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17<sup>th</sup> December 2025

**PINS ref: EN010170**

**Application by Green Hill Solar Farm Ltd. for an Order granting Development Consent for a proposed solar development on land between Northampton and Wellingborough**

**CPRE Northamptonshire  
Feedback on Applicant's Responses to Written Representations  
Deadline 3, 17<sup>th</sup> December 2025**

**Introduction**

This document contains the CPRE Northamptonshire's reactions to the responses submitted by the Applicant in response to our written representation within their document

**REP2.048 GH8.1.13\_Applicant Responses to Written Representations.**

The timeframe for Deadline 3 has been particularly challenging because of the predictable level of other commitments associated with the Christmas period and so we reserve the right to revisit our responses at a later date.

The table below shows columns:

- the Applicant's reference from **REP2-048**,
- their response and
- our feedback on that response.

This means that in order to see our original comments it is necessary to correlate this document with **REP2-048**. The only exception is CPRE-023 which was duplicated in **REP2-048** which has been relabelled as CPRE-023.1 and CPRE-023.2.



Reference	Applicant response	Feedback
CPRE-002	<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.</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 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 in <b>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.</p>	<p>We remain of the opinion that the LVIA is cursory when compared to other applications to which we have responded and dismissive of the visual impacts of the scheme. This is partially because it focuses its assessment on landscape fabric over visual impact. It places undue reliance on the effectiveness of screening to fully mask the elements of the scheme and does not account for the undulating landscape. The methodologies used are not comparable to other schemes and generally under-rate adverse impacts. We even questioned among ourselves whether the Applicant was serious about pursuing the scheme as the LVIA felt incomplete and possibly half-hearted.</p> <p>As is the case throughout the application, we consider that the Applicant does not assess credible levels of impact. The villages surrounded by the elements of the scheme will cease to be desirable villages set in rural locations but villages set amongst solar farm infrastructure. For those that remain in the villages there would be a continuing sense of loss of what they valued about their location. For new residents there would not be the uplift that derives from living in an attractive rural location.</p>



CPRE-003	<p>The Scheme consists of a number of Sites which together are the Scheme. Although the Scheme comprises a series of independent areas of Sites, they are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and 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 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>	<p>When CPRE Northants has previously argued that there should be a cumulative visual impact assessment of the separate sites because they would be perceived as separate schemes, the Applicant responded that this was not necessary because it is a single scheme. In this response they are now arguing that the sites are sufficiently separated to be viewed as individual unconnected schemes. Either the Applicant must acknowledge that the whole scheme impacts on the whole scheme area creating a new solar infrastructure landscape type, or they must carry out a cumulative impact assessment of the individual sites. They cannot have it both ways.</p> <p>We agree that the unusually large land take of the scheme allows it to be set back from settlement edges. We do not agree that infrastructure of such a large size and scale can be assimilated into the landscape.</p> <p>We maintain the opinion that the scheme is wasteful in its land take and that scattering its components across the landscape it creates greater harm than if it was concentrated into one area.</p> <p>Please refer to our response in CPRE-005 below</p>
CPRE-004	<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</p>	<p>It is difficult to know whether the Applicant is deliberately misconstruing this point. The point is that good spatial planning does not liberally scatter undesirable development across the plan area, but brings it together in order to limit the overall area adversely affected. This scheme proposes to scatter solar infrastructure across the landscape which inevitably adversely</p>



<p>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> <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 the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to</p>	<p>impacts a greater area than would be the case for a concentrated scheme such as the Tillbridge scheme.</p> <p>When the existing Local Plans were created, they could never have anticipated that schemes of the size and scale of that proposed would come forward and so it is unsurprising that no sites were allocated. The expectation was that smaller schemes would come forward that could be accommodated within the landscape.</p> <p>Please refer to our response in CPRE-003 above.</p> <p>We profoundly disagree with these arguments and consider that the sites are not, as is suggested, sufficiently separated for remembered views of one site to be forgotten before encountering views of the next site. The scattering of the scheme across the landscape merely creates a wider landscape and more settlements that are dominated by solar infrastructure.</p> <p>We agree that the wasteful level of land take does create greater opportunity to plant screening but question whether this is a good use of agricultural and BMV land. We cannot understand how the Applicant suggests that the design reduces the impact on the use of BMV land given that the BMV land take is greater than comparable schemes.</p> <p>We do not consider the LVIA to be robust as we have explained above.</p>
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	<p>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> <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>	
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	<p>This includes an assessment of both Combined views and Sequential views.</p> <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 [APP-045], 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) [APP-041].</p>	
CPRE-005	<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>The arguments in SBMP-005 of REP-161 regarding mitigating climate change only address the impacts of climate change upon the scheme and not on the national threats resulting from climate change. The scheme may be robust to climate change but the threats identified by the Climate Change Committee and others are not addressed.</p> <p>Although we do not disagree that there is an urgent need to cut global emissions if global climate change is to be addressed, this can only hold back the impacts of climate change if there are global efforts to reduce emissions. Unfortunately, this is not happening and in fact last year global emissions increased at the fastest rate on record with China alone increasing their emissions by nearly double the total amount of UK emissions. This makes it more important than ever for the UK to prioritise adaptation and mitigation instead of pretending that we can prevent global climate change. "When a boat is taking on water than faster than you can bail it out, you find your lifejacket and</p>



	<p>In relation to Para 2, the Applicant refers to the <b>Statement of Need [APP-556]</b> which 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>. 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>prepare the lifeboats, you don't just keep bailing until you sink unprepared."</p> <p>The renewables industry are masters of selective statistics and have chosen figures for the only renewable technology more land-hungry than solar: growing crops for energy. However, the comparison with wind is grossly misleading because whereas solar takes the whole land area out of its current use, wind turbines are widely spread (to prevent the wake from one turbine reducing the energy reaching another) which allows the vast majority of the land area to continue in its current use. We estimate that solar is about 750 times more land-hungry per MWh than wind.</p> <p>It is true that the government see wind and solar as the main sources of renewables. However, they are both intermittent technologies and require support within the grid if we are not going to experience blackouts. For this reason, there are specific targets for the different technologies and solar targets are not looking under threat. Furthermore, there is ever-growing installation of solar within the built environment which reduces the need for agricultural land, particularly BMV, to be taken out of production for ground mounted schemes. Wind, particularly high capacity factor offshore wind, has to be the backbone of renewable generation because of its ability to deliver electricity in a way that more closely matches the needs of the grid.</p> <p>Solar, with its seasonal levels of generation being the inverse of seasonal demand, is the weakest contributor to a secure and reliable grid. The proposed battery backup does not make it a reliable form of supply because the stored capacity from the</p>
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	<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>	<p>scheme could not deliver its 500MW output overnight even in peak summer generation periods.</p> <p>Solar is definitely a part of the mix for a net zero grid. However, it can only play a minor role because of the limitations identified above. It is best deployed within the built environment where the UCL study that CPRE commissioned shows targets could be met without sacrificing valuable agricultural land.</p> <p>All the Applicant's arguments do not address the core concern: that it is impossible to reliably predict how climate change will progress and how national priorities will change over the next 10 years, let alone the next 60. Committing a valuable and flexible land resource for such a long period would be irresponsible and certainly not in the national interest. If ground mounted solar is still considered desirable at the time of repowering, then permission could readily be extended. It should be remembered that schemes have progressed with just a 25-year permission so a 60-year permission should not be necessary. The fact that other schemes (some of which were recommended for refusal) have been granted long permissions is no reason to do the same.</p>
CPRE-006	<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</p>	<p>The scheme would reduce emissions from electricity generation but in a global context the saving would be insignificant. Furthermore, there are already more solar schemes in the</p>





	<p>(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 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.</p>	<p>planning system and because of the limited capacity to accommodate solar into the grid, there are other less harmful schemes that could deliver the same savings.</p> <p>As previously explained, because of its limitations there is a limited capacity for the grid to absorb solar schemes and so this scheme is one of many that could combine to meet the target.</p> <p>Storage certainly mitigates the intermittency of schemes but it does not necessarily have to be co-located with solar schemes to do so.</p>
CPRE-007	<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>As stated elsewhere the weaknesses of solar mean that it can only play a small part in the grid. The current rate of deployment is currently delivering significant capacity and it is unwise to indiscriminately approve schemes based second-guesses.</p> <p>Wind farm developers made similar arguments about urgency yet targets were reached many years in advance.</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> <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>	
CPRE-008	<p>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.</p>	Our comment was only introductory
CPRE-009	<p>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".</p> <p>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</p>	<p>These comments do not challenge the figures presented by CPRE. On the contrary, they lend additional weight to the importance of considering the “decarbonised” figures because they account for the transition from fossil fuels to electricity.</p> <p>The important take-away from the CPRE figures is that the <b>Decarbonised total energy footprint</b> total of 6,900 homes is remarkably close to the number of homes in the villages that would be so badly impacted by the scheme. As noted in CPRE-005 solar is a very land-hungry source of energy.</p>



	<p>asset type than that provided by scenarios which do not include solar generation.</p> <p>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.</p>	
CPRE-010	<p>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.</p>	<p>We acknowledge that BESS play a useful role in balancing the grid. but highlight that the BESS cannot bridge the periods during which solar cannot be generating.</p>
CPRE-011	<p>The Scheme ensures that biodiversity losses within the Order Limits have been fully mitigated and compensated for, and 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. 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>	<p>In other words, the Applicant acknowledges that they have not considered that the scheme will displace food production and that it is likely to cause biodiversity loss where alternative land is brought into use.</p> <p>By coincidence the amount of energy generated that would be generated by the scheme would equate to approximately 0.027% of the current UK energy consumption. If the food loss is to be considered as not significant in a national context, then so too must the contribution to energy generation from the scheme. However, only 20% of agricultural land is classified as BMV the loss of BMV would be more like 0.036%.</p>



CPRE-012	<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 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>	<p>We do not disagree that the greatest risk to food security is climate change and that it is vital that the UK works with partners around the world to reduce global emissions. However, the woeful lack of global action means that food security is at increasing risk in the UK making it more important than ever to improve our poor food security.</p> <p>By coincidence the amount of energy generated that would be generated by the scheme would equate to approximately 0.027% of the current UK energy consumption. If the food loss is to be considered as not significant in a national context, then so too must the contribution to energy generation from the scheme. However, only 20% of agricultural land is classified as BMV the loss of BMV would be more like 0.036%.</p>
CPRE-013	<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</p>	<p>We note the figures but also note that the number of "not significant" impacts nationally mount up just as the amount of small amounts of renewable generation have mounted up.</p> <p>By their very nature, recreational routes are chosen because of the enjoyment derived from using them. The routes may well not be extinguished by the scheme, but the attractiveness of using them would be substantially diminished making it likely that they would largely cease to be used.</p>



	<p>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 <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.</p>	<p>During construction, replacement and decommissioning there are likely to be periods of disruption and interruption in their availability.</p>
CPRE-014	<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>	<p>The government’s “Land Use Consultation” was roundly criticised for its lack of rigour and thankfully seems to have disappeared without trace. The expectation expressed that improvements in agricultural productivity would offset land loss was particularly challenged because productivity is reducing because of environmental measures such as the use of fewer inputs such as fertilizer and crop sprays and the impacts of climate change. Last year the UK had the worst harvest for many years which should be taken as a warning that should be heeded.</p> <p>If the replacement cereal is to be grown in the UK it is inevitable that additional land will have to be converted to intensive agriculture.</p>
CPRE-015	<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> <p>An indexed copy of the detailed LVIA assessment has been provided at Deadline 1 <b>[REP1-041]</b>.</p>	<p>This does not address the omission of some of our PEIR comments from APP-035.</p> <p>This was too little too late and does not explain the unnecessary complexity of the presentation of the application.</p>



	An 'LVIA Orientation' presentation was held on the 13th November 2025 to aid Interested parties' navigation of the LVIA and associated Appendices.	It would have been useful to have received an invitation to the orientation of for a recording to have been made available.
CPRE-016	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.	The Applicant has not addressed the disparity between their methodologies and those used for the Tillbridge scheme. We are not alone in considering that the Applicant's LVIA consistently understates the level of impacts to favour the scheme.
CPRE-017	<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.</p> <p>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.</p> <p>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>	We are aware of the process and also aware that officers seldom have the time to verify all the viewpoint locations and accept ones proposed with a credible rationale, particularly dual-purpose viewpoints.



	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	<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 <b>[APP-308]</b>.</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> <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>If Winter Year 1 and Summer Year 15 representations are industry standard then they do not show the mature screening worst case. Under the Rochdale envelope the Year 1 winter photomontage must therefore be used to assess the Year 15 winter impact. Since the LVIA assumes that by Year 15 the screening completely conceals the development this cannot be the case.</p> <p>The majority of the remaining photographs do not give sufficient information to be able to identify the location and extent of the panels.</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 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. Visualisations have been produced in accordance with the Landscape Institute TGN 06/19 and the developing understanding of visualisation work. The resultant visualisations are highly accurate. For the Green Hill Solar Project, MSEnvision (MSE) constructed a full 3D model of the Scheme using the layout data supplied by Lanpro, OS MasterMap for geo-referencing and Environment Agency LIDAR DTM (2m). 3D point data was used for checking horizontal and vertical alignment. Images of the 3D model utilised within the visualisations can be see within the Photography and Photomontage Methodology is included within Appendix 8.1 <b>[APP-078 and APP-079]</b> on pages 4 to 9.</p>	<p>The worst case depends upon the direction from which panels are viewed. Presenting the panels as modelled shows the maximum height, but presenting the panels face on does not.</p>
CPRE-019	<p>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 operation at year 15 (summer) and at decommissioning stage (winter). 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 places undue weight on the landscape fabric and the mature scheme giving the impression that the initial 15 year period is not significant and that thereafter the planting solves all issues.</p> <p>It acknowledges change to the landscape character but we consider that throughout the LVIA the adverse impact is understated.</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 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> <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</p>	
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	<p>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	<p>The <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> includes a through 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> <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>	<p>As previously stated we do not consider the Cumulative Sequential Visual Impact Assessment is either thorough or robust.</p> <p>The GLVIA 3 Table7.1 does not state that <b>ONLY</b> major roads and popular paths should be assessed but cites these as examples of regularly used routes.</p> <p>Many local roads are also regularly used both for village residents to access work or facilities and also as alternative routes used to avoid traffic. The only way that these roads cannot be considered to need assessment is if the Applicant considers that the whole of the landscape covered by the scheme as being wholly within solar farm infrastructure.</p>
CPRE-021	<p>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</p>	<p>Best practice requires that micro-siting should be used to avoid foreground clutter.</p>



	<p>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and 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	<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 when undertaking on site analysis and assessment of a development.</p>	<p>These would have saved a lot of work when preparing the written representation but so late in the process they are too late to be of benefit to us.</p> <p>Bare earth ZTVs do over-represent visibility but augmented ZTVs are notorious for under-representing visibility because they assume that all features of a certain type are impenetrable and of a certain height across their mapping footprint. If views are predicted on an augmented ZTV they are extremely likely to exist.</p>
CPRE-023.1	<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>	<p>We maintain that the study areas are unduly restricted in particularly where it applies to cumulative sequential visual impacts. The size of the study areas is less than the sizes used in other applications</p>



CPRE-023.2	<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> 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>	<p>See CPRE-020 above.</p> <p>The assessment does not adequately assess the even the A roads and does not assess local roads that are regularly used routes.</p>
CPRE-024	<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 the landscape context against which the Green Hill Scheme has been assessed.</p>	<p>The ES does not adequately assess the regularly used route along the A509 between Olney and Wellingborough but only a very limited section of the route. It omits the two solar schemes at Great Doddington and Little Irchester which are very visible on this route and only a 5 minute drive on the A509 from site F.</p> <p>We have requested that the Examining Authority should travel this regularly used route on a major road.</p>
CPRE-025	The Applicant notes this comment.	We assume that the Applicant does not contest that these receptors would experience significant sequential impacts from the different elements of the scheme
CPRE-026	The Applicant notes this comment.	We assume that the Applicant does not contest that receptors on this route would experience very significant sequential impacts from the different elements of the scheme
CPRE-027	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> .	We defer to wildlife consultees over wildlife matters but remain very concerned about the potential for contamination of FLL and the Nene in the event of a battery fire.



CPRE-028	<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 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>	<p>We agree that the impact upon these villages could be worse had there not been such a large land take for the scheme. However, although the scheme has been set back from these settlements they still have to be accessed by passing through or by solar infrastructure. This creates an industrialised context for these villages and represents a significant adverse impact upon their character and setting.</p>
CPRE-029	<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</p>	<p>Construction traffic will inevitably have an impact on local roads that they use. Although in some cases volumes may be low, they will not be predictable and so it would not be possible to plan recreation to be timed avoid it.</p> <p>The need for Link 81 is disputed as unnecessary and we await the Applicant's justification for its use.</p>



	<p>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 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	<p>Measurements were taken in general accordance with BS 7445-1:2003 The Description and Measurement of Environmental Noise: Guide to quantities 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 &lt;5m/s) during the survey.</p>	<p>In our comment we were highlighting that other applications contain appendices giving evidence and do not rely on consultees accepting the Applicant's word that the measurements were taken to standard. It is not unusual in applications for there to be disparities between the reported findings and the data upon which it is supposedly based. It is</p>



	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> .	usual to be expected to take the Applicant's word that surveys have been carried out correctly.
CPRE-031	<p>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 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>	<p>Under the Rochdale envelope it is neither appropriate nor acceptable to carry out noise modelling using the most favourable ground absorption factor (G=0.8 - soft ground).</p> <p>The times when noise would be likely to cause the greatest nuisance would be on hot days during the summer where the ground will be hard and residents will be enjoying their outdoor space or have their windows open for ventilation.</p> <p>Suggesting that modelling using soft ground should be acceptable casts further doubt on the reliability of the assurances that measurements have been carried out according to standard.</p>
CPRE-032	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	The wording within the Glint and Glare assessment implies that this has only been assessed for horse facilities and not for routes used by equestrians. Can this be confirmed?





	<p>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.</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>	<p>The BHS is not an expert on glint and glare and neither are equestrians required to report horses reacting to it. It is perhaps likely that the level of incidents might be low because riders choose to avoid routes that pass through or by solar farms in favour of more pleasant scenery and making it unusual for horses to encounter them.</p> <p>The BHS guidance contains the following considerations that should be taken into account as they are relevant to this scheme:</p> <ul style="list-style-type: none"><li>• Constraining width of bridleways or byways can feel intimidating with the loss of adjacent open space.</li><li>• Inverter buildings near rights of way should be constructed to minimise transfer of sound.</li><li>• Tracker arrays should not be adjacent to bridleways or byways until their noise and movement can be assessed for impact in mature developments.</li><li>• If bridleways or byways are alongside or through sites, care must be taken not to create a narrow corridor. Fencing can be intimidating, especially at this height, and create a need for vegetation control, or, if solid, create a drainage or poached surface problem by preventing light and air reaching the surface. A narrow corridor may also potentially create conflict from users being confined, with no 'escape space' from a threat as would be the case with an open field. The need to maintain adjacent hedges and surface vegetation so as not to further reduce the available width should also be considered, as well as vehicular access for maintenance if appropriate.</li></ul> <p>These considerations are of particular concern at Site G which is adjacent to the Three Shires Way long distance bridleway and a vital resource for clients of Lower Farm Stables and other</p>
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		<p>equestrians in Lavendon. The bridleway is constrained on the eastern side by a ditch and woodland or hedgerow but currently open towards Site G.</p> <p>The BHS recommend that tracker panels should not be used adjacent to bridleways and that the minimum unrestrained width of the bridleway should be at least 5m if not more given the current openness of the site.</p> <p>During wet periods sections of the bridleway already become extremely muddy. The planting proposed would inhibit light and air reaching the surface of the bridleway potentially making it even more muddy if not impassable.</p> <p>The BHS advice has brought to light a particular concern for the viability of equestrian businesses where it states that “Horses may react to a new solar structure as they might to anything different in their environment, but will quickly accept it (when introduced appropriately).” Although this might sound reassuring it places a huge barrier to client recruitment. After all, why would a client choose to stable their horse where it has to be carefully introduced to a hazard when there are alternatives that have no such restriction?</p>
CPRE-033	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	<p>The Applicant’s response is effectively completely dismissive of glint and glare yet there is a requirement for an ES to contain a glint and glare assessment.</p> <p>The particular issue with horses on bridleways is that they may perceive glint as movement and a threat and bolt. The brightness of glint is not a factor to it being perceived as a threat, merely its presence in their eyeline. A bolting horse is a danger to its itself, its rider and any other user of the bridleway.</p>



	<p>upon safety or amenity. As such, a nonsignificant effect is 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>	<p>Because the scheme security fencing would normally contain a bridleway, this increases the danger because the horse's escape routes are restricted.</p>
CPRE-034	<p>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.</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</b> of <b>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</b> of <b>ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]</b> have</p>	<p>There is great public concern about the hazards from a BESS fire and it is very concerning that the Applicant is so resistant to setting out measures that would reassure the public.</p> <p>The ES does not model a prolonged fire as occurred in Liverpool and so cannot be considered to have addressed the worst case as suggested.</p> <p>Because of the unusual proximity of the BESS to the village of Grendon and other individual properties we feel that it essential that the DCO is not made without at the very least having a draft evacuation plan in place. This would be consistent with the Rochdale envelope by covering off the worst case scenario.</p>



	<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> <p>[[table omitted]]</p> <p>As indicated in <b>Table 9 of 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 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 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</p>	
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	<p>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. 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.</li></ul> <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, impacts on local respondents, impacts on transport infrastructure.”</p>	
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	<p>Section 2.4.2 of the OBSSMP stipulates: 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> <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 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>.</p>	
CPRE-035	<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</p>	<p>This response ignores the fact that the detrimental impact on the experience of using PROWs would deter their use regardless of their availability. This is indirectly acknowledged in the predicted loss of employment in leisure.</p>



	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> .	
CPRE-036	<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. 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>	<p>As stated in our representation, construction jobs are short-term and are anyway unlikely to create significant employment locally.</p> <p>It is important to note that only 8 of the 15 FTE jobs created are anticipated to be created locally. This does not even replace the jobs lost in agriculture, let alone those lost in leisure.</p>
CPRE-037	<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 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</p>	<p>The Applicant does not deny that they predict a net loss of local employment during the operational phase due to job losses in both agriculture and leisure which outweigh the jobs created to maintain the scheme.</p> <p>Does the Applicant propose a compensation scheme for business that are forced to close?</p>



	<p>'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>	
CPRE-038	<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 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</p>	<p>As stated in our representation, the ground rent would predominantly be received by absentee landowners and not enter the local economy.</p>



	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.	The OSOCEP only outlines possible activities and not any commitments. Unless there are commitments built into the DCO there is no guarantee that any measures will materialise.
CPRE-039	<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 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>).</p>	As stated in our representation we consider that the Applicant understates the level of impact.
CPRE-040	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.	This response and the Applicants assessment in the ES are not credible. Walkers choose routes that are attractive, tranquil and offer open views. They will not return to PROWs that are have been industrialised by solar infrastructure that creates noise or choose paths that are contained by screening. They





	<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 mental and 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 PROWs, 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>	<p>will either seek alternative walks elsewhere or, in the worse cease going for walks. This will inevitably be harmful for health and wellbeing.</p>
CPRE-041	<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> <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>	<p>This response does not explain why the scheme has such a large land take in comparison to other schemes. The fact that it is predominantly BMV land exacerbates the wasteful nature of the design. Site F is particularly bewildering because the areas of panels are scattered around the site.</p>



CPRE-042	<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 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>	<p>The figures given by the Applicant show that grazing on solar farms is the exception and not the rule. Under the Rochdale envelope it must be assumed that grazing would not occur.</p> <p>The vast acreage of the scheme also raises questions about what size flock would be required to fully utilise it, whether enough shepherds could be recruited to manage them and whether such a large number of sheep would be marketable.</p>
CPRE-043	<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 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.</p>	<p>We do not find this response credible.</p> <p>The key destructor of soil quality is compaction as recognised in the Blackberry Lane decision. Compaction harms the texture and decreases drainage leading to increased wetness.</p> <p>The management of the wildflower areas requires that the nutrient levels should be kept low by removing organic matter and so it is hard to see that these could be improved by organic matter.</p> <p>We have also seen concern raised that panels leech contaminants into the soil which could make it unusable for agricultural purposes.</p>
CPRE-044	<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>This response does not address the fact that the likelihood of a fire increases in proportion to the number of BESS units at a location. It is a simple case of basic statistics. If the risk for a 1MW unit is <math>x</math> then the risk for 600MW of units is <b>600x</b>.</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> <p>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.</p>	
CPRE-045	<p><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 receptor are presented in <b>Table 9</b> of <b>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</p>	<p>This response does not answer the question posed. A temperature inversion is not a typical weather condition but one that would trap fumes where they are produced.</p>



	<p>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> <p>[[table omitted]]</p> <p>As indicated in <b>Table 9 of 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 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</p>	
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	<p>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 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	<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> <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>The Rochdale envelope requires that the worst case is used and not the “typical case” which could bear no relation to the BESS that will be deployed. The Liverpool fire lasted 72 hours and should be taken as the worst case.</p> <p>It is not sufficient to calculate the fire water requirements at a later date because it is necessary to ensure that there is sufficient capacity to retain the contaminated water onsite. A further concern is that arrangements for swift removal of the contaminated water should be in place so that there is storage for runoff and the possibility of containing another fire.</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 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. 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-</b></p>	
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	<p><b>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 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>	
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CPRE-047	<p>Section 5.5.8 of the <b>OBSSMP Revision A [REP-143]</b> documents: 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. 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). 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. This is secured through the <b>Draft DCO Revision A [REP1-008]</b>.</p>	<p>The Applicant's response does not address the issues raised merely seeks to avoid providing an Emergency Response Plan before the DCO is made.</p> <p>Please refer to our comments at CPRE-0034 which also apply to this issue.</p> <p>The specific point about residents at Pastures Farm having to travel towards the fire in order to evacuate has not been addressed.</p>
CPRE-048	<p>Please refer to the Applicant's response to comment 'CRNBPC 003' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>. The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. 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. 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>	Our comments stand.





CPRE-049	<p>Please refer to the Applicant's response to comment 'CRNBPC 003' in <b>The Applicant's Response to Relevant Representations [REP1-161]</b>. The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. An indexed copy of the detailed LVIA assessment has been provided at Deadline 1 <b>[REP1-041]</b>.</p>	<p>Although it makes no material difference, we feel that the Applicant has made the inspection of their application unduly difficult and that they have only provided assistance after the time when it would have been useful. It is interesting to again contrast the Greenhill scheme with the Tillbridge scheme. The Greenhill ES has 507 documents and the Tillbridge scheme 179.</p>
CPRE-050	<p>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.</p>	<p>The Applicant has stated that they do not intend to retain the scheme for its lifetime. The scheme at Little Irchester was promised a community fund that disappeared on the first change of ownership. We consider it essential to incorporate the community benefit scheme into the DCO if it is made.</p> <p>The reluctance of the Applicant to incorporate such a provision into that DCO raises great concern that they intend to allow the same to happen with this scheme because it would increase the value of the scheme to the new owner.</p>
CPRE-051	<p>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.</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</p>	<p>This response does not address the concern about guaranteeing the funding for decommissioning. Without a scheme that guarantees funding the final owner of the scheme can leave the company with insufficient resources to fund decommissioning and abandon the scheme without consequences by declaring bankruptcy.</p> <p>The reluctance of the Applicant to incorporate such a provision into that DCO raises great concern that this is the plan.</p>



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	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.	
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**CPRE Northamptonshire**

**Registration identification number: F16E37A6E**