

**From:** Marion Turner-Hawes [REDACTED]  
**Sent:** Friday, November 07, 2025 23:46  
**To:** Green Hill Solar <greenhill@planninginspectorate.gov.uk>  
**Cc:** Marion Turner-Hawes [REDACTED]  
[REDACTED]

**Subject:** Re: Thoughts for 7th November GHS submission - version 2

To whom it may concern,

I write on behalf of Wellingborough Walks Action Group re-Greenhill Solar application EN010170. With the following comments:

**(1) Mitigation Proposals** - the planned mitigations seem positive as are the Applicant's commitment to protect ancient, veteran and category A trees. However, given the very small number of trees of these trees onsite, and the large number of category B, C and U trees of good quality present, it is still likely that a significant loss of healthy trees across the site will occur.

**(2) Cable Corridor Impacts** - the process that will most impact non-ancient/veteran trees is work on the cable corridors. We had expected access to fields to have the highest impact, but from analysis it looks like over 80% of possible tree losses will come as a result of cable corridor creation. This is surprising given the many mitigation techniques the Applicant is committing to use to safeguard trees, such as micro-siting, HDD trenchless digging and using the 50m corridors to 'avoid' and protect trees. The Applicant is committed to use these techniques for ancient, and category A trees, but less so for category, B, C and U trees.

**(3) Likely Impacts on Site Trees** - From our analysis it appears that 2,665 trees are on site (974 individual and 1,690 trees in 169 groups, assuming ave of 10 trees per group) (ref APP 171 - point 4.2, p23), and roughly 368 healthy mainly cat B and C trees may need to be felled (78 individual, and 290 in 29 groups) (ref - APP 056, table 19.11, p37). This equates to 14% of all trees. And when further potential impacts noted in table 19.12, on p39 of APP 056, are added, ie. root and canopy impacts, the trees affected rises to 22% of all trees, a staggering amount. The Applicant mentions these are 'worst case scenario', but they remain worrying high. Northamptonshire already has one of the lower tree canopy coverages in England at 10%, (England ave is 12.8%), thus we can ill-afford to lose this amount. Clearly, if the Applicant decides to use

mitigation measures for the cable corridor to protect more category B and C trees, the losses could be significantly lower.

**(4) Felling Lower Category Trees and Climate Emergency** - we note the commitment that if trees have to be felled they plan to target younger, lower category trees first (see APP 171). However, given the climate emergency all trees are valuable and need to be safeguarded. With UK Government's net zero target of 2050, new trees planted now will only have 25 years of growth by then, and will provide much lower CO<sub>2</sub>e storage benefit compared to trees already growing who, by then will be making a more significant CO<sub>2</sub>e contribution, as well as continuing to provide habitats and sustain bio-diversity. And of course category B, C and U trees now, if retained, will be our category A and B trees of the future.

Clearly, the main reason for potentially allowing this development is to reduce CO<sub>2</sub>e emissions nationally through green energy generation. It feels perverse that the local area may suffer and become more depleted to enable this, as presently there appears few benefits to local communities of this scheme.

**(5) Depleting Ash Trees** – We note that the highest proportion of trees across the scheme is ASH (57%) - (APP 171, point 4.2.5, p 24). It's fair to assume then that Ash trees will also make up the largest amount of trees that could be affected by felling. However, with ash dieback disease causing significant losses in this area, felling healthy ash trees does not seem a sensible. Particularly since there is increasing evidence that ash dieback seems to cause more problems to new/young. It seems, therefore, taking steps to protect older ash trees is vital regardless of category.

**(6) Draft DCO Tree Preservation Status** - Given the experience of our group and residents who fought to save TPO'd trees on 'The Walks' in Wellingborough, we are concerned to see (OAMS part of APP 171, points 7.6.5 and 7.6.6) that the DCO, if agreed, will confer 'deemed consent' on the Applicant to 'undertake works to TPO trees without first having to apply for permission to the local planning authority. For local campaigners any sense that a DCO would give the Applicant a 'free hand' to decide lop or fell TPO trees that they may feel are 'in the way of construction', is concerning.

As the judgement in the case of WWAG v NNC in the High Court in May 2024 concluded, no felling was automatically permitted under a 'planning

permission' if a reasonable alternative to felling could be found. Given the many mitigation measures and techniques outlined by the Applicant in APP 171, including the commitment not to fell or lop TPO trees themselves, we would not expect to see any TPO trees on the scheme being affected in this way.

**(7) Concerns about extensive hedgerow removal** - Having noticed the extent of hedgerows removal the Applicant is planning (Draft DCO schedule 12, p 97 to 126) we are concerned about the likelihood of significant loss of biodiversity, habitat and food source for numerous species, as well as the loss of extensive hedgerows, some of which will have been part of this landscape for many years.

The fact that the Applicant intends to replace some hedgerows will not compensate for the loss of these natural assets, which many bats, hares, birds, monk-jack deer, and other mammals rely on for shelter, habitat and food. The Applicant's plans to 'rebuild' some hedges, and plant new ones is to be welcomed, but the extent of removal seems considerable. Could more be done to save them.

The loss of carbon storage as a result of hedgerow loss should also not be underestimated, as well as the role they play in holding the landscape together, holding on to water and helping reduce the likelihood of flooding, which is a significant issue across much of the landscape of this scheme. And whilst some replacement planting is planned, re-growth timescales will take many years, leaving the land less able to support communities (human or otherwise) to cope with increased flood risk.

**(8) Keeping to Mitigation Commitments** - The mitigations planned by the Applicant to protect trees throughout the life of the scheme are extensive. However, we are concerned about what protections will remain if the Applicant decides to sell the scheme after a few years. Northants has experienced considerable development in recent years but few of the many commitments made by developers made during this time (via section 106 agreements) seem to have transpired. What protections does the Applicant intend to put in place over the life of their scheme to ensure that all tree mitigations remain regardless of who owns the scheme moving forward. And what safeguards will the government put in place to help ensure commitments in the Applicant's Commitment Register (APP 064) will be enforced.

**(9) Community Benefits** - There is a clear omission of any commitment by the Applicant to deliver direct benefits to the people, businesses and communities that will be affected by this scheme if given the go ahead. I have advocated for renewable energy over many decades and I find it ironic to be challenging this scheme in my area. However, it presently has few of the collective benefits that I imagined would arrive with the delivery of solar power on our doorstep. At the top of the list would be the provision of affordable electricity for people/communities living nearby, or at least a community fund to help improve the energy efficiency of local homes. Also maybe an opportunity for local residents to buy into the scheme, as other generators are doing. It saddens me that none of this is on offer and, at present, little is even mentioned about a section 106 agreement.

We request the question of the community benefit of this scheme be added by the ExA's list of 'Initial Assessment Principles and Areas'. Given this is Nationally Strategic Infrastructure which communities across the UK are expected to 'host', it seems reasonable Government should assess the Applicant's commitment to ensure meaningful benefit is received by communities living nearby. It feels perverse that if this scheme goes ahead and delivers 500MW of electricity, that not even a 1p per kWh saving in electricity costs would benefit people living nearby. This scheme surely provides an opportunity for this to change. It would be good if an assessment of local benefit can be added to the many elements ExAs are exploring in this application.

**(10) Request for an Open Floor Hearing** - We request an OFH be held to explore:

1. the holistic impacts of the scheme on trees, hedgerows, woodland and the flora and fauna that occupy the sites.
2. the question of community benefit from this scheme and alternative approaches to the very 2 dimensional scheme which is being offered at present

**Marion Turner-Hawes**  
**Director**

**Marion Turner-Hawes**

