

Wellingborough Walks Action Group Limited



Date : 19th November 2025

I write on behalf of Wellingborough Walks Action Group re-Greenhill Solar application EN010170. With the following further comments regarding the impacts of the possible arrival of the proposed Greenhill Solar scheme.

In our last submission to the Examiners we mentioned concerns on a number points related to the protection and sustainment of trees, hedgerows and woodland likely to be impacted if this development is given the go ahead, and a DCO granted.

Understanding the Full Extent of Proposed Hedgerow Removal

Many of the points made related to tree protection mitigations that could straightforwardly be deployed by the scheme proposer. We also touched on issues related to impacts on the community, local bio-diversity, and natural habitat if the many hedgerows earmarked by the developer where to be removed, and warned at a 'higher level' of these impacts.

Since then, we have had more time to study the proposals mention in the draft DCO (see schedule 12, p 97 to 126) and to start to understand the astonishing extent of the possible clearing of healthy, historic and important hedges of all categories across the entire area of this scheme, that the developer is seeking permission to remove (if required).

In the past few days we have studied each of the sheets of the Hedgerow and Tree Protection Order Plan (APP 016), mapped hedgerow code numbers listed from page 97 of the draft DCO document (APP 017) on each chart, and then highlighted the next to the hedgerows to be removed. We were shocked to see that in most cases up to 95% of all hedgerows of all categories, including the most important hedges, were to be removed.

The loss could mean thousands of meters of vital hedgerow from all areas of the scheme being removed, leaving most of the sites with less than 5% of all existing hedges. It would be a devastating loss for any community (and all the diverse species that reside here) if just one area of hedgerow is lost but to lose virtually all hedges across the large expanse that is this scheme, (within each site) would be a considerable blow to human, flora and fauna a like, and substantial set-back for most flood prevention mitigation strategies deployed across the entire scheme, many of which feed into the river nene, and are highly vulnerable to flooding.

This impact also runs counter to the information provided by the Applicant in respect of restricting hedgerow loss that we have seen in the various submissions, and that I heard at the ISH1 hearing on 22nd October 2025.

(Please see figures 1, 2, 3 below which highlight the potential loss across a few of the sites). The pink lines highlight the hedges in each site mentioned for removal in the draft DCO document.



Fig1 – Site A – Possible hedgerow loss

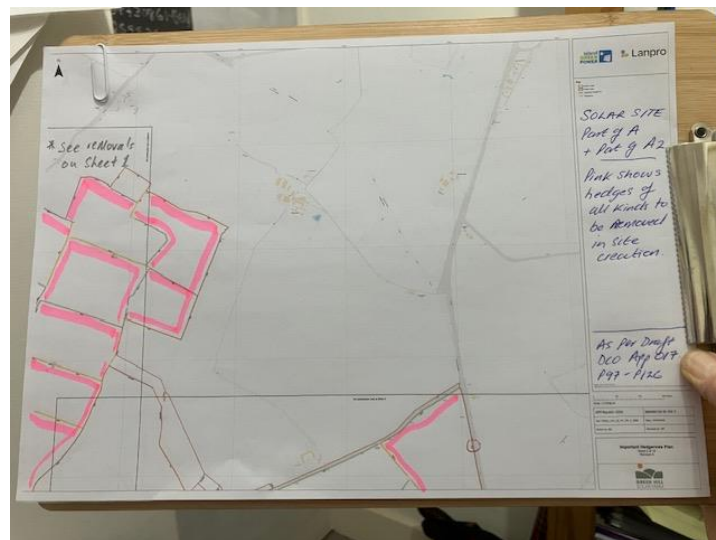


Fig 2 – Site A to A2 – Possible hedgerow loss

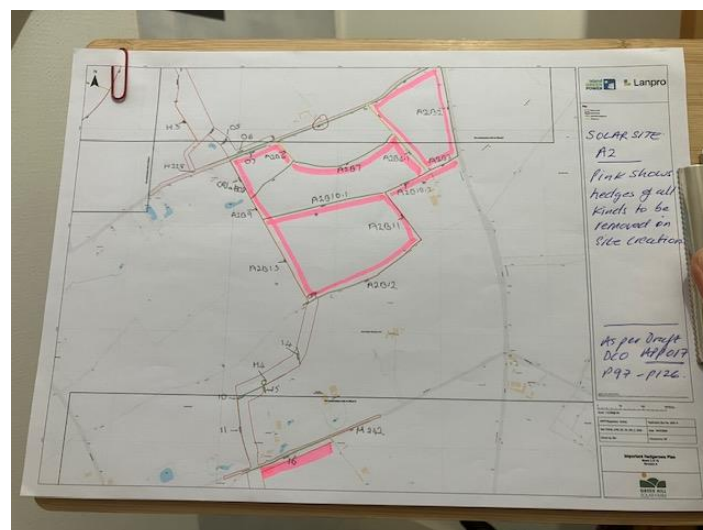


Fig 3 – Site A2 – Possible hedgerow loss

Having seen the extent of the potential losses I contacted the GHS Team and sought clarification regarding these proposals. They replied sharing extracts from the BNG assessment appendix (**EX1/GH6.3.9.13_A_APP**) which states the following (Section 1.8: Proposed Hedgerows):

1.8.1 Hedgerow loss has been avoided wherever possible through sensitive design of the Scheme. This includes the utilisation of existing access points wherever possible, as well as the use of existing tracks to cross fields, in order to minimise hedgerow losses wherever this can be avoided.

The DCO Schedule lists all the hedgerows and the lengths that are within the Order Limits. This provides flexibility to remove as much of each hedgerow as is needed and also ensures there aren't limitations to where along the extent of hedgerow removal may take place. The broad DCO power is limited by article 40(4) confirming that the hedgerows in the Schedule may be removed "to the extent set out in the landscape and ecological management plan approved pursuant to requirement 7".

Section 1.2 sets out that hedgerow removal will be of 3-10m stretches, and the exact extent will be confirmed post-DCO. As the detailed LEMP must be substantially in accordance with the OLEMP, the much more limited overall removal of hedgerows is secured.

1.8.4 In total, approximately 350m of existing hedgerow is anticipated to be lost across the Sites. All remaining hedgerows within the Sites will either be retained or enhanced.

Our Response:

Whilst it is a relief to hear that the developer plans to clear no more than 350m of hedgerow across the entire scheme it is concerning that the clearance of thousands of meters of hedgerow could be noted and 'accepted' given the inclusion of this schedule in the agreement if this DCO application is accepted by the Planning Inspectorate.

We are concerned that this 'acceptance' within the DCO (should it happen) may confer direct permission to the developer to do much more hedgerow clearance than presently stated (or expected), and having this permission will enable or embolden the developer to go much further than initially planned. We have seen locally that once developers have permission for action, many planning conditions, let alone smaller agreements, are often overlooked by overstretched planning departments and in developer's eagerness to deliver scheme areas often at pace.

We request that not such open-ended permission is given to the Applicant at this stage (ie within the DCO process), and instead, should the DCO be approved, the Applicant should seek permission for Hedgerow removal during the detailed delivery stage (via the Local Planning Authority) once the precise requirements of each site are known, and exact plans for field opening a cable channel crossings are more clearly known.

In our previous submission we talked about our concerns about the potential high level of tree loss across the site. Having further checked with the GHS Team about our estimates of tree loss, it appears that their initial estimates did not include smaller trees in hedgerows. Given this, depending on the level of hedge clearance works the Applicant ultimately decides upon. It is likely (regardless of the level of extent) that even more trees will also be lost as hedgerows are cleared. This will worsen our original tree loss

estimates and create further impacts on top of hedgerow loss upon the local landscape, flora and fauna, and bio-diversity net gain assumptions by the applicant.

Given the above, the points we raised in our last submission regarding hedgerow removal and its negative impact on the landscape, other species, and communities, as well as flood and climate impacts through loss of these CO2e storage 'sinks', will be further heightened if the Applicant is given permission to include the full list of hedge removal noted in schedule 12 of the draft DCO. And whilst it is hoped they would exercise significant restraint, this could not be guaranteed. We hope then that you will heed our request to limit permission at this stage.

Thank you for your time

Best wishes

Marion

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