

# **Green Hill Solar Farm**

## **EN010170**

### **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses**

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## Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 3

### Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses

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## 1 Introduction

### 1.1 Purpose of the Document

- 1.1.1 This document provides Green Hill Solar Farm Limited's (the 'Applicant's') response to oral submissions made to the Planning Inspectorate (PINS) at Open Floor Hearing 1 (OFH1), held 9 December 2025. These hearings provided the opportunity for registered Interested Parties (IPs) and other local people to make oral representations about the application. Each IP making an oral submission was requested to provide a written summary note to the ExA for Deadline 3 (17 December 2025).
- 1.1.2 The following people and organisations were present and made submissions at the OFH1: Laura Cooper on behalf of friends and neighbours in Mears Ashby, Nick Frampton, Kay Brown, Dawn Partridge and Victoria Jane Smith.
- 1.1.3 This document sets out the Applicant's response to the comments made at the OFH 1. The comments have been grouped by speakers making oral representations. Where multiple representations cover the same topic area, a detailed response will only be provided for the first occurrence. Where the Applicant has made commitments on the topic, the relevant application documentation is identified. This document also provides a written summary of the oral submissions made on behalf of the Applicant at OFH 1 in the time allocated by the Examining Authority.
- 1.1.4 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](#).
- 1.1.5 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 3 to the Planning Inspectorate.

### 1.2 Summary of the Applicant's Oral Submissions at OFH1

- 1.2.1 Claire Brodrick, Partner at Pinsent Masons LLP, on behalf of the Applicant thanked the IPs for attending the hearing and for their very detailed and eloquent submissions across a variety of different topics.
- 1.2.2 Ms Brodrick advised that the Applicant would respond in writing to the submissions, including signposting with cross-references to relevant documents. Some of the points raised have been considered in more detail in the Issue Specific Hearings. Cross-references to the written summaries will be provided, including for Issue Specific Hearing 1 **[REP1-162]** which dealt with a number of points that were raised today, in particular in relation to the treatment of footpaths and permissive paths and how those will be laid out, fencing and where that will be located, and the potential for a sense of enclosure and how that will be managed in the design of the Scheme.
- 1.2.3 In addition, in today's Issue Specific Hearing 2 **[EX3/GH8.1.20]**, the Applicant provided detailed comments on BESS safety matters and the outline battery storage safety management plan **[REP1-143]**, which sets out the measures to prevent fire incidents and the procedures to follow should a fire occur.



- 1.2.4 A number of comments raised today relate to traffic. The Applicant provided at the last deadline a comprehensive set of plans showing each of the construction traffic routes (see Transport and Access Routes Supporting Document **[REP1-167]**). Traffic regulation measures are being discussed in detail with the local highway authority, and agreement will be documented in the Statements of Common Ground. It is typical for the detailed design of DCO projects to take place at the post consent stage and to be approved by the relevant planning authority, and any necessary road safety audits will need to be supplied at that point in time.
- 1.2.5 In relation to supply chain standards, Requirement 20 in the draft DCO provides for skills, supply chain and employment. There is an outline management plan **[APP-552]**, and a detailed plan setting out further details on the supply chain will be submitted to the relevant planning authorities post consent.
- 1.2.6 The DCO process is effectively equivalent to an outline planning permission in that the detailed design is dealt with post consent. However, the outline management plans that are submitted as part of the DCO application are live documents and they are being amended as the Examination progresses specifically in response to comments made by stakeholders, by the local planning authority and by interested parties. Where concerns have been raised or interested parties have specific suggestions on the drafting of those management plans, the Applicant recommends they put these in their written submissions so that the Applicant can consider these.
- 1.2.7 In relation to the Community Benefit Fund, at the moment this has to sit outside of the DCO process. A Community Benefit Fund is not a planning consideration that the Examining Authority or the Secretary of State can take into account. There are measures being consulted upon to bring into place a compulsory community benefit scheme, but this is not yet in force. The Applicant, as is the case with the majority of large-scale solar developers, is voluntarily providing a Community Benefit Fund, the detail of which will be confirmed post consent.





## 2 Summary of Matters Raised in Oral Submissions at Open Floor Hearing 1 and the Applicant's Responses

### 2.1 Laura Cooper

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LC-001	General matters	Planning process	<p>Ms. Cooper raised concerns about the registration process to speak, suggesting the process is hard and highlighted that many residents would have attended and voiced their views if they knew they had the opportunity and knew how to register.</p> <p>Further concerns were raised around the lack of transparency throughout the process that many people were disappointed.</p>	The Applicant notes this comment.
Comments on behalf of friends and neighbours in Mears Ashby				
LC-002	Ecology and Biodiversity	General concerns about wildlife	<p>Comments on behalf of R. Brock.</p> <p>Concerns were raised regarding the potential disruption of hedgerows and impacts to local wildlife; noting a diverse range of species, specifically, red kites, buzzards, kestrels and even osprey. Populations that the ecology and conservation efforts of Sywell reservoir tries hard to support.</p>	Impacts on hedgerows have been minimised through sensitive Scheme design wherever possible. As a result, only approximately 350m of the hedgerows within Green Hill A to G and BESS are anticipated to require removal, which constitutes less than 0.5% of the total hedgerow network across these Sites. In addition, a protective ecological buffer of 15m has been incorporated on either side of all retained hedgerows in order to protect them from degradation during construction, and maximise their value for



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>biodiversity during the operational phase of the Scheme.</p> <p>A suite of breeding and wintering bird surveys have been completed across the Sites to inform the assessment of impacts on bird species. The survey data are provided in Environmental Statement <b>Appendix 9.8 Breeding Bird Surveys (Revision A) [REP1-051]</b> and <b>Appendix 9.9 Wintering Bird Surveys [APP-092]</b> respectively. These data were then used to inform the assessment of impacts on these species, which is provided in <b>Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]</b>. Separate assessments have been completed for both breeding and overwintering birds associated with open habitats, boundary habitats, and wetland habitats, respectively (provided in <b>paragraphs 9.9.242 - 9.9.308</b>).</p> <p>In addition, a separate assessment has been undertaken to identify potential impacts on Sywell Reservoir and Country Park Local Wildlife Site, which is provided in <b>paragraphs 9.9.52 - 9.9.64</b> of the <b>Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]</b>. The outcome of this assessment was that, following the implementation of embedded mitigation measures, no significant adverse effects on this site were anticipated as a</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				result of the construction or operational phases of the Scheme.
LC-003	Human Health	Mental wellbeing	<p>Comments on behalf of the Houghtons.</p> <p>Comments referred to concerns about potential disruption to regular running routes due to the construction of the Scheme; noting that these routes are relied upon for physical and mental wellbeing.</p> <p>Comments referred to concerns that the changes could make regular running routes in the area unsafe.</p>	<p>The assessment in <b>ES Chapter 18: Human Health [APP-055]</b> considers the physical and mental health and wellbeing impact of changes to the use and enjoyment of PROWs and access to the countryside as open space and leisure space, and finds no likely significant adverse effects at any phase of the Scheme, subject to mitigation measures set out in the <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision B) [EX3/GH7.10_B]</b>.</p> <p>For non-motorised users of the local highway network (such as runners or cyclists), mitigation measures in the <b>Outline Construction Traffic Management Plan (Revision B) [EX3/GH7.9_B]</b> seek to ensure the safety of non-motorised users of the highway network is not significantly affected, with HGVs limited to specified routes, as set out in the <b>Transport and Access Routes Supporting Document [REP1-167]</b>.</p>
LC-004	Human Health	Safety and wellbeing	<p>Comments on behalf of H. Wyman.</p> <p>Comments referred to support for renewable energy but expressed concerns about the Scheme's impact on the village; particularly concerns around</p>	<p>Please refer to the Applicant's response to 'LC-003' above in respect of walking and running routes, and to Q20.0.4 in the Applicants Responses to <b>ExA First Written Questions [REP1-163]</b> with regard to targeted transport mitigation around schools.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>disruption to countryside walks and running routes.</p> <p>Comments referred to the potential strain on the community which is facing challenges to attract and retain pupils at the local school.</p> <p>Comments were raised about increased congestion and traffic on an already hazardous road.</p> <p>Comments highlighted concern for the wellbeing and safety of residents, especially children.</p>	<p>The routes that construction HGV traffic will take have been confirmed and clarified in <b>Transport and Access Routes Supporting Document [REP1-167]</b>. This confirms that HGV movements will not pass through Mears Ashby and that construction workers will be directed towards other routes.</p>
LC-005	Human Health	Safety and wellbeing	<p>Comments on behalf of O. Cooper.</p> <p>Comments referred to concerns about increased danger for cyclists commuting to Northampton and using local village routes; noting that many residents cycle regularly in the area.</p> <p>Comments referred to concerns that the scheme would make cycling unsafe and diminish the enjoyment of open roads, which is important for physical and emotional wellbeing.</p> <p>Comments referred to concerns about impacts on local wildlife in surrounding fields, including foxes, deer, and a white owl frequently seen on Highfield Road.</p>	<p>Please refer to the Applicant's response to 'LC-003' above in respect of cycling on PROWs and the local highway network in respect of cycling as a form of commuting transport, and for recreational cycling, and the assessment of physical and mental health and wellbeing associated with access to open space and leisure (and play) in the countryside.</p> <p>Please refer to the Applicant's response to <b>FC-008</b> in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b> for details relating to impacts on deer.</p> <p>Like deer, foxes are also not considered priority species of conservation concern, and are therefore not considered an Important</p>



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			Comments referred to concerns about the scale of the project, noting that if it were in one road or area, it would be easier to digest.	<p>Ecological Feature (IEF). However, the reversion of the existing arable land to permanent grassland (as well as the range of other habitat creation measures delivered through the Scheme) is likely to benefit foxes through an increase in the abundance of small mammals within the Sites, which they predate. Solar security fencing is also considered permeable for mammals such as badgers and foxes.</p> <p>Barn owl <i>Tyto alba</i> (the presumed 'white owl' referred to) is considered within the assessment relating to 'Breeding Birds of Boundary Habitats' in <b>Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]</b>. Please also refer to measures detailed in the <b>Outline Ecological Protection and Mitigation Strategy (Revision A) [REP1-138]</b> relating to the protection of barn owls during construction, including pre-commencement inspection of buildings or trees which may be impacted by construction work, either directly or indirectly (Section 6.3 refers).</p> <p>As set out in <b>ES Appendix 5.1: Site Selection Assessment Revision A [REP1-037]</b>, 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</p>



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				<p>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. This is considered by the Applicant to be a viable cable connection distance for a solar project of this scale.</p> <p>As outlined in <b>Chapter 5: Alternatives and Design Evolution [APP-042]</b> 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> <p>Please refer to the response to NNC-004 in the <b>Applicants Responses to Relevant Representations [REP1-161]</b> in regard to the</p>



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				scale of the scheme and benefit of the dispersed nature of the sites.
LC-006	Alternatives and energy need.	Alternative locations.	<p>Comments on behalf of A. Bellamy.</p> <p>Comments referred to support for solar power but expressed objections to the proposed siting of panels, noting alternative locations.</p> <p>Comments referred to concerns that once constructed, the scheme would replace farmland, resulting in the loss of countryside views and local habitats.</p> <p>Comments referred to concerns that the energy generated would not benefit the local community but be exported elsewhere.</p> <p>Comments referred to concerns that solar farms may be sold multiple times to non-local buyers with little regard for local residents.</p>	<p>Please refer to the Applicant's response to <b>ALT-009</b> in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b> for details relating to site selection, consideration of alternatives and the use of agricultural land.</p> <p>Please refer to the Applicant's response to <b>HaPC-001</b> for details relating to landscape and visual effects and MAPC-007 for details on ecological habitats in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b>.</p> <p>Please refer to the Applicant's response to <b>NNC-085</b> for details relating to community benefits and <b>SAMP-009</b> in matters relating to economic and ownership concern in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b>.</p>
<b>Laura Cooper Comments</b>				
LC-007	Transport and Access	Construction impacts on Mears Ashby School	<p>Ms Cooper raised concerns about Mears Ashby Primary School, noting its vulnerability as a small village school.</p> <p>Ms Cooper referred to concerns that construction related traffic controls, including temporary three or four-way lights at Glebe [Road] and Highfield Road, would cause significant delays</p>	<p>The routes that construction traffic will take have been confirmed and clarified in <b>Transport and Access Routes Supporting Document [REP1-167]</b>. This confirms that HGV movements will not pass through Mears Ashby and that construction workers will be directed towards other routes thereby avoiding the school.</p>



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			<p>during school drop-off and pick-up times. Further suggesting that increased congestion could deter families from sending their children to the local school, risking a decline in pupil numbers and potential closure.</p> <p>Ms Cooper referred to safety concerns related to increased traffic around North Street, referring to a dangerous bend, and highlighted that this would undermine ongoing efforts to reduce speed limits for child safety.</p> <p>Ms Cooper also referred to concerns about the direct impact of construction activity on the school environment, including dust, debris, and noise affecting outdoor learning spaces such as the recently built outdoor classroom.</p>	<p>The <b>Outline Construction Traffic Management Plan (Revision A) [REP1-145]</b> also includes a commitment towards restricting construction vehicle activity during school pick-up and drop-off times in areas where this is likely to be of specific relevance. The detailed CTMP to be approved post consent will confirm any specific requirements as part of future agreements with the local highway and planning authorities.</p> <p>Whilst the <b>Draft DCO Revision C [EX3/GH3.1_C]</b> allows for appropriate traffic management solutions to facilitate construction, there are currently no plans to implement temporary three or four-way lights at Glebe Road and Highfields Road.</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 construction, phases of the Scheme. The assessment is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of the Scheme and nearby existing sensitive receptors. Noise and vibration predictions and subsequent assessments of impacts have been carried in accordance with current policy and guidance, and the methodology</p>



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				<p>discussed and agreed with all relevant statutory bodies.</p> <p>The assessment results predict that noise and vibration levels from the Scheme are predicted to be an indication of a Moderate/ Minor effect and not significant.</p> <p>All appropriate precautions to minimise the potential for disturbance to the occupiers of neighbouring properties in terms of noise and vibration during the construction phases of the development have been included and are set out in Table 3.8 of the <b>Outline Construction Environmental Management Plan Revision A [REP1-131]</b>.</p> <p>A dust risk assessment has been carried out in accordance with best practice guidance to determine appropriate mitigation measures, as outlined in <b>ES Appendix 16.1: Construction Dust Methodology and Assessment [APP-166]</b>. With the implementation of these measures, construction dust effects are predicted to be not significant. These best practice measures are included in the <b>Outline Construction Environmental Management Plan Revision A [REP1-131]</b>.</p>
LC-008	Landscape and Visual	Mental wellbeing	Ms Cooper referred to concerns about the impact of the scheme on mental health and wellbeing, highlighting the importance of access to natural spaces,	The assessment in <b>ES Chapter 18: Human Health [APP 055]</b> considers the physical and mental health and wellbeing impact of changes to the use and enjoyment of PRowWs





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		Loss of view / visual impact	<p>specifically Green Hill D and the Public Right of Way along Highfield Road.</p> <p>Ms Cooper raised concerns that these changes would remove the sense of peace, solitude, and safety. While access to the same footpath may technically remain once in operation, concerns noted that the scheme would replace open fields with man-made structures, fences, and CCTV, creating an oppressive tunnel.</p> <p>Ms Cooper also referred to the loss of safe space for passing dogs and horse riders, thus removing the ease and safety that makes the walks so restorative.</p> <p>Ms Cooper raised concerns about the contradiction between encouraging young people to spend more time outdoors and the loss of open spaces due to the proposed solar farm. Further noting that reduced access to natural environments could exacerbate issues such as vitamin D deficiency, which is already being observed among children who spend excessive time indoors.</p>	<p>and access to the countryside as open space and leisure space, and finds no likely significant adverse effects at any phase of the Scheme, subject to mitigation measures set out in the <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision B) [EX3/GH7.10_B]</b>.</p> <p>PRoW TN 003 traverses Green Hill D north-south, with a definitive route adjacent to a small watercourse, and a de facto (on the ground) parallel route approximately 50 m to the east. During the Scheme's operation, both routes are to be maintained as shown on in <b>ES Figure 4.13.1_Landscape and Ecology Mitigation Plan C and D Option A [EX3/GH6.4.4.13.1_A]</b>.</p> <p>The definitive footpath route is enclosed to the west by hedgerow and hedgerow trees following the course of a local tributary. To the east, the footpath is exposed within the agricultural landscape with views towards Highfield Road to the east and in parts glimpsed views to Glebe Road to the west.</p> <p>The definitive route of PRoW TN 003 is typically located c.70 m west of the proposed fenceline. This corridor between the watercourse and the fenceline has been utilised to create an attractive green corridor along the route of the PRoW. The landscape scheme uses new woodland copses and</p>



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				<p>shelterbelts set within tussocky grassland and new riverside planting along the watercourse to provide visual separation from the proposed infrastructure. This separation is further reinforced through the use of a new native hedgerow on the outside of the proposed fence line.</p> <p>The de facto route of the PROW is proposed to be maintained as a permissive path in its current position, alongside the array between the fenceline and proposed hedgerow (on its east) and the proposed new native woodland (on its west), maintaining the existing walked route across these fields with built development only existing on one side of this route. The array fenceline will be no closer than 15 m from the permissive route centreline, and CCTV monitoring the Site will be located on this fenceline and directed inward and along the fenceline, not towards users of the permissive route.</p> <p>There is no infrastructure proposed within the southernmost field, DF34 (closest to Mears Ashby).</p> <p><b>ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]</b> has robustly assessed the potential effects to users of this section of PROW, identifying Major / Moderate (Significant) Adverse effects to users of this PROW until mitigation had established at Year</p>



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				<p>15, whereby Adverse effects remain, however these are no longer considered Significant. Similarly, the assessment of TN 003 ('TN3 (south section)') in <b>ES Appendix 17.1: Tourism and Recreation Receptor Tables (Revision A) [REP1-079]</b> assesses no greater than a moderate-minor adverse effect to users of this PRow, which is not significant to tourism or recreation.</p> <p>The proposed width of the PRow and parallel permissive route are to be no less than 2 m, with the permissive route set in a buffer of approximately 10 m between the proposed native hedgerow and woodland planting, allowing for users to easily pass each other. Horse riding would not be permitted on either route in Green Hill D, as the existing PRow is designated as a footpath only.</p>
LC-009	Agriculture	Loss of farmland	Ms Cooper noted that some young people are committed to farming and food production in the UK to support community resilience, yet the land they hope to work on is being taken away for development.	<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 (as described in <b>ES Chapter 20: Agricultural Circumstances [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>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				On decommissioning, the land will be restored and available for arable cropping.
LC-010	Alternatives	Alternatives Community Engagement	<p>Ms Cooper on behalf of her daughter.</p> <p>Comments referred to initial support for renewable energy but expressed concerns after understanding the specific areas affected by the Scheme.</p> <p>Comments referred to the significance of local landmarks such as the 'dog log' a fallen tree that has become a community feature where villagers have engraved the names of their dogs.</p> <p>Comments also referred to questions about why solar panels cannot be installed on existing large rooftops, such as warehouses, rather than replacing open countryside.</p> <p>Comments expressed the view that failing to protect places that protect children's memories then we are failing not only our landscape but the future we are supposed to be planning for.</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 rooftops and the site selection assessment.</p> <p>The location of the local tree stump 'dog log' was not identified in the oral submissions made by Ms Cooper, and the Applicant's team were unable to identify the location of the feature from its own records. The Applicant therefore encourages Ms Cooper or any other stakeholder in the Mears Ashby area to identify where the location of the 'dog log' is, so that the Applicant can determine how it can be protected, avoided, or relocated if required.</p>



## 2.2 Nick Frampton

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NF-001	Cultural Heritage	Heritage and historic character	<p>Mr Frampton noted that the Scheme would cover approximately 1,000 acres of prime agricultural land with solar panels on three sides of the village, along with a battery storage facility.</p> <p>Mr Frampton referred to concerns about the impact on Mears Ashby's character, highlighting that 90% of the village lies within a conservation area, containing 28 listed buildings, two Grade II and 26 Grade II, and a medieval church dating back to the Saxon period.</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 the impact of the Scheme to the Mears Ashby Conservation area and heritage assets within the village.</p> <p>A potential for a moderate adverse effect has been identified as a result of the Scheme to the Mears Ashby Conservation Area as a result of indirect (i.e. setting) impacts.</p> <p>The Scheme design has been established to reduce/remove identified impacts. Solar panels have either been removed (i.e. Fields EF9, EF16 and 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 Areas.</p>
NF-002	Transport and Access	Construction impacts at	Mr. Frampton raised concerns about the suitability of local roads for construction traffic, noting that none	The comment referring to 'HGV rated' it is assumed refers to the weight restrictions on many roads.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
		specific locations	<p>of the five roads leading from the village are rated for HGVs. Comments highlighted that these roads were originally single-lane and widened over time through farm vehicle use and patch repairs, making them vulnerable to damage.</p> <p>Mr Frampton suggested that Highfield Road, at only 4.3m wide, would be one of the worst affected, as standard HGVs (2.6m wide) cannot pass without overriding and destroying verges. Comments noted that the Scheme has designated four access points within half a mile and one cable crossing access. HGVs will frequently meet and pass each other, noting car drivers will feel intimidated and forced off the road.</p> <p>Mr Frampton also referred to concerns about Moonshine Gap and its link to Highfield Road, which is a busy commuter route from Kettering and Burton Latimer, Wellingborough to Earls Barton and the A45, as well as a significant route for parents accessing the village school.</p> <p>Mr Frampton noted that Wilby Road, which runs through Green Hill E, is another commuter cut-through for</p>	<p>Rather than being a restriction that is in place due to the inability for roads to accommodate HGVs, they are in place to restrict movements to access only for environmental purposes and to deter HGV traffic from using routes through villages and to utilise primary roads.</p> <p>The access points for Highfield Road provide for a mix of construction and operational uses, providing flexibility for future construction and access points in the correct location to provide future access for maintenance. This is confirmed in Table 4.1 of the <b>Environmental Statement Appendix 13.2 Transport Assessment Part 1 of 3 [EX3/GH6.3.13.2_A]</b>.</p> <p>The multiple access points will in part allow specific traffic management measures to be put in place along Highfield Road, reducing instances of traffic meeting. Specific measures are proposed for Highfield Road to manage traffic. The opportunity for passing places, a haul route through Green Hill D and multiple access points has been identified to provide flexibility over the construction</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Sywell and school route, where HGVs would pose significant dangers, particularly on bad bends near the proposed cable crossing, an area already known as an accident hotspot.</p> <p>Mr Frampton referred to concerns that temporary traffic lights during construction would cause significant delays and frustration during school pick-up times. Comments noted that such delays could lead to parents taking risks to reach the school on time, increasing the likelihood of accidents.</p>	<p>arrangements. This may vary across the stages of the construction phase. This is defined in paragraphs 6.5.5 and 9.1.6 of the <b>Environmental Statement Appendix 13.2 Transport Assessment Part 1 of 3 [EX3/GH6.3.13.2_A]</b>.</p> <p>An assessment of construction traffic movements on Moonshine Gap was carried out for <b>Environmental Statement Chapter 13 Transport and Access (Revision A) [REP2-003]</b> and no significant effects were identified.</p> <p>The routes that construction HGVs will take have been confirmed and clarified in <b>Transport and Access Routes Supporting Document [REP1-167]</b>. This confirms that HGV movements will not pass on Wilby Road.</p> <p>Whilst the <b>Draft DCO Revision C [EX3/GH3.1_C]</b> allows for appropriate traffic management solutions to facilitate construction, the use of temporary lights has not been confirmed at this stage. Traffic management measures will be agreed with the relevant highway authority post consent.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>The <b>Outline Construction Traffic Management Plan (Revision A) [REP1-145]</b> also includes a commitment towards restricting construction vehicle activity during school pick-up and drop-off times in areas where this is likely to be of specific relevance. The detailed CTMP to be approved post consent will confirm any specific requirements as part of future agreements with the local highway and planning authorities.</p> <p>The link between parents taking risks in reaction to such measures, increasing the likelihood of accidents is not evidenced.</p>
NF-003	Transport and Access	Construction impacts at specific locations	Mr. Frampton raised concerns about the proposed location of construction compound CC1 and access point CR4, adjacent to the shooting range on the A43 between Kettering and Northampton. Noting that this stretch of road is considered one of the most dangerous in the county, with two fatalities this year, five in the past five years, and 78 recorded collisions between Holcot Roundabout and the Walgrave turn.	<p>An assessment of the accident history of the A43 is provided in the <b>Environmental Statement Chapter 13 Transport and Access (Revision A) [REP2-003]</b> which informed the assessment of construction traffic on highway safety. No significant effects were identified.</p> <p>The access drawing for this junction presented in Appendix C of the <b>Environmental Statement Appendix 13.2 Transport</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Mr Frampton suggested that the proposed use of the existing gated entrance, historically used only for cars at weekends, would introduce slow-moving HGVs onto a high-speed road, creating significant safety risks.</p> <p>Mr. Frampton noted the absence of any reference to a safety order and suggested that this location is inherently unsuitable and dangerous for construction access.</p>	<p><b>Assessment Part 1 of 3 [EX3/GH6.3.13.2_A]</b> presents appropriate junction visibility splays and swept path movements.</p> <p>It is envisaged that this junction will operate as a left-in left-out access for construction vehicles. <b>The Outline Construction Traffic Management Plan (Revision A) [REP1-145]</b> identifies that appropriate traffic management can be used at access points in agreement with the highway authority and this will be confirmed as part of the final CTMP.</p>
NF-004	Transport and Access	Construction impacts at specific locations	<p>Mr Frampton raised concerns about the proposed access for BESS C1 via a farm track opposite Beckworth Emporium, creating a new crossroads at the junction of Sywell Road and Glebe Road.</p> <p>Mr Frampton noted that Beckworth Emporium, a large retail and food outlet owned by the Blue Diamond Group, attracts over 1,000 visitors per day, with car park counts exceeding 400 vehicles on individual days in September and October.</p> <p>The introduction of construction traffic and a substation with 92 battery containers within 300m of</p>	<p>Please refer to the Applicant's response to 'MAPC-009' in the <b>Applicant's Response to Relevant Representations [REP1-161]</b> in respect of impacts on Beckworth Emporium as a tourism receptor and the economic impacts of delay to vehicular uses.</p> <p>The access to Green Hill C which may accommodate a BESS is an existing access, put in place to facilitate the construction of the existing Solar Farm to the north of Green Hill C.</p> <p>The access drawing for this junction presented in Appendix C of the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Beckworth Emporium would significantly increase congestion and safety risks at an already busy junction with limited visibility.</p> <p>Mr. Frampton noted that while four-way traffic lights could manage flows to some extent, delays would be substantial, with queuing around bad bends near Sywell Airport which will be dangerous.</p> <p>Mr. Frampton also suggested that visitor numbers to Beckworth may decline and that traffic diversions through Mears Ashby could increase congestion and safety risks, particularly during school pick-up times.</p>	<p><b>Environmental Statement Appendix 13.2 Transport Assessment Part 1 of 3 [EX3/GH6.3.13.2_A]</b> presents junction viability splays that are in accordance with recorded vehicle speeds.</p> <p>Whilst the <b>Draft DCO Revision C [EX3/GH3.1_C]</b> allows for appropriate traffic management solutions to facilitate construction, there are currently no plans to implement temporary four-way traffic lights at the junction of Sywell Road and Glebe Road.</p>
NF-005	Hydrology and Flood Risk	Contamination of water	<p>Mr. Frampton raised concerns about the proposed battery storage facility at BESS Green Hill C, located less than 300m from Beckworth Emporium. Comments noted that battery storage systems are considered inherently unsafe, with fires becoming increasingly common, and stated that placing such a facility so close to a major retail outlet is unprecedented.</p> <p>Mr Frampton referred to concerns about the absence of any detailed</p>	<p>The Applicant strongly emphasises that BESS are not inherently unsafe, 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</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>safety assessment and highlighted that a fire at BESS C, combined with a north wind, could have catastrophic consequences for Beckworth Emporium.</p> <p>Mr Frampton also noted that just 30m downslope from the corner of BESS C lies a stream called Sywell Bottoms, which feeds directly into Sywell Reservoir.</p> <p>Mr. Frampton raised concerns that contaminated water runoff following a fire could enter this stream, causing an ecological disaster for Sywell Country Park, which is home to important wildlife habitats, the county's top tench fishery, and a popular open-water swimming venue.</p>	<p>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, 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>Outline Battery Storage Safety Management Plan [REP1-143]</b> (OBSSMP) 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>The Applicant commissioned a Plume Study: <b>BESS Fire emissions</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p><b>modelling report [APP-167]</b> to assess fire emission impacts on all sensitive receptors within a 1km radius of both BESS areas (Green Hill BESS and Green Hill C).</p> <p>Beckworth Emporium is located 496 metres from the BESS area; the plume study modelling (page 12) demonstrates that in a worst-case climate condition a single BESS enclosure fire emissions are at safe levels at this location i.e. all emissions are below 1PPM.</p> <p>As stipulated in Section 5.5.9 of the <b>Outline Battery Safety Management Plan Rrevision A (OBSSMP) [APP-551]</b>:</p> <p><i>“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</i></p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p><i>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."</i></p> <p>All data provided by the BESS system provider is validated by accredited third party test laboratories and specialist BESS independent fire protection engineers.</p> <p>Section 5.5.8 of the OBSSMP documents:</p> <p>The Plume Study contained Chapter 16: Air Quality [APP-053] 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</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out).</p> <p>Section 2.4.2 of the OBSMP specifies that:</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. 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 Northamptonshire Fire and Rescue Service (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</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>significantly impact site operatives, first responders, and the local community; and</p> <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>At the detailed design stage 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</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>demonstrate that the risk to site operatives, first responders, and the local population remains very low.</p> <p>Section 5.5 of the OBSMP sets out the firefighting consequences and mitigation solutions for a BESS fire incident to ensure there are no water pollution risks for the Scheme.</p> <p>Section 6 of the OBSMP stipulates:</p> <p><i>“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.”</i></p> <p>Northamptonshire Fire &amp; Rescue Service (NFRS) and the Environment Agency are statutory consultees for the Scheme, the Applicant must satisfy both parties that there are no water pollution risks posed by a BESS failure incident.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Section 7 of the OBSMP confirms that:</p> <p><i>“The implementation of the OBSSMP is secured through a Requirement in Schedule 2 of the DCO. This will stipulate that a detailed Battery Safety Management Plan will be submitted to and approved in consultation with NFRS, the Environment Agency (EA), and by the relevant planning authorities prior to the commencement of the works for the BESS. This plan will be substantially in accordance with the OBSSMP.”</i></p> <p>The drainage for the BESS at Green Hill C will be designed to the same standards as the BESS at Green Hill BESS, to ensure no contaminated water enters the wider environment. The drainage strategy for the BESS area at Green Hill C is set out in the Flood Risk and Drainage Strategy Annex E [REP1-055]. Please also refer to the Applicant's comments in relation to drainage at the BESS areas summarised in the Written Summary of the Applicants Oral Submissions at the Issue Specific Hearing 1 and Responses to Action Points <b>[REP1-162]</b> and Written</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 and Responses to Action Points <b>[EX3/GH8.1.20]</b> .
NF-006	Cultural Heritage	Military air crash sites	<p>Mr. Frampton raised concerns about the presence of a World War II crash site known as Mission 48, where two B-17 bombers from the 303rd Bomb Group collided mid-air on 31 March 1943 and crashed in fields east of Mears Ashby, resulting in the deaths of 15 crew members. Mr. Frampton noted that each aircraft carried six 1,000-pound bombs and that the crash site is recorded on the Northamptonshire Historic Environment Record (HER) as No. 1995-0-8. Mr. Frampton highlighted the existence of memorial plaques at Dutchess End and Sywell Airfield Museum and stressed that the location of the crash sites and scattered ordnance is documented by local historian, of which their documented records are available.</p> <p>Mr Frampton noted that all military crash sites are protected under the Protection of Military Remains Act, making it an offense to disturb or</p>	<p>No development is proposed within Fields EF9 and EF26 where WW2 crash sites are recorded within Green Hill E. Where archaeological evaluation has been undertaken in surrounding fields, no remains associated with the crash were encountered. The Applicant is confident that there is no potential for impacts to these military crash sites.</p> <p>The Applicant is also confident that there is no potential for impacts to any military crash site relating to the Wellington LN536 as a result of the Scheme, and notes that it is extremely unlikely that the De Havilland Vampire XD390 crash site is located within Site G.</p> <p>The Applicant has contacted the Joint Casualty and Compassionate Centre (JCCC), the body responsible for licencing under the Protection of Military Remains Act 1986, to confirm this position and clarify whether a licence would be required for the proposals.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>remove items without a Ministry of Defence license.</p> <p>Mr. Frampton requested that, should the project proceed, infrastructure be located at a safe distance from the entire crash site and that solar panels be excluded from fields EF13, EF14, EF10, EF22, EF24, and EF21.</p>	
NF-007	Landscape and Visual Impact	Suitable Alternative Natural Greenspace (SANG)	<p>Mr. Frampton referred to Mears Ashby Parish Council's response to the GHS impact statement, noting that the Council seek a piece of land to be set aside as a SANG (Suitable Alternative Natural Greenspace) close to the village, providing safe and accessible walking routes for residents. Comments referred to the Council's proposal that the fields identified for development be removed from the project and declared as a SANG.</p>	<p>A Suitable alternative natural greenspace (SANG) provides an alternative greenspace to attract residents of new residential developments away from protected and vulnerable sites including Special Protection Areas (SPA) or Special Aereas of Conservation (SAC). As such, given the nature of this development, there is no requirement for this DCO to deliver a SANG.</p>



## 2.3 Kay Brown

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KB-002	Consent Order	Supply chain	<p>Ms. Brown raised concerns that the Scheme would have a significant environmental impact across all phases (from operation to decommissioning) and permanently damage the rural environment.</p> <p>Ms. Brown noted that, according to Solar Energy UK's March 2025 briefing, the solar supply chain is complex, involving companies who design, manufacture, transport, and install solar systems, including panels, mounting systems, cables, batteries, and other equipment. Comments highlighted that it includes businesses which mine raw materials using coal fire stations such as metal and quartz used for solar panels and that many companies involved in these stages are based in China.</p> <p>Ms. Brown referred to an amendment to the Great British Energy Bill (April 2025) requiring all applicants to include an ethical and comprehensive supply chain plan.</p> <p>Ms. Brown expressed concern that the applicant's submission (APP-552) contains only a single paragraph stating adherence to UK Solar Energy</p>	<p>The assessments set out within the Environmental Statement <b>[APP-038 to APP-064]</b> have been undertaken to identify the likely effects of the Scheme during its construction, operation, and decommissioning phases. Where significant effects have been determined to be likely, the Scheme includes mitigation measures to reduce adverse effects and disruption. The measures are secured through the relevant mitigation and management plans secured by Requirements in Schedule 2 to the <b>Draft DCO Revision C [EX3/GH3.1_C]</b>.</p> <p>Please refer to the Applicants response to matter <b>SOC-011</b> and <b>OEM-003</b> in the <b>Applicant's Response to Relevant Representations [REP1-161]</b> for details on the supply chain and lifecycle of materials.</p> <p>The Applicant can confirm that Island Green Power, the parent company of the Applicant, is a signatory of the Solar Energy UK supply chain statement, and a member of the international Solar Stewardship Initiative, which both commit the company to a transparent, sustainable supply chain free of human</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Standards, and urged that a detailed plan be provided as part of the DCO.</p> <p>Ms. Brown requested clarification on who would be responsible for due diligence across the entire supply chain, from initial production through to end-of-life management.</p>	<p>rights abuses when sourcing the panels. Paragraph 5.4.7 of the <b>Outline Skills Supply Chain and Economic Plan [APP-552]</b> states that “<i>All international suppliers will be held to a minimum quality with regard to professional and ethical working practices as agreed by the members of Solar Energy UK.</i>” The Applicant confirms that a detailed Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to the <b>Draft DCO Revision C [EX3/GH3.1_C]</b>. Failure to comply with any Requirement is a criminal offence.</p>
KB-003	Climate Change	Carbon Footprint	<p>Ms. Brown raised concerns about the carbon footprint of solar panel manufacturing, noting that the extraction process requires significant water resources, contributing to depletion in producing countries.</p> <p>Ms. Brown highlighted that processing materials such as polysilicon, glass, and metals to produce one square metre of PV modules needs huge amounts of energy and emits between 32 to 72 kg of CO<sub>2</sub> kilowatt per hour [sic]. It was also noted that transportation, installation, maintenance, and decommissioning is on top of this and there is no current measurement of the</p>	<p>The figure of 32 to 72kg of CO2 kilowatt per hour appears to contain a unit error. The Applicant's climate change consultant has estimated the carbon emissions to be between 43.90-47.44 gCO<sub>2</sub>e/kWh. The gCO<sub>2</sub>e/kWh metric is specifically designed to measure greenhouse gas emissions throughout the lifecycle of the scheme, including:</p> <ul style="list-style-type: none"> <li>• Raw material extraction and processing</li> <li>• Manufacturing energy</li> <li>• Transportation</li> <li>• Installation</li> </ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			environmental impact of this, according to Inferlink consulting February 25.	<ul style="list-style-type: none"><li>• Operation and maintenance</li><li>• End-of-life disposal/decommissioning</li></ul> Full lifecycle measurements have been taken into consideration within the report and the net climate benefit is substantial when operational savings are considered within <b>ES Chapter 7: Climate Change [APP-044]</b> .
KB-004	Alternatives and Design Evolution	Alternative locations	<p>Ms. Brown questioned the need to locate the development on Best and Most Versatile agricultural land.</p> <p>Ms. Brown cited the schemes Agricultural Circumstances Report, which states that 66.6% of the land is classified as ALC Grades 1 to 3a. Comments noted that this is contrary to government guidance, which advises that BMV land should only be used in strong mitigator circumstances, and expressed the view that such circumstances have not been demonstrated.</p> <p>Ms. Brown urged the examination process to review the pipeline and reconsider the need for solar development on high-grade land.</p> <p>Ms. Brown also highlighted that rooftop solar installations are increasing across</p>	Please refer to <b>SBMP-001</b> for details on site selection and use of agricultural land, <b>ScPC-002</b> for details on use of rooftops in the <b>Applicant's Response to Relevant Representations [REP1-161]</b> .



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			all three council areas and that the region, located at the center of the UK, is a hub for large warehouse developments. Examples cited included commercial builds in Northampton adopting BREEAM standards, such as Marks & Spencer, Greggs, the new rail freight depot, and Prologis, as well as widespread installation of solar panels on new housing developments in the area.	
KB-005	Energy Need and Policy	Grid capacity	<p>Ms. Brown raised concerns about the scale of renewable energy projects in the UK pipeline, questioning why a queue of over 700 GW exists when current capacity is around 20 GW and national needs are estimated at 70–80 GW.</p> <p>Ms. Brown noted that while NESO announced on 8 December that some projects have been rejected and the queue reduced to approximately 200 GW, this still exceeds requirements.</p> <p>Ms. Brown urged the Planning Inspectorate to assess projects to ensure projects are in the least impactful locations, avoiding harm to food security and rural environments.</p> <p>Ms. Brown also questioned the applicant's position within the NESO list,</p>	<p>The Applicant does not agree with some of the numbers stated in this submission. The Statement of Need <b>[APP-556]</b> sets out at Section 3.7 the basis of the Government's Connections Action Plan. This plan is the basis of the work recently undertaken by NESO to review the connection queue and re-prioritise connection offers for schemes which are (a) ready, and (b) strategically aligned with the current capacity ranges established in the Clean Power 2030 Action Plan (see Section 3.9 of the Statement of Need).</p> <p>Figure 8 of the Statement of Need shows that low carbon generation capacity in GB is currently circa 64GW and the NESO's net zero consistent future energy pathway shown is for circa 200GW of generation in the early 2030s</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			noting that the Scheme does not appear on the register for Gate Two and requested clarification on whether they are at Gate One or elsewhere in the process.	<p>rising to circa 300GW in the early 2040s and nearly 350GW by 2050. Chapters 4 and 5 of the Statement of Need provide evidence to support the the urgent and unprecedented increase in low-carbon generation capacity required to reach net zero.</p> <p>NESO's 8<sup>th</sup> December announcement was the first in a new and enduring queue formation process. Government has stated that "whilst the 'Clean Power Capacity Range' provides a foundation to guide rapid policy development and focus delivery, the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained... until more clarity on which scenario is most likely is available" (Clean Power 2030 Action Plan, p31).</p> <p>It is therefore possible that the capacity ranges for different technologies will change as some are more successful at the swift delivery required of the Government's plans to fight climate change.</p> <p>The process of administering the legal contracts between NESO and developers to confirm acceptance of new connection offers will be lengthy and it will only be when an agreement to</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>vary an existing connection agreement is signed that the characteristics of that connection agreement will be published on the TEC Register (NESO's 'list').</p> <p>National Policy Statement for Energy EN-1, paragraphs 3.2.6 to 3.2.8, confirms that the Secretary of State should assess all applications for renewable energy generation projects on the basis that there is a need for those types of infrastructure which is urgent, and the Secretary fo State is not required to consider separately the specific contribution of any individual project to satisfying that need.</p>
KB-006	General	Scheme funding	<p>Ms. Brown raised concerns about the economic viability and funding of the proposed scheme, highlighting the concern of foreign investment being driven by profit and corporate interests.</p> <p>Ms. Brown referred to the Funding Statement (APP-020, May 2025), which estimates costs up to £1 billion; although comments raise concern that this is underestimated.</p> <p>Ms. Brown expressed concern that this approach lacks transparency and due diligence, noting that many NSIPs historically run over budget, with HS2 cited as an example of overspend</p>	<p>See response above re: the Scheme's position in the reordered connections queue.</p> <p>The Statement of Need <b>[APP-556]</b> sets out the economic case for large scale solar in Chapter 10 that "Large-scale solar power decarbonises the electricity system and lowers the market price of electricity by generating power so that expensive and more carbon intensive forms of generation do not need to generate as much.</p> <p>Due to technological advances, solar facilities are already among the cheapest form of electricity generation</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>reaching £50 billion. Concerns were raised that the applicant does not have a credible plan to fund this, saying they have experience in raising funds for this kind of project, however, do not propose to do this until a decision is made on the DCO.</p> <p>Ms. Brown compared the applicant's submission to applications such as Cleve Hill and Sunnica, questioning why minimum standards for financial disclosure are not enforced.</p> <p>Ms. Brown asked the Planning Inspectorate to review the applicant's due diligence and their ability to fund the project over a 60-year term; requesting guarantees through bonds or other mechanisms and clarity on how funding would be managed if the project is sold.</p> <p>Ms. Brown noted that incentives such as Contracts for Difference and Purchase Power Agreements attract developers to the UK, but profits often leave the country without reinvestment.</p> <p>Ms. Brown referenced Spain, where solar tax incentives led to rapid growth but after incentives dropped this resulted in bankruptcies and abandoned projects, with successful projects facing curtailment as the grid did not keep up</p>	<p>in the UK and government produced forecasts indicate that costs will continue to reduce in the future.”</p> <p>Please refer to <b>GEN-004</b> for details on funding in the <b>Applicant's Response to Relevant Representations [REP1-161]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>with capacity; raising questions about UK grid capacity and resilience under changing policies.</p> <p>Ms. Brown urged the Planning Inspectorate to take a nationwide view of cumulative solar development, assess alignment with NESO's distribution and transmission plans, and ensure projects are located in the most appropriate areas.</p>	
KB-007	Socio Economics, Tourism and Recreation	Property impact Community benefit	<p>Ms. Brown raised concerns about the potential loss of residential property value. Reference was made to analysis submitted in the Botley West Farm NSIP by Dr David Rogers, which modelled reductions of 2–16% depending on proximity to solar panels. Comments noted that, when applied across all affected homes, this represents a significant cumulative loss.</p> <p>Ms. Brown also highlighted that compensation for house values and a contribution to the energy cost commonly used in the United States; noting this has been refused by the Applicant during early stakeholder engagement and it has instead offered the community fund.</p> <p>Ms. Brown requested that the Inspectorate require a mandatory, fully</p>	<p>Impacts on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the <b>ES Appendix 2.2: EIA Scoping Opinion [REP1-035]</b>. This is because there is no empirical evidence that large solar farms cause significant long-term adverse effects on property prices. Whilst it is acknowledged that the majority of &gt;50MW solar Schemes in the UK are not yet operational, studies from the USA and Netherlands do not show any definitive evidence of adverse effects between solar farms and property prices, and conclude that other external factors (such as wider property markets, macroeconomic trends, changes to local services such as schools and healthcare providers) are likely to be more important factors in</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>engaged session with relevant parties to ensure that the proposed community fund is clearly defined and formally secured before any DCO is accepted. Comments noted that similar requirements were insisted upon by Michael Shanks for the Tillbridge project as part of its acceptance.</p>	<p>changes to property prices. Furthermore, there is a difference between short-term troughs in property saleability during peaks in construction activity versus the long-term property value once the Scheme is operating and mitigation set in place.</p> <p>The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations. The Community Benefit Fund cannot be taken into consideration by the Examining Authority or the Secretary of State when considering the DCO Application. Whilst there is consultation being carried out on proposals to make the Community Benefit Fund mandatory, this is not yet the case, and the Fund continues to be wholly separate from the DCO and planning process.</p> <p>Community benefits are not covered by either the Secretary of State's decision letter or the consented DCO for Tillbridge Solar, although there is a requirement for a Community Liaison</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Group. The Applicant's draft DCO contains a similar provision (Requirement 4 in Schedule 2 of the draft DCO), as the Applicant is committed to ongoing engagement with the community.

## 2.4 Dawn Partridge

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DP-001	Ecology and Biodiversity	Impact to small copse wood	<p>Ms Partridge noted that the plans include a wide buffer zone around the cable route; expressing concern that, although the current path passes through an agreed section of their land, the width of the buffer zone could allow the route to shift toward the boundary.</p> <p>Ms Partridge highlighted that any deviation toward the edge of the buffer zone could result in the corridor cutting through a small copse of woodland on the property.</p> <p>Ms Partridge raised concern that the Applicant might classify the trees as low-value because they were planted in the 1980s, despite the woodland forming an important habitat for local wildlife.</p>	<p><b>Chapter 19: Arboriculture [APP-056]</b> has assessed the potential impact of the Scheme on trees and woodland. The reference for this area is W0085.</p> <p>W0085 would be retained and protected, it is shown as moderate quality in <b>Tree Impact Plan Green Hill E and Cable Route Corridor Sheet 1 [APP-513]</b>.</p> <p>Embedded Construction Mitigation Measures are listed in section 3.2 of <b>ES Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-171]</b> which includes tree roots and canopies.</p> <p>It is proposed to use a trenchless method to install the cable, such as Horizontal Direction Drilling (HDD), at crossing reference HV_SP8566_001 in</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p><b>Crossing Schedule [EX3/GH7.18_A]</b> which could help avoid the removal of trees along the watercourse to the north.</p> <p>The cable will be micrositied during the detailed design stage so the full 50 metre typical width of the cable route corridor may not be required.</p> <p>The Applicant will seek to arrange a discussion between the Applicant's ecologist and Ms Partridge.</p>



## 2.5 Victoria Jane Smith

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
VJS-001	General	General concerns regarding the Scheme	<p>Ms Smith expressed full support for the representations made by other interested parties at the open floor hearing, noting that their points were accurate and comprehensive; stating that they fully endorsed the issues already raised.</p> <p>Ms Smith noted that the speaker is the Chair of Mears Ashby Parish Council and had become involved in the process due to this role.</p>	<p>The Applicant notes this comment. Ms Smith attended Open Floor Hearing 2 on 12 December, providing further comments. Please refer to the Applicant Response to Ms Smith in the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Responses <b>[EX3/GH8.1.24]</b>.</p>



Ref.1 James, D. (2022) How solar panel diversification is working for a sheep enterprise. Farmers Weekly. Available at: [REDACTED]