# COMMENTS ON MATTERS RAISED IN THE APPLICANT'S RESPONSES (REP2-048 and REP2-050)

## Introduction

These comments on the Applicant's responses at Deadline 2 to matters relevant to the Written representations of Stop Green Hill Solar (and supporting documents). The Applicant's responses are set out in the following documents:

- GH8.1.13 Applicant Responses to Written Representations **(REP2-048)**; and
- GH8.1.15 Applicant Responses to Deadline 1 Submissions (Including those by SGHS) **(REP2-050)**.

These notes focus on matters relevant to site selection and design. They also comment on heritage matters and a few miscellaneous points relevant to the SGHS Written Representations.

| **GH8.1.13 Applicant Responses to Written Representations (REP2-048)** | | | |
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| The responses to the Written Representations by SGHS are set out in Section 5.6 (pages 222 to 298 of GH8.1.13) | | | |
| ***Ref.*** | ***Summary of SGHS Reps.*** | ***Summary of Applicant's Response*** | ***Comment*** |
| **SGHS-001 (page 222)** | ***Site selection***<br>a. That the proposal is not "close to" a grid connection as per EN-3 2.10.25;<br><br>b. That is design is driven by a requirement to deliver 500MW scheme;<br><br>c. That the scheme is driven by land ownership considerations rather than proper planning considerations. | The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. Details of the process are set out in **Appendix 5.1: Site Selection Assessment of the Environmental Statement Revision A** | The response of the Applicant simply restates what is set out in the in **ES Chapter 5: Alternatives and Design Evolution of the ES [APP-042];** and **ES Appendix 5.1 Site Selection Assessment of the Environmental Statement Revision A [EX1/GH6.3.5.1_A].** The response does not address the matters raised by SGHS that:<br>a. That the proposal is not "close to" a grid connection as per EN-3 2.10.25 – and is therefore not compliant with NPS guidance; |

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| | | **[EX1/GH6.3.5.1_A]** Please also refer to **ES Chapter 5: Alternatives and Design Evolution of the ES [APP-042].**<br><br>NPS EN-3 outlines key influencing factors for site selection and design. These have been considered throughout the site selection process with a summary of response outlined in **Environmental Statement Chapter 5: Alternatives and Design Evolution [APP-042].** This includes irradiance and site topography, network connection, proximity of a site to dwellings, agriculture land classification and land type, accessibility, Public Rights of Ways as well as any additional environmental considerations.<br><br>The Site Selection Process, widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area **ES Appendix 5.1 Site Selection Assessment Revision A [EX1/GH6.3.5.1_A]** in compliance with National Policy Statement for Energy (EN 1) and National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Connection on | b. That is design is driven by a requirement to deliver 500MW scheme – rather than proper planning policy considerations;<br>c. That the scheme is driven by land ownership considerations rather than proper planning considerations<br><br>**Proximity of the grid connection**<br>EN-3 para.2.10.25 should be read in context.<br>• Para 2.10.24 refers to availability of network capacity, and the distance from the solar farm to the existing network (footnote 84) can have a significant effect on the commercial feasibility of a development proposal (footnote 84 states that the route and type of terrain traversed by the cabling linking the solar project to the grid connection may also have an impact on the project's viability).<br>• Para 2.10.25 states that to maximise existing grid infrastructure, ***minimise disruption to existing local community infrastructure*** or biodiversity and reduce overall costs, ***applicants may choose a site based on nearby available grid export capacity*** (my emphasis). |

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| | | commercial feasibility and the efficiency of the transmission of electricity to the grid, to avoid the use of BMV land as much as possible. | **Whilst proximity to a connection will be a benefit for an applicant, it is also necessary to minimise impacts on the community.**<br><br>• EN-3 refers to EN-5 at Para 2.10.21 in the context of network connection. EN-5 para 2.2.26 refers to the locational issue of grid connection but this constraint does not exempt applicants from their duty to consider and balance site-selection considerations set out in NPS and the policies on good design and impact mitigation (detailed in sections 2.4-2.9).<br><br>**There is no guidance in NPSs as to what "proximity" is. There is not endorsement of 20 Km (or anything like such a distance) as being in proximity. The potential consequence of development which is not in proximity to a grid connection is harm to the community. Demonstrable harm arises in this case.**<br><br>**The chronology of the design process:**<br>• No alternative grid connection points were considered because of the immediate availability of 500 MW capacity at Grendon (ES Chapter 5, para 5.6.3) |

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| | | | • 100ha required to deliver 50MW hence 1,000ha necessary for 500MW – plus 10% to allow for additional mitigation measures. (ES Chapter 5, para 5.6.5)<br><br>• Land close to Grendon was considered. The area of search was extended until sufficient land was identified with willing landowners within a 20km radius (ES Chapter 5, para 5.6.6). The 20km distance is justified as being the maximum distance feasible from Grendon, balancing this against the need to find a site with reduced environmental effects (supported by the site selection exercise) (ES Chapter 5, para 5.6.9).<br><br>**It is quite clear reading ES Chapter 5 paras 5.6.6 to 5.6.10 that land ownership was the key determinant not planning or environmental considerations. The consequence is that avoidable harms arise to legitimate planning and environmental matters because the site selection process is landowner led.** Planning and environmental matters are only addressed in Stage 2 of the site selection process.<br><br>However, Stage 2 does little more than set out key planning considerations of topography; agricultural land classification; land designated of international and national |

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| | | | ecological value; geological sites; nationally designated landscapes; and proximity to human receptors. The only commentary is for agricultural land (paras. 5.6.11 – 5.6.13). It states that all land of Grades 1, 2 and 3 was excluded (on the basis that the Natural England ALC maps do not distinguish between grades 3a and 3b land. Consequently, at Stage 2:<br>• land with willing landowners had been identified<br>• the area of search has been defined by the availability of land<br>• designated sites have been excluded<br>• Grades 1, 2 and 3 agricultural land was excluded<br>• Land close to human receptors was excluded (although no information on the parameters is provided)<br><br>Stage 3 identifies two potential development areas ("PDA"):<br>• PDA 1: Yardley Hastings to Olney (1,167ha)<br>• PDA2: Higham Ferrers to Bedford (1,113ha)<br><br>Stage 4 is an evaluation of the identified PDAs and concluded that both were unsuitable.<br><br>Stage 5: widening the search to consider BMV land within the 20km search area (bearing in mind the search area is |

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| | | | defined by the availability of land with owners willing to sell)<br><br>Para 5.6.30 refers to the Farming Report (GH6.3.20.2) and para.5.6.31 states that land agents were contacted regarding potential willing landowners in the area – **How does this square with Stage 1 – Para 5.6.6 states that the 20km area of search was defined by reference to willing landowners.**<br><br>The significance of willing landowners to the site selection process is emphasised in para.5.6.35 – plus an objective to compile a site with as few land ownerships as possible *"…to minimise project complexities (including engineering, design and mitigation measures), legal complexities and project cost"*<br><br>Para. 5.6.36 states that "other areas of Grade 3 land (does not specify whether this is 3a our 3b) within the 20km search area, were identified following the desk based review, but discounted due to a to lack of willing landowners and smaller land ownerships which were viewed as unviable due to project complexity. **There is no evidence about viability before the examination.** |

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| | | | In summarising the assessment of alternatives para 5.6.42 states that the selected sites are within ten land ownerships, and this small number of landowners is advantageous in terms of minimising project complexity, legal complexity and cost. The point is emphasised again in para 5.6.45 - the focus of the site selection process was on the large-scale landownerships which were identified by agents as having potentially willing landowners. Para 5.6.44 states the justification for not addressing unconstrained Grade 3 land because **it was not considered proportionate**.<br><br>**Consequently, within the area of search (defined by willing landowners) no consideration of whether more suitable land Grade 3b is available and there have been no consideration of whether other land not owned by the identified willing landowners would be more appropriate.**<br><br>**The application cannot demonstrate the minimum BMV land is being taken to deliver the scheme.**<br><br>Para.5.6.67 – the benefits of a willing landowner… |

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| | | | Initial site search omitted all Grade 3 land Appendix 5.1 para 2.2.3<br><br>Viability referenced in Appendix 5.1 para 2.2.7 and 2.2.8 Appendix 5.1 para 2.2.25:<br>"*Due to the large extent of Grade 3 agricultural land within the site area and in order to focus the search on available land. Land agents were contacted regarding potentially willing landowners within the area. The availability of willing landowners is an important consideration because it is typical for the land to be leased rather than permanently acquired due to solar farms consisting of temporary structures. In the absence of willing landowners, it would be necessary to permanently acquire land through compulsory acquisition powers which the Applicant sought to avoid. It is also desirable to compile a site in as few land ownerships as possible to minimise project complexities (including engineering, design and mitigation measures), legal complexities and project costs.*"<br><br>• Para. 2.3.11 The sites are within 10 ownerships<br>• Para.2.3.12 Detailed ACL surveys undertaken on the land within the 10 ownerships.<br>• Para.2.3.13 Focus of the site selection process was on large scale land ownerships with willing landowners. |

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| | | | Stage 2:<br>Appendix 5.1 Annex D: Assessment Indicators and Evaluation Criteria; and Annex E: Criteria Table no consideration of BMV Land |
| **SGHS-002 (page 223)** | ***Site selection***<br>By ref to Chapter 5 of the ES:<br>a. Starting point – availability of a connection. No alternatives considered.<br>b. Scale dictated by the requirement to deliver 500MW.<br>c. Willing large scale landowners<br><br>No planning considerations taken onto account.<br><br>2nd stage to filter out land unsuitable because of topography and avoid designated sites.<br><br>Then to avoid the use of BMV and human receptors | The first stage of the site selection process, in having a grid connection is key as this defines the feasibility of the Scheme. Without a defined and agreed grid connection, the Scheme would be potentially unfeasible.<br><br>Once the Point of Connection was agreed an initial search radius was defined based on commercial feasibility and need to find a site with reduced environmental effects. The initial review of environmental considerations included seeking to minimise impacts on the best and most versatile agricultural land (defined as grades 1, 2 and 3a) and preferably use land that is not classified as best and most versatile (grades 3b, 4 and 5) and where possible utilise previously developed land, brownfield land, contaminated land or industrial land. | There is no evidence before the ExA about feasibility or viability of the proposal. However, it is not suggested that a scheme could be designed without a grid connection – the point is that no alternatives have been considered. |

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| | | The use of previously developed (brownfield) land and commercial roof-tops was considered. There was no brownfield land that met the minimum individual site size threshold nor the area of approximately 1,100 ha required for a network of sites in proximity for the Scheme, identified within the 20km search area from the Grendon Substation PoC.<br><br>The Natural England ALC provisional mapping, as outlined on **ES Figure 20.3 [APP-533]**, indicates that the majority of the land within the 20km search area is Grades 3 or 2 BMV, with the remaining land being primarily urban development associated with nearby residential areas or non-agricultural land ranging from ancient woodland to airfields. The **Farming Report [APP-571]** sets out that within the wider area the land is almost all in either the 20-60% BMV or >60% BMV category. It is notable that much of Northamptonshire, particularly to the north and southwest of Grendon, consists predominantly of higher grade land, with a mixture of Grade 2 and Grade 3 often with both Grade 2 and Grade 3 land in individual fields. Due to the large extent of Grade 2 and Grade 3 | |

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| | | agricultural land within the 20km search area and in order to focus the search on available land, land agents were contacted regarding potentially willing landowners within the area.<br><br>NPS EN-3 does not prohibit the use of BMV land and recognises that NSIP scale solar schemes are likely to include some agricultural land, with the preference being to prioritise poorer quality land. To deliver the proposed capacity for the Scheme, it was therefore considered likely that a significant percentage of BMV land would be required. EN-3 states at paragraph 2.10.29 that applicants should avoid the use of BMV 'where possible,' and this is what the Applicant sought to do in its site selection process. | |
| **SGHS-003 (page 226)** | ***Site selection***<br>Site selection unapologetically based on the presence of willing landowners will sufficient land to deliver a 500MW scheme as agreed with National Energy System Operator (NESO)<br><br>More land is included far more land than necessary – no limit is proposed on the capacity of the scheme. | In response to the first point raised, understanding the availability of landowners that are willing to enter into voluntary agreements is an important part of the site selection process.<br>Compulsory acquisition powers can only be included in a DCO where they can be justified for the Scheme. | ES Chapter 5, para 5.5.3:<br>• Connection agreement for 500MW at Grendon sub station<br>• To be delivered by 2030<br>• A smaller scheme would not deliver 500MW nor be delivered by 2030. |

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| | More than 500MW could be generated by the proposal.<br><br>* Was it an offer or a commitment to deliver? | Therefore, the availability of willing landowners reduces the need to rely on the use of compulsory acquisition powers to deliver the Scheme. Please refer to the **Statement of Reasons [APP-019]** for a full explanation of why compulsory acquisition powers have been included in the **Draft DCO Revision A [REP1-008]** and the reasons why this is justified.<br><br>In response to the second point, as outlined in the **Grid Connection Statement [APP-557**] 'The connection offer was accepted in the form of a Bilateral Connection Agreement (BCA) between the Applicant and NESO, allowing for a Transmission Entry Capacity (TEC) of 500 MW (AC) export to and 500 MW (AC) import from the NETS. This was entered into in June 2021. The acceptance of the connection offer demonstrates that a connection at the Point of Connection is technically and financially viable.' This goes on to say 'The Grid Connection Agreement allows the Applicant to export the electricity produced at Green Hill A, A.2, B, C, D, E, F, and G, not to exceed 500 MW (AC). It also allows for the import of up to 500 MW (AC) of electrical energy to be stored in an | What is not addressed is whether the scale of this proposal in terms of land take is necessary to deliver the 500MW. ***Reference to the statement on need APP/GH7.12)*** |

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| | | Energy Storage Facility (for the purposes of the Application, this is assumed to employ battery technology and therefore referred to as a 'Battery Energy Storage System' or 'BESS' throughout this Application), located at Green Hill BESS and/or Green Hill C, to be exported at a different time, back to the NETS'.<br><br>Additionally, National Policy Statement for Renewable Energy Infrastructure (EN-3) states at paragraph 2.10.55: "The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays."<br><br>The footnote corresponding to this paragraph states: ""Overplanting" refers to the situation in which the installed generating capacity or nameplate capacity of the facility is larger than the generator's grid connection. This allows developers to take account of degradation in panel array efficiency over time, thereby enabling the grid connection to | |

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| | | be maximised across the lifetime of the site. Such reasonable overplanting should be considered acceptable in a planning context so long as it can be justified and the electricity export does not exceed the relevant NSIP installed capacity threshold throughout the operational lifetime of the site and the proposed development and its impacts are assessed through the planning process on the basis of its full extent, including any overplanting." | |
| **SGHS-004 (page 228) to SGHS-007 (page 232)** | **Ecology and Biodiversity** | | See separate document **Response on Ecology** |
| **SGHS-008 (page 238) To SGHS-015 (page 245)** | **Hydrology and Flood Risk**<br>• Sequential Test<br>• BESS Location<br>• Flood Risk and Access<br>• Flood Risk and the Potential for Pollution<br>• Surface Water Runoff and Localised Flooding at Lavendon (Site G) | | See separate document **Response on Flood Risk And Policy Compliance**<br><br>With regard to the location of the BESS at Grendon and the prospect of access to the BESS being prevented due to flooding evets on Station Road, the oral evidence of Mr Rigby for the Applicant at ISH-2 indicates that:<br>• Hydraulic modelling shows that parts of Station Road are liable to flood – it is asserted that the proposed development would not lead to a great risk of flooding;<br>• In response to a question raised by Richard Humphreys KC for SGHS, Mr Rigby stated that "the access" does not flood during the one in 10 year flood event. |

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| | | | However, the area covered by the hydraulic model is the site of the Grendon BESS and land to the south west. This is illustrated on Figure 3: EA Grendon Brook Model Coverage of the hydraulic modelling technical note **(RET-2052). The model covers a limited are and does not include Station Road to the west where there is clear evidence of flooding which restricts passage on the road and access to the BESS site (see the Schedule of Flooding Incidents on Station Road REP1-228).**<br><br>**The incidence of flooding on Station Road is evidentially greater than predicted by the model (because the model is concerned with a very small stretch of Station Road immediately adjacent to the BESS Site). This is of critical importance in the context of access for emergency responders in the event of an incident at the BESS site.**<br><br>With regard to flooding at Site F at Lavendon SGHS rely on the submissions of Mr Griffiths at ISH-2. |
| **SGHS-016 (page 248) to SGHS-027 (page 265)** | ***Cultural Heritage*** | | The matters relevant to cultural heritage have been addressed in ISH-2 (and summarised in the Summary of Oral Representations by SGHS to ISH-2).<br><br>**The key point is that the approach to site selection does not minimise impacts on designated and non-designated heritage assets. The assertion that the proposal cannot be amended to reduce the levels of harm because it would impact adversely on the viability of the project is not supported by any evidence whatsoever.** |
| **SGHS-028 (page 265)** | **Landscape and Visual Impact**<br>The main points identified in the assessment of the Application by Carly Tinkler are summarised as follows: | The Applicant notes this comment.<br>The LVIA [APP-045] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the | The matter of landscape 'fabric' and the failure to assess effects on the overall character of the sites is explained in **REP1-195** SGHS/CT.1 Landscape and Related Matters Statement, paras. 2.3.2 – 20. It would be helpful if the Applicant could respond to the specific points raised. |

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| | A. Methodological Concerns with Applicant's LVIA:<br>• The LVIA misuses the term "landscape fabric" and fails to assess the overall character of the sites, contrary to GLVIA3 guidance.<br>• The LVIA does not identify national and local character areas/types as landscape receptors, which is a significant departure from best practice.<br>• Effects on National Character Areas (NCAs) were improperly scoped out, despite their relevance. | 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 ES Appendix 8.1 [APP078 & APP079], which has been progressed and agreed with the Local Planning Authorities. | The matters of not identifying national and local character areas / types as landscape receptors, and scoping out effects on NCAs, is explained in **REP1-195** SGHS/CT.1 Landscape and Related Matters Statement, paras. 2.3.21 – 31. It would be helpful if the Applicant could respond to the specific points raised. |
| **SGHS-029 (page 266)** | **Landscape and Visual Impact**<br>B. Assessment Criteria Issues<br>• The LVIA uses unbalanced four-point scales (e.g., High to Very Low) without a "Very High" category, potentially skewing results.<br>• Criteria for value, susceptibility, and sensitivity are unclear and not tailored to the specific landscape context.<br>• The LVIA conflates value and susceptibility inappropriately, leading to flawed sensitivity judgments. | The Applicant notes this comment. Please see response to SGHS-028. | These matters are explained in **REP1-195** SGHS/CT.1 Landscape and Related Matters Statement, Section 2.4. It would be helpful if the Applicant could respond to the specific points raised. |

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| **SGHS-030 (page 266)** | **Landscape and Visual Impact**<br>C. Landscape Sensitivity & Value<br>• The LVIA underestimates landscape value and susceptibility across the sites.<br>• Site A, for example, is judged by the LVIA as Medium sensitivity, but the review finds it to be High–Medium due to historic character, tranquillity, and recreational use.<br>• The LVIA fails to assess the value of entire sites, focusing only on individual elements ("fabric"). | The Applicant notes this comment. Please see response to SGHS-028. | These matters are explained in **REP1-195** SGHS/CT.1 Landscape and Related Matters Statement, Section 3. It would be helpful if the Applicant could respond to the specific points raised. |
| **SGHS-031 (page 267)** | **Landscape and Visual Impact**<br>D. Mitigation & Enhancement<br>• The LVIA double-counts mitigation measures as enhancements, overstating benefits and underestimating adverse effects.<br>• Over-reliance on vegetation for screening is problematic due to uncertainties in plant growth, disease, and climate change impacts.<br>• No clear distinction between mitigation and enhancement measures; a detailed plan is needed. | The Applicant notes this comment. Please see response to SGHS-028. | These matters are explained in **REP1-195** SGHS/CT.1 Landscape and Related Matters Statement, Section 4. It would be helpful if the Applicant could respond to the specific points raised. |
| **SGHS-032 (page 267)** | **Landscape and Visual Impact**<br>E. Visual Effects | The Applicant notes this comment. Please see response to SGHS-028. | The Applicant does not appear to have included comments on **REP1-195** SGHS/CT.1 Landscape and Related Matters Statement, Section 6, |

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| | • The LVIA underestimates visual effects, particularly at Year 15, by assessing during summer (leaf-on) rather than winter (worst-case) conditions.<br>• Significant adverse visual effects are likely to persist at many viewpoints throughout the operation period, not just in the early years.<br>• The LVIA fails to conduct a full Residential Visual Amenity Assessment (RVAA), despite evidence that some properties may experience Major Adverse effects. | | which deals with effects on landscape character. It would be helpful if the Applicant could respond to the specific points raised in that section. Visual effects matters are explained in **REP1-195** SGHS/CT.1 Landscape and Related Matters Statement, Section 7. It would be helpful if the Applicant could respond to the specific points raised |
| **SGHS-033 (page 268)** | **Landscape and Visual Impact**<br>F. Amenity & Health Impacts<br>• The development would negatively affect residential, recreational, and social amenity, including tranquillity, views, and quality of life.<br>• Risks include noise, light pollution, glint and glare, and safety concerns from enclosed PRoW corridors.<br>• Potential for adverse effects on local businesses reliant on tourism and recreation. | The Applicant notes this comment. Please see response to SGHS-028.<br><br>The Applicant has assessed tourism and recreation receptors most likely to be impacted by the Scheme in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [REP1-079]. This includes local businesses and facilities reliant on visitors where it is anticipated that the Scheme may directly impact upon their ability to operate, and on individual tourism and recreation receptors such as local attractions, PRoWs, and sports venues. Industry impacts to | Applicant's response is noted. It confirms the assumption that the proposed development would result in adverse effects on the local rural economy.<br><br>It would be helpful if the Applicant could respond to the landscape and visual points raised. See also other comments and responses about effects on amenity and health. |

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| | | accommodation and food business, cultural facilities, and sports and recreation business more generally have been considered in the likely effect on visitor spending. The greatest level of effects to tourism are anticipated during the Scheme's construction, during which it is assessed there is a likely impact of a loss of up to 29 FTE jobs, equivalent to a loss of up to £1.66 million in visitor spending per annum in the Study Area. This is equivalent to 0.16% of the tourism economy in the assessed area and is therefore not anticipated to be significant.<br><br>Please refer to the Applicant's Response to Relevant Representation [REP1-161] at 'HUM-001, HUM-005, and HUM-006' in respect of assessment of impact on amenity, wellbeing, and access to leisure facilities.<br><br>The assessment undertaken in in ES Chapter 18: Human Health [APP-055] considers a wide range of health determinants that consider the physical health and wellbeing impacts of the Scheme. This include, but are not limited to, impacts on health from changes to air quality, and from noise and vibration. No | |

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| | | significant adverse effects to health and wellbeing are assessed as likely to occur at any phase of the Scheme. | |
| **SGHS-034 (page 269)** | **Landscape and Visual Impact**<br>The LVIA is preoccupied with "landscape fabric" which are individual components within the landscape such as landform, hedgerow, trees and woodland. This approach ignores landscape features (which are particularly important given the significant of church spires and towers in the landscape). Focusing on landscape fabric has resulted in there being no overall assessment of landscape character and the impact of development on that character. | The Applicant notes this comment. Please see response to SGHS-028. | See SGHS comments about this matter at SGHS-028 above. |
| **SGHS-035 (page 270)** | **Glint and Glare**<br>Glint and glare is addressed in Appendix 1 to the Landscape Statement (Document SGHS/CT.3). The conclusions are in summary:<br>• The method used / approach taken in the Glint and Glare Assessment ("GGA")114, to assess the Application is flawed and cannot be relied on for decision-making purposes; | The Glint and Glare Assessment has been undertaken based on industry guidance and good practice. The legislation and guidance followed completing the Glint and Glare Assessment is outlined in ES Chapter 15 Glint and Glare [APP-052] in section 15.3. The assessment methodology has been accepted in previous solar DCO applications, as well as by Local Planning Authorities across the UK. | Matters relating to glint and glare are explained in **REP1-193** SGHS/CT.3 Appendices to the Landscape and Related Matters Statement, Appendix CT-I.<br><br>It would be helpful if the Applicant could respond to the specific points raised.<br><br>Forest of Dean DC application ref P2061/21/FUL for solar development was refused planning permission, Rfr2 being that '*The proposal would be contrary to policy CSP.1 of the Core Strategy and policies AP1, AP2 and AP4 of the Allocations Plan and the advice in the NPPF and NPPG in* |

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| | • Levels of adverse effects would be higher than the GGA predicts, and for some visual receptors on and in close proximity to the site, potentially 'significant' adverse. Levels of adverse effects on landscape character would also be very high; and<br>• The GGA should be revised, and the LVIA / ecological / heritage assessments revised accordingly to factor in the results. | | *that it is considered that it has not been satisfactorily demonstrated that the proposal would not result in unacceptable impacts due to glint and glare on a wide variety of receptors. It is therefore considered that the proposal would not accord with policy CSP.1 of the Core Strategy, policies AP1, AP2 and AP4 of the Allocations Plan, and the advice in the NPPF, NPPG and the National Policy Statement for Renewable Energy (EN-3)'.* |
| **SGHS-036 (page 270)** | **Glint and Glare** | | It is asserted that the scheme has been designed to reduce impacts on heritage assets and that hedgerow screening and tree planning will further reduce impacts on the character of the Conservation Areas.<br><br>As noted above, the matters relevant to cultural heritage have been addressed in ISH-2 (and summarised in the Summary of Oral Representations by SGHS to ISH-2).<br><br>**The key point is that the approach to site selection does not minimise impacts on designated and non-designated heritage assets. The measures to enhance screening of solar arrays will fundamentally alter the open character of the setting of heritage assets.** |
| **SGHS-037 (page 272) To SGHS-039 (page 276)** | **Agriculture and Soils** | | The site selection process does not enable the Applicant to demonstrate that land of lower agricultural quality could not be used. See in particular the submissions of SGHS to ISH-2 and the **Summary of the Oral Submissions to ISH-2.** |

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| | | | In addition: **future grazing,** is addressed in **REP1-193** SGHS/CT.3 Appendices to the Landscape and Related Matters Statement, Appendix CT-H.<br><br>As per para. H1.14, it would be helpful if the Applicant could produce a note for the ExA listing examples and providing details of operational solar sites in the UK where currently, sheep / other animals are regularly grazed.<br><br>Also note that at para. 9.31 v), the Applicant's Farming Report [**APP-571**] refers to data from Defra's Land Use statistics for England for 2024. The figures appear to suggest that 50% of solar sites are grazed by sheep. However, SGHS has seen emails on the subject (and can make them available if required) in which Defra state that **the estimates exclude large-scale solar farms**<br><br>**Soil health and quality, is also addressed in REP1-193** SGHS/CT.3 Appendices to the Landscape and Related Matters Statement, Appendices CT-E, CT-F, and CT-G.<br><br>Regarding the Applicant's claims about the proposals resulting in '*better land quality in long term*' and '*beneficial effects on soil health and land quality*', see Appendix CT-F paras. F1.21 - 28. |
| **SGHS-040 (page 277) to SGHS-042 (page 279)** | **Human Health** | | The Applicant's comments are not an adequate or satisfactory response to matts raised by SGHS at Deadline 1 or at ISH-2 |
| **SGHS-043 (page 280)** | **Traffic and Transport** | | See the responses in relation to GH8.1.15 Applicant Responses to Deadline 1 Submissions (**REP2-050**) below. |

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| **SGHS-045 (page 282)** | **Traffic and Transport Access to the Grendon BESS** | | **See the response to SGHS-008 above** |
| **SGHS-046 (page 284) To SGHS-050 (page 292)** | **Major Accidents and Disasters** | | **See the SGHS Summary of Oral Submissions to ISH-2.** |
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## GH8.1.15 Applicant Responses to Deadline 1 Submissions (REP2-050)

The responses to the Deadline 1 submissions by SGHS are set out in Section 3.1 (pages 49 to 120 of GH8.1.15)
There is duplication in **REP-048** and **REP-050**. If matters have been addressed in the responding to **REP-048** they are nor repeated here.

| ***Ref.*** | ***Summary of SGHS Reps.*** | ***Summary of Applicant's Response*** | ***Comment*** |
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| **SGHS-001 (page 49) to SGHS-013 (page 67)** | **Hydrology and Flood Risk** | | See above |
| **SGHS-014 (page 68)** | **Transport and Access**<br>Routes and Access points | | • Lack of Stage 1 Safety Audits.<br>• No account of topography and site lines<br>• Appears to be a desk top exercise |
| **SGHS-016 (page 70)** | **Transport and Access**<br>Access points - A43 | | The A43 is one of the Counties most dangerous roads, with 3 deaths in the last 12 months. Turns on to the A43 with limited visibility is the major problem.<br><br>CC1 Compound now designated as large construction and parking compound which exits on to the A43 at CR4, this is the entrance to the Sywell Shooting Range. Currently only car users attend the Shooting Range. |

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| | | | HGVs created a significant danger due to their slow acceleration when pulling away. Turning right from the compound will be significantly more dangerous than turning left.<br>Consequently this location is totally unsuitable. |
| **SGHS-017 (page 70)** | **Transport and Access**<br>Access points Greenhill C | | • Access C1 is only a single lane, farm track of compacted hardcore. (Once used to install a small solar array for the local farmer).<br><br>• This access is opposite the entrance to Glebe - road and Beckworth Emporium, thus creating a Cross Roads. This road is a significant commuter route for North Wellingborough, Lt Harrowden, Burton Latimer, and Kettering, through to Northampton.<br><br>• Traffic management (traffic lights) will be imperative. Whilst in use, four -way lights will be required. Delays will be significant to commuters and the large numbers of shoppers to Beckworth Emporium. Commuters will avoid and come through Mears Ashby.<br><br>• Today, Friday 28th of November I counted 450 cars in the car park at lunchtime, given the churn of people throughout the day, I |

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| | | | would estimate that 750 cars would visit on anyone day.<br><br>• There are no traffic counters on the approach roads. Hence traffic figures quoted on the Sywell road will be grossly underestimated.<br><br>• Putting 92 BESS containers into 'C' along with a 400 KV Sub station, with all the ground works and equipment, the junction will be chaos for weeks/months<br><br>• See reference to Cottam and West Burton Solar Farm. HGV movements based on this contract! |
| **SGHS-018 (page 71)** | **Transport and Access**<br>Access points Greenhill C Highfield Road (5 no) | | • A single lane carriageway widened by use, over time. Now only 4.3m wide. Two lorries cannot pass, will have to use the verge. Car users will be intimidated by HGVs and end up in the verge.<br><br>• Access D1 is on the corner of Highfield Road and the Sywell Road, right outside Warner's Farmhouse. A fast road for commuters, access right on the junction, lorries turning into and out of the access slowly, as it is 1m lower than the road. 3way traffic lights the |

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| | | | only option. Traffic delays to commuters and school users will be significant.<br><br>• Scheduled and timed deliveries do not work. Lorries turn up at the wrong times, usually early. There is no HGV parking near any of these sites, Lorry drivers will pull up onto verges, creating dangerous situations and delays to others and getting stuck in winter months. |
| **SGHS-019 (page 73)** | **Transport and Access**<br>Comments on the OCTMP | | • vagueness of drawings, conflicting data, assumptions regarding traffic.<br><br>• Applicant states that HGV movements are based on Cottam Solar Project and West Burton Solar Project. These may be of similar size in acreage, but the layout and configuration the panels, fields roads and accesses, will bear no resemblance this application and it reflects the poor planning and lack of commitment to this project. |
| **SGHS-025 (page 79) to SGHS-031 (page 85)** | **Human Health** | | SGHS rely on its representations at Deadline 1, particularly **REP1-195** |
| **SGHS-032 (page 85) and SGHS-033** | **Glint and Glare** | | SGHS rely on representations submitted at Deadline 1, and ISH-2. |

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| **(page 87)** | | | |
| **SGHS-034 (page 87) to SGHS-039 (page 97)** | **Landscape and visual aspects**<br>**Cultural Heritage**<br>**Transport and Access** | | SGHS rely on the representations submitted at Deadline 1, ISH-2 and above in response to **REP2-048**.<br><br>**The Proposed development has not minimised harm to designated and non-designated heritage assets.** |
| **SGHS-040 (page 99) to SGHS-043 (page 101)** | **Agriculture and Soils** | | In addition, SGHS rely on the representations submitted at Deadline 1, ISH-2 and above in response to **REP2-048**. |
| **SGHS-044 (page 102)** | **Cultural Heritage** | | SGHS rely on the representations submitted at Deadline 1 and ISH-2 |
| **SGHS-045 (page 104)** | **General Matters** | | SGHS rely on the representations submitted at Deadline 1 and ISH-2 |
| **SGHS-046 (page 105)** | **Noise and Vibration** | | SGHS rely on the representations submitted at Deadline 1 |
| **SGHS-047 (page 106)** | **General Matters** | | SGHS rely on the representations submitted at Deadline 1, |
| **SGHS-048 (page 108)** | **Landscape and Visual Aspects** | | SGHS rely on the representations submitted at Deadline 1, ISH-2 and above in response to **REP2-048**. |

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| **SGHS-049 (page 110)** | **Ecology and Biodiversity** | | SGHS rely on the representations submitted at Deadline 1 and the Ecology Response at Deadline 3. |
| **SGHS-050 (page 110) to SGHS-056 (page 114)** | **Landscape and Visual Aspects** | | SGHS rely on the representations submitted at Deadline 1, ISH-2 and above in response to **REP2-048**. |
| **SGHS-057 (page 116) to SGHS-062 (page 118)** | **Cultural Heritage** | | SGHS rely on the representations submitted at Deadline 1, ISH-2 and above in response to **REP2-048**.<br><br>**The Proposed development has not minimised harm to designated and non-designated heritage assets** |
| **SGHS-063 (page 118) and SGHS-064 (page 118)** | **Ecology and Biodiversity** | | SGHS rely on the representations submitted at Deadline 1 and the Ecology Response at Deadline 3. |
| **SGHS-065 (page 119)** | **Planning** | | Noted. |
| **SGHS-066 (page 119)** | **Planning** | | The Applicant misses the point of the reference to ***Mead Realisations Limited v SSHCLG***. The Applicant summarises the issue addressed in the ***Mead*** Court of Appeal Judgement. The reference in representations was expressly to the judgement in the High Court (**REP1-215**) which summarises how a sequential assessment should |

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| | | | be undertaken. That part of the High Court Judgement was not an issue at the Court of Appeal. |
| **SGHS-067 (page 120)** | **General Matters** | | Noted. |
| **SGHS-068 (page 120)** | **Major Accidents and Disasters** | | SGHS Relies on representations at Deadline 1 and ISH-2 (including the Summary of Oral Representations). |