

# **Green Hill Solar Farm**

## **EN010170**

### **The Applicant's Responses to Written Representations at Deadline 1**

Prepared by: Lanpro Services

Date: November 2025

Document Reference: EX2/GH8.1.13

The Infrastructure Planning (Examination Procedure) Rules 2010

Rules 8(1)(c)



## Contents

<u>1</u>	<u>Introduction</u>	<u>4</u>
1.1	Purpose of the Document	4
1.2	Structure of the Report	4
1.3	Tables of Organisations Submitting Written Representations	6
<u>2</u>	<u>The Applicant's Responses to the Host and Neighbouring Local Authorities</u>	<u>10</u>
2.1	West Northamptonshire Council	10
<u>3</u>	<u>The Applicant's Responses to Statutory Consultees, International Agencies, Undertakers, and Elected Representatives with whom the Applicant has Undertaken a Statement of Common Ground</u>	<u>11</u>
3.1	National Grid Electricity Transmission Plc	11
3.2	National Highways	49
3.3	Natural England	57
<u>4</u>	<u>The Applicant's Responses to Other Statutory Consultees, International Agencies, Undertakers, and Elected Representatives</u>	<u>68</u>
4.1	CPRE Northamptonshire	68
4.2	National Grid Electricity Distribution (East Midlands) plc	143
4.3	UK Health Security Agency	145
<u>5</u>	<u>The Applicant's Responses to Parish Councils, Parish Meetings, or Neighbourhood Community Groups</u>	<u>146</u>
5.1	Bozeat Parish Council	146
5.2	Easton Maudit Parish Meeting	163
5.3	Grendon Parish Council	173
5.4	Lavendon Parish Council	198
5.5	Scaldwell Parish Council	210
5.6	Stop Green Hill Solar	222
5.7	Walgrave Parish Council	298
5.8	Wellingborough Town Council	313
5.9	Wellingborough Walks Action Group Ltd	314
<u>6</u>	<u>The Applicant's Responses to Persons Whose Interests would be Affected by The Order</u>	<u>325</u>
6.1	Shena Howell	325
6.2	Smith Family and PS Smith & Son	328
6.3	Trescella Elderton & Ben Elderton	330
<u>7</u>	<u>The Applicant's Responses to Relevant Representations by Theme</u>	<u>343</u>
7.1	Agriculture and Soils	343
7.2	Alternatives and Design Evolution	351
7.3	Climate Change	353
7.4	Community Benefits	354
7.5	Compulsory Acquisition	356
7.6	Consultation	357
7.7	Cultural Heritage	358
7.8	Ecology and Biodiversity	360
7.9	Energy Need and Policy	363
7.10	General Matters	365
7.11	Glint and Glare	368



7.12	Ground Conditions	375
7.13	Human Health	377
7.14	Hydrology and Flood Risk	379
7.15	Landscape and Visual Impact	385
7.16	Major Accidents and Disasters	388
7.17	Noise and Vibration	396
7.18	Other Environmental Matters	400
7.19	Principle of Development	402
7.20	Socio-Economics, Tourism and Recreation	404
7.21	Transport and Access	407



## Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 2

### The Applicant's Responses to Written Representations at Deadline 1

#### Prepared by

Name: Anna Rowan / Charlotte Astrella

Job title: EIA Consultant / Senior EIA Consultant

#### Approved by

Name: Jane Crichton

Job title: Associate Director

Revision	Date	Prepared by	Approved by
Original	19/11/2025	AR / CA	JC



## 1 Introduction

### 1.1 Purpose of the Document

- 1.1.1 This document provides Green Hill Solar Farm Limited (the 'Applicant's') response to the Written Representations (WRs) submitted 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 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]**.
- 1.1.3 A total of 76 WRs and other documents were submitted to the Examining Authority by Interested Parties in response to the Scheme. WRs were published on 12 November 2025 to the Planning Inspectorate's website (PINS reference: EN010170).

### 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:
- **Table 1.2** lists the host local authorities (Milton Keynes City Council, North Northamptonshire Council, and West Northamptonshire Council) that have made WRs or submitted other documents. The Applicant notes that Bedford Borough Council, the nearest neighbouring authority, have not made a representation at this stage. These responses are analysed and responded to in full in **Section 2** of this document.
  - **Table 1.3** lists all WRs and other documents received from statutory consultees, international agencies, undertakers, and elected representatives with whom the Applicant has undertaken a Statement of Common Ground. These responses are responded to in full in **Section 3** of this document.
  - **Table 1.4** lists all WRs and other documents received from other statutory consultees, international agencies, undertakers, and elected representatives. These responses are responded to in full in **Section 4** of this document.
  - **Table 1.5** lists the WRs and other documents received from parish councils, parish meetings, or neighbourhood community groups. These responses are responded to in full in **Section 5** of this document.
  - **Table 1.6** lists WRs and other documents received from those whose interests would be affected by the Order (as listed within the **Book of Reference [REP1-012]**). These responses are responded to in full in **Section 6** of this document.
  - **Table 1.7** lists the Theme Options in which WRs and other documents received from members of the public and all remaining organisations and businesses are categorised into and responded to in **Section 7** of this document.





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

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

**Table 1.1: List of Acronyms for Submission Documents**

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



### 1.3 Tables of Organisations Submitting Written Representations

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

Examination Library Reference	Acronym	Written Representations Received from
REP1-173	WNC	West Northamptonshire Council

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

Examination Library Reference	Acronym	Written Representations Received from
REP1-177	NGET	National Grid Electricity Transmission Plc
REP1-180	NH	National Highways
REP1-182	NE	Natural England

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

Examination Library Reference	Acronym	Written Representations Received from
REP1-246	CPRE	Campaign for the Protection of Rural England: Northamptonshire
REP1-302	NGED	National Grid Electricity Distribution (East Midlands) plc
REP1-183	UKHSA	UK Health Security Agency

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

Examination Library Reference	Acronym	Written Representations Received from
REP1-184	BPC	Bozeat Parish Council
REP1-186	EMPM	Easton Maudit Parish Meeting
REP1-187	GrPC	Grendon Parish Council
REP1-188	LaPC	Lavendon Parish Council
REP1-189	ScPC	Scaldwell Parish Council
REP1-192	SGHS	Stop Green Hill Solar
REP1-190	WaPC	Walgrave Parish Council



Examination Library Reference	Acronym	Written Representations Received from
REP1-191	WTC	Wellingborough Town Council
REP1-299	WWAG	Wellingborough Walks Action Group Ltd

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

Examination Library Reference	Acronym	Written Representations Received from
REP1-293	SHo	Shena Howell
REP1-296	SMI	Smith Family and PS Smith & Son
REP1-298	ELD	Trescella Elderton & Ben Elderton

**Table 1.7: List of Written Representations Received from Members of the Public and All Remaining Organisations and Businesses Responded to in Section 7.**

Examination Library Reference	Written Representations Received from
REP1-232	Andrew Morgan
REP1-233	Angela Parker
REP1-234	Angela Watson
REP1-235	Barrie Macey
REP1-236	Ben Elderton
REP1-237	Cameron James Woods
REP1-238	Carrie-Anne Camfield
REP1-239	Catherine Mordue
REP1-240	Chris Wyman
REP1-241	Christopher Paul Robinson
REP1-243	Christopher Rose
REP1-244	Claire Maria Green
REP1-245	Cllr Debbie Whitworth obo residents of Lavendon
REP1-249	Dale Brown
REP1-250	Dara Masterson Jones
REP1-251	Dr Gordon Thomas Mellor
REP1-252	Eliza Mary Wyldes
REP1-253	Gerald Mark Couldrake





Examination Library Reference	Written Representations Received from
REP1-254	Gillian May Isobel McClelland
REP1-256	Helen Wyman
REP1-257	Joanne Prestidge King
REP1-258	John Stamp
REP1-259	Jonathan Brock
REP1-260	Jonathan Lancaster-Smith
REP1-261	Karen Rainbow
REP1-262	Kate Gregory
REP1-263	Kelly Teresa Booth
REP1-264	Kerrie Barnett
REP1-265	Kevin John Potts
REP1-266	Laura Dawn Cooper
REP1-267	Lisa Rowlinson
REP1-268	Mark Leabon
REP1-270	Martin Kelly
REP1-271	Mary Rogers
REP1-272	Michael Griffiths
REP1-273	Monika Spademan
REP1-274	Nick Masterson Jones
REP1-275	Nicola Nimmo
REP1-276	Nigel Thornton
REP1-277	Pamela Blomfield
REP1-278	Paul Knight
REP1-279	Paul Martin Lucas
REP1-280	Philip Mason
REP1-281	Revd Katrina Mary Hutchins
REP1-282	Richard Ellis
REP1-283	Richard Gregory
REP1-284	Richard John Callis
REP1-285	Richard Thomas Wyldes
REP1-286	Rosina Thornton
REP1-287	Ryan Harris
REP1-289	Sheila Mary English
REP1-290	Shelley Malton



Examination Library Reference	Written Representations Received from
REP1-294	Susan Harding
REP1-295	Sylvia Tilaks
REP1-297	Tim Maher
REP1-300	William Thomas Green
REP1-301	Keith Burrell



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

### 2.1 West Northamptonshire Council

Table 2.1: [REP1-173](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WNC-001	Glint and Glare	Local Roads	<p>Issue Specific Hearing 1 (ISH1) Environmental Matters.</p> <p>Action Point No. 8 - To provide a list of local roads that the Council's consider relevant for a Glint and Glare Assessment.</p> <p>WNC consider the below 3 roads should be included in the scope for assessment due to the proximity of the solar panels to the public highway. All 3 roads are subject to the national speed limit. Newland Road, Walgrave is a Quiet Lane with an advisory 20mph speed limit. Whilst traffic volume on this road will be low, its status as a Quiet Lane means the carriageway is shared with pedestrians, cyclists and equestrians introducing additional risk in the event that driver vision is impaired, even momentarily.</p> <p>Green Hill A – Broughton Road, Old</p> <p>Green Hill A – Newland Road, Walgrave (Quiet Lane)</p> <p>Green Hill A.2 – Kettering Road, Walgrave</p> <p>Please refer to the submission for the map extracts.</p>	<p>The Applicant has prepared a <b>Glint and Glare Technical Note [EX2/GH8.2.3]</b> which assesses the local roads requested by West Northamptonshire.</p>



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

#### 3.1 National Grid Electricity Transmission Plc

**Table 3.1:** [REP1-180](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-001	General Matters	Overall	<p>This written representation is made on behalf of National Highways ("NH") in respect of an application by Green Hill Solar Farm Limited ("Applicant") for an order granting development consent for the Green Hill Solar Farm Project ("DCO"). The Applicant seeks development consent for proposed authorised development described in Schedule 1 of the draft DCO ("Authorised Development").</p> <p>SUMMARY OF NH'S WRITTEN REPRESENTATION AND STEPS REQUIRED TO ENABLE NH TO REMOVE ITS OBJECTION</p> <p>NH (being the statutory successor to the Highways Agency) is an arms-length government owned company responsible for the ownership, management and improvement of England's motorways and major A-roads, collectively referred to as the strategic road network ("SRN"). NH is appointed pursuant to section 1 of the Infrastructure Act 2015 to act as the highway authority, traffic authority and street authority for the SRN. The effect of this appointment is to make NH the statutory custodian of this</p>	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			national asset, conferring on it the status and legislative functions of a strategic highways company. As a strategic highways company, NH must comply with a number of general and specific statutory duties <sup>1</sup> . NH has no desire to stymie development or to impose requirements on the Applicant which are disproportionate to the potential harm that could be caused to the SRN. NH is legally obliged to co-operate with third parties exercising planning or highway functions, which includes the Applicant in this statutory process. <sup>2</sup> NH is prepared to engage fully and assist in whatever way is reasonable to ensure that the Authorised Development proceeds as quickly and efficiently as possible.	
NH-002	Transport and Access	Trip generation	NH currently objects to the DCO and the Authorised Development for the reasons set out below: (a) (b) NH has reviewed Chapter 13 – Transport and Access of the Environmental Statement, including the associated Transport Assessment. The construction phase is expected to generate the highest level of traffic associated with the development. NH is satisfied with the trip generation methodology, but the Applicant has not come back on NH's questions on Forecast Trips and Trip Distribution. Therefore, NH has been unable to fully	This information was provided to National Highways on 11 November 2025. National Highways has confirmed that this is under review and further responses will be provided.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			assess the impact on construction traffic generation and routing on the SRN.	
NH-003	Development Consent Order	Strategic Road Network	<p>NH requires additional information regarding the proposed works no 5A and 8A outlined in Schedule 1 to the draft order in relation to their impact on the strategic road network (SRN). The nature and scope of the proposed works effecting the SRN is currently unclear. Without the appropriate level of information, it is not possible to effectively assess or manage the potential impact on the SRN.</p> <p>In order to remove its objection, NH require details of the cable crossing marked HV_SP8562_002 on the Crossing Schedule (GH7.18) as part of the Examination including: the cable alignment, duct diameter, capacity (whether more than 1 cable is to be provided for future capacity increased or redundancy/ contingency), confirmation on all parts of our SRN or land NH have an interest in that will be impacted by the proposed work. Notwithstanding NH's Relevant Representation this information remains outstanding.</p> <p>In respect of Work No 8A, NH understand there is no direct access proposed from the SRN; however, the works to facilitate those access works at works no 8a will impact the SRN at specific locations due to a need to introduce temporary traffic management on</p>	<p>As is typical for major planning applications and applications for development consent, the proposals for the Scheme are for an outline permission with the detailed design, subject to approval via the Requirements, to follow after the grant of consent. This approach is entirely typical of major infrastructure projects, including those promoted by National Highways (NH). It is well understood that a DCO will provide the broad powers and authorisations required to construct, operate, maintain and decommission the authorised development, with those powers being controlled by the Requirements and approved management plans (which must be substantially in accordance with the outline management plans). Where the authorised development interacts with statutory undertakers' assets, those statutory undertakers benefit from Protective Provisions which provide specific controls on the DCO powers that are relevant to</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>the SRN. National Highways requires additional information from the applicant as part of the Examination to confirm the scope and impact of the proposed works in this area. This includes any planned physical changes to the network, general arrangements, all traffic management layouts/arrangement, and road space booking proposals. Notwithstanding NH's Relevant Representation this information remains outstanding.</p>	<p>that statutory undertaker and their assets.</p> <p>The detail requested by NH as to the cable alignment, duct diameter, and cable capacity has not yet been determined as this forms part of the detailed design of the Scheme. The outline proposal for which development consent is sought is to lay the grid connection cable (Work No. 5A) in the area shown on the Works Plan subject to the relevant provisions in the <b>CDPP Revision A [REP1-151]</b>. The Cable Route Corridor provides a flexible width within which the cable may be sited, allowing for detailed design development and survey results to inform the micro-siting of the cable within the Corridor. Similarly, the DCO would provide an outline consent for Work No. 8A, being temporary works to the highway, including provision of accesses, with the design of the required road works and traffic management requirements to follow post-consent, as the detailed design of the Scheme is progressed.</p> <p>The purpose of the Protective Provisions, included at Part 6 of</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Schedule 15 of the <b>Draft DCO Revision A [REP1-008]</b> is to provide a framework for the Applicant to obtain, from NH, consent to any works that may affect the SRN. This framework includes for the provision of this detailed design information to be submitted to and approved by NH prior to commencing any works, ensuring there is no detriment to NH as a result of the fact that this level of detail cannot be provided at this time.
NH-004	Development Consent Order	Book of Reference	The book of reference as submitted by the Applicant identifies 15 plots of land owned or occupied by NH for the purposes of its undertaking ("Plots") in respect of which compulsory acquisition powers are sought. The compulsory acquisition powers sought are described in the book of reference as Acquisition of Rights and Imposition of Restrictive Covenants and temporary possession ("Compulsory Powers"). Article 24, 27, 30, 31 and 32 include powers of compulsory possession or interference with existing rights or interests. To safeguard NH's interests and the safety and integrity of the Strategic Road Network ("SRN"), NH objects to the inclusion of the following Plots in the	<p>The Applicant refers NH to the <b>Statement of Reasons [APP-019]</b> which sets out the compelling case in the public interest for the inclusion of compulsory acquisition and temporary possession powers within the <b>Draft DCO Revision A [REP1-008]</b>. The Statement of Need also sets out the urgent need for the Scheme.</p> <p>Section 127 of the Planning Act 2008 (PA08) confirms that compulsory acquisition powers may be included over statutory undertaker land where the Secretary of State is satisfied that:</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>DCO and to Compulsory Powers being granted in respect of them:</p> <p>Temporary possession powers: 11-112, 11-114, 12-127, 12-134, 12-135, 12-149 and 12-150;</p> <p>Acquisition of Rights and Restrictive Covenants: 12-127 and 12-128.</p> <p>The Plots constitute land acquired by NH for the purpose of maintaining its statutory undertaking and, accordingly, this representation is made under section 56 and sections 127 and 138 of the Planning Act 2008. NH considers that there is no compelling case in the public interest for the Compulsory Powers over these Plots.</p>	<p>(a) the land or right can be purchased and not replaced without serious detriment to the carrying on of the undertaking; or</p> <p>(b) if purchased, the land can be replaced by other land belonging to or available for acquisition by the undertaker without serious detriment to the carrying on of the undertaking.</p> <p>Section 138 of the PA08 confirms that the Order may include provision for the extinguishment of statutory undertaker rights or removal of apparatus where the Secretary of State is satisfied that this is necessary for the purposes of carrying out the authorised development.</p> <p>The Applicant notes that NH has not indicated that it considers that the inclusion of the power to compulsorily acquire rights in NH's land would cause any serious detriment to its statutory undertaking. The Applicant considers that the inclusion of protective provisions for the benefit of NH within the <b>Draft DCO Revision A [REP1-008]</b> ensures</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				that no serious detriment would be caused NH's undertaking from the inclusion of compulsory acquisition powers within the DCO as NH's consent is required prior to exercising such powers in respect of the SRN.
NH-005	Development Consent Order	Protective Provisions	<p>The DCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions. In addition to article 24, 31 and 32 referenced above, these include articles 8, 10, 12, 14, 16, 17, and 20. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. By way of further explanation:</p> <p>(i) Article 8 gives the Applicant the power to break open the streets, place and keep apparatus in or under the street etc to those streets referred to at Schedule 4. Schedule 4 includes the A45 which forms part of the strategic network that NH is responsible for at the following locations marked on the Streets Plan (APP-010):</p> <ul style="list-style-type: none"><li>• Points 11c and 11d</li></ul>	<p>The Applicant refers NH to the <b>Explanatory Memorandum Revision A [REP1-010]</b>, which provides a detailed explanation of each provision of the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>As noted in response to NH-003, it is typical for a development consent order to grant broad powers which are then controlled and managed by the Requirements and the Protective Provisions. The protective provisions at Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> (and shared with NH on 4 November 2025) provide a framework requiring NH approval for works to or affecting the strategic road network.</p> <p>In respect of article 8 specifically, this provides a statutory right for the purposes of s48(3) and s51(1) of the New Roads and Street Works</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>• Points 12o and 12n</li><li>• Points 12i and 12m</li><li>• Points 12e and 12f</li><li>• Points 12g and 12h</li></ul> <p>NH understand that there is no intention to break open the street or place apparatus between Points 11c and 11d, Points 12o and 12n and Points 12i and 12m and so these should be removed from Schedule 4. Despite highlighting this in NH's Relevant Representation, the nature and scope of the proposed works between Points 12e and 12f and Points 12g and 12h remains unclear. NH's protective provisions need to govern arrangements for works on this part of the highway.</p>	<p>Act 1991 (NRSWA), which relate to the placing of apparatus and the inspection and maintenance etc of such apparatus in streets. This statutory right is provided specifically in respect of the authorised development. It is required in order to lay cables within the highway, including where this is carried out by trenchless methods such as hydraulic directional drilling (HDD) which do not require the breaking of the road surface. The Applicant does not agree that the points identified should be removed from the Schedules to the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>The Applicant notes that this provision is widely precedented, and that the statutory right provided is subject to the provisions of sections 54 to 106 of NRSWA which deal with notice requirements, restrictions on works, safety measures, inspections, liability and information sharing. The statutory right is therefore no different to, for example, the statutory right to carry out street works granted by Schedule 4 to the Electricity Act 1989 to licence holders. Any street</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				works would be carried out in accordance with the standard procedure provided for by NRSWA, and supplemented by the additional protections for NH in Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> which include obtaining NH's consent prior to undertaking any works.
NH-006	Development Consent Order	Protective Provisions	<p>Article 10 gives the Applicant has the power to temporarily alter the layout and carry out works to the streets specified in column 2 of the table in Part 2 of Schedule 5 which includes the A45. The works listed in Part 2, Schedule 5 include the following points on the Streets Plan (APP-010):</p> <ul style="list-style-type: none"><li>• Points 11c and 11d</li><li>• Points 12i and 12m</li><li>• Points 12n and 12o</li></ul> <p>NH understand that no works of alteration are proposed between these points, only traffic management. The points should, therefore, be deleted from Part 2 in Schedule 5. It is otherwise noted the dDCO provides that the Applicant must obtain NH's prior approval for works undertaken under this article in connection with the SRN at paragraph 60 of NH's protective provisions of the applicant's draft DCO. However, such consent should not</p>	<p>The Applicant does not agree that the points identified should be removed from the Schedules to the <b>Draft DCO Revision A [REP1-008]</b>. As noted above, the <b>Draft DCO Revision A [REP1-008]</b> provides broad powers in order to provide the necessary flexibility to carry out the authorised development and respond to the development of the detailed design of the Scheme. These powers are then controlled by the Requirements and protective provisions. Protective provisions for NH are included in Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b>, and provide a framework for NH to consent to any works to or affecting its assets. Paragraph 58(3) provides that the Applicant must not, save in an emergency, exercise the powers</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			be subject to deemed consent under article 47 (see below).	in article 10 in relation to the SRN or NH's land without consent.
NH-007	Development Consent Order	Protective Provisions	<p>Article 12 provides the Applicant with powers equivalent to a temporary traffic regulation order in connection with any road. It is noted that consent is required from the street authority before exercising those powers. However, such consent should not be subject to deemed consent under article 47. In addition, at sub paragraph 3 of Article 12, the Applicant has the power to temporarily close, prohibit the use of, restrict the use of, alter or divert those streets specified in column 2 of the table at schedule 6. The A45, forms part of the SRN referred to at schedule 6. NH requires further information regarding the proposed works listed in Part 1 schedule 6, 'Streets to be Temporarily Closed,' as the nature and scope remains unclear, specifically for the following locations on the streets plan (APP-010):</p> <ul style="list-style-type: none"> <li>• 24m section of Nene Valley Way (A45) between points 11c and 11d</li> <li>• 19m section of Nene Valley Way (A45) between points 12l and 12m</li> <li>• 20m section of Nene Valley Way (A45) between points 12o and 12n</li> </ul> <p>The Applicant is required to consult with NH in this regard but does not require NH's consent.</p>	<p>The Applicant does not agree that the points identified should be removed from the Schedules to the <b>Draft DCO Revision A [REP1-008]</b>. As noted above, the <b>Draft DCO Revision A [REP1-008]</b> provides broad powers in order to provide the necessary flexibility to carry out the authorised development and respond to the development of the detailed design of the Scheme. These powers are then controlled by the Requirements and protective provisions. Protective provisions for National Highways are included in Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> and provide a framework for NH to consent to any works to or affecting its assets. Paragraph 58(3) provides that the Applicant must not, save in an emergency, exercise the powers in article 12 in relation to the SRN or NH's land without consent.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The Applicant should be required to obtain NH's consent in the event the activities effect the SRN or any land NH has an interest in line with paragraph 59(3) of the Protective Provisions annexed at Appendix 1. Such consent should not be subject to deemed consent under article 47 (see below).	
NH-008	Development Consent Order	Protective Provisions	Article 14 provides the Applicant with powers to carry out works to form and lay out such means of access or to improve existing means of access at any location within the order limits. National Highways network, forms part of that order limit. The Applicant should be required to obtain NH's consent in the event access is required to the SRN in accordance with paragraph 59(3) of the Protective Provisions annexed at Appendix 1. Such consent should not be subject to deemed consent under article 47 (see below).	<p>It is not anticipated that any works to form and lay out a means of access will be required on any of NH's land or affecting the SRN. Any such works would be "road works" as defined in Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> and would be subject to the approvals process set out therein.</p> <p>It is noted that paragraph 58(8) provides that article 47 does not apply to any application for consent, agreement or approval required or contemplated by the provisions of Part 6.</p>
NH-009	Development Consent Order	Protective Provisions	Article 16 provides the Applicant with powers equivalent to a temporary traffic regulation order in connection with any road. Consent is required from the traffic authority before exercising those powers however such consent should not be subject to deemed consent under article 47. In addition, at sub	As noted above, as is typical for projects requiring development consent, detailed design information is not available at this time. Any temporary traffic measures would be "road works" as defined in Part 6 of Schedule 15 to the <b>Draft DCO</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>paragraph 2 the Applicant has the power to temporarily place traffic signs and signals on those roads specified in column 2 of the table at schedule 8. NH requires further information regarding the proposed works listed in the schedule at the following points on the Streets Plan (APP- 010) as the nature and scope and duration of the proposed works remains unclear:</p> <p>11c and 11d, 12e and 12f, 12g and 12h, 12n and 12o and 12i and 12m.</p> <p>The dDCO allows the Applicant to exercise their powers at article 16(2) without the consent of NH and provides the applicant with deemed approval under section 65 1984 Act. NH must have control over the placing of signage on its network. The Applicant should be required to obtain NH's consent for any signage on the SRN secured through paragraph 59(3) of the Protective Provisions annexed at Appendix 1.</p>	<p><b>Revision A [REP1-008]</b> and would be subject to the approvals process set out therein.</p> <p>Paragraph 58(3) provides that the Applicant must not, save in an emergency, exercise the powers in article 16 in relation to the SRN or NH's land without consent. It is also noted that paragraph 58(8) provides that article 47 does not apply to any application for consent, agreement or approval required or contemplated by the provisions of Part 6.</p>
NH-010	Development Consent Order	Protective Provisions	<p>Article 17 this article allows the applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development. NH is concerned this provision potentially allows the applicant to make use of highway drainage infrastructure. This is not acceptable to NH, and the provisions of this article should exclude highway drainage.</p>	<p>It is not anticipated that any works to connect to NH's highway drainage infrastructure will be required for the Scheme. Should this change, any such works would be "road works" as defined in Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> and would be subject to the approvals process</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Article 20 this article allows the Applicant to enter any land within the order limits effected by the authorised development or enter on any land upon which entry is required in order to carry out monitor or survey in respect of the authorised development and , carry out surveys or investigations, trial holes, bore holes, ecological or archaeological investigations and place leave or remove apparatus on land in this regard. NH must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event of any access or works under this article affecting the SRN or any land National Highways has an interest in. This should be secured through paragraph 59(3) of the Protective Provisions annexed at Appendix 1.	<p>set out therein. Similarly, surveys carried out pursuant to article 20 also fall within the definition of “road works” and be subject to the same approvals process.</p> <p>It is noted that paragraph 58(8) provides that article 47 does not apply to any application for consent, agreement or approval required or contemplated by the provisions of Part 6.</p>
NH-011	Development Consent Order	Protective Provisions	<p>In terms of article 47 which provides for deemed approval where NH does not provide its consent or approval to any provisions under the order within 6 weeks of it being requested where no response is received.</p> <p>(A) 6 weeks is not considered a reasonable period of time to consider every application that may come through under this DCO, some may be</p>	<p>As noted above, paragraph 58(8) of Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> provides that article 47 does not apply to any application for consent, agreement or approval required or contemplated by the provisions of that Part.</p> <p>Any application to NH for consent or agreement will be managed entirely</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>more involved than others. 8 weeks would be considered reasonable.</p> <p>(B) In any event, NH is concerned with the deemed consent given the safety implications of works being carried out to or under the strategic road network that may have bypassed its approval processes. This is a fundamental issue of public safety that should not be compromised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision</p> <p>(C) Inclusion of paragraph 59(8) of NH's proposed protective provisions at appendix 1 would address NH's concerns which would seek to disapply article 47 in the context of any consent relating to the strategic road network. The effect of this is to prevent the Promoter from exercising powers over the SRN or land in which NH has an interest without deemed consent applying. The justification is to ensure</p>	by the protective provisions in Part 6.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			open dialogue between the parties so that NH has control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. As a public body, NH is under a duty to act reasonably, and this is expressly provided for in paragraph 59(5) of NH's protective provisions at Appendix 1.	
NH-012	Development Consent Order	Protective Provisions	<p>There are a number of Requirements included in Schedule 2 of the dDCO which NH has an interest and would expect to be consulted namely Requirements 3, 7, 8, 10, 11, 12, 13, 14, 15, 16 and 21. Reference to consultation with NH is required to be added to these Requirements.</p> <p>The protective provisions currently included in the dDCO are not agreed by NH. Inclusion of NH's protective provisions in a form acceptable to NH (as set out in Appendix 1) are required to ensure the necessary information is provided at the relevant stages and that NH's consent is obtained wherever access or works are to take place over any part of the SRN or land in which NH has an interest.</p>	<p>The Applicant does not consider it appropriate for NH to be a mandatory consultee on the Requirements listed. NH will be consulted in relation to the detailed construction traffic management plan where they are the relevant highway authority, under Requirement 15. The Applicant has also updated the <b>OCTMP Revision A [REP1-145]</b> to require consultation with NH in the event a closure or restriction of public rights of way near to the strategic road network are contemplated. The Applicant agrees that protective provisions are the appropriate mechanism to manage the interaction of the Scheme with NH' assets.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-013	Development Consent Order	Protective Provisions	<p>In NH's Relevant Representation, NH's role as an arms-length government owned company responsible for the ownership, management and improvement of England's motorways and major A-roads, collectively referred to as the SRN; the general and specific statutory duties NH has to comply with, and the directions contained within the 2015 Licence were explained at length in the Relevant Representation. It was also noted that the directions contained in the 2015 Licence are mandatory and are regulated by the Office of Road and Rail.</p> <p>It was also explained that:</p> <ul style="list-style-type: none"><li>(a) Sections 41 and 130 of the Highways Act 1980 contain respectively a statutory duty for NH to ensure it maintains the SRN to the appropriate/sufficient standard, free from any hazards so it is safe to use, and a statutory duty to assert and protect the rights of the public in use and enjoyment of the SRN.</li><li>(b) Section 16 of the Traffic Management Act 2004 contains a statutory Network Management Duty for NH to manage the SRN with a view to achieving, so far as may be reasonably practicable having regard to NH's other obligations, policies and objectives,</li></ul>	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>securing the expeditious movement of traffic on the SRN and facilitating the same on roads where another authority is the traffic authority.</p> <p>(c) Section 17 of the Traffic Management Act 2004 requires that NH shall make such arrangements as they consider appropriate for planning and carrying out the action to be taken in performing its Network Management Duty and has to establish processes to, as far as reasonably practicable, identify things (including future occurrences) which are causing, or have potential to cause SRN congestion or other disruption to the movement of traffic on it and consider any possible action that could be taken in response to (or anticipation of) anything so identified.</p> <p>(d) Under section 5(2)(b) of the Infrastructure Act 2015, NH is under a duty to have regard to the safety of highway users. Safety is at the heart of NH's function as a statutory undertaker – the safety of the travelling public, the safety of NH staff and the safety of third-party contractors on the network.</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-014	Development Consent Order	Protective Provisions	<p>This range of duties demonstrates that NH must always protect road users/the SRN and ensure the SRN retains its integrity, is free from hazard/safe to use and is available for continual uncongested use all year round subject to precise terms of its Network Management Duty which means NH is duty bound to consider carefully any activity that has the potential to impact on any of NH's statutory duties.</p> <p>As a minimum, therefore, where there is the potential for impact to the SRN the following needs to be secured:</p> <ul style="list-style-type: none"><li>(a) that NH be held harmless from the impact of third party development;</li><li>(b) that NH procedures put in place for the protection of property and persons are adhered to in accordance with NH's strict requirements on network occupancy;</li><li>(c) that any works carried out to the highway, on NH land, underneath the highway, above the highway and to apparatus forming part of the highway estate should be certified by NH and approved by NH on completion of the works;</li><li>(d) that financial provision should be put in place to ensure that in the event of the</li></ul>	<p>The comment is noted. Protective provisions for NH have been included at Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> and continue to be discussed.</p>



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



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-015	Development Consent Order	Protective Provisions	<p>NH considers that without the NH protective provisions, there is a considerable risk of serious detriment to the SRN, as any damage or injury to the SRN or wider highway estate would require funding to rectify that is not within NH's budget. There is no recourse to public funding for emergency works of this nature and a reserve of funding is not available. Without prejudice to whether the Authorised Development would cause a serious detriment to the SRN, it remains the case that the public purse should not be left to meet or subsidise costs of impacts caused by third party development to the SRN.</p> <p>Further, NH's estate comprises more than just the corpus of the highway (the 'top two spits'). Unlike local roads, where the local highway authority typically controls only the highway strata and sufficient vertical limits above and beneath the highway to maintain necessary apparatus and street furniture, in most cases NH controls the freehold of the land beneath the highway to the centre of the earth and to the heavens above. This estate is held for the benefit of the statutory undertaking, to ensure that the SRN is not compromised and that maintenance or improvement works at any required depth can take place free from risk of trespass or ransom.</p>	<p>The Applicant recognises that serious detriment to NH's undertaking could occur if protective provisions were not included in the DCO. For this reason, protective provisions for the benefit of NG have been included at Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-016	Development Consent Order	Works Plan	<p>The authorised development is situated between the towns of Northampton and Wellingborough and shares boundaries with the A43, A45, A509 and A428, of which the A45 is part of the Strategic Road Network. We also note that Cable Corridor 2 (CC2), which connects Green Hill E and Green Hill BESS (as referred to within the transport assessment (APP-151) runs adjacent to and under the A45. The Authorised Development includes Works no 5a and 8a in the DCO which will interface with the A45 Trunk Road and is therefore of interest to NH:</p> <p>Works No 5a</p> <p>We welcome continued engagement from the Applicant to understand how the cable route will interact with National Highways' assets. In order to remove its objection, National Highways require details of the cable crossing marked HV_SP8562_002 on the Crossing Schedule (GH7.18) including: the cable alignment, duct diameter, capacity (whether more than 1 cable is to be provided for future capacity increased or redundancy/ contingency), confirmation on all parts of our SRN or land NH have an interest in that will be impacted by the proposed work. The soil management plan and construction traffic management plan appear to have too high</p>	<p>Please refer to the Applicant's response to NH-003, above. The requirement that the cable works comply with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk) is found in paragraph 58(2)(c) of Part 6 to Schedule 15 of the <b>Draft DCO Revision A [REP1-008]</b>.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>level information for us to understand how our SRN would be impacted.</p> <p>The details set out at paragraph 4.2 need to be agreed with National Highways in order for NH to remove its objection to the scheme.</p> <p>Any proposed directional drilling under our network will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). We advise the applicant to review the requirements of CD622, which can be found on the Standards for Highways website. NH will also need to approve the design information in relation to works No 5a to ensure NH's assets will not be compromised by the authorised works. National Highways protective provisions secure this approval and NH's requirements.</p>	
NH-017	Transport and Access	Detailed Design Protective Provisions	<p>We understand there is no direct access proposed from the SRN; however, the works to facilitate those access works at works no 8a will impact the SRN at specific locations due to a need to introduce temporary traffic management on the SRN. This includes access CR15 marked on the Access to Works Plan (APP-012), located south of the A45 on Grendon Road, and access points CR12 and CR13, also referenced on the Access to Works Plan (APP-012), located off the A45 eastbound slip road at B573 Earls Barton</p>	<p>Please refer to the Applicant's response to NH-003, above. The detailed design information required to be provided to NH for any road works include, at (a)(vii) traffic signs and road markings, at (viii) traffic signal equipment and associated signal phasing and timing detail, and at (xv) any proposed departures from DMRB standards. Paragraph 58 of Part 6 of Schedule 15 to the <b>Draft DCO Revision A</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Road. These relate to the access for the construction compound CC2 as described in the transport assessment. (APP-151).</p> <p>National Highways requires additional information from the applicant to confirm the scope and impact of the proposed works in this area. This includes any planned physical changes to the network, general arrangements, all traffic management layouts/arrangement, and road space booking proposals.</p> <p>All works effecting the SRN must be carried out in accordance with permanent design standards and designed to full compliant standard with Design Manual for Roads and Bridges, Manual of Contract Documents for Highway Works and Traffic Signs Regulations and General Directions to ensure the safety and integrity of the SRN. This needs to be reviewed and agreed with National Highways. The requirements for this information are set out within National Highways protective provisions.</p>	<p><b>[REP1-008]</b> requires the Applicant to obtain National Highways' prior approval for road works, including the detailed design information.</p>
NH-018	Development Consent Order	Compulsory Acquisition	<p>The Applicant's draft DCO includes powers of temporary possession and the acquisition of rights in respect of the land interests owned by NH as set out in the table below referred to in the book of reference.</p> <p>It is noted there are no proposals to permanently acquire the freehold interest of</p>	<p>Please refer to the Applicant's response to NH-003, above. Paragraph 58(3) provides that the Applicant must not, save in an emergency, exercise the powers in article 31 or 32 (which relate to temporary possession) in relation to</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>NH land. The proposal is to acquire rights over some of NH's plots. It is unclear whether the new rights can co-exist with the NH interests in the plots or whether NH's interests will be extinguished. NH require further understanding of how the acquired rights proposed by the Applicant will co-exist with NH interests. If NH interests can co-exist with the rights proposed by the Applicant, NH can withdraw its concern in this regard however if NH interests are to be extinguished by the order NH would maintain its objection.</p> <p>The Applicant is seeking to temporarily possess some plots of land that NH own the freehold interest to. The A45 crosses these plots. NH seeks clarity from the Applicant on the reasons temporary possession of this land is sought when article 10 of the DCO would provide the Applicant with the powers to carry out the highway works.</p> <p>The title of some of the plots of land in the table below (where this paragraph is referred to) are listed on the Land Registry in the name of National Highways Ltd. These plots are subsoil to parts of the highway network. The highway has been de-trunked pursuant to an order under section 10 of the Highways Act 1980 and is no longer part of the Strategic Road Network<sup>5</sup>. By virtue of Section 265 of the Highways Act 1980, the de-trunking order has transferred ownership of the operational</p>	<p>the SRN or NH's land without consent. Paragraph 72(3) of Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> provides that the Applicant must acquire or use land, acquire new or existing rights, impose or extinguish restrictive covenants, extinguish rights held by NH or interfere with apparatus of NH, unless NH has consented to this.</p> <p>The Applicant recognises that the ownership, maintenance and responsibility for the operation of local roads (primarily the detrunked A43) rests with the local highway authority. However, as the administrative process to transfer title in the land to the local authority has not been completed, NH continues to be legal owner pursuant to the titles registered with the land registry. To ensure complete accuracy of the <b>Book of Reference Revision A [REP1-012]</b>, both the effective interest of the local highway authority, and the legacy but persisting interests of NH in the registered titles, is recorded.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			highway including the subsoil, to the Local Highway Authority (LHA). This means that ownership of these plots is vested in the LHA. The transfer of the registered proprietorship is an administrative exercise that is yet to be undertaken. Ownership, maintenance, and responsibility for the operation of these roads and land transferred to the LHA and the LHA should be consulted in relation to the possession of these plots. The book of reference should be updated at the next iteration to reflect the legal ownership.	
NH-019	Development Consent Order	Protective Provisions	Whilst the protective provisions included in the Applicant's draft DCO for NH's benefit, include some protections for NH, concerns do remain in relation to the form of those protective provisions and some of the articles. The form of protective provisions included at Appendix 1 of NH's Relevant Representation would address some of those concerns as explain further below. By way of further explanation, the dDCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions. As the highway authority NH must have control over the operations being carried out on and under its network in order to comply with its duty to	As set out above, the Applicant is confident that the protective provisions in Part 6 of Schedule 15 to the <b>Draft DCO Revision A [REP1-008]</b> provide appropriate protection for NH's statutory undertaking. The concern of NH that the exercise of the DCO powers could cause a safety issue is wholly unfounded, for the reasons set out in detail above.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			co-ordinate the execution of works of all kinds (including works for road purposes) under section 59 of the New Roads and Street Act 1991. Road space booking will be required in connection with any works affecting the SRN so NH can comply with this duty. This is critical from a safety perspective and to protect the structure of the street and the integrity of apparatus in it. Therefore, the applicant should be required to obtain NH's consent in the event the activities effect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 59(5) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 59(3) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under the articles identified. Such consent should also not be subject to deemed consent under article 47 and paragraph 59(8) disapplies article 47 as explained in the table below. The following articles are of specific concern to NH:	
NH-020	Transport and Access	Draft DCO Requirements	NH should be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not adversely impact the SRN. This is in the	Please refer to the Applicant's response to NH-012, above



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>interest of maintaining the safe and efficient operation of the SRN.</p> <p>Inclusion of drafting in red would address NH's concern.</p> <p>Requirement 3 (1) The undertaker may submit any amendments to any approved document to the relevant planning authority for approval in consultation with National Highways and, following approval, the relevant approved document is to be taken to include the amendments approved under this paragraph</p>	
NH-021	Transport and Access	Draft DCO Requirements	<p>Requirement 7 (1) No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority in consultation with National Highways for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities in consultation with Natural England.</p> <p>NH should be given an opportunity to review the landscape and ecological management plan in the interest of the safe and efficient operation of the SRN and to protect the soft estate of the SRN from potential ecological or landscape-related impacts. Inclusion of drafting in red would address NH's concern.</p>	Please refer to the Applicant's response to NH-012, above



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-022	Transport and Access	Draft DCO Requirements	<p>Requirement 8 (1) No part of the authorised development may commence until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority in consultation with National Highways for that part or, where the phase falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities in consultation with Natural England.</p> <p>NH should be given an opportunity to review the ecological protection and mitigation strategy to ensure appropriate ecological safeguards are implemented and maintained, with consideration of potential impacts on the SRN. Inclusion of drafting in red would address NH's concern.</p>	Please refer to the Applicant's response to NH-012, above
NH-023	Transport and Access	Draft DCO Requirements	<p>Requirement 10 (1) No part of the authorised development may commence until written details of all proposed temporary fences, walls or other means of enclosure, including those set out in the construction environmental management plan, for that part have been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities.</p>	Please refer to the Applicant's response to NH-012, above



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>(2) No part of the authorised development may commence until written details of all permanent fences, walls or other means of enclosure for that part have been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities.</p> <p>NH should be given the opportunity to review the details of any proposed fences, walls or enclosures if within the vicinity of the SRN for reasons of safety, liability, and maintenance and to ensure compliance paragraph 57 of DfT Circular 01/2022 which sets out any structures “must be located outside of the highway boundary of the SRN. In general terms, structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot topple on to the SRN or undermine its geotechnical integrity”</p> <p>Inclusion of drafting in red would address NH's concern.</p>	
NH-024	Transport and Access	Draft DCO Requirements	Requirement 11 No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and	Please refer to the Applicant's response to NH-012, above





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>approved by the relevant planning authority in consultation with National Highways.</p> <p>NH should be given the opportunity to review the details of the surface water and foul water drainage system to ensure the integrity of the SRN drainage infrastructure is not interfered with and that any plans are in accordance with DfT Circular 01/2022. Please see NH comments at article 17 above. Particular attention must be given where the drainage is adjacent to the SRN or National Highways land, as changes in water management could directly affect the SRN asset. No surface water run-off from the development shall be discharged into the SRN drainage systems. No new drainage connections from third-party developments will be permitted Inclusion of drafting in red would address NH's concern.</p>	
NH-025	Transport and Access	Draft DCO Requirements	<p>Requirement 12 (2) No part of the authorised development may be commenced until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple planning authorities, each of the relevant planning authorities.</p> <p>NH should be given the opportunity to review the details of the archaeological assessment to ensure appropriate archaeological</p>	Please refer to the Applicant's response to NH-012, above



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			assessment and mitigation, so NH may share knowledge where its own development may have previously impacted unidentified assets Inclusion of drafting in red would address NH's concern.	
NH-026	Transport and Access	Draft DCO Requirements	<p>Requirement 13 No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities.</p> <p>NH should be given the opportunity to review the details of the construction environment management plan to ensure mitigation of environmental impacts during the construction phase and to ensure the SRN is not adversely affected by noise, dust, or other construction related issues. Inclusion of drafting in red would address NH's concern.</p>	Please refer to the Applicant's response to NH-012, above
NH-027	Transport and Access	Draft DCO Requirements	Requirement 14 (1) Prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part must be submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple	Please refer to the Applicant's response to NH-012, above



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			relevant planning authorities, each of the relevant planning authorities.  NH should be given the opportunity to review the details of the operational environment management plan to ensure the management of long-term environmental risks associated with the site and ensure ongoing protection of the SRN. Inclusion of drafting in red would address NH's concern.	
NH-028	Transport and Access	Draft DCO Requirements	Requirement 15 (1) No part of the authorised development may commence until a construction traffic management plan for that part must be submitted to and approved by the relevant planning authority in consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities.  NH should be given the opportunity to review the details of the construction management plan to manage the construction traffic and vehicle movements safely and efficiently, minimising disruption and potential hazards to the SRN. Inclusion of drafting in red would address NH's concern.	Please refer to the Applicant's response to NH-012, above
NH-029	Transport and Access	Draft DCO Requirements	Requirement 16 (1) Prior to the date of final commissioning of the authorised development, an operational traffic management plan must be submitted to and approved by the relevant planning authority in	Please refer to the Applicant's response to NH-012, above



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>consultation with National Highways or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities.</p> <p>NH should be given the opportunity to review the details of the operational traffic management plan to ensure that traffic generated during the operation of the development does not adversely affect the safety or capacity of the SRN. Inclusion of drafting in red would address NH's concern.</p>	
NH-030	Transport and Access	Draft DCO Requirements	<p>Requirement 21 (6) No decommissioning works must be carried out until the relevant planning authority has approved the decommissioning plan submitted in relation to those works, in consultation with the Environment Agency and National Highways.</p> <p>NH should be given the opportunity to review the details of the decommissioning plan. This should include a transport assessment and construction environmental impacts to ensure that the decommissioning process will not adversely affect the SRN. This is particularly important where restoration to previous site use is proposed. Inclusion of drafting in red would address NH's concern.</p>	Please refer to the Applicant's response to NH-012, above
NH-031	Transport and Access	Cumulative Peak traffic flows	The Authorised Development will also interface with the Strategic Road Network in the following way:	Please refer to the Applicants response to comment 'NH-053' in <b>The Applicant's Responses to</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>(a)Traffic and Transport – Construction Phase</p> <p>National Highways have reviewed Chapter 13 – Transport and Access of the Environmental Statement (APP-050), including the associated Transport Assessment provided by the Applicant. NH offers the following comments which have also been shared with the Applicant:</p> <p>The consultant has considered relevant development policies, including the National Planning Policy Framework and Strategic Road Network guidance, in the preparation of the Transport Assessment. However, NH note that 2029 has been used as the forecast year for cumulative impact assessment. NH requires clarification on this selection, as peak construction activity may occur earlier and some assumed highway improvements may not be in place at that time.</p> <p>NH note that the construction of the scheme is anticipated to commence in 2027 and be completed by 2029. The construction phase is expected to generate the highest level of traffic associated with the development.</p> <p>NH has asked the Applicant provide further clarification regarding the use and justification</p>	<p><b>Relevant Representations [REP1-161].</b></p> <p>The Applicant acknowledges that the trip generation methodology is agreed. The further information requested was provided to National Highways on 11 November 2025. National Highways has confirmed that this is under review and further responses will be provided.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			of proxy site data, the construction traffic generation, and trip distribution at key SRN junctions (A14 Junction 2 (A14 – A508 Junction), A14 Junction 8 (A14 – A43 Junction), A14 Junction 9 (A14 – A509 Junction), A45 Junction 14 (A45 – A509 Junction), A45 Junction 10 (A45 – B573 – Station Road Junction) and A45 Barnes Meadow Interchange. NH is now satisfied with the trip generation methodology, but the Applicant has not come back on NH's questions on Forecast Trips and Trip Distribution. Therefore, National Highways have been unable to fully assess the impact on construction traffic generation and routing on the SRN.	
NH-032	Transport and Access	Operational Phase	Once operational, the scheme will generate minimal traffic, with fewer than one maintenance visit per day per site, typically undertaken by light vans or 4x4 vehicles set out in Chapter 13 – Transport and Access of the Environmental Statement (APP 050). This level of activity is not expected to result in any material impact on the SRN.	The Applicant notes this comment and agrees.
NH-033	Transport and Access	Decommissioning Phase	NH note from Chapter 13 – Transport and Access of the Environmental Statement (APP-050) that vehicle movements associated with the decommissioning phase are not expected to exceed those generated during the construction period.	The Applicant notes this comment and agrees.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-034	Transport and Access	Abnormal loads	<p>NH understands the project will require abnormal loads for specific equipment and materials (elements such as transformers) to the site on the SRN. NH encourages the Applicant to engage with NH early in the process to establish an effective movement strategy. Please note that a Special Orders will be required for loads exceeding 150 tonnes pursuant to section 44 of the Road Traffic Act 1988. This falls outside of the DCO process.</p> <p>The Applicant has contacted NH through their transport consultant, Wynns Ltd. A feasibility study has been completed assessing the suitability of the network for the proposed route of the abnormal load from the Port of Tilbury to the BESS site at Grendon for 183-tonne loads.</p> <p>The Applicant has been advised that feasibility studies are high-level assessments designed to determine whether the network is structurally capable, at this stage, of accommodating the proposed heavy loads. The applicant must submit a formal applications closer to the actual movement date once a haulier has been appointed. At that time, route suitability will be re-checked with all relevant structure and road owners, and a Special Order permit for the movement will be issued.</p>	<p>Noted and agreed.</p> <p>The <b>OCTMP Revision A [REP1-145]</b> sets out the Abnormal Load notification process that will be followed.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NH-035	Statement of Common Ground	Statement of Common Ground	To date, NH has not entered discussions with the Applicant on the Statement of Common Ground other than in relation to the structure, and no matters have been discussed or agreed concerning the Statement of Common Ground and a draft Statement of Common Ground is awaited.	The Applicant issued the latest draft SoCG to NH on 11 November 2025 and will continue to engage with NH to seek to reach agreement on all transport matters within the SoCG. The current draft is submitted at Deadline 2 <b>[EX2/GH8.3.7]</b> .
NH-036	Development consent Order	Protective Provisions	<p>The protective provisions currently in the draft DCO [APP-017] at Part 6 Schedule 15 are not agreed by NH. NH's template form was provided to the Applicant on 25th July 2025 and return comments were received on 9th September. That mark-up was quite substantive. This is due to the Applicant splitting out the works the subject of the protective provisions into road works – works which affect the surface of the Strategic Road Network and cable works – works which are to take place beneath the SRN in NH land via directional drilling. NH has no objection to that approach.</p> <p>In splitting the works there have, however, been a number of assumptions made by the Applicant around particular provisions not being applicable to the cable works which is not necessarily the case. By way of example the cable works will require a bond, road booking space and a provisional certificate. There have also been a number of amendments to NH's standard form Protective Provisions and the need for the amendment</p>	<p>The form of protective provisions in the <b>Draft DCO Revision A [REP1-008]</b> has been updated to reflect the latest version provided by the Applicant to NH. The Applicant awaits further comments from NH and is confident that protective provisions will be agreed by the end of Examination.</p> <p>The justifications provided by NH are noted. The Applicant considers that the form of protective provisions provided in <b>Draft DCO Revision A [REP1-008]</b> is consistent with those justifications.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>has not been justified or is unclear. There are also amendments NH will not agree to such as to the indemnity provisions. NH require a full indemnity which should be unconditional and unequivocal. National Highways must be held harmless from the impact of third-party development;</p> <p>An updated draft of the protective provisions has been received by the Applicant and NH will continue to discuss the protective provisions with the Applicant in an effort to reach agreement. An updated draft of the protective provisions which NH is prepared to accept and reflect the last draft of the protective provisions sent to the Applicant is included at Appendix 1 to this Written Representation.</p> <p>A full justification for each of the key provisions and definitions of National Highways protective provisions is set out below:</p>	



## 3.2 National Highways

**Table 3.2:** [REP1-182](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NE-001	General matters	Overall	<p>These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for Green Hill Solar Farm ('the Project') submitted by Green Hill ('the Applicant') to the Secretary of State.</p> <p>Natural England has already provided a summary of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on [14 August 2025]. This document comprises an updated detailed statement of Natural England's views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date. These are structured as follows:</p> <p>a. Section 2 describes the conservation designations, features and interests that may be affected by the Project and need to be considered.</p>	The Applicant notes this comment.
NE-002	Ecology and Biodiversity	Internationally Designated Site	<p>Internationally designated sites – GREEN</p> <p>The proposal is adjacent to Upper Nene Valley Gravel Pits Special Protection Area (SPA) and RAMSAR at its closest point. The</p>	The Applicant notes this comment and agrees with the statements therein.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Upper Nene Valley Gravel Pits SPA is designated for its Annex I species: Bittern, Golden plover, Gadwall and the wider waterbird assemblage. While the proposal would not result in the direct loss of Upper Nene Valley Gravel Pits SPA, it has the potential to result in the loss of land used by the qualifying features outside of the SPA boundary. Where land outside of the boundaries is frequently used by the qualifying features, this land supports the functionality and integrity of the SPA and will contribute to the achievement of the SPAs' conservation objectives and is therefore protected in this context. This land is described as 'functionally-linked land' (FLL).	
NE-003	Ecology and Biodiversity	Internationally Designated Site	<p>The HRA states that 67.49 hectares of functionally linked land would be impacted by the development. This conclusion is based on winter surveys carried out over 2 years. Natural England advised that surveys for functionally linked land should be two winter seasons of diurnal surveys (six visits per season) and two years of nocturnal surveys (three visits per season) at all sites within 10km of the site boundary. Natural England are satisfied that the applicant has a sufficient survey methodology and the data is enough to inform the HRA.</p> <p>Since the relevant representations, we have entered discussions with the application to</p>	<p>The Applicant acknowledges this response and is pleased that Natural England approve the Applicant's approach to FLL categorisation. However, it should be clarified for the record that all fields within the Order Limits were surveyed, as per the methodology set out within Environmental Statement <b>Appendix 9.9 Wintering Bird Surveys [APP-092]</b>. FLL was then categorised on a field basis, based on the empirical survey data demonstrating pattern use of particular fields. The land parcel scale was not used in determining FLL.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>discuss our previous advice. Through discussions with the applicant we now have a better understanding of their survey methodology. Instead of surveying the majority of fields within the red line boundary, they have surveyed a portion and used the survey findings as a representation of the bird population at a 'land parcel scale'. This has been approved by Natural England's Ornithology team.</p> <p>It is now Natural England's position that this is an appropriate approach to determine FLL, provided the relevant desk study information is also considered in the assessment.</p>	<p>This is clearly stated in the <b>HRA Revision A [REP1-153]; Paragraphs 7.2.32-7.2.33 (FLL Definition)</b> and was communicated in the meeting held between the Applicant's Ecologist and Natural England, referenced in the response.</p>
NE-004	Ecology and Biodiversity	Outline Ecological Protection and Mitigation Strategy	<p>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 for your appropriate assessment conclusion, further information is required on the location, the habitat creation/establishment, the timing/phasing of the habitats, management for the lifetime of the development, and the monitoring strategy for the proposed FLL mitigation. 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 disturbance during the months of November</p>	<p>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 <b>OLEMP Revision A [REP1-137]</b>. 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</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to February. Provided that this mitigation measure is adequately secured, this is appropriate. Other than that, no further detail is available. The mitigation measures must be managed and maintained for the lifetime of the development (and any associated potential negative impacts from the development proposal). We would recommend that a monitoring programme is in place to monitor both the establishment and monitoring of the prescribed habitats, as well as their functionality for birds. We would advise that any management and monitoring program is fully costed to ensure financial certainty of delivery. We welcome the opportunity to work with the applicant to review the proposed mitigation in more detail.	and Ecological Management Plan with further detail, including costing, will be prepared post-consent - this would be secured through Requirement 7 of the <b>Draft DCO Revision A [REP1-008]</b> .  Measures prescribed in the Outline Ecological Protection and Mitigation Strategy 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 <b>Draft DCO Revision A [REP1-008]</b> .
NE-005	Ecology and Biodiversity	Visual Noise	Visual and noise disturbance  Please note that we have made further representations regarding potential impacts from noise and visual disturbance in response to 9.0.8 ExQ1.	The Applicant has responded to this matter in <b>The Applicant's Response to Deadline 1 Submissions [EX2/GH8.1.15]</b> .
NE-006	Ecology and Biodiversity	Internationally Designated Sites	Natural England is satisfied that 'green' issues are unlikely to result in adverse effects on the integrity of the following internationally designated sites, subject always to the appropriate mitigation/compensation as being secured adequately. Environmental Statement Chapter 9 (May 2025) contains an assessment of impacts to ecology and	The Applicant has responded to this matter in <b>Applicant Responses to Relevant Representations [REP1-161]</b> (please refer to the Applicant's response to NE-006).



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			biodiversity, including on Nationally designated sites. There are a large number Sites of Special Scientific Interest within close (<5km) proximity of the development proposal. At relevant representations we stated 'For most of the SSSIs listed, the notified interest features have not been fully identified or set out. While all sites have been considered, a summary table which shows the notified interest features for each site, consideration of the relevant impact pathways and mitigation measures would be useful.' We have note seen an update. Natural England agree with the conclusion of the assessment of impacts to SSSIs.	
NE-007	Ecology and Biodiversity	Protected Species	At this stage, Natural England have not been engaged regarding the production of a Letter of No Impediment (LoNI) for protected Species Licences. Where this is required, submission of draft protected species licence applications would be required for review. Information relating to wildlife licencing and NSIPs is provided within the Planning Inspectorate's Advice Note 11, Annex C. Specifically, at the bottom of page 6 and within Appendix I. In the absence of draft protected species licences, Natural England are unable to determine whether a licence is likely to be granted. Aside from these comments, our advice at this stage is limited to our Standing Advice.	The Applicant has responded to this matter in <b>Applicant Responses to Relevant Representations [REP1-161]</b> (please refer to the Applicant's response to NE-007.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NE-008	Ecology and Biodiversity	Biodiversity Net Gain	Biodiversity Net Gain (BNG) is a demonstrable gain in biodiversity assets as a result of a development project that may or may not cause biodiversity loss, but where the final output is an overall net gain. The Environment Act has set out that BNG will be mandatory for the majority of new development from November 2023 and mandatory for NSIPs in 2025. Whilst BNG is not yet mandatory, it is considered best practice to deliver a measurable net gain through any new development. Natural England welcome the significant BNG proposals from the applicant in habitat, hedgerows and water courses.	The Applicant notes this comment and agrees with the statements therein.
NE-009	Landscape and Visual Impact	Nationally designated landscapes	The proposed development is not located within, or within the setting of any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of the development. The examining authority should have regard for the landscape character of the area. We welcome reference to Natural England's National Character Areas and other Local Landscape Character Assessments within ES Chapter 8. We would also like to stress the importance of assessing potential cumulative landscape impacts from the development.	<p>The Applicant notes this comment.</p> <p><b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> includes a thorough and robust Cumulative Assessment. In reaching the overall assessment of effects associated with the Scheme the cumulative effects of each of the Sites and Cable Route Corridor are assessed and combined to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme.</p> <p><b>Appendix 8.3 ES LVIA Assessment Sheets Revision A [REP1-041]</b> contains an Assessment of Cumulative Site Effects on the different Landscape</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Study Areas and Landscape Fabric with a detailed examination of effects set out within section 8.9 of the LVIA. Cumulative Site Visual Effects are addressed within section 8.9 of the LVIA with <b>Appendix 8.3 LVIA Assessment Sheets Revision A [REP1-041]</b> containing details on the individual Visual Assessments. This includes an assessment of both Combined views and Sequential views. A cumulative assessment of the Scheme and other Cumulative Developments is included within the LVIA, assessing both the cumulative landscape and visual effects of the Scheme in conjunction with other local developments. The Cumulative Developments assessment considers the additional effects resulting from the Scheme in combination with the effects resulting from other similar developments, these being other renewable projects taken together, further details can be found in <b>Appendix 8.3 LVIA Assessment Sheets Revision A [REP1-041]</b></p>
NE-010	Agriculture and Soils	ALC survey	Natural England welcome that a detailed ALC survey has been undertaken across the main site as seen in the Environmental Statement Chapter 20: Agricultural Circumstances [APP-057]. However, a detailed ALC survey	The Applicant notes this comment. As stated in <b>ES Chapter 20 Agricultural Circumstances [APP-057]</b> , a Soil Resource Survey will be undertaken post consent and precontraction along





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			is typically expected for the full application site, including the proposed cable route and any areas of permanent sealing. There are no changes or updates to our advice at relevant representations.	the construction working width of the Cable Route where soils and agricultural land will be disturbed. The soil data will be used to develop Detailed Soil Management Plan, which is based on <b>OSMP [APP-550]</b> .
NE-011	Arboriculture	Ancient and veteran trees	Natural England advise that impacts on ancient woodland and ancient and veteran trees should be considered in line with paragraph 193 of the NPPF. Natural England and the Forestry Commission have also produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees	The Applicant notes this comment. The NPPF section referred to is listed as 'relevant policy' in the <b>ES Chapter 19 Arboriculture [APP-056]</b> in paragraph 19.3.10. Natural England and the Forestry Commission's Standing Advice also formed part of the arboricultural assessment and is listed as relevant guidance in paragraph 19.3.19 of the aforementioned ES Chapter.



### 3.3 Natural England

**Table 3.3:** [REP1-177](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NGET-001	General matters	Overall	<p>This written representation is submitted on behalf of National Grid Electricity Transmission plc (NGET) in response to the application by Green Hill Solar Farm Limited (Promoter) for the Green Hill Solar Farm Order (Order) to enable the construction of the Green Hill Solar Farm (Green Hill Project).</p> <p>In summary of NGET's position, NGET considers that it has existing and future infrastructure that needs to be protected via the protective provisions that NGET is proposing be included in the final form of the Order. These protective provisions include wording that has precedent in other development consent orders that have been recently granted. Without inclusion of the protective provisions, serious detriment would be caused to NGET's undertaking as well as to other third-party projects that are reliant on NGET's existing and future infrastructure including the Green Hill Project itself.</p>	The Applicant notes this comment.
NGET-002	General matters	Overall	As set out in NGET's relevant representation dated 13 August 2025, NGET owns assets that form an essential part of the electricity transmission network in England and Wales either within, or in close proximity to, the	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Green Hill Project. These assets (NGET Assets) form an essential part of the electricity transmission network in England and Wales.</p> <p>The NGET Assets presently comprise the following: (a) Substation</p> <ul style="list-style-type: none"><li>(i) Grendon Substation; and</li><li>(ii) Associated overhead and underground apparatus including cables.</li></ul> <p>Overhead Lines (OHL) (shown in Figure 1)</p> <ul style="list-style-type: none"><li>(i) ZA 400kV OHL - Cottam - Grendon and Grendon-Staythorpe;</li><li>(ii) ZA 400kV OHL - Grendon – Sundon 2; and</li><li>(iii) Multiple section of minor lines of 33kV and below.</li></ul> <p>As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to the NGET Assets, and any other infrastructure and land which is within or in close proximity to the draft Order Limits.</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NGET-003	General matters	Overall	<p>Additionally, NGET is bringing forward a number of projects at this location (further details are set out at paragraphs 2.4-2.16 below). These projects comprise:</p> <ul style="list-style-type: none"><li>(a) reconductoring works to 4ZA route of existing overhead lines (OHL) at Grendon substation (Reconductoring Works) as part of the wider Weston Marsh to East Leicestershire Project (WMEL Project), being the construction of two new substations near Corby Glen and Wartnaby in Leicestershire and new overhead line between the new substations and the Weston Marsh substation; and</li><li>(b) reinforcement and upgrade of the conductor on the existing 400kV double circuit overhead line (A486 and A487) between towers ZA301 and ZA418A from Sundon to Grendon (known as the Sundon to Grendon Reconductoring Project) (SGRE Project);</li></ul> <p>together, the NGET Upgrade Projects.</p>	The Applicant notes this comment.
NGET-004	Cumulative	Weston Marsh to East Leicestershire Project	The WMEL Project has been designated as a priority among several network upgrades aimed at supporting the UK Government's strategic energy goals. Its primary objective is to strengthen the national electricity	Please refer to the Applicant's response to comment 'NGET-003' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> in regard to the WMEL project.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>transmission infrastructure and facilitate the integration of low-carbon energy sources into the National Grid. By enabling significant increases in north-to-south power transfer capacity, the project will assist in transporting electricity generated from renewable 10-106744580-3\340758-292 sources, particularly offshore wind, to regions with substantial consumer demand throughout the UK. 2.6 2.7 2.8</p> <p>The WMEL Project will involve the following works:</p> <ul style="list-style-type: none"><li>(a) a new 400 kV transmission connection between the new Weston Marsh 400kV substation infrastructure and a new 400kV substation (WMEL-B) on the ZA 400kV line north of Market Harborough;</li><li>(b) routeing the proposed reinforcement via a new 400kV substation (WMEL-A) on the 4VK 400kV line north of Ryhall; and</li><li>(c) the Reconductoring Works.</li></ul> <p>The Order Limits for the Green Hill Project directly overlap with the Reconductoring Works. The interaction between the WMEL Project and the Green Hill Project is shown</p>	<p>The Applicant is discussing the form of protective provisions with NGET which will provide a mechanism for NGET to approve any works near or affecting NGET's assets, ensuring any conflict between the Scheme and NGET's WMEL Project is avoided.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>in Appendix 1 below. Appendix 1 presents an extract of the Reconductoring Works with the order limits of the Green Hill Project overlaid.</p> <p>NGET is concerned that there should be sufficient space to undertake the Reconductoring Works around Grendon Substation, particularly with regards to Towers ZA300D and ZA300C which are located in proximity to the proposed energy storage facility to the west of Grendon Substation proposed as part of the Green Hill Project. The preliminary red-line boundary for the Reconductoring Works around Grendon Substation are shown in Figure 2.</p>	
NGET-005	Cumulative	Sundon to Grendon Reconductoring Project	<p>The SGRE Project constitutes the reinforcement of the existing 400kV double circuit overhead line from Grendon to Sundon (A486 &amp; A487). The existing circuit currently operates at a rating of 2009MVA (Post fault) and is projected to face overload issues driven by new developments in North Northamptonshire, Milton Keynes, and Central Bedfordshire. This reinforcement aims to address these circuit overloads and increase the LE1 boundary thermal limitations.</p> <p>The SGRE Project was classified as 'Proceed – Critical' in the Beyond 2030</p>	<p>The Applicant is discussing the form of protective provisions with NGET which will provide a mechanism for NGET to approve any works near or affecting NGET's assets, ensuring any conflict between the Scheme and NGET's SGRE Project is avoided.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>report published by ESO (now NESO) and plays a vital role in achieving national objectives for net-zero by 2050 and decarbonising the power sector by 2035.</p> <p>2.10 2.11 The SGRE Project has been signalled as a critical project by NESO with the primary driver being to uplift the boundary capacity and relieve the thermal constraints on the circuits. The works will involve:</p> <ul style="list-style-type: none"><li>(a) replacing the conductor on the double circuit with a higher rated one;</li><li>(b) tower strengthening; and</li><li>(c) additional remedial works to existing infrastructure.</li></ul> <p>NGET is concerned that there should be sufficient space to undertake its works around Grendon Substation, particularly with regards to Tower ZA302 which is located within the area required for the proposed energy storage facility to the south of Grendon Substation proposed as part of the Green Hill Project.</p>	
NGET-006	Cumulative	Weston Marsh to East Leicestershire Project	The programme for the WMEL Project currently highlights reconductoring works running from 2030-2033 and there is a planned outage in 2029 to carry out the SGRE Project works. Works for the Green	This comment is noted. The Applicant is discussing the form of protective provisions with NGET which will provide a mechanism for NGET to approve any works near or affecting



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
		Sundon to Grendon Reconductoring Project	<p>Hill Project are scheduled from 2027-2029 with connection to the National Grid in 2029.</p> <p>There is therefore significant existing and future NGET infrastructure which is being brought forward within and in proximity to limits of the Order which will physically overlap with the Green Hill Project works and infrastructure and may overlap temporally subject to project programmes. There therefore needs to be a co-ordinated approach to the works to ensure that no project causes undue interference with the other.</p> <p>It should be noted in particular that the Green Hill Project is reliant on the Reconductoring Works in order to transport electricity via the National Grid.</p>	<p>NGET's assets, ensuring conflict between the Scheme and NGET's WMEL Project is avoided and a co-ordinated approach to works is taken.</p>
NGET-007	Cumulative	<p>Weston Marsh to East Leicestershire Project</p> <p>Sundon to Grendon Reconductoring Project</p>	<p>The NGET Upgrade Projects are critical infrastructure to enable the connection of multiple projects at this location, with the Green Hill Project being only one of a number of projects requiring a future connection at one of the Grendon substations.</p> <p>The third-party connector projects which are taking place in the vicinity of the substations at Grendon are currently subject to review. NGET are considering the extent to which any third party connector projects may be impacted by the Green Hill Project and the</p>	<p>Please refer to the Applicant's response to comment 'NGET-003' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> in relation to the WMEL project. The Applicant is discussing the form of protective provisions with NGET which will provide a mechanism for NGET to approve any works near or affecting NGET's assets, enabling works to be appropriately co-ordinated.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			means to ensure co-ordination and consultation is undertaken in relation to any such interactions.	
NGET-008	Development Consent Order	Protective Provisions	<p>There is therefore significant infrastructure being delivered within the same area and potentially within similar timescales. As such, there needs to be careful co-ordination and consultation undertaken between NGET and the Green Hill Project to ensure that each project can be delivered without unduly interfering with any other project. This is provided for in the form of protective provisions that NGET is seeking to include in the Order (NGET Protective Provisions).</p> <p>In light of the above, NGET require protective provisions to be included within the Order to ensure that its existing and future assets and interests are adequately protected, as well as to ensure that:</p> <ul style="list-style-type: none"><li>(a) all NGET interests and rights including rights of access to the substations listed above are unaffected by the power of compulsory acquisition, temporary possession, and the grant and/or extinguishment of rights as set out in the Draft Order; and</li><li>(b) appropriate protection for the NGET Assets and any other retained apparatus is maintained during and</li></ul>	<p>The comment is noted and the Applicant agrees that protective provisions for NGET provide the mechanism to achieve the required co-ordination of works. The Applicant is discussing the form of protective provisions with NGET.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>after construction of the Authorised Development. This includes compliance with all relevant safety standards as further described below.</p> <p>NGET seeks to secure protective provisions broadly in line with those that were included in the recently granted Awel y Môr Offshore Wind Farm Development Consent Order (the AYM DCO) and the Mona Offshore Wind Farm Order (Mona DCO).</p> <p>The protective provisions secured under the AYM DCO and the Mona DCO included safeguarding provisions as per paragraphs 3 to 7 of NGET's Protective Provisions, along with associated amendments to other standard protective provisions to ensure that they apply to the future NGET works/apparatus/land, e.g. the protective provisions concerning the acquisition of NGET's land by the Promoter in paragraph 11 of NGET's Protective Provisions – without appropriate amendments, these protective provisions would not apply to third party land required for the WMEL Project.</p> <p>Without specific safeguarding provisions for NGET's future upgrade projects, the protective provisions currently included in the draft Order only relate to existing NGET apparatus and land and so there is nothing</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>to prevent the Green Hill Project from adversely affecting the NGET WMEL Project and the SGRE Project as set out above to the serious detriment of NGET's undertaking.</p> <p>As such, NGET considers that it is reasonable and appropriate for the safeguards and protections secured for NGET's benefit in the AYM DCO and the Mona DCO to be included in the Draft Order here. For completeness, we include a copy of the NGET Protective Provisions are included at Appendix 2.</p>	
NGET-009	Development Consent Order	Protective Provisions	<p>NGET's solicitors (Addleshaw Goddard LLP) have not yet been contacted by the Applicant's solicitors and therefore negotiation of the protective provisions is yet to commence. It is noted that a set of protective provisions for the benefit of NGET have been included at Part 3 Schedule 15 of the Draft Order which largely align with NGET's Protective Provisions save for references to the SGRE Project and the WMEL Project. NGET requests that the Applicant engages with its solicitors as a matter of urgency in order to progress discussions expeditiously given the commencement of the Examination. For the reasons set out above, NGET considers that it is absolutely necessary for the NGET Protective Provisions to be included in the</p>	<p>The Applicant confirms that its solicitors have contacted NGET's solicitors and the form of protective provisions are being discussed.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Order and will continue to make robust submissions throughout the Examination until this principle is agreed and the wording is included within the Order.	



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

### 4.1 CPRE Northamptonshire

Table 4.1: [REP1-246](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-001	General Matters	Overall	<p>Although not formally qualified, I have been the Renewable Energy Specialist for CPRE Northamptonshire for 20 years. In this time, I have responded to many EIA applications, presented evidence at appeals and worked nationally within CPRE to develop national CPRE policy relating to renewable energy. CPRE is very concerned about the impact of climate change but we seek to ensure that renewable energy schemes are sited in appropriate locations. We assess solar farm applications against our solar farm policy. The criteria that we use when assessing schemes weighs the following factors:</p> <ul style="list-style-type: none"><li>• The visibility of the scheme in the wider landscape</li><li>• Whether it harms a valued or sensitive landscape</li></ul>	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"> <li>Whether it harms views from settlements and for users of Public Rights of Way</li> <li>Whether it harms the setting of settlements</li> <li>The detrimental impact on food production.</li> </ul> <p>Since the policy was created we have also identified that noise from equipment must also be considered both in the way that it may affect rural residents and how it affects the tranquillity of those enjoying the countryside.</p> <p>This scheme has an accompanying BESS system which brings with it additional risks of fire and pollution.</p>	
CPRE-002	Landscape and Visual Impact Socio-economics Human Health	Landscape mitigation	<p>In its assessments of the scheme the DCO focuses attention on summer impacts after 15 years of operation after the screening is fully mature. While we do not disagree that screening would mitigate the impacts of the scheme, we feel that it is vital to remember that almost a generation would have to pass before screening would be fully mature.</p> <p>We gain the impression throughout the DCO that it understates impacts</p>	<p>The <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> 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 <b>ES Appendix 8.1 [APP-078 &amp; APP-</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			that would be felt locally. In our response to the PEIR we expressed concern that Table 2.1: Sensitivity Criteria in ES Chapter 2 appears to devalue the level of sensitivity for local impacts. If anything, the sensitivity of the local communities that would have to live with the scheme is much higher than others because they would experience impacts on a daily basis. We recognise that the Examining Authority may ultimately judge that national needs override the impacts on local communities, but it is vital that such a judgement should be made in the knowledge of the true level of impacts that the local community are expected to accept.	<b>079]</b> , which has been progressed and agreed with the Local Planning Authorities.  With respect to impacts on local community, particularly in respect to community identity and culture, and the way communities perceive and engage with their surroundings, it is acknowledged that there will be an initial medium- to long-term impact at the onset of the Scheme's lifetime following construction, during which the Scheme will still be a new feature in the landscape. Changes in community perceptions of the Scheme will be gradual and reliant on landscape and ecological mitigation maturing, and use of PRoW and permissive routes onsite becoming more widespread. As such, this is why the assessment of impacts on community identity and culture <b>in ES Chapter 18: Human Health [APP-055]</b> has identified a two-stage assessment outcome for the operational phase of the Scheme: a temporary <b>medium- to long-term minor adverse effect</b> initially, before reducing to a <b>long term minor/negligible adverse effect</b> in the areas most directly affected.
CPRE-003	Design	Operational Lifetime	Although the scheme is presented as a single scheme, it comprised of eight separate sites of solar PV panels connected together with underground cabling and a separate BESS. It	The Scheme consists of a number of Sites which together are the Scheme.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			seeks an unusually long 60-year permission.	<p>Although the Scheme comprises a series of independent areas of Sites, they are set within an extensive agricultural landscape.</p> <p>With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so 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.</p> <p>The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach than having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>ecology and nature conservation and retain the existing landscape pattern.</p> <p>In relation to the length of time of the operational lifetime, please refer to the Applicant's response to comment 'SBMP-005' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>.</p>
CPRE-004	Landscape and Visual Impact	Site composition	<p>Spatial planning is a vital technique employed when creating local plans. Its purpose is to define zones where compatible activities take place and to prevent adverse impacts being experienced by sensitive receptors or at least restrict the number of receptors affected. In particular industrial development is deliberately concentrated into industrial estates in order to contain its adverse impacts to a limited area. Industrial units are not scattered across the plan area.</p> <p>The Tillbridge scheme shown below is an example where a scheme's impact is minimised by concentrating the development into a single site. This minimises the area where its adverse impacts are experienced. By contrast the eight separate solar PV sites and BESS that make up the Green Hill scheme does the opposite. It scatters the scheme across 9 sites,</p>	<p>Spatial Planning</p> <p>The Applicant notes this comment and can confirm that West Northamptonshire and North Northamptonshire adopted Local Plans do not allocate any areas for renewable energy, therefore development proposals for renewable energy either being considered as a Town and Country Planning Act application or at the Development Consent Order scale cannot follow a plan led approach in terms of there being allocations which are direct where these types of developments have been forward planned.</p> <p>The emerging Milton Keynes Local Plan does have an emerging designation of 'areas of search for wind turbines and solar farms' under policy CEA11 which covers Site G. This emerging Local Plan is currently at consultation for Regulation 19.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>and within those sites the panels are not even confined to a single block with Site F alone consisting of 7 distinctly separate blocks.</p> <p>There are four consequences of the use of multiple sites:</p> <ul style="list-style-type: none"><li>• Receptors would experience the scheme as at least eight separate schemes if not many more</li><li>• The area adversely impacted by the scheme is far greater than if it was concentrated on a single site</li><li>• The land take is significantly greater than a concentrated single site scheme</li><li>• Villages are surrounded by blocks of panels</li></ul> <p>In our response to the PEIR CPRE expressed the view that because of the multiple sites, it was necessary to assess the internal cumulative impact of the separate sites within the scheme however this has not been included in the DCO.</p>	<p>Please refer to the Applicants comments above to 'CPRE-003' relating to the Scheme having dispersed sites.</p> <p>The Scheme comprises a series of independent areas of land or Sites set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole.</p> <p>The discrete areas of land in the Scheme are placed far apart so that the Scheme will not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape.</p> <p>The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.</p> <p>This 'network of sites' approach demonstrates good design by allowing for a fine-tuning approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing, and provide enhanced landscaping and vegetation. This demonstrates how the Scheme is sensitive and responsive to place.</p> <p>The LVIA <b>[APP-045]</b> includes an assessment of the Cumulative Effects of the Scheme based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views) visibility.</p> <p>Cumulative Impact of Dispersed Sites</p> <p>The LVIA <b>[APP-045]</b> includes a through and robust Cumulative Assessment.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>In reaching the overall assessment of effects associated with the Scheme the cumulative effects of each of the Sites and Cable Route Corridor are assessed and combined to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme.</p> <p>The cumulative effects of each of the Sites and Cable Route Corridor are assessed and the combined set of effects of the Scheme and an overall conclusion is given on where likely significant effects might occur as a result of the Scheme.</p> <p>Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[APP-041]</b> contains an Assessment of Cumulative Site Effects on the different Landscape Study Areas and Landscape Fabric with a detailed examination of effects set out within section 8.9 of the LVIA.</p> <p>Cumulative Site Visual Effects are addressed within section 8.9 of the LVIA <b>[APP-045]</b> with Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[APP-041]</b> containing details on the individual Visual Assessments.</p> <p>This includes an assessment of both Combined views and Sequential views.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Viewpoints have also been selected to illustrate landscape character effects or likely Cumulative Effects of the Scheme.</p> <p>A cumulative assessment of the Scheme and other Cumulative Developments is included within the LVIA <b>[APP-045]</b>, assessing both the cumulative landscape and visual effects of the Scheme in conjunction with other local developments. The Cumulative Developments assessment considers the additional effects resulting from the Scheme in combination with the effects resulting from other similar developments, these being other renewable projects taken together, further details can be found in Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[APP-041]</b>.</p>
CPRE-005	Energy Need and Policy	Need for solar Operational life	<p>The 60-year permission requested is a generation longer than the upper limit of 40 years anticipated in NPS EN-3 (para 3.10.56). There are several reasons why it is not in the national interest to commit these sites for even a 40-year permission:</p> <p>1. Global emissions are increasing making further climate change inevitable and it is essential that there is sufficient flexibility to rapidly react to and mitigating its impacts</p>	<p>In relation to the length of time of the operational lifetime and technology advances, please refer to the Applicant's response to comment 'SBMP-005' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>.</p> <p>In relation to Para 1, the Applicant notes that continuing global emissions underpin the urgent need for low carbon infrastructure such as the Scheme.</p> <p>In relation to Para 2, the Applicant refers to the <b>Statement of Need [APP-556]</b> which</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>2. Solar PV is an evolving technology and it is highly unlikely that even by the time of repowering that a like for like repowering would be possible or represent the best climate use for the site at that time</p> <p>3. Solar PV is being gradually rolled out within the built environment which could make ground mounted sites unnecessary enabling them to be repurposed</p> <p>4. New or emerging technologies may render intermittent renewables such as solar PV obsolete</p> <p>5. The current use of the site is as agricultural land which may be vital to return it to food production in order to bolster food security</p> <p>Although the UK has made substantial cuts in emissions, global emissions are still rising and in the last year they rose at the fastest rate ever recorded. International support for net zero policies is falling significantly with only 64 countries submitting plans for carbon reductions to the COP30 summit. This makes it very likely that the effects of climate change will increase regardless of any reductions in the</p>	<p>provides evidence that solar technology can also generate more energy per hectare of land than other electricity generation technologies, for example by growing crops for energy. By following good design principles, solar schemes can generate a similar amount of energy per hectare of land as onshore wind, while the environmental effects of solar schemes may be significantly lower.</p> <p>In relation to Para 3 and Para 4, The <b>Statement of Need [APP-556]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". Please also see the response to comment 'SGHS-004' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>.</p> <p>In relation to Para 5, please see the response to comment 'ScPC-002' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>.</p> <p>The <b>Statement of Need [APP-556]</b> describes Government's view that large capacities of low-carbon generation will be</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>UK. It would therefore be irresponsible to unnecessarily commit important resources that could be better redeployed to mitigate or adapt to climate change. In the case of this site, it is very likely that the need for increased food security will exceed the need for the relatively modest amounts of solar generation at some point within a 60-year permission.</p> <p>Energy generation technology is developing rapidly making it extremely likely that the needs of UK electricity generation system will bear little resemblance to the current vision. It is quite possible that ground mounted solar PV will have been made unnecessary or at the very least greatly reduced by other more reliable and efficient technologies. At the very least it is extremely likely that fewer panels would be necessary to repower the scheme thus allowing part of the site to be released.</p> <p>The UCL study Shout from the rooftops: delivering a common sense solar revolution<sup>1</sup> commissioned by CPRE found that there is an achievable potential for 117GW of solar PV generation to be achieved within the built environment. New</p>	<p>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” as per NPS EN-1.</p> <p>The <b>Statement of Need [APP-556]</b> 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.</p> <p>The 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.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>housing is now required to incorporate solar PV and companies like Big Solar Co-op are partnering with owners of large commercial buildings to retrofit solar PV systems. Warehouses are also being built as solar-ready in anticipation of their roofs being used for solar generation. If the potential for rooftop generation is realised, additional ground mounted solar generation could exceed the capacity of the grid to absorb its limitations.</p> <p>It is not possible to predict where technology will be in 10 years' time, let alone 60. Small modular nuclear reactors are likely to be available if not nuclear fusion. Alternatively solar PV could even become substantially more efficient enabling land to be released back for other uses.</p> <p>It must be remembered that the greatest identified risk from climate change that can be addressed at a national level is the threat to national food security. Natural England and the Climate Change Committee are already raising concerns about this issue which is explored in detail under</p>	





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the Climate Change section of this document below.	
CPRE-006	Climate Change Energy Need	Limits of solar	<p>Climate change is a global problem making it important to take a holistic view and not constrain the assessment to the scheme sites. It would be counterproductive to make climate improvements onsite only to cause similar or even greater harm elsewhere as a consequence of the changes caused by the scheme. It is also important to understand the actual benefits of the scheme and not disguise them behind misleading statistics or averages. Because Solar PV is not a dispatchable form of generation there are limits to how much capacity can be effectively incorporated into the grid. The presence of battery storage that can store a limited amount of power for later release into the grid would be helpful in reducing the problems of balancing supply and demand but because battery storage typically discharges over a period of ½ to 4 hours it cannot be treated as a firm source of supply especially in the winter months when there are prolonged periods of darkness.</p>	<p>The <b>ES Chapter 7: Climate Change [APP-044]</b>, considers the global climate as the study area recognising each emission and savings in greenhouse gases have cumulative global impacts regardless of location (Section 7.4). In Section 7.8, the assessment concludes that the Scheme has a beneficial and significant impact on the global climate change as it will reduce greenhouse gas emissions compared to a scenario without the Scheme.</p> <p>The <b>Statement of Need [APP-556]</b> 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" as per NPS EN-1.</p> <p>The NPSs confirm that assets which provide flexibility to the national electricity system, or to the energy system generally, are also needed to achieve national decarbonisation and energy security aims. The NPSs state that government is supportive of solar that is co-located with storage to maximise the efficiency of land use <b>[NPS 3, Para</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response										
				<b>2.10.10].</b> The Scheme, which consists of a large-scale solar farm with associated energy storage, is therefore fully aligned with the government’s aims.										
CPRE-007	Energy Need	Solar pipeline	<p>The September 2025 DENZ Solar Photovoltaics Deployment spreadsheet<sup>2</sup> states that 20GW of solar capacity is already deployed in the UK. The Renewable Energy Planning Database<sup>3</sup> only contains statistics for schemes that require planning permission which excludes smaller deployments but even so it provides a good guide to progress towards meeting Solar PV targets.</p> <p>The September update shows the following:</p> <table><tr><th>Planning Status</th><th>Installed Capacity (MW)</th></tr><tr><td>Operational</td><td>10,194</td></tr><tr><td>Under Construction</td><td>2,411</td></tr><tr><td>Awaiting Construction</td><td>19,768</td></tr><tr><td>Application Submitted</td><td>12,209</td></tr></table>	Planning Status	Installed Capacity (MW)	Operational	10,194	Under Construction	2,411	Awaiting Construction	19,768	Application Submitted	12,209	<p>Section 6.3 of the <b>Statement of Need [APP-556]</b> describes current UK project pipelines and historical levels of attrition in those pipelines. Section 3.7 of the <b>Statement of Need [APP-556]</b> describes the ongoing Connections Reform process which seeks to remove stalled projects from the connection queue and better utilise existing network capacity to reduce connection timelines.</p> <p>The Clean Power 2030 Action Plan establishes a range of 45 to 69GW of solar capacity operational before 2035, subject to similarly large growth requirements in capacities of all other technologies; and therefore supports the development of a robust pipeline of projects for future development and delivery.</p> <p>Section 3.9 of the <b>Statement of Need [APP-556]</b> explains that government is “expecting an increase in planning applications with the Clean Power 2030 target” and that planning applications will need to continue to be made if the Clean Power 2030 target is to be met.</p>
Planning Status	Installed Capacity (MW)													
Operational	10,194													
Under Construction	2,411													
Awaiting Construction	19,768													
Application Submitted	12,209													



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Appeal Lodged 200</p> <p>Total 44,782</p> <p>This shows that there is a capacity of 12.6 GW schemes either operational or under construction. The capacity including schemes with permission totals 32.3GW. There is a further 12.4 GW in the planning system either with permission or at appeal. Given the 10GW discrepancy between the operational capacities in the two databases it must be assumed that rooftop or other schemes that do not require planning permission account for an additional 10GW of operational schemes.</p> <p>Although some of the schemes awaiting construction may not be delivered and some of the schemes that are undecided may not progress to construction, nevertheless there would need to be an unprecedented attrition rate for the target to be missed.</p> <p>The most likely reasons that the targets might be missed are that it may prove impossible to construct all the schemes that are awaiting</p>	<p>The Applicant notes that National Policy Statement EN-1 confirms in paragraphs 3.2.6 to 3.2.8 that the Secretary of State should assess all applications for renewable energy infrastructure on the basis that there is an urgent need for this infrastructure, and that the specific contribution of an individual project does not need to be established. Paragraph 2.3.9 of NPS EN-3 further acknowledges that because renewable energy resources can only be developed where the resource exists, and because there is no limit on the need established in NPS EN-1, a consecutive approach should not be used in considering applications for renewable energy projects.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			construction or that the grid cannot be adapted in time to successfully integrate so many intermittent schemes into the grid.	
CPRE-008	Planning	Planning balance and benefits	It is important to quantify the actual benefits of the scheme so that they are weighed appropriately in the planning balance. There are three benefits of the scheme: the renewable energy produced, the BESS storage for smoothing differences between generation and demand and the biodiversity net gain.	The Applicant has set out the benefits of the Scheme in section 7.2 of the <b>Planning Statement Revision A [EX2/GH7.15_A]</b> and presents the planning balance which considers the benefits and the harms of the Scheme.
CPRE-009	Principle of Development	Generation	The table within the submission document sets out the applicant's predicted generation broken down by generation period. However, the averages hide the differences between the amount of electricity generated in midwinter when there is just 7.46 hours of weak sunlight and the far greater amount generated in midsummer when there is 16.51 hours of strong sunlight. Historic data suggests that this could result in a capacity factor of under 3% in December when demand is at its greatest. This means that the average daily output in December could be the same as a 15MW power station	NPS EN-1 Para 3.3.23 outlines The Government's view is that " a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar".  Section 9.5 of the <b>Statement of Need [APP-556]</b> evaluates the contribution made by different generation classes to overall national demand throughout a year on a month average basis and a national portfolio of GB electricity generation. The analysis demonstrates that the deployment of large-scale solar alongside offshore wind, onshore wind, and low carbon baseload assets provides the opportunity for a lower capital, lower curtailment (therefore lower cost) energy system through diversity of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The renewables industry has always used selective statistics to promote their schemes and in our view the "115,000 homes supplied" metric is grossly misleading because it gives the impression that the Green Hill scheme could supply a sizeable town. However, not only do homes only account for only 26% of the national energy consumption, their electricity consumption accounts for just 6% of that total.	asset type than that provided by scenarios which do not include solar generation.  NPS EN-1 describes that "Demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity" and therefore that a large capacity of low-carbon electricity generation is required to meet future electricity demand so keeping the country on track to deliver its legal requirement to achieve net zero carbon emissions nationally by 2050.
CPRE-010	Principle of Development	Generation	BESS generally discharge over 30 mins to 4 hours when called upon. It is generally considered that the primary use of a BESS is for electricity arbitrage – taking excess generation from the grid at times of low demand and selling it back at times of high demand. Although this provides a useful function within the grid, it does not in combination with the solar PV make the scheme a firm source of electricity especially during the winter months.	Section 6.11 of the <b>Statement of Need [APP-556]</b> describes the roles flexible assets can play in supporting low carbon generators in their operation in the GB electricity system. This includes storing energy when it is generated and releasing it when it is needed. Please also see the Applicant's response to CPRE-009 in this document.
CPRE-011	Ecology and Biodiversity	Biodiversity Net Gain	Land used for intensive food production is necessarily low in biodiversity and so it is not difficult to	The Scheme ensures that biodiversity losses within the Order Limits have been fully mitigated and compensated for, and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			create a net gain by taking it out of use. The BNG benefits of the scheme do provide additional diversity and habitat on site. However, the question arises as to how the food production currently produced across the site would be replaced. If it is replaced by converting biodiverse land elsewhere into use as farmland for intensive food production, then the onsite net gain could well be outweighed by the loss at the replacement site.	<p>that a significant net gain for biodiversity will be delivered, as detailed in <b>ES Appendix 9.13 Biodiversity Net Gain Assessment (Revision A) [REP1-043]</b>. Changes to land use outside of the Order Limits is conjecture and is outside of the remit of the assessment for the Green Hill Solar Farm scheme.</p> <p>Please refer to the response to MAPC-011 in The Applicant's Responses to Relevant Representations with regard to impacts on food production.</p> <p>The land for the proposed Sites represents only 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK, and therefore it is not considered to have a significant impact on national food production and security.</p>
CPRE-012	Agriculture and Soils	Reduction in food security	The land proposed to be taken for the scheme is 3,000 acres (1,200 hectares) of prime agricultural land, 2/3 of which is BMV with the remainder being classified as Grade 3b. An additional 415 acres (168 hectares) for the 31Km cable corridor. Rather than preserving current levels of food security, the scheme reduces it.	<p>Please refer to the Applicant's response to comment 'MFr-004' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> on matters relating to food security.</p> <p>The Government's position, as set out in the Solar Roadmap (Department for Energy Security and Net Zero, June 2025) is that "the biggest risk to food security and the natural environment is the climate and</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Although the UK has made substantial progress in reducing carbon emissions, in 2024 global emissions rose at the fastest rate since records began. It would therefore be grossly irresponsible for the government to fail to prepare for the predicted impacts of climate change because they are seemingly inevitable. The Climate Change Committee (CCC) are raising concerns that too little is being done to adapt to climate change and have written to the government advising them that:</p> <p>"It is clear we are not yet adapted for the changes in weather and climate that we are living with today, let alone those that are expected over coming decades."</p> <p>They go on to stress that:</p> <p>A well-adapted UK should deliver a future where:</p> <p>....</p> <p>The UK's food security is preserved and key goals for environmental improvement and support for nature are delivered, despite a changing climate</p>	<p>nature crisis. That is why it is important that the UK takes a leadership role, working with partners around the world, in accelerating to net zero, including by rapidly expanding solar power generation".</p> <p>The potential effect on UK food security is addressed in the <b>Farming Report [APP-571]</b> section 9, which concludes that the effect will be negligible.</p> <p>The land within the cable route corridor (CRC) will only be affected temporarily, and only for a small part of the land within the CRC, for the duration of operations to install the cable.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-013	Transport and Access	Increased Transport emissions	<p>Local food producer Weetabix proudly seeks demonstrate that they are minimising food miles by sourcing its wheat locally including from land that will be lost to the scheme. In fact, evidence of this is shown in the winter photograph of Viewpoint 3W where a Weetabix banner is included in shot. The land will not be available if the DCO is made creating additional carbon costs when replacement supplies have to be transported from a greater distance.</p> <p>The network of bridleways and footpaths across the different sites is currently widely used for recreation. Even though the network will not be reduced, the industrialisation of the routes would cause current users to travel to more distant rural sites. Instead of walking from their villages on the local footpath network as they do now, they will take car journeys to travel to more attractive and tranquil locations creating another carbon cost.</p>	<p>Please refer to the Applicant's response to comment 'SGHS-019' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> on matters relating to loss of agricultural land specifically on the land which grows wheat for Weetabix.</p> <p>Impacts on PROWs and recreational routes are set out in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its appendix (Revision A) <b>[REP1-079]</b>.</p> <p>During the Scheme's operational lifetime, the routing of all existing PROWs is preserved, with additional commitment to providing an enhanced user experience through additional hedgerow screening, planting of tussocky grassland to enhance ecology and biodiversity next to PROWs and providing upgraded permissive links to increase PROW network connectivity. These measures are secured through the <b>OLEMP Revision A [REP1-137]</b> which itself is secured by Requirement 7 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>The Scheme will be providing upgraded permissive links to increase PROW network connectivity, which will be managed in accordance with the <b>OPROWPPMP Revision A [REP1-147]</b>, which is secured by Requirement 18 in Schedule 2 to the</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<b>Draft DCO Revision A [REP1-008]</b> . Please also refer to ECO-005 in respect of the potential for the Scheme to affect local wildlife.
CPRE-014	Agriculture and Soils	Potential Release of Sequestered Carbon and loss of biodiversity	Since there is no less demand for food, the food currently produced onsite will have to be grown elsewhere. This is likely to result in land currently not used for food production being ploughed up releasing sequestered carbon and reducing the biodiversity at the replacement site. If the replacement food is imported then there will be substantial carbon costs incurred in transportation.	<p>The HM Government “Land Use Consultation” (January 2025) anticipates the need for significant land use change or management change to deliver housing, energy, environmental and climate benefits, involving 19% of agricultural land. It is noted that “the Government is committed to maintaining food production. Our assessment is that, based on historical trends of productivity improvement, and supported by new and emerging innovations, the impact of these land use changes on domestic food production will be offset by productivity improvements” (pages 77 – 79).</p> <p>The concerns of the CPRE are noted, but there is no evidence to indicate that land not currently used for agriculture will need to be ploughed up.</p>
CPRE-015	Landscape and Visual Impact	Consultation	<p>We are also disappointed that the applicant has not included some of our responses to the PEIR regarding the LVIA assessment.</p> <p>It has also been difficult to assess the LVIA within the DCO. In part this is understandable because it effectively</p>	<p>A summary of comments made by CPRE in response to statutory consultation and targeted consultation for the Scheme is provided in Appendix 5.8 of the <b>Consultation Report [APP-031]</b> and Appendix 5.12 of the <b>Consultation Report [APP-035]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			deals with the equivalent of 9 separate schemes; nevertheless, we feel that it could have been presented in a less disjointed way. At ISH1 we discovered that we were not the only consultees who had found the LVIA documentation extremely difficult to navigate. The LVIAs for other schemes that we have assessed have not been as disjointed and complex. Even viewing the LVIA photomontages has been difficult because no physical copy of the DCO has been made available for public inspection.	An indexed copy of the detailed LVIA assessment has been provided at Deadline 1 <b>[REP1-041]</b> .  An 'LVIA Orientation' presentation was held on the 13 <sup>th</sup> November 2025 to aid Interested parties' navigation of the LVIA and associated Appendices.
CPRE-016	Landscape and Visual Impact	Process and Methodology	While reading the grids which list the criteria by which the qualities of the landscape and the impact of change are listed as High, Medium, Low and Very Low, we felt that these set the bar unusually high when judging landscape value and unusually low when assessing the extent of harm. We wondered whether different criteria were used for NSIP applications and so we compared a Green Hill grid with one used in the LVIA for the Tillbridge DCO and found that the Tillbridge criteria set different thresholds	The <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> 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 <b>ES Appendix 8.1 [APP078 &amp; APP079]</b> , which has been progressed and agreed with the Local Planning Authorities.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-017	Landscape and Visual Impact	Representative Viewpoints	<p>At ISH1 we have raised our concerns with the way in which viewpoints were agreed. When the LPAs agreed the viewpoints they were not aware of the proposed layout of the panels and chose locations that they anticipated would experience the greatest impacts based on the assumption that panels would be present in the foreground close to the red line boundary of the sites. In many of the viewpoints panels are excluded from the foreground and so the viewpoints do not serve the purpose that the LPAs had intended. It is therefore not safe to rely on the assessment of these viewpoints as being of the greatest impacts of the scheme.</p> <p>Even looking at other viewpoints, we see cases where the full impact of the scheme is not demonstrated. This is common when developers persuade LPAs to accept a single viewpoint that serves two purposes but in doing so the viewpoint does not show the full extent of the impact. An example within the LVIA is Viewpoint 1 (Lamport Hall) which is not taken from the entrance to the house or from the first-floor function rooms, but from a footpath in a largely unvisited part of</p>	<p>The <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> utilises a 'Receptor' based assessment, using viewpoint photography and photomontage to support the understanding of effects upon receptors within the receiving landscape. Viewpoint photography locations were identified through desk studies and verified through fieldwork to illustrate visual baseline conditions in and around the Scheme. Views selected are representative of different receptors to aid the description of effects on both Landscape and Visual receptors. Positions of viewpoint photography were agreed in consultation with Landscape Officers from North Northamptonshire and Milton Keynes and fixed prior to verified photography being undertaken. Consultation with the relevant consultees and planning authorities has played an important part in selecting the viewpoints to support the Landscape and Visual Impact Assessment (LVIA) process. Viewpoint selection follows good practice guidance and in particular paragraphs 6.18 to 6.20 of GLVIA3. The viewpoints proposed are used to aid the description of effects on both Landscape and Visual resources and have been utilised for visual assessment purposes.</p> <p>For the purposes of the LVIA <b>[APP-045]</b> and in keeping with the approach set out</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the gardens. The footpath is at a lower level than the house and near to a hedge that obscures much of the view. All visitors to the house enjoy the view as they leave from where the hedge is barely noticeable. The photographs below show that the house is at a higher level than the garden.	within GLVIA3, all viewpoints have been taken from publicly accessible land during both summer and winter months to ensure a worst-case scenario is assessed and illustrated.
CPRE-018	Landscape and Visual Impact	Limited Visual Modelling	<p>We are very surprised by the lack of visual modelling and that so few of the viewpoints have photomontages or even wireframes that indicate the location and extent of the infrastructure. We are also surprised that where there are photomontages, they do not model the mature site in winter when the screening is not in leaf and may not effectively screen the scheme. This does not present the worst case scenario as would be expected under the Rochdale Envelope.</p> <p>In most cases the impacts are not modelled but there is an indication of the horizontal extent of the view that would contain infrastructure. This is of little value when assessing the impact unless it is assumed that the infrastructure would fill the view. There are some viewpoints that only</p>	<p>The LVIA <b>[APP-045]</b> 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 Statement Figure 8.10 Viewpoint Locations [APP-308].</p> <p>Where photomontages have been produced, they show Winter Year 1, and Summer Year 15 representations. This is an industry standard approach to visualisation production, with the Winter Year 1 is considered to represent the Rochdale Envelope 'Worse Case' scenario, as this represents a point in time when infrastructure is in place, but the proposed embedded landscape mitigation planting is immature and not providing any notable additional screening of infrastructure.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>have photographs making it particularly difficult to assess the likely impact.</p> <p>We are also concerned that the medium distance photomontages represent the panels as solid dark grey areas. This would only be an accurate depiction if the panels were directly facing the viewer on a dull day. We noted that in ISH1 the applicant said that panels were represented at full tilt because this is the worst case however in our view, this can be the best case in terms of visual impact. The industrial nature of panels is far more apparent when they are viewed from the side or rear and when viewed from the side when they appear as rows of grey stripes within views.</p> <p>We consider the poor level of visual modelling and lack of modelling of the 15 year winter views to seriously compromise the ability to assess the impact at the viewpoints and question how the applicant could make a fair assessment without more information.</p>	<p>The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation. Viewpoint photography and photomontages are included within Figure Series 8.14 <b>[APP-334 to APP-400]</b></p> <p>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 <b>[APP-045]</b>.</p> <p>Locations of the required photomontages and Accurate Visual Representation (AVR) were agreed with the Landscape Officer representatives for North Northamptonshire and Milton Keynes City Council. At the request of NNC, 5 viewpoints have been used to produce photomontages at Year 60 (post decommissioning) to demonstrate the long term legacy landscape. The following viewpoints have been used to produce the Year 60 photomontages: VP9, VP18, VP31, VPNN1 and VPNN13.</p> <p>The Photography and Photomontage Methodology is included within Appendix 8.1 <b>[APP-078 and APP-079]</b>.</p> <p>Within the 3D model, 4.5m high tracker panels have been modelled with the panels illustrated at 'full tilt' and facing East to</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>represent a worse case scenario. This arrangement of the panels is fixed throughout all of the visualisations regardless of the relationship of the viewpoint to the scheme to ensure continuity throughout the imagery.</p> <p>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, MSevision (MSE) constructed a full 3D model of the Scheme using the layout data supplied by Lanpro, OS 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 seen within the Photography and Photomontage Methodology is included within Appendix 8.1 <b>[APP-078 and APP-079]</b> on pages 4 to 9.</p>
CPRE-019	Landscape and Visual Impact	The Weight Given to Screening	The LVIA is heavily reliant upon screening to mitigate the adverse impact of the scheme and suggests that once mature it would have a beneficial impact on the landscape. This downplays almost a generation during which the screening has not become fully effective and	As per industry guidelines (GLVIA3), standard practice, and as tested at other DCO submission for similar developments, the LVIA undertakes an assessment of the magnitude of impact (nature of effect) of the Scheme during the construction period (winter), operation at year 1 (winter) and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>fundamentally fails to understand the character of the Northamptonshire countryside and what constitutes its most attractive attributes. There is also an over-reliance on the effectiveness and durability of the screening.</p> <p>The 60 year permission being sought should not tempt the assessment of its impacts to be judged solely on its mature impact. The proposed screening would only reach maturity after 17 years from the start of construction and during this period the scheme would be clearly visible as an industrial intrusion in the countryside. This is a considerable period and substantial weight should be given to how long the communities are being asked to accept the impacts on their environment.</p>	<p>operation at year 15 (summer) and at decommissioning stage (winter).</p> <p>A future year of 2044 (15 years post first operation of the Scheme) is considered for the LVIA <b>[APP-045]</b> and supporting appendices i.e., 15 years after commissioning, which is the typical period for the maturation of landscape planting. However, in reality mitigation would begin to take effect in advance of this point. For example, the OLEMP requires that the existing hedgerows are 'grown out' to a target height of 4m – 4.5m. Growth rates are estimated to be 0.4m a year, and depending on the existing height of the hedgerows, could take considerably less than 15 years to reach this desired height.</p> <p>The LVIA recognises that the proposed new landscape mitigation measures will take time to establish as set out within para 8.8.12 to 8.8.15 of the LVIA <b>[APP-045]</b>.</p> <p>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</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>represents an average rather than a site-specific prediction.</p> <p>Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the <b>OLEMP Revision A [REP1-137]</b>. This includes measures for the formative pruning and ongoing long term management of proposed and existing hedgerows, trees and woodland within the Scheme.</p> <p>The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>The LVIA <b>[APP-045]</b> does not identify beneficial effects to Landscape Character as a result of the implementation of the landscape scheme during the construction period or operational lifetime of the Scheme.</p> <p>The proposed planting has been designed to provide greater enclosure across the individual Sites to help minimise the appreciation of the Scheme and to mitigate wider ranging adverse effects of the infrastructure on the character of the receiving landscape. This enclosure helps mitigate and therefore reduces the level of effect associated with the Scheme.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>However, the LVIA recognises that despite this, as a consequence of the development adverse effects would remain until the Scheme was decommissioned. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme. At the point the Scheme is decommissioned the landscape proposals help provide the long term legacy landscape benefits as set out within the LVIA.</p> <p>The landscape proposals are substantial and the beneficial effects associated with these to landscape fabric are set out within the LVIA, with these associated with the tangible gains provided to landscape fabric.</p>
CPRE-020	Landscape and Visual Impact	The Weight Given to Local Receptors	<p>In our General Comments we observed that impacts upon the local communities appear to be downgraded within the methodology. We feel that this is the case within the LVIA assessments. A clear case in point is the decision to only assess A roads for sequential cumulative impacts. There is little consideration of the impacts on the communities that would find themselves living in a landscape that is scattered with solar schemes.</p>	<p>The <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> includes a thorough and robust Cumulative Assessment.</p> <p>The <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> includes an assessment of the Cumulative Effects of the Scheme based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views) visibility.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>GLVIA3 defines types of cumulative visual effect as either: Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views.) GLVIA 3 Table 7.1 regarding Cumulative visual effects states: "Sequential: Occurs when the observer has to move to another viewpoint to see the same or different developments. Sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths"</p> <p>Given GLVIA3's referral to major roads, it is important to note that the Department for Transport classifies Major Roads to include motorways and all class 'A' roads. These roads usually have high traffic flows and are often the main arteries to major destinations. Minor roads comprise 'B' and 'C' classified roads in addition to unclassified roads.</p> <p>The focus of the Sequential Assessment should therefore be undertaken upon Major Roads.</p>
CPRE-021	Landscape and Visual Impact	Avoiding Local Vegetation	When we were reviewing the photography provided with the PEIR we observed that in some localised vegetation obscured part of the view and commented: "... it is very concerning that local vegetation often hides the impact raising suspicion that the precise viewpoint has been	Photography has been undertaken following best practice as set out within the Landscape Institutes Technical Guidance Note TGN 06/19. As set out in the response to CPRE-018, and within greater detail within the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>chosen to under-represent the impact rather than to illustrate it. In such cases best practise states that the viewpoint should be relocated.”</p> <p>Best practice states that where there is localised vegetation or other localised foreground clutter the viewpoint should be adjusted so that it does not interfere with the view.</p>	<p>Responses to Action Points <b>[REP1-162]</b>, photography was undertaken by MS Envision who are leading photography and visualisation specialists operating across the UK.</p> <p>The Photography and Photomontage Methodology is included within Appendix 8.1 <b>[APP-078 and APP-079]</b>.</p>
CPRE-022	Landscape and Visual Impact	Showing Information in Context	<p>“The DCO should include a map of the viewpoints overlaid on an augmented ZTV diagram (Figure 7.9.3.1) to demonstrate their suitability.”</p> <p>Such a map would instantly show whether the viewpoints would be expected to have views of the scheme instead of requiring the reviewer to try to accurately locate viewpoints on a ZTV where the underlying map details are largely obscured. This disjointed approach is common in the DCO with another example being that the representative noise monitoring locations and the noise sensitive properties are shown on separate figures.</p>	<p>The Applicant has updated the suite of ZTV figures overlaid with the viewpoint locations as requested please see submissions <b>[EX2/GH6.4.8.9 including EX2/GH6.4.8.9.1 to GH6.4.8.9.18]</b>.</p> <p>It should be noted that ZTV's provide a starting point in the assessment process and therefore provide a 'worst case' illustration of theoretical visibility and assume that if any of the Scheme is visible it will be shown on the ZTV. ZTV are used to illustrate the area from where it may be theoretically possible to view all, or part, of the Scheme, however they are a tool to support on Site assessment and cannot be wholly relied upon to provide a definitive visual envelope. Often due to localised planting not included within the ZTV modelling the visual envelope of a development is considerably smaller than indicated on the ZTV. ZTVs are a helpful tool in supporting experienced professions</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				when undertaking on site analysis and assessment of a development.
CPRE-023	Landscape and Visual Impact	Restricted Study Areas	<p>We also expressed our opinion that the proposed extent of the different study areas were unduly restricted:</p> <p>0.5km</p> <p>The cable routes will have a significant adverse impact during the construction phase but even when they are back-filled there will be an ongoing visual impact if they remain protected.</p> <p>In this case cable routes will remain visible as corridors within the landscape which will be notable to those within the landscape and in distant views from elevated locations such as those that show as having over 50% visibility on the augmented ZTV (Figure 7.9.3.1)</p> <p>1km</p> <p>The visual receptors will experience views of the sites and the BESS from well beyond 1km proposed especially those enjoying the countryside on PRow's, for example when they are using elevated routes such as the Three Shires Way. The size, scale and extent of the scheme are such</p>	<p>The <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> 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 <b>ES Appendix 8.1 [APP-078 &amp; APP-079]</b>, which has been progressed and agreed with the Local Planning Authorities which included the extent of the Study Areas.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>that it has the potential to significantly devalue the enjoyment of sensitive receptors that are within this radius or are participating in activities beyond this distance. A comparative example is that of the Didcot power station which, before its recent destruction, was an unwelcome and incongruous industrial intrusion that was a significant detractor affecting many miles of the elevated Ridgeway long distant footpath.</p> <p>2km</p> <p>Other local 49.9MW schemes have used a minimum 5km study area. This is unduly restrictive.</p> <p>5km</p> <p>For the reasons given above for the 1km boundary above, this distance is inadequate where visual receptors experience views from elevated locations.</p>	
CPRE-023	Landscape and Visual Impact	Sequential Cumulative Impact	<p>We are very disappointed that despite the concerns that we have raised in response to the PEIR the applicant has not adequately considered or assessed the sequential cumulative impact both of the different components of the scheme and of the</p>	<p>Please see Applicants response to CPRE-020 above.</p> <p>A cumulative assessment of the Scheme and other Cumulative Developments is included within the <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>scheme with other renewables schemes that would be encountered on common journeys through the landscape.</p> <p>The ES suggests that Sequential Cumulative Impacts need only be considered on A roads, and contends that journeys on minor roads need not be assessed. We feel that this is unacceptable because it excludes the most common impacts experienced, that of those that reside within the local landscape and experience the impacts in their daily lives.</p>	<p>assessing both the cumulative landscape and visual effects of the Scheme in conjunction with other local developments. The Cumulative Developments assessment considers the additional effects resulting from the Scheme in combination with the effects resulting from other similar developments, these being other renewable projects taken together, further details can be found in Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[APP-041]</b>.</p>
CPRE-024	Transport and Access	A Road Journeys	<p>The ES assesses the A509 as a route on which sequential impact would occur, but it so tightly constrains the assessment that it omits the existing schemes that a receptor would encounter on a realistic journey. The A509 is a busy route that connects Wellingborough with Olney, Milton Keynes and the M1.</p> <p>The most affected stretch would be the 10 mile section of the journey between Olney and Wellingborough. A receptor already experiences significant views of the existing two solar schemes at Irchester and Wellingborough/Great Doddington.</p>	<p>The LVIA <b>[APP-045]</b> 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 <b>ES Appendix 8.1 [APP-078 &amp; APP-079]</b>, which has been progressed and agreed with the Local Planning Authorities which included the extent of the Study Areas.</p> <p>Existing solar developments have been identified within the LVIA Baseline and form</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The Green Hill scheme would mean that receptors would additionally encounter Site G and then encounter three blocks of Site F which they would perceive as three smaller developments. This would mean that they would perceive that they had passed 6 solar schemes within in a 10 mile section of their journey.	the landscape context against which the Green Hill Scheme has been assessed.
CPRE-025	Transport and Access	Local Journeys	<p>The residents that live within the villages within or close to the scheme have the potential to encounter multiple discrete components of the scheme on a regular basis as they travel within their landscape in order to access work, services or for leisure. Perhaps the most common routes would be those that take residents to the major centres such as Northampton, Milton Keynes, Wellingborough and Bedford.</p> <p>In rural Northamptonshire countryside it is common that there is not a logical route between destinations along the main road network making it necessary to use local roads for some or all of a journey. Satnav systems frequently route drivers through local roads in such cases. The local roads are also used in preference to the main roads both to avoid congestion</p>	The Applicant notes this comment.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>during rush hour and for the pure enjoyment of travelling through attractive countryside. The latter use would of course cease should the DCO be made and the countryside no longer be attractive.</p> <p>In the spirit of applying the Rochdale Envelope a worse case route might be the journey that I use to attend CPRE meetings which are held at Lamport Hall.</p>	
CPRE-026	Transport and Access	Bozeat to Lamport Hall	<p>This route not only illustrates where main roads frequently do not offer a direct route between destinations but serves as an example of how receptors on local journeys would encounter multiple elements of the scheme. The 17 mile route from Bozeat passes through Easton Maudit, Grendon, Earls Barton, Mears Ashby, Holcot, and Walgrave before reaching Lamport Hall. It would encounter most elements of the scheme in succession: travelling alongside a block of Site F near to Bozeat, between two blocks of Site F beyond Easton Maudit, alongside the BESS, alongside Site E, past views of Site D, Site C, Site B, Site A.2 and Site A. The only component of the</p>	The Applicant notes this comment.





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			scheme that would not be experienced would be Site G.	
CPRE-027	Ecology and Biodiversity	Impacts on wildlife	<p>Ecology is not one of our core areas of expertise however we are concerned about the impacts of the scheme upon the current wildlife populations and the risk posed to the Upper Nene Valley Gravel Pits SPA and RAMSAR site.</p> <p>One of the greatest joys when walking on the PROWs through the tranquil Northamptonshire countryside comes from observing the wildlife that can be seen in the open landscapes. There is a variety of bird species that can be seen and heard but also deer, hares and foxes. We are concerned that the disturbance during construction of the scheme and the change in the nature of the sites once constructed will either displace the resident wildlife, remove the habitat that they rely upon or, in the case of deer, prevent them from accessing the sites.</p> <p>The potential impact upon the Upper Nene Valley Gravel Pits SPA and RAMSAR site is twofold. There is potential for contamination in the event of a BESS fire and of the loss</p>	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 pollution impacts, is provided in the <b>HRA Revision A [REP1-153]</b> .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>of Functionally Linked Land upon which the birdlife currently depends. Fire in the BESS is addressed elsewhere in this document.</p> <p>The loss of Functionally Linked Land is significant and when dismissing the appeal against the refusal of the Woodford Lodge Farm solar farm (Appeal Ref: APP/M2840/W/24/3354297: Land south of Wood Lodge Farm, Thrapston) it was cited by the Inspector as the overriding consideration in determining his decision to refuse the appeal. The Wood Farm Lodge appeal site is some distance from the SPA but still lay within the foraging area.</p>	
CPRE-028	Cultural Heritage	Conservation character of villages	<p>Because of the distributed nature of the scheme, the conservation villages of Easton Maudit, Grendon and Mears Ashby would find that instead of being surrounded by open countryside, they would be set among significant areas of solar panels. Although the scheme allows a panel-free buffer providing some separation for the villages, in our view it would not prevent a significant and adverse impact upon the setting of these villages because of the remembered</p>	<p>The Scheme design has been established to reduce impacts to the Mears Ashby, Grendon and Easton Maudit Conservation Areas. Attention has also been made to the kinetic experience to heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). As such, the visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in particular, along PROW with historical associations / views between heritage assets. Solar panels have either</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>views of the industrial scale solar panels that would be experienced on the approach to the villages would change the perception of the villages from being attractive villages within the open countryside to being a village set within an industrialised landscape.</p> <p>Easton Maudit would be particularly impacted because it would find itself surrounded by fields of panels on all sides and could only be approached by road or on a PROW by passing alongside or even through fields of industrial scale PV panels. The particular sensitivity of this village and its setting within the open countryside is recognised in Table 4.1 of The Plan for the Borough of Wellingborough9 where Easton Maudit is categorised with the protection status of Restraint Village. This recognises the exceptional sensitivity and value attached to the character of this village. It is easy to envisage this small and tranquil village as a home to a relatively isolated agricultural community in pre-industrial times.</p>	<p>been removed (i.e. Fields EF9, EF16, EF34, FF9, FF13, FF14, FF16 and FF22) or offset (Fields EF5, EF10 to EF15, EF17, EF23 and EF33, FF11, FF15, FF19 and FF26) away from Conversation Areas, and enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Areas.</p> <p><b>ES Chapter 12: Cultural Heritage [APP-049]</b>, supported by <b>ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b>, has identified a moderate adverse effect would occur as a result of the Scheme to the Mears Ashby and Easton Maudit Conservation Areas.</p> <p>The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-029	Transport and Access	Transport Assessment at Link 80 & 81	<p>Most country lanes are well used by walkers, horse riders and cyclists for recreation and exercise. For many equestrian businesses these quiet roads are a vital resource that is essential to their business. Country roads are also used for recreation by walkers, some on a day-to-day basis but also if the PROWs are too muddy. Horse riders, walkers and cyclists using country roads are of High sensitivity.</p> <p>Although we note that some routes are recognised as being close to equestrian facilities, we are concerned that not all connecting rides are accounted for.</p> <p>We are pleased to see that Link 81 has now been recognised as of High sensitivity but note that the applicant disputes the sensitivity of Link 80. We have only found a narrative definition of this link route and there may be confusion over where this route starts. The narrative implies that it starts in Bozeat at the junction with London Road but from the applicant's response it may be that it starts at Access F.2. However this road is</p>	<p><b>ES Chapter 17: Socio -Economics, Tourism and Recreation [APP-054]</b> assessed the potential impacts of the Scheme on the recreational use of highway and public rights of way for pedestrians, cyclists, and equestrian users.</p> <p>Subject to the implementation of mitigation measures set out in the <b>OCTMP Revision A [REP1-145]</b> and <b>OOTMP Revision A [REP1-157]</b>, the Applicant is confident that no significant adverse effects to users are anticipated during the construction or operational phases of the Scheme.</p> <p>Table 13A1.1 <b>Environmental Statement Appendix 13.1 Transport and Access Assessment Tables [APP1-150]</b> Outlines the links and their associated sensitivity. Link 81 reflects the extent of Easton Lane and London Road through Bozeat. link 80 is to the west from the bridge of the A509, reflecting the change in character.</p> <p>It is noted that even if the sensitivity of link 80 was increased, it would not pass the thresholds identified in <b>ES Chapter 13 Transport and Access Revision A [EX2/GH6.2.13_A]</b>.</p> <p>London Road/Easton Lane is on an HGV route and would also potentially be used by some workers to access the sites. <b>ES Chapter 13 Transport and Access</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>currently used by walkers and its sensitivity should reflect that use.</p> <p>In our PIER response we expressed the view that traffic should not pass through villages. At ISH1 the applicant admitted that Access F.2 is connected by an internal track to Access F.3 meaning that it is not necessary to use Link 81. We therefore feel that the use of this High sensitivity route cannot be justified and should be deleted from the scheme.</p>	<p><b>Revision A [EX2/GH6.2.13_A]</b>, assessed a peak of 8 two-way HGV movements per day routing along London Road/Easton Lane, as well as 64 two-way worker movements per day (combination of cars and shuttlebuses)</p> <p>In summary, during the reasonable worst case peak of the construction phase, there would be a limited number of construction vehicle movements routing on London Road/Easton Lane.</p> <p>It is considered that the measures set out in the <b>OCTMP Revision A [REP1-145]</b> would minimise the scope for conflicts between highway users and protect highway safety. The assessment in the <b>ES Chapter 13 Transport and Access Revision A [EX2/GH6.2.13_A]</b> shows that there will be no significant adverse transport effects in Bozeat.</p> <p>As set out in <b>Table 13.10 of the ES Chapter 13 Transport and Access [EX2/GH6.2.13_A]</b>, Access F2 is required for construction and operation of Green Hill F as well as construction of the Cable Route Corridor. The Applicant therefore disagrees that Access F-2 is not necessary.</p>
CPRE-030	Noise and Vibration	Noise monitoring	In our response to the PEIR consultation we raised a number of concerns about the Noise monitoring and the lack of evidence that we	Measurements were taken in general accordance with BS 7445-1:2003 The Description and Measurement of Environmental Noise: Guide to quantities



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			would usually expect. EIA noise studies usually show photographs of the monitoring equipment in situ to demonstrate that it was not located next to extraneous sources of noise such as vegetations or water courses. We are also used to seeing an appendix containing the raw data that was collected correlated against the weather conditions demonstrating that data was excluded when it would be unreliable because of noise created by rainfall or wind affecting the equipment.	and procedures. Weather conditions during the survey period were observed as being dry. Anemometer readings confirmed that noise measurements were undertaken during suitable weather conditions (i.e. no significant rain and medium-low wind speeds i.e. typically <5m/s) during the survey.  Further details of the measurement methodology are presented in Section 14.5 of the <b>Environmental Statement Volume 1, Chapter 14: Noise and Vibration [APP-051]</b> .
CPRE-031	Noise and Vibration	Noise monitoring	We also raised specific concerns about the siting of the "representative" noise monitoring locations at LT23 and LT24 which are by busy A roads unlike the noise sensitive properties that they are supposed to represent. This would have been readily evident had the locations of the monitoring locations been shown on the same figure as the noise sensitive properties as we would normally expect. The background noise levels recorded will not represent the background noise at the properties.  We also questioned the noise modelling using a ground absorption factor of G=0.8 (soft ground). This is	The closest residential properties to each site are defined below along with the approximate minimum distance to the nearest red line boundary (RLB) i.e. the red line boundary of the associated site / cable routing. These receptors are considered to be the most noise sensitive, as effects from the Scheme will be higher at these locations than at receptors located further from the Scheme. Background sound levels measured at the nearby residential properties listed in Tables 14.13 to 14.18 of the <b>Environmental Statement Volume 1, Chapter 14: Noise and Vibration [APP-051]</b> ; are considered to be representative of the background noise environments at other properties in similar nearby locations. On



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			concerning because during summer months and periods of frost the ground will be hard. This is inconsistent with best practise and the Rochdale Envelope approach which would require the lower absorption rate from hard ground conditions to be assessed. We find the applicant's response on this matter in (GH5.8_CR Appendix_Statutory Consultation Section 42 and Section 44 Applicants Response p126) very concerning.	<p>this basis, should the predicted noise levels from the Scheme comply with limits at these assessed residential property receptors, predicted noise levels at receptors further from the Scheme will also comply.</p> <p>It should be noted that constant noise from busy A-roads will have very little influence in the Background, L90, which is defined as the noise level that exceeds for 90% of the measurement period. Consideration of distance from noise sources and residual environment has therefore been taken into account when determining the relationship between the measurement positions and receptor locations.</p> <p>In respect to ground absorption, a factor of G=0.8 (soft ground) is considered reasonable given the ground make-up, texture of the site's vicinity.</p>
CPRE-032	Glint and Glare	PEIR assessment	The concerns that we raised in our PEIR comments about the dangers of glint and glare to equestrians have not been addressed in the response within H5.8_CR_Appendix_Statutory Consultation Section 42 and Section 44 Applicant Responses pages 126-128. While it may be correct to say that riders are receptors who would be tolerant to change, this is certainly not true of horses who are herd	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 <b>ES Chapter 15 Glint and Glare [APP-052]</b> 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



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>animals and are extremely intolerant to any change that they might interpret as a threat.</p> <p>Horses are unpredictable and prone to rear or bolt at the slightest thing. Glint is likely to be the most dangerous of the two hazards but sudden glare when clouds cover parts could also result in a horse bolting and endangering its rider</p>	<p>such, the maximum significance of impact is considered 'minor', which is not significant in EIA terms.</p> <p>Furthermore, The 'Advice on Solar Farms near routes used by equestrians' (The British Horse Society, 2025) states that 'any reflection is unlikely to be a direct problem to horses or equestrians because of the angles and distances involved and because the surface has a dull sheen rather than glare even on a bright day.' It also states that the BHS 'has no evidence of glint and glare from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses.'</p>
CPRE-033	Glint and Glare	PEIR assessment	<p>The response to our PEIR comments also contains the suggestion that "screening is expected to obstruct the line of sight between receptors along public rights of way and bridleways" is disingenuous. A common theme within the DCO is that screening will hide the scheme; this fails to account for the following:</p> <ul style="list-style-type: none"> <li>• screening will not be fully matured for 15 years</li> <li>• after leaf-fall screening is unlikely to prevent views through the screening</li> </ul>	<p>As detailed within <b>ES Chapter 15 Glint and Glare [APP-052]</b>, as well as screening expected to obstruct the line of sight between receptors along public rights of way and bridleways, the typical density of pedestrians and riders is low in a rural environment. There is little safety hazard associated with reflections towards an observer on a footpath or a bridleway, and any resultant effect is much less serious than, for example, on the road network. Furthermore, pedestrians or horses have more freedom to move beyond the solar reflection with little impact upon safety or amenity. As such, a nonsignificant effect is</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>• screening is ineffective in an undulating landscape and</li><li>• there are PROWs where it is proposed not to plant screening.</li></ul> <p>The response to our concern that “Local roads are more likely to have slow moving farm vehicles, cyclists, pedestrians and horse riders that drivers need to avoid and that could result in a collision should a driver be temporarily blinded by glint or glare. They are thus more affected than major roads where traffic conditions are more uniform and predictable” is inadequate. It states that “as per the Highway Code, road users should be prepared for conditions in which glare could be produced”. Rather than simply passing responsibility to drivers, the assessment should acknowledge that an additional and completely new type of hazard would be introduced which should be assessed as increasing the risk.</p>	<p>predicted towards users of public rights of way and bridleways.</p> <p>Whilst it is accepted that impacts may be present along local roads, the reflection intensity for solar panels is similar to common outdoor sources of solar reflection (e.g., still water or car windows). Therefore, solar panel glare is likely to be comparable to that from common outdoor sources whilst navigating the natural and built environment on a regular basis. As such, it is expected that potential impacts of glint and glare is not a new type of hazard for drivers.</p>
CPRE-034	Air Quality	BESS Toxic Fumes	We welcome the change from the PEIR in that that DCO no longer implies that a fire in the BESS would only last for a few hours. However, the only data presented is of one-hour emissions and no consideration is	The <b>OBSSMP Revision A [REP1-143]</b> and <b>ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b> outline how a BESS failure event can be prevented and off-site impacts fully mitigated.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>given to the possibility of a fire that lasts for days. If this occurs during a windless period or a temperature inversion the harmful gasses will not be dispersed by the wind.</p> <p>Although the evacuation of residents is one of the measures that may be necessary in the event of a BESS fire there is no suggestion of how this would be supported for the duration of the fire. Before making the DCO it should be demonstrated that there is a credible evacuation plan detailing how many residents would need to be evacuated and where they could be accommodated.</p> <p>Toxic fumes are not only harmful to humans and there needs to be consideration of how this might affect horses and livestock. Although we very much doubt that the solar farm would to be used to graze sheep, if grazing was to take place, then the sheep would need to be evacuated as well as any horses.</p> <p>It is not safe to rely on a vague list of measures that might be deployed in the event of a BESS fire. There is insufficient detail of the likely scale of the evacuation that might be required</p>	<p>The modelling report assesses the air quality effects of a BESS fire on sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C). Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health.</p> <p>The maximum modelled one-hour mean concentrations over the five modelled years for the worst case BESS fire location for each sensitive receptor are presented in <b>Table 9 of ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b>. Using five years of meteorological data ensures a range of atmospheric stability classes and conditions, such as temperature inversions are considered in the modelling. The concentrations reported therefore represent the highest predicted values under the most adverse meteorological conditions in terms of pollutant dispersion.</p> <p>To account for a longer duration fire, the concentrations presented in presented in <b>Table 9 of ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b> have</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response																																											
			or how it might be achieved. The Emergency Response Plan should be provided and agreed with the local emergency teams before the DCO is made.	<p>been compared against the 8 hour AEGLs (see table below), and this is considered to be a worst-case approach as it assumes that the maximum one-hour mean concentration would be sustained for eight hours, which in reality, is highly unlikely.</p> <table><tr><th rowspan="2">Pollutant</th><th colspan="3">8 Hour AEGL</th></tr><tr><th>Level 1 (ppm)</th><th>Level 2 (ppm)</th><th>Level 3 (ppm)</th></tr><tr><td>CO</td><td>NR</td><td>27</td><td>130</td></tr><tr><td>Formaldehyde</td><td>0.9</td><td>14</td><td>35</td></tr><tr><td>HCl</td><td>1.8</td><td>11</td><td>26</td></tr><tr><td>HCN</td><td>1</td><td>2.5</td><td>6.6</td></tr><tr><td>HF</td><td>1</td><td>12</td><td>22</td></tr><tr><td>NH<sub>3</sub></td><td>30</td><td>110</td><td>390</td></tr><tr><td>NO<sub>2</sub></td><td>0.5</td><td>6.7</td><td>11</td></tr><tr><td colspan="4">8 Hour WEL (mg/m³)</td></tr><tr><td>PM<sub>10</sub></td><td colspan="3">4</td></tr></table> <p>As indicated in <b>Table 9 of ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b>, the predicted maximum one-hour PM<sub>10</sub> concentrations were all well below the eight-hour WEL (4mg/m³) and all other maximum one-hour concentrations</p>	Pollutant	8 Hour AEGL			Level 1 (ppm)	Level 2 (ppm)	Level 3 (ppm)	CO	NR	27	130	Formaldehyde	0.9	14	35	HCl	1.8	11	26	HCN	1	2.5	6.6	HF	1	12	22	NH <sub>3</sub>	30	110	390	NO <sub>2</sub>	0.5	6.7	11	8 Hour WEL (mg/m³)				PM <sub>10</sub>	4		
Pollutant	8 Hour AEGL																																														
	Level 1 (ppm)	Level 2 (ppm)	Level 3 (ppm)																																												
CO	NR	27	130																																												
Formaldehyde	0.9	14	35																																												
HCl	1.8	11	26																																												
HCN	1	2.5	6.6																																												
HF	1	12	22																																												
NH <sub>3</sub>	30	110	390																																												
NO <sub>2</sub>	0.5	6.7	11																																												
8 Hour WEL (mg/m³)																																															
PM <sub>10</sub>	4																																														



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>were below 8-hour AEGL level 2 (irreversible or other serious, long lasting health effects or an impaired ability to escape). In addition, all concentrations were below 8-hour AEGL level 1 with the exception of HF, where there is an exceedance of AEGL level 1 along a Public Right of Way (PROW) (PROW 2) when the BESS fire is located at a point closest to this location (BESS 1). Should a fire occur in close proximity to the PROW, it is unlikely members of the public would be exposed for any significant period of time as it is expected that they would move away from a fire to ensure their safety. As such the effect of BESS fire emissions during the operational phase is predicted to be not significant.</p> <p><b>The OBSSMP Revision A [REP-143]</b> submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard.</p> <p>The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.</p> <p>ERPs can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.</p> <p>Section 5.4.4 of the OBSSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including:</p> <p>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires,</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>impacts on local respondents, impacts on transport infrastructure.”</p> <p>Section 2.4.2 of the OBSSMP stipulates:</p> <p>Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. Northamptonshire Fire &amp; Rescue Service (NFRS) intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP):</p> <ul style="list-style-type: none"><li>• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</li><li>• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				A BESS system and site-specific Emergency Response Plan (ERP) will be developed at the detailed design stage, based on national and international best practice measures. These measures, including the ERP, are included in the Outline BSSMP and the <b>OCEMP Revision A [REP1-131]</b> , is secured in by Requirement 6 and 13 respectively, in Schedule 2 of to the <b>Draft DCO Revision A [REP1-008]</b> .
CPRE-035	Socio-Economics, Tourism and Recreation	Economic Effect of the changes to of PROWs	<p>Although users of PROWs may not pay to use them, they do contribute to the local economy by making use of local hospitality and other services. During construction the PROWs would be subject to disruption and after construction the mitigation would take another 15 years to mature. The industrialisation of the countryside would make it unattractive to use the PROWs and deter visitors. Although we acknowledge that after 15 years the mitigation would be mature, this would only make the scheme less unattractive and not restore the open and expansive views that are the primary attraction for many of the walks in or near to the scheme.</p> <p>We consider that users of the PROWs would be deterred from</p>	<p>The Applicant refers to the response to 'SBMP-010' in the <b>Applicant Responses to Relevant Representation [REP1-161]</b>, which sets out the Applicant's position to the assessment and mitigation measures set in place for PROWs during construction.</p> <p>Furthermore, during the Scheme's operational lifetime, the routing of all existing PROWs is preserved, with additional commitment to providing an enhanced user experience through additional hedgerow screening, planting of tussocky grassland to enhance ecology and biodiversity next to PROWs, and providing upgraded permissive links to increase PROW network connectivity. These measures are secured through the <b>OCEMP Revision A [REP1-137]</b> which itself is secured by Requirement</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			visiting the area and that this would result in an adverse impact upon the local economy.	7 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> .
CPRE-036	Socio-Economics, Tourism and Recreation	Effect on employment	<p>The businesses most at risk from the impacts of the scheme are the agricultural businesses that either directly farm the 3,000 acres that would be taken out of production, downstream or upstream agricultural support businesses and tourist and leisure businesses that depend upon the current pleasant and attractive countryside, PROWs and bridleways and quiet country roads to attract and retain clients.</p> <p>The applicant acknowledges that during construction the majority of the employment would be from inbound contractors and suggests that around 25% could come from the affected communities. We consider that this is optimistic because generally contractors use their own skilled workforces. Regardless, this employment is temporary and is unlikely to have any lasting benefit to the economy of local communities.</p> <p>It is of great concern that Table 17.16: GVA per Annum as a Result of Scheme Construction shows a loss of</p>	<p>The Applicant refers to the response to 'SBMP-009' in the <b>Applicant Responses to Relevant Representation [REP1-161]</b>, which sets out the Applicant's position to the assessment of employment changes – both positive and negative – as a result of the Scheme.</p> <p>The assessment therein estimates construction will create a gross 464 FTE jobs. During operation, a gross total of 15 FTE jobs are anticipated.</p> <p>The Scheme is estimated to result in a long-term loss of 12 agricultural jobs.</p> <p>Opportunities to improve local employment opportunities available through the Scheme, or to provide retraining support for those displaced by the Scheme are set out in the <b>OSSCEP [APP-552]</b>, which is secured by Requirement 20 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			41 FTE jobs in Agriculture and Tourism during construction and Table 17.17: Long-term FTE Employment per Annum as a Result of Scheme Operation shows only 8 FTE jobs during the operational phase.	
CPRE-037	Socio-Economics, Tourism and Recreation	Effect on employment	<p>Although we are far from convinced that as few as 12 direct or indirect FTE jobs would be lost in agriculture, this alone exceeds the number of FTE jobs created during the operational phase of the scheme. We are similarly doubtful that the loss of jobs in Tourism and Leisure would be as low as 29 FTE jobs, but even this figure is significant within a rural economy.</p> <p>The employment figures in Table 17.19: GVA per Annum as a Result of Scheme Operation suggests that the agriculture jobs losses would be a permanent but suggests that tourism would regain 19 of the lost jobs which we do not consider to be credible. The USP for tourist businesses is the attractive countryside that will no longer exist after construction. It is not impossible that a few tourism jobs may return after the construction disruption ceases however, it is highly</p>	<p>The Applicant refers to the response to 'SBMP-009' in the <b>Applicant Responses to Relevant Representation [REP1-161]</b>, which sets out the Applicant's position to the assessment of employment changes – both positive and negative – as a result of the Scheme.</p> <p>The assessed loss of 12 FTE agricultural jobs is based on interviews with the affected farmholdings that the Scheme is located within, and likely indirect effects on suppliers or downstream producers.</p> <p>The loss of 29 FTE jobs dependent on leisure, tourism and visitor spending is likely to be spread across the area affected by the Scheme, and is temporary during the construction period. This is based on estimated impacts on individual tourism and recreation receptors affected by construction traffic, noise, and changes to views. It is considered that these impacts will be greatly reduced during the Scheme's operational lifetime. The assessment of job</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>likely that a significant number of current businesses would not survive the hiatus in their income stream during construction. Some businesses have anyway decided that they would not survive the loss of attractive countryside upon which they market their business because it would render their offer unattractive and announced that they intend to close or relocate out of the area should the DCO be made. Others tourism businesses that try to continue trading would be likely to find that their offer is so diminished that they fail to attract sufficient custom to survive.</p> <p>While we acknowledge that there would be substantial levels of employment created during the construction of the scheme however, this would be temporary in nature and almost irrelevant to the local economy in the proposed 60-year duration of the scheme. On the other hand, the scheme would cause a loss of existing local employment that in rural communities amounts to a significant loss.</p>	<p>losses is considered as a net total across the 2 km Study Area. Therefore, job losses during construction may not necessarily be the same as those 'recovered' during operation. The Applicant recognises the importance of the countryside to local tourism, but highlights the importance of distinct tourism venues within the 2 km Study Area (Sywell Aerodrome, Pitsford Water, the River Nene, and village-centre retail, food, and cultural businesses) that drive tourism-based employment. Given these locations are largely limited in their likely effects during operation, it is considered that visitors to these locations are not anticipated to be continually discouraged from visiting those locations due to the Scheme.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-038	Socio-Economics, Tourism and Recreation	Economic Effect on Local Economy	<p>Table 17.16: GVA per Annum as a Result of Scheme Construction shows an annual loss of £2,153,000 due to impacts on Agriculture and Tourism during construction. We consider this to be largely irreversible as we have argued above. Even if, as suggested by the applicant, 19 of the FTE jobs in tourism would be recreated once construction is complete, this still shows an annual loss of £1,064,000 due to impacts on Agriculture and Tourism.</p> <p>It is suggested that these losses would be offset by ground rent and the employment of 8 direct or indirect FTE jobs to support the scheme. While we agree that the ground rent paid to owner occupier has every chance of entering the local economy, we strongly contest the suggestion that the ground rent paid to absentee landowners would provide a significant benefit the local economy.</p> <p>It is our view that the scheme would result in both a net loss to the local economy and the net loss of local jobs. It is hard to justify the social cost of the net loss of employment when the primary benefit of the scheme</p>	<p>The Applicant confirms that estimated effects on employment and the economic value of the local agriculture and tourism-based economies during the construction and operational phases of the Scheme, are set out in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b>. The Applicant confirms that the impact on agriculture across construction and operation of the Scheme is likely to be mostly consistent, while impacts on tourism are anticipated to be greatest during construction, with employment and economic value likely to recover somewhat once the Scheme is in operation (as assessed).</p> <p>As highlighted, the re-entry of money from ground rent payments into the local economy cannot be guaranteed, and instead are based on likely economic behaviours. For landowners, including those that are not owner-occupiers, the rent that will be paid will provide them with a secure income over the operational life of the Scheme which will be consistent and resilient compared to the yields from crops which can be adversely affected by adverse weather conditions. This therefore provides opportunity for those landowners to re-invest in their remaining landholdings, including through smaller-scale agricultural</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			would accrue to a few largely absentee landowners.	<p>practices like sheep grazing, through which the local agricultural economy is more likely to benefit from over the operational lifetime of the Scheme.</p> <p>The Applicant seeks to highlight that the Scheme also sets out additional enhancement measures to employment and the local skills profile through the <b>OSSCEP [APP-552]</b>. This will bring additional social value from the Scheme that is not directly related to onsite employment and aims to prioritise benefits to persons whose existing employment is affected by the Scheme.</p>
CPRE-039	Human Health	Mental Health and Wellbeing	The Green Hill proposal has already had an adverse impact on the health and wellbeing of the communities that live within or in close proximity to the sites that make up the scheme. They have suffered stress and depression because they are dreading the prospect of what they fear will be forced upon them. The prospect of having to live among a huge construction project for two years followed by living within an industrialised landscape instead of the current rural environment which they treasure is understandably depressing.	<p>Whilst assessment of mental health and wellbeing has not temporally covered the pre-application and DCO process, the Applicant has set out to provide sufficient consultation and information to allow members of affected communities to have access to an accurate description of the likely impacts the Scheme will have upon them, albeit based on the likely worst-case scenarios required to be assessed.</p> <p>With respect to the likely impact of the Scheme on community identity and culture, the Applicant is confident that the assessment of landscape effects, and the resultant low magnitude of impact to health and wellbeing is reasonable. This has been assessed as likely due to extent to which</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			We agree with paragraph 18.8.17 of GH6.2.18. However, while we agree that the impact of the Scheme on community identity and culture and thus on the mental wellbeing of the population is likely to be negative, we do not agree that the impact would be low in magnitude. In part this is because we feel that ES Chapter 8 underrepresents the adverse visual impacts of the scheme but primarily because we understand how important it is to the wellbeing of rural residents that they live within a pleasant rural environment.	the Scheme's construction will change the landscape, the proportion of the community who are likely to feel notably more negatively about their community culture and identity, and the extent to which that would manifest as poorer mental health and wellbeing outcomes. It is acknowledged that this will vary considerably amongst the population based on factors such as age, length of time living in those communities, location and proximity to the Scheme, and level of engagement with community processes. A 'low' magnitude impact has been judged to best represent the effect on the population as a whole, due to the limited change to morbidity and quality of life, and the relatively small proportion of the population likely to be adversely affected (in reference to Table 18.7 in <b>ES Chapter 18: Human Health [APP-055]</b> ).
CPRE-040	Human Health	Being Active in the Open Countryside	The PROWs and rural lanes are a major recreational resource for rural communities. They provide a high quality environment in which to take leisure on foot, on horseback or by cycling. Residents can simply walk or cycle into the countryside from their homes where they can enjoy open countryside views in peace and tranquillity and observe nature. The beneficial health outcomes derived	The Applicant refers to the response to 'SBMP-010' in the <b>Applicant Responses to Relevant Representation [REP1-161]</b> , which sets out the Applicant's position to the assessment and mitigation measures set in place for individual recreation features and facilities impacted by the Scheme.  The assessment undertaken in <b>ES Chapter 18: Human Health [APP-055]</b> considers a wide range of health determinants that consider the mental and



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>from these activities are not the aim of these activities but they are an important by-product of them.</p> <p>The scheme would industrialise significant sections of the well-used local routes by introducing industrial scale solar panels and noise from the electrical infrastructure associated with them. Over time the screening would interrupt the open views that provide highlights of a route and the incentive to use routes would diminish. The net result would be that residents are deterred from taking exercise in the countryside with a consequential adverse impact on their health.</p>	<p>social wellbeing impacts of the Scheme. These include changes to access to open space and leisure spaces (including access to the countryside) for both their mental and physical health and wellbeing benefits. As this is predominantly served by PRowWs, the Applicant has committed to ensure there are disrupted as little as possible during construction and then during the operational phase of the Scheme. These measures are set out in the <b>OPROWPPMP Revision A [REP1-147]</b>, which is secured by Requirement 18 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>. With these mitigation measures in place, and the addition of enhancement measures in the form of permissive paths and ecological planting, it is envisaged that a large proportion of people deterred by construction impacts will be able to find beneficial effects throughout the operational lifetime of the Scheme. As a result, no significant adverse effects to health, wellbeing, and lifestyle from changes to access to the countryside are assessed as likely.</p>
CPRE-041	Agriculture and Soils	Wasteful Use of Agricultural Land	<p>The proposed scheme has a total land take of approximately 3,000 acres of agricultural land of Classes 1 to 3b which the applicant acknowledges that 70.6% of the land</p>	<p>Please refer to response to SGHS-003 in regard to justification of land take in line with the grid connection agreement and NPS EN-3.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>is BMV. The figures in Para 3.10.8 of NPS EN-3 suggest that a 500MW scheme would be expected to require 1,250-2,000 acres of land. It is clear that not only does the scheme fail to avoid BMV land, it also consumes far more land than is considered necessary to achieve 500MW of generation and associated infrastructure.</p> <p>The Sunnica 500MW scheme uses 500 acres less and although the Tillbridge scheme has a similar land take it will generate 700MW or 40% more output. It is clear that the Green Hill scheme does not use the land efficiently.</p> <p>We note that the applicant suggests that this is not significant by expressing the land take as a percentage of the UK's total utilised agricultural land area – a figure that bears no relation to the national resource of arable land let alone BMV.</p>	<p>As set out in <b>Environmental Statement Chapter 5: Alternatives and Design Evolution [APP-042]</b>, under stage 1 of the site selection assessment 'A land area of approximately 100 ha (including solar panels, landscaping and ecology mitigation land) is required to provide a solar scheme of 50MW (AC). To supply the grid connection offer of 500MW (AC), a total site size of approximately 1,000 ha (excluding cable route) is needed. The Applicant sought to find a total site which is around 10% larger than is needed for the grid connection offer. Based on Island Green Power's experience of developing utility scale solar projects, a larger site size provides flexibility for the accommodation of additional mitigation measures and other constraints that may become known through the design development process'.</p>
CPRE-042	Agriculture and Soils	Continuing Agricultural Use	<p>Like all solar farm proposals, the applicant states that the land could remain in agricultural use through grazing. In our experience it is extremely rare for this to take place.</p>	<p>The Applicant does not currently have any grazing arrangements for the Sites yet as given the timescales involved with projects of this type, it wouldn't be practical for grazing licences to be arranged at this point.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>At ISH1 it was clear that the applicant does not have any arrangements in place to guarantee grazing and so under the Rochdale Envelope it must be assumed that grazing would not occur.</p> <p>A significant omission when considering landholding is that it only considers the impact upon the landowner and does not consider the impacts on tenants. Substantial amounts of land are being removed from tenant farms which will significantly impact their business and it is likely that some residual holdings will no longer be viable businesses. This issue should be addressed and the results fed into the socioeconomic impact of the scheme.</p>	<p>Please refer to response to AGR-006 which further considers grazing and agricultural use. The Agricultural Land Use in England at 1 June 2025 statistics (Defra, 25 September 2025) identifies that land used for solar panels also used for grazing in agricultural production was 4,937 ha, up from 3,600 ha in 2024 as reported in the <b>Farming Report [APP-571]</b> at 9.31 (v).</p> <p>The Applicant has considered tenants in the Environmental Statement in <b>ES Chapter 20 Agricultural Circumstances [APP-057]</b> and in <b>ES Chapter 17 Socio economics, Tourism and Recreation [APP-054]</b>.</p>
CPRE-043	Agriculture and Soils	Effect on Soil Condition	<p>The applicant states in 20.8.21 that there is a potential for the soil ALC to be improved as a result of the scheme. This is in stark contrast with the Inspector's and Secretary of State's conclusion in the decision at Blackberry Lane, Pembrokeshire (file ref: DNS/3245065). Paragraph 39 of the SoS decision.</p>	<p>Conversion from arable land to grassland and minimal or non tillage to improve soil organic matter and soil structure therefore soil condition is well proved and documented. Minimal or non tillage is a common practice for sustainable land management in many farming areas/communities geographically.</p> <p>The potential increase of soil organic matter would potentially result in some mineral topsoil becoming organic topsoil. This would</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				potentially lead to an increase of ALC grade according to Agriculture land classification of England and Wales: Revised guidelines and criteria for grading the quality of agricultural land. The potential ALC increase due to organic matter improvement is also related to topsoil texture, wetness class and field capacity days.
CPRE-044	Major Accidents and Disasters	Major BESS Accidents	A BESS fire is the most likely major accident that could occur as a result of the scheme. Although such incidents are uncommon, their likelihood increases in proportion to the number of battery units and the length of time that they are in place. The proposed BESS for Green Hill would be one of the largest in the UK and it is proposed to be in place for 60 years. In combination this makes the probability of a fire far greater than that of smaller sites. There is already one 50MW BESS system in Grendon and permission has been granted for a second one. In total 600MW of storage would be present at Grendon which would mean that the risk of fire would be an order of magnitude greater than at most other sites. A large BESS could even be a target that is vulnerable to bad actors in our uncertain world.	<p>Section 6 of the <b>OBSSMP Revision A [REP-143]</b> outlines a comprehensive list of pre-construction requirements to ensure that BESS failure safety risks are minimised, and hazards fully mitigated.</p> <p>Section 6.1.1 specifies:</p> <p>The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.</p> <p>Section 6.1.3 gives details as to how the Applicant will ensure BESS failure risks are minimised regardless of the number of BESS enclosures required for the Scheme:</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				As stipulated in NFPA 855 (2026), a Failure Modes and Effects Analysis (FMEA) of the BESS (BS EN IEC 60812) or Layer of Protection Analysis (LOPA) of the BESS will be conducted to lay the foundation for predictive maintenance requirements and complement the fault indicator capabilities of the BMS data analytics system. This key analysis minimises the probability of a BESS failure in relation to the specific BESS system and site design and analyses key mitigation solutions to minimise the impact of a BESS failure in the unlikely event that this would occur. These types of risk analysis provide confidence to demonstrate that under day-to-day operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low.
CPRE-045	Major Accidents and Disasters	Toxic Fumes	The DCO contains details of the toxic fumes that would be emitted from a battery fire but given no detail about how these might accumulate or be spread in the course of a fire that would last for days. If a fire was to occur during a temperature inversion	<b>ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b> assesses the air quality effects of a BESS fire on sensitive receptors within a 1 km radius of the potential BESS areas. The maximum modelled one-hour mean concentrations over the five modelled years for the worst case BESS fire location for each sensitive



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response																			
			the fumes would not disperse and could reach high levels of toxicity.	<p>receptor are presented in <b>Table 9 of ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b>. Using five years of meteorological data ensures a range of atmospheric stability classes and conditions, such as temperature inversions are considered in the modelling. The concentrations reported therefore represent the highest predicted values under the most adverse meteorological conditions in terms of pollutant dispersion.</p> <p>To account for a longer duration fire, the concentrations presented in <b>Table 9 of ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b> have been compared against the 8 hour AEGLs (see table below), and this is considered to be a worst-case approach as it assumes that the maximum one-hour mean concentration would be sustained for eight hours, which in reality, is highly unlikely.</p> <table><tr><th rowspan="2">Pollutant</th><th colspan="3">8 Hour AEGL</th></tr><tr><th>Level 1 (ppm)</th><th>Level 2 (ppm)</th><th>Level 3 (ppm)</th></tr><tr><td>CO</td><td>NR</td><td>27</td><td>130</td></tr><tr><td>Formaldehyde</td><td>0.9</td><td>14</td><td>35</td></tr><tr><td>HCl</td><td>1.8</td><td>11</td><td>26</td></tr></table>	Pollutant	8 Hour AEGL			Level 1 (ppm)	Level 2 (ppm)	Level 3 (ppm)	CO	NR	27	130	Formaldehyde	0.9	14	35	HCl	1.8	11	26
Pollutant	8 Hour AEGL																						
	Level 1 (ppm)	Level 2 (ppm)	Level 3 (ppm)																				
CO	NR	27	130																				
Formaldehyde	0.9	14	35																				
HCl	1.8	11	26																				



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response																								
				<table><tr><td>HCN</td><td>1</td><td>2.5</td><td>6.6</td></tr><tr><td>HF</td><td>1</td><td>12</td><td>22</td></tr><tr><td>NH<sub>3</sub></td><td>30</td><td>110</td><td>390</td></tr><tr><td>NO<sub>2</sub></td><td>0.5</td><td>6.7</td><td>11</td></tr><tr><td></td><td colspan="3">8 Hour WEL (mg/m³)</td></tr><tr><td>PM<sub>10</sub></td><td colspan="3">4</td></tr></table> <p>As indicated in <b>Table 9 of ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b>, the predicted maximum one-hour PM<sub>10</sub> concentrations were all well below the eight-hour WEL (4mg/m³) and all other maximum one-hour concentrations were below 8-hour AEGL level 2 (irreversible or other serious, long lasting health effects or an impaired ability to escape). In addition, all concentrations were below 8-hour AEGL level 1 with the exception of HF, where there is an exceedance of AEGL level 1 along a Public Right of Way (PROW) (PROW 2) when the BESS fire is located at a point closest to this location (BESS 1). Should a fire occur in close proximity to the PROW, it is unlikely members of the public would be exposed for any significant period of time as it is expected that they would move away from a fire to ensure their safety. As such the effect</p>	HCN	1	2.5	6.6	HF	1	12	22	NH <sub>3</sub>	30	110	390	NO <sub>2</sub>	0.5	6.7	11		8 Hour WEL (mg/m³)			PM <sub>10</sub>	4		
HCN	1	2.5	6.6																									
HF	1	12	22																									
NH <sub>3</sub>	30	110	390																									
NO <sub>2</sub>	0.5	6.7	11																									
	8 Hour WEL (mg/m³)																											
PM <sub>10</sub>	4																											



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>of BESS fire emissions during the operational phase is predicted to be not significant.</p> <p>The Applicant has committed to only selecting a BESS design that has undertaken Large Scale Fire Testing (LSFT) which demonstrates the impact of a BESS fire when the complete battery system burns out.</p> <p>Section 5.5.9 of the <b>OBSSMP Revision A [REP-143]</b> states:</p> <p>“At the detailed design stage, a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>test data supplied by the BESS system provider.”</p> <p>Volumes of toxic gases and heavy metal particulates that can be emitted during thermal runaway are often partially contained within the BESS enclosure (modules, racks, interior structure of BESS enclosure) and not vented into the external environment. The EPRI white paper “The Evolution of Battery Energy Storage Safety Codes and Standards (2023)” notes: ‘While laboratory testing identifies toxic compounds that are released by burning Li ion batteries, these may be consumed internally, combusted, or may react to form other non-toxic compounds before being released to the environment. In recent events where batteries have burned in this fashion, fire services have announced that nearby air-quality monitoring has shown the air quality to be at safe levels.’</p>
CPRE-046	Major Accidents and Disasters	Firefighting Water Management	Battery fires cannot be extinguished with water and are usually left to burn out. However, in order to prevent contagion to adjacent units, water is used to the cool those units. Fires can last for several days, yet paragraph 5.5.6 of GH7.7_Outline Battery Storage Safety Management Plan provides water usage figures for the volume of water that would be used	A range of recent Large Scale Fire Tests (LSFT) has demonstrated that the typical BESS failure fire event with battery systems at a high State of Charge (SOC), the peak fire conditions have lasted for a period spanning 60-150 minutes. The rest of the testing fire events within the BESS enclosures typically lasted another 6-8 hours at a lower intensity. Because BESS enclosure designs have very high levels of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>over 2 hours. The Liverpool battery fire lasted for nearly 3 days and it essential that the hydrology assessment should be based on the volumes used over at least 72 hours of cooling and not just the 2 hours figures calculated.</p> <p>When considering the Firefighting Consequences, paragraph 5.5.5 acknowledges that surface runoff might contain pollutants. A further concern is that the toxic fumes from a fire could be dissolved out of the atmosphere by rain or spray from the cooling water and it essential that it can be demonstrated that this does not escape the site.</p>	<p>thermal insulation approximately up to 24 hours of smouldering involving non battery combustibles may occur within BESS structure. No intervention is necessary from firefighters in these low intensity burn scenarios.</p> <p>Section 5.3.2 of the <b>OBSSMP Revision A [REP1-143]</b> stipulates that each BESS area will contain 4 hours water supply.</p> <p>If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these "boundary cooling" tactics would likely be applied intermittently in 15-minute application periods with temperature changes measured between application periods.</p> <p>Section 5.3.2 of the OBSSMP also stipulates:</p> <p>If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated, water runoff is likely to contain higher levels of pollutants compared to water used for external boundary cooling of BESS and ESS equipment. All process water used in</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>the system shall be prevented from contaminating potable water sources in accordance with local regulations through the use of check valves or other means as part of the system design. Pollution analysis will be conducted before removing and treating offsite.</p> <p>The two hour figure in paragraph 5.5.6 of the <b>OBSSMP [REP1-143]</b> is the NFCC design inflow used to size the BESS drainage and containment system. It is not the assumed duration of firefighting activity. The firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer and water storage volumes will be in consultation with NFRS.</p> <p>The hydrology assessment does not rely on a two-hour duration. <b>FRA Annex J [APP-108]</b> and the <b>FRA DS Covering Report [APP-097]</b> size containment to the 1 in 200 year plus climate change rainfall event, which is the more demanding scenario. During a fire, the self actuating valves isolate the BESS drainage system, creating a sealed loop that captures all firewater and rainfall for the full duration of the incident.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Water retained within the closed system can also be reused for continued cooling if required by NFRS. As set out in <b>ES Chapter 10 [APP-047]</b>, no runoff is released until tested and either tankered off site or discharged in a controlled manner, ensuring contaminated water cannot escape the site during a prolonged event.</p> <p>Full scale burn testing of BESS systems (2023-2025) and real-world BESS failure events has demonstrated that toxic gas emissions quickly dissipate in close proximity to BESS enclosures, BESS failure incidents in the field have reinforced this proposition. Fire-fighting water from boundary cooling or atmospheric moisture will quickly dilute gases in the smoke plume which will be captured within the BESS area drainage system.</p> <p>The Applicant will only consider BESS systems which have undertaken emission testing under large scale smoke hoods (cone calorimeters) capable to capture every type of battery gas &amp; particle emitted during the thermal runaway process at module, battery rack or complete BESS enclosure level.</p> <p>This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO<sub>2</sub>), Hydrogen (H<sub>2</sub>), Sulphur Dioxide (SO<sub>2</sub>), Nitrogen Oxides (NO<sub>x</sub>), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), PAHs, etc.</p> <p>The equipment also integrates particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc.</p> <p>ERPs drafted at detailed design when the BESS system is selected will consider emissions generated from the specific BESS design and incorporate all requisite site boundary air monitoring protocols and soil sampling requirements to establish levels of gas emissions and metal or plastic byproducts during incident response.</p>
CPRE-047	Major Accidents and Disasters	Emergency Response Plan	There are major concerns and scepticism within the community about how their safety would be assured in the event of battery fires. We feel that it is unacceptable to make the DCO without first having understood and quantified the risks and consequences of a BESS fire and without public scrutiny of the measures proposed to ensure public	<p>Section 5.5.8 of the <b>OBSSMP Revision A [REP-143]</b> documents:</p> <p>The Plume Study contained <b>Chapter 16: Air Quality [APP-053]</b> of the ES (and associated Appendices) assesses the battery fire emission impact in ten worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>safety. A detailed Emergency Response Plan should form a part of the DCO.</p> <p>A specific concern that should be addressed within the Emergency Response Plan is that in order to evacuate the properties at Pastures Farm (the leftmost pin in the picture below) residents and employees would have to drive towards the fire before they can evacuate. How can they safely be evacuated?</p> <p>In conclusion, we do not feel that the DCO satisfactorily considers public safety and that it would not be safe to make the DCO without greater assurance that it can be guaranteed.</p>	<p>The Plume Study considers all toxic emissions at the peak of a BESS fire and Pasture Farm is included as a sensitive receptor, all emissions at this location were below all relevant public health exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out).</p> <p>Section 6.1.8 of the OBSSMP stipulates: Emergency Response Plan(s) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation with NFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community.</p> <p>This is secured through the <b>Draft DCO Revision A [REP1-008]</b>.</p>
CPRE-048	Consultation	Community engagement	<p>We acknowledge that consultations for unwanted development are seldom easy. However, for this scheme we feel that the applicant has given the impression that their only</p>	<p>Please refer to the Applicant's response to comment 'CRNBPC 003' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>interest has been to identify potential issues that could prevent them obtaining consent and how they may be bypassed or avoided. It did not help that in the first consultation meeting that we attended that when an upset member of the community asked why were they proposing to do so much harm to their community and way of life, the applicant responded by saying bluntly it was because the planning system would allow them to do so.</p> <p>This lack of engagement is also frequently evident in the applicant's responses to consultees in the Consultee Response tables (GH5.x_CR_Appendix xxx) where concerns are not addressed in a considered response but are either merely "Noted" or brushed aside with a statement like: "The Applicant acknowledges these comments but remains confident in the level of consultation undertaken and information presented throughout the targeted consultation, as described in the Consultation Report [EN010170/APP/GH5.1]."</p>	<p>The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented.</p> <p>The Applicant notes <b>Adequacy of Consultation Responses [AoC-001 to AoC-015]</b> where local authority consultees provided their feedback on the adequacy of the consultation.</p> <p>The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-049	Consultation	Accessibility of information	<p>We appreciate that the scheme is of a size and scale that exceeds anything that even CPRE Northamptonshire has previously encountered. However, it has felt throughout that information has either been presented in an unnecessarily disjointed and inaccessible manner or in some cases information is simply not supplied. A consequence of the disjointed documentation is that individual documents are littered with long cross-references which make them much more difficult to read.</p> <p>At ISH1 we were relieved that the consultant acting for SGHS had also found that the disjointed presentation of the LVIA documentation made it very difficult to work with and requested that that applicant should supply an index to help navigate the large volumes of separate documents. We soundly endorsed their request and are pleased to see that the Examining Authority has recently followed this up with the applicant. However, we are very disappointed that to date the applicant has only offered an online orientation meeting on 10th November to guide us through the</p>	<p>Please refer to the Applicant's response to comment 'CRNBPC 003' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>.</p> <p>The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented.</p> <p>An indexed copy of the detailed LVIA assessment has been provided at Deadline 1 <b>[REP1-041]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			information. This is after Deadline 1 which means that was of no help in the preparation of this written representation.	
CPRE-050	Community Benefits	Community Fund	It is proposed that the issue of a community fund should be addressed separately to the DCO. We feel that this is unacceptable because we are aware of cases where promised community funding is lost when schemes change ownership. Any community funding arrangement must be guaranteed and the legal duty to provide such funding must transfer to any and every future operator of the scheme.	The Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of the <b>Planning Statement Revision A [EX2/GH7.15_A]</b> ). This fund will be available for important causes in the local area. During the development of the proposals for Green Hill Solar Farm, we have consulted on community benefits and, based on feedback, will determine how best to distribute funding. The Scheme will also generate business rates that are paid to the local authority. No further details were given as a part of the Application because it will not be taken into account in the planning balance.
CPRE-051	General Matters	Guaranteeing Decommissioning and Repowering Funding	There is a significant risk that the scheme will not be decommissioned by the operator at the end of its permission and that it will not even be repowered. Although the DCO will contain a legal requirement for the scheme to be decommissioned, this only guarantees that decommissioning will take place if the final owner has sufficient funds to do so. Unless funds have been accumulated within a ring-fenced	Please refer to the Applicant's response to comment 'NNC-085' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> in regard to commitments secured for decommissioning. In respect of decommissioning, Requirement 21 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>bond or account during the operational life of the scheme, then the final owner of the scheme can simply declare bankruptcy and abandon the scheme.</p> <p>It is also possible, if not probable, that the scheme will not be repowered. There is no guarantee that by the time of repowering, the return on the investment of repowering costs would be sufficient to justify the required investment. It is thus necessary to ensure that decommissioning funds are accumulated prior to the scheduled repowering.</p> <p>It is also important to include a Requirement for the scheme or any parts of the scheme to be decommissioned within 6 months of it not being operable or of not being repowered when necessary. In the absence of such a Requirement it would be possible that an obsolete or inoperable scheme could be abandoned until the end of the permission and the land not returned to a useful purpose</p>	<p>Requirement 21 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> requires that the detailed decommissioning plan must include a timetable for its implementation. The date of decommissioning is itself calculated from the date that the relevant part of the Scheme permanently ceases to generate electricity on a commercial basis. It is not considered appropriate to require that decommissioning is carried out within a certain time period, but instead an appropriate time period, having regard to the applicable legislation and policy at that time, must be included within the detailed decommissioning plan. The decommissioning plan must be implemented as approved. A failure to comply with the Requirement is a criminal offence, ensuring that the Scheme will be decommissioned appropriately at the end of its life.</p>



## 4.2 National Grid Electricity Distribution (East Midlands) plc

Table 4.2: [REP1-302](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NGED-001	General matters	Introduction	<p>We act on behalf of National Grid Electricity Distribution (East Midlands) plc ("NGED").</p> <p>NGED remains the licensed distribution network operator under Section 6 Electricity Act 1989 (the "EA 1989") for the area in which the Green Hill Solar Farm Development Consent Order 202[X] (the "Order") is proposed to have effect and which was submitted by Green Hill Solar Farm Limited (the "Applicant").</p> <p>We understand that the deadline for submitting comments on relevant representations closed on 7 November 2025 (the "Deadline"), and that the project is currently at the examination stage.</p> <p>NGED regrettably did not have the opportunity to submit a relevant representation before the Deadline. The developer successfully contacted our client on 07 November 2025 and we were swiftly appointed to act on NGED's behalf in relation to the Order. As you can appreciate, this was after the Deadline and in light of this, we wanted to confirm NGED's position regarding the project. This is set out below.</p>	<p>The Applicant notes this comment and confirms that notice that the Scheme had been accepted was sent to NGED. Contact was made with NGED as no relevant representation was made. The Applicant notes that the Examining Authority has accepted NGED's request to be added as an interested party, and confirms that it is discussing appropriate protective provisions for NGED to be included within the <b>Draft DCO Revision A [REP1-008]</b>.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NGED-002	Development Consent Order	Protective Provisions	The application includes land in or upon which NGED may have assets and which may include (but are not limited to) high voltage electricity cables. NGED is currently reviewing the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are affected. While NGED will continue to seek to have positive engagement with the Applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under the EA 1989. This includes ensuring acceptable terms of any proposed protective provisions.	The comment is noted. The Applicant is in discussions with NGED's solicitors to agree the protective provisions to be included within the <b>Draft DCO Revision A [REP1-008]</b> .
NGED-003	General matters	Conclusions	NGED therefore kindly requests that the Planning Inspector accepts their apologies for submitting this letter after the deadline, but requests that their discretion is exercised to accept this letter and for it to be considered as a holding objection to the application until an asset protection arrangement has been agreed between the parties. No formal agreement has yet been concluded and accordingly we are writing this letter to protect NGED's position pending conclusion of an appropriate agreement. Once NGED is satisfied that its network is protected, we will confirm this with the Planning Inspectorate.	The Applicant notes this comment and will continue to work with NGED proactively.



### 4.3 UK Health Security Agency

**Table 4.3:** [REP1-183](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
UKHSA-001	Human Health	General matters	<p>Thank you for your letter of 28 October 2025 inviting the UK Health Security Agency (UKHSA) to provide comments on questions relating to the above Nationally Significant Infrastructure Project (NSIP). Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We have no comments to provide at this stage and we note that we have replied to earlier consultations, as listed below, and this response should be read in conjunction with that earlier correspondence:</p> <p>Request for Scoping Opinion</p> <p>Public Consultation: Section 42 19/08/2024 03/01/2025</p>	The Applicant notes this comment.



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

### 5.1 Bozeat Parish Council

**Table 5.1: REP1-184**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BPC-001	General Matters	Overall comments	<p>I am Chairman of Bozeat Parish Council and its Planning Spokesperson. I am also in the unusual position of representing CPRE Northamptonshire with regard to this scheme. We are mindful that the Examining Authority would not gain anything if we were to repeat the issues and arguments raised in the CPRE Northamptonshire representation and so we have confined this representation to issues that particularly pertain to Bozeat Parish and its residents. However, this representation should be read bearing in mind the contents of the CPRE Northamptonshire representation. Although we have not carried out a formal survey, we listen to our residents and the universal</p>	<p>The Applicant notes the comment and has responded in detail to the matters raised under References BPC-002 to BPC-011.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>opinion expressed is that they do not support the scheme and are depressed by the way it would be so detrimental to Bozeat and its surroundings. During the earlier stages of the process we even had a notorious parish council meeting where we were harangued by a resident for not taking sufficient action to prevent the scheme.</p> <p>The particular concerns of the residents of Bozeat are:</p> <ul style="list-style-type: none"><li>• The proposed route through the village for construction traffic</li><li>• The changes to the character of the landscape</li><li>• The impact users of PROWs and country lanes</li><li>• The risk of toxic fumes and/or rain resulting from a battery fire</li><li>• Impact on wildlife</li><li>• Highways damage</li></ul>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>Congestion and safety on the A509</li></ul>	
BPC-002	Transport and Access	Traffic Routing	<p>There is great concern, if not anger, that there is a plan to provide a route for construction traffic through the village (Link 81). We raised this issue in our response to the PEIR consultation to which the applicant responded: "The access is required to ensure access to all sections of Green Hill F". However, at ISH1 the applicant conceded that there would be an on-site access track connecting Access F.2 with Access F.3 and that Link 81 is not necessary in order to construct the scheme, it is merely more convenient for traffic to do so.</p> <p>The Parish Council strongly objects to this route and request that it is deleted from the scheme. We would also request that signage and ANPR monitoring should be required to prevent construction traffic accessing the scheme through Bozeat.</p>	<p>As set out in Table 13.10 of the <b>ES Chapter 13 Transport and Access [EX2/GH6.2.13_A]</b>, Access F2 is required for construction and operation of Green Hill F as well as construction of the Cable Route Corridor. The Applicant therefore disagrees that Access F-2 is not necessary.</p> <p>As set out in <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> in response to Q20.0.9, during the reasonable worst case peak of the construction phase, there would be a limited number of construction vehicle movements routing on London Road/Easton Lane in Bozeat. It is considered that the measures set out in the <b>OCTMP Revision A [REP1-145]</b> would minimise the scope for conflicts between highway users and protect highway safety. The assessment in the <b>ES Chapter 13 Transport and Access [APP-050]</b> shows that there will be no significant adverse transport effects in Bozeat.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BPC-003	Landscape and Visual Socio-Economics	Views Impact on village life	<p>Bozeat is a village of about 1,000 homes that sits in open countryside. It is a quiet village set to the east of the A509 and its rural nature is reinforced by the way that the countryside occasionally leaks into the village. Our residents highly value our rural setting and the PROWs and quiet country lanes on their doorstep which they use for walking, cycling and horse riding.</p> <p>Although the A509 provides direct access to neighbouring villages and towns, residents often choose to use the country lanes that enter the village through Easton Maudit when travelling locally so that they can enjoy the countryside as they go about their daily lives.</p> <p>The scheme would constitute a profound detrimental change to the countryside within which residents live, work and take our leisure. The village would no longer feel that it is a quiet</p>	<p>The LVIA acknowledges that locally prior to the establishment of the Embedded Mitigation, there would be an immediate change to the character of the individual Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, these effects would be limited to the site itself and its immediate setting. As planting matures it would begin to provide enclosure to the individual Sites, screening and providing containment to the Scheme allowing it to become more absorbed into the receiving landscape. However, given the scale of the proposals, there would be an appreciation of the Scheme within its immediate surroundings which would be notably different from the character of the surrounding arable countryside.</p> <p>With respect to impacts on local community, particularly in respect to community identity and culture, and the way communities perceive and engage with their surroundings, it is acknowledged that there will be a long-term impact during the Scheme's lifetime. Changes in community perceptions of the Scheme will be gradual and reliant on landscape and ecological mitigation maturing, and use of PROW and permissive routes onsite becoming more widespread. As such, this is why the assessment of impacts on community identity and culture in ES Chapter 18: Human Health [APP-055] has identified a two-stage assessment outcome for the operational phase of the Scheme: a temporary medium- to long-term minor adverse effect initially,</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>rural village but one that it is surrounded by solar farms.</p> <p>Whether they travel north, south or west out of the village they would have to pass through or by fields of industrial scale solar panels which would feel oppressive.</p>	<p>before reducing to a long term minor/negligible adverse effect in the areas most directly affected.</p>
BPC-004	Landscape and Visual Impact	Mitigation	<p>We note that there is much focus in the DCO on how screening would mitigate the impacts of the scheme and it is suggested that it would be beneficial. While we acknowledge that screening would reduce the views of the industrial nature of the scheme when it eventually reaches maturity, we would view it as only trying to mask the adverse impact of the scheme and an unnatural feature in a largely open landscape that offers expansive views as illustrated in the photographs below.</p> <p>We also wish to highlight that screening takes many years to mature and during that time the community would be</p>	<p>The LVIA recognises that the proposed new landscape mitigation measures will take time to establish as set out within para 8.8.12 to 8.8.15 of the <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b>.</p> <p>A future year of 2044 (15 years post first operation of the Scheme) is considered for the <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> and supporting appendices i.e., 15 years after commissioning, which is the typical period for the maturation of landscape planting. However, in reality mitigation would begin to take effect in advance of this point. For example, the OLEMP requires that the existing hedgerows are 'grown out' to a target height of 4m – 4.5m. Growth rates are estimated to be 0.4m a year, and depending on the existing height of the hedgerows, could take considerably less than 15 years to reach this desired height.</p> <p>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</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			expected to live in an industrial landscape for a significant portion of their lives.	<p>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.</p> <p>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]. This includes measures for the formative pruning and ongoing long term management of proposed and existing hedgerows, trees and woodland within the Scheme.</p> <p>The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the <b>Draft DCO Revision A [REP1-008]</b>.</p>
BPC-005	Socio-Economics & Recreation	Public Rights of Way	Residents consider themselves lucky to have direct access to the countryside. They are able to walk or cycle from their homes to PROWs and quiet country lanes which makes them more likely to do so. Circular walks are particularly popular, one of which is the western circular walk shown on the map. This passes through Horn Wood	Impacts on PROWs and recreational routes are set out in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its appendix ( <b>Revision A</b> ) [REP1-079]. This assesses the impact on the useability and user experience of each PROW likely to be affected by the Scheme individually at the construction, operation, replacement, and decommissioning phases of the Scheme. This assessment includes consideration of long-and short-range views, vegetation and planting proposals, noise, glint and glare, and perception of safety. Whilst it is understood there will be some





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			and Easton Maudit and would pass through the scheme. Cycling is popular along the network of country lanes with most routes leaving the village on Easton Lane to connect to other country lanes. Cyclists would not only encounter the scheme as they pass through the components of Site F, but would also encounter other sites on their wider route. Walkers also use the country roads with the return trip to Easton Maudit being a common trip. Although it is seldom mentioned, the tranquillity of the countryside is an important factor in the enjoyment of a walk or ride. Even if the panels could be visually screened, the noise created by the equipment on the site would constitute an unwelcome intrusion into the experience of those passing the scheme.	level of adverse effect to PROWs and the recreational use of highways, it is not considered that these effects are significant at any stage of the Scheme, subject to implementation of mitigation in accordance with the Requirements.
BPC-006	Air Quality	BESS	There are concerns about the potential for an accumulation of toxic fumes to reach the village in the event of a BESS	The <b>OBSSMP Revision A [REP1-143]</b> and <b>ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b> outline how a BESS failure event can be prevented and off-site impacts fully mitigated.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response											
			fire. Because it takes days for a battery fire to burn out there should be an assessment of how the toxic fumes might accumulate in the atmosphere and how they may be brought to land by rainfall. The Air Quality assessment does not consider the impact of a typical battery fire which lasts for days not hours.	<p>The modelling report assesses the environmental impact of a BESS thermal runaway incident on sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health.</p> <p>The maximum modelled one-hour mean concentrations over the five modelled years for the worst case BESS fire location for each sensitive receptor are presented in Table 9 of <b>ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b>. To account for a longer duration fire, these have been compared against the 8 hour Acute Exposure Guideline Levels (see table below), and this is considered to be a worst-case approach as it assumes that the maximum one-hour mean concentration would be sustained for eight hours, which in reality is highly unlikely.</p> <table><tr><th rowspan="2">Pollutant</th><th colspan="3">8 Hour AEGL</th></tr><tr><th>Level 1 (ppm)</th><th>Level 2 (ppm)</th><th>Level 3 (ppm)</th></tr><tr><td>CO</td><td>NR</td><td>27</td><td>130</td></tr></table>	Pollutant	8 Hour AEGL			Level 1 (ppm)	Level 2 (ppm)	Level 3 (ppm)	CO	NR	27	130
Pollutant	8 Hour AEGL														
	Level 1 (ppm)	Level 2 (ppm)	Level 3 (ppm)												
CO	NR	27	130												



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response			
				Formaldehyde	0.9	14	35
				HCl	1.8	11	26
				HCN	1	2.5	6.6
				HF	1	12	22
				NH <sub>3</sub>	30	110	390
				NO <sub>2</sub>	0.5	6.7	11
				8 Hour WEL (mg/m <sup>3</sup> )			
				PM <sub>10</sub>	4		
				<p>As indicated in Table 9 of <b>ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b>, the predicted maximum one-hour PM10 concentrations were all well below the eight-hour WEL (4mg/m3) and all other maximum one-hour concentrations were below 8-hour AEGL level 2 (irreversible or other serious, long lasting health effects or an impaired ability to escape). In addition, all concentrations were below 8-hour AEGL level 1 with the exception of HF, where there is an exceedance of AEGL level 1 along a Public Right of Way (PROW) (PROW 2) when the BESS fire is located at a point closest to this location (BESS 1). Should a fire occur in close proximity to the PROW, it is unlikely members of the public would be exposed for any significant period of time as it is expected that they would move away from a fire to ensure their safety. As such the effect of BESS fire emissions during the operational phase is predicted</p>			



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>to be not significant.</p> <p>The <b>OBSSMP Revision A [REP1-143]</b> submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard.</p> <p>The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.</p> <p>Emergency Response Plans (ERPs) can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Section 5.4.4 of the OBSSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including:</p> <p>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</p> <p>Section 2.4.2 of the OBSSMP stipulates:</p> <p>Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. Northamptonshire Fire &amp; Rescue Service (NFRS) intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP):</p> <ul style="list-style-type: none"><li>• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<ul style="list-style-type: none"><li>• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.</li></ul> <p>A BESS system and site-specific Emergency Response Plan (ERP) will be developed at the detailed design stage, based on national and international best practice measures. These measures, including the ERP, are included in the <b>OBSSMP</b> and the <b>OCEMP Revision A [REP1-131]</b>, is secured in by Requirement 6 and 13 respectively, in Schedule 2 of to the <b>Draft DCO Revision A [REP1-008]</b>.</p>
BPC-007	Ecology and Biodiversity	Construction and Decommissioning	One of the greatest pleasures while walking the PROWs is to see the wildlife and listen to the birdsong. During construction, repowering and decommissioning there would be substantial disturbance to the habitats of wildlife for a prolonged period. We are concerned that this would cause the loss of the habitat that the local wildlife depends upon. Even during the operational period, the change of use of the land would change the species that can be supported by it and the loss of species that rely on foraging on cultivated farmland. A	Impacts on ecology and biodiversity are discussed in detail within the Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-033]. This assesses impacts at all stages of the Scheme. A detailed response in regard to deer is provided in Please refer to the Applicant's response to comment 'FC-008' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			particular concern is that the movement of deer whose sighting is a highlight of a walk will be prevented by the deer fencing.	
BPC-008	Transport and Access	Damage to highway network	The scale of construction on both the main road network and the local country roads would inevitably result in wear and damage of the roads. We would wish to ensure that the cost of repairs does not fall on local residents, but should be covered by the applicant. We request that road condition surveys are carried out prior to any construction activity and then after construction is complete and the applicant is made responsible for the costs of returning the roads to the condition that they were in prior to construction.	Section 5.2 of the <b>OCTMP Revision A [REP1-145]</b> sets out the approach to road condition surveys and rectifying any highway defects attributable to the construction activities.
BPC-009	Transport and Access	Congestion	The A509 is an undulating road that is busy during commuting times. Whenever there are roadworks that introduce single lane operation, they are usually accompanied by accidents and even fatalities. We note	Access F-1 is an existing access on the A509 and is a wide priority junction with a right ghost turn island. As set out in Drawing 23061-KMC-XX-AF1-DR-CH-0001_C in Appendix C of the <b>Transport Assessment [APP-151]</b> , there are no proposed improvements to this access. Access F-3 is an existing priority junction access on the A509. As set out in Drawing 23061-KMC-XX-AF3-DR-CH-0001_C



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			that the scheme proposes to use existing accesses but if works would be necessary to make them fit for use by the construction traffic any single lane operation should be required to avoid commuting hours unless it is not possible to do so.	<p>included in Appendix C of the Transport Assessment [APP-151], the existing access is capable of safely accommodating HGV movements but would need to be widened on the southern kerb to facilitate cable drum deliveries.</p> <p>Access CR24 is an existing field access, which will require to be upgraded to a construction access for the Cable Route Corridor. The proposed improvements are shown in Drawing 23061-KMC-XX-CR24-DR-CH-0001_C of Appendix C of the <b>ES Appendix 13.2 Transport Assessment Part 2 of 3 [APP-152]</b>.</p> <p>The upgrade of these two accesses on the A509 would require temporary traffic management, which would be submitted to the local highway authority for approval as part of any application for a road space permit as set out under Article 9 'Application of Permit Schemes' in the <b>Draft DCO Revision A [REP1-008]</b>. The traffic management would need to accord with Chapter 8 of the Department of Transport's Traffic Signs Manual. The local highway authority, who manages the network, would be able to place any reasonable conditions on the road space permit to minimise the disruption of the works. This may include traffic management not being on the network during peak hours.</p>
BPC-010	Consultation	Adequacy of consultation	Bozeat has used every opportunity to engage with the consultation offered prior to the DCO being submitted. We	<p>The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. <b>Consultation Report Revision A [REP1-017]</b></p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			have sought to influence the design of the scheme and the evidence that is presented in the DCO. We do not feel that we have been able to influence the design or obtain additional information and were given a response to our request to remove Link 81 from the scheme that has proven to be incorrect.	<p>details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development.</p> <p>The early engagement during the non statutory consultation phase is summarised in Chapter 4 of the Consultation Report Revision A [REP1-017].</p> <p>A summary of comments made by Bozeat Parish Council in response to statutory consultation and targeted consultation for the Scheme is provided in Appendix 5.8 of the <b>Consultation Report [APP-031]</b> and Appendix 5.12 of the <b>Consultation Report [APP-035]</b>.</p> <p>The Applicant notes <b>Adequacy of Consultation Responses [AoC 001 – AoC- 015]</b> where consultees provided feedback on the adequacy of the consultation. The Applicant notes the Decision to Accept Application [PD-003] by the Planning Inspectorate as an indication that sufficient consultation was undertaken.</p> <p>Please also refer to reference BPC-002 which confirms the need to utilise Link 81 to access Green Hill F by Access F-2 for the purposes of construction, the cable route corridor, operation and decommissioning.</p>
BPC-011	General Matters	Conclusions	The Parish Council concludes that the scheme would have a significant detrimental impact upon Bozeat and its residents.	<p>The Applicant has responded to these points in the above comments BPC-002 to BPC-010.</p> <p>The Applicant notes that National Policy Statement EN-1 confirms in paragraphs 3.2.6 to 3.2.8 that the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>It would cause a fundamental change to the landscape that is so important to residents and significantly harm the environment in which residents live, work and enjoy their leisure.</p> <p>We strongly object to the proposal to route all forms of construction traffic through our village and because this has proved not to be necessary, we firmly request that Link 81 is deleted from the scheme and measures used to prevent construction traffic from passing through the village.</p> <p>We are just one of many villages that would be badly impacted by the scheme and we would not be the worst affected. In combination we consider that the total harms to so many communities would be unacceptable and would be greater for other the NSIP schemes that have been approved. This scheme would set a new low for the</p>	<p>Secretary of State should assess all applications for renewable energy infrastructure on the basis that there is an urgent need for this infrastructure, and that the specific contribution of an individual project does not need to be established. Paragraph 2.3.9 of NPS EN-3 further acknowledges that because renewable energy resources can only be developed where the resource exists, and because there is no limit on the need established in NPS EN-1, a consecutive approach should not be used in considering applications for renewable energy projects.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>consideration given to rural communities.</p> <p>The planning data within the CPRE representation shows that we are fast approaching the targets for solar PV schemes and so we do not feel that even the pressure of targets can be deployed to excuse the harms of the scheme.</p> <p>Although the Parish Council support action to address climate change, we consider that the level of harms that communities are being asked to accept to allow the scheme are not justified and the scheme should not be granted permission.</p>	



## 5.2 Easton Maudit Parish Meeting

**Table 5.2: REP1-186**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EMPM-001	Historic Environment Landscape and Visual Impact Socio-Economics	Height of panels Views of village and church Public Rights of Way	<p>Easton Maudit is a small 'Conservation' village of historic importance, with an outstanding Grade 1 church constructed in 1320 which is surrounded by undulating crop-bearing agricultural land and whose landscape setting is defined by tree groups, treed hedgerows, and hedgerows bisecting the open countryside, public highways and rights of way.</p> <p>The principal concern of the villagers is the proposal to surround the village with arrays of 4.5 metre high PV 'tracking' solar panels, which will effectively destroy the appearance, character and amenity of the village itself not merely for the villagers but also those members of the public who choose to seek recreation and training while walking its footpaths now and for generations to come. As a result, none of the multitude of footpaths will retain views of the churches and familiar countryside landmarks over their whole length as their views will be replaced on one side (or both sides) of each path by a black curtain of 4.5 metre high PV Panels which will obliterate all normal views.</p>	<p>As assessed in <b>ES Chapter 12 Cultural Heritage [APP-049]</b>, a moderate adverse residual effect was identified to Easton Maudit Conservation Area and Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784). The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels.</p> <p>The assessment in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b> has assessed Easton Maudit as a local tourism receptor and its surrounding network of PROWs as recreation receptors. The assessment identifies that the construction of the Scheme is likely to generate a residual long-term minor adverse effect on the tourism value of the conservation area due to near views of the Scheme in Green Hil F, while some individual PROWs are anticipated to experience up to moderate-minor adverse effects where they closely</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>interact with the Scheme. Whilst these recognise a change to the appreciation of the village from recreation routes, these are not significant effects.</p> <p><b>The ES Chapter 8 Landscape and Visual Impact [APP-045]</b> 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 the mitigation planting has become established. The effect is reduced to not significant from Year 15 of operation. The LVIA acknowledges that locally prior to the establishment of the Embedded Mitigation, there would be an immediate change to the character of the individual Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, these effects would be limited to the site itself and its immediate setting. As planting matures it would begin to provide enclosure to the individual Sites, screening and providing containment to the Scheme allowing it to become more absorbed into the receiving landscape. However, given</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>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.</p> <p>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.</p> <p>The iterative design of the Scheme has utilised a series of buffers that have been embedded into the design which are outlined in Table 8.8 of the <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b>. These buffers have been embedded into the design of the Scheme and are embedded into the Landscape and Ecology Mitigation Plans. The Landscape and Ecology Mitigation Plan for Site F</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				(Revision A) <b>[REP1-113, REP1-115]</b> has been designed to retain open views of the surrounding churches at Easton Maudit, Grendon and Bozeat as well as avoidance of panels within large areas of Site F, with these areas coming forward as areas for ecological mitigation. The Avoidance of panels within fields closest to Easton Maudit within fields FF16, FF13 and FF14 help provide separation from the village and the array maintaining the immediate rural hinterland to the village.
EMPM-002	Glint and Glare Socio-Economics	Glint and Glare Public Rights of Way	An additional feature of the panels is that they will be prone to 'glint and glare' which will negatively impact not only their amenity to walkers but also to riders and their horses, seeking to enjoy the views from bridleways: and this is likely to diminish the attractiveness of rides and diminish the financial viability of the Stables in the village.	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 <b>ES Chapter 15 Glint and Glare [APP-052]</b> 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.  Glint and glare from panels are likely only to be experienced around sunrise and sunset, when the incident angle of sunlight is low enough to 'skim' the surface of the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>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 <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b>, no significant adverse effects are anticipated. In particular, the British Horse Society recognises that glint and glare does not have any detrimental effect on horses or equestrian users of PROWs.</p> <p>The British Horse Society 'Advice on Solar farms near routes used by equestrians' is included under Appendix of the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-162]</b>.</p>
EMPM-003	Landscape and Visual Impact	Planning Policy	Importantly, the damage that the Applicant proposes to inflict on the historic landscape surrounding Easton Maudit appears to be inflicted in wholesale disregard of Policy 3 of the North Northamptonshire Core Strategy 2011 – 2031 which is as follows: "Development should be located and designed in a way that is sensitive to its landscape setting, retaining and, where possible, enhancing the distinctive qualities of the landscape character area which it	<p>The Applicant notes this comment.</p> <p>Please refer to the response to EMPM-004 of the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in regard to the scheme design, mitigation and visual considerations.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>would affect. Development should: a) Conserve and, where possible, enhance the character and qualities of the local landscape through appropriate design and management. b) Make provision for the retention and, where possible, enhancement of features of landscape importance. c) Safeguard and, where possible, enhance important views and vistas including sky lines within the development layout. d) Protect the landscape setting and contribute to maintaining the individual and distinct character and separate identities of settlements by preventing coalescence.</p> <p>.....</p> <p>As well as the damage to the Easton Maudit landscape, the villagers deplore the aggregate damage to the landscape over the whole Green Hill Project.</p>	
EMPM-004	Agriculture and Soils	Site Selection	<p>In addition, the villagers do not agree that the use of BMV agricultural land for the proposal is justifiable. The Applicant has obviously made no attempt to seek out and use land of lower quality, quite the contrary; it has deliberately sought to attract owners and/or tenants of good quality farming land. It clearly does not care about food security for the UK. Moreover, the Applicant has made no attempt to justify its use of 1,200 hectares</p>	<p>Please refer to the Applicant's response to comment 'EMPM-006' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> and the response to SGHS-003, below.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			of predominantly BMV land to generate “up to” 500 MW of electricity: the proposed “land take” is substantially in excess of the land normally required for the generation of 500 MW of electricity.	
EMPM-005	Transport and Access	Traffic routing Consultation	The villagers will be greatly discomfited by the noise and traffic congestion generated during the construction period by the considerable amounts of construction necessary. As regards the so-called ‘Targeted Consultation’ they require proper justification of the late decision by the Applicant to add a request to enlarge the scope of the land required for the scheme in order to control (in a wholly unparticularised manner) the highways specified including, in particular, one segment over Easton Way between the west door of the church and the end of that road, a road that the Applicant had regularly assured residents would not be used for access to the site. The ExA should firmly insist that the Applicant must give careful justification for their attempt to seize control of this additional plot of the highway for their convenience and for the inconvenience of the villagers.	Please refer to the Applicant’s response to comment ‘EMPM-007’ in <b>The Applicant’s Response to Relevant Representations [REP1-161]</b> .
EMPM-006	BESS Ground Conditions	BESS Safety	The second great concern of the villagers is the proposal to install a substantial quantity of storage batteries in the BESS	Please refer to the Applicant’s response to comment ‘EMPM-009’ in <b>The Applicant’s</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Ecology and Biodiversity		<p>areas in neighbouring Grendon and in the Green Hill C sector.</p> <p>The villagers note that the Applicant has at every stage during both the informal and statutory consultations failed in its obligation to give appropriate information about the widely acknowledged acceptance amongst the scientific and industrial community of the fact that Lithium-ion batteries are at risk of thermal runaway and self-combustion due to a variety of circumstances including manufacturing defects, impact during handling and immersion. It is well known now that battery fires are notoriously difficult to extinguish and there is a risk of contamination and pollution of, inter alia, waterways and the River Nene and the Ramsar protected areas. Even now the villagers wish to investigate why the Applicant has persisted in giving so little information about the source and number of batteries which they propose to use and the risks to the community from their use.</p> <p>What is more, it is now absolutely clear from the learned paper entitled 'Hazardous Substances potentially generated in "loss of control" accidents in Li-ion Battery Energy Storage Systems (BESS); storage capacities implying Hazardous Substances Consent obligations' by Eurlng Dr Edmund</p>	<p><b>Response to Relevant Representations [REP1-161].</b></p> <p>The <b>OBSSMP Revision A [REP1-143]</b> submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard.</p> <p>The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.</p> <p>Section 5.5.9 of the <b>OBSSMP Revision A [REP1-143]</b> states:</p> <p>At the detailed design stage, a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Fordham and Professor Sir David Melville that the storage capacities of the BESS installations in the present case are such that they are likely to impose on the Applicant the obligation to apply for Hazardous Substances Consent from the HSE and/or local planning authority. It is believed that it has not sought to do so. Nor has it complied with the requirement imposed by NPS EN-1 which confirms at 4.12.1 that "All establishments wishing to hold stocks of certain hazardous substances above a threshold need Hazardous Substances consent. Applicants should consult the HSE at pre-application stage if the project is likely to need hazardous substances consent. ...."</p>	<p>sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.</p> <p>Volumes of toxic gases and heavy metal particulates that can be emitted during thermal runaway are often partially contained within the BESS enclosure (modules, racks, interior structure of BESS enclosure) and not vented into the external environment. The EPRI white paper "The Evolution of Battery Energy Storage Safety Codes and Standards (2023)" notes: 'While laboratory testing identifies toxic compounds that are released by burning Li ion batteries, these may be consumed internally, combusted, or may react to form other non-toxic compounds before being released to the environment. In recent</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>events where batteries have burned in this fashion, fire services have announced that nearby air-quality monitoring has shown the air quality to be at safe levels.'</p> <p>Section 5.5.8 of the OBSSMP documents:</p> <p>The Plume Study contained <b>Chapter 16: Air Quality [APP-053]</b> of the ES (and associated Appendices) assesses the battery fire emission impact in ten worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area.</p> <p>The Plume Study considers all toxic emissions at the peak of a BESS fire, all emissions at receptor locations were below all relevant public health exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out).</p>
EMPM-007	Other Environmental Matters	Waste	If the Applicant is granted a DCO, the Villagers wish the Secretary of State to ensure that any Order is made conditionally on terms that the Applicant remains responsible for the disposal of all waste materials whenever arising, whether at the end of the proposed 60 year term or on any earlier date when the scheme becomes obsolete and financially unviable.	Please refer to the Applicant's response to comment 'EMPM-010' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b> .



### 5.3 Grendon Parish Council

**Table 5.3: REP1-187**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
GrPC-001	General Matters	Overall	This report is submitted on behalf of Grendon Parish Council as supplementary evidence to the oral statement delivered by Councillor Philip Mason at the Preliminary Meeting on 22 October 2025. It focuses on three interlinked issues: 1. Flood risk associated with land use changes from solar and Battery Energy Storage System (BESS) developments. 2. Traffic impacts and pedestrian safety within the village, particularly near Grendon CE Primary School. 3. Effects on Public Rights of Way (PROWs) and access to local amenities. While the Council supports renewable energy in principle, the current application fails to demonstrate that risks relating to flooding, drainage, community safety, and access have been properly mitigated or evidenced.	The Applicant notes this comment.
GrPC-002	General Matters	Overall	<p>The proposed Green Hill Solar Farm and BESS are sited on historically active floodplain land within the Bozeat and Easton Maudit catchment. This area drains into Grendon Brook, which feeds the River Nene and subsequently the Summer Leys SSSI, SPA, and RAMSAR sites.</p> <p>The site overlaps agricultural fields that play an essential role in natural water</p>	The Applicant has carried out hydraulic modelling for the Grendon Brook, River Nene and Field Drain to confirm that the BESS will be located in an area safe from flooding. Please refer to the Applicant's response to HYD-001, EA018 and EA-019 of the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>storage and runoff attenuation. Conversion of these fields into a solar array and access corridors— especially where drainage and compaction are altered—could intensify downstream flood risk in Grendon village.</p> <p>The village's Main Road and Manor Road form the principal pedestrian routes to Grendon CE Primary School. These are narrow lanes with no dedicated pavements. At school drop off and pick-up times, they become single track and congested. Any increase in heavy traffic, including HGV movements, along these routes presents a serious safety hazard.</p> <p>Furthermore, the proposed construction works intersect the Waendal Walk route, a nationally recognised event attracting over 3,000 visitors annually, as well as the much-used local walking link to Castle Ashby, the only accessible shop by foot for residents. Closure or obstruction of these routes will materially impact community wellbeing and local commerce.</p>	<p>Please refer to response to HYD-003 in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in regard to pollution prevention measures for the BESS.</p> <p>Please refer to response to SGHS-010 in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in regard to runoff attenuation.</p> <p>Please refer to the response to Q20.0.4 in the <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> with regard to Grendon CE Primary School.</p> <p>Please refer to the Applicant's response to the International Waendal Walk on page 43 in the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-162]</b></p>
GrPC-003	Agriculture and Soils  Hydrology and Flood Risk	Battery Safety	<p>The applicant's assertion that conversion of arable fields to grass under the solar arrays will reduce flood risk is not supported by evidence. Grass cover may improve infiltration under optimal conditions, but these benefits are lost when soils are compacted by heavy machinery or overlaid</p>	<p>The consultee's comments do not reflect the national policy position for solar PV or the hydrological behaviour of the agricultural baseline. NPS EN-3 is explicit at paragraph 3.10.75 that where a Flood Risk Assessment is undertaken, "as solar PV panels will drain to the existing ground, the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>with impermeable access tracks. No modelling has been provided to quantify these factors. Given that the proposed BESS units are located within a floodplain area (Zones 2 &amp; 3), this raises additional safety concerns. Lithium-based systems are highly sensitive to moisture ingress and can pose serious risks of fire or explosion in flood conditions. The applicant's Operational Battery Management Safety Plan (OBMSP) does not adequately address emergency response measures in the event of inundation or water ingress. The Council's flood evidence demonstrates that these risks are not theoretical but recurring realities in the Grendon catchment. Given the water table and run off drainage of this location goes into Grendon Brook (directly feeding into the Nene and Northamptonshire's drinking water) any moisture ingress/fire hazards has the capacity to poison Northamptonshire potable water.</p>	<p>impact will not, in general, be significant". This reflects the established evidence base that solar arrays installed over a maintained vegetated surface do not materially alter infiltration or runoff. The Cook and McCuen study supports this, showing that with a maintained grass sward beneath the panels, changes in runoff volume and peak discharge are typically less than one percent compared with the pre-panel condition. Increased runoff occurred only where bare ground or gravel was present, which does not form part of this Scheme.</p> <p>The agricultural baseline already exhibits year-round compaction and reduced infiltration. Routine arable operations including ploughing, drilling, spraying and harvesting create compacted layers and tramlines that persist for most of the year. These compacted strips act as preferential flow paths and reduce infiltration even when crops are present. Annual cultivation produces shallow rooting and lowers soil organic matter, resulting in weak soil structure and high sediment mobility during rainfall. <b>ES Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023 to REP1-023]</b> identifies these baseline hydrological constraints.</p> <p>The post-construction condition beneath the arrays is more stable. The land is reinstated</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>to a permanent grass sward with deeper and more continuous root structure, providing more consistent infiltration than the intensively cultivated baseline. The <b>OSMP [APP-550]</b> secures the measures that prevent long term compaction, including dry-weather soil handling, avoiding trafficking on unstripped topsoil, separation and protection of soil horizons, low ground pressure plant, controlled stockpiling and reinstatement to restore soil structure. Aftercare ensures the restored soils regain the required condition.</p> <p>No gravel or hard surfacing is proposed beneath the panels. Access tracks are permeable and distributed, avoiding the concentrated compaction associated with agricultural tramlines. As a result, the solar areas retain their ability to infiltrate rainfall and behave hydrologically as permeable greenfield land. The Scheme does not require engineered attenuation for the panelled areas, which is consistent with EN-3 paragraph 3.10.75 and with the evidence base for solar developments over grass.</p> <p>Runoff controls in the <b>Flood Risk Assessment and Drainage Strategy Report [REP1-053]</b> apply to the non-panelled areas associated with infrastructure. These controls ensure that the wider Scheme does not increase off-site</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>flows, in line with NPS EN-1. The panelled areas themselves do not introduce impermeable surfaces and do not require attenuation beyond the maintenance of a stable grass surface.</p> <p>Taken together, NPS EN-3, the Cook and McCuen evidence and the embedded soil protection measures confirm that the solar array areas do not increase flood risk and are an improvement on the intensively managed agricultural baseline. The assessment remains robust.</p> <p>The statement that the BESS lies within Flood Zones 2 and 3 is incorrect. The Environment Agency Flood Map for Planning is an indicative national screening tool and does not define site specific flood extents. For Green Hill, detailed hydraulic modelling has been completed for the Grendon Brook catchment, as set out in <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b>. This modelling supersedes the national mapping and shows that the BESS compound is wholly within Flood Zone 1, above the 1 percent annual probability event with climate change, and outside both defended and undefended modelled extents. This was the basis for locating all substations and the BESS in Flood Zone 1 through the Sequential Test. The site specific modelling</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>does not identify any flood pathway that would affect the BESS compound during the design event.</p> <p>Paragraphs 4.1.24 - 4.1.29 of the <b>OBSSMP Revision A [REP1-143]</b> cover key BESS enclosure design feature including Ingress Protection (IP) ratings. At the detailed design stage, the Applicant will only select a BESS design with an appropriate IP rating for the Green Hill BESS and Green Hill C Bess sites.</p>
GrPC-004	Hydrology and Flood Risk	Flooding	<p>The village has experienced multiple major flood events:</p> <ul style="list-style-type: none"><li>• July 2012: Severe flooding across Main Road and Easton Way, confirmed by Northamptonshire County Council Flood Investigation Report (FIR). Properties recorded internal flooding up to 0.6m.</li><li>• March 2016: Surface water from agricultural fields north of the village overtopped drainage ditches, inundating several gardens and the lower end of Main Road.</li><li>• December 2020: Prolonged rainfall caused Grendon Brook to overtop, closing Main Road for over 12 hours.</li></ul>	<p>The Applicant recognises that Grendon has experienced recorded flooding from Grendon Brook, its tributaries and localised surface water routes. These events are documented by the Lead Local Flood Authority and form part of the established baseline.</p> <p>The historic flooding in Grendon is acknowledged and is already documented by the Lead Local Flood Authority. These events arise from local drainage constraints and overtopping of Grendon Brook within the village. They are downstream of the Order Limits and occur independently of the land proposed for development.</p> <p>The <b>FRADS Report [REP1-053]</b> demonstrates that the Scheme does not alter the drainage catchment to Grendon or introduce any new pathways for flow. The</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"> <li>December 2023 (Christmas Day): Flooding affected more than ten households; emergency sandbag deployment was required.</li> <li>September 2024: Heavy rainfall led to 12 homes suffering internal flooding, two still uninhabitable months later. Main Road was impassable for over 24 hours.</li> </ul> <p>Each event has been formally logged with the North Northamptonshire Flood and Water Management Team and referenced in the Council's Local Flood Report (2024). These recurring events demonstrate the system's existing fragility and limited drainage capacity.</p> <p>The proposed development footprint lies upstream of these impacted areas. Without detailed, site-specific 2D hydrological modelling that includes infiltration loss due to compaction and cumulative surface runoff, the risk of downstream flooding cannot be considered mitigated.</p>	<p>Site continues to drain through the existing agricultural ditch network, the land beneath the panels remains permeable, and runoff from associated infrastructure is restricted to greenfield rates. Construction controls manage any temporary risk of compaction.</p> <p>On this basis, while the historic flooding records are noted as baseline context, the FRA confirms that the development will not increase runoff to Grendon or exacerbate existing flooding.</p>
GrPC-005	Transport and Access	HGV routing	Main Road and Manor Road are narrow, pedestrian-shared routes used by families walking to the village school. Construction traffic associated with the solar farm and BESS installation will introduce additional HGV movements, particularly problematic during school peak hours (08:30–09:30 and	Please refer to the response to Q20.0.4 in the <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> with regard to Grendon CE Primary School. Please also refer to <b>8.2.1 Transport and Access Routes Supporting Document [REP1-167]</b> which confirms the defined



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			15:00–16:00). In a recent traffic survey, October 2025, conducted by Northamptonshire Police there were already 142 HGV's in a 7 day period recorded travelling through the village, and this will only increase exponentially if the solar farm goes ahead. No provision has been made for temporary traffic management or safe pedestrian diversion. Without these, the development poses an unacceptable risk to vulnerable users.	construction HGV routes that will be used, as secured by the <b>OCTMP Revision A [REP1-146]</b> and Requirement 15 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> .
GrPC-006	Transport and Access Socio-economics	Public Rights of Way	<p>The development proposes changes to public rights of way and to the route of the Weandal Walk between the villages and through the site.</p> <ul style="list-style-type: none"> <li>Solar panel corridors are planned to run close to or across the footpath, potentially replacing open access with fencing or 4.5 m high hedging, which would reduce visibility, degrade amenity and discourage walking with prams/push-chairs or small children. Now, they have stated, they will temporarily close some and reroute others.</li> <li>Pedestrian connectivity is a key community asset; any rerouting or enclosure must not reduce safety, accessibility or enjoyment of the</li> </ul>	<p>Direct impacts on PRowWs have been assessed in <b>ES Chapter 17: Socio Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b>. These identify that no residual significant adverse effect to PRowWs is anticipated at any phase of the Scheme, subject to implementation of mitigation and enhancement measures.</p> <p>During construction, the routing of PRowWs within the Order Limits are to be protected and kept open wherever feasible and safe to do so. Any closures or diversions, such as for cable laying and landscape planting will be temporary in nature, with sufficient prior notice given of closures, and diversion routes clearly signposted. These measures are set out in the <b>OPROWPPMP Revision A [REP1-147]</b>, which is secured by</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>route. The Council requests clarity on how the applicant will maintain safe, direct, well-signed footpaths accessible to all.</p> <ul style="list-style-type: none"><li>• The scheme will be disruptive and not enhance the openness of the long established local footpaths linking Easton Maudit, Yardley Hastings and Cogenhoe. Many of these are part of the annually held international Waendal Walk which attracts around 3,000 visitors per year supporting local businesses. Industrial fencing and closures would break the route and damage local commerce and tourism.</li><li>• Grendon has our own footpath warden as the area around the villages has an extensive network of PROW's. The warden holds organised walks twice per month all year round, which encourages people to get out and about and supports positive mental health. This was never more important and apparent than during the pandemic.</li><li>• The proposed closure of our walking route to Castle Ashby during the 2 year construction —</li></ul>	<p>Requirement 18 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>With specific regards to the International Waendal Walk, please refer to the <b>Applicant's Response to ExA First Written Questions Q19.0.1-19.0.3 [REP1-163]</b>. The Applicant has furthermore been in direct contact with Wellingborough Town Council as the event organisers to ensure protective mitigation measures during construction are satisfactorily agreed. These are secured through the <b>OCEMP Revision A [REP1-131]</b> by Requirement 13 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the most used link to a village shop and local amenities — means residents from both villages who currently walk there and back will be forced to travel by car instead. (And the road routes will both be subject to traffic management measures). There is no alternative shop within comfortable walking distance. The closure threatens to increase car usage significantly and remove a vital non motorised access for everyone.	
GrPC-007	Environmental Statement	Cumulative	The Green Hill Solar Farm proposal cannot be viewed in isolation. Several other solar and BESS projects are proposed or consented within a 10-mile radius, including sites at Easton Maudit, Yardley Hastings, and Bozeat. The cumulative effect of these on hydrology, road use, and visual amenity is significant. The combined increase in impermeable areas, vehicular traffic, and battery installations within a shared catchment amplifies the risk of runoff concentration and surface water flooding. Yet, the applicant's Environmental Statement assesses cumulative effects only for solar arrays, not for BESS systems. This omission undermines the integrity of the impact assessment.	<p>Please refer to the Applicant's response to comment 'GrPC-007' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>.</p> <p>The cumulative effects are summarised in <b>ES Chapter 25: Cumulative Effects and Effects Interactions [APP-062]</b>, where other developments are considered, based on <b>ES Appendix 25.2: Short List of Committed Developments [APP-189]</b>, the content of which was agreed with local authorities.</p> <p>Cumulative effects assessments for each topic are set out in Chapter 25 and include the assessment of the impacts of the Scheme and the short list of committed</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>developments. This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice on Cumulative Effects Assessment (September 2024). The mitigation measures set out across the ES therefore account for anticipated cumulative effects. The consideration of effect interactions follows the methodology outlined in <b>ES Chapter 2: EIA Process and Methodology [APP-039]</b>.</p> <p>The cumulative assessment has considered BESS projects for cumulative effects.</p>
GrPC-008	Development Consent Order	Compulsory Purchase	<p>The Council notes with concern that a local farmer within Grendon parish has been asked to surrender rights or face potential Compulsory Purchase Orders (CPOs) for cable connection works, despite these fields lying within our parish boundary. Any such action must be clearly justified, transparently documented and subject to parish consultation.</p>	<p>The Applicant is seeking to enter into agreements with landowners for the rights required for the Scheme. However, should this not be possible, the <b>Draft DCO Revision A [REP1-008]</b> does include compulsory acquisition powers to ensure that the Applicant can obtain the rights required to implement the Scheme. Compensation will be available in the event compulsory acquisition powers are used. The <b>Statement of Reasons [APP-019]</b> sets out the reasons why compulsory acquisition powers are required and why they are justified to ensure this critical national priority infrastructure can be implemented.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
GrPC-009	Major accidents and disasters	BESS safety	<p>The proposed Green Hill Solar (GHS) BESS, when considered alongside the existing 49.99 MW installation and the recently approved 49.99 MW BESS adjacent to it, represents one of the largest cumulative BESS clusters in the country. All three are positioned in close proximity to Grendon village, particularly the residential area around Main Road and the homes near the parish boundary in property 708 Station Road, and the neighbouring properties. This cumulative configuration presents a significant public safety risk, particularly because:</p> <ul style="list-style-type: none"><li>• The installations sit on floodplain land, where inundation could compromise electrical isolation and battery integrity.</li><li>• In the event of a thermal runaway or fire, toxic gases such as hydrogen fluoride, carbon monoxide, and dioxins could be released. These gases are acutely hazardous and could travel significant distances under prevailing wind conditions.</li><li>• The applicant's Operational Battery Management Safety Plan (OBMSP) fails to provide an adequate emergency response framework, instead advising residents to remain</li></ul>	<p><b>The OBSSMP Revision A [REP1-143]</b> submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard.</p> <p>The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.</p> <p>Section 5.5.9 of the <b>OBSSMP Revision A [REP1-143]</b> states:</p> <p>At the detailed design stage, a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>indoors. Given the density of nearby housing, this is unrealistic and likely to cause unacceptable danger to life.</p> <ul style="list-style-type: none"><li>• There is no coordination plan between the three BESS operators to manage cross site fire response, containment or emergency evacuation.</li><li>• In its Relevant Representation (13 August 2025) NGET emphasises that its existing and planned infrastructure is located within or adjacent to the Order Limits of GHSF, and that inadequate protective provisions pose a risk to statutory access, maintenance and future development (including the WMEL 400 kV overhead line project) of national significance. This is a clear example of a cumulative infrastructure burden: not simply the effect of GHSF in isolation, but the combined impact of GHSF + future national grid works in the same corridor. The Parish Council therefore considers the combined BESS developments at Green Hill to represent an unacceptable cumulative hazard, exacerbated by their floodplain</li></ul>	<p>must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.</p> <p>Volumes of toxic gases and heavy metal particulates that can be emitted during thermal runaway are often partially contained within the BESS enclosure (modules, racks, interior structure of BESS enclosure) and not vented into the external environment. The EPRI white paper "The Evolution of Battery Energy Storage Safety Codes and Standards (2023)" notes: 'While laboratory testing identifies toxic compounds that are released by burning Li ion batteries, these may be consumed internally, combusted, or may react to form other non-toxic compounds before being released to the environment. In recent events where batteries have burned in this fashion, fire services have announced that</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			location, lack of integrated fire strategy and absence of meaningful engagement with local emergency services.	<p>nearby air-quality monitoring has shown the air quality to be at safe levels.'</p> <p>Section 5.5.8 of the OBSSMP documents finds of the Plume Study commissioned to validate BESS site locations:</p> <p>The Plume Study contained <b>ES Chapter 16: Air Quality [APP-053]</b> of the ES (and associated Appendices) assesses the battery fire emission impact in ten worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area.</p> <p>The Plume Study considers all toxic emissions at the peak of a BESS fire, all emissions at receptor locations were below all relevant public health exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out).</p> <p>Examples of potential ERP protocols contained in Sections 5.5.10 – 5.5.13 in the OBSSMP are examples taken from the Plume Study report which are appropriate for the very low emission levels modelled at sensitive receptor locations.</p> <p>ERPs can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.</p> <p>Section 5.4.4 of the OBSSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including:</p> <p>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</p> <p>Section 6.1.8 of the OBSSMP stipulates:</p> <p>Emergency Response Plan(s) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation NFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>affect site operatives, first responders, and the local community.</p> <p>This is secured through the DCO by Requirement 6 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>A cumulative effects assessment has been prepared for the Application within the Environmental Statement <b>[APP 038 to APP-064]</b>. Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see <b>ES Chapter 2: EIA Process and Methodology [APP-039]</b>. This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p>
GrPC-010	Major accidents and disasters	BESS safety Cumulative	<p>The Council requests that the Examining Authority require:</p> <ol style="list-style-type: none"><li>1. A full cumulative risk assessment covering fire, toxicity and flood interaction across all three BESS sites.</li><li>2. Publication of a joint emergency response plan involving Northamptonshire Fire and Rescue Service, North</li></ol>	<p>Section 3 of the <b>OBSSMP Revision A [REP1-143]</b> documents the detailed consultation between the Applicant and Northamptonshire Fire &amp; Rescue Service (NFRS).</p> <p>The Applicant has ensured site design is fully compliant with National Fire Chiefs Council (NFCC) guidance and has worked closely with NFRS to address some site</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Northamptonshire Council and the Parish Council which confirms detailed plans of actions to extinguish fires in the event of a blaze/explosion.</p> <p>3. Assurance that the sites will include adequate fire breaks, containment bunding, and on-site firefighting water supply capable of managing multi-site incidents.</p> <p>4. Consideration of the proximity to residential areas and potential need for community evacuation planning under worst-case scenarios.</p>	<p>specific operational and access requirements for NFRS.</p> <p>Section 5 of the OBSSMP covers all requisite firefighting considerations including, fire breaks, firefighting water containment, firefighting water supply requirements, all aspects of Emergency Planning including ERP and RM plans, and summaries of Plume Study consequence modelling to validate BESS site locations.</p> <p>The Applicant's response to <b>GrPC-09</b> above comprehensively covers Emergency Response Planning and details how the Applicant has met all requirements in the drafting of the OBSSMP and the process for establishing detailed ERPs at the detailed design stage to fully address emergency procedures for all credible hazards and risks.</p> <p>The Applicant and NFRS have signed a Statement of Common Ground (SOCG) <b>[EX2/GH8.3.8]</b>, which is submitted at Deadline 2, demonstrates that the Applicant has followed all key BESS safety guidance and has fully assessed fire, explosion, toxic emission, and flood risks. The SOCG confirms the Applicant commits to the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>prioritising the following four key safety areas identified by NFRS:</p> <ol style="list-style-type: none"><li>1. National Fire Chiefs Council (NFCC) Guidance for design of Battery Energy Storage System (BESS) sites</li><li>2. BESS Safety Standard commitments for the Scheme.</li><li>3. BESS area firefighting provisions and expectations for NFRS involvement.</li><li>4. NFRS site access and operational control requirements</li></ol> <p>Applicant actions to address requirements:</p> <ol style="list-style-type: none"><li>1. The Applicant confirms that NFCC guidance was a fundamental safety precept for the preliminary BESS site design. NFCC guidance is comprehensively referenced in the Outline Battery Storage Safety Management Plan (OBSSMP), and the BESS Fire Emissions Modelling Report (Appendix 16.2) fully aligns with the latest NFCC Plume Study scope recommendations. NFCC Guidance will continue to be a key safety component for the full lifecycle of the scheme.</li></ol>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>2. The Applicant confirms that minimum safety requirements in the OBSSMP and secured through the DCO follow key recommendations outlined in National Fire Protection Association (NFPA) 855: Standard for the Installation of Stationary Energy Storage Systems and European Association for Storage of Energy (EASE) Guidelines on Safety Best Practices for Battery Energy Storage Systems.</p> <p>The Applicant confirms that BESS system selected at the detailed design stage in addition to completing UL 9540A unit and / or installation level testing, will have undertaken Large Scale Fire Testing (LSFT) to validate minimum equipment spacing distances, this has become a mandatory requirement in the NFPA 855 (2026).</p> <ul style="list-style-type: none"><li>• Further detail on safe BESS design commitments can be found in the OBSSMP section 4.1.</li><li>• Further detail on BESS detection and suppression system commitments can be found in the OBSSMP section 4.1.29.</li></ul>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<ul style="list-style-type: none"><li>• Further detail on safe BESS explosion prevention and protection commitments can be found in the OBSSMP section 4.1.30.</li><li>• Further detail on safe BESS control and monitoring system commitments can be found in the OBSSMP section 4.3.2.</li><li>• Further detail on Pre-Construction Information Requirements can be found in the OBSSMP section 6. These requirements cover the range of risk assessment and consequence modelling tools that will be used to fully validate the final BESS site design.</li></ul> <p>3. At the detailed design stage, the Applicant will select a BESS design that has undertaken Large Scale Fire Testing (LSFT) which will validate minimum equipment spacing distances, demonstrating that a BESS fire will not propagate to adjacent BESS enclosures and does not require boundary cooling intervention from firefighters.</p> <ul style="list-style-type: none"><li>• The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>conditions to establish final equipment spacing distances for the Scheme.</p> <ul style="list-style-type: none"><li>• The Applicant confirms that in line with NFCC and NFPA 855 guidance that in all BESS failure scenarios NFRS are only expected to take a defensive firefighting strategy i.e. observation and only applying boundary cooling if necessary. The BESS area water supply system for NFRS allows for ease of access in all weather conditions and ensures that firefighters do not have to operate within a smoke plume.</li><li>• Further detail on BESS detection and suppression system commitments can be found in the OBSSMP section 4.1.29.</li><li>• Further detail on BESS site fire water provision commitments can be found in the OBSSMP section 5.3.</li><li>• Further detail on BESS site emergency planning commitments (including NFRS site familiarisation and training) can be found in the OBSSMP section 5.4.</li><li>• The Applicant confirms that at the detailed design stage, smoke plume</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>impacts on Grendon National Grid Station will be fully risk assessed. This will be addressed through BESS LSFT data or through parallel emission testing integrating Fourier Transform Infrared Spectroscopy (FTIR) &amp; X-ray Fluorescence (XRF) analysis to define gas emission and particulate matter composition of a full burn of the battery system. This would be one of the risk assessments / consequence modelling reports at detailed design to demonstrate that there are no significant offsite impacts from a BESS failure event.</p> <p>4. The Applicant has worked with NFRS to ensure that emergency access routes are appropriate for NFRS appliances to operate in all weather conditions. Access roads will be maintained to ensure vegetation does not impede vehicle access.</p> <ul style="list-style-type: none"><li>• The Applicant has agreed appropriate vehicle passing places with NFRS on all BESS area access roads.</li><li>• The Applicant confirms that at the detailed design stage NFRS welfare</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				areas and incident observation areas for the BESS areas will be fully agreed and accommodated for the scheme.
GrPC-011	General matters	Overall	<p>Grendon Parish Council respectfully requests that the Examining Authority:</p> <ol style="list-style-type: none"><li>1. Rejects unsubstantiated claims that grassland conversion reduces flood risk without site-specific modelling.</li><li>2. Requires a revised Flood Risk Assessment with full 2D hydrological modelling, infiltration testing and assessment of BESS flood resilience.</li><li>3. Requires a full cumulative fire and toxicity risk assessment across all adjacent BESS installations (the existing, approved, and proposed 49.99 MW sites), considering their shared floodplain location and proximity to residential areas.</li><li>4. Mandates a joint emergency response, fire extinguishing and evacuation plan to be coordinated with Northamptonshire Fire and Rescue Service, North Northamptonshire Council and Grendon Parish Council, ensuring adequate firebreaks, containment bunding and community safety measures.</li><li>5. Mandates a Surface Water Management Plan with measurable runoff targets,</li></ol>	The Applicant has addressed these points in comment above ' <b>GrPC-001 to GrPC-010</b> '.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>vegetation management details, and post-construction monitoring.</p> <p>6. Confirms that the applicant must demonstrate no net increase in runoff for the 1-in 100-year event (plus climate change) with any residual risk borne by the developer.</p> <p>7. Requires a Traffic and Construction Management Plan with defined HGV routes avoiding Main Road/Manor Road and measures to safeguard school pedestrians.</p> <p>8. Demands a Public Rights of Way and Access Statement ensuring all paths, including the Waendel Walk and Castle Ashby route, remain safe and open, with well signed alternatives if closures are unavoidable.</p> <p>9. Requests clarification on land rights and CPO proposals affecting parish farmland, ensuring all decisions respect parish boundaries and landholder consent.</p> <p>10. Calls for a Post-Installation Review after one full winter season to evaluate flood, traffic, and safety outcomes, with enforceable remediation requirements.</p>	
GrPC-012	General matters	Overall	Grendon village remains acutely vulnerable to flooding, and the proposed development lies on land proven to contribute to that risk. Without comprehensive hydrological	The Applicant has addressed these points in comment above ' <b>GrPC-001 to GrPC-010</b> '.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			assessment, drainage planning, and flood-resilient BESS design, the proposal cannot be deemed safe. Furthermore, the cumulative strain of construction traffic, PROW disruption and the potential compulsory use of parish land represent unacceptable risks to residents' safety and amenity. The Parish Council urges the Examining Authority to withhold consent until these matters are addressed with evidence-based mitigation and full community consultation.	



## 5.4 Lavendon Parish Council

**Table 5.4: REP1-188**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LaPC-001	General Matters	Consultation to date	<p>Since the proposals relating to the Green Hill Solar Farm NSIP were made public, Lavendon Parish Council (the 'Council') has followed developments closely and has engaged actively in reviewing the documentation concerning 'Site G'. From the outset, the Council's position has been to engage constructively with Island Green Power (the 'Developer'), sharing local knowledge on several key matters and conveying the community's concerns, with the aim of influencing the design process to achieve outcomes beneficial to both the local community and the natural environment.</p> <p>The Council submitted a formal response to the public consultation in December 2024. This response sought clarification on specific aspects of the proposals' design, outlined the wider concerns of the local community (principally relating to visual, ecological and flood risk impacts) and requested the removal of two fields from the scheme, identified as 'GF9' and 'GF13'.</p> <p>In August 2025, the Council submitted its first 'relevant representation' via the dedicated Planning Inspectorate (PINS) portal, reiterating the points raised during the earlier consultation. At that stage, the Developer had</p>	<p>The early engagement during the non statutory consultation phase is summarised in Chapter 4 of the <b>Consultation Report Revision A [REP1-017]</b>.</p> <p>A summary of comments made by Lavendon Parish Council in response to statutory consultation and targeted consultation for the Scheme is provided in Appendix 5.8 of the <b>Consultation Report [APP-031]</b> and Appendix 5.12 of the <b>Consultation Report [APP-035]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>not provided substantive responses to the matters raised.</p> <p>To seek further clarity and provide parishioners with an informed update, a meeting between two Council representatives and the Developer was held on 24 September 2025. The meeting was attended by representatives of the Developer and by consultants from several technical disciplines who had contributed to the suite of assessments supporting the Development Consent Order (DCO) application, including visual impact, flood risk and ecology.</p> <p>During the meeting, the Council representatives sought an update on the request for the removal of fields GF9 and GF13 from the scheme. The Developer advised that this would not be possible, citing the project's designation as Critical National Priority (CNP) infrastructure necessary to meet the UK's urgent energy objectives. Quoting from an official statement: 'Removing land parcels from the Scheme will reduce the expected annual generation of the Scheme. Although the carbon reduction, energy security and affordability benefits associated with the Scheme would remain significant, they would not be as large as they would be if delivered with land parcels removed'.</p>	





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LaPC-002	General Matters	Removal of fields GF9 and GF13	<p>As stated in its first representation, the Council does not oppose renewable energy development and recognises the national and international imperative to expand resilient domestic energy production and decarbonise electricity generation in order to contribute to global efforts to limit temperature rise to 1.5°C above pre-industrial levels. Accordingly, the Council has adopted a constructive approach to the proposed development, seeking to influence the design through reasoned dialogue and informed feedback.</p> <p>Having considered the response provided by the Developer during and following the meeting held in September 2025, the Council is disappointed by the lack of concessions or design amendments and maintains its view that fields GF9 and GF13 should be removed from the scheme. Their exclusion would materially reduce ecological, flood, and visual impacts associated with the proposed development. The key considerations underpinning this position are outlined below.</p>	The Applicant notes these comments. The inclusion of the mentioned fields has been considered as part of the Environment Statement.
LaPC-003	Ecology and Biodiversity Hydrology and Flood Risk	Field GF9	Field GF9 lies immediately adjacent to designated ancient woodland (Three Shires Wood). The proposed access track providing entry to this parcel would run within approximately 10 metres of the woodland edge. Given the typical methods employed in the construction of haul roads within solar	The proposed access track in GF9 and its incursion into the Ancient Woodland Buffer Zone of Three Shires Wood is shown in Tree Impact Plan <b>Environmental Statement Figure 19.2.29 Tree Impact Plan Green Hill G and Cable Route Corridor Sheet 2</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Arboriculture		farm developments, the potential for adverse effects on adjoining woodland habitats such as soil compaction, disturbance to root systems, and alteration of hydrological conditions would be difficult to avoid. The Council therefore considers that the risk to the ecological integrity of Three Shires Wood remains significant and insufficiently mitigated.	<p><b>[APP-529]</b>. A 24m section of access track will be adjacent to Three Shires Wood. To avoid impacts to Three Shires Wood, the Applicant will be excluding construction traffic from the Ancient Woodland Buffer Zone (30m) in order to avoid the pruning of trees within ancient woodland to achieve clearance heights for tall construction vehicles or machinery and to avoid soil compaction - secured in the <b>OCEMP Revision A [REP1-131]</b>. The section of access road within the Ancient Woodland Buffer Zone will therefore only be used for operation and decommissioning. The access track will be installed using a 'no-dig' hard surfacing solution to prevent root damage to trees within the ancient woodland – secured in the <b>OCEMP Revision A [REP1-131]</b>.</p> <p>The access track to Field GF9 does not alter local hydrology or introduce any new drainage pathways. As secured in the <b>OCEMP Revision A [REP1-131]</b> and <b>OSMP [APP-550]</b>, the track will be constructed as a shallow, permeable surface laid over the existing ground without cut and fill. This avoids changes to overland flow routes, maintains infiltration and prevents lateral diversion of surface water.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>No drainage ditches, pipes or outfalls are proposed in this location. The permeability of the track ensures rainfall continues to infiltrate and move downslope in the same manner as the current baseline. The FRA confirms that the wider drainage pattern remains unchanged and that no increase in runoff or flood risk is generated by the access arrangement for GF9.</p> <p>On this basis, the hydrology, flood risk and drainage effects adjacent to Three Shires Wood are mitigated.</p>
LaPC-004	Hydrology and Flood Risk	Field GF13	<p>Field GF13 is situated closest to the settlement boundary and adjoins an ordinary watercourse along its northern edge. Lavendon has a well-documented history of flood incidents, and the local community has expressed legitimate concerns that the proposed development could exacerbate existing flood risk. This risk arises from the introduction of impervious surfaces associated with the photovoltaic (PV) arrays and ancillary infrastructure in close proximity to both the watercourse and residential properties. The Flood Risk Assessment and Drainage Strategy submitted by the Developer does not include a Sustainable Drainage System (SuDS) strategy, relying instead on the assumption that the reversion of arable land to grassland will improve</p>	<p>Field GF13 has been assessed in full within the <b>FRADS Report Revision A [REP1-053]</b> and the Green Hill G assessment in <b>Annex I [APP-107]</b>. These documents confirm that the solar array does not introduce impermeable surfacing across GF13. Rainfall drains to the existing ground beneath the panels, in line with the position set out in <b>NPS EN-3 paragraph 3.10.75</b>, which states that solar PV panels drain to the existing ground and that the hydrological impact is not, in general, significant.</p> <p>The FRA does not rely solely on the change from arable land to grassland. Greenfield runoff calculations for GF13 use the The Flood Estimation Handbook</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			infiltration rates and offset the increased runoff generated by the development. The Council does not consider this approach sufficiently robust to address localised flood concerns.	<p>(FEH) design rainfall, hydrological soil classifications and LiDAR topography. Runoff from associated infrastructure is controlled to greenfield rates and no new outfalls to the adjacent ordinary watercourse are proposed. The existing drainage pattern is therefore maintained and there is no mechanism for increased flow towards nearby residential areas.</p> <p>Separate hydraulic modelling for Lavendon was undertaken to explore whether additional flood alleviation measures could be delivered within Green Hill G. This work was not assessing the Scheme's impact but testing whether any practical on site changes could help the village. The modelling shows that the existing flooding in Lavendon is driven by wider catchment flowpaths, and that measures within Green Hill G cannot provide meaningful benefit. This helps to support the FRA position that the Scheme does not alter runoff pathways and will not increase flood risk off site.</p> <p>A detailed SuDS design will be secured under Requirement 11. Any measures needed to manage construction phase compaction or local drainage features will be confirmed at that stage in consultation with the Lead Local Flood Authority. The</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				assessment in <b>[APP-097]</b> and <b>[APP-107]</b> demonstrates that the Scheme will not exacerbate existing flood risk in Lavendon.
LaPC-005	Landscape and Visual Impact	Fields GF9 and GF13	Furthermore, the visual impacts associated with the inclusion of fields GF9 and GF13 have, in the Council's professional view, been underestimated. The Council notes that the formal request made by Milton Keynes City Council (MKCC) for the removal of these parcels on landscape and visual grounds has been rejected by the Developer, without satisfactory justification.	<p><b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> 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 <b>ES Appendix 8.1 [APP-078 &amp; APP-079]</b>, which has been progressed and agreed with the Local Planning Authorities.</p> <p>Please refer to response to MKC-4.9 of the <b>Applicant's Responses to Local Impact Report [EX2/GH8.1.14]</b> in regard to the design development of the Scheme and landscape and visual considerations.</p>
LaPC-006	Energy Need	Quantity of land	The overall target output for the Green Hill Solar Farm NSIP is 500 MW. It is understood that, employing current photovoltaic technologies, approximately four acres of land are required to deliver one megawatt (MW) of generating capacity. The total area	Section 3.9 of the <b>Statement of Need [APP-556]</b> describes that a significant capacity of new low-carbon generation must come forward to meet future national demand for low-carbon energy. Government's Clean Power 2030 Action



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>covered by the proposed development is approximately 1,200 hectares (ha), of which 168 ha are attributed to the cable route alone. Consequently, the area allocated to the solar farm sites themselves is estimated to be in the region of 1,030 ha.</p> <p>On the basis of the 4 acres : 1 MW ratio, an area of approximately 800 ha should be sufficient to deliver the target output of 500 MW. This implies a residual surplus of roughly 230 ha. While it is recognised that part of this additional area will accommodate essential supporting infrastructure such as access tracks, compounds, substations, and electrical equipment, it is noted that the photovoltaic (PV) areas relating specifically to parcels GF9 and GF13 cover 4.3 ha and 12 ha respectively.</p> <p>Given this context, it appears unlikely that the exclusion of these two parcels, with a combined reduction of 16.3 ha, would materially affect the scheme's overall generating capacity. The Council therefore questions the validity of the Developer's assertion that the removal of these fields would significantly compromise the scheme's delivery objectives.</p>	<p>Plan established a capacity range of 45-69GW of solar by 2035.</p> <p>Additionally, Section 3.7 of the <b>Statement of Need [APP-556]</b> describes that suitable and available grid connection capacity is in short supply, and that risks associated with the network development required to facilitate new connections should not be understated.</p> <p>Therefore the Applicant has proposed a scheme which seeks to deliver a meaningful quantity of low carbon electricity to the grid nationally from the proposed land and through the available grid connection. The Scheme is consistent with and addresses all important and relevant aspects of existing and emerging government policy.</p> <p>Please also refer to the responses to BPC-011 and SGHS-003, in respect of the need for all renewable energy generation and how the Scheme has been designed meet the grid connection capacity for export.</p> <p>Please note that as outlined in <b>Chapter 3: The Development Site Revision A [REP1-030]</b> the total area extent of the Order Limits is approximately 1,441.4</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				hectares (ha) comprising the Sites (1,200.6ha), the Cable Route Corridor (168ha), and the remaining area (approximately 72.8ha) allocated for temporary and permanent access routes as well as temporary construction compounds.
LaPC-007	General Matters	Overall conclusions	<p>The Council's principal requests remain consistent with those previously set out in its consultation response and subsequent relevant representation. They are summarised below:</p> <ul style="list-style-type: none"><li>• The Council considers the submitted Flood Risk Assessment (FRA) and associated mitigation strategy to be inadequate, as both rely extensively on assumptions and on low-resolution datasets that are unsuitable for a site-specific evaluation. Given Lavendon's recent and well-documented history of flooding—the most recent incident having occurred in September 2024—a detailed reassessment of local hydrological conditions, run-off dynamics, and proposed mitigation measures is warranted. This position is further substantiated by the findings of an independent technical review of the Developer's flood mitigation strategy, undertaken by resident hydrologist Mark Shepherd CEng</li></ul>	<p>Please refer to responses LaPC-001 to LaPC-006 above.</p> <p>Please also refer to the following response in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b>:</p> <ul style="list-style-type: none"><li>• LaPC-009 in regard to flood risk</li><li>• LaPC-008 in regard to removal of PV arrays, mitigation planting and landscape and visual impacts.</li><li>• LaPC-007 in regard to ecological buffers and connection to Three Shires Wood.</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>PrEng (Engineering Report: Assessment of Surface Water Runoff from Proposed Green Hill Solar Farm (Green Hill G). October 2025). The review identifies a series of methodological inconsistencies and flawed assumptions that call into question the robustness of the FRA and its conclusions.</p> <ul style="list-style-type: none"><li>• Removal of PV arrays from field GF13, to allow this parcel to be repurposed for the delivery of multifunctional flood attenuation and ecological mitigation measures. Specifically, The Council recommends that this area be instead utilised for biodiversity enhancement, for example through the creation of skylark plots and other open-habitat features to offset the loss of foraging habitat arising from the installation of PV infrastructure elsewhere within the site.</li><li>• Removal of field GF9 from the scheme, to be similarly repurposed for ecological mitigation and enhancement. This would help maintain habitat connectivity with the adjacent ancient woodland (Three Shires Wood) and contribute to the overall biodiversity net gain and</li></ul>	





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>landscape mitigation objectives of the scheme.</p> <ul style="list-style-type: none"><li>Enhanced landscaping along the boundary with Three Shire Way, achieved through increased tree planting density within the proposed new hedgerow (currently described as comprising 'irregularly spaced trees'). This measure would serve to reduce the visual impact of the solar farm from this well-used route and to further enhance the structural diversity and ecological function of boundary habitats.</li></ul> <p>These proposals are broadly aligned with the recommendations set out within Milton Keynes City Council's Local Impact Report and, on that basis, should be afforded full and proper consideration by the Examining Authority. In view of the widespread concerns expressed by residents of Lavendon regarding the matters outlined in this representation, the Parish Council respectfully requests that these issues be examined in detail and discussed during an Open Floor Hearing. This would provide an appropriate forum for local representatives and parishioners to articulate their views directly and to ensure that community</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			perspectives are meaningfully reflected within the examination process.	



## 5.5 Scaldwell Parish Council

**Table 5.5: REP1-189**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LaPC-001	General Matters	Consultation to date	<p>Since the proposals relating to the Green Hill Solar Farm NSIP were made public, Lavendon Parish Council (the 'Council') has followed developments closely and has engaged actively in reviewing the documentation concerning 'Site G'. From the outset, the Council's position has been to engage constructively with Island Green Power (the 'Developer'), sharing local knowledge on several key matters and conveying the community's concerns, with the aim of influencing the design process to achieve outcomes beneficial to both the local community and the natural environment.</p> <p>The Council submitted a formal response to the public consultation in December 2024. This response sought clarification on specific aspects of the proposals' design, outlined the wider concerns of the local community (principally relating to visual, ecological and flood risk impacts) and requested the removal of two fields from the scheme, identified as 'GF9' and 'GF13'.</p> <p>In August 2025, the Council submitted its first 'relevant representation' via the dedicated Planning Inspectorate (PINS) portal, reiterating the points raised during the earlier consultation. At that stage, the Developer had</p>	<p>The early engagement during the non statutory consultation phase is summarised in Chapter 4 of the <b>Consultation Report Revision A [REP1-017]</b>.</p> <p>A summary of comments made by Lavendon Parish Council in response to statutory consultation and targeted consultation for the Scheme is provided in Appendix 5.8 of the <b>Consultation Report [APP-031]</b> and Appendix 5.12 of the <b>Consultation Report [APP-035]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>not provided substantive responses to the matters raised.</p> <p>To seek further clarity and provide parishioners with an informed update, a meeting between two Council representatives and the Developer was held on 24 September 2025. The meeting was attended by representatives of the Developer and by consultants from several technical disciplines who had contributed to the suite of assessments supporting the Development Consent Order (DCO) application, including visual impact, flood risk and ecology.</p> <p>During the meeting, the Council representatives sought an update on the request for the removal of fields GF9 and GF13 from the scheme. The Developer advised that this would not be possible, citing the project's designation as Critical National Priority (CNP) infrastructure necessary to meet the UK's urgent energy objectives. Quoting from an official statement: 'Removing land parcels from the Scheme will reduce the expected annual generation of the Scheme. Although the carbon reduction, energy security and affordability benefits associated with the Scheme would remain significant, they would not be as large as they would be if delivered with land parcels removed'.</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LaPC-002	General Matters	Removal of fields GF9 and GF13	<p>As stated in its first representation, the Council does not oppose renewable energy development and recognises the national and international imperative to expand resilient domestic energy production and decarbonise electricity generation in order to contribute to global efforts to limit temperature rise to 1.5°C above pre-industrial levels. Accordingly, the Council has adopted a constructive approach to the proposed development, seeking to influence the design through reasoned dialogue and informed feedback.</p> <p>Having considered the response provided by the Developer during and following the meeting held in September 2025, the Council is disappointed by the lack of concessions or design amendments and maintains its view that fields GF9 and GF13 should be removed from the scheme. Their exclusion would materially reduce ecological, flood, and visual impacts associated with the proposed development. The key considerations underpinning this position are outlined below.</p>	The Applicant notes these comments. The inclusion of the mentioned fields has been considered as part of the Environment Statement.
LaPC-003	Ecology and Biodiversity Hydrology and Flood Risk	Field GF9	Field GF9 lies immediately adjacent to designated ancient woodland (Three Shires Wood). The proposed access track providing entry to this parcel would run within approximately 10 metres of the woodland edge. Given the typical methods employed in the construction of haul roads within solar	The proposed access track in GF9 and its incursion into the Ancient Woodland Buffer Zone of Three Shires Wood is shown in Tree Impact Plan <b>Environmental Statement Figure 19.2.29 Tree Impact Plan Green Hill G and Cable Route Corridor Sheet 2</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
	Arboriculture		farm developments, the potential for adverse effects on adjoining woodland habitats such as soil compaction, disturbance to root systems, and alteration of hydrological conditions would be difficult to avoid. The Council therefore considers that the risk to the ecological integrity of Three Shires Wood remains significant and insufficiently mitigated.	<p><b>[APP-529]</b>. A 24m section of access track will be adjacent to Three Shires Wood. To avoid impacts to Three Shires Wood, the Applicant will be excluding construction traffic from the Ancient Woodland Buffer Zone (30m) in order to avoid the pruning of trees within ancient woodland to achieve clearance heights for tall construction vehicles or machinery and to avoid soil compaction - secured in the <b>OCEMP Revision A [REP1-131]</b>. The section of access road within the Ancient Woodland Buffer Zone will therefore only be used for operation and decommissioning. The access track will be installed using a 'no-dig' hard surfacing solution to prevent root damage to trees within the ancient woodland – secured in the <b>OCEMP Revision A [REP1-131]</b>.</p> <p>The access track to Field GF9 does not alter local hydrology or introduce any new drainage pathways. As secured in the <b>OCEMP Revision A [REP1-131]</b> and <b>OSMP [APP-550]</b>, the track will be constructed as a shallow, permeable surface laid over the existing ground without cut and fill. This avoids changes to overland flow routes, maintains infiltration and prevents lateral diversion of surface water.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>No drainage ditches, pipes or outfalls are proposed in this location. The permeability of the track ensures rainfall continues to infiltrate and move downslope in the same manner as the current baseline. The FRA confirms that the wider drainage pattern remains unchanged and that no increase in runoff or flood risk is generated by the access arrangement for GF9.</p> <p>On this basis, the hydrology, flood risk and drainage effects adjacent to Three Shires Wood are mitigated.</p>
LaPC-004	Hydrology and Flood Risk	Field GF13	<p>Field GF13 is situated closest to the settlement boundary and adjoins an ordinary watercourse along its northern edge. Lavendon has a well-documented history of flood incidents, and the local community has expressed legitimate concerns that the proposed development could exacerbate existing flood risk. This risk arises from the introduction of impervious surfaces associated with the photovoltaic (PV) arrays and ancillary infrastructure in close proximity to both the watercourse and residential properties. The Flood Risk Assessment and Drainage Strategy submitted by the Developer does not include a Sustainable Drainage System (SuDS) strategy, relying instead on the assumption that the reversion of arable land to grassland will improve</p>	<p>Field GF13 has been assessed in full within the <b>FRADS Report Revision A [REP1-053]</b> and the Green Hill G assessment in <b>Annex I [APP-107]</b>. These documents confirm that the solar array does not introduce impermeable surfacing across GF13. Rainfall drains to the existing ground beneath the panels, in line with the position set out in <b>NPS EN-3 paragraph 3.10.75</b>, which states that solar PV panels drain to the existing ground and that the hydrological impact is not, in general, significant.</p> <p>The FRA does not rely solely on the change from arable land to grassland. Greenfield runoff calculations for GF13 use the The Flood Estimation Handbook</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			infiltration rates and offset the increased runoff generated by the development. The Council does not consider this approach sufficiently robust to address localised flood concerns.	<p>(FEH) design rainfall, hydrological soil classifications and LiDAR topography. Runoff from associated infrastructure is controlled to greenfield rates and no new outfalls to the adjacent ordinary watercourse are proposed. The existing drainage pattern is therefore maintained and there is no mechanism for increased flow towards nearby residential areas.</p> <p>Separate hydraulic modelling for Lavendon was undertaken to explore whether additional flood alleviation measures could be delivered within Green Hill G. This work was not assessing the Scheme's impact but testing whether any practical on site changes could help the village. The modelling shows that the existing flooding in Lavendon is driven by wider catchment flowpaths, and that measures within Green Hill G cannot provide meaningful benefit. This helps to support the FRA position that the Scheme does not alter runoff pathways and will not increase flood risk off site.</p> <p>A detailed SuDS design will be secured under Requirement 11. Any measures needed to manage construction phase compaction or local drainage features will be confirmed at that stage in consultation with the Lead Local Flood Authority. The</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				assessment in <b>[APP-097]</b> and <b>[APP-107]</b> demonstrates that the Scheme will not exacerbate existing flood risk in Lavendon.
LaPC-005	Landscape and Visual Impact	Fields GF9 and GF13	Furthermore, the visual impacts associated with the inclusion of fields GF9 and GF13 have, in the Council's professional view, been underestimated. The Council notes that the formal request made by Milton Keynes City Council (MKCC) for the removal of these parcels on landscape and visual grounds has been rejected by the Developer, without satisfactory justification.	<p><b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> 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 <b>ES Appendix 8.1 [APP-078 &amp; APP-079]</b>, which has been progressed and agreed with the Local Planning Authorities.</p> <p>Please refer to response to MKC-4.9 of the <b>Applicant's Responses to Local Impact Report [EX2/GH8.1.14]</b> in regard to the design development of the Scheme and landscape and visual considerations.</p>
LaPC-006	Energy Need	Quantity of land	The overall target output for the Green Hill Solar Farm NSIP is 500 MW. It is understood that, employing current photovoltaic technologies, approximately four acres of land are required to deliver one megawatt (MW) of generating capacity. The total area	Section 3.9 of the <b>Statement of Need [APP-556]</b> describes that a significant capacity of new low-carbon generation must come forward to meet future national demand for low-carbon energy. Government's Clean Power 2030 Action



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>covered by the proposed development is approximately 1,200 hectares (ha), of which 168 ha are attributed to the cable route alone. Consequently, the area allocated to the solar farm sites themselves is estimated to be in the region of 1,030 ha.</p> <p>On the basis of the 4 acres : 1 MW ratio, an area of approximately 800 ha should be sufficient to deliver the target output of 500 MW. This implies a residual surplus of roughly 230 ha. While it is recognised that part of this additional area will accommodate essential supporting infrastructure such as access tracks, compounds, substations, and electrical equipment, it is noted that the photovoltaic (PV) areas relating specifically to parcels GF9 and GF13 cover 4.3 ha and 12 ha respectively.</p> <p>Given this context, it appears unlikely that the exclusion of these two parcels, with a combined reduction of 16.3 ha, would materially affect the scheme's overall generating capacity. The Council therefore questions the validity of the Developer's assertion that the removal of these fields would significantly compromise the scheme's delivery objectives.</p>	<p>Plan established a capacity range of 45-69GW of solar by 2035.</p> <p>Additionally, Section 3.7 of the <b>Statement of Need [APP-556]</b> describes that suitable and available grid connection capacity is in short supply, and that risks associated with the network development required to facilitate new connections should not be understated.</p> <p>Therefore the Applicant has proposed a scheme which seeks to deliver a meaningful quantity of low carbon electricity to the grid nationally from the proposed land and through the available grid connection. The Scheme is consistent with and addresses all important and relevant aspects of existing and emerging government policy.</p> <p>Please also refer to the responses to BPC-011 and SGHS-003, in respect of the need for all renewable energy generation and how the Scheme has been designed meet the grid connection capacity for export.</p> <p>Please note that as outlined in <b>Chapter 3: The Development Site Revision A [REP1-030]</b> the total area extent of the Order Limits is approximately 1,441.4</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				hectares (ha) comprising the Sites (1,200.6ha), the Cable Route Corridor (168ha), and the remaining area (approximately 72.8ha) allocated for temporary and permanent access routes as well as temporary construction compounds.
LaPC-007	General Matters	Overall conclusions	<p>The Council's principal requests remain consistent with those previously set out in its consultation response and subsequent relevant representation. They are summarised below:</p> <ul style="list-style-type: none"><li>• The Council considers the submitted Flood Risk Assessment (FRA) and associated mitigation strategy to be inadequate, as both rely extensively on assumptions and on low-resolution datasets that are unsuitable for a site-specific evaluation. Given Lavendon's recent and well-documented history of flooding—the most recent incident having occurred in September 2024—a detailed reassessment of local hydrological conditions, run-off dynamics, and proposed mitigation measures is warranted. This position is further substantiated by the findings of an independent technical review of the Developer's flood mitigation strategy, undertaken by resident hydrologist Mark Shepherd CEng</li></ul>	<p>Please refer to responses LaPC-001 to LaPC-006 above.</p> <p>Please also refer to the following response in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b>:</p> <ul style="list-style-type: none"><li>• LaPC-009 in regard to flood risk</li><li>• LaPC-008 in regard to removal of PV arrays, mitigation planting and landscape and visual impacts.</li><li>• LaPC-007 in regard to ecological buffers and connection to Three Shires Wood.</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>PrEng (Engineering Report: Assessment of Surface Water Runoff from Proposed Green Hill Solar Farm (Green Hill G). October 2025). The review identifies a series of methodological inconsistencies and flawed assumptions that call into question the robustness of the FRA and its conclusions.</p> <ul style="list-style-type: none"><li>• Removal of PV arrays from field GF13, to allow this parcel to be repurposed for the delivery of multifunctional flood attenuation and ecological mitigation measures. Specifically, The Council recommends that this area be instead utilised for biodiversity enhancement, for example through the creation of skylark plots and other open-habitat features to offset the loss of foraging habitat arising from the installation of PV infrastructure elsewhere within the site.</li><li>• Removal of field GF9 from the scheme, to be similarly repurposed for ecological mitigation and enhancement. This would help maintain habitat connectivity with the adjacent ancient woodland (Three Shires Wood) and contribute to the overall biodiversity net gain and</li></ul>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>landscape mitigation objectives of the scheme.</p> <ul style="list-style-type: none"><li>Enhanced landscaping along the boundary with Three Shire Way, achieved through increased tree planting density within the proposed new hedgerow (currently described as comprising 'irregularly spaced trees'). This measure would serve to reduce the visual impact of the solar farm from this well-used route and to further enhance the structural diversity and ecological function of boundary habitats.</li></ul> <p>These proposals are broadly aligned with the recommendations set out within Milton Keynes City Council's Local Impact Report and, on that basis, should be afforded full and proper consideration by the Examining Authority. In view of the widespread concerns expressed by residents of Lavendon regarding the matters outlined in this representation, the Parish Council respectfully requests that these issues be examined in detail and discussed during an Open Floor Hearing. This would provide an appropriate forum for local representatives and parishioners to articulate their views directly and to ensure that community</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			perspectives are meaningfully reflected within the examination process.	



## 5.6 Stop Green Hill Solar

**Table 5.6: REP1-192**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-001	Development Consent Order	Site Selection	<p>The Applicant states that a viable grid connection was instrumental in defining the search area. In this regard reference is made expressly to NPS EN-3 paragraph 2.10.25 which say that; “applicants may choose a site based on nearby available grid export capacity”.</p> <p>The search area has not been restricted to sites near to the proposed point of connection at Grendon substation (“the POC”): instead the search area has been extended “until sufficient options for the land required for the Scheme were identified with willing landowners within a 20 kilometre radius”. It cannot be said that sites up to 20 km radius away from the POC are “near” to the POC.</p> <p>It is evident, moreover, that the focus of the site selection process was on largescale landownerships with potentially willing landowners<sup>10</sup>. It is not explained how either is a relevant planning consideration. It appears to be concerned, respectively, with the convenience of the promoter and the financial interests of a landowner, not</p>	<p>The Applicant has followed a step-by-step site selection process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. Details of the process are set out in <b>Appendix 5.1: Site Selection Assessment of the Environmental Statement Revision A [EX1/GH6.3.5.1_A]</b> Please also refer to <b>ES Chapter 5: Alternatives and Design Evolution of the ES [APP-042]</b>.</p> <p>NPS EN-3 outlines key influencing factors for site selection and design. These have been considered throughout the site selection process with a summary of response outlined in <b>Environmental Statement Chapter 5: Alternatives and Design Evolution [APP-042]</b>. This includes: irradiance and site topography, network connection, proximity of a site to dwellings, agriculture land classification and land type, accessibility, Public</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>with good planning in the public interest.</p> <p>Although it has been claimed that the proposal follows a landscape-led design, the site search clearly has not followed such an approach.</p> <p>Moreover, since as a matter of national policy, a nationally significant low carbon infrastructure is a critical national priority, in principle a compelling case in the public interest for a Compulsory Purchase Order could well be made if required. As long as reasonable efforts have been made by the acquiring authority to negotiate the purchase of land by agreement, there is no policy objection to the use of compulsory purchase powers. Consequently, the claim by the Applicant that the avoidance of the use of compulsory acquisition powers aligns with guidance is based on a false assumption. The site selection process is flawed.</p>	<p>Rights of Ways as well as any additional environmental considerations.</p> <p>The Site Selection Process, widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area <b>ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]</b> in compliance with National Policy Statement for Energy (EN 1) and National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection on commercial feasibility and the efficiency of the transmission of electricity to the grid, to avoid the use of BMV land as much as possible.</p>
SGHS-002	Consent Order	Site Selection	Chapter 5 of the Environmental Statement ("the ES"), "Alternatives and Design Evolution", set out the approach to site selection and design. In summary:	The first stage of the site selection process, in having a grid connection is key as this defines the feasibility of the Scheme. Without a defined and agreed grid connection, the Scheme would be potentially unfeasible.





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>a. The starting point was the availability of a connection to the grid at Grendon substation. No alternative connection points were considered;</p> <p>b. The scale of development (circa 1,000 hectares) is governed by the requirement to generate 500MW to satisfy the offer made by NESO</p> <p>c. The site search was based on the presence of willing landowners</p> <p>It should be noted at this stage that no planning considerations whatsoever were taken into account to define the location of development of the scale of the project. The three factors were the availability of a connection, a requirement to supply the grid with 500 MW and willing landowners.</p> <p>The second stage was to filter out land unsuitable because of topography; to avoid designated sites such as the RAMSAR and SPA as well as SSSIs etc; to avoid the use of BMV where possible; and avoid proximity to human receptors. Whilst reference is made to seeking to avoid BMV land, as will be explained later, the Application is singularly unsuccessful.</p>	<p>Once the Point of Connection was agreed an initial search radius was defined based on commercial feasibility and need to find a site with reduced environmental effects.</p> <p>The initial review of environmental considerations included seeking to minimise impacts on the best and most versatile agricultural land (defined as grades 1, 2 and 3a) and preferably use land that is not classified as best and most versatile (grades 3b, 4 and 5) and where possible utilise previously developed land, brownfield land, contaminated land or industrial land.</p> <p>The use of previously developed (brownfield) land and commercial roof-tops was considered. There was no brownfield land that met the minimum individual site size threshold nor the area of approximately 1,100 ha required for a network of sites in proximity for the Scheme, identified within the 20km search area from the Grendon Substation PoC.</p> <p>The Natural England ALC provisional mapping, as outlined on <b>ES Figure 20.3 [APP-533]</b>, indicates that the majority of the land within the 20km search area is Grades 3 or 2 BMV, with</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>the remaining land being primarily urban development associated with nearby residential areas or non-agricultural land ranging from ancient woodland to airfields. The <b>Farming Report [APP-571]</b> sets out that within the wider area the land is almost all in either the 20-60% BMV or &gt;60% BMV category. It is notable that much of Northamptonshire, particularly to the north and southwest of Grendon, consists predominantly of higher grade land, with a mixture of Grade 2 and Grade 3 often with both Grade 2 and Grade 3 land in individual fields. Due to the large extent of Grade 2 and Grade 3 agricultural land within the 20km search area and in order to focus the search on available land, land agents were contacted regarding potentially willing landowners within the area.</p> <p>NPS EN-3 does not prohibit the use of BMV land and recognises that NSIP scale solar schemes are likely to include some agricultural land, with the preference being to prioritise poorer quality land. To deliver the proposed capacity for the Scheme, it was therefore considered likely that a significant percentage of BMV land would be required. EN-3 states at</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				paragraph 2.10.29 that applicants should avoid the use of BMV 'where possible', and this is what the Applicant sought to do in its site selection process.
SGHS-003	Consent Order	Site Selection	<p>Stage one of the site selection process underpins the whole exercise of determining the scope of this application and notwithstanding further shifting and filtering that has been undertaken. It is unapologetically identified as the availability of willing landowners with large sites of sufficient scale to meet a commitment to connect to the Grendon substation.</p> <p>Further, the site search appears also to have identified and included in the Application far more land than is necessary. As the Application acknowledges: "...The Applicant does not propose a limit on the generating capacity of the Scheme in the DCO Application, as the environmental impacts of the Scheme are determined by the relevant design parameters rather than the capacity."</p> <p>It thus appears that more than 500MW could be generated by this proposal. The proposed land area included in the</p>	<p>In response to the first point raised, understanding the availability of landowners that are willing to enter into voluntary agreements is an important part of the site selection process. Compulsory acquisition powers can only be included in a DCO where they can be justified for the Scheme. Therefore, the availability of willing landowners reduces the need to rely on the use of compulsory acquisition powers to deliver the Scheme. Please refer to the <b>Statement of Reasons [APP-019]</b> for a full explanation of why compulsory acquisition powers have been included in the <b>Draft DCO Revision A [REP1-008]</b> and the reasons why this is justified.</p> <p>In response to the second point, as outlined in the <b>Grid Connection Statement [APP-557]</b> 'The connection offer was accepted in the form of a Bilateral Connection Agreement (BCA) between the Applicant and NESO, allowing for a Transmission Entry Capacity (TEC) of 500 MW (AC) export</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Application would therefore be more than is needed to generate 500MW.	<p>to and 500 MW (AC) import from the NETS. This was entered into in June 2021. The acceptance of the connection offer demonstrates that a connection at the Point of Connection is technically and financially viable'. This goes on to say 'The Grid Connection Agreement allows the Applicant to export the electricity produced at Green Hill A, A.2, B, C, D, E, F, and G, not to exceed 500 MW (AC). It also allows for the import of up to 500 MW (AC) of electrical energy to be stored in an Energy Storage Facility (for the purposes of the Application, this is assumed to employ battery technology and therefore referred to as a 'Battery Energy Storage System' or 'BESS' throughout this Application), located at Green Hill BESS and/or Green Hill C, to be exported at a different time, back to the NETS'.</p> <p>Additionally, National Policy Statement for Renewable Energy Infrastructure (EN-3) states at paragraph 2.10.55: "The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays.”</p> <p>The footnote corresponding to this paragraph states: ““Overplanting” refers to the situation in which the installed generating capacity or nameplate capacity of the facility is larger than the generator’s grid connection. This allows developers to take account of degradation in panel array efficiency over time, thereby enabling the grid connection to be maximised across the lifetime of the site. Such reasonable overplanting should be considered acceptable in a planning context so long as it can be justified and the electricity export does not exceed the relevant NSIP installed capacity threshold throughout the operational lifetime of the site and the proposed development and its impacts are assessed through the planning process on the basis of its full extent, including any overplanting.”</p>
SGHS-004	Ecology and Biodiversity	Incomplete Survey Data	The greatest potential for conflict arises where the proposal crosses the Nene and the NIA, where it adjoins the Ramsar site (the proposed BESS site at Grendon) and where it lies close to the SPA (Sites E to the north and F to	The Applicant notes this comment. Full details of the assessment in relation to Functionally Linked Land is provided in the <b>HRA Revision A [REP1-153]</b> , and the suitability of the mitigation package proposed is under discussion with



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>the south are the closest). The designated areas comprise a chain of former gravel pits and adjoining land in the Nene valley and are just downstream of the proposed BESS site at Grendon. The designated areas hosts major overwintering bird assemblages. There are groups of wildfowl and wading birds including bittern, gadwall, golden plover and lapwing. These species do not just use the RAMSAR site and the SPA. Land within 10 kilometres of the designated land it can be functionally linked. This Functionally Linked Land (FLL) is used for feeding and foraging, most notably by golden plover and lapwing. With the exception of Sites A and A2 which are beyond 10 kilometres away, the proposal falls within this threshold. The Assessment acknowledges that golden plover and lapwing tend to disperse widely from the SPA for foraging and thus are most at risk of impacts from loss of surrounding land. Wintering bird surveys have been undertaken and provide evidence of use of sites by golden plover and lapwing.</p> <p>However, the two full surveys have not been completed at Sites F and G and the presence of both golden plover and</p>	<p>Natural England. This will form a key part of the Statement of Common Ground with Natural England, to be submitted at Deadline 2.</p> <p>As a point of clarification, golden plover were not recorded at Green Hill G, and lapwing were only recorded flying over Green Hill G (not using the fields). Full survey data are set out within the <b>Environmental Statement Appendix 9.9 Wintering Bird Survey [APP-092]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			lapwing is noted on these two areas. The Assessment concludes that during construction, there is the potential for a significant adverse effect on the populations of golden plover and lapwing associated with the SPA. This would be significant at an international level given the SPA's designation.	
SGHS-005	Ecology and Biodiversity	Impacts on ecology	<p>Document SGHS/Ec.1 is a note addressing the potential impacts on ecology arising from the Application. This addresses the following:</p> <ul style="list-style-type: none"><li>• Evidence of pollution arising from the Llanwern Solar Farm on the Gwent Levels and includes a letter from Gwent Wildlife Trust and Friends of the Gwent Levels to the Welsh Minister for Climate Change. This concerns results of post-construction monitoring which demonstrates pollution and biodiversity loss;</li><li>• Significant other risks to RAMSAR/SPA wildlife arising from drainage from the development towards and into the River Nene;</li><li>• Effects on flora as evidenced by experience at the Gwent Levels;</li><li>• Effects on bat populations including evidence from a study by Bristol</li></ul>	<p>The Applicant has prepared the below response to address the points raised in Document SGHS/Ec.1. For clarity, the headings below mirror the headings from the document itself.</p> <p><b>Upper Nene Valley Gravel Pits</b></p> <p>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 <b>HRA Revision A [REP1-153]</b>. 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 mitigation package has been discussed with Natural England and will be agreed through the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>University which demonstrates that bat activity was significantly affected by solar installations.</p> <ul style="list-style-type: none"><li>• Effects on skylarks, lapwing and other ground-nesting birds.</li><li>• Effects on other birds;</li><li>• Significant gaps in the survey data relating to areas of the site which the potential for high biodiversity value and with potential for adverse ecological impacts;</li><li>• There is no consideration of the 'heat island' effect of solar arrays on biodiversity.</li></ul>	<p>forthcoming Statement of Common Ground <b>[EX2/GH8.3.6]</b>, to be submitted at Deadline 2.</p> <p>Each Scheme must be considered on its own merits, and the potential adverse impacts associated with Llanwern Solar are not necessarily comparable or applicable to the proposed Green Hill Solar Farm Scheme. It should be clarified that the mitigation referenced for Llanwern Solar relates to breeding lapwing, whereas the proposals for FLL relate to the provision of overwintering foraging areas.</p> <p><b>Effects on flora</b></p> <p>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. Typically, beneath panel habitat is less diverse, but nonetheless a robust sward can develop. Differences in habitat</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>condition have been factored into the <b>Environmental Statement Appendix 9.13 Biodiversity Net Gain Assessment Revision A [REP1-043]</b>, 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.</p> <p><b>Effects on bat populations</b></p> <p>There is research to suggest a potential displacement effect of arrays on foraging and commuting bats, with 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</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>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 discussed in further detail in <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-034]</b>.</p> <p><b>Skylarks, other ground-nesting birds and Red listed birds of Conservation Concern</b></p> <p>Effects on both breeding and wintering birds are also discussed in the <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-034]</b>. With regard to ground-nesting birds, including skylark, a residual adverse effect is concluded, acknowledging the displacement of a</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>large proportion of territories, although the Applicant has secured mitigation for 45.6% of the baseline territories. The majority of other species are expected to benefit from the enhanced habitats conferred by the proposals, with neutral or beneficial significant effects predicted.</p> <p><b>Extensive linear habitats along cabling routes have not been surveyed</b></p> <p>A proportionate approach to survey of the Cable Route Corridor was adopted, acknowledging that impacts here will be temporary and readily mitigated. This did however include a full ecological walkover survey of all accessible land within the Cable Route Corridor; survey results are provided in the <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-034]</b>. The assessments for all ecological features have considered impacts associated with the construction, operation and decommissioning of the Cable Route Corridor.</p> <p><b>Other Points</b></p> <p>The <b>OEPMS Revision A [REP1-131]</b> commits to the provision of bespoke</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>buffers around bat roosts and the nesting sites of Schedule 1 birds during the construction phase as required, which will be implemented on a case-by-case basis, taking into account the specific species' requirements. Adherence to the measures in this document will be secured through Requirement 8 of the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>The annual breeding and hibernation cycles of various species groups do result in varying ecological constraints throughout the year. This is unavoidable, and it is therefore the intention of the <b>OEPMS Revision A [REP1-131]</b> to minimise the impacts of construction work through the implementation of a precautionary approach to habitat removal work. The general approach to be applied is outlined in Section 6.2 of the OEPMS, and comprises the avoidance of the hibernation season for reptiles and amphibians wherever possible to avoid unlawful harm to these species. Habitat clearance will be conducted under an ecological watching brief (i.e. supervised by suitably experienced and/or licensed ecologists) to ensure species such as nesting birds, reptiles,</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>amphibians and small mammals are not harmed. Full details are provided in the OEPMS.</p> <p>The potential for noise and vibration to impact ecological receptors is assessed throughout Section 9.9 - Assessment of Likely Significant Effects of the <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-033]</b>.</p> <p>The Outline Landscape and Ecological Management is secured by Schedule 2, Requirement 7 of the <b>Draft DCO Revision A [EX1/GH3.1_A]</b>. The Scheme must be operated and maintained in accordance with the approved plan. Failure to comply with this requirement is a criminal offence.</p> <p>While the landowner may manage the Scheme under an agreement, responsibility for the Schemes maintenance will be the Applicant.</p> <p>Please refer to response to CLI-003 of the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in regard to heat island effect.</p>
SGHS-006	Ecology and Biodiversity	Incomplete assessment	There are gaps in the ecological surveys. Given the sensitivity of the location from an ecology perspective	The Applicant has responded to this matter in <b>Applicant Responses to Relevant Representations [REP1-</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			because of RAMSAR site and the SPA, an inadequate information base and a baseline which relies on assumptions is inadequate to be able to responsibly predict the potential impacts and determine what mitigation is necessary, or indeed whether satisfactory mitigation is achievable.	<b>161]</b> (please refer to the Applicant's response to NNC-027).
SGHS-007	Ecology and Biodiversity	Incomplete assessment	There is clear evidence that the proposal falls within the FFL for the RAMSAR/SPA and the scheme has the potential to harm lapwing, skylark and other important ground nesting birds. The area of the site is important for bats with some areas having greater significance. There is the potential for harm to the bat population on various parts of the site, but there is an incomplete evidence base. There is a risk of pollution arising from drainage from the development into the River Nene and also potential arising from any incident at the BESS.	<p>With regards to the assessment of FLL and the mitigation proposed, please refer to the Applicant's response to SGHS-004 above.</p> <p>With regards to bats, a full suite of bat activity surveys has been completed, with the final surveys being completed in Spring 2025. The results of these final surveys have been submitted in <b>Environmental Statement Appendix 9.6 Bat Surveys Revision A [REP1-047]</b>, at Examination Deadline 1. The <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-033]</b> concludes that residual effects on roosting bats would be neutral and non-significant, and residual effects on foraging/commuting bats would be beneficial at a Local level.</p> <p>The hydrology assessment confirms that the Scheme does not increase</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>pollution risk to the River Nene or designated sites. Surface water from the solar areas continues to drain as greenfield runoff, and any new or existing outfalls operate at controlled greenfield rates as secured in the <b>FRADS Report [REP1-053]</b>. The Scheme does not introduce new pollutant sources to these outfalls.</p> <p>For the BESS, <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b> secures a sealed and valve closed drainage system. During any incident all water within the compound is fully contained on site with no discharge until removal by tanker. This prevents contaminated water entering the wider drainage network. On this basis the drainage design removes the pathway for pollution to reach the Nene or connected habitats.</p>
SGHS-008	Hydrology and Flood Risk	Sequential and Exception Tests	<p>The themes in relevant policies relating flood risk are that development should be directed to areas with the lowest flood risk; that new energy infrastructure may be acceptable in areas liable to flood but it must satisfy the Sequential and Exception Tests. The issues in this case are the risk of the BESS site flooding and the potential consequences if it does, and</p>	<p>The Sequential Test has been applied across the Scheme in accordance with EN-1 and the NPPF. All substations and the BESS compound have been located in Flood Zone 1. <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b> confirms through site specific modelling that the BESS platform lies wholly outside the defended and undefended extents of</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the potential impacts of flooding on the construction, operation and decommissioning of the development.	<p>the 1 percent annual probability flood event with climate change. There is therefore no modelled flood pathway affecting the BESS.</p> <p>The Exception Test is not required for the BESS because it is in Flood Zone 1. The FRA considers construction, operation and decommissioning and confirms that the works remain outside Flood Zones 2 and 3. The Scheme does not introduce new flood risks and is consistent with the national policy requirement to direct development to areas of lowest flood probability.</p> <p>A Sequential Test and an Exception Test have been provided as Appendix B of the <b>Planning Statement Revision A [EX2/GH7.15_A]</b>. The Applicant considers that the Scheme passes the Sequential Test requirements. Given that the Scheme falls within areas of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that the Scheme meets the requirements of the Exception Test.</p>
SGHS-009	Hydrology and Flood Risk	BESS Location	NPPF categorises installations requiring hazardous substances consent as Highly Vulnerable. This excludes where there is a demonstrable need to locate such	The NPPF vulnerability categories are only relevant where development is sited in an area of flood risk. Site specific hydraulic modelling in <b>Flood Risk Assessment Annex J (Green</b>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or waterside locations or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure'. These circumstances do not apply to the BESS site.</p> <p>There is no demonstrable need to site the BESS at Grendon given that the Applicant has not considered whether there is an alternative point of connection (and concluded that there is not)</p>	<p><b>Hill BESS) [REP1-057]</b> confirms that the BESS compound lies wholly within Flood Zone 1 and above the 1 percent annual probability flood level with climate change. Because the BESS is in the lowest flood risk zone, the Highly Vulnerable classification does not apply in practice and there is no requirement to treat it as Essential Infrastructure for flood risk purposes.</p> <p>The Sequential Test is satisfied by locating the BESS in Flood Zone 1 and the Exception Test is not required. Hydrology and flood risk therefore place no constraint on the BESS location. Issues relating to electrical connection points lie outside the scope of the flood risk assessment and do not alter the conclusion that the BESS is appropriately sited in flood risk terms.</p>
SGHS-010	Hydrology and Flood Risk	Sequential and Exception Tests at Site BESS	The Sequential Test and Exception Test are referred to in Section 6 of the Flood Risk and Drainage Strategy. This refers to the Site Selection Report which assesses the Site against other Potential Development Areas and it states that the Sequential Test has been considered against each individual site forming part of the scheme. For the BESS site, reference is made to Annex J which it says	<b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b> is the hydraulic modelling and drainage design for the BESS and does not set out the policy tests. The Sequential Test and Exception Test are addressed in the main Flood Risk Assessment and Drainage Strategy, supported by the Site Selection Report. From a hydrology and flood risk perspective the position is straightforward: the site



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			addresses the Sequential and Exception Tests. However, there is no reference to the Sequential Test nor the Exception Test within Annex J.	specific modelling in Annex J confirms that the BESS compound lies wholly within Flood Zone 1 and above the 1 percent annual probability flood level with climate change. Because the BESS is in Flood Zone 1 the Sequential Test is satisfied and the Exception Test is not required. The hydrology conclusion is therefore unchanged by the content of Annex J.  A Sequential Test and an Exception Test have been provided as Appendix B of the <b>Planning Statement Revision A [EX2/GH7.15_A]</b> .
SGHS-011	Hydrology and Flood Risk	Sequential and Exception Tests Policy	Section 5 of Appendix B of the Planning Statement sets out the Sequential Test. However, this relies on the assessment of alternative sites and site selection assessment. The site selection process has been discussed earlier in this report. The exercise which has been undertaken considers the scheme as a whole. There is no consideration of disaggregation and whether the development, or something similar, could be accommodated on a number of smaller sites. Of course, that would be counter to the approach the Applicant has taken in seeking only large sites with landowners willing to sell. However, there is absolutely no	From a hydrology and flood risk perspective the Sequential Test outcome is clear. Site specific hydraulic modelling set out in <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b> confirms that the BESS compound lies wholly within Flood Zone 1 and above the 1 percent annual probability flood level with climate change. It is therefore not an area of significant flood risk. Because the BESS is already located in the lowest probability flood zone, the Sequential Test is satisfied and the Exception Test is not required.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			policy justification for that approach. Irrespective, bearing in mind that the BESS site is the only area where there is a significant risk of flooding, no consideration has been given to whether there is a suitable alternative site available or indeed a different connection point to the national grid.	<p>Questions of alternative land parcels, disaggregation or different grid connection points fall outside the scope of the flood risk assessment. They do not alter the hydrology conclusion that the BESS is sited in Flood Zone 1 and is acceptable in flood risk terms under the NPPF and EN-1.</p> <p>As set out in ES Appendix 5.1: Site Selection Assessment Revision A [EX1/GH6.3.5.1_A], the Applicant has undertaken a five-stage site selection process with an initial search area of 5 km radius from the Grendon Substation. The search area was then enlarged incrementally, with the clear preference of identifying land as close to the Grendon Substation as practicable, until sufficient options for the land required for the Scheme were identified with willing landowners within a 20 km radius. ES <b>Appendix 5.1 Site Selection Report [REP1-037]</b> provides an overview of the process including alternatives sites (potential development areas) considered.</p>
SGHS-012	Hydrology and Flood Risk	Adequacy of Sequential Test	In this case the proposal actually comprises a set of individual sites. The approach to the Test in only looking at the scheme as a whole and searching for an alternative in excess of 1,000	From a hydrology and flood risk perspective the Sequential Test outcome is clear. Site specific hydraulic modelling set out in <b>Flood Risk Assessment Annex J (Green Hill</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>hectares cannot be correct. Further, alternatives identified in Table 3.1: List of PDA Sites, are dismissed because the presence of constraints including SSSIs and heritage assets. The only constraint identified in relation to the Application is BMV agricultural land. The constraints arising from the presence of heritage assets (considered later in this report) and designated sites of international importance for ecology and biodiversity adjacent to the scheme are not acknowledged.</p> <p>Consequently, the sequential assessment for flood risk, such as it is, is not adequate. It has not addressed the question of disaggregation and specifically whether the site of the Grendon BESS could be located where there is a lower risk of flooding.</p>	<p><b>BESS) [REP1-057]</b> confirms that the BESS compound lies wholly within Flood Zone 1 and above the 1 percent annual probability flood level with climate change. It is therefore not an area of significant flood risk. Because the BESS is already located in the lowest probability flood zone, the Sequential Test is satisfied and the Exception Test is not required.</p> <p>Questions of alternative land parcels, disaggregation or different grid connection points fall outside the scope of the flood risk assessment. They do not alter the hydrology conclusion that the BESS is sited in Flood Zone 1 and is acceptable in flood risk terms under the NPPF and EN-1.</p>
SGHS-013	Hydrology and Flood Risk	Flood Risk and Access	<p>The proposed location of the BESS, adjacent to Grendon Sub-Station, is accessed from the north and the A45 via Station Road and White Mills Marina. A bridge at White Mills Marina is where Station Road crosses the River Nene. This road is susceptible to flooding. Flooding is a regular event with the road becoming impassible. Document SGHS/Hi.3 is a schedule</p>	<p>The flood risk assessment for the Scheme considers flood risk to the BESS compound itself and confirms through site specific modelling in <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b> that the compound lies wholly within Flood Zone 1 and is not at risk of flooding. The NPPF and EN-1 require safe access to and from the site during</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>from North Northamptonshire Council cataloguing flooding incidents on Station Road. Since January 2024 the road has been rendered impassible because it was flooded on six occasions. The impact of climate change can be expected to increase the frequency of flood events. Disruption arising from the road being closed will impact on the routing of construction traffic. Of more concern to residents are the consequences if emergency services are unable to access the BESS site in the event of an incident.</p>	<p>operation only where the site lies within an area of flood risk. As the BESS is in Flood Zone 1, there is no requirement for a dry access route for flood risk purposes.</p> <p>Flooding of Station Road at the White Mills Marina bridge is a known, localised issue that sits outside the Order Limits. It does not create a flood pathway to the BESS and does not alter the conclusion that the BESS is appropriately sited in flood risk terms. Construction traffic management and emergency access routing are addressed through the <b>OCEMP Revision A [REP1-145]</b> and the <b>OOTMP Revision A [REP1-157]</b>. The hydrology and flood risk position for Green Hill BESS remains unchanged.</p>
SGHS-014	Hydrology and Flood Risk	Flood Risk and the Potential for Pollution	<p>The issue of the potential for pollution has been raised in the context of ecology and biodiversity and the presence of the RAMSAR and SPA designated areas adjacent the site. The BESS element of the scheme lies the closest. There is a clear sensitivity about careful management to ensure that flooding events do not result in pollutants entering watercourses and affecting the designated sites.</p>	<p>The hydrology assessment confirms that flooding events will not create a pathway for pollutants from the BESS to enter nearby watercourses or designated sites. <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b> secures a sealed and valve closed drainage system for the BESS compound. During any incident the system isolates automatically and contains all water within the compound, including rainfall,</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>until it is removed by tanker following testing. The compound sits wholly within Flood Zone 1 and is not affected by flooding from Grendon Brook or the River Nene.</p> <p>These measures remove any connection between the BESS and surrounding watercourses during an incident and prevent pollutants reaching RAMSAR or SPA sites. The flood risk and hydrological pathway is therefore controlled.</p>
SGHS-015	Hydrology and Flood Risk	Surface Water Runoff and Localised Flooding at Lavendon (Site G)	<p>Document SGHS/F.2 is a preliminary assessment of surface water runoff and the risk of localised flooding from Site G at Lavendon although matters raised have a general application to all other sites. It provides an illustration of the particular and specific issues for drainage arising from solar panels including the concentrations of run-off, underlying soil conditions and a history of localised flooding events in Lavendon. It also provides a detailed critique of the Application.</p> <p>Key points of criticism are the following:</p> <ul style="list-style-type: none"> <li>• There are contradictory statements about the Anglian River Basin District</li> </ul>	<p>The hydrology and flood risk assessment for Site G <b>[APP-107]</b> is complete and proportionate and the points raised in SGHS/F.2 do not reflect the methods or evidence used in the FRA. The Anglian River Basin District Flood Risk Management Plan is referenced only for contextual baseline information. It is not relied upon for any quantitative input to runoff calculations or flood risk assessment, which are based on FEH design rainfall, national soils mapping and site topography.</p> <p>The FRA uses FEH design rainfall because it is the required national standard for flood risk work. FEH provides statistically derived depth–duration–frequency rainfall from long</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Flood Risk Management Plan 2021 to 2027;</p> <ul style="list-style-type: none"><li>• In terms of evidence, precipitation records are readily available but not used, no physical survey of local geology has been undertaken. No survey of the depth of topsoil has been undertaken;</li><li>• There is an acknowledgement that impermeable area will increase with a risk of uncontrolled runoff;</li><li>• There is no evidential basis to support the assertion that effects are assessed to be negligible;</li><li>• A disassociation between what is acknowledged in terms of increased runoff and surface water flooding and the consequences this arising;</li><li>• The provision of a temporary system during decommissioning is unsatisfactory as it does not provide a permanent solution;</li><li>• The EA Flood Maps do not reflect the incidents of flooding on Site G13. This site is not at "low risk of fluvial flooding". Evidence indicates the risk will clearly be higher;</li></ul>	<p>term catchment scale datasets and is the dataset expected by the EA and LLFA. Local rainfall observations cannot be used for design because they rarely cover a long enough period to capture extreme storms, are highly spatially variable and depend heavily on the period of record chosen, which makes them prone to misinterpretation or selective use. Using local records would understate design storm conditions and would not be accepted by the regulators. For the same reason, greenfield runoff calculations rely on FEH catchment descriptors, BGS geology mapping and hydrological soil classifications, which are designed to represent catchment scale behaviour and are the basis of recognised methods such as IH124. Point surveys of local geology or topsoil depth cannot be extrapolated to represent the full hydrological unit, would introduce greater uncertainty and are not required for an assessment of greenfield runoff.</p> <p>The Scheme does not introduce impermeable surfacing beneath the panels, and access tracks remain permeable. The FRA does not state that impermeable area will increase and there is no mechanism for</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>• General statements are made without clarification or specific evidence and are therefore unsubstantiated.</li></ul> <p>The conclusion of the preliminary assessment is that the proposed development (particularly G-13), has a demonstrable potential to increase surface water runoff and contribute to localised flooding. The Application documents are notably incomplete in their assessment.</p>	<p>uncontrolled runoff from the panelled areas. Runoff from associated infrastructure is controlled to greenfield rates as set out in the <b>FRADS Report [REP1-053]</b> and the <b>Flood Risk Assessment and Drainage Strategy Covering Report [APP-097]</b>. The assertion that effects are unsubstantiated does not reflect the position in EN-3 paragraph 3.10.75, which is clear that solar PV panels drain to the existing ground and their hydrological impact is not, in general, significant. This position is reflected in <b>ES Chapter 10 Hydrology, Flood Risk and Drainage [REP1-023]</b> and is supported by the standard datasets used in the FRA.</p> <p>There is no disassociation between the existing surface water issues in Lavendon and the Scheme outcome. The FRA recognises the baseline flooding history and confirms that the Scheme does not change hydrological connectivity or increase runoff. The existing mechanisms for localised flooding therefore remain unaffected. Temporary drainage arrangements during decommissioning are appropriate because the land is reinstated to its greenfield condition</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>and does not require a permanent system once the panels are removed. The EA Flood Map is indicative and is not used to define site specific flood extents. The FRA uses the best available local information and confirms that Site G is not affected by fluvial flooding in the one percent annual probability event with climate change. Comments on the accuracy of the Flood Map do not alter this conclusion.</p> <p>The FRA uses FEH design rainfall, national hydrological datasets, site topography and established greenfield runoff tools, providing a complete evidential basis for the conclusions reached. There is no hydrological mechanism by which the Scheme would increase surface water runoff or contribute to localised flooding at Site G.</p>
SGHS-016	Cultural Heritage	Heritage Assessment	<p>The Heritage Assessment:</p> <ul style="list-style-type: none"><li>• Does not address impacts to the character of the setting of heritage assets. This is particularly important at Easton Maudit;</li><li>• There are significant omissions in the Assessment;</li></ul>	<p><b>ES Chapter 12: Cultural Heritage [APP-049]</b>, supported by <b>ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> has assessed the impact of the Scheme to elements of setting that contribute to the significance of heritage asset. The assessment is in line with legislation, Policy and Guidance (see Section 12.3 of <b>ES Chapter 12: Cultural Heritage [APP-</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"> <li>• The likely impact on the significance of some heritage assets has been understated because intervisibility (or lack of it) between the asset and the proposed development has been a determining factor. In those circumstances there is a failure to have regard to other factors;</li> <li>• It does not address the networks and relationships between heritage assets. For example, the locational relationships between churches across the area has been ignored;</li> <li>• It does not consider impacts on non-designated assets which are not built. These include ridge and furrow which is important in the context of the rural settling for villages affected; and</li> <li>• It does not address the impact of the proposed mitigation on the character of the area and the setting of heritage assets.</li> </ul>	<p><b>049])</b> and follows the methodology set out in Section 12.4 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b>.</p> <p>A potential for a moderate adverse effect has been identified as a result of the Scheme to the Mears Ashby and Easton Maudit Conservation Areas and Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784), as a result of indirect (i.e. setting) impacts.</p> <p>The Scheme design has been established to reduce /remove impacts to the Mears Ashby, Grendon and Easton Maudit Conservation Areas. Attention has been given to the kinetic experience of heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). The visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in particular, along PROW with historical associations / views between heritage assets. Solar panels have either been removed (i.e. Fields EF9, EF16, EF34, FF8, FF9, FF13, FF14, FF16 and FF22) or offset (Fields EF5, EF10 to EF15, EF17, EF23 and EF33, FF11,</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>FF15, FF18, FF19 and FF26) away from Conversation Areas, and enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Areas.</p> <p>Impacts to ridge and furrow has been considered as part of <b>ES Chapter 12 Cultural Heritage [APP-049]</b>. Extant earthworks were identified in Fields CR1b.7 (HER: 5966/0/4), CR7.6 to CR7.9 (HER 6521/0/4). Otherwise, earthworks have been ploughed out. As identified in <b>ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [App-149]</b> a moderate / minor effect was identified during the construction phase to extant ridge and furrow earthworks, which is not considered significant.</p> <p>No adverse impacts were identified to built heritage assets (i.e. either directly or indirectly through setting) as a result of mitigation measures proposed for the Scheme.</p>
SGHS-017	Cultural Heritage	Heritage Assessment – Easton Maudit	The Application would fundamentally alter and harm the rural setting of the conservation area and its listed	As assessed in <b>ES Chapter 12 Cultural Heritage [APP-049]</b> , a moderate adverse residual effect was



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>buildings. That is acknowledged. However the level of harm is clearly understated because the rural, arable context for all of the heritage assets at Easton Maudit is given negligible weight within the assessment. This flows from the proposition that there is limited intervisibility between the designated heritage assets and the surrounding countryside. This fails to account for the range of factors identified in English Heritage guidance that define and contribute to the setting of heritage assets.</p> <p>From the perspective of a user of any road into and out of Easton Maudit, and users of PRow in the surrounding countryside, views of the church and village generally will be framed by planting which is expressly designed to screen fields containing solar panels beyond. The view and experience of the village would no longer be a viewpoint from open countryside, across open countryside towards the villages and church. The character of the setting would alter fundamentally.</p> <p>The mitigation planting to screen solar array from view on roads into and from the Easton Maudit would similarly be altered in character. The effect of the</p>	<p>identified to Easton Maudit Conservation Area and Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784).</p> <p>The assessment is in line with legislation, Policy and Guidance (see Section 12.3 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b>) including Historic England Guidance (i.e. GPA3 – The Setting of Heritage Assets).</p> <p>The Scheme design has been established to reduce impacts to the Easton Maudit Conservation Area and heritage assets within it. Panels have been removed from a number of fields to ensure the village will not be surrounded on all sides by solar panels. This will limit the intensification of the proposed built form in the area around the Conservation Area. Attention has been given to the kinetic experience of heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of Easton Maudit and other nearby villages. The visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in particular, along PRow with historical associations / views between heritage</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			planting would be to alter the character of the approaches to the village because the openness of the approaches from all directions would be compromised.	<p>assets (i.e removal of panels or set backs in Fields FF7, FF8, FF11, FF18, FF19 and FF28).</p> <p>Panels have been removed or setback away from approach roads to the Waston Maudit Conservation Area (i.e. Field FF13, FF14, FF15, FF16, FF22, FF25, FF26) so that the agricultural landscape can still be appreciated when entering the Conservation Area.</p> <p>Where panels are proposed enhanced screening of existing hedgerow and tree belts will also minimise impacts to elements of the rural setting that contribute to the character of the Conservation Area and the heritage assets within it.</p> <p>The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels.</p>
SGHS-018	Cultural Heritage	Heritage Assessment – Easton Maudit – Decommissioning	With regard to decommissioning, the heritage assessment anticipates the planting required to mitigate the development would be retained as part of a legacy landscape. The landscape will be altered substantially by the	The proposed landscape mitigation would see the enhancement of hedgerow where required. Such enhancements are considered to cause a beneficial long-term effect following decommissioning to the historic



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>proposed development. Following decommissioning it is anticipated that a full agricultural use would be reinstated. However, with the retention of substantial planting, that would be very mature after 60 years, the character of landscape would not be reinstated. There would be a permanent change to the approaches to Easton Maudit, the PRoW around the village, views into and out of the village and the way in which people experience the village. There is likely to be permanent change to the setting of heritage assets.</p>	<p>landscape character as they will reinforce the elements of the landscape that contribute to its historic character.</p>
SGHS-019	Cultural Heritage	The Relationship Between Easton Maudit, Grendon and Bozeat	<p>It is also acknowledged that the church also derives some "limited significance" from the sight lines between the St Mary's at Bozeat and the churches at Easton Maudit (Grade I), and Grendon (Grade II*). It is noted that the sight lines follow the routes of PRoW. It is argued that the proposal respect the lines of the PRoW and that as a consequence, the impact upon the asset would be minimal. However, the design of the development deliberately creates corridors. It is argued that these reduce the impact of development on the sight lines between the listed churches at Bozeat, Grendon and Easton Maudit. However, this is</p>	<p><b>ES Chapter 12: Cultural Heritage [APP-049]</b>, supported by <b>ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> has assessed impact of the Scheme to elements of setting that contribute to the significance of heritage asset. The assessment is in line with legislation, Policy and Guidance (see Section 12.3 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b>) and follows the methodology set out in Section 12.4 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b>.</p> <p><b>ES Chapter 12: Cultural Heritage [APP-049]</b>, supported by <b>ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> has identified a potential for</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>oblivious to the fact that the intervisibility between the churches is across countryside which is open and rural in character. This openness is a fundamental attribute of the setting of each of these churches<sup>90</sup>.</p> <p>In summary, whilst the heritage assessment concludes the Application would result in moderate adverse harm to the setting of the Grade I listed Church of St Peter and St Paul, the setting of the village conservation area and to setting of other listed buildings located within the conservation area, it demonstrably underestimates the harms likely to arise. The rural setting of these heritage assets would be changed fundamentally. Whilst it is acknowledged "substantial harm" is a high threshold, guidance within the PPG anticipates substantial harm could arise to the setting of heritage assets from solar development<sup>91</sup>. The proposal would seriously affect the significance of the Grade I listed church at Easton Maudit because the fundamental characteristic of the setting the setting would be lost. If however, it is not accepted there would be substantial harm, the impact must</p>	<p>a moderate adverse effect as a result of the Scheme to the Easton Maudit Conservation Area and Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784), as a result of indirect (i.e. setting) impacts.</p> <p>The Scheme design has been established to reduce / remove impacts to the Mears Ashby, Grendon and Easton Maudit Conservation Areas. Attention has been given to the kinetic experience of heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). As such, the visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in particular, along PROW with historical associations / views between heritage assets. Solar panels have either been removed (i.e. Fields FF8, FF9, FF13, FF14, FF16 and FF22) or offset (Fields FF11, FF15, FF18, FF19 and FF26) away from Conversation Areas, and enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			be at the top within the category of "less than substantial harm".	<p>contribute to the character of the Conservation Areas.</p> <p>The Applicant considers the level of harm identified to be appropriate and the assessment to have been undertaken in line with appropriate policy and guidance (i.e. Historic England GPA3 The Setting of Heritage Assets.).</p>
SGHS-020	Cultural Heritage	Mears Ashby	<p>Many of the points made in relation to rural character of the setting of Easton Maudit described above, apply to Mears Ashby:</p> <ul style="list-style-type: none"> <li>• The proposal would fundamentally alter and harm rural setting of the conservation area and its listed buildings;</li> <li>• The level of harm is clearly understated because the rural, arable context for all of the heritage assets at Mears Ashby is given negligible weight within the assessment. This flows from the proposition that there is limited intervisibility between the designated heritage assets and the surrounding countryside;</li> <li>• From the approach roads and PRoW, views of the village generally will be framed by planting designed to screen</li> </ul>	<p><b>Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> identified that the Scheme would potentially result in less than substantial harm to several assets within Mears Ashby (also see <b>12.9 Cultural Heritage Impact Assessment Tables [App-149]</b>). With the exception of the Mears Ashby Conservation Area the adverse effect, where identified as a result of Green Hill C to E, to heritage assets is not considered significant.</p> <p>As assessed in <b>ES Chapter 12 Cultural Heritage [APP-049]</b>, a moderate adverse residual effect was identified to Mears Ashby Conservation Area. The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>fields containing solar panels beyond. The view and experience of the village would no longer be a viewpoint from open countryside. The character of the setting would alter fundamentally;</p> <ul style="list-style-type: none"><li>• Mitigation planting would alter the character of the approaches to the village;</li><li>• There would be permanent change to the character of the approaches to the village because of the retention of mitigation planting.</li></ul>	<p>The Scheme design has been established to reduce impacts to the Mears Ashby Conservation Area. Attention has been made to the kinetic experience to heritage assets as you move through the landscape, especially along PROW with historical associations / views between heritage assets and approach roads into the Conservation Area. Solar panels have either been removed (i.e. Fields EF9, EF16, EF34,) or offset (Fields EF5, EF10 to EF15, EF17, EF23 and EF33) away from Conversation Areas, and enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Area.</p> <p>The proposed landscape mitigation would see the enhancement of hedgerow where required. Such enhancements are considered to cause a beneficial long-term effect following decommissioning to the historic landscape character as it will reinforce the elements of the landscape that contribute to its historic character.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-021	Cultural Heritage	Mears Ashby	<p>In addition, the Heritage Assessment does not address the impact of development on ridge and furrow because non-designated features, not including buildings, are scoped out of the analysis. Ridge and furrow is particularly prominent around Walgrave and Old. The significance of ridge and furrow is not as a heritage asset of its own, it is the fact it contributes to the relationship between a rural settlement and the rural farming hinterland around it. The presence of ridge and furrow lends weight to the rural, open and arable character of the surrounding landscape. This has not been addressed expressly in the Heritage Assessment.</p> <p>Mears Ashby is not as sensitive as Easton Maudit. However substantive issues and shortcomings apply to both villages that relate to their setting and the character of that setting. This aspect has not been taken into account. As with Easton Maudit, the rural setting of the Mears Ashby would be changed fundamentally. The impact of the Proposal on Mears Ashby has been understated. In this case the level of harm is assessed at "less than substantial harm". It follows that given</p>	<p>Impacts to ridge and furrow has been considered as part of <b>ES Chapter 12 Cultural Heritage [APP-049]</b>. Extant earthworks were identified in Fields CR1b.7 (HER: 5966/0/4), CR7.6 to CR7.9 (HER 6521/0/4). Otherwise, earthworks have been ploughed out. As identified in <b>ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [App-149]</b> a moderate / minor effect was identified during the construction phase to extant ridge and furrow earthworks, which is not considered significant.</p> <p><b>ES Chapter 12: Cultural Heritage [APP-049]</b>, supported by <b>ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> has identified a potential for a moderate adverse effect as a result of the Scheme to the Mears Ashby and Easton Maudit Conservation Areas.</p> <p>The Applicant considers the level of harm identified to be appropriate and the assessment to have been undertaken in line with appropriate policy and guidance (i.e. Historic England GPA3 The Setting of Heritage Assets.).</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the shortcomings of the assessment the level of harm should be at the upper end of this category of harm.	
SGHS-022	Cultural Heritage	Shortcomings in the Assessment	<p>The Heritage Assessment muddles visibility with significance. It fails to explore historical, functional, and communal associations of heritage assets and their settings. These factors are emphasised in Historic England's Good Practice Advice Note (GPA3) on the setting of Heritage Assets. The Assessment focuses narrowly on intervisibility and fails to consider how tranquillity, isolation, and rural character contribute to significance. This is particularly so in the context of ridge and furrow and various farmsteads which are affected by the Application.</p> <p>Setting analysis is sometimes superficial. For example, the impact on Castle Ashby Registered Park and Garden is dismissed due to lack of direct views from the proposal, ignoring the broader landscape context.</p> <p>Cumulative impacts from solar developments across the wider area are acknowledged but not meaningfully assessed, contrary to PPG expectations. The overall implications</p>	<p><b>ES Chapter 12: Cultural Heritage [APP-049]</b>, supported by <b>ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> has assessed impact of the Scheme to elements of setting that contribute to the significance of heritage assets. The assessment is in line with legislation, Policy and Guidance (<b>see Section 12.3 of ES Chapter 12: Cultural Heritage [APP-049]</b>) and follows the methodology set out in <b>Section 12.4 of ES Chapter 12: Cultural Heritage [APP-049]</b>. As such, when considering the significance of an asset, intervisibility with the land within the Scheme's Order Limits was one of several factors that was considered in determining how the asset's significance is derived. The assessment identified harm as a result of the Scheme where the rural landscape surrounding a heritage asset was considered to contribute to its significance. For example, this could be as a result of intended key views (i.e. intervisibility) or due to historical association.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			of the loss of a distinctive landscape character and the heritage implications of such a loss has not been addressed.	<p>The Scheme would introduce BESS and Substation infrastructure in agricultural fields to the north-east of the Grade I Listed Castle Ashby Register Park and Garden, and solar panels in the wider landscape to the east (Green Hill F). As stated in <b>ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b>, this would not impact the historical significance of the designated heritage asset, which will remain as a large swath of land comprising ponds, agricultural fields, woodland and manicured gardens. The asset does not derive any particular significance from land within the Scheme or share any historic or visual relationship with it. Despite comprising a very large area the asset will remain to a large degree inwardly focussed upon the formal castle grounds to the asset. Moreover, the northern-most part of the asset nearest to the site is in use as agricultural fields. While these contribute towards the overall significance of the site, the significance of the asset will otherwise remain intact.</p> <p><b>ES Chapter 12: Cultural Heritage [APP-049]</b> assesses the cumulative impact of the Scheme against other</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				proposed developments, not against the different sites that make up the Scheme.
SGHS-023	Cultural Heritage	Shortcomings in the Assessment	<p>As explained above, there is intervisibility between the churches at Easton Maudit, Bozeat, Grendon. The locations of these churches have been chosen so that they are prominent in the surrounding landscape. Views between these churches is across open countryside. English Heritage guidance refers to historic relationships between places being relevant in this context. The proposal is designed to retain linear lines of sight. However, it demonstrates no appreciation of the character of the views between the churches or the character of the countryside through which PROW route and from which there are views of the churches. The consequence is that impacts on the setting of heritage assets, particular the churches, is underestimated.</p> <p>Whilst the Proposal acknowledges the intervisibility of significant churches and maintains a visual corridor between Easton Maudit and Bozeat and Easton Maudit and Grendon, there is no unobstructed line of sight between Bozeat and Grendon. Solar panels in</p>	<p>The Scheme design has been established to with attention to the kinetic experience of heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). As such, the visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in particular, along PROW with historical associations / views between heritage assets. Solar panels have either been removed (i.e. Fields FF8, FF13, FF14, FF16 and FF22) or offset (Fields FF11, FF15, FF18, FF19 and FF26) away from Conversation Areas.</p> <p>No panels are proposed in Field FF8 and Panels have been offset in Fields FF18 and FF19 from the PROW to maintain the intervisibility between the Churches in Grendon and Bozeat.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			field FF8 and FF18 would be in that line of sight. When questioned in ISH-1, the evidence of the Applicant was that the removal of that field to create a line of site would not be viable. However, there is no evidence before the Examination about the viability of the scheme.	
SGHS-024	Cultural Heritage	Shortcomings in the Assessment	As outlined above when discussing ridge and furrow at Mears Ashby, nondesignated heritage assets with no building have been scoped out of the heritage assessment and therefore have not been addressed at all. As noted above, the significance lies in relationships that may arise between heritage assets. In particular, the presence of ridge and furrow supports is evidence of a historic pattern of farming which reinforces the role of a settlement as a focus for agriculture. Ridge and furrow will add tangibly to the setting of a village where agriculture has been a key function and is reflected in the character of the settlement.	Impacts to ridge and furrow has been considered as part of <b>ES Chapter 12 Cultural Heritage [APP-049]</b> . Extant earthworks were identified in Fields CR1b.7 (HER: 5966/0/4), CR7.6 to CR7.9 (HER 6521/0/4). Otherwise, earthworks have been ploughed out. As identified in <b>ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [App-149]</b> a moderate / minor effect was identified during the construction phase to extant ridge and furrow earthworks, which is not considered significant.
SGHS-025	Cultural Heritage	Shortcomings in the Assessment	The mitigation proposed throughout the assessment of heritage harm is regarded as a benefit because it screens the harm arising from solar panels and other infrastructure. However, mitigation planning is by	The proposed mitigation for built heritage assets includes the removal of panels from fields, offsets and landscape planting. The mitigation options have been carefully selected to minimise impacts to the overall historic



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			design, intended to restrict views and limit viewpoints, The landscape will in many places, for example Easton Maudit, become more enclosed. That will be a significant change over time. The character of the area will be different. This has not been considered in the Heritage Assessment and is relevant when addressing the impact on heritage assets such as the Grade I, St Peter and Paul's Church in Easton Maudit where the setting is presently open countryside with largely unrestricted views towards it from all directions, from PRow, and having regard to the intervisibility with churches in neighbouring villages across open countryside.	<p>landscape character and maintain open views across the landscape where appropriate.</p> <p>The proposed landscape mitigation would see the enhancement of hedgerow where required. Such enhancements are considered to cause a beneficial long-term effect following decommissioning to the historic landscape character as they will reinforce the elements of the landscape that contribute to the historic character.</p> <p>See SGHS-016 for discussion on impacts and mitigation for the Grade I Listed Church of St Peter and Paul</p>
SGHS-026	Cultural Heritage	Shortcomings in the Assessment	It is apparent that the heritage assessment has played down the likely impact on the significance of heritage assets because it has been concluded there is no or limited intervisibility between the asset and the proposed development. In those cases heritage assets which should have been addressed have been omitted from the assessment and there has been a failure to have regard to other factors. Further, proposed mitigation will change the character of the setting to	<p>The assessment is in line with legislation, Policy and Guidance (see Section 12.3 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b>) and follows the methodology set out in Section 12.4 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b>.</p> <p>See response to SGHS-022 regarding approach to assessment (intervisibility).</p> <p>See response to SGHS-025 regarding mitigation.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>heritage assets leading to harm. This has not been acknowledged or considered within the assessment.</p> <p>Omissions in the heritage assessment include the Grade 1 listed Church of St Michael in Lavendon and the Lavendon Conservation Area. Other heritage assets are identified but excluded from the further analysis because there is deemed to be no intervisibility between the asset and the proposed development. This disregards the contribution land to be developed makes to the setting of the heritage assets.</p> <p>Whilst heritage assets at Lavendon are described in section 5.6 of the Heritage Assessment, there is no reference to the Grade 1 listed Church of St Michael which sites in an elevated position within the village<sup>98</sup>. The church is referenced in the Gazetteer of Listed Buildings<sup>99</sup> in which it is identified as a Grade 1 Listed Building, but it is scoped out of the assessment. The notes in the Gazetteer say that the church is enclosed by the village with no relationship to the site. Therefore, the significance and setting of the asset is</p>	<p><b>Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]</b> details assets scoped in for assessment and was used during consultation with the Historic England and the Local Planning Authorities. Assets scoped out of assessment are considered to be agreed with the Milton Keynes Conservation Officer (see <b>ES Appendix 12.8 Consultation Tables [App-148]</b> this includes Lavendon Conservation Area, and the Church of St Michael (NHLE: 1212619).</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>likely to remain intact despite the proposed development.</p> <p>Similarly, there is no reference to the Lavendon Conservation Area. Lavendon is set within gently undulating farmland, with expansive views across the Ouse Valley. The village is surrounded by arable fields, hedgerows, and historic field patterns that reinforce its rural identity. The transition from open countryside into the village is gradual and visually coherent, with no abrupt urban edges. Views into and out of the Conservation Area are key to its setting. The rural setting enhances the significance of the Conservation Area by preserving its historic relationship with the landscape.</p> <p>More generally, the English Heritage GPA3 emphasises that visibility is not the sole determinant of the setting of a heritage asset. The fact the proposal may not be seen from heritage assets is not determinative of the proposal being outwith the setting of that heritage asset. Various heritage assets are identified within the Assessment but excluded from the further analysis because there is deemed to be no intervisibility between the asset and the proposed development. This disregards</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the potential contribution land to be developed makes to the setting of those heritage assets.	
SGHS-027	Cultural Heritage	Shortcomings in the Assessment	It is apparent that the heritage assessment has played down the likely impact on the significance of heritage assets because it has been concluded in a number of instances that there is no or limited intervisibility between the asset and the proposed development. In those circumstances there is a failure to have regard to other factors. There are also examples of proposed mitigation resulting in a harmful impact on the setting of heritage assets which has not been acknowledged or considered within the assessment.	The assessment is in line with legislation, Policy and Guidance (see Section 12.3 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b> ) and follows the methodology set out in Section 12.4 of <b>ES Chapter 12: Cultural Heritage [APP-049]</b> .  See response to SGHS-022 regarding approach to assessment (intervisibility).  See response to SGHS-025 regarding mitigation.
SGHS-028	Landscape and Visual Impact	The Landscape Assessment	The main points identified in the assessment of the Application by Carly Tinkler are summarised as follows:  A. Methodological Concerns with Applicant's LVIA:  • The LVIA misuses the term "landscape fabric" and fails to assess the overall character of the sites, contrary to GLVIA3 guidance.  • The LVIA does not identify national and local character areas/types as	The Applicant notes this comment. The LVIA <b>[APP-045]</b> 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 <b>ES Appendix 8.1 [APP078 &amp; APP079]</b> , which has been



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			landscape receptors, which is a significant departure from best practice. <ul style="list-style-type: none"><li>• Effects on National Character Areas (NCAs) were improperly scoped out, despite their relevance.</li></ul>	progressed and agreed with the Local Planning Authorities.
SGHS-029	Landscape and Visual Impact	The Landscape Assessment	B. Assessment Criteria Issues <ul style="list-style-type: none"><li>• The LVIA uses unbalanced four-point scales (e.g., High to Very Low) without a “Very High” category, potentially skewing results.</li><li>• Criteria for value, susceptibility, and sensitivity are unclear and not tailored to the specific landscape context.</li><li>• The LVIA conflates value and susceptibility inappropriately, leading to flawed sensitivity judgments.</li></ul>	The Applicant notes this comment. Please see response to SGHS-028.
SGHS-030	Landscape and Visual Impact	The Landscape Assessment	C. Landscape Sensitivity & Value <ul style="list-style-type: none"><li>• The LVIA underestimates landscape value and susceptibility across the sites.</li><li>• Site A, for example, is judged by the LVIA as Medium sensitivity, but the review finds it to be High–Medium due to historic character, tranquillity, and recreational use.</li></ul>	The Applicant notes this comment. Please see response to SGHS-028.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>• The LVIA fails to assess the value of entire sites, focusing only on individual elements ("fabric").</li></ul>	
SGHS-031	Landscape and Visual Impact	The Landscape Assessment	<p>D. Mitigation &amp; Enhancement</p> <ul style="list-style-type: none"><li>• The LVIA double-counts mitigation measures as enhancements, overstating benefits and underestimating adverse effects.</li><li>• Over-reliance on vegetation for screening is problematic due to uncertainties in plant growth, disease, and climate change impacts.</li><li>• No clear distinction between mitigation and enhancement measures; a detailed plan is needed.</li></ul>	The Applicant notes this comment. Please see response to SGHS-028.
SGHS-032	Landscape and Visual Impact	The Landscape Assessment	<p>E. Visual Effects</p> <ul style="list-style-type: none"><li>• The LVIA underestimates visual effects, particularly at Year 15, by assessing during summer (leaf-on) rather than winter (worst-case) conditions.</li><li>• Significant adverse visual effects are likely to persist at many viewpoints throughout the operation period, not just in the early years.</li><li>• The LVIA fails to conduct a full Residential Visual Amenity Assessment (RVAA), despite evidence that some</li></ul>	The Applicant notes this comment. Please see response to SGHS-028.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			properties may experience Major Adverse effects.	
SGHS-033	Landscape and Visual Impact	The Landscape Assessment	<p>F. Amenity &amp; Health Impacts</p> <ul style="list-style-type: none"><li>• The development would negatively affect residential, recreational, and social amenity, including tranquillity, views, and quality of life.</li><li>• Risks include noise, light pollution, glint and glare, and safety concerns from enclosed PRow corridors.</li><li>• Potential for adverse effects on local businesses reliant on tourism and recreation.</li></ul>	<p>The Applicant notes this comment. Please see response to SGHS-028.</p> <p>The Applicant has assessed tourism and recreation receptors most likely to be impacted by the Scheme in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b>. This includes local businesses and facilities reliant on visitors where it is anticipated that the Scheme may directly impact upon their ability to operate, and on individual tourism and recreation receptors such as local attractions, PRow, and sports venues. Industry impacts to accommodation and food business, cultural facilities, and sports and recreation business more generally have been considered in the likely effect on visitor spending. The greatest level of effects to tourism are anticipated during the Scheme's construction, during which it is assessed there is a likely impact of a loss of up to 29 FTE jobs, equivalent to a loss of up to £1.66 million in visitor spending per annum in the Study Area. This is equivalent to 0.16% of the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>tourism economy in the assessed area, and is therefore not anticipated to be significant.</p> <p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'HUM-001, HUM-005, and HUM-006' in respect of assessment of impact on amenity, wellbeing, and access to leisure facilities.</p> <p>The assessment undertaken in in <b>ES Chapter 18: Human Health [APP-055]</b> considers a wide range of health determinants that consider the physical health and wellbeing impacts of the Scheme. This include, but are not limited to, impacts on health from changes to air quality, and from noise and vibration. No significant adverse effects to health and wellbeing are assessed as likely to occur at any phase of the Scheme.</p>
SGHS-034	Landscape and Visual Impact	The Landscape Assessment	The LVIA is preoccupied with "landscape fabric" which are individual components within the landscape such as landform, hedgerow, trees and woodland. This approach ignores landscape features (which are particularly important given the significant of church spires and towers	The Applicant notes this comment. Please see response to SGHS-028.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			in the landscape). Focusing on landscape fabric has resulted in there being no overall assessment of landscape character and the impact of development on that character.	
SGHS-035	Glint and Glare	Glint and Glare Assessment	<p>Glint and glare is addressed in Appendix 1 to the Landscape Statement (Document SGHS/CT.3). The conclusions are in summary:</p> <ul style="list-style-type: none"> <li>• The method used / approach taken in the Glint and Glare Assessment ("GGA")<sup>114</sup>, to assess the Application is flawed and cannot be relied on for decision-making purposes;</li> <li>• Levels of adverse effects would be higher than the GGA predicts, and for some visual receptors on and in close proximity to the site, potentially 'significant' adverse. Levels of adverse effects on landscape character would also be very high; and</li> <li>• The GGA should be revised, and the LVIA / ecological / heritage assessments revised accordingly to factor in the results.</li> </ul>	The Glint and Glare Assessment has been undertaken based on industry guidance and good practice. The legislation and guidance followed completing the Glint and Glare Assessment is outlined in <b>ES Chapter 15 Glint and Glare [APP-052]</b> in section 15.3. The assessment methodology has been accepted in previous solar DCO applications, as well as by Local Planning Authorities across the UK.
SGHS-036	Glint and Glare	Compliance with Policies	The matters raised by development plan policies have been identified above. The first matter is whether the proposal been genuinely design led.	The Scheme design has been established to reduce impacts to Heritage Assets (such as the Mears Ashby and Easton Maudit Conservation



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>This is a fundamental point which has been addressed at the beginning of this statement. The scheme has clearly been led by land availability. Design has been undertaken to try to make the best outcome on the land available. It has led to an unsatisfactory compromise solution which causes significant planning harm, particularly with regard to the impact of the proposal on heritage assets.</p> <p>The second matter is whether the design of the proposal had regard to the role of the landscape in forming the character and providing the setting for rural settlements. It has not. The proposal would fundamentally alter the character of the landscape and the settings rural settlements. The openness of the landscape between settlements would be comprised to the detriment of the character of villages. This is especially relevant to villages with a high heritage value such as Easton Maudit and Mears Ashby.</p> <p>The third point is whether the adverse impact on the landscape been mitigated. As noted by Ms Tinkler, the proposed mitigation has not addressed adverse impacts on landscape character. Further, the mitigation itself,</p>	<p>Areas). Attention has been made to the kinetic experience to heritage assets as you move through the landscape, especially along PROW with historical associations / views between heritage assets, and approach roads into the Conservation Area. Enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Areas.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>whilst presented as virtuous and that it would leave a legacy following the decommissioning of the project, would lead to a substantial change to the character of the landscape, which in places such as the open countryside around Easton Maudit, would be harmful.</p> <p>The fourth matter is whether the LVIA forming part of the Application fairly addressed the impacts of the proposal on the character of the landscape. The review by Ms Tinkler shows that the design of the scheme has not addressed the impact on the character of the landscape.</p> <p>Having regard to the overall approach of the development plans for the area and noting the particular sensitivity of the countryside providing a setting for rural villages, the proposal does not accord with landscape policies.</p>	
SGHS-037	Agriculture and Soils	Impact on Agricultural Land	The collection of sites comprising the Application include a high proportion of BMV agricultural land. Of Sites A to G, all include Grade 2 and Grade 3a land and Sites A and E include a small percentage of Grade 1 land. The total area of these sites is 1,141 hectares, of which 767 hectares (67%) are BMV	The land quality of the parcels within the Site includes land of BMV quality. Policy does not require that solar development avoid the use of land of BMV quality, but that where BMV land is included this should be justified.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			land. The Application does not avoid the use of BMV agricultural land.	<p>The <b>Farming Report [APP-571]</b> describes in section 3 and section 9 how the predicted land quality of the area is a mixture of mostly 20 – 60% BMV and &gt;60% BMV. The identified land quality across the Site overall is 65% BMV, which is in keeping with the mix across the wider area. Land quality can only be identified by field survey, which is an intrusive and slow process, and given the mixed land grades identified across the sites, there is no reason to anticipate that other land nearby would be other than a mix of BMV and non-BMV quality.</p> <p>Therefore the use of BMV land has been justified and any losses minimised where reasonably possible.</p>
SGHS-038	Agriculture and Soils	Impact on Agricultural Land	<p>The concerns of Stop Green Hill Solar are set out in document SGHS/Ag.7. This refers to an article which raises the following issues:</p> <ul style="list-style-type: none"> <li>• Farmland is being lost and there are multiple competing pressures that that will continue to be a threat in the future;</li> <li>• Food production per capita is declining despite growths in productivity;</li> </ul>	<p>SGHS raise a concern on two topics in this part of their response:</p> <ul style="list-style-type: none"> <li>• rate of loss of agricultural land;</li> <li>• the implications for food security.</li> </ul> <p><b>Loss of Land</b></p> <p>It is important to recognise that solar farms do not result in the loss of farmland. They are reversible and do not adversely affect land quality, except</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>• There is an increase dependence on imports.</li></ul> <p>SGHS/Ag.7 expands on the points above. It also identifies additional pressure on agricultural land in Northamptonshire because of HS2; logistics developments based on excellent road and rail links; and increased pressure for housing development.</p>	<p>(as described in <b>Chapter 20 Agricultural Circumstances of the Environmental Statement [APP-057]</b>) for small areas. Unlike developments for transport infrastructure, housing, logistics etc, the land quality is not affected.</p> <p>There will be an inhibition on using the land for arable cropping, but food production (grazing of sheep) can continue.</p> <p>On decommissioning, the land will be available for arable cropping.</p> <p>The Government's position, as set out in the Solar Roadmap (Department for Energy Security and Net Zero, June 2025) is that "the biggest risk to food security and the natural environment is the climate and nature crisis. That is why it is important that the UK takes a leadership role, working with partners around the world, in accelerating to net zero, including by rapidly expanding solar power generation".</p> <p>There will be no loss of land as a result of the Proposed Development, as described in Chapter 20 of the ES.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p><b>Food Security</b></p> <p>As set out in the Solar Roadmap quoted above, the expansion of solar power is intended to address climate change, which is the biggest threat to food security.</p> <p>Government's land use policies anticipate the need for land use to change. The HM Government "Land Use Consultation" (January 2025) anticipates the need for significant land use change or management change to deliver housing, energy, environmental and climate benefits, involving 19% of agricultural land. It is noted that "the Government is committed to maintaining food production. Our assessment is that, based on historical trends of productivity improvement, and supported by new and emerging innovations, the impact of these land use changes on domestic food production will be offset by productivity improvements" (pages 77 – 79).</p> <p>The Food Security Report 2024 (Department for Environment, Food and Rural Affairs, United Kingdom Food Security Report 2024, 11</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				December 2024) in the executive summary records s stable, and slightly improving, ratio of importation and production: <b>"The UK's overall balance of trade and production is broadly stable.</b> The UK continues to source food from domestic production and trade at around an overall 60:40 ratio. <b>Key statistic:</b> The production-to-supply ratio was at 62% for all food and 75% for indigenous foods (meaning those that can be grown in the UK) in 2023, showing a small increase from 61% and 74% in 2021. This is a continuation of the broadly stable trend set in recent years".
SGHS-039	Agriculture and Soils	Loss of Productive Arable Land	It is argued that the sites will remain in agricultural use during the operation of the development and as a consequence there would be no loss of high quality land. Further, it is argued that the development is for a temporary period and that arable farming could be reinstated following the decommissioning of the project after 60 years. It is relevant that policy with NPS EN-3 relates specifically to NSIPs and a section is specific to solar photovoltaic generation. Policy to direct development away from BMV land is in the context that development will be for a temporary period and that land	<p>An analysis of these matters is made in both the Environmental Statement <b>Chapter 20 Agricultural Circumstances [APP-057]</b> and the <b>Farming Report [APP-571]</b>.</p> <p>The effects of the Proposed Development on agricultural land, soil and land use, including the wider effects on food production, are fully assessed.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>occupied by solar panels can be used for grazing. The fact that development is temporary and that an agricultural use could be maintained are no justification to disregard policy to direct development to land of a lower quality, or to limit the weight to be given to this policy in the decision making process.</p> <p>Potential adverse impacts on soil quality are addressed in Appendix F to the Landscape Statement (document SGHS/CT.4).</p>	
SGHS-040	Human Health	Potential Impacts on Amenity	<p>Potential impacts on amenity in this context arise mainly from activity and disturbance in the construction phase of the project. Potential impacts on PRoW and recreational value of the countryside affected by the development and specific concerns relating to the BESS are address later in this report.</p> <p>Adverse effects on residential and visual amenity are addressed in the Landscape Statement.</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'HUM-001 and HUM-006' in respect of assessment of impact on amenity, wellbeing, and access to PROWs and the countryside.</p> <p>Where SGHS have made specific comments in respect of BESS and Landscape, respectively these are addressed in this document below, and in the <b>Applicant's Response to Deadline 1 Submissions [EX2/GH8.1.15]</b>.</p>
SGHS-041	Human Health	Public Rights of Way	<p>The significant of PRoW is considered in the Landscape Statement. The PRoW are significant features in the landscape and function literally as</p>	<p>The Applicant confirms a full assessment of PROWs is set out in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>wayfinders in the context of the heritage of the area. The openness of the landscape through which the PRow route is significant and proposed mitigation to screen solar array would harm the landscape character, the recreational enjoyment of the PRow and as has been described, the setting of heritage assets.</p> <p>Document SGHS/O.4 refers to paragraph 4.1.7 of NPS EN-1 in the context of the of addressing the potential benefits and potential adverse impacts of any development application and these include the effect on "human health and public safety". This addresses the assessment contained within APP/GH6.2.18 ES Human Health. In summary, the critique notes the following key points:</p> <ul style="list-style-type: none"> <li>• The assessment of the Application is inconsistent across the settlements which are considered: Walgrave is omitted entirely;</li> <li>• The local community is highly sensitive to the closure of PRow, even on a temporary basis, and changes to their character;</li> </ul>	<p>and its <b>Appendix (Revision A) [REP1-079]</b>. This assesses the impact on the useability and user experience of each PRow likely to be affected by the Scheme individually at the construction, operation, replacement, and decommissioning phases of the Scheme. This includes consideration of landscape and heritage impacts, and assesses all PROWs that directly and indirectly interact with the Scheme.</p> <p>The assessment in <b>ES Chapter 18: Human Health [APP 055]</b> furthermore considers the health and wellbeing impact of changes to the use and enjoyment of PROWs and access to open space and leisure space, and finds no likely significant adverse effects at any phase of the Scheme.</p> <p>The Scheme design includes embedded mitigation to reduce adverse effects on PRow user experience, including a minimum 15 m offset from PRow centrelines to Solar PV infrastructure (set out in the <b>CDPP Revision A [REP1-151]</b>) with fencing generally 8-10 m from PROWs. Groundcover planting such as tussocky field margins and enhancement to hedgerows are committed to in the <b>OLEMP Revision A [REP1-137]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"> <li>• The impact on expectations and hence cognitive effects should be reconsidered; and</li> <li>• The impact on economic values and combined effects on community belonging and identity should be fully accounted.</li> </ul>	These measures are secured by requirement in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> .
SGHS-042	Human Health	The Waendel Walks	The proposal is likely to make walks less attractive because of the visual impact of solar arrays; the fact that planting will create a degree of enclosure on PRow (and throughout the area of the scheme generally), that presently does not exist, and there will be a loss of openness and views of the rural villages.	<p>The Applicant has assessed the likely effect of the Scheme on the International Waendel Walk in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b> and finds a likely <b>significant adverse effect</b> during construction, due to the events international importance and thus high sensitivity to changes.</p> <p>With specific regards to the what the Applicant is doing to ensure the minimisation of impacts to the International Waendel Walk, please refer to the <b>Applicant's Response to ExA First Written Questions Q19.0.1-19.0.3 [REP1-163]</b>. The Applicant has furthermore been in direct contact with Wellingborough Town Council as the event organisers to ensure protective mitigation measures during construction are satisfactorily agreed.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				These are secured through the <b>OCEMP Revision A [REP1-131]</b> by Requirement 13 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> .
SGHS-043	Traffic and Transport	Routes and Access Points	<p>The important points of this note are the following:</p> <ul style="list-style-type: none"> <li>• The highway assessment forming part of the Application demonstrates limited understanding of how the local highway network operates. In particular, the impact of topography and vertical sight lines and stopping distances do not appear to have been taken into account;</li> <li>• No Stage 1 Safety audit has been undertaken;</li> <li>• Topography is highly relevant given the requirement for abnormal loads for the construction of the scheme;</li> <li>• The proposed access to Green Hill A.2 raises a road safety concern;</li> <li>• The proposed access to Compound CC1 also raised road safety concerns;</li> <li>• The proposed access to Green Hill C raises road safety concerns arising from the topography limited visibility and the fact the A45 has the national speed limit;</li> </ul>	<p>The design of the accesses is based on topographical data, where available, and OS mapping and considers visibility splays and stopping distances. Detailed design of the accesses would be undertaken post DCO, which would include the various stages of Road Safety Audits.</p> <p>Article 16 (traffic regulation measures) of the <b>Draft DCO Revision A [REP1-008]</b> provides the undertaker the power to temporarily reduce the speed limit on any road for the purposes of construction, maintenance or decommissioning of the authorised development.</p> <p>Please refer to the <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> response to Q20.0.12 on the Highfield Road access strategy.</p> <p>Please refer to Section 3 of the <b>Transport and Access Routes Supporting Document [REP1-167]</b> for</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>• Accesses D1, D2, D3, D4 and E1 are all off Highfield Road which is of insufficient width to accommodate large vehicles in two way movement</li><li>• There are problems with the exceptional load route that will come through Brafield and Cogenhoe. Fundamentally the route is not suitable; and</li><li>• Given the proposed management plan to control hours of deliveries, there is not space for HGV waiting nearby. It is unlikely it will be practical to adhere to the proposed controls in the particular circumstances arising in this location.</li></ul>	<p>information on AIL routes and management.</p> <p>As set out in the <b>OCTMP Revision A [REP1-145]</b>, a delivery management system is proposed to be implemented to enable deliveries to be managed during the construction phase. This is standard practice and used for construction projects to manage deliveries. The detailed CTMP, to be approved by the relevant planning authority, is secured in Schedule 2, Requirement 15 of the <b>Draft DCO Revision A [REP1-008]</b>.</p>
SGHS-044	Traffic and Transport	Highways Matters	<ul style="list-style-type: none"><li>• The Outline Construction Management Plan appears to be based on a desk top analysis; information lacks detail; significant assumptions on key matters which undermine the reliability of the Plan. There are also contradictory statements;</li><li>• Conflicting statements as to whether Mears Ashby Road, Earls Barton will be used for HGV traffic;</li><li>• For the construction phase of development, information is based on experience elsewhere. However, there</li></ul>	<p>The <b>OCTMP Revision A [REP1-145]</b> has been prepared based on the Green Hill study area and project requirements during the construction phase. This includes the requirement for a Construction Worker Travel Plan to reduce the impacts from construction workers on transport receptors.</p> <p>Please refer to Section 2 of the <b>Transport and Access Routes Supporting Document [REP1-167]</b> which provides clarification of the HGV routes to the proposed accesses.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>is no explanation to demonstrate sites elsewhere are comparable to the current proposal;</p> <ul style="list-style-type: none"><li>• There is contradicting evidence as traffic generation during the construction phase;</li><li>• The proposed management of deliveries will be impractical in a real life scenario;</li><li>• The proposals for construction compounds for parking and the provision of shuttle buses is supported but likely to be an unrealistic aspiration in a real life scenario;</li><li>• There is no consideration of the need in a real world scenario for traffic control during the construction phase which is likely to cause very substantial disruption; and</li><li>• It is impractical to expect the size of vehicles required for the construction of the BESS at Grendon to successfully navigate the local highway network.</li></ul>	<p>Article 16 (traffic regulation measures) of the <b>Draft DCO Revision A [REP1-008]</b> provides the undertaker the power to temporarily reduce the speed limit and implement other traffic regulation measures on any road for the purposes of construction, maintenance or decommissioning of the authorised development.</p> <p>The Abnormal Indivisible Load (AIL) Routes have been proposed by Wynns, a consulting engineering firm specialising in the transportation of AILs. The AIL Assessment is included as <b>Appendix D of the Transport Assessment Parts 2 and 3 [APP-152] and [APP-153]</b>. This demonstrates that the proposed routes are able to accommodate the size of AIL movements required at each location.</p>
SGHS-045	Traffic and Transport	Accessibility	<p>It has been noted in considering flood risk that key local roads frequently become impassible. Potentially, this could impact on construction traffic. However, of more concern to local</p>	<p>The BESS compound lies wholly within <b>Flood Zone 1</b>, as confirmed by the site specific modelling in <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b>. It is not at risk of</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			people are circumstances if an incident happens and the BESS and emergency vehicles cannot access the site. Station Road is the main access. It is liable to flood. This is a further illustration of the highway implications of the scheme being assessed by way of a desk based analysis without evidence of how local roads operate in practice.	<p>flooding in the 1 percent annual probability event with climate change and is therefore highly unlikely to be affected by flooding.</p> <p>Flooding of Station Road at the White Mills Marina bridge is a separate, localised issue downstream of the BESS. The likelihood of a BESS incident occurring at the same time as road flooding is extremely low and falls beyond the design flood events considered in the FRA. Localised road flooding does not create a flood pathway to the BESS and does not alter the hydrology or flood risk conclusions for the Scheme.</p> <p>Section 5.12 of the <b>OCTMP Revision A [REP1-146]</b> summarises the proposed procedure in the event of an incident on a HGV route, including flooding.</p> <p>As part of the detailed Battery Safety Storage Management Plan (BSSMP) to be prepared prior to construction of the BESS, the Applicant will take into account the latest good practices for emergency response planning as well as battery system failure prevention and detection, consequence modelling and risk analysis, as guidance</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				continues to develop in the UK and around the world. The detailed BSSMP must be substantially in accordance with the <b>Outline BSSMP Revision A [REP1-143]</b> , and the relevant planning authority must consult with Northamptonshire Fire and Rescue Service and the Environment Agency before approving the detailed BSSMP, ensuring that the approved plan will be appropriate.
SGHS-046	Major Accidents and Disasters	BESS	There is ambiguity about the BESS Within the scheme. There is uncertainty about its' siting and specification which in turn serves to highlight the issue of public safety. Other issues have been identified in earlier section of this report and include the location of BESS Option A, is within Flood Zones 2 and 3; it is close to the RAMSAR and SPA designated areas which raise the sensitivity of the risks of pollution, and the location with the main access off Station Road and proximity to the river crossing at White Mills Bridge raises issues of the suitability of the access to accommodate the large vehicles necessary to transport BESS components to the site and the issue of accessibility in the event of an incident at the BESS. Regarding the detail of	<p>The Battery Energy Storage System is defined in <b>ES Chapter 4 Scheme Description [APP-041]</b>, <b>ES Chapter 10 Hydrology Flood Risk and Drainage Revision A [REP1-023]</b>, the <b>Flood Risk Assessment and Drainage Strategy Annex J Green Hill BESS [REP1-057]</b>, and the <b>OBSSMP Revision A [REP1-143]</b>. There is no ambiguity in its siting or specification for the purposes of assessment.</p> <p>Both BESS locations are within Flood Zone 1 as confirmed in <b>[REP1-023]</b> and <b>[REP1-057]</b>. No part of the BESS lies within Flood Zones 2 or 3 and flood modelling shows no risk in the one percent annual probability event with climate change or the point one percent event. The Scheme therefore avoids</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the site access, there is likely to be a disproportionate adverse impact on hedgerows and trees in order to provide points of access for large vehicles.	<p>any flood related pathway to the River Nene, the SPA or the Ramsar site.</p> <p>Pollution prevention measures for the BESS are secured through the impermeable lined drainage system, isolation valves and firewater containment approach set out in the oBSSMP <b>[REP1-143]</b> and FRA Annex J <b>[REP1-057]</b>. These measures prevent uncontrolled discharge and provide the necessary environmental safeguards.</p> <p>Matters relating to access design, vehicle movements and effects on hedgerows or trees fall within the transport and ecology assessments. These do not alter the Flood Zone 1 location of the BESS or the conclusions of the hydrology and flood risk assessment.</p>
SGHS-047	Major Accidents and Disasters	The BESS Specification Safety	<p>No detail of the BESS is provided because it is argued that technologies may change and the Applicant does not want to be tied to a design and specification at this point in time. Document SGHS/BESS.1 is a Statement by Professor Peter Dobson OBE.</p> <p>A Briefing Note prepared by Professor Dobson and his colleagues is</p>	<p>The <b>OBSSMP Revision A [REP1-143]</b> submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard.</p> <p>The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>SGHS/BESS.2. This focusses on safety issues arising at BESS and in particular arising from lithiumion batteries. The main points of the Note are:</p> <ul style="list-style-type: none"><li>• Lithium-ion BESS ("LiB"), are susceptible to "thermal runaway" which can lead to explosion, fire and the release of toxic emissions to air and ground;</li><li>• Firewater used for firefighting will be toxic and must be contained and properly disposed. Substantial environmental harm would result from firewater polluting adjoining land and watercourses;</li><li>• There is no clear legislative or regulatory provision for LiB;</li><li>• Hazardous Substances Consent ("HSC") is likely to be required for large scale LiB installations.</li></ul> <p>A Development Consent Order can include a direction regarding HSC, deeming it to be granted subject to conditions The draft DCO in this case does not include any such proposed direction.</p>	<p>Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.</p> <p>Section 5.5.9 of the <b>OBSSMP [REP1-143]</b> states:</p> <p>At the detailed design stage, a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>area will also be included. The emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.</p> <p>Volumes of toxic gases and heavy metal particulates that can be emitted during thermal runaway are often partially contained within the BESS enclosure (modules, racks, interior structure of BESS enclosure) and not vented into the external environment. The EPRI white paper "The Evolution of Battery Energy Storage Safety Codes and Standards (2023)" notes: 'While laboratory testing identifies toxic compounds that are released by burning Li ion batteries, these may be consumed internally, combusted, or may react to form other non-toxic compounds before being released to the environment. In recent events where batteries have burned in this fashion, fire services have announced that nearby air-quality monitoring has shown the air quality to be at safe levels.'</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Section 5.5.8 of the OBSSMP documents finds of the Plume Study commissioned to validate BESS site locations:</p> <p>The Plume Study contained <b>Chapter 16: Air Quality [APP-053]</b> of the ES (and associated Appendices) assesses the battery fire emission impact in ten worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area.</p> <p>The Plume Study considers all toxic emissions at the peak of a BESS fire, all emissions at receptor locations were below all relevant public health exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out).</p> <p>Section 6 of the OBSSMP outlines a comprehensive list of pre-construction requirements to ensure that BESS failure safety risks are minimised and hazards fully mitigated.</p> <p>Section 6.1.1 specifies:</p> <p>The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.</p> <p>Section 6.1.8 of the OBSSMP stipulates:</p> <p>Emergency Response Plan(s) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation NFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community.</p> <p>This is secured through Requirement 6 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-048	Major Accidents and Disasters	The BESS Specification Safety	Applicants must consult the HSA and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety. The HSE sets a consultation distance around every site with hazardous substances consent and notifies the relevant local planning authorities. The applicant should therefore consult the local planning authority at pre-application stage to identify whether its proposed site is within the consultation distance of any site with hazardous substances consent and, if so, should consult the HSE for its advice on locating the particular development on that site. Where a hazardous substance consent has been deemed to be granted, the developer is required to send the relevant HSA any information required by them for the purposes of a register.	<p>Please refer to the Applicant's response to SGHS-047. It is not typical for BESS installations to require hazardous substances consent, however this cannot be confirmed until the detailed design of the BESS has been carried out. The Secretary of State's Decision Letter granting development consent for the Sunnica Solar Project considers this matter, stating at paragraph 4.59:</p> <p>"The Secretary of State ... agrees that there is no requirement to obtain Hazardous Substance Consent in advance of receiving development consent. The Applicant is not requesting that the Secretary of State himself make a decision to deem hazardous substances consent within the DCO. The Secretary of State has been given no reason to believe that Hazardous Substances consent will not be granted by the HSE at the relevant time."</p> <p>"The Secretary of State ... is satisfied that the [Battery Fire Safety Management Plan] secured in Requirement 7 of the Order provides a satisfactory mechanism capable of addressing and adequately mitigating</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>all adverse impacts at the detailed design stage.”</p> <p>The <b>Draft DCO Revision A [REP1-008]</b> does not seek to disapply the hazardous substances regime or to deem a hazardous substances consent. The potential for the Scheme to interact with existing registered major hazards is assessed in <b>ES Chapter 23 Major Accidents and Disasters [APP-060]</b>.</p> <p>The potential interaction with utilities is discussed in Environmental Statement Chapter 24: Other Environmental Matters [, several embedded mitigation measures have been incorporated into the Scheme design to identify and manage utilities interactions as outlined in paragraphs 24.5.8 to 24.5.10. Where the proposed Cable Route Corridor crosses telecommunications and utilities, the cables will be laid so that the utilities are crossed at 90° where possible and will be suitably offset where running parallel and ground penetrating radar will be used before excavation to identify any unknown utilities.</p> <p>The Applicant acknowledges response from HSE at Scoping and Statutory</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Consultation; Cadent Gas will be engaged with to agree protective provisions in regard to their assets.</p> <p>With reference to HSE Ref #0306, operated by Coleman UK Plc at Holcot Land, Sywell, NN6 0BN, the Applicant notes that the Scheme lies outside the associated postcode area and therefore does not anticipate any interaction with this utility.</p>
SGHS-049	Major Accidents and Disasters	The BESS Specification Safety	<p>"Currently in the UK, ...., there are no established standards and regulations concerning the safety standards of these large BESS installations ...".</p> <p>There is 'guidance' but no statutory obligations on the Applicant. DEFRA amongst others is currently calling for a consultation on this issue. The dangers are very clear and any granting of permission without such Standards and Regulations in place is irresponsible and will make the applicants and the bodies that grant approval open to litigation. Do the developers have Insurance for the eventuality of a BESS failure?</p>	<p>Section 2.5 of the <b>OBSSMP Revision A [REP1-143]</b> outlines a comprehensive list of UK and international guidance, standards, codes, and best practice that Applicant has consulted and applied BESS safety design of the Scheme.</p>
SGHS-050	Major Accidents and Disasters	The BESS Specification Safety	<p>Of greater concern is that the BESS is close to the River Nene and to wetlands and SSSI, the Ramsar site and SPA sites downstream and</p>	<p>The hydrology assessment confirms that an incident at the BESS cannot create a pathway for contaminated water to reach the River Nene,</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>noxious fumes could contaminate the surrounding farmlands and nesting sites of passing flocks. This is a very environmentally sensitive area and in the event of a fire, the firewater must be contained properly and disposed of safely after removal of contaminants. "Fluorinated compounds in the fumes and the firewater are toxic – even in small amounts – and have a long lifetime in the environment, which could last for decades." [See Briefing Note 2025 <i>ibid.</i>] The Applicant does not seem to appreciate the gravity of such issues and the planning authority and the Government need to be aware of this.</p>	<p>wetlands or designated sites downstream. As set out in <b>Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]</b>, the BESS compound operates as a sealed and valve closed drainage system during any incident. All firewater, cooling water and rainfall within the compound is fully contained on site within the lined drainage loop and there is no discharge until the water has been tested and removed by tanker for appropriate off site treatment.</p> <p>The BESS is located in Flood Zone 1 and is not affected by flooding from the River Nene. Flood events therefore cannot mobilise contaminants or transport water from the compound to downstream habitats. These engineered containment measures remove the hydrological pathway and ensure that firewater or contaminated runoff cannot reach the river or designated sites.</p> <p>The Applicant has committed to only selecting a BESS design that has undertaken Large Scale Fire Testing (LSFT) which demonstrates the impact of a BESS fire when the complete battery system burns out.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Section 5.5.9 of the <b>OBSSMP Revision A [REP1-143]</b> states:</p> <p>At the detailed design stage, a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.</p> <p>Volumes of toxic gases and heavy metal particulates that can be emitted during thermal runaway are often partially contained within the BESS enclosure (modules, racks, interior structure of BESS enclosure) and not vented into the external environment.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>The EPRI white paper “The Evolution of Battery Energy Storage Safety Codes and Standards (2023)” notes: ‘While laboratory testing identifies toxic compounds that are released by burning Li ion batteries, these may be consumed internally, combusted, or may react to form other non-toxic compounds before being released to the environment. In recent events where batteries have burned in this fashion, fire services have announced that nearby air-quality monitoring has shown the air quality to be at safe levels.’</p> <p>Section 5.3.2 of the OBSSMP stipulates:</p> <ul style="list-style-type: none"><li>• Site and BESS design principles and ERP content will ensure that the NFRS are expected to employ a defensive strategy i.e. only boundary cooling should be employed for cooling of adjacent BESS or associated supporting equipment, this ensures that environmental pollution risks are minimised. Boundary cooling typically involves firefighters directing</li></ul>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. NFCC guidance states: "If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly." A BESS design which may require direct NFRS firefighting engagement tactics will not be selected for this facility</p> <ul style="list-style-type: none"><li>• If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated, water runoff is likely to contain higher levels of pollutants compared to water used for external boundary cooling of BESS and ESS equipment. All process</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				water used in the system shall be prevented from contaminating potable water sources in accordance with local regulations through the use of check valves or other means as part of the system design. Pollution analysis will be conducted before removing and treating offsite.



## 5.7 Walgrave Parish Council

**Table 5.7: REP1-190**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WaPC-001	General Matters	Overall comments	Please find attached comments from Walgrave Parish Council. When submitting comments to meet the August deadline, it was stated that additional comments could be submitted at a later date. Walgrave Parish Council have now had the opportunity to conduct a Village Survey and have produced a response in line with the outcomes of that.	The Applicant notes this comment.
WaPC-002	Landscape and Visual Impact	Visual Impact	<p><b>Size and Scale Sites A and A2</b></p> <p>The proposed development spans a substantial area, transforming a large expanse of rural agricultural land into an industrial-scale solar power installation. This development is too large for the landscape and context in which it is proposed. The surrounding area is rural countryside and rural residential, the development would dominate the landscape which cannot absorb a large-scale solar development.</p> <p><b>Visual Impact</b></p> <p>The vast physical footprint of this proposal would significantly alter open views due to the huge scale of the proposed development and the proximity of solar panels to the road. Site A2 would cause a</p>	The Scheme comprises a series of independent areas of land or Sites set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>major visual impact along Kettering Road, one of the main approaches into Walgrave. This currently open, rural vista will be replaced by a prominent, industrial-scale installation, which will dominate the landscape and detract from the village's countryside setting. Site A will similarly cause a significant visual intrusion along Newlands Road, altering key views in and out of the village and permanently impacting the rural character of the area. The proposed development does not comply with key National and local policies aimed at preserving the rural character and visual appeal of the open countryside. The size and scale of the proposed power installation, particularly the visual impact of Sites A and A2 would lead to irreversible harm to the landscape.</p>	<p>The discrete areas of land in the Scheme are placed so far apart that the Scheme will not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape.</p> <p>The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.</p> <p>This 'network of sites' approach demonstrates good design by allowing for a fine-tuning approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing, and provide enhanced landscaping and vegetation. This demonstrates how</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>the Scheme is sensitive and responsive to place.</p> <p>The ES <b>Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-045]</b> includes an assessment of the Cumulative Effects of the Scheme based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views) visibility.</p> <p>The LVIA acknowledges that locally prior to the establishment of the Embedded Mitigation, there would be an immediate change to the character of the individual Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, these effects would be limited to the site itself and its immediate setting. As planting matures it would begin to provide enclosure to the individual Sites, screening and providing containment to the Scheme allowing it to become more absorbed into the receiving landscape. However, given the scale of the proposals, there would be an appreciation of the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Scheme within its immediate surroundings which would be notably different from the character of the surrounding arable countryside. The LVIA recognises that for users of Kettering Road (TR033), until the proposed mitigation planting had established, there would be Significant Adverse effects to users of this section of road on the approach into and out of Walgrave. During construction, users would have views of construction activity within rising landform in fields A2F2, A2F3 and A2F4 seen at close proximity and partially filtered by existing intervening vegetation, as well as direct views of construction activity within rising landform in fields A2F2, A2F3 and A2F4. Alongside Kettering Road, the proposed landscape mitigation includes for proposed secondary native species rich hedgerow with densely spaced native hedgerow trees and a 10m wide belt of instant screening comprising new native tree and scrub planting. Other than the instant screening, the proposed mitigation planting would have a limited effect initially. However, the instant screening would help to screen and</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>soften views into the adjacent A.2 fields. By Year 15, mitigation planting would screen views into and across Site. Filtered views of infrastructure would be likely in wintertime, but with the array seen at distance and broken up by the proposed mitigation planting.</p> <p>Turning to effects on users of Newland Road (TR100), The LVIA recognises that, until the proposed mitigation planting has established, there would be Significant Adverse effects to road users. Newland Road passes through Site A, and in places this would allow for direct views of proposals with the array being more prominent to the east of the road. Mitigation proposals include for the existing roadside hedgerows to be reinforced with irregularly spaced native tree planting and other sections to be reinforced with densely spaced native tree Planting.</p>
WaPC-003	Agriculture and Soils	Best and Most Versatile	The National Planning Policy Framework indicates giving substantial weight to the value of using suitable brownfield land and not prime agricultural land. The fields being proposed are prime agricultural land.	Please see response to SGHS-002.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WaPC-004	Ecology and Biodiversity	Habitat loss	The large-scale loss of greenfield or agricultural land for such a development raises concerns regarding local biodiversity. Development may result in substantial habitat loss for local wildlife. The area includes hedgerows, mature fields and open farmland, all of which support a wide range of species. The installation of solar panels and associated infrastructure will disrupt wildlife corridors. Walgrave's close proximity to Pitsford Reservoir - a designated nature reserve and important habitat for migratory and resident bird species, places the village within a key flight corridor. The proposed development risks disrupting this.	<p>The habitat losses and gains as a result of the proposed development have been assessed, and are available in <b>Environmental Statement Appendix 9.13 Biodiversity Net Gain Assessment Revision A [REP1-043]</b>. This assessment concludes that significant net gains in habitat, hedgerow and watercourse units would be delivered through the Scheme, far in excess of the 10% net gain which is mandatory for most planning applications. Details of habitats which would be delivered through the Scheme post-construction can be found in the <b>OLEMP Revision A [REP1-137]</b>.</p> <p>An assessment of effects in relation to Pitsford Reservoir Site of Special Scientific Interest (SSSI) can be found on pages 131-132 of the <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-033]</b>. This assessment concludes that no significant effects on this SSSI during the construction or operational phases are anticipated. Impacts on breeding and overwintering bird</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				species are also set out within this chapter.
WaPC-005	Transport and Access Socio-economics	Newlands Road as a designated Quiet Lane	This narrow single-track road is used by residents for recreational purposes, including walking, cycling and horse riding. It is not designed to accommodate construction vehicles, which will inevitably use this route. Please refer to the Highways department comments on planning application DA2025/0886/MAO on West Northants planning portal, which highlights highway safety along this road. Any increase in volume of traffic on this road would exacerbate the existing pressure on a road that already struggles to cope with current levels of use.	Please refer to the <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> response to Q20.0.11. Construction traffic will not route along Newland Road to access Green Hill A. The response sets out the proposed use and management of the crossing point (Crossings A-1(E) and A-1(W)) over Newland Road during the construction phase. Further information about the HGV construction routes for the Scheme is available in <b>8.2.1 Transport and Access Routes Supporting Document [REP1-167]</b> .
WaPC-006	Development Consent Order Other Environmental Matters	Decommissioning Waste and recycling	This stage raises several significant concerns which must be fully addressed. It is anticipated that solar panels will require replacement at least once during the operational lifespan of the power installation, (this replacement will result in a renewed period of increased traffic to and from the site). In the event that the solar farm becomes no longer economically viable, it is unclear what means are in place to ensure full decommissioning.	Please refer to response to SBMP-005 of the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to decommissioning.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Without enforceable conditions, there is a real risk that the infrastructure could be abandoned, leaving both physical and environmental degradation behind. There must be a clear and legally binding plan to return the land to its original agricultural condition. This includes the full removal of solar panels, and any other infrastructure introduced to the site. It should be clearly stated:</p> <ul style="list-style-type: none"><li>• Who bears responsibility for removing the panels and associated infrastructure</li><li>• Who is obligated to restore the land back to a viable agricultural state, and within what timeframe?</li><li>• What financial security or bond is in place to ensure that decommissioning and land restoration will occur, regardless of the financial standing of the operating company at the time?</li></ul> <p>Furthermore, the recyclability and disposal of solar panels is an increasingly pressing issue. Clear commitments and acknowledgement of which parties are responsible must be provided regarding how panels will be handled at the end of their life, specifically, for ensuring that</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			disposal is carried out safely and in an environmentally responsible manner.	
WaPC-007	Major accidents and disasters	BESS	Emergency response protocols for BESS incidents are still under development, raising serious safety concerns. BESS fires cannot be extinguished with water and are typically left to burn out, increasing the risk of toxic chemical release, contaminated runoff into nearby protected areas, and damage to local ecosystems. Given the proximity to environmentally sensitive areas, these risks must be fully addressed.	<p>The <b>OBSSMP Revision A [REP1-143]</b> submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard.</p> <p>The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Section 5.5.9 of the <b>OBSSMP Revision A [REP1-143]</b> states:</p> <p>At the detailed design stage, a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.</p> <p>Volumes of toxic gases and heavy metal particulates that can be emitted during thermal runaway are often partially contained within the BESS enclosure (modules, racks, interior structure of BESS enclosure)</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>and not vented into the external environment. The EPRI white paper "The Evolution of Battery Energy Storage Safety Codes and Standards (2023)" notes: 'While laboratory testing identifies toxic compounds that are released by burning Li ion batteries, these may be consumed internally, combusted, or may react to form other non-toxic compounds before being released to the environment. In recent events where batteries have burned in this fashion, fire services have announced that nearby air-quality monitoring has shown the air quality to be at safe levels.'</p> <p>Section 5.5.8 of the OBSSMP documents finds of the Plume Study commissioned to validate BESS site locations:</p> <p>The Plume Study contained <b>Chapter 16: Air Quality [APP-053]</b> of the ES (and associated Appendices) assesses the battery fire emission impact in ten worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>The Plume Study considers all toxic emissions at the peak of a BESS fire, all emissions at receptor locations were below all relevant public health exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out).</p> <p>ERPs can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.</p> <p>Section 5.4.4 of the OBSSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including:</p> <p>“Emergency procedures for all credible hazards and risks, including</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</p> <p>Section 6 of the OBSSMP outlines a comprehensive list of pre-construction requirements to ensure that BESS failure safety risks are minimised and hazards fully mitigated.</p> <p>Section 6.1.1 specifies:</p> <p>The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.</p> <p>Section 6.1.8 of the OBSSMP stipulates:</p> <p>Emergency Response Plan(s) covering construction, operation and decommissioning phases will be developed once a construction team,</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>and an operator have been appointed. These plans will be developed in consultation NFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community.</p> <p>This is secured by Requirement 6 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p>
WaPC-008	Historic Environment	Heritage assets	<p>It should be noted that the proposed development at Site A2 lies in close proximity to a designated Scheduled Monument. The site includes the earthwork remains of the original medieval village, which are protected by English Heritage. This area, known as Atterbury's Field, holds significant historical and archaeological value, and any development in its vicinity must take into account the potential impact on this nationally important heritage asset.</p>	<p>The Applicant notes the location of the Scheduled Abandoned areas of Walgrave Medieval village (NHLE: 1418583) in relation to the Scheme. As detailed in Appendix 1 of <b>Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> the Scheduled Monument was scoped out of assessment.</p> <p><b>Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]</b> was used during consultation and assets scoped out of assessment are considered to be</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				agreed with the Historic England and the Local Planning Authorities.
WaPC-009	Development Consent Order	Community benefits	Clear confirmation of community benefit must be addressed should this proposal be granted. There is currently no mention if the fund will be available, how it will be available and how it will be payable to the community for the duration of the life of the solar farm	Please refer to response to SBMP-007 of the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to Applicant commitment to community benefits.
WaPC-010	Energy Need and Policy	Planning Policy	National Planning Policy Framework 2023: The proposal conflicts with this policy. Paragraph 174 states that planning decisions should protect and enhance valued landscapes, recognising the intrinsic character and beauty of the countryside. Paragraph 180 (b) states that development resulting in the loss or deterioration of irreplaceable habitats (including characteristic landscapes) should be refused if significant harm cannot be avoided or mitigated. Paragraph 155 supports renewable energy projects but requires that they are appropriately sited and designed to minimise impacts, including on landscape character.	Please refer to the following responses NNC-004, NNC-005 and NNC-012 within the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in regard to the landscape assessment.



## 5.8 Wellingborough Town Council

**Table 5.8: REP1-191**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WTC-001	Socio-Economics, Tourism and Recreation	International Waendel Walk Map sections of the report have been included	<p>Please find attached the map sections that we are willing to have available for transparency as these are the routes that would be directly affected by the proposed works.</p> <p>The routes team have agreed that the follow approach would be suitable for you to take regarding the maps.</p> <p>We can publish the maps and apply the following actions. Stitch the maps to the bottom of the text provided in your email, which will hopefully provide clarity to readers that the maps are provisional and subject to change. We can also add clarity to the description on the website i.e "Written Representation including provisional map routes". This will allow us to make the material available to all involved in the examination and therefore allow the ExA to take it into consideration in the Examination.</p>	<p>With specific regards to the what the Applicant is doing to ensure the minimisation of impacts to the International Waendel Walk, please refer to the <b>Applicant's Response to ExA First Written Questions Q19.0.1-19.0.3 [REP1-163]</b>. The Applicant has furthermore been in direct contact with Wellingborough Town Council as the event organisers to ensure protective mitigation measures during construction are satisfactorily agreed. These are secured through the <b>OCEMP Revision A [REP1-131]</b> by Requirement 13 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p>



## 5.9 Wellingborough Walks Action Group Ltd

**Table 5.9: REP1-299**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WWAG-001	General matters Arboriculture	Mitigation Proposals	<p>I write on behalf of Wellingborough Walks Action Group re-Greenhill Solar application EN010170. With the following comments:</p> <p>The planned mitigations seem positive as are the Applicant's commitment to protect ancient, veteran and category A trees. However, given the very small number of trees of these trees onsite, and the large number of category B, C and U trees of good quality present, it is still likely that a significant loss of healthy trees across the site will occur.</p>	<p>The Applicant has made a general commitment to try to avoid the removal of all trees within the Order Limits as stated in paragraph 7.6.1 of the <b>Environmental Statement Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b>.</p> <p>Mitigation measures including micrositing around trees within the Cable Route Corridor, use of Horizontal Directional Drilling (HDD) within the Cable Route Corridor and protection of trees with perimeter fencing and/or tree protection fencing have all been committed to within the aforementioned Outline Arboricultural Method Statement to ensure tree removal is avoided wherever possible.</p> <p>The Applicant would like to clarify that lower category trees, particularly Category U trees, have often been graded as a lower category due to their poor quality and short estimated life expectancy. Category U trees are estimated to have less than 10 years life expectancy. Figure 7.1 in the aforementioned Outline Arboricultural Method Statement therefore sets out the principal of targeting lower</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>quality trees for removal over high quality trees where tree removal is unavoidable (for example where micrositing, HDD or another means of tree avoidance/mitigation) is not possible.</p> <p>Lastly, the possible tree removals listed in the Arboricultural Impact Assessment represent the 'worst case scenario' as stated in paragraph 5.4.5 of the report. It is considered highly likely that many of the trees listed in Table 5.3 of the Arboricultural Impact Assessment (pertaining to possible tree removals within the Cable Route Corridor) can be avoided during installation of the cables through micro-siting as detailed in the Outline Arboricultural Method Statement.</p>
WWAG-002	Arboriculture	Cable Corridor	The process that will most impact nonancient/veteran trees is work on the cable corridors. We had expected access to fields to have the highest impact, but from analysis it looks like over 80% of possible tree losses will come as a result of cable corridor creation. This is surprising given the many mitigation techniques the Applicant is committing to use to safeguard trees, such as micro-siting, HDD trenchless digging and using the 50m corridors to 'avoid' and protect trees. The Applicant is committed to use these techniques for ancient, and	Whilst the Applicant concurs that tree impacts are most concentrated within the Cable Route Corridor, the Applicant would like to note that a 'worst case' assessment of tree removal within the Cable Route Corridor has been made. All trees (except veteran trees and Category A trees of high quality) that bisect the Cable Route Corridor have been precautionarily listed as possibly requiring removal for the Scheme as detailed design has not yet taken place and therefore the exact location of the trench for the cabling and the associated working corridor is



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			category A trees, but less so for category, B, C and U trees.	unknown at this stage. This assessment approach and caveat is shown in paragraph 3.1.26 of the <b>Environmental Statement Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b> . As such, many of the trees listed as possibly requiring removal in the Cable Route Corridor will likely be retained with the preference for tree retention aimed at retaining trees of higher quality, value and life expectancy over trees of lower quality, value and life expectancy.
WWAG-003	Arboriculture	Likely Impacts on Site Trees	From our analysis it appears that 2,665 trees are on site (974 individual and 1,690 trees in 169 groups, assuming have of 10 trees per group) (ref APP 171 - point 4.2, p23), and roughly 368 healthy mainly cat B and C trees may need to be felled (78 individual, and 290 in 29 groups) (ref - APP 056, table 19.11, p37). This equates to 14% of all trees. And when further potential impacts noted in table 19.12, on p39 of APP 056, are added, ie. root and canopy impacts, the trees affected rises to 22% of all trees, a staggering amount. The Applicant mentions these are 'worst case scenario', but they remain worrying high. Northamptonshire already has one of the lower tree canopy coverages in England	The number of trees within the Site is likely to be far greater than those estimated in this representation. The number of trees recorded within the tree survey (i.e. 974 individual trees, 169 groups of trees, 8 woodlands and 8 hedgerows) represent only a subset of the trees within the Order Limits as for the solar PV areas, only the largest tree on each boundary was recorded in addition to all veteran and ancient trees. As such, most trees within the solar PV sites were not recorded and those that were recorded within the solar PV sites were more likely to be the larger Category A (high quality) or Category B (moderate quality) trees. Similarly, not only are the number of trees on Site far greater than those estimated in the representation



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			at 10%, (England ave is 12.8%), thus we can ill-afford to lose this amount. Clearly, if the Applicant decides to use mitigation measures for the cable corridor to protect more category B and C trees, the losses could be significantly lower.	<p>but the anticipated tree losses are likely to be much smaller as a 'worst-case' assessment of tree loss within the cable route corridor has been made as detailed in response to WWAG-002.</p> <p>A robust Outline Arboricultural Method Statement securing measures to both avoid and mitigate tree impacts has been provided by the Applicant in <b>Environmental Statement Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b>.</p>
WWAG-004	Arboriculture Climate	Felling Lower Category Trees and Climate Emergency	We note the commitment that if trees have to be felled they plan to target younger, lower category trees first (see APP 171). However, given the climate emergency all trees are valuable and need to be safeguarded. With UK Government's net zero target of 2050, new trees planted now will only having 25 years of growth by then, and will provide much lower CO2e storage benefit compared to trees already growing who, by then will be making a more significant CO2e contribution, as well as continuing to provide habitats and sustain bio-diversity. And of course category B, C and U trees now, if retained, will be our category A and B trees of the future. Clearly, the main reason for potentially	Tree removals will be avoided as far as possible with a commitment from the Applicant to not remove Category A (high quality) trees or veteran or ancient trees within the Cable Route Corridor. The majority of possible tree removals are associated with the Cable Route corridor whereby techniques such as micrositeing around trees and Horizontal Directional Drilling underneath trees will be utilised to avoid tree removals as far as practicable. These mitigation measures are secured in the <b>Environmental Statement Appendix 19.2 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b> and <b>OCEMP Revision A [REP1-131]</b> .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			allowing this development is to reduce CO2e emissions nationally through green energy generation. It feels perverse that the local area may suffer and become more depleted to enable this, as presently there appears few benefits to local communities of this scheme.	Significant tree planting and woodland planting, as well as maintenance measures, are proposed within the <b>OLEMP Revision A [REP1-137]</b> .  <b>ES Chapter 7: Climate Change [APP-044]</b> has assessed the impact of GHG emissions and savings arising from a lifecycle assessment of the Scheme on the climate over its lifetime (See section 7.8).
WWAG-005	Arboriculture	Depleting Ash Trees	We note that the highest proportion of trees across the scheme is ASH (57%) - (APP 171, point 4.2.5, p 24). It's fair to assume then that Ash trees will also make up the largest amount of trees that could be affected by felling. However, with ash dieback disease causing significant losses in this area, felling healthy ash trees does not seem a sensible. Particularly since there is increasing evidence that ash dieback seems to cause more problems to new/young. It seems, therefore, taking steps to protect older ash trees is vital regardless of category.	There is no specific mitigation included for the preferential retention of any one particular tree species. Instead, the <b>Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b> includes a hierarchy of preference for tree retention that is based on first whether the tree is ancient/veteran or protected by a Tree Preservation Order, such trees are listed in Figure 7.1 of the <b>Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b> as 'must not be removed'. Then Category A, B, C and U trees are listed, with increasing preference for removal if unavoidable during construction. As such, Figure 7.1 aims to avoid removing trees of higher quality and longer life expectancy generally.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WWAG-006	Arboriculture	Draft DCO Tree Preservation Status	<p>Given the experience of our group and residents who fought to save TPO'd trees on 'The Walks' in Wellingborough, we are concerned to see (OAMS part of APP 171, points 7.6.5 and 7.6.6) that the DCO, if agreed, will confer 'deemed consent' on the Applicant to 'undertake works to TPO trees without first having to apply for permission to the local planning authority. For local campaigners any sense that a DCO would give the Applicant a 'free hand' to decide lop or fell TPO trees that they may feel are 'in the way of construction', is concerning. As the judgement in the case of WWAG v NNC in the High Court in May 2024 concluded, no felling was automatically permitted under a 'planning permission' if a reasonable alternative to felling could be found. Given the many mitigation measures and techniques outlined by the Applicant in APP 171, including the commitment not to fell or lop TPO trees themselves, we would not expect to see any TPO trees on the scheme being affected in this way</p>	<p>The <b>Draft DCO Revision A [REP1-008]</b> does not provide a general power to carry out works to trees protected by tree preservation orders (TPOs). Article 40 (felling or lopping of trees and removal of hedgerows) provides that the Applicant may carry out works to trees and hedgerows where it <i>"reasonably believes it to be necessary to do so to prevent the tree or shrub from— (a) obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; (b) constituting a danger to persons using the authorised development; or (c) obstructing or interfering with the passage of construction vehicles to the extent necessary for the purposes of constructing the authorised development.</i> This power is limited by article 41 (trees subject to tree preservation orders) which entitles the Applicant to carry out works to trees protected by a TPO only where the TPO was made after the date of the DCO. This ensures that a subsequent issue of a TPO does not constitute an impediment to the implementation of the Scheme. The draft DCO therefore does not authorise any works to trees subject to existing TPOs.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				In respect of tree works generally, the <b>Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b> states in paragraph 7.6.7 that “advice from the ACoW will be sought to confirm whether the works are necessary and whether any alternative measures can be employed to avoid undertaking works to protected trees”. This mitigation will help to ensure that works to TPO'd trees are avoided and/or minimised wherever possible.
WWAG-007	Arboriculture Landscape and Visual Impacts	Concerns about extensive hedgerow removal	Having noticed the extent of hedgerows removal the Applicant is planning (Draft DCO schedule 12, p 97 to 126) we are concerned about the likelihood of significant loss of biodiversity, habitat and food source for numerous species, as well as the loss of extensive hedgerows, some of which will have been part of this landscape for many years. The fact that the Applicant intends to replace some hedgerows will not compensate for the loss of these natural assets, which many bats, hares, birds, monk-jack deer, and other mammals rely on for shelter, habitat and food. The Applicant's plans to 'rebuild' some hedges, and plant new ones is to be welcomed, but the extent of removal seems considerable. Could more be done to save them. The loss of carbon	The <b>Draft DCO Revision A [REP1-008]</b> provides the Applicant with the power to remove hedgerows within the Order Limits. The extent of the removal is controlled by the <b>OLEMP Revision A [REP1-137]</b> , which sets out at section 1.2 the approach to construction and maintenance access gaps at hedgerows. The <b>OEPMS Revision A [REP1-140]</b> , Method Statement 6, also provides mitigation to ensure hedgerow removal is reduced to a minimum.  Hedgerow loss has been minimised by the Scheme, and all losses of hedgerow associated with the Cable Corridor are temporary and will be reinstated. Overall, a substantial net gain in the extent of hedgerow will be realised, alongside in-fill planting and sensitive management of



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			storage as a result of hedgerow loss should also not be underestimated, as well as the role they play in holding the landscape together, holding on to water and helping reduce the likelihood of flooding, which is a significant issue across much of the landscape of this scheme. And whilst some replacement planting is planned, regrowth timescales will take many years, leaving the land less able to support communities (human or otherwise) to cope with increased flood risk.	existing hedgerows. As detailed in <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-033]</b> , following their establishment, it is anticipated that the Scheme will result in the creation of approximately 15.9km of new hedgerow, and approximately 7.9km of lines of trees. Details of hedgerow losses and gains are also provided within <b>Environmental Statement Appendix 9.13: Biodiversity Net Gain Assessment Revision A [REP1-043]</b> .  Broader impacts on ecology and biodiversity are discussed in detail within the <b>Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-033]</b> .
WWAG-008	Arboriculture Consent Order	Keeping to Mitigation Commitments	The mitigations planned by the Applicant to protect trees throughout the life of the scheme are extensive. However, we are concerned about what protections will remain if the Applicant decides to sell the scheme after a few years. Northants has experienced considerable development in recent years but few of the many commitments made by developers made during this time (via section 106 agreements) seem to have transpired. What protections does the Applicant intend to put in place over the life of their scheme to ensure that all tree mitigations	<b>Chapter 27: Commitments Register [APP-064]</b> includes an overview of all mitigation measures and their corresponding securing mechanisms.  Several mitigation plans will be implemented and adhered to throughout the lifetime of the Scheme as secured in Schedule 2 of the <b>Draft DCO Revision A [REP1-008]</b> . This includes for example: <ul style="list-style-type: none"> <li>Outline Landscape and Ecological Management Plan;</li> </ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			remain regardless of who owns the scheme moving forward. And what safeguards will the government put in place to help ensure commitments in the Applicant's Commitment Register (APP 064) will be enforced.	<ul style="list-style-type: none"><li>• Outline Ecological Protection and Mitigation Strategy; and</li><li>• Outline Operational Environmental Management Plan.</li></ul> <p>One or more detailed management plans will be prepared by the appointed Contractor(s) in accordance with the outline submitted as part of the Application, as secured by Requirement of the DCO and will be submitted for approval by the relevant local planning authority or authorities in advance of starting the relevant phase of works.</p> <p>The requirements of the DCO will control the construction, operation and decommissioning of approved works.</p> <p>It is a criminal offence to not comply with the Requirements of the DCO, and responsibility for compliance rests with the "undertaker" as defined in the <b>Draft DCO Revision A [REP1-008]</b>. This ensures that the mitigations are safeguarded for the duration of the Scheme, irrespective of the identity of the owner. It should also be noted that, under article 37 of the <b>Draft DCO Revision A [REP1-008]</b>, the consent of the Secretary of State is required in order to transfer the DCO to another party.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WWAG-009	Community Benefits	Community Benefits	<p>There is a clear omission of any commitment by the Applicant to deliver direct benefits to the people, businesses and communities that will be affected by this scheme if given the go ahead. I have advocated for renewable energy over many decades and I find it ironic to be challenging this scheme in my area. However, it presently has few of the collective benefits that I imagined would arrive with the delivery of solar power on our doorstep. At the top of the list would be the provision of affordable electricity for people/communities living nearby, or at least a community fund to help improve the energy efficiency of local homes. Also maybe an opportunity for local residents to buy into the scheme, as other generators are doing. It saddens me that none of this is on offer and, at present, little is even mentioned about a section 106 agreement.</p> <p>We request the question of the community benefit of this scheme be added by the ExA's list of 'Initial Assessment Principles and Areas'. Given this is Nationally Strategic Infrastructure which communities across the UK are expected to 'host', it seems reasonable Government should assess the Applicant's commitment to ensure</p>	<p>Chapter 10 of the <b>Statement of Need [APP-556]</b> provides evidence that solar facilities are already among the cheapest form of electricity generation in the UK and the development of more solar schemes will help to reduce the cost of wholesale electricity. Because the Scheme proposes to connect to the National Electricity Transmission System, the energy it generates will be available to power homes, vehicles, offices, shops, and factories, both locally and nationally. The carbon and cost savings arising from the Scheme will therefore be available to the benefit of all consumers, both nationally and locally.</p> <p>Please also refer to the response to NNC-085 in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in respect of the proposed community benefit fund.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			meaningful benefit is received by communities living nearby. It feels perverse that if this scheme goes ahead and delivers 500MW of electricity, that not even a 1p per kWh saving in electricity costs would benefit people living nearby. This scheme surely provides an opportunity for this to change. It would be good if an assessment of local benefit can be added to the many elements ExAs are exploring in this application	



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

### 6.1 Shena Howell

Table 6.1: [REP1-293](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SHo-001	Socio-economics	Public Right of Way Tourism	<p>I would like to raise the issue of The Waendel Walk. Wellingborough is the only town to host such an International Event, and its the only event in the UK to be a member of the IML. It has been in existence for 44 years and attracts more than 3000 visitors each year from around the Globe benefitting many local businesses. The walks take place over a weekend and the Saturday walks will be SEVERELY COMPROMISED if the planned development works were to go ahead, particularly in the Countryside between Easton Maudit and Grendon and Bozeat and Grendon.</p> <p>Looking at the routes, clearly it is the Saturday that will be impacted the most by the development both during the construction and operational phases. (The construction phase lasting for 24 months, the operational phase 60 years).</p> <p>The red route on map 5 starting from the well trodden route across the open fields from Bozeat to Grendon, will, as plans stand currently, pass through solar installations in fields FF18/FF19/FF11 and the corner of FF10. This is also the sight line from the Grade I</p>	<p>With specific regards to the what the Applicant is doing to ensure the minimisation of impacts to the International Waendel Walk, please refer to the <b>Applicant's Response to ExA First Written Questions Q19.0.1-19.0.3 [REP1-163]</b>. The Applicant has furthermore been in direct contact with Wellingborough Town Council as the event organisers to ensure protective mitigation measures during construction are satisfactorily agreed. These are secured through the <b>OCEMP Revision A [REP1-131]</b> by Requirement 13 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>The Applicant has assessed all areas where the International Waendel Walk routes interact with the Scheme at Green Hill F, Green Hill BESS (including along Station Road), the River Nene footpath NN TC 17 by White Mills Marina, and Mill Lane/byway open to all traffic NN TC 14 to the east of Earls Barton. Specific assessments of impacts in each location are set out in <b>ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Church of St Mary Bozeat to the Grade II* Church of St Mary Grendon!</p> <p>The applicant has stated that the corridors around the PRowS will be secured with high fencing, CCTV cameras and measure some 30m wide (after planting), this will clearly not lend itself to International walkers admiring our open rolling fields and hedgerows. In addition, The riverside part of the route to the West of the hump back bridge by White Mills Marina will also pass through what is currently identified as a very wide area of cable trenching? together with the bridge itself being identified as the main HGV route for Grendon BESS development (Working 6 days a week, including Saturdays for 24 months). The route will be further impacted by the proposed 50m wide cable trench route running North to South cutting across the Doddington Road adjacent to Brimshill spinney.and Glebe Farm.</p> <p>The yellow route outlined on map 6 will also be adversely affected by the proposed 50m wide cable trench route running North to South cutting across the Doddington Road adjacent to Brimshill spinney.and Glebe Farm. In addition, the route along Station Road Grendon towards the EB bends and hump back bridge by the Marina will be marred by the 50m wide cable trenching route, destruction of hedgerows along the road and construction traffic 6 days a week for 24 months. The route then passes the hump</p>	<p>The exact location of the cable circuits within the 50m Cable Route Corridor will be determined at the detailed design stage.</p> <p>Please refer to responses to MHo-005 and SGHS-064 in <b>The Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to heritage considerations for Green Hill F.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>back bridge mentioned previously and before it enters Station Road Earls Barton side has to cross the 50m wide cable route once more.</p> <p>The blue route map 4 is the least impacted, but again will be impacted by the proposed 50m wide cable trench route running North to South cutting across the Doddington Road adjacent to Brimshill spinney and Glebe Farm. In addition, the bottom of Mill Lane to the North of the A45, will again need to cross the 50m wide cable trenching.</p>	





## 6.2 Smith Family and PS Smith & Son

**Table 6.2:** [REP1-296](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SMI-001	Cable route	Location	<p>We write to express their ongoing concerns regarding the proposed cable routing for the Greenhill Solar Farm project, which falls along the eastern boundary of their land. Poplars Farm and West Farm is a small arable family farm, which is of a scale where diversification is essential to ensure that the farm is viable. The farm has been identified as a potentially suitable site for Biodiversity Net Gain off-setting, and terms are currently being discussed with a registered BNG provider to enhance the farm with woodland planting and scrub conversion. This is shown indicatively on the plan below.</p> <p>The current planned cable route with accompanying restrictions, including limitations on tree planting, will pose a significant risk to the successful implementation of the project, which could undermine the sustainability goals and planned biodiversity improvements.</p> <p>In addition, the clients have an existing agreement with the Freshwater Habitats Trust, which has funded the creation of three ponds on the farm. The proposed cable route would directly impact upon at least one of these ponds, threatening the habitats and aquatic eco systems that have been established as part of this conservation effort. This would not only breach the applicant's commitment to the Trust but also jeopardise the environmental</p>	<p>The Applicant has been in communication with this respondent in respect of their private interest recorded in the <b>Book of Reference Revision B [REP1-012]</b>.</p> <p>The Applicant will engage in further discussions with the landowner to understand the scope of the biodiversity net gain offsetting plans and the potential overlap with the Scheme.</p> <p>Alternative cable routes have been considered throughout the design evolution process. The land to the east of the proposed Cable Route Corridor currently has tree planting and so this option was not progressed as it would result in greater environmental effects than the proposed route at the time of initial assessment. The Applicant understands that the BNG proposals are in a very early stage.</p> <p>With regard to the three ponds on the farm; the Applicant has committed to using a trenchless crossing technique such as Horizontal Directional Drilling (HDD) rather than by open trenching during cable construction.</p> <p>This approach avoids disruption to the ponds and ecological impacts when being crossed.</p> <p>The design parameters of the HDD activities are set out in the <b>CDPP Revision A [REP1-151]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>benefits that these ponds provide. The affected area is clearly shown on the aerial photograph below.</p> <p>We can see no reason why the cable could not be routed onto the adjoining land to the east, which is currently used as bare grassland grazing. Such alternative route would minimise environmental disruption and respect our clients' existing ecological commitments.</p>	<p>The <b>OEPMS Revision A [REP1-139]</b> and <b>OCEMP Revision A [REP1-131]</b> will provide precautionary working methods surrounding the installation of the cables and the minimisation of risks associated with HDD. This would include visual monitoring for discharge of sediments, monitoring for vibrations, suitable depth settings and precautionary siting of entry and exit pits.</p>



### 6.3 Trescella Elderton & Ben Elderton

**Table 6.3:** [REP1-298](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
ELD-001	General Matters	The Scheme	<p>Executive Summary</p> <p>This representation, submitted on behalf of Trescella and Ben Elderton (trading as FC &amp; CC Elderton), concerns the impact of the proposed Green Hill Solar Farm cable route and associated works on land at Glebe Farm, The Meadows, and adjoining holdings in Earls Barton, Northamptonshire. The Eldertons' family-run farming business, established over four generations, manages approximately 250 acres producing cereals, pulses, and vegetables for local sale through a long-established farm shop that employs three staff and provides the partners' primary income. While the Eldertons support renewable energy in principle, they strongly oppose the proposed cable routing and compound locations due to severe disruption to their operations and future viability. The scheme would temporarily and permanently reduce farmable land, restrict access, interrupt irrigation and drainage systems, and threaten the continuity of the farm shop by impeding customer access. Moreover, the absence of "lift and shift" provisions within the easement design would sterilise future farmyard expansion and potential development opportunities.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant is engaging with the Landowners to understand the farming business and various enterprises, with a view to mitigating the impacts of the cable route and compound area.</p> <p>Responses in regard to the location of the Cable Route Corridor and construction compound are detailed in response to 'ELD-007' and 'ELD-009'.</p> <p>With regard to the potential for restricting access, the Applicant has met with the Landowners on site to understand these issues. The Applicant has taken measures to mitigate this risk, including the removal of a previously proposed access to the west of the farmyard, and has refined the cable route corridor to the east to remove an area of farmyard which was previously included in the draft order limits.</p> <p>With regard to 'lift and shift' provisions, we have agreed that the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The representation requests that the cable and compound be rerouted—preferably along the easternmost boundaries adjacent to the A45—to minimise business and environmental harm. It also highlights potential sterilisation of sand and gravel reserves and medium-to-long-term development land value losses. The Eldertons seek detailed plans, fair compensation, and binding commitments from Island Green Power to ensure their business's sustainability and property rights are adequately protected.	cable will be positioned as far from their farm buildings as possible within the Order Limits, but this will be subject to surveys post consent and detailed design.
ELD-002	General Matters	The Scheme	<p>Background</p> <p>We are instructed on behalf of Trescella and Ben Elderton, trading as FC &amp; CC Elderton of Glebe Farm, Great Doddington Road, Earls Barton, Northamptonshire. Mrs T Elderton and Mr B Elderton are the joint owners of Glebe Farm, Earls Barton, registered under Land Registry Title: NN177341 and extending to approximately 144.31 acres, shown edged red on the attached plan, and Mr B Elderton is also part owner of Land north of Great Doddington Road, Earls Barton, amounting to 32.574 acres, and The Meadows, Earls Barton, amounting to 19.366 acres, and shown edged blue on the attached plan, both registered under Land Registry Title: NN403365; and, part owner of land off Mill Lane, Earls Barton, amounting to approximately 53.063 acres, part registered under Land Registry Title: NN212817 and part unregistered, shown</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes that initial correspondence was provided in January 2024, followed by ongoing engagement regarding survey access and discussions on scheme details.</p> <p>The <b>Consultation Report Revision A [REP1-017]</b> details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development.</p> <p>As acknowledged in later responses 'ELD-007' and 'ELD-009', the location and size of the construction compound will be determined prior to construction at detailed design</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>edged green on the attached plan. FC &amp; CC Elderton is a Partnership between Mrs T Elderton and Mr B Elderton who occupy the aforementioned property.</p> <p>The farming partnership FC &amp; CC Elderton is a business built and expanded on this site over four generations. It currently covers farms a total of 250 acres owned throughout the family, all of which will be disrupted by these cable works. It produces Cereals and pulses as well as a wide variety of vegetable produce sold direct to local people. The two partners and 3 employees rely on this business as their primary source of income. The business also has a focus on serving its local community where possible and producing food efficiently alongside nature promoting work wherever possible.</p> <p>The abovementioned properties are affected by the proposed cable route, working corridors, compound areas, and access in respect of these.</p> <p>We are instructed to make formal representations on the Scheme, both on general and specific matters. The representations are made Without Prejudice to making further representations for different reasons in order to amplify these representations.</p>	<p>stage and the precise alignment of the cable circuits within the 50 m Cable Route Corridor will be confirmed during the detailed design stage.</p> <p>The Applicant will continue to engage with the landowners on various matters.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>It should be noted that until Monday 7th April 2025, there had been minimal direct consultation with my client and therefore information had to be gleaned from requests for surveys by Island Green Power and their contractors and general mailshots in the locality. Over the period 7th April to the 9th April 2025, we were provided more detailed information. However, the information presented is not in sufficient detail in order to assess the full impact on my client's freehold and leasehold interests.</p> <p>We have requested the Heads of Terms for the cable easement, and the Licence for Access and compound areas. These have been supplied and are under negotiation.</p> <p>We would therefore, like to formally record our principal concerns, based upon the information that is available at this stage. We do not wish to be put in a position whereby when it comes to the 'detailed design stage', we are told that the design issues raised should have been dealt with earlier in the Scheme and it is too late. Island Green Power, or their successors, cannot say they will deal with matters in dispute at a later stage. These issues should either be dealt with during the application process or determined by the appropriate Authority.</p>	



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
ELD-003	General Matters	The Scheme	<p>Summary of Our Position</p> <p>My clients support the principle of green infrastructure, however they do not support the proposed cable route due to the disproportionate impact on their farming and greengrocery business, both pre and post construction.</p>	The Applicant notes this comment.
ELD-004	General Matters	The Scheme Cable routing	<p>We are informed that the laying of the cable over my client's property will be completed within 3 months but the area identified for a compound will be required for a period of up to two years. Both will result in a reduction of the farmable area of my client's property, which potentially makes their business unviable. It should be noted that the impact to the business is not only the specific areas affected but also the wider effect on the business regarding crop rotation etc. The land is used to grow produce that is sold in the farm shop as well as for traditional arable farming. My clients operate a farm shop, which primarily acts as a greengrocer. The farm shop has a significant turnover and sustainable profits. Combined with and supported by assets of the arable enterprise this supports three full time employees, the drawings of Mrs T Elderton and Mr B Elderton, and year-on-year capital investment into the farming business.</p> <p>We are concerned that as a result of traffic management etc during the construction</p>	<p>The location and size of the construction compound will be determined prior to construction at detailed design stage. The location and size of the compound is discussed in response to ELD-007 below.</p> <p>The construction compound and the laying of cables only results in a short- to medium-term temporary loss of productive farmland as the land will be reinstated quickly after the construction period.</p> <p>Please refer to response to MAPC-009 of the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to impacts on roads and impacts on local businesses.</p> <p>Whilst the business at Glebe Farm has not been assessed in isolation, it is considered that the traffic</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			period, there will be an interruption to the farm shop in terms of accessibility. The farm shop/greengrocers has been open and trading 51 weeks of the year for the past 14 years with a loyal customer base. Many of those customers are elderly and we are concerned that the interruption caused by the scheme will deter customers from visiting the farm shop, both during construction and after construction, which may lead to reduced turnover and profit.	management measures set out in the <b>OCTMP Revision A [REP1-145]</b> are sufficient to ensure disruption to the business and its customers are not significantly affected. These measures will allow the business to remain open at all times, with any road closures of Doddington Road (only between Glebe Farm and the A45 junction) prioritised for nighttime works, and with suitable diversion routes (through Earls Barton) provided with sufficient advance notice. The Outline CTMP is secured by Requirement 15 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> .
ELD-005	Minerals	Sterilisation	The proposed cable route in relation to the land immediately surrounding Glebe Farm effectively sterilises/prohibits any future expansion of the farm yard, as we are told by Matthias Charlton MRICS and Julian Barter that the anticipated cable easement will not contain 'lift and shift' provisions. It is assumed that the cable easement will prohibit the erection of buildings over the easement width, which we are informed by Matthias Charlton MRICS is 12m in width (6m either side of the cable). The Doddington Road is a barrier to the north, the land falls away to the south and	The Applicant is not able to include a lift and shift clause in the proposed easement as the cable in this section is 400kV. Moving the cable would require the cable to be made safe, resulting in periods where sites Green Hill A to E would be disconnected from the grid and unable to export electricity. Large-scale solar farms such as Green Hill Solar Farm are designated as Critical National Priority infrastructure as they have a critical





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			extending the yard to the west would inhibit the views from the farmhouse. Therefore, the most logical direction for the expansion of the farm yard is to the east, where the cable is proposed.	<p>role to play in achieving the government's aims for decarbonisation and energy security. As such, the potential generation loss associated with the exercise of a lift and shift clause is considered to be disproportionate to the impacts to landowners.</p> <p>The Applicant advises that the cable easement being sought on this land is 10m in width, other than in locations where trenchless techniques such as HDD may be required to cross underneath obstacles, where the easement would be wider, subject to detailed design.</p> <p>The cable route corridor has been routed along field boundaries to reduce impacts to farming. Where the overhead lines (OHLs) intersect fields, the cable route corridor has been routed beside this infrastructure as far as possible to minimise additional land sterilisation whilst maintaining separation distances from the OHLs.</p>
ELD-006	Hydrology and flood risk	Drainage and Water Supply Pipe	The proposed cable route crosses two drainage ditches, both of which take road drainage from the village of Earls Barton. The	Maintenance of the hedgerow above the location of the cabling will be possible, as required. Any



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>southern most ditch requires some clearing work of hedge coppicing/gapping up to function properly. We require clarification as to whether such ditch and hedge maintenance will be able to continue over the cable. The field drainage should be picked up at the outset and properly dealt with, with a cut off/header drain being laid . The drainage scheme should be designed to ensure a clear outfall and location, which can be managed and maintained in the future. The land drainage should be installed early in the construction process to ensure drainage problems and flooding do not occur. Any drainage scheme should be clear as to the future maintenance and responsibility of drainage downstream from the drainage outfall.</p> <p>Glebe Farm is equipped with an irrigation supply main. The water is pumped from an underground well situated to the south of the A45 via an asbestos pipe (crossing underneath the A45) into header tanks located at Glebe Farm yard. From the header tanks, there are a series of pipes running towards Mill Lane to a series of hydrants for irrigation purposes. The rising main from the pumping house to Glebe Farm, is laid at a depth of approximately 2ft (0.61m). We are informed by Matthias Charlton MRICS that your proposed cable will be laid at a depth of 3.93ft (1.2m).</p>	<p>hedgerow within the cable route corridor that is removed as part of the laying of the cable will be reinstated in line with the <b>OLEMP Revision A [REP1-137]</b>.</p> <p>The drainage strategy for the Scheme is outlined in the <b>FRADS [REP1-053]</b>.</p> <p>Specifically, measures for the Cable Route Corridor are outlined in <b>Appendix 10.2 - Annex A – Flood Risk Assessment and Drainage Strategy [APP-098 to APP-099]</b>. The detailed drainage strategy must be approved by the relevant planning authority in accordance with Requirement 11 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>The Applicant confirms that the depth of 1.2m is the minimum depth that the cable will be laid at, save where this is not possible due to ground conditions. The maximum depth is 2m below any existing apparatus. This is secured in the <b>CDPP Revision A [REP1-151]</b>. The Applicant is open to discussions regarding the upgrade of the irrigation supply pipe within the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Consequently, irrigation water supply and related electrical supply will be severed during construction. Depending on the time of year, temporary arrangements will need to be made to maintain a water supply whilst a permanent solution is being undertaken; the water main is in constant use between April and August Past experience has shown that this old, adopted Anglia Water infrastructure is brittle and prone to cracks. Simple joints and repairs have been unsuccessful due to disturbance causing further stress and breakage. My client has in the past, replaced large sections with MDPE south of the A45. Therefore, it would be preferable to install a new MDPE 80-100mm for this section measuring approximately 220m prior to cable laying. From the plastic pipe laid up to the A45 boundary to the plastic pipe entering the yard and header tanks. This will minimise the risk of leaks going forward, massively reducing if not negating the need to carry out emergency works above the proposed new cable.	cable route works and will contact the Landowners for further details.
ELD-007	Development Consent Order	Works Compound	An area measuring 10 acres is proposed to be located on my client's land for use as a compound whereby welfare facilities, portacabins and materials will be stored. During our site meeting on 7th April 2025, Matthias Charlton estimated that the actual area required could be reduced to approximately 100 to 150m <sup>2</sup> , being between 1	The location and size of the construction compound will be determined prior to construction at detailed design stage.  Through consultation with the Landowner in April 2025 the area within the Order Limits for the construction compound was



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to 1.5 hectares (2.2471 to 3.7 acres); the DCO application includes the larger area of approximately 10 acres. If the site compound is located in the north-western corner of this field parcel, labelled 'A' on the plan attached hereto, it will effectively cut the field into two unworkable/unprofitable shapes and sizes for the duration of the use of the compound. Consequently, compensation/remuneration would need to allow for the entire 32.574 acres parcel and not just the areas included within the Development Consent Order Application. However, if the cable and compound are located as far east as possible towards the A45 then approximately one half of the field would be farmable resulting in reduced compensation/remuneration and far less degradation of these sustainably managed soils.	reduced before submission of the Application.  Where feasible, the Applicant will engage with the landowner to identify opportunities to minimise impacts on the business.
ELD-008	Transport and Access	Construction, operational impacts/access	It is important that during construction the working width is temporarily fenced to ensure that contractors within encroachment/transgression.  It is important that access is maintained during construction and noted there are multiple accesses from the Doddington Road and Mill Lane. We request details of the proposed access arrangements during construction.	As outlined in the <b>OCEMP Revision A [REP1-221]</b> under section 2.11 Site security during construction will be managed by the contractor(s). The site security fencing will remain in place throughout the duration of the construction period. Any storage of materials will be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas would be implemented by the contractor(s).



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Response to CAw-001 of <b>The Applicant's Responses to Relevant Representations [REP1-161]</b> covers considerations to works in relation to Mill Lane.
ELD-009	Development Consent Order	Scheme location	<p>My client's preference is for the cable to be re-routed and compound re-located, such that their property is not directly affected by the scheme. However, as my client's property is included within the Development Consent Order Application, their strong preference is for the cable to follow the eastern most boundary of The Meadows, labelled 'P' and 'O' on the attached plan; as close to the A45 as possible in respect of the land at Glebe Farm, the opposite side of Glebe Farm, labelled 'A' on the attached plan. In respect of the section close to the farm buildings, we request that the cable is located as close to the A45 as possible and preferably underneath the existing overhead cables where presumably there is already a 'sterilised' area.</p> <p>During the site meeting on 7 April 2025 with Matthias Charlton MRICS, we were shown a plan of the proposed cable route. The plan showed the cable entering the Glebe Farm land at the southern most corner, following the broad alignment of my client's farm track, in a north easterly direction, crossing the track and zig zagging around the farm buildings. My client's preference would be for the cable to</p>	<p>The precise alignment of the cable circuits within the 50 m Cable Route Corridor will be confirmed during the detailed design stage.</p> <p>The cable route corridor has been routed along field boundaries to reduce impacts to farming. Where the overhead lines (OHLs) intersect fields, the cable route corridor has been routed beside this infrastructure as far as possible to minimise additional land sterilisation whilst maintaining separation distances from the OHLs.</p> <p><b>Figure 19.2.17 Tree Impact Plan Cable Route Corridor Sheet 4 [APP-517]</b> outlines the trees within the Cable Route Corridor and those potential requiring removal.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			follow a more natural and gradual curved route following the existing overhead lines, such that it crosses my client's track, close to the small spinney adjoining the A45. We have speculated that your preferred cable route may have been designed to avoid the removal or damage to ONE mature Ash tree, however it should be noted that one of the mature Ash trees appears to have dieback as do many of the trees from more recent plantings and in our view is not a sufficient reason to zig-zag the cable around the buildings, which would result in a longer cable route for your client and have a greater impact on my client's property.	
ELD-010	Compensation	Compensation Land Value Issues	<p>It should be noted that there is unworked sand and gravel in respect of The Meadows, shown labelled 'P' &amp; 'O' on the attached plan, and negotiations ongoing with a mineral operator. Your proposed cable may sterilise quantities of sand and gravel and you may therefore wish to reconsider routing your cable through my client's property.</p> <p>It should be noted that the land immediately surrounding Glebe Farm may have medium to long term development potential owing to its proximity to the A45 Doddington/Earls Barton junction and the village of Earls Barton. If there is no ability to lift and shift the cable at Island Green Power or their successors' cost, and we are unable to build on ground above the cable, then is likely to sterilise</p>	<p>The <b>Draft DCO Revision A [REP1-008]</b> incorporates the mineral code at article 23, which provides a framework for managing any potential sterilisation of minerals such as sand and gravels in the event they are to be worked in the future.</p> <p>Please refer to the response to ELD-005 in relation to lift and shift provisions.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			development potential. My clients expect to be compensated for any such reduction in the value of the freehold.	



## 7 The Applicant's Responses to Relevant Representations by Theme

### 7.1 Agriculture and Soils

**Table 7.1: Agriculture and Soils**

Reference	Issue	Comments/Issue Raised	Applicants Response
AGR-001	Loss of farmland	Comments noted that approximately 65% of the site comprises Best and Most Versatile (BMV) land (Grades 1, 2, and 3a), though DEFRA mapping suggests this is underestimated, with most of the site being Grade 2 and Grade 3 land.	<p>The baseline information for <b>Chapter 20: Agricultural Circumstances [APP-057]</b> is informed by desk study information and site surveys.</p> <p>As noted by Natural England, the provisional 1:250,000 scale agricultural land classification data maps (the DEFRA mapping) '<i>are not sufficiently accurate for use in assessment of individual fields or development sites and should not be used other than as general guidance</i>' (Natural England TIN049 'ALC: Protecting the best and most versatile agricultural land, 19 December 2012).</p> <p>ALC surveys were conducted on Green Hill A, A.2, B, C, D, E, F and G between April and July 2024. A survey of Green Hill BESS was completed in November 2023.</p> <p>The primary purpose of the ALC survey is to characterise the soils and assess the quality of the agricultural land in accordance with the Agricultural Land Classification of England and Wales: Revised guidelines and criteria for grading the quality of agricultural land, MAFF (1988).</p> <p>The <b>Farming Report [APP-571]</b> describes in section 3 and section 9 how the predicted land quality of the area is a mixture of mostly 20 – 60% BMV and &gt;60% BMV. The identified land quality across the Site overall is 65% BMV, which is entirely in keeping with the mix across the wider area. Land quality can only be identified by field survey, which is an intrusive and slow process, and given the mixed land grades identified across the sites, there is no reason to anticipate that other land nearby would be other than a mix of BMV and non-BMV quality.</p>






AGR-002	Food security	<p>Comments highlighted that the proposed site currently produces cereals such as wheat and barley, which are vital for UK food security and supply major mills including Whitworths, Weetabix, Richardson's, Heygates, and Navara.</p> <p>Comments referred to the UK Food Security Index, noting that while the UK is currently 92% self-sufficient in cereals, climate change and other pressures will likely reduce this ratio, making preservation of arable land critical.</p> <p>Comments stated that replacing productive agricultural land with solar infrastructure would undermine the UK's ability to produce food sustainably, increasing reliance on imports and energy.</p> <p>Comments stressed the duty of care for future generations by developers, landowners,</p>	<p>Please refer to the response to AGR-002 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to food security.</p> <p>The Government's position, as set out in the Solar Roadmap (Department for Energy Security and Net Zero, June 2025) is that <i>"the biggest risk to food security and the natural environment is the climate and nature crisis. That is why it is important that the UK takes a leadership role, working with partners around the world, in accelerating to net zero, including by rapidly expanding solar power generation"</i>.</p> <p>As set out in the Solar Roadmap, the expansion of solar power is intended to address climate change, which is the biggest threat to food security.</p> <p>Government's land use policies anticipate the need for land use to change. The HM Government "Land Use Consultation" (January 2025) anticipates the need for significant land use change or management change to deliver housing, energy, environmental and climate benefits, involving 19% of agricultural land. It is noted that <i>"the Government is committed to maintaining food production. Our assessment is that, based on historical trends of productivity improvement, and supported by new and emerging innovations, the impact of these land use changes on domestic food production will be offset by productivity improvements"</i> (pages 77 – 79).</p> <p>The Food Security Report 2024 (Department for Environment, Food and Rural Affairs, United Kingdom Food Security Report 2024, 11 December 2024) in the executive summary records a stable, and slightly improving, ratio of importation and production: <b><i>"The UK's overall balance of trade and production is broadly stable. The UK continues to source food from domestic production and trade at around an overall 60:40 ratio."</i></b></p> <p><b>Key statistic:</b> <i>The production-to-supply ratio was at 62% for all food and 75% for indigenous foods (meaning those that can be grown in the UK) in 2023, showing a small increase from 61% and 74% in 2021. This is a continuation of the broadly stable trend set in recent years"</i>.</p>
---------	---------------	--	--




		investors, and decision-makers to ensure proposals do not compromise food security.	
AGR-003	Farming businesses	<p>Comments noted that tenant farmers who wish to farm the land will lose opportunities, increasing reliance on food imports.</p> <p>Comments referred to concerns about the impact on farming communities, noting tenant farmers losing land without consent and landowners feeling pressured to accept rental offers due to sector instability.</p>	<p>Please refer to the response to AGR-002 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to impacts to farming landholdings.</p> <p>The <b>Farming Report [APP-561]</b> sets out an analysis of the effects on the farms involved. Much of the land is owned, but there are areas run by contractors or on tenancies. Farm reports, mostly following interviews, are set out in an Appendix. Where land is rented, there is either agreement to the Scheme, or in one case the land is held on a non-secure short-term arrangement only. The impacts are set out in the Farming Report, summarised in sections 8.21 to 8.24, and summarised in <b>Chapter 20 of the Environmental Statement [APP-057]</b>.</p> <p>It is concluded that no farms will be significantly adversely affected. There will be opportunities for farm related work from ongoing management of the land with sheep.</p> <p>The Applicant has entered into voluntary agreements with landowners, paying market rates.</p>
AGR-004	National policy	Comments stated that the proposal conflicts with national policy (NPPF Paragraphs 174(b) and 175) and local planning policies in the North Northamptonshire Joint Core Strategy (Policies 3, 25, and 26) requiring protection of high-quality	Please refer to the response to SBMP-002 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to use of agricultural land and the site selection process.



		agricultural land and rural character.	
AGR-005	Future grazing	<p>Comments referred to challenges with grazing livestock alongside solar panels, highlighting breed suitability issues, need for equipment protection, and operational difficulties such as quad bikes not fitting between panels.</p> <p>Comments noted adaptation challenges for sheep and sheepdogs, including time required for adjustment and restrictions on flock movement to avoid injuries.</p> <p>Comments raised concerns that energy companies prioritize panel density over farming needs, making coexistence impractical for most farmers.</p>	<p>The grazing of solar panel areas by sheep is both practical and common, and the areas will be available for grazing.</p> <p>The management of solar panel areas with sheep is well established. The Agricultural Land Use in England at 1 June 2025 statistics (Defra, 25 September 2025) identifies that land used for solar panels also used for grazing in agricultural production was 4,937 ha, up from 3,600 ha in 2024 as reported in the <b>Farming Report [APP-571]</b> at 9.31 (v).</p> <p>Sheep can see under solar panels, as the following photograph (taken by Kernon Countryside Consultants (KCC) on a solar farm in Monmouthshire) shows.</p>  <p>It is agreed that the use of quad bikes is restricted by the existence of the panels, but sheep dogs can see under the panels easily.</p>
AGR-006	Soil health and quality	Comments highlighted that soil compaction and reduced sunlight under panels can degrade soil	Embedded mitigation is secured through the <b>OCEMP Revision A [REP1-131]</b> , <b>OOEMP Revision A [REP1-133]</b> , and <b>ODS Revision A [REP1-135]</b> and the <b>OSMP [APP-550]</b> , which require soil protection, reinstatement and appropriate construction methods to ensure soil




		<p>health and plant growth, affecting long-term ecosystem services.</p> <p>Comments noted that solar farms damage soil structure through compaction and can cause waterlogging and erosion from panel runoff.</p> <p>Comments warned that reseeding is not possible under solar arrays, leading to long-term soil degradation.</p>	<p>management throughout the Scheme's lifetime. Management plans are secured by Requirements 13, 14, 21 and 19 respectively of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>. Failure to comply with this requirement is a criminal offence.</p> <p>Panels are raised sufficiently off the ground to permit easy access for sheep. Shading under panels is consequently light and grass growth is not prevented. As noted above, almost 5,000 ha of solar panel areas were also used for grazing and so were in continued agricultural use at 1 June 2025.</p> <p>Solar panels do not, of themselves, result in compaction. Soil compaction during the construction process, which generally uses small machinery, is considered in the <b>ES Chapter 20 Agricultural Circumstances [APP-057]</b> and the <b>Farming Report [APP-571]</b>. There are gaps between the panels, as well as gaps between strings of panels, as shown below (photo taken by KCC, Yorkshire).</p>  <p>Grass cover will be maintained. This prevents soil and water erosion.</p> <p>The conversion of arable land to grassland would be a long-term fallow and will remove disturbance on the soils from arable farming e.g. ploughing and big machinery, and will result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term. As stated in</p>
--	--	--	---



			Chapter 20: Agricultural Circumstances [APP-057], this would result in beneficial effects on soil health and land quality.
AGR-007	Decommissioning and restoration	<p>Comments referred to uncertainty over decommissioning and restoration, with no enforceable guarantees that land will return to agricultural use.</p> <p>Comments highlighted that the Environmental Statement does not specify how land will be restored to its original condition after the solar farm and BESS installations are decommissioned, with no timeline, methodology, or soil recovery measures provided.</p>	<p>Please refer to response to NNC 7.17 to 7.20 of the Applicant Response to Local Impact Reports. In respect of decommissioning, Requirement 21 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b> requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. Please refer to the <b>ODS Revision A [REP1-135]</b> which provides details and control measures of decommissioning activities.</p> <p>Please refer to the response to NNC 7.17 to 7.20 in the Applicants <b>Responses to Local Impact Reports [EX2/GH8.1.14]</b> in regard to decommissioning.</p>
AGR-008	Land use	Comments stated that the Environmental Statement map (Figure 20.4) is factually inaccurate as it omits farms in stewardship schemes, including White House Farm, Bozeat, and possibly others, giving a misleading impression of land use.	<p>The Applicant acknowledges that the Countryside Stewardship Scheme 2016 Management Areas (England) was omitted from <b>Figure 20.4 of Chapter 20: Agricultural Circumstances [APP-057]</b>.</p> <p>However, it is considered that this would not alter the main baseline of land use and the significance of the effects, outcome and conclusions of <b>Chapter 20: Agricultural Circumstances [APP-057]</b>.</p>





AGR-009	Soil health and quality	<p>Comments advised that panels on steep slopes should be aligned east-west to minimize soil erosion; if this cannot be achieved, these fields should be excluded from the development.</p>	<p>Erosion risk beneath solar panels is controlled by ground cover and soil condition rather than panel orientation. Published studies, including Cook and McCuen (2013) and the Welsh Government ADAS review (2023), show that runoff from panels only causes rilling where soils are bare or compacted. Where a continuous grass sward is maintained, runoff disperses as sheet flow and infiltrates into the soil, including on moderate slopes.</p> <p>The Scheme secures permanent grassland beneath and between arrays and includes soil protection, compaction monitoring and decompaction measures through the <b>OCEMP [REP1-131]</b> and <b>OSMP [APP-550]</b>. These controls avoid the conditions that lead to concentrated flow paths. On this basis, there is no requirement to align panels in a particular direction for erosion management and no need to exclude fields.</p> <p>The photographs below show typical panel arrangements on sloping land where vegetation cover prevents erosion and there is no evidence of rilling or scouring.</p> 
---------	-------------------------	---	---



			
--	--	--	---



## 7.2 Alternatives and Design Evolution

**Table 7.2: Alternatives and Design Evolution**

Reference	Issue	Comments/Issue Raised	Applicants Response
ALT-001	Alternative Locations	<p>Comments referred to the use of brownfield sites and rooftops as a suitable alternative locations to use of agricultural land.</p> <p>Comments suggested there are numerous alternative grid connection points, referencing resources such as OpenInfraMap for electricity network routes and power sources.</p> <p>Comments argued that former quarry sites could be suitable for solar farms, citing the London Road Solar Farm near Irchester (56MW capacity) as an example of successful development on restored quarry land.</p>	<p>Please refer to the response to ALT-002 and SAMP-004 in The <b>Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to use of brownfield land and the site selection assessment.</p> <p>The Applicant acknowledges alternative locations for grid connection; however, the Applicant has a grid connection agreement with National Energy System Operator (NESO) as outlined in the <b>Grid Connection Statement [APP-557]</b> which sets out the connection arrangement.</p> <p>The National Energy System Operator (NESO) publishes a public list of all grid connection offers made. This is known as the Transmission Entry Capacity (TEC) register and can be found at: <a href="http://www.neso.energy/industry-information/connections/reports-and-registers">www.neso.energy/industry-information/connections/reports-and-registers</a>. The register confirms the connection date is 2029.</p>
ALT-002	Site selection	<p>Comments stated that the site selection process fails to demonstrate proper consideration of brownfield or rooftop options, making the proposal contrary to national policy and an inappropriate location for a solar farm.</p>	<p>Under Stage 3 of <b>ES Appendix 5.1: Site Selection Assessment [APP-077]</b> outlines consideration of brownfield sites. There was no brownfield land that met the minimum individual size threshold nor the area of approximately 1,100ha required for a network of sites in proximity to the Scheme, identified within the 20km search area from the Grendon Substation PoC. <b>Figure 5.4 [APP-225]</b> which shows all brownfield sites over 1 ha in size taken from the most up to date Brownfield Land Registers of Bedford Borough Council, West Northamptonshire Council, North Northamptonshire Council and Milton Keynes City Council.</p> <p>Sites smaller than 1ha and were discounted due to their inability to provide a viable land parcel of 40ha in combination with other</p>





Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>land due to inefficiencies in both layout and required connection between sites. A list of the brownfield sites over 1ha have been outlined in Annex 2 of <b>ES Appendix 5.1: Site Selection Assessment</b>.</p> <p>Of the sites over 1 ha in size, none were large or proximate enough to provide a viable land parcel of at least 40ha that could be developed as part of a network of sites near to Grendon PoC. Additionally, a number of sites have planning permission for residential development and/or are allocated for residential/mixed use development and were therefore not considered to be available for use for solar.</p> <p><b>Environmental Statement Chapter 5: Alternatives and Design Evolution</b> (para. 5.6.18 to 5.6.20) acknowledges the use of rooftops and requirement for roof mounted solar, however, it outlined that individual commercial rooftops would not meet the minimum 40 ha area site threshold.</p> <p>NPS EN-3 reiterates there is a requirement for both ground and roof mounted solar, suggesting that solar generation is expected to make achieving net zero targets and the energy security goals set out in the British Energy Security Strategy, of “a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW)”.</p>



## 7.3 Climate Change

**Table 7.3: Climate Change**

Reference	Issue	Comments/Issue Raised	Applicants Response
CLI-001	Embodied carbon	<p>Comments referred to carbon footprint and ethical construction concerns, requesting investigation into supply chain standards to ensure panels are not produced using coal-powered stations or exploitative labour.</p> <p>Comments noted that industrial-scale solar farms do not necessarily reduce carbon emissions when full lifecycle impacts are considered.</p> <p>Comments highlighted that manufacturing solar panels is highly energy-intensive, often relying on coal-powered factories, with 90% of polysilicon produced in China.</p>	<p>Please refer to the response to SOC-011 and OEM-003 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to supply chain concerns.</p> <p><b>ES Chapter 7: Climate Change [APP-044]</b> has assessed the impact of GHG emissions and savings arising from a lifecycle assessment of the Scheme on the climate over its lifetime (See section 7.8). Please refer to the response to CLI-002 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to embodied carbon.</p> <p><b>ES Chapter 7: Climate Change [APP-044]</b> assesses the emissions associated with the production of solar panels based on the raw materials used on section 7.8. The assessment concludes the Scheme has a beneficial impact on climate change as it reduces the GHG emissions in comparison with a scenario without the Scheme.</p>
CLI-002	Lifecycle emissions	<p>Carbon payback period for panels is 1–4 years, meaning emissions from production take years to offset.</p>	<p>While the assessment in <b>ES Chapter 7: Climate Change [APP-044]</b> does not assess the solar panels payback period independently, the assessment concludes that the Scheme will result in a net saving of 186,306 tCO<sub>2</sub>e if tracked panels are used or 50,811 tCO<sub>2</sub>e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect</p>



## 7.4 Community Benefits

**Table 7.4: Community Benefits**

Reference	Issue	Comments/Issue Raised	Applicants Response
CBF-001	Community Benefit Fund Security	<p>Comments referred to the lack of binding community benefits within the proposal.</p> <p>Comments noted that the scheme offers little to no local benefit, arguing that it primarily serves shareholders and landowners.</p>	<p>The Applicant has committed to a community benefits package and to ensuring that employment and supply chain opportunities go to local contractors and employees wherever practicable. Please refer to response to CBF-001 and SBMP-007 within the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to the benefits fund.</p>
CBF-002	Energy bills	<p>Comments stated that the development will not reduce local or national energy prices, reinforcing concerns about limited community advantage.</p> <p>Comments recommended that impacted villages receive free electricity (minimum 5% of generated capacity) to offset disruption and support local businesses.</p>	<p>Please refer to response to SBMP-007 of the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to energy bills.</p> <p>The <b>Grid Connection Statement [APP-557]</b> sets out the connection arrangement. The scheme will supply the grid directly. As outlined in SBMP-007 large-scale solar power decarbonises the electricity system and lowers the market price of electricity.</p> <p>The Applicant has committed to a community benefits package as part of the Scheme, which will benefit local villages.</p>
CBF-003	Community Benefit	<p>Comments suggested that if approved, grid connection and storage capacity should allocate at least 25% to local brownfield and warehouse rooftop projects free of charge.</p>	<p>The Applicant notes this comment.</p> <p>However, as outlined in the <b>Grid Connection Statement [APP-557]</b> the Scheme will have an export and import connection to the National Electricity Transmission System with the Point of Connection at the existing Grendon 400kV substation. The Grid Connection Agreement allows the Applicant to export the electricity produced at Green Hill A, A.2, B, C, D, E, F, and G, not to exceed 500 MW (AC). It also</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>allows for the import of up to 500 MW (AC) of electrical energy to be stored in an Energy Storage Facility.</p> <p>An allocation of renewable development on brownfield and rooftops would be subject to separate grid connection agreements and planning applications.</p> <p>As suggested in CBF-001, the Applicant is committed to a community benefits package.</p>



## 7.5 Compulsory Acquisition

**Table 7.5: Compulsory Acquisition**

Reference	Issue	Comments/Issue Raised	Applicants Response
CAC-001	Objection to use of CA powers	<p>Comments expressed concern that a local farmer in Grendon parish has been asked to surrender land rights or face potential Compulsory Purchase Orders for cable connection works.</p> <p>Comments stated that any use of CPOs must be clearly justified, fully documented, and subject to consultation with the parish to ensure accountability and community involvement.</p>	<p>Please refer to response to response to SOC-005 in <b>The Applicant's Responses to Relevant Representations [REP1-161]</b> with respect to impacts to farming landholdings.</p> <p>Please refer to response to response to CAC-001 in <b>The Applicant's Responses to Relevant Representations [REP1-161]</b> with respect to compulsory acquisition.</p>



## 7.6 Consultation

**Table 7.6: Consultation**

Reference	Issue	Comments/Issue Raised	Applicants Response
CON-001	Limited consultation	<p>Comments noted that local engagement has been limited and perceived as tokenistic.</p> <p>Comments stated that residents had little opportunity to influence the design or scale of the proposal.</p>	<p>Please refer to response to CON-001 in <b>The Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to approach to and adequacy of consultation.</p> <p>The <b>Consultation Report Revision A [REP1-107]</b> details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development.</p> <p>The Applicant notes <b>Adequacy of Consultation Responses [AoC-001 to AoC-015]</b> where consultees provided their feedback on the adequacy of the consultation.</p>



## 7.7 Cultural Heritage

**Table 7.7: Cultural Heritage**

Reference	Issue	Comments/Issue Raised	Applicants Response
CUL-001	Heritage setting	<p>Comments raised concern that the scheme would affect Mears Ashby, which is under conservation status.</p> <p>Comments referred to the proximity and scale of the scheme suggesting that it would harm the rural character and heritage setting of villages, particularly Mears Ashby and Easton Maudit.</p> <p>Comments emphasized that heritage assets include not only physical structures but also their surrounding landscape, which would be damaged and impaired by the project.</p> <p>Comments referred to Village Design Statements and Conservation Area boundaries, stating that the visual impact of solar panels will damage these beyond recognition, affecting churches, listed buildings, and period properties.</p> <p>Comments argued that the proposal will harm the county's defining "spires and open views," eroding historic landscape character and heritage settings.</p>	<p>Please refer to the response to NNC-058 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to potential impacts to the Mears Ashby Conservation Area.</p> <p>Please refer to the response to MAPC-002 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> which details the embedded mitigation and assessment of Mears Ashby Conservation Area.</p> <p>Please refer to the response to HE-006 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to potential impacts to the Easton Maudit Conservation Area.</p> <p>Please refer to the response to CUL-003 and HE-006 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to potential impacts to the heritage setting.</p>
CUL-003	Planning policy	<p>Comments noted that the assessment fails to address cumulative impacts on listed buildings and conservation areas, contrary to NPPF Paragraphs 199–202.</p>	<p>Section 12.11 of <b>Chapter 12: Cultural Heritage [APP-049]</b> provides an assessment of cumulative impacts.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			Five 'other developments' were assessed for cumulative impacts to heritage assets; no significant cumulative effects were identified.
CUL-004	Archaeology	<p>Comments raised concern over evidence of Iron Age and Roman archaeological remains that could be lost.</p> <p>Comments noted significant Roman activity in the area and the risk of disturbing remains during construction and cabling works.</p> <p>Comments referred to archaeological concerns for fields in Area E and recommended removing any fields with significant remains from the scheme.</p> <p>Comments highlighted that the Nene Valley contains significant archaeological remains from Iron Age, Roman, and Viking periods, requiring full investigation before construction</p>	<p>Please refer to the response to CUL-002 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> for details of the archaeological assessment and mitigation strategy.</p> <p>Desk-based research (<b>ES Appendix 12.2 Archaeological Desk-Based Assessments [APP-121 to APP-127]</b>) and archaeological evaluation (<b>ES Appendix 12.3 Air Photo and LiDAR Mapping and Interpretation [APP-128]</b>, <b>ES Appendix 12.4 Archaeological Geophysical Survey Reports [APP-129 to APP-138]</b> and <b>ES Appendix 12.5 Interim Evaluation Trial Trenching Reports [APP-139 to APP-145]</b>) have successfully been used to identify archaeological sites within Site E and have informed the overarching archaeological mitigation strategy (<b>ES Appendix 12.6 Archaeological Mitigation Strategy [APP-146]</b>). The AMS is in line with appropriate policy and guidance and details several different mitigation options such as preservation in situ (i.e. no development area) and perseveration by record (i.e. excavation).</p>
CUL-005	Military air crash sites	Comments argued that the site includes areas of local historical significance, including a WWII bombing range and nearby crash sites.	Please refer to the responses to CUL-001 and CUL-002 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> for details of the archaeological assessment and mitigation strategy.





## 7.8 Ecology and Biodiversity

**Table 7.8: Ecology and Biodiversity**

Reference	Issue	Comments/Issue Raised	Applicants Response
ECO-001	General concerns about wildlife	<p>Comments raised concerns about harm to wildlife and natural habitats, removing grazing, foraging, and hunting opportunities for mammals such as deer, badgers, foxes, wild boar, hares, and rabbits.</p> <p>Comments warned that small burrowing animals entering the site could be trapped or poisoned due to risks posed to underground installations and cables.</p> <p>Comments noted that birds can bypass security fencing but are deterred by structural installations and reduced feeding opportunities, as grass is kept short and shrubs removed for maintenance.</p> <p>Comments warned that security fencing could trap or injure animals such as deer and hedgehogs, increasing collision risks on nearby roads (A509/A45).</p> <p>Comments emphasized the importance of Wilby Spinney and species present, including badgers, foxes, woodpeckers, water voles, adders, and bats.</p> <p>Comments raised concern that construction will fragment habitats, making it harder for animals to find food or mates.</p>	<p>Please refer to the response to ECO-005 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in respect of the potential for the Scheme to affect local wildlife.</p> <p>Security fencing will be permeable to mammals such as foxes and badgers, and wide buffer zones will permit continued movement of wildlife through the landscape. New habitat creation will benefit a wide range of wildlife, and bespoke enhancement measures, such as installation of bat and bird boxes, will also further enhance the Sites for these species.</p> <p>Please refer to the response to FC-008 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in respect of control of deer.</p> <p>Please refer to the response to NNC-035 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to badgers.</p> <p>Wilby Spinney at the eastern edge of Green Hill E will be retained and protected with buffer zones in accordance with embedded mitigation measures set out within <b>Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]</b>.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments highlighted risks to protected and vulnerable species such as lapwings, and ground-nesting birds like snipe and skylarks.  Comments noted disruption to migratory birds and feeding territories of protected raptors.	Please refer to the response to ECO-002 and ECO-006 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to birds of prey and habitat fragmentation.
ECO-002	Biodiversity Net Gain	Comments referred to biodiversity net gain concerns, noting lack of enforceable measures contrary to NPPF Paragraph 180 and the Environment Act 2021.	Please refer to the response to WNC-027 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to Biodiversity Net Gain.
ECO-004	Cable routing	Comments referred to impacts of long underground cable routes, warning of disruption to farmland and wildlife corridors, including hedgerow and tree removal.	Please refer to the response to ECO-003 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to cable routing.
ECO-006	Locality	Comments noted that large solar farms near nature reserves would cause significant suffering and habitat disruption for bats and birds.  Comments stated that solar farms near SPAs and Ramsar wetlands disrupt species movement, reduce biomass and plant diversity, and harm pollinators and soil organisms critical to ecosystem health.	Please refer to the response to EBPC-001 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to the assessment of potential impacts on wildlife including on the Upper Nene Valley Gravel Pits SPA, SSSI and Ramsar site and ECO-007 with consideration towards pollinators.
ECO-007	Pollution	Comments expressed concern about potential leaks or fires at the battery storage unit, risking contamination of streams feeding Sywell Reservoir and village ponds, impacting local wildlife.  Comments noted that fire suppression runoff contains hazardous substances (Cobalt, Nickel, Manganese, Fluorine, organic carbonates) per	Please refer to responses SGHS-007 and SGHS-014 in regard to risk of contamination and pollution associated with BESS.  For the BESS, a sealed and valve closed drainage system. During any incident all water within the compound is fully contained on site with no discharge until removal by tanker. This prevents



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>Ineris research. Contaminated runoff could impact local streams, farmland irrigation, and designated sites such as Upper Nene Valley Gravel Pits SPA, Ramsar wetlands, and SSSI areas downstream. Comments noted a letter from the Environment Agency (dated 25 Feb 2025) flagged this risk in relation to a nearby BESS application, requiring a runoff disposal scheme before development.</p>	<p>contaminated water entering the wider drainage network. On this basis the drainage design removes the pathway for pollution to reach the Nene or connected habitats.</p> <p>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 pollution impacts, is provided in the <b>HRA (Revision A) [REP1-153]</b>.</p> <p>Further responses are also discussed in the response to EBPC-001 and EA-003 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> which details pollution prevention controls.</p> <p>Please refer to the response to SGHS-014 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> which specifically refers to mitigation measures ensuring no uncontrolled release into adjacent streams or Sywell Reservoir.</p>
ECO-008	Displacement	<p>Comments emphasized displacement of indigenous wildlife such as owls, raptors, hares, and deer, with little chance of recovery even after decommissioning.</p>	<p>Please refer to the response to ECO-002, ECO-004, ECO-005 and ECO-006 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> in regard to birds of prey, decommissioning, impacts on wildlife, and habitat fragmentation.</p>



## 7.9 Energy Need and Policy

**Table 7.9: Energy Need and Policy**

Reference	Issue	Comments/Issue Raised	Applicants Response
ENE-001	Strategic planning	Comments suggested that large-scale solar farms should be strategically planned at a national level in coordination with the National Grid, rather than developer-led schemes.	<p>We acknowledge the suggestion that large-scale solar farms should be strategically planned at a national level in coordination with the National Grid. While national-level planning can provide a holistic approach to energy infrastructure, current policy and regulatory frameworks in the UK allow developers to bring forward projects that meet renewable energy targets and local needs.</p> <p>The National Policy Statement for Renewable Energy Infrastructure (EN-3), alongside the overarching EN-1, sets out the urgent need for new renewable electricity generation to meet the UK's Net Zero Strategy. These policies emphasise that electricity demand is expected to increase significantly (potentially doubling by 2050) requiring an increase in low-carbon generation, with solar playing a central role.</p> <p>Under the Planning Act 2008, developers of nationally significant infrastructure projects (NSIPs), such as solar farms over 50 MW in England, are encouraged to bring forward proposals that align with these objectives.</p> <p>Please refer to response to HoPC-003 in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in regard to Grid connection confirmation.</p>
ENE-002	Energy demand	Comments referred to concerns that the contracted queue for renewable energy projects far exceeds the UK's actual energy needs for net zero, with 889	The <b>Statement of Need [APP-556]</b> provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>GW currently in the queue compared to the 70–80 GW target, citing EnergyNetworks.org.</p> <p>Comments referenced Cornwall Insight analysis showing current grid connection queue for solar/BESS projects seeking connection before 2030 is 61 GW, more than double the UK's 2030 target of 27 GW and a Queue to 2035 is 129 GW, over four times the target capacity.</p> <p>Comments also questioned Grid connection feasibility and need for the scheme given competing projects and existing capacity constraints.</p>	<p>energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. The government's Clean Power 2030 Action Plan provides a framework for prioritising low carbon generation connections to support 45 to 47GW of solar power being connected to transmission and distribution networks by 2030 and 45 to 69GW by 2035, in support of achieving and sustaining a clean power system to prepare the UK for the rapid growth in power demand expected over the 2030s and 2040s.</p> <p>Please refer to response to HoPC-003 in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> in regard to Grid connection confirmation.</p>



## 7.10 General Matters

**Table 7.10: General Matters**

Reference	Issue	Comments/Issue Raised	Applicants Response
GEN-001	Decommissioning	<p>Comments referred to the lack of a clear and funded decommissioning plan, raising concerns about site abandonment, inadequate remediation, and future classification as brownfield land open to industrial development.</p> <p>Comments noted that the applicant has not committed to providing a legally binding bond or escrow fund to guarantee reinstatement works. Without such security, there is a risk that obligations will not be met if the operating company ceases trading or is dissolved.</p> <p>Comments argued that the parent company could wind up the project entity at the end of the operating period, leaving landowners responsible for costly decommissioning. This scenario is foreseeable and must be mitigated through enforceable conditions.</p> <p>Comments stated that clear, legally binding proposals must be secured before approval, ensuring obligations remain enforceable even if ownership changes or the applicant ceases to exist.</p>	<p>Please refer to the Applicant's response to 'SBMP-005' in <b>the Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to future decommissioning risk.</p>
GEN-002	Lessons learned	<p>Comments referred to lessons from failed projects, citing examples such as:</p> <ul style="list-style-type: none"><li>• Thurrock Council (fraud investigation).</li></ul>	<p>The Applicant acknowledges this comment and considers that adequate management plans are secured through the requirements set out in Schedule 2 of <b>Draft DCO Revision A [REP1-008]</b>,</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		<ul style="list-style-type: none"> <li>• White Elm Solar Farm (local opposition).</li> <li>• Highfield Energy Park (drainage issues).</li> <li>• California solar plant (shutdown due to debts and rising costs).</li> </ul>	ensuring that impacts are mitigated and risks effectively managed. These requirements constitute a legally binding obligation.
GEN-003	Cumulative impacts	<p>Comments stressed that the Green Hill Solar Farm cannot be assessed in isolation due to multiple other solar and BESS projects within a 10-mile radius (Easton Maudit, Yardley Hastings, Bozeat).</p> <p>Comments noted that the cumulative impact associated with BESS sites on hydrology, road use, and visual amenity is significant and.</p> <p>Comments stated that the Environmental Statement considers cumulative effects only for solar arrays, omitting BESS systems entirely, which undermines the integrity of the impact assessment.</p>	<p>Please refer to <b>Chapter 25: Cumulative Effects and Effects Interactions [APP 062]</b> for cumulative impact assessment. This has also been considered in each technical chapter of the Environmental Statement.</p> <p>A four-stage approach has been adopted for this assessment:</p> <ul style="list-style-type: none"> <li>• Stage 1 - Establishing the long list of 'other existing development and/or approved development';</li> <li>• Stage 2 - Establishing a shortlist of 'other existing development and/or approved development';</li> <li>• Stage 3 - Information gathering; and</li> <li>• Stage 4 – Assessment.</li> </ul> <p>The assessment of cumulative impacts takes into consideration projects within 10km of the Scheme of a similar size and/or character.</p> <p>The final shortlist, along with the criteria for inclusion and full justification, has been presented in <b>Appendix 25.2: Short List of Committed Developments [APP-189]</b>.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>The short list includes a list of those developments considered to have the potential to generate a cumulative effect together with the Scheme; this includes various schemes such as residential, renewable (including BESS) and commercial for example.</p> <p>Cumulative effects have been assessed in each individual topic chapter and, for each topic where cumulative effects are possible with another development, this assessment is documented in a matrix (see Table 25.6 of <b>Chapter 25: Cumulative Effects and Effects Interactions [APP 062]</b>).</p>





## 7.11 Glint and Glare

**Table 7.11: Glint and Glare**

Reference	Issue	Comments/Issue Raised	Applicants Response
GLI-001	Animals	Comments referred to safety concerns for horse riders, warning that solar panels and associated visual distractions could trigger flight instincts in horses, increasing accident risks on rural roads.	<p>Please refer to the response to the following responses CRNBPC 002, EMPM-003, HoPC-014, HoPC-016 and SGHS-030 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> for responses to concerns on safety concerns for horse riders.</p> <p>As detailed in the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-162]</b> the British Horse Society advice from August 2025 contains a section on glint and glare: "The society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider." The view put forward by the British Horse Society is that, whilst there might be a reaction to new solar infrastructure, that is the same as a horse may react to anything that is different in their environment but is something that the horses quickly accept.</p>
GLI-002	Planning policy	Comments highlighted that the applicant incorrectly claims glint and glare are not referenced in EN-1.	The reference to glare within EN-1 located in paragraph 5.5.55 is in relation to artificial lighting



Reference	Issue	Comments/Issue Raised	Applicants Response
		While glint is not mentioned, glare is explicitly referenced, making the statement inaccurate.	<p>and so is not considered relevant to the glint and glare assessment</p> <p>Paragraph 5.5.55: Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting. Lighting may also need to be compatible with night vision devices for military low flying purposes.</p>
GLI-003	Methodology	<p>Comments noted that the applicant uses “professional judgement” over 20 times without providing assessment criteria or transparent reasoning. This reliance on unquantified opinion undermines objectivity and should be replaced with evidence-based analysis.</p> <p>Comments argued that limiting the assessment to 1 km is unjustified given the scheme’s vast area and proposed panel height of 4.5 m (with tracking capability). The original assessment was based on 2.1 m panels; therefore, a revised report is required to reflect increased visibility and potential glare impact over greater distances.</p> <p>Comments stated that the applicant provides no clear rationale for excluding glare modelling on local roads. Narrow, winding rural roads pose higher safety risks than trunk roads, yet these have</p>	<p>The assessment criteria is provided in Section 15.4 of the submitted ES <b>[APP-052]</b>.</p> <p>The 1km has been applied for consented NSIP developments. Beyond 1km, it is considered that the proportion of an observer’s field of view that is affected by glare is sufficiently diminished.</p> <p>As detailed in the <b>Glint and Glare Appendices [APP-155 to APP-165]</b>, the middle of the solar panel has been used as the assessed height in metres above ground level (1.95m for fixed tilt panels, 2.45m for tracking panels). These have been chosen as it represents the smallest possible variation in height from the bottom and top of the solar panels. The small variation in panel height will not change the conclusions of the report because the modelling results are unlikely to be meaningfully affected. When the visibility of the solar panels for ground-based receptors is discussed, the maximum height of the panel is</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		not been assessed, contrary to EN-3 paragraph 3.10.149.	considered since it will be the most visible part of the panel.  Reasoning is provided in paragraphs 15.6.4, local roads are considered to be of 'Low' sensitivity due to traffic volumes being predicted to be low. In accordance with good practice guidance (Solar Photovoltaic and Building Development – Glint and Glare Guidance, September 2022), technical modelling is not recommended for local roads, where traffic densities are likely to be relatively low. Any solar reflections from the Scheme that are experienced by a road user along a local road would be considered 'Low' impact magnitude.
GLI-004	Safety for transport users	Comments noted that while Public Rights of Way are referenced, there is no assessment of glare impacts on pedestrians using rural roads or on cyclists. Given the scale of the arrays, glare could cause loss of amenity and safety risks, breaching EN-3 requirements.	Please refer to the response to the following responses GLI-006 of the <b>Applicant Responses to Relevant Representations [REP1-161]</b> for responses to concerns on safety concerns for transport users.
GLI-005	Cumulative impacts	Comments highlighted that cumulative glare impacts have been dismissed, despite EN-3 requiring consideration of nuisance thresholds (30 minutes/day or 30 hours/year). The applicant only considers receptors within 1 km, ignoring wider visibility and cumulative exposure from multiple solar NSIPs.  Comments referred to the cumulative effect of industrial scale energy developments in operation	There are no such thresholds within EN-3 which are of relevance to glint and glare.  Cumulative effects have been considered in <b>Environmental Statement Chapter 15: Glint and Glare [APP-052]</b> . This assessment considers Sywell Road Solar Farm nearby Green Hill C, Green Hill D, and Green Hill E of the Scheme.



Reference	Issue	Comments/Issue Raised	Applicants Response
		or under construction and the impact it would have on the local communities.	This concludes that there are not considered to be any likely significant cumulative effects in conjunction with this development.
GLI-006	Heights	Comments highlighted that the glint and glare assessment omits impacts on sensitive receptors at elevated heights (first and second floor windows), breaching EIA requirements and leaving residents exposed without mitigation.	As outlined in <b>Environmental Statement Chapter 15: Glint and Glare [APP-052]</b> ground floor rooms are typically the location of the main living space within the dwelling. The ground floor rooms are therefore typically the most occupied part of residential dwelling during daylight hours and have a greater amenity significance than upper floors and so have been assessed within the glint and glare assessment.
GLI-007	Panel types	<p>Comments questioned the technical specifications of the solar panels (fixed or tracking).</p> <p>Comments raised uncertainty whether different sites will use lower-spec panels or mixed specifications within the same site.</p> <p>Comments suggested that anti-reflective technology is most effective only when the sun is directly overhead; noting that for most of the day/year, fixed panels will still cause glint and glare (G&amp;G) depending on sun position and observer location.</p> <p>Comments raised uncertainty whether Anti-Reflective (AR) coatings, surface texturing or Interdigitated Back Contact (IBC) cells will be used; and that there appears to be no investigation into the pros and cons of different solar panels.</p>	<p>As stated in <b>Applicant Responses to Relevant Representations [REP1-161]</b> The flexibility to use either fixed or tracker panels is set out in the <b>ES Chapter 4 Scheme description Rev A [REP1-031]</b>. It is unlikely that a mixture of the two types would be used in one site due to added complexity of construction, however this would be confirmed at detailed design stage if the application was consented. The max height of 4.5m is assessed in the LVIA and represents the worst-case scenario.</p> <p>Both tracker and fixed panels have been assessed in the Glint and Glare assessment <b>ES Chapter 15 Glint and Glare [APP-052]</b>.</p> <p>For the purpose of the glint and glare assessment, 'Smooth glass with Anti-Reflective Coating (ARC)' modules have been used to model the surface</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments acknowledge that single or dual-axis tracking panels may reduce G&G slightly but still create moving arcs of glare; however there is no definition of how this will vary throughout the year with sun movement and observer positions.	material of the arrays in order to ensure the worst case scenario is assessed.  The technical specification of the panel will be chosen at detailed design stage in line with the parameters assessed and defined in the <b>CDPP Revision A [REP1-152]</b> .
GLI-008	Glint and glare example	Comments highlighted Schiphol Airport runway closure due to solar farm glare, leading to major legal and financial consequences. Raising concern that similar issues in the UK could result in taxpayer liability for compensation or panel removal.	Concerns regarding Schiphol Airport were raised at the Issue Specific Hearing 1 and so is covered under Agenda Item 3.2. Effects for Landscape (including Design and Glint and Glare) of the Written Summary of the <b>Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-162]</b> .  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.



Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>There are no solar developments in the UK with northward-facing panels. All 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 in to 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.</p> <p>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 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."</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
GLI-009	Safety for aviation receptors	<p>Comments raised concern for Sywell Aerodrome: EFATO (Engine Failure After Take-Off) safety procedures compromised by extensive solar installations.</p> <p>Comments noted that Sywell hosts low-level Red Arrows displays and other VFR flights; suggesting that the high risk of glare may affect pilots flying in close formation, creating significant safety hazards.</p>	<p>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.</p> <p>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 is not located near any military airfields. There is no evidence of solar farms generating adverse glare effects on military pilots.</p>



## 7.12 Ground Conditions

**Table 7.12: Ground Conditions**

Reference	Issue	Comments/Issue Raised	Applicants Response
GRO-001	Contamination	Comments noted that panels contain hazardous substances (including lead, cadmium, antimony, and PFAS) that can leach into soil and water, posing long-term risks to drinking water, agriculture, and wildlife.	<p><b>ES Chapter 22 Ground Conditions and Contamination Chapter Revision A [REP1-025]</b> has included a full assessment and provided mitigation measures specific for potential spillages and leakages of fuels and chemicals, and for any leaching from faulty batteries (including fire damage, ash deposition and extinguishing waters). Assessment has been considered across the construction, operation and decommissioning phases of the scheme.</p> <p>Regular inspections and maintenance of battery storage systems and solar panels will be routinely undertaken to identify any signs of potential leakage, wear, or faults. This ensures early detection and rectification of issues, thereby minimising operational risks. Additionally, solar panels will undergo routine cleaning using water only, to prevent environmental contamination and maintain optimal performance.</p> <p>Real-time monitoring systems will be installed to continuously track the performance of the solar panels.</p> <p>No significant adverse effects have been assessed as likely.</p>
GRO-002	Unexploded ordnance	Comments cited historical use of the site as a USAAF bombing range and uncertainty about	Environmental Statement <b>Chapter 22: Ground Conditions and Contamination [REP1-025]</b> acknowledges that Green Hill G has potential unexploded ordnance risk due to its historical use as





Reference	Issue	Comments/Issue Raised	Applicants Response
		clearance of unexploded ordnance, posing safety hazards for workers and the public.	<p>Lavendon Practice Bombing Range and explosives demolition ground during WWII.</p> <p>Impartial Assessments' Detailed UXO Risk Assessment (Appendix 22.3) <b>[APP-187]</b> identifies heightened risks for activities such as percussive piling, borehole drilling, and mechanical excavation, particularly in regard to RAF and USAAF bombs and rockets. To mitigate these risks:</p> <ul style="list-style-type: none"><li>• A full site clearance will be undertaken before development to remove any identified munitions.</li><li>• The design will use concrete feet, eliminating deep intrusive works like piling and drilling.</li><li>• A UXO Risk Management Plan will be implemented, including site-specific UXO awareness briefings and supervision by a UXO specialist during excavations in high-risk areas.</li></ul> <p>These measures are included in the Construction Environmental Management Plan which is secured in 13 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b></p>
GRO-003	Topsoil	Comments pointed out that the developer's own report acknowledges low natural permeability at Green Hill G, comments suggest that this would result in importing approximately 57,000 tonnes of graded topsoil (requiring ~4,000 lorry deliveries), which is environmentally unacceptable.	The Applicant has not reported that Green Hill G has low natural permeability and does not believe that there is a need to import topsoil at Green Hill G.



## 7.13 Human Health

**Table 7.13: Human Health**

Reference	Issue	Comments/Issue Raised	Applicants Response
HUM-001	Mental Health and Wellbeing	<p>Comments raised concerns around the impact of the Scheme on the wellbeing of residents.</p> <p>Comments emphasized that the proposals would reduce opportunities for outdoor recreation, which supports mental health.</p> <p>Comments argued that large solar farms create unattractive views, discouraging walking and outdoor activities impacting wellbeing.</p> <p>Comments noted that frequent travel through these villages would expose residents to a semi-industrialized landscape, causing significant psychological impact over time.</p> <p>Comments noted that the scheme will reduce access to open green spaces, harming mental health and wellbeing.</p>	Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'HUM-006' with regard to the assessment of mental health and wellbeing matters, including access to open spaces.
HUM-002	Overall public health impacts	<p>Comments raised health concerns about dust, debris, and air quality affecting children during outdoor play and learning.</p>	The assessment undertaken in <b>ES Chapter 18: Human Health [APP-055]</b> considers a wide range of health determinants that consider the physical health and wellbeing impacts of the Scheme. This include, but are not limited to, impacts on health from changes to air quality, and from noise and vibration. No significant adverse effects to health and



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments noted the project will increase noise and air pollution in the area, impacting health	wellbeing are assessed as likely to occur at any phase of the Scheme.



## 7.14 Hydrology and Flood Risk

**Table 7.14: Hydrology and Flood Risk**

Reference	Issue	Comments/Issue Raised	Applicants Response
HYD-001	Pollution	<p>Comments raised concerns about battery storage safety at Green Hill C; highlighting fire risks and potential contamination of nearby watercourses (the brook) and Sywell reservoir, noted as one of the top tench fishing facilities and popular open water swimming venue.</p> <p>Grendon lies above an Oolite aquifer classified as "High" sensitivity, raising concerns about contamination of drinking water.</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'SGHS-014', and 'EA-008' with regard to Fire and contamination safety.</p>
HYD-002	Grendon flooding	<p>Comments noted that Grendon Brook flooded three times in September 2024 alone, contradicting the applicant's claim of a "1 in 100-year" flood event and "low" flood risk classification.</p> <p>Comments stated that Grendon experiences frequent flooding (2012, 2016, 2020, 2023, 2024) and warned that solar panels and associated infrastructure upstream will increase runoff and worsen flood risk for homes noting Main Road and Blackmile Lane.</p> <p>Comments suggested that Section 2.1.20 of Appendix 10.9 inaccurately claims flood extents remain within Grendon Brook's banks, despite evidence of regular overtopping and field inundation.</p> <p>Comments noted that the reports fail to incorporate recent evidence logged by the North</p>	<p>The Applicant has carried out hydraulic modelling for the Grendon Brook, River Nene and Field Drain to confirm that the BESS will be located in an area safe from flooding. Please refer to the Applicant's response to HYD-001, EA018 and EA-019 of the <b>Applicant's Response to Relevant Representation [REP1-161]</b>.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>Northamptonshire Flood and Water Management Team and Grendon Parish Council.</p> <p>Comments noted that no cumulative impact assessment is provided for hydrology changes across multiple solar and BESS developments in the catchment.</p>	
HYD-003	Lavendon flooding	<p>Comments referred to concerns about the potential impact of flooding in Lavendon; arguing that having a solar farm close to the village would; increase surface runoff; and worsen the risk of flooding.</p> <p>Comments questioned a complete flood assessment for Lavendon. Comments stated that correspondence with Greenhill Solar in 2024 promised a site-specific Flood Risk Assessment (FRA) and SuDS drainage strategy for Site G, but these measures were not included in the formal planning submission.</p> <p>Comments highlighted that Lower Farm and Lavendon Village lie within Flood Zone 3a and have a documented history of flooding, confirmed by previous FRA modelling and Environment Agency criteria.</p> <p>Comments noted that the assessment relies on a 2013 model based on 2012 flood data, which was low in impact compared to subsequent severe events (2020, 2023, 2024).</p> <p>Comments specifically referred potential increased run-off from the scheme; comments noted potential impacts to the beck; noting Castle Road, the Village</p>	<p>The Applicant recognises the recorded flooding history within Lavendon and the surrounding catchment. This baseline is described in <b>ES Chapter 10 Hydrology Flood Risk and Drainage [REP1-023]</b> and informed the assessment approach for Site G.</p> <p>A site-specific flood risk and drainage assessment for Site G has been completed and is presented in <b>Flood Risk Assessment and Drainage Strategy Annex I Green Hill G [APP-107]</b>, with the overall methodology and catchment context set out in the <b>FRA and Drainage Strategy Report [APP-097]</b>. These documents provide the detailed assessment that consultees refer to. No commitment has been made to produce a separate stand-alone SuDS report for Site G outside the submitted FRA suite.</p> <p>The FRA uses FEH design rainfall, site topography, national soils mapping and the established greenfield runoff calculation methods expected by the Environment Agency and Lead Local Flood Authorities. These data sources are the required standard for catchment scale hydrological assessment. Local anecdotal flood records do not replace the design datasets required for planning and</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>centre and flow of traffic along the A428 Bedford to Northampton road.</p> <p>Comments raised concern about increased flood risk from solar panels and the battery storage facility, noting potential impacts on local brooks, springs, and the River Nene, and stated no adequate flood-risk study has been provided.</p> <p>Comments referenced an independent flood-risk report by a Chartered Engineer for Green Hill Site G, which found deficiencies in the developer's assessment and concluded the scheme could raise flood levels.</p> <p>Comments noted that the developer relied on desktop data rather than on-site soil and drainage testing, ignored historic flood events, and misclassified parts of the catchment area.</p> <p>Comments highlighted that Site G's shallow topsoil over impermeable clay already drains poorly, and adding solar panels would increase runoff velocity and volume.</p> <p>Comments described poor soil permeability at Site G, with shallow clay topsoil over dense limestone and blue clay, high water table, and natural springs, making infiltration and attenuation inadequate.</p> <p>Comments stated that no hydrological modelling was provided to demonstrate the scheme's safety and that cumulative impacts with other sites were not considered.</p>	<p>would not be accepted for determining runoff rates or drainage capacity.</p> <p>Site G does not include impermeable surfacing beneath the solar panels. The FRA confirms that the panelled area maintains a permeable grassed surface, access tracks are permeable, and runoff from infrastructure is controlled to greenfield rates through the drainage principles set out in <b>[APP-097]</b> and <b>[APP-107]</b>. The Scheme therefore does not introduce any hydrological mechanism that would increase downstream flows to Lavendon. This conclusion is consistent with paragraph 3.10.75 of NPS EN-3, which states that solar PV panels drain to existing ground and that their hydrological effect is not, in general, significant.</p> <p>The independent engineer's report cited by the representor has been reviewed. Its conclusions rely on simplified assumptions regarding impermeable area, runoff concentration and catchment behaviour that do not reflect the Scheme design or the drainage regime assessed in <b>[APP-107]</b>. Assertions regarding increased flood levels are not supported by the evidence base used in the FRA.</p> <p>The shallow topsoil and clay horizons noted by representors are captured within the hydrological soil classifications used to derive greenfield runoff rates. These datasets, together with FEH rainfall and site levels, provide the accepted basis for assessing both infiltration potential and runoff. The FRA confirms that the development does not increase flow to the</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>Comments argued that the reports are too narrow in scope, focusing only on installation resilience rather than community flood risk.</p> <p>Comments concluded that the developer's claim of "negligible impact" is unsupported and recommended excluding Site G until full site-specific modelling and infiltration testing are completed.</p>	<p>ordinary watercourse north of Site G and that baseline connectivity is unchanged.</p> <p>Cumulative effects with the wider Scheme are considered in <b>ES Chapter 10 Hydrology Flood Risk and Drainage [REP1-023]</b>, which concludes that no cumulative pathway exists that would increase flood risk to Lavendon or other downstream receptors.</p> <p>On this basis, the FRA submitted with the application provides the complete and proportionate site-specific assessment for Site G, and demonstrates that the Scheme will not exacerbate existing flooding within Lavendon.</p>
HYD-005	Electrical concerns	<p>Comments referred to flood risk concerns; noting severe flooding issues in Grendon and Lavendon and questioning whether the danger of electricity combined with flood water has been considered.</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'MAJ-004' with regard to good practice measures.</p> <p><b>ES Chapter 10 Hydrology Flood Risk and Drainage [REP1-023]</b>, the <b>Flood Risk Assessment and Drainage Strategy Report [REP1-053]</b> have informed the safe design of the Scheme.</p>
HYD-006	Ground conditions	<p>Comments highlighted that the reports only consider flooding impacts on solar arrays, not on altered soil conditions caused by construction.</p> <p>Comments noted that the developer claims negligible flood risk based on Flood Zone 1 classification, but local ground conditions are largely impermeable and prone to significant surface-water runoff during heavy rainfall.</p>	<p>Ground conditions and soil structure have been fully considered within the assessments submitted with the application. <b>ES Chapter 10 Hydrology Flood Risk and Drainage [REP1-023]</b>, the <b>Flood Risk Assessment and Drainage Strategy Report [REP1-053]</b>, and the parcel specific annexes including <b>Annex I Green Hill G [APP-107]</b> all recognise that local soils have low permeability and generate surface water runoff during intense rainfall. These soil characteristics are embedded within the FEH</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>Comments raised concern that compacted ground, access tracks, and heavy machinery will reduce natural water absorption, increasing surface water run off and put a strain drainage systems.</p> <p>Comments referenced University of Nottingham research showing ploughed fields have 25% higher porosity and 16% greater infiltration than consolidated clay soils.</p> <p>Comments noted that combined impermeable surfaces, increased traffic, and multiple battery installations within the same catchment amplify runoff concentration and surface water flooding risks.</p> <p>Comments stated that the applicant provides no mitigation proposals for additional surface water discharge caused by soil compaction and impermeable tracks.</p> <p>Comments referred to flood risk and drainage issues; noting failure to address surface water run-off from solar panels, breaching NPPF Paragraphs 159–169 and Local Plan drainage policies.</p>	<p>catchment descriptors and hydrological soil classifications used to derive greenfield runoff rates. These datasets are the accepted national standard and are required by the Environment Agency and Lead Local Flood Authorities for planning assessments.</p> <p>The FRA does not rely solely on Flood Zone 1 classification. The assessment considers the potential for construction related compaction and confirms that this is a temporary effect controlled through the measures set out in the <b>OCEMP Revision A [REP1-131]</b> and <b>OSMP [APP-550]</b>. These secured documents require the protection of topsoil, restricted trafficking, and reinstatement to pre-construction condition, preventing any lasting change to infiltration capacity.</p> <p>Access tracks are permeable and do not introduce impermeable surfacing. The areas of permanent hardstanding associated with infrastructure are minimal and are drained at controlled greenfield runoff rates in accordance with <b>[REP1-053]</b>. The FRA therefore includes mitigation for any additional runoff associated with built infrastructure.</p> <p>The FRA does not identify any hydrological mechanism by which solar panels would increase runoff. The land beneath the panels remains permeable, drip gaps spread rainfall, and the grassed surface provides interception and soil binding. This is consistent with the established position in NPS EN-3 paragraph 3.10.75 that rainfall from PV panels drains</p>





Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>onto the existing ground and that the effect on runoff is not, in general, significant.</p> <p>Cumulative effects, including the BESS compounds, are considered in <b>ES Chapter 10 [REP1-023]</b> and the FRA suite. The BESS areas have impermeable lined drainage systems that isolate the compound from the wider drainage network during an incident. Outside incident conditions they discharge at controlled greenfield rates. They do not increase downstream flow.</p> <p>The assertions regarding non-compliance with NPPF or Local Plan drainage policies are not supported by the evidence presented. The FRA follows national policy and guidance, demonstrates that the Scheme will not increase flood risk elsewhere, and provides an appropriate and proportionate assessment of surface water, soil conditions and drainage.</p>



## 7.15 Landscape and Visual Impact

**Table 7.15: Landscape and Visual Impact**

Reference	Issue	Comments/Issue Raised	Applicants Response
LAN-001	Change to countryside and character of landscape	<p>The scale and nature of the Schemes operation and associated construction were claimed to alter the rural character of the countryside, with specific reference to villages such as Earls Barton, Mears Ashby, and Lavendon.</p> <p>Concerns were raised about negative impacts on the area's overall character, appearance, and landscape, including loss of residential amenity and tranquillity due to increased traffic and visual intrusion from construction and maintenance vehicles.</p> <p>Comment raised concern of major visual intrusion from solar panels and industrial-style containers in a rural setting</p> <p>Comments highlighted that the development would industrialize the wider area, harming rural identity and views along routes between Mears Ashby, Grendon, Easton Maudit, and Bozeat, and across multiple villages (Mears Ashby, Easton Maudit, Bozeat, Walgrave).</p> <p>Objections were made to the use of Areas C, D, and E, which act as an informal green belt between Wellingborough and Northampton, warning that development would remove this important buffer.</p>	<p><b>ES Chapter 8: Landscape and Visual Impact [APP-045]</b> takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15).</p> <p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'SGHS-066 and SGHS-026' with regard to landscape considerations.</p> <p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'HaPC-001' with regard to recognition of the shift from open agricultural farmland to large scale solar infrastructure.</p> <p>Measures for the implementation, management and monitoring of landscape and ecological mitigation are set out in the <b>OLEMP Revision A [REP1-137]</b>.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments referred to conflict with NPPF Paragraph 174 and Local Plan policies requiring protection of valued landscapes and rural character.	
LAN-002	Associated infrastructure	Visual impacts associated with glare from panels, security lighting, and fencing, particularly for Highfield Road Footpath, were noted.	<p>The LVIA has considered the construction, operational and decommissioning lighting proposals (as set out within Chapter 4 Scheme Description and further discussed in Chapter 24: Other Environmental Matters) for the Scheme including details of directionality and intermittent lighting.</p> <p>Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes.</p> <p>Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats.</p> <p>Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning.</p> <p>The design includes security fencing placed along the parameter boundary of the Sites consisting of deerstock fencing comprising of wire and mesh and wooden post fencing with a maximum height of</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>2.5m. The high voltage compounds, where there is a risk of loss of life, are to be contained by palisade fencing around the compound with a maximum height of 3m.</p> <p>The Scheme proposes to use fencing in tandem with enhancement to boundary features such as ditches and hedgerows along roads to provide natural defences. Further site-specific detail on these measures is to be provided in the detailed CEMP and OEMP as secured by Requirements 13 and 14 in Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>. Requirement 10 also requires the approval of proposed temporary and permanent fencing and other means of enclosure.</p>
LAN-003	Planting mitigation	<p>Comments raised concerns about the need for more native screening to mitigate visual effects.</p> <p>The scheme was described as inconsistent with Northamptonshire's rolling agricultural landscape and historic hedgerow pattern.</p> <p>Comments observed that the Landscape and Ecology Mitigation Plan (Figure 4.20) appears blank, preventing meaningful comment on mitigation measures.</p>	<p>Proposed mitigation planting would be of native species, with measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation set out in the <b>OLEMP Revision A [REP1-137]</b>.</p> <p>The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the <b>Draft DCO Revision A [REP1-008]</b>.</p>



## 7.16 Major Accidents and Disasters

**Table 7.16: Major Accidents and Disasters**

Reference	Issue	Comments/Issue Raised	Applicants Response
MAJ-001	Emergency response	<p>Comments expressed serious safety concerns about the BESS, citing fire risk, toxic gas release, and noise/light pollution.</p> <p>Comments referred to environmental and safety risks from battery storage, noting no clear emergency response protocol established for local services.</p> <p>Concerns were raised about the lack of a clear Emergency Response Plan and inadequate consultation with local fire authorities.</p> <p>Comments raised safety concerns about battery storage facilities at Grendon, citing potential fire risks during increasingly hot, dry summers.</p> <p>Comments criticised the applicant's emergency plan as inadequate, noting that advising residents to "remain indoors" during a fire is not a credible safety measure.</p> <p>Comments referred to health and safety concerns; citing fire and pollution hazards from the Battery Energy Storage System (BESS) near flood-prone land and questioning if approved, will local response services be enlarged and receive additional specialist training.</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'MAJ-002' with regard to BESS Safety considerations.</p> <p>Following a series of engagement with Northamptonshire Fire and Rescue Service a Statement of Common Ground has been agreed and signed by both the Applicant and Northamptonshire Fire and Rescue Service <b>[EX2/GH8.3.8]</b> which has been provided at Deadline 2.</p> <p><b>The OBSSMP Revision A [REP1-143]</b> submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard.</p> <p>The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments noted that reliance on remote management could delay emergency response, especially given the site's proximity to villages and its location in Flood Zone 3.	<p>Examples of potential ERP protocols contained in Sections 5.5.10 – 5.5.13 in the OBSSMP are examples taken from the Plume Study report which are appropriate for the very low emission levels modelled at sensitive receptor locations.</p> <p>ERPs can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.</p> <p>Section 5.4.4 of the OBSSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including:</p> <p><i>“Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure.”</i></p> <p>An Emergency Response Plan will be developed post planning consent to facilitate effective and safe emergency response. It will follow UK National Fire Chiefs Council and National Fire Protection Agency 855 guidance. This is further detailed in response MAJ-003 of <b>Applicant's Response to Relevant Representation [REP1-161]</b>.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'SBMP-004' with regard to BESS locality and hydraulic modelling. Responses 'SGHS-014, SGHS-014 and EA-008' outline details regarding Fire and contamination safety.</p> <p>Section 4.3 of the OBSSMP documents the responsibilities of the onsite control rooms and 24/7 remote control facility. A 24/7 remote facility is required by NFCC and NFPA 855 guidance / standards, this facility allows for quick and effective incident response when onsite control rooms are not operational.</p>
MAJ-002	BESS safety	<p>Fire hazards from lithium-ion batteries were highlighted, including thermal runaway risks during increasingly hot, dry summers.</p> <p>Comments warned that flooding could cause battery failure or explosion, releasing toxic gases such as hydrogen fluoride and carbon monoxide.</p> <p>Prevailing south-west winds could carry toxic fumes toward Grendon and surrounding farms.</p> <p>Numerous BESS fire incidents worldwide were cited, undermining claims of "state-of-the-art" safety systems:</p> <p>Missouri (Oct 2024): Advanced suppression systems failed; 24-hour firefighting operation.</p> <p>San Diego (Aug 2024): Evacuations up to one mile; fire took 48 hours to control.</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'MAJ-002' with regard to BESS Safety considerations.</p> <p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'SBMP-004' with regard to BESS Fire Emissions.</p> <p>The Applicant emphasises that the safety risks of BESS are well established in 2025; the Electric Power Research Institute (EPRI) BESS Failure Incident Database was established in 2021 as an information tool for both energy storage industry stakeholders and the public. Statistically, the significant global increase in BESS deployments means that there will be a likely increase in the number of failure events. However, BESS failure rates dropped by 98% from 2018 to 2024 as lessons learned from BESS failure events have been incorporated into BESS design, testing requirements,</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>Moss Landing (Jan 2025): 80% facility loss; 1,200 residents evacuated; fire reignited a month later.</p> <p>UK examples include Liverpool (2020), Essex (Feb 2025), Aberdeenshire (Feb 2025), and Claregalway (Jan 2025), showing increasing frequency as BESS proliferation grows.</p> <p>Comments argued that the BESS industry lacks clear governance and standardised design safety protocols.</p> <p>Claims of fail-safe systems were described as unsubstantiated and should not be accepted without exhaustive independent testing and verification.</p>	<p>control and monitoring systems, safety standards, and construction and operations best practices.</p> <p>Electric Power Research Institute (EPRI), <i>Insights from Battery Energy Storage Systems (BESS) Failure Incident Database: Analysis of Failure Root Cause</i>, identified four primary root causes of BESS failure with the majority occurring in early lifecycle stages i.e. construction, commissioning, or within two years of operation. The Applicant emphasises that the EPRI research concluded that the primary cause of failure was rarely the battery cells or modules, and the <b>OBSSMP Revision A [REP1-143]</b> is drafted to address all key safety risk reduction topics to ensure that comprehensive BESS fire and explosion hazard prevention and mitigation strategies can be developed and implemented.</p> <p>Several of the examples stated involved battery systems housed in buildings which are not relevant to the Green Hill Scheme, these and other examples stated involved air-cooled pouch cell battery systems which will not be considered for the Scheme. Air cooled, pouch cell systems were involved in 31 from 91 BESS failure events listed in the EPRI database. In 31 BESS failures recorded in South Korea between 2017-21 these systems were integrated in 18 (58%) BESS failures but only accounted for 30% of total BESS systems installed. Confirmed global BESS failures listed on the EPRI database (outside of South Korea) integrating these battery systems are 12 significant failure incidents at facilities in Drogenbos (Belgium), McMicken (AZ, USA),</p>





Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>Carnegie Road Liverpool, 3 failures at Moss Landing (CA, USA), and 2 failures at Valley Center (CA, USA).</p> <p>The Applicant confirmed that as mandated in NFPA 855 (2026) published in September 2025, that at the detailed design stage the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT of the selected BESS design is conducted to establish minimum equipment spacing distances (no fire propagation to adjacent BESS or infrastructure) and site specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with Northamptonshire Fire and Rescue Service (NFRS).</p> <p>The OBSSMP key safety risk reduction content is contained in the following sections listed below:</p> <ul style="list-style-type: none"><li>• Section 2: 2.3 Potential BESS Failure, 2.4 Safety Objectives, 2.5 Relevant Guidance.</li><li>• Section 4: BESS safety requirements through the lifecycle of the Scheme including: Battery System Enclosure design (4.1.23 - 4.1.28), Detection and Suppression Systems (4.1.29), Explosion prevention and control systems (4.1.30), 4.2 Safe BESS Construction, and 4.3 Safe BESS Operation and decommissioning.</li></ul>



Reference	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>Section 5: All aspects of NFRS potential firefighting considerations for the Scheme including Emergency Response Planning and Risk Management template requirements.</li><li>Section 6: Pre-Construction Information Requirements the Applicant will provide including key Risk and Hazard Mitigation Analysis studies listed in Sections 6.1.3, 6.1.4, and 6.1.5.</li></ul>
MAJ-003	Water supply	<p>NFCC guidance requires hydrant supplies capable of delivering <math>\geq 1,900</math> litres per minute for at least two hours, but the application provides no plan for hydrant installation or water supply.</p> <p>Fire tenders typically carry only 2,000 litres, exhausted within minutes; thermal runaway fires can last hours or days, requiring millions of litres of water. Comments acknowledges the following example: Otago Mesa BESS fire (2024) required 8 million gallons over 17 days.</p>	<p>Fire water provisions is outlined in Section 5.3 of <b>the OBSSMP Revision A [REP1-143]</b>. Each BESS area will contain a minimum of two firefighting water storage units of no less than 230,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance). This is also outlined and secured in the <b>CDPP Revision A [REP1-151]</b>.</p> <p>A range of recent Large Scale Fire Tests (LSFT) has demonstrated that the typical BESS failure fire event with battery systems at a high State of Charge (SOC), the peak fire conditions have lasted for a period spanning 60-150 minutes. The rest of the testing fire events within the BESS enclosures typically lasted another 6-8 hours at a lower intensity. Because BESS enclosure designs have very high levels of thermal insulation approximately up to 24 hours of smouldering involving non battery combustibles may occur within BESS structure. No intervention is necessary from firefighters in these low intensity burn scenarios.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			<p>Section 5.3.2 of the <b>OBSSMP Revision A [REP1-143]</b> stipulates that each BESS area will contain 4 hours water supply.</p> <p>If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these “boundary cooling” tactics would likely be applied intermittently in 15-minute application periods with temperature changes measured between application periods.</p> <p>The firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer and water storage volumes will be fully agreed with NFRS.</p> <p>Section 5.3.2 of the OBSSMP also stipulates:</p> <p><i>If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated, water runoff is likely to contain higher levels of pollutants compared to water used for external boundary cooling of BESS and ESS equipment. All process water used in the system shall be prevented from contaminating potable water sources in accordance with local regulations through the use of check valves or other means as part of the system design. Pollution analysis will be conducted before removing and treating offsite.</i></p>



Reference	Issue	Comments/Issue Raised	Applicants Response
MAJ-004	Unexploded ordnance	Comments noted potential hazards from unexploded ordnance due to historic USAAF activity in the area during World War II.	Please refer to the 'GRO-002' with regard to unexploded ordnance.
MAJ-005	Cumulative impacts	Concerns were raised about cumulative risk, with three battery sites clustered around Grendon significantly increasing the likelihood of a serious incident.	Please refer to <b>ES Chapter 25: Cumulative Effects and Effects Interactions [APP-062]</b> for cumulative impact assessment with the proposed BESS site in the Grendon area; the existing facility forms part of the baseline environment considered within relevant ES chapters.



## 7.17 Noise and Vibration

**Table 7.17: Noise and Vibration**

Reference	Issue	Comments/Issue Raised	Applicants Response
NOI-001	Construction noise	<p>Concerns were raised about noise and vibration from pile-driving, percussion-driven hammers, and heavy machinery during construction.</p> <p>Specific issues included reversing alarms, engine idling, and heavy vehicle movements, which were cited as disruptive.</p> <p>Comments objected to construction noise causing distress and interfering with home-based work and therapy sessions requiring quiet environments.</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'NOI-002' with regard to the assessment of construction noise.</p> <p>The assessment undertaken in <b>ES Chapter 18: Human Health [APP-055]</b> considers a wide range of health determinants that consider the physical health and wellbeing impacts of the Scheme. This include, but are not limited to, impacts on health from noise and vibration. No significant adverse effects to health and wellbeing are assessed as likely to occur at any phase of the Scheme.</p> <p><b>Environmental Statement Volume 1, Chapter 14: Noise and Vibration [APP-051]</b> has considered the assessment of likely significant effects in respect to noise and vibration of the site during <i>construction</i>. The assessment is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of the Scheme and nearby existing sensitive receptors. Noise predictions and subsequent assessments of impacts have been carried in accordance with current policy and guidance, and the methodology discussed and agreed with all relevant statutory bodies.</p> <p>In respect to construction noise, the assessment results predict that noise levels from the Scheme are predicted to relevant threshold criteria at the closest sensitive receptors during the daytime and night-time periods with the appropriate mitigation measures incorporated. This is an indication of a Moderate/ Minor effect and <b>not significant</b>.</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			The Technical Addendum to <b>Chapter 14: Noise and Vibration [REP1-168]</b> includes further consideration of noise and vibration associated impacts with Horizontal Directional Drilling. The addendum confirms following the implementation of mitigation secured in the <b>OCEMP Revision A [REP1-131]</b> noise and vibration effects will be considered to be not significant.
NOI-002	BESS noise	Comments referred to significant noise from battery cooling systems during operation.	<b>ES Chapter 14 Noise [APP-051]</b> includes a noise assessment for the BESS scheme, highlighting that with the appropriate mitigation measures incorporated noise levels are predicted to be below the background noise levels. Further sensitivity testing is included in the Noise Technical Addendum [REP1-168], confirming there will be no significant effects from BESS noise.
NOI-003	Noise methodology	<p>The noise assessment was criticized for failing to model outdoor operational noise and omitting second-floor bedrooms, which are more acoustically vulnerable due to thinner construction and elevated exposure.</p> <p>Concerns noted that the assessment assumes partially open windows, understating worst-case scenarios, and lacks transparency on façade sound insulation performance.</p> <p>Comments argued that tonal corrections were dismissed based on manufacturer data rather than perceptibility at receptors, which was considered procedurally flawed.</p>	<p><b>Environmental Statement Volume 1, Chapter 14: Noise and Vibration [APP-051]</b> has considered the assessment of likely significant effects in respect to noise and vibration of the site during operation (<i>as well as construction, and decommissioning phases of the Scheme</i>). The assessment is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of the Scheme and nearby existing sensitive receptors. Noise predictions and subsequent assessments of impacts have been carried out in accordance with current policy and guidance, and the methodology discussed and agreed with all relevant statutory bodies.</p> <p>In respect to construction, operational and decommissioning noise, the assessment results predict that noise levels from the Scheme are predicted to be no higher than the representative background noise levels at the closest</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
		Comments stated that the Environmental Statement does not comply with BS 8233:2014, WHO guidelines, or Planning Practice Guidance (Noise), omitting significant harm to residents and animals.	<p>sensitive receptors during the daytime and night-time periods with the appropriate mitigation measures incorporated. This is an indication of a Moderate/ Minor effect and <b>not significant</b>.</p> <p>It should be noted that daytime modelling/assessment considers noise incident levels on the façade at a high of 1.5m above ground level, and night-time incident levels on the façade at a high of 4m, taking into account daytime and night-time living.</p> <p>With regards to open window, whilst the maximum permissible window opening area would be dependent on the window type, size, and angle of opening, research by Napier University (and used in other industry standard guidance) shows that an open window at a 20-40% opening angel can achieve a 15dB reduction. It is worth noting that the noise assessment for this scheme assuming a 10dB reduction across a partition with a partially open window.</p> <p>When assessing the sound insulation performance of an external building fabric system, it is generally regarded that, with the exception of '<i>lightweight</i>' façade systems that are typically used for industrial sheds, the glazing element is the weakest path for external noise intrusion into internal areas. As such, the acoustic performance of the glazing will be the most critical element in determining the overall sound insulation performance of the external façade because the proposed external wall is masonry.</p> <p>With respect to the penalty correction, whilst manufacturer data has been considered to determine whether there are expected to be any tonally features, it is considered that any intermittency associated with the proposed operations is</p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			unlikely to be readily distinctive against the residual environment. Therefore, an acoustic penalty correction has not been included within the BS 4142:2014+A1:2019 assessment.





## 7.18 Other Environmental Matters

**Table 7.18: Other Environmental Matters**

Reference	Issue	Comments/Issue Raised	Applicants Response
OEM-001	Solar panel waste	<p>Comments noted that solar panels have a lifespan of approximately 25–30 years, after which disposal can be problematic because not all components are easily recyclable.</p> <p>Concerns were raised about the cost and disruption involved in removing old or low-efficiency panels.</p> <p>Comments referred to environmental impacts of solar panel manufacturing, highlighting the use of hazardous materials and high energy consumption during production.</p> <p>Recycling and waste concerns were emphasized, citing limited and costly recycling options in the UK and the risk of panels ending up in landfill.</p> <p>It was noted that the UK currently has only one solar panel recycling facility, and around 90% of panels end up in landfill rather than being recycled. Comments cited that experts warn that by 2050, the UK could face millions of tonnes of solar panel waste, creating an ecological disaster without scalable recycling infrastructure.</p>	<p>Please refer to response to OEM-003 and OEM-004 of <b>The Applicant's Responses to Relevant Representations [REP1-161]</b> with regard to solar panel recycling.</p> <p>The replacement of panels has been considered within <b>Chapter 24: Other Environmental Matters [APP-061]</b>.</p> <p>During the operational phase, the Scheme will adhere to the waste hierarchy by prioritising waste prevention, followed by the reuse, recycling, and recovery of equipment during the replacement of components. Landfill disposal will be considered only as a last resort. A Waste Management Strategy will be developed and agreed with the authority prior to commencement of the operation (including maintenance) as part of the detailed <b>OOEMP Revision A [REP1-133]</b>. All waste management will comply with relevant regulations, and waste will be transported by licensed hauliers to authorized waste management sites with the necessary permits for the consigned wastes.</p> <p>It is expected that, with increasing uptake of solar panels leading to an eventual increase in expired panels, private sector waste companies will develop further facilities to meet market demands.</p> <p>The company 'Recycle Solar' reports that 90% of the glass and 95% of the semiconductor materials in end-</p>



			<p>of-life solar panels can be recovered for use in new panels.</p> <p>The <b>Draft DCO Revision A [REP1-008]</b> contains a requirement (requirement 21) for a Decommissioning Plan to be produced. Such a plan would include requirements for recycling.</p>
OEM-002	Battery waste	<p>Comments noted that lithium-ion batteries have a lifespan of 8–13 years, requiring 6–7 replacements during the facility's operational life.</p> <p>The applicant does not address potential future upgrades (e.g., transition to sodium-ion technology) or environmental risks from disposal of redundant cells, given global shortages of recycling facilities and high costs of repurposing.</p> <p>Without a viable recycling solution, obsolete batteries risk ending up in landfills, causing long-term contamination.</p>	<p>As noted in OEM-001 replacement has been considered within <b>Chapter 24: Other Environmental Matters [REP1-027]</b>. It has been assumed that Batteries would be replaced up to five times during the lifetime of the scheme.</p> <p>Equipment that requires replacement during the operational phase will be managed in line with the waste hierarchy and in accordance with legislation in force at the time, with materials re-used or recycled wherever possible (as secured by the OEMP). Any electrical waste produced by the Scheme will be disposed of in accordance with the Waste from Electrical and Electronic Equipment (WEEE) regulations, minimising the environmental impact of replacing any Schemes elements.</p> <p>The UK market for Lithium-ion (Li-ion) battery recycling is developing, driven by the rapid increase in electric vehicles and other Li-ion battery users. Several new investments have been announced, and an 80% recovery rate is reported.</p> <p>As with solar panels, it is expected that private sector waste companies will develop greater facilities to meet market demands for battery recycling.</p>



## 7.19 Principle of Development

**Table 7.19: Principle of Development**

Reference	Issue	Comments/Issue Raised	Applicants Response
PRI-001	Land use	Comments referred to concerns that the land being used will one day be classified as a brownfield site	Based on current policy, the land use is not changed from agricultural land, and as such, there is no policy position for the land to be considered 'brownfield' or 'previously developed'.
PRI-002	General	Comments were generally objecting the Scheme.  Comments claimed the Scheme will change the countryside forever.	The Applicant notes these comments, and hopes to have addressed the commenters' concerns throughout this response document.
PRI-003	General	Comments broadly supported the use of solar panels to generate sustainable energy.	The Applicant notes these comments and welcomes support for the Scheme.
PRI-004	Solar efficiency	Comments noted that solar farms rarely achieve rated capacity; UK capacity factors average 10–12%, requiring backup generation (often gas) or imports during low sunlight.  Comments noted that output is constrained by daylight hours, weather, soiling, shading, inverter reliability, and grid curtailment.  Comments noted that solar farms produce excess energy in summer and insufficient energy in winter, creating grid management issues.  Comments referred to concerns about the inefficiency of solar panels; noting that	Please refer to response to CPRE-005 and CPRE-009 in regard to generation comments.  NESO also ensures that power demand, or load, and power supply, always remain balanced. The Scheme does include BESS, which supports the operation of the main solar scheme and can also be used to balance supply and demand over short time periods (e.g. milliseconds to days). BESS may import energy at times when demand is lower than supply or export energy when demand is higher.  Section 9.4 of the <b>Statement of Need [APP-556]</b> addresses curtailment and concludes that transmission constraints are unlikely to cause curtailment at the Scheme.



Reference	Issue	Comments/Issue Raised	Applicants Response
		energy generation decreases significantly on cloudy days.	



## 7.20 Socio-Economics, Tourism and Recreation

**Table 7.20: Socio-Economics, Tourism and Recreation**

Reference	Issue	Comments/Issue Raised	Applicants Response
SOC-001	Property value	Comments referred to a potential decrease in property values as a result of the Scheme.	Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'SOC-009' with clarification of why property value has not been assessed.
SOC-002	Impact on tourism	Concerns were raised about negative impacts on local tourism, reducing the area's appeal to both local and national visitors.	The Applicant has assessed tourism and recreation receptors most likely to be impacted by the Scheme in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b> . This includes local businesses and facilities reliant on visitors where it is anticipated that the Scheme may directly impact upon their ability to operate, and on individual tourism and recreation receptors such as local attractions, PROWs, and sports venues. Industry impacts to accommodation and food business, cultural facilities, and sports and recreation business more generally have been considered in the likely effect on visitor spending. The greatest level of effects to tourism are anticipated during the Scheme's construction, during which it is assessed there is a likely impact of a loss of up to 29 FTE jobs, equivalent to a loss of up to £1.66 million in visitor spending per annum in the Study Area. This is equivalent to 0.16% of the tourism economy in the assessed area, and is therefore not anticipated to be significant.
SOC-003	Public Right of Way	Comments objected to the closure and diversion of public rights of way during construction, including the Three Shires Way and ancient footpaths and bridleways.	Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'HUM-001' in respect of access to PROWs, mitigation measures during construction, and access to the countryside for wellbeing.



Reference	Issue	Comments/Issue Raised	Applicants Response
		<p>Footpaths were noted as essential for residents' wellbeing and local tourism, forming part of the internationally recognized Waendel Walk route, which attracts visitors and supports businesses.</p> <p>Comments highlighted loss of access for cycling, running, and dog-walking, reducing opportunities for outdoor recreation and harming community life.</p> <p>Closure of the walking route to Castle Ashby, the only accessible shop by foot, during the two-year construction period would force residents to use cars, increasing traffic and removing vital non-motorised access.</p> <p>Concerns were raised about loss of pedestrian connectivity and lack of clarity on maintaining safe, direct, and well-signed footpaths during construction.</p>	<p>With specific regards to the what the Applicant is doing to ensure the minimisation of impacts to the International Waendel Walk, please refer to the <b>Applicant's Response to ExA First Written Questions Q19.0.1-19.0.3 [REP1-163]</b>. The Applicant has furthermore been in direct contact with Wellingborough Town Council as the event organisers to ensure protective mitigation measures during construction are satisfactorily agreed. These are secured through the <b>OCEMP Revision A [REP1-131]</b> by Requirement 13 of Schedule 2 to the <b>Draft DCO Revision A [REP1-008]</b>.</p>
SOC-004	Mental health and wellbeing	<p>Comments referred to harm to residential amenity and wellbeing, citing disruption to community life and lack of meaningful engagement beyond statutory minimum, contrary to NPPF Paragraph 130.</p> <p>Comments warned that restricting footpaths will harm community wellbeing, increase traffic on narrow roads, and damage local tourism.</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'HUM-001, HUM-005, and HUM-006' in respect of assessment of impact on amenity, wellbeing, and access to leisure facilities.</p> <p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'CON-001' in respect of the scope and adequacy of community consultation undertaken.</p> <p>Impacts on tourism have been assessed in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b></p>



Reference	Issue	Comments/Issue Raised	Applicants Response
			and its <b>appendix (Revision A) [REP1-079]</b> . Significant adverse effects are largely able to be mitigated against, with the exception of long distance recreational routes during the Scheme's construction and decommissioning, due to their level of importance.
SOC-005	Security and crime	Concerns were raised about rural crime risks, suggesting large-scale projects may attract criminal activity and increase vulnerability of local communities.	Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'NNC-079 to NNC-081' with clarification of why crime has not been assessed, and what security measures are included as part of the Scheme.
SOC-006	Impact to equestrian facilities	The proximity of the proposed solar farm to Lower Farm will have dire consequences for the owners who run stabling and equestrian activities.	Equestrian businesses and facilities with public access (such as riding schools) likely to be impacted by the Scheme have been assessed in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b> due to their economic and recreational function.



## 7.21 Transport and Access

**Table 7.21: Transport and Access**

Reference	Issue	Comments/Issue Raised	Applicants Response
TRA-001	Existing network	<p>Concerns were raised about the suitability of local roads for construction traffic, noting that many are narrow, have weight limits are flood-prone rural lanes with limited visibility, tight bends, and no passing places.</p> <p>Specific issues included Highfield Road and the use of five access points, which were considered to have a significant impact.</p> <p>Glebe Road was highlighted as at risk of becoming a “rat run” to avoid Highfield Road, with suggestions that the junction may require four-way traffic lights. Comments warned that small businesses along Glebe Road will suffer due to reduced customer access and delays, threatening their viability.</p> <p>Comments referred to risks from abnormal loads and HGVs on minor roads, particularly through Wilby and Mears Ashby, and questioned how large battery components for the BESS could be delivered given current road constraints.</p> <p>Comments raised concern around Olney High Street which is already congested, specifically referencing Sainsburys and Warrington roundabouts.</p> <p>Comments raised concern around the A428 bend near the church in Lavendon as a weak spot; more</p>	<p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at ‘SBMP-008 and SAMP-008’ with clarification of the route choice for HGVs and management of HGVs.</p> <p>The <b>Transport and Access Routes Supporting Document [REP1-167]</b> provides further information on the site accesses for Green Hill D off Highfield Road.</p> <p>The Applicant has assessed tourism and recreation receptors most likely to be impacted by the Scheme in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix Revision A [REP1-079]</b>. This includes local businesses and facilities reliant on visitors where it is anticipated that the Scheme may directly impact upon their ability to operate, with no significant adverse effects anticipated.</p> <p>The Abnormal Indivisible Loads (AIL) Routes have been proposed by Wynns, a consulting engineering firm specialising in the transportation of AILs. The AIL Assessment is included as Appendix D of the <b>Transport Assessment Parts 2 and 3 [APP-152]</b> and <b>[APP-153]</b>. This demonstrates that the proposed routes are able to accommodate the size of AIL movements required at each location.</p>





		HGVs will heighten danger for drivers and pedestrians.	
TRA-002	Access to sites	<p>Comments query access F-2 and CR23 and specific details of the routes to these accesses and what types of vehicles would use these accesses. Comments questioned how construction traffic would be stopped from accessing the village to reach Access F-2 and CR32.</p> <p>Comments suggest that Easton Maudit is impassable to large lorries appears not to have been considered. The existing road from Bozeat to Grendon, via Easton Maudit, is not suitable for large construction traffic.</p> <p>Comments noted that Access CR21 is on a single-track road that is not suitable for any large traffic.</p> <p>Comments noted that access F-1 and Access F-3 are positioned off the existing A509 (Wellingborough to Milton Keynes route), but it is not clear how these will be constructed and what volume of construction traffic would use these access points in preference to others. Comments suggested that HGV traffic should use these access points and not be allowed into Bozeat village to access Easton Lane.</p> <p>Comments suggested that Table 7.1 indicates that Easton Lane would be used for abnormal loads of 95 tonnes; it is unlikely that the existing highway bridge over the A509 Bozeat bypass would be designed to take this weight and again one would question why these abnormal loads have not been</p>	<p>For comments on accesses F-2, CR23 and CR21 please refer to Section 2 of the <b>Transport and Access Routes Supporting Document [REP1-167]</b> which provides clarification of the HGV routes to the proposed accesses.</p> <p>Access F-1 is an existing access on the A509 and is a wide priority junction with a right hand turn island. As set out in Drawing 23061-KMC-XX-AF1-DR-CH-0001_C in Appendix C of the <b>Transport Assessment [APP-151]</b>, there are no proposed improvements to this access.</p> <p>Access F-3 is an existing priority junction access on the A509. As set out in Drawing 23061-KMC-XX-AF3-DR-CH-0001_C included in Appendix C of the <b>Transport Assessment [APP-151]</b>, the existing access is capable of safely accommodating HGV movements but would need to be widened on the southern kerb to facilitate cable drum deliveries. The upgrade of the junction would require temporary traffic management, which would need to be agreed with the local highway authority as part of any application for a road space permit under the New Roads and Street Works Act 1991 (NRSWA).</p> <p><b>Environmental Statement Figure 13.22 AIL Routes to Solar and BESS Sites Green Hill BESS F G [REP1-127]</b> shows the AIL route for Green Hill F. The AIL Routes have been proposed by Wynns, a consulting engineering firm</p>



		<p>planned to use Access F-1 and Access F-3 off the A509.</p> <p>Comments questioned what the long term use of crossing points are, will there be gates, with operatives in attendance, or will these be fitted with automatic traffic lights, and will these be operational for working hours only, and for how many days a week ?</p>	<p>specialising in the transportation of AILs. The AIL Assessment is included as Appendix D of the <b>Transport Assessment Parts 2 and 3 [APP-152]</b> and <b>[APP153]</b>. This demonstrates that the proposed routes are able to accommodate the size of AIL movements required at each location.</p> <p>Table 13.10 of the <b>ES Chapter 13 Transport and Access Revision A [GH6.2.13_A]</b> summarises the use of the accesses and crossing points in terms of construction and operational phases of the project. The HGV routes to the accesses must be adhered to under the <b>OCTMP Revision A [REP1-145]</b>.</p> <p>In regard to construction movements please refer to Table 13.13 which outlines the forecast construction traffic (HGVs) for sites and Table 13.14 which outlined the forecast construction traffic (workers) for sites.</p>
TRA-003	Safety concerns	<p>Safety concerns were raised for vulnerable road users, including Special Needs pupils at Wilby School and families walking to Grendon CE Primary School, due to heavy site traffic during peak school hours.</p>	<p>An assessment of construction traffic is provided in <b>ES Chapter 13 Transport and Access Revision A [EX2/GH6.2.13_A]</b>. This includes consideration of traffic accident data, and a quantitative and qualitative review of the effects of construction traffic associated with the Scheme. HGV routes have been positively selected to avoid passing local schools.</p> <p>The HGV routes are not proposed through Grendon. However, there may be a limited number of worker movements routing through Grendon. The response to Q20.0.4 in <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> summarises the proposed measures to</p>



			manage worker movements to avoid school drop off and pick up times.
TRA-004	General	<p>Comments referred to concern regarding disruption and safety risks to local communities.</p> <p>Comments suggested that increased traffic, noise, and debris will significantly affect residents' living conditions.</p>	<p>The response to Q20.0.9 and Q20.0.10 in <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> set out how traffic will be managed to minimise the effect of the construction phase on local communities.</p>
TRA-005	Construction impacts	<p>Comments noted that years of construction will involve heavy machinery, HGV traffic, and up to 800 workers daily, causing noise, congestion, and damage to rural roads.</p> <p>Comments raised concerns about inadequate traffic assessments, raising concern around no clear traffic flow figures highlighting risks to school routes and pedestrian safety.</p> <p>Questions were raised about how funerals and weddings at All Saints Church will avoid disruption from construction noise and traffic restrictions.</p> <p>Concerns were raised about congestion during school pick-up and drop-off times at Mears Ashby Primary School, potentially deterring parents from applying and impacting school viability.</p> <p>Comments questioned the vehicle movements, suggesting section 3.2 only refers to HGV movements; querying the peak construction number, Paragraph 3.2.4 mentions both 787 and 1,099 workers (40% difference), creating confusion about which figure is correct.</p>	<p>The <b>OCTMP (Revision A) [REP1-145]</b> summarises how construction traffic will be managed.</p> <p>The response to Q20.0.4 in <b>Applicants Responses to ExA First Written Questions [REP1-163]</b> summarises the proposed measures to manage worker movements to avoid school drop off and pick up times.</p> <p>As illustrated in <b>ES Chapter 13 Figure 13.5_A HGV Routes to Scheme Sites South Area [REP1-121]</b>, All Saints Church in Earls Barton is not on an HGV route.</p> <p>The <b>Transport and Access Routes Supporting Document [REP1-167]</b> provides further information on the HGV routes to each access during the construction phase.</p>



		<p>Comments suggest that there is no clear information on expected routes or access points.</p> <p>Comments note that the OCTMP assumes no on-site accommodation for workers, meaning all workers travel daily.</p> <p>Comments noted the village has no pavements, forcing residents to drive, and predicted severe delays from roadworks during construction, further isolating the community.</p>	
TRA-006	Transport management	<p>Prolonged construction disruption was emphasized, citing dust, mud, blocked roads, lack of HGV parking, and severe delays affecting commuting, school runs, and extracurricular activities.</p> <p>Comments noted that there is no provision for suitable waiting or parking areas for HGVs before arriving at the site. Current highways lack spaces for vehicles to park and wait for pre-agreed delivery slots.</p> <p>Comments criticized the OCTMP for lacking clarity on key issues affecting residents and businesses, calling for a full, detailed traffic management plan to be subject to public consultation before approval.</p> <p>Concerns noted that the Transport Plan assumes all HGVs will arrive between 09:00 and 15:30, which was considered unrealistic given potential delays and breakdowns, with no provision for vehicles arriving outside these hours.</p>	<p>The <b>OCTMP (Revision A) [REP1-145]</b> includes wheel washing facilities and visual inspections of the public highway in the vicinity of the site accesses, which will be undertaken on a daily basis by the site manager. Where inspections identify visible deposits of mud, dust, or debris on the public highway, or where concerns are raised by the local highway authority, a road sweeper will be deployed promptly to remove such material.</p> <p>The <b>OCTMP (Revision A) [REP1-145]</b> provides a framework for the management of construction vehicle movements to and from the Scheme. It will ensure that the effects of the construction phase are minimised. The OCTMP sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures.</p> <p>Please refer to the <b>Applicant's Response to Relevant Representation [REP1-161]</b> at 'MFr-009' for details of the commitment of condition surveys.</p>



		<p>Comments queried where parking at construction compounds would be as the distances appear impractical.</p> <p>Comments queried internal haul routes, suggesting these are not indicated on maps.</p> <p>Station Road was highlighted as flooding annually, cutting off access from the A45, with no contingency plan provided for HGV access during flood events.</p> <p>Comments warned that reliance on satnavs will likely lead to large vehicles using village roads, causing congestion, damage to road surfaces, and risk to residents' vehicles.</p> <p>Comments stated that since the OCTMP appears to cover only construction works will there be a separate plan will address ongoing maintenance during the project's life and later removal/reinstatement works.</p>	<p>The <b>OCTMP (Revision A) [REP1-145]</b> includes management of deliveries to ensure deliveries are arranged to occur after 09:30 and before 16:30. Drivers will be instructed to not leave their depot, or alternatively stop in an appropriate layby or other appropriate stopping place, and report if they are likely to miss their slot.</p> <p>Drivers will be provided with the relevant routing, temporary road signage will be installed along the construction traffic routes to inform all road users of the construction works and to direct construction traffic to and from the various construction accesses. Details of the form and proposed locations of any signs (or signals) to be placed on a public highway will be pursuant to relevant Articles of the <b>Draft DCO Revision A [REP1-008]</b> and will be submitted to the traffic authority for approval in advance of being placed.</p> <p>The detailed CTMP, to be approved by the relevant planning authority, is secured in Schedule 2, Requirement 15 of the <b>Draft DCO Revision A [REP1-008]</b>.</p> <p>The <b>OCTMP Revision A [REP1-157]</b> sets out how traffic will be managed during the operational phase, including the replacement activities.</p>
TRA-007	Traffic Restriction Orders and Routing	<p>Concerns were raised about construction traffic potentially being routed along Billing Road in Brafield on the Green, which is subject to TRO 1499 prohibiting vehicles over 7.5 tonnes.</p> <p>Comments stated that routing heavy vehicles along Billing Road would breach the TRO and</p>	<p>The <b>Transport and Access Routes Supporting Document [REP1-167]</b> provides clarification of the HGV routes proposed. Billing Road in Brafield on the Green is not part of the proposed construction HGV routes.</p>



		<p>create serious safety risks for pedestrians due to narrow footpaths and vehicles passing within inches.</p> <p>Billing Road was described as completely unsuitable for HGVs, with warnings of potential damage to road surfaces and residents' vehicles.</p> <p>Requests were made for planning conditions prohibiting construction traffic from breaching the TRO and requiring the applicant to ensure all contractors are aware of the restriction.</p>	
--	--	---	--

