **Habitat Regulations Assessment [APP-565]**. An updated version of the **HRA Revision A [EX1/GH7.21_A]** which contains the requested summary table will be submitted at Deadline 1.
Q9.0.7	Natural England The applicant	**Ecological Protection and Mitigation Strategy** Relevant representation [RR-1242] states that you did not have access to the Ecological Protection and Mitigation Strategy [APP-549]. Please advise whether your concerns regarding mitigation set out in relevant representation [RR-1242] remain valid now that a redacted version of this document is available [AS-011]. Please *[can the Applicant]* provide Natural England with an unredacted version of the Ecological Protection and Mitigation Strategy [APP-549].	The **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-549]** was not made available on the public examination library due to a confidential Method Statement. However, the applicant can confirm that an unredacted version of this document has since been issued to Natural England for their review. An email with this document attached was sent to Natural England on 2nd September 2025, and receipt confirmed via email on 9th September 2025.
Q9.0.8	Natural England	**Visual and noise disturbance** It is unclear whether the assessment of disturbance to designated species includes visual disturbance as well as noise disturbance within section 6.2 of the HRA Report [APP-565]. Please confirm whether you have any comments to this regard.	The Applicant can confirm that the HRA **[APP-565]** discusses the risks of both visual and noise disturbance under the headings relating to 'Disturbance to Designated Species'.
Q9.0.9	Natural England	**Invasive non-native species (INNS)** Paragraph 6.3.6 of the HRA Report [APP-565] states that due to the lack of major development to watercourses upstream of the SPA, the spread of invasive non-native species (INNS) is unlikely to be compounded by other developments and no in-combination effects from this impact pathway are likely. Please confirm whether you agree that the spread of INNS is not considered in Stage 2 in-combination assessment.	To clarify, this is paragraph 6.3.5.
Q9.0.10	Natural England	**Conservation objectives and condition assessment** Paragraph 5.2.26 of the HRA Report [APP-565] states that no current information on the conservation measures for the Upper Nene Valley Gravel Pits Ramsar site is available and a formal management plan has not been prepared. However, the HRA Report does provide a list of measures that have been proposed to address current impacts to the Upper Nene Valley Gravel Pits Ramsar site. No information on the current condition of the Upper Nene Valley Gravel Pits Ramsar has been provided. Paragraph 5.2.27 states that "no current condition information was available". Please confirm: a) what conservation objectives should be used for the assessment of the Upper Nene Valley Gravel Pits Ramsar site. b) whether the Upper Nene Valley Gravel Pits SPA condition assessment also applies to the Ramsar site.	The Applicant notes that this question is not directed at the Applicant.

2.10 Compulsory acquisition, temporary possession and other land or rights considerations

ExQ	Respondent	Question	Applicant's Response
Q10.0.1	The applicant	**Meeting the conditions under section 122 of the PA2008 in respect of Order Limits** The ExA notes the inclusion of land within the Order Limits to facilitate aspects of the proposed development such as landscaping for screening and biodiversity and ecology provision, however this would lead to the acquisition of fields that are not intended to be used for electricity generation, Having regard to: • the provisions of section 122 of the PA2008, most particularly the condition stated in section 122(2)(a) that the land "...is required for the development to which the development consent relates", and • Paragraph 11 of the "Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land" (Department for Communities and Local Government, September 2013) (CA Guidance), stating "...the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is not more than is reasonably required for the purposes of the development." Please explain how the powers sought would meet the conditions stated in section 122 of the PA2008.	Section 122 of the PA2008 provides that a development consent order may include provision authorising compulsory acquisition of land only if the conditions in subsections (2) and (3) are met. The conditions in (2) are that the land is:(a) required for the development to which development consent relates, (b) required to facilitate or is incidental to that development, or (c) is replacement land. The condition in (3) is that there is a compelling case in the public interest for the land to be acquired compulsorily. The Applicant considers that the tests for compulsory acquisition in section 122 of the PA 2008 are satisfied. The "development to which the development consent relates" refers to the entirety of the authorised development set out in Schedule 1 to the draft DCO. Section 122(2)(a) therefore applies to both the development for which "development consent is required" (s115(1)(a) of the PA 2008) and any associated development (s115(1)(b) of the PA 2008). As set out in the **Explanatory Memorandum Revision A** [**EX1/GH3.2_A**], associated development includes landscaping, biodiversity and ecology measures. In addition, land or rights may be acquired where this is needed to facilitate or is incidental to the development, in addition to where it is directly required for the development itself (section 122(2)(b) of the PA 2008). The areas of landscaping, biodiversity and ecology provision form part of the authorised development and are required to make the generating station acceptable in planning terms, and therefore meet the test in section 122(2). The Scheme seeks to minimise or mitigate its adverse impacts to an acceptable degree, through the measures identified as necessary in the **Environmental Statement** [**APP-037 to APP-064]** which include landscaping and biodiversity provision. The test in section 122(3), that there is a compelling case in the public interest for the acquisition of the land is also met. The **Statement of Reasons** [**APP-019**] sets out the rationale for the land subject to compulsory acquisition, demonstrating that there is a compelling case in the public interest. The **Land and Rights Negotiations Tracker Revision A** [**EX1/ GH4.4_A**] provides further detail about the status of negotiations with landowners for the land and rights required for the Scheme. The Applicant has secured option agreements for the land forming the main solar sites, with the land in the cable route corridor required to connect the generating station on the sites Green Hill A – G to the National Grid. Compulsory acquisition powers are included in the event agreement cannot be reached for the land and rights required for the Scheme, or in the event there is some reason, such as insolvency, meaning an agreement falls away.
Q10.0.2	The applicant	**Book of Reference:** NGET's relevant representation [RR-1240] highlights incorrect references to NGET in your Book of Reference (BoR) [APP-021] where interests relate instead to National Grid Electricity Distribution (NGED). Can you confirm that the BoR will be amended accordingly and that you will be engaging with NGED as necessary?	The Applicant has updated the **Book of Reference Revision B [EX1/GH4.3_B]** for Deadline 1 to clarify NGET and NGED interests. This includes registered interests and the interests identified by NGET within their response to Relevant Representation **[EX1/GH8.1.5]**.

ExQ	Respondent	Question	Applicant's Response
Q10.0.3	The applicant	**Progress of Land Rights Negotiations and Heads of Terms** The ExA notes from the detailed land and rights negotiations tracker in [APP-022] that there are many draft Heads of Terms which were under discussion with the relevant landowners. Please could you provide an update as to the progress of these and, if necessary, an updated Land and Rights Negotiation Tracker [APP-022].	The Applicant has been negotiating Voluntary Agreements with 34 parties, of which 8 have been signed with solicitors instructed, with 26 ongoing agreements. A full update is provided in the **Land and Rights Negotiation Tracker Revision A [EX1/GH4.4_A]**.
Q10.0.4	Affected Persons and Interested Parties	**Statement of Reasons and Land Plans** Are any APs or IPs aware of any inconsistencies in the Statement of Reasons [APP-019] or Land Plans [APP-007]? If so, please set out what these are and provide details.	The Applicant notes that this question is not directed at the Applicant.

2.11 The draft Development Consent Order (DCO)

ExQ	Respondent	Question	Applicant's Response
Q11.0.1	The applicant	**Contents table** There is no table of contents – could one be added into the next iteration of the dDCO.	This has been added in **Revision A** of the **draft DCO [EX1/GH3.1_A]**.
11.1: Articles			
Q11.1.1	The applicant	**Article 2 (Interpretation)** "address" includes any number or address used for the purposes of electronic transmission. As Article 46 (Services of notices) is the only article referencing "address" and provides clarity with respect to electronic transmission, why is it necessary to list address in Article 2?	The definitions in article 2 apply to the whole of the Order, including the Schedules. Whilst the term "address" is not used in the articles, it is used in a number of the Protective Provisions within Schedule 15.
Q11.1.2	The applicant	**Article 20 (Authority to survey and investigate land)** In Article 20 of the dDCO [APP-017] "any land which may be affected by the authorised development" seems quite a broad term. The article would give the undertaker various powers to carry out works over such land. How would "land which may be affected" be determined? The consent of the highway authority would be required to carry out such works on highway land but the power is broad, relating to any land, and may include land subject to a right of public access but which is not highway, such as common land. There is no requirement to leave such holes in a safe state, or to fill them in and make them safe once completed. How would the undertaker ensure such holes did not present a risk to the public, or to anyone else using the land?	This article is consistent with other recently consented solar DCOs, including the East Yorkshire Solar Farm Order 2025 and the Tillbridge Solar Order 2025. The ability to enter land that may be affected by the authorised development reflects that article 20 provides a power to survey and investigate land. It is broad in scope to reflect that surveys may be needed to monitor noise and ensure safe construction practices. For example, to assess ground conditions for Horizontal Directional Drilling (HDD), it may be necessary to use this power to survey land adjacent to the intended HDD area, to ensure any increased risk of adverse effects is identified and avoided/mitigated. This will help inform the Applicant as to whether any protective works are required, for example under article 19 (protective works to buildings). Any surveys or investigations to land over which the public has an existing right of access would not restrict those public rights of way. Any trial holes or boreholes made in the course of the investigation would be made safe, as this forms part of the survey process. In accordance with the Borehole Sites and Operations Regulations 1995 ("BSOR 1995"), Regulation 7, no borehole operation may commence until the operator has prepared a Health and Safety Document. This document must demonstrate that risks to persons at work have been assessed under the Management of Health and Safety at Work Regulations 1999 (MHSWR). In addition the document should be developed to identify potential hazards to anyone who may be affected by drilling activities, and set out the procedures and controls necessary - in order to protect both the workforce and members of the public. Once boreholes are no longer required, it is advised that they are decommissioned in line with Environment Agency guidance (Environment Agency, October 2012, Good practice for decommissioning redundant boreholes and wells) and good practice – this may be by backfill or sealed appropriately, with headworks removed and the ground reinstated to minimise residual risk. Additionally, the article provides that the Applicant must give 14 days' notice before exercising the powers of entry, and that compensation is payable for any loss or damage caused.
Q11.1.3	The applicant	**Article 31 (Temporary use of land for constructing the proposed development)** Article 31(4) states that the undertaker must not remain in possession of any land under this article after the end of the period of one year beginning with the date of completion of the part of the authorised development for which temporary possession of land was taken. Can the applicant please explain why it believes that one year is a reasonable timeframe?	This is approach is consistent with other recently consented solar DCOs such as the West Burton Solar Project Order 2025, the East Yorkshire East Yorkshire Solar Farm Order 2025, and the Tillbridge Solar Order 2025. One year following the date of final commissioning is widely accepted to be a reasonable timeframe to return the land to the owner. This timeframe provides sufficient time to pack down construction compounds and to complete remedial works to restore the condition of the land, recognising that the restoration of land may include seasonally dependent works such as planting, whilst ensuring that the Applicant may not remain in possession of the land for an unreasonably long period of time.
11.2: Schedule 2 – Requirements			
Q11.2.1	The applicant	**Interpretation** The Interpretation to Schedule 2 – Requirements in the dDCO [APP-017] names the three relevant planning authorities. Given the proposed 60-year period of operation of the proposed development,	Article 2(7) of the **dDCO** [**EX1/GH3.1_A**] states that, when interpreting the draft DCO, "references to any statutory body include that body's successor bodies." It is therefore not necessary to make individual references to future or replacement bodies within the remainder of the draft DCO.

ExQ	Respondent	Question	Applicant's Response
		should this also include text to the effect of "and any successor" to cover the event of any future local government reorganisation?	
Q11.2.2	The applicant	**Requirement 5 (Detailed design approval)** The first sub-paragraph of requirement 5 in the dDCO [APP-017] is missing the numeral (1), given that subsequent sub-paragraphs are numbered (2) to (4) – please amend.	This has been corrected in **Revision A** of the **draft DCO [EX1/GH3.1_A]**.
Q11.2.3	The applicant	**Future proofing of names of organisations** Given the proposed 60-year period of operation of the proposed development, should provision be made in requirements should the titles of organisations change in future? Requirement 6 for example means the local planning authority must consult with the Northamptonshire Fire and Rescue Service and the Environment Agency. Requirement 7 includes consultation with Natural England. Should something like "or an equivalent body if superseded" be added, to cover such an eventuality?	Article 2(7) of the **dDCO** [**EX1/GH3.1_A**] states that, when interpreting the draft DCO, "references to any statutory body include that body's successor bodies." The interpretation rules in article 2 also apply to the Schedules, and it is therefore not necessary to make reference to successor bodies on an individual basis. The Applicant has, however, amended the Requirements that refer to Natural England to instead refer to the 'relevant nature conservation body', to provide clarity that it is Natural England in its capacity as the nature conservation body that is relevant to the Requirements.
Q11.2.4	The applicant	**Requirement 17 (Operational noise)** Requirement 17 of the dDCO [APP-017] sets out that an Operational Noise Management Plan will be submitted for approval prior to commencement of Work Nos. 1, 2 and 3, noting this will incorporate operational mitigation measures set out in the outline Operational Environmental Management Plan (oOEMP). Given that for other control documents, for example under requirements 13 to 16, the applicant has taken the approach of submitting an outline plan for each with the application, to which the final version must be substantially in accordance with, explain why a different approach has been taken in respect of requirement 17 and comment whether an outline Operational Noise Management Plan should be prepared and submitted.	A separate management plan for operational noise is not considered necessary, as until the detailed design is undertaken, it is not known what operational noise mitigation will be implemented in practice to ensure the noise levels do not exceed those assessed in the Environmental Statement. The outline Operational Environmental Management Plan confirms the mitigation considerations for the detailed design, and the Requirement secures approval of that design by the relevant planning authority. By contrast, where a Requirement refers to an outline version of a plan, this is where a substantial suite of mitigation measures have been identified as applying in all, or some identified, scenarios.
Q11.2.5	The applicant	**Enforceability of requirements** In various requirements, for example R6(2), R7(2), R8(2), R13(2), final versions of plans to be submitted for approval are required to be substantially in accordance with the outline versions of the plans certified under Schedule 13 of the dDCO. Does the applicant consider that the term "substantially" is sufficiently precise for the purposes of enforcement?	The term "substantially in accordance with" is used to provide the flexibility needed for the plans to be developed in accordance with the greater level of detail that will be known at a later stage and to take account of any technological improvements. It is considered that requiring strict adherence to an outline scheme reduces flexibility for the final scheme to respond positively to issues arising during the detailed design phrase. Further, requiring a final scheme to be "substantially in accordance with" the outline scheme does not mean that the discharging authority is bound to approve *any* scheme that is substantially in accordance with the outline version. Instead, the discharging authority would retain an ability to refuse any scheme that was insufficient, regardless of whether it was in accordance with or substantially in accordance with the submitted outline scheme. Paragraph 2(4) of Schedule 16 requires the Applicant to submit a statement when applying for approval of a final management plan confirming that it does give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement and if it will then it must be accompanied by information setting out what those effects are. This ensures that the discharging authority is fully aware of the implications of any changes from the outline management plans. Any enforcement of compliance with the Requirements when carrying out the Scheme would be made against the final approved detailed management plans, which remains unaffected by the use of the phrase "substantially in accordance with". The use of "substantially in accordance with" in this context is well precedented, including in the recent West Burton Solar Project Order 2025, the Tillbridge Solar Order 2025 and the East Yorkshire Solar Farm Order 2025.
11.3: Schedule 13 – Documents and Plans to be Certified			
Q11.3.1	The applicant	**Omission**	This has been added in **Revision A** of the **draft DCO [EX1/GH3.1_A]**.

ExQ	Respondent	Question	Applicant's Response
		The Outline Construction Traffic Management Plan [APP-553] appears to be missing from Schedule 13 – Documents and Plans to be Certified, can this be added to the list of documents and plans to be certified.	
Q11.3.2	The applicant	**Typographical error** The Archaeological Mitigation Strategy document reference is incorrectly stated as GH6.2.12.6 and should be amended to GH6.3.12.6.	This has been corrected in **Revision A** of the **draft DCO [EX1/GH3.1_A]**.
11.4: Explanatory Memorandum			
Q11.4.1	The applicant	**Typographical error** Paragraph 4.6.17 of [APP-018] incorrectly refers to the Arbitration Rules section of the dDCO as Schedule 15, when these are at Schedule 14 – please correct.	This has been corrected in **Revision A** of the **Explanatory Memorandum [EX1/GH3.2_A]**.
Q11.4.2	The applicant	**Typographical error** Paragraph 5.6.1 of [APP-018] incorrectly refers to "public rights of way to be temporarily closed (Part 1)", which needs amending to "streets to be temporarily closed (Part 1)".	This has been corrected in **Revision A** of the **Explanatory Memorandum [EX1/GH3.2_A]**.

2.12 Historic Environment

ExQ	Respondent	Question	Applicant's Response
Q12.0.1	The applicant	**Omission** ES Chapter 12 [APP-049] in Table 12.28: Summary of Significant Residual Effects for Cultural Heritage under the Operational Phase section of the table, in the Receptor column the words "Conservation Area" are missing after "Easton Maudit" and "Mears Ashby" – could this omitted text be added for clarity.	Easton Maudit Conservation Area and Mears Ashby Conservation Area are the receptors listed in the Operational Phase section of Table 12.28 of **ES Chapter 12: Cultural Heritage** [**APP-049**]. Given the limited nature of this change, the Applicant considers that it does not materially alter the content of **ES Chapter 12: Cultural Heritage [APP-049]** and therefore does not propose to submit an updated version of the document.
Q12.0.2	Historic England	**Setting of designated heritage assets** In relation to the comments in your relevant representation [RR-1228] regarding the settlements of Mears Ashby, Walgrave and Old, can you clarify that the proposed mitigation has satisfied your earlier concerns, or is there more to be done?	The Applicant notes that this question is not directed at the Applicant.
Q12.0.3	Historic England	**Registered Park and Garden of Castle Ashby** Your RR [RR-1228] in respect of the proximity of the Grade I Registered Park and Garden of Castle Ashby to the proposed development notes the topography and proposed screening would reduce the setting impact. Does this alleviate your concerns regarding the impact on setting, or is there more you expect from the applicant?	The Applicant notes that this question is not directed at the Applicant.
Q12.0.4	Host local authorities	**Conservation Area Character Appraisals** The host local authorities are requested to provide the ExA with character appraisals, if available, for the four Conservation Areas scoped in to the applicant's assessment: • Castle Ashby Conservation Area; • Easton Maudit Conservation Area; • Grendon **Conservation Area; and** • Mears Ashby **Conservation Area.**	The Applicant notes that this question is not directed at the Applicant.

2.13 Climate Change

ExQ	Respondent	Question	Applicant's Response
Q13.0.1	The applicant	**Life cycle analysis** When calculating the benefit in reducing greenhouse gas (GHG) emissions from the proposed development, can the applicant confirm whether or not they took into consideration the GHG emissions due to manufacture, transport and disposal of the solar panels (including their replacement), as part of a life cycle analysis assessment.	As set out in section 7.8 of the **Environmental Statement Chapter 7: Climate Change [APP-044],** GHG emissions due to manufacture, transport, and disposal of solar panels have been considered as part of the life cycle analysis assessment, including replacement. This was achieved through examining the emissions factors for these processes using a combination of sources, primarily the DESNZ Government Conversion factors and the Inventory of Carbon and Energy (ICE) Database.
Q13.0.2	The applicant	**Individual panel efficiency during operation** What process and procedures will the applicant have to continually assess the performance of individual panels and then to ensure they are performing at the optimal level?	As stated in the **Environmental Statement Chapter 4: Scheme Description [EX1/GH6.2.4_A**] in paragraph 4.6.5 site monitoring will be undertaken remotely. On-site performance data will be continuously monitored via Supervisory Control and Data Acquisition (SCADA) link, this is common practice for solar farms. The services of a third-party Operations and Management specialists are often contracted to provide monitoring, reporting and remedial works and this will be determined during the pre-construction period.
Q13.0.3	The applicant	**Recycling Strategy** Does the applicant have a recycling plan for damaged and inefficient panels and battery storage components. If so, does this plan include containment and safe disposal of potentially harmful substances?	As detailed within paragraphs 24.4.67 through 24.4.73 of the **Environmental Statement Chapter 24 Other Environmental Matters [EX1/GH6.2.24_A]** and section 2.9 of the **Outline Operational Environmental Management Plan (OEMP) [EX1/GH7.2_A],** a Waste Management Strategy will be developed as part of the OEMP to ensure operational waste is managed suitably. Approval and implementation of the OEMP is secured by Requirement 14 of the dDCO. All waste management will comply with relevant regulations, and waste will be transported by licensed hauliers to authorized waste management sites with the necessary permits for the consigned wastes. Infrastructure such as PV panels and battery storage units that need to be replaced during the operational phase, will be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time, or if more suitable at the time, sold for refurbishment and reuse.

2.14 Land use and soils

2.14.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

2.15 Glint and Glare

ExQ	Respondent	Question	Applicant's Response
Q15.0.1	The applicant	**Typographical Error** In paragraph 15.4.16 of Chapter 15: Glint and Glare [APP-052], there appears to be an error where it should refer to Table 15.4. Can this be amended and checked that there is no further text missing?	The Applicant can confirm that the error in paragraph 15.4.16 of ES **Chapter 15: Glint and Glare [APP-052]** is a referencing error and should refer to Table 15.4. The Applicant also confirms that no further text is missing. Given the limited nature of this change, the Applicant considers that it does not materially alter the content of the **ES Chapter 15: Glint and Glare [APP-052]** and therefore does not propose to submit an updated version of the document.

2.16 Landscape and Visual

ExQ	Respondent	Question	Applicant's Response
Q16.0.1	The applicant	**Index to all Landscape and Visual Documents:** At ISH1, it was raised by an interested party that the Landscape and Visual ES Documents were difficult to navigate. Please could an index of these documents and their contents be provided?	The following Landscape and Visual Impact Assessment Appendices have been indexed to provide greater accessibility. • **ES Appendix 8.2_Scoping LVIA Receptor Sheets Revision A [EX1/ GH6.3.8.2_A]; and** • **ES Appendix 8.3_ES LVIA Assessment Sheets Revision A [EX1/GH6.3.8.3_A].**
Q16.0.2	The applicant, Host Authorities and relevant Statutory Consultees	**Planting Growth Rates** During ISH1, the applicant explained that, for the purposes of the assessments in relation to planting and visual screening, a uniformed growth rate of 0.4m per year, leading to a minimum height of 7.5m in 15 years had been applied. Is this a reasonable rate and are relevant parties content with this assumption?	The 0.4m per year growth rate has been calculated based on professional experience and through consultation with national nurseries such as Hilliers. This rate has been applied in other similar projects and is common practice to apply in Landscape and Visual Impact Assessment. The 0.4m growth rate is considered reasonable to give a uniform worse case average across the 15-year establishment period, with expected growth rates considered in actuality to be greater. However, it is likely that growth rates could fluctuate year on year depending upon external factors such as climate and weather, and so the 0.4m growth rate is used to provide a uniform worse case average. The **Outline Landscape and Ecological Management Plan Revision A [EX1/GH7.4_A]** sets out the framework for the planting, management and monitoring of landscape mitigation. The OLEMP is secured through Requirement 7 of the draft DCO.
Q16.0.3	Host Authorities	**Viewpoint and Photomontage Locations** Are you satisfied that the viewpoints and photomontages provided to date identify the key landscapes and viewpoints that are representative of sensitive visual receptors and that they identify appropriate visual receptors? If not, please indicate which other views or areas should be included in the viewpoints and photomontages and why.	The Applicant notes that this question is not directed at the Applicant.

2.17 Noise and Vibration

2.17.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

2.18 Battery Energy Storage System (BESS)

ExQ	Respondent	Question	Applicant's Response
Q18.0.1	The applicant	**Battery Storage Safety Management Plan** In the Outline Battery Storage Safety Management Plan (oBSSMP) [APP-551] there is an inconsistency in relation to bodies to be consulted on the BSSMP. The introduction refers at paragraph 2.2.2 to consultation with Northamptonshire Fire and Rescue Service (NFRS) and the Environment Agency (EA). However, the concluding paragraph 7.1.4 only refers to NFRS. Can paragraph 7.1.4 be amended to include the EA, so that it is consistent with the wording of requirement 6 of the dDCO.	The Applicant notes the request and has updated Paragraph 7.1.4 to also include reference to the Environment Agency, the amended **Outline Battery Storage Safety Management Plan Revision A [EX1/ GH7.7_A]** has been submitted as part of Deadline 1.
Q18.0.2	The applicant	**Northamptonshire Fire and Rescue Service comments on Green Hill C BESS** Noting the comments of Northamptonshire Fire and Rescue Service in [RR-1245] regarding improvements they consider necessary at Green Hill C BESS, will you be working with NFRS to amend the proposed layout of this site accordingly?	The Applicant emailed Northamptonshire Fire and Rescue Service (NFRS) on the 16th October with Green Hill C site plans incorporating proposed passing places and NFRS operation area, for feedback and approval. The Applicant is planning to submit the agreed Green Hill C site plan together with a signed **Statement of Common Ground** with Northamptonshire Fire and Rescue Service **[EN010170/APP/GH8.3.8]** at Deadline 2.
Q18.0.3	The applicant	**BESS fire safety** You will be aware that a number of RRs have been made expressing concerns about fire safety risks associated with the provision of BESS within the proposal. What are the levels of risk, are there examples of fires from such systems elsewhere in the UK or worldwide? For example, as a newer form of technology are they currently more risky infrastructure than, say, existing electricity substations that have been long established?	The Applicant emphasises that the safety risks of BESS are well established and understood in 2025; the Electric Power Research Institute (EPRI) BESS Failure Incident Database (Ref 1.2)was established in 2021 as an information tool for both energy storage industry stakeholders and the public, providing insights into the systems that have experienced incidents. Statistically, the significant global increase in BESS deployments means that there will be a likely increase in the number of failure events. However, BESS failure rates dropped by 98% from 2018 to 2024 as lessons learned from BESS failure events have been incorporated into BESS design, testing requirements, control and monitoring systems, safety standards, and construction and operations best practices. New testing requirements, safety reports, safety standards and codes published in 2025 will ensure that failure rates and incident consequences will continue to reduce, a non-exhaustive list includes: NFPA 855 (2026): Standard for the Installation of Stationary Energy Storage Systems, UL 9540A (2025): Standard for Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems, CSA / ANSI C800:25: Testing protocol for energy storage system reliability and quality assurance program, European Association for Storage of Energy (2025): EASE Guidelines on Safety Best Practices for Battery Energy Storage Systems, IEEE 2686 (2025) standard: Recommended Practice for Battery Management Systems in Stationary Energy Storage Applications, and Clean Energy Associates (2025): BESS Quality Risks - A summary of the most common Battery Energy Storage System manufacturing defects of 2024. Electric Power Research Institute (EPRI), *Insights from Battery Energy Storage Systems (BESS) Failure Incident Database: Analysis of Failure Root Cause (Ref 1.3)*, identified four primary root causes of BESS failure with the majority occurring in early lifecycle stages i.e. construction, commissioning, or within two years of operation. The Applicant emphasises that the EPRI research concluded that the primary cause of failure was rarely the battery cells or modules, and the **Outline Battery Storage Safety Management Plan (OBSSMP) Revision A [EX1/ GH7.7_A]** is drafted to address all key safety risk reduction topics to ensure that comprehensive BESS fire and explosion hazard prevention and mitigation strategies can be developed and implemented to ensure there are no significant offsite impacts. Furthermore, at ISH 1 the Applicant confirmed that as mandated in NFPA 855 (2026) published in September 2025, at the detailed design stage the selected BESS will have undertaken Large Scale

ExQ	Respondent	Question	Applicant's Response
			Fire Testing (LSFT) 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. LSFT of the selected BESS design is conducted to establish minimum equipment spacing distances (no fire propagation to adjacent BESS or infrastructure) and site-specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with Northamptonshire Fire and Rescue Service (NFRS). The **Outline Battery Storage Safety Management Plan (OBSSMP) Revision A [EX1/ GH7.7_A]** key safety risk reduction content which ensures levels of risk are minimised and fully mitigated, is contained in the following sections listed below: • Section 2: 2.3 Potential BESS Failure, 2.4 Safety Objectives, and 2.5 Relevant Guidance. • Section 4: BESS safety requirements through the lifecycle of the Scheme including: Battery System Enclosure design (4.1.23 - 4.1.28), Detection and Suppression Systems (4.1.29), Explosion prevention and control systems (4.1.30), 4.2 Safe BESS Construction, and 4.3 Safe BESS Operation and decommissioning. • Section 5: All aspects of NFRS potential firefighting considerations for the Scheme including Emergency Response Planning and Risk Management template requirements. • Section 6: Pre-Construction Information Requirements. The Applicant will provide including key Risk and Hazard Mitigation Analysis studies listed in Sections 6.1.3, 6.1.4, and 6.1.5.
Q18.0.4	The applicant	**BESS safety and height parameters** Appendices 10.6 and 10.11, sections 2.8 of the Flood Risk Assessment [APP-097] describe a number of additional mitigation measures that have been proposed for the BESS and substation. These include raising equipment by a minimum of 150mm above surrounding ground levels and adequately waterproofing BESS and substation infrastructure. Paragraph 2.8.4 states that all batteries will be located within areas above the 0.1% AEP flood extent, and where this isn't possible, batteries will be raised 0.6m above the 0.1% AEP flood level or as "*high as practicable*". Please confirm whether the minimum of 150mm above ground levels has been taken into account in the maximum height parameters assessed within the Environmental Statement.	As stated within **Chapter 10 Hydrology, Flood Risk and Drainage Revision A [EX1/GH6.2.10_A]** '*Critical infrastructure within the Scheme (the conversion units, substations and energy storage compounds) are sequentially located within Flood Zone 1 and therefore in land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) - this is detailed in the supporting Outline Landscape and Ecological Management Plan (OLEMP) [EN010170/APP/GH7.4]*'. Considering this, BESS units will not require raising of 0.6m. The 150mm allowance refers to the small plinths that are required to support critical infrastructure, this is embedded within the maximum parameters set out within the **Concept Design Parameters and Principles Revision A [EX1/GH7.17_A].**

2.19 Socio-economics effects

ExQ	Respondent	Question	Applicant's Response
Q19.0.1	The applicant	**Permissive access** It was submitted at Issue Specific Hearing 1 that clarification of the route of the annual Waendel Walk will be provided. The outline Construction Environmental Management Plan [APP-545] (the oCEMP) states at Page 45 that permissive access would be made available for the Waendel Walk through Field FF19 during construction. Looking at the Landscape and Ecology Mitigation Plan – Site F Sheet 1 [APP-216], is the proposed permissive access for the walk shown through Field FF19 by the purple dashes? Where is the proposed Waendel Walk permissive access secured, as it does not appear to be mentioned in the oCEMP [APP-545]?	The Applicant confirms that the route of the International Waendel Walk Saturday 42K route, requiring permissive access through Field FF19, is demarcated by the light purple dashed line on **ES Figure 4.17: Landscape and Ecology Mitigation Plan F – Sheet 1 [APP-216]** and **ES Figure 4.18: Landscape and Ecology Mitigation Plan F – Sheet 2 [EX1/GH6.4.4.18_A]**, where it falls within the Order Limits. Please note, this is not shown as a formal permissive path on the Works Plans [**EX1/GH2.4_B**] as, unlike Work Nos. 10A and 10B, this route will be open to the public by permission for the purposes of the International Waendel Walk only. The Applicant confirms that this has been updated in the **Outline Construction Environmental Management Plan Revision A [EX1/GH7.1_A]** submitted at Deadline 1, and arrangements for the International Waendal Walk during construction are therefore secured through Requirement 13 in Schedule 2 to the **draft DCO [EX1/GH3.1_A]**. During the operational phase of the Scheme, this route will be located outside of the fence line, and may continue to be used for the International Waendal Walk.
Q19.0.2	The applicant	**Permissive access – construction** The outline Public Rights of Way and Permissive Access Plan [APP-554], 4.2.15 states that the permissive access for the Waendel Walk would be available during the Scheme's operational lifetime, but does not include the construction period. The oCEMP (Page 44) [APP-545] states that if it is considered that access cannot be safely provided for the walk, the operators would discuss whether alternative arrangements can be made with the Council. These considerations introduce some uncertainty regarding whether the walk would be able to go ahead during construction. What would prevent decisions regarding the walk being made at a late stage, potentially damaging its reputation due to late cancellation, with a resulting negative impact on tourism and local businesses?	The Applicant confirms that the **Outline Public Rights of Way and Permissive Paths Management Plan Revision A [EX1/GH7.10_A]** secures access through the east of FF19 throughout the operational lifetime of the Scheme, based on the 2025 'Saturday 42K' route provided by Wellingborough Town Council to the Applicant at Section 42 statutory consultation. The **Outline Construction Environmental Management Plan Revision A [EX1/GH7.1_A]** contains precautionary wording as the 'Saturday 25K, 27K and 42K' routes all interact with the Order Limits (at Green Hill F, Green Hill BESS, and along the Cable Route Corridor at Easton Lane, the River Nene, and at byway open to all traffic NN|TC|14) and therefore could be subject to construction works. The text therein commits to providing access along the existing permissive and public routes (highways and PROWs) as the default position, with alternative arrangements to be sought within the Order Limits to enable the event to continue should any works to the existing permissive and public routes be required to be undertaken during the event weekend. Discussions of alternative arrangements with Wellingborough Town Council should be taken as early as possible in the annual event organisation schedule with any agreement made no later than 31st March of each year, to ensure late-stage considerations do not interrupt the organisation of the event.
Q19.0.3	The applicant	**Construction phasing** The potential construction duration for Site F in the Transport Assessment Part 1 of 3 [APP-151] at 4.3.2 is Month 1 to Month 23, so that two annual Waendel Walks could be affected. Is there any potential to phase the construction so that it avoids the need for preventing access for the walk (17.7.4 of the Socio-Economics, Tourism and Recreation chapter [APP-054] seems to envisage this). If so, where would this be secured?	The Applicant confirms that the potential for two International Waendel Walk events may be affected by the construction of the Scheme. Phasing of construction work is secured through the **Outline Construction Environmental Management Plan Revision A [EX1/GH7.1_A]** submitted at Deadline 1, and is therefore secured through Requirement 13 in Schedule 2 to the **draft DCO [EX1/GH3.1_A]**. However, this is in respect to phasing across the entirety of the Scheme rather than specific locations of events. Whilst there may be some scope for phasing of works to avoid the International Waendel Walk event weekends, this is not practicable to secure at this point, as a detailed construction schedule for all Works on the Scheme is not known. The International Waendel Walk event could be affected by works at Green Hill F, including cabling works at access CR23, Green Hill BESS, and along the Cable Route Corridor at the River Nene crossing, and on byway open to all traffic NN|TC|14. The Applicant considers that the requirement to make access available for the International Waendel Walk event, and to discuss and agree alternative arrangements with Wellingborough Town Council should existing permissive and public access routes be unsafe, is sufficient to ensure the construction of the Scheme does not impede the running of the International Waendel Walk.
Q19.0.4	The applicant	**Permissive access – private hacking routes**	The Applicant confirms that specific permissive access routes outside the Order Limits have not been assessed, particularly where there is no public record of them. The Applicant has however assessed the impact on the equestrian facilities at Top Lodge Farm, Villa Farm, and Chequers Lane, all of

ExQ	Respondent	Question	Applicant's Response
		Relevant Representation [RR-1254] from Trinity Land Ltd regarding Villa Farm Livery, Easton Maudit states that the proposed development has not taken the effect on their private permissive hacking routes into account. Please confirm whether the considerations raised are addressed in the scheme documents.	which are understood to be within the landholding of Trintiy Land Ltd. None of these facilities are anticipated to experience significant adverse effects as assessed in **ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [EX1/GH6.3.17.1_A]**. The Applicant infers these comments refer to fields to the northwest of Green Hill F, adjoining the Grendon Brook. Whilst no assessment on hacking routes in these fields has been undertaken, the Applicant directs attention to **ES Figure 4.17: Landscape and Ecology Mitigation Plan F – Sheet 1 [APP-216]** and **ES Figure 4.18: Landscape and Ecology Mitigation Plan F – Sheet 2 [EX1/GH6.4.4.18_A]**, which demonstrate the extent to which solar arrays are offset from Grendon Brook by landscape, ecology, and flood risk mitigation measures. No solar infrastructure is proposed for fields FF7, FF8, FF9, the southern end of FF10, or FF14. Solar Infrastructure in FF3 and FF10, which would be most visible to the inferred hacking routes, is offset from users due to existing vegetation, hedgerows, the Grendon Brook itself, and offsets from footpath NN|TF|11 / NN|TA|1.

2.20 Transport and Traffic

ExQ	Respondent	Question	Applicant's Response
Q20.0.1	The applicant	**Consultation – National Highways** At Issue Specific Hearing 1 National Highways requested its inclusion as a consultee on Requirement 18 (public rights of way and permissive paths), as public rights of way matters may affect the Strategic Road Network. The applicant stated in response that the requirement for the planning authority to consult with "the relevant highway authority" before approving the public rights of way and permissive paths management plan would include National Highways. Please provide further details of how the requirement would provide for consultation with National Highways on the plan.	Requirement 18 of the **draft DCO Revision A [EX1/GH3.1_A]** requires that the relevant planning authority "must consult with the relevant highway authority" before approving the detailed construction traffic management plan. The relevant highway authority will be the highway authority responsible for the highways affected by the plan. Notwithstanding the Applicant's position that the relevant highway authority will inherently include National Highways where appropriate, a review of public rights of way (PRoW) that may be affected by the Scheme has identified that there is only one PRoW in the vicinity of the strategic road network. This is a byway open to all traffic (BOAT), reference TC/014. This BOAT crosses the A45 on a bridge and provides vehicular access to Earls Barton Mill. There is a route which is open to non-motorised vehicles along Station Road which leaves Earl Barton to the south and goes under the A45 and links into Grendon Road/Station Road. This does not have a formal designation but is open to all non-motorised vehicles so for completeness the Applicant has included it. The Applicant has updated the **Public Rights of Way and Permissive Paths Management Plan Revision A** [**EX1/GH7.10_A**] to require consultation with National Highways on any proposed temporary closure of these routes.
Q20.0.2	The applicant	**Construction routes – component delivery** Is the source of components to be delivered known? If so, have potential routes from these sources been assessed? If not, what would prevent (for example) HGV drivers using different routes from those identified? A response states that the outline Construction Traffic Management Plan [APP-553] (oCTMP) sets out that construction routes must be used unless otherwise agreed by the relevant highway authority: could you direct us to where this is set out in the Plan?	The source of components to be delivered are currently unknown, however it is assumed that deliveries will be transported to the vicinity of the Scheme utilising the Strategic Road Network. The HGV routing strategy set out in the outline Construction Traffic Management Plan (**oCTMP)** Revision A **[EX1/GH7.9_A]** is for HGVs to route via the Strategic Road Network and then A-roads. In the near-vicinity of the site, the HGV routes between A-roads and the site accesses are set out in and secured by Section 4 of the submitted **oCTMP** Revision A **[EX1/GH7.9_A]**. A Delivery Management System will be put in place which includes allocating drivers with a slot arrival time, instructing the driver on which access to use and the construction routes to follow for each delivery, as set out in Paragraph 5.5.2 of the **oCTMP Revision A [EX1/GH7.9_A]**. The following amendments have been made to the **oCTMP Revision A [EX1/GH7.9_A]**, as detailed in **oCTMP Revision A [EX1/GH7.9_A]** to further strengthen the approach to HGV route compliance: 1) Banksman at each site access will record the direction HGVs arrive from. Any that do not arrive from the direction adhering to the HGV routes will be recorded and any instances of non-compliance will be raised with the relevant contractor. Potential corrective actions have been added to the **oCTMP Revision A [EX1/GH7.9_A]** at paragraph 5.13.3 (e.g. additional signage on HGV routes, improvements to the communication strategy, replace HGV drivers if there are repeat breaches, suspend delivery booking slots to contractors that repeatedly breach HGV routes until corrective action taken). If necessary, the issues will be discussed with the relevant local highway authority to make them aware of corrective action taken as set out in paragraph 5.12.1 in the **oCTMP Revision A [[EX1/GH7.9_A],]**. 2) A telephone line will be set up for members of the public to report suspected breaches of the HGV routes which will be investigated and addressed with the relevant contractor. This is set out in section 5.11, Community Engagement, and paragraph 5.13.2 of the oCTMP Revision A **[EX1/GH7.9_A].**
Q20.0.3	The applicant	**Construction haul routes – AIL**	Due to site constraints, such as the need to avoid harm to ecological habitat or to minimise disruption to major roads, there will be a need for horizontal directional drilling (HDD) in certain locations, as set out in the **Crossing Schedule** [APP-562]. Where HDD is used, this creates a

ExQ	Respondent	Question	Applicant's Response
		Could construction haul routes within the proposed development be used for Abnormal Indivisible Loads (AIL)?	'gap' in the cable corridor haul road that sits above ground which prevents the use of internal construction haul routes to inter-connect between sites. This also means it is not possible for construction haul routes to be used for Abnormal Indivisible Loads (AILs). As such, the AILs have been assessed as accessing the site via the public highway network, as set out in **Appendix 13.2 of the Transport Assessment (Parts 2 and 3)** [APP-152 & APP-153].
Q20.0.4	The applicant	**Highway safety – schools** A route passing Grendon primary school is proposed for use by construction worker vehicles and light goods vehicles. A representation (Stop Green Hill Solar [RR-1248] describes the road at that point as a narrow lane, and raises concerns about a lack of mitigation for peak school times. Similar concerns were raised at Issue Specific Hearing 1. The oCTMP [APP-553] states that construction worker shift patterns would avoid travel between 0800-0900, and between 1700-1800. The earlier period would presumably avoid affecting traffic at drop off times at the school. However, the later period would not avoid school pick up times. How would the scheme seek to minimise the scope for conflicts between highway users and to protect highway safety on Main Road, Grendon?	No HGVs will route through Grendon village. HGVs will be required to travel on the HGV routes, set out within Section 4 of the **oCTMP Revision A [EX1/GH7.9_A]**. However, there may be a limited number of worker movements routing through Grendon. Grendon primary school is located on Main Road in Grendon. This road has a 30mph speed limit and a footway on at least one side of the road for its length. It is recognised that the road is narrow in sections. Typically, where a road is narrow, this reduces traffic speeds further, below the 30mph speed limit. There is existing signage in place warning of the primary school, located on the junction by Chequers Lane. There have been no recorded personal injury collisions on Main Road in the last 5 year period. Generally, construction workers will be working a long, single shift. The **oCTMP Revision A [EX1/GH7.9_A]** states that the construction worker shift patterns would avoid travel between 08:00-09:00, and between 17:00-18:00. The **oCTMP Revision A [EX1/GH7.9_A]** further strengthens this to advise workers to avoid routing through Grendon during school drop off and pick up hours (i.e. 08:00-09:00 and 15:00-16:00). The Applicant considers that this is sufficient to minimise the scope for conflicts between highway users and to protect highway safety, as informed workers will typically take alternative routes to avoid periods where Main Road is likely to be busy with school-related activity. In addition, the **oCTMP Revision A [EX1/GH7.9_A]** sets out a number of measures to manage construction traffic, including: Shuttlebuses will be used to transport construction workers and workers travelling by car will be encouraged to car share in order to reduce the number of construction worker cars on the highway network as set out in Section 6.2 of the **oCTMP Revision A [EX1/GH7.9_A]**
Q20.0.5	The applicant	**Construction Compound** The construction compound off Yardley Road, Grendon is referred to as both CC4 in the Transport and Access chapter [APP-050] paragraphs 13.5.5, 13.8.23, 13.8.26 and CC3 [APP-050] paragraph 13.6.39. Which is correct please. 2.6.2 of oCTMP [APP-553] states CC4). Can the documents be updated for consistency.	CC4 is correct. Paragraph 13.6.39 of **ES Chapter 13 Transport and Access [APP-050]** should read as follows: ***'Cable Route Corridor Route - Green Hill BESS to Green Hill F and Construction Compound 4*** *The Cable Route Corridor continues from the eastern boundary of Green Hill BESS, heading south towards Green Hill F. The Cable Route Corridor passes through agricultural fields following the alignment of Station Road, crossing Station Road. The route continues south, again running across agricultural fields and adjacent to Construction Compound 4, where it crosses Yardley Road and through agricultural fields before entering Green Hill F.'* This will be updated as part of an updated **ES Chapter 13 Transport and Access [APP-050]** to be submitted at Deadline 2, which will provide more clarity on HGV, worker and AIL routes and accesses.
Q20.0.6	Cogenhoe and Whiston Parish Council	**AIL movements – Cogenhoe** At Issue Specific Hearing 1 the applicant confirmed that five abnormal indivisible loads only are proposed through Cogenhoe, and that they will provide further information or signposting in relation to the suitability of the route through the village for these trips. Following review of	The Applicant notes that this question is not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		the further information or signposting, can the Parish Council confirm whether it wishes the requested site visit to the village to proceed.	
Q20.0.7	The applicant	**Construction traffic – cable drums** Journeys by cable reel trailer to deliver cable drums in the Transport and Access chapter [APP-050], 13.8.29 do not appear to be included in construction traffic forecast. Please explain whether this is the case and, if so, the reason for their exclusion. (Also 7.2.4 of the oCTMP [APP-553] states that a cable reel trailer is classed as an abnormal load and that "multiple deliveries will be required across the Cable Route Corridor" but does not appear to confirm that these journeys have been included in the transport assessment forecasts).	The **ES Appendix 13.2Transport Assessment [APP-151]** assessed a total of 33 HGV deliveries associated with the cable corridor (66 two-way HGV movements) across the 3 construction compounds on a peak day. The peak, and this number of deliveries, is associated with the construction of the haul road along the route of the cable corridor. The haul road will be put in place in advance of trenching works and the delivery of cable drums and the laying of the cabling. The forecast peak cable drum deliveries on a single day will total 12 deliveries (24 two-way cable drum movements) spread across the cable corridor. This is less than the number of HGVs assessed for the construction of the cable corridor haul roads and therefore the assessment is considered robust.
Q20.0.8	The applicant	**Construction Workers' Travel Plan** Please provide an update on progress with the Construction Workers' Travel plan. How would compliance with the proposed plan be secured given that it is not referred to in the draft Development Consent Order?	The **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** submitted at Deadline 1 has provided clarification on how the Construction Worker Travel Plan would be secured. Paragraph 6.3.1 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** requires that the Construction Worker Travel Plan is submitted to the local highway authorities for their approval prior to commencement of construction. Requirement 15 in Schedule 2 to the **draft DCO Revision A [**EX1/GH**3.1_A]** provides for the detailed CTMP to be substantially in accordance with the outline CTMP, and for it to be approved by the relevant planning authority prior to construction. The Construction Worker Travel Plan, being required by the oCTMP, must form part of the detailed CTMP to be approved. It is therefore also secured by Requirement 15 of the **draft DCO Revision A [EX1/GH3.1_A]**.
Q20.0.9	The applicant	**Highway safety – Bozeat** Please explain (or signpost to an explanation of) how the proposed development would seek to minimise the scope for conflicts between highway users and to protect highway safety where traffic associated with it would use residential streets in Bozeat village.	The assessment set out in **ES Chapter 13 Transport and Access [APP-050]** assesses London Road / Easton Lane (link 81) in Bozeat, used to access Access-F-2 and CR23. The speed limit on the residential part of London Road/Easton Lane is 30mph. Residential properties are to the east of London Road and south of Easton Lane. There is a footway provided on one side of the carriageway within the residential area. There has been 1 slight personal injury collision in the last 5 years. London Road/Easton Lane is on an HGV route and would also potentially be used by some workers to access the sites. **ES Chapter 13 Transport and Access [APP-050]** assessed a peak of 8 two-way HGV movements per day routing along London Road/Easton Lane, as well as 64 two-way worker movements per day (combination of cars and shuttlebuses). The **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** sets out the following measures to manage construction traffic: - Shuttlebuses will be used to transport construction workers and workers travelling by car will be encouraged to car share in order to reduce the number of construction worker cars on the highway network as set out in Section 6.2 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. - Construction traffic will be managed outside of network peak hours as set out in the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** paragraph 5.5.1 for HGV deliveries and paragraph 6.1.2 for worker shift patterns. - A delivery management booking system will be utilised to manage the flow of HGVs on the network, with drivers allocated a time slot for deliveries, as set out in Section 5.5 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**.

ExQ	Respondent	Question	Applicant's Response
			- Wheel washing facilities will be provided at each access to ensure that mud and debris is not transferred to the public highway as set out in Section 5.6 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. - Temporary route signage will be provided on the HGV routes, which will support adherence to the routes as well as warn other road users of construction traffic as set out in Section 5.7 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. In summary, during the reasonable worst case peak of the construction phase, there would be a limited number of construction vehicle movements routing on London Road/Easton Lane in Bozeat. The road is a low speed road with provision for non-motorised users and does not have a history of accidents. It is considered that the measures set out in the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** would minimise the scope for conflicts between highway users and protect highway safety. The assessment in the **ES Chapter 13 Transport and Access [**APP-050**]** shows that there will be no significant adverse transport effects in Bozeat.
Q20.0.10	The applicant	**Highway safety – vulnerable road users** Please explain (or signpost to an explanation of) how the proposed development would protect the safety of more vulnerable users such as pedestrians and cyclists where traffic associated with it would use the following streets in or near Earls Barton: Station Road, Grendon Road, Mears Ashby Road, Doddington Road and Mill Lane.	The assessment in **ES Chapter 13 Transport and Access [**APP-050**]** concludes that there will be no significant adverse transport effects along these routes: - Station Road – Link 74 - Grendon Road – Link 74 - Mears Ashby Road – Link 48 - Doddington Road – Link 83 - Mill Lane is a byway accessed via CR-14. **Grendon Road and Station Road** Grendon Road and Station Road form part of a proposed HGV route and would also be used by construction worker traffic. During the reasonable worst case construction peak, Grendon Road and Station Road (link 74) have been assessed for 30 two-way HGV movements per day and 82 two-way worker movements per day (cars and shuttlebuses combined). Grendon Road is subject to a 40mph speed limit which changes to a derestricted speed limit as the road becomes Station Road. There have been 2 recorded personal injury collisions (PICs) resulting in a serious injury and a fatality in the most recently available 5 years' worth of data. In both cases, the reason given for the collisions are that a vehicle was on the wrong side of the road resulting in a head on collision. There have been no recorded PICs involving vulnerable road users. Grendon Road is not in a residential area and there are no footways adjacent to the road. Earls Barton Spinney Quarry is located on Grendon Road, which generates HGVs. Station Road is subject to a derestricted speed limit. Along Station Road there has been a single PIC resulting in a slight injury during the last 5 years. Station Road is not in a residential area. There are a number of companies served from Station Road, including vehicle repairs, a trucking company, concrete supplier and a quarry. In addition, Station Road provides access to White Mills Marina and the Pioneer Sportsground. There is a footway on one side of the carriageway along the northern section of Station Road between Grendon Road and the bridge over the River Nene. South of the River Nene there is no footway provision on Station Road. A public right of way (PRoW) routes along the River Nene towpath and the footway along Station Road connects the PRoW along the River Nene. It is not a residential area and there are limited pedestrian/cycle trip generators on Grendon Road/Station Road. Based on site visits and desktop research, pedestrians primarily route along the PRoW on the River Nene towpath and only interact with Station Road for a short section via a

ExQ	Respondent	Question	Applicant's Response
			footway on the eastern side of the carriageway in order to continue on the PRoW. Based on Strava data, Grendon Road and Station Road are utilised by leisure cyclists but do not form part of any designated cycle route. The **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** sets out the following measures to manage construction traffic: - Shuttlebuses will be used to transport construction workers and workers travelling by car will be encouraged to car share in order to reduce the number of construction worker cars on the highway network as set out in Section 6.2 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. - Construction traffic will be managed outside of network peak hours as set out in the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** paragraph 5.5.1 for HGV deliveries and paragraph 6.1.2 for worker shift patterns. - A delivery management booking system will be utilised to manage the flow of HGVs on the network, with drivers allocated a time slot for deliveries, as set out in Section 5.5 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. - Wheel washing facilities will be provided at each access to ensure that mud and debris is not transferred to the public highway as set out in Section 5.6 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. - Temporary route signage will be provided on the HGV routes, which will support adherence to the routes as well as warn other road users of construction traffic as set out in Section 5.7 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. In addition, Article 16 (traffic regulation measures) of the **draft DCO Revision A [EX1/GH3.1_A]** gives the undertaker the power to temporarily reduce the speed limit on any road for the purposes of construction, maintenance or decommissioning of the authorised development. Therefore, should it be identified as required, in consultation with the relevant highway authority on the detailed CTMP, the speed limit on Grendon Road and Station Road could temporarily be reduced during the construction phase in order to protect the safety of vulnerable road users. **Mears Ashby Road** There are two Mears Ashby Roads in the vicinity of Earls Barton. Mears Ashby Road between Wilby and Mears Ashby (Links 44 and 45) is not on an HGV route but may be used by construction workers to access Green Hill E and the cable corridor. It has been assessed for 8 two-way worker movements per day. The access strategy for Green Hill E has been developed to ensure that HGVs do not route along Mears Ashby Road. Instead, the majority of HGVs would access Green Hill E via Access E-1 on Highfield Road and a small proportion of HGVs would access Green Hill E via Access E-2. The other Mears Ashby Road in the vicinity of Earls Barton is Link 48, which connects the A4500 Main Road to Access E-2. Mears Ashby Road forms part of the HGV route to Access E-2. HGVs would not route through Mears Ashby, but there may be some worker trips routing through the village. Mears Ashby Road has been assessed for 2 two-way HGV movements per day and 6 two-way worker movements per day (cars and shuttlebuses combined). The access strategy for Green Hill E has been developed to ensure that minimal HGVs route along Mears Ashby Road due to the small proportion of Green Hill E which it provides access to. Mears Ashby Road is subject to a 40mph speed limit at the junction with the A4500, changing to a derestricted speed limit once north of Scotch Lodge Farm Shop. There has been a single PIC in the most recently available 5-years' worth of data where a vehicle collided with a cyclist resulting in a serious injury. The reason given was the driver of the vehicle failed to look properly. The

ExQ	Respondent	Question	Applicant's Response
			assessment in the **ES Chapter 13 Transport and Access [APP-050]** concludes that there would not be any significant adverse transport effects along Mears Ashby Road (link 48). Whilst it is recognised that the only PIC on this road involved a vulnerable road user, the reason for the crash does not indicate that there are issues with the road that would place cyclists at any greater risk from construction traffic as compared to existing road use. It should be noted that the same measures to manage construction traffic as set out above will apply equally to Mears Ashby Road, and measures such as a temporary speed limit reduction could be put in place if considered necessary in consultation with the relevant highway authority. **Doddington Road** The section of Doddington Road (link 83) that forms part of an HGV route is between the A45 Junction 11 and Construction Compound 2. HGVs would not route through Earls Barton to access Construction Compound 2. This section of Doddington Road, to the east of Earls Barton, has been assessed for 22 two-way HGV movements per day and 28 two-way worker movements per day (cars and shuttlebuses combined). The section of Doddington Road that forms part of the HGV route is subject to a 40mph speed limit with a footway on one side of the carriageway. There has been 2 PICs recorded in the last 5 years. One PIC related to a vehicle being on the wrong side of the carriageway (serious) and the other was a rear shunt (slight). **ES Chapter 13 Transport and Access [APP-050]** concluded that the scheme will not have a significant adverse transport effect on Doddington Road (link 83). The same measures included in the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** to manage construction traffic as set out for Station Road and Grendon Road would also apply to Doddington Road. **Mill Lane** Mill Lane is a byway open to all traffic, and is identified for access CR14 to the cable corridor. Mill Lane itself is crossed by the cable corridor to the north of the A45. During construction, HGVs will access the cable corridor in this location from access CR13, a new access located off Doddington Road, via a haul road. It is likely that construction worker traffic will also utilise access CR13, however it is possible that some workers may choose to travel via Mill Lane, particularly if they are travelling to the Scheme on foot or by bicycle. It is not anticipated that there will be more than minimal construction worker traffic utilising Mill Lane during the construction of the Scheme, and this route is not suitable for HGV traffic and does not form part of any HGV construction route. Mill Lane is, however, an existing access that enables the location of the cable corridor to be accessed during the operational phase and is likely to be used infrequently for inspection and maintenance of this section of cable. This use is consistent with the existing use of Mill Lane, which is open to vehicular use, with such use being made to access Mill House. It is not considered that any specific measures are required to protect pedestrians and cyclists using Mill Lane, however this will be reviewed as part of the detailed CTMP in consultation with the relevant highway authority.
Q20.0.11	The applicant	**Construction traffic – Walgrave** Please outline the levels and types of construction traffic which would use the Newland Road, Walgrave crossing.	Paragraph 6.4.6 of the **ES Appendix 13.2 Transport Assessment [APP-151]** summarises the access strategy for Green Hill A.

ExQ	Respondent	Question	Applicant's Response
			Newland Road bisects Green Hill A and is a designated Quiet Lane, subject to an advisory 20mph speed limit with signage in place. Construction traffic will not route along Newland Road to access Green Hill A. The majority of Green Hill A is located to the east of Newland Road and is proposed to be accessed via Broughton Road at Access A-1. The remaining smaller part of Green Hill A is located to the west of Newland Road. This section is proposed to be accessed via Broughton Road (Access A-1), with vehicles routing via an internal construction haul road and crossing Newland Road via a crossing point (Crossings A-1(E) and A-1(W)). Access A-2 is provided for future maintenance of Green Hill A and will not be used for construction access. The type of construction vehicles that may use crossing point (Crossings A-1(E) and A-1(W)) are HGVs, LGVs, cars and shuttlebuses. **ES Chapter 13 Transport and Access [**APP-050**]** assessed a reasonable worst case construction peak of 136 two-way construction worker movements per day (cars/ LGVs/ shuttlebuses combined) and 16 two-way HGV movements per day generated by Green Hill A routing along Broughton Road to Access A-1. As the majority of the solar arrays are within the section of Green Hill A to the east of Newland Road, only a small proportion of the Green Hill A construction traffic would need to cross Newland Road and the proposed crossing point. The crossing point will be managed with banksmen and users of Newland Road will be given priority over construction traffic crossing Newland Road.
Q20.0.12	The applicant	**Access – Green Hill D** Green Hill D would have four accesses from Highfield Road. Please explain why this number would be required.	A number of accesses are proposed to access Green Hill D from Highfield Road. It may be that not all of the accesses are required but they have been included to provide flexibility during the construction and operational phases. Accesses D1 to D5 are all located at existing field accesses, which have been designed to be upgraded as shown in the access designs in Appendix C of the **ES Appendix 13.2 Transport Assessment Part 1 [**APP-151**]**. **Table 13.10** of **ES Chapter 13 Transport and Access [**APP-050**]** summarises the potential use of the accesses and shows that all or some of Accesses D1 to D4 could be used during the construction phase and all or some of Accesses D2, D3 and D5 could be used during the operational phase. Paragraph 9.1.6 of the **ES Appendix 13.2 Transport Assessment Part 1 [**APP-151**]** summarises access strategy options that have been identified to add flexibility to the construction approach: - Highfield Road has been identified as a highway that may require passing places to be implemented during the construction phase to allow vehicles to pass, given that it will be used to provide access to Green Hill D, Green Hill E and the cable corridor. - During the construction phase there would also be the opportunity to provide a temporary haul route through Green Hill D to access Green Hill E, potentially enabling one-way working on Highfield Road for construction traffic. In this option, two-way working would be retained for general traffic on Highfield Road to ensure access to neighbouring properties.
Q20.0.13	The applicant	**dDCO – Construction Traffic Management Plan** Requirement 15 (construction traffic management plan) of the draft development consent order [APP-017] appears to require amendment to "No part of the authorised development may commence until a construction traffic management plan for that part **has been** submitted to and approved by the relevant planning authority". Please advise.	This typographical error has been corrected in in **Revision A** of the **draft DCO [EX1/GH3.1_A]**.

ExQ	Respondent	Question	Applicant's Response
Q20.0.14	The applicant	**Typographical errors** 2.2.1 of the outline Construction Traffic Management Plan [APP-553] refers to the Green Hill A Access A-1 as lying off Broughton Lane, which should be "Broughton Road". The A2 Access description should also be updated to "Kettering Road". The same issues occur at 2.1 of the outline Operational Traffic Management Plan [APP-569].	This has been amended in the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** at paragraph 2.2.1 and **Outline Operational Traffic Management Plan Revision A [EX1/GH7.25_A]** at paragraph 2.2.1 submitted at Deadline 1.
Q20.0.15	The applicant	**Abnormal load assessment – Green Hill C** Does the Abnormal Load assessment at Table 7.1 of the outline Construction Traffic Management Plan [APP-553] take account of both the solar array and potential BESS abnormal load traffic, in respect of Green Hill C only?	The abnormal loads associated with Green Hill C relate to the substation being delivered and will be the same irrespective of whether the BESS is also placed within Green Hill C.
Q20.0.16	The applicant	**Highway safety - access and unloading** 7.2.5 of the outline Construction Traffic Management Plan [APP-553] states that "the Cable Reel Trailer and vehicle will get as close to the relevant access as possible, or it will enter the corridor or compound. From here, the cable drum can be unloaded and towed along the haulage road to the appropriate location for installation". Does the statement envisage that some unloading of the cable drum from the trailer would occur on the highway?	All unloading and pulling of the cable drum will take place off the public highway and within the site. This has now been specifically referenced in paragraph 7.2.5 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** submitted at Deadline 1.
Q20.0.17	The applicant	**Highway safety – unloading** The cable reel trailer would be an abnormal load. Would the trailer be unloading at the cable route accesses shown by "CR" on the Figures 13.13-13.17 [APP-444 to APP-448]?	Yes, the cable reel trailer will be unloading at the cable route accesses shown by 'CR' on **Figures 13.13-13.17 17** [**APP-444 to APP-448**], but not exclusively. The accesses labelled CR are for construction of the cable corridor and its compounds, and so the accesses have been designed to cater for a low loader which would carry the cable drum, which can be seen in **Appendix C of the Transport Assessment (Part 1 and 2) [APP-151 and APP-152]**. Further to this, the cable corridor can be accessed by a number of site accesses also. The use of each access and the purposes for which it will be used, including for the construction of the cable route, is set out in **Table 13.10** in **ES Chapter 13 Transport and Access [APP-050]**.
Q20.0.18	The applicant	**Highway safety – traffic disruption** The cable reel trailer would be significantly larger than a standard HGV. How would the proposed development manage any disruption to traffic which may be caused if the cable reel trailer were unloading or waiting on the highway?	All unloading and pulling of the cable drum will take place off the public highway and within the site. This has now been specifically referenced in the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** submitted at Deadline 1.
Q20.0.19	The applicant	**Omission – access routes** Some of the routes which would provide access are missing from Table 13.16 of [APP-050], for example Broughton Road (Site A) and Kettering Road (Site B). Please explain why this is?	Table 13.16 of Chapter 13 Transport and Access [APP-050] provides a summary of key links utilised by the Scheme, being the links that form part of multiple construction routes and will therefore see the greatest volume of construction traffic. Tables 13A1.3 and 13A1.4 of **ES Appendix 13.1** of **Chapter 13 Transport and Access [APP-150]** set out the complete development traffic and impact for all links assessed within the study area.
Q20.0.20	The applicant	**Highway safety – HGV routes** Earls Barton Parish Council [RR-1222] raises concerns that HGVs may access parts of the village where they are not currently permitted, giving rise to road safety concerns. Could the applicant respond explaining any measures designed to prevent this?	HGVs associated with the scheme will only be permitted to travel along Northampton Road (B573 – link 52) to the west, Main Road (A4500 – link 49) to the north, and Doddington Road (B573 – link 83) to the east of Earls Barton adjacent to Earls Barton. No HGVs would be permitted to route through Earls Barton. A Delivery Management System will be put in place which will inform drivers of the routes to take for each delivery, as set out in Paragraph 5.5.2 of the in **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. The following amendments have been made to the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** to further strengthen the approach to HGV route compliance:

ExQ	Respondent	Question	Applicant's Response
			1) Banksman at each site access will record the direction HGVs arrive from. Any that do not arrive from the direction adhering to the HGV routes will be recorded and any instances of non-compliance will be raised with the relevant contractor. Potential correction actions have been added to the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** at paragraph 5.12.3 (e.g. additional signage on HGV routes, improvements to the communication strategy, replace HGV drivers if there are repeat breaches, suspend delivery booking slots to contractors that repeatedly breach HGV routes until corrective action taken). If necessary, the issues will be discussed with the relevant local highway authority to make them aware of correction action taken as set out in paragraph 5.12.1 in the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. 2) A telephone line will be set up for members of the public to report suspected breaches of the HGV routes which will be investigated and addressed with the relevant contractor.
Q20.0.21	The applicant	**Highway safety – parking** The outline Construction Traffic Management Plan [APP-553] (oCTMP) states at 2.6.4 that parking for contractors, visitors or delivery vehicles to the sites would be within the construction compounds. It says that the site manager would regularly check that parking is taking place in these areas. A concern has been raised regarding parking on village roads. Has the necessary parking including for at times of peak demand been calculated and allowed for within the compounds, in particular CC2 which is close to Earls Barton, and CC4 which is close to Grendon?	Whilst the exact parking provision has not been defined at this stage, sufficient parking will be provided within the construction compounds to allow for all staff, visitors and contractors during peak times. As set out in Section 6.2 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A],** it is proposed to utilise shuttlebuses to transport workers to the various site accesses from nearby conurbations, which will reduce the car parking demand at the compounds. A conservative level of shuttlebuses have been included in the assessment in **ES Chapter 13 Transport and Access Chapter [APP-050]** in order to provide a reasonable worst case assessment, but further shuttlebuses could be utilised if required in order to further manage parking demand.
Q20.0.22	The applicant	**Road condition surveys** Section 5.2 of the oCTMP [APP-553] sets out that road condition surveys would be made of minor roads used for construction access prior to and following construction. The extent of surveys would be agreed with the highway authority, and any repairs would be carried out to the satisfaction of the highway authority. The post-construction survey would seek to identify any defects that could reasonably be attributable to the proposed development's construction activities. Would the highway authority have any input into the process of determining whether defects were attributable to the Scheme?	Yes, the local highway authority would need to approve the defects identified and remedial action to be taken to address the defects. This has been clarified at paragraph 5.2.2 of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**. This is a standard approach advocated by LHAs when approving CTMPs associated with larger scale developments, for example residential developments.
Q20.0.23	The applicant	**Water and highway safety** Have the requirements for tankering water to and from the site (for example for septic tank emptying: 10.8.23 of the Hydrology Flood Risk and Drainage chapter [APP-047], panel washing: 10.8.58 of [APP-047], firewater disposal where necessary: 10.9.3 of [APP-047] been factored into the traffic and transport assessments and APP-553 the oCTMP [APP-553]?	**Construction Phase** Paragraph 10.8.23 of **ES Chapter 10 Hydrology Flood Risk and Drainage Revision A [EX1/GH6.2.10_A],** refers to the need for a septic tank at construction welfare facilities to be emptied when required during the construction phase. As discussed in **ES Chapter 10 Hydrology Flood Risk and Drainage [EX1/GH6.2.10_A]** and **ES Chapter 24: Other Environmental Matters Revision A [EX1/GH6.2.24_A],** any wastewater generated from welfare facilities will be removed by tanker to an approved wastewater and sewage treatment centre. This will be undertaken by an appropriate specialist in line with good practice. These infrequent and low volume HGV movements have been included in the HGV forecasts and assessed in **ES Chapter 13 Transport and Access Chapter [APP-050]**. **Operational Phase**

ExQ	Respondent	Question	Applicant's Response
			Paragraph 10.8.58 of **ES Chapter 10 Hydrology Flood Risk and Drainage Revision A [EX1/ GH6.2.10_A],** refers to the need for periodic solar panel washing during the operational phase, which would require delivery of water by tankers. Paragraph 10.9.3 of **ES Chapter 10 Hydrology Flood Risk and Drainage Revision A [EX1/ GH6.2.10_A],** refers to the need for the potential requirement to tanker water off site in the event of a fire. Paragraph 10.8.27 of **ES Chapter 10 Hydrology Flood Risk and Drainage Revision A [EX1/ GH6.2.10_A]** refers to the need for periodic tankers to remove wastewater associated with welfare facilities at the as there will be no foul drainage network associated with the Site. Section 4.6 of the **Water Resources Assessment [APP-563]** outlines the feasibility of water tankering and highlights the availability of specialist suppliers. It confirms that several companies were engaged to discuss the scheme's requirements, with assurances provided regarding the suitability of this approach. These events would be infrequent and would generate a low level of daily HGV movements over a short period of time and would be significantly lower than the HGV movements associated with the construction phase. Paragraph 13.4.9 of **ES Chapter 13 Transport and Access Chapter [APP-050]** states that '*The assessment identifies that movements associated with the operation and maintenance phase are expected to be below those that may occur during the construction phase. Accordingly, traffic movements during the construction phase provide a focus for the assessment of the Scheme's effects…*'.
Q20.0.24	The applicant	**Public rights of way** West Northamptonshire Council [RR-1251] request engagement with the applicant to agree a public rights of way diversions strategy. Please provide a response to the request.	The Applicant has contacted West Northamptonshire Council to arrange a meeting to agree the public rights of way diversion strategy, the Councils response acknowledged that there are no permanent PRoW diversions in West Northamptonshire and that further comments will be presented in their Local Impact Report. The Applicant will continue to engage with the Council on these matters.
Q20.0.25	The applicant	**Typographical error or omission** The draft development consent order [APP-017] allows (at Pages 71-72) for the temporary closure of 0 metres of Path TF/005. Would the provision fail to have effect as a path must have a length?	The distances as set out in the draft DCO had been rounded to the nearest whole metre. This is considered appropriate as article 2(4) of the draft DCO confirms that all distances are approximate. The distance relevant to path TF/005 has been corrected in **Revision A of the draft DCO [EX1/GH3.1_A]** to 0.45 metres.
Q20.0.26	The applicant	**Hedgerows and connectivity** The planting of new hedgerows adjacent to existing hedgerows to provide wildlife corridors and contribute to green infrastructure is set out at paragraph 4.3.11 of the OLEMP [APP-548]. Have opportunities using such corridors to improve the connectivity of the public rights of way and permissive path network, and to connect habitats and people with the environment been assessed?	Yes. The Applicant has committed to the provision of permissive paths on the Scheme to increase the connectivity of the PRoW network. These have largely been located along field boundaries, and so benefit from being located alongside enhanced and new hedgerows, and in areas of tussock grass or diverse meadow, where users are more likely to feel closer to habitats and nature. The location of permissive paths, and the proposed planting regime that they are located within, are shown on **ES Figures 4.10** to **4.20 Landscape and Ecology Mitigation Plan [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]**. The assessment of enhancement to user experienced is considered in **ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [EX1/GH6.3.17.1_A]** wherein permissive routes are assessed for their contribution to enhancing PROW network connectivity and user enjoyment for those on connective PROWs to the proposed permissive paths.
Q20.0.27	The applicant	**PROW Condition Surveys** Road Condition Surveys are set out at 5.2 of the outline Construction Traffic Management Plan [APP-553]. Are there comparable provisions for public rights of way surveys, so that any damage to surfaces caused by construction traffic would be rectified?	The **Outline Public Rights of Way and Permissive Paths Management Plan Revision A [EX1/GH7.10_A]** commits to repairing of damage to the surface of PROWs, including returning PROWs to their original condition if altered for construction.

ExQ	Respondent	Question	Applicant's Response
			This commitment is found in paragraphs 3.2.23 and 4.1.5 of the **Outline Public Rights of Way and Permissive Paths Management Plan Revision A [EX1/GH7.10_A]** which is secured by Requirement 18 of Schedule 2 to the **draft DCO Revision A [EX1/GH3.1_A]**. Paragraph 3.2.22 of the **Outline Public Rights of Way and Permissive Paths Management Plan Revision A [EX1/GH7.10_A]** which is secured by Requirement 18 of Schedule 2 to the **draft DCO Revision A [EX1/GH3.1_A]** includes a condition survey of the PRoW that will be affected by the construction traffic, which would be undertaken prior to commencement of construction. The PRoW Condition Survey will likely take the form of photographic evidence of the condition of the PRoW and could include a site meeting with officers from the relevant authority. However, the scope of the surveys will be agreed with the local highway authority and National Highways in advance. Once construction is complete, a further PRoW Condition Survey will be undertaken. Any damage to the surface of the PRoW will be repaired as soon as practicable. The surface will be returned to its original condition following construction.
Q20.0.28	The applicant	**Highway debris and cleaning** Chapter 13 Transport and Access [APP-050] states that "Notwithstanding wheel washing measures, a road sweeper will be used as required to alleviate any residual debris generated during the construction phase". Given the representations raising concerns about mud on roads and dust, can the applicant explain how the requirement for road sweeping would be assessed?	As set out in **ES Chapter 13 Transport and Access [APP-050]** notwithstanding the use of wheel washing facilities, a road sweeper will be deployed as required to alleviate any residual debris generated during the construction phase. The requirement for road sweeping would be managed and assessed through the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]**, which will include a programme of routine inspection and monitoring of the site access points and adjacent sections of the public highway. Visual inspections of the public highway in the vicinity of the site accesses will be undertaken on a daily basis by the site manager. Where inspections identify visible deposits of mud, dust, or debris on the public highway, or where concerns are raised by the local highway authority, or reported by the public to the community liaison officer, a road sweeper will be deployed promptly to remove such material. Records of inspections and any road sweeping undertaken will be maintained within the site's environmental log and made available to the local highway authority upon request. The frequency and effectiveness of the measures will be reviewed throughout the construction period to ensure that appropriate and proportionate mitigation remains in place to maintain highway safety and cleanliness. Further information on road sweeping has been included in **Section 5.6** of the **Outline Construction Traffic Management Plan Revision A [EX1/GH7.9_A]** submitted at Deadline 1.
Q20.0.29	The applicant	**Omissions** Some of the public rights of way marked for temporary stopping up according to the keys on Sheets 17 and 18 of the Public Rights of Way Plan Revision A [AS-009]) are not recorded in Schedule 6, Part 2 (Public Rights of Way to be temporarily closed) of the draft development consent order [APP-017]. These appear to be: MK/Lavendon/002 (18e/i – 18g/i – 18d/i), MK/Lavendon/004 (18g/i – 18g/ii) and MK/Lavendon/014 (18f/i – 18f/ii). All of these sections of path do, however, appear in Schedule 6, Part 3 of the draft development consent order (Temporary Use of motor vehicles on public rights of way). Please update the documents as necessary.	The three Public Rights of Way referred to were inadvertently omitted from the draft DCO. This has been rectified in **Revision A** of the **draft DCO [EX1/GH3.1_A]**.
Q20.0.30	The applicant	**Permissive footpath – extent** Please confirm the extent of the green lane passing through the east part of Green Hill A (north-east from Newland Road) which is existing permissive footpath.	The extent of the green lane in Green Hill A which has existing permissive access rights is approximately 1.0 km in length. This extends from Newland Road to the northwest corner of AF24. This is equivalent to plots 01-005, 01-009, and 01-011 on the **Land Plan Revision B [EX1/GH2.2_B]**.

2.21 Water Environment

ExQ	Respondent	Question	Applicant's Response
Q21.0.1	The applicant	**Consultee – Anglian Water** Anglian Water stated at Issue Specific Hearing 1 that it has been added as a consultee on the detailed drainage strategy for other nationally significant infrastructure projects. Please provide comments on whether the addition of Anglian Water as a consultee on the surface and foul water drainage details set out in requirement 11 of the dDCO is considered appropriate in this case.	Requirement 11 in Schedule 2 to the **draft DCO Revision A [EX1/GH3.1_A]** secures approval of detailed surface water drainage by the relevant local planning authority in consultation with the Lead Local Flood Authority, consistent with the statutory arrangements under the Flood and Water Management Act 2010. As set out in the **Flood Risk Assessment and Drainage Strategy Revision A [EX1/GH6.3.10.1_A]**, the Scheme does not discharge surface water or foul water to Anglian Water's network. Surface water will be managed through on-site attenuation and controlled discharge to local watercourses, and foul drainage from welfare facilities will be contained within sealed systems or package treatment plants regulated by the Environment Agency. Anglian Water's assets are already safeguarded through Protective Provisions in Part 5 of Schedule 15 to the **draft DCO [EX1/GH3.1_A]**, and the **Flood Risk Assessment and Drainage Strategy [EX1/GH6.3.10.1_A]** has been updated to make it clear that consultation with Anglian Water must be carried out in the event any connection to its assets are proposed. Following further discussions with Anglian Water, the Applicant has updated Requirement 11 to include Anglian Water as a consultee.
Q21.0.2	The applicant	**Anglian Water RR** Please provide a response on the following matters raised by Anglian Water in its Relevant Representation [RR-1214]: arrangements for wastewater collection, whether the draft development consent order should provide for a general right to connect to any of Anglian Water's assets, how the construction of haul roads and bellmouths would be managed with regard to utility assets, and whether access to Anglian Water assets would be compromised by the proposed development.	The **Flood Risk Assessment and Drainage Strategy Revision A [EX1/ GH6.3.10.1_A]** confirms that the Scheme will not connect to Anglian Water's foul or surface water networks. Wastewater from welfare facilities will be contained within sealed septic tanks or package treatment systems managed in accordance with the Environment Agency's *General Binding Rules* or separate Environmental Permit where required. No connection to Anglian Water's infrastructure is sought. Anglian Water's statutory assets are safeguarded through the Protective Provisions included in Part 5 of Schedule 15 to the **draft DCO Revision A [EX1/GH3.1_A]**, which prevent interference with their apparatus and secure continued access. Accordingly, in the unlikely event that refinement of the drainage strategy required a connection to be made into a sewer owned by Anglian Water, this could only be done with the approval of Anglian Water. In order to ensure that Anglian Water has early oversight of any such proposal, the **Flood Risk Assessment and Drainage Strategy Report Revision A [EX1/GH6.3.10.1_A]** has been updated to specifically require consultation with Anglian Water in the event a connection to its assets is identified as required. Haul roads, bellmouths and other construction works will be designed to avoid conflict with buried or above-ground utilities. Locations of existing services, including Anglian Water assets, will be confirmed through survey and consultation prior to construction, as set out in the **Outline Construction Environmental Management Plan Revision A [EX1/ GH7.1_A]**. On this basis, access to Anglian Water's assets will not be compromised, and all relevant controls are already secured through the draft DCO and embedded management measures.
Q21.0.3	The applicant	**Clarification on parties and Nitrate Vulnerable Zones** Chapter 10: Hydrology Flood Risk and Drainage [APP-047] refers at 10.3.6 to the Environment Agency and landowners in respect of the Land Drainage Act 1991, but does not refer to the lead local flood authority or internal drainage boards and responsibilities or consenting. It also refers to Nitrate Vulnerable Zones, which are not mentioned in the Act. Please explain the reasons for these points.	Paragraph 10.3.6 of **ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/ GH6.2.10_A]** provides a broad summary of the Land Drainage Act 1991, which establishes the powers and duties of various drainage authorities and landowners in the management of watercourses. The paragraph refers generally to the Environment Agency and landowners but does not explicitly name the **Lead Local Flood Authorities (LLFAs)** or **Internal Drainage Boards (IDBs)**, both of which also hold regulatory roles under the same legislation. LLFAs are responsible for granting consent for works to ordinary watercourses in areas not covered by an IDB, while IDBs exercise these powers within their districts.

ExQ	Respondent	Question	Applicant's Response
			The omission of LLFAs and IDBs in paragraph 10.3.6 was not intended to exclude them from consideration, but to summarise the legislation at a high level. Their roles are described elsewhere in of **ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/ GH6.2.10_A]** and within the **Flood Risk Assessment and Drainage Strategy [EX1/GH6.3.10.1_A]**, which confirms that any works affecting ordinary watercourses will require Land Drainage Consent from the relevant LLFA or IDB prior to construction. It should be noted that this is caveated with "if required" to reflect that the **draft DCO [EX1/GH3.1_A]**, at article 6, seeks to disapply the requirement for ordinary watercourse consent found in section 23 of the Land Drainage Act 1991. A DCO may only disapply section 23 of the Land Drainage Act 1991 with the consent of the relevant LLFA; such consent is being sought and will be recorded in the Statements of Common Ground with each of the host local authorities. The Applicant has amended paragraph 10.3.6 in the next iteration of **ES Chapter 10: Hydrology, Flood Risk and Drainage Revision A [EX1/ GH6.2.10_A]** to explicitly reference these authorities for completeness. The reference to Nitrate Vulnerable Zones (NVZs) in paragraph 10.3.7 was included to provide contextual information on local water quality and environmental sensitivity rather than as a component of the Land Drainage Act 1991. NVZs are designated by the Environment Agency under the Nitrate Pollution Prevention Regulations 2015 to manage nitrate inputs from agriculture. Including this reference was intended to give a fuller picture of the environmental baseline relevant to drainage and water management considerations. The Applicant has clarified this distinction in the updated chapter to ensure that the reference is clearly identified as part of the baseline context, along with its correct legislative content.
Q21.0.4	The applicant	**Surface water levels** The FRA and Drainage Strategy Annex E Green Hill C [APP-103] states at 3.2.7-8 that surface water would be discharged to a land drain. No mention is made of the state of this receiving watercourse. What would happen if its water level were high and the gravity system proposed did not have sufficient additional water levels behind the "flow restriction device" to allow a discharge. If the storage pond were to fill up, where would the additional water go? Has this been considered in the analysis?	The **Flood Risk Assessment and Drainage Strategy Revision A [EX1/GH6.3.10.1_A]** and associated annexes, including Annex E [APP-103], present an outline-level drainage design to demonstrate that a feasible solution exists for all development areas. At this stage, detailed hydraulic design of each outfall and its receiving drain has not yet been undertaken. The potential for elevated downstream water levels or a surcharged outfall is recognised and will be accounted for within the detailed design when discharge points and control structures are confirmed. This is a standard aspect of gravity drainage design and, where necessary, will be addressed through freeboard allowance, non-return valves or temporary on-site storage. The attenuation volumes assessed within the FRA already accommodate the 1 in 200 year + 40 % climate-change event, ensuring that even if downstream levels are high, surface water can be safely contained on site without increasing flood risk elsewhere. The detailed design will be submitted for approval under Requirement 11 in Schedule 2 to the **draft DCO Revision A [EX2/GH3.1_A]**, in consultation with the relevant Lead Local Flood Authority. This process will ensure that realistic downstream conditions are incorporated and that exceedance routes remain safely contained within the site.
Q21.0.5	The applicant	**Disapplication and modification of legislation** Please provide further detail on how the disapplication and modification of legislation proposed by Article 6 of the draft Development Consent Order [APP-017] in respect of water interests would be justified, including whether sufficient safeguards would be provided to enable the disapplications to proceed without detriment to existing situations.	Article 6 of the **draft Development Consent Order [APP-017]**, as updated in **Revision A [EX1/GH3.1_A]**, provides for the disapplication of limited provisions of the Land Drainage Act 1991, the Water Resources Act 1991 and the Environmental Permitting (England and Wales) Regulations 2016 in relation to flood-risk activities. This approach is standard for Development Consent Orders and avoids the need for duplicate consents once the Scheme has been authorised. The proposed disapplication of the requirement for a consent under section 23 of the Land Drainage Act 1991 requires the consent of the relevant LLFA pursuant to section 150 of the Planning Act 2008 and the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015. Similarly, the consent of the Environment Agency is

ExQ	Respondent	Question	Applicant's Response
			required for the disapplication of the requirement for an environmental permit for flood risk activity. The disapplication of these items of legislation reflect where equivalent control is secured within the DCO. Detailed surface-water and foul-water drainage designs will be approved under **Requirement 11 in Schedule 2 to the draft DCO Revision A [EX2/GH3.1_A]**. Additional safeguards are provided through the Protective Provisions for the Environment Agency in **Part 7 of Schedule 15**, which ensure that no works may interfere with existing drainage infrastructure associated with Main Rivers without written consent. This approach has been discussed with the Environment Agency and the Lead Local Flood Authorities during pre-application and through the Statement of Common Ground process, and no objections have been raised to the principle of the disapplication subject to these safeguards. The approach is therefore justified as it consolidates control within the DCO framework while maintaining equivalent environmental and regulatory protection.
Q21.0.6	The applicant	**Clarification on Flooding Status** In Table 3.1 of The Development Site chapter [APP-040] it states that "*The Environment Agency's (EA) Historical Flood Map indicates that Green Hill A.2 have historically flooded and neither has the areas immediately surrounding either site."* Should this say '...have not historically flooded...'?	The Applicant has updated **Chapter 3: The Development Site Revision A [EX1/GH6.2.3_A]** to amend Table 3.1 to state *"The Environment Agency's (EA) Historical Flood Map indicates that Green Hill A.2 has not historically flooded and neither has the area immediately surrounding either site."*
Q21.0.7	The Environment Agency and any other IPs	**Climate change allowance** Tables 2 and 3 in appendix 10.1 of the Flood Risk Assessment [APP-097] set out the climate change allowances applied to the FRA, including from the 2080s epoch. The climate allowances from the 2080s epoch would still be relevant to the to the assessment should the proposed development commence operation in 2029 and be decommissioned after a maximum 60 years in 2089. Please confirm that you are content with the climate change allowance epoch used given that proposed development is predicted to operate until 2089.	The Applicant notes that this question is not directed at the Applicant.
Q21.0.8	The Environment Agency and any other IPs	**Climate change allowance** Paragraph 2.4.1 of appendix 10.1 of the Flood Risk Assessment [APP-097] references the EA's 'Flood Risk Assessments: Climate Change Allowances' guidance. Please confirm that you agree with the climate change allowance provided.	The Applicant notes that this question is not directed at the Applicant.
Q21.0.9	The applicant	**Flood Zones** Please explain why the Flood Risk Assessment [APP-097] does not differentiate between flood zone 3a (high probability of flooding) and flood zone 3b (functional floodplain) in relation to the proposed development.	The **Flood Risk Assessment and Drainage Strategy Revision A [EX1/GH6.3.10.1_A]** defines flood risk using the Environment Agency's Flood Map for Planning, which combines Flood Zone 3a and Flood Zone 3b into a single Flood Zone 3 extent. Identification of functional floodplain normally requires detailed hydraulic modelling or information from the Local Planning Authority's Strategic Flood Risk Assessment (SFRA). For the Green Hill Solar Farm, hydraulic modelling of the River Nene and Grendon Brook catchments, as reported in **Flood Risk Assessment and Drainage Strategy Annex J Revision A [EX1/ GH6.3.10.11_A]** and **Annex F (Green Hill D) [APP-104]**, demonstrates that only limited, peripheral parts of the Order Limits are affected by Flood Zone 3. These areas are restricted to localised sections of agricultural land adjoining the watercourses. Through embedded mitigation and design buffers, all permanent operational infrastructure, including the Battery Energy Storage System, substations and access tracks, has been located outside these areas. As a result, no development is proposed within land that would be designated as functional floodplain, and any minor areas remaining within Flood Zone 3 are occupied only by raised solar panels that are resilient to shallow flooding. The combination of site selection and embedded

ExQ	Respondent	Question	Applicant's Response
			mitigation ensures that all infrastructure lies outside areas corresponding to functional floodplain, and that flood risk to the Scheme and surrounding land is effectively negligible.
Q21.0.10	The applicant	**Flood warning system coverage** The Flood Risk Assessment [APP-097] states that there selected sections of the site covered by a flood warning system, however no justification is provided why these areas have been chosen. Please provide a rational for this coverage.	The **Flood Risk Assessment and Drainage Strategy Revision A [EX1/GH6.3.10.1_A]** notes that parts of the Order Limits fall within areas covered by the Environment Agency's existing Flood Warning Service. The extent of this coverage is defined solely by the Environment Agency, based on its telemetry network and modelled flood extents, and cannot be altered or selected by the Applicant. The areas of coverage correspond to land adjoining the River Nene, Grendon Brook and Swanspool Brook, which are the only locations within or near the Order Limits subject to modelled fluvial flood risk. The remainder of the site lies within Flood Zone 1 and is not included within any flood warning area. The reference in the **Flood Risk Assessment and Drainage Strategy Revision A [EX1/GH6.3.10.1_A]** is therefore factual and intended to show that parts of the site at theoretical flood risk are already monitored under the Environment Agency's system, while all operational infrastructure, including the Battery Energy Storage System and substations, lies outside those areas.

2.22 Minerals

ExQ	Respondent	Question	Applicant's Response
Q22.0.1	Host Local Authorities	**Impact on sand and gravel allocation M2: Strixton – Bozeat** ES Chapter 11 [APP-048] identifies that Green Hill F would abut the sand and gravel allocation M2: Strixton – Bozeat. As mitigation, the proposed development seeks to maintain vehicular access to the allocation and has been designed to retain a minimum 30 metre separation between the allocation boundary and the nearest solar panel. Do you have any concerns that this approach would be insufficient?	The Applicant notes that this question is not directed at the Applicant.

References

Ref 1.1 Department for Energy Security and Net Zero (DESNZ) (2024) UK Solar Roadmap. London: HM Government. Available at: https://assets.publishing.service.gov.uk/media/685d6e483e6b7941f4e00afb/35.87_DESNZ_UK_Solar_Roadmap_final.pdf

Ref 1.2 EPRI. (2025). *BESS Failure Incident Database*. EPRI Storage Wiki. Available at: [redacted]

Ref 1.3 EPRI. (2022). Quantum Science and Technology: 2022 Technology Update Across the Energy Industry. Electric Power Research Institute. Available at: [redacted]