

# **Green Hill Solar Farm**

## **EN010170**

# **Applicant's Responses to ExA Second Written Questions**

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## Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 3

### Applicant's Responses to ExA Second Written Questions

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# 1 Introduction

1.1.1 This report responds to the Examining Authority's (ExA) second written questions, issued on 28 November 2025 **[PD-011]**. It responds to each of the questions posed to the Applicant.

1.1.2 Section 2 of this report is tabulated to include the ExA's questions and a response to each question as follows:

- General and cross-topic questions;
- Design, parameters and other details of the proposed development;
- The Environmental Statement (general);
- Need;
- Site selection and alternatives;
- Air quality and emissions;
- Biodiversity, ecology and natural environment;
- Habitat Regulations Assessment;
- Compulsory acquisition, temporary possession and other land or rights considerations;
- The draft Development Consent Order (DCO);
- Historic environment;
- Land use, agriculture and soils;
- Landscape and visual, including Glint and Glare;
- Noise and vibration;
- Socio-economics effects;
- Transport and traffic; and
- Water environment.





## 2 Topic Questions

### 2.1 General and Cross-topic Questions

ExQ	Respondent	Question	Applicant's Response
Q2.1.1	The Applicant	<b>Missing area on plans</b> An area of land including Construction Compound 1 is absent from the Schedule of Protective Ecological Buffers (Green Hill C) [APP-095] and the Landscape and Ecology Mitigation Plan C and D Option A (Revision A) [REP1-111]. Please update these plans, and any other plans and documents for which this is deemed necessary, to show the missing area.	Please refer to the Applicant's response to Q2.7.2 below with regard to areas included and excluded from <b>Environmental Statement Appendix 9.12 Schedule of Protective Ecological Buffers [APP-095]</b> . The figures in that Appendix only depict buffers within the solar sites (Green Hill A-G) and Green Hill BESS, and do not depict protective buffers within other parts of the Order Limits, such as the Cable Route Corridor or Construction Compounds.
Q2.1.2	The Applicant	<b>Terms within documents to be certified</b> Documents to be certified including, for example, the Outline Operational Environmental Management Plan Revision A [REP1-133] and the Outline Public Rights of Way and Permissive Paths Management Plan Revision A [REP1-148] refer to "the Applicant" but not to "the Undertaker". Should references to the applicant in such documents be amended to "the undertaker", in order to ensure that the draft development consent order and the documents it would secure would be consistent and effective?	<p>The "Applicant" is defined within those documents as Green Hill Solar Farm Limited which aligns with the definition of "undertaker" in the draft development consent order.</p> <p>The use of the Applicant in the outline management plans provides consistency with the wider application documents, including the Environmental Statement. It is considered clearer for the outline management plans to refer to the Applicant where they secure mitigation identified in the Environmental Statement.</p> <p>Green Hill Solar Farm Limited will become the undertaker upon the grant of the Order. The detailed management plans to be approved pursuant to the Requirements in Schedule 2 to the <b>draft DCO [EX3/GH3.1_C]</b> must be substantially in accordance with the outline management plans, enabling a change to the use of "undertaker" at that time to ensure complete consistency with the made DCO.</p>
Q2.1.3	The Applicant Interested parties	<b>Updated National Policy Statements for energy infrastructure</b> On 13 November 2025 government published its response to revisions to National Policy Statements for energy infrastructure. Final versions of the updated EN-1, EN-3 and EN-5 have been laid in Parliament for a 21-sitting day 'consideration period', before being published in December. The final paragraph of the government response document makes clear that: <i>"Once published, the updated 2025 NPSs (EN-1, EN-3 and EN-5) will have effect in relation to applications for development consent accepted for examination. For applications that have been accepted for examination before publication of the updated 2025 NPSs, the 2024 versions will underpin planning decisions."</i> The ExA will therefore be forming its recommendation based on the 2024 versions of the energy NPSs. However, is there anything in the updates to EN-1, EN-3 and/or EN-5 that you consider might be material in relation to the Green Hill Solar Farm application?	<p>The Applicant will provide an update to the <b>Planning Statement [REP2-043]</b> and the <b>Policy Compliance Document [REP2-045]</b> at Deadline 4 to confirm how the Scheme meets any updated policies in the revised National Policy Statements for energy infrastructure, as published on 13 November 2025. Whilst the Scheme will be determined in accordance with the NPS for Energy in force at the date the DCO Application was submitted, this will confirm the extent to which the Scheme nevertheless complies with the updated policies which the Secretary of State may consider to be important and relevant considerations.</p> <p>The <b>Statement of Need [APP-556]</b>, Section 4.5 discusses the April 2025 draft National Policy Statements EN-1, EN-3 and EN-5 and is consistent with the revised December 2025 updates around Clean Power 2030 Capacity Ranges not being a target, but a pathway to support achieving Net Zero 2050.</p>
Q2.1.4	The Applicant	<b>Importing electricity to the Battery Energy Storage System (BESS)</b> The ExA notes from the Grid Connection Statement [APP-557] that the grid connection agreement allows in addition to the	Chapter 4 of the <b>Statement of Need [APP-556]</b> summarises aspects of national energy policy relating to the benefits arising from the Scheme. The key aspects of those policies include that:



ExQ	Respondent	Question	Applicant's Response
		<p>export of electricity from the scheme to the National Electricity Transmission System (NETS) of 500 MW (AC) the import of up to the same figure from the NETS to be stored in the scheme's BESS. Is this agreement for importing up to 500 MW (AC) a nominal figure, or would there be circumstances where you envisage importing from the NETS up to the maximum allowance under the grid connection agreement? Could you explain why importing up to 500 MW (AC) to the BESS might be necessary?</p> <p>Roughly what proportion of the time during operation do you envisage the scheme would be importing from the NETS rather than exporting electricity to the NETS?</p>	<ul style="list-style-type: none"><li>Storage has an important role to play in delivering benefits to the electricity system, in particular "by storing surplus electricity in times of low demand to provide electricity when demand is higher" and by "providing a range of balancing services ... to help operate the system" (NPS EN-1, Paras 3.3.25 – 3.3.31); and</li><li>Co-locating storage with solar maximises the efficiency of land use (NPS EN-3, Para 2.10.10).</li></ul> <p>Table 1 of the Statement of Need sets out Government's capacity ranges for batteries by 2030 and 2035. Section 6.11 of the Statement of Need provides detail on how storage assets support the operation of the renewable technologies they are co-located with schemes by storing energy when it is generated in abundance and releasing it later when it is needed, and by supporting the stability and security of the National Electricity Transmission System to which the Scheme connects. Table 2 of the Statement of Need describes the different ways that co-located storage can support the solar array and explains that many of them require an import as well as an export connection.</p> <p>The Scheme has a connection agreement which provides for both the import and export of up to 500MW from and onto the NETS. All of the infrastructure necessary to deliver the Scheme, including the import and export of up to 500MW of power, has been fully assessed in the Environmental Statement (ES). Importantly, there are no additional significant effects associated with delivering the infrastructure required to facilitate the import of power from the NETS to the BESS.</p> <p>Figure 22 to Figure 26 of the Statement of Need (Section 7.9) illustrate different ways the BESS may support the operation of the solar array under different conditions. Paragraph 7.9.16 of the Statement of Need explains that at certain times, when the BESS is not supporting the operation of the solar array, it may be useful for the BESS to support the national supply and demand balance by importing directly from the grid rather than from the co-located solar. One example of such a time may be overnight when strong winds are generating surplus energy. At these times, the BESS may be needed to import at 500MW. That energy would then be used (i.e. exported) at a subsequent time to augment the energy generated by the solar array to meet demand when the solar array generates less than the grid export capacity.</p> <p>The MW import capacity of a co-located BESS is not constrained by any specific planning policy point. To deliver a BESS with a lower capability for importing from the NETS, when to do so would not reduce any significant effects associated with development but would deliver a functionally less useful scheme, would clearly not be in keeping with current policy and the Government's ambition to deliver a clean power system by 2030. Maximising the efficient use of the proposed BESS and contracted connection capacity requires that the BESS would be able to import up to the full capacity of the connection agreement, if conditions warranted such an action.</p> <p>The BESS is likely to operate in each of the operational modes described below at different times of its operational life.</p>



ExQ	Respondent	Question	Applicant's Response
			<ul style="list-style-type: none"><li>• Store energy generated at the solar array and release it to the grid when demand is higher</li><li>• Import energy from the grid when supply is high and release it back to the grid when demand is higher</li><li>• Support the operation of the grid through providing balancing services to the System Operator (which would involve importing power either from the solar array or the grid, or exporting power to the grid)</li></ul> <p>However, whether and when the scheme would store energy from the NETS or send energy to the NETS, would depend on many factors including national demand, the weather, and the evolving composition of the future GB generation fleet. It is therefore not possible to accurately predict the proportion of time the Scheme would be net importing or exporting (or doing nothing) over its lifetime. However it is highly likely that because the Scheme would consist of a solar array (export only) and an associated storage facility (import and export) the Scheme would export more energy to the NETS over the course of any year than it would import.</p>
Q2.1.5	The Applicant	<b>BESS Emergency Response Plan</b> A request has been made that Grendon Parish Council is consulted on the site-specific Emergency Response Plan for the Green Hill BESS. Please provide your view on that request.	<p>Section 6.1.8 of the <b>Outline Battery Storage Safety Management Plan [REP1-143]</b> stipulates:</p> <p>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 Northamptonshire fire and rescue service 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. The Environment Agency will also be consulted before the detailed battery storage safety management plan, incorporating the emergency response plan, is approved by the relevant planning authority.</p> <p>This is secured through Requirement 6 in Schedule 2 to the <b>Draft DCO Revision C [EX3/GH3.1_C]</b>.</p> <p>The Applicant considers that developing the Emergency Response Plan(s) in consultation with the local fire and rescue services and other local emergency services will ensure robust emergency response planning, risk management planning and ensure all safety materials and equipment is available in an emergency for first responders. The involvement of the Environment Agency provides further technical expertise to ensure the measures in the management plan are appropriate. For that reason, the Applicant does not consider that any specific further consultation with named consultees is required. However, the relevant planning authority is able to consult with additional consultees as it sees fit as part of the discharge process.</p>
Q2.1.6	The Applicant	<b>Layout of the BESS sites</b> In the same way as overplanting is proposed for the areas of solar panels, have the areas denoted on the submitted plans to	<p>Over time, the effectiveness of battery modules to store electrical energy decreases. This does not affect the maximum power (MW) the BESS can operate at (for either import or export). Any reduction in the ability of the</p>



ExQ	Respondent	Question	Applicant's Response
		accommodate BESS at the Green Hill BESS site and at Green Hill C been sized with any thought of 'overplanting' in mind, for example if the effectiveness of the battery modules to store the electrical energy declines over time?	<p>battery modules to store electrical energy would only affect the duration that the batteries can export at the specified power level. If the power (MW) capacity of the BESS was greater than the capacity of the grid connection (allowing for internal electrical losses), a 'portion' of the power capacity of the BESS could never be used. For this reason, the BESS has been proposed with a power capacity of 500MW to match the proposed capacity of the grid connection. Overplanting, in the sense that it may apply to solar facilities, does not apply to BESS in a power (MW) sense.</p> <p>During operation, the amount of energy (MWh) the BESS can store will reduce, meaning that the maximum time for which the BESS could export at full power (MW) would reduce over its lifetime.</p> <p>A Rochdale Envelope approach has been taken to define the extent of the proposed BESS development. Operational factors (including safety parameters) determine the layout of the BESS modules within that envelope.</p> <p>Current technical specifications therefore determine the energy storage capacity of the BESS given the extent of the envelope and any constraints relating to placement of BESS modules within that envelope.</p> <p>The Scheme has been designed to be robust to foreseen degradations in battery energy storage capacity to ensure that an appropriate level of energy storage capacity can be maintained at the Scheme through its operational life.</p> <p>Enhanced storage technologies which are compatible with the parameters and requirements of the DCO, if granted, may be considered during the Scheme's operational phase. Alternatively, if battery module(s) capacity degraded to an unsatisfactory level during its operational phase, a like-for-like replacement, as described in section 4.6 of <b>Environmental Statement Chapter 4 Scheme Description [REP1-031]</b> would return the Scheme's energy storage capacity back to its initial level.</p>
Q2.1.7	The Applicant	<p><b>Possible additional consent requirement for BESS</b></p> <p>In their deadline 1 submission [REP1-186], Easton Maudit Parish Council at paragraph 10 referenced a paper opining that BESS installations require an application for Hazardous Substances Consent. Your deadline 2 response [REP2-048] on pages 169 to 172 does not appear to address that point. However, the ExA is aware that the Consents and Agreements Position Statement [REP1-149] references the possible need to obtain Hazardous Substance Consent. Has that been included to account specifically for the BESS or for some other reason?</p>	<p>Reference to hazardous substances consent has been included in the <b>Consents and Agreements Position Statement [REP1-149]</b> to account for the possibility of this consent being required specifically for the BESS. It is not currently anticipated that such consent will be required. In its response to SGHS-048 in the <b>Applicant's Responses to Written Representations at Deadline 1 [REP2-048]</b>, the Applicant confirms that it is not typical for BESS installations to require hazardous substances consent, however this cannot be confirmed until the detailed design of the BESS has been carried out.</p> <p>The Secretary of State's Decision Letter granting development consent for the Sunnica Solar Project also considered this matter, stating at paragraph 4.59:</p> <p><i>"The Secretary of State ... agrees that there is no requirement to obtain Hazardous Substance Consent in advance of receiving development consent. The Applicant is not requesting that the Secretary of State himself make a decision to deem hazardous substances consent within the DCO. The Secretary of State has been given no reason to believe</i></p>





ExQ	Respondent	Question	Applicant's Response
			<p><i>that Hazardous Substances Consent will not be granted by the HSE at the relevant time.</i></p> <p><i>"The Secretary of State ... is satisfied that the [Battery Fire Safety Management Plan] secured in Requirement 7 of the Order provides a satisfactory mechanism capable of addressing and adequately mitigating all adverse impacts at the detailed design stage."</i></p> <p>The <b>Draft DCO Revision B [EX3/GH3.1_B]</b> does not seek to disapply the hazardous substances regime or to deem a hazardous substances consent. The potential for the Scheme to interact with existing registered major hazards is assessed in <b>ES Chapter 23 Major Accidents and Disasters [APP-060]</b>.</p>
Q2.1.8	The Applicant and National Grid Electricity Distribution (East Midlands) plc (NGED)	<p><b>NGED assets within the order limits</b></p> <p>The ExA welcomes the update in [REP2-048] that discussions are underway between the applicant and NGED on protective provisions.</p> <p>Can you confirm whether the full extent of NGED assets within the order limits now been identified and agreed between the two parties?</p> <p>Based on the answer to the above, might preparation of a Statement of Common Ground by both parties be beneficial, or is it considered that matters can be successfully resolved within the examination through protective provisions?</p>	<p>NGED has provided overlay plans showing the interface between the Order and NGED's apparatus. The Applicant has reviewed the plans and updated the <b>Book of Reference Revision D [EX3/GH4.3_D]</b> where required.</p> <p>The Applicant is confident that matters can be resolved through protective provisions before the end of the examination.</p>
Q2.1.9	North Northamptonshire Council (NNC)	<p><b>Community Benefit Fund</b></p> <p>The ExA notes your request in both your relevant representation [RR-1243] and local impact report [REP1-171] for the Community Benefit Fund to be secured as part of the DCO, as you consider it is required to mitigate the impacts of the development. Could you signpost the ExA to any examples in made DCOs where a Community Benefit Fund, or equivalent, has been secured?</p>	<p>The Applicant notes that this question is not directed at the Applicant. However, a community benefit fund cannot be taken into account in the planning balance and it would therefore not be appropriate to secure it as part of the DCO process.</p>
Q2.1.10	The Applicant	<p><b>Decommissioning and restoration</b></p> <p>The ExA notes the response that you provided to NNC on this matter (ref.NNC-085 of [REP1-161]), but you will be aware from various other representations from IPs that there is clearly a concern to ensure that decommissioning and restoration of the sites is fully secured. The DCO contains requirement 21 and we note your views regarding it complying with the relevant paragraphs of NPS EN-3 and the precedent from previous decisions. However, 60 years is a significant period of time for the operational phase and under article 37 the benefit of the Order could be transferred to another party (albeit that all of the provisions of the Order, including requirement 21 will also transfer). Is there more that could be done to provide absolute certainty to IPs that decommissioning will be successfully carried out, as restoration bonds are commonplace in the minerals industry where sites are worked over similarly long timescales?</p>	<p>The Applicant recognises the importance of ensuring that decommissioning and restoration are fully secured. Whilst restoration bonds are common for minerals planning permissions, the inclusion of a DCO requirement or planning obligation to provide decommissioning security is not typical for onshore energy generation DCOs. This includes solar projects with an operational period of 60 years such as West Burton Solar Project, Mallard Pass Solar Project, Tillbridge Solar Project, Cottam Solar Project and Gate Burton Energy Park.</p> <p>In the decision for the Oaklands Farm Solar Park, the Secretary of State considered that, with the decommissioning Requirement in place, there was no need for further controls. This is set out in paragraphs 4.21 to 4.45 of the Secretary of State's Decision Letter for that project.</p> <p>Non-compliance with any of the requirements in the Order would constitute a criminal offence and could result in an unlimited fine by way of penalty if convicted on indictment. This provides a robust mechanism</p>



ExQ	Respondent	Question	Applicant's Response
			<p>for ensuring decommissioning and restoration are successfully carried out.</p> <p>Additionally, Island Green Power, the Applicant's parent company, always seeks to enter into voluntary agreements with landowners where possible. As such, Option Agreements have been entered into with the landowners to lease the land required for the Sites. Taking a lease means that the freehold ownership remains with the landowner. As per the Requirements, at the end of the operational life of the Scheme, the solar panels and batteries will be removed, the land will be restored, and the lease will end. The landowner will then be able to use the land for agricultural purposes or return back to its original state. The leases for the Site areas require the Applicant to put in place a form of security to ensure that the decommissioning obligations in the leases are complied with. The exact terms of the leases are commercially confidential.</p> <p>Finally, the decommissioning of mineral developments is distinct from solar projects, typically requiring long-term remediation and management of the land following the cessation of mining activity. By comparison, once a solar project ceases to operate commercially, decommissioning involves the removal of the solar infrastructure with no ongoing obligations to be secured. The land is returned to the landowners and able to immediately be returned to prior agricultural use.</p> <p>Mineral developments are also not consented as nationally significant infrastructure projects, meaning that they engage different enforcement mechanisms. Accordingly, it is not considered that they represent a relevant or meaningful comparison, and that the 60-year consented solar DCOs, listed above, should be referred to instead.</p>



## 2.2 Design, parameters and other details of the proposed development

ExQ	Respondent	Question	Applicant's Response
Q2.2.1	Trescella Elderton and Ben Elderton (t/a FC & CC Elderton)	<b>Compound location</b> Following the applicant's response to your written representations (specifically point 3.7) in section ELD-004 of [REP2-048], does this address your concerns about the location and size of the compound?	The Applicant notes that this question is not directed at the Applicant.



## **2.3 The Environmental Statement (general)**

2.3.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

## **2.4 Need**

2.4.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

## **2.5 Site selection and alternatives**

2.5.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

## **2.6 Air quality and emissions**

2.6.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.





## 2.7 Biodiversity, ecology and natural environment

ExQ	Respondent	Question	Applicant's Response
Q2.7.1	The Applicant	<b>Protected species licence</b> Please provide an update on the great crested newt District Licence which is being pursued with NatureSpace.	The Applicant is working through the assessment of impacts with NatureSpace, which underpins the great crested newt District Licence. This workstream has been on hold pending the finalisation of minor design alterations (as submitted in the Change application), and will be progressed now that the Change application has been accepted. The draft licence certificate will be submitted into Examination once it has been issued by NatureSpace.
Q2.7.2	The Applicant	<b>Extent of ancient woodland buffers</b> The Schedule of Protective Ecological Buffers (APP-095) does not depict ecological buffers adjacent to the following areas of ancient woodland: <ul style="list-style-type: none"><li>• The western edge of Sywell Wood (Cable Route Corridor near Site C)</li><li>• The eastern edge of Horn Wood (Site F) and</li><li>• Barslay Spinney (Cable Route Corridor to the west of Site G).</li></ul> Please explain why these are absent and, consequently, whether the Change Request reflects the full extent of changes which may be sought in this regard.	The figures in <b>Environmental Statement Appendix 9.12 Schedule of Protective Ecological Buffers [APP-095]</b> only depict buffers within the solar sites (Green Hill A-G) and Green Hill BESS, and do not depict any protective buffers within other parts of the Order Limits, such as the Cable Route Corridor. Although the presence of valuable habitats along the Cable Route Corridor will be taken into account during the design and installation of the Cable Route, the impacts will be temporary in nature, and therefore the buffer widths implemented into the design of the Sites may not necessarily be implemented in the Cable Route Corridor. Protective measures specific to the Cable Route Corridor which will be implemented during cable route installation are detailed in <i>'Method Statement 6: Temporary Habitat Removal and Reinstatement (Cable Route Corridor) - including Avoidance of Impacts on Protected Species'</i> of the <b>Outline Ecological Protection and Mitigation Strategy (Revision A) [REP1-140]</b>  With regards to the specific areas highlighted by the Examining Authority: <ul style="list-style-type: none"><li>• A buffer is not present on the western edge of Sywell Wood as this area is within the Cable Route Corridor, outside of the Green Hill C Site.</li><li>• A buffer is not present on the eastern edge of Horn Wood as this area pertains to the access route from the A509, and is outside of the Green Hill F Site.</li><li>• A 30m buffer is present around Barslay Spinney to the extent that this buffer interacts with the boundary of Green Hill G. This buffer almost entirely overlaps with the standard 15m buffer from the hedgerow on the western boundary of Green Hill G.</li></ul>
Q2.7.3	The Applicant	<b>Clarification of plans and extent of Change Request</b> The Change Request includes realignment of the track next to Horn Wood to create an access which would lie outside the ancient woodland buffer zone for use during the construction, replacement and decommissioning phases. Landscape and Ecology Mitigation Plan F Sheet 3 Revision B [CR1-036 and CR1-037] still shows an access track within the buffer to the east and south-east of Horn Wood, as well as a track outside the buffer. The Works Plan [CR1-006] depicts an existing track within the buffer at a similar location.  Furthermore, the Works Plan depicts an existing track within the buffer at the southwestern corner of Threeshire Wood at Sheet 18. The Landscape and Ecology Mitigation Plan G [APP-219] depicts an access track within the buffer at a similar location, but with a greater extent.  Whilst the Landscape and Ecology Mitigation Plans are indicative documents, are the above elements intended to depict existing tracks within buffers on which no works would be carried out? If this is the case, has consideration been given to whether any changes may be sought in respect of the Threeshire Wood buffer, where the Landscape and Ecology Mitigation Plan shows an increase in the extent of the track?	The proposed operational access for Green Hill F follows the route of an existing farm track from the A509 to the solar panel area.  The existing access track, as shown on Landscape and Ecology Mitigation Plan F Sheet 3 Revision B, will be utilised during the operational maintenance phase only. Where access tracks are required within Veteran Tree/Ancient Woodland Buffer Zones for operation, these access tracks will be constructed using a 'no-dig' solution, and all excavation within these buffer zones will be avoided, as secured Table 3.13 in the <b>Outline Construction Environmental Management Plan [REP1-131]</b> .  For the construction, replacement activities, and decommissioning phases, a temporary access will be constructed further east, outside the buffer zone for Horn Wood. This temporary access will be located within the area identified as Work No. 8(b) on the Works Plan.  The Applicant has committed to using an alternative access which will avoid the ancient woodland buffer zone around Threeshires Wood. This access will be created further south of the woodland, through the hedgerow located along the western boundary of Field GF9. This track will be used for construction, replacement and decommissioning.
Q2.7.4	The Applicant	<b>Clarification of Landscape and Ecology Mitigation Plan</b>	The green striped marking depicts the airfield designation for Sywell Aerodrome and is not showing a proposed mitigation feature. This hatching layer came from a third party base mapping that has been used in the production of the plan. For the sake of clarity, the Applicant has updated



ExQ	Respondent	Question	Applicant's Response
		Please confirm what the vertical green striped marking covering the Cable Route Corridor to the west of Sywell Wood on the Landscape and Ecology Mitigation Plan C and D Option A (Revision A) [REP1-111] depicts, as it is not explained in the key.	the <b>Landscape and Ecology Mitigation Plan C and D Option A Revision B [EX3/GH6.4.4.13.1_B]</b> to include this hatching within the key.
Q2.7.5	The Applicant	<b>Hedgerow removal timings</b> Paragraph 6.2.2 of the Outline Ecological Protection and Mitigation Strategy (Revision A) [REP1-140] states that habitat clearance including some hedgerow would be undertaken between March and October inclusive. However, paragraph 6.4.1 states that clearance of hedgerow is not to be undertaken between March and August inclusive due to the risk of unlawful impacts on nesting birds. Please clarify whether these statements require revision.	The annual breeding and hibernation cycles of various species groups do result in varying ecological constraints throughout the year. This is unavoidable, and it is therefore the intention of the <b>Outline Ecological Protection and Mitigation Strategy Revision A [REP1-139]</b> (OEPMS) to minimise the impacts of construction work through the implementation of a precautionary approach to habitat removal work. The general approach to be applied is outlined in Section 6.2 of the OEPMS, and comprises the avoidance of the hibernation season for reptiles and amphibians wherever practicable to avoid unlawful harm to these species. However, acknowledging that circumstances may dictate that clearance works need to be conducted during this period, habitat clearance will be conducted under an ecological watching brief (i.e. supervised by suitably experienced and/or licensed ecologists) to ensure species such as nesting birds, reptiles, amphibians and small mammals are not harmed. Full details are provided in the <b>OEPMS [REP1-139]</b> .
Q2.7.6	Natural England	<b>Consultation on document and plans to be certified</b> The draft development consent order [CR1-014] currently provides for the statutory nature conservation body to be consulted on the final landscape and ecological management plan, ecological protection and mitigation strategy and biodiversity net gain strategy. Would Natural England wish to be consulted on any of the other documents and plans to be certified, as set out in Schedule 13, Part 1 of the draft order?	The Applicant notes that this question is not directed at the Applicant.
Q2.7.7	Stop Green Hill Solar	<b>Llanwern solar scheme</b> Please outline any areas of similarity and difference between the Llanwern scheme discussed in the "Notes on Ecology aspects of Green Hill solar plans" document [REP1-218] and the proposed development.	The Applicant notes that this question is not directed at the Applicant.
Q2.7.8	Stop Green Hill Solar	<b>Bat Study methodology</b> Please provide any comments you wish to make in response to the applicant's comments on the methodology of the bat populations study (at SGHS-005, Pages 232-3 of the applicant's Responses to Written Representations at Deadline 1 [REP2-048])?	The Applicant notes that this question is not directed at the Applicant.

## 2.8 Habitats Regulations Assessment

ExQ	Respondent	Question	Applicant's Response
Q2.8.1	Natural England	<b>Disturbance to species outside the Special Protection Area</b> Does the applicant's response to Issue reference NE-004 (Visual and noise disturbance) of the applicant's Responses to Deadline 1 Submissions document [REP2-050] adequately address Natural England's concerns in this regard? If not, please outline how the concerns could be addressed.	The Applicant notes that this question is not directed at the Applicant.
Q2.8.2	Natural England	<b>Functionally Linked Land Methodology</b> Although the use of a "land parcel scale" in determining FLL was approved by Natural England, the applicant's response at NE-003 of its Responses to Written Representations at Deadline 1 [REP2-048] sets out that a "land parcel scale" was not used in determining FLL. Does this affect Natural England's conclusions on the approach to determining FLL?	The Applicant notes that this question is not directed at the Applicant.



ExQ	Respondent	Question	Applicant's Response
Q2.8.3	Natural England The Applicant	<b>Special Protection Area qualifying features impact pathways</b> The updated HRA [REP1-153] sets out qualifying features of the Upper Nene Valley Gravel Pits Special Protection Area at paragraph 5.2.4. Para 5.2.6 states that "the site qualifies under article 4.2 of the Birds Directive as it is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar Convention) in any season. In the non-breeding season, the area regularly supports 23,821 individual waterbirds (5 year peak mean 1999/2000-2003/04), including wigeon, gadwall, mallard, shoveler, pochard, tufted duck, great crested grebe, cormorant, bittern, golden plover, lapwing and coot". However, Table 2 (Summary of Screening Outcomes in Isolation and in Combination) (Page 32) lists only the following qualifying features and impact pathways for them: bittern, golden plover, gadwall, mute swan and waterbird. Should all the species listed at paragraph 5.2.6 be included in Table 2?	Each of the individual qualifying features for the designated sites are assessed. Where a particular species' population is a qualifying feature (bittern, golden plover, gadwall and mute swan), this is assessed in its own right. Where species form part of the waterbird assemblage but do not qualify in their own right (wigeon, mallard, shoveler, pochard, tufted duck, great crested grebe, cormorant, lapwing and coot), these are assessed collectively, rather than individually.
Q2.8.4	Natural England	<b>Ramsar site conservation objectives</b> To clarify question 9.0.10 of the Examining Authority's Written Questions 1 [PD-007], please confirm whether the conservation objectives for the Special Protection Area which are set out in Natural England's response to the question (in its Responses to ExQ1 document [REP1-181]) also apply to the Ramsar site.	The Applicant notes that this question is not directed at the Applicant.

## 2.9 Compulsory acquisition, temporary possession and other land or rights considerations

2.9.1 Questions on this topic will be posed during the forthcoming compulsory acquisition hearing.



## 2.10 The draft Development Consent Order (DCO)

ExQ	Respondent	Question	Applicant's Response
Q2.10.1	The Applicant	<b>References to Milton Keynes</b> The dDCO refers to both the Borough of Milton Keynes and the District of Milton Keynes. Please check these terms for accuracy.	The Applicant has amended references in the <b>Draft DCO Revision C [EX3/GH3.1_C]</b> to the District of Milton Keynes to the Borough of Milton Keynes.
Q2.10.2	NNC	<b>Noise assessment for the BESS</b> Noting the applicant's response on p.121 of its Responses to Local Impact Reports [REP2-049] to paragraphs 8.264 to 8.266 of your local impact report stating that requirement 17 in schedule 2 to the draft DCO requires an operational noise management plan confirming how the design of the BESS has incorporated the operational noise mitigation measures set out in the oOEMP [REP1-133], to be approved by the relevant LPA prior to the commencement of the BESS, does this address your recommendation for submission of a noise assessment for the BESS?	The Applicant notes that this question is not directed at the Applicant.

2.10.1 Further questions on this topic will be posed during the forthcoming issue specific hearing 3 on the Draft DCO.





## 2.11 Historic environment

ExQ	Respondent	Question	Applicant's Response
Q2.11.1	Historic England (HE)	<b>Setting of designated heritage assets</b> As part of ExQ1 the ExA asked the following question of HE: In relation to the comments in your relevant representation [RR-1228] regarding the settlements of Mears Ashby, Walgrave and Old, can you clarify that the proposed mitigation has satisfied your earlier concerns, or is there more to be done? As we did not receive representations from HE at D1 or D2, could you provide us with an answer to the above question by D3.	The Applicant notes that this question is not directed at the Applicant.
Q2.11.2	Historic England	<b>Registered Park and Garden of Castle Ashby</b> As part of ExQ1 the ExA asked the following question of HE: Your RR [RR-1228] in respect of the proximity of the Grade I Registered Park and Garden of Castle Ashby to the proposed development notes the topography and proposed screening would reduce the setting impact. Does this alleviate your concerns regarding the impact on setting, or is there more you expect from the applicant? As we did not receive representations from HE at D1 or D2, could you provide us with an answer to the above question by D3.	The Applicant notes that this question is not directed at the Applicant.
Q2.11.3	WNC (and any other IP)	<b>Archaeological assessment</b> Do you have any comments to make on the additional geophysical surveys [REP1-059] to [REP1-077] that were submitted by the applicant at deadline 1?	The Applicant notes that this question is not directed at the Applicant.
Q2.11.4	NNC	<b>Non-designated (built) heritage assets within/outside the Order Limits</b> Noting the applicant's response on p.89 of its Responses to Local Impact Reports [REP2-049] to paragraph 8.141 of your local impact report stating that the Order Limits runs adjacent to the property boundary of the three non-designated assets listed but does not include the buildings, does this address the previous disagreement on this point? If you still consider that these three non-designated heritage assets fall within the Order Limits could you please provide some evidence into the examination to back up your argument.	The Applicant notes that this question is not directed at the Applicant.



## **2.12 Land use, agriculture and soils**

2.12.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.



## 2.13 Landscape and visual, including glint and glare

ExQ	Respondent	Question	Applicant's Response
Q2.13.1	The Applicant	<b>Progress on matters under discussion</b> In the draft Statements of Common Ground with NNC [REP2-056], WNC [REP2-057] and MKCC [REP2-058] there are a number of Landscape and Visual Impacts which remain under discussion. Please could an update on the progress of any of these be provided.	The Applicant is seeking to progress discussions to advance the draft SoCG with <b>NNC [REP2-056], WNC [REP2-057] and MKCC [REP2-058]</b> .
Q2.13.2	The Applicant	<b>Mitigation planting</b> NNC in their LIR para 8.40 refer to the landscape and visual mitigation having been conflated and too much weight applied to the benefits of this mitigation over and above its role of screening the proposed development? In your response ref NNC 8.40-8.41 [REP2-049] you note these comments however is there any further response you wish to make to NNC's concern?	<p>The Applicant has reviewed the <b>North Northamptonshire Council Local Impact Report (LIR) [REP1-171]</b> para 8.40 and respectfully disagrees with the ExA that NNC have suggested that the role of the landscape and visual mitigation has been conflated or that too much weight has been applied to the benefits of this mitigation over and above its role of screening the proposed development within the <b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b>.</p> <p>NCC have referenced LITGN-2024-01 Notes and Clarifications on Aspects of GLVIA3 (August 2024), and although not directly referenced, it is assumed that this is in reference to Issue / Question 4 (3):</p> <p><i>"Distinguishing between landscape and visual mitigation:</i></p> <p><i>Care should be taken to ensure landscape and visual mitigation is not confused. For example, it does not necessarily follow that screening a development from view would reduce its landscape effects, such as those on landscape character."</i></p> <p>Within their LIR at para 8.40, NNC make a similar statement, but do not suggest that the <b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b> has in fact conflated or confused this issue, only that care should be taken as to not do so when undertaking LVIA:</p> <p><i>"...care should be taken to ensure that landscape and visual mitigation are not conflated. Screening the development from view may reduce its visual effects but does not necessarily lessen its landscape effects, such as those on landscape character."</i></p> <p>Following this, within their LIR at para 8.40, NNC make the following statement:</p> <p><i>"In addition, it is important that the terms mitigation and enhancement are used correctly. Mitigation should focus on measures that prevent, reduce or where possible offset significant adverse effects, whereas enhancement seeks to improve landscape or visual amenity beyond the baseline condition."</i></p> <p>Again, NNC have not suggested that in their opinion the LVIA has incorrectly used the terms <i>mitigation</i> or <i>enhancement</i>, just that it is important when undertaking <b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b> to ensure that they are used correctly. Whilst not referenced directly, given the similarity in language, this is believed to be in reference to LITGN-2024-01 Notes and Clarifications on Aspects of GLVIA3 (August 2024) Issue / Question 4 (4):</p> <p><i>"Distinguishing between mitigation and enhancement:</i></p> <p><i>Care should also be taken to ensure that the terms 'mitigation' and 'enhancement' are correctly used. Mitigation is focused on measures to prevent, reduce and where possible offset any significant adverse effects while enhancement seeks to improve landscape</i></p>



ExQ	Respondent	Question	Applicant's Response
			<p><i>and/or visual amenity beyond its baseline condition (see GLVIA3 paragraphs 3.37 to 3.39)."</i></p> <p>NNC LIR <b>[REP1 -171]</b> para 8.41 recognises that the proposed planting and habitat creation would deliver an enhancement relative to the existing conditions and goes on to affirm that the primary function of the proposed planting and habitat creation is intended to reduce the degree of adverse change arising from the development. Whilst this is somewhat correct, the proposed planning and habitat creation has been carefully designed to ensure compatibility with the existing character of the landscape to allow the Scheme to build upon and to not be incongruous.</p> <p>For example, the planting proposed for the landscape scheme is for locally prominent native species rather than the use of extensive conifers. Both would serve the purpose of providing screening to the proposed infrastructure, and thereby providing mitigation of visual effects, however conifer use would in itself be seen as contrary to the existing fabric and character of the landscape, and its use, with or without the proposed infrastructure could be seen as detrimental to landscape character.</p> <p>The NNC LIR <b>[REP1-171]</b> states that the perceptual qualities and sense of place associated with the open, tranquil and rural character of the landscape would remain altered for the duration of the operational period of the Scheme.</p> <p>The findings of the LVIA concur with that of the NNC LIR <b>[REP1-171]</b> in that <b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b> recognises that there would be an appreciation of the Scheme within its immediate surroundings which would be notably different from the character of the surrounding arable countryside.</p> <p>The NNC LIR <b>[REP1-171]</b> recognises that the proposed landscape scheme (once established) would help integrate the development into the receiving landscape, however despite this, the underlying change from a traditional agricultural rural landscape to one more defined by infrastructure would persist, continuing to influence how the area is perceived and experienced.</p> <p><b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b> acknowledges that locally prior to the establishment of the Embedded Mitigation, there would be an immediate change to the character of the individual Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, these effects would be limited to the site itself and its immediate setting.</p> <p>The Scheme provides reinforcement to the host landscape fabric of the site, strengthening and reinforcing existing landscape elements in accordance with LCA aims and guidelines. As new vegetation matures it would begin to provide enclosure to the individual Sites, screening and providing containment to the Scheme allowing it to become more absorbed into the receiving landscape. However, given the scale of the proposals, there would be an appreciation of the Scheme within its immediate surroundings which would be notably different from the character of the surrounding arable countryside.</p> <p>Where visible from within the wider landscape, the new planting would reinforce the well layered landscape with a backdrop of wooded vegetation in places on the horizon. Both new and existing vegetation would have established and begun to mature, creating a much stronger structure to the landscape locally.</p>





ExQ	Respondent	Question	Applicant's Response
Q2.13.3	NNC	<b>Mitigation planting</b> In relation to paragraph 8.43 of your Local Impact Report [REP1-171], are there any specific areas where the proposed mitigation hedgerow planting of approximately 4 – 4.5m height would result in unacceptable levels of enclosure or impacts on existing visual connections/rural openness?	The Applicant notes that this question is not directed at the Applicant.
Q2.13.4	NNC	<b>Cumulative impacts</b> The applicant has responded to your concerns relating to cumulative impacts and viewing the scheme as a single, cohesive development in NNC 8.45 [REP2-049]. Does this address or alter your concerns in this regard?	The Applicant notes that this question is not directed at the Applicant.
Q2.13.5	MKCC, The Applicant, Lavendon PC	<b>Fields GF9 and GF13</b> Noting the submissions in relation to fields GF9 and GF13, is there an update regarding any progress on this issue or any updates as to the status of the emerging policies of the MKCP or the proposed SLA and the weight that should be given to these?	<p>It is acknowledged by Officers at MKCC that Site G, including fields GF9 and GF13 are located in an area identified as a suitable location for solar development, set out in the emerging Milton Keynes City Plan 2050 (MKCP) Policy GS7.</p> <p>The MKCP is currently at the Regulation 19 Consultation stage where emerging policies carry minimum weight. As set out within the <b>Milton Keynes City Council Local Impact Report [REP1-169]</b>, it is acknowledged that the Examining Authority may need to seek a view from the Council as to the degree of weight which should be afforded to these policies, at the time of the decision. The Applicant will be submitting a representation to the Regulation 19 Consultation specifically on the inclusion of fields GF9 and GF13 into the extended Special Landscape Area.</p> <p>The Applicant did provide an update to the <b>Planning Statement [REP2-043]</b> and the <b>Policy Compliance Document [REP2-045]</b> at Deadline 2 which reflects that the emerging plan has moved to Regulation 19 Consultation.</p>
Q2.13.6	The Applicant and MKCC	<b>Additional viewpoints</b> It is noted in the applicant's response MCC-012 [REP2-050] and MKCC's response Q16.0.3 [REP1-0170] that discussions are being held with MKCC to agree additional viewpoint locations with a view to submitting these at either D4 or D5. Are there any updates on the progress of these discussions?	<p>Email correspondence was sent to MKCC on the 25<sup>th</sup> November 2025 confirming that in response to MKCC-012 in <b>'The Applicant's Responses to Deadline 1 Submissions' [REP2-050]</b>, the Applicant will undertake the additional viewpoints and photomontages as requested.</p> <p>The Applicant received the locations of the desired additional viewpoints on 8<sup>th</sup> December 2025 and photography is scheduled for the new year to submit the updated photomontages by Deadline 4 or 5.</p> <p>MKCC advised in its <b>Response to ExQ1 [REP1-170]</b>, question 16.0.3, the location of additional viewpoints and photomontages. Email correspondence was sent to MKCC on the 25<sup>th</sup> November 2025 confirming, as summarised in reference MKCC-012 within the <b>Applicant's Responses to Deadline 1 Submissions [REP2-050]</b>, that the Applicant will undertake winter photography of the additional viewpoints requested and create the photomontages as requested.</p> <p>The Applicant received a response from MKCC confirming the precise locations of the desired additional viewpoints on Monday the 8<sup>th</sup> December. Photography is scheduled for completion in December, and the Applicant aims to submit the photomontages by Deadline 4 or 5.</p>
Q2.13.7	The Applicant, Local Planning Authorities and Stop Green Hill Solar	<b>Local character variations</b> Paragraph S.13 of Stop Green Hill Solar's Landscape and Related Matters Statement [REP-194] and [REP1-195] and the Local Impact Reports [REP1-169, REP1-171 and REP1-175] mention the need to consider the local variations in landscape character given the site is over such a wide area. Do the applicant, the Councils and Stop Green Hill Solar	In its consideration of the Landscape Value, Susceptibility and Sensitivity of the receiving landscape, <b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b> has not applied a blanket weighting across all of the individual sites (development parcels). The <b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b> has undertaken a Site by Site and by Study Area assessment of Sensitivity and Magnitude of Change, which combined give the Significance of Effects for each of the individual Sites.



ExQ	Respondent	Question	Applicant's Response
		consider that a suitable level of consideration has been given to local landscape character baseline variations on which the assessments have been based upon?	<p>Section 8.6 of the <b>ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]</b> sets out the character of the receiving landscape for both the Scheme and of the individual Sites. Appendix 8.3.2.2 contained within <b>Appendix 8.3: ES LVIA Assessment Sheets Revision A [REP1-042]</b> includes baseline descriptions of Landscape Character for each of the individual Sites within each of the separate Study Areas, as well as detailed descriptions of Landscape Value and Susceptibility.</p> <p>This approach has allowed for the individual characteristics and local variation that are present within the landscape in and around each of the individual Sites to be fully accounted for within the assessment.</p>
Q2.13.8	Stop Green Hill Solar	<p><b>LVIA methodology</b></p> <p>The Councils appear to be content with the methodology used for the LVIA and landscape assessments and are satisfied that they follow GLVIA3. However, in SGHS's submission REP1-194 and REP1-195, it is considered that the applicant's LVIA method and process have errors and flawed assumptions have been made (paragraph S.11 onwards). Does the applicant's response to these concerns in SGHS-28 [REP2-048] satisfactorily address these issues?</p>	The Applicant notes that this question is not directed at the Applicant.
Q2.13.9	The Applicant	<p><b>Viewpoint and photomontage locations – Lamport Hall</b></p> <p>CPRE Northamptonshire, in their response to ExQ1 Q16.0.3 [REP2-069] have raised concerns with VP1 not being representative of the views experienced by visitors to Lamport Hall. Is the applicant intending to amend or provide an additional viewpoint to address this?</p>	<p>Lamport Hall is located approximately 3.25km west of Green Hill A, and as such falls outside of the agreed 2km visual Study Area. Lamport Hall is located within the Outer 5km Study Area which focuses on impacts upon landscape receptors only, with all visual receptors beyond the Wider 2km Study Area including Lamport Hall scoped out of the LVIA.</p> <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. 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.</p> <p>Positions of viewpoint photography were agreed in consultation with Landscape Officers from North Northamptonshire 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 process. 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. For the purposes of <b>ES Chapter 8 Landscape and Visual Impact [APP-045]</b> and in keeping with the approach set out 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.</p> <p>As detailed in Appendix 1 of <b>Appendix 12.1: Heritage Statement [APP-110 to APP-120]</b> the Grade I Listed Lamport Hall was scoped out of the heritage assessment as the asset does not have any visual or historic relationship with land within the Scheme. <b>Appendix 1 of ES Appendix 12.1 Heritage Statement [APP-110 to APP-120]</b> was used during consultation and assets scoped out of assessment are considered to be agreed with the</p>



ExQ	Respondent	Question	Applicant's Response
			Historic England and the Local Planning Authorities (see <b>ES Appendix 12.8 Consultation Tables [APP-148]</b> ).
Q2.13.10	WNC	<b>Effect on local roads</b> In paragraph 4.167 - 4.169 of the LIR, reference is made to local roads having been omitted from the glint and glare assessments. The applicant has submitted a further Glint and Glare Technical Note [REP2-054], does this document address these omissions or do you consider further local roads should be included in the assessments?	The Applicant notes that this question is not directed at the Applicant.

## 2.14 Noise and vibration

2.14.1 There are no questions on this topic at this time. Questions may be asked in future hearings or in further written questions.

## 2.15 Socio-economic effects

ExQ	Respondent	Question	Applicant's Response
Q2.15.1	Wellingborough Town Council	<b>Waendel Walk</b> Please confirm whether you are satisfied with the updated proposed mitigation measures in respect of the International Waendel Walk Weekend, following engagement with the applicant on the issue.	The Applicant notes that this question is not directed at the Applicant.



## 2.16 Transportation and traffic

ExQ	Respondent	Question	Applicant's Response
Q2.16.1	The Applicant	<b>National Highways</b> Please provide an update on discussions with National Highways.	<p>The Applicant has had ongoing discussions with National Highways and all transport elements are now agreed as set out in the latest Statement of Common Ground [EX3/GH8.3.7_A].</p> <p>The matters that are still under discussion relate to the form of protective provisions street works and powers to be included in the DCO, which are being progressed. The Applicant's legal advisors had a virtual meeting with NH on 16 December 2025 and there is an action on the Applicant to provide NH with an updated version of the protective provisions prior to Deadline 4. Any agreed amendments to the draft DCO will be included in the version submitted at Deadline 4.</p>
Q2.16.2	The Applicant	<b>Construction parking provision</b> Host authorities raise concerns that the level of shuttlebus use may be overestimated due to a lack of local hotel availability, increasing the need for parking within the proposed development. It is suggested that heavy goods vehicles may arrive ahead of schedule, potentially increasing congestion. Parking provision has not yet been defined. How would "overspill" parking on the highway be avoided in light of the shuttlebus concerns, and how would sufficient provision for HGV parking/holding areas be made within the proposed development?	<p>Please refer to the Applicant's responses to 'MKC – 4.43 to 4.45' and 'WNC 4.106 to 4.119' in <b>Applicant Responses to Local Impact Reports [REP2-049]</b> with regard to the level of shuttle buses and hotel availability within the area. In addition, further information on the shuttle bus strategy and supporting evidence is provided in the <b>Shuttle Bus Service Supporting Document [EX3/GH8.2.6]</b> submitted at Deadline 3.</p> <p>Please refer to the response to 'WNC 4.127 to 4.131' in <b>Applicant Responses to Local Impact Reports [REP2-049]</b> with regard to the management of HGV movements. Given the level of HGVs and the proposed management set out in the <b>Outline Construction Traffic Management Plan Revision B [EX3/GH7.9_B]</b>, HGV holding areas are not considered to be required.</p> <p>All parking will be required to take place off the public highway, and is secured in the <b>Outline Construction Traffic Management Plan Revision B [EX3/GH7.9_B]</b>. Requirement 4 of the <b>draft DCO [EX3/GH3.1_B]</b> requires a Community Liaison Group to be established and to meet for the duration of the construction period. Any issues with compliance with the Construction Traffic Management Plan will be able to be discussed with the Community Liaison Group and rectified with the contractor(s) as appropriate.</p> <p>Parking provision will be set out in the Construction Worker Travel Plan, which is a requirement of the <b>Outline Construction Traffic Management Plan Revision B [EX3/GH7.9_B]</b>. Prior to commencement of construction, the local authorities will be required to approve the Construction Worker Travel Plan, which will include worker mode share targets and parking provision across the project.</p>
Q2.16.3	The Applicant	<b>Travel arrangements</b> Would staff and visitors travel to/from the sites once they had parked at one of the three compounds, or would parking be available within each of the sites, including the cable route corridor? If the former is envisaged, would people travel between the compound and the site they would be attending by shuttlebus?	<p>Construction compounds with parking are provided within each Green Hill Site and workers will travel directly to each Green Hill Site by car or shuttle bus. Areas of Work No. 7 (temporary construction and decommissioning laydown areas) within the Sites provide for these compound areas.</p> <p>Three individual construction compounds are provided for the cable route corridor as shown on <b>Figure 13.2 [APP-433]</b>. Workers associated with the cable route corridor will need to travel to their assigned compound locations before travelling by shuttle bus to areas of the cable route corridor that are under construction. This strategy is included within the assessment set out in <b>Shuttle Bus Service Supporting Document [EX3/GH8.2.6]</b>.</p>
Q2.16.4	The Applicant	<b>Access to Construction Compound 4</b> Construction Compound 4 would be accessed via an internal haul route from Station Road, Grendon. Horizontal directional drilling (HDD) would be used in the vicinity of the Station Road terminus of the haul route in respect of Crossings HV_SP8760_013 and HV_SP8760_014, as shown in the Crossing Schedule [APP-562]. The applicant's response to Question Q20.0.3 of the Examining Authority's First Written Questions [REP1-163] states	<p>As set out in the response to Q20.0.3 of the <b>Examining Authority's First Written Questions [REP1-163]</b>, where HDD is used, this creates a 'gap' in the cable corridor haul route that sits above ground which prevents the use of internal construction haul routes to inter-connect between sites.</p> <p>With regard to Construction Compound 4, the HDD is required under Station Road due to the need to cross under a statutory main river on the north side of Station Road, as set out for Crossings HV_SP8760_013 and HV_SP8760_014 in the <b>Crossing Schedule [APP-562]</b>. It is</p>





ExQ	Respondent	Question	Applicant's Response
		that where HDD is used, internal haul routes cannot be used to inter-connect between sites. Can the applicant explain how a haul route would be made available from Station Road.	the statutory main river that prevents the inter-connection of haul routes north and south of Station Road for construction traffic movements. It is proposed for construction traffic movements to route via Station Road to access CR18, and then route south along the internal haul route south from Station Road to access the compound.
Q2.16.5	The Applicant	<b>Access D-1 (Highfield Road)</b> The applicant's response to Q20.0.12 [REP1-163] sets out that Access D-1 has been identified for use during the construction phase and during replacement periods. The access would lie close to the Sywell Road junction with Highfield Road. A representation [REP1-207] has been made regarding the safety of this access. What assessments of the highway safety implications of its use have been made?	The use of Access D-1 would only be for the construction and replacement phases as set out in <b>Table 13.10 of Chapter 13 Transport and Access (Revision A) [REP2-003]</b> . Through recent discussions with NNC, updates have been made to the access design of Access D-1 to bring it further away from the junction with Sywell Road. This will enable HGVs to turn into Highfield Road from Sywell Road before turning into Access D-1. Likewise, any HGVs exiting Access D-1 would now be able to turn left out of the access onto Highfield Road before turning onto Sywell Road. <b>Drawing Number 23061-KMC-XX-AD1-DR-CH-0001 (Rev D)</b> has been included in the updated <b>Appendix 13.2 of Transport Assessment (Part 1) (Revision A) [EX3/GH6.3.13.2_A]</b> . These changes address the concerns of the highway authority and the visibility splays and swept path analysis included on the access drawing demonstrate the safe operation of the proposed access.
Q2.16.6	The Applicant	<b>Notice of public right of way closures</b> West Northamptonshire Council's Local Impact Report requests that notice is given to the public of any temporary closures of public rights of way. Please confirm whether any updates to the Outline Public Rights of Way and Permissive Paths Management Plan (Revision A) [REP1-147] in this respect are considered appropriate.	The <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision B) [EX3/GH7.10_B]</b> has been updated to set out how the public will be informed of any temporary diversions or closures of PRoW.
Q2.16.7	The Applicant	<b>Consideration of management measures to prevent diversions or closures of public rights of way</b> The Outline Public Rights of Way and Permissive Paths Management Plan Revision A [REP1-147] sets out (at 3.2) management measures for the tabulated public rights of way which would need to be crossed during construction or which would require management associated with the Cable Route Corridor. However, any management measures which would be considered before closures in respect of several other public rights of way which may be subject to temporary closure, such as Footpath TF/004 between Grendon and Castle Ashby, are not set out. Given the value placed on countryside access by local communities, can the applicant explain whether consideration of such management measures in preference to diversions or closures would be given in respect of all affected public rights of way?	The <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision B) [EX3/GH7.10_B]</b> includes Footpath TF/004 within Table 3.2 and Footpath TD/005 within <b>Table 3.1</b> as these will also require specific management during the construction of the cable route corridor. In all instances, management measures will be considered before closures.
Q2.16.8	The Applicant	<b>Public access to the countryside and perceptions of safety</b> A number of existing public rights of way would cross the proposed development. Some of these would follow a generally 30-metre-wide corridor between post and wire fencing on both sides, to a maximum height of 2.5 metres. Concern has been raised about how safe the public would feel using such paths through the development. Some paths (for instance the green lane permissive path through Site A, Path MK/Lavendon/005 through Site G (part of the Milton Keynes Boundary Walk) and Path MK/Lavendon/002 through Site G, part of the Three Shires Way) would include a continuously fenced corridor through, or adjacent to, solar panels for some distance. How would this affect the perceived potential for assistance, evasion or escape if a path user felt under threat there? Is there a risk that some members of the public may feel intimidated using such paths where they did not previously, with a resulting reduction in use of the paths concerned and hence an adverse effect on public access to the countryside?	The Applicant has acknowledged that change to the sense of enclosure along PRoWs may result in some users feeling discouraged from using those routes or have reduced enjoyment of using those routes. This has been considered as part of the assessment of changes in a route's 'desirability' as part of the assessment in <b>ES Appendix 17.1 Tourism and Recreation Receptor Tables [REP1-079]</b> . The Applicant does not however consider these to be likely to be significant or cause a substantial reduction in access to the countryside. While the experience along some routes may become more enclosed due to proposed fencing and hedgerow planting, this is not atypical of PRoWs, including some of the existing routes within or adjacent to the Order Limits. The <b>ES Figures 4.10-4.20 Landscape and Ecology Mitigation Plans [EX3/GH6.4.4.10_B to EX3/GH6.4.4.17_B and EX3/GH6.4.4.19_C, REP1-113, REP1-115]</b> demonstrates the preferential treatment for PRoWs and permissive paths is to place hedgerows or vegetation planting between recreational routes and fencelines in most locations to retain a more consistent user experience with existing PRoW conditions on the surrounding network. However, this will only be done where it can be implemented without affecting the



ExQ	Respondent	Question	Applicant's Response
			<p>ability of the land to be returned to agricultural use once the Scheme is decommissioned. This is particularly relevant to cross-site routes (such as footpaths MK/Lavendon/005 on Green Hill G, and NN TA 3-NN TD 2 on Green Hill F).</p> <p>Noting the specific examples given in the ExA's question, the green lane through Green Hill A is already enclosed on both sides by hedges to a width of approximately 7 m, with field accesses gated or spaced up to 400 m apart. The Scheme would not propose to make this route feel any more enclosed than it is already as security fencing would be placed outside these hedgerows. The Scheme also proposes to make this route a continuous loop rather than a dead-end, improving onward connectivity and increasing a users' optionality.</p> <p>Similarly, bridleway MK/Lavendon/002 through Green Hill G is for a substantive distance (&gt;400 m) bounded on one side by Three Shires Wood, and on the other by a banked hedgerow, creating an enclosed route that would not be substantially altered by the Scheme proposals.</p>
Q2.16.9	Easton Maudit Parish Meeting	<b>Easton Way</b> Please confirm whether the Parish Meeting has any remaining concerns regarding the inclusion of part of Easton Way in the scheme following the applicant's response (at EMPM-007 of its Responses to Relevant Representations document [REP1-161]) to these.	The Applicant notes that this question is not directed at the Applicant.
Q2.16.10	Stop Green Hill Solar	<b>Public access to the countryside and perceptions of safety</b> Stop Green Hill Solar's Landscape and Related Matters Statement [REP1-195] raises concerns regarding public safety when using fenced paths through the proposed development. The green lane off Newland Road north of Walgrave which would pass between solar panels is given as an example. Paragraph 8.39 of the document submits that the application would create an inescapable corridor along an existing path that was previously open to the wider countryside. It is submitted that the current route provides anyone using it who may feel under threat with numerous options for escape and means of drawing attention in the event of an emergency. Please explain what these are, and how they would change if the proposed development received consent.	The Applicant notes that this question is not directed at the Applicant.



## 2.17 Water environment

ExQ	Respondent	Question	Applicant's Response
Q2.17.1	All parties	<b>Environment Agency updated flood mapping dataset</b> Do you wish to comment on any implications for the scheme of the Environment Agency's NaFRA2 updated flood mapping dataset, released 25 March 2025?	<p>The Flood Risk Assessment and all supporting annexes were prepared using the latest NaFRA2 dataset available at the time of submission. This includes the <b>Flood Risk Assessment and Drainage Strategy Report [APP-097]</b> and the parcel specific assessments <b>[APP-100 to APP-107]</b>.</p> <p>Where the level of risk or local factors required further assessment beyond the strategic NaFRA2 mapping, this was undertaken through detailed hydraulic modelling or, for minor watercourses, through open channel Manning's calculations with the appropriate climate change allowances, as documented in <b>[APP-097]</b> and the relevant annexes.</p>
Q2.17.2	The Applicant	<b>Site G off-site hydrology</b> The applicant's Responses to Relevant Representations [REP1-161] states at Page 346 that extensive work has been undertaken at Site G to confirm that there would be no off-site detriment to flood risk. The sections of the site-wide and site-specific Flood Risk Assessment and Drainage Strategy Reports [REP1-053 and APP-107] which concern off-site flood risk are relatively brief. Please clarify whether the results of the work undertaken in respect of off-site flood risk at Site G are set out elsewhere.	<p>The assessment of offsite flood risk for Site G is not limited to the summaries in the <b>Flood Risk Assessment and Drainage Strategy Report [APP-097]</b> and the specific <b>Flood Risk Assessment and Drainage Strategy Annex Site G [APP-107]</b>. These documents include the embedded mitigation that ensures runoff is managed to greenfield conditions. This approach has been developed in consultation with the Environment Agency and the Lead Local Flood Authority and demonstrates that the Scheme will not increase flood risk off site.</p> <p>In addition to this agreed drainage strategy, the Applicant commissioned a separate catchment scale hydraulic modelling study, reported in the <b>Hydraulic Modelling Technical Note [REP2-053]</b>. This work was undertaken to understand the mechanisms that cause flooding in Lavendon and to explore whether measures within Green Hill G could provide wider community benefit. Such measures would be independent of, and additional to, the Scheme's drainage design.</p> <p>The modelling confirms that flooding in Lavendon is driven by wider catchment processes and not by runoff generated within Green Hill G. It also confirms that interventions within Green Hill G do not produce any material change in downstream flood extents or depths. The results therefore reinforce the conclusion of the <b>Flood Risk Assessment and Drainage Strategy Report [APP-097]</b> and <b>Flood Risk Assessment and Drainage Strategy Annex Site G [APP-107]</b> that the Scheme will not increase off site flood risk.</p> <p>Accordingly, the detailed evidence for offsite flood risk at Site G is contained within the <b>Hydraulic Modelling Technical Note BESS [REP2-053]</b>, which supports the conclusions of the submitted <b>Flood Risk Assessment and Drainage Strategy Report [APP-097]</b></p>
Q2.17.3	Environment Agency	<b>Flood Risk</b> Please explain whether the Environment Agency (EA) considers the applicant's proposed approach to the EA's concerns regarding hydraulic modelling (EA-016 of the Applicant's Response to Relevant Representations [REP1-161]) to be sufficient.	The Applicant notes that this question is not directed at the Applicant.
Q2.17.4	Richard Gregory	<b>Signposting enquiry</b> Please direct the Examining Authority to the location of the statement referred to at Page 3 of your written representation at Deadline 1 [REP1-283], namely that Area G's natural permeability is low, and that imported graded topsoil would be required to improve conditions.	The Applicant notes that this question is not directed at the Applicant.
Q2.17.5	Richard Gregory	<b>Geology of Site G</b> A submission at Page 18 of your written representation at Deadline 1 [REP1-283] challenges statements in the EIA Scoping Report [APP-066] concerning the geology of Site G. How, if at all, do you consider that the two submitted photographs affect the assessment of flood risk to and from Site G of the proposed development?	<p>The Applicant notes that this question is not directed at the Applicant.</p> <p>The Applicant notes that following the scoping report, a more detailed assessment of ground conditions has been undertaken and is presented in <b>ES Chapter 22: Ground Conditions and Contamination [APP-059]</b>.</p>



ExQ	Respondent	Question	Applicant's Response
			<p>Section 22.6 sets out the baseline, including the following description of geology for Green Hill G <i>'BGS data indicates Green Hill G to be underlain by superficial Diamicton of the Oadby Member in the central and northern portions. Superficial deposits are not mapped in the southern portion, however Alluvium (Clay and Silt) may encroach onto the south-eastern portion of Green Hill G, along the unnamed waterway. The bedrock is mapped as the Cornbrash Formation (Limestone) across the majority of Green Hill G, with a pocket of the Kellaways Clay Member (Mudstone) and Kellaways Sand Member (Sandstone and Siltstone) mapped in the south east portion of Green Hill G. Made Ground is not anticipated at Green Hill G. If Made Ground is encountered, it will be limited to current field boundary farm tracks of likely minimal thickness'</i>.</p> <p>The Applicant considers that the two photographs submitted by the Interested Party do not affect the assessment of flood risk to or from Green Hill G.</p> <p>Within <b>ES Chapter 10: Hydrology, Flood Risk and Drainage [REP1-024]</b>, baseline information on geology is presented at a high level using publicly available British Geological Survey datasets. This approach is standard and proportionate for flood risk assessment, where geology provides contextual information but does not control the assessment of flood risk effects for this form of development.</p> <p>The flood risk assessment for Green Hill G is based on Environment Agency flood mapping, topographic analysis, identification of watercourses and drains, existing surface water flow paths, and the nature of the proposed development, as set out in the <b>Flood Risk Assessment and Drainage Strategy [APP-107]</b>. Detailed characterisation of superficial or bedrock geology is not a determining factor in the flood risk conclusions.</p> <p>A key component of the baseline at Green Hill G is the existing agricultural land use. Current arable management can involve regular trafficking by heavy machinery, seasonal soil compaction, and field drainage interventions, all of which influence surface water runoff behaviour. Under the proposed Scheme, the land would be retained as improved grassland beneath and between the solar arrays, with reduced trafficking and long term soil management measures secured through the <b>Outline Construction Environmental Management Plan and Outline Soil Management Plan [REP1-131 and APP-550]</b>. These changes remove common agricultural runoff drivers present in the baseline and do not increase flood risk.</p> <p>The Scheme comprises ground mounted panels supported on piles, with panels elevated above ground level. The Scheme does not introduce meaningful additional impermeable area, does not obstruct overland flow routes, and does not materially alter runoff rates or volumes compared with the existing agricultural baseline. As such, localised variations in soil type or superficial geology shown in the submitted photographs do not change the flood risk assessment.</p> <p>More detailed consideration of geology and soils is reported separately in <b>ES Chapter 22: Ground Conditions and Contamination [REP1-025]</b> for the purposes of construction feasibility and soil management, rather than flood risk.</p> <p>The photographs submitted do not identify any mechanism by which flood risk would be increased as a result of the Scheme, nor do they demonstrate conditions that would invalidate the conclusions of ES Chapter 10 or the Flood Risk Assessment and Drainage Strategy. The Applicant therefore confirms that the assessment of flood risk to and from Green Hill G remains robust and unchanged.</p>