

Green Hill Solar Farm responses to ExQ2 and Comments on
Responses to Written Representations (Deadline 3)

Trading as FC & CC Elderton

Re: Land at Glebe Farm, Great Doddington, Earls Barton and of The Meadows, Earls Barton.

1. Background

1.1 We are instructed on behalf of Trescella and Ben Elderton, trading as FC & CC Elderton of Glebe Farm, Great Doddington, Earls Barton, Northamptonshire, to respond to the Examining Authority's Second Written Questions (ExQ2) and to comment on the Applicant's responses to our Written Representations (REP2-048) submitted at Deadline 2.

1.2 These responses are made Without Prejudice to making further representations for different reasons or in order to amplify these representations.

2. Responses to ExQ2 - Q2.2.1 - 'Design parameters and other details of the proposed development'

2.1 The Applicant's response (ELD-004) fails to adequately address the concerns raised in our Written Representations (in particular paragraphs 3.1 and 3.7), as it is non-committal and lacks sufficient detail to enable the likely impacts to be properly assessed. Whilst the size of the compound is a consideration, the primary issue is its proposed location within a larger parcel of land. If the compound is located as it is proposed at the furthest point from the public highway, with access provided via a track bisecting land to the west of the cable route, this would materially compromise the ability to carry out normal agricultural operations across at least half of the field.

2.2 Locating the compound to the east of the cable route would allow the land to the west to remain in agricultural use and would significantly reduce operational disruption and consequential losses. If the presence of overhead lines prevents the relocation of the construction compound, we expect our clients to be adequately compensated for any disturbance or injurious affection caused to the retained land. In the absence of a defined and secured compound location, the Examining Authority cannot be satisfied that the proposed design has been minimised so far as reasonably practicable or that impacts on the farm business have been adequately mitigated.

3. Comments on Applicant's Responses to Written Representations – Deadline 1

3.1 ELD-001 & ELD-009

The Applicant's statement that "we have agreed that the cable will be positioned as far from their farm buildings as possible within the Order Limits" is expressly caveated by the qualification that this will be "subject to surveys post-consent and detailed design". This introduces an unacceptable degree of flexibility at a point when the Examining Authority is required to assess the likely significant effects of the development and the adequacy of mitigation. There is a clear risk that matters of convenience or cost will subsequently be relied upon as 'design constraints' to justify a cable alignment that is materially closer to the farm buildings than is necessary.

Once the Development Consent Order is made, there will be very limited opportunity to influence or secure changes to the cable alignment. It is therefore essential that the alignment is resolved through the Examination and not deferred to post-consent stages. In this regard, we maintain that the 50-metre corridor has not been aligned as closely as reasonably practicable to the existing overhead lines, particularly in the vicinity of the farmyard. The Applicant appears to have prioritised a flatter and, by inference, more cost-efficient route over one which would minimise adverse effects on the agricultural holding.

The absence of any "lift and shift" provision within the proposed easement design further exacerbates this issue, as it would permanently sterilise future farm operations and potential development opportunities. This is inconsistent with established decision-making principles, which require flexibility to be tightly controlled and justified where it may give rise to materially different or greater impacts. In the event that a "lift and shift" solution is not feasible, we expect that our clients will be adequately compensated for the detrimental effects caused.

Accordingly, we reiterate our request that the cable route and associated construction compound be amended now, preferably to follow the easternmost boundaries adjacent to the A45. This would materially reduce harm to the farm business and the local environment and would provide the Examining Authority with the certainty necessary to conclude that the scheme has been designed to minimise land take and adverse effects so far as reasonably practicable.

3.2 ELD-004

Please refer to paragraph 2.1 and 2.2 above.

3.3 ELD-007

Please refer to paragraph 2.1 and 2.2 above.

3.4 ELD-008

It is our position that any traffic management measures required on Doddington Road in close proximity to the A45 junction are likely to give rise to significant congestion, with tailbacks potentially extending onto the A45 dual carriageway. Such congestion would materially impede access to our client's farm shop and is likely to deter or dissuade regular customers travelling from Wellingborough, Great Doddington, Wollaston, Wilby and, to a lesser extent, Northampton. In the absence of detailed and secured traffic management arrangements, the Examining Authority cannot be satisfied that the temporary impacts on the local highway network and on the viability of the farm shop have been adequately assessed or mitigated. We therefore request that the section of cable that crosses Doddington Road be installed by directional drilling rather than open trenching, in order to minimise disruption to Doddington Road and to avoid the removal of trees or extensive ground works that would otherwise be required.

4. Requests for Protective Measures and Design Amendments

4.1 To minimise impacts on the agricultural holding and local highways, we request the following measures be secured through the DCO or associated requirements:

4.2 Construction Compound – Relocate the compound to the easternmost boundaries adjacent to the A45 to allow continued farming on land west of the cable route. The location must be fixed and not subject to post-consent design flexibility.

4.3 Cable Alignment – Align the cable as far from farm buildings as reasonably practicable. Include "lift and shift" provisions in the easement design to avoid sterilising future farm operations or development opportunities.

4.4 Traffic Management and Doddington Road Crossing – Install the cable under Doddington Road by directional drilling rather than open trenching to minimise congestion, prevent tailbacks onto the A45, and avoid the removal of trees or

extensive ground works that would otherwise be required. Any traffic management measures must be fully detailed, agreed in advance, and secured through the DCO.

4.5 These measures are necessary to minimise land take, operational disruption, and environmental impacts, and to provide the Examining Authority with certainty to assess the proposal.