GREEN HILL
SOLAR FARM

Green Hill Solar Farm
EN010170

The Applicant's Responses to Local Impact Reports

Prepared by: Lanpro Services

Date: November 2025

Document Reference: EX2/GH8.1.14

The Infrastructure Planning (Examination Procedure) Rules 2010

Rules 8(1)(c)

Contents

Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 2

The Applicant's Responses to Local Impact Reports

Prepared by
Name: Stephen Flynn
Job title: Senior Planner

Approved by
Name: Jane Crichton
Job title: Associate Planning Director

Revision	Date	Prepared by	Approved by
Original	19/11/2025	SF	JC

1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides Green Hill Solar Farm Limited (the 'Applicant's') response to the Local Impact Reports (LIRs), relating to the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').

1.1.2 The LIRs were submitted to the Planning Inspectorate at Deadline 1 (07 November 2025) from the following local authorities:

- Milton Keynes City Council (MKCC) **[REP1-169]**
- North Northamptonshire Council (NNC) **[REP1-171]**
- West Northamptonshire Council (WNC) **[REP1-175]**

1.1.3 The LIRs were published on 12 November 2025 to the Planning Inspectorate's website (PINS Reference: EN010170).

1.1.4 Local authorities have worked proactively with the Applicant during the preparation of the Application and since its submission and the Applicant thanks officers for their time.

1.1.5 Sections 2-4 below sets out comments made by the above Local Authorities in their LIRs and the Applicant's responses to them. Where applicable, paragraph or page numbers are provided to assist cross referencing to the relevant LIR.

1.1.6 Where paragraphs or sections of the LIR have not been included, this has been done where the Applicant does not have any commentary to make on the text provided. This is done only for passages where the LIR refers to factual statements, repetition of text from the Applicant's documents, or where directly quoting local policy or guidance to which the Applicant has responded to through the submission.

1.1.7 References to the Application and examination documentation, as submitted to the Planning Inspectorate on 23 May 2025, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'Green Hill Solar Farm Examination Library'. Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 1 to the Planning Inspectorate.

Table 1: List of Acronyms for Submission Documents

Acronym	Document Name
DCO	Development Consent Order
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
PRA	Preliminary (Geo-Environmental) Risk Assessment
OCEMP	Outline Construction Environmental Management Plan

Acronym	Document Name
OOEMP	Outline Operational Environmental Management Plan
ODS	Outline Decommissioning Statement
OLEMP	Outline Landscape and Ecological Management Plan
OEPMS	Outline Ecological Protection and Mitigation Strategy
OSMP	Outline Soil Management Plan
OBSSMP	Outline Battery Storage Safety Management Plan
OSSCEP	Outline Skills Supply Chain and Employment Plan
OCTMP	Outline Construction Traffic Management Plan
OPROWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
CDPP	Concept Design Parameters and Principles
EqIA	Equality Impact Assessment
HRA	Habitat Regulations Assessment
OOTMP	Outline Operational Traffic Management Plan

2 The Applicant's Responses to Milton Keynes City Council Local Impact Report

Table 2: Applicant's Response to [REP1-169]

LIR Ref.	Topic Area	Summary	Applicant's Response
MKC-1.1 to 1.5	General Matters	The content of this section has not been copied across from the original submission document.	The Applicant notes these comments.
MKC-2.1 to 2.4	General Matters	The content of this section has not been copied across from the original submission document.	The Applicant notes these comments.
MKC-3.1 to 3.5	Energy Need and Policy	The content of this section has not been copied across from the original submission document.	The Applicant notes the contents of this section of the LIR prepared by MKC and does not wish to provide additional comment at this stage.
MKC-3.6 to 3.7	Energy Need and Policy	The Milton Keynes City Plan 2050 (MKCP) is also a material consideration. The first round of consultation closed on 9 October 2024. At the time of writing, a decision is scheduled to be made as to whether to proceed with the Regulation 19 consultation, with this intended to take place over November and December 2025. In accordance with paragraph 49 of the NPPF, weight can be given to emerging policies depending on the stage of preparation of the plan, the extent to which there are unresolved objections and their consistency with the NPPF. Owing to the current status of the emerging Milton Keynes City Plan and depending on the time it takes to complete the examination, the Inspector may need to seek a view from the Council as to the degree of weight which should be afforded to these policies, at the time of the decision. The following policies are relevant:	The Applicant acknowledges that the MK City Plan 2050 Regulation 19 consultation commenced on the 7 November for a six-week period. The Applicant has prepared an update to the **Planning Statement Revision A [EX2/GH7.15_A]** and the **Policy Compliance Document Revision A [EX2/GH7.23_A]** to reflect the update to the policy position. The Applicant is proposing to prepare a representation for submission into the Local Plan consultation in due course.

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Policy GS6: Open Countryside • Policy GS7: Wind Turbine and Solar PV Spatial Strategy • Policy GS10: Movement and Access • Policy CEA6: Low and Zero Carbon Energy Provision • Policy CEA7: Mitigating Wider Environmental Pollution • Policy CEA9: Biodiversity and Habitats Network • Policy CEA10: Protection and Enhancement of Environmental Infrastructure Network, Priority Species and Priority Habitats • Policy CEA11: Urban Greening, Trees and Woodland • Policy CEA12: Conserving and Enhancing Landscape Character/Special Landscape Areas • Policy CEA13: Sustainable Drainage Systems (SuDS) and Integrated Flood Risk Management • Policy CEA14: Protecting and Enhancing Watercourses • Policy CEA15: Managing Flood Risk • Policy ECP5: Heritage The following evidence from the emerging Milton Keynes City Plan is also of relevance:	

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Milton Keynes Review of Local Landscape Designations report (2024) • Milton Keynes Landscape Character Assessment (2022	
MKC-4.1	General Matters	The ES and supporting documentation sets out a wide-ranging assessment of the development proposal, its impacts and proposed mitigation measures. MKCC accepts that the chapters of the ES address the range of issues that are of a local concern to the authority. The following section sets out the Council's view of the local impacts of the development.	The Applicant notes this comment.
MKC-4.7	Landscape and Visual Impact	The proposed development would see the introduction of a large-scale solar farm which would result in landscape and visual effects over an extensive area which is currently undeveloped agricultural land. The solar PV panels on the south facing slopes will be highly visible from the roundabout intersection of the A428 and A509. The proposal is of an industrial scale and would introduce an urbanising feature into this area of open countryside. It should be noted that the presence of electricity pylons, which are visually passive and have a small footprint, does not mean the existing quality of the landscape is significantly diminished. The introduction of a solar panels, being large, solid and reflective surface, raised above the ground, and potentially moving with the sun, introduces a more industrialising feature to the landscape than the existing pylons.	**ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]** includes an assessment of visual effects from both the A428 Northamptonshire Road (TR015) and the A509 (TR014, TR016, TR017) concluding that for users of the A428 (which includes the roundabout at this intersection) that there would be Significant Adverse visual effects until the hedgerow enhancement alongside the Site boundary with the A428 had established. Landscape proposals include for the planting of a secondary native species rich hedgerow with densely spaced native hedgerow trees along the length of the A428.Prior to their establishment, there would be direct, transient and filtered views of construction activities and once complete, of the array within the adjacent sections of Green Hill G, notably field GF10 for users of the roundabout, with the wider fields within Site G screened by changes in landform.

LIR Ref.	Topic Area	Summary	Applicant's Response
			The LVIA takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons are set out below: 1. Dispersed nature of the Sites: The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. 2. Nature of Scheme being 'overlaid' and reversable: For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' on the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and

LIR Ref.	Topic Area	Summary	Applicant's Response
			continue to contribute to the landscape character of the receiving area. 3. Strong framework of existing vegetation: The strong framework of existing vegetation means that this would provide the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. 4. The benefits of mitigation: By Year 15, new planting would be established and helping mitigate adverse effects.. Please refer to the LVIA specifically Table 8.10 which sets out the Planting Typologies utilised within the Landscape and Ecology Mitigation Plans and Table 8.11 of the LVIA which sets out the quantity of landscape enhancements the Scheme would provide: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.13km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and • 1,079.6ha of groundcover.

LIR Ref.	Topic Area	Summary	Applicant's Response
			5. Biodiversity Net Gain: In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver additional enhancement and connections to wider ecological networks as well as contributing to the enhancement of the quality of the landscape going well beyond biodiversity net gain. 6. Legacy Landscape: Legacy Landscape is where, because of the development, the landscape would be left in a better condition than at present. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. It is also noted that, whilst the Scheme would utilise currently undeveloped agricultural land, the area has been selected in the emerging Milton Keynes City Plan as a Development Area for Solar. At decommissioning, agricultural fields would be returned back to agriculture. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing

LIR Ref.	Topic Area	Summary	Applicant's Response
			the overall character and providing considerable biodiversity benefits over the years. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
MKC-4.8	Landscape and Visual Impact	As set out in the Landscape Character Assessment, Site G is within two Landscape Character Areas (LCAs). These are the LCA 1a Yardley Chase Wooded Wolds; described as gently undulating plateau with some woodland blocks, mainly in arable use, and LCA 2a Ouse Northern Undulating Valley Slopes, a gently sloping landscape mainly in arable use, with limited modern development.	The Applicant notes this comment.
MKC-4.9	Landscape and Visual Impact	Two field parcels within Site G (GF9 and GF13, east of Lavendon Bridleway BW15) impinge on land identified as locally attractive landscape and proposed as part of the Ouse Valley Special Landscape Area (SLA) under the MKCP, as informed by the Milton Keynes Review of Local Landscape Designations report (May 2024). It is considered that the development of these two parcels would be detrimental to the cohesiveness of the proposed SLA, which were proposed to be included to include the historic villages and surroundings within the north of the borough. Including these two parcels as part of the development would therefore be detrimental to the character of the SLA, given the industrialising nature of	The Applicant notes this comment. It is acknowledged by Officers at MKCC that Site G, including fields GF9 and GF13 are located in an area identified as a suitable location for solar development, set out in EMKLP Policy GS7. The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting, helping to protect and enhance the landscape through the landscape- led design.

LIR Ref.	Topic Area	Summary	Applicant's Response
		the development, in this location where it would be highly visible on the landscape, particularly in the area around Lavendon.	The nature of solar developments results in infrastructure being 'overlaid' on the landscape and reversable. For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' across the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. The strong framework of existing vegetation across Site G would provide the structure for the Scheme to be set comfortably and not become wholly intrusive within the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate into the countryside surrounding Lavendon. The LVIA takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The MKCP is currently at Reg 19 Consultation where emerging policies carry minimum weight. As set out within the LIR, it is acknowledged that the Inspector may need to seek a view from the Council as to

LIR Ref.	Topic Area	Summary	Applicant's Response
			the degree of weight which should be afforded to these policies, at the time of the decision. The Applicant will be providing a formal response to the proposed SLA during the Reg 19 Consultation.
MKC-4.10 to 4.11	Landscape and Visual Impact	Further mitigation measures would reduce the visual harm. However, the success of this screening would be dependent on a number of factors, including speed of plant growth, and this mitigation would take a number of years to fully establish and cannot be relied upon to provide permanent screening or mitigation. Mitigation measures along the A428 south of the pylons which intersect parcel GF13 (viewpoint VP53), as well as along the edge of parcels GF10 and GF12 towards the north, and westwards from the Milton Keynes Boundary Walk, should be bolstered by the inclusion of further Native Woodland Copse/Shelter Belt (shrub and tree planting) instead of the proposed hedgerow. Further screening should also be introduced where BW15 crosses the A428. Without these changes, the proposal would fail to demonstrate adequate mitigation in line with Policy NE5 of Plan:MK. Overall, the local effect on landscape and visual impact is a significant negative impact, with the potential for this to become minor negative/neutral following the inclusion of further mitigation in the form of additional planting and landscaping.	The successful delivery, establishment and long-term management of mitigation proposals would be secured within the DCO through the requirement of the delivery of a detailed Landscape and Ecological Management Plan for the lifetime of the Scheme. The design of the Scheme has undergone an iterative development process involving collaboration between the Applicant, design team, and the environmental consultant team. This process has been informed by feedback received through various consultation activities, including engagement with stakeholders, statutory consultees, host authorities, local communities, and residents. The **Design Approach Document [APP-560]** demonstrates how the fundamental principles of good design have been embedded throughout the Scheme, which has been shaped by a series of design principles and parameters. These principles include, for example, a landscape-led approach, application of the mitigation hierarchy and delivery of biodiversity net gain. The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character

LIR Ref.	Topic Area	Summary	Applicant's Response
			and setting, helping to protect and enhance the landscape through the landscape- led design. Mitigation planting along the A428 (TR015) is for proposed secondary native species rich hedgerow with densely spaced native hedgerow trees. Once established the hedgerow enhancement along the road side, combined with allowing the existing hedgerow to reach a target height of up to 4.5m would screen views of Scheme reducing effects to no longer being Significant. The Milton Keynes Boundary Walk passes along PRoW MK|Lavendon|005 (TP215) and MK|Lavendon|002 (TP217). The landscape proposals have responded to this Recreational Route by seeking to create a green corridor for users of this route to pass along within the Site. Where PRoW MK|Lavendon|005 (TP215) passes through the middle of the Site, panels have been set back approximately 35m within the adjacent field to the east (GF6). This corridor has then been utilised for new native woodland copse and shelterbelt planting to provide users with separation from the array and an attractive green corridor to pass through. To the west, on the opposite side of the existing water course, panels have been set back by between approximately 15m to 25m. Along the western side of the water course is proposed river corridor planting for flooding further reinforcing the green corridor through the site and providing greater screening of panels within the adjacent fields to the west and south of the PRoW. The Milton Keynes Boundary Walk follows PRoW MK|Lavendon|002 (TP217) along the eastern side of GF6

LIR Ref.	Topic Area	Summary	Applicant's Response
			adjacent to the Three Sires Wood. Panels have been set back between 25m and 55m from this section or PRoW to create a green corridor for users to pass along within the Site. Here the landscape proposals are for a proposed new hedgerow with irregularly spaced hedgerow trees providing enclosure and separation from the array. Views of proposed infrastructure would be screened by proposed mitigation planting along the western side of the PRoW. The new planting would lead to an enclosure of views along this route resulting in a loss of the wider open views of the surrounding countryside. However, the new planting would form an attractive green route alongside the array. The mitigation measures set out above and as shown on **ES Figure 4.20 Landscape and Ecology Mitigation Plan G [APP-219]** are considered appropriate mitigation measures and appropriate interventions in consideration of long term legacy landscape as set out within the response to MKC-4.7.
MKC-4.15	Ecology and Biodiversity	There is concern regarding the lack of night-time bat walkover surveys, given the rarity of Barbastelle bats and the high number of passes recorded within Site G. There are also limitations associated with only collating data for 1 year, as this cannot determine long-term population trends or annual variations caused by varying weather conditions. More data is required to make an accurate assessment of potential impact on Barbastelle.	Night-time bat walkover surveys are typically conducted to supplement the deployment of automated static detectors (the latter being the method of data collection utilised by the Applicant for this Scheme). The aim of night-time bat walkovers is to try to identify key foraging areas, commuting routes, or roost sites; this is important where such habitats are being impacted. Given the scale of the Scheme, and the retention and protection of the boundary habitats and other sensitive habitats (such as woodlands) through embedded mitigation measures, carrying out

LIR Ref.	Topic Area	Summary	Applicant's Response
			night-time bat walkovers was not considered proportionate or likely to add meaningful data which would affect the mitigation recommendations or Scheme design. Concurrently, considering the footprint of the Scheme and the other factors detailed above, it was not proportionate to determine 'long term population trends or annual variations', and this data would be unlikely to influence the design of the Scheme. The bat survey scope completed by the Applicant was confirmed as appropriate by Natural England at an early stage in the Scheme's development through their Discretionary Advice Service. With regard to Barbastelle bats specifically, this is a species predominantly of woodland habitats, which are being retained almost in full (**ES Chapter 9: Ecology and Biodiversity (Revision A) [REP1-033]** refers). Barbastelle bats are considered highly unlikely to have made use of the arable fields present within Green Hill G at baseline, given their poor foraging value for bats. The retention of the woodlands and retention/enhancement of the boundary habitats with wide buffer zones is considered to avoid impacts to this species, and provide habitat of increased value for Barbastelle bats and other bat species, relative to the baseline.
MKC-4.16 to 4.17	Ecology and Biodiversity	The proposed compensation strategy mitigating for the loss of Skylark territories would result in the displacement of 55.5% of recorded Skylark species across the whole application site. No information appears to have been gathered to establish whether surrounding land would be capable of absorbing the displaced pairs or whether this would have additional impacts on the wider population. It	The Scheme will result in the displacement of skylarks from fields within the Sites by virtue of the installation of panels. However, it is reasoned that, where suitable nesting habitat exists adjacent, a proportion of skylark territories at the edges of the Sites may persist and be 'absorbed' by nesting within adjacent land and foraging within the Sites. Once established post-construction, the

LIR Ref.	Topic Area	Summary	Applicant's Response
		cannot be assumed that surrounding land would be capable of absorbing the displaced pairs. The assumption that the loss of nesting opportunities will be offset by the increase in foraging opportunities is strongly disputed as both foraging and nesting opportunities are of equal importance for the survival of the population. One cannot replace the other and both are required to successfully maintain or increase the population. Whilst increasing foraging opportunities would constitute an enhancement and may have significant benefits to the population if foraging resource is currently a limiting factor to population growth (which is unknown); it cannot be used to compensate for the loss of nesting opportunities under the proposals as foraging resources and nesting opportunities provide different functions in a Skylark lifecycle. If the nesting resource is reduced by over 50% then the availability of nesting opportunities may become the limiting factor in maintaining the population and therefore, the proposals would likely to have a negative impact on the population regardless of how much foraging resource is provided. It is therefore argued that additional mitigation and compensation is required to ensure adequate compensation for the loss of nesting opportunities. Currently there would be harmful impacts on these species and it is questioned whether the proposal is currently compliant with policy NE2.	enhanced habitats within the Sites will confer elevated foraging resources relative to the baseline arable fields; skylark territories at the Site's edges may take advantage of these foraging resources and adjacent fields would thereby be able to support an increased density of territories. The argument in the LIR fails to factor in the effect of an increased carrying capacity on the neighbouring undeveloped arable land owing to access to enhanced foraging resources, which would lead to the same area of land being able to support a greater density of territories. Only those territories which have been displaced at the edge of the Sites, and where suitable nesting habitat exists adjacent, have been assumed to be 'absorbed' on this basis. Surveying surrounding land was not conducted as this would have been disproportionate, but the existing habitats and suitability for nesting were appraised through examining satellite imagery. Additionally, designated mitigation fields within the Sites have been retained, which will be managed to host an increased density of nesting pairs, relative to the baseline habitats within those fields. By these two means, a substantial proportion of the skylark territories displaced from the Sites will be mitigated. Nonetheless, the **ES Chapter 9: Ecology and Biodiversity (Revision A) [REP1-033]** concludes that there will be a residual adverse effect through the permanent displacement of a significant proportion of the skylark population. With regard to 4.17, this is not suggested by the Applicant; as per the response above, the mitigation calculations are

LIR Ref.	Topic Area	Summary	Applicant's Response
			based on the absorption of a proportion of territories by virtue of increased foraging resources allowing an increased territory density to be supported by suitable adjacent nesting habitat. The territory density (carrying capacity) of a habitat, especially in an arable setting, is typically limited by foraging resources and not by nesting opportunities. Research into the territory density supported by different habitat types has been conducted (Fox, 2022) which sets out this rationale. **Reference**: Fox, H. (2022). Blithe Spirit: Are Skylarks Being Overlooked in Impact Assessment? *In Practice, Chartered Institute of Ecology and Environmental Management* (Issue 117, pp.47-51).
MKC-4.18	Ecology and Biodiversity	It is recognised that the applicant could enter into a District License scheme for Great Crested Newt (GCN) mitigation. However, this is optional, and the applicant is likely to choose to enter into the Natural England Protected Species licence, for all necessary licences, given the size of the site.	The Applicant has committed to registering under the NatureSpace District Licensing scheme, which offers the most pragmatic solution to licensing and great crested newt mitigation for the Scheme. This is clearly stated in the **ES Chapter 9: Ecology and Biodiversity (Revision A) [REP1-033]**. A District Licence report and Impact Plan issued by NatureSpace will be submitted during DCO Examination, and the application of this licence will be secured as covered by the Protected Species Licence in the **Consents and Agreement Position Statement Revision A [REP1-149]**.
MKC-4.19 to 4.20	Ecology and Biodiversity	The Council welcomes the commitment to delivering Biodiversity Net Gain (BNG) and considers that these commitments would need to be secured within the DCO. However, the Council's Biodiversity SPD sets out that faunal enhancement measures such as inclusion of bat	'Biodiversity Net Gain' (BNG) is considered as a concept in its own right, as this is a defined, numerical metric based on the quantum of different habitat types pre and post-development; the **ES Appendix 9.13: BNG Assessment (Revision A) [REP1-043]** sets out this assessment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		and bird boxes are as important as providing an overall net gain for biodiversity as they provide additional roosting or nesting opportunities which complement the additional resources provided through habitat creation. A lack of faunal enhancements would result in minor negative impacts to the bird and bat species, however given that there would be an overall BNG, the proposal would be compliant with policy NE3 of Plan:MK. Overall, the Council's position is that there is potentially a negative impact from an ecological perspective without further information or mitigation measures applied. However, if further information and mitigation can be provided as described above, there is potential for the overall impacts to be neutral-positive.	Other ecological enhancements, such as bat and bird boxes or the creation of specific habitats or features, are considered separately and set out within the **ES Chapter 9: Ecology and Biodiversity (Revision A) [REP1-033]** under each ecological feature's subheading. In addition, the bat and bird boxes and other ecological enhancement features that will be implemented as a result of the Scheme are detailed in **Section 4.10: Habitat Boxes & Wildlife Enhancement Features** of the **OLEMP (Revision A) [REP1-137]**. A range of targeted features are proposed to benefit species of local or national conservation concern, in line with the NPPF and local policy. The suggestion that a lack of enhancements would result in minor negative impacts is refuted; enhancements by definition are improvements to the baseline and not mitigation for impacts.
MKC – 4.24 to 4.27	Hydrology and Flood Risk	Solar farms are considered to have low risk to surface water when mitigation measures are in place. The site is almost entirely in Flood Zone 1, save for narrow buffers of Flood Zone 2 and 3, and at risk of surface water flooding, around the existing drains/watercourses on site, where no development is proposed. It is therefore clear that a sequential approach has been taken with regard to the developable area within Site G, and that a sequential test need not be applied. In any case, the solar panels will be mounted on frames and raised above ground level allowing any surface water to flow freely underneath, with a 9m buffer around watercourses maintained. Therefore,	The **FRADS (Revision A) [REP1-053]** and **Annex I (Green Hill G) [APP-107]** confirm that all development lies in Flood Zone 1, with only narrow buffers of Flood Zones 2 and 3 adjacent to existing land drains. No infrastructure is located within these areas, and a 9 m undeveloped buffer to each ordinary watercourse is maintained, consistent with Policy FR1 of Plan:MK and the NPPF sequential approach. A bespoke hydraulic model was developed for the Lavendon catchment to assess potential interactions between the Scheme and downstream flood risk. Multiple iterations and design options were tested within the

LIR Ref.	Topic Area	Summary	Applicant's Response
		there will be no loss of floodplain volume as a result of the development and no increase in flood risk elsewhere. It is recognised that the village of Lavendon, directly to the south, suffers from flood risk problems. It is understood that flood risk modelling is being undertaken separate to the DCO process to consider the potential impacts on the village of Lavendon, and any potentially betterment that could be provided. Although details of this have not been provided, it is considered that it could represent a positive benefit of the scheme, but there appear to be no further detail of this work at this stage. The Council has been working on proposals to improve the situation in Lavendon. However, the ES sets out that the 'Flood Alleviation Scheme' is no longer going ahead and therefore has not been considered within the ES. However, the Lead Local Flood Authority (LLFA)advises that they are currently seeking to develop a Flood Alleviation Scheme for Lavendon, and therefore this statement is not correct. If the applicant is able to provide betterment, as part of their continued flood risk modelling, then this should be discussed further with the LLFA. Overall, the local impact in terms for flood risk is considered to be neutral.	confines of the Order Limits to explore whether on-site measures could reduce flood risk in Lavendon. None of the options provided any meaningful improvement in flood levels or extents. The modelling confirmed that the Scheme neither increases nor materially influences existing flood mechanisms. The results of this Lavendon modelling **[EX2/GH8.2.3]** is submitted at Deadline 2. Solar panels are raised to allow overland flow, and runoff from the 1 in 100-year + 40 % climate-change event will be managed within the site through infiltration or controlled discharge in line with the Milton Keynes Drainage Strategy (2004). The Scheme therefore results in no loss of floodplain storage or increase in flood risk elsewhere. The Applicant remains open to engagement with the LLFA on any future flood alleviation schemes should opportunities for off-site betterment arise.
MKC – 4.28 to 4.29	Minerals	The MLP sets out the principles to guide future working of minerals within Milton Keynes until 2032. It also sets out policies against which applications will be considered. It seeks to ensure the protection of mineral resources	The Applicant notes these comments

LIR Ref.	Topic Area	Summary	Applicant's Response
		from the risk of sterilisation by development which potentially prevents future extraction. The minerals resource map identifies three mineral resources within the vicinity of Site G. These areas are, however, outside the Primary and Secondary Focus Areas for mineral extraction designated by the MLP. It has been identified that the proposal would affect the three areas of safeguarded mineral reserves and areas identified to potentially contribute towards future mineral supply. However, it is also noted that working Site G for minerals would be constrained by highway infrastructure, nearby built development, public rights of way (PRoW), as well as the outcome of an assessment of Best and Most Versatile (BMV) agricultural land, and the fact that Site G is not currently allocated for extraction to serve current supply needs. In any case, it is considered that temporary sterilisation of these deposits during the operational phase would not have an impact on the short-to-medium term aggregate supply within Milton Keynes – particularly as the majority of the site falls beyond and safeguarding afforded by the MLP, further making extraction unlikely. The short and long-term impacts on minerals supply is therefore neutral.	
MKC – 4.30 to 4.33	Cultural Heritage	Policy HE1 of Plan:MK sets out that proposals will be supported where they sustain, and where possible, enhance the significance of heritage assets which are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance. Permission for proposals that cause less than substantial harm to a designated heritage asset will	The Applicant notes policy HE1 of Plan:MK. The Applicant agrees that the part of the Scheme within the planning authority of Milton Keynes (Site G) would not impact on the setting of Listed Buildings or the Lavendon Conservation Area. As such, no significant effects have been identified as a result of Site G to any heritage assets

LIR Ref.	Topic Area	Summary	Applicant's Response
		only be granted where the harm is demonstrably outweighed by public benefits delivered by the scheme. Policy CD1 of LNP also reflects the principles of the above policy, reinforcing the principles of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposal would not have any impact upon the setting of nearby listed buildings or upon the Lavendon Conservation Area. A total of 10 Historical Landscape Character areas have been mapped within Site G. An Archaeological Mitigation Strategy has been developed following the archaeological evaluation. Paragraph 12.6.33 of the ES identifies that 46 archaeological assets have been identified within Site G. The impacts on these assets would occur during the construction phase during the installation of the panels and cable routes. The Council's Archaeologist is satisfied that the scope of the assessment carried out and field evaluation are appropriate and the mitigation strategy is acceptable, subject to its implementation being secured by a suitably worded condition. The local impact is therefore considered to be neutral.	(see **ES Appendix 12.9: Cultural Heritage Impact Assessment Tables [APP-149]**). The Applicant acknowledges that the Milton Keynes Archaeologist is in agreement that the scope of the archaeological assessment and evaluation are appropriate and the mitigation strategy is acceptable. This is secured through Requirement 12 in schedule 2 of the **Draft DCO Revision A [REP1-008].**
MKC – 4.37 to 4.42	Transport and Access	As part of the proposal, the proposed cable route corridor passes Site F through agricultural fields, crosses the A509 and enters Site G within MKCC. Another construction and maintenance vehicle access (access G-	In respect of the access from the A428, an updated drawing was provided at Deadline 1 appended to the **Transport and Access Routes Supporting Document [REP1-167]** at Appendix B. The updated drawing removed the HGV swept path assessments that are not associated with the proposed HGV route. As such, the matter of

LIR Ref.	Topic Area	Summary	Applicant's Response
		1) is proposed from the A428, which would see the improvement of an existing field access. The traffic movement forecast demonstrates an anticipated 8 HGV trips on average, with a peak of 18 two-way movements during construction. The applicant's routing plan clarifies that normal construction HGV traffic will enter the site from the north via the A509 and A428 (i.e. not through Lavendon, or Olney) from the A45. MKCC consider this acceptable as the preferred route for HGV to limit impacts on surrounding villages. There would be 2 abnormal loads to site G, accessed from the A428 (access G-1) during construction; however, the impacts of these would be minimal and controlled to the two specific times during construction. It is noted that one of the specified routes for these abnormal loads is from Junction 14 of the M1 and through Olney, which has the potential to cause some localised impacts during these limited specific times. Provided this is managed effectively, the impacts would be short-term and limited. The A428 access uses an existing field access which would be improved to 6.0m width with 6m radii. The full visibility splays for a 60mph road are available and the tracking for a large articulated lorry is provided. This is only for left in and left out, although these are the tightest movements. The left out is slightly contradictory as HGVs are meant to be travelling towards the A509 rather than left towards Lavendon, however it is accepted that this	vehicles using the full width of the road on exit from Green Hill G as highlighted by the highway authority is addressed where the movement has now been removed. The **OCTMP [REP1-145]** contains measures for controls at access points. Banksman can be used at access points to ensure drivers only approach the junction on egress from the site when appropriate to do so. This approach can manage movements entering and leaving site and reduce instances of conflict. The order limits allows a wider access to be implemented should this be considered necessary. We note the comment around the access to the Cable Route Corridor from the A509. Peak HGV arrivals would be 11 per day during the haul road construction. Whilst the precise requirements will be determined by the contractor and detailed construction programme not all of these movements would be made by full sized articulated vehicles, with smaller rigid vehicles transporting materials being more common for the haul road construction. Outside of the peak construction period, overall vehicle movements will be lower in number.

LIR Ref.	Topic Area	Summary	Applicant's Response
		adequately demonstrates the tracking and that the routing plan is clear. The key point here is that the tracking shows for the left in the full width of the access is required to make the movement so 2 HGVs or an HGV and a car or van could not enter and leave at the same time. This could cause waiting on the highway, although this situation is unlikely. Given the number of movements anticipated, conflict would not be frequent but is possible. It is not desirable for an HGV to have to wait unnecessarily on a main A road (A428), so it is suggested that this access should be further improved to allow two vehicles to pass at the same time. Similarly, for the left out movement, the vehicle has to make use of the full width of the A428 so improvements to the access would be required to address highway safety concerns and reduce the risk of potential collisions. The A509 access is an improved existing field access. This access is for the cable route corridor and so although the number of HGV movements is not specifically given, it is assumed it will be low as it doesn't provide an access to the cable route construction compounds. Full visibility splays are available, but it is noted that for large vehicles leaving the site the full width of the A509 is required. It would need to be confirmed that very few large articulated lorries would make this movement. If this is the case, this should be acceptable and the impacts would be minimal. Without this confirmation, it is not possible to fully determine whether	

LIR Ref.	Topic Area	Summary	Applicant's Response
		the proposal would provide a safe access, and whether this would result in impacts on highway safety.	
MKC – 4.43 to 4.45	Transport and Access	In terms of employees working at the site during construction, workers who come from afar and stay at local hotels would be transported to the sites via a shuttle bus, it is anticipated that this would account for approximately half of all employees. The routing plan shows that employee movements could be in both directions along the A509 and A428, including potential travel through Lavendon and Olney. A robust analysis of traffic impact and justification should be provided, including likely hotel locations. It is not clear at this stage whether hotel accommodation is more likely to be in Northampton or Wellingborough, being closer to Sites A-F and in the necessitating travel north from Site G, or whether hotels in Milton Keynes might be used, which would require travel through Olney. Based on this information, Site G is forecast to generate 124 two-way movements per day made up of 114 cars/vans and 10 shuttles which has the potential to impact highway capacity during construction. There are further calculations for the 3 cable route compounds given in table 5.3 of the ES. Each generate 2 shuttle trips, 16 car/vans and 22 HGVs. In conclusion, it is acknowledged that vehicle movements to and from the site are only notable during the construction period and are likely to be fairly modest, with minimal impact on a localised level in terms of vehicle turning and access.	As noted, hotels across various settlements may be utilised by construction workers. The flexibility in this regard is reflected by the routing at the access points allowing movements from all directions. As noted, Table 5.2 of **ES Appendix 13.2 Transport Assessment Part 1 of 3 [APP-151]** identifies that peak daily construction movements for Site G will comprise 124 movements. These are two-way movements which will be spread across the day. In respect of worker shuttle and car and van movements, these movements will be controlled such that network peak hours are avoided wherever practicable. The commitment to prepare a Construction Worker Travel Plan is made in the **OCTMP (Revision A) [REP1-145]**. The use of shuttle buses is common across large-scale construction sites. The principle of providing these facilities for workers, not all of whom will have access to a private vehicle, is established through other solar proposals that have been examined through the DCO process. The 50% figure is usual. The following considerations of the proportion of workers that will use shuttle buses to access various Solar Schemes have been made for Schemes approved through the DCO process: • Gate Burton Energy Park - 55%

LIR Ref.	Topic Area	Summary	Applicant's Response
			• Beacon Fen Energy Park - 55% • Tillbridge Solar Project - 47% • West Burton Solar Project - 50% • Stonestreet Green Solar - 75% • Longfield Solar Farm - 55% • Cottam Solar Project - 50% Additionally, the need to minimise the scale of compound space within each Site will necessitate the use of shuttles to minimise as far as practicable the number of vehicles that need to be accommodated. It would not be reasonable to provide a compound area that assumes a vehicle per construction worker.
MKC – 4.46 to 4.49	Transport and Access	Before the level of impact on the broader highway network can be agreed a more robust approach to traffic generation is required. In particular, with reference to a very high percentage of workers coming by shuttle bus. Further the A428 access into Site G requires further improvement to allow two vehicles to pass. The Public Rights of Way (PRoWs) that cross the site have all been identified and appropriate measures are outlined within the proposals to ensure they will remain usable. The commitment to keep PRoWs open as much as possible during the construction phase is seen as the appropriate manner with which to undertake this scheme. The proposals outline where work can be undertaken overnight or over a short duration, and this is welcomed. The suggestions within the application around buffer	Please note the comments made against LIR Ref. MKC – 4.43 to 4.45 in respect of the access and traffic movement comments. The wider points are noted.

LIR Ref.	Topic Area	Summary	Applicant's Response
		zones and repairing any issues caused as soon as practical are all noted and supported. The provision of two permissive paths (covered in paragraphs 4.2.18 to 4.2.19 of the ES) is positive and provides a social benefit of the scheme to the public. This provides an example of a scheme taking an opportunity to provide better access facilities for users as set out within NPPF paragraph 105 and point A.8 of Policy CT2 of Plan:MK. Therefore, in terms of local impacts there is likely to be a minor-moderate negative impact on local traffic and the highway network during construction, depending on whether the observations set out above can be addressed. However, during the operational phase, it is considered that there will be a positive benefit to countryside access through the provision of new permissive paths through the site.	
MKC – 4.50 to 4.51	Noise and Vibration	Policy NE6 of Plan:MK seeks to ensure that development will not have an unacceptable impact with regard to noise and vibration on sensitive receptors, including not permitting proposals which would adversely effect the tranquillity of the countryside. It is agreed that impacts during the construction and operational phases will be moderate to minor, and that impacts at receptors in the vicinity of Site G will be negligible to low, compared to the site's current agricultural use. The Council's Environmental Health Officer agrees that there are no sensitive receptors within the vicinity of Site G, and therefore the impact will not be	The Applicant notes these comments.

LIR Ref.	Topic Area	Summary	Applicant's Response
		significant. The local impact overall with regard to noise and vibration is therefore considered to be neutral.	
MKC – 4.52 to 4.54	Human Health	Policy NE6 of Plan:MK seeks to ensure that development will not have an unacceptable impact on human health, groundwater, general amenity, biodiversity or the wider natural environment. Chapter 18 of the ES specifically addresses the impact of the proposal on human health, and this consideration is welcomed. However, the Council's Public Health team raise concerns relating to mental health mitigation. The information sets out that a Community Liaison Manager will be recruited. However, the extent of their role is not clear, and whether they would be present during the construction phase and whether they would have influence over works carried out. Given that this is a key mitigation of mental health impacts for the proposal, further information is required to fully determine the impact on human health. With regard to physical health, it is acknowledged that PRoWs within Site G are not proposed to be closed during construction, with any temporary closures being overnight, ensuing that the PRoWs can be used for recreation throughout the lifetime for the development. Nonetheless, it must also be acknowledged that construction traffic, noise and disruption works may deter existing users of the PRoW for a short time. However, in the long term, the additional permissive paths through the site will provide more walking routes for users of this area of the countryside.	The Applicant confirms that no likely significant adverse effects to human health, including in respect of groundwater contamination, amenity, and in respect to interaction with biodiversity and the wider natural environment, have been identified in **ES Chapter 18: Human Health [APP-055]**. Therefore, the Applicant considers the Scheme complies with Policy NE6 of Plan:MK. The Applicant confirms that mental health considerations have been central to the assessment of human health impacts, and to the design of mitigation measures set out in the management documents. The provision of a Community Liaison Manager heading a community liaison group is secured through the **OCEMP Revision A [REP1-131]**, and secured through Requirements 4 and 13 of Schedule 2 to the **Draft DCO Revision A [REP1-008]**. The temporal scope of this role is from prior to construction, throughout construction works and until the Scheme is fully commissioned. The role of the Community Liaison Manager will be to: disseminate information relating to construction works, particularly those that effect activities; be a full-time community contact for ongoing consultation; and to be an intermediary between the public and site operators to ensure complaints or non-compliances reported by the public are actioned by the onsite constriction contractors.

LIR Ref.	Topic Area	Summary	Applicant's Response
			The Applicant confirms that mitigation measures to limit impacts to PRoWs for physical activity are secured through the **OPROWPPMP Revision A [REP1-147]** secured through Requirement 18 of Schedule 2 to the **Draft DCO Revision A [REP1-008]**. The Applicant acknowledges that works may deter PRoW users, and this has been assessed as a consideration of enjoyment and use of PRoWs in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and **ES Chapter 18: Human Health [APP-055]**. No significant effects to individual PRoWs in Milton Keynes City are assessed as likely to occur during construction. The Applicant furthermore confirms that the provision of permissive paths on this Site is secured through the operational lifetime of the Scheme.
MKC – 4.55 to 4.56	Arboriculture	Policy NE1 of Plan:MK seeks to prevent harm to irreplaceable habitat such as ancient woodland. Policy NE4 advises that the network of green infrastructure throughout the borough will be protected, extended and enhanced for its biodiversity, recreational, accessibility, health and landscape value and for the contribution it makes towards combating climate change. Policy E3 of the LNP supports the protection of trees and appropriate mitigation during construction. The Council's Tree Officer broadly agrees with the submitted statements in the ES. The Arboriculture chapter of the ES and Arboricultural Impact Assessment sets out a clear assessment of the trees on and surrounding Site G, including Threeshire Wood, which is considered ancient woodland. No trees are proposed to	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		be removed within Site G, and buffers between trees and developable areas are provided. Provided the works are undertaken in accordance with the Outline Arboricultural Method Statement and that the tree protection measures and works are carried out by a competent, qualified and experienced tree surgeon, it is considered that the impact on trees will be neutral.	
MKC – 4.57 to 4.59	Agricultural Circumstances	Policy NE7 seeks to protect BMV agricultural land, taking into account the economic and other benefits of the land. Development involving the loss of agricultural land should seek to use areas of poorer quality land in preference to that of higher quality unless other sustainability considerations suggest otherwise. The relevant ES chapter sets out the Site G is 33% Grade 2, 42.7% Grade 3a, and 24.3% Grade 3b, meaning BMV land totals 127.3 hectares (75.6%) of this site. This is a significant amount of agricultural land that would be unusable as arable land during the life of the project. This is assessed through the ES as moderate and minor adverse effects, with the loss of Grade 2 and 3a land being a significant impact. This is considered to weigh against the proposal to a modest degree. However, it is also agreed that the use of the site for a solar farm would not permanently sterilise the use of the site for agriculture in the future. It is also noted that the chemical properties of the soil may change during the lifetime of the development, with the nutrients and organic matter compositions being altered as a result of the siting of the panels caused by shading and altered management practices. The cessation of agricultural use	The Applicant notes that the Council agrees the conclusion of **ES Chapter 20: Agricultural Circumstances [APP-057]** and considers the loss of BMV agricultural land would be negative. However it should be noted, as acknowledged by the Council, that the conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term and would potentially have a Minor to Moderate (Significant) beneficial effect on agricultural land. In addition, it is considered that the 1200ha land for the proposed Sites would not have a significant impact on national food production and security as it only represents 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares of arable land in the UK. The Site G land can serve as a strategic land reserve underpinning national food security. It is also considered that soil chemical properties (soil nutrients) would be in balance during the lifetime of the Scheme as nutrient uptake from grass will be returned to soils from mown grass decomposition and sheep

LIR Ref.	Topic Area	Summary	Applicant's Response
		during the lifetime of the development could result in improvements to soil quality, provided that the recommendations for a Soil Management Plan are followed, which could result in minor to moderate benefits. The conclusions of this chapter are agreed, in that there will be some negative impacts for the operational phase of the projects, and the potential benefits following decommissioning. However, given the lifetime of the project, it is considered that the loss of BMV agricultural land would be negative.	droppings in situ.. Soil organic matter is expected to be increased due to grassland conversion and grazing.
MKC – 4.60	Other Matters	With regard to glint and glare, air quality, socio-economics, electro magnetic fields, ground conditions and contamination, and major accidents and disasters, or the Other Matters raised in Chapter 24 of the ES; the Council has no comments to make regarding local impact, subject to appropriate conditions.	The Applicant notes this comment.
MKC – 4.61	Cumulative Effects	With regard to cumulative impacts from the proposal, these are considered to be limited to those outlined in the ES chapter and otherwise covered in the individual chapters of the ES, and the Council has considered these impacts in the individual topic areas comments above. The Council considers that the applicant has considered the cumulative impacts across the affected areas to an appropriate level in order for a robust assessment to be made.	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
MKC – 5.1 to 5.3	Conclusions	This LIR has undertaken a consideration of the potential impacts of the Green Hill Solar Farm at the local level in respect of the Milton Keynes area. It has considered both positive and negative impacts, within the context of its knowledge and understanding of the area. In summary, MKCC consider that the following additional information is required to fully inform the decision: • Further bat surveys; • Additional viewpoint; • Further analysis of traffic generation, particularly with regard to number of cars, shuttles and hotel locations and likely routing. MKCC consider that the following aspects of the development at Site G should be secured, either through amendments or conditions as appropriate. If appropriate, the detail of these can be secured through the Statement of Common Ground: • Removal of fields GF9 and GF13 from the proposal; • Widening of the existing access, proposed for construction, off the A428 to ensure two-way traffic and reduce waiting on the highway; • Secure the proposed permissive paths between the existing PRoW as proposed in the application; • Increased landscaping to A428 and PRoW; and	The Applicant has responded to these comments in its above responses.

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Increase in faunal enhancements including bird and bat boxes.	
MKC – 5.4 to 5.5	Conclusions	Having regard to the above, MKCC have identified the following impacts, which can be summarised as follows: • Landscape and Visual Impact Assessment – negative impact; • Ecology and Biodiversity – negative impact- subject to the provision of further information and mitigation, potential for neutral-positive impact; • Hydrology, Flood Risk and Drainage - neutral impact; • Minerals - neutral impact; • Cultural Heritage - neutral impact; • Transport and Access – negative impact during construction, positive impact during operation; • Noise and Vibration – neutral impact; • Human Health – neutral impact; • Arboriculture – neutral impact; • Agricultural Circumstances – negative impact; and • Cumulative Effects – neutral impact. Where relevant, regard has been had to the public sector equality duty, as required by section 149 of the Equality Act 2010 and to local finance considerations (as far as it is material), as required by section 70(2) of the Town and Country Planning Act 1990 (as amended), as well as	The Applicant notes these comments.

LIR Ref.	Topic Area	Summary	Applicant's Response
		climate change and human rights legislation (including Article 8 and Article 1 of the First Protocol regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions).	

3 The Applicant's Responses to North Northamptonshire Council Local Impact Report

Table 3: Applicant's Response to [REP1-171]

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 1.1 to 1.4	Terms of Reference and Introduction	The content of this section has not been copied across from the original submission document.	The Applicant notes the contents of this section of the LIR prepared by NCC and does not wish to provide additional comment at this stage.
NNC 2.1 to 2.3	Local Context	The content of this section has not been copied across from the original submission document.	The Applicant notes the contents of this section of the LIR prepared by NCC and does not wish to provide additional comment at this stage.
NNC 3.1 to 3.7	Site Description and Surroundings	The content of this section has not been copied across from the original submission document.	The Applicant notes the contents of this section of the LIR prepared by NCC and does not wish to provide additional comment at this stage.
NNC 4.1	Planning History	There is no relevant planning history to be described within the Order Limits which primarily encompasses undeveloped farmland, woodland, watercourses and some areas of public highway. There is an existing energy storage facility within the Green Hill BESS site.	The Applicant notes the contents of this section of the LIR prepared by NCC. There is no existing energy storage facility within the Green Hill BESS site.
NNC 5.1	Description of Proposed Development	The content of this section has not been copied across from the original submission document.	The Applicant notes the contents of this section of the LIR prepared by NCC and does not wish to provide additional comment at this stage.
NNC 6.1 to 6.19	Planning Policy	The content of this section has not been copied across from the original submission document.	The Applicant notes the contents of this section of the LIR prepared by NCC and does not wish to provide additional comment at this stage.
NNC 7.1 to 6716	Principle of Development	Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		with the development plan unless material considerations indicate otherwise." Policy 1 of the JCS is clear that when considering development proposals, the local planning authority will take a positive approach that reflects the presumption in favour of sustainable development as set out within the revised NPPF. The UK Government's position on power is set out in the Overarching National Policy Statement (NPS) for Energy (EN-1), which recognises the importance of understanding and addressing landscape and visual impacts (Department for Energy Security & Net Zero, 2023). It includes a section on criteria for "good design" for energy infrastructure, which states that: *"Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."* Furthermore, Para 2.5.2 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) also states "Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage".	

LIR Ref.	Topic Area	Summary	Applicant's Response
		The NPPF advises that, when determining planning applications for renewable and low carbon development, local planning authorities should not require Applicants to demonstrate the overall need for renewable or low carbon energy (paragraph 168). The Government Guidance on renewable and low carbon energy highlights how increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable. Planning Practice Guidance (Paragraph: 013 Reference ID: 5-013-20150327) also sets out some of the particular planning considerations that relate to large scale ground-mounted solar photovoltaic farms. It states that "the deployment 11 of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively". The particular factors need to be considered include (but are not limited to): • Encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value; • Where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be	

LIR Ref.	Topic Area	Summary	Applicant's Response
		necessary and poorer quality land has been used in preference to higher quality land and (ii) the proposal allows for continued agricultural use where applicable and / or encourages biodiversity improvements around arrays; • That solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use; • The proposal's visual impact, the effect on landscape of glint and glare (see guidance on landscape assessment) and on neighbouring uses and aircraft safety; • The extent to which there may be additional impacts if solar arrays follow the daily movement of the sun; • The need for, and impact of, security measures such as lights and fencing; • great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset; • The potential to mitigate landscape and visual impacts through, for example, screening with native hedges;	

LIR Ref.	Topic Area	Summary	Applicant's Response
		• the energy generating potential, which can vary for a number of reasons including, latitude and aspect. It also states that the approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing the impact of wind turbines (Refer to Paragraph: 022 Reference ID: 5-022 20140306 & Paragraph: 023 Reference ID: 5-023-20140306). The JCS recognises that sensitively located renewable and low carbon energy generation will be supported consistent with the NPPF and Government Guidance which would produce renewable energy production to more sustainable and less carbon-based forms; in the right locations. Support for the proposal is found in 'Achieving the Visions' of the JCS by 2031 which depends upon the successful delivery of several outcomes including an adaptability to future climate change. The Plan will 'create more sustainable places that are naturally resilient to future climate change. Carbon footprints will 12 be minimised, and sustainable transport choice will be improved. Low carbon growth will be delivered through policies that seek the highest viable standards for energy efficiency, renewable energy and sustainable construction'. The JCS highlights that renewable and low carbon energy and green technologies including wind, solar, biomass and other technologies is identified as a 'sectoral strength and opportunity' for North Northamptonshire. In addition, the JCS Settlement roles for the rural areas states that: d) Rural diversification and the appropriate re-use of rural buildings will be supported in accordance with Policy 25. Renewable energy developments will be considered under Policy	

LIR Ref.	Topic Area	Summary	Applicant's Response
		26. Moreover, the Spatial Strategy defines the roles that the Urban Areas (Growth Towns and Market Towns) and Rural Areas (Villages and Countryside) will play in building a more sustainable, self-reliant North Northamptonshire. The roles of settlements in North Northamptonshire are set out in Table 1: Spatial Roles where infrastructure investment and the distribution of new homes, jobs, shops and other types of development will contribute to creating a well-connected network of settlements that together meet most of the needs of residents in North Northamptonshire. Table 1 states that the Open Countryside is to be: 'A living, working countryside providing the green setting for the network of settlements and supporting the area's self-reliance and resilience through food production; leisure and tourism; biodiversity resources; renewable energy; flood risk management and carbon capture.' The application site lies outside of any defined development boundary and in policy terms, within open countryside. Policy 11 (2) (a) of the JCS states that development in rural areas will be limited, part (d) states that Rural diversification and the appropriate re-use of rural buildings will be supported in accordance with Policy 25. Renewable energy developments will be considered under Policy 26. Policy 22 – Delivering Economic Prosperity outlines that a stronger more sustainable economy that will deliver a net increase of 31,100 jobs and will be sought through: a) Ensuring that sufficient high quality sites are identified to support the delivery of the job targets in Table 3 (see Policy 23), recognising opportunities provided by the priority sectors of Renewable and Low Carbon Energy and Green Technologies, High Performance Technologies and Logistics.	

LIR Ref.	Topic Area	Summary	Applicant's Response
		Policy 26 (renewable energy) of the JCS is applicable in considering renewable energy proposals which states 'Proposals for sensitively located renewable and low carbon energy generation will be supported where it can be demonstrated that the proposal meets all of the following criteria: a) The landscape impact of the development is minimised and mitigated against; b) The development links to a specific demand through a decentralised energy network or where this is not possible, the necessary infrastructure is provided to supply power to the National Grid; c) The siting of development avoids harm to the significance of a heritage asset and its setting in accordance with the provisions of the NPPF; d) The siting of development does not significantly adversely affect the amenity of existing, or proposed, residential dwellings and/or businesses, either in isolation or cumulatively, by reason of noise, odour intrusion, dust, traffic generation, visual impact or shadow flicker; e) The development does not result in an adverse impact on the capacity and safety of the highways network and of public rights of way; f) The development includes a managed programme of measures to mitigate against any adverse impacts on the built and natural environment resulting from the construction, operation and decommissioning of any equipment/infrastructure; g) The development does not create a significant adverse cumulative noise or visual impact when considered in conjunction	

LIR Ref.	Topic Area	Summary	Applicant's Response
		with other developments planned within North Northamptonshire and adjoining local authority areas; h) The development retains and enhances on-site biodiversity and supports the enlargement of, and/or connection to, existing biodiversity assets such as wildlife corridors, where possible; i) Proposals for Solar Photovoltaic farms avoid the best and most versatile (BMV) agricultural land. 7.16 7.17 The Development Plan is supportive of the general principle of renewable energy schemes and actively encourages them where the benefits outweigh the harms, subject to the satisfaction of a number of detailed criteria. Therefore, the general principle of the proposed development is in accordance with the adopted Development Plan and it is the detailed assessment of such schemes against the required criteria which is important when establishing whether a proposal is likely to be acceptable or not.	
NNC 7.17 to 7.20	Principle of Development	Any permission would be for a long-term but temporary basis for a period of 60 years. A justification of why the 60 year period should be sought from the Applicant. This report assesses the proposals on a worst-case basis but questions arise as to what basis have the Applicant's selected 60 years for the development. Paragraph 2.10.65 to 2.10.67 of EN-3 is relevant in regard to project lifetime and environmental impacts. "*2.10.65 Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although Applicants may seek consent without a time-period or for differing time-periods of operation.*	Regarding the operational life of the Scheme please refer to the Applicant's response to comment 'SBMP-005' in **The Applicant's Responses to Relevant Representations [REP1-161]**. By seeking a 60-year time-limit this allows flexibility in ensuring that the operational life of the equipment and the delivery of renewable energy can be maximised. It should also be noted that 60 years is the maximum lifetime the Scheme is permitted to operate and if the Proposed Development is

LIR Ref.	Topic Area	Summary	Applicant's Response
		2.10.66 Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed. *2.10.67 Solar panel efficiency deteriorates over time and Applicants may elect to replace panels during the lifetime of the site*". It is considered that that the proposed period of 60 years in combination with the large land area take, needs serious consideration. The operational period is atypically long over a large land area and this must be factored into the detailed assessment criteria, particularly landscape and heritage impacts. NNC consider that 40 years would be a more appropriate timescale in line with the upper limit set out in NPS EN-3. The reduction in lifespan is on the basis of environmental reversibility and the realistic expectation of panel degradation/replacement requirements during the operational period. Although reducing the operational timeframe would not reduce the environments effects significantly, it would be for a semi-permanent period rather than at 60-years, a lifetime. In detail, a 40 year period is more likely to see less, perhaps even just one major technology upgrade and fewer replacements of the infrastructure would be required which would be less disruptive for the local community, habitats and highway network. A longer lifespan of 60 years means a prolonged land occupation of the infrastructure impacting biodiversity and land use planning. There is the risk that over 60 years there is greater exposure for changes in energy policy, tariffs and environmental regulations	considered to be unviable earlier within that period, decommissioning may be brought forward. The Environmental Impact Assessment has considered environmental impacts across the lifetime of the Scheme, including the operational phase for the Scheme which anticipated to be up to 60 years. The EIA also includes an assessment of potential impacts associated with the replacement of infrastructure. Based on current technological expectations, it is anticipated that large-scale solar panel replacement may occur once over the lifetime of the Scheme, while the Battery Energy Storage System (BESS) may require replacement up to five times during the operational period. The decommissioning of the Scheme has been assessed as 2089. In respect of decommissioning, Requirement 21 of Schedule 2 to the **Draft DCO Revision A [REP1-008]** requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. Please refer to the **ODS Revision A [REP1-135]** which provides details and control measures of decommissioning activities.

LIR Ref.	Topic Area	Summary	Applicant's Response
		compared to a 40 year span. To note, 60 years extends over three generations which amplifies the degree of transformation. Over that period of time there are likely to be paradigm shifts such as industrial or digital revolutions resulting in more cultural and technological divergence. The infrastructure built at the beginning of the period may become outdated by the end. Given such a long period, at this stage the Applicant has made assumptions about technology, resources and societal priorities over the operational period. Reducing the operational time period to 40 years would reduce these impacts and risk. Given that over a 60 year span, entire industries may emerge and then vanish it is particularly important that Requirements should be imposed to require the site's restoration following cessation of its use, should the site become redundant not only at the end of the operational period but at any point during the operational period.	The Applicant confirms that they are responsible for the decommissioning of the Scheme and removal of all waste materials arising from the Scheme, as part of the Applicant's obligations to restore the land to its current use once the Scheme has been decommissioned. As outlined in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 [REF1-162]** the following Development Consent Orders have been granted consent for solar projects for a 60 year period into the Examination (Gate Burton, West Burton, Cottam, Mallard Pass, Tillbridge).
NNC 7.21	Principle of Development	With regard to the impact of the cable route within NNC administrative area, Policy 26 and Policy 10 of the JCS, sets out that development must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from the development. Furthermore, the proposal needs adequate mitigation, safe routing and ensuring grid capacity. The impact is considered to be neutral owing to the temporary disturbance whilst the cable route is excavated, the cable installed and back filled. Archaeological impact is relevant but is considered later in this report.	The Applicant has considered the relevant policies including policy 10, in the **Policy Compliance Document Revision A [EX2/GH7.23_A].** The **OCEMP Revision A [REP1-131]** encourages the use of lower carbon modes of transport by identifying and communicating local bus connections and pedestrian and cycle access routes to/ from the Scheme to all construction staff, and providing appropriate facilities for the safe storage of cycles. A Travel Plan is also proposed to reduce volume of staff and employee trips to the sites. The final measures and details will be confirmed in the CEMP.

LIR Ref.	Topic Area	Summary	Applicant's Response
			The Environmental Statement has given consideration to all aspects of the Scheme including consideration towards impacts associated with the cable route corridor. A series of management plans have been prepared, which will be secured through the Requirements set out in Schedule 2 of the **Draft DCO Revision A [REP1-008]**. The **OCEMP [REP1-131]** secured through Requirement 13 in Schedule 2 to the **Draft DCO Revision A [REP1-008]** outlines the construction programme, identifies potential environmental effects, proposed design and mitigation measures to reduce adverse impacts, describes monitoring and reporting strategies for mitigation effectiveness. The **OCTMP [REP1-145]** providing a framework for the management of vehicle movements to and from the Site during the construction phase, to reduce, as far as practicable, impacts of the Scheme on the local highway network.
NNC 7.22 to 7.27	Principle of Development	<u>The Scale of the Proposal</u> The cumulative land area for the Scheme is approximately 1,200 hectares (of this approximately 550 hectares would be for solar arrays and associated infrastructure) and the proposed operational period for the Scheme is 60 years. This demonstrates that this is a very large scheme both spatially and temporally and	Please refer to the Applicant's response to 'NNC 004' in **The Applicant's Responses to Relevant Representations [REP1-161]** which outlines the approach to the extent of land, scheme design and the assessment of cumulative landscape and visual effects, as detailed in **ES Chapter 8: Landscape and Visual Impact [APP-045]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
		this does bear on the scale of the impacts. It must be noted that the scheme effects will run to 2091. The cumulative land area impacts are significant. Such impacts include the land use change. The loss of arable/grassland farmland that is proposed to host panels, BESS cabling, inverters, fencing, access tracks etc resulting in a loss of agricultural land (of which approx. 66.6% is of BMV (Best and Most Versatile)) to an industrial-scale renewable infrastructure. The infrastructure impacts are wide as cumulatively the cabling, access roads, construction traffic, fencing, lighting etc create additional spatial footprints beyond just the panels. The cumulative landscape and visual impact as the area is large and extends across multiple fields, villages, rights of way, the 'zone of theoretical visibility' is wide. Some local communities will be surrounded on multiple sides. As mentioned the site spans multiple local authority areas, villages and varied landscapes, therefore the spatial footprint means the potential for overlapping impacts is high as there are many receptors affected across a wide region. Furthermore, the cable corridor and BESS bring additional spatial spread (noted that some is underground but access, construction/decommissioning zones etc amplifies scale). Temporally, the construction phase is up to 2 years, operational phase is 60 years and then the decommissioning phase is up to 2 years. The large spatial footprint means that many more receptors will be affected and because the area spans multiple fields, villages, a large region, the number of stakeholders is large. The long operational lifetime (60 years) means that these impacts are not	Further detail is provided in the response to EMPM-005 in **The Applicant's Responses to Relevant Representations [REP1-161]**, which explains how the introduction of solar arrays and associated infrastructure is not expected to become a defining feature of the landscape during operation (e.g., at Year 1 and Year 15). This conclusion is based on six key factors: the dispersed layout of the Sites; the reversible and 'overlaid' nature of the Scheme; the effectiveness of mitigation planting, particularly by Year 15; the delivery of Biodiversity Net Gain; and the creation of a strengthened legacy landscape. The long-term legacy of the Scheme is anticipated to be a robust and enhanced landscape framework, shaped by mitigation and planting measures that contribute to biodiversity enhancement and ecosystem resilience. The Applicant's response to 'SBMP-002' **The Applicant's Responses to Relevant Representations [REP1-161]** addresses the consideration of Best and Most Versatile (BMV) land across the Scheme, while response to 'NE-014' in the same document outlines the potential environmental benefits of removing certain fields from intensive arable use. Finally, **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** assesses the combined effects of multiple work packages

LIR Ref.	Topic Area	Summary	Applicant's Response
		short-lived, the change is enduring; changing how the landscape looks, how the land is used and how ecological networks operate. As mentioned, the additional infrastructure adds to the spatial footprint so the impact is more than just panels on fields. The temporal sequence means high intensity during the early years (construction), then a long duration of altered state (operation) plus then uncertainties about end-state after decommissioning which increases the risk of potential 'legacy' impacts. Cumulatively the magnitude of impact is therefore large; many hectares, many receptors affected, the long duration and wide variety of effect types (visual, ecological, agricultural, community etc). To conclude, the cumulative spatial and temporal characteristics of the Scheme result in high-scale impacts. The large area, the long duration and the varied receptors all combine to heighten the scale of effects. The scrutiny of the mitigation proposed, habitat enhancement, restoration, community engagement and decommissioning planning needs to therefore be high. It is considered that the scale of the proposal would have a negative impact.	and Sites, providing a holistic view of cumulative impacts.
NNC 8.1 to 8.2	Planning Policy	Landscape and Visual The Overarching National Policy Statement for Energy (EN-1) recognises that all nationally significant energy infrastructure is likely to have some adverse effects on landscape and visual amenity. It requires decision-makers to consider the nature, scale and duration of such impacts, including cumulative effects arising from multiple schemes. EN-1 highlights that effects on nationally designated landscapes such as National Parks and Areas of Outstanding Natural Beauty should be given great weight but	The Applicant notes this comment. The planning policy position is set out in the **Planning Statement Revision A [EX2/GH7.15_A]** and the **Policy Compliance Document Revision A [EX2/GH7.23_A].**

LIR Ref.	Topic Area	Summary	Applicant's Response
		also acknowledges that significant impacts may arise in non-designated but locally valued landscapes. It emphasises the importance of considering perceptual qualities and the experience of visual receptors, including users of public rights of way and recreational routes, and makes clear that visual assessment should be carried out in accordance with established good practice. The Renewable Energy Infrastructure NPS (EN-3) provides more specific guidance for solar photovoltaic development. It states that solar farms are often large in scale and can be highly visible, giving rise to significant landscape and visual effects. The NPS advises that careful siting, layout and design are essential to reduce impacts, with mitigation measures such as retention and reinforcement of existing landscape features, provision of structural planting, and sensitive boundary treatment particularly important. EN-3 also notes the importance of assessing glint and glare where relevant, and of giving full consideration to cumulative and sequential effects, as multiple solar farms in close proximity may fundamentally alter perceptions of countryside character. While mitigation planting can reduce effects over time, EN-3 makes clear that major adverse effects may still occur during construction and in the early operational years, requiring careful management and phasing.	
NNC 8.7 to 8.13	Landscape and Visual	<u>Baseline Landscape Character</u> The landscape of North Northamptonshire is characterised by a varied topography of undulating landform, clay vales, and locally elevated ridges. The Green Hill Solar Farm site parcels are	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		dispersed across approximately 500 hectares of open countryside, much of it in arable agricultural use, with intact hedgerow boundaries and scattered mature trees contributing to local character. The area falls within the framework of the Northamptonshire Landscape Character Assessment (2010), which provides the county-wide evidence base for understanding local landscape character and sensitivity. The site and its surroundings are covered by several relevant Landscape Character Types (LCTs), including 12 Limestone Valley Slopes; LCT Profile: 6 Undulating Claylands and LCT Profile: 8 Low Wooded Clay Ridge and their associated Landscape Character Areas. These LCTs share a predominantly rural, large-scale agricultural character, where gently rolling landform, rectilinear field patterns and open views across farmland define the landscape experience. The area surrounding the proposed development retains a strong rural identity, with a relatively sparse settlement pattern of small villages such as Wollaston, Easton Maudit, Grendon, Great Doddington and Mears Ashby. These communities are typically compact in form, often occupying slightly elevated land and defined by historic cores, with farmland extending directly from settlement edges into open countryside. The wider rural landscape has an open, agricultural character defined by large arable fields, rectilinear patterns of hedgerows, and intermittent wooded copses. Long-ranging views across gently rolling land create a sense of openness and exposure, with undeveloped skylines contributing strongly to landscape distinctiveness and visual amenity.	

LIR Ref.	Topic Area	Summary	Applicant's Response
		Agricultural land use dominates, with intensively managed arable cropping being the primary land use. This contributes to a simple but large-scale landscape pattern, in which hedgerows, ditches and isolated trees form the main structural elements of enclosure and ecological connectivity. The area is traversed by a dense network of rural lanes and Public Rights of Way (PRoW), including footpaths, bridleways and byways, which provide both functional connectivity and recreational access. These routes often follow historic alignments and afford open views across farmland and towards neighbouring settlements. They are an important component of local character, providing opportunities for walking, cycling and riding within a predominantly tranquil rural setting. Collectively, these elements contribute to a landscape of moderate to high sensitivity to large-scale development, where perceptual qualities of openness, rural tranquillity and settlement separation play a key role in local distinctiveness and sense of place.	
NNC 8.14 to 8.20	Landscape and Visual	<u>Visual Environment</u> The dispersed parcels of the proposed Green Hill Solar Farm are located within open countryside, interspersed between several villages in North Northamptonshire. The surrounding settlement pattern is relatively sparse, but proximity to multiple communities means that residential receptors are an important consideration. Easton Maudit is a small rural village located centrally in relation to Site F. It is characterised by its historic church and compact form, surrounded by arable fields. Open views extend north and west from the village along Easton Lane, where rising landform	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		and sparse hedgerow cover create broad vistas across the countryside. These views are highly sensitive to change. Grendon is close to Sites BESS and F. Approaches into the village are defined by open slopes with long views towards its church and clustered settlement form. Several parcels of the proposed development lie on elevated or sloping ground close to the village, making the landscape setting of Grendon particularly susceptible to visual change. Mears Ashby lies to the west of Site E. The village is elevated, with properties on its southern edge affording panoramic views across open farmland towards the development parcels. The settlement has a strong relationship with its surrounding countryside, with the open setting contributing to its character and visual amenity. The site area is traversed by a dense PRoW network. Walkers and riders along these paths currently experience open and undeveloped views across farmland, with skylines often unbroken by built development. These receptors are particularly sensitive given the recreational function and rural quality of the routes. Road users also represent an important receptor group. The rural lanes linking Wollaston, Easton Maudit, Grendon and Mears Ashby are narrow and lightly trafficked, with a distinctly rural character and open views across farmland. Easton Lane in particular provides an experience of open countryside and rising landform that contributes strongly to the setting of Easton Maudit and Grendon.	

LIR Ref.	Topic Area	Summary	Applicant's Response
		In combination, settlement edges, PRoWs, and rural roads provide a high degree of visibility across the site areas. The open nature of the landscape, elevated landform in parts, and limited screening vegetation mean that visual sensitivity across the study area is high, particularly for residents, walkers, riders, and those travelling through the countryside on rural lanes.	
NNC 8.22 to 8.23	Landscape and Visual	The assessment approach, including the identification of representative receptors, the methodology for evaluating sensitivity and magnitude of change, and the scope and form of mitigation, was developed and refined through ongoing pre-submission consultation between NNC and the Applicant's landscape and EIA teams.	The Applicant notes this comment.
NNC 8.24 to 8.25	Landscape and Visual	Given the dispersed nature of the Scheme, it was agreed that landscape receptors would be based on study areas, drawing on character assessments at national, regional and local scales. To ensure a clear and proportionate approach, the key characteristics and qualities of relevant landscape areas were reviewed and consolidated for each site area and for the Scheme as a whole. This has provided a framework for assessing effects across the dispersed site parcels while maintaining appropriate reference to established character typologies and local distinctiveness. While this approach has ensured consistency across the scheme, it is important that the assessment reflects local variation and the differing levels of sensitivity within and between the identified landscape areas, particularly where enclosure, tranquillity, or settlement setting are key defining characteristics.	**ES Chapter 8: Landscape and Visual Impact [APP-045]** has undertaken a robust assessment of the sensitivity (nature of the receptor) of landscape and visual receptors. The judgement on landscape sensitivity is based on consideration of both the landscape receptor's value and its susceptibility to change arising from the Scheme. Details on how landscape value and susceptibility have been assessed are set out within the **ES Appendix 8.1: LVIA Methodology [APP-078]**. **ES Appendix 8.3 (Revision A) [REP1-041]** sets out an assessment of the Value, Susceptibility and Sensitivity for Landscape Character for each of the individual Sites within the Scheme within each of the 3 Study Areas. This approach has allowed for the individual characteristics and local variation

LIR Ref.	Topic Area	Summary	Applicant's Response
			that are present within the landscape in and around each of the individual Sites to be fully accounted for within the assessment of Landscape Sensitivity.
NNC 8.34 to 8.35	Landscape and Visual	Operation Phase Residual Impacts with Mitigation For visual receptors, the ES concludes that mitigation planting will progressively filter and soften views of the arrays, reducing many effects by Year 15 to minor adverse. While the majority of the ES viewpoint assessments are broadly agreed, there are some locations where professional judgement suggests that effects may be understated. At VP16 (Wilby Road, Parcel E), the ES records a reduction from Major/Moderate Adverse at Year 1 to Minor Adverse at Year 15. Given the visual exposure and its limited containment, residual effects are more likely to remain Moderate/Minor Adverse at Year 15, reflecting the continuing prominence of solar infrastructure. • At VP31 (NN/TA/004), the ES judges a reduction from Major/Moderate Adverse at Year 1 to Moderate/Minor at Year 15; however, residual effects could remain Moderate Adverse, as the new tree belt would alter wider landscape views but would not remove the localised perception of solar development. • At VP32 (A509 London Road/NN/TA/18) the ES records Moderate/Minor Adverse effects at Year 1, though given the degree of visibility along this route, impacts at Year 1 are	VP16 – Wilby Road VP16 is located at the bend on Wilby Road (TR155) where it turns south west to directly approach the settlement. No panels are proposed in fields directly alongside this VP location, with field EF9 to the north being proposed for set aside for ground nesting bird mitigation. The field directly to the south is not included within the Scheme. The nearest panels to VP16 are located within field EF13 and are located approximately 214m away. Panels within EF10 are located approximately 280m from VP16. Along the western edge of EF10 mitigation planting includes for an approximate 280m length and approximately17m width proposed river corridor planting for instant screening. This continues south alongside the western edge of EF13 to reinforce the existing trees and scrubby vegetation along this field boundary. Alongside Wilby Road, the array has been significantly set back (approximately 65m to the north, and approximately 60m to the south) to maintain openness on the approach to the settlement. Fields EF9 and EF16 have not been

LIR Ref.	Topic Area	Summary	Applicant's Response
		more appropriately judged as Moderate Adverse, reducing thereafter with planting establishment and growth. • At NN10 and NN13 (Easton Lane) the ES records effects reducing from Major/Moderate Adverse at Year 1 to Minor/Moderate by Year 15, whereas professional judgement indicates that residual effects are more likely to remain Moderate Adverse, due to the openness of the route, rising landform, and the sequential presence of multiple parcels. These differences highlight that, while the ES anticipates significant mitigation benefits by Year 15, in practice some key receptors, particularly those at elevated or open locations and along sensitive routes such as Easton Lane, are likely to continue to experience Moderate Adverse residual impacts in the long term. Nonetheless, it is recognised that although we consider certain impacts to remain higher than those reported, they would not be regarded as significant once mitigation has matured and vegetation has successfully established.	proposed for panels helping to fragment the array and provide setback from the settlement. Avoidance within EF9 will help maintain the rural hinterland surrounding Mears Ashby. Mitigation proposals along Wilby Road include for the existing roadside hedgerows to be grown out to up to 4.5m and reinforced with densely spaced native tree planting. Once established the proposed roadside mitigation will increase level of vegetation and screen views of the array. Once the hedgerow planting has established this would create an attractive 'green lane' on the approach into Mears Ashby. Given the above, it is considered that the findings of the LVIA are robust with effects reducing to Minor Adverse by Year 15 and it is noted that despite differences in professional opinion regarding the specific level of effect, the LIR aligns with the LVIA in recognising that the proposed planting alongside Wilby Road is suitable in mitigating Significant Adverse Effects to this receptor. <u>VP31 - PRoW NN|TA|4#1 (TP181)</u> The LIR is incorrect in its referencing of identified effects within the LVIA for PRoW NN|TA|4#1 (TP181), on which VP31 is located to the north of fields FF4. The LVIA identified Moderate Adverse

LIR Ref.	Topic Area	Summary	Applicant's Response
			(Significant) Effects at Construction, Year 1 and Year 15 for users of this PRoW. VP32 - A509 London Road/NN/TA/18 Alongside VP32 the array has been set back from the A509 London Road (TR014) by approximately 35m helping reduce appreciation of views of infrastructure within fields FF1 and FF2. Mitigation planting alongside the A509 on the eastern edge of fields FF1 and FF2 includes for proposed secondary native species rich hedgerow with densely spaced native hedgerow trees as well as a small section of native woodland copse / shelterbelt planting to reinforce the existing trees at this location. The A509 is a fast moving highway with road users traveling perpendicular to the Scheme typically allowing only for fast moving, transient, oblique views of the proposals. Users of PRoW NN/TA/18 (TP176) would only experience views of the proposals from the western extent of the PRoW where it approaches and joins the A509. Given the above, it is considered that the findings of the LVIA are robust and it is noted that the LIR aligns with the LVIA in recognising the effectiveness of the mitigation planting in this location at reducing effects. NN10 & NN13 - Easton Lane (TR080)

LIR Ref.	Topic Area	Summary	Applicant's Response
			Easton Lane (TR080) is a semi enclosed lane leading east from Easton Maudit towards London Road at Bozeat. In views from VPNN10 on Easton Lane, panels within field FF19 are located approximately 341m north of Easton Lane with existing fields and their field boundary vegetation helping provide separation. Mitigation proposals along the southern boundary of FF19 is for the existing hedgerow to be reinforced with densely spaced native tree planting and for additional dense linear tree planting between the existing hedgerow and the array, which once established would screen views of the array. The fields immediately alongside this section of Easton Lane are outside of the Scheme, resulting in the openness alongside the road being maintained. Alongside VPNN13 mitigation proposals include a belt of native woodland copse/shelter belt (scrub and tree planting) along the southern side of Easton Lane as well as the existing roadside hedgerow to be reinforced with densely spaced native tree planting. These proposals, whilst extensive, would have a limited effect initially with views of the substation and array persisting. By Year 15 mitigation planting would have established enclosing FF25 and screening views of the substation and surrounding array, with glimpses into FF26 possible through the farm gate and access.

LIR Ref.	Topic Area	Summary	Applicant's Response
			Once established the mitigation planting would provide screening of the array, and as such, it is considered that the findings of the LVIA are robust.
NNC 8.36	Landscape and Visual	For landscape receptors, the ES concludes that residual effects on the site fabric will be Neutral at Year 1, becoming Moderate Beneficial by Year 15 across all site parcels. This reflects the introduction of new woodland blocks, reinforced hedgerows, and species-rich grassland. While these measures would introduce positive elements that contribute to biodiversity and local landscape structure, they must also be considered alongside the physical changes associated with the development itself. The introduction of access tracks, fencing, substations and other infrastructure will result in the permanent alteration of land use and surface character, although the underlying field pattern will only be modified in limited areas where new hedgerows, riparian corridors or woodland planting are proposed beyond the existing arrangement. The change from an open and productive agricultural landscape to one influenced by renewable energy infrastructure represents a material shift in how the landscape is used. Although the proposed planting will, over time, help to soften and partially offset these effects, the overall change in land use will remain a defining and long-term characteristic of the sites.	The Applicant notes this comment. **ES Chapter 8: Landscape and Visual Impact [APP-045]** acknowledges a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure. Adverse effects remain through to the decommissioning phase, although reduced and no longer Significant as a result of the mitigation planting. At Decommissioning, all infrastructure above ground is to be removed and the Sites returned to their existing condition. As such the LIR is incorrect in its assertion that "access tracks, fencing, substations and other infrastructure will result in the permanent alteration of land use and surface character".
NNC 8.37	Landscape and Visual	In relation to landscape character within the 1 km study area, which draws upon published landscape character assessments and their associated characteristics and qualities, the ES identifies Moderate Adverse effects at Year 1, reducing to Moderate–Minor Adverse by Year 15. This acknowledges that the introduction of solar panels, internal tracks and associated	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		infrastructure would represent a dominant and defining new feature within the local landscape. While embedded mitigation will make a positive contribution through increased vegetation cover and green infrastructure, these benefits would not outweigh the influence of the solar arrays at this scale, particularly in the early years of operation when planting is establishing.	
NNC 8.38 to 8.39	Landscape and Visual	A blanket weighting has been applied across all development parcels within the ES; however, it is considered that localised variation in sensitivity and scale of change should be recognised. In particular, Site E, which comprises a large, consolidated expanse of solar arrays located in close proximity to Mears Ashby, is likely to experience more pronounced effects on landscape character. Although this area contains relatively few PRoWs, the concentration of infrastructure within an open and compact landscape would heighten perceptibility and local dominance. For this reason, effects at Year 1 could more appropriately be judged as Moderate–Major Adverse, reducing to Moderate Adverse by Year 15 as planting matures and throughout to Year 60. At the wider 2 km study area, the ES records effects as Moderate–Minor Adverse at Year 1, reducing to Minor Adverse by Year 15. This is considered a reasonable conclusion. Beyond the immediate vicinity of the development parcels, the influence of the Scheme will diminish with distance and intervening vegetation, and as new planting becomes established, the Scheme will be perceived increasingly as part of the evolving agricultural landscape pattern.	The LIR is incorrect in its assertion that a blanket weighting has been applied across all of the individual sites (development parcels). **ES Chapter 8: Landscape and Visual Impact [APP-045]** has undertaken a Site by Site and by Study Area assessment of Sensitivity and Magnitude of Change, which combined give the Significance of Effects for each of the individual Sites. This approach has allowed for the individual characteristics and local variation that are present within the landscape in and around each of the individual Sites to be fully accounted for within the assessment. The LVIA acknowledges that locally prior to the establishment of the Embedded Mitigation, there would be an immediate change to the character of the individual Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, these effects would be limited to the site itself and its immediate setting. As planting matures it would begin to provide enclosure to the individual Sites, screening and providing containment to the Scheme allowing it to become

LIR Ref.	Topic Area	Summary	Applicant's Response
			more absorbed into the receiving landscape. However, given the scale of the proposals, there would be an appreciation of the Scheme within its immediate surroundings which would be notably different from the character of the surrounding arable countryside. With regard to Site E, the LVIA recognises these changes, however due to the position of the Site on the plateau landform, combined with the existing containment provided by existing on site vegetation and across the immediate landscape, beyond the immediate context, effects on the character of the local area would be very limited and not wide ranging. As such, the Site is able to accommodate the proposed change without undue adverse effects. The local study area would be able to accommodate change brought about through the development without undue adverse effects. Planting across the Site would lead to an increased level of vegetation cover locally, the linking and enhancement of existing natural features, creating a stronger, more resilient framework across the local area. Given the above, it is considered that the findings of the LVIA are robust.
NNC 8.40 to 8.41	Landscape and Visual	From a landscape perspective, the mitigation proposed would assist in reinforcing and enhancing the local landscape structure through new hedgerows, woodland edges and grassland habitats. However, as clarified in the Landscape Institute	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		Technical Guidance Note LITGN-2024-01 *Notes and Clarifications on Aspects of GLVIA3* (August 2024), care should be taken to ensure that landscape and visual mitigation are not conflated. Screening the development from view may reduce its visual effects but does not necessarily lessen its landscape effects, such as those on landscape character. In addition, it is important that the terms mitigation and enhancement are used correctly. Mitigation should focus on measures that prevent, reduce or where possible offset significant adverse effects, whereas enhancement seeks to improve landscape or visual amenity beyond the baseline condition. In this context, while the proposed planting and habitat creation would deliver some enhancement relative to existing conditions, they primarily function as mitigation intended to reduce the degree of adverse change arising from the development. It is also acknowledged that the perceptual qualities and sense of place associated with the open, tranquil and rural character of the landscape will remain altered for the duration of the operational period. Although the vegetation framework will integrate the development more successfully over time, the underlying change from a traditional agricultural rural landscape to one more defined by infrastructure will continue to influence how the area is perceived and experienced.	
NNC 8.42	Landscape and Visual	The longevity of the Scheme, anticipated to operate for up to 60 years, introduces an extended temporal period that goes beyond the timeframe typically associated with temporary development. While decommissioning and land restoration are proposed post 2091, the duration of the operational period represents a substantial proportion of a lifetime and at least one full generation. As such, the resulting change in landscape character	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		and experience will be long term and effectively permanent for those living within and around the affected area. The ES assessment appropriately identifies Year 15 as the point at which mitigation is expected to reach maturity, providing a benchmark for long term residual effects. However, it is important to recognise that the period between Year 15 and decommissioning constitutes the majority of the Scheme's lifespan, during which the identified adverse effects, though reduced by mitigation, will continue.	
NNC 8.43	Landscape and Visual	It is also worth noting that the proposed establishment of new hedgerows along site boundaries, with a target height of approximately 4 to 4.5 metres, is intended to provide visual screening of the solar infrastructure and to assist in integrating the development within the surrounding landscape. While this approach would help to reduce the visual prominence of the arrays in near and mid-distance views, it would also increase the degree of enclosure and could lead to a noticeable change in local landscape character. In areas that are currently open or semi open, the introduction of taller, continuous hedgerows may diminish existing visual connections across the countryside and erode the perception of rural openness.	Effects associated with the changes to landscape management across the Scheme are included within the consideration of effects within **ES Chapter 8 Landscape and Visual Impact [APP-045]**. The LVIA acknowledges a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure, as well as effects associated with changes to landscape management including changes to hedgerow heights. Following decommissioning of the Scheme control of the hedgerow management would no longer be enforced through the **OLEMP Revision A [REP1-137]** allowing landowners to manage the heights as under current practice. As such whilst the LVIA acknowledges the change in character to the landscape as a consequence of the change in hedgerow heights, this change would not be

LIR Ref.	Topic Area	Summary	Applicant's Response
			permanent and limited to the lifetime of the Scheme.
NNC 8.45	Landscape and Visual	<u>Cumulative Impacts</u> ES Chapter 8 (paragraph 8.9.3) (APP-045) states that "In reaching the overall assessment of effects associated with the Scheme, the cumulative effects of each of the Sites and Cable Route Corridor are assessed and combined to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme." While this approach is technically correct in methodological terms, there is a reasonable argument that the magnitude of change on the landscape, when considered across the full geographical extent of the Scheme rather than at the level of individual parcels, would be greater given the scale and area involved. Consequently, it follows that the overall significance of effect, particularly in relation to landscape character, would also be greater if the Scheme is viewed and experienced as a single, cohesive development. In this context, it is noted that ES Appendix 8.1 (Table 8.1.1.14, APP-078) identifies moderate effects on landscape character as being significant; therefore, the cumulative site effects arising from the combined solar parcels are likely to represent a significant adverse effect on the 1km Study Area (landscape character).	Although the Scheme comprises a series of independent areas of land or Sites, they are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road infrastructure aiding integration and dispersion across the landscape than if the site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.

LIR Ref.	Topic Area	Summary	Applicant's Response
			Due to the dispersed nature of the Sites within the Scheme, an assessment of the landscape and visual effects of Green Hill A-G and the Green Hill BESS, taken together, has been undertaken to determine the effects of the Scheme as a whole. The cumulative effects of each of the Sites are assessed and combined to achieve a set of effects of the Scheme to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme. **ES Chapter 8: Landscape and Visual Impact [APP-045]** has identified that development of the Scheme would result in Significant Adverse Effects to Landscape Character within the 1km Study Area.
NNC 8.46 to 8.48	Landscape and Visual	For landscape character, the ES concludes that cumulative impacts on the landscape fabric, as well as within the 1 km, 2 km and 5 km study areas, would be broadly equivalent to those identified for each site individually. However, this position is not fully supported. From a professional standpoint, while individual site effects may appear limited in isolation, the collective presence of multiple development parcels across this part of North Northamptonshire will inevitably alter the overall perception, rurality and character of the landscape. The cumulative influence of dispersed but related infrastructure would result in a tangible shift from a predominantly agricultural and rural landscape to one where infrastructure becomes a recurring and defining component.	**ES Chapter 8: Landscape and Visual Impact [APP-045]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons are set out below:

LIR Ref.	Topic Area	Summary	Applicant's Response
		Over time, this shift is also likely to influence how landscape character is defined, described and valued, both locally and at district level. It would be reasonable to expect that future landscape character assessments would need to reflect this change, recognising solar development as a defining element influencing the area. With embedded mitigation measures in place and assuming successful establishment, the ES reports that residual cumulative effects will reduce over time. While it is accepted that the contrast and visibility of infrastructure will reduce as new planting matures, the cumulative presence of several large parcels will continue to exert a moderate residual influence on both landscape character and visual amenity in the long term. The hedgerows and tree belts will help to reconnect landscape structure and soften views; however, the underlying transformation of the area's character will remain perceptible.	1. Dispersed nature of the Sites: The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. 2. Nature of Scheme being 'overlaid' and reversable: For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' on the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. 3. Strong framework of existing vegetation: The strong framework of existing vegetation means that this would provide the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong

LIR Ref.	Topic Area	Summary	Applicant's Response
			network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. 4. The benefits of mitigation: Year 15 would bring forward the benefits of the new planting in reducing the adverse effects. Please refer to the LVIA specifically Table 8.10 which sets out the Planting Typologies utilised within the Landscape and Ecology Mitigation Plans and Table 8.11 of the LVIA which sets out the quantity of landscape enhancements the Scheme would provide: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.14km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and • 1,079.53ha of groundcover. 5. Biodiversity Net Gain: In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver additional enhancement and connections to wider ecological

LIR Ref.	Topic Area	Summary	Applicant's Response
			networks as well as contributing to the enhancement of the quality of the landscape going well beyond biodiversity net gain. 6. Legacy Landscape: Legacy Landscape is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, agricultural fields would be returned back to agriculture. The landowners would choose how the land is to be used and managed, and it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape

LIR Ref.	Topic Area	Summary	Applicant's Response
			would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
NNC 8.49	Landscape and Visual	For visual receptors, cumulative effects are anticipated to be notable. Road users and PRoW users moving between settlements will experience sequential views of solar infrastructure, particularly where routes follow open or elevated ground. That said, the proposals also include the introduction of new permissive footpaths and access routes, which would provide additional recreational opportunities and enhance connectivity across a wider area. While these routes would introduce more people to parts of the landscape affected by development, they would also represent a positive legacy outcome in terms of accessibility.	The Applicant notes this comment.
NNC 8.50 to 8.51	Landscape and Visual	Proposed Mitigation The ES sets out that decommissioning will be subject to a Decommissioning and Restoration Plan, to be agreed with the	The Applicant notes this comment. Requirement 21 of Schedule 2 to the **Draft DCO Revision A [REP1-008]** requires the Scheme to be decommissioned in accordance with a

LIR Ref.	Topic Area	Summary	Applicant's Response
		local planning authority at the relevant time. This will include measures to minimise disruption, such as: • Retention of established vegetation and boundary features; • Careful removal of infrastructure to avoid unnecessary soil disturbance; • Temporary management of traffic, lighting and working hours to reduce perceptual disturbance; • Progressive reinstatement of land to agriculture and restoration of field boundaries. A Requirement should be imposed to secure this.	decommissioning plan, substantially in accordance with the **ODS Revision A [REP1-135],** to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan, which must also include a timetable for its implementation.
NNC 8.56 to 8.57	Landscape and Visual	That said, the post-decommissioning phase will still rely on the continuation of appropriate management and maintenance to ensure that these benefits are sustained. Without a clear management framework in place, there is potential for the landscape to degrade or become unmanaged, leading to loss of structure, encroachment by scrub, and a gradual decline in landscape quality. It will therefore be important that a Decommissioning and Aftercare Plan is secured to guide restoration, management and monitoring of the landscape once infrastructure has been removed. However, it is also recognised that decommissioning is expected to occur after approximately 60 years, and that over such a long timeframe, a wide range of policy, land management practices, and climatic conditions are likely to change. While an Aftercare Plan would provide an appropriate framework in principle, its detailed content and delivery mechanisms will inevitably need to be reviewed and updated closer to the time of decommissioning,	The Applicant notes this comment. Requirement 21 of Schedule 2 to the **Draft DCO Revision A [REP1-008]** requires the Scheme to be decommissioned in accordance with a decommissioning plan, based on the **ODS Revision A [REP1-135],** to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. It does states in the **ODS Revision A [REP1-135],** that the trees should be protected, conserve landscape and biodiversity features. As set out in the **ODS Revision A [REP1-135],** the land within the Sites will be returned to the respective landowners and to its original use after decommissioning and they would be able to choose how the land is used and managed.

LIR Ref.	Topic Area	Summary	Applicant's Response
		to ensure alignment with future environmental standards, agricultural practices, and policy priorities.	
NNC 8.58	Landscape and Visual	The principle of renewable energy generation is supported in line with national policy but recognises that such schemes must be carefully sited and designed to minimise landscape and visual harm. The ES provides a robust assessment consistent with GLVIA3, and the iterative pre-submission engagement on receptors, methodology and mitigation was welcomed.	The Applicant notes this comment.
NNC 8.59	Landscape and Visual	While the assessment methodology has been discussed in detail with the applicant and is generally sound, professional judgement differs regarding the extent of residual impacts. The 24-month construction period will result in sustained temporary disturbance and a noticeable reduction in the rural qualities and tranquillity of the area. During operation, the Scheme will introduce a large-scale, engineered influence across multiple parcels of open countryside. Although the proposed planting and habitat creation will deliver environmental enhancements over baseline conditions, these measures primarily function as mitigation to reduce the degree of adverse change rather than to restore the original landscape character. The perceptual qualities and sense of place associated with the open, tranquil and rural character of the landscape will therefore remain altered for the duration of the operational period. This is particularly evident around Site E near Mears Ashby, where effects within the 1 km Study Area are expected to remain Moderate Adverse in the long term.	The Applicant notes this comment. Please see responses to NNC 8.38 to 8.39. There is a recognition within the LVIA that mitigation itself can be harmful. There is a trade - off between visual mitigation, landscape mitigation and landscape enhancement. Through the iterative design approach, the Applicant has tried to avoid unnecessary enclosure, for example through enclosing existing PRoW with hedgerows immediately alongside the route in favour of consideration of Legacy Landscape. This is the approach of considering what will the landscape look like at the end of the life of the Scheme once it has been decommissioned. The Applicant's expectation is that the landscape mitigation in the form of the hedgerows and new woodland would remain, which would leave the

LIR Ref.	Topic Area	Summary	Applicant's Response
			landscape in a state of betterment than what it is today. Regarding target hedgerow heights, whilst the mitigation is providing visual screening and enclosure for the Scheme, at the point of decommissioning the land will be returned to its current day management. The Applicant has worked with the Landscape Character Assessments that have been published by the local authority as well as onsite evaluation and description to try to work with the current landscape fabric and framework to provide a structure and species mix that works with the existing pattern of the landscape and enhances it. The Applicant's expectation is that whilst it is providing some enclosure, predominantly on the edges of the Sites and on the fields where existing enclosure is being allowed to grow, providing screening for the wider landscape is not a long - term consideration. The Applicant has tried to balance mitigation for the lifetime of the Scheme whilst looking at opportunities to create a betterment in the legacy landscape. The 24 month construction period is the worst case scenario and the likelihood is that the construction will be phased and Sites will not be constructed at the same time.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.60	Landscape and Visual	In cumulative terms, the combined presence of several dispersed parcels will alter the rural perception of this part of North Northamptonshire, establishing solar infrastructure as a recurring and defining element in the landscape. As set out in ES Appendix 8.1 (Table 8.1.1.14, APP-078), moderate effects on landscape character are defined as significant. On this basis, the cumulative effects of the Scheme are judged to give rise to a significant adverse effect on landscape character across the 1 km Study Area at Year 1, with some Moderate Adverse effects likely to persist at Year 15 despite the establishment and maturation of mitigation planting.	The Applicant notes this comment. Please see responses to NNC 8.45.
NNC 8.62 to 8.63	Landscape and Visual	At decommissioning, the removal of infrastructure will restore openness and deliver long-term beneficial outcomes through mature planting and habitat gains. However, given the 60-year operational lifespan, ongoing management and a review of the Aftercare and Decommissioning Plan will be essential to ensure benefits are realised under future policy and environmental conditions. Overall, NNC consider that many residual and cumulative impacts on landscape and visual receptors are likely to remain Adverse, particularly within and around the main development parcels, but that the extent and duration of these effects will depend on the successful delivery, establishment and long-term management of mitigation proposals. The SoS should therefore ensure that sufficient detail, enforceability and monitoring provisions are in place to secure these measures and to demonstrate that the anticipated reductions in landscape and visual effects can be achieved over time.	The Applicant notes this comment. The successful delivery, establishment and long-term management of mitigation proposals will be achieved through the delivery of a detailed Landscape and Ecological Management Plan for the lifetime of the Scheme, secured by requirement 7 of the **Draft DCO Revision A [REP1-008]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.64	Landscape and Visual	NNC consider that the proposals are in conflict with Local Plan policies 3, 8, 18 and 26 of the JCS.	The Applicant notes this comment. These policies have been considered in the **Policy Compliance Document Revision A [EX2/GH7.23_A].**
NNC 8.75	Local Impacts – Ecology and Biodiversity	The Study Area is set out in the supporting documents, and is clear for the Sites C-F, and the BESS. While the area of search for the Cable Corridor is also clear, the lack of clarity over precise locations at this stage remains and issue and means that Local Impacts cannot be fully considered, only in generalities.	The precise siting of the Cable Corridor remains undetermined, given that the design of the Scheme still requires an element of flexibility (in accordance with **Section 4.3: Rochdale Envelope** of **ES Chapter 4: Scheme Description (Revision A) [REP1-031]**. However, this corridor has been narrowed down in most locations to a 50m swathe for submission, enabling a reasonable degree of confidence in the assessment of impacts at this stage.
NNC 8.76 to 8.80	Local Impacts – Ecology and Biodiversity	The surveys carried out appear to be sufficient to inform the assessment in the relevant Chapter with regard to habitats and protected species (APP-046), and in particular those associated with the SPA. The unmitigated development would result in loss of Functionally Linked Land (FLL) and would have a likely adverse impact on the qualifying reasons for the SPA by removing land used by overwintering birds. Replacement land to compensate for any loss of FLL has been identified, but the success of those as alternatives is at this stage uncertain. Bats may be impacted through the loss of trees and hedgerows. No buildings are to be disturbed. The Applicant has indicated that there is likely to be the loss of trees for the cable route, but the lack of detail on the route at this stage makes it impossible to be definitive on which trees might be impacted and whether these are likely to contain roosts. Gaps in hedgerows are likely to be short and may not harm commuting routes for bats, and are also	The Applicant notes this comment and agrees with the statements therein. Replacement land for loss of Functionally Linked Land has been selected based on various suitability criteria, to give confidence in its capacity to function as mitigation. Where possible, FLL has been retained as such within the Scheme. The mitigation package has been discussed with Natural England and will be agreed through the forthcoming Statement of Common Ground **[EX2/GH8.3.6]**, to be submitted at Deadline 2. Details regarding the establishment, management and monitoring of both retained FLL and proposed FLL mitigation land (as well as all other proposed habitats) are provided in the **OLEMP Revision A [REP1-137].** Sections 4.6, 4.7 and 4.9 cover

LIR Ref.	Topic Area	Summary	Applicant's Response
		likely to be short-lived. If hedgerow gaps are created during hibernation periods for bats, the impacts will be further reduced. Construction lighting is the other potential impact on bats throughout the development area. Impacts on Great Crested Newts are unknown due to the complexity and mobility of the identified risk areas but the applicant has indicated that they will be seeking District Level Licensing for the entire area from NatureSpace, and as such the potential impacts on GCN should be discounted. Otters and Water Voles are vulnerable to construction phase disturbance where the cable route in particular may be required to travel close to or even cross water courses. The precise distribution of each species at the time of construction will have to be assessed, but if present they could experience impacts through noise and disturbance or loss of habitat. The affected water courses are considered to be of local significance and with up to date surveys feeding into mitigation proposals, the impacts are likely to be manageable.	grassland, wetland (wader scrapes) and farmland habitats, which are proposed within the FLL fields. Please refer to the response to NE-001 of **The Applicant's Responses to Deadline 1 Submissions [EX2/GH8.1.15].** The **OEMPS Revision A [REP1-131]** sets out pre-construction and construction phase measures relating to roosting bats, amphibians, and otters and water voles. This includes pre-works inspections to assess the potential for these species to be present, and appropriate avoidance and mitigation measures. This document also discusses construction phase lighting. Relevant Method Statements include Method Statement 2, 4, 5, 6 and 11.
NNC 8.81 to 8.84	Local Impacts – Ecology and Biodiversity	Proposed Mitigation Embedded mitigation has been set out in the relevant Chapter (APP-046) and in an Outline Construction Environment Management Plan (APP-0545). None of the proposed development would result in the loss of any designated sites. Compensatory land to replace the FLL to be lost should be established at least one season prior to loss of original land to the solar array, allowing time for the habitat to develop. Nonetheless, during construction, where compensatory land is close to the development area, there remains the possibility of	Please refer to the Applicant's response to **WNC 4.235** below on this matter.

LIR Ref.	Topic Area	Summary	Applicant's Response
		disturbance to qualifying species. It is recognised though that the impacts will be short-lived and as the FLL sites are part of a network, temporary disturbance is unlikely to have any material impacts on the wintering birds' populations as a whole. Mitigation measures including establishment of buffer zones around badger setts, and along water courses, the development of precautionary working method statements as part of the CEMP, and strategies for dealing with general considerations such as nesting (including ground nesting) birds have been set out. The lack of clarity over the precise cable route remains an issue for a fully detailed mitigation plan, but the approach set out allows flexibility in the final route selection with no anticipated adverse impact on the effectiveness of the mitigation proposals.	
NNC 8.84	Local Impacts – Ecology and Biodiversity	Residual Impacts With the application of these mitigation measures, no significant residual effects on Ecology and Nature Conservation have been identified during construction of the Scheme	As a point of clarity, the **ES Chapter 9: Ecology and Biodiversity (Revision A) [REP1-033]** concludes the following residual effects during the construction phase of the Scheme: • Foraging/commuting bats - Beneficial at the Local level • Amphibians (including great crested newt) - Beneficial at the Local to District level • Skylark/yellow wagtail - Adverse at the District level • Other breeding bird species of open habitats - Adverse at the Site level

LIR Ref.	Topic Area	Summary	Applicant's Response
			• Overwintering birds of open habitats - Adverse at the Site level • Overwintering birds of boundary habitats - Adverse at the Site level
NNC 8.90 to 8.98	Local Impacts – Ecology and Biodiversity	Operational Unmitigated Impacts Operationally, there is a risk of battery fires at the BESS, and given the proximity to the SPA, this has the risk of causing significant harm. Water run-off from tackling any fire could enter nearby watercourses and from here, the SPA itself with consequent impacts on water quality and harms to the ecological integrity of the site. Mitigation measures have been built into the proposals to contain the release of any contaminants, and including for the capture of any water run-off. In normal operation (i.e. without battery fires) there would be impacts from the requirement to replace the batteries every five years. This would be a minimally intrusive operation and unlikely to have any significant impacts. Other ongoing maintenance of the site will be infrequent and low impact, and there is not anticipated to be any significant local impact on ecology from the normal operation of the site. Alongside the operational aspects of running and maintaining the solar sites and BESS, the development will require regular interventions to deliver the BNG proposed. As these interventions will be to ensure that the habitat is improving for use by local wildlife including qualifying species from the SPA, this impact is	As a point of clarity, the BESS and inverters could be replaced up to five times during the operational phase, which equates to once every 10 years. The BESS would not require replacement every 5 years, as the LIR states. This is set out in **ES Chapter 4: Scheme Description Revision A [REP1-031]**. Otherwise, the Applicant notes this comment and agrees with the statements therein.

LIR Ref.	Topic Area	Summary	Applicant's Response
		considered to be significant but a net positive for the operational phase. There should be no operational impacts of the cable route. Once complete, this is considered to be a neutral aspect of the operation. No significant operational impacts are anticipated on statutory and non statutory sites within 10km of, but outside of, the development areas and cable route. The Applicant has identified the operational risk to ponds if sheep used for grazing around the solar panels get access to ponds. They have identified suitable mitigation measures to limit access. The impact of this potential issue is considered to be localised but potentially significant without suitable mitigation. Other wetlands are expected to improve in quality due to landscaping and reduction of arable fertiliser inputs. This has the potential to be a significant impact and a net-positive. Similarly, potential significant local impacts with a net positive outcome during the operational phase as a result of enhancements to habitats and management, are likely to be experiences by badgers, bats, nesting birds and a range of other wildlife.	
NNC 8.99 to 8.102	Local Impacts – Ecology and Biodiversity	Proposed Mitigation Operationally, the proposed development will be low impact and as such few mitigation measures are required. As discussed above, the greatest potential impact is from the possibility of a battery fire. The Applicant has adopted a suite of measures to minimise the risk of a fire, for fire containment, and for effective isolation of any potential contaminants arising from a fire	The Applicant notes this comment and agrees with the statements therein. Regarding the containment of potential contaminants from a fire, the Applicant's response to comment 'EA-009' in **The Applicant's**

LIR Ref.	Topic Area	Summary	Applicant's Response
		(including water runoff from tackling a blaze) from the local water courses and SPA. The effectiveness of these measures are a technical matter beyond the remit of the Council's Ecologist to address and will need to be robustly challenged to ensure that the measure proposed are credible and deliverable. The potential consequences of failure of these measures on the SPA are severe and would be considered to be of international significance. The impact of ongoing maintenance of the site is likely to be low, as infrequent visits are anticipated, and these are likely to be during daylight hours when natural features are less prone to impacts of disturbance. Nonetheless, the Applicant identifies the possibility of needing operational site lighting, and has stated that in the event of this, the lighting design would be sensitive to wildlife, and time limited. This is accepted and is likely to minimise any impacts such that they are considered to be not significant and local. Habitat enhancements resulting from mitigation measures such as providing buffer zones around sensitive water courses and water bodies, and the management required to deliver the agreed BNG, are intended to improve and secure beneficial conditions for wildlife in the area. While the works are likely to have some minor short-lived and local impacts, they are essential to deliver the benefits proposed. The mitigation measures proposed are suitable for delivering the benefits set out.	**Response to Relevant Representations [REP1-161]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.103 to 8.104	Local Impacts – Ecology and Biodiversity	Residual Impacts With the application of these mitigation measures, the Scheme will result in significant moderate beneficial effects to a range of habitats including water course and water bodies, hedgerows and breeding birds, particularly farmland birds associated with hedgerows and field margins, during the operational phase. Subject to the mitigation measures proposed associated with the BESS being considered technically sufficient to protect the SPA from adverse harm, the residual impacts of the mitigation measures are considered to be acceptable.	The Applicant notes this comment and agrees with the statements therein.
NNC 8.105	Local Impacts – Ecology and Biodiversity	Cumulative With the exception of the caution that is required in relation to treatment of the fire risk at the BESS, all other mitigation measures, and the residual impacts, have the potential to be considered as 'net-positives' once the habitat management has achieved the proposed BNG and other enhancements for buffer zones etc have developed. In this context, the cumulative impact of the proposed development is not considered to be negatively impacted.	The Applicant notes this comment and agrees with the statements therein.
NNC 8.106 to 107	Local Impacts – Ecology and Biodiversity	Decommissioning The effects of decommissioning are likely to be similar to those experienced during construction. There is the potential that over the lifetime of the development, an alternative approach is considered more suitable than restoration of all features. In particular this might apply to a decision to not revert grassland to arable, as over that time the conditions for arable on a site may have degraded through nutrient loss, and there may be a net loss of biodiversity by reverting. It is also possible that a decision to	The Applicant notes this comment and agrees with the statements therein.

LIR Ref.	Topic Area	Summary	Applicant's Response
		remove buried cables may not be taken due to the cost and disruption. However, at this stage these are speculative considerations and the paragraphs below are given on the assumption that all features would be fully restored.	
NNC 8.108 to 110	Local Impacts – Ecology and Biodiversity	Unmitigated Impacts The impact of decommissioning will depend to a large extent on the condition of habitats and sensitive receptor sites at the time the works would be carried out and it is not possible to be certain of these details far in the future, from this point in time. The issues set out in the 'Construction Phase' section of this report should be taken as being mirrored here. However, it is likely, even with the uncertainty over the condition of habitats at that time, that the impacts would be lower. Access points would already exist and would not all need to be created for removal of equipment, albeit some widening of gaps may be required. The precise location of protected species during construction cannot be determined at this time. The degree to which the SPA is still in use by qualifying species, or the status of those species cannot be known. Therefore while the potential for impacts is similar to those during construction, the degree and significance of impact cannot be other than speculative.	The Applicant notes this comment and agrees with the statements therein.
NNC 8.111	Local Impacts – Ecology and Biodiversity	Proposed Mitigation The Applicant correctly identifies the potential for aiming to retain certain features post-decommissioning, and sets out that the detail of the proposed works would require a survey by a qualified ecologist to identify all constraints and should take into	The Applicant notes this comment and agrees with the statements therein.

LIR Ref.	Topic Area	Summary	Applicant's Response
		account changes in ecological objectives that have taken place over the operational phase.	
NNC 8.112	Local Impacts – Ecology and Biodiversity	Residual Impacts Given the lack of certainty about the detail of required decommissioning, as set out above, the residual impacts are equally uncertain. However, with the approach to gaining understanding of the issues at the time of decommissioning that the Applicant has set out, the residual impacts are not considered to be significant.	The Applicant notes this comment and agrees with the statements therein.
NNC 8.113	Local Impacts – Ecology and Biodiversity	Cumulative As the Scheme proposed has an operational life of 60 years, it is not possible to state for certain which developments would be constructed or decommissioned at the same time as the Scheme is being decommissioned. However, it is considered likely that the other solar DCOs would be decommissioned around the same time as the Scheme. As such, the effects of decommissioning are likely to be similar to those or less than during construction. The cumulative effects on important ecological features during decommissioning would therefore not be significant.	The Applicant notes this comment and agrees with the statements therein.
NNC 8.114	Local Impacts – Ecology and Biodiversity	To conclude, with regard to ecology and biodiversity the construction on Sites C-F, and the BESS, will result in longer term but relatively geographically confined impacts, while the Cable Route will result in temporary but much more widespread impacts which currently are less defined and precise in detail. The principal site of significance in terms of the likely impacts of construction is clearly the Upper Nene Valley Gravel Pits SPA, which could experience direct or indirect impacts through noise	The Applicant would clarify, in response to the comment that "generally surveys relating to ecology and biodiversity are ongoing" that all ecological surveys to inform the baseline assessment are now complete, and are reported in the updated **ES Chapter 9: Ecology and Biodiversity (Revision A) [REP1-033]** and accompanying appendices submitted at Deadline

LIR Ref.	Topic Area	Summary	Applicant's Response
		and visual disturbance, contamination from dust or other arisings. No construction would take place in any of the designated sites. Generally surveys relating to ecology and biodiversity are ongoing and various mitigation measures are proposed. With the application of these mitigation measures, no significant residual effects on Ecology and Nature Conservation have been identified during construction of the Scheme. Once constructed, further mitigation measures are proposed which would result in significant moderate beneficial effects to a range of habitats. The effects of decommissioning are likely to be similar to those experienced during construction although at this stage these are speculative considerations given the proposed 60 year operational period. Therefore NNC consider that in respect of ecology, the impact identified is neutral subject to appropriate wording of Requirements and plans and documents therein identified. Subject to the imposition of such Requirements, the Scheme would be in compliance with Local Plan Policies 4 and 26 (h) of the JCS.	1. Please also refer to the Applicant's response to NNC 8.84 and NNC 8.75 in respect of the cable route corridor with regard to the residual effects on ecological receptors during the construction phase. Otherwise, the Applicant notes this comment and agrees with the statements therein.
NNC 8.119	Local Impacts – Cultural Heritage	Key Impacts Archaeology The impacts on below ground archaeology from the construction phase are as discussed in the ES Cultural Heritage Chapter (APP-049). There is some uncertainty as to the impacts of decommissioning (see below), but the ES Chapter (APP-049) refers to fencing off archaeological preservation areas during decommissioning and the agreement of a Decommissioning Environmental Management Plan.	The Applicant notes this comment. As stated in Paragraph 12.4.34 of **ES Chapter 12 Cultural Heritage [APP-049]**, there is a degree of uncertainty regarding decommissioning. As stated in Paragraph 12.7.18 of **ES Chapter 12 Cultural Heritage [APP-049]**, a Decommissioning Environmental Management Plan will be agreed with the Archaeological Advisor to the relevant Local Planning Authority prior to decommissioning. Temporary fencing will be erected around 'no

LIR Ref.	Topic Area	Summary	Applicant's Response
			development' areas, which have been identified as requiring preservation in situ mitigation, and banksmen must be made aware of presence of archaeological remains.
NNC 8.120	Local Impacts – Cultural Heritage	APP-049 refers to biodiversity enhancement measures so there may be additional impacts from those.	The **Archaeological Mitigation Strategy (AMS) [APP-146]** includes scope for archaeological monitoring where intrusive landscape and ecological mitigation is proposed in areas of low archaeological potential. As detailed in the **OLEMP Revision A [REP1-137]** indicative pond locations have been outlined on the Landscape and Ecology Mitigation Plans for Green Hill E, F and BESS **[APP-212 to APP-218**, **REP1-113**, **REP1-115].** These will be positioned to avoid archaeological remains. Where this is not possible archaeological mitigation in the form of strip, map and sample can be undertaken in line with the methodology provided in the AMS.
NNC 8.121 to 8.122	Local Impacts – Cultural Heritage	There are numerous below ground heritage assets known from the HER (recorded as cropmarks) and from field evaluation as detailed in the ES (APP-049). The evaluation has largely been successful in identifying areas where mitigation (whether preservation in situ or preservation by record) will be needed. Some areas will require evaluation post-consent and this has been agreed and accepted by all parties, and is stated in the Archaeological Mitigation Strategy (AMS) (APP-146).	The Applicant agrees that the archaeological evaluation has been successful in identifying concentrations of archaeological remains that require mitigation **[APP-121** to **APP-145]**. Where required, appropriate mitigation is proposed in Section 12.7 of ES **ES Chapter 12 Cultural Heritage [APP-049]** and the archaeological mitigation strategy provided in **ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
		There are two recorded WWII aeroplane crash sites in the vicinity of Mears Ashby but these are in areas which are being taken out of solar development according to the AMS.	The Applicant notes the location of the WWII aeroplane crash sites in Site E. No ground disturbance is proposed at the location of the crash sites as the fields in which they are located have been removed from solar elated infrastructure.
NNC 8.123 to 8.124	Local Impacts – Cultural Heritage	Impacts of decommissioning are not understood at present and will depend to some extent on the techniques to be used. The ES (APP-049) indicates that the impacts are expected to be in the same footprint as construction but this is uncertain as there is currently no precedent for techniques to remove solar panel piles after 60 years of use. We do not know what effects the soil chemistry will have and whether they will simply lift out of the ground, or whether they will need to be dug out – which will cause more damage. Research is being carried out and will inform future processes so the details of this will need to be provided at a later date – the decommissioning requirement includes the provision of a decommissioning plan. References to negligible effects on buried archaeology during decommissioning are unsupported by evidence. It will depend to some extent on the types of piles used; and having discussed this with the Applicant's Archaeological Consultant there is willingness to investigate the various options to find those with the lowest potential impact on the archaeology. It is therefore likely that a variety of techniques will be used across the site depending on local conditions.	As stated in Paragraph 12.4.34 of **ES Chapter 12 Cultural Heritage [APP-049]**, there is a degree of uncertainty regarding decommissioning. As stated in Paragraph 12.4.37 of **ES Chapter 12 Cultural Heritage [APP-049]**, it is not envisaged that there would be any further impacts to buried archaeological remains beyond that experienced during the construction and operation phases. If works are required during the decommissioning phase of the Scheme, that have the potential to cause additional impacts to buried archaeological remains, an assessment would be required to ascertain the extent of impact and appropriate mitigation in line with the **ODS Revision A [REP1-135]**. Conversations are ongoing with the North Northamptonshire County Archaeologist about the different options for piling as detailed in Table 3.11 of the Statement of Common Ground **[EX2/GH8.3.1]**.
NNC 8.125	Local Impacts – Cultural Heritage	Requirements The archaeology Requirement refers to the AMS (APP-146) which is acceptable, and does state "No part of the authorised	The Applicant notes this comment and agrees that the AMS provides appropriate mitigation and archaeological impacts can be suitably managed

LIR Ref.	Topic Area	Summary	Applicant's Response
to 8.126		development may be commenced" which is suitably inclusive. Further details for the type of mitigation and piling will be decided once detailed design information is available post-consent, so a more detailed Requirement for archaeology is not possible at present. It is considered that the archaeology impacts are ongoing and could be managed by suitable Requirements. The Scheme would be in compliance with Local Plan policies 2 and 26 (c) of the JCS in this regard and the archaeology impact of the proposals is considered neutral.	by Requirement 12 of the **Draft DCO Revision A [REP1-008]**.
NNC 8.127 to 8.130	Local Impacts – Cultural Heritage	Built Heritage There are no listed buildings or conservation areas located within the Order Limits. There is some disagreement as to whether there are any non-designated heritage assets located within the Order Limits. A total of 413 listed buildings were identified within the Study Area, of which 61 were taken forward for further assessment as these were considered to have the potential to be impacted by the proposed solar farm areas. A total of 84 non-designated (built) heritage assets were identified within the Study Area, of which 33 were taken forward for further assessment as these were considered to have the potential to be impacted by the proposed solar farm areas. A total of 37 conservation areas were identified within the Study Area, of which 4 were taken forward for further assessment as these were considered to have the potential to be impacted by the proposed solar farm areas.	As detailed in Section 12.4 of **ES Chapter 12 Cultural Heritage [APP-049]** a comprehensive assessment methodology was followed to identify assets where there was a potential for harm which should be considered as part of the assessment. Appendix 1 of **ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]** details assets scoped in for assessment and was used during consultation with the North Northampton Conservation Officer. Scoped in assets are considered to be agreed (see **ES Appendix 12.8 Consultation Tables [APP-148]**. The Applicant notes the summary of assets identified for assessment.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.127 to 8.130	Local Impacts – Cultural Heritage	Green Hill C It is agreed that Green Hill C is not likely to result in harm to any listed buildings or conservation areas. Taken overall, and considering the proposed mitigation, it is considered that the Scheme will result in residual less than substantial harm to the following non-designated (built) heritage assets: • Woodlodge Farm (SP830682)	The Applicant agrees that Green Hill C would not result in harm to any Designated Heritage Assets. **ES Chapter 12 Cultural Heritage [APP-049]**, supported by **ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]** identified that a residual less than substantial harm (in NPPF terms) would occur to Woodlodge Farm (SP830682), which is not significant in EIA terms.
NNC 8.133 to 8.134	Local Impacts – Cultural Heritage	Green Hill D It is agreed that Green Hill D is not likely to result in harm to any listed buildings or conservation areas. Taken overall, and considering the proposed mitigation, it is considered that the Scheme will result in residual less than substantial harm to the following non-designated (built) heritage assets: • Highfields Lodge (SP845685) • The Grange (SP843674)	The Applicant agrees that Green Hill D would not result in harm to any Designated Heritage Assets. **ES Chapter 12 Cultural Heritage [APP-049]**, supported by **ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]** identified that a residual less than substantial harm (in NPPF terms) would occur to Highfields Lodge (SP845685) and The Grange (SP843674), which is not significant in EIA terms.
NNC 8.135 to 8.136	Local Impacts – Cultural Heritage	Green Hill E Taken overall, and considering the proposed mitigation, it is considered that the Scheme will result in residual less than substantial harm to the following designated heritage assets: • Mears Ashby Conservation Area • Grade II listed The Old Farmhouse (LEN: 1371722) • Grade II listed 5, Duchess End (LEN: 1191195)	Applicant agrees that Green Hill Site E would result in less than substantial harm to the assets listed. As a point of clarity, with the exception of Mears Ashby Conservation Area, the adverse effect to the listed assets is not considered significant in EIA terms.

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Grade II listed Crabtree Cottage Dale Farm Cottage (LEN: 1191402) • Grade II listed The Cottage (LEN: 1287024) • Grade II listed Village Farmhouse and Attached Barn (LEN: 1040702) Taken overall, and considering the proposed mitigation, it is considered that the Scheme will result in residual less than substantial harm to the following non-designated (built) heritage assets: • Cart hovel c.15m south-west of Hill Farmhouse (HER Ref: 1995/8/4) • Barn & Stable c.30m North of No.32 Wilby Road (The Cottage) HER Ref: 1995/9/2) • South Range (HER Ref: 1995/0/23) • Wilby Hall (SP849679) • The Grange (SP843674) • Hockerill Farm (SP855653) • Ward's Barn (SP840658) • Slype House (SP897591) • Top Farm (SP881595) • Barn and Fold (SP887589) • Farmstead (SP8900589)	As assessed in **ES Chapter 12 Cultural Heritage [APP-049]**, a moderate adverse residual effect was identified to Mears Ashby Conservation Area. The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.137	Local Impacts – Cultural Heritage	Green Hill BESS It is agreed that the BESS is not likely to result in harm to any listed buildings, non-designated (built) heritage assets, or conservation areas.	The Applicant agrees that the BESS site will not cause any impact to heritage assets.
NNC 8.138 to 8.140	Local Impacts – Cultural Heritage	Green Hill F Taken overall, and considering the proposed mitigation, it is considered that the Scheme will result in residual less than substantial harm to the following designated heritage assets: • Easton Maudit Conservation Area • Grade II listed Low Farmhouse (LEN: 1371681) • Grade II listed Park Farmhouse (LEN: 1189605) • Grade II listed The Old Vicarage (LEN: 1040782) • Grade II listed 10, High Street (LEN: 1040783) • Grade II listed Limes Farmhouse (LEN: 1189643) • Grade II listed Barns Attache to South Of Manor Farmhouse (LEN: 1371682) • Grade II listed The Old Farmhouse (LEN: 1189658) • Grade II listed Manor Farmhouse (LEN: 1189637) • Grade II* listed 22 High Street (LEN: 1040784) • Grade II listed Number 25 (Old School House) and Number 26 (LEN: 1371683) • Grade II listed Well House (LEN: 1294160)	Applicant agrees that Green Hill Site E would result in less than substantial harm to the assets listed. With the exception of the Easton Maudit Conservation Area and Grade I and II* Listed Buildings, the adverse effect to the listed assets is not considered significant in EIA terms. As assessed in **ES Chapter 12 Cultural Heritage [APP-049]**, a moderate adverse residual effect was identified to Easton Maudit Conservation Area and Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784). The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels. The Applicant notes Paragraph 5.9.27 of NPS EN-1. The Applicant highlights Paragraph 5.9.32 if NPS EN-1, which states: *"Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use."* The

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Grade I listed Church of St Peter and St Paul (LEN: 1189610) • Grade II listed Home Farmhouse (LEN: 1040785) Taken overall, and considering the proposed mitigation, it is considered that the Scheme will result in residual less than substantial harm to the following non-designated (built) heritage assets: • Wall associated with former site of Easton Maudit Manor NPS EN-1 confirms that 'great weight' should be given to the conservation of a designated heritage asset and that the desirability of preserving heritage assets should be given 'considerable importance and weight'. It also reiterates that 'the more important the asset, the greater the weight should be', irrespective of the degree of harm. Great weight should be given to the conservation of each designated heritage asset noted above, with greater weight given to the conservation of the Church of St Peter and St Paul (Grade I listed) and 22 High Street (Grade II* listed). As a Grade I listed building the church is of 'exceptional interest' and the Grade II* listed building is a 'particularly important building of more than special interest'. There is a combined harmful effect on thirteen designated heritage assets within Easton Maudit which, other than one, are within the Easton Maudit Conservation Area. Overall, the proposed scheme has a marked negative impact on the historic (built) environment of the Easton Maudit area due to the concentration of assets experiencing harm, but in the planning balance, great weight should still be given to the conservation of each of the heritage assets individually; that is to 'the process of	Applicant considers the public benefits of the Scheme outweigh any potential harm identified to heritage assets or the Conservation Area as detailed in Section 4 of the **Planning Statement Revision A [EX2/GH7.15_A]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
		maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.	
NNC 8.141	Local Impacts – Cultural Heritage	Overall, and with regards to the historic built environment of North Northamptonshire only, the findings and conclusions of Chapter 12 (APP-049) are, largely, agreed. There is, however, disagreement as to whether 3 no. non-designated (built) heritage assets are located outside of the Order Limits (Woodlodge Farm (farmstead) in Site C, Hockerill Farm (farmstead) in Site E, and Ward's Barn (a Barn) in Site E). It is NNC's view those identified above are located within the Order Limits. Nevertheless, this does not alter the identified level of harm.	The Applicant notes the agreement to the findings and conclusions to **ES Chapter 12 Cultural Heritage [APP-049]**. The Order Limits of the Scheme runs adjacent to the property boundary of the three non-designated assets listed but does not include the buildings. There would be no direct impact to the buildings as evidenced by the illustrative layout plans **[APP-196 to APP-198 and APP-200]**. The applicant notes that North Northamptonshire Conservation Officer is in agreement with the assessment of the level of harm identified by **ES Chapter 12 Cultural Heritage [APP-049]** irrespective of the assets being located within or outside of the Scheme Order Limits.
NNC 8.142 to 8.144	Local Impacts – Cultural Heritage	Summary The proposed BESS will not result in harm to any designated or non-designated (built) heritage assets. Green Hill C will result in harm to one non-designated (built) heritage asset. Green Hill D will result in harm to two non-designated (built) heritage assets. Green Hill E will result in harm to one conservation area, 5 listed buildings, and 11 non-designated (built) heritage assets. Green Hill F will result in harm to one conservation area, 13 listed buildings, and 1 non-designated (built) heritage asset. There is potential for some heritage assets to be further impacted through the cumulative effects of the following three schemes:	As assessed in **ES Chapter 12 Cultural Heritage [APP-049]**, a moderate adverse residual effect was identified to the Mears Ashby and Easton Maudit Conservation Area and Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784). Otherwise where harmful impacts to the significance of heritage assets have been identified, they are not considered significant in EIA terms.

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Land Rear 260 Northampton Road And Near Wordsworth Road Park Farm • Way Wellingborough Northamptonshire, residential scheme (NNC planning reference WP/15/00727/OUT) • Glenvale Park Phase 2 Development Site Niort Way Wellingborough (NNC planning reference NW/24/00138/OUT) • Grendon Lakes Main Road Grendon Northampton NN7 1JW, BESS development (NNC planning reference NW/23/00360/FUL). In regard to built heritage, there are no listed buildings or conservation areas located within the Order Limits. There is some disagreement as to whether there are any non-designated heritage assets located within the Order Limits. The proposed BESS will not result in harm to any designated or non-designated (built) heritage assets. Green Hill C will result in harm to one non-designated (built) heritage asset. Green Hill D will result in harm to two non-designated (built) heritage assets. Green Hill E will result in harm to one conservation area, 5 listed buildings, and 11 non-designated (built) heritage assets. Green Hill F will result in harm to one conservation area, 13 listed buildings, and 1 non-designated (built) heritage asset. ADD the combined effects of harm to the conservation area and listed buildings – Easton Maudit - MARIA providing. To conclude the impacts from built heritage are identified as adverse and the Scheme would be in conflict with Local Plan Policies 2 (a), (b) and (c) and 26 (c) of the JCS.	No cumulative impacts on any heritage assets have been identified as a result of the Scheme or other identified development schemes as listed in Section 12.11 of **ES Chapter 12 Cultural Heritage [APP-049]** and noted by North Northamptonshire LPA. The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels. The Applicant acknowledges Policies 2 (a), (b), (c) and 26 (c) the Scheme design has been formalised to reduce as far a possible impacts to heritage assets with consideration to their surrounding historic environment and key views (including consideration to churches).

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.148	Local Impacts – Highways and Transportation	Key Impacts The Local Highway Authority (LHA) advises the SoS should consider any substantial impacts of traffic and subsequently should ensure that the Applicant has sought to mitigate these impacts, including during the construction phase of the development. Should the proposed mitigation measures be insufficient to reduce the impact on the transport infrastructure to acceptable levels, the SoS should consider Requirements to mitigate adverse impacts on the Local Highway network arising from the development. The LHA has no in principle objection to this proposal providing such measures are secured.	The Applicant notes the comments made by the LHA. The mitigation that is proposed is secured through the **OCTMP Revision A [REP1-145]**. This is secured by Requirement 15 in Schedule 2 of the **Draft DCO Revision A [REP1-008]**.
NNC 8.149	Local Impacts – Highways and Transportation	Traffic and Transport The LHA has reviewed the Transport and Access Chapter and relevant appendices of the ES (APP-150 – APP-153). The proposed accesses are still under review as we seek additional information.	The Applicant notes the comments made by the LHA and will seek clarification over the level of additional information required.
NNC 8.151	Local Impacts – Highways and Transportation	The Council in its capacity as LHA is still reviewing the application documents. The Council's initial review considers that the assessment within the Environmental Statement Chapter 13 (Appendix 13.2: Transport Assessment) (APP-150 – 153) and the Outline Construction Traffic Management Plan (APP-553) is appropriate and provides a reasonable estimate of HGV and car traffic that would be associated with the development.	The Applicant notes the comments made by the LHA and agreement in respect of forecast traffic generation.
NNC 8.152	Local Impacts – Highways and Transportation	In terms of traffic and transport effects, the LHA considers the assessment in the Traffic and Transport chapter to be reasonable, however, mitigation measures are required for this development and these need to be secured through the DCO. Subject to the necessary mitigations in the form of upgraded or	The Applicant notes the comments made by the LHA, the considered reasonableness of the assessment and requirement to ensure mitigation measures are secured "Mitigation measures are secured through the delivery of a Construction

LIR Ref.	Topic Area	Summary	Applicant's Response
		new accesses and potentially suitable passing places being secured and implemented, the Council concludes that traffic and transport impacts during the construction phase would be negative but not severe in the context of the NPPF. Traffic and Transport impacts during operation, and decommissioning would be neutral.	Traffic Management Plan in accordance with the **Outline Construction Traffic Management Plan [REP1-145]** by requirement 15 of the **Draft DCO Revision A [REP1-008]**. The Applicant is willing to discuss requirements in detail as required by the LHA and will progress these discussions through the development of the Statement of Common Ground **[EX2/GH8.3.1]**.
NNC 8.153	Local Impacts – Highways and Transportation	The construction traffic has been estimated from first principles, and NNC considers that the methodology is acceptable. Baseline data comprises traffic survey information for highway links within the Study Area. This is based on a combination of Automatic Traffic Count (ATC) data and traffic count data sourced from the Department for Transport (DfT).	The Applicant notes the comments made by the LHA and the confirmation that the estimates of construction traffic are acceptable.
NNC 8.154 to 8.158	Local Impacts – Highways and Transportation	Whilst the TA mentions that there will be 'provision of parking on-site, to ensure that vehicles are not parked on the local highway network alongside monitoring to ensure this is being adhered', no assessment of parking demand or requirements is provided. A detailed assessment of parking requirements shall be provided to include all staff and visitor car requirements and sustainable travel drop off areas and layover for HGV's. This can be secured through a Requirement. The LHA raise concerns regarding the TA's assumption that 50% of the workforce (approximately 280 out of 561 workers) will be accommodated in local hotels and transported daily via shuttle bus. This assumption significantly reduces the projected number of car-based trips to and from the site.	As noted, hotels across various settlements may be utilised by construction workers. Shuttles may also be used to collect workers from other locations such as stations or locations within settlements. The commitment to prepare a construction worker Travel Plan is made in the **OCTMP (Revision A) [REP1-145]** and will control car travel. The use of shuttle buses is common across large-scale construction sites. The principle of providing these facilities for workers, not all of whom will have access to a private vehicle, is established through other solar proposals that have been examined through the DCO process. The 50%

LIR Ref.	Topic Area	Summary	Applicant's Response
		However, a preliminary review of local hotel availability suggests that sufficient accommodation within a reasonable shuttle distance may not exist to support this volume of workers. If this assumption proves inaccurate, the number of daily car trips could be substantially higher than estimated, leading to increased traffic, parking demand, and environmental impact. The LHA requests a sensitivity analysis using more conservative assumptions about hotel availability and worker transport modes. This will ensure that traffic impacts are properly assessed and mitigated.	figure is usual. The following considerations of the proportion of workers that will use shuttle buses to access various Solar Schemes have been made for Schemes approved through the DCO process: • Gate Burton Energy Park - 55% • Beacon Fen Energy Park - 55% • Tillbridge Solar Project - 47% • West Burton Solar Project - 50% • Stonestreet Green Solar - 75% • Longfield Solar Farm - 55% • Cottam Solar Project - 50% Additionally, the need to minimise the scale of compound space within each Site will necessitate the use of shuttles to minimise as far as practicable the number of vehicles that need to be accommodated. It would not be reasonable to provide a compound area that assumes a vehicle per construction worker.
NNC 8.159 to 8.161	Local Impacts – Highways and Transportation	The LHA will need to see drawings showing all accesses, including details of the highway boundary, swept paths and the required visibility splays (horizontal and in some cases vertical splays too) alongside any vegetation (hedgerows/trees) requiring removal. These detailed and scaled drawings should be accompanied by a Stage 1 Road Safety Audit to GG119.	Drawings for access points proposed for the Scheme are provided in **ES Appendix 13.2 Transport Assessment Part 3 of 3 [APP-153].** These drawings provide detailed information such as highway boundary, swept paths and the required horizontal visibility splays. The access points proposed for construction and operation are set out in the **OCTMP Revision A**

LIR Ref.	Topic Area	Summary	Applicant's Response
		It should also be confirmed if all accesses are to be made permanent for use during the operation phase or otherwise decommissioned. The LHA seeks confirmation that all access junctions will be hardbound for the distance of the longest vehicle serving the site to prevent debris being brought out onto the public road network and with gates set back at the same distance from the highway boundary. This does not accommodate the maximum legal 'Wear and Tear' agreements (secured through a Section 59 licence) that shall be required for all construction routing and shall be included in the Outline Construction Traffic Management Plan (OCTMP) (APP-553) or otherwise secured through this process and include details of a pre and post works highway condition survey with timescales for implementation of any repairs necessary alongside securing means for emergency repair works during the construction phase.	**[REP1-145]** and the **OOTMP Revision A [REP1-157].** The surface treatment for each access will be subject to the detailed design of each access. Gates will be set back from the highway to accommodate larger vehicles. The **OCTMP (Revision A) [REP1-145]** contains a commitment to undertake condition surveys and rectify damage to the highway during the construction phase. Further details will be subject to a detailed Construction Traffic Management Plan which will be in accordance with the **OCTMP (Revision A) [REP1-145].** Requirement 15 in Schedule 2 of the **Draft DCO Revision A [REP1-008]** requires that the requirement is discharged by the relevant highway authority
NNC 8.162	Local Impacts – Highways and Transportation	After construction the LHA require the highway and any road gullies within 500 metres either side of each access to be cleaned. This should also be included in the OCTMP and linked to the dilapidation survey to account for any post construction repair works.	The comment is noted and will be considered through a further revision to the **OCTMP (Revision A) [REP1-145] f**ollowing discussions with the highway authority with the intent to submit for Deadline 3.
NNC 8.163 to 9.170	Local Impacts – Highways and Transportation	Abnormal Loads Routing A review of abnormal load routing has been conducted by the LHA's Structures Team. This involved assessing any implications on bridges. The values that have been calculated are approximations as the location of the trailers over the bridge will vary. The Authority	The Applicant notes the comments made by the LHA. Further consideration and consultation and discussions with the LHA will be made prior to notices for Abnormal Load movements being made as part of the construction of the Scheme.

LIR Ref.	Topic Area	Summary	Applicant's Response
		does not have the designed bending and shear loads of the bridges in question. 1428 Broughton Hill (A43 Broughton Bypass - https://w3w.co/joyously.cover.emulating) Whilst we do not have any design calculations or assessments for this bridge the below bearing schedule indicates that that abnormal loads may have been taken into consideration as part of the design. Self-weight of load 183 tonnes = 1,824 kN; Self-weight of trailer 86.8 tonnes = 851 kN; Centreline to centreline of bearings is 10.710m. Half of the 16 axle girder frame trailer will be completely on the bridge thus the loading on the bridge = 1,338 kN therefore the loading on each abutment will be 669 kN spread over 6 bearings although this is based upon an even spread. It would appear that the bridge should be able to carry the load. 1206 – Easton Lane (crossing over A509 Bozeat Bypass). Location link: https://w3w.co/artist.earpiece.outsize) In accordance with the bearing schedule the bridge should be able to carry the load, however, as mentioned above we have cannot confirm the designed bending and shear loads of the bridge in question.	

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.171 to 8.174	Local Impacts – Highways and Transportation	Public Rights of Way There are a number of PRoW that run through or nearby each Site or within the vicinity of the Cable Route Corridor. These are detailed in the Outline PRoW and Permissive Paths Management Plan (APP-554). With respect to construction works to be carried out in close proximity to and using PRoW as access, please note the following standard requirements: - • The routes must be kept clear, unobstructed, safe for users, and no structures or material placed on the right of way at all times, it is an offence to obstruct the highway under Section 137 HA 1980. • There must be no interference or damage to the surface of the right of way as a result of the construction. Any damage to the surface of the path must be made good by the applicant, specifications for any repair or surfacing work must be approved by the Area Rights of Way Officer, (as per Section 131 HA1980). • If as a result of the development, i.e. the safety of the public cannot be guaranteed, the Right of Way needs to be closed, and a Temporary Traffic Regulation Order would become necessary and would need to be secured as part of the DCO process. • Any new path furniture such as a gate can only be authorised if needed for the ingress or egress of livestock (Section 147 Highways Act 1980) and needs to be approved in advance	The Applicant confirms that the measures committed to in the **OPROWPPMP Revision A [REP1-147]** (secured through Requirement 18 of Schedule 2 to the **Draft DCO Revision A [REP1-008]**) conform to the standard requirements set out by NNC. Furthermore, the **Draft DCO Revision A [REP1-008]** contains all necessary powers (including but not limited to Temporary Traffic Regulation Order powers) to ensure that closures or temporary diversions of PRoWs can be applied. Finally, the Applicant points to Requirement 18 of Schedule 2 to the **Draft DCO Revision A [REP1-008]**, which secures the requirement for a detailed PRoW (and permissive path) management plan substantially in accordance with the outline version of the plan, to be submitted to and approved by the relevant planning authorities (in their role as local planning authority and highway authority). This will therefore provide full detail of works affecting any existing public right of way, and full details of any enhancement measures, improvement, diversion or closures. The Applicant can confirm that there are no proposed permanent diversions of any PRoW's.

LIR Ref.	Topic Area	Summary	Applicant's Response
		with the Area Rights of Way Officer, standard examples can be provided. Diversion Orders: The Definitive Map team are responsible for diversions carried out under the Highways Act, however, diversions required under the Town and Country Planning Act are the responsibility of the Local Planning Authority. The Applicant needs to confirm if such measures are required. In regard to Requirements and PROW, it is suggested the following is applied: "Prior to the commencement of works affecting any existing public right of way, full details of any enhancement, improvement, diversion or closure shall be submitted to and gain the approval of the local planning authority".	
NNC 8.171 to 8.175	Local Impacts – Highways and Transportation	Public Transport Whilst Public Transport details have been provided, the LHA notes and is minded to advise the SoS that the sites should not be considered sustainable development in terms of walking, cycling and the use of Public Transport to travel to them. It is noted that no site is in excess of 10 miles from the nearest train station, but details of how commuters would get from those stations to the development has not been provided. No details of bus routes or nearest stops have been provided, however is not deemed to be viable that construction workers would utilise these services in any event.	The Applicant notes the comments made by the LHA and it is agreed that public transport is unlikely to provide a role in the immediate access to the Scheme. However, the use of dedicated shuttle services will provide shared travel access to the Scheme. These will be used to connect workers to the site from origins such as local hotels and travel hubs such as local railway stations.
NNC 8.176	Local Impacts – Highways and Transportation	Glint and Glare The LHA seeks all appropriate local roads to be included in the glint and glare assessment. We acknowledge that some local	The Applicant acknowledges this comment. At Issue Specific Hearing 1 there was an action (no.8) **[EV5-009]** on the Local Planning Authorises to provide the Applicant with a list of local roads.

LIR Ref.	Topic Area	Summary	Applicant's Response
		roads carry few numbers of vehicle trips however others carry more significant numbers and their assessment shall be carried out in the interests of highway safety.	To date this information hasn't been provided to the Applicant. Once received, the Applicant will consider the local roads in respect of the Glint and Glare assessment **[APP-052]** at the appropriate time.
NNC 8.177	Local Impacts – Highways and Transportation	During the construction phase of the development, it is advised that the SoS consider any substantial impacts of traffic and ensure that the Applicant has sought to mitigate any adverse impacts which could be via Requirements. The LHA has no in principle objection to this proposal providing such measures are secured. Whilst the proposed traffic impacts during construction would be negative, they would not be severe in the context of national policy. Overall it is considered that during construction phases the impact is considered adverse, during operation and decommissioning, the impacts would be considered neutral. The Scheme would be in compliance with Local Plan policy 8 (b) (i) (ii) of the JCS subject to the suggested Requirements.	The comments made by the highway authority are noted. Measures are principally outlined in the **OCTMP (Revision A) [REP1-145]** together with a commitment to produce a detailed CTMP and seek the approval of the highway authority prior to commencement. The **Draft DCO Revision A [REP1-008]** makes further allowances for securing measures such as traffic calming and the details of access arrangements.
NNC 8.178 to 8.180	Local Impacts – Water Environment	**Water Environment** NPS EN-1 (Section 5.16) sets out that SoS should consider whether appropriate requirements should be attached to any development consent and/or planning obligations entered into to mitigate adverse effects on the water environment. The NPPF at Section 14, seeks to ensure that climate change is considered for long term factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should therefore be planned to avoid increased vulnerability to the range of effects arising from climate change. Where new development is brought forward in areas which are vulnerable to the range of effects arising from climate	Noted. The Scheme has been designed in accordance with NPS EN-1, the NPPF and Policy 5 of the North Northamptonshire Joint Core Strategy. The **FRADS Revision A [REP1-053]** and supporting Annexes **[APP-100 to APP-108]** confirm that flood risk and surface water are appropriately managed through sustainable design measures consistent with these policies.

LIR Ref.	Topic Area	Summary	Applicant's Response
		change, care should be taken to ensure that flood risk can be managed through sustainable adaptation measures. The JCS at policy 5 sets out a raft of sub policies aimed at preventing or reducing flood risk.	
NNC 8.181 to 8.184	Local Impacts – Water Environment	Introduction As the Lead Local Flood Authority (LLFA) for NNC, the Council is a statutory consultee on matters relating to surface water and local flood risk under the Flood and Water Management Act 2010. The LLFA provides technical advice to the LPA on drainage and flood risk matters, supporting the design and implementation of effective and appropriate drainage solutions. This section of this Report provides an objective assessment of the potential effects of the Green Hill Solar Farm and BESS development on local flood risk, surface water management, and existing drainage infrastructure. It reflects previous LLFA consultation responses, which highlighted several queries and advised that certain issues would need to be addressed in more detail once the design layout and drainage proposals are finalised. The assessment draws primarily on Chapter 10 (Hydrology, Flood Risk and Drainage) of the ES (APP-047) and its associated Flood Risk Assessments and Drainage Strategy Appendices. The LLFA's remit covers consideration of both the construction and operational phases of the development, with particular focus on ensuring that:	Noted. The Applicant welcomes the LLFA's ongoing technical input. The **FRADS [REP1-053]** and supporting annexes **[APP-100 to APP-108]** confirm that panelled areas will remain largely permeable and will manage runoff through passive infiltration and natural drainage, consistent with the existing greenfield condition. Formal drainage and attenuation will be provided only for infrastructure areas such as the BESS compounds, substations and access roads. These systems will be designed to restrict discharge to greenfield rates and will be maintained for the lifetime of the Scheme. The approach accords with the NPPF, NPS EN-1 and Policy 5 of the North Northamptonshire JCS. Detailed hydraulic design and maintenance arrangements will be confirmed post-consent in consultation with the LLFA through the DCO requirements.

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Surface water runoff from the proposed development is managed to mimic greenfield conditions and does not increase flood risk to adjacent land or property. • Proposed drainage systems are designed and maintained to an appropriate standard over the lifetime of the development. • Opportunities for sustainable drainage features (SuDS) are maximised, delivering benefits for water quality, biodiversity, and climate resilience. • Potential cumulative impacts with other nearby developments are fully understood and appropriately mitigated. The LLFA's assessment is based on a review of available mapping and local evidence, including the Strategic Flood Risk Assessment (SFRA) and Surface Water Management Plan (SWMP). This section provides technical input to the LIR to support the consideration of the DCO.	
NNC 8.185 to 8.189	Local Impacts – Water Environment	<u>Existing Conditions</u> The proposed development covers several land parcels located within a predominantly rural and agricultural setting. The area is characterised by gently undulating topography, with ground levels generally falling towards a network of ordinary watercourses and field drainage ditches that form part of the wider catchment. Land use within and surrounding the site predominantly comprises arable farmland, interspersed with hedgerows, grassed margins, and small woodland blocks. Soils are generally free draining in places, though localised variability means infiltration potential must be confirmed through site-specific testing.	The baseline conditions described are consistent with those set out in the **FRA and Drainage Strategy [REP1-053]** and supporting **Annexes [APP-100 to APP-108]**. The Order Limits lie predominantly within Flood Zone 1, with only narrow areas of Flood Zones 2 and 3 confined to ordinary watercourses within Green Hill F and the BESS area. Where elevated flood risk was identified, detailed hydraulic modelling was undertaken for the River Nene, Grendon Brook and a minor field drain to the south of the BESS site (as reported in the **Hydraulic Modelling Technical Note**

LIR Ref.	Topic Area	Summary	Applicant's Response
		8.186 Hydrological data presented within the ES (APP-047) and supporting appendices indicates that the site lies predominantly within Flood Zone 1, meaning it is at low risk of fluvial flooding from main rivers. Localised areas associated with small watercourses and low-lying field drains, particularly within the Green Hill F and BESS2 parcels, extend marginally into Flood Zones 2 and 3, reflecting the presence of minor floodplains adjacent to these channels. The flood map is presented in Figure 2. Surface water flood mapping shows most of the site is at very low to low risk of surface water flooding. Limited sections typically located in shallow depressions or along existing field drains, show medium surface water risk, corresponding to ponding or shallow flow paths during extreme rainfall events. The surface water map is presented in Figure 3. The LLFA's local flood records indicate some instances of minor surface water accumulation on surrounding roads and low-lying fields during intense rainfall, but no significant historical flooding at the development parcels themselves. The site does not lie within an area at risk of reservoir or canal flooding, and risk from groundwater is expected to be low. Residual risk is considered low, with management to be addressed through a site-specific flood response and maintenance plan. The existing baseline indicates a low overall risk from local sources, though some minor flow paths and low points will require careful consideration during design to ensure the safe conveyance of exceedance flows.	**[EX2/GH8.2.2]**). These models confirmed that all built infrastructure lies outside the modelled floodplain and that residual risk is low. Surface-water and groundwater flood risk are also low, with only isolated flow paths and shallow depressions requiring local management. Panelled areas will remain largely permeable, and formal drainage will be limited to infrastructure areas such as the BESS and substations, designed to accommodate runoff from the 1 in 100-year + 40 % climate-change event. Residual risk will be managed through the final drainage design and maintenance plan secured under requirement 11 of the **Draft DCO Revision A [REP1-008]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.190 to 8.192	Local Impacts – Water Environment	Proposed Drainage Strategy The Applicant has prepared a series of site-specific Flood Risk Assessments (FRAs) and Drainage Strategies for each development parcel, which are presented within the ES (APP-047) and associated appendices. It is understood that runoff will be managed primarily through sustainable drainage features (SuDS) such as swales, infiltration areas, and attenuation storage, with discharge restricted to existing field drains and watercourses at rates equivalent to or lower than current greenfield conditions, to ensure that flood risk is not increased within the site or in downstream catchments. Key design principles: • Surface Water Management: Runoff from solar panel arrays, inverter platforms, and access tracks will be collected via shallow swales or grassed filter strips that promote infiltration and conveyance of flows to downstream attenuation features. • Attenuation and Storage: Attenuation is to be provided using a combination of swales, infiltration basins, and below-ground storage tanks, designed to accommodate rainfall events up to and including the • 1 in 100-year event plus an allowance for climate change (minimum 36% uplift in rainfall intensity as per current guidance). • Discharge Arrangements: Surface water will discharge to nearby ordinary watercourses or existing field drains, subject to agreement with the LLFA and landowners. Discharge rates will be restricted to the calculated greenfield runoff rate, with	The drainage approach described aligns with the **FRADS Revision A [REP1-053]** and supporting annexes **[APP-100 to APP-108]**. Runoff from panelled areas will infiltrate naturally through the permeable ground, maintaining greenfield conditions. Formal drainage is limited to infrastructure areas such as substations, BESS compounds and access tracks, where runoff will be managed through swales, infiltration basins or lined containment systems, with discharge restricted to existing field drains at greenfield rates. All systems are designed for the 1 in 100-year rainfall event plus 40 % climate-change allowance. Drainage serving the BESS and substation compounds will include lined containment and self-actuating shut-off valves to isolate and retain any contaminated or firewater runoff in accordance with the **OBSSMP Revision A [REP1-143]**. Routine inspection and maintenance will be secured through the DCO via Requirement 6 of Schedule 2 of the **Draft DCO Revision A [REP1-008]**. This approach accords with LLFA and NPPF requirements, ensuring post-development runoff does not exceed greenfield rates and that downstream flood risk is not increased.

LIR Ref.	Topic Area	Summary	Applicant's Response
		flow control devices (e.g. orifice plates or hydrobrakes) used to regulate outflows. • Permeable Surfaces: Internal access tracks and compounds will be formed from permeable materials such as crushed stone or gravel, promoting infiltration and reducing runoff volumes. • Equipment Platforms and BESS Infrastructure: Electrical equipment, transformer platforms, and BESS containers will be raised above surrounding ground levels to mitigate residual flood risk and allow exceedance flow to pass safely beneath or around structures. • Pollution Control: Drainage serving transformer or BESS compounds will incorporate pollution prevention measures, including impermeable liners and isolation valves to contain any accidental spillage or firewater runoff. The ES indicates that the proposed drainage system will be designed and maintained to current LLFA standards, with routine inspections and clearance of sediment from attenuation and conveyance features to maintain hydraulic efficiency. If implemented as described, it is expected to limit post-development runoff to greenfield rates, protect downstream receptors, and provide a degree of water quality treatment in accordance with the SuDS treatment hierarchy.	
NNC 8.193	Local Impacts – Water Environment	Key Issues The LLFA has reviewed Chapter 10 (Hydrology, Flood Risk and Drainage) of the ES (APP-047) and the supporting site-specific	The Applicant welcomes the LLFA's confirmation that the proposed approach is acceptable in principle and consistent with national and local policy. The **FRADS Revision A [REP1-053]** and

LIR Ref.	Topic Area	Summary	Applicant's Response
to 8.195		FRAs and Drainage Strategies. Based on the information provided, the proposed approach to surface water management is broadly consistent with the principles of sustainable drainage design and in line with both national and local policy requirements. The LLFA welcomes the Applicant's commitment to managing runoff through natural infiltration and attenuation features, maintaining greenfield runoff rates, and ensuring that no increase in flood risk occurs within or beyond the development boundary. However, as the design progresses towards detailed stage, several technical matters require clarification or further assurance to confirm long-term compliance with LLFA standards and best practice. At the detailed design stage, the Applicant will be expected to provide: • Detailed Design Confirmation: The current drainage concept is appropriate at outline level, but detailed hydraulic calculations, storage volumes, and discharge arrangements should be verified through a fully designed surface water drainage scheme. The LLFA will require confirmation that sufficient capacity is provided to manage the 1 in 100-year event plus climate change, and that the system has been modelled to demonstrate safe operation during exceedance events. • Exceedance Flow Routing: Although the site layout and natural gradients are conducive to overland flow dispersion, mapped exceedance routes for critical rainfall events must be clearly defined. This will ensure that	supporting annexes **[APP-100 to APP-108]** already establish an outline design that meets the 1 in 100-year + 40 % climate-change allowance standard and demonstrate that exceedance flow paths will follow existing topography without increasing flood risk to infrastructure or third parties. Detailed hydraulic calculations, storage sizing, infiltration testing and discharge verification will be completed post-consent as part of the detailed design stage, in consultation with the LLFA, under requirement 11 of the **Draft DCO Revision A [REP1-008]** for approval of the final surface-water drainage scheme. This will include exceedance flow mapping, maintenance schedules, and adoption arrangements. Construction-phase drainage controls will be addressed through the Construction Surface Water Management Plan as provided for within the **OCEMP [REP1-146]** and secured by requirement 13 of the **Draft DCO Revision A [REP1-008]**, which also sets out sediment, runoff, and pollution prevention measures. The Applicant will continue to liaise with the LLFA through detailed design to confirm infiltration feasibility and downstream capacity, ensuring that the final system remains fully compliant with SuDS standards and delivers no increase in flood risk.

LIR Ref.	Topic Area	Summary	Applicant's Response
		• flow paths are safely conveyed through or around the site without ponding near electrical equipment, access tracks, or sensitive infrastructure. • Maintenance and Adoption: Long-term maintenance responsibilities need to be confirmed. Maintenance and Management Plan will be ensured, specifying responsible parties and inspection frequencies for all SuDS components. • Construction Phase Drainage Management: The LLFA notes that temporary works during construction may increase runoff and sediment movement because of soil stripping and track formation. It is therefore anticipated that a Construction Surface Water Management Plan (CSWMP) will need to be developed at a later stage to address temporary drainage measures, sediment control, and pollution prevention. • Climate Change and Cumulative Impacts: A minimum 36% climate change allowance has been applied, which is considered appropriate for essential infrastructure of this scale and provides a suitable safety margin. In terms of cumulative effects, no significant in-combination impacts are anticipated when assessed alongside other consented or proposed developments, provided that all schemes apply equivalent surface water management principles. Continued coordination during the construction phase is encouraged to avoid any localised exceedance or drainage conflicts. • Verification of infiltration and discharge assumptions: No site-specific infiltration testing or confirmation of downstream watercourse capacity is currently available. This evidence will be critical before approving the final design.	

LIR Ref.	Topic Area	Summary	Applicant's Response
		While the proposed drainage strategy is acceptable in principle, further design detail, exceedance mapping, and clarity on maintenance arrangements are required to demonstrate that the development will remain compliant with national planning policy and current technical standards for sustainable drainage.	
NNC 8.196 to 8.203	Local Impacts – Water Environment	Mitigation and Recommendations The proposed development has been designed to minimise changes to existing hydrological conditions, with surface water drainage managed through sustainable methods. To ensure the system performs as intended during both construction and operation, a number of mitigation measures and commitments should be secured through appropriate Requirements. • Detailed Surface Water Drainage Scheme • Construction Surface Water Management Plan • Maintenance and Management Plan • Pollution Prevention and Water Quality Measures • Exceedance Flow Management • Post-construction Verification The above measures will ensure that the proposed development aligns with national planning policy and current technical standards for sustainable drainage. Implementation of these recommendations will help to secure a robust, maintainable, and sustainable surface water management system that protects local communities and the environment from increased flood risk. These measures are essential to demonstrate that the development will not increase flood risk and that the drainage	The mitigation measures listed are consistent with the commitments already secured through the application documents and the **Draft DCO Revision A [REP1-008]**. The **FRADS Revision A [REP1-053]** and supporting annexes **[APP-100 to APP-108]** set out the sustainable drainage approach and confirm that runoff will be managed to greenfield rates using infiltration and attenuation systems designed for the 1 in 100-year + 40 % climate-change event. The detailed surface-water drainage design, including exceedance management, maintenance and adoption arrangements, will be secured under the DCO Requirement for LLFA approval. Construction-phase drainage controls will be delivered through the Construction Surface Water Management Plan secured under the **OCEMP Revision A [REP1-146].** Pollution control and containment measures for the BESS and substation compounds are secured through the **OBSSMP Revision A [REP1-143].** Together, these mechanisms ensure compliance with national planning policy and SuDS standards,

LIR Ref.	Topic Area	Summary	Applicant's Response
		system can be effectively maintained throughout its operational lifetime.	maintaining existing hydrological conditions and preventing any increase in flood risk.
NNC 8.196 to 8.203	Local Impacts – Water Environment	Conclusion The key local policy (JCS Policy 5) relevant to the water environment requires proposals to assess and, where necessary, mitigate the potential impacts of development on flood risk both on and off site, proportionate to the scale of the scheme. Developments, including changes of use, must be supported by a site-specific FRA demonstrating that the scheme, including access and egress, will remain safe for its lifetime without increasing flood risk elsewhere and, where possible, will contribute to an overall reduction in flood risk. No part of the development should commence until written details of the surface water drainage scheme for that phase have been approved by the relevant planning authority. The submitted FRA and Drainage Strategy provide an initial indication of how surface water will be managed across the site. The proposals incorporate appropriate surface water drainage measures designed to mitigate local impacts. As the current information remains conceptual and lacks detailed technical evidence, the proposals are considered acceptable in principle, subject to the submission and approval of detailed design information before construction commences. Responsibility for preparing, implementing, and maintaining a compliant and effective surface water drainage scheme lies with the developer and their appointed designers. The ES (APP-047) demonstrates that surface water flood risk has been satisfactorily addressed. Runoff rates will be restricted to greenfield levels, and attenuation will be provided for the 1-in-	The Applicant welcomes the LLFA's conclusion that the proposed drainage approach is acceptable in principle and that, subject to securing detailed design through the DCO, the impacts on flood risk and drainage will be neutral and compliant with Policy 5 of the North Northamptonshire Joint Core Strategy. The **FRADS Revision A [REP1-053]** and **supporting annexes [APP-100 to APP-108]** demonstrate that all infrastructure has been located outside modelled floodplains and that surface water will be managed through sustainable drainage measures designed to limit discharge to greenfield rates and volumes for events up to the 1 in 100-year + 40 % climate-change allowance. Detailed design approval of each surface-water drainage scheme will be secured under requirement 11 of the **Draft DCO Revision A [REP1-008]** in consultation with the LLFA. The Applicant is seeking the agreement of the LLFA to disapply the requirement to obtain Ordinary Water Consents under the Land Drainage Act 1991 within the **Draft DCO Revision A [REP1-008]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
		100-year event plus an allowance for climate change. Impermeable areas, including those associated with the BESS and substations, have been identified, with indicative storage volumes calculated. Swales, detention basins, or ponds will provide the required attenuation. It is recognised that the cable route corridor would be required to cross a watercourse, and it is advised that this would require Land Drainage Consent. With the implementation of the proposed mitigation measures, both the Applicant and the Council consider that the effects on flood risk and drainage would be negligible and therefore not significant. The Council, as the LLFA, agrees with the principles set out in the FRA, subject to a suitably worded Requirement being attached to any consent granted. With this secured, the Council concludes that the impacts of the development in relation to flood risk and drainage will be neutral and in compliance with policy 5 of the JCS.	With these controls in place, the Applicant agrees that the Scheme will not increase flood risk on or off site and that the residual effects are neutral.
NNC 8.208 to 8.213	Agricultural Land Use	Agricultural Land Use Paragraph 5.11.12 of the NPS (EN-1) outlines that applicants should 'seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations'. Under Paragraph 5.11.34 of the NPS (EN-1), the decision maker should ensure that 'Applicants do not site their scheme on the best and most versatile agricultural land without justification. The SoS should also 'take into account the economic and other benefits of that land'.	The Applicant has conducted the Environmental Impact Assessment in accordance with the NPSs, NPPF and JCS and the Applicant has undertaken a 5-Stage Site Selection Process, widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area (**ES Appendix 5.1: Site Selection Assessment Revision A [REP1-037]**) in compliance with National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection, based on commercial feasibility and the efficiency of the transmission of electricity to the grid. The search

LIR Ref.	Topic Area	Summary	Applicant's Response
		The NPPF states that BMV is land in grades 1, 2 and 3a of the Agricultural Land Classification and recognises the economic and other benefits of such land (Paragraph 187). Footnote 65 states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The JCS supporting text to Policy 26 sets out that, 'Resource opportunities from biofuels and renewables will have to be balanced with food production needs. Such land-uses should avoid the use of the best and most versatile agricultural land where possible' (Paragraph 8.31). In regard to renewable energy, Paragraph 8.39 of the JCS states, 'If adverse impacts are identified and they are proven to be unavoidable, the proposal will be required to demonstrate that these have been minimised as far as possible. Where residual environmental effects remain after avoidance and minimisation, the level of harm and extent to which adverse impacts remain will be weighed against the public benefits of the proposal'. Policy 26 of the JCS at criteria (i) states that, 'Proposals for Solar Photovoltaic farms avoid the best and most versatile agricultural land'.	outcome indicates that the majority of the land within the 20km search area is Grades 3 or 2 land with high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results of the Scheme. Section 7 of the **Planning Statement Revision A [EX2/GH7.15_A]** concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the **Statement of Need [APP-556]** and confirmed in NPS EN-1 (see paragraphs 3.2.6 to 3.2.8), outweighs the reversible loss of 65% BMV agricultural land for the duration of the Scheme. The Applicant also notes that EN-3 (November 2023), paragraph 2.10.29 states that land type should not be the predominating factor in determining the suitability of a site for solar development and will be considered by the Secretary of State in making a decision on the application.
NNC 8.214	Agricultural Land Use	Key Impacts With regard to Sites C, D, E, F, BESS and the Cable Route Corridor, the Agricultural Land Classification (ALC) spans Grades 2, 3a and 3b (APP-057) and this is not disputed. It is also agreed that in the short term any potential effects are temporary and reversible. However given the cumulative spatial and temporal characteristics of the Scheme, the scale of the proposal and loss	The Applicant notes the Council comments. The restoration of the Sites and Cable Route Corridor to their former use and condition as far as practicable after construction and decommissioning is secured in Part 4 and Schedule 2, Requirement 21 of the **Draft DCO Revision A [REP1-008]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
		of agricultural land for a period in excess of 60 years would have an adverse impact. It needs to be secured via Requirement that the majority of the Sites and Cable Route Corridor will be returned to their former use and condition as far as practicable after construction and decommissioning and that it is likely that post-decommissioning, the landowners may return the Sites to arable use. This is particularly important as the agricultural land is an important contributor to the local economy and culture of the region.	
NNC 8.215	Agricultural Land Use	Cumulative With regards to the loss of agricultural land and soil resource, it is noted that all solar DCOs on agricultural land once decommissioned, would likely have no significant effect with regards to the degradation of quality or loss of soil resource. In addition, it is noted that cropland would be converted to grassland underneath the solar PV panels that can be used for sheep grazing. However, given the lifespan of 60 years this means a prolonged land occupation of the infrastructure impacting biodiversity and land use planning. There is the risk that over 60 years (plus decommissioning), farming methods change, as may the demand for food production (population growth). Taking such large expanses of agricultural land out of the area available for food production for a prolonged period of time is high risk and considered an adverse impact. The removal of BMV land is likely to put pressure on lower quality land that has lower yields or requires more inputs (fertiliser, irrigation etc). The cumulative effects with regards to soils and agriculture are therefore assessed as adverse.	The Applicant acknowledges the Council comments on the change of land use, potential increase of the demand on food production and the cumulative effects. The project is reliant on a package of avoidance, mitigation and enhancement measures to address impacts on biodiversity; this is discussed in **ES Chapter 9 Ecology and Biodiversity Revision A [REP1-033].** BMV land is very important to food production and national food security. However it is considered that the 1200ha land for the proposed Sites would not have a significant impact on national food production and security as it only represents 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK. In addition, the

LIR Ref.	Topic Area	Summary	Applicant's Response
			Sites can serve as a strategic land reserve underpinning national food security. The Council's comment on cumulative effect is in line with the conclusion in Section 20.11 in **ES Chapter 20: Agricultural Circumstances [APP-057].**
NNC 8.216 to 8.217	Agricultural Land Use	Requirements NNC would support Requirements that ensure that established habitats, such as hedgerows and woodland, be retained post-decommissioning. We would also support Management Plans that encourage sheep grazing to be able to occur post construction phase to ensure dual use of the land. A Construction Management Plan (APP-0545) and a Soil Management Plan (APP-0550) is proposed to ensure appropriate soil movements/storage take place during construction. The need for these to be secured through Requirements. Overall it is considered that the impact of the loss of BMV agricultural land is adverse and contrary to policy 26 (i) of the JCS.	The creation and management of valuable habitats, such as hedgerow and woodland; and the management of grassland areas via sheep grazing, is detailed within **OLEMP Revision A [REP1-137].** On decommissioning, the land is proposed to be reverted to agriculture, however, a full ecological survey will assess the habitats at the point of decommissioning to identify habitats of elevated value. Retention and loss of valuable habitats will need to accord with contemporary legislation and policy. This is set out within **ODS Revision A [REP1-135].** The Applicant has prepared the **OCEMP Revision A [REP1-131]** which sets out environmental protection commitments during the construction phase, and is secured by Requirement 13 of the **Draft DCO Revision A [REP1-008]**. An **OSMP [APP-550]** has been prepared to set out the soil management strategy, approach and key measures during construction, operation and decommissioning stages. The **OSMP [APP-550]**

LIR Ref.	Topic Area	Summary	Applicant's Response
			will be further developed into a detailed Soil Management Plan along with the results of Soil Resource Survey to be conducted at the Cable route as secured in Schedule 2, Requirement 19 of the **Draft DCO Revision A [REP1-008].**
NNC 8.225 / 8.231	Minerals and Waste	Key Impacts Green Hill F abuts mineral site M2 Strixton – Bozeat, which is allocated in Policy 4 but has not yet been subject to a planning application. The access road which connects site M2 to the A509 is also located within Green Hill F. To mitigate these potential impacts, Green Hill F will maintain a 30 metre stand-off between the M2 allocation and the nearest solar panels, and will retain the vehicular access. As such, it is considered that the proposal does not compromise the allocation and is therefore consistent with Policy 4.	The Applicant notes these comments
NNC 8.226	Minerals and Waste	The Applicant has set out in the ES (APP-061) how they will employ embedded mitigation measures and component recycling during the construction, operation and decommissioning phases of the development. The development is expected to generate significant amounts of waste from electrical and electronic equipment (WEEE). This includes the solar PV panels and transformers, which are anticipated to be replaced once during the operational phase, as well as the batteries and inverters, which are expected to be replaced every ten years. There are currently a small number of specialist solar panel recycling companies operating; this market is expected to grow along with the increased demand for solar power. Battery recycling will most likely be undertaken by the manufacturer or supplier and established recycling streams exist for packaging and other types	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		of waste to be generated. Overall, it is considered that the proposal complies with Policy 26.	
NNC 8.227	Minerals and Waste	The Green Hill BESS is located in an MSA on a site which has already been partially extracted. The rest of the BESS site is constrained by development, and it is considered that due to the constraints and small size, prior extraction is not practicable in this location.	The Applicant notes this comment.
NNC 8.228	Minerals and Waste	Green Hill F is located within an MSA for glacial and pre-glacial sand and gravel, to which access could be compromised for the life of the solar farm. The significance of any associated impacts is unknown, however the mineral planning authority considers that glacial sand and gravel deposits are of less economic interest than fluvial deposits found elsewhere in the county.	The Applicant notes this comment.
NNC 8.230	Minerals and Waste	The cable route connecting Green Hill E to the BESS potentially affects the active Earls Barton Quarry and Earls Barton Spinney Quarry. Extraction in Earls Barton Quarry is almost complete and due to end by August 2026. The route corridor includes all of the land within Earls Barton Spinney Quarry Phase 2a, which requires mineral extraction to be completed by June 2026. Provided the extraction in both sites progresses as planned, the mineral should have been removed by the time the cables are laid. In the event that extraction at Earls Barton Spinney Quarry is delayed, there is sufficient flexibility within the corridor to route the cable around unextracted mineral resources.	The Applicant notes this comment.
NNC 8.232	Minerals and Waste	As the proposal would safeguard access to and use of active and allocated sites it is considered consistent with Policy 29 of the Northamptonshire Minerals and Waste Local Plan.	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.234	Minerals and Waste	Embedded mitigation for Green Hill F would retain access to allocated mineral site M2 Strixton – Bozeat. The proposal has demonstrated that it would not adversely affect the continued operation of Earls Barton Quarry and Earls Barton Spinney Quarry and would not prejudice the use of site M2 Strixton – Bozeat and therefore complies with Policy 30 of the Northamptonshire Minerals and Waste Local Plan.	The Applicant notes this comment
NNC 8.235	Minerals and Waste	Summary Subject to implementation of the embedded and site-specific mitigation measures set out in the ES, the Minerals Planning Authority is satisfied that Policy 4 (Sites for the provision of sand and gravel), Policy 28 (Mineral Safeguarding Areas), Policy 26 (Sustainable design and use of resources), Policy 29 (Safeguarding minerals and waste related development from alternative uses), and Policy 30 (Preventing land use conflict) of the Minerals and Waste Local Plan would be satisfied and that the impacts of the proposal within Northamptonshire would be neutral.	The Applicant notes this comment.
NNC 8.241 to 8.242	Ground Conditions	Key Impacts The ES at APP-059 sets out embedded mitigation measures of how the proposal will deal with measures for the construction, operation and decommissioning phases with regard to ground contamination. The Council consider that Requirements securing the Construction Environmental Management Plan (CEMP) (REP1-146), the Decommissioning Environmental Management Plan (DEMP) (APP-547) and Operational Environmental Management Plan (OEMP) (APP-546) are secured to deal with any unexpected land contamination during the phases.	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		Subject to the proposed Requirements the proposal would be in general compliance with Policy 6 of the JCS (Development on Brownfield Land and Land Affected by Contamination) and the impact identified as neutral.	
NNC 8.243 to 8.246	Glint and Glare	Glint and Glare Paragraph 2.10.102 of NPS (EN-3) states that 'solar panels may reflect the sun's rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor'. Moreover, when a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels. There are no specific policies in the NPPF that refer to glint and glare. JCS Policy 8 requires development not to result in an unacceptable impact on amenity. To ensure quality of life and safer and healthier communities the JCS at Policy 8 (e) states that both new and existing development should be prevented from contributing to or being adversely affected by unacceptable levels of soil, air, light, water or noise pollution or land instability. JCS Policy 26 (d) requires that the siting of the development does not significantly adversely affect the amenity of existing or	The Applicant acknowledges this comment and notes that the quoted legislation and guidance is followed in **ES Chapter 15 Glint and Glare [APP-052].**

LIR Ref.	Topic Area	Summary	Applicant's Response
		proposed residential dwellings by reason of noise, odour intrusion, dust, traffic generation, visual impact or shadow flicker.	
NNC 8.250	Glint and Glare	Major National, National and Regional roads are predicted to have higher level of traffic compared to local roads and have higher sensitivity. Therefore, these roads that are within 1 km from the solar PV development boundary with a visual line of sight to the panels will be considered for the technical modelling. Green Hill Sites C, D, E lie within 1km of the A4500, A509 and Northampton Road (B573). NNC accepts that a high-level review indicates that there is no line of sight from the A509 and the proposed arrays. As such, the A509 would be qualitatively included in the assessment, but would not have to be included within the technical modelling. Based on a high-level review, there is a potential line of sight to the panels from A4500 and B573 road users such that glare modelling should be undertaken. Green Hill F lies within 1km of A509, and based on a high-level review, there is a potential line of sight to the panels from the A509 road users such that glare modelling should be undertaken.	The Applicant acknowledges this comment and notes that the A509 was assessed as shown in **ES Appendix 15.4 Green Hill F Ground-Based Receptor Results [APP-158].** The Applicant further notes that the A4500 and B573 were assessed as shown in **ES Appendix 15.3 Green Hill C, D, and E Ground-Based Receptor Results [APP-157].**
NNC 8.251	Glint and Glare	The ES at Chapter 15 Glint and Glare (APP-052) states that glare with 'potential for temporary after-image' was predicted from tracking panels within Green Hill Sites C, D and E. Green Hill D and E are towards the flight path. NNC accepts the findings that recommendations that additional mitigation are measures that are identified as being required to avoid, prevent, reduce or, if possible, offset significant effects that have been identified through the technical assessments within the ES. NNC accept the findings that, following a review of the modelling results, the Aviation Specialist confirmed that, based on their extensive real world experience of the effects of solar panels on aviation	The Applicant acknowledges this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		receptors, the modelled results would not result in a significant impact on the aviation receptors in practice.	
NNC 8.252	Glint and Glare	Therefore, such a large area of solar panels clearly has potential for glint and glare both during construction and operation of the PV solar Site areas. It is considered that these effects are likely to be short lived and, given the limited number of very close neighbours to the Sites, at some distance from anyone affected. It is noted that further assessment work has been requested and will be carried out in respect of implications for users of local roads. This additional work is supported. Overall NNC would expect the highest standards of mitigation in regard to glint and glare impacts to be suitably enforced. These are matters that we consider surmountable and that detailed Requirements will satisfy these matters in order to comply with JCS Policies 8 and 26 and the impact identified as neutral.	The Applicant acknowledges this comment and refers to the Applicant's response in comment above 'NNC 8.176'.
NNC 8.253 to 8.259	Noise and Vibration Air Quality	Noise, Vibration and Air Quality NPS (EN-1) states that proposals should demonstrate good design through selection of the quietest cost-effective plant available; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. The NPS also states that the SoS should not grant development consent unless it is satisfied that the proposals will meet the following aims: • Avoid significant adverse impacts on health and quality of life from noise. • Mitigate and minimise other adverse impacts on health and quality of life from noise.	In relation to air quality, **ES Chapter 16: Air Quality [APP-053]** has considered all phases of the Scheme (construction, operation/maintenance, and decommissioning) in terms of emissions to air for both human and ecological receptors. Effects have been assessed in accordance with best practice guidance and mitigation measures have been proposed where required. There are not predicted to be any breaches of any air quality limits as a result of the Scheme and all effects have been assessed as not significant. The assessment is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Where possible, contribute to improvements to health and quality of life through the effective management and control of noise Moreover the SoS should consider if mitigation methods needed for construction and operational noise over and above any which may form part of the project application. The mitigation methods may include: • Engineering: reduction of noise at point of generation and containment of noise generated. • Lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural barriers, or other buildings. • Administrative: restricting activities allowed on the site; specifying acceptable noise limits; and taking into account seasonality of wildlife in nearby designated sites NPS (EN-1) states that the SoS 'should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area or leads to a new area where air quality breaches any national air quality limits'. In all cases the SoS must take account of any relevant statutory air quality limits. Section 15 of the NPPF refers to conserving and enhancing the natural environment. Paragraph 187 (e) states, "preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to	the Scheme and nearby existing sensitive receptors. Noise and vibration predictions and subsequent assessments of impacts have been carried out in accordance with current policy and guidance, and the methodology discussed and agreed with all relevant statutory bodies. In respect to construction, operational and decommissioning noise, the assessment results predict that noise and vibration levels from the Scheme are predicted to be an indication of a Moderate/ Minor effect and **not significant.**

LIR Ref.	Topic Area	Summary	Applicant's Response
		improve local environmental conditions such as air and water quality". Paragraph 199 of the NPPF requires planning policies and decisions, "sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas". JCS Policy 8 requires development not to result in an unacceptable impact on amenity. To ensure quality of life and safer and healthier communities the JCS at Policy 8 (e) (i) requires development not to have an unacceptable impact on amenities by reason of pollution, whilst Policy 8 (e) (ii) goes further by stating that both new and existing development should be prevented from contributing to or being adversely affected by unacceptable levels of soil, air, light, water or noise pollution or land instability. JCS Policy 26 (d) requires that the siting of the development does not significantly adversely affect the amenity of existing or proposed residential dwellings by reason of noise, odour intrusion, dust, traffic generation, visual impact or shadow flicker whereas (g) requires that the development does not create a significant adverse cumulative noise or visual impact when considered in conjunction with other developments planned within North Northamptonshire and adjoining local authority areas.	
NNC 8.260	Noise and Vibration	Key Impacts	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
	Air Quality	The Nuisance Statement (APP-558) considered the whole project from construction to decommissioning and each potential source of nuisance has had a suggested mitigation. NNC accepts that the construction, operation (and maintenance), and decommissioning phases of the project will not give rise to impacts from the site condition which would constitute a statutory nuisance under section 79(1) (a) or (e) of the Environmental Protection Act 1990.	
NNC 8.261 to 8.226	Air Quality	Air Quality The Construction Dust Management Plans within the Nuisance Statement (APP-558) adopts good site practice on controlling dust outlined within the IAQM's 'Guidance on the assessment of Dust from Demolition and Construction' document for high-risk sites. These measures represent good industry practice and are therefore embedded within the Scheme design. The report concludes that the potential risk of human health impacts is low for construction dust and once the construction has been completed, there will be no dust from the completed development, also the traffic flows would be below the traffic increase thresholds criteria in the EPUK/IAQM guidance to cause a significant air quality effect, effects from construction vehicles emissions on local air quality are not significant, which NNC accept. The ES at Appendix 16.1 Construction Dust Methodology (APP-166) has been reviewed. NNC accepts the findings that the undertaking of activities such as demolition, excavation, groundwork, cutting, construction and storage of materials has the potential to result in fugitive dust emissions throughout the construction phase. Vehicle movements both on site and on the	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		local road network also have the potential to result in the re-suspension of dust from highway surfaces. The potential dust emission magnitude for construction is considered to be large for the Earth works, Construction and Track out. NNC accepts the recommended mitigating measures outlined in Table 14 of this document.	
NNC 8.263	Noise and Vibration	Noise and Vibration APP-558 report states that the noise levels from the construction activities along the cable route are below background levels at all receptors except BESS002 and BESS003 where construction noise is above background levels but below the BS5228 threshold. The construction noise is therefore predicted to be Negligible at all receptors except for BESS002 and BESS003 where it is predicted to be a Low magnitude of impact. This is an indication of Moderate/Minor and Moderate effects and not significant. NNC accepts the Best Practicable Means (BPM) included within the Outline CEMP (APP-545) and Outline Decommissioning Statement (APP-547).	The Applicant notes this comment.
NNC 8.264 to 8.226	Noise and Vibration	With regard to the operation, APP-558 report states that the worst-case scenario was used in the assessment criteria. NNC accepts the suggested design of development layout and the following mitigating measures to ensure that no significant noise effects are experienced at the nearest sensitive receptors: Where possible, the distance from the nearest residential receptors to the substation and energy storage facility and onsite transformers and inverters has been maximised. • Where possible, noise-emitting equipment has been placed away from sensitive receptors.	The Applicant notes this comment. The **ES Addendum Chapter 14 Noise and Vibration [REP1-168]** includes further clarifications for the noise data used for the Battery Energy Storage Systems (BESS) operational noise assessment, which has been used to validate the assessment in the chapter. Requirement 17 in Schedule 2 to the **Draft DCO Revision A [REP1-008]** requires an operational noise management plan confirming how the

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Where practical, quieter items of plant have been selected. • Where required, manufacturer-supplied noise mitigation will be installed. • Where required, noise generating equipment will be enclosed / containerised; and • Where required, louvres and/or acoustic barriers will be included around inverters and BESS cooling fans. NNC would recommend a Requirement regarding prior to commencement of the development a noise assessment for the BESS be submitted for approval by the local planning authority. NNC accepts the comments of the operational phase programme of equipment replacement in terms of the working times.	design of the BESS has incorporated the operational noise mitigation measures set out in the **OOEMP [REP1-133],** to be approved by the relevant planning authority prior to the commencement of the BESS.
NNC 8.267	Noise and Vibration	The noise and vibration assessment (APP-051) is comprehensive considering all potential sources of noise from construction to decommissioning and NNC accepts the findings that in terms of noise and vibrations, the impact on the nearby sensitive receptors was Moderate/Minor or Neutral adverse effect, which is not significant.	The Applicant notes this comment.
NNC 8.268 to 8.269	Noise and Vibration	On review of the Outline Operational Environmental Plan, (APP-546) NNC accepts the findings that Sites will generally be unmanned during normal operation. Routine maintenance would be carried out as required Monday to Friday 07:00 – 18:00. Emergency maintenance would be carried out as and when needed. It is noted that activities for the replacement of onsite infrastructure will be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays, which constitute the	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		core working hours (excluding start-up and shut down works). However, some activities may be required outside of these times, such as for the delivery of abnormal loads. NNC recommends that the Applicant informs the Environmental Health department prior to these planned activities that need doing outside the above-mentioned times. It is noted that no on-site infrastructure replacement activities will take place on Bank Holidays and Public Holidays. NNC accepts the recommendations that: Replacement infrastructure deliveries by HGV will arrive between 09:30-16:30 where practicable. They will be coordinated to avoid HGV movements during the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00). In addition, worker shift patterns will be coordinated to avoid travel during the network peak hours of 08:00-09:00 and 17:00-18:00.	
NNC 8.270	Noise and Vibration	Overall NNC does not envisage any impacts on air quality, noise and vibration that cannot be adequately controlled, and thus this is an issue of minimal 64 concern and neutral impact. The development complies with local policy 8 (e) (i) and (ii) of the JCS.	The Applicant notes this comment.
NNC 8.271 to 8.276	Climate Change	Climate change Section 4.10 of NPS EN-1 addresses climate change adaptation in energy infrastructure development. It notes that the decision maker should take the effects of climate change into account when developing and consenting infrastructure, referring also to the potential long-term impact of climate change. EN-1 focuses on climate change adaptation and reiterates the need to minimise the most dangerous impacts of climate change.	The Green Hill Scheme aligns with the requirements of NPS EN-1 by incorporating climate change adaptation measures into the development. The **ES Chapter 16 Air Quality [APP-044]** details the embedded mitigation measures (section 7.7) and outlines an assessment of the potential impacts of climate change on the Scheme (see section 7.8). The assessment highlights the design measures and

LIR Ref.	Topic Area	Summary	Applicant's Response
		NPS (EN-3) requires the Applicant to consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although Applicants may seek consent without a time-period or for differing time-periods of operation. The NPPF at Section 14 highlights the importance of integrating climate change considerations into the planning system by promoting for development that reduces greenhouse gas emissions and enhances resilience against future climate risks. Paragraph 168 states that when determining applications for renewable and low carbon energy developments, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future. The North Northamptonshire Climate Change Strategy (February 2025) outlines a plan to make the region more resilient and sustainable, aiming for Net Zero emissions by 2050 and becoming a carbon-neutral council by 2030. Key aspects include focusing on emissions reduction, climate resilience, and a "just transition" for a greener economy, supported by public and private funding and partnerships. Policy 26 of the JCS supports renewable and low carbon energy where it can be demonstrated that the proposal meets all of the policy's criteria.	best practice methodologies to mitigate the risk of Climate Change on the Scheme. The **ES Chapter 7 Climate Change [APP-044]** in paragraph 7.5.15 explains the replacement of the panels has been considered 30 years for the purpose of the assessment, in line with EN-3. Additionally, the paragraph explains the panel efficiency and degradation considered over time (2% degradation in the first year and 0.45% for every additional year). The assessment in the **ES Chapter 7 Climate Change [APP-044]** section 7.8 concludes the Scheme will reduce greenhouse gas emissions compared to a scenario without the Scheme. The Scheme supports the North Northamptonshire Climate Change Strategy by promoting renewable energy and contributing Net Zero.
NNC 8.277	Climate Change	Key Impacts	The assessment in the **ES Chapter 7 Climate Change [APP-044]** is supported by recognized methodologies as described in Section 7.4. In

LIR Ref.	Topic Area	Summary	Applicant's Response
to 8.279		The Applicant's assessment (APP-044) includes detailed methodologies for identifying effects related to the construction, operation and decommissioning phases. Greenhouse Gas (GHG) emissions sources considered during the construction phase include the embodied carbon of products and equipment, the transportation of these materials to the Order limits boundary, as well as the emissions associated with construction worker transport to the Sites. It is noted that the scheme has a potentially positive impact on climate change as renewable energy does not directly use fossil fuels to generate electricity and consequently does not add to greenhouse gas emissions at the point of generation. ES Chapter 7, Climate Change (APP-044) concludes that the Scheme incorporates embedded GHG mitigation measures that prioritise the 65 use of low-carbon design materials and construction practices and that no additional mitigation measures are required for Climate Change based on the conclusions of the assessments carried out. NNC agree that the Applicant's approach and assumptions for capturing and calculating emissions utilise recognisable methodology and are therefore acceptable, and that the approach has recognised the requirements for whole life emissions calculations (relative) to cover pre-construction, construction phase, life time (including operational and maintenance) and decommissioning. NNC's position is therefore that, adopting a 'whole life' approach to GHG emissions, the impact is positive overall, however there are differing considerations in relation to the sub elements of the assessment	Section 7.8, the assessment concludes that the Scheme has a beneficial and significant impact on climate change as it will reduce greenhouse gas emissions compared to a scenario without the Scheme. This is inclusive of a comparison with other energy generating technologies.

LIR Ref.	Topic Area	Summary	Applicant's Response
		as discussed in various sections within this LIR. The Scheme, at a high level broadly complies with policy 26 of the JCS.	
NNC 8.285 to 8.286	Public Amenity and Recreation	In regard to the control of light, the Outline Construction Environmental Management Plan has been reviewed (REP1-146). NNC accepts the recommendation in this report that lighting will be required during construction for safety reasons but will be temporary in nature and predominately limited to the core working hours. Temporary lighting will be required in areas where natural lighting is unable to reach (such as sheltered/confined areas) and during core working hours within winter months. Whilst the type of lighting to be used for construction activities has not been confirmed yet, the following principles will be adhered to: • Use of focused directional fittings to minimise outward light spill and glare (e.g., hoods/ cowls which direct light below downwards) outside of the Sites; and • Lighting to be directed towards the middle of the Sites rather than towards the boundaries. NNC recommends that a report be submitted for approval via a Requirement to show the type of lighting to be used and to demonstrate that the lighting will adhere to the two points mentioned above.	A Lighting Design Strategy will be provided as part of the Detailed Construction Environmental Management Plan and Operational Environmental Management Plan as secured by Requirements 13 and 14 of **Draft DCO Revision A [REP1--008]**.
NNC 8.288	Public Amenity and Recreation	With regard to community benefits, the proposed Requirement setting up a Community Liaison Group (CLG) is supported. It is noted that the purpose of the group is to enable local community representatives to have a formal channel for monitoring and influencing the construction, operational and decommissioning aspects of the Scheme. Furthermore, the CLG is intended to	Please refer to the Applicant's response to comment 'NNC-085' in **The Applicant's Responses to Relevant Representations [REP1-161].**

LIR Ref.	Topic Area	Summary	Applicant's Response
		provide an opportunity for regular and formal dialogue between the Applicant and the local community's representatives in relation to the construction and operational aspects of the Scheme. NNC notes that a Community Benefit Fund (CBF) is also proposed, however the submission documents state that the CBF does not form part of the DCO application, and this funding (to fund local community projects) is not required to mitigate the impacts of the Scheme. NNC consider that a CBF is required to mitigate the impacts of the development and should be secured as part of the DCO process. A CBF can be managed by the CLG and can assist in delivering lasting benefits to the local community, such as improving more local landscape buffers outside of the Sites boundaries but in close proximity to villages, to enable education opportunities within local schools regarding renewable energy, support local sustainability/ecological programs etc. NNC are keen to explore the CBF, what it could provide and how it can be secured during the life of the development.	
NNC 8.290	Public Amenity and Recreation	NNC are also keen to ensure that during the decommissioning stage, suitable funding is secured (eg a sinking fund or bond) to secure remediation of the Sites. There is also the matter of funding (and if the owner sold the project or the owner went into liquidation prior to decommissioning). NNC consider that this must be considered and secured throughout the DCO examination process. Overall, it is considered that the Scheme is in conflict with local policy 8 (e) and 26 of the JCS and the impact identified as adverse.	Please refer to the Applicant's response to comment 'NNC-085' in **The Applicant's Responses to Relevant Representations [REP1-161].**

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.291 to 8.294	Socio-Economics	Socio-Economic Paragraph 5.13.9 of the NPS (EN-1) states that the SoS 'should have regard to the potential socio-economic impacts of new energy infrastructure identified by the Applicant and from any other sources that the SoS considers to be both relevant and important to its decision'. The NPS goes on to say the SoS 'should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development'. (Paragraph 5.13.8). Section 12 of the NPPF states, "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience" (paragraph 135 (f)). Section 8 Promoting healthy and safe communities, paragraph 96 sets out that, 'planning policies and decisions should aim to achieve healthy, inclusive and safe places'. 8.294 Section 17 of the Crime and Disorder Act 1998 details the need for the council to do all that it reasonably can to prevent, crime and disorder in its area. The JCS at policy 8 (e) (iv) sets out the policy requirement for new development to seek to design out crime and disorder and reduce the fear of crime. The adopted designing out crime supplementary planning guidance gives detailed advice this issue.	The Applicant notes these comments and confirms the Scheme has been assessed in respect of national policy and legislation with respect to socio-economic impacts.
NNC 8.295 to 8.298	Socio-Economics	Key Impacts The Scheme has been considered in assessing the socio-economic and land use impacts and effects of the Scheme, whilst considering the embedded mitigation measures which are	The Applicant confirms that this reflects the assessment findings in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]**

LIR Ref.	Topic Area	Summary	Applicant's Response
		relevant to this chapter (APP-054) and have already been incorporated into the Scheme design, in addition to additional mitigation measures. It is agreed that the Scheme is likely to have impacts on socio-economic receptors at local level. In regard to tourism, it is agreed that the proposal would have a limited and therefore neutral impact on tourism in the local area. In terms of employment, it is accepted that there would be a positive multiplier effect to the local area, generated by indirect and induced effects of the construction activity. Given the specialist nature of both the temporary and permanent jobs, opportunities, including local upskilling should be maximised to ensure positive, long-term local employment gain to support the local economy. In regard to the embedded mitigation measures proposed (section 17.7 of APP 054), NNC agree that these measures can be secured through Requirements.	and the intention of the mitigation measures set out therein. The Applicant confirms that measures to enhance local employment, and to promote local skills and suppliers are secured through the **OSSCEP [APP-554]**, which itself is secured through Requirement 20 of Schedule 2 to the **Draft DCO Revision A [REP1-008]**.
NNC 8.299 to 8.300	Socio-Economics	Chapter 17 of the ES (APP-054) lightly touches on security and crime mitigation measures. However, any new development on a green field site will provide opportunities for crime and there should be recognition of this. We would expect to see how the potential for crime will be addressed with details of the crime prevention measures to be employed across the site. The Applicant should be able to illustrate a layered approach to the site's security when detailing the mitigation measures. It is agreed that such security prevention measures can be dealt with via Requirement and would therefore be in compliance with policy 8 (e) (iv) of the JCS and the identified impact as neutral.	The Applicant confirms that crime prevention measures have been described in an outline manner for the DCO application stage, with full details of site security and crime prevention measures secured through Requirements 5 (Detailed design approval), 10 (Fencing and other means of enclosure), and 13 (Construction environmental management plan) of Schedule 2 to the **Draft DCO Revision A [REP1-008]**.

4 The Applicant's Responses to West Northamptonshire Council Local Impact Report

Table 4: Applicant's Response to [REP1-175]

LIR Ref.	Topic Area	Summary	Applicant's Response
WNC 1.1 to 1.5	Introduction	The content of this section has not been copied across from the original submission document.	The Applicant notes the contents of this section of the LIR prepared by WNC and does not wish to provide additional comment at this stage.
WNC 4.15 to 4.19	Landscape and Visual Impacts: Baseline Analysis – Landscape Character	The landscape of West Northamptonshire is defined by the broad and elevated Clay Plateau, specifically the 5b Sywell Plateau Landscape Character Area (LCA). This forms part of a gently undulating upland extending between the Nene Valley to the south and the lower clay vales to the north. The landform is generally level with subtle variations but falls away more noticeably along the valley edges and towards minor watercourses, affording wide and often uninterrupted views across the surrounding countryside. The area has a simple, open and expansive rural character. Arable farming predominates, with large rectilinear fields bounded by clipped hawthorn hedgerows and occasional hedgerow oaks or ash trees. Tree cover is limited, typically confined to hedgerow trees, small copses and narrow belts associated with roads or settlement fringes. The overall impression is of a large-scale, open agricultural landscape with broad horizons and minimal topographic or vegetative containment. Settlements are typically small, compact villages of historic origin such as Walgrave, Old, Holcot and Moulton, located on slightly elevated ground where churches, rooflines and farm buildings form recognisable local landmarks. These	The Applicant notes these comments.

LIR Ref.	Topic Area	Summary	Applicant's Response
		villages are separated by wide tracts of open farmland that maintain their individual identity and sense of rural isolation. Farmsteads and rural lanes connect the settlements, with winding enclosures and hedgerow boundaries defining a fine-grained pattern within an otherwise open plateau. The plateau supports a strong sense of place derived from its open horizons, absence of large-scale modern development, and perceptual qualities of calmness and rural tranquillity. Views can be far-reaching, with the spires and rooftops of villages, informing the skyline and reinforcing the visual relationship between settlements and their surrounding farmland. These inter-settlement views, together with undeveloped skylines and the legibility of the historic settlement pattern, are key components of local landscape character. Perceptually, the Sywell Plateau is valued for its rural simplicity, openness and separation between settlements. The large field scale and limited screening vegetation increase its visual exposure, while the landscape's coherent agricultural structure and strong settlement setting define its distinctive and recognisable character. The introduction of renewable energy infrastructure would contrast with the established rural grain, potentially eroding the perception of openness and tranquillity that characterises this part of the plateau.	
WNC 4.20 to 4.25	Landscape and Visual Impacts: Baseline Analysis – Visual Environment	The visual environment of this part of West Northamptonshire is characterised by broad horizons, long sightlines and a high degree of intervisibility between the plateau farmland and surrounding villages. These qualities	The Applicant notes these comments.

LIR Ref.	Topic Area	Summary	Applicant's Response
		contribute to the area's rural identity and to the perception of openness that defines the Sywell Plateau. Walgrave is the largest nearby settlement and occupies a slightly elevated position on the plateau. Properties along Kettering Road and the northern edge of the village overlook open arable fields extending eastwards, providing clear and uninterrupted views across the surrounding countryside. These open vistas form an important part of the village's rural setting and help to maintain its visual connection with the wider agricultural landscape. The smaller villages of Old and Holcot share similar characteristics, each set within gently rolling farmland with compact historic cores and open edges. Hedgerows and trees on the outer boundaries of these villages provide intermittent screening, though gaps and undulations in the landform allow expansive views across surrounding fields. These views reinforce the sense of separation between settlements and the openness of the plateau landscape. The road network plays a prominent role in the way the landscape is experienced. Newland Road, Kettering Road, Boughton Road and the A43 all traverse or border areas of open farmland, affording views across arable fields and towards settlement skylines. The experience of travelling along these routes is defined by a mix of enclosed and open views and the rhythm of hedgerows and field boundaries. A network of PRoWs, including NN/DF/004, NN/DT/008 and NN/CW/001, cross the surrounding farmland, providing access between settlements and across the plateau. These	

LIR Ref.	Topic Area	Summary	Applicant's Response
		routes are typically enclosed by hedgerows at lower elevations but become more open and exposed as they rise to higher ground. People using these paths experience views across arable land, with open skies and long horizons forming a key part of the visual experience. The PRoWs contribute to both recreational amenity and the public appreciation of the local landscape. Overall, the visual environment in this part of West Northamptonshire is shaped by the openness of the Sywell Plateau, the limited presence of screening vegetation, and the strong visual relationships between farmland and settlements. These characteristics create the potential for changes in land use or new development to be visible from a wide range of receptors, including settlement edges, road corridors and PRoWs, and to influence the perceived openness and rural quality of the landscape.	
WNC 4.26 to 4.28	Landscape and Visual Impacts: Development Landscape Proposals	The Green Hill Solar Farm includes three development parcels within West Northamptonshire, identified as Site A, Site A.2 and Site B. The proposals incorporate solar PV arrays, associated access tracks, inverters and substations, with an operational period of 60 years. The design integrates a suite of landscape and ecological measures intended to reduce visual effects, reinforce local landscape structure and deliver biodiversity enhancement. Across all three parcels, the plans include a palette of mitigation planting and habitat types, comprising:	The Applicant notes these comments. The Applicant notes this comment. Please also refer to the updated **OLEMP Revision A [REP1-137]** submitted at Deadline 1.

LIR Ref.	Topic Area	Summary	Applicant's Response
		• Reinforcement and creation of native hedgerows to strengthen field boundaries and enhance landscape structure. • Woodland and scrub planting located along outer boundaries, road corridors and more open edges. • Species-rich grassland and meadow creation beneath and between arrays. • Tussock and damp grassland margins, intended to increase ecological diversity. • Ground-nesting bird mitigation areas including continued arable management and wader scrape clusters. • Retention of existing vegetation wherever practicable, with selective removal only where necessary for access or construction. Management and maintenance is set out in the Outline Landscape and Ecological Management Plan (OLEMP) (Document reference: APP-548) which sets out establishment, aftercare and long-term maintenance principles for the operational lifespan of the development.	
WNC 4.29 to 4.33	Landscape and Visual Impacts: Summary of Impacts	The Environmental Statement (ES) Landscape and Visual Chapter (Document reference: APP-045) has considered the likely landscape and visual impacts and effects arising from the Scheme, taking into account both embedded mitigation measures that have been incorporated into the design and any additional mitigation proposed to further reduce residual effects. The assessment follows the	The Applicant notes these comments. The **ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]** has undertaken a robust assessment of the sensitivity (nature of the receptor) of landscape and visual receptors.

LIR Ref.	Topic Area	Summary	Applicant's Response
		methodology set out in the Landscape and Visual Chapter, which is based on the principles of GLVIA3 and informed by relevant technical guidance and professional standards, which is welcomed. The assessment approach, including the identification of representative receptors, the methodology for evaluating sensitivity and magnitude of change, and the scope and form of mitigation, was developed and refined through ongoing pre-submission consultation between ourselves and the Applicant's landscape and EIA teams. In line with GLVIA3, the ES Landscape and Visual Chapter assesses two types of effects; landscape effects and visual effects, across the Construction, Operational and Decommissioning stages of the Scheme. • Assessment of landscape effects: assessing effects on the landscape as a resource in its own right • Assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people Given the dispersed nature of the Scheme, it was agreed that landscape receptors would be based on study areas, drawing on character assessments at national, regional and local scales. To ensure a clear and proportionate approach, the key characteristics and qualities of relevant landscape areas were reviewed and consolidated for each site area and for the Scheme as a whole. This has provided a framework for assessing effects across the dispersed site	The judgement on landscape sensitivity is based on consideration of both the landscape receptor's value and its susceptibility to change arising from the Scheme. Details on how landscape value and susceptibility have been assessed are set out within the **ES Appendix 8.1: LVIA Methodology [APP-078]**. **ES Appendix 8.3 Revision A [REP1-041]** sets out an assessment of the Value, Susceptibility and Sensitivity for Landscape Character for each of the individual Sites within the Scheme within each of the 3 Study Areas. This approach has allowed for the individual characteristics and local variation that are present within the landscape in and around each of the individual Sites to be fully accounted for within the assessment of Landscape Sensitivity.

LIR Ref.	Topic Area	Summary	Applicant's Response
		parcels while maintaining appropriate reference to established character typologies and local distinctiveness. While this approach has ensured consistency across the scheme, it is important that the assessment reflects local variation and the differing levels of sensitivity within and between the identified landscape areas, particularly where enclosure, tranquillity, or settlement setting are key defining characteristics.	
WNC 4.34 to 4.41	Landscape and Visual Impacts: Summary of Impacts – Construction	Construction activities across the three parcels within West Northamptonshire will include the delivery and installation of solar PV panels, internal access tracks, inverter and substation infrastructure, and perimeter fencing, together with associated earthworks, drainage features and temporary site compounds. Construction is anticipated to take place over a prolonged period, extending for up to 24 months, and will likely be phased across different parcels to coordinate with access, grid connection and seasonal working constraints. The ES (Document reference: APP-045) identifies that the construction process will introduce a range of temporary but perceptible changes within the local landscape. These include the presence of construction equipment, security fencing, temporary lighting, access routes, and stockpiling of materials. These activities will generate visual disturbance, loss of tranquillity and changes to the experiential qualities of the surrounding countryside. For landscape, the ES concludes that effects during construction would range from 'moderate/minor neutral' on landscape fabric and moderate adverse (significant) on the	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		local study area (landscape character). The effects are described as being localised to the site and its immediate surroundings and would diminish rapidly once the construction period ends. This conclusion is considered reasonable, given the temporary nature of the works and the relatively limited extent of permanent ground disturbance within each site. For visual receptors, the ES identifies that effects during the construction period are likely to be noticeable. In particular, residential properties on the northern and eastern edges of Walgrave, together with those along Kettering Road, will have open or partially screened views of site activity. Users of local routes, including Boughton Road, Kettering Road (VP45), Newland Road (VP5) and the A43, are also predicted to experience intermittent and sequential visibility of construction works, particularly where the road corridors adjoin or overlook development parcels. The ES assesses construction effects at a number of these visual receptors viewpoints ranging between moderate and major adverse (significant). PRoWs such as NN/DF/4, NN/DT/9#1 and NN/CW/1 traverse or pass in close proximity to the development parcels, meaning users are likely to experience noticeable disruption. Construction compounds, fencing and machinery will be visible at close range from some sections of these routes. Although these effects are temporary, the construction period will extend over a considerable duration and will represent a prolonged phase of noticeable change in both	

LIR Ref.	Topic Area	Summary	Applicant's Response
		landscape and visual terms. The extended timescale means that construction impacts, while temporary, are still a material consideration in assessing the overall local impact of the development. In summary, the Council agrees that construction will result in significant but temporary adverse landscape and visual effects.	
WNC 4.42 to 4.49	Landscape and Visual Impacts: Summary of Impacts – Operation	The Applicant states that the impact on landscape fabric across all sites will be beneficial, primarily as a result of the extent of new landscape and habitat features proposed, including hedgerows, woodland planting and grassland creation. While these measures would introduce positive elements that contribute to biodiversity and local landscape structure, they must also be considered alongside the physical changes associated with the development itself. The introduction of access tracks, fencing, substations and other infrastructure will result in the permanent alteration of land use and surface character, although the underlying field pattern will only be modified in limited areas where new hedgerows, riparian corridors or woodland planting are proposed beyond the existing arrangement. The change from an open and productive agricultural landscape to one influenced by renewable energy infrastructure represents a material shift in how the landscape is used. Although the proposed planting will, over time, help to soften and partially offset these effects, the overall change in land use will remain a defining and long term characteristic of the sites.	The Applicant notes this comment. At Decommissioning, all infrastructure above ground is to be removed and the Sites returned to their existing condition. As such the LIR is incorrect in its assertion that *"access tracks, fencing, substations and other infrastructure will result in the permanent alteration of land use and surface character"*. It is, however, recognised that the impact is a long term one. Following decommissioning of the Scheme, control of the hedgerow management would no longer be enforced through the **OLEMP Revision A [REP1-137]** allowing landowners to manage the heights as under current practice. As such whilst the LVIA acknowledges the change in character to the landscape as a consequence of the change in hedgerow heights, this change would not necessarily be permanent and is likely to be limited to the lifetime of the Scheme.

LIR Ref.	Topic Area	Summary	Applicant's Response
		The ES (Document reference: APP-045) and Assessment tables (APP-081) state that at Year 1, when planting is newly established and provides limited visual screening, the solar infrastructure will be perceptible within the local landscape. For landscape character, effects are assessed as Moderate Adverse at Year 1 (1km Study Area). The ES anticipates that as mitigation planting and habitat features mature, the magnitude of change will reduce, resulting in Minor Adverse residual effects (1km Study Area) by Year 15. For visual receptors, the ES records significant operational effects at Year 1, reflecting the limited maturity of mitigation planting and the exposed nature of the Sywell Plateau. The most affected receptor groups include: • Residents on the northern and eastern edges of Walgrave who currently experience open views across farmland. The introduction of solar infrastructure will alter the outlook from these properties, particularly along Kettering Road, where the arrays and fencing will be visible in foreground views. • Road users travelling along Newland Road, Kettering Road, Boughton Road and the A43, where the dispersed nature of the parcels will result in sequential and intermittent views of the development. These routes traverse open countryside with little screening, and the infrastructure will be perceptible above hedgerow height until vegetation establishes. • PRoWs, notably NN/DF/004, NN/DT/008 and NN/CW/001, which either cross or pass adjacent to the	

LIR Ref.	Topic Area	Summary	Applicant's Response
		development parcels. Walkers and riders will experience extended views of the solar panels, fencing and internal tracks, particularly where the paths cross open ground. By Year 15, the ES concludes that residual visual effects will generally reduce to Minor Adverse. Professional judgement supports this broad conclusion but notes that at more elevated and open locations, including parts of NN/DF/4, mitigation is unlikely to achieve full visual containment. In these locations, residual effects are likely to remain at Moderate/Minor Adverse, reflecting the continued perceptibility of infrastructure elements within the rural countryside. From a landscape perspective, the mitigation proposed would assist in reinforcing and enhancing the local landscape structure through new hedgerows, woodland edges and grassland habitats. However, as clarified in the Landscape Institute Technical Guidance Note LITGN-2024-01 Notes and Clarifications on Aspects of GLVIA3 (August 2024), care should be taken to ensure that landscape and visual mitigation are not conflated. Screening the development from view may reduce its visual effects but does not necessarily lessen its landscape effects, such as those on landscape character. In addition, it is important that the terms mitigation and enhancement are used correctly. Mitigation should focus on measures that prevent, reduce or where possible offset significant adverse effects, whereas enhancement seeks to improve landscape or visual amenity beyond the baseline condition.	

LIR Ref.	Topic Area	Summary	Applicant's Response
		In this context, while the proposed planting and habitat creation would deliver some enhancement relative to existing conditions, they primarily function as mitigation intended to reduce the degree of adverse change arising from the development. It is also acknowledged that the perceptual qualities and sense of place associated with the open, tranquil and rural character of the Sywell Plateau will remain altered for the duration of the operational period. Although the vegetation framework will integrate the development more successfully over time, the underlying change from a traditional agricultural rural landscape to one more defined by infrastructure will continue to influence how the area is perceived and experienced. The longevity of the Scheme, anticipated to operate for up to 60 years, introduces an extended temporal period that goes beyond the timeframe typically associated with temporary development. While decommissioning and land restoration are proposed post 2091, the duration of the operational period represents a substantial proportion of a lifetime and at least one full generation. As such, the resulting change in landscape character and experience will be long term and effectively permanent for those living within and around the affected area. The ES assessment appropriately identifies Year 15 as the point at which mitigation is expected to reach maturity, providing a benchmark for long term residual effects. However, it is important to recognise that the period between Year 15 and decommissioning constitutes the majority of the Scheme's lifespan, during which the identified adverse effects, though reduced by mitigation, will continue.	

LIR Ref.	Topic Area	Summary	Applicant's Response
		It's also worth noting that the proposed establishment of new hedgerows along site boundaries, with a target height of approximately 4 to 4.5 metres, is intended to provide visual screening of the solar infrastructure and to assist in integrating the development within the surrounding landscape. While this approach would help to reduce the visual prominence of the arrays in near and mid-distance views, it would also increase the degree of enclosure and could lead to a noticeable change in local landscape character. In areas that are currently open or semi open, the introduction of taller, continuous hedgerows may diminish existing visual connections across the countryside and erode the perception of rural openness.	
WNC 4.50 to 4.54	Landscape and Visual Impacts: Summary of Impacts – Decommissioning	Decommissioning of the Green Hill Solar Farm is expected to occur after the 60-year operational period and would involve the removal of all above-ground infrastructure, internal access tracks and fencing, together with reinstatement of the land to agricultural use. Temporary compounds and plant would be established to facilitate the works, with activities anticipated to be of shorter duration and lower intensity than during construction. The decommissioning process would result in short-term, temporary effects on landscape character and visual amenity due to the presence of machinery, vehicle movements and localised ground disturbance. These effects would be noticeable from nearby settlements, road corridors such as Kettering Road, Boughton Road, Newland Road and the A43, as well as from adjacent PRoWs.	The Applicant notes this comment. Requirement 21 of Schedule 2 to the **Draft DCO Revision A [REP1-008]** requires the Scheme to be decommissioned in accordance with a decommissioning plan, which must be substantially in accordance with the **ODS Revision A [REP1-135]**, and will be updated to reflect environmental requirements at that time. The detailed decommissioning plan must be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. It states in the **ODS Revision A [REP1-135]** that the trees should be protected, conserving landscape and biodiversity features. Once decommissioned, the land in the Scheme will be returned to the

LIR Ref.	Topic Area	Summary	Applicant's Response
		Following decommissioning, the removal of infrastructure will enable the land to be restored to agricultural use, reinstating the rural landscape character and the sense of openness across the site parcels. By this stage, the landscape framework will have benefitted from substantial hedgerow reinforcement, new woodland planting and habitat creation, leading to a more mature and ecologically diverse landscape than at the point of construction. These improvements would represent a long-term beneficial outcome for landscape fabric and structure, enhancing connectivity and overall resilience. That said, the post-decommissioning phase will still rely on the continuation of appropriate management and maintenance to ensure that these benefits are sustained. Without a clear management framework in place, there is potential for the landscape to degrade or become unmanaged, leading to loss of structure, encroachment by scrub, and a gradual decline in landscape quality. It will therefore be important that a Decommissioning and Aftercare Plan is secured to guide restoration, management and monitoring of the landscape once infrastructure has been removed. However, it is also recognised that decommissioning is expected to occur after approximately 60 years, and that over such a long timeframe, a wide range of policy, land management practices, and climatic conditions could change. While an Aftercare Plan would provide an appropriate framework in principle, its detailed content and delivery mechanisms will inevitably need to be reviewed and updated closer to the time of decommissioning, to	landowners who will be able to recommence the existing agricultural activity.

LIR Ref.	Topic Area	Summary	Applicant's Response
		ensure alignment with future environmental standards, agricultural practices, and policy priorities.	
WNC 4.55 to 4.58	Landscape and Visual Impacts: Summary of Impacts – Combined Site Effects (Cumulative)	The Environmental Statement (ES) includes an assessment of cumulative landscape and visual effects arising from the Green Hill Solar Farm as a whole and in combination with other existing or proposed energy and infrastructure developments within the wider area. The dispersed layout of the solar parcels, extending across both West and North Northamptonshire, as well part of Milton Keynes means that the combined influence of multiple sites will contribute to a broader pattern of cumulative change across the countryside. Within West Northamptonshire, cumulative effects relate primarily to Sites A, A.2 and B, all located on the Sywell Plateau between Walgrave, Old, Holcot and Moulton. When considered together, these parcels introduce a repeating pattern of solar infrastructure across the landscape. Travelling along local road corridors, including Newland Road, Kettering Road, Boughton Road and the A43, users will experience sequential and intermittent views of the development. The ES Chapter 8 (paragraph 8.9.3) states that "In reaching the overall assessment of effects associated with the Scheme, the cumulative effects of each of the Sites and Cable Route Corridor are assessed and combined to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme." While this approach is technically correct in methodological terms, there is a reasonable argument that the magnitude of change on the	Although the Scheme comprises a series of independent areas of land or Sites, they are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road infrastructure aiding integration and dispersion across the landscape than if the site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.

LIR Ref.	Topic Area	Summary	Applicant's Response
		landscape, when considered across the full geographical extent of the Scheme rather than at the level of individual parcels, would be greater given the scale and area involved. Consequently, it follows that the overall significance of effect, particularly in relation to landscape character, would also be greater if the Scheme is viewed and experienced as a single, cohesive development. This is particularly relevant to the evolving character of the Sywell Plateau and the wider landscape, where solar energy infrastructure would become a prevailing and recognisable component of the local landscape pattern. Over time, this shift is likely to influence how landscape character is defined, described and valued, both locally and at district level. It would be reasonable to expect that future landscape character assessments would need to reflect this change, recognising solar development as a defining element influencing the area.	Due to the dispersed nature of the Sites within the Scheme, an assessment of the landscape and visual effects of Green Hill A-G and the Green Hill BESS, taken together, has been undertaken to determine the effects of the Scheme as a whole. The cumulative effects of each of the Sites are assessed and combined to achieve a set of effects of the Scheme to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme. The **ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]** has identified that development of the Scheme would result in Significant Adverse Effects to Landscape Character within the 1km Study Area. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons are set out below: 1. Dispersed nature of the Sites: The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road

LIR Ref.	Topic Area	Summary	Applicant's Response
			and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. 2. Nature of Scheme being 'overlaid' and reversable: For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' on the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. 3. Strong framework of existing vegetation: The strong framework of existing vegetation means that this would provide the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them

LIR Ref.	Topic Area	Summary	Applicant's Response
			integrate, particularly in views towards the horizon. 4. The benefits of mitigation: Year 15 would bring forward the benefits of the new planting in reducing the adverse effects. Please refer to the LVIA specifically Table 8.10 which sets out the Planting Typologies utilised within the **OLEMP Revision A [REP1-137]** and Table 8.11 of the **ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]** which sets out the quantity of landscape enhancements the Scheme would provide: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.14km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and • 1,079.53ha of groundcover. 5. Biodiversity Net Gain: In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver

LIR Ref.	Topic Area	Summary	Applicant's Response
			additional enhancement and connections to wider ecological networks as well as contributing to the enhancement of the quality of the landscape going well beyond biodiversity net gain. 6. Legacy Landscape: Legacy Landscape is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, agricultural fields would be returned back to agriculture. The landowners would choose how the land is to be used and managed, and it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has

LIR Ref.	Topic Area	Summary	Applicant's Response
			matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.
WNC 4.59 to 4.62	Landscape and Visual Impacts: Conclusion	The Council are supportive of the principle of renewable energy generation in line with national policy but recognise that such schemes must be carefully sited and designed to minimise landscape and visual harm. The ES provides a robust assessment consistent with GLVIA3, and the iterative pre-submission engagement on receptors, methodology and mitigation was welcomed. While the assessment approach has been discussed in detail with the applicant previously and is found to be	The Applicant notes this comment. The successful delivery, establishment and long-term management of mitigation proposals would be secured within the DCO through Requirement 7, which secures the delivery of a detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP Revision A [REP1-137]** for the lifetime of the Scheme.

LIR Ref.	Topic Area	Summary	Applicant's Response
		generally sound, professional judgement differs on the extent of residual impacts. The 24-month construction period will result in sustained temporary disturbance and perceptible change to local landscape character and tranquillity. During operation, the Scheme will introduce a large-scale and engineered influence across multiple parcels of open countryside. Although the mitigation planting and habitat measures will provide long-term benefits, these will not fully offset adverse effects on character, as acknowledged by the applicant in their assessment of landscape impacts on the 1km, 2km and 5km Study Area. Cumulatively, the collective presence of multiple dispersed parcels will change the perception of rurality within this part of Northamptonshire, introducing infrastructure as a recurring feature. Overall, as the applicant acknowledges, many residual and cumulative impacts on landscape and visual receptors are likely to remain adverse, particularly within and around the main development parcels. The extent and duration of these effects will depend on the successful delivery, establishment and long-term management of mitigation proposals. The Examining Authority should therefore ensure that sufficient detail, enforceability and monitoring provisions are in place to secure these measures and to demonstrate that the anticipated reductions in landscape and visual effects can be achieved over time.	

LIR Ref.	Topic Area	Summary	Applicant's Response
WNC 4.67 to 4.68	Transport Assessment (TA): Traffic Impact	The TA does not include any junction or network capacity assessments. The need for such assessments can only be determined once the trip generation has been agreed – see note below. Trip generation has been significantly changed since initial preapplication comments on the scoping were made. It is acknowledged that the greatest impact (and therefore considerations for assessment) will be during the construction phase. The operational phase of the development will not have a meaningful impact on the highway network.	The acknowledgement that the operational phase will not have a meaningful effect on the highway network is noted. Details of the trip generation are included in the **ES Appendix 13.2: Transport Assessment (Part 1) [APP-151]**. The **OCTMP Revision A [REP1-145]** provides measures to manage the construction traffic outside of the network peak hours and to minimise the number of worker trips through shuttle buses and car sharing. As a result, junction capacity assessments are not considered to be necessary.
WNC 4.69 to 4.72	Transport Assessment (TA): Personal Injury Collisions	TA section 2.4 reviews personal injury collisions for the roads in the study area and provides the full output at Appendix B. It should not be necessary for the reader of the TA to have to review the collision data included at TA Appendix B in order to understand the nature of relevant collisions; for example, did they primarily involve HGVs, are there pedestrian safety concerns etc. The TA summary does not confirm if any accident cluster locations exist on any of the roads and/or junctions that will be used to access the development Sites, whereas some of the plans within Appendix B show a number of collisions have occurred at some of the locations; for example Plan 7 (Red House Lane crossroads) with 9 collisions.	**ES Appendix 13.2: Transport Assessment Part 1 of 3 [APP-151]** provides an assessment of personal injury collisions for the roads in the study area and has informed the wider consideration of environmental impacts. The analysis is considered sufficient to inform this, although the comments made by the highway authority are noted and will be discussed further at the meeting to be held with WNC on 27 November 2025.

LIR Ref.	Topic Area	Summary	Applicant's Response
		The TA does not provide a detailed review of the nature of and type of vehicles involved in recorded collisions at roads proposed to be used as works access routes and therefore it is unclear if the addition of works related traffic will have the potential to exacerbate any existing causation factors.	
WNC 4.73 to 4.74	Transport Assessment (TA): Public Transport	The TA confirms that 'No site is further than 10 miles from the nearest railway station.' With the minimum distance range being between 5.2 and 8.9 miles depending on the solar farm Site. Given that a taxi connection would be required to complete the journey to work it seems unlikely that rail travel will represent a viable option for worker commuter journeys. The TA does not provide any information on bus services. It is standard practice to include details on bus provisions in TA's when reviewing public transport.	Public transport is not considered to provide a role in direct travel to the Scheme. The rural location of the Scheme is such that the use of buses to provide direct access by workers is unlikely to play a significant role. The approach commits to a strategy around use of shuttle buses connecting the Scheme to key hubs such as hotels and travel hubs such as railway stations. Please refer to Section 6 of the **OCTMP Revision A [REP1-145]** for construction worker traffic mitigation.
WNC 4.75 to 4.78	Transport Assessment (TA): Legislation, Planning Policy and Guidance	TA paragraph 3.2.7 quotes from NPS EN-1 and confirms that 'Paragraph 5.14.21 concludes that 'The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision'. Further, Paragraph 5.14.18 of NPS EN-1 states 'A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction	Public transport is not considered to provide a significant role in direct travel to the Scheme. The rural location of the Scheme is such that direct access by workers using public transport is unlikely to play a significant role. The approach commits a strategy around use of shuttle buses connecting the Scheme, to key hubs such as hotels and travel hubs such as railway stations. It should also be noted that, whilst the **ES Appendix 13.2: Transport Assessment [APP-151** to **APP-153]** does not assume the

LIR Ref.	Topic Area	Summary	Applicant's Response
		phase of the development and by enhancing active, public and shared transport provision and accessibility'. As noted above, under the heading of Public Transport, the TA does not include any details to confirm if workers will be able to use bus travel or what consideration has been given to the provision of adequate active, public or shared transport access and provision other than shuttle mini buses. Similarly the TA does not consider how the proposals may affect existing pedestrians and cyclists using the routes proposed for construction traffic use. The Council wish to request further detail to clearly demonstrate that the development proposals have considered the Policy requirements, and in particular with regard to ensuring highway safety, promoting active, public and shared transport and that no material harm is caused to the living conditions of residents throughout the construction phase.	use of public transport by construction workers, thereby ensuring a worst case has been assessed, the **OCTMP Revision A [REP1-145]** does include, as part of a Construction Worker Travel Plan, increasing knowledge of the public transport and active travel opportunities available to construction workers. In this way, any use of public transport by construction workers will result in improved outcomes to the worst case assumptions assessed in the Transport Assessment. The potential for construction traffic to affect existing pedestrians and cyclists is considered in the assessment of non-motorised user amenity, fear and intimidation in **ES Chapter 13: Transport and Access Revision A [EX2/GH6.2.13_A]**. Consistent with the industry standard guidance from ISEP (formerly IEMA), a detailed assessment of these factors is required only where the transport impacts are of a sufficient scale and extent, determined by two rules: Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of HGVs will increase by more than 30%);

LIR Ref.	Topic Area	Summary	Applicant's Response
			Rule 2: Include highway links of high sensitivity where traffic flows increase by 10% or more. Full data showing the traffic flow increases associated with the peak construction period of the Scheme are set out in Table 13A1.3 of **ES Appendix 13.1 Transport and Access Assessment Tables [APP-150]**. This table shows that no link is estimated to experience an increase in traffic or HGVs of 30% or more, nor is any High Sensitive link anticipated to experience more than a 4.98% increase in traffic flows (Link 81, London Road, Bozeat). As noted in the ISEP guidance, at paragraph 2.18, "the day-to-day variation of traffic on a road is frequently at least + or – 10%" and "it should be assumed that projected changes in traffic of less than 10% create no discernible environmental impact". Paragraph 2.20 confirms that "a 30% change in traffic flow represents a reasonable threshold for including a highway link within an environmental assessment". In line with the guidance, as the predicted traffic flows are below the thresholds for detailed assessment, no environmental effects are anticipated, including to non-motorised users.

LIR Ref.	Topic Area	Summary	Applicant's Response
WNC 4.79 to 4.91	Transport Assessment (TA): Access to Sites within the Scheme	The proposal generally utilises pre-existing access points. These vary in quality, with some being infrequently used field gates. WNC commented during the pre-application stage that existing accesses may not provide the safest option in terms of position and visibility and should not be the primary determining factor in access choice. During construction particularly, these accesses will experience a significant intensification of use over the current scenario. At 4.4.7 the TA states 'During the construction phase, banksmen will be deployed at each access whenever construction vehicles are accessing or egressing at the access. This will ensure the safe movement of construction vehicles and will overcome any instances where the achievable visibility is below guidance, which is a factor at a small number of access locations. All construction vehicles will access and egress the Site in a forward gear.' Similar sentiments are expressed at TA paragraph 4.4.8 including that using accesses already used by agricultural vehicle means they are 'therefore considered appropriate for use by construction vehicles, with some upgrades and widening to enhance their function.' In general, agricultural accesses are typically historical in nature and most will not have been subject to an approval process by the LHA which would assess their suitability from a safety perspective. The fact that existing field accesses may be in use does not therefore automatically confirm that they are safe and so any upgrades made for the development should bring them up to an acceptable standard from a safety and suitability perspective.	The Applicant acknowledges the comments with regard to the design of the access points and met with West Northamptonshire on 18 November 2025 to discuss. The location of the accesses are illustrated in **ES Figures 13.3-13.5 Revision A [REP1-117** to **REP1-121]** for the north, central and southern areas. At the meeting with WNC on 18 November 2025, the Applicant agreed to include a table in each access design drawing to summarise the posted speed limit and the observed 85th percentile speeds on the approach to each access and the location of the observed speeds. The approach to access design identified by the highway authority has been undertaken. Visibility splays in accordance with the posted speed limit or recorded speeds (85th percentile) are shown in the access designs included in Appendix C of the **ES Appendix 13.2:Transport Assessment (Part 1 and 2) [APP-151** and **APP-152]** together with achievable visibility splays where required visibility splays in accordance with the observed 85th percentile speeds cannot be met. Where visibility splays in accordance with design standards for the observed speeds are

LIR Ref.	Topic Area	Summary	Applicant's Response
		If SSD along the public highway is sub-standard it is questioned how banksmen will be able to operate with regard to their own safety and be able to assess if it is safe for a construction vehicle to enter/leave the site. Also, how would the potential requirement for them to stop be conveyed to drivers approaching along the public highway? Appropriate SSD is needed to any warning signs and/or traffic-signals and so deployment of such cannot be automatically assumed as an appropriate solution. It is unclear how deploying personnel (banksmen) at an access with substandard SSD along the connecting roads will ensure that both the operatives involved and public will be safe. WNC request that the operation of any accesses where SSD is substandard and the management system(s) proposed are reviewed via an independent Road Safety Audit. The primary requirement is to optimise the site access location to meet current safety and visibility standards. Only if optimisation is demonstrated as not feasible should a substandard access with supporting mitigation/management measures and RSA be considered. Some of the site access plans show the highway boundary but in others the drawing key contains the legend for the highway boundary but it is not shown on the plan. None of the drawings show the application red line boundary and do not confirm via notes if it is coincident with the highway boundary (when that is shown). Some of the plans indicate visibility distances relative to 'observed speeds'; however it is not confirmed if the speed	not possible, there are a number of potential ways that the accesses could be managed during the construction phase to ensure safe access/egress for construction traffic, which include but are not limited to: • Temporary reduction of speed limit during the construction phase. Article 16 (traffic regulation measures) of the **Draft DCO Revision A [REP1-008]** provides 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. • Manually controlled temporary traffic signals by banksmen, which would be on green at all times and only manually put on red when construction traffic enters / exits the site access. • Signage warning of construction access ahead. • A 'Temporary Obstruction 15 (TO15)', in accordance with Chapter 8 Traffic Signs Manual – Traffic Safety Measures and Signs for Road Works and Temporary Situations (2009). This measure provides a short-term obstruction causing up to 15 minutes delay, and could be implemented using the powers in Article 16 (traffic

LIR Ref.	Topic Area	Summary	Applicant's Response
		are mean or 85th percentile. There is no information on the location of speed survey loops and so their appropriateness in determining approaching vehicle speeds cannot be verified. This information should be provided. It is assumed that for security reasons the accesses will need to be gated so that they can be locked outside of working hours. The drawings do not show proposed fence / gate positions. The drawings of each site access do not show any detailed information on kerbing, surfacing or drainage. It is not clear how far the bound and sealed surfacing extends from the crossover into the site at each access. The TA indicates that HGV access and egress movements would be scheduled not to coincide and be controlled by banksmen and presumably for that reason the sweptpath assessments do not allow for 2-way use of the accesses; however, it is unclear as to what would occur should entry and exit movements coincide which, for example, could potentially be between staff/visitors and arriving HGVs – the plans lack sufficient detail to explain how such situations would be dealt with. As a general observation, in all cases the access drawings confirm the access number but not its actual location and, in most cases, the key plan provided is too small to easily confirm it. It would be helpful to have a clearer, larger scale, location plan for the accesses.	regulation measures) of the **Draft DCO Revision A [REP1-008]** Signs informing drivers of the obstruction would be utilised to temporarily stop traffic to allow construction vehicles to access/egress. The access designs included in Appendix C of the **ES Appendix 13.2:Transport Assessment (Part 1 and 2) [APP-151** and **APP-152]** provide the level of detail required to demonstrate that the accesses can be constructed within the DCO order limits. Prior to commencement of construction, the accesses will go through detailed design and the various stages of Road Safety Audit. The detailed design will include details on vertical alignment, drainage, carriageway construction, fencing, vegetation clearance. The detailed design of the accesses would need to be undertaken to the satisfaction of the local highway authority. This could be through the detailed CTMP, which could provide the detailed design information for the accesses and will need to be approved by the relevant planning authority in consultation with the relevant highway authority; or the detailed design of the accesses may be managed through an agreement, separate to the detailed CTMP, under Article 15 (agreements with street authorities) of the **Draft DCO**

LIR Ref.	Topic Area	Summary	Applicant's Response
			Revision A [REP1-008]. The preferred approach would be agreed with the relevant highway authority during the detailed design phase. The accesses are authorised by article 14 (access to works), with construction of the accesses carried out under Article 10 (power to alter layout, etc., of streets). Permanent accesses will be maintained in accordance with Article 11 (construction and maintenance of altered streets) of the **Draft DCO Revision A [REP1-008]**. Both temporary and permanent street works must be reasonably satisfactory to the relevant street authority. In relation to fencing, Requirement 10 in Schedule 2 to the **Draft DCO Revision A [REP1-008]** requires details to be submitted for approval prior to the commencement of the development.
WNC 4.92	Transport Assessment (TA): Access to Sites within the Scheme – Area A – Access Plan No 1	• Drawing Key includes a line type for Highway Boundary but it appears not to be included on the plans nor is the red line boundary. • The visibility splay to the south of the access is impeded by a hedge / trees which are noted as to remain and so on the basis that approaching traffic speeds from Newland Road 'would be low' an 'alternative' splay is shown to the opposite side of the road and thus not in compliance with CD123 / 3.4 standards.	The Applicant acknowledges the comments with regard to the design of the access points and met with West Northamptonshire on 18 November 2025 to discuss. The DCO order limits are included on the access design and the highway boundary will be added to an updated site access drawing for Access A1, included in Appendix C of the

LIR Ref.	Topic Area	Summary	Applicant's Response
		• The proposed 'edge of proposed access' line does not accommodate the sweptpath of the cable drum vehicle and hence it is unclear if the latter can enter the site or instead if the assessment is to confirm that cable drums will be unloaded somewhere nearby on the public highway (See TA review comments) • The drawing does not confirm how the achievable visibility splays of around 110m compare with the speed limit or measured traffic speeds. Assuming 60mph standard CD109 indicates a desirable minimum SSD of 215m.	**ES Appendix 13.2:Transport Assessment Part 1 [APP-151]**, at Deadline 3**.** Given that the peak use of the access will be during the temporary construction phase, the design of the access has sought to retain the trees to the south of the access, with the potential to raise the crowns to improve visibility. Given the bend in Broughton Road to the south of the access, vehicle speeds will be lower than the posted speed limit and visibility requirements will therefore also be lower. Refer to response to WNC 4.79 to 4.91 for the approach to temporary traffic management for accesses that do not comply fully with CD123 / 3.4 standards. Cable drum deliveries will all take place off the highway as confirmed within the **OCTMP Revision A [REP1-145].** The access designs for those accesses that need to accommodate cable drum vehicles during the construction phase show the increased radii needed to accommodate these movements. Consideration will be given at detailed design stage to the treatment of the additional bell mouth area to accommodate the cable drum vehicles, which will occur over a relatively short period within the construction phase. This will be different for each access depending on the conditions at each location.

LIR Ref.	Topic Area	Summary	Applicant's Response
			In some instances, it may be possible to remove vegetation and temporarily widen the access with track matting to accommodate the cable drum deliveries. In other instances, more detailed engineering solution will be required to take account of drainage/culverts and other constraints. Cable drum deliveries will only be for a short period during the construction phase and therefore the access design should not be over engineered for these short term deliveries.
WNC 4.93	Transport Assessment (TA): Access to Sites within the Scheme – Area A – Access Plan No 2	• Highway Boundary is included on the plans but it is not confirmed if it is coincident with the red line boundary which is not shown. • The visibility splay to the southwest of the access is not shown as connecting to the nearside of the road in compliance with CD123 / 3.4 / 3.9 standards. The layout should be amended to confirm if visibility is impeded by existing features on that side. • There is a 90-degree bend in the road to the northeast which will affect approaching driver visibility and could be relevant to ensuring safe use of the access (see comments regarding banksman control of public traffic movements etc). • The drawing does not confirm how the achievable visibility splays of compare with the speed limit or measured traffic speeds.	The Applicant acknowledges the comments with regard to the design of the access points and met with West Northamptonshire on 18 November 2025 to discuss. Highway boundary and DCO order limits are included on the access drawing for Access A2 included in Appendix C of the **ES Appendix 13.2:Transport Assessment Part 1 [APP-151].** The visibility splay to the south of the access does connect to the nearside of the road and is not impeded by existing features on that side of the carriageway. The site access drawing will be updated at Deadline 3 to include visibility splays in accordance with the 85th percentile speed limits. Refer to response to WNC 4.79 to 4.91 for the approach to temporary traffic management for

LIR Ref.	Topic Area	Summary	Applicant's Response
			accesses that do not comply fully with CD123 / 3.4 standards. Further information will be provided to the highway authority with regard to the observed speed limits from the Automatic Traffic Counts and the posted speed limit and how this relates to the visibility splays.
WNC 4.94	Transport Assessment (TA): Access to Sites within the Scheme – Area A – Crossing 2	• Drawing Key includes a line type for Highway Boundary but it appears not to be included on the plans nor is the red line boundary. • Confirms that visibility splays in both north and south directions from the east side crossing of Newland Road are significantly impeded by vegetation which is not confirmed as being removed. • The drawing does not confirm how the achievable visibility splays of compare with the speed limit or measured traffic speeds.	The Applicant acknowledges the comments with regard to the design of the access points and met with West Northamptonshire on 18 November 2025 to discuss. The DCO order limits are shown on the access drawing and the highway boundary will be added to the site access drawing for Access A1 included in Appendix C of the **ES Appendix 13.2:Transport Assessment Part 1 [APP-151]** at Deadline 3**.** Refer to response to Q20.0.11 in the **Applicants Responses to ExA First Written Questions [REP1-163]** with regard to the proposed use and management of the crossing over Newland Road. The crossing point is to be managed with banksmen, but if any additional temporary traffic management for the management of the crossing is required, this will be developed by the contractor in accordance with Chapter 8 of the New Roads Street Works Act (NRSWA)

LIR Ref.	Topic Area	Summary	Applicant's Response
			and will be subject to the approval of the highway authority as part of the application for a road space permit in accordance with the applicable street works permit scheme.
WNC 4.95	Transport Assessment (TA): Access to Sites within the Scheme – Area A – Access Plan 2-1	• Highway Boundary is included on the plans but confirmation of the red line boundary is not. • Visibility splay to the north east side of the access is not constructed in compliance with CD123 / 3.9 standards which confirms that an additional area should be provided tangential to the outside of the bend. This would presumably result in the splay being impeded by vegetation which includes trees and a hedge which are not shown as to be removed. • The proposed 'edge of proposed access' line does not accommodate the swept path of the cable drum vehicle and hence it is unclear if the latter can enter the site or instead if the assessment is to confirm that cable drums will be unloaded somewhere nearby on the public highway (See TA review comments).	The Applicant acknowledges the comments with regard to the design of the access points and met with West Northamptonshire on 18 November 2025 to discuss. The highway boundary and DCO order limits are included on the access drawing for Access 2-1 included in Appendix C of the **ES Appendix 13.2:Transport Assessment Part 1 [APP-151].** As shown on the access drawing, the observed 85th percentile speed to the north of the access was 56 mph and to the south of the access was 55mph. The access drawing shows the visibility splays in both directions can be achieved in accordance with the observed speed with minor vegetation trimming and removal of one dead tree to the south of the access. Refer to the response to WNC 4.92 above with regard to the design of the accesses for the cable drum deliveries.
WNC 4.96 to 4.98	Transport Assessment (TA): Access to Sites	<u>Access Plan Area B – Access 1:</u>	The Applicant acknowledges the comments with regard to the design of the access points

LIR Ref.	Topic Area	Summary	Applicant's Response
	within the Scheme – Access Plan Area B	• Drawing Key includes a line type for Highway Boundary but it appears not to be included on the plans nor is the red line boundary. • The proposed 'edge of proposed access' line does not accommodate the sweptpath of the cable drum vehicle and hence it is unclear if the latter can enter the site or instead if the assessment is to confirm that cable drums will be unloaded somewhere nearby on the public highway (See TA review comments). • The drawing does not confirm how the achievable visibility splays of compare with the speed limit or measured traffic speeds. <u>Access Plan Area B – On Site Access</u> • Drawing note indicates that swept-path of vehicle extends outside of the site boundary? <u>Access Plan Area B – Access 2:</u> • Red line boundary not confirmed. • The drawing notes confirm the potential influence of vegetation on visibility splays has not been assessed as this stage and so it cannot be confirmed if the indicated levels of visibility are achievable. • The drawing does not confirm how the achievable visibility splays of compare with the speed limit or measured traffic speeds.	and met with West Northamptonshire on 18 November 2025 to discuss. The DCO order limits are included on the site access drawing and the highway boundary will be added to the site access drawing for Access B1 included in Appendix C of the **ES Appendix 13.2:Transport Assessment Part 1 [APP-151]**, at Deadline 3**.** Refer to the response to WNC 4.92 with regard to the design of the accesses for the cable drum deliveries. The access drawing for Access B1 shows the visibility splays in accordance with the 85th percentile observed speeds (52mph). Sywell Road in the vicinity of the site access has a derestricted speed limit. The site access design shows that visibility to the north is achievable in accordance with the 85th percentile speed limit but is not quite achievable to the south (i.e. y distance of 154m compared to the desirable y distance of 170m). As such, temporary traffic management measures are likely to be required to warn drivers of construction traffic turning into and out of the access as well as potentially temporarily reduce the speed limit to ensure visibility and Sight Stopping Distances (SSD) comply with CD123 / 3.4 standards.

LIR Ref.	Topic Area	Summary	Applicant's Response
			Refer to response to WNC 4.79 to 4.91 for the approach to temporary traffic management for accesses that do not comply fully with standards.
WNC 4.99 to 4.102	Transport Assessment (TA): Access to Sites within the Scheme – Cable Route	<u>Cable Route – Access 1:</u> • Red line boundary not confirmed. <u>Cable Route – Access 2:</u> • Red line boundary not confirmed. • The distance applicable to the visibility splay connecting with the tangent of the road curve to the west of the access is not confirmed. • The abnormal vehicle occupies the full carriageway at the public highway and hence (unspecified) management of public use will be required when cable vehicles use the route. <u>Cable Route – Access 3:</u> • Red line boundary not confirmed. <u>Cable Route – Access 5:</u> • Red line boundary not confirmed.	The Applicant acknowledges the comments with regard to the design of the access points and met with West Northamptonshire on 18 November 2025 to discuss. The DCO order limits and highway boundary are included on the site access drawings for CR1, CR2, CR3 and CR5 included in Appendix C of the **ES Appendix 13.2:Transport Assessment Part 1 [APP-151].** The site access drawing for CR1 and CR5 will be updated to clarify the visibility to the tangent of the curve. Cable drum deliveries will take place fully off the highway. Temporary traffic management for the management of cable drum deliveries will be required. Refer to response to WNC 4.79 to 4.91 for the approach to temporary traffic management. The temporary traffic management will be developed by the contractor in accordance with Chapter 8 of the New Roads and Street Works Act 1991 (NRSWA) and will be subject to the approval of the highway authority as part of the

LIR Ref.	Topic Area	Summary	Applicant's Response
			application for a road space permit under the relevant street works permit scheme.
WNC 4.103 to 4.105	Transport Assessment (TA): Access to Sites within the Scheme	WNC confirm that all proposed site access arrangements will be subject to Stage 1 Road Safety Audit (RSA) in accordance with GG119 and these must be carried out prior to determination of the application. The applicant will be required to agree the RSA brief with the Local Highway Authority before proceeding. All other access points associated with Green Hill C, D, E, F, G and BESS as well as the remaining Cable Route Accesses are located off highway that is not under the jurisdiction of West Northamptonshire Council. Whilst the DCO will make provision for the legal agreement for undertaking works within the public highway (normally provided under a Section 278 Agreement, Section 184 Licence or Section 50 Licence), it will still be necessary for the applicant to engage with the LHA in respect of road space booking.	The Applicant notes these comments. It should be noted that the application is for an outline design of the Scheme using the Rochdale Envelope principles. Detailed design, including the requirements for visibility splays and traffic management signage required for accesses, will be carried out post-consent alongside road safety audits. The Applicant also acknowledges the Street Works Permit Scheme operated by WNC, and confirms that these are applied by article 9 of the **Draft DCO Revision A [REP1-008]**.
WNC 4.106 to 4.119	Transport Assessment (TA): Forecast Trips	TA 5.2.5 confirms that 'The forecast of HGV movements is based upon forecasts that have been agreed through wider DCO Solar Schemes at Cottam and West Burton promoted by the Applicant. A ratio of HGV movements per solar module has been calculated and is considered an appropriate variable to consider the wider movement associated with each site where no discernible or significant design difference is identified.' Using data from other sites is a reasonable approach but it is not clear how the prediction of HGV movements at those	The Applicant acknowledges the comments and has contacted West Northamptonshire officers to arrange meetings to discuss the comments in detail with a view towards providing additional clarification. Cottam Solar Project and West Burton Solar Project are solar and battery schemes similar in scale to Green Hill Solar Farm, with grid connection capacities of 600MW and 480MW respectively. The three projects share the

LIR Ref.	Topic Area	Summary	Applicant's Response
		solar farms was derived, if they are of similar magnitude as Green Hill etc. So that the reader can validate the HGV trip composition, it would be useful to provide a fuller explanation of how HGV trips have been derived; for example, by explaining if deliveries are of complete solar panel units, how many units are carried per truck, how many are required in each area of the development, installation rate etc. With regard to construction workers, it is stated at peak a total of 1,071 staff will be deployed at the solar Sites and 67 at the BESS, giving a combined total of 1,138 workers, whereas the 'Total workers by Grouping at Table 5.2 add up to a total of 1,099 staff (39 less workers). TA '5.2.15 Measures are proposed to minimise the number of construction workers travelling by car or van. The measures include the provision of shuttle buses to transport construction workers to and from each Site. This is particularly important for workers who are travelling from a wide area, who are likely to use local hotel accommodation. These construction workers can be transported to the Site by shuttle buses. It is expected that generally minibuses will be used.' Table 5.2 indicates that 525 workers are forecast to travel by shuttle bus to Sites A-G and the BESS with Table 5.3 adding a further 36 cable route staff doing so - thus giving a combined total of 561 workers travelling to/from the Sites each day in a total of 38 mini (shuttle) buses and, as noted in the TA, to do so it is confirmed that these workers would likely be staying at 'local hotel accommodation'.	same principal components and similar design parameters. The construction delivery numbers for Cottam and West Burton were derived from industry knowledge of solar farm construction, reviews of other schemes and through discussions with manufacturers. The number of deliveries was calculated based on quantities of solar modules, mounting structures, access track, ancillary equipment and landscaping required and HGV delivery capacities. It is expected that there will be a relatively flat profile of deliveries across the construction period as solar panel deliveries are spread over the construction period so they can be installed shortly after they arrive on Site. In terms of construction workers, paragraph 5.2.13 of the **ES Appendix 13.2:Transport Assessment (Part 1) [APP-151]** states *"In addition, 67 workers will be positioned at the Battery Energy Storage Site. For Green Hill C, the worker numbers associated with the construction of the BESS have been assessed where these are greater in number and the construction is programmed to follow the construction of the Solar element."* The first sentence is intended to be read as a clarification of the number of workers located specifically at the BESS. The 67 workers at

LIR Ref.	Topic Area	Summary	Applicant's Response
		Hotels obviously vary in size and also in terms of cost per night and so not all hotels will prove to be suitable for providing worker accommodation. This fact and the very large number of staff involved could present a significant challenge. As a simple illustration, if it was assumed that on average each hotel could accommodate 20 workers then a requirement for 28 hotels (561÷20) over the construction period of 2 years would be needed and each would need to be located within a proximity to each other and the sites to make collecting staff in a timely manner using mini-buses viable. Taking the loop comprising the A509, A45 and A43 as a boundary, an online search suggests that there are not many hotels in the area 'local' to the sites - with around 4 at Wellingborough to the east (a Premier Inn, Travelodge and 2 other smaller hotel/restaurants in the town); the Aviator at Sywell (£112 per night in low season), 4 along the A43 including a Travelodge and some smaller, privately run hotels nearby at the Round Spinney area northeast of Northampton, 2 at Bird Lake pastures (but only 2 bed) and 'The Worlds End' hotel at Ecton (currently £88/night). There are other hotels within and around the centre of Northampton but their cost per night and size will mean that not all would prove suitable in providing long-term worker accommodation and this area is approximately 15+ miles distance from some of the solar Sites and so is not exactly 'local' to them. At a cursory level it therefore appears that finding suitable hotel accommodation for 561 workers local to the solar	the BESS are included in the 1,071 worker across the Scheme and are not in addition to them. The second sentence is correct. For Green Hill C there is a solar element and potentially a BESS. The solar element would generate 28 workers and the BESS at Green Hill C would generate 76 workers. Should both the solar and BESS come forward at Green Hill C, they would not be constructed at the same time. Therefore, the reasonable worst case number of workers for Green Hill C is 76, which are included in the 1,071 total workforce number. The sum of the workers set out in Table 5.2 of the **ES Appendix 13.2:Transport Assessment (Part 1) [APP-151]** is 1,099, however this includes both Green Hill C solar (28 workers) and BESS (76 workers). As set out above, this scenario would not transpire. The Applicant acknowledges that there are a greater number of accommodation facilities and available serviced accommodation rooms in Northampton than in Wellingborough. As such, it is considered that Wellingborough is more likely to be used as a 'collecting' hub for workers arriving from Wellingborough, Kettering, Corby, Thrapston and Rushden, together which have a similar number of

LIR Ref.	Topic Area	Summary	Applicant's Response
		sites may be difficult, or potentially not possible. It could involve using a large number of hotels which could be located much further afield than those shown, including at the centre of Northampton to the southwest of the sites. A similar worker travel / accommodation situation is assumed to apply whenever replacement of the solar panels and other equipment is required (notwithstanding the suggested timeframe for this being 30 years post initial installation). The TA applies a c.50% discount to worker trips based on the premise that this proportion of the workforce will be staying at local hotels and will be collected and dropped off each day by a shuttle bus service within a suitable journey timeframe. A cursory review using Google Maps suggests that the TA assumptions concerning the availability of suitable local hotel accommodation to house 561 workers might not be realistic and consequently there is a risk that the TA may be significantly underestimating the volume of car based trips that would otherwise be made by workers each day. The assessment of worker trips should be based on the confirmed availability of how many workers can actually be accommodated in the nearest (local) hotels and thus could use shuttle buses. Should it transpire that the shuttle bus to/from hotels scenario is unrealistic the applicant should provide a sensitivity assessment of an alternative scenario in which the majority of the workforce (proportion as agreed with WNC) are assumed to travel by car directly to/from their	accommodation facilities to the Northampton area. The assessment of socio-economic effects in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]**, identifies a total of approximately 13,500 serviced accommodation rooms across North and West Northamptonshire, Milton Keynes and Bedford, thus demonstrating that if workers cannot be accommodated in the most immediate areas to the Scheme, there is sufficient accommodation space within a commutable distance from the Scheme.

LIR Ref.	Topic Area	Summary	Applicant's Response
		respective sites assuming a vehicle occupancy rate of 1.5 persons as noted in the TA. The TA mentions picking up staff from hotels or 'collection points' but it is assumed this does not include park and ride site(s) provided for workers from which shuttle buses could operate to the various solar sites as this is not considered in any detail in the TA.	
WNC 4.120 to 4.126	Transport Assessment (TA): Vehicle Trip Distribution	In connection with the distribution of shuttle bus trips TA 6.2.7 confirms that '*It has been assumed that the shuttles will be collecting workers from hotels and collection points from within Wellingborough and Northampton due to their proximity to the majority of the sites. 6.2.8 It has been assumed that 50% of shuttles will depart from Wellingborough and 50% from Northampton. The routes that the shuttles take to each site or construction compound have been determined by assessing the most efficient route using the MRN and SRN where possible.'* As highlighted above, a brief search online indicates there are possible only around 4 hotels in Wellingborough with the higher number being located around the centre of Northampton. Notwithstanding the query above concerning the viability of being able to accommodate 561workers in local hotels, the bias in the availability of hotels at Northampton suggests that a 50/50% split in shuttle bus movements between Wellingborough and Northampton may not be realistic. In addition to validating that the discount assumed in worker trips on the basis of their using local hotels and shuttle buses as realistic, the distribution of the bus trips	The Applicant acknowledges the comments and has arranged a meeting on 27 November 2025 with West Northamptonshire officers to discuss the comments in detail with a view towards providing additional clarification where required. The Applicant acknowledges that there are a greater number of accommodation facilities and available serviced accommodation rooms in Northampton than in Wellingborough. As such, it is considered that Wellingborough is more likely to be used as a 'collecting' hub for workers arriving from Wellingborough, Kettering, Corby, Thrapston and Rushden, together which have a similar number of accommodation facilities to the Northampton area. The assessment of socio-economic effects in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]**, identifies a total of approximately 13,500 serviced accommodation rooms across North and West

LIR Ref.	Topic Area	Summary	Applicant's Response
		also requires validation as it seems a much higher bias to the west of the Site (Northampton) may in fact apply. In relation to vehicle movements associated with the northern area Sites the TA indicates '*6.4.2 The preferred construction route will be from the A14 Junction 8 leading to the A43. From the A43, each site is accessed via local roads.'* The origin of HGV movements is not confirmed but it would seem reasonable to assume that given the specialist nature of the solar panels etc to be installed there is a potential they will come from one or possibly a small number of specialist manufacturers / suppliers. If so, there is a potential that a majority of HGV trips could be made using a common route(s) until reaching the area around the Green Hill Sites; however, it is unclear from the TA if any potential bias in arrival and departure direction has been considered as the proposed routes are described as being 'preferred'. For example, if HGV deliveries had an origin which means they would approach the area via the M1 from the southeast, the most direct access route to/from the northern area would be via the A509 (to illustrate, the M1 J14 Broughton Interchange to Wellingborough is 18.4 miles via the A509 but 26.4 miles via the A45). Is there a potential for such an eventuality to significantly affect the assumed distribution? In respect of the north Sites in particular it would be beneficial to understand if the equipment to be installed will be sourced from a single supplier or suppliers that would result in a south-westerly bias of direction for trips on the	Northamptonshire, Milton Keynes and Bedford, thus demonstrating that if workers cannot be accommodated in the most immediate areas to the Scheme, there is sufficient accommodation space within a commutable distance from the Scheme. Workers would be travelling by car or minibus via the Strategic Road Network before routing on the local roads in the vicinity of the sites to access the Construction Compounds. The HGV routes illustrated in **ES Figures 13.3-13.5 Revision A [REP1-117** to **REP1-121]** for the north, central and southern areas respectively show the prescribed HGV routes. Compliance to the HGV routes is set out in the **OCTMP Revision A [REP1-145].** Refer to the response to Q20.0.02 in the **Applicants Responses to ExA First Written Questions [REP1-163]** with regard to the origin of HGVs and HGV routes.

LIR Ref.	Topic Area	Summary	Applicant's Response
		SRN to/from the area around the Sites and if that would in any way alter the distribution of trips assumed / indicated.	
WNC 4.127 to 4.131	Transport Assessment (TA): Construction vehicle management measures	The treatment of the access points utilised and upgraded post construction requires clarification. At 9.1.3 the TA notes that '*Cable Route Corridor accesses, whilst generally utilising existing access points, are temporary insofar as they are only required for the construction of the cable connection. Once used, they can be returned to a previous state or in cases where, for example, the changes constitute a betterment to an existing access, may remain in situ.*' It is unclear why the accesses used for the cable route corridor will be only used for the construction phase as presumably some maintenance checks and potentially future replacement will be needed? Similarly, the TA does not confirm if the upgraded accesses used for the construction of the solar farms are returned to their former state following construction or remain over the life of the scheme up to the decommissioning stage. Whilst the TA mentions that there will be 'provision of parking on-site, to ensure that vehicles are not parked on the local highway network alongside monitoring to ensure this is being adhered', no assessment of likely parking demand / requirements is provided. It is recommended that a detailed assessment of parking requirements is provided to include all staff and visitor car needs plus shuttle bus and site vehicle parking and any other requirements which may reasonably be needed; for example it seems feasible that holding areas might be	Cable access points are required for the purposed of installing the connection cable between Solar Sites. The cable is installed below the ground and as such as limited access requirements in the future. Cable access points are therefore only required during the construction and decommission phases, although an access may require reinstatement during the operational phase in the unlikely event of a failure requiring the cable to be replaced. Further details relating to the phases across which access points are required is provided in Table 4.1 of **ES Appendix 13.2 Transport Assessment Part 1 of 3 [APP-151].** Car parking will be within the Construction Compounds and managed through the Construction Worker Travel Plan, which is a requirement of the **OCTMP Revision A [REP1-145].** Given the level of HGV movements forecast for each access, it is not envisaged that HGV holding areas would be required. Instead, a delivery booking system is proposed to manage the flow of deliveries across the

LIR Ref.	Topic Area	Summary	Applicant's Response
		required for HGVs that turn up ahead of schedule and so have to wait to enter the site? The previous comments / queries concerning the discount applied to worker trips on the basis of hotel accommodation and shuttle bus provisions are clearly relevant to the assessment of parking requirements.	Scheme as set out in Section 5.5 of the **OCTMP Revision A [REP1-145].**
WNC 4.132	Transport Assessment (TA): Decommissioning Phase	The development will have a design life of 60 years. It is not possible to forecast traffic scenarios so far into the future but it is noted that the DCO will secure a final Decommissioning Plan at the end of the developments life. This would assess all highway and access impacts at that time.	The limited ability to forecast traffic scenarios 60 years into the future is noted and agreed. The Decommissioning Plan will identify measures for decommissioning. A new assessment of impacts is not proposed but the plan will consider whether factors such as routes used during the construction phase remain appropriate.
WNC 4.133 to 4.145	Transport Assessment (TA): Abnormal Load Routing	Green Hill A, Green Hill A.2 & Green Hill B – Abnormal loads will approach all 3 sites from the A43. This is considered the most appropriate route and avoids settlements. Green Hill BESS – Whilst this site falls outside of West Northamptonshire's administrative boundary, the route for 5 No. of the largest abnormal load movements pass along roads for which WNC are highway authority. The proposed AIL route from M1 junction 15 to the BESS site is rather convoluted passing through housing estates, numerous junctions, along minor roads and through villages. The route passes a secondary school in Wootton and a primary school in Cogenhoe. It is noted that the route has only been tracked in one direction. The applicant should provide	The acknowledgement of the A43 route is noted. Applications for notification of AIL deliveries will be made by haulage operators, through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and the highway authority will be notified. The route through Cogenhoe has previously been used to transport abnormal loads associated with the Grendon Substation and is used to avoid constraints on the wider network.

LIR Ref.	Topic Area	Summary	Applicant's Response
		confirmation that the vehicle is able to be broken down once the load has been delivered and will exit the BESS site as 2 separate standard HGV size vehicles via the agreed HGV construction traffic route to the A45 via Station Road. Sufficient supporting information has not been provided by the applicant as to why this route has been chosen over using the Strategic Road Network. It is acknowledged that the movements have been notified via ESDAL and WNC have confirmed that the routes are capable of carrying the weight of vehicles involved. Cable Drum Movements – The TA states '*7.2.4 Multiple deliveries will be required across the Cable Route Corridor*'. The applicant is required to quantify these movements. Clarification is required for the route to be used to Cable Route Access 16 (Station Road). The route indicated is from the A428 and through the village of Cogenhoe (similar to the larger AIL movement), however the access has been tracked for the cable drum delivery vehicle accessing the site access to and from the north from the A45. All junctions along the AIL routes have been tracked for the vehicles to be used. Some junctions will require temporary plating and roadside furniture removal to enable access. The tracking demonstrates that some movements are quite constrained and in reality, kerb overrunning is likely even where it is shown wheel tracks remain within carriageway. WNC will require video survey of the passing of each AIL movement using its road network to ensure any highway	Further details regarding abnormal loads have been provided in the Deadline 1 submissions within the **OCTMP Revision A [REP1-145]** and **Transport and Access Routes Supporting Document [REP1-167].** The Applicant acknowledges the comments regarding cable drum movements and has contacted West Northamptonshire officers to arrange meetings to discuss the comments in detail with a view towards providing additional clarification where required and resolving the matters raised. The Applicant has provided sensitivity modelling of the cable route corridor traffic movements in the **Transport and Access Technical Note [EX2/GH8.2.5]** submitted at Deadline 2.

LIR Ref.	Topic Area	Summary	Applicant's Response
		damage attributable to the AIL movement is rectified by the applicant. The route to the BESS site will require the passage of the vehicle completely through a 7.5 tonne amenity weight restriction at Cogenhoe. The applicant is advised that in order to not contravene the restriction, a police escort will be required. As mentioned, above the route from M1 J15 to the BESS site passes 2 schools. The AIL movements must be undertaken either outside of school term time or outside of school peak hours. Temporary parking restrictions may be required, particularly for the route from M1 J15 to the BESS. In some cases the vehicle path is shown to cross an adjacent verge and/or footway and is described as 'oversail' where conflict with street furniture is anticipated which the drawing notes would require removal of street signs and directional bollards etc. However, no detail is included on how the use of the footway will be managed in such oversailing instances. Pedestrian safety must be ensured and a management plan detailing how pedestrian safety will be safeguarded should be required. In relation to deliveries of connecting cable TA paragraph 7.2.5 confirms that '*30 tonne cable drums will be required to deliver the connection between the Sites to Grendon National Grid Substation. The drums will be delivered on a Cable Reel Trailer and this vehicle, together with its material is classified as an abnormal load. The vehicle is*	

LIR Ref.	Topic Area	Summary	Applicant's Response
		smaller than those required to deliver the transformers at around 26m in length. Multiple deliveries will be required across the Cable Route Corridor. 7.2.6 The Cable Reel Trailer and vehicle will get as close to the relevant access location 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.' In the UK, the maximum permitted length of an articulated truck with low-loader trailer is 18m and so at 26m long there is a potential that the cable delivery HGVs may not be able to use the Site access points if the latter are designed to accommodate only standard articulated truck. TA paragraph 7.2.6 covers this scenario and implies that cable reels may possibly be unloaded on the public highway and towed to / along the cable route corridor. Under a scenario whereby the delivery vehicle cannot enter the cable route Site (see also comments on HGV tracking assessment plans) TA paragraphs 7.2.7-7.2.9 indicate the measures that will be implemented which could include the temporary laying of steel plates which would be necessary to protect the public highway; however, installing these very heavy protection features over a currently unknown distance of public highway, undertaking the unloading / towing of the drum and then removing the protection measures could be a lengthy process time wise, during which the highway concerned will presumably be closed to general use. Depending on the location the closure could obviously affect access for residents, delivery / service vehicle drivers and emergency services. The TA does not	

LIR Ref.	Topic Area	Summary	Applicant's Response
		comment on these aspects beyond suggesting they would be undertaken outside of peak highway use times. Further detail is required.	
WNC 4.146 to 4.148	Outline Construction Traffic Management Plan (OCTMP): Parking	Paragraph 2.6.1 confirms "Three Construction Compounds will be built to serve the Solar Array Sites and Cable Routes. These are proposed to accommodate the following elements: • Material and equipment storage; • Construction vehicle parking; • Site office; and • Construction worker welfare facilities. Neither the TA nor OCTMP provides a detailed assessment of parking needs during the construction phase and it is not confirmed if the 'Construction vehicle parking' noted above relates specifically to construction vehicles only (i.e., plant) or if it wou ld also include worker and visitor car parking. A fuller explanation is required to demonstrate that adequate parking will be provided for the construction phase of the development. (NB the queries concerning vehicle trip generation assumptions are pertinent to the potential staff parking requirements). Notwithstanding the query above concerning the assessment of parking needs, the OCTMP does not confirm how staff and visitors parking at the compounds will travel to/from the various sites.	Workers would travel to the construction compounds for the Cable Route Corridor and Green Hill sites either as a car driver/passenger or via shuttle bus. The total number of vehicles associated with construction workers for each of the Green Hill sites is set out in Table 5.2 of the **ES Appendix 13.2: Transport Assessment (Part 1) [APP-151].** The number of vehicles associated with construction workers for the Cable Route Corridor is set out in Table 5.3 of the **ES Appendix 13.2: Transport Assessment Part 1 of 3 [APP-151].** The **OCTMP Revision A [REP1-145]** requires a Construction Worker Travel Plan to be prepared and approved by the relevant planning authorities, in consultation with the relevant highway authorities and will include management of worker travel and parking.

LIR Ref.	Topic Area	Summary	Applicant's Response
WNC 4.149 to 4.151	Outline Construction Traffic Management Plan (OCTMP): Access Points	Paragraphs 2.5.1 and 2.5.2 of the Outline Operational Traffic Management Plan read as follows: *2.5.1 Access points across the Scheme are proposed for construction and operation purposes for the Sites, Cable Corridor and Cable Construction Compounds. The majority of access points will be improved existing field accesses.* *2.5.2 Access points used during the construction phase of the Solar Sites may also be utilised during the scheduled replacement phase. In addition, new access points are proposed to support the day-to-day operational requirements of the solar sites at Green Hill A and D.* The above statements imply that the accesses created for the construction phase may also be used during the operational and scheduled replacement phases of the scheme and that additional accesses may also be created for the operational requirements of solar sites A and D. Clarification is required concerning the retention and/or restoration of the numerous site access points created for the construction phase of the scheme.	Details relating to the permitted movements at site accessed are set out in Table 13.11 in **ES Chapter 13: Transport and Access Revision A [EX2/GH6.2.13_A].**
WNC 4.152 to 4.155	Outline Construction Traffic Management Plan (OCTMP): Deliveries	Section 5 of the OCTMP confirms the following 'Procedure for Arrival to Site' • *Drivers will be allocated a slot arrival time and instructed which access/route to use;* • *Where required, when the vehicle is due, the banksmen will be notified and will position at the relevant access;*	We note the comments from West Northamptonshire Council on the procedure for arrival at site. The delivery booking system set out in Section 5.5 of the **OCTMP Revision A [REP1-145]** is the primary mechanism for managing the flow of HGV movements to/from the accesses across the Scheme. The issues identified by WNC with the use of banksmen in addition to the delivery booking

LIR Ref.	Topic Area	Summary	Applicant's Response
		• *The driver will then be notified to travel to the Site via the agreed route;* • *All operatives will communicate with each other, as necessary; and* • *Where required, banksmen will assist HGVs to manoeuvre from the public highway into the Site accesses.* Step 3 above confirms that in order to arrive at the allotted time, HGV drivers are notified to travel to Site only once the banksmen are in position at the relevant access. The OCTMP does not confirm where HGV drivers park whilst awaiting the instruction to travel to the site. Given the multiple Sites it seems possible that deliveries could take place at multiple locations which could lead to more than 1 HGV arriving close to site to await instruction to proceed. The availability to use lay-bys on surrounding roads cannot be guaranteed as they could be used by other HGV drivers and the public. Unless suitable designated areas are provided, the system could lead to trucks being parked on the public highway. Clarification is required concerning the assessment and availability of suitable holding areas for delivery HGVs. Detailed comments on access points that fall within WNC's jurisdiction are made above and so are not repeated here.	system to manage access to the sites are noted. The **OCTMP Revision A [REP1-145]**will be discussed in further detail at the meeting with WNC on 27 November 2025 and updates made to the OCTMP if required.
WNC 4.156	Outline Construction Traffic Management Plan (OCTMP): Worker Travel	Section 6.3 relates to a construction worker travel plan and notes one potential measure being "To increase knowledge of the public transport and/or Active Travel opportunities".	Walking, cycling and travel by public transport is not considered to provide a role in direct travel to the Scheme. The rural location of the

LIR Ref.	Topic Area	Summary	Applicant's Response
to 4.157		As noted previously, the TA does not confirm if bus services exist in the area which could make public transport a viable option for worker travel. The TA also does not review active travel options or the possible safety of walking and cycling along the narrow minor roads serving the Sites which in places are subject to the national speed limit or thresholds above 30mph. The extent to which the shuttle bus service will offset worker journeys has also been queried.	Scheme is such that direct access by workers is unlikely to play a significant role. The approach commits a strategy around use of shuttle buses connecting the Scheme, to key hubs such as hotels and travel hubs such as railway stations. The ability for workers to access hotels, or hubs by public transport will be outlined in the Travel Plan. Please also refer to the Applicant's response to reference 4.75 to 4.78, above.
WNC 4.158 to 4.161	Outline Construction Traffic Management Plan (OCTMP): Construction Traffic Routing (Non-Abnormal Loads)	HGV construction traffic will approach Green Hill A, A.2 and B from the east (A43). These are considered the most appropriate routes and avoids settlements. Whilst the AIL route for Green Hill BESS involves a route through Northampton and Cogenhoe village, it is acknowledged that all other HGV construction traffic accessing the BESS site will not pass through WNC's highway network and instead approach along Station Road (A45) from the north. Vehicles associated with contractor staff (non-HGV vehicles) will utilise a much wider variety of routes in order to access the various sites and compounds. Some vehicle tracking assessments on access routes is provided in the TA, but the TA/ES does not categorically confirm that all routes have been assessed and that tracking assessments are available to confirm the routes can safely accommodate construction and coincident use	Appendix C of the ES Appendixc 13.3: **Transport Assessment (Part 1 and 2) [APP-151** and **APP-152]** includes swept path analysis for each of the site accesses as well as select parts of the HGV routes, which were identified through site visits and a review the composition of traffic within the baseline traffic flows.

LIR Ref.	Topic Area	Summary	Applicant's Response
		by the public. Clarification would be useful also as to whether or not the route assessments have considered the type of public traffic that could be expected along the route; for example, can routes used by agricultural vehicles accommodate tractors towing trailers coincident with construction HGVs etc?	
WNC 4.162 to 4.163	Outline Construction Traffic Management Plan (OCTMP): Road Condition Surveys	There is potential for the extraordinary HGV construction traffic to have a detrimental impact of the condition of the public highway. The applicant has stated in the OCTMP that pre and post construction surveys will be undertaken to identify and rectify highways defects directly attributable to construction activities associated with the Scheme. Given the anticipated construction period (up to 17 months for Green Hill A), it will be necessary for the applicant to also commit to interim arrangements to deal with safety defects that cannot wait for a post construction survey to be completed. WNC are satisfied that a DCO Requirement for a site specific Construction Traffic Management Plan would enable further detail to be agreed on this point. This will include the exact scope of roads included. Regardless of the findings of a survey, any highway gully located 500 metres either side of each access shall require cleansing upon completion of construction use of each access. This will need to be included in the detailed Construction Traffic Management Plan	The comments are noted and the Applicant confirms provision of a detailed Construction Traffic Management Plan is secured by Requirement 15 of Schedule 2 to the **Draft DCO Revision A [REP1-008]**.
WNC 4.164 to 4.166	Outline Operational Traffic Management Plan	The main query from the perspective of the day-to-day operational access requirements is in relation to understanding which of the accesses / routes formed during the construction phase would be retained and used for the	Further details relating to which access points are required during the operational phase is provided in Table 4.1 of **ES Appendix 13.2:**

LIR Ref.	Topic Area	Summary	Applicant's Response
		operational period that spans across the period from the end of construction until the equipment replacement phase. It has been highlighted that some of the proposed Site accesses are located where driver visibility is less than design standard requirement and the ES states that in places *"Where hedgerows are within the visibility splays, hedgerows can be coppiced and maintained during the construction phase to 600mm rather than removed."* Presumably during the day-to-day operational activities banksmen would not be deployed and if the accesses are restored to pre-construction state the hedges will be allowed to grow back to full height. It is therefore unclear what accesses are used and how safe access and egress will be provided during the operational phase of the development.	**Transport Assessment Part 1 of 3 [APP-151]**. The peak use of the accesses will be during the construction phase and therefore maintenance of visibility splays through coppicing of hedges and temporary traffic management measures will be required. The measures for each access during the construction phase will be agreed with the local highway authority as part of the detailed design of the accesses and approval of the detailed Construction Traffic Management Plan. During the operational phase, the traffic generated will be minimal and infrequent as set out in Section 5.3 (paragraph 5.3.3) of the **ES Appendix 13.2: Transport Assessment (Part 1) [APP-151].** As such, it is not proposed to manage the operational traffic through temporary traffic management measures nor maintain hedgerow height to 600mm. The use of the accesses will be similar to the existing agricultural use during the operational phase.
WNC 4.167 to 4.169	Glint and Glare	The applicant has applied "industry standards" in assessing the scope of modelling and level of mitigation for the impacts of glint and glare on the highway network. For Green Hill A, A.2 and B, focus has been on the A43 only as	The Applicant acknowledges this comment and has assessed local roads which WNC finds appropriate to be included in the glint and glare assessment and is submitted at Deadline 2 as a **Glint and Glare Technical**

LIR Ref.	Topic Area	Summary	Applicant's Response
		local roads are excluded due to recommendations for reasons of lower traffic densities. Due to the position of Green Hill A and Green Hill B away from the A43 with buffer vegetation, there is no impact on this road. Green Hill A.2 abuts the A43 and has been assessed with mitigation considered. WNC accepts the conclusions of the report with regards to the A43. WNC questions the omission of all local roads from the glint and glare assessment. Whilst it is acknowledged that some local roads carry few numbers of vehicles, others carry more significant numbers. In the absence of formal guidance or policy on the subject, WNC is of the opinion that a robust approach should be taken in the interests of highway safety.	**Note [EX2/GH8.2.4]**. The assessment concluded that a 'low impact' may be classified towards the local roads, and therefore a minor non-significant effect may be classified.
WNC 4.170 to 4.175	Public Rights of Way (PRoW) and Permissive Paths Management Plan	The alignment of Footpath CW1 differs on the planning documents, compared to the legal alignment as recorded on the Definitive Map. This has been raised during previous consultation but has not been amended. This needs to be resolved. There is concern that the legal alignment of the footpath must be retained and protected during the development. In addition, the plans should be amended to reflect the legal alignment. WNC are content with the Outline Public Rights of Way and Permissive Paths Management Plan (ref APP/GH7.10). PROW impacted as follows: DF4 (site terminates at boundary), DT8, CT3, CT5, CT6, CW1, DG2. It is noted periods of closures required to PROW will be limited as far as possible and managed on site. The DCO provides that	The Applicant will prepare an update to the **Public Rights of Way Plan Revision A [AS-009]** at Deadline 3 as we have now been provided with the definitive map data layer. The **OPROWPPMP Revision A [REP1-147]** in paragraphs 3.2.7, 3.2.13 and 3.2.16 confirms that signage will be put in place to provide information such as timings and contact details in respect of temporary changes to a PRoW. Footpath DF4 is located to the north west of Green Hill A and is located outside of the Scheme boundary. The access to and from

LIR Ref.	Topic Area	Summary	Applicant's Response
		any temporary closures of the rights of way will be authorised by the SI (rather than the usual Temporary Traffic Regulation Order procedure managed by the Highway Authority). Please ensure these are adequately communicated to the public and notice given where possible. As stated in the management plan please inform the ROW officer and in addition Definitive Map Team defmap.ncc@westnorthants.gov.uk It is noted that no permanent diversions to PROW are proposed in West Northamptonshire. Footpath DF4 terminates at the boundary of the development site, measures must be put in place to ensure access via Boughton Road is retained. The provision of Permissive Paths within the development is acknowledged and supported by WNC. These do not however fall under the responsibility of the Local Authority and are provided by the land owner for the benefit of the public. *The images within this section have not been copied across from the original submission document*	Footpath DF4 to and from Boughton Road will be maintained.
WNC 4.176 to 4.177	Flood Risk, Drainage and Surface Water	Policy BN7 'Flood Risk' of the WNJCS requires development proposals to comply with a flood risk assessment and management requirements as set out in national policy and guidance and the West Northamptonshire Strategic Flood Risk Assessments to address current and future flood risks with appropriate climate change allowance. The policy requires a sequential approach to development to direct developments in areas	The Scheme has been designed in full accordance with Policy BN7 of the West Northamptonshire Joint Core Strategy, Policy ENV11 of the Local Plan Part 2 and national policy in the NPPF. The updated **FRADS Revision A [REP1-053]** submitted at Deadline 1, supported by the updated **ES Chapter 10: Hydrology Flood Risk and Drainage**

LIR Ref.	Topic Area	Summary	Applicant's Response
		at lowest probability of flooding unless a sequential and exception test requirements are met. Major applications must be accompanied by a Flood Risk Assessment and demonstrate there is no increased risk of flooding to existing properties and that the development is (or can be) made safe and shall seek to improve existing flood risk management. Policy ENV11 'Local Flood Risk Management' of the LPP2 reflects these aims further advising of the need for development in Daventry to comply with the relevant flood risk and surface water drainage documents for the area. Green Hill A, A2 and B are currently greenfield sites. Green Hill A, A2 and B lie within the Upper Nene catchment. Several Ordinary Watercourses, including a network of land drainage ditches, flow through the sites.	**Revision A [REP1-023]**, confirm that Green Hill A, A.2 and B lie within the Upper Nene catchment and are predominantly within Flood Zone 1. Narrow corridors of Flood Zones 2 and 3 are limited to existing field drains and ordinary watercourses, with all infrastructure located outside these areas. A sequential approach has therefore been applied, ensuring the development is directed to areas of lowest flood risk. Surface water will be managed through infiltration or restricted discharge to existing drains at greenfield rates, incorporating a 40 % climate-change allowance for rainfall. The drainage strategy demonstrates no increase in flood risk to existing properties and aligns with the objectives of Policies BN7 and ENV11.
WNC 4.178 to 4.183	Flood Risk, Drainage and Surface Water – Flood Risk	Flood risk to the sites is addressed through a site-wide Flood Risk Assessment and Drainage Strategy (Appendix 10.1 EN010170/APP/GH6.3.10.1), which is supported by individual site assessments. The relevant Site-Specific Assessments for WNC LLFA are: • a. Appendix 10.3 - Annex B: Flood Risk Assessment and Drainage Strategy – Green Hill A [EN010170/APP/6.3.10.3] • b. Appendix 10.4 – Annex C: Flood Risk Assessment and Drainage Strategy – Green Hill A.2 [EN010170/APP/6.3.10.4]	The **FRADS Revision A [REP1-053]** and supporting annexes for **Green Hill A [APP-100], Green Hill A.2 [APP-101]** and **Green Hill B [APP-102]** confirm that all development areas lie entirely within Flood Zone 1. Ordinary watercourses and field drains have been identified, with undeveloped buffer zones maintained in accordance with LLFA guidance. To verify localised flood risk, Manning's open-channel calculations were undertaken for each on-site drain using LiDAR data to calculate

LIR Ref.	Topic Area	Summary	Applicant's Response
		• c. Appendix 10.5 – Annex D: Flood Risk Assessment and Drainage Strategy – Green Hill B [EN010170/APP/6.3.10.5] Green Hill A, A.2 and B are entirely situated within Flood Zone 1 (with less than a 1 in 1000 annual probability of river or sea flooding). A network of land drainage ditches is located within Green Hill A. Flows within the ditches are expected to flow generally in a south-westerly direction based on local topography. All the land drains and ditches are ordinary watercourses and are therefore the responsibility of the riparian owner to maintain. There are no watercourses or land drains present within Green Hill A2. There is however a series of land drains in the vicinity of the site, with the closest land drain positioned adjacent to the north-western border of the site. Based on the local topography, flows within these ditches are expected to move in a south-westerly direction. All the land drains and ditches are ordinary watercourses and are therefore the responsibility of the riparian owner to maintain. There are no watercourses within Green Hill B. There are two land drainage ditches located within 200m of Green Hill B. Flows within the ditches are expected to flow in a south-westerly direction based on local topography. All the land drains and ditches are ordinary watercourses and are therefore the responsibility of the riparian owner to maintain.	conveyance capacity and 1% AEP + 36% climate-change water levels. This confirmed that flood extents remain confined to the ditch corridors and do not affect the developable areas. Surface water mapping shows isolated shallow flow paths within Green Hill A, A.2 and B, but no critical infrastructure is located within these areas. Panelled areas will remain permeable, and drainage for infrastructure zones will be designed to manage the 1 in 100-year + 40 % climate-change event through infiltration or restricted discharge at greenfield rates. The Scheme therefore complies with Policy BN7 of the West Northamptonshire Joint Core Strategy and the NPPF, ensuring that flood risk is not increased on or off site.

LIR Ref.	Topic Area	Summary	Applicant's Response
		It is noted that there are areas of high surface water flood risk across Green Hill A, A2 and B. Critical infrastructure should not be constructed in high (more than 3.3% chance each year) and medium (between 1% and 3.3% chance each year) surface water extents without appropriate mitigation.	
WNC 4.184 to 4.193	Flood Risk, Drainage and Surface Water – Development Proposals	For any surface water leaving site it should be demonstrated that the mechanisms proposed to manage the surface water are in compliance with the requirements of: DEFRA's Sustainable Drainage Systems Non Statutory Technical Standards, the relevant chapters of the NPPF, and the Northamptonshire Council Local Standards and Guidance for Surface Water Drainage (2017), in addition to any other relevant policy or guidance in place at the time of the DCO application and subsequent Discharge of Requirements applications. The scheme is proposed to have appropriate surface water drainage implemented in line with the Flood Risk Assessment (Appendix 10.1 [EN010170/APP/GH6.3.10.1]) and it is therefore expected that any local impacts would be mitigated. The detailed design of the surface water drainage scheme for Green Hill A, A2 and B will need to be submitted to and approved by West Northamptonshire Council, as part of a Discharge of Requirements application, to ensure it provides adequate mitigation. The Council note that the current proposals for Green Hill A, A2 and B are for panels and so it is expected that these areas will continue to drain as greenfield sites. Linear	The Scheme accords with the DEFRA Non-Statutory Technical Standards for SuDS, the NPPF and the Northamptonshire Local Standards and Guidance for Surface Water Drainage (2017). The **FRADS Revision A [REP1-053]** and supporting annexes for **Green Hill A [APP-100], Green Hill A.2 [APP-101]** and **Green Hill B [APP-102]** demonstrate that runoff from panelled areas will continue to drain as greenfield, while isolated impermeable infrastructure will discharge through linear infiltration or other SuDS features designed to limit flow to greenfield rates. All drainage systems will be designed for the 1 in 200-year event with appropriate climate-change allowance in line with Upper Nene catchment standards. Raised panels and permeable track construction ensure natural flow paths are maintained and that overland runoff remains dispersed rather than concentrated, avoiding erosion or siltation risks.

LIR Ref.	Topic Area	Summary	Applicant's Response
		infiltration trenches are proposed to drain any isolated infrastructure. Following the significant flooding to Northampton town centre in Easter 1998 improvements were made to the defences along the River Nene. To secure the level of protection afforded by the new defence, all new development in the Upper Nene catchment must be designed for a flood with a 0.5% probability (1 in 200 chance) occurring in any year, including an appropriate allowance for climate change. This includes design of mitigation for main river flooding and any surface water attenuation. This applies across the whole of the Upper Nene catchment including all branches and arms of the Nene, upstream of Billing Aquadrome, and all tributaries such as Wootton Brook, Dallington Brook and Bugbrooke Brook. The Outline Construction Environment Management Plan (OCEMP) [EN010170/APP/GH7.1] accompanying the DCO application describes water management measures to control surface water run-off and drain hardstanding and other structures during the construction, operation and decommissioning of the Scheme. This will form part of a Pollution Prevention Plan to be implemented for the Scheme. The proposals are for raised panels to ensure much of the site continues to respond as a greenfield site. Whilst the volume of water being shed from the site is not expected to alter greatly, there is a risk that this could be conveyed in concentrated pathways as a result of the panels, where	During construction, runoff and pollution control measures will be implemented through the **OCEMP Revision A [REP1-131]**, including the Pollution Prevention Plan and Construction Surface Water Management Plan. A minimum 9-metre undeveloped buffer to ordinary watercourses and an 8-metre buffer to Main Rivers will be maintained in accordance with EA and local policy. Although the **Draft DCO Revision A [REP1-008]** disapplies the need for Land Drainage Consent, equivalent control will be maintained through the DCO Requirement process, ensuring approval of all works to ordinary watercourses and confirmation that no diversions, culverts or obstructions proceed without LLFA agreement. This approach ensures the Scheme remains compliant with national and local drainage policy and maintains the existing standard of flood protection within the Upper Nene catchment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		currently a sheet flow is experienced. This poses the risk of increased erosion and siltation from site where previously none occurred, resulting in possibility of downstream blockages and increased flood risk. Where practical, runoff from equipment and access tracks will need to be directed to permeable SuDS features, such as gravel-filled trenches or similar passive drainage features appropriate to local conditions. The development proposals confirm that critical infrastructure will not be placed in areas at medium or high risk of surface water flooding and will not obstruct flood flows. It is proposed to maintain a minimum 8 metres buffer from all Main Rivers and Ordinary Watercourses in accordance with Environment Agency guidance. This buffer has been increased to 9 metres where required by local policy, including for Ordinary Watercourses within the jurisdiction West Northamptonshire Council. There are no Internal Drainage Board (IDB) watercourses within the site. Both the permanent and temporary works required for the installation of the infrastructure could interact with various watercourses along the route. It is noted that the DCO will disapply the need for Land Drainage Consent. However, irrespective of any planning permission, formal written consent should be sought via an equivalent mechanism (such as West Northamptonshire's future Byelaws or Discharge of Requirements) for:	

LIR Ref.	Topic Area	Summary	Applicant's Response
		(i) Any works to any non-main river watercourse that lies within West Northamptonshire Council's administrative boundaries. 'Ordinary watercourses' are the watercourses which are not maintained by the Environment Agency or by an Internal Drainage Board. (ii) (ii) Any diversion, culvert, weir, dam, or obstruction to the flow of any such watercourse. This requirement also includes potential temporary works	
WNC 4.194 to 4.195	Flood Risk, Drainage and Surface Water – Conclusion	The Council in its capacity as Lead Local Flood Authority (LLFA) has reviewed the application documents for this proposal. In terms of local flood risk and surface water drainage, the LLFA considers the assessment in 'ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy – Covering Report' to be reasonable, subject to: a. Green Hill A, A2 and B being developed as proposed within the DCO application documents. b. The outlined mitigation measures being implemented. c. Further surface drainage details being agreed as part of subsequent DCO requirements. d. Development proposals complying with relevant and current surface water drainage policy and guidance available at the time of the DCO application. Subject to the above, the Council is of the view that the impacts of this proposal would be neutral in respect of flood risk and drainage matters.	The Applicant welcomes the LLFA's conclusion that the assessment presented in the **FRADS Revision A [REP1-053]** is reasonable and that the overall impacts are neutral in respect of flood risk and drainage. The Scheme will be developed in accordance with the submitted DCO documents and will implement all mitigation measures set out in the **FRADS Revision A [REP1-053]** and supporting annexes **[APP-100** to **APP-108; REP1-055; REP1-057]**. Detailed surface-water drainage design will be agreed with the LLFA under the relevant DCO Requirement to ensure continued compliance with current national and local policy and guidance. With these controls in place, the Scheme will not increase flood risk on or off site and remains fully compliant with Policy

LIR Ref.	Topic Area	Summary	Applicant's Response
			BN7 of the West Northamptonshire Joint Core Strategy and the NPPF.
WNC 4.199 to 4.208	Cultural Heritage	The historic landscape is one of West Northamptonshire's most valued landscape assets. Post-medieval enclosure is a common field pattern type found across much of the rural landscape of Northamptonshire. The principal historic elements of the 'Earlier Parliamentary Enclosure' type of the Lamport-Moulton Uplands, within which sites A, A.2 & B of the proposed development lie, are fields with hedgerows laid down along straight boundaries, often (but not exclusively) in neat geometric patterns. The initial layout of large allotments was often quickly followed by individual farmers subdividing their land into medium sized fields and establishing farmsteads and houses away from the village in the middle of their private land. These farmsteads and fields were linked by a series of regular straight roads (Kathryn Hardcastle (2015) Northamptonshire Historic Landscape Character Assessment [data-set]. York: Archaeology Data Service [distributor] https://doi.org/10.5284/1032006). These features are still prevalent in the landscape of sites A, A.2 & B today and contribute positively to sense of place. Rural villages such as Old, Walgrave, Hannington and Holcot are set within a landscape of arable and pasture fields bordered by low hedgerows with limited hedgerow trees. There are many examples of isolated farmsteads surviving within this landscape. Hedgerows are generally intact and well maintained, with few gaps. They provide effective physical enclosure but, given their generally low height, field surfaces are often visible above them,	The Applicant agrees that where harmful impacts to the significance of heritage assets within the West Northamptonshire area have been identified, none are considered significant in EIA terms. The Applicant agrees that mitigation measures have been carefully considered and so are considered reasonable and proportionate. The Applicant considers the mitigation proposed has reduced harm where identified to the lowest achievable levels. The Applicant agrees that land within the Scheme is predominately characterised by post-medieval enclosure, which is common across much of the rural landscape of Northamptonshire. The principal element that contributes to the historic landscape character is the layout of field boundaries. As concluded in **ES Appendix 12.7 Historic Landscape Assessment [APP-147]** existing boundaries and hedgerows will be maintained, and all development will be reversible following decommissioning, with minimal residual landscape changes. The Applicant agrees that the Scheme would not alter the ability to understand the historic landscape character and the legibility of the

LIR Ref.	Topic Area	Summary	Applicant's Response
		especially where field levels are higher than the roads and footpaths. Policy BN5 (Historic Environment and Landscape) of the West Northamptonshire Joint Core Strategy requires development to sustain and enhance the heritage and landscape features which contribute to the character of the area and be sympathetic to locally distinctive landscape features in order to contribute to sense of place. The applicant's Historic Landscape Assessment at Appendix 12.7 of the Environmental Statement [APP-147] assigns a low level of impact on the character of the historic landscape as a result of the change in land use from agrarian to energy production for the duration of the proposed development. The Environmental Statement [APP-049] concludes that the removal of sections of hedgerow from field boundaries (many of which have been identified as historically important in terms of the Hedgerows Regulations 1997) during the construction phase would cause a low adverse magnitude of impact on the historic landscape character, which is not significant in EIA terms. It is stated that, where possible, removed hedgerows would be reinstated, meaning that these impacts would largely be of a temporary and reversible nature. It is considered that the proposed development would not alter the ability to understand the historic landscape character and the legibility of the historic landscape and field pattern would be maintained. It is therefore considered to cause less than substantial harm, at the lower end of the scale in NPPF terms.	historic landscape and field pattern would be maintained. As such the Scheme would cause a low level of impact on the overall character of the historic character, which is not considered significant in EIA terms. As detailed in Section 12.4 of **ES Chapter 12 Cultural Heritage [APP-049]** a comprehensive assessment methodology was followed to identify assets where there was a potential for harm which should be considered as part of the assessment. Appendix 1 of **ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]** details assets scoped in for assessment and was used during consultation with the West Northampton Conservation Officer. Scoped in assets are considered to be agreed. The non-designated New Lodge Farm, Walgrave (NHER ref 8961/2) is located immediately northwest of Kettering Road, to the north of Site A2. **ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]** acknowledges that the Scheme would introduce a new built form on fields 100m to the south of the farmstead and as such has the potential to reduce the historic significance of the asset as farmstead surrounded by agrarian land. The assessment identified the Scheme would result in less than substantial harm to the asset in NPPF terms, which the

LIR Ref.	Topic Area	Summary	Applicant's Response
		West Northamptonshire Council (WNC) acknowledges that the proposal is unlikely to result in large scale loss of the hedgerow resource and seeks to manage and reinforce existing hedgerows with native species. It is generally intended that the existing low hedgerows would be allowed to grow to a height of 4m. Proposed landscape mitigation is expected to reach maturity by Year 15 of the scheme. WNC considers that, despite the proposed mitigation measures, a project of this scale and nature in the proposed locations would result in harmful change to the historic character of the agricultural landscapes that surround and form the context of the rural settlements and isolated farmsteads. Only one historic farm complex has been identified by the applicant as a non-designated heritage asset and scoped into the heritage assessment (New Lodge Farm, Walgrave – see below) but other historic building groups would also be affected. The size of the proposed development sites and the extent of land that would be covered by solar panels would be significant in relation to the small size of the villages and farmsteads. For most of the designated and non-designated heritage assets within the West Northamptonshire area that were scoped in for further assessment the applicant's Heritage Statement [APP-110) concludes that there would be no harm to significance arising from any phase of the proposed development. This is typically as a result of distance from the site, presence of intervening topography and/or vegetation, and lack of intervisibility between the asset and the site. Section 12.7 of the Environmental Statement (APP-049) describes construction and	Applicant considers is outweighed by the public benefits of the Scheme. The grade II listed Overstone Old Rectory (NHLE 1075355), Rectory Farmhouse (NHLE 1025896) and The Old Farmhouse and Attached Stables (NHLE 1354758) are located to the south of Green Hill B. As stated in **ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]** they do not derive any particular significance from the site area, nor does it share any notable historical relationship with it. While there would be some alteration to the setting of the asset with new built forms on agricultural fields 250m away, the asset otherwise will maintain its agricultural setting to its north-west. Overall, the Scheme is assessed to cause no harm to the group of assets. Section 12.11 of **ES Chapter 12 Cultural Heritage [APP-049]** has assessed the cumulative impact of the scheme and residential developments to the east of Kettering Road. As stated in Paragraph 12.11.10 of **ES Chapter 12 Cultural Heritage [APP-049]** it can be noted that there is a potential for a change to the general wider agricultural nature of the landscape surrounding the group of Grade II Listed assets, wide areas of agricultural land will be retained and as such no significant cumulative effects were identified.

LIR Ref.	Topic Area	Summary	Applicant's Response
		operational mitigation measures that have been proposed to respond to the identified heritage and archaeological sensitivities, including: removing solar panels from some fields and providing offsets to protect the setting of assets; planting of shelter belts and scattered trees, minimising hedgerow removal and reinforcing existing or planting new hedgerows, and; design of construction traffic routes to limit the risk/extent of damage or disturbance to heritage assets. These measures appear to be reasonable and proportionate. Where harmful impacts to the significance of heritage assets within the West Northamptonshire area have been identified, none are considered significant in EIA terms. The applicant's Heritage Statement (APP-110) identifies harmful impacts for the following heritage assets: • Less than substantial harm, at the upper end of the scale, to the significance of Station Lodge, Castle Ashby (NHLE 129415; Grade II listed building) as a result of construction traffic during the construction phase of the Green Hill BESS. Station Lodge is a late 19th century building constructed in coursed squared limestone with limestone dressings and plain tile roof. It comprises a three-storey gatehouse with carriage arch and attached lodge. The building fronts the intersections of Station Road and Whiston Road. It is the former lodge to the Castle Ashby grounds, which is a Grade I Registered Park and Garden (NHLE 1000385). The park is focused on the Grade I Listed Castle Ashby house. The formal gardens are situated mainly to the east and north of the house. The assessment concludes	

LIR Ref.	Topic Area	Summary	Applicant's Response
		that there would be no harm to the setting of these heritage assets as a result of topography and the high level of screening provided by existing trees and hedgerows along Station Road. Station Lodge forms the northern-most asset within the Castle Ashby estate. The proposed development would introduce new built form on land approximately 250m to the east of Station Lodge. There is potential for noise and vibration impacts associated with the construction phase, which would result in less than substantial harm to the significance of the asset, at the higher end of the scale. During operation it is considered that any noise impacts of the scheme would be offset by the noise impact of vehicle traffic which is already prominent within the setting of the asset. Additionally, a bund is proposed to further reduce any residual noise impacts from the Scheme. It is considered that the operation of the scheme would result in no harm to the asset. • Less than substantial harm to the significance of White Lodge Farmhouse, Walgrave (NHLE 1203302; Grade II listed building). White Lodge Farmhouse dates from the early 18th century. It is a two-storey building with an l-shaped plan and is constructed in ashlar limestone and squared coursed lias with a slate roof. There are a number of ancillary farm buildings within its curtilage. The proposed development would introduce new built form on land to the west of the asset. The solar panels would be located within agricultural fields that have a relatively open aspect towards the asset, and from which the asset derives some significance. The	

LIR Ref.	Topic Area	Summary	Applicant's Response
		development has the potential to detract from the historic interests of the asset through material changes to its rural setting. Mitigation has been designed into the scheme, including removing solar panels from the field nearest to the asset and setting them back from other field boundaries, to reduce the visual impact. These measures are considered to have reduced the impact to less than substantial harm, which is assessed at the lower end of the scale. • Less than substantial harm to the significance of Farm buildings, New Lodge Farm, which is a non-designated heritage asset situated in open countryside within the parish of Walgrave. The buildings were constructed in the mid-19th century and are arranged in a three-sided courtyard plan. The assessment recognises that there is a historical relationship between the application site and the asset associated with its former use as farm buildings. The asset's significance would be eroded to a degree as a result of the change in land use from agricultural to solar panels within its setting. The assessment concludes that there would be no harm to the significance of a group of grade II listed heritage assets situated on the west side of the A43, Kettering Road, within the parish of Overstone. The group comprises Overstone Old Rectory, Rectory Farmhouse, and The Old Farmhouse and Attached Stables. The principal buildings date from the late 18th century and are constructed in squared coursed lias with slate roofs. Their siting within expansive open countryside away from the village of Overstone reflects a desire for seclusion and rural charm. The proposed	

LIR Ref.	Topic Area	Summary	Applicant's Response
		development would introduce solar panels into fields to the north of the assets, with new built form extending to within 250m. The assessment concludes that The Old Rectory does not derive any particular significance from the site area, nor does it share any notable historical relationship with it. Whilst there would be some alteration to the setting of the Old Rectory, its architectural prominence and historic relationships as a former rectory would remain. Additionally, the scheme would not impact the significance Rectory Farmhouse or the Old Farmhouse and Attached Stables derived from their association with the Old Rectory. Solar panels have been removed from Field BF5. The setting of the heritage assets has been affected by other largescale development within the local area, including approved (now partially constructed) and proposed urban extensions on the east side of Kettering Road, which are discussed at sections 12.11.6 – 12.11.10 of the Environmental Statement [APP-049]. Although the solar farm to the north of the assets would not be the main factor, it would compound the cumulative harm resulting from the incremental encroachment of built form and the loss of agricultural land and open countryside which is a key feature of the wider settings of the heritage assets. This impact is not restricted to those parts of a landscape that can be seen from, or have any specific invisibility with, the designated heritage assets. Although these identified harmful impacts on heritage assets as a result of development within their settings are considered not significant in EIA terms, even low-level harm to the significance of a designated heritage asset should be	

LIR Ref.	Topic Area	Summary	Applicant's Response
		given great weight in the planning assessment and would require clear and convincing justification. It should be demonstrated how the harm to the heritage assets has been reduced to the lowest achievable levels.	
WNC 4.209 to 4.214	Archaeology	The impacts on below ground archaeology from the construction phase are as discussed in ES Chapter 12, Cultural Heritage. There is some uncertainty as to the impacts of decommissioning (see below), but the ES CH chapter refers to fencing off archaeological preservation areas during decommissioning and the agreement of a Decommissioning Environmental Management Plan. The ES CH chapter refers to biodiversity enhancement measures so there may be additional impacts from those. There are numerous below ground heritage assets known from the HER (recorded as cropmarks) and from field evaluation as detailed in the Cultural Heritage chapter. I do not propose to list them here. The evaluation has largely been successful in identifying areas where mitigation (whether preservation in situ or preservation by record) will be needed. Some areas will require evaluation post-consent and this has been agreed and accepted by all parties, and is stated in the Archaeological Mitigation Strategy. There are two recorded WWII aeroplane crash sites in the vicinity of Mears Ashby but these are in areas which are being taken out of solar development according to the AMS.	As stated in Paragraph 12.4.34 of **ES Chapter 12 Cultural Heritage [APP-049]**, there is a degree of uncertainty regarding decommissioning. As stated in Paragraph 12.7.18 of **ES Chapter 12 Cultural Heritage [APP-049]**, a Decommissioning Environmental Management Plan will be agreed with the Archaeological Advisor to the relevant Local Planning Authority prior to decommissioning. Temporary fencing will be erected around 'no development' areas, which have been identified as requiring preservation in situ mitigation, and banksmen must be made aware of presence of archaeological remains. The Archaeological Mitigation Strategy (AMS) includes scope for archaeological monitoring where intrusive landscape and ecological mitigation is proposed in areas of low archaeological potential. As detailed in the **OLEMP Revision A [REP1-137]** indicative pond locations have been outlined on the Landscape and Ecology Mitigation Plans for Green Hill E, F and BESS **[APP-212 to APP-218, REP1-113** and **REP1-115].** These will be positioned to avoid

LIR Ref.	Topic Area	Summary	Applicant's Response
		Impacts of decommissioning are not understood at present and will depend to some extent on the techniques to be used. The CH chapter indicates that the impacts are expected to be in the same footprint as construction but this is uncertain as there is currently no precedent for techniques to remove solar panel piles after 60 years of use. We do not know what effects the soil chemistry will have and whether they will simply lift out of the ground, or whether they will need to be dug out – which will cause more damage. Research is being carried out and will inform future processes so the details of this will need to be provided at a later date – the decommissioning requirement includes the provision of a decommissioning plan. References to negligible effects on buried archaeology during decommissioning are unsupported by evidence. It will depend to some extent on the types of piles used; and having discussed this with the archaeological consultant there is willingness to investigate the various options to find those with the lowest potential impact on the archaeology. It is therefore likely that a variety of techniques will be used across the site depending on local conditions. <u>Archaeology comment on draft DCO Requirements</u> The archaeology requirement refers to the AMS which is acceptable and does state "No part of the authorised development may be commenced" which is suitably inclusive. Further details for the type of mitigation and piling will be decided once detailed design information is available post-consent, so a more detailed requirement for archaeology isn't possible at present.	archaeological remains. Where this is not possible archaeological mitigation in the form of strip, map and sample can be undertaken inline with the methodology provided in the AMS. The Applicant agrees that the archaeological evaluation has been successful in identifying concentrations of archaeological remains that require mitigation **[APP-121** to **APP-128**, **APP-139** to **APP-145**, **REP1-059** to **REP1-078]**. Where required appropriate mitigation is proposed. See Section 12.7 of ES **ES Chapter 12 Cultural Heritage [APP-049]** and the archaeological mitigation strategy provided in **ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146]**. As stated in Paragraph 12.4.37 of **ES Chapter 12 Cultural Heritage [APP-049]**, It is not envisaged that there would be any further impacts to buried archaeological remains beyond that experienced during the construction and operation phases. If works are required during the decommissioning phase of the Scheme, that have the potential to cause additional impacts to buried archaeological remains, an assessment would be required to ascertain the extent of impact

LIR Ref.	Topic Area	Summary	Applicant's Response
			and appropriate mitigation in line with the **ODS Revision A [REP1-135]**. Conversations are ongoing with the West Northamptonshire County Archaeologist about the different options for piling. The Applicant agrees that the AMS provides appropriate mitigation and archaeological impacts can be suitably managed by Requirement 12 of the **Draft DCO Revision A [REP1-008]**.
WNC 4.223 to 4.227	Ecology and Biodiversity – Mitigation	The project is reliant on a package of avoidance, mitigation and enhancement measures to address the ecological impacts. Therefore, the Applicant has prepared: • APP-545 GH7.1 Outline Construction Environmental Management Plan (oCEMP) • APP548 GH7.4 Outline Landscape and Ecological Management Plan (oLEMP) • APP549 GH7.5 Outline Ecological Protection and Mitigation Strategy • APP-547 GH7.3 Outline Decommissioning Statement (oDEMP). Measures proposed in the above documents will need to be secured in the DCO. GH 6.2.7 ES Chapter 27 Commitments Register (APP064) provides a helpful summary of the mitigation identified for the Project including	The Applicant notes this comment and agrees with the statements therein. The management plans referred are secured in the **Draft DCO Revision A [REP1-008]** by Requirements 13, 9, 8, and 21 respectively. The Applicant has engaged with NatureSpace to confirm utilisation of the DLL scheme and has submitted plans for assessment by NatureSpace. A District licence Report and Impact Plan will be produced by NatureSpace to accompany the DCO.

LIR Ref.	Topic Area	Summary	Applicant's Response
		embedded mitigation measures, which have been designed into the project. To mitigate for the impact on Great Crested Newts the applicant is planning to apply to have the scheme authorised under West Northamptonshire Council District Level Licensing (DLL) Scheme administered on behalf of West Northamptonshire Council by NatureSpace. Currently there is no report by NatureSpace accompanying the application that details that NatureSpace have assessed the application and shown that it can be accepted into the DLL scheme. As this is a NSIP there will need to be an appropriate mechanism, possibly through the DCO requirements, to allow for the WNC part of the scheme to be authorised under the DLL. The mitigation includes a number of Biodiversity Buffer Zones with Biodiversity Protection Fencing along the boundaries to this to prevent impacts on habitats with potential for or know presence of protected species e.g. badgers and bats, adjacent habitats to be retained including ditches, ponds, woodland, hedgerows, trees, grasslands which may also include non-statutory designated sites for example Local Wildlife Sites (LWS). Within WNC boundary there are two National Designated Sites SSSIs of Pitsford Water and Upper Nene Valley Gravel Pits, Environmental Statement Chapter 9 Ecology and Biodiversity appropriately assess the impacts in relation to the SSSI and WNC ecology agree with the conclusion. There are a number of non-statutory designated sites within the vicinity of the proposals with	

LIR Ref.	Topic Area	Summary	Applicant's Response
		Walgrave East Meadow Local Wildlife Site being locates directly adjacent to part of the red line on the Kettering Road as it exists Walgrave. The impacts on non-statutory designated sites have been appropriately assessed with appropriate mitigation to avoid impacts contained within the Environmental Statement Chapter 9 Ecology and Biodiversity and accompanying appendices. Within 10km of the proposal is the Upper Nene Valley Gravel Pits SPA, internationally important site designated for breeding and wintering bird populations, given the potential for impacts on the SPA and particularly Functionally Linked Land (FLL) components of the Upper Nene Valley Gravel Pits SPA and Ramsar site, a GH7.21 Habitats Regulation Assessment (HRA) report has been submitted (APP565) and concludes that there will be no adverse effects the integrity of the Upper Nene Valley Gravel Pits SPA and Ramsar site.	
WNC 4.228 to 4.234	Ecology and Biodiversity - BNG	Given the practical complexities of carrying out the wintering bird surveys across the proposed sites appendix 9.9 (APPGH6.3.9.9) details that it was agreed with between applicant and Natural England through there Discretionary Advise Service (DES) that a precautionary approach to the identification and assessment of potentially Functionally Linked Land (FLL) to the SPA would be taken. This approach appears sensible to ensure impacts on FLL and therefore the interest features of the SPA are minimised. Part of the scheme within WNC was assessed as being FLL which is to be lost, compensation has been agreed between the applicant and Natural England through there Discretionary Advise Service (DES) that damp pasture	The Applicant notes this comment and agrees with the statements therein. The Biodiversity Net Gain assessment which has been carried out includes all of the Sites within the Order Limits (Green Hill A-G & Green Hill BESS), and an additional BNG assessment has been completed which includes the Sites as well as the Cable Route Corridor. Both of these assessments are available in **ES Appendix 9.13 BNG Assessment (Revision A) [REP1-043]**. It is not intended for separate BNG assessments

LIR Ref.	Topic Area	Summary	Applicant's Response
		grassland would be the preference for compensation habitat. This is envisaged in the landscaping with the possibility of wader scrapes and crop rotation with arable or set aside. The Examining Body will need to satisfy itself that sufficient information has been submitted by the Applicant to enable this conclusion to be reached. Given the scale and nature of the proposed development the Council will expect the project to deliver at least 10% Biodiversity Net Gain (BNG). The Applicant has set out their approach to BNG in APP-046 GH6.2.9 and APP-096 Appendix 9.13 Biodiversity Net Gain Assessment. This document states at 1.11.2-5 that the project "will result in a significant net gain of biodiversity units". Based on an indicative landscape masterplan, the Scheme (excluding the cable routes) is calculated to result in a net gain of 70.68% for area-based habitat units, 18.55% for hedgerow units and 16.16% for watercourse units. This calculation will need to be updated when the final design of the site is confirmed. It is unclear across the authority if WNC will see a 10% biodiversity net gain as a result of scheme. This should be the aim as a minimum and it would be useful to understand if this is the case. The significant Biodiversity Net Gains that the applicant has detailed in the submissions is welcomed. This BNG delivery is in line with local plan policy and NPPF to deliver measurable net gains in Biodiversity. Despite not being mandatory for NSIPs the applicant has followed current	for each solar Site or each Local Authority area to be prepared, as ecological mitigation has been considered and implemented in the round across the entirety of the Scheme, rather than on a parcel-by-parcel basis. It is considered that this approach is in accordance with best practice BNG guidelines (as per the Statutory Biodiversity Metric User Guide (July 2025)). A minimum of 10% BNG is secured by Requirement 9 in Schedule 2 to the **Draft DCO Revision A [REP1-008]**.

LIR Ref.	Topic Area	Summary	Applicant's Response
		Biodiversity Net Gain methodology that applies to applicable developments in local planning authority regime. The Council welcomes the Applicant's commitment to delivering BNG and considers that these commitments will need to be secured with a specific requirement in the DCO. The Applicant will also need to demonstrate that the commitments made to delivering BNG are achievable, secured for the future, have appropriate monitoring and management and that it is demonstrably funded appropriately and sustainability. 4.234 There will be a requirement to legally secure the Biodiversity Net Gain and ecological mitigation/compensation sites to ensure they are secured in perpetuity.	
WNC 4.235	Ecology and Biodiversity - Comments on draft Development Consent Order (DCO) Requirements in respect of Ecology matters	The inclusion of the following requirements are welcomed; 7) Landscape and Ecological Management Plan – the requirement as currently drafted is acceptable, no comments. 8) Ecological Protection and Mitigation Strategy – the requirement as currently drafted is acceptable, The outline copy provided with the submission is as expected very brief the majority of the components that would be expected in a full final version of the document are present, however there is a need for some detail of the timing in relation to the removal of habitat and the provision of the compensatory habitat in particular where Functionally Linked Land is to be lost, this should not be removed until a suitable compensation area has been created at is at a considered favourable condition to support birds associated	Functionally Linked Land mitigation habitat will be delivered for the duration of the Scheme's operation. At this stage, it is not proposed to prepare mitigation land ahead of construction, as the land may not be under the control of the Applicant at this time. However, existing arable fields designated as mitigation will be suitable for foraging from the outset, and, where proposed to be seeded as pasture, this will occur within the first available seeding window (autumn or spring), and is likely to establish within a short period of time. Given that there is no net loss in the extent of FLL provision, the short time lag in the establishment of proposed pasture will not

LIR Ref.	Topic Area	Summary	Applicant's Response
		with the interest features of the Upper Nene Valley Gravel Pits SSSI/SPA. 9) Biodiversity Net Gain – the draft wording for this requirement is largely acceptable, however, recommend that the "biodiversity net gain strategy" and "metric" are defined as to what document is expected to be submitted and what it should include for example use of the Statutory Biodiversity Metric and Biodiversity Net Gain Strategy including as a minimum the information listed in section 7A of the TCPA. Currently the indicative landscape masterplan excluding the cable routes is calculated to result in net gains that significantly higher than 10% particularly for area based habitat units. Recommend that the requirement should detail more than 10% net gain with closer to the 70.68% for area-based habitat units, 18.55% for hedgerow units and 16.16% for watercourse units, e.g. 60%, 15% and 14% specified as a minimum to accommodate future changes to scheme design whilst maintain the high aspirations for biodiversity net gain within the scheme. 13) Construction Environmental Management Plan – the requirement as currently drafted is acceptable, the current outline Construction Environmental Management Plan is very brief and sufficient detail will be required when discharging the requirement pre-commencement. 14) Operational Environmental Management Plan– the requirement as currently drafted is acceptable, the current outline Operational Environmental Management Plan is	result in adverse effects on integrity of the SPA. With regards to the BNG assessment, whilst the Applicant aims to deliver as close to the calculated net gains as possible, **ES Appendix 9.13 BNG Assessment (Revision A) [REP1-043]** states that this assessment should be treated as indicative at this stage, given that the design of the Scheme still requires an element of flexibility (in accordance with **Section 4.3: Rochdale Envelope** of **ES Chapter 4 Scheme Description (Revision A) [REP1-031]**). It is intended for an updated BNG assessment and BNG strategy to be submitted post-consent, following the finalisation of the site layout and other elements of the Scheme. The outcomes of this updated assessment cannot be currently confirmed and therefore specific figures over 10% net gain cannot be committed to at this stage in the process. The Applicant requires a degree of flexibility in the wording of the BNG Requirement to allow for minor alterations to final BNG delivery figures, whilst ensuring that the aspirations of the submitted BNG assessment are secured and delivered. Notwithstanding the final calculation of BNG units, the Applicant has committed to

LIR Ref.	Topic Area	Summary	Applicant's Response
		very brief and sufficient detail will be required when discharging the requirement pre-commencement	delivering the measures set out in the **OLEMP Revision A [REP1-137].**
WNC 4.239 to 4.240	Construction and Decommissioning Noise and Vibration	Construction and decommissioning work will be by nature a noisy but is a time limited activity. However, it can have a significant impact on receptors close to where the work is taking place. Expected controls such as restricting operating hours, selecting lower noise techniques and plant will be outlined in the Construction Management Plan (CMP) that requires approval by the Local Planning Authority (LPA) through the Development Control Order (DCO). This is comparable to how other sites are developed and decommissioned. Communications with affected communities is also a key part of reducing local concerns and a local Communications Plan should be developed for this purpose, which outlines the working schedule, key noise controls in place and contacts. 14.8.11 BS 5228-2 indicates that impact or vibratory piling activities generally only generate vibration impacts when they are located less than 20m from sensitive locations. The impact depends on the type of piling, ground conditions, and receptor distance. Vibration from smaller scale push piling techniques, which are proposed be used for the installation of solar module mounting structures, are generally limited to 1mm/s for distances up to 10m. 14.8.12 Based on the distances between the Sites and surrounding receptors to locations where heavy ground works (excavation, push piling) may take place, it is considered that vibration from construction works experienced at sensitive receptors will be below the LOAEL and therefore limited to very low adverse magnitude impacts as per the	The Applicant notes these comments.

LIR Ref.	Topic Area	Summary	Applicant's Response
		criteria in Table 15-5. For receptors of high sensitivity this would be equivalent to a moderate effect, which is not significant. 14.8.13 Vibration levels from activities (including on-site works and construction HGV traffic) are anticipated to be below the level at which there is any potential for cosmetic damage to structures as per the criteria in Table 15.6 and as such is a negligible effect which is not significant. 14.8.14 It is considered that any periods of construction vibration experienced at a receptor would be unlikely to exceed one month, with no permanent residual effect once works are completed. As such, any construction vibration effects are considered to be short-term in duration.	
WNC 4.241 to 4.243	Construction and Decommissioning Traffic Noise and Vibration	The predicted noise level and resulting change in noise level because of traffic noise during this phase has been calculated. There is no perceptible change in noise levels at dwellings in our district close to land units A, A2 and B. Actual vibration levels from works are dependent on a number of factors including ground conditions, plant or vehicle size, the nature of the works (in particular piling methods), the speed of HGV movements and the quality of surface of haul or other temporary roads. Based on the assumed HGV speeds on access routes and regular maintenance of access route road surfaces, vibration from vehicles on the access roads will be minimised. Where heavy ground works (excavation, push piling) may take place, it has been calculated that vibration from construction works will be limited to very low adverse impacts. Vibration levels from activities (including on-site works and construction HGV traffic) are anticipated to be	The Applicant notes these comments.

LIR Ref.	Topic Area	Summary	Applicant's Response
		below the level at which there is any potential for cosmetic damage to structures. It has been stated that any periods of construction vibration experienced at a receptor would be unlikely to exceed one month, with no permanent residual effect once works are completed. As such, any construction vibration effects will be short-term in duration.	
WNC 4.244 to 4.247	Operational Noise and Vibration	The primary sources of noise from the scheme are the inverters and transformers serving the solar panels. The Council does have a concern with the approach adopted in that a lower threshold of 35dB has been used when assessing significance of impact. Background noise levels are as expected low given the rural nature of the area and the actual background noise level should therefore be used, not a set lower threshold. This needs further review. If the above is resolved, operational noise will not have a significant impact on receptors in the area as noise levels from the scheme are predicted to be below the existing background noise levels at the closest dwellings. In addition, agreed noise controls will be outlined in the Operational Noise Management Plan (ONMP) that requires approval by the LPA through the DCO. If the above is resolved, operational noise will not have a significant impact on receptors in the area as noise levels from the scheme are predicted to be below the existing background noise levels at the closest dwellings. In addition, agreed noise controls will be outlined in the	The assessment of operational noise effects has been undertaken according to the methodology set out in BS 4142. As outlined in the **ES Chapter 14: Noise and Vibration [APP-051]**. BS4142 also states that the following factors should be taken into account: *The absolute level of sound. For a given difference between the rating level and the background sound level, the magnitude of the overall impact might be greater for an acoustic environment where the residual sound level is high than for an acoustic environment where the residual sound level is low.* *Where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night.* The current BS4142 does not give any specific guidance on what might constitute a 'low' background noise level or rating level. It is

LIR Ref.	Topic Area	Summary	Applicant's Response
		Operational Noise Management Plan (ONMP) that requires approval by the LPA through the DCO.	therefore relevant to refer to other standards that provide absolute thresholds for suitable noise levels. BS 8233:2014 specifies 30 dB $L_{Aeq,T}$ as a suitable internal noise level in bedrooms in the night-time, for instance. In addition, the previous BS4142:1997 'Method for Rating industrial noise affecting mixed residential and industrial areas' states: *For the purposes of this standard, background noise levels below about 30 dB and rating levels below about 35 dB are considered to be very low.* The above levels are reiterated in the Association of Noise Consultants' (ANC) Technical Note on BS 4142:2014+A1:2019, stating: *BS 4142 does not define 'low' in the context of background sound levels nor rating levels. The note to the Scope of the 1997 version of BS 4142 defined very low background sound levels as being less than about 30 dB L_{A90}, and low rating levels as being less than about 35 dB $L_{Ar,Tr}$. The WG [ANC working group] suggest that similar values would not be unreasonable in the context of BS 4142, but that the assessor should make a judgement and justify it where appropriate.* In this case, it is therefore considered that where rating levels are 35 dB $L_{Ar,Tr}$ or lower,

LIR Ref.	Topic Area	Summary	Applicant's Response
			that they would fall into the No Observed Adverse Effect Level (NOAEL) as they would constitute 'very low' rating levels. Similarly, that 35 dB should be considered the relevant criteria to compare the calculated rating level against for other adverse effect levels when the background levels are below 35 dB $L_{A90,T}$.
WNC 4.248 to 4.249	Air Quality	There will be an expected increase in air pollution from on-site and off-site construction and decommissioning vehicle/plant emissions, because of increased particulates and deposited dust from activities on the sites, materials transportation, storage and handling, including the use of haul roads. The impact of this can be controlled, though not totally eliminated, by effective management and the use of low emission plant and equipment. This can be controlled via a Dust Management Plan (DMP), combined with the Construction Management Plan (CMP) all approved via the DCO. During the operational phase, outside of activities relating to the replacement of solar panels and batteries, routine activities at the sites will be minimal and consist of vegetation management, equipment maintenance and repair. During operation, there will therefore be a very limited impact on air quality.	The Applicant notes this comment. Best practice measures are included in the **OCEMP Revision A [REP1-131]**, secured by Requirement 13 of the **Draft DCO Revision A [REP1-008]**.
WNC 4.251	Land Contamination	No significant effects with respect to contamination or ground conditions have been identified.	The Applicant notes this comment.
WNC 4.252	Glint and Glare	Chapter 15 of the ES relates to the consideration of impacts of glint and glare in respect of the proposed development.	The Applicant acknowledges this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
to 4.255		The Council are in agreement with the list at 15.1.2 of Chapter 15 that identifies aspects that need to be considered in this regard including road users, residential properties, horse riders, cyclists and walkers and aviation activity at nearby airfields. In particular, there are a number of airfields within the vicinity of the site as set out within the ES and indicated below: <u>Green Hill A</u> Airfields Pitsford Airstrip lies approximately 4.4km southwest of Green Hill A. The airfields are private and unpaved. <u>Green Hill A.2</u> Airfields Hold Farm Airstrip lies approximately 500m southeast of Green Hill A.2. The airfield is private and unpaved. The larger, paved Sywell Aerodrome is located 3.7km south of Green Hill A.2. <u>Green Hill B</u> Airfields Hold Farm Airstrip lies approximately 1.9km northwest, Sywell Aerodrome lies approximately 2.5km east and Hold Farm Airstrip lies approximately 4.8km northeast of Green Hill B. Whilst the Council do not intend to comment in any detail on this aspect, the Council would request that due consideration is given to any potential adverse impacts on the continued and unfettered operation of these aviation facilities and on the users identified above. Impacts in	

LIR Ref.	Topic Area	Summary	Applicant's Response
		respect of glint and glare are also raised in paragraphs 4.169 to 4.171 in respect of highway matters.	
WNC 4.256 to 4.262	Agricultural Circumstances	Chapter 20 of the ES at paragraph 20.6.3 acknowledges that the application site comprises land that is principally farmed, with most of the land used for combinable crops (cereals with combinable break crops) with some of the land comprising grassland grazed by sheep and some for growing hay. Policy R2 of the WNJCS 'Rural Economy' supports proposals that sustain and enhance the rural economy by creating or safeguarding jobs and businesses where they are of an appropriate scale for their location, respect environmental quality and character of the rural area and protect the best and most versatile agricultural land and lists types of developments considered to be acceptable including schemes for farm diversification involving small-small scale business and commercial development that contributes to the operation and viability of the farm holding. Paragraph 20.6.4, Table 20.12, sets out the Landholding Baseline Information and provides details of the principle enterprises on site. *The images within this section have not been copied across from the original submission document.* The table indicates a high percentage of Best and Most Versatile agricultural land that would be unusable for the lifetime of the development which has proposed duration of 60 years. The extensive lifetime of the development and the	The Applicant noted the Council's comments and appreciated its agreement on the conclusion of **ES Chapter 20: Agricultural Circumstances [APP-057].**

LIR Ref.	Topic Area	Summary	Applicant's Response
		potential for associated impacts on food production for instance is considered to weigh against the proposal. Table 20.18 identifies a Moderate to Major beneficial effect on soil functions during the operational phase. Table 20.19 provides a summary of the Residual Effects for Agricultural Circumstances concluding that (with additional mitigation) there would be a Major (beneficial) Residual Effect in respect of ALC Grade 1, 2 and 3a land and Moderate (beneficial) for Grade 3b. This is acknowledged as a benefit of the proposal. In conclusion, whilst the conclusion of the ES chapter are agreed, the loss of BMV agricultural land for a 60 year period is considered a negative aspect.	
WNC 4.263	Cumulative Effects	The Council's comments in respect of cumulative impacts are set out in paragraphs 4.55 to 4.58 of the Landscape and Visual Impacts section of this report.	The Applicant notes this comment and has responded in LIR Ref. 4.55 to 4.58 above.
WNC 4.264 to 4.265	Conclusion	This LIR considers the potential impacts of the Green Hill Solar Farm in respect of the considered local impacts within the administrative boundary of West Northamptonshire Council. The Council respectfully reserves the right to comment further as necessary through Written Representations as the Examination progresses.	The Applicant notes the contents of this section of the LIR prepared by WNC and does not wish to provide additional comment at this stage.