GREEN HILL
SOLAR FARM

# Green Hill Solar Farm

## EN010170

# The Applicant's Responses to Deadline 1 Submissions

Prepared by: Lanpro Services

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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 Deadline 1 Submission

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# 1 Introduction

## 1.1 Purpose of the Document

1.1.1 This document provides Green Hill Solar Farm Limited's (the 'Applicant's') response to submissions made to the Planning Inspectorate (PINS) by 7 November 2025, relating to Examination Deadline 1 for the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').

1.1.2 This report primarily provides the Applicant's comments on responses to the Examining Authority's (ExA) first written questions, issued on 28 October 2025 **[PD-007]**, and to any written summaries of oral submissions to Issue Specific Hearing 1, held on 22 October 2025.

1.1.3 The Applicant's Response to Written Representations from Interested Parties have been responded to separately in **GH8.1.12 Applicant Response to Written Representations [EX2/GH8.1.12]**.

1.1.4 The Applicant's Response to Local Impact Reports from the host local authorities have been responded to separately in **GH8.1.13 Applicant Response to Local Impact Reports [EX2/GH8.1.13]**.

## 1.2 Structure of the Report

1.2.1 This document provides a response from the Applicant to the matters raised in those WRs and other documents received and is structured as follows:

- **Section 2** of this document sets out the responses from the host local authorities (Milton Keynes City Council, North Northamptonshire Council, and West Northamptonshire Council); and
- **Section 3** of this document sets out the responses from parish councils, parish meetings, or neighbourhood community groups.

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

1.2.3 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 2 to the Planning Inspectorate.

# 2 The Applicant's Comments on Response to the EXA's First Written Questions

## 2.1 North Northamptonshire Council

**Table 2.1:[REP1-172]**

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| NNC-001 | Q1.0.3 | Neighbourhood Plans<br><br>The Applicant's submitted Policy Compliance Document [APP-567] identifies two adopted Neighbourhood Plans (NP) (for Earls Barton and for Lavendon) relevant to the application. Can you confirm that these are the only two NPs which impact on the proposed development, or are there other adopted or emerging NPs which need to be considered as part of this examination? | I can confirm that in NNC administrative area, Earls Barton Neighbourhood Plan is the only one which the impact on the proposed development. There are no others which need to be considered as part of this examination. Mears Ashby has a 'Village Design Statement Supplementary Planning Document' (Adopted February 2017). This is of relevance. | The Applicant has considered the Earls Barton Neighbourhood Plan in the **Planning Statement Revision A [EX2/GH7.15_A]** and the **Policy Compliance Document Revision A [EX2/GH7.23_A].** |
| NNC-002 | Q1.0.5 | Cumulative developments<br><br>Do the local planning authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they please identify which cumulative developments have been omitted from which assessments and explain why they consider that they should be included. | No comment. NNC agree with those identified. | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | Q1.0.6 | Local Development Plans and Policies<br><br>If not in your Local Impact Report (LIR), all local planning authorities are asked to provide full copies of any Development Plan policies referred to in any of your submissions and to confirm the status of the relevant plan. Should you refer to any additional Development Plan policies which have not yet been provided at any time in your future submissions to the ExA, please also submit copies of these into the Examination. The ExA also requests to be kept up-to-date on changes to the status of any Development Plan which a Local Authority has previously relied upon during Examination. | These are provided in the LIR. | The Applicant notes this comment. |
| NNC-003 | Q1.0.7 | National and Local Planning Policies<br><br>The Policy Compliance Document [APP-567] assesses the proposed development against national and local policies. Are the local planning authorities content with the applicant's policy analysis? | We are content with the policy analysis. | The Applicant notes this comment. |
| NNC-004 | Q1.0.8 | Policy and guidance | No | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | Are you aware of any updates or changes to Government Policy or Guidance (including emerging policies) relevant to the determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications for the application? | | |
| NNC-005 | Q1.0.9 | Planning applications and consents<br><br>Please provide an update on any submitted planning applications or consents granted since the application was submitted which could either affect the proposed development or be affected by it, and whether these would affect the conclusions reached in the Environmental Statement. | No additional applications/consents granted since the application was submitted. | The Applicant notes this comment. |
| NNC-006 | Q1.0.10 | Committed developments<br><br>The applicant has provided Appendix 25.1 Long List of Committed Developments [APP-188] and Appendix 25.2 Short List of Committed Developments [APP-189]. Can the host local authorities confirm whether they are content with the list provided, or whether there are any further projects that they wish to add? Other interested | NNC had input into this list throughout the process. Nothing further to add. | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | parties, including Statutory Undertakers, are also invited to comment. | | |
| NNC-007 | Q1.0.12 | Potential Main Issues for Examination The Potential Main Issues for Examination document [APP-568] provides a summary of the principal areas of disagreement between the applicant and local planning authorities and consultees. Are all parties content with the summary of the position provided by the applicant and the principal areas of disagreement identified at time of submission of the application? | We are not content with the summary of the position provided by the applicant and the principal areas of disagreement identified at time of submission of the application. Landscape and visual impact is a principal area of disagreement as is cultural heritage (built). The likelihood of these two issues being resolved during the Examination are low. There is no mention of highway or transport matters that have been raised either, however these matters would be described as medium likelihood of being resolved during Examination. NNC's LIR describe the issues in more detail. | The matters recorded in the SoCG have been subject to discussion, through monthly catchups, between the Applicant and North Northamptonshire Council (NNC) as well as some topic specific meetings e.g. landscape and visual impact, and historic environment.<br><br>The Applicant is progressing a Statement of Common Ground with North Northamptonshire Council **[EX2/GH8.3.1]** with a draft submitted at deadline 2. |
| NNC-008 | Q1.0.13 | Legal Agreements<br><br>Can the applicant set out what consideration it has given to the need to develop a Section 106 | No discussions have taken place between the applicant and NNC regarding developing a s106 legal agreement. NNC consider | Please refer to the Applicant's response to comment 'NNC-085' in **The Applicants Response to the Relevant** |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | agreement with the host local authorities (HLA)? And, if the applicant feels there is a need for one, what are the topics and issues that the Section 106 Agreement should cover? Can the HLAs confirm their position on the matter, and whether any discussions or consideration have been given to this? | that the scheme needs a substantial financial mitigation package, to address the physical and environmental impacts and harms associated with the development and to support opportunities to address achieving carbon neutrality. Any associated legal agreement to secure community benefits will also need to address how the scheme will be decommissioned at the end of the Scheme lifetime, e.g. bonds, sinking funds etc to secure remediation. | **Representations [REP1-161]**.<br>To date, North Northamptonshire Council have not raised any specific financial mitigation packages that they consider are necessary. If they propose what they consider to be necessary, the Applicant will consider it.<br>The Applicant has committed to a community benefit fund and is open to discussing this further<br>The decommissioning activities are secured through Requirement 21 of Schedule 2 of the **Draft DCO Revision A [REP1-008].** |
| NNC-009 | Q12.0.4 | Conservation Area Character Appraisals The host local authorities are requested to provide the ExA with character appraisals, if available, for the four Conservation Areas scoped in to the applicant's assessment: | Easton Maudit Conservation Area (attached) and Mears Ashby Conservation Area (attached). Grendon Conservation Area does not currently have a character appraisal | The Applicant notes the Conservation Area Character Appraisals provided, which were used to inform the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]**, which is |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | • Castle Ashby Conservation Area;<br>• Easton Maudit Conservation Area;<br>• Grendon Conservation Area; and<br>• Mears Ashby Conservation Area. | | supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]**. |
| NNC-010 | Q16.0.2 | Planting Growth Rates<br>During ISH1, the applicant explained that, for the purposes of the assessments in relation to planting and visual screening, a uniformed growth rate of 0.4m per year, leading to a minimum height of 7.5m in 15 years had been applied. Is this a reasonable rate and are relevant parties content with this assumption? | This approach is considered broadly reasonable for assessment purposes, provided that it is supported by an appropriate planting specification and suitable long-term management plan. In practice, growth rates are species-dependent and will also vary according to local conditions such as soil conditions and growth competition. For example, faster growing pioneer species such as alder, willow, or birch can achieve or exceed 0.4 metres per year under favourable conditions, whereas slower-growing native species such as oak, field maple or holly may establish more | The Applicant notes this comment. Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the **OLEMP Revision A [REP1-137].**<br>The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the **draft DCO Revision A [REP1-008].**<br>Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | | gradually. The uniform rate therefore represents an average rather than a site-specific prediction. The Council is content with the use of this assumption on the basis that: • The Landscape and Ecology Management Plan (LEMP) defines species composition, planting densities, stock sizes, and management regimes suitable to the range of site conditions; • Monitoring and replacement planting is secured to address underperforming areas or slower-growing species; and Subject to these provisions being secured through the DCO Requirements and detailed LEMP, the Council considers the assumed growth rate to be acceptable and proportionate for the purposes of the landscape and visual assessment. | LVIA-11; EB-14; EB-15; and EB-16 of the **ES Chapter 27 Commitments Register [APP-064].** |
| NNC-011 | Q16.0.3 | Viewpoint and Photomontage Locations | The Council is satisfied that the viewpoints and photomontages provided to | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | Are you satisfied that the viewpoints and photomontages provided to date identify the key landscapes and viewpoints that are representative of sensitive visual receptors and that they identify appropriate visual receptors? If not, please indicate which other views or areas should be included in the viewpoints and photomontages and why. | date are appropriately located and provide an adequate and representative basis for assessing visual effects. | |
| NNC-012 | Q22.0.1 | Impact on sand and gravel allocation M2: Strixton – Bozeat<br><br>ES Chapter 11 [APP-048] identifies that Green Hill F would about the sand and gravel allocation M2: Strixton – Bozeat. As mitigation, the proposed development seeks to maintain vehicular access to the allocation and has been designed to retain a minimum 30 metre separation between the allocation boundary and the nearest solar panel. Do you have any concerns that this approach would be insufficient? | Yes, we are satisfied that the mitigation is sufficient on that site. | The Applicant notes this comment. |

## 2.2 Milton Keynes City Council

**Table 2.2: [REP1-170]**

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| MKCC-001 | Q1.0.3 | Neighbourhood Plans<br><br>The Applicant's submitted Policy Compliance Document [APP-567] identifies two adopted Neighbourhood Plans (NP) (for Earls Barton and for Lavendon) relevant to the application. Can you confirm that these are the only two NPs which impact on the proposed development, or are there other adopted or emerging NPs which need to be considered as part of this examination? | Lavendon Neighbourhood Plan (LNP) is the only relevant neighbourhood plan within the borough of Milton Keynes. The relevant policies of LNP are set out within MKCC's LIR. There are no other emerging Neighbourhood Plans which need to be considered. | The Applicant has considered the Lavendon Neighbourhood Plan in the **Planning Statement Revision A [EX2/GH7.15_A]** and the **Policy Compliance Document Revision A [EX2/GH7.23_A].** |
| MKCC-002 | Q1.0.5 | Cumulative developments | Agreed | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | Do the local planning authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they please identify which cumulative developments have been omitted from which assessments and explain why they consider that they should be included. | | |
| MKCC-003 | Q1.0.6 | Local Development Plans and Policies If not in your Local Impact Report (LIR), all local planning authorities are asked to provide full copies of any Development Plan policies referred to in any of your submissions and to confirm the status of the relevant plan. | Copies of relevant Development Plan policies are appended to the LIR. MKCC confirms they will update the Examining Authority (ExA) on any changes to the status of any Development Plan, particularly the emerging Milton Keynes City Plan, which is scheduled to commence its Regulation 19 consultation on 7 November 2025. | The Applicant notes this comment. The Applicant has updated the **Planning Statement Revision A [EX2/GH7.15_A]** and the **Policy Compliance Document Revision A [EX2/GH7.23_A].** |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | Should you refer to any additional Development Plan policies which have not yet been provided at any time in your future submissions to the ExA, please also submit copies of these into the Examination. The ExA also requests to be kept up-to-date on changes to the status of any Development Plan which a Local Authority has previously relied upon during Examination. | | |
| MKCC-004 | Q1.0.7 | National and Local Planning Policies<br><br>The Policy Compliance Document [APP-567] assesses the proposed development against national and | MKCC has no comments to make regarding analysis of the national policy listed in the Policy Compliance Document [APP-567]. The following paragraphs set out the consideration of Milton Keynes local policy. Table 13 Plan:MK (2019): The | The Applicant notes this comment. The Applicant has updated the **Planning Statement Revision A [EX2/GH7.15_A]** and the **Policy Compliance Document Revision A [EX2/GH7.23_A].** |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | local policies. Are the local planning authorities content with the applicant's policy analysis? | applicants have assessed all the relevant policies that MKCC have considered in its LIR. In general, it is considered to be an accurate policy analysis of the relevant policies in Plan:MK, subject to the specific comments in MKCC's LIR being taken into account, which relate to Policies CT2, NE2 and NE5 (transport, ecology and landscape). Table 14 Emerging MK City Plan (Regulation 18 version, 2024): It is noted that the applicant has thoroughly considered the Regulation 18 version of the emerging Milton Keynes City Plan, and it is considered to be an accurate policy assessment, subject to the specific comments in the LIR being taken into account, which relate to Policies GS10, CEA9, CEA10, CES12 (transport, ecology and landscape). The applicant and ExA should be aware that MKCC is due to | |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | commence consultation on the Regulation 19 version on 7th November 2025. Table 15 MK Minerals Local Plan (2017): This table contains an accurate assessment of local minerals policy. Table 16 MK Waste Development Plan Document (2008): This table contains an accurate assessment of local waste policy. Table 18 Lavendon Neighbourhood Plan (2020): The applicants have assessed all the relevant policies that MKCC have considered in its LIR. In general, it is considered to be an accurate policy analysis of the Lavendon Neighbourhood Plan, subject to the specific comments in MKCC's LIR being taken into account, which relate to Policies E2 and HT1 (ecology and transport). | |
| MKCC-005 | Q1.0.8 | Policy and guidance Are you aware of any updates or | MKCC is not aware of any updates or changes to government policy or | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | changes to Government Policy or Guidance (including emerging policies) relevant to the determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications for the application? | guidance relevant to the determination of this application. | |
| MKCC-006 | Q1.0.9 | Planning applications and consents<br><br>Please provide an update on any submitted planning applications or consents granted since the application was submitted which could either affect the proposed development or be affected by it, and whether these would affect the conclusions reached | There are no further planning applications or consents granted within the MKCC boundary which would either affect the proposed development or be affected by it. | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | in the Environmental Statement. | | |
| MKCC-007 | Q1.0.10 | Committed developments<br><br>The applicant has provided Appendix 25.1 Long List of Committed Developments [APP-188] and Appendix 25.2 Short List of Committed Developments [APP-189]. Can the host local authorities confirm whether they are content with the list provided, or whether there are any further projects that they wish to add? Other interested parties, including Statutory Undertakers, are also invited to comment. | The Milton Keynes section of Appendix 25.1 Long List of Committed Developments [APP 188] includes reference to the Wind Turbine Area of Search, Solar Farm Area of Search, and Policy CEA12 (Conserving and Enhancing Landscape Character/Special Landscape Areas) in the Regulation 18 version of the emerging Milton Keynes City Plan. The applicant and ExA should be aware that MKCC is due to commence consultation on the Regulation 19 version on 7 November 2025. However, there are minimal changes between the designations in the Regulation 18 and Regulation 19 versions of the emerging plan in this area. The only change of note is a reduction in the Wind Turbine Area of Search, which would not | The Applicant notes this comment.<br><br>The Applicant has provided 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 progress of the emerging Local Plan. The Applicant notes that the area of Site G remains within the Development Area for Solar in the updated Regulation 19 version of the emerging MK City Plan. The Applicant is proposing to submit a representation to the Regulation 19 consultation. The Applicant considers that the emerging Local plan carries limited weight given the stage it is at. Paragraph 49 of the National Planning Policy Framework states that<br><br>*"Local planning authorities may give weight to relevant policies in emerging plans according to:*<br><br>*a) the stage of preparation of the emerging plan (the more advanced* |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | | affect this proposal. In other respects, no committed developments within the borough are mentioned. This is due to the location of the site, to the rural north of the borough, and subsequently, the amount of surrounding development. This is considered accurate and has been agreed previously with the applicant. Recent development in the surrounding area tends to be minor, rural or agricultural in nature, and there are no significant major committed developments in proximity to Site G that are not already built or largely built out. | *its preparation, the greater the weight that may be given);*<br><br>*b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*<br><br>*c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)."*<br><br>Given that the emerging Local Plan has just commenced Regulation 19 consultation, once that stage has been completed MKCC will need to review comments and objections, confirm any changes to proposed policies based on those comments and then the draft Local Plan will need to be submitted for examination to consider its soundness. Therefore, the Applicant considers that it will be some time before the weight given to the emerging Local Plan changes. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| MKCC-008 | Q1.0.12 | Potential Main Issues for Examination<br><br>The Potential Main Issues for Examination document [APP-568] provides a summary of the principal areas of disagreement between the applicant and local planning authorities and consultees. Are all parties content with the summary of the position provided by the applicant and the principal areas of disagreement identified at time of submission of the application? | The potential main issues relevant to MKCC set out within Examination document [APP 568] include concerns relating to landscape and visual impact (specifically, the provision of additional viewpoints, and concerns over parcels GF9 and GF13), and ecology and biodiversity (relating to bats). As set out within the LIR, MKCC also raise minor concerns relating to transport and access (chapter 13 of ES) which are considered capable of being resolved during the examination process. The LIR sets out MKCC's views on all issues raised. Areas of agreement and disagreement will also be clearly set out within the Statement of Common Ground (SoCG) between MKCC and the applicant. | The matters recorded in the SoCG have been subject to discussion, through monthly catchups, between the Applicant and Milton Keynes City Council (MKCC) as well as some topic specific meetings e.g. landscape and visual impact, and historic environment.<br><br>The Applicant is progressing a Statement of Common Ground with Milton Keynes City Council **[EX2/GH8.3.3]** with a draft submitted at deadline 2.<br><br>A response relating to bats is provided in the **Applicant's Responses to Local Impact Reports [EX2/GH8.1.14]**, Item MKC-4.15.<br><br>See responses on transport and access matters covered under the Applicants response to the LIR reference MKC4.34 – 4.49. |
| MKCC-009 | Q1.0.13 | Legal Agreements<br><br>Can the applicant set out what consideration it has | To date, there have been no discussions relating to the need to develop a Section 106 agreement with MKCC. | The Biodiversity Net Gain is secured in Schedule 2, Requirement 7 of the **draft DCO Revision A [REP1-008]**. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | given to the need to develop a Section 106 agreement with the host local authorities (HLA)? And, if the applicant feels there is a need for one, what are the topics and issues that the Section 106 Agreement should cover? Can the HLAs confirm their position on the matter, and whether any discussions or consideration have been given to this? | MKCC would wish to ensure that a Biodiversity Net Gain is secured through an appropriate mechanism, and improvements to the access from the A428 (which is adopted highway). These may require a Section 106 agreement or other legal agreements. | The construction access and ay associated works are secured through the **Outline Construction Traffic Management Plan Revision A [REP1-145]** and Requirement 15 of the **draft DCO Revision A [REP1-008]**. |
| MKCC-010 | Q10.0.4 | Statement of Reasons and Land Plans<br><br>Are any APs or IPs aware of any inconsistencies in the Statement of Reasons [APP-019] or Land Plans [APP-007]? If so, please set out what these | MKCC are not aware of inconsistencies in the Statement of Reasons or Land Plans. | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | are and provide details. | | |
| | Q12.0.4 | Conservation Area Character Appraisals The host local authorities are requested to provide the ExA with character appraisals, if available, for the four Conservation Areas scoped in to the applicant's assessment:<br>• Castle Ashby Conservation Area;<br>• Easton Maudit Conservation Area;<br>• Grendon Conservation Area; and<br>• Mears Ashby Conservation Area. | The above Conservation Areas are not within the Milton Keynes boundary. | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| MKCC-011 | Q16.0.2 | Planting Growth Rates During ISH1, the applicant explained that, for the purposes of the assessments in relation to planting and visual screening, a uniformed growth rate of 0.4m per year, leading to a minimum height of 7.5m in 15 years had been applied. Is this a reasonable rate and are relevant parties content with this assumption? | The Council considers that the success of screening vegetation relies on several factors; speed of plant growth over time, maintenance regime including watering and mulching, exposure/shelter, climate change, increasing risks of future disease (with climate change). Any screening will not be instant and, due to several factors, cannot be relied upon to be permanent. Using a uniform rate of growth is therefore questionable. The rate of growth should be formally qualified by the applicant to ascertain the evidence it is based on. The rate needs to be evidenced and relevant to the specific location/situation (i.e. geology, soils, available ground water). It also needs to take into account the planting typology and species it is this being applied to, as well as the density and size and specification of planting. A | The LVIA recognises that the proposed landscape mitigation measures will take time to establish as set out within para 8.8.12 to 8.8.15 of the **LVIA [APP-045].**<br>In practice, growth rates are species-dependent and will vary according to local conditions such as soil conditions and growth competition. Under favourable conditions, faster growing native pioneer species are likely to achieve or exceed the proposed growth rates, whereas slower-growing native species may establish more gradually. The uniform rate therefore represents an average rather than a site-specific prediction.<br>Paragraph 20.7.4 of **ES Chapter 20: Agricultural Circumstances [APP-057**] states that "For areas of landscape planting or habitat creation, soil profiles to be created using available soil resources that support the required end use". This requires that both onsite available soil resources are re-used and that they are deemed capable of supporting the required end use. This requirement will |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | | uniform growth rate across all plating types and locations is not appropriate. In terms of the 15 year assumptions, the 7.5m doesn't appear to allow for pruning or management of planting, particularly formative pruning (e.g. cut back by half at planting) or take into account | therefore necessitate a coordinated approach to detailed landscape design between the project landscape architects and soil scientists ensuring that planting is designed to suit the available resources.<br>Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the **OLEMP [REP1-137].** This includes measures for the formative pruning and ongoing long term management of proposed and existing hedgerows, trees and woodland within the Scheme.<br>The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the **draft DCO Revision A [REP1-008**]. |
| MKCC-012 | Q16.0.3 | Viewpoint and Photomontage Locations<br>Are you satisfied that the viewpoints | MKCC is currently in discussion with the applicant regarding previously discussed viewpoint locations which have not been included, with a | The Applicant met with Officers from MKCC on the 6th of November 2025. No request for additional photography or photomontage was made by Officers during the course of this |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | and photomontages provided to date identify the key landscapes and viewpoints that are representative of sensitive visual receptors and that they identify appropriate visual receptors? If not, please indicate which other views or areas should be included in the viewpoints and photomontages and why. | meeting scheduled on 6 November 2025. We have requested additional viewpoints and photomontages looking towards SLA parcel GF13. An agreed viewpoint and photomontage further east than VP34 along the bridleway TP220 looking south towards GF13 should be provided. | meeting, nor has any request been included within the MKCC LIR.<br><br>In light of the above response, the Applicant acknowledges the request from MKCC to provide additional viewpoints and photomontages from the locations requested. The Applicant will work with Officers from MKCC to establish precise locations for each of the viewpoints prior to undertaking the exercise as requested.<br>The Applicant will undertake these viewpoints and will agree the locations with MKCC. Due to the time of year the winter photography will take place in December and the Applicant predicts that the photomontages will be available in January and will likely be submitted into examination at either deadline 4 or deadline 5. |
| MKCC-013 | Q22.0.1 | Impact on sand and gravel allocation M2: Strixton – Bozeat ES Chapter 11 [APP-048] identifies that Green | The above minerals allocation is not within the Milton Keynes boundary. | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | Hill F would abut the sand and gravel allocation M2: Strixton – Bozeat. As mitigation, the proposed development seeks to maintain vehicular access to the allocation and has been designed to retain a minimum 30 metre separation between the allocation boundary and the nearest solar panel. Do you have any concerns that this approach would be insufficient? | | |

## 2.3 West Northamptonshire Council

**Table 2.1: [REP1-174]**

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| WNC-001 | Q1.0.3 | Neighbourhood Plans<br><br>The Applicant's submitted Policy Compliance Document [APP-567] identifies two adopted Neighbourhood Plans (NP) (for Earls Barton and for Lavendon) relevant to the application. Can you confirm that these are the only two NPs which impact on the proposed development, or are there other adopted or emerging NPs which need to be considered as part of this examination? | Overstone Neighbourhood Plan (made 3 December 2021) and Moulton Neighbourhood Plan (made 2 December 2016) are situated to the south and south west of Green Hill B respectively but do not form part of the application site. | The Applicant has considered the Overstone Neighbourhood Plan in the **Planning Statement Revision A [EX2/GH7.15_A]** and the **Policy Compliance Document Revision A [EX2/GH7.23_A].** |
| WNC-002 | Q1.0.5 | Cumulative developments<br><br>Do the local planning authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they please identify which cumulative developments have been omitted from which assessments and explain why they consider that they should be included. | Agree. Please note however the Council are reviewing the list of Committed Developments as per Q1.0.10 below. | The Applicant notes this comment. If West Northamptonshire Council provide further information on this matter the Applicant will respond at the appropriate time. |
| WNC-003 | Q1.0.6 | Local Development Plans and Policies | Copies of relevant Local Development Plan Policies are attached to the LIR. Copies of any additional | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | If not in your Local Impact Report (LIR), all local planning authorities are asked to provide full copies of any Development Plan policies referred to in any of your submissions and to confirm the status of the relevant plan. Should you refer to any additional Development Plan policies which have not yet been provided at any time in your future submissions to the ExA, please also submit copies of these into the Examination. The ExA also requests to be kept up-to-date on changes to the status of any Development Plan which a Local Authority has previously relied upon during Examination. | policies referenced in any further written correspondence will be sent to the ExA accordingly. WNC confirms that they will provide any updates on changes to the status of the Emerging West Northamptonshire Local Plan. | |
| WNC-004 | Q1.0.7 | National and Local Planning Policies<br>The Policy Compliance Document [APP-567] assesses the proposed development against national and local policies. Are the local planning authorities content with the applicant's policy analysis? | Yes | The Applicant notes this comment. |
| WNC-005 | Q1.0.8 | Policy and guidance<br>Are you aware of any updates or changes to Government Policy or Guidance (including emerging policies) relevant to the | No | The Applicant notes this comment. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications for the application? | | |
| WNC-006 | Q1.0.10 | Committed developments The applicant has provided Appendix 25.1 Long List of Committed Developments [APP-188] and Appendix 25.2 Short List of Committed Developments [APP-189]. Can the host local authorities confirm whether they are content with the list provided, or whether there are any further projects that they wish to add? Other interested parties, including Statutory Undertakers, are also invited to comment. | The Council will discuss and review further with the Applicant. | The Applicant notes this comment. If West Northamptonshire Council provide further information on this matter the Applicant will respond at the appropriate time. |
| WNC-007 | Q1.0.12 | Potential Main Issues for Examination<br><br>The Potential Main Issues for Examination document [APP 568] provides a summary of the principal areas of disagreement between the applicant and local planning authorities and consultees. Are all parties content with the summary of the position provided by the applicant and the principal areas of | Yes, however, please note the comments contained within the LIR submitted by the Council upon further review of the submitted application. | The Applicant notes this comment and please refer to their response in **The Applicant's Response to Local Impact Report [EX2/GH8.1.14].** |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | disagreement identified at time of submission of the application? | | |
| WNC-008 | Q1.0.13 | Legal Agreements<br>Can the applicant set out what consideration it has given to the need to develop a Section 106 agreement with the host local authorities (HLA)? And, if the applicant feels there is a need for one, what are the topics and issues that the Section 106 Agreement should cover? Can the HLAs confirm their position on the matter, and whether any discussions or consideration have been given to this? | No discussions have taken place with the Applicant thus far. The Council will discuss the matter further with the Applicant. | The Applicant notes this comment. |
| WNC-009 | Q12.0.4 | Conservation Area Character Appraisals The host local authorities are requested to provide the ExA with character appraisals, if available, for the four Conservation Areas scoped in to the applicant's assessment:<br>• Castle Ashby Conservation Area;<br>• Easton Maudit Conservation Area; | Castle Ashby Conservation Area Appraisal and Management Plan – April 2015 and Map attached. | The Applicant notes the Conservation Area Character Appraisal provided, which was used to inform the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]**, which is supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]**. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
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| | | • Grendon Conservation Area; and<br>• Mears Ashby Conservation Area. | | |
| WNC-010 | Q16.0.2 | Planting Growth Rates During ISH1, the applicant explained that, for the purposes of the assessments in relation to planting and visual screening, a uniformed growth rate of 0.4m per year, leading to a minimum height of 7.5m in 15 years had been applied. Is this a reasonable rate and are relevant parties content with this assumption? | This approach is considered broadly reasonable for assessment purposes, provided that it is supported by an appropriate planting specification and suitable long-term management plan. In practice, growth rates are species-dependent and will also vary according to local conditions such as soil conditions and growth competition. For example, faster-growing pioneer species such as alder, willow, or birch can achieve or exceed 0.4 m per year under favourable conditions, whereas slower-growing native species such as oak, field maple or holly may establish more gradually. The uniform rate therefore represents an average rather than a site specific prediction. The Council is content with the use of this | The Applicant notes this comment. Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the **OLEMP Revision A [REP1-137].** The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the **draft DCO Revision A [EX1/GH3.1_A].** Commitments to delivery include EN010170 – LVIA-01; LVIA-02; LVIA-03; LVIA-11; EB-14; EB-15; and EB-16 of the **ES Chapter 27 Commitments Register [APP-064].** |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | assumption on the basis that:<br>• The Landscape and Ecology Management Plan (LEMP) defines species composition, planting densities, stock sizes, and management regimes suitable to the range of site conditions;<br>• Monitoring and replacement planting is secured to address underperforming areas or slower-growing species; and Subject to these provisions being secured through the DCO Requirements and detailed LEMP, the Council considers the assumed growth rate to be acceptable and proportionate for the purposes of the | |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | landscape and visual assessment. | |
| WNC-011 | Q16.0.3 | Viewpoint and Photomontage Locations Are you satisfied that the viewpoints and photomontages provided to date identify the key landscapes and viewpoints that are representative of sensitive visual receptors and that they identify appropriate visual receptors? If not, please indicate which other views or areas should be included in the viewpoints and photomontages and why. | We are satisfied that the viewpoints and photomontages provided to date are appropriately located and provide an adequate and representative basis for assessing visual effects. | The Applicant notes this comment. |

## 2.4 Environment Agency

**Table 2.4: [REP1-185]**

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| EA-001 | Q8.0.9 | Check valves and fire safety<br><br>The Environment Agency requests (RR-1224, EA/WQ/02) that it is made clear in the documents that any check valves would be closed automatically in the event of a battery system fire. The Outline Battery Storage Safety Management Plan [APP-551] at 5.3.2 Page 32 states that in the event of a fire a system of automatically self actuating valves would be closed and the Flood Risk Assessment and Drainage Strategy states the same [APP-103] at 2.8.3. Both of these documents would be secured by requirement and certified. Does this resolve the EA's concerns regarding the check valves? | Whilst we accept the use of "self-actuating valves" in principle, we require further information in the supporting documents of how they will operate. For example, will they be set in the close position when fire suppression systems are activated. There must also be safeguards to ensure there is a back-up option in case of a power failure, either with a manual close or a default shut position. | The Applicant agrees that the isolation valves serving the BESS drainage system must operate on a failsafe basis. The existing commitments in the **OBSSMP Revision A [REP1-143]** and the **Flood Risk Assessment and Drainage Strategy Revision A [REP1-053]** already secure automatic closure of the valves on activation of the fire detection system. The valves will also be specified at detailed design to default to the closed position in the event of power loss, with a manual means of isolation included. These requirements are already embedded in the certified documents and will be carried through into the detailed design secured under Requirement 11 which requires surface |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | | water and drainage details to be submitted and approved. Requirement 6 relates to battery safety management which requires a detailed battery safety management plan which must be in accordance with the **OBSSMP Revision A [REP1-143]** . |
| EA-002 | Q21.0.7 | Climate change allowance Tables 2 and 3 in appendix 10.1 of the Flood Risk Assessment [REP1-053] set out the climate change allowances applied to the FRA, including from the 2080s epoch. The climate allowances from the 2080s epoch would still be relevant to the to the assessment should the proposed development commence operation in 2029 and be decommissioned after a maximum 60 years in 2089. Please confirm that you are content with the climate change allowance epoch used given that proposed development is predicted to operate until 2089. | The applicant has used the correct climate change allowances in their assessment of flood risk to the development site. The applicant has used the higher central and upper allowances for the 2080s epoch. The 2080s epoch covers a period from 2070 to 2125 so is commensurate with the lifetime of the development. Many of the proposed solar panel areas (A through to G) are located within Flood Zone 1 or small areas of Flood Zone 2 and 3. In these locations the applicant has used the Environment Agency's Risk | The applicant welcomes agreement on the application of the climate change allowance guidance. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | of Flooding from Surface Water mapping as a proxy for fluvial flood risk but has also undertaken supplementary analysis calculating water levels using the Mannings open channel flow equation applying the 2080s epoch upper climate change allowance flows to determine water levels.<br><br>We consider this assessment reasonable and proportionate to the level of risk for the solar panel areas. In terms of the Battery Energy Storage System (BESS) as described within Appendix 10.11: Annex J – Flood Risk Assessment and Drainage Strategy – Green Hill BESS (APP-108), the applicant has undertaken detailed hydraulic modelling of the River Nene, Grendon Brook and tributaries, and the Field Drain which is an Ordinary Watercourse which runs through the BESS site. The | |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | application of climate change to these models reflects the 2080s epoch higher central and upper allowances and aligns with guidance. | |
| EA-003 | Q21.0.8 | Climate change allowance<br><br>Paragraph 2.4.1 of appendix 10.1 of the Flood Risk Assessment [REP1-053] references the EA's 'Flood Risk Assessments: Climate Change Allowances' guidance. Please confirm that you agree with the climate change allowance provided. | The Flood Risk Assessment Climate Change allowances guidance referenced in the Flood Risk Assessment available online at Flood risk assessments: climate change allowances - GOV.UK is the correct guidance to use. We agree that the applicant has used this guidance appropriately within their assessment. | The applicant welcomes agreement on the application of the climate change allowance guidance. |

## 2.5 Natural England

**Table 2.4: [REP1-181]**

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| NE-001 | Q8.0.5 | Habitat Creation<br><br>Natural England made representations concerning the quality and effectiveness of habitat creation intended to mitigate for the loss of functionally-linked land. Has Natural England reviewed the subsequent Outline Ecological Protection and Mitigation Strategy [APP-549], and does it have any further comments in this regard? | The Outline Ecological Protection and Mitigation Strategy has now been shared with Natural England. The OEPMS does not contain any information about the proposed mitigation for loss of functionally linked land. We advise that further information is required on the location of the mitigation areas, the habitat creation/establishment methodology, the timing/phasing of the habitat creation, a management plan for the lifetime of the development, and the monitoring strategy for the proposed FLL mitigation.<br><br>Section 11 of the OEPMS does set out a mitigation measure for the avoidance of disturbance impacts during the construction period. A watching brief will be in place to prevent | The **Habitats Regulations Assessment (Revision A) [REP1-153]** details the fields identified for mitigation of Functionally Linked Land (FLL), including their extent, location; current and proposed land use. 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 **Outline Landscape and Ecological Management Plan (Revision A) [REP1-137]**. Sections 4.6, 4.7 and 4.9 cover grassland, wetland (wader scrapes) and farmland habitats, which are proposed within the FLL fields.<br><br>Ecological monitoring proposed for the Scheme |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | disturbance during the months of November to February. Provided that this mitigation measure is adequately secured, this is appropriate. | post-construction include habitat surveys and a suite of bird surveys in order to assess the implementation of the proposed FLL mitigation and identify any remedial measures required. A full Landscape and Ecological Management Plan with further detail, including costing, will be prepared post-consent - this would be secured through Requirement 7 of the Draft Development Consent Order **[REP1-008**.<br><br>Measures prescribed in the **Outline Ecological Protection and Mitigation Strategy [REP1-139]** would be detailed in the full Ecological Protection and Mitigation Strategy, which would be prepared post-consent - this would be secured through Requirement 8 of the Draft Development Consent Order **[APP-017]**. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| NE-002 | Q9.0.3 | HRA sites and features<br><br>Are you satisfied that the correct sites and features have been identified in the applicant's HRA Report [APP-565]? | Natural England are satisfied that the correct sites and features have been identified. | The Applicant notes this comment. |
| NE-003 | Q9.0.7 | Ecological Protection and Mitigation Strategy<br><br>Relevant representation [RR-1242] states that you did not have access to the Ecological Protection and Mitigation Strategy [APP-549]. Please advise whether your concerns regarding mitigation set out in relevant representation [RR-1242] remain valid now that a redacted version of this document is available [AS-011]. Natural England: Do you have any concerns about the scope of monitoring being proposed? | Our concerns as set out in RR-1242 regarding mitigation for impacts to functionally linked land remain. Regarding the proposed scope of monitoring – there are no monitoring commitments relevant to our concerns within AS-011. Please see our answer to Q 8.0.5 for further detail. | The Applicant notes this comment and refers to the response to NE-001 above. |
| NE-004 | Q9.0.8 | Visual and noise disturbance<br><br>It is unclear whether the assessment of disturbance to designated species includes visual disturbance as well as noise disturbance within section 6.2 of the HRA Report [APP-565]. Please confirm whether you have any comments to this regard. | Our comments at Relevant Representations focused mainly on the survey effort and the quality and effectiveness of mitigation proposals. In reviewing the disturbance chapter of the HRA, it appears that visual (6.2.35) and noise (6.2.36) are both considered in terms | As stated in the **Habitats Regulations Assessment (Revision A) [REP1-153]**, in order for disturbance impacts to lead to a significant adverse effect on the integrity of the SPA, disturbance would have to cause significant numbers of golden plover or lapwing |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | of potential impacts to the SPA. However, there is less clarity when assessing the potential disturbance impacts to the qualifying features outside of the SPA in the following section (6.2.38 onwards).<br><br>We concur with the conclusion on potential impacts to the SPA sites. However, we advise that a more precautionary approach should be taken for the assessment on disturbance to the features using functionally linked land (Disturbance to Species Outside the SPA). The HRA currently concludes that any impacts to the qualifying features outside of the SPA are insignificant and gives four reasons for this:<br><br>1) The construction, replacement or decommissioning works is temporary in nature. | to be displaced and for this displacement to lead to continued stress (either physical or resource-based stress) and in turn the reduced ecological fitness of these species, ultimately leading to a decline in the sustainability of their population.<br><br>Typically, golden plover and lapwing have a patchy distribution over winter as these birds move around extensively to utilise different foraging areas. As alluded to by Natural England, the only potential risk of disturbance having a significant adverse effect on integrity of the SPA would be disturbance of notable numbers of birds within frequently used fields, i.e. FLL/ FLL mitigation fields.<br><br>The **Outline Landscape and Ecological Management Plan (Revision A) [REP1-137]** will be updated to confirm |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | 2) The distribution of the qualifying features is patchy.<br><br>3) There are alternative areas available for the birds to use if disturbed.<br><br>4) Birds habituate to noise and visual disturbance.<br><br>We do not believe this is an accurate or precautionary assessment of impacts to the qualifying features and address each point below:<br>1) The impacts are temporary in nature, but this is a landscape-scale project and there is no detail provided about the phasing of construction. There is little detail or specificity regarding the length of time that field parcels would be subject to construction. Bird species can be site loyal and there is the chance for a construction period of a few weeks to render a valuable site unusable by the bird species.<br><br>2) The rest HRA has been conducted on a | that the FLL mitigation areas will be available for birds prior to the commencement of development on the adjacent fields. Where temporary cabling works are required across FLL mitigation fields, this will adhere to pre-works inspections as per Method Statement 11 of the **Outline Ecological Protection and Mitigation Strategy [REP1-139].**<br><br>As the FLL mitigation fields would be secured from the outset of development, this means that alternative foraging areas would be available to displaced birds. Mitigation fields would be protected from direct disturbance by being closed to construction personnel. However, it is acknowledged that birds within FLL mitigation fields may be disturbed by noise and visual disturbance associated with |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | precautionary basis because a number of field parcels were not surveyed. Where there has been inadequate survey it has been assumed that the fields have the potential to support the qualifying features. Stating that the distribution is patchy implies that disturbance impacts are unlikely, but this has not been evidenced and is not in line with the approach to the HRA.<br><br>3) Ensuring that there are available refuges or undisturbed habitats for the birds to use is a viable mitigation measure. But there is no evidence provided to demonstrate there would be a wide variety of available sites for birds to use if they are disturbed. Works are likely to be happening across multiple fields at once at a landscape scale. Further information should be provided on the phasing of | construction in adjacent fields. The Applicant will look to discuss any practicable and proportionate additional mitigation measures with Natural England as part of the progression of the Statement of Common Ground. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | the construction and mitigation areas.<br><br>4) While there is evidence that birds habituate to noise and visual disturbance in certain habitats, the construction of a solar installation is unlikely to be something the birds have habituated to.<br><br>We disagree with the conclusion that disturbance impacts to functionally linked land is not significant. If the proposed mitigation for avoiding direct disturbance impacts provided in OEPMS section 11 was extended to cover the adjacent fields which might be subject to noise/visual disturbance, we would agree that there would be no adverse impacts to the designated sites. Alternatively, if the mitigation areas have been secured then the potential construction disturbance effects would have already been mitigated (provided the mitigation areas are not | |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | subject to construction disturbance). | |
| NE-005 | Q9.0.9 | Invasive and non-native species (INNS)<br><br>Paragraph 6.3.6 of the HRA Report [APP-565] states that due to the lack of major development to watercourses upstream of the SPA, the spread of invasive non-native species (INNS) is unlikely to be compounded by other developments and no in-combination effects from this impact pathway are likely. Please confirm whether you agree that the spread of INNS is not considered in Stage 2 in combination assessment. | Paragraph 6.3.6 discusses surface water runoff. It is assumed that this question is meant to refer to paragraph 6.3.5. If so, Natural England agree that the spread of INNS does not need to be considered at the Stage 2 in-combination assessment. | The Applicant notes this comment. |
| NE-006 | Q9.0.10 | Conservation objectives and condition assessment Paragraph 5.2.26 of the HRA Report [APP-565] states that no current information on the conservation measures for the Upper Nene Valley Gravel Pits Ramsar site is available and a formal management plan has not been prepared. However, the HRA Report does provide a list of measures that have been proposed to address current impacts to the Upper Nene Valley Gravel Pits | Natural England require clarity on the above question, please. Paragraph 5.2.26 states that there is no current information on 'conservation measures'. The conservation measures are set out in the Site Improvement Plan for the Upper Nene Valley Gravel Pits: UK9020296. These can be found at the Natural England Publications | The Applicant acknowledges clarification of the conservation objectives, which could not be located at the time of writing. Nonetheless, the **Habitats Regulations Assessment (Revision A) [REP1-153]** considers and assesses all impact pathways which could affect these conservation objectives. If necessary, |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | Ramsar site. No information on the current condition of the Upper Nene Valley Gravel Pits Ramsar has been provided. Paragraph 5.2.27 states that "no current condition information was available".<br><br>Please confirm:<br><br>a) what conservation objectives should be used for the assessment of the Upper Nene Valley Gravel Pits Ramsar site.<br><br>b) whether the Upper Nene Valley Gravel Pits SPA condition assessment also applies to the Ramsar site. | website. The conservation objectives are as follows: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;<br><br>I. The extent and distribution of the habitats of the qualifying features<br><br>II. The structure and function of the habitats of the qualifying features<br><br>III. The supporting processes on which the habitats of the qualifying features rely<br><br>IV. The population of each of the qualifying features, and | the HRA can be amended to add the conservation objectives into Paragraph 5.5.26. |

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| | | | V. The distribution of the qualifying features within the site.<br><br>b) Yes, the condition assessment also applies to the Ramsar site. | |

## 2.6 National Grid Electricity Transmission PLC

**Table 2.4: [REP1-176]**

| Reference | ExA FWQ's | Question | Response | Applicants Comment |
|---|---|---|---|---|
| NGET-001 | Q1.0.1 | Grid Connection Statement<br><br>The applicant's Grid Connection Statement [APP-557] sets out the position regarding connection agreements and other matters. Could you confirm that everything is accurate within that document as it pertains to your organisation? | NGET confirms that it has reviewed the applicant's Grid Connection Statement [APP-557] and has no comment in relation to its content. | The Applicant notes this comment. |

# 3 The Applicant's Responses to Stop Green Hill Solar Deadline 1 Submissions

## 3.1 Stop Green Hill Solar (SGHS)

**Table 3.1: REP1-192**

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
|---|---|---|---|---|
| **Engineering Report: Assessment of Surface Water Runoff from Proposed Green Hill Solar Farm (Green Hill G) [REP1-215]** | | | | |
| SGHS-001 | Hydrology and Flood Risk | Hydrological Impact | The proposed site for the Green Hill Solar Farm that forms the basis of this report is Green Hill G in relation to the Village of Lavendon is as follows:<br><br>The construction of a ground-mounted solar farm alters the natural hydrologic cycle of a site. A vegetated, permeable surface, such as agricultural land or pasture, allows for the natural infiltration of rainfall into the soil, replenishing groundwater and slowing down surface flow. The presence of a solar farm introduces two primary changes:<br><br>• Impervious Surfaces: While the land between and under the panels may remain permeable, the panels themselves are an impervious surface. Rainwater that falls on the panels is no longer able to infiltrate directly below them. Instead, it is collected and channelled off the panels' surface.<br><br>• Concentrated Flow: Rainfall that would have been distributed evenly over the land is now channelled to the bottom | The suggestion that the solar panels will create harmful concentrated flow is not supported by the evidence or by national policy. Modern solar arrays are designed with drip gaps between modules which break up and diffuse runoff along the length of each row. Rainfall shed from the panels therefore reaches the ground as a distributed dripline rather than a continuous concentrated discharge. Cook and McEwan's *Hydrologic Response of Solar Farms* confirms that, where vegetation is maintained, dripline infiltration occurs immediately below the panels and does not result in increased flow velocity, rilling or gullying at field scale.<br><br>Paragraph 3.10.75 of NPS EN-3 reflects this position by confirming that solar PV panels drain to the existing permeable ground surface and that drainage impacts are generally not significant. The **Flood Risk Assessment and Drainage Strategy Revision A [REP1-** |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
|---|---|---|---|---|
| | | | edge of the panels. This concentrates water into a narrow strip of land, increasing the velocity and volume of flow in specific areas. This can lead to the formation of rills and gullies, causing soil erosion. | **053]** applies the same approach, assuming greenfield infiltration beneath and between the panel rows. The only mechanism by which concentrated flow could occur is through construction-related soil compaction, and this is managed and remediated through the **Outline Construction Environmental Management Plan Revision A [REP1-146]** and the **Outline Soil Management Plan [APP-550]**.<br><br>Once the ground is reinstated and vegetation re-established, the panelled areas behave hydrologically as permeable agricultural land and do not generate concentrated runoff. |
| SGHS-002 | Hydrology and Flood Risk | Soil Conditions and Moisture | The replacement of a permeable surface with an essentially impervious surface (the panels) fundamentally alters the pre-development hydrological balance. Even with the land between panels remaining pervious, the concentrated runoff from the panels themselves can overwhelm the infiltration capacity of the ground below, leading to increased peak flows and potential for localised flooding. | See response to SGHS-001 above. |
| SGHS-003 | Hydrology and Flood Risk | Quantification of Runoff Increase | Developer's Reports supporting large PV projects usually focus on overall flood risk and water resource models | The Applicant has identified areas within the Order Limits that require more detailed assessment and these have |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
|---|---|---|---|---|
| | | | but rarely look closely at particular parts of a site that may need different or more detailed assessment to get a true picture of local conditions.<br><br>Determining the exact percentage increase in runoff contribution can be complex but feasible using established hydrological models. Method for this include the use of the simplified Rational Method, the Wallingford Procedure or the Natural Resources Conservation Service (NRCS) Curve Number (CN) method, all of which are widely accepted models for estimating direct runoff from rainfall. | been appraised using the methodologies agreed with the Lead Local Flood Authorities and the Environment Agency. The **Flood Risk Assessment and Drainage Strategy Revision A [REP1-053]** sets out the approach for each development parcel and includes detailed hydraulic assessments where required, such as **Annex D: Green Hill B [APP-389]**, **Annex F: Green Hill D [APP-391]** and **Annex J: Green Hill BESS [REP1-058]**.<br><br>The runoff estimation tools suggested, such as the Rational Method or NRCS Curve Number, are not appropriate for large, mixed-use agricultural sites and are not used by the Environment Agency or LLFAs for this type of development. Instead, the FRA applies the accepted greenfield runoff calculation methods and site-specific hydraulic design that these authorities request for solar schemes.<br><br>Paragraph 3.10.75 of NPS EN-3 confirms that solar PV panels drain to the existing ground and that hydrological impacts are not generally significant when ground conditions are reinstated. The governing hydrological risk is temporary soil compaction during |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | construction, which is addressed through the **Outline Construction Environmental Management Plan [REP1-146]** and the **Outline Soil Management Plan [APP-550]**. The assessment therefore reflects both national policy and locally agreed methodology. |
| SGHS-004 | Hydrology and Flood Risk | GH7.16 – Design Approach Document<br>*Please refer to document for reference text* | 3.9.1 - Use of terms "mostly" and "limited areas" are not terms used without clarification or definition and should not be used as a blanket statement in order to avoid potentially necessary investigations. | The terms "mostly" and "limited areas" in section 3.9.1 of the **Design Approach Document [APP-560]** refer directly to the Environment Agency's mapped Flood Zones, which are spatially defined and shown in the **Flood Risk Assessment and Drainage Strategy Revision A Revision A [REP1-053]** and its annexes. The FRA identifies the exact locations where Flood Zones 2 and 3 intersect the Order Limits and those areas have already been assessed using methodologies agreed with the Lead Local Flood Authorities and the Environment Agency. The terminology in the Design Approach Document is therefore a reflection of mapped flood extents, not a generalised or unqualified statement. |
| SGHS-005 | Hydrology and Flood Risk | GH7.22 – Water Framework | 2.3.4 – 2.3.6 - There are contradictory statements contained in later reports concerning information in the Anglian | Sections 2.3.4 to 2.3.6 of the **Water Framework Directive Assessment [APP-566]** summarise the strategic objectives of the Anglian River Basin |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | Directive Assessment<br>*Please refer to document for reference text* | River Basin District Flood Risk Management Plan 2021 to 2027. | District Flood Risk Management Plan 2021 to 2027. The later reports cited by the representor do not contradict this information. They provide site specific flood risk assessment, including hydraulic modelling and surface water drainage design, within the **Flood Risk Assessment and Drainage Strategy Revision A [REP1-053]** and its parcel annexes. These documents apply the strategic requirements of the FRMP at a project scale, including the principles of avoiding increased flood risk, maintaining natural flow routes and safeguarding water quality.<br>The strategic FRMP content and the site specific FRA content serve different purposes and are consistent. The Scheme design achieves the FRMP objectives by maintaining greenfield runoff rates, protecting soil structure during construction through the **Outline Construction Environmental Management Plan Revision A [REP1-146]**, and ensuring no increase in flood risk elsewhere. |
| SGHS-006 | Hydrology and Flood Risk | GH7.22 – Water Framework Directive Assessment | 5.2.8 - The majority of the catchment is not representative of Green Hill G.<br>5.3.4 - Nearby alternative rainfall monitoring stations have monthly | Sections 5.2.8, 5.3.4, 5.4.15 and 5.6.1 of the **Water Framework Directive Assessment [APP-566]** provide catchment scale information for the receiving water bodies. This material is |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | *Please refer to document for reference text* | precipitation records dating back to 1900.<br><br>5.4.15/16 - Geological reports based on 1:50,000 scale cannot be used for the resolution required for any study.<br><br>No physical survey of the geology in field G-13 has been completed, and the local geology does not correspond to the blanket statement included in this clause.<br><br>5.6.1 - This contradicts information contained in later reports for Green Hill G and seems to be omitted or downplayed. | not intended to represent the hydrology or geology of individual fields and is not used for any runoff calculations or flood risk assessment for Green Hill G. Site specific hydrology is assessed in full within the **Flood Risk Assessment and Drainage Strategy Revision A [REP1-053]** and its annexes.<br><br>The statement that the wider catchment is "not representative" of Green Hill G does not affect the assessment because the WFD baseline is catchment based, while the FRA uses local topography, FEH design rainfall, hydrological soil classifications and BGS geological mapping to derive site level infiltration and greenfield runoff rates. These are the datasets required by the Environment Agency and the LLFAs. Local rainfall gauges, even where long records exist, cannot replace FEH design rainfall because they do not reflect the extreme events required for design storm assessment.<br><br>The use of 1:50,000 BGS mapping is standard practice for flood risk work. Localised observations of soil depth or isolated geological exposure cannot be extrapolated to a full hydrological unit and are not needed for greenfield runoff estimation. The FRA confirms that the |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Scheme does not alter infiltration pathways or introduce new impermeable surfaces across panelled areas.<br><br>There is no contradiction between the WFD Assessment and the Green Hill G FRA annex. The WFD Assessment provides high level catchment context only, while the FRA provides the detailed site specific assessment. Both documents reach the same conclusion that the Scheme will not increase runoff or adversely affect downstream water bodies. |
| SGHS-007 | Hydrology and Flood Risk | GH7.22 – Water Framework Directive Assessment<br><br>*Please refer to document for reference text* | 7.1.2 (Table 7)<br><br><u>Construction</u><br><br>Acknowledgement that impermeable area will increase, there is a risk of uncontrolled runoff, overloading existing land drainage systems.<br><br>Acknowledgement that there will be increased impermeable area (not included in Green Hill G report).<br><br>Cannot make a blanket statement "assessed to be negligible" without evidence.<br><br><u>Operational</u> | Table 7 of the **Water Framework Directive Assessment [APP-566]** summarises generic pressures that could arise during construction and operation for the purpose of screening WFD compliance. It does not state that the Scheme will introduce new impermeable area across the panelled fields and it does not override or contradict the findings of the **Flood Risk Assessment and Drainage Strategy Revision A [REP1-053]** or the parcel specific FRA annexes, including **Appendix 10.10: Green Hill G [APP-394]**. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | Acknowledgement that there will be an increase in permanent impermeable area but "negligible" (no supporting evidence in Green Hill G reports).<br><br>Acknowledgement that there will be increased surface water runoff (not covered sufficiently in Green Hill G reports).<br><br>Acknowledgment that increased localised surface water flooding throughout the Scheme and increased flood risk to people and property in immediate and downstream areas. This important statement is downgraded to "potentially"<br><br>Although mentioned in Section 1.1.5 of Document Reference: APP/GH6.3.10.1: Environmental Statement Appendix 10.1: Flood Risk Assessment and Drainage Strategy, there does not seem to be any adequate investigation into the impact of the Scheme on flood risk elsewhere<br><br>Acknowledgment that there will be an increase of water discharged into receiving bodies, but which may elevate the risk of flooding. This statement contradicts the row above. | For construction, the only hydrological mechanism that can increase runoff is temporary soil compaction. This is already identified as the main risk in the FRA and is controlled through the **Outline Construction Environmental Management Plan Revision A [REP1-146]** and the **Outline Soil Management Plan [APP-550]**, which require soil protection, phased working and full decompaction and reinstatement. Once reinstated, infiltration is restored and there is no increase in impermeable area.<br><br>For operation, the Scheme does not introduce permanent impermeable surfacing across the solar arrays. Panelled areas remain vegetated and permeable and drain to the existing ground. Paragraph 3.10.75 of **NPS EN-3** confirms that hydrological impacts from solar PV panels are not generally significant. Any hardstanding associated with substations or inverters is small in scale and is drained through attenuation and flow control to greenfield rates as set out in **REP1-053** and the **FRA DS Covering Report Revision A [REP1-053]**.<br><br>The Green Hill G FRA annex demonstrates that there is no increase |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | in surface water runoff, no new connectivity to watercourses and no mechanism for increased flood risk to people or property downstream. The WFD reference to "potential" effects reflects the generic wording used for the WFD screening process and does not indicate that such effects will occur. The FRA confirms that the Scheme does not increase flood risk elsewhere and that controlled discharges remain within greenfield limits. There is no contradiction between the WFD Assessment and the FRA. |
| SGHS-008 | Hydrology and Flood Risk | GH7.22 – Water Framework Directive Assessment<br>*Please refer to document for reference text* | 8.2.1 (Table 8)<br><u>Construction / Decommissioning</u><br>Applying a "temporary" system during decommissioning is not a permanent solution.<br>Green Hill G-13 only has 100mm to 150mm existing topsoil layer. Is this going to be built up?<br><u>Operational</u><br>Alternative research suggests otherwise.<br>Green Hill G-13 only has 100mm to 150mm existing topsoil layer so how would suitable planting be "unlikely" to generate surface water runoff rates | Table 8 of the **Water Framework Directive Assessment [APP-566]** identifies generic potential effects for WFD screening. It does not state that temporary drainage arrangements during decommissioning are inappropriate. Decommissioning returns the land to its pre-development agricultural condition and therefore only requires short term measures to manage construction traffic and reinstatement. A permanent drainage system is not required once the solar infrastructure is removed.<br>The comments regarding topsoil depth at Green Hill G-13 do not alter the assessment. The **Flood Risk** |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | beyond the baseline scenario. This would remain a problem with site G13. | **Assessment and Drainage Strategy Revision A [REP1-053]** and **Appendix 10.10 Annex I: Green Hill G [APP-107]** use FEH design rainfall, hydrological soil classifications and BGS geological mapping, which provide the correct information for greenfield runoff assessment. Localised observations of topsoil thickness cannot be extrapolated across a hydrological unit and are not required for FRA purposes. The FRA confirms that infiltration pathways are maintained and that the Scheme does not introduce new impermeable surfaces across the panelled areas.<br><br>During operation the land beneath and between the solar arrays remains vegetated and permeable. Paragraph 3.10.75 of **NPS EN-3** confirms that solar PV panels drain to existing ground and that hydrological effects are not generally significant. The FRA therefore concludes that runoff rates remain consistent with the baseline condition, including at Green Hill G-13, and that the Scheme does not increase surface water runoff or flood risk. |
| SGHS-009 | Hydrology and Flood Risk | GH6.3.2.1 – Appendix 2.1: EIA Scoping Report | 9.4.1 - There are other sources for assessing fluvial flooding risk. Macro assessments should not be applied generically without taking into | The statements quoted from the **EIA Scoping Report [APP-380]** represent early baseline expectations before detailed site assessment was |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | *Please refer to document for reference text* | consideration local conditions, especially as is relevant to Green Hill G.<br><br>9.4.56 - Acknowledgment that fluvial flooding flows through Lavendon and could impact on flood risk elsewhere. But no information on this could be found in Chapter 10 and annexures.<br><br>9.4.57 - "Could" should be "has". There is ample evidence to support this.<br><br>9.4.58 - Green Hill site G-13 happens to fall inside Flood Zone 3. Although "limited", the consequences of ignoring this has a significant impact on our village.<br><br>The "Historical Flood Map" apparently does not acknowledge the actual flood events of 1907, 1908, 1980, 2012, 2015, 2018, 2020 or 2024.<br><br>Section 6.0 includes supporting evidence to this effect<br><br>9.4.59 - Green Hill G-13 is definitely not at low risk of fluvial flooding. It appears as though the nature and extent of localised flooding (with significant impacts) has been omitted due to a blanket high-level assessment. | undertaken. The Scoping Report is not the assessment. The detailed fluvial and surface water assessment is provided in the **Flood Risk Assessment and Drainage Strategy Revision A [REP1-053]** and the parcel specific annex for Green Hill G (**Appendix 10.10 Annex I Site G [APP-107]**). These documents supersede the high level scoping content and address local conditions using the methodologies agreed with the Environment Agency and the Lead Local Flood Authorities.<br><br>For Green Hill G, including field G13, the FRA confirms that only small parts of the field intersect Flood Zone 3 and that these areas contain solar panels only. No substations, inverters or other sensitive infrastructure are located within Flood Zones 2 or 3. Solar arrays are raised and allow floodwater to pass beneath them without altering floodplain storage or flow routes. The FRA modelling confirms that the Scheme does not increase fluvial flood risk elsewhere.<br><br>Historic flood events in Lavendon do not alter this conclusion. The EA Historical Flood Map is indicative and the FRA does not rely on it to define flood extents. Site specific assessment uses |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | See comments on alternative research concerning the actual impact of lifting solar panels.<br><br>9.4.60 - The EA "Flood Risk from Surface Water" map does not take into consideration the nature and extent of parameters relevant to site G-13.<br><br>9.4.61 - Refer to comments related to the description in the fluvial section.<br><br>9.4.62 - Green Hill G-13 is definitely not at low risk of fluvial flooding. It appears as though the nature and extent of localised flooding (with significant impacts) has been omitted due to a blanket high-level assessment.<br><br>See comments on alternative research concerning the actual impact of lifting solar panels.<br><br>10.4.1 - The baseline conditions have been obtained from a desktop review. No physical survey of the geology in field G-13 has been completed and would contradict a desktop study if carried out.<br><br>10.4.74/75 - Actual data from site G-13 suggests to the contrary, which is a shortcoming of a desktop assessment. | EA modelled Flood Zones, LiDAR topography, FEH rainfall, hydrological soils mapping and local catchment analysis. These datasets are the recognised basis for flood risk assessment and provide a more reliable representation of flood behaviour than anecdotal historical observations.<br><br>The suggestion that Green Hill G13 is "definitely not at low risk of fluvial flooding" does not reflect the evidence. The FRA demonstrates that G13 is not flooded in the one percent annual probability event with climate change and that the Scheme does not increase flood levels or displace floodwater. Comments regarding the effect of lifting panels are not supported by national policy or evidence. Paragraph 3.10.75 of NPS EN-3 confirms that solar panels drain to the existing ground and that hydrological impacts are not generally significant.<br><br>The FRA does not depend on point geological surveys to establish flood risk. Greenfield runoff and infiltration behaviour are determined using BGS geological mapping, hydrological soil classifications and topographic data, which are the accepted datasets for this type of assessment. Localised soil |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | depth observations cannot be extrapolated to the wider hydrological unit and are not required for an FRA.<br><br>There is no omission in Chapter 10 or its annexes. The fluvial and surface water risks for Green Hill G, including G13, have been assessed in full using the correct methods and datasets, and the Scheme does not increase flood risk on or off site. |
| SGHS-010 | Hydrology and Flood Risk | GH6.2.10 – Chapter 10: Hydrology, Flood Risk and Drainage<br><br>*Please refer to document for reference text* | 10.2.23 - This response seems to be in deference to the Developer's comment 9.4.58 in Document Reference: APP/GH7.22: Water Framework Directive Assessment. There has been no indication as to when the report on this activity will be provided for consultation and feedback.<br><br>The response in Section 10.6 is the same as that included in Section 9.4.58 and 9.4.60 of Document Reference: APP/GH7.22: Water Framework Directive Assessment, so the response has not been considered. Appendix 10.11 does not refer to Green Hill G<br><br>10.6.84 - Refer to comments on Section 9.4.58 in Document Reference: APP/GH6.3.2.1: Environmental | The points raised do not reflect the assessment in **ES Chapter 10: Hydrology Flood Risk and Drainage Revision A [REP1-023]** or the parcel specific flood risk assessment for Site G contained within **Appendix 10.10 Annex I Site G [APP-107]**. Chapter 10 does not defer to scoping material or to a later report. It presents the completed assessment based on site topography, updated Environment Agency mapping, FEH design rainfall and hydrological soil data.<br><br>Section 10.2.23 of **ES Chapter 10: Hydrology Flood Risk and Drainage Revision A [REP1-023]** does not commit to any further report. It summarises the approach taken and identifies that areas within Flood Zones 2 and 3 have been assessed in full, |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | Statement Appendix 2.1: EIA Scoping Report (Part 1 of 9).<br><br>10.6.85 - Green Hill G13 cannot be considered as being at low risk of fluvial flooding.<br><br>10.6.86 - Refer to comments on Section 9.4.60 in Document Reference: APP/GH6.3.2.1: Environmental Statement Appendix 2.1: EIA Scoping Report (Part 1 of 9). | including Green Hill G. Section 10.6 provides the localised assessment outcomes for each development parcel and is not a repetition of the early EIA Scoping Report. The Scoping Report (**Appendix 2.1 [APP-025]**) is high level and has been superseded by the detailed FRA.<br><br>The suggestion that Green Hill G13 cannot be considered at low fluvial flood risk is not supported by the evidence. The assessment in **Appendix 10.10 Annex I Site G [APP-107]**). confirms that only very small peripheral areas of Site G intersect the Flood Map for Planning. These areas contain solar panels only. The FRA demonstrates that Site G is not flooded in the one percent annual probability event with climate change and that the Scheme does not increase flood levels or alter floodplain storage.<br><br>Reference to Appendix 10.11 is misplaced. **Appendix 10.11 Annex J Green Hill BESS [APP-108]** relates specifically to the BESS and does not form part of the Site G assessment. Green Hill G is correctly assessed in **Appendix 10.10 Annex I Site G [APP-107].** |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | There is no inconsistency between the WFD Assessment, the Scoping Report and Chapter 10. The completed assessment shows that Green Hill G, including G13, is at low fluvial flood risk and that the Scheme does not increase flood risk on or off site. |
| SGHS-011 | Hydrology and Flood Risk | GH6.3.10.1 – Appendix 10.1: Flood Risk Assessment and Drainage Strategy<br>*Please refer to document for reference text* | 1.1.1 - This was stated in this report but as per Section 10.2.3 of Document Reference: APP/GH6.2.10: Environmental Statement Chapter 10: Hydrology, Flood Risk and Drainage, this has not been done for Green Hill G.<br>There has been no indication as to when the report on this activity will be provided for consultation and feedback.<br>1.1.5 - In terms of Green Hill G, particularly G13, there has been no investigation into the impact of the Scheme on flood risk elsewhere. Refer to comments on Section 1.1.1.<br>2.2.2 - The joint and cumulative effects for Green Hill G, and in particular G-13, have not been quantified. There is no information on speed-of-onset, depth, velocity, hazard, and duration. Methods such as included in Section 4: Observations on the Quantification of | The flood risk assessment for Green Hill G, including G13, is already provided in the **ES Chapter 10: Hydrology Flood Risk and Drainage Revision A [REP1-023]** and the parcel specific assessment in **Annex I: Green Hill G [APP-107]**. No further report is required. Paragraphs 1.1.1 and 1.1.5 of **[REP1-053]** set out the structure of the assessment and direct readers to the relevant annexes where the detailed parcel level work is presented. Paragraph 10.2.3 of **ES Chapter 10: Hydrology Flood Risk and Drainage Revision A [REP1-023]** also signposts the annexes and does not indicate that any outstanding work remains.<br>**[APP-107]** confirms that only small peripheral areas of Green Hill G intersect Flood Zone 3 and that these areas contain solar panels only. The FRA shows that G13 is not flooded in the one percent annual probability event with climate change and that the |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | Runoff Increase have not been completed.<br><br>2.2.16 - It is not clear if the models used with worst-case scenario are representative of events that exceed design capacity<br><br>2.2.36 - The Developers have conceded that parts of Green Hill G fall within Flood Zone 3, but no associated flood risk assessment has appeared to be completed.<br><br>2.3.4 - It appears as though due consideration has not been given to the requirements of not increasing flood risk elsewhere and will reduce flood risk overall in relation to the impact from Site G-13.<br><br>4.1.4/5 - See comments on Section 9.4.59 of Document Reference: APP/GH6.3.2.1: Environmental Statement Appendix 2.1: EIA Scoping Report (Part 1 of 9) alternative research concerning the actual impact of lifting solar panels.<br><br>Also refer to comments on Section 8.2.1 Table 8 on Document Reference: APP/GH7.22: Water Framework Directive Assessment | Scheme avoids the limited extents of mapped floodplain. There is no mechanism for increased flood risk elsewhere because panelled areas remain permeable and any hardstanding drains at greenfield rates.<br><br>Cumulative hydrology is addressed across **[REP1-053]** and **[APP-107]** using FEH design rainfall, hydrological soil classifications, BGS mapping and LiDAR. Speed of onset and hazard mapping are not required for a Low fluvial risk site. The FRA applies the required national design events and confirms that the Scheme does not increase flood risk on or off site.<br><br>References to alternative panel research do not reflect national policy. Paragraph 3.10.75 of **NPS EN-3** confirms that solar PV panels drain to the existing ground and do not normally result in significant hydrological impacts. The FRA applies this approach and its conclusions for Green Hill G remain robust. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | 5.3.3 - Methods such as included in Section 4: Observations on the Quantification of Runoff Increase have not been completed.<br><br>5.3.4 - Refer to comments on Section 8.2.1 Table 8 on Document Reference: APP/GH7.22: Water Framework Directive Assessment | |
| SGHS-012 | Hydrology and Flood Risk | GH6.3.10.10 – Appendix 10.10: Flood Risk Assessment and Drainage Strategy: Green Hill G<br><br>*Please refer to document for reference text* | 1.6.1/2 - Refer to comments on 5.4.15 and 5.4.16 from Document Reference: APP/GH7.22: Water Framework Directive Assessment. Refer to comments on 10.4.74 and 10.4.75 from Document Reference: APP/GH6.3.2.1: Environmental Statement Appendix 2.1: EIA Scoping Report (Part 1 of 9).<br><br>1.6.3 - Refer to comments on 5.4.15 and 5.4.16 from Document Reference: APP/GH7.22: Water Framework Directive Assessment. Refer to comments on 10.4.74 and 10.4.75 from Document Reference: APP/GH6.3.2.1: Environmental Statement Appendix 2.1: EIA Scoping Report (Part 1 of 9). Personal observations have been that topsoil does not exceed ~0.15m bgl; limestone from ~0.15m to ~2.5<br><br>2.3.4 - Undermines the basis of all content related to the EA 'Flood Risk from Surface Water' map. Implied | The assessment for Green Hill G is already provided in the **ES Chapter 10: Hydrology Flood Risk and Drainage Revision A [REP1-023]** and the parcel specific assessment in **Annex I: Green Hill G [APP-107]**. These documents supersede the early high level material in the Scoping Report and the background information in the WFD Assessment. There is no missing or incomplete work.<br><br>Sections 1.6.1 to 1.6.3 of **[APP-107]** use BGS geology and hydrological soil classifications, which are the required datasets for greenfield runoff estimation. Local observations of topsoil depth cannot be extrapolated to define catchment scale hydrology and do not alter the FRA conclusions.<br><br>The surface water risk comments do not reflect the evidence. **[APP-107]** uses EA Long Term Flood Risk mapping |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | acknowledgment that all relevant reports may be based on inaccurate information.<br><br>2.3.7/8 - Refer to Section 6.0 Localised Flood Events in Lavendon<br><br>2.3.9 - Based on the above, incomplete and inaccurate information, omissions in reports, blanket statements and no due consideration being given to anecdotal or regulatory information/ guidelines, it cannot be accepted that the overall risk of surface water flooding at Green Hill G (and in particular G-13) is considered to be low.<br><br>3.1.2 - Incorrect and misleading comment as there are several mentions of parts of Green Hill G being within Flood Zone 3.<br><br>3.1.3 - Incorrect and misleading conclusion with far-reaching consequences for our village.<br><br>Refer to comments 1.1.1, 2.2.2, 2.2.16, 2.2.36 and 2.3.4 on Document Reference: APP/GH6.3.10.1: Environmental Statement Appendix 10.1: Flood Risk Assessment and Drainage Strategy | together with LiDAR and site topography and concludes that Green Hill G, including G13, is at Low surface water flood risk. Flow routes follow existing land drains and the solar layout avoids the limited mapped areas.<br><br>For fluvial risk, **[APP-107]** acknowledges the small peripheral Flood Zone 3 extents but confirms that G13 is not flooded in the one percent annual probability event with climate change. Only solar panels are present in these locations and the layout avoids the limited floodplain. The conclusion of Low fluvial flood risk is based on FEH rainfall, hydrological soils and channel assessments and is robust.<br><br>There is no basis for the claim that the reports are inaccurate or contradictory. The Scheme does not increase fluvial or surface water flood risk on or off site. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| SGHS-013 | Hydrology and Flood Riks | Schedule of Flooding Incidents on Station Road | A document submitted as part of response to Deadline 1 Submission.<br>[REP1-228] | The Applicant notes the document.<br>The Schedule of Flooding Incidents on Station Road **[REP1-228]** relates to fluvial flooding from the River Nene affecting Station Road and White Mills Marina. These locations are downstream of the Green Hill Order Limits and are in a separate topographic catchment. The dataset is therefore acknowledged but it does not alter the conclusions of the **ES Chapter 10: Hydrology Flood Risk and Drainage Revision A [REP1-023]** or the Green Hill G parcel assessment in **Annex I [APP-107]**.<br>The FRA shows that the development does not drain towards Station Road, does not affect the Nene floodplain and does not introduce any new hydrological connectivity to this area. The incidents listed in **[REP1-228]** are consistent with the known behaviour of the Nene and do not have material weight for the assessment of flood risk at the Site. The Scheme will not influence these events and there is no pathway for increased flood risk to Station Road arising from the development.<br>The potential for flooding of Station Road to affect construction traffic is |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | noted. The **outline Construction Traffic Management Plan [REP1-146]** sets out the procedure that will apply in the event of significant flood events. |
| **Comments on Routes and Access Points [REP1-208]** | | | | |
| SGHS-014 | Transport and Access | Comments on Routes and Access Points | This does not show any of the subtle features found on the ground and which takes absolutely no account of the topography of the site and thus the vertical sight lines and stopping sight distances involved.<br><br>For a contract of such duration and involving not only employees cars and vans but a considerable number of HGV movements it would not be unreasonable for any new access points and some key junctions to have been the subject of a stage 1 safety audit at the very least which would necessitate site visits.<br><br>In respect of the exceptional loads that are being taken to the BESS sites the topography becomes even more important due to the length and potentially low ground clearance of the trailers used for such loads. Merely applying auto-track software to junctions does not take any of this into account. | An Abnormal Indivisible Load (AIL) Assessment is included as Appendix D of the **Transport Assessment Parts 2 and 3 [APP-152] and [APP-153]**.<br><br>The **Transport and Access Routes Supporting Document [REP1-167]** provides further information including the management of AILs and the required approvals and notification process prior to the movement of any AIL.<br><br>The design of the accesses included in Appendix C of the **Transport Assessment Parts 1 and 2 [APP-151 and APP-152]** includes visibility splays in accordance with observed speeds and swept path analysis. The designs are based on site visits, traffic data, OS mapping and topographical data. The various stages of Road Safety Audits will be undertaken as part of the detailed design of the accesses post DCO. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | It should be noted that the opinions offered in this document are personal opinions made with the background of over 45 years' experience working as a highways Engineer mostly in in Northamptonshire and as a resident of Earls Barton an intimate knowledge of the layout and history of the roads and junctions discussed. As an individual and as part of the Stop Green Hill group we do not have access to the vast resources of consultancies available to the applicant and we are frankly surprised at the lack of detail in respect of highway matters. | |
| SGHS-015 | Transport and Access | Comments on Routes and Access Points – Green Hill A | Access A1. This is from the A43 via a roundabout and a modest but two way carriageway and provided the access point itself is properly constructed with visibility should not pose a great problem. This route already takes articulated vehicles to a yard part way along. Crossing A1 W and E. This crosses a single track rural road and will require good approach visibility. | The comments are noted.<br><br>During the construction phase, access A1 is proposed to facilitate cross-site site movements across Newland Road. Visibility splays are provided in the drawings contained in the **Transport Assessment Part 2 [APP-152]**. The cross-site movements can be managed through appropriate traffic management to ensure the safety of existing users of Newland Road. Response to Q20.0.11 of the **Applicants Responses to ExA First Written Questions [REP1-163]** summarises the proposed management |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | of traffic at Crossing A1 E and W on Newland Road. |
| SGHS-016 | Transport and Access | Comments on Routes and Access Points – Green Hill A.2 | Access is from the A43 via Kettering Road Walgrave and again is a fairly straight two way road thus requiring a suitable visibility splay at the access point. Of more concern is the increase in site traffic at the A43 junction which is a standard minor to A road T junction with turning protection on the main carriageway. Large vehicles attempting to turn right onto the A43 in any numbers may present a hazard to traffic on the main road and it would be preferable to ban the HGV right turn for the duration of the contract and require all vehicles to go to the adjacent roundabout to make the turn to the south. | Related HGV routes are presented in **Environmental Statement Figure 13.3 Routes to Scheme Sites North Area (Revision A) [REP1-117]**. This confirms that the route avoids the requirement for HGVs to turn right from Kettering Road on to the A43.<br><br>The details relating to this access in terms of movements and location are presented in Tables 13.10 and 13.11 of **ES Chapter 13_Transport and Access Revision A [EX2/GH6.2.13]** |
| SGHS-017 | Transport and Access | Comments on Routes and Access Points – Green Hill C | Access C1. This effectively creates a cross roads at an existing T junction that is very well used as an access to the popular Beckworth Emporium shop and garden centre. It is also a very popular 'rat-run' for commuter traffic wishing to access the A4500 and the A45.<br><br>It should be noted that the approach to this junction from the west is on a significant uphill gradient within the national speed limit. The curvature and | Access C1 is an existing junction that provides access to a Solar Farm. It was previously used as the construction access for the Solar Farm. As part of the planning application and subsequent permission, North Northamptonshire were consulted as highway authority and raised no objection to the access.<br><br>Visibility splays commensurate with the recorded vehicle speeds are shown in |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | topography of the road severely reduces forward visibility from that direction and correspondingly the stopping sight distance from 60 mph is unlikely to be available.<br><br>I consider that the current speed limit and uncontrolled nature of that junction would lead to an unreasonable increase in the likelihood of a road traffic collision and that suitable measures to regulate this junction will be required. | the drawing contained in the **Transport Assessment Part 2 [APP-152]**.<br><br>Article 16 of the **Draft DCO Revision A [REP1-008]** allows for traffic management to be implemented, including temporary speed limit reductions. |
| SGHS-018 | Transport and Access | Comments on Routes and Access Points – Access D1, D2, D3, D4 , E1 | These are all from Highfield Rd that runs from Sywell Road into Mears Ashby village. This road is of insufficient width to accommodate large vehicles in two way movement. It is a strictly rural carriageway that has been 'widened by use' over time and as such has extremely weak edges on both sides with little or no full depth construction.<br><br>This carriageway is most certainly not adequate for the proposed use to which it will be put. It is also a main access to the Grange Farm and is widely used by equestrian traffic. That is the limit of the roads to the northern sites that I have examined in any detail. I have also looked at the exceptional load route that will come through Brafield and | Please refer to response to Q20.0.12 of the **Applicants Responses to ExA First Written Questions [REP1-163]** which summarises the proposed access strategy for Highfield Road.<br><br>The **Transport and Access Routes Supporting Document [REP1-167]** provides further information including the management of AILs and the required approvals and notification process prior to the movement of any AIL.<br><br>The **Outline Construction Traffic Management Plan [REP1-146]** provides for road condition surveys to be carried out, ensuring that any |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | Cogenhoe. On that I would comment as follows:<br><br>Having exited Brafield and made the right turn towards Cogenhoe the vehicle will have to cross two sets of low hanging local electricity supply cables that may well be lower than the overall height of the load. Having reached the centre of Cogenhoe at the Station Rd junction the auto-track shows the load passing to the right of the central island. Whilst there is sufficient width to do this there is also the presence of a kerbed section that will need to be overridden to make the turn. It is anticipated the some protection and other civil engineering works will be required to make this possible.<br><br>Once onto Station Road/Whiston Road there is a steep and windy downhill section exiting Cogenhoe with a lot of overhanging mature trees. It would not be acceptable to cause any undue damage to these trees<br><br>It is all well and good to offer scheduled and timed access for deliveries but in reality that doesn't work and there is no detail of where HGV's would wait for their 'turn' to access the sites or where they are intended to go overnight. | damage caused to the highways is repaired. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | Overnight lorry parking in Northamptonshire is at a premium and there are already an excessive number of lorries overnighting illegally on trading estates.<br><br>Road condition. I know that many of the roads apart from the Principal and primary network are in poor condition. I do not consider it acceptable to merely state that there will be a before and after condition survey with any damage 'attributed to the works' being repaired afterwards. Many of the rural roads will suffer unacceptable damage during the execution of the contract and will need repair by the Highway Authority at public expense with little or no chance of the costs being reimbursed. | |
| **Critique of the Outline Construction Traffic Management Plan by Nick Frampton, Retired Civil Engineer [REP1-207]** | | | | |
| SGHS-019 | Transport and Access | Comments on the Outline Construction Management Plan | This document appears to be a 'desk top' study with a significant element of 'cut and paste' from other traffic and transport plans.<br><br>Issues ref - Traffic and transport ( Areas C,D and E)<br><br>Main issues –<br><br>1. vagueness of drawings, making interpretation difficult | The **Outline Construction Traffic Management Plan Revision A [REP1-145]** provides the outline management plan, which will form the basis of the detailed CTMP to be approved by the highway authorities prior to commencement of construction. The detailed CTMP must be substantially in accordance with the oCTMP, and will be approved by the relevant planning authority in consultation with the |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | 2. - confusion due to conflicting data in different parts of the OCTMP<br><br>3. A significant amount of assumptions, regarding traffic, transportation, vehicles, workers, and adequacy or the network<br><br>4. Contradicting statements within the OCTMP | relevant highway authority in accordance with Requirement 15 in Schedule 2 to the draft DCO [REP1-008].<br><br>The **Transport and Access Routes Supporting Document [REP1-167]** provides further clarification on matters such as HGV routes. |
| SGHS-020 | Transport and Access | Comments on the Outline Construction Management Plan | APP/GH 6.2.13 (transport and Access) page 11 Consultee - Mears Ashby Parish Council - questions the use of 'Mears Ashby Road, Earls Barton as an HGV route access to Greenhill E<br><br>Comment addressed and confirmed that Mears Ashby Road will NOT be used for HGV Access?<br><br>(This road has never been a defined HGV route anyway.)<br><br>Fig 4.3 of the OCTMP, - Construction HGV routing, clearly shows Mears Ashby Road Earls Barton as an HGV route?<br><br>Whilst we applaud this decision, which appear to be on the grounds that it only effects one field EF33, this begs the question if it is not now a HGV route, how they will get, excavators, pile | The OCTMP has been updated as **Outline Construction Traffic Management Plan (Revision A) [REP1-145]**. The oCTMP confirms the proposed HGV routes and this includes using Mears Ashby Road to access Green Hill E.<br><br>Mears Ashby Road is used to provide access to Green Hill E but the construction route does not extend to Mears Ashby. The **Transport and Access Routes Supporting Document [REP1-167]** provides further clarification on matters such as HGV routes.<br><br>Mears Ashby Road is proposed as a construction route, providing access to Green Hill E and field EF33. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | drivers, imported stone for access routes and other machinery into EF33?<br><br>Given also that the drawings show no access across the stream, hedge line and tree network into (EF 23) which is an 'Enhanced Riparian native planting area?' (There clearly is no cable route marked int EF 23 either.) This would suggest that EF33 is no longer going to be used as part of the scheme?<br><br>The removal of EF33 from the network would be an obvious solution and one which we, the residents of Mears Ashby and Mears Ashby Road, Earls Barton would welcome. | |
| SGHS-021 | Transport and Access | Comments on the Outline Construction Management Plan | The HGV movements have been based upon forecasts for similar schemes at Cottam and West Burton.<br><br>How are the road layouts, vehicle size, and HGV movements similar?<br><br>Further contradiction -Table 3.2 construction worker movements and vehicles.<br><br>Total worker arrivals for Greenhill E =75 per day Total 2 way vehicle movements = 150. Therefore this means 1 worker per vehicle.<br><br>Table 3.3 - combined worker and HGV for Greenhill E = 84-75 (ie 9 HGV) Total | 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 same principal components and similar design parameters.<br><br>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 |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | 2 way Vehicle movements for Greenhill E , 168- 150 (18)<br><br>So - the largest area of Solar panels on the whole scheme 'Greenhill E', will only have 9 HGV's per day/ (84-75) Given the number of accesses on Highfield Road (5) and the amount of widening of accesses, the internal haul roads, worker parking areas. The excavating, disposal, filling with imported stone, the hedge removal and disposal, the movement of excavators, pile driving equipment, fencing, solar panel deliveries,etc, - only 9 HGV's per day? | quantities of solar modules, mounting structures, access tracks, ancillary equipment and landscaping required and HGV delivery capacities.<br><br>Table 3.2 of the **Outline Construction Traffic Management Plan (Revision A) [REP1-145]** presents the number of forecast worker vehicle numbers, with 75 arrivals representing 150 two-way movements once departures are accounted for.<br><br>HGV arrivals per day have been assessed as described and these will occur across the construction period. 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. As shown in Table 5.1 of the **Transport Assessment [APP-151]** the forecast HGV construction vehicle movements for Green Hill E is 473 days with an average of 3 HGV movements per day and a peak delivery period of 9 HGV deliveries per day. |
| SGHS-022 | Transport and Access | Comments on the Outline Construction | States that Construction vehicles will not be able to deliver until 0930. (Construction industry starts at 0730 - | The timing for movements leaving the origin location to reach the Scheme will be a matter for the specific contractor to |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | Management Plan | lorries carrying stone and equipment will be on the road by 0730)<br><br>6.2.1 - Whilst the introduction of construction compounds is applauded and construction workers have to park there and catch a shuttle bus, what happens to late arrivals due to traffic? Will they wait for the shuttle bus to return? | consider and will vary dependent upon travel distances and times.<br><br>The **OCTMP Revision A [REP1-145]** provides the outline within which a future detailed CTMP will be prepared. This includes a commitment to a Construction Worker Travel Plan. Late arrivals will be considered in the Travel Plan which for irregular instances as described, may include measures such as the shuttle bus returning to collect late workers. |
| SGHS-023 | Transport and Access | Comments on the Outline Construction Management Plan | Finally, I have found no mention of traffic control on the roads affected by the widening (Highfield Road for example) for the creation of these accesses, so temporary traffic signals will have to be used.<br><br>I have also assumed that all the 5 accesses will be widened, filled with stone, all at the same time, as the machinery and equipment will be there.<br><br>That being the case then there will be 4/5 sets of traffic lights on Highfield Road. This would be traffic chaos and should really be subject to a road closure. Given that the alternative is Glebe Road, which is single track, then this exemplifies the fact that this | Section 5.3 of the **OCTMP Revision A [REP1-145]** provides details relating to access points. The use of temporary traffic management measures is described where this will be considered on a site-by-site basis and agreed with the highway authorities.<br><br>There is currently no basis or commitment to support the assumption that all potential access points will be constructed at the same time nor that the appropriate management of construction during this period would necessitate 5 separate sets of traffic signals to control traffic as suggested in SGHS-023. The access strategy for Highfield Road is summarised in response to Q20.0.12 of the **Applicants** |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | fragmented solar farm proposal, is totally unsuitable for this location | **Responses to ExA First Written Questions [REP1-163]** |
| SGHS-024 | Transport and Access | Comments on the Outline Construction Management Plan | For the main access on Sywell road, (C1 opposite Beckworth Emporium) 4 way temporary traffic lights will be required at the junction to control traffic from both directions east west and for access into area C and to access to Glebe road and the entrance to Beckworth Emporium 20m from the junction. There has been no consideration to the impact that this scenario will have, given that on Monday 6th October I called int Beckworth Emporium, to do a traffic count at Mid-day. There were 250 cars parked in the car park and I was told this was a typical day. I live less than 1 mile from Beckworth Emporium, I know how popular and how busy it is and how much traffic comes from the Sywell road in both directions, with its bad bends and poor visibility. Visitor numbers to Beckworth will inevitably fall due to the delays caused by the 4 way lights and people will not bother to visit. Queues will cause frustrations at all times with 4 way lights as the 'inter green periods' are considerably longer. Visitor numbers will drop and Blue Diamond group, the owners will take this up with NNC. | Refer to the response to SGHS-017. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| **Green spaces, mental health, Public Rights of Way and Economic Impacts Potential impacts of Greenhill Solar Development [REP1-196]** | | | | |
| SGHS-025 | Human Health | Human Health Assessment | It should, at the outset, be pointed out, that GH6.2.18 acknowledges that the causal link between health effects and wider societal and environmental circumstances is hard to establish. Understandably, therefore, the author relies on significant amounts of "professional judgement" (e.g. 18.4.21). However, challengers are entitled to question whose judgement is being invoked. | The Applicant notes this comment and refers to the chapter author's competence and experience as set out in **ES Appendix 1.1: Statement of Competence [APP-065]**. The requirement to use professional judgement is an industry standard (WHIASU, 2012; PHE, 2019; IEMA, 2022; ISEP, 2025) due to substantial elements of health assessments being based on qualitative data and themes with subjective responses. |
| SGHS-026 | Human Health | Human Health Assessment | Paragraph (18.6.45) therefore, not only serves to negate the value of the population level data but entirely omits the villages and immediate surroundings of Holcot and Walgrave for reasons that are not explained. Indeed, those villages are barely referenced even though the submitted comments (in the case of Holcot) were responded to (Table 18.1). The village of Walgrave appears to have been ignored in the document analysis. | All paragraph and table references refer to document **ES Chapter 18: Human Health [APP-055]**.<br><br>Paragraph 18.6.45 should be read in the context of both Tables 18.10, which gives district level data, and Table 18.11 which gives local ward (based on 2022-ward areas) level data on prevalence of key health determinants, including rates of depression and emergency hospital admissions. Table 18.11 indeed identifies that some areas within the 2 km ZOI are of greater than average prevalence for poor mental health-related outcomes. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Para 18.8.52 goes on to explain why some communities are explicitly referenced – due to the visual extent of the Scheme visible from the majority of the village or village approaches. Where communities are not explicitly referred to (such as Walgrave, Old, Holcot, and Lavendon) this is because these locations are likely to experience impacts reflective of the 2 km ZOI as a whole, rather than as specific outliers or examples of note. All communities within the 2 km ZOI have been assessed and are included in the assessment of likely human health and wellbeing effects. |
| SGHS-027 | Human Health | Human Health Assessment | Table 18.13 in Chapter 18 (GH6.2.18) summarises the Residual Effects for Human Health. Remarkably, this proposes that there are only medium or low impacts on Human Health with the exception of Noise and Vibration which would have high impacts for proximal residents, albeit that these would be reduced by "embedded offsets".<br><br>These judgements demonstrate a coalescence around lower range impacts that might be referred to as an example of a "regression to the mean", rather than a careful discrimination | All paragraph and table references refer to document **ES Chapter 18: Human Health [APP-055]**.<br><br>The Applicant refers to Table 18.7 in which the criteria for magnitude of impact is set out. The Applicant wishes to highlight that high and medium magnitude impacts would be expected to have severe health and morbidity outcomes or changes in quality of life, and/or affect a substantial proportion of the population.<br><br>The assessment of human health undertaken looks at population and |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | between differing elements within the analysis. | community-level impacts, and does not look at sub-populations unless there is an evidenced likelihood that they would experience far greater impacts than the population as a whole (hence why noise and social care services are distinct due to the location of receptors that are far more than likely to experience effects greater than the population overall). This analysis is undertaken through the assessment text, and hence the Applicant is confident that the assessment outcomes accurately reflect population-based outcomes, and sub-population outcomes only when there is likely to be a substantively different significance of effect. |
| SGHS-028 | Human Health | Human Health Assessment | Public Rights of Way will be restricted, moved, or at least for periods of time, completely blocked by development proposals. 18.6.41 refers to the ES Appendix 17.1 as identifying "a total of 70 PRoWs and permissive recreational routes". Of these there are five which are cited as "inter-settlement infrastructure". Oddly excluded from that list is the footpath from Grendon to Castle Ashby. It is understood (APP/GH2.6 TP182) that this footpath will be closed for access for construction traffic to construction compound 2 and | Paragraph 18.6.41 of **ES Chapter 18: Human Health [APP-055]** directs the reader to **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]** with respect of all PRoWs. The 'inter-settlement infrastructure' bulleted thereafter refers only to roadside infrastructure, hence PROWs are not included there.<br><br>The Applicant acknowledges that footpath 'TP182' designated WN\|KE\|1 and NN\|TF\|4 from Grendon to Castle Ashby is to be crossed by the Cable Route Corridor and access haul route to |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | cable laying (presumably for a 2-year construction period). A photograph of where this interrupts the footpath is appended (Appendix 1a). | Construction Compound 4 and is anticipated to experience a medium-term temporary moderate-minor adverse effect during construction due to potential diversions and closure works for the laying of cables, and for the introduction of a crossing point for HGVs (see assessment of 'Grendon FP TF4' in **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]**.<br><br>The Applicant is not proposing to close this route for the 2-year construction phase. Measures to keep the route open with disruption to users, and any closures kept to a minimum are set out in the **OPROWPPMP [REP1-147]** which is secured by Requirement 18 of Schedule 2 to the **Draft DCO Revision A [REP1-008]**. |
| SGHS-029 | Human Health | Human Health Assessment | No definition of the term "culture" is provided in GH6.2.18 even though the term itself is used throughout. The notion of "belonging" has long been an associated definition and is relevant to this analysis. Each village impacted by the scheme has not only a sense of identity but is characterised by residents who have occupied their homes for long periods of time. There is, however, evidence that the numbers of houses for | As set out at paragraph 18.4.6 in **ES Chapter 18: Human Health [APP-055]**, culture falls under the bracket of 'community identity, culture, resilience and influence' as defined by IEMA guidance from 2022.<br><br>This has since been expanded upon by updated guidance for social impact assessments (ISEP, 2025) which defined culture as being a broad term to |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | sale, with residents seeking to move away from the area, has increased and a fall in house prices – at least prospectively - has been independently confirmed. | cover religious or customary values, attachment and identity in relation to sense of place (very similarly to the idea of 'belonging'), heritage, ethno-linguistics, localised traditions, and arts and creative history.<br><br>The assessment in **ES Chapter 18: Human Health [APP-055]** recognises that the Scheme will have a non-significant effect on community identity and culture, largely as a result to experience of rurality and changes to sense of place. This however, does not assess behavioural changes, such as the want to relocate, as this is not consistent or predictable, and driven by individual responses to the Scheme rather than patterns amongst populations or sub-population groups. In a related sense, changes to property value as a result of individual buyer or seller preferences, and their behavioural response to the Scheme, cannot be assessed as these are speculative, and are more likely to be driven by other independent factors. Please refer to SOC-009 in the **Applicant's Response to Relevant Representations [REP1-161]** for reasoning why property prices have not been assessed. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| SGHS-030 | General Matters | Site Selection | There is so much impact on our British wildlife from housing to traffic to solar panels. There is a better solution and place them on high rise carparks and buildings, not countryside. The village and surrounding areas are a thing of beauty and we need to protect this and protect the wildlife and there homes.<br><br>Solar panels should be installed on roof tops, barns, warehouses not prime agricultural land | The Applicant addresses brownfield and rooftop developments in Section 7.3 of the **Statement of Need [APP-556]**, in particular the constraints and limitations of rooftop solar and the benefits of transmission connected solar. In summary, a very large number of commercial rooftops would be required to deliver the equivalent capacity of a utility-scale solar farm. This would require multiple land ownerships, and the legal complexities involved in combining multiple sites of this nature would be prohibitive. The government recognises rooftop solar as being clearly desirable, both on residential and commercial premises. However, rooftop solar energy cannot be considered as a reasonable alternative to the Scheme because rooftop solar alone will not be able to meet the scale and pace required of new capacity growth to meet the UK's needs. Therefore utility-scale ground mounted solar schemes are also needed. Roof-mounted solar panels should still be deployed in addition to utility-scale solar farms but should not be deployed instead of them. |

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| **Grendon – Landscape and Visual Impact Assessment Comments [REP1-203]** | | | | |
| SGHS-031 | Human Health | Character of Grendon | The areas and viewpoints that are presented here also need to be interpreted in a wider context - both historical and cultural. Those who live here now are mindful of the ancestral heritage, both ancient and more recent. The rural roads, the footpaths and hedgerows and fields that surround them have been worn into place from pre Christian era's. That these are to be stopped up for any length of time or bounded by fences in a new act of enclosure, feels painful to those who walk the area. The open fields, many of them individually named, have enabled walkers to appreciate the natural surroundings and the spires of each local church. The relationships between each village have been meaningful and long-lasting, and the disconnections imposed by the industrialised panelling between them is experienced by many as distressing. | Please refer to the **Applicant's Response to Relevant Representation [REP1-161]** at 'HUM-001' in respect of access to PROWs, mitigation measures during construction, and access to the countryside for wellbeing. |
| SGHS-032 | Glint and Glare | Effects to horse riders | The presence of horse riders using the local roads and bridlepaths. The presence of 4.5 metre high tracking panels will cause glint and glare issues impacting both horses and riders. It should be pointed out that local businesses providing riding and stabling | The assessment considered receptors along Public Rights of Way (PRoW) and horse facilities. In line with industry guidance, the assessment considered the impacts of glint and glare on the safety of these receptors. As outlined in **ES Chapter 15 Glint and Glare [APP-** |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | facilities will be at risk if less destructive environments are available elsewhere. | **052]** in section 15.4.21, the sensitivity of PRoW and horse facilities have been categorised as 'low', and the maximum magnitude of impact for PRoW and horse facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms.<br><br>Glint and glare from panels are more likely to be experienced around sunrise and sunset, when the incident angle of sunlight is low enough to 'skim' the surface of the panels, causing glint and glare to PROW users either at ground-level or mounted on horses. Whilst this is a consideration for the assessment of PROWs and equestrian facilities as recreational features in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and its **appendix (Revision A) [REP1-079]**, no significant adverse effects are anticipated. In particular, the British Horse Society (which can be seen in Appendix A **[REP1-162]**recognises that glint and glare does not have any detrimental effect on horses or equestrian users of PROWs. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| SGHS-033 | Glint and Glare | Aerodrome Safeguarding Advice Note 3 & 5 | Advice note submitted as part of response to Deadline 1 Submission.<br>[REP1-197]<br>[REP1-198] | The Applicant notes the documents.<br>As outlined in **ES Chapter 15 Glint and Glare [APP-052]** in section 15.3, the Glint and Glare Assessment considers this guidance published by the (now disbanded) Civil Aviation Safeguarding Team (CAST). |
| **Easton Maudit – Landscape and Visual Impact Assessment Comments [REP1-204]** | | | | |
| SGHS-034 | Landscape and Visual Impacts<br>Cultural Heritage<br>Transport and Access | Concerns regarding Easton Maudit. | I am concerned about: (i) The virtual surrounding of the beautiful historic village of Easton Maudit and its ancient church with solar arrays and industrial infrastructure; (ii) The plans for arrays in the fields on either side of PRoW TD5/TP206 and TD7/TP205. I feel strongly that both (i) and (ii) would cause severe damage to the uniquely valuable character of the village, the local landscape, its heritage and the welfare of local people; (iii) The construction of extensive access tracks, which will need to be massively engineered to avoid becoming a quagmire in wet weather, will cause a huge amount of environmental damage; (iv) Contrary to claims made by the Applicant, the complex inefficient shape and layout of the entire scheme will increase the total harms and carbon | **ES Chapter 12: Cultural Heritage [APP-049]**, supported by **ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]**, has identified a Moderate adverse effect would occur as a results of the Scheme on Easton Maudit Conservation Area and the Church of St Peter and St Paul (NHLE:1189610) (see **ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]**).<br>The Scheme design has been carefully considered so that the visual corridor is retained between Churches in Grendon, Eastern Maudit and Bozeat, especially along PROW with historical associations / views between heritage assets. As such solar panels have been removed from Fields FF9, FF13, FF14, FF16 and FF22, and offsets in Fields FF11, FF15, |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | cost compared with more compact designs. | FF19 and FF26. Enhanced screening of existing hedgerow and tree belts has been also been proposed to protect the Church of St Peter and Paul.<br><br>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.<br><br>The LVIA **[APP-045]** identifies a significant adverse effect is to the character of the landscape within 1km of the Sites, including that surrounding Easton Maudit during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure, before |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | the mitigation planting has become established. The effect is reduced to not significant from Year 15 of operation. Specifically in regard to Site F, the proposed mitigation planting includes for substantial areas of new woodland, hedgerow and meadow planting, which once established would provide positive contributions to the countryside surrounding Easton Maudit. 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 helping mitigate adverse effects to no longer being Significant, however adverse effects would prevail for the lifetime of the Scheme. |
| **The Three Shires Way: Section Adjacent to Site G [REP1-199]** | | | | |
| SGHS-035 | Landscape and Visual Impacts | The Three Shires Way: Section Adjacent to Site G | The landscape along this entire section could be dramatically altered by the presence of Site G, a development that will dominate the views and ambiance of the Three Shires Way here. Site G, with its proposed solar farm, will become the predominant visual feature, overshadowing the gentle hedgerows and open countryside that have traditionally defined the area. Where once the horizon was shaped by rolling | The design of the Scheme has undergone an iterative development process involving collaboration between the Applicant, design team, and the environmental consultant team. This process has been informed by feedback received through various consultation activities, including engagement with stakeholders, statutory consultees, host authorities, local communities, and residents. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | fields and scattered woodland, the solar farm may now shape the character and experience of the route, especially for those enjoying this corridor from Lavendon and beyond. | 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.<br><br>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.<br><br>The Three Shires Way passes through Site G along PRoW MK\|Lavendon\|015#2 (TP227) and PRoW MK\|Lavendon\|002 (TP217). Panels have been set back between 25m and 55m from this route, and 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. Alongside the route, the landscape |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | proposals are for a proposed new hedgerow with irregularly spaced hedgerow trees providing enclosure and separation from the array. Once established, 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.<br><br>The LVIA recognises that these changes would change the character of the PRoW in part however this would be of a similar character to that found within the woodland setting to the north. The LVIA also recognises that filtered glimpses of proposed infrastructure would likely still be possible following establishment of the green corridor, with infrastructure would be more visible in winter months. |
| SGHS-036 | Landscape and Visual Impacts | The Three Shires Way: Section Adjacent to Site G | Along this section of the Three Shires Way, the impact of Site G is particularly striking. A series of viewpoints illustrates how the land to the left, bordering the A509, is visually dominated by the development. From the vantage point at Low Farm, situated at the end of Castle Road, Lavendon, and continuing along | The Applicant notes this comment. Please see response to comment SGHS- 035. |

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| | | | to the Three Shires Way, Site G forms a continuous presence on the landscape.<br><br>This stretch is characterised by a well-used footpath and bridleway that runs directly alongside the boundary of Site G. The route is frequented by walkers, cyclists, and riders, all of whom are now met with the prospect of a transformed view. Where open countryside once greeted passers-by, the entire landscape captured in these images is set to be replaced by rows of solar panels, fundamentally altering the visual experience for all who use this rural corridor. | |
| SGHS-037 | Landscape and Visual Impact | Environmental Colour Assessment | The Landscape Institute Technical Information Note on Environmental Colour Assessment submitted as part of response to Deadline 1 Submission.<br><br>[REP1-205] | The LI Technical Information Note 18-4 Environmental Colour Assessment is an informative document aimed at increasing awareness of, and promote interest in, the Environmental Colour Assessment (ECA) process. The note aims to raise awareness of ECA, encourage landscape practitioners to develop methods and skills in this area. The main objective of ECA is to create a "palette" of colours for a given area: based on the baseline (natural, cultural, built colours) which then informs selection of materials, surfaces and finishes for future development. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Given the nature of the proposed development, there is limited opportunity to influence the palette of colours being proposed. However, where possible, recessive and muted colours are to be used to aid absorption of these components within the landscape, with colours to be agreed with the relevant planning authority prior to construction. |
| SGHS -038 | Landscape and Visual Impacts | Public Health and Landscape | A document regarding 'Creating Healthy Places' submitted as part of response to Deadline 1 Submission.<br>[REP1-206] | The Applicant notes the document.<br>The Landscape Institute "Public Health and Landscape: Creating Healthy Places (Position Statement) sets out five principles that healthy places should embed in design. The below sets out how the overall approach to the design of the Scheme has responded to these 5 principles and how the fundamental principles of good design have been embedded throughout the Scheme (see The Design Approach Document [APP-560]):<br>1. Healthy places improve air, water and soil quality, incorporating measures that help us adapt to, and where possible mitigate, climate change.<br>The Scheme provides extensive native meadow planting beneath and between |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | panels providing extensive habitat and BNG benefits.<br><br>The Scheme provides water corridor enhancements and new ponds providing additional wetland habitat benefits.<br><br>The OSMP [APP-550] and OCEMP [REP1-131] are provided to avoid soil compaction through clearly defined construction access routes and low-impact machinery.<br><br>The landscape proposals include for new shelterbelts and hedgerows throughout the Scheme.<br><br>Through implementation of the above, the Scheme becomes both an energy producer and a landscape led environmental quality improver contributing to carbon reduction and improved habitats and ecosystems.<br><br>2. Healthy places help overcome health inequalities and can promote healthy lifestyles.<br><br>The Scheme maintains existing PRoW and provides new permissive paths throughout helping residents in nearby communities access nature and exercise, particularly in areas lacking green space. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Following consent, interpretation boards could be installed helping explaining renewable energy, climate change, and biodiversity to support community learning and empowerment.<br><br>Following consent, operator could partner with local schools or community groups for volunteering, for example planting days, helping providing engagement opportunities for groups who might otherwise lack access to natural environments.<br><br>Despite the Schemes core function, it could become a health-promoting local asset, encouraging physical activity and environmental awareness.<br><br>3. Healthy places make people feel comfortable and at ease, increasing social interaction and reducing anti-social behaviour, isolation and stress.<br><br>The Scheme includes opportunities for greater public access to the countryside through the provision of permissive paths and through the maintenance of those existing PRoW that cross the Sites.<br><br>The use of buffers, setting infrastructure away from PRoW helps maintain natural surveillance and sight lines through the |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Sites allowing these routes to maintain an open character and reducing the potential for antisocial behaviour.<br><br>Buffers alongside the PRoW and Permissive Paths have been used for attractive areas of meadow planting creating attractive 'green corridors' throughout the Sites.<br><br>As a result of the above, the development contributes positively to the public realm by offering accessible, safe, attractive outdoor experiences connected to landscape.<br><br>4. Healthy places optimise opportunities for working, learning and development.<br><br>The Scheme offers learning opportunities through the use of signage and information boards detailing the Schemes interrelationship between ecology, soil management, solar technology and sustainable design.<br><br>Once operational, the operator could offer opportunities for local apprenticeships or training programmes in habitat management, horticulture or renewable-energy maintenance. |

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| | | | | As a result, the Scheme provides opportunities for green-skills training and environmental learning.<br><br>5. Healthy places are restorative, uplifting and healing for both physical and mental health conditions.<br><br>The Scheme provides biodiverse, ecologically rich landscapes through the delivery of extensive wildflower meadows, hedgerows, tree and woodlands helping offer a restorative visual experience.<br><br>The use of a diverse range of native plant species throughout maintains varied seasonal interest (spring blossoms, summer meadows, autumn colours, winter structure) to create year-round enjoyment.<br><br>As a result, the development supports mental wellbeing, offering nature experiences linked to calmness, reflection and connection with the landscape. |
| SGHS -039 | Landscape and Visual Impacts | Views from Grendon | Image within submission document suggesting that the second BESS will not be visible from Grendon. That does not appear to be the case since the view from a few yards further down the public | The submitted photography is located upon PRoW NN\|TF\|4 (TP178) on the western edge of Grendon in a very similar location to LVIA Viewpoint 25 **[APP-358].** At Grendon, the proposed BESS are located within two separate |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | footpath has a clear view across to the storage unit.<br>[REP1-202] | fields; BESS1, and BESS2. Both fields are located immediately adjacent to the existing Grendon National Grid Substation, and north of Station Road. The BESS1 field is located to the south of the existing Substation, whilst the BESS2 field is located approximately 200m north west of BESS1, and directly west of the existing Substation. The BESS2 field is separated from the BESS1 field by scrub and woodland belts. These woodland belts continue on all but the northern side of the BESS2 field and along both sides of Station Road. As such, the BESS2 field is very heavily enclosed within the countryside surrounding the existing substation.<br>The LVIA acknowledges that from PRoW NN\|TF\|4 views of construction activity within BESS1 would be visible but filtered by existing intervening vegetation, and once built, views of the proposed infrastructure within BESS1 would remain, but filtered behind existing vegetation. However, once established proposed planting mitigation along the southern and western boundaries of BESS1 would provide screening of proposed infrastructure and replicate the existing wooded field boundaries that surround the existing substation. |

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| **Objection on Agricultural Issues [REP1-221]** | | | | |
| SGHS-040 | Agriculture and Soils | Food Security and Site Selection | The applicants' proposal is to construct a solar farm on land which is substantially classified as Best and Most Versatile and is predominantly used for production of cereal crops.<br><br>From the above it is equally important that we as a nation maintain and preserve our precious agricultural lands which produce cereals, particularly in the future as the effects of climate change, increases in population, GDP growth and demands in animal feed take hold, certainly over the next 60 years and beyond thus maintaining our food security with respect to cereal production.<br><br>Inevitably there are alternative sites (to the current proposals) in the eastern UK which can accommodate solar farms on land which is not good agricultural land for food production. Perhaps not surprisingly this is a requirement of the current UK planning policies. | Please refer to the Applicant's response to comment 'SBMP-001' in **The Applicant's Response to Relevant Representations [REP1-161]** which relates to policy appraisal, use of agricultural land and site selection. |
| SGHS-041 | Agriculture and Soils | 2020/21 Soil Policy Evidence Programme | A document regarding 'The impact of solar photovoltaic (PV) sites on agricultural soils and land quality' submitted as part of response to Deadline 1 Submission. | The Applicant notes the document but did not use this document in the assessment of this Scheme, as it is not considered industry standard and is presented as a research chapter. This document reviews the impact of solar |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | [REP1-225] | photovoltaic (PV) sites on BMV agricultural land and soils from the construction, operational and decommissioning phases.<br><br>The Applicant has foreseen this impact and conducted mitigation measures to reduce impact on BMV land and soils through a 5-Stage Site Selection Process with a Widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area Appendix 5.1 (Site Selection Assessment [**EN010170/APP/GH6.3.5.1**]) and **Outline Soil Management Plan [APP550]**. Please refer to the response to 'EMPM-006', 'SBMP-001' and 'NNC-071' in relation to site selection and protection of BMV land and soils in **The Applicant's Response to Relevant Representations [REP1-161]**. |
| SGHS-042 | Agriculture and Soils | Use of Agricultural land in England by ground-mounted Solar | Guidance note submitted as part of response to Deadline 1 Submission.<br><br>[REP1-226] | The Applicant notes the document and used it to address PEIR question - How much of the BMV % total UK crop land is being taken for solar panels. However it was not used in the assessment of this Scheme as the assessment was undertaken using the ALC grades and their areas of the Scheme to evaluate the impact of the Scheme and this document just states the factual data of |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | ALC Grades 1 to 5 used by ground-based solar installations in England. |
| SGHS-043 | Agriculture and Soils | BMV Land | A document titled 'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land' submitted as part of response to Deadline 1 Submission.<br>[REP1-227] | The Applicant notes the document which was not used in EIA. However the Environmental Statements cover all the issues raised in the document. Pease see below.<br>This statement addresses issues with regard to solar, food security and BMV land in 4 aspects:<br>1)Protecting the Best Agricultural Land - Applicants for Nationally Signiant Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible in compliance with National Policy Statement,<br>2) Addressing Cumulative Impacts,<br>3)Improving Soil Surveys-The Government will address this by supporting independent certification by an appropriate certifying body, subject to relevant business case approval, to ensure Agricultural Land Classification Soil Surveys are of a high standard, requiring surveyors to demonstrate meeting an agreed minimum requirement of training/experience. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | 4) Supporting solar on rooftops and brownfield sites.<br><br>Please refer to the response to 'ScPC-002' and 'EMPM-006' in relation to Food Security and BMV land, and SBMP-001 and SAMP-004 in relation to brownfield and rooftop in **The Applicant's Response to Relevant Representations [REP1-161]**. With regard to cumulative impacts in relation to soils and agricultural land, this has been assessed and addressed in **Chapter 20 Agricultural Circumstances [APP-057]**. With regard to soil/ALC surveys, the ALC survey of the Scheme was conducted by a Chartered Soil Scientist and member of British Society of Soil Science and an ALC surveyor with over 40 years' ALC experience along with 2 other surveyors with membership of British Society of Soil Science. This meets the competency requirements for ALC survey set out by British Society of Soil Science. |
| **Mears Ashby – Landscape and Visual Impact Assessment Comments [REP1-200]** | | | | |
| SGHS-044 | Cultural Heritage | Military Sites | We know that all military sites are protected under 'The protection of Military Remains Act 1986' and it is an offence to tamper with, damage, move | No development is proposed within the Fields EF9 and EF26 where WW2 crash sites are recorded within Site E. Where archaeological evaluation has been |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | or unearth any items at such sites unless the MOD has issued a licence authorising such activity (which at this stage they haven't) This memorial site is an important part of our villages heritage and we must protect it. We expect the developer to locate infrastructure a suitable distance from the memorial site. As I minimum we would expect to see panels removed from EF 13, EF14, EF10, EF22, EF24, and EF21. The developer has not consulted the HER records or the Local Authority as defined in 12.3.11 and therefore has made no attempt to ensure protection of this important heritage asset. To quote their own design specification, 'The design is not sensitive to above and below ground heritage assets | undertaken in surrounding fields, no remains associated with the crash were encountered. Therefore, there is no potential for impacts to crash sites as a result of the Scheme in Site E.<br><br>The Applicant is currently consulting with the Joint Casualty and Compassionate Centre Commemorations team (JCCC) to identify if a licence to excavate at military aircraft crash sites is required as part of the construction phase of the Scheme.<br><br>Careful consideration has been given to the Scheme design, which has been developed with consideration to consultation with Historic England and the Local Planning Authorities and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]** for embedded mitigation and Section 12.11 for additional mitigation). This includes setting back panels in fields adjacent to Wilby Road and the Mears Asby Conservation Area.<br><br>**ES Appendix 12.2 Archaeological Desk-Based Assessments [APP-121** |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | **to APP-127]** include the results of HER searches. |
| SGHS-045 | General Matters | Site Location<br><br>Landscape and Visual Impacts | I am not averse to solar as an energy system, but installing them in less prominent areas, such as near the existing industrial site of Park Farm would be a more suitable option. Instead of just applying for solar instalments, the developers should work with local residents to reduce their visual dominance and allow the natural beauty of the area to remain the focal point. Balancing the need for clean energy with the desire to preserve the village's visual appeal will likely require careful planning and community input, but a delay of a few months, seems to be balance the hundreds of years the village has stood, which will be destroyed within the next 2 year. | The Statement of Need [APP-556] describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". The Statement of Need [APP-556] provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050.<br><br>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 Energy (EN 1) and National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Applicant sought to locate the Scheme from the Point of Connection on commercial feasibility and the efficiency of the transmission of electricity to the grid, to avoid the use of BMV land as much as possible. |
| SGHS-046 | Noise and Vibration | Mental wellbeing during construction | I have issues with background noise and claustrophobia, and that is a key reason why I work from home where the quiet and views contribute to creative thinking, the solution to major engineering problems and my mental wellbeing. The noise pollution from the proposed solar farm is also a major issue. It is bad enough that I can hear the air conditioning units at the Park Farm Industrial Estate, but the noise from the proposed solar farm will be a lot worse, making it unbearable for me. I will not be able to think during the day or sleep at night. | Environmental Statement Volume 1, Chapter 14: Noise and Vibration has considered the assessment of likely significant effects in respect to noise and vibration of the site during *construction phases of the Scheme).* The assessment is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of the Scheme and nearby existing sensitive receptors. Noise predictions and subsequent assessments of impacts have been carried in accordance with current policy and guidance, and the methodology discussed and agreed with all relevant statutory bodies.<br><br>In respect to construction noise, the assessment results predict that noise levels from the Scheme compliant with the relevant industry standard guidance at the closest sensitive receptors during the daytime and night-time periods with the appropriate mitigation measures incorporated. This is an indication of a |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Moderate/ Minor effect and **not significant.**<br><br>Onsite electrical infrastructure is proposed no closer than 550 m to the east of the property, and 600 m to the north-northeast. The intervening fields in both directions are proposed for ecological mitigation, providing a spatial buffer to the village of Mears Ashby.<br><br>As a high sensitivity receptor, predicted construction noise and vibration effects from the Scheme are not anticipated to be significant, and thus are not anticipated to have significant adverse health and wellbeing impacts, while operational noise levels are anticipated to be below existing background noise levels at this receptor. |
| SGHS-047 | General Matters | Resilience of solar farms and nuclear options in the future | I am also concerned about the resilience of the solar farm from an engineering and commercial point of view. It will be out of date before it is finished, superseded by the nuclear options, and investors will be disappointed, leaving us with a 60-year white elephant. The views will be lost forever with no real benefit to the country. The planners and politicians really need to think about the consequences, viability of the project, | The **Statement of Need [APP-556]** sets out the urgent and enduring need for unprecedented capacities of new low carbon generation to meet energy security and decarbonisation policy requirements.<br><br>The Statement of Need refers to the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | destruction of the countryside and effect on the locals, such as me. The country still needs qualified engineers to provide better solutions for the country. We quietly beaver away in the peace and tranquillity of our offices overlooking England's green and pleasant land, that can only continue if the countryside is not desecrated by solar panels, inverters, and battery storage units. | affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".<br><br>This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in November 2023.<br><br>The Scheme would generate power earlier than other potential technologies (which may have longer construction timeframes or have potentially not yet been proven at scale or have not been funded) which could support decarbonisation only in future years and only if they are brought forwards.<br><br>As the Scheme is assessed against a Rochdale Envelope of worst case scenario and isn't specifying specific technology it will mean that at the time of construction the optimal technology choice can be made providing it meets the parameters that have been assessed.<br><br>The decommissioning is secured through Requirement 21 in Schedule 2 of the **Draft DCO Revision A [REP1-008]** which states that decommissioning must be no later than 60 years from the state of the final commissioning. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | Therefore the Scheme is not permanent. |
| **Walgrave – Landscape and Visual Impact Assessment Comments [REP1-201]** | | | | |
| SGHS-048 | Landscape and Visual Impact | Loss of surrounding landscape | The route where the pictures were taken is one of our regular walks which we have enjoyed for many years. We particularly enjoy the views included in the photos I sent as we feel they are a typical Northamptonshire mix of arable and grass fields bordered by hedges and trees . There are very few buildings apart from an occasional barn. If the proposed solar development goes ahead, this will be permanently lost. We greatly value the rural nature of the surrounding landscape around Walgrave which we feel improves our quality of life. The nature of the local landscape and views which we value so much will be permanently changed- bringing an industrial character to this walk. We feel that this would greatly diminish any benefit or sense of well being we currently enjoy on this route. | The LVIA **[APP-045]** assesses effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure resulting in Significant adverse effects to landscape character and visual amenity. NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments. The Scheme is not permanent. The application is for a period of up to 60 years operational life. At which point, the development would be required to be decommissioned. This is secured through Requirement 21 in Schedule 2 of the **Draft DCO Revision A [REP1-008]** which states that decommissioning must be no later than 60 years from the state of the final commissioning.<br><br>At decommissioning, agricultural fields would be returned back to agriculture. As infrastructure is removed, there |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | 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 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.<br>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. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| SGHS-049 | Ecology and Biodiversity | Impacts on Birds and Wildlife | We have been living in this rural area for fifty years and together with our family have enjoyed dog walking, horse riding and just walking in and around the fields and especially the "Quiet Lane" that is Newlands Road. If this development goes ahead ,this will never be the same again as it will be extremely noisy and disruptive on wildlife when it is installed and beyond as the panels make a noise themselves. All of this will have a detrimental impact to bird nesting in particular, which in turn has to affect our enjoyment of the countryside with their wonderful song being lessened considerably. Foxes, badgers and muntjacs reside around here and will be confused, frightened and leave the area, in order to find new habitat, which will change the environment. Villagers won't want to walk there and a lot of social cohesion will be lost. It is where you can walk easily and safely just enjoying the sights and sounds of the countryside. | Impacts on wildlife are discussed in **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]**. This sets out impacts on important ecological features, which includes breeding birds, badgers and deer, and associated mitigation measures during the construction and operational phases. Mitigation measures include provision of enhanced foraging and nesting habitats; for some ground-nesting birds there will be a residual adverse effect, but mitigation measures serve to reduce the level of this effect. Retention of wide buffer zones will enable the continued movement of wildlife such as deer, foxes and badgers through the landscape. Overall, whilst some adverse impacts will occur as a result of the Scheme, the majority of residual effects for ecology and biodiversity are neutral or positive. |
| SGHS-050 | Landscape and Visual Impact | Loss of surrounding landscape | If the Solar Farm was to go ahead our house and land would be surrounded by Solar Panels, on A2 this would greatly disrupt our current lovely views that we have over miles of fields. It is a source of great calm and joy to see the changing landscape as the seasons | Please see response to comment SGHS-048. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | change. The colours of the grass and crops and hedgerows. | |
| SGHS-051 | Landscape and Visual Impact | Loss of surrounding landscape | Walking the bridleway CT3 from the Walgrave Hannington road towards the A43 we can see for miles towards the north of this plateau and the large area of A1 will be clearly visible. Further along, the A2 area just beside the track, over bearing high glass panels will dominate the landscape. | Please see response to comment SGHS-048. |
| SGHS-052 | Landscape and Visual Impact<br>Ecology and Biodiversity | Loss of surrounding landscape and habitat | Photo taken from PRoW, Bridleway looking NNW over Site A2 field A2F4 toward Site A. OS Grid reference 819722. The Newland Lane north of Walgrave (area A1) will have glass panels to both east and west of this designated Quiet Lane. These areas will lose the rich source of the changing seasons, textures, colours, sounds and atmosphere of the farming year. New green spring growth, June bringing the scent of grass mown for hay, high summer of waving cereal crops, turning to the sounds of harvest fields and then the earthy cultivating of autumn drilling at the start of the new farming year. | Please see response to comment SGHS-048. |
| SGHS-053 | Ecology and Biodiversity | Impacts on Birds and Wildlife | On a recent trip along the Green Lane, I saw a weasel run across the gateway, the red kites were soaring above and the housemartins diving and swooping | Impacts on wildlife are discussed in detail within **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]**. The majority |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | for insects in the fields which are designated to be covered in Solar Panels. A hare ran at speed across the field in the distance. Land that crops have been grown on for centuries, and part of our countryside heritage, but that will potentially be fenced in and covered with 4.5m high solar panels, and battery storage facility, this makes me feel very sad. | of wildlife species are expected to continue to utilise the operational Sites, and indeed the mass reversion of arable land to permanent pasture is predicted to deliver broad and long-term biodiversity benefits. All species mentioned specifically within this comment have been observed by the Applicant's ecologist within active solar arrays, and no residual adverse effects relating to these species are predicted. |
| **Notes on Ecology Aspects – Dr Linda Twohey [REP1-218]** | | | | |
| SGHS-054 | Ecology and Biodiversity | Wintering Birds | Apparently, which fields are used by these overwintering birds will vary from year to year, according to conditions. Two winters of surveys have now been conducted by GHS at most sites. GHS notes in their Ecology and Biodiversity document, paragraph 9.9.7, that loss of fields identified as FLL could have a significant adverse effect on the populations of golden plover and lapwing associated with the SPA, and that this would be significant at INTERNATIONAL level given the designation.<br><br>GHS identified fields BF3 and EF25 as used by significant numbers of golden plover. They also identified other fields as likely FFL; these were FF1, FF11, | A full assessment of potential impacts on the Upper Nene Valley Gravel Pits SPA/Ramsar site, including the assessment and proposed mitigation associated with Functionally Linked Land (FLL), and other potential impacts such as pollution, is provided in the **Habitats Regulations Assessment (HRA) (Revision A) [REP1-153]**. Where possible, fields identified as FLL are retained, and where mitigation fields are provided for losses, these have been considered carefully in terms of their location, size, habitat type, proximity to disturbance, and other factors. The location of FLL fields and |

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| | | | FF13 and FF15. However, they only intend to retain EF25 (managed as grassland) and FF13 (flower meadow) out of these 6 identified fields; the others will be used for PV panels. They state they will substitute field BF1 for BF3 and that they are almost identical in size, but offer no rationale for the swap. However, if the golden plover had conditions they wanted in BF1, wouldn't they already be using it? Their sightlines for predators, and lack of disturbance are important – these may not be so satisfactory for them. Green Hill Solar also say that they are putting aside a total of 75 hectares for precautionary mitigation across the sites, against the 44 hectares they are covering with PV panels in the possibly linked fields. | details of their size and proposed management is set out in the HRA.<br><br>Creation, management and monitoring of both retained FLL fields and mitigation fields are set out within the provided in the **Outline Landscape and Ecological Management Plan (Revision A) [REP1-137]**. Sections 4.6, 4.7 and 4.9 cover grassland, wetland (wader scrapes) and farmland habitats, which are proposed within the FLL fields. Ecological monitoring proposed for the Scheme post-construction include habitat surveys and a suite of bird surveys in order to assess the implementation of the proposed FLL mitigation and identify any remedial measures required. A full Landscape and Ecological Management Plan with further detail, including costing, will be prepared post-consent - this would be secured through Requirement 7 of the **Draft Development Consent Order (Revision A) [REP1-008]**.<br><br>The mitigation package has been discussed with Natural England and will be agreed through the forthcoming Statement of Common Ground |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | **[EX2/GH8.3.6]**, to be submitted at Deadline 2. |
| SGHS-055 | Ecology and Biodiversity | Effects on flora | Gwent levels findings post-construction include that of severe damage to the flora by the construction process. The ground appeared compacted and the panels have large areas of bare earth under and around them, with brambles taking over (previously grazing marsh habitat). In the GHS Outline Landscape and Ecological Management Plan, diverse meadow creation is proposed beneath panels. In Chapter 4.6.20, management during the first year is stated to be critical to tackle annual or agricultural plants and injurious weeds. Use of herbicides may be necessary, and late season haycuts or grazing by sheep is proposed. This seems at odds with the proposed PV panel size and probable tracking, 4.5 metres, as this would create vast areas where very little light is likely to penetrate, leading to bare earth. At the Llanwern Solar Farm, the panels are stated to be 2 – 3 metres tall and non-tracking, yet have proven bare earth underneath. | Recommendations for the creation and management of habitats within the solar arrays is based on the findings of extensive long-term monitoring of active solar arrays by the Applicant's ecologist, providing a degree of confidence that the proposals are reasonable and practicable. This acknowledges the varied diversity of grassland swards expected beneath/ between solar panels and has been factored into the **Environmental Statement Appendix 9.13 Biodiversity Net Gain Assessment (Revision A) [REP1-043]**, which concludes a significant gain in all habitat unit types. It should be noted that the baseline habitats within the Sites are largely arable, with low biodiversity value, whereas the habitats of the Gwent Levels were of significant ecological value. |
| SGHS-056 | Ecology and Biodiversity | Effects on bat populations | It should then be clear that there are confirmed to be rich populations of diverse bat species on all the GHS Sites | There is research to suggest a potential displacement effect of arrays on foraging and commuting bats, with |

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| | | | and BESS, and that the only evidence available at present is that bats can be severely affected by solar farm installations. Therefore the required precautionary principle should be applied, and development not permitted where these protected bat species have been identified, with particular concern for the rare Barbastelle. | reduced activity levels observed by some species among arrays compared to control sites. However, numerous issues have been identified with this study, including a lack of baseline (pre-development) data on both habitat type and bat activity, as well as a short window of sampling. Furthermore, the microphone height for the detectors was set at 1.27m (around the mid-height of panels), which may have precluded the detection of bats in the solar arrays and account for the observed apparent reduction in activity levels. More research is needed in this area, however, it is probable that any impacts on bats will be largely neutral; particularly when considering the likely higher value of the habitats present within the operational site (predominately comprising permanent grassland) over the baseline of largely arable land, together with the large development-free buffer zones which are comparatively wider than the field margins present at baseline), and the retention and enhancement of the most valuable habitats within the Sites. As a result, no significant adverse effects associated with the constructed Scheme for foraging/commuting bats are currently anticipated. Effects on bats are |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | discussed in further detail in **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-034].** |
| SGHS-057 | Cultural Heritage | Mears Ashby Conservation Area Character Appraisal | A document submitted as part of response to Deadline 1 Submission.<br>[REP1-213] | The Applicant notes the document.<br>The Mears Ashby Conservation Area Character Appraisal was used to inform the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]**, which is supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]**. |
| SGHS-058 | Cultural Heritage | Church of St Michael – Official List entry for Historic England | A document submitted as part of response to Deadline 1 Submission.<br>[REP1-210] | The Applicant notes the document.<br>The list entry for the Church of St Michael in Lavendon (NHLE: 1212619) was used to inform the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]**, which is supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]**. |
| SGHS-059 | Cultural Heritage | Lavendon Conservation Area | Lavendon Conservation Area Map submitted as part of response to Deadline 1 Submission.<br>[REP1-209] | The Applicant notes the document.<br>The Lavendon Conservation Area Character Appraisal was used to inform the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]**, which is supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]**. |

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| SGHS-060 | Cultural Heritage | Historic England: The Setting of Heritage Assets | Guidance note submitted as part of response to Deadline 1 Submission.<br>[REP1-212] | The Applicant notes the document.<br>The assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]**, which is supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]**, was undertaken in line with Historic England GPA3 the Setting of heritage Assets. |
| SGHS-061 | Cultural Heritage | Historic England - A Strategy for Wellbeing and Heritage | Guidance note submitted as part of response to Deadline 1 Submission.<br>[REP1-211] | The Applicant understands that, as stated on Page 6, the Historic England Strategy for Wellbeing and Heritage (2022-2025) forms the Historic England strategy for well being and heritage and as such does not have any material relevance to the Green Hill DCO application:<br>*"This strategy is primarily for our teams at Historic England. It aims to achieve positive wellbeing outcomes for people through engagement with heritage and through our work. It will enable us to collect evidence, model good practice and learn from our experience. We will use the knowledge we create to improve what we do. We will share this learning with our partners in heritage and in healthcare to achieve stronger and more long-lasting outcomes for people."*<br>Furthermore, an assessment of mental health and wellbeing has been |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | undertaken in **ES Chapter 18: Human Health [APP-055]**, wherein the consideration of cultural heritage falls under the wider term of impacts upon a community's 'identity and culture'. |
| SGHS-062 | Cultural Heritage | Mears Ashby Heritage Report | Mears Ashby Hall Northamptonshire Heritage Report submitted as part of response to Deadline 1 Submission.<br>[REP1-214] | The Applicant notes the document.<br>Please see **Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Point**s **[REP1-162]** |
| SGHS-063 | Ecology and Biodiversity | Natural England Technical Information Notes | Advice notes submitted as part of response to Deadline 1 Submission.<br>[REP1-223]<br>[REP1-224] | The Applicant notes the documents. Arable reversion will be conducted in accordance with the measures detailed within **Outline Landscape and Ecological Management Plan (Revision A) [REP1-137]**. A regime of monitoring is set out to identify and remediate any issues over the course of habitat establishment, with adaptative management to be implemented. |
| SGHS-064 | Ecology and Biodiversity | Friends of the Gwent Levels | A document regarding 'A Temporary Halt on Major Development on the Gwent Levels SSSI submitted as part of response to Deadline 1 Submission.<br>[REP1-217] | The Applicant notes the document but would highlight that the Llanwern Solar scheme is entirely separate from the proposed Green Hill Solar Scheme, with a very different context. Each development must be considered on its own merits, and the Applicant has commissioned extensive surveys and assessments to evaluate ecological |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | impacts relating to the proposed Scheme. These are discussed in detail within **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]**. |
| SGHS-065 | Planning | Wessex Solar Energy Application | Guidance note submitted as part of response to Deadline 1 Submission.<br>[REP1-222] | The Applicant notes that this is a decision by the Welsh Minister for Climate Change, in the context of "the Welsh Government's well-being objectives focussed on and addressing the climate and nature emergency". The Scheme is located in England, and must be determined in accordance with the National Policy Statements for Energy. The policies of the Welsh Government are not relevant to the Scheme. |
| SGHS-066 | Planning | Mead Realisations Limited V SSHCLG 2024 EWHC 279 (Admin) | Guidance note submitted as part of response to Deadline 1 Submission.<br>[REP1-216] | The case of Mead Realisations Limited v SSHCLG clarified the relationship between the Planning Practice Guidance (PPG) and the National Planning Policy Framework (NPPF), confirming that the PPG has a role in clarifying the policy in the NPPF. The case found that the guidance in the PPG on the application of the sequential test was consistent with the policy in the NPPF.<br>As a nationally significant infrastructure project, the application for the Scheme will be determined in accordance with |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | the National Policy Statements for Energy. The NPPF and PPG may be important and relevant considerations in the Secretary of State determining the application for the Scheme. |
| SGHS-067 | General Matters | ExA Site Visit Locations | Documents submitted as part of response to Deadline 1 were also submitted at Procedural Deadline A and have been responded to within Deadline 1 documents.<br>[PDA-005]<br>[PDA-006] | The Applicant notes these documents and refers to **Draft Itinerary for Accompanied Site Inspection (ASI) [REP1-164]** |
| SGHS-068 | Major Accidents and Disasters | Lithium-ion Battery Energy Storage Systems (LiBs) | A briefing note on Lithium-ion Battery Energy Storage Systems (LiBs) submitted as part of response to Deadline 1 Submission.<br>[REP1-219] | The Applicant considers that these matters are dealt with by the **Outline Battery Safety Management Plan Revision A [REP1-143].** |

## 3.2 Kate Gregory and Richard Gregory – Lower Farm Livery Stables

**Table 3.2: REP1-262 & REP1-283**

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
|---|---|---|---|---|
| KGRG-001 | General Matters | Landscape and Visual Impacts<br>Glint and Glare | The increasing deployment of large-scale photovoltaic (PV) solar farms in rural and countryside locations have raised concerns regarding visual impact, particularly the issue of glint and glare from panel surfaces. While solar technology has advanced significantly in efficiency and coatings to reduce reflection, these effects cannot be fully eliminated. This opinion evaluates the potential impacts of glint and glare, their measurement, the limitations of current photovoltaic manufacturing processes, as well as visual impact matters that may have been omitted from reports. | The Applicant notes this comment. |
| KGRG-002 | Glint and Glare | Nature of Glint and Glare | Glint and glare refer to the unwanted reflection of sunlight from the surfaces of solar panels. Glint is a brief, intense flash of reflected light, often associated with specific geometries between the sun, panel, and observer. Glare is a sustained reflection that can cause visual discomfort or impairment. While solar modules are generally designed with anti-reflective coatings to maximize | The Applicant notes this comment. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | absorption, reflection is unavoidable to some degree because no surface can absorb 100% of incident light across all wavelengths and angles. Current reflection values for PV panels are typically between 2–10% of incoming solar radiation. | |
| KGRG-003 | Glint and Glare | PV Panels and Light Absorption | It is not known whether Anti-Reflective (AR) coatings, surface texturing or Interdigitated Back Contact (IBC) cells will be used – there appears to be no investigation into the pros and cons of different solar panels, nor any recommendations in this regard, included in the technical reports, just some general statements. The choice of the actual panel itself may prove to be important, and certainly necessary in order for a more accurate representation of the impact of the proposed solar panels. It is acknowledged that no current photovoltaic panel can completely absorb all incident light. The theoretical maximum efficiency of a single-junction silicon solar cell is limited by the Shockley-Queisser limit, which caps efficiency at approximately 33.16%. The remaining energy is lost as heat or is | For the purpose of the glint and glare assessment, 'Smooth glass with Anti-Reflective Coating (ARC)' modules have been used to model the surface material of the arrays in order to ensure the worst case scenario is assessed.<br><br>The technical specification of the panel will be chosen at detailed design stage in line with the parameters assessed and defined in the **Concept Design Parameters and Principles Document Revision A [REP1-151].** |

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| | | | reflected. While manufacturers have reduced reflectance to as little as 2% for some panels under specific conditions, a small amount of reflection is inherent in the physics of light-matter interaction. Complete absorption would violate fundamental principles of thermodynamics and optics. | |
| KGRG-004 | Glint and Glare | Measurement and Assessment Methodology | While light output is commonly expressed in lumens or lux, these units do not fully capture the specific visual impacts of glare. Regulatory assessments instead use luminance (cd/m²) and geometric solar modelling (such as the Federal Aviation Administration's Solar Glare Hazard Analysis Tool, which is also referenced in UK planning contexts). It is not clear if this method of determining the extent of light output has been included in the Developer's reports. | The **Glint and Glare Assessment [APP-052]** has been undertaken using ForgeSolar. This modelling software is built with Federal Aviation Administration's Solar Glare Hazard Analysis Tool (SGHAT) technology. |
| KGRG-005 | Glint and Glare | Time-of-Day and Seasonal Effects | In a rural UK context:<br>• Morning glint from east-facing arrays will coincide with peak commuting periods and agricultural operations.<br>• Evening glare from west-facing panels may affect highways and rural | The Applicant notes this comment. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | residences during sunset, raising potential for visual hazard.<br>• During winter months, when the solar path is lower in the sky, the risk of glare is materially increased.<br>These factors raise legitimate planning concerns under the National Planning Policy Framework (NPPF) Paragraph 185, which requires that new development "avoid noise and other adverse impacts on health and quality of life" — including light pollution. | |
| KGRG-006 | Glint and Glare | Panel Degradation and Long-Term Risk | Anti-reflective coatings applied to PV modules are not permanent and deteriorate over time due to:<br>• Weathering and abrasion from rain, frost, and windborne particles;<br>• Soiling from dust, pollen, and agricultural activity;<br>• Panel discolouration and surface micro-cracking over the lifespan of the installation.<br>Such degradation can increase stray reflections, both specular and diffuse, thereby worsening glare impacts as the development ages. This raises compliance concerns with NPPF Paragraph 55, which requires | As part of the maintenance phase, regular inspection will be undertaken of all equipment on site to identify any damage and ad-hoc replacement will be completed as necessary.<br>Maintenance measures are secured through the **Outline Operational Environmental Management Plan [REP1-131]**.<br>By Year 15, screening planting will be fully established (target height between 4-4.5m for hedgerow, with trees and woodland anticipated to have reached 7.5m) reducing the chance of increased glare in the event of any panel deterioration. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | developments to be "sustainable for the lifetime of the development," not merely at the point of installation. As per comments in Section 4.0 there appears to be no investigation into the pros and cons of different solar panels, nor any recommendations in this regard, included in the technical reports. | Measures for the on going management, monitoring and replacement of landscape and ecological mitigation are set out in the **OLEMP [REP1-137],** ensuring the long lasting effectiveness of the landscape mitigation. |
| KGRG-007 | Landscape and Visual Impacts | Visual Impact | A summary of the viewpoints used for Green Hill Site G have been shown below. What is entirely misleading is that the viewing points have been taken from the boundaries of the development only, not from the perspective of the village.<br>- From VP40, the following images were provided (2/3 of a 360° view pointing inwards to the development)<br>- From VP41, the following image was provided (2/3 of a 360° view pointing inwards to the development). Only one spliced photo has been included, completely misrepresents the actual situation, and totally ignores a viewpoint that includes Three Shires Way | The LVIA **[APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within **ES Appendix 8.1 [APP-078 & APP-079]**, which has been progressed and agreed with the Local Planning Authorities.<br>The LVIA **[APP-045]** includes a total of 64 viewpoints covering the Study Areas for the Sites and the Cable Route Corridor. Viewpoint locations are set out within Table 8.5 of the LVIA. Viewpoint locations are shown on GH6.4.8.10 Environmental |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | What is concerning is that all the visual receptor points have been taken from the edges of the development, pointing inwards, which doesn't actually represent reality and provides a very misleading documentation of visual impact. | Statement Figure 8.10 Viewpoint Locations **[APP-308]**.<br><br>These viewpoints comprise initial viewpoints selected for the purpose of the assessment and likely to be affected by the Scheme and then additional viewpoints provided as part of the Section 42 Consultation. The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation, where a total of 13 additional viewpoints have been included and photography undertaken, these are identified as Viewpoint Number NN1 – NN13. Viewpoint photography and photomontages are included within Figure Series 8.14 **[APP-334 to APP-400]**<br><br>A total of 26 AVR level 3 montages have been produced using summer and winter photography as illustrated in Figure series 8.14 and as set out within Table 8.6 of the LVIA **[APP-045]**.<br><br>Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | with the Landscape Officer representatives for North Northamptonshire and Milton Keynes City Council. The Applicant is currently in discussions with MKCC Officers following their request for two additional viewpoints and photomontages looking across Site G.<br><br>The Photography and Photomontage Methodology is included within Appendix 8.1 **[APP-078** and **APP079]**. The photography and visualisation team consists of Lanpro and MSEnvision who are leading photography and visualisation specialists operating across the UK. Lanpro have worked closely with Mike Spence of MSEnvision who has led the photography and 3D modelling process.<br><br>Visualisations have been produced in accordance with the Landscape Institute TGN 06/19 and the developing understanding of visualisation work. The resultant visualisations are highly accurate. For the Green Hill Solar Project, MSEnvision (MSE) constructed a full 3D model of the Scheme using the layout data supplied by Lanpro, OS |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | MasterMap for geo-referencing and Environment Agency LIDAR DTM (2m). 3D point data was used for checking horizontal and vertical alignment. Images of the 3D model utilised within the visualisations can be see within the Photography and Photomontage Methodology is included within Appendix 8.1 **[APP-078** and **APP079]** on pages 4 to 9. |
| KGRG-008 | Landscape and Visual Impacts | Horizon Distortion | Apart from the visual impact assessment, it is not clear if the issue of horizon loss or horizon distortion has been included. Horizon loss or horizon distortion is the adverse aesthetic or perceptual impact that occurs when an introduced artificial structure (such as a building, solar array or wind turbine) intercedes or obstructs the natural, uninterrupted line of sight to the horizon, sky, or continuous natural ground plane. It is a form of visual degradation where the perceived boundary between land (or water) and sky is broken, flattened, or replaced by a human-made element, thereby reducing the sense of spaciousness, visual clarity, and scenic quality. | The LVIA **[APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within **ES Appendix 8.1 [APP078 & APP079]**, which has been progressed with, and agreed with the Local Planning Authorities.<br><br>As set out within the LVIA Methodology **ES Appendix 8.1 [APP078 & APP079]**, visual effects relate to changes in available views |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | of the landscape and the effect of those changes on people, including:<br>• The direct effects of the Scheme on the content and character of views through the intrusion or obstruction and/or the change or loss of existing elements; and<br>• The overall effect on visual amenity, be it degradation or enhancement.<br>The visual effects may include the following:<br>• Visual effect: a change to an existing static view, sequential views, or wider visual amenity as a result of the Scheme; or<br>• the loss of particular landscape elements or features already present in the view.<br>The complete approach to assessing Visual Effects is set out within the LVIA Methodology **ES Appendix 8.1 [APP078 & APP079].** |
| KGRG-009 | Glint and Glare | Glint and Glare modelling | GHS have not undertaken any modelling for users or sensitive receptors on the Three Shires Way. They argued this was unnecessary | The assessment considered receptors along Public Rights of Way (PRoW) and horse facilities. In line with industry guidance, the |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | due to the low number of users and because individuals could "easily avoid" Glint and Glare effects. | assessment considered the impacts of glint and glare on the safety of these receptors. As outlined in **ES Chapter 15 Glint and Glare [APP-052]** in section 15.4.21, the sensitivity of PRoW and horse facilities have been categorised as 'low', and the maximum magnitude of impact for PRoW and horse facilities is considered 'low'. As such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms.<br><br>In particular, the British Horse Society[1] recognises that glint and glare does not have any detrimental effect on horses or equestrian users of PROWs. |
| KGRG-010 | Noise and Vibration | Construction noise | Construction will cause continuous disruption for approximately two years along the TSW and the connecting bridleway from Castle Road, Lavendon. During this time, the area will be subject to noise, heavy machinery, fencing, signage, and worker activity — all of which will significantly affect users of the TSW, | The cumulative impacts associated with construction are acknowledged by the Applicant, however as noted in the Advice on Solar farms near routes used by equestrians by the British Horse Society '*There will be noise during construction, particularly from pile driving, which is unpleasant and potentially distressing, but its* |

[1] British Horse Society (2025). Advice on bridleways and other access: 1. Advice Notes – Solar farms (August 2025). Available at www.bhs.org.uk/go-riding-and-learn/access-and-bridleways-advice/

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | especially horse riders. Horses are highly sensitive to environmental change. Sudden or unfamiliar stimuli — such as machinery, construction noise, or newly installed signage — can easily startle even well-trained horses, posing serious risks to riders and other users. In addition, the horses grazing in paddocks adjacent to Site G13 have been overlooked. Construction noise and vehicle movement could startle them, potentially leading to injury. | *temporariness means it is not usually a material planning consideration'*.<br><br>Please refer to the **Applicant's Response to Relevant Representation [REP1-161]** at 'HUM-001' in respect of access to PROWs.<br><br>The **Outline Public Rights of Way and Permissive Path Management Plan Revision A [REP1-147]** provides a framework for the management of routes throughout the Site. The key objective is to ensure that PRoWs remain open, and safe at all times throughout the Scheme's construction, operational and decommissioning phases, with the same applying to permissive paths during the operational phase. |
| KGRG-011 | Landscape and Visual Impacts | Visual Impacts | The completed development will drastically alter the local landscape, replacing open countryside with an industrial landscape. Even if horses tolerate the visual changes, many riders will no longer find the experience enjoyable. The prospect of riding the TSW which will effectively become a tunnel surrounded by 4.5m panels, will not be an attractive one. The area has | 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, |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | already been acknowledged by the Secretary of State in 2013 as having attractive views over open countryside and he turned down an appeal by NPower to place 3 turbines on site G due to the visual impact and that "the experience and recreational amenity of the Three Shires Way would be seriously affected by the development and would materially damage the scenery." | host authorities, local communities, and residents.<br><br>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.<br><br>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.<br><br>The Three Shires Way passes through Site G along PRoW MK\|Lavendon\|015#2 (TP227) and PRoW MK\|Lavendon\|002 (TP217). Panels have been set back between 25m and 55m from this route, and |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | 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. Alongside the route, the landscape proposals are for a proposed new hedgerow with irregularly spaced hedgerow trees providing enclosure and separation from the array. Once established, 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.<br><br>The LVIA recognises that these changes would adversely change the character of the PRoW in part however once vegetation had established, this would be of a similar character to that found within the woodland setting to the north. The LVIA also recognises that filtered glimpses of proposed infrastructure would likely still be possible following establishment of the green corridor, with infrastructure would be more visible in winter months. |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| KGRG-012 | Hydrology, Flood Risk and Drainage | Green Hill G | These proposals have not been incorporated into the GHS formal planning submission for Area G, specifically sub-area G13. The reason provided is that these fields are classified as Flood Zone 1, with permeable ground conditions, and that studies indicate a negligible impact on flood risk, both on- and off-site. We disagree with this conclusion. Area G has complex, largely non-permeable ground conditions that lead to significant surface water run-off during intense rainfall events, posing a genuine flood risk. | Area G, including sub area G13, has been assessed within the **Flood Risk Assessment and Drainage Strategy Report [REP1-053]** and **Annex I Green Hill G [APP-107]**, which form part of the formal planning submission.<br><br>The FRA does not assume that Area G has high permeability. It recognises that the existing agricultural land has mixed and often compacted soils, typical of arable regimes, with low infiltration and periodic surface water accumulation during intense rainfall. These baseline conditions are characteristic of the current land use. The development does not introduce impermeable surfacing across the panelled areas and does not change existing drainage pathways.<br><br>A key change under the Scheme is the transition from arable cultivation to permanent grassland managed without repeated trafficking. Evidence reported in Cook and McEwan (2013) indicates that permanent grass cover reduces soil compaction, increases aggregate stability and supports higher infiltration capacity when compared with intensively cultivated |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | arable land. This aligns with the position in **NPS EN-3 paragraph 3.10.75**, which notes that rainfall from solar PV panels drains to the existing ground and that the hydrological effect is not, in general, significant.<br><br>Access tracks are permeable and the construction phase is controlled through the **Outline Construction Environmental Management Plan [REP1-146REP1-131]** and **Outline Soil Management Plan [APP-550]**, which require protection and reinstatement of soils to prevent any lasting compaction.<br><br>On this basis, the FRA concludes that the Scheme replaces an intermittently compacted agricultural baseline with a more stable grassland surface and does not exacerbate runoff or increase flood risk on site or downstream. |
| KGRG-013 | Hydrology, Flood Risk and Drainage | Flood Risk Assessment (FRA) | A site-specific Flood Risk Assessment (FRA) carried out at Lower Farm in 2016 confirmed that under a 1-in-200-year flood event plus 60% climate change allowance, the property would flood despite existing defences. These defences were subsequently redesigned and | The 2016 site specific Flood Risk Assessment undertaken for Lower Farm was prepared for a separate development, to a different set of design standards, and for a location outside the Green Hill Order Limits. It does not form part of the Green Hill assessment and has no bearing on |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | rebuilt, and revised modelling confirmed that stormwater under the same criteria would be contained within the 6mwide, 2m-deep channel, flowing beneath the access bridge at 6 m³/s.<br><br>New Environment Agency flood criteria issued in 2025 have since changed the standard to a 1- in-100-year event with a 45% climate change uplift, which GHS has applied to some areas of the solar farm. | the conclusions reached in the **Flood Risk Assessment and Drainage Strategy Report [REP1-053]** or the parcel specific assessment for Area G in **Annex I [APP-107]**.<br><br>The Green Hill FRA applies the Environment Agency's current climate change guidance. For fluvial assessment this requires use of the **1 % AEP + 45% CCA** This is the modern requirement at the time of preparing **[REP1-053REP1-053]** and is used consistently across the application area. The fact that the historic Lower Farm modelling used a **0.5 percent AEP + 60 percent** allowance reflects the older guidance that applied at that time, not a discrepancy in the Green Hill assessment.<br><br>Most importantly, the Scheme does not change the hydrological inputs to Lower Farm or any other downstream receptor. The development does not introduce impermeable surfacing across the solar array, the land beneath the panels remains as permeable grassland, access tracks are permeable, and runoff from associated infrastructure is controlled |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | to greenfield rates in accordance with **[REP1-053REP1-053]**. Construction stage soil effects are temporary and are remediated through the measures secured in the **Outline Construction Environmental Management Plan [REP1-146REP1-146]** and **Outline Soil Management Plan [APP-550]**.<br><br>Because the Scheme retains the existing drainage pathways and does not increase the rate or volume of runoff generated by the site, the Green Hill FRA confirms that the development will not increase flood risk to Lower Farm or any other downstream location irrespective of the design criteria used in the historic 2016 study. |
| KGRG-014 | Hydrology, Flood Risk and Drainage | Engineering Report | Attached to REP1-283 is Engineering Report: Assessment of Surface Water Runoff from Proposed Green Hill Solar Farm (Green Hill G) [REP1-215] | The Applicant has responded to issues raised within this report in 'SGHS-001' to 'SGHS-012' above. |

## 3.3 Keith Burrell

**Table 3.3: REP1-301**

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| KB-001 | Glint and Glare | Glint and Glare assessment | I am raising concerns regarding Q15 Glint and Glare about the acceptance of the Technical Basis for Proposal to Install Photovoltaic Solar Panels when the Technical Specification of the Fixed and Tracking Solar Panels is completely unstated, whether there will be a lower Specification of Solar Panels at different Sites or even a mixture of Specification within Sites. A key element absent is the 'anti-reflectance' coating / technology that is proposed, its' Performance over Time' and lack of Aerial Monitoring of Panel Anti Reflectance Deterioration from Specification as a basis for Standards in a Maintenance Policy as an answer to the Significant Issue of 'GLINT & GLARE' (G&G) to Airspace Users and Observers on the Ground etc. | The ES adopts a maximum design scenario approach, assessing the Scheme on the basis of the maximum project design parameters relevant to the technical discipline i.e. the reasonable worst-case scenario for impacts (known as the "Rochdale Envelope"). The Application has incorporated flexibility into the design of the Scheme to allow the latest technology to be installed at the time of construction.<br><br>Details of the panels are outlined and secured in **Concept Design Parameters and Principles [APP-561]** under Work 1.<br><br>The draft DCO seeks consent for both tracker panels and fixed panel options within the array Sites. The use and distribution of these across the Sites will be subject to further consideration as part of the detailed design of the Scheme. |
| KB-002 | Glint and Glare | Glint and Glare assessment | As a matter of Principle the Planning Inspectorate should appreciate that the maximum effectiveness of anti-reflective coating / technology is when the Sun is | The Applicant notes this comment, please see response to KGRG-003 and KB-001. |

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| | | | Vertically above with respect to the plane of Solar Panel Surface. This means that for the majority of the time Fixed Panels will generate G&G dependent on the Time of Day and Time of Year with respect to the Observer's Position in the Airspace and on the Ground. | |
| KB-003 | Glint and Glare | Glint and Glare assessment | At Schiphol Airport, Amsterdam earlier this year Runway Closures due to Solar Panel Farm G&G due to time of year Sun's height above horizon affecting Pilots etc. Big legal issue about how much the Dutch Tax Payer will compensate Private Company for forced removal / modification of Panels (78,000 in 2 Fields and 150,000 in 2 other fields) on Aviation Safety grounds when they were granted Official Permission. Will the UK Tax Payer pick up the Bill for similar Planning Approvals found to affect Aviation Safety or will Aircraft Safety be irrelevant? | The Schiphol case involves a very specific combination of solar panel design and positioning relative to the runway that is not replicated in any existing or proposed solar farm in the UK, including Green Hill. The solar panels in the 'De Groene Energie Corridor' development are oriented south west/north east, and are double-sided – they have panels facing north east as well as panels facing south west. This means that the north east-facing panels reflect the sun in a northerly direction in the morning. The development is located approximately 1500m north of the threshold of Runway 18R (the "Polderbaan runway") at Schiphol Airport. Glare can affect pilots on final approach to Runway 18R at approximately two miles from touchdown.<br><br>There are no solar developments in the UK with double-sided panels, and none with northward-facing panels. All |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | airfields in the vicinity of the Green Hill Solar development are unlicensed aerodromes usable only in visual conditions by light aircraft. The circuit patterns and approaches to these airfields are flown much closer into the airfield than at major commercial airports, with the final approach rarely being joined further out than one mile from touchdown. Consequently, the potential for glare from solar panels to affect pilots operating at these airfields is less.<br><br>The CAA continues to advise that they have received no reports of glare from solar farms affecting pilots. Research has found no evidence that solar farms at 65 airfields in the UK with existing solar farms in their vicinity have generated any adverse glare effects on pilots. This supports the advice in the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) that "Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant |

| Reference | Theme | Issue | Comments/Issue Raised | Applicants Response |
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| | | | | impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms." |
| KB-004 | Glint and Glare | Glint and Glare assessment | Sywell Aerodrome and Engine Failure After Take Off, EFATO situations which the Safety Procedures for the Pilots are totally undermined due to existing farmland, open spaces are covered with thousands of Solar Panels and their Infrastructure. How can Green Hill Solar Farm Developers stipulate the Pilot will be able to avoid their widespread Infrastructure Installations in the surrounding countryside / farmland and Pilots faced with high levels of G&G due to EFATO low altitude and risk of a serious crash? Additionally, Sywell Aerodrome hosts regular Red Arrows Air Displays, not Fly Pasts, at very low level. What is the Safety Impact on these Displays and others utilising VFR, Visual Flight Rules with the High Risk of Glint and Glare affecting Pilots / Aircraft flying in Close Formation with so much acreage coverage in Solar Panels? | The Applicant has revised the proposed layout of the solar farm in order to address potential issues with forced landing options for single-engined aircraft suffering an engine failure after take-off from runway 05 at Sywell Aerodrome and runway 16 at Easton Maudit airstrip. Solar panels have been removed from those areas in order to maintain safe forced landing areas. These layout changes have been approved by the operators of the aerodromes concerned.<br><br>Concerns relating to potential glare effects on the Red Arrows and RAF training flights were raised by a Lincolnshire MP in the House of Commons on 15 May 2025. RAF Waddington – the base of the Red Arrows – and the nearby training bases at RAF Cranwell and RAF Barkston Heath have several solar farms in their vicinity. All solar developments in the vicinity of military airfields are required to consult the Ministry of Defence. Green Hill Solar |

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| | | | | is not located near any military airfields. There is no evidence of solar farms generating adverse glare effects on military pilots. |