

# **Green Hill Solar Farm**

## **EN010170**

### **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses**

Prepared by: Lanpro Services

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## Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 3

### Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses

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## 1 Introduction

### 1.1 Purpose of the Document

- 1.1.1 This document provides Green Hill Solar Farm Limited's (the 'Applicant's') response to oral submissions made to the Planning Inspectorate (PINS) at Open Floor Hearing 2 (OFH2), held 12 December 2025. These hearings provided the opportunity for registered Interested Parties (IPs) and other local people to make oral representations about the application. Each IP making an oral submission was requested to provide a written summary note to the ExA for Deadline 3 (17 December 2025).
- 1.1.2 The following people and organisations were present and made submissions at the OFH2: Michael Chapman, Phillip Mason, Juliet Jarvis, Phillip Antony, Marion Turner-Hawes, Victoria Smith on behalf of Mrs Callis, Linda Twohey on behalf of Catherine Wilson, Chris Robinson, Angela Parker, Serein Partridge, Gary Elliott, Shelia English, Shena Howell, Cllr Jon-Paul Carr and Keith Burrell.
- 1.1.3 This document sets out the Applicant's response to the comments made at the OFHs. The comments have been grouped by speakers making oral representations. Where multiple representations cover the same topic area, a detailed response will only be provided for the first occurrence. Where the Applicant has made commitments on the topic, the relevant application documentation is identified. This document also provides a written summary of the oral submissions made on behalf of the Applicant at OFHs in the time allocated by the Examining Authority.
- 1.1.4 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's [Green Hill Solar Farm Examination Library](#).
- 1.1.5 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 4 to the Planning Inspectorate.

### 1.2 Summary of the Applicant's Oral Submissions at OFH2

- 1.2.1 Claire Brodrick, partner at Pinsent Masons LLP, appeared for the Applicant. Ms Brodrick thanked everyone for attending and confirmed that the Applicant had taken detailed notes of the submissions made. The Applicant recognises that there are a significant number of documents for a project of this scale and appreciates the time taken by people to review these.
- 1.2.2 The Applicant will be providing further detail in response to Ms Partridge's submissions, made also at the compulsory acquisition hearing, to show how construction will take place in this area, at Deadline 4.
- 1.2.3 A number of points were made by more than one person, and Ms Brodrick sought to respond to these. In relation to points querying how the obligations are secured, the DCO is a piece of legislation that provides a statutory obligation to comply with it. This applies to both the DCO and the management plans secured via the Requirements in Schedule 2. Before construction can commence, final management plans need to be submitted to and approved by the local planning





authority. There is a statutory obligation to comply with the approved plans and a failure to comply is automatically a criminal offence. The obligations fall on the 'undertaker', and there are strict provisions around the transfer of the benefit of the DCO to another person.

- 1.2.4 The Applicant, Green Hill Solar Farm Limited, is a special purpose vehicle. It is part of the Island Green Power group. This structure is typical for NSIPs and is designed so that the generating licence and grid connection offers are held by the Applicant directly rather than by the wider group.
- 1.2.5 The management plans are designed to deal with a number of matters raised today, including landscaping, biodiversity net gain, the inclusion of permissive paths (some new, some to formalise the existing use of walkways), BESS safety, and decommissioning.
- 1.2.6 The DCO contains a specific obligation to decommission the Scheme at the end of 60 year life or earlier if it ceases operating. The SoS has previously decided that the Requirement in the DCO is sufficient. The Applicant has entered into voluntary agreements with the landowners where the solar PV panels are located. As part of the lease arrangements, there are measures requiring the Applicant to put in place decommissioning security for the benefit of those landowners. This protects the landowner should decommissioning not take place.
- 1.2.7 In relation to community benefits, elements of the project that could result in a community benefit take different shapes and include physical measures such as permissive paths, landscaping or BNG units. These are all secured by the DCO, so do not form part of a wider s106 agreement. Similarly, the Outline Skills Supply Chain and Employment Plan **[APP-552]** is secured by a DCO Requirement, so there is not a planning need for a s106 agreement. A community benefit fund is something the Applicant has committed to. However, there is not a planning reason for the fund and it therefore the DCO cannot include an obligation for the Applicant to provide the fund. This type of community benefit fund also wouldn't satisfy the tests to be secured a s106 agreement. The government is looking at a statutory community benefit regime, but this is unlikely to be brought into force before the DCO application for the Scheme is determined. However, the Applicant is committed to putting the fund in place, and has noted the suggestions for how the fund could be used to support initiatives in the local area.
- 1.2.8 Finally, Ms Brodrick confirmed that no construction HGVs will be routed through Olney. Olney forms part of a designated Abnormal Indivisible Load (AIL) route, and a total of 4 individual AIL movements are expected to go through Olney during the construction period.



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

### 2.1 Michael Chapman

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MC-001	Flood Risk and Drainage	Communications to date	Mr Chapman noted that Lavendon Parish Council has tried to engage professionally and constructively with the Applicant and has communicated its concerns to the Applicant regarding the visual, ecological and flood risks of the Scheme. The parish was flooded last year, and flooding risk will be increased by the Scheme. The Parish Council is disappointed with the discussion it has had with the Applicant, having submitted two representations; the Applicant has not made concessions.	<p>The Applicant respectfully disagrees with the Interested Party's oral submission that the Scheme would increase flood risk.</p> <p>Flood risk has been assessed in detail within <b>ES Chapter 10: Hydrology, Flood Risk and Drainage [REP1-023]</b> and the Flood Risk Assessment and Drainage Strategy suite, including the main <b>report [REP1-053]</b> and site specific annexes <b>[APP-098]</b> to <b>[APP-108]</b>, <b>[REP1-055]</b> and <b>[REP1-057]</b>. These assessments demonstrate that the majority of the Order Limits are located within Flood Zone 1, with limited interaction with Flood Zones 2 and 3 where proportionate, site specific hydraulic assessment has been undertaken. The Scheme will not increase flood risk to third parties, with post development runoff controlled to greenfield or better.</p> <p>The assertion that solar panels inherently increase flood risk is not supported by policy or evidence. National Policy Statement EN-3 states that where a</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Flood Risk Assessment has been undertaken, solar PV panels draining to the existing ground will not, in general, result in significant drainage impacts (paragraph 2.10.84). This is consistent with established research, including work by Cook and McEwan.</p> <p>The principal mechanism by which runoff could be affected is temporary soil compaction during construction rather than panel coverage. This has been assessed and is managed through embedded mitigation secured via the <b>Outline Construction Environmental Management Plan [REP1-131]</b> and the <b>Outline Soil Management Plan [APP-550]</b>.</p> <p>Bespoke hydraulic modelling has also been undertaken to understand flood mechanisms affecting Lavendon, reported in the <b>Hydraulic Modelling Technical Note Lavendon [REP2-053]</b>. The modelling confirms that flooding is driven by wider catchment scale processes and that the Scheme would not materially influence flood risk within the village.</p> <p>No technical evidence has been identified to indicate that the Scheme would exacerbate flooding.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MC-002	Flood Risk and Drainage	Site Boundary	<p>Mr Chapman suggested that Field GF13 should be withdrawn from the Scheme as this will materially reduce the flood risk and visual impacts as has previously been discussed with the Applicant. GF13 could instead be used for flood attenuation measures like swales and berms, which will protect the area from flooding. GF13 intrudes into surrounding landscape.</p> <p>Also, Field GF9 should be withdrawn from the Scheme as this will materially reduce the flood risk and visual impacts and is on the periphery of the ancient woodland, Lavendon Woods. The Milton Keynes Local Impact Report states that Lavendon is on the edge of a special landscape area (which is included in the Milton Keynes Strategy for 2050). GF9 is also next to and part of the scenic environment for Three Shires Way, which is used by cyclists and walkers.</p>	<p>The Applicant notes the Interested Party's suggestion that Fields G13 and G9 should be withdrawn from the Scheme in order to mitigate flood risk and provide land for flood attenuation.</p> <p>The Applicant's position on flood risk, including the assessment undertaken, the conclusions reached, and the evidence base supporting those conclusions, is set out in the response to MC-001 and is not repeated here.</p> <p>In summary, the Scheme has been designed to ensure no increase in flood risk to third parties, and this outcome does not rely on the withdrawal of individual fields or the provision of additional flood attenuation areas. As confirmed by the hydraulic modelling reported in the <b>Hydraulic Modelling Technical Note Lavendon [REP2-053]</b>, flooding in the area is driven by wider catchment scale processes, and measures located solely within individual fields such as G13 or G9 would not materially influence flood risk.</p> <p>Accordingly, the withdrawal of Fields G13 or G9 is not required to achieve an acceptable flood risk outcome.</p> <p>It is acknowledged by Officers at Milton Keynes City Council that Site G,</p>





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				including fields GF9 and GF13 are located in an area identified as a suitable location for solar development, set out in EMKLP Policy GS7. The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting, helping to protect and enhance the landscape through the landscape- led design.
MC-004	Ecology and Biodiversity	Breeding Birds	Mr Chapman raised concern that the significant population of skylarks identified may be affected as some of the Scheme panels will be built on the current nesting places. There is concern that this will mean the skylarks are not adequately protected. GF9 could instead be used to provide nesting sites for the skylarks.	Please refer to the Applicant's response to <b>LT-001</b> below in this document in regard to the skylark assessment.
MC-005	Landscape and Visual Impacts	Planting and visual impacts	Mr. Chapman suggested that the Scheme will cause significant visual impacts on the people who use this area. The proposed planting by the Applicant will take many years to mature and, in the meantime, the visual impact will be particularly bad.  The Parish Council objects to Site G being used as a solar farm.	The Landscape and Visual Impact Assessment (LVIA) <b>[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



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				infrastructure. However, these effects would be limited to the site itself and its immediate setting. As planting 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.



## 2.2 Phillip Mason

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PM-001	Development Consent Order	Community Benefit	Mr Mason raised concern that the community benefit fund will not be paid as is not included in the DCO; this risk is increased if the Scheme succeeds and is then sold on. A local example in Irchester shows this; after the site was sold on, the benefit of £50,000 was not paid as promised from the solar farm developer.	<p>Please refer to the Applicant's response to 'NNC-085' for details relating to community benefits in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b>.</p> <p>Where other projects by Island Green Power, the Applicant's parent group, have promised community benefits, these have been paid, or the new owner has committed to paying them.</p> <p>The Applicant is also awaiting guidance from government on expectations for community benefit funding that will apply to all solar developments.</p>
PM-002	Development Consent Order	Community Benefit	Mr Mason suggested that the Applicant has promised they will offer a comprehensive community benefit package but as there is no legal mechanism in place, there is no guarantee that future owners will continue this intention. For example, the Great North Solar Park developer, Elements Green, intended to provide circa £1m per annum as a community benefit, however at a recent Newcombe Parish Council meeting, they were informed there is no obligation to provide this.	<p>Please refer to the answer above (PM-001) and 'CRNMPC-008' in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PM-003	Development Consent Order	Community Benefit	The purpose of a community fund must be to mitigate the planning harms caused by the Scheme to the community. Will the Applicant ensure a fair and ongoing community benefit is guaranteed to be paid throughout the Scheme life, in recompense for the permanent disfigurement of our locality, impairment of our public rights of way, and significant disruption to our roads and village during construction?	<p>Please refer to the Applicant's response to 'NNC-085' for details relating to community benefits in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b>.</p> <p>The Applicant has committed to an annual Community Benefit Fund to run throughout the life of the project.</p>



## 2.3 Juliet Jarvis

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
JJ-001	Socioeconomics, tourism and recreation	Equestrian businesses	<p>Ms Jarvis noted that Grendon has over 100 horses, yet the liverys have not been properly discussed in the application. There are several, for example Villa Farm, Top Lodge livery, Park Hill livery, Low Farm livery and Manor Farm livery. All are affected by the Scheme. Many equestrian businesses will be curtailed by the construction of the Scheme. HGVs should not be on the local roads, but they are. The Scheme will make this worse. The bridleways in Easton Maudit will be impassable during construction and compromised during operation.</p> <p>Other routes will also be affected. From Grendon, the specific routes from Yardley Road, Easton Maudit and Station Road are fundamental for hacking and horse riding. There is a construction site on Yardley Road. The routes around Sywell will also be closed. No let up will be given for those riding in non-working hours. It is remarkable that horse riders are not considered high sensitivity receptors in every respect.</p> <p>Specific mapping and assessment should be made for rural businesses and equestrian facilities as part of the consideration for this Scheme.</p>	<p>Please refer to the Applicant's response to 'SOC-003' with regard to the assessment of equestrian facilities and effects on PROWs in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b>.</p> <p>Each of the identified liverys and equestrian businesses has been assessed in <b>ES Appendix 17.1: Tourism and Recreation Receptor Tables (Revision A) [REP1-079]</b> (revised to resolve the omission of Villa Farm at submission) which finds no greater than a moderate-minor adverse effect to any individual facility, subject to implementation of construction, traffic, and PROW mitigation measures. These measures are set in place to ensure that the keeping of horses in fields and stables, and the riding of horses on roads, byways and bridleways affected by the Scheme are not significantly impacted.</p> <p>The <b>Transport and Access Routes Supporting Document [REP1-167]</b> identified routes for HGVs and other construction vehicles which avoid villages and local roads where possible, providing</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Having the rural spaces through footpaths and bridleways is important for mental health. The impact of the Scheme completely hinders this rural balance.	<p>the most direct routes from the primary road network.</p> <p>These measures are set out in the <b>Outline Construction Environmental Management Plan Revision A [REP1-131]</b>, <b>Outline Construction Traffic Management Plan (Revision B) [REP3-064]</b>, and <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision B) [REP3-066]</b>.</p> <p>Construction working hours have been set to reduce construction time onsite whilst also protecting residential amenity during evenings and nights. Within this, construction deliveries by HGV will be scheduled to arrive between 09:30-16:30 to minimise impacts on the road network for vehicular users and recreational non-vehicular users in the mornings and evenings.</p>
JJ-002	Landscape and Visual Impacts	Planting and visual impacts	During the early consultation period, the Applicant showed the local community plans for low level plans with lots of greenery and sheep; can the Applicant assure us that the panels lined east to west of at least three metres will not utilise the same or similar specification as the Cleve Hill Solar Park?	<b>Environmental Statement Chapter 4: Scheme Description Revision A [REP1-031]</b> sets out the proposed infrastructure to be used within the Scheme. This includes the type of solar photovoltaic panels (Solar PV Panels) proposed. The <b>draft DCO Revision C [REP3-024]</b> seeks consent for both tracker panels (Option A outlined in Plate 4.1 of <b>[REP1-031]</b> ) and fixed panel



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				options (Option B outlined in Plate 4.2 of <b>[REP1-031]</b> ) within the array Sites. The Applicant confirms that these design options are not the same as an east-west fixed panel design described by Ms Jarvis. The exact panel design, layout and specification will be decided at the detailed design stage but will need to meet the parameters set out in the <b>Concept Design Principle and Parameters Revision A [REP1-151]</b> . This is secured in Requirement 5 in Schedule 2 to the <b>draft DCO Revision C [REP3-024]</b> .
JJ-003	Development Consent Order	Power Supply	Ms Jarvis referred to Cleve Hill Solar Park, suggesting it supplies around 60% of its produce power to Tesco for its stores. The Applicant has stated this project will supply the equivalent of 115,000 houses for power; can the Applicant confirm the produced power will indeed go into the grid to reduce the electricity bills in residential homes rather than for a commercial purpose as with Cleve Hill?	Section 7.2 of the <b>Statement of Need [APP-556]</b> explains that the Scheme will connect to the National Electricity Transmission System (NETS) at Grendon. By connecting to the NETS, generation from the Scheme will be transmitted to both local consumers and across the country where it is required. This is a key benefit of the Scheme and helps the UK's electricity system operate efficiently which is a benefit to all consumers, including local domestic consumers, who, through their energy bills, pay towards the operational costs of the UK's electricity networks.  Further, Section 10.2 of the Statement of Need explains how low marginal cost



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				generators like solar power reduce the traded price of power. Bringing forward any GB renewable scheme which connects to the NETS means that the power produced will go into the grid and will help reduce the traded price of power, regardless of the final end consumer of that power. GB renewable generation schemes also help reduce the exposure of our national energy supplies to volatile international markets, helping keep bills down and delivering a more affordable low-carbon, secure energy system.
JJ-004	Development Consent Order	Community Benefit	Ms Jarvis noted that the Applicant said it will deliver a community benefit annually for the lifetime of the Scheme of many hundreds of thousands of pounds to local communities. Is this significant commitment real and definitively written into the DCO?	The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations.  In terms of the Applicant's commitment, refer to the response to PM-001 above.
JJ-005	Transport and Access	Access to PRow	Ms Jarvis noted that the Applicant claims to improve rural access and rights of way.  Ms Jarvis questioned whether the Applicant could provide the plans to show the access tracks at the very least between Green Hill BESS and Easton	The temporary construction haul roads required between Grendon, Construction Compound 4 and Green Hill F will be within the Cable Route Corridor. A <b>Transport and Access Routes Supporting Document [REP1-167]</b> has



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Maudit, with the construction compound in the middle, where machinery will be moving through? Can the Applicant guarantee that these movements are included in the HGV plans? Can this be written into the access plans?</p> <p>Can the Applicant confirm these aggregates are considered within the HGV movement?</p>	<p>been submitted to clarify the routes proposed for HGVs, workers and abnormal loads. The forecast of HGV movements for the cable route compounds are set out in table 13.15 in the <b>ES Chapter 13 Transport and Access [REP2-003]</b> which includes for the construction of haul roads.</p>
JJ-006	Health and Wellbeing	Community identity and rurality	<p>This area hosts rural businesses and way of life; the impact of the Scheme completely affects the balance. This effects the mental health of residents and visitors coming to experience PROWs and visit heritage locations. Riding routes around substations and panels will be ruined.</p>	<p>The assessment in <b>ES Chapter 18: Human Health [APP-055]</b> assesses the physical and mental health and wellbeing and social impacts of the development, such as in consideration of “community identity, culture, resilience and influence” and access to “open space, leisure and play”. The assessment finds that whilst there will be some level of changes in perception of rurality in the surroundings, there is not anticipated to be any significant adverse effects to personal or community wellbeing.</p>
JJ-007	Transport and Access	Bridleways	<p>Conservation of the access ways is crucial. The Scheme needs to account to improve rural access.</p> <p>Ms Jarvis questioned where are the proposals for the new bridleway routes from the Applicant? Plans so far only show rerouted existing ways, not creating</p>	<p>The Scheme provides permissive paths within the Sites to allow greater public access to the countryside and will provide a beneficial impact on PROW use for local users and visitors through mitigating adverse impacts on other PROWs and providing alternative access routes to the use of the local highway network. These</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			new ways, whilst the Scheme is taking other routes away.	<p>measures, when implemented, will enhance connectivity in the local area and may help to improve recreation in the immediate vicinity.</p> <p>These are shown as Work No. 10A and 10B on the <b>Works Plans [REP3-008]</b>, on <b>ES Figures 4.10-4.20 Landscape and Ecology Mitigation Plans</b> (as revised), and on <b>ES Figure 4.22 Indicative Permissive Paths [APP-221]</b>. The Applicant will provide an illustrative standalone plan which shows permissive paths and Public Rights of Way together at Deadline 4.</p> <p>These permissive paths are alternatives or formalisations of existing permissive routes, providing alternative means to using PRowS and local highways. These routes do not replace existing PRowS, which are retained in full during the operational lifetime of the development.</p>





## 2.4 Phillip Anthony

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PA-001	Human Health	House prices and mental health implications	<p>Mr Anthony made reference to ES Chapter 18 Human Health [APP-055] and ES Chapter 15 Glint and Glare [APP-052] during his submissions.</p> <p>Mr Anthony noted that National Policy Statement EN-1 at paragraph 4.4.3 recognises that new energy infrastructure may affect the composition of the local population and may have indirect health aspects.</p> <p>The Applicant's report on this states that results are based on 'professional judgment'. However, there are contradictions in the Applicant's work on subjective data; the report dismisses effects on house sales as 'not consistent and predictable'. A real estate agent has estimated that in Walgrave a 20% reduction in house prices will occur if the Scheme goes ahead. This is real data, whereas the Applicant has been making subjective statements. The report makes very limited reference to Walgrave, Lavendon and Holcot, because their locations mean the Scheme is 'less visible' there. This response ignores the real data relating to Walgrave.</p>	Please refer to the response to 'KB-007' in the written summary of the oral submissions at <b>Open Floor Hearing 1 and the Applicant's Responses [EX3/GH8.1.23]</b> in respect of residential property value, and why it has not been assessed.
PA-002	Human Health	Professional Experience	Mr Anthony questioned what the professional experiences are of the authors who wrote the report on health and why have their conclusions been validated?	The Applicant's professional experience is set out in the <b>Statement of Competence [APP-065]</b> . The topic technical lead and chapter author are, as set out, from a planning and EIA background, with specialist experience in



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				human health assessment in relation to spatial development.
PA-003	Human Health	Consultation	Mr Anthony noted that the scope of consultation was agreed with local authorities through the statement of community consultation. He questioned when was human health and wellbeing discussed during and after consultation, with whom, and what suitable mitigation measures were identified following the consultations?	<p>Human health and wellbeing was provided as a topic for discussion at statutory consultation for commentary by statutory consultees and local stakeholders, based on preliminary health information provided in the Preliminary Environmental Information Report (PEIR). The matters discussed included all matters set out in the preliminary Health and Wellbeing chapter (PEIR Chapter 18).</p> <p>Comments from statutory consultees (local public health teams, and Office for Health Improvement and Disparities) were responded to through the <b>ES Chapter 18: Human Health [APP-055]</b> prior to submission, with any identified health effects being used as a catalyst for ensuring mitigation is secured through the relevant management plans.</p> <p>These measures included the implementation of permissive paths, specific transport and PRow mitigation measures to protect PRow users from conflicts with HGVs, targeted noise mitigation, construction mitigation measures to reduce strain on GP practices, and targeted spatial measures due to the identification of Oakfield, Easton Maudit as a receptor with a substantial concentration of</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				people of high sensitivity to changes in their health and environs.
PA-004	Human Health	Consultation	Mr Anthony questioned why there is an absence of public consultations in Mears Ashby and Holcot where relevant questions on human health and wellbeing might have been explored?	<p>Specific consultation events in Holcot and Mears Ashby were not undertaken due to a lack of suitable venue availability.</p> <p>For further information on the consultation undertaken by the Applicant please see the response to <b>SBMP-0006</b> in the <b>Applicant Responses to Relevant Representations document [REP1-161]</b>.</p>
PA-005	Human Health	Assessment undertaken	<p>The static data the report uses have no reference to any pre- and post-construction sites elsewhere. The Applicant's judgment of the long-term impacts of construction on health and community wellbeing is pure speculation. The Examining Authority should take into account the collective views of local residents and use survey data to account for the full impacts in the near- and long-term future.</p> <p>There Scheme will weaken the bonds between people and community, diminish people's sense of place and belonging, and increase depression and anxiety, in addition to the possibility of severe toxicity in the event of fire.</p>	<p>Data collected for the assessment in <b>ES Chapter 18: Human Health [APP-055]</b> is based on the most recent publicly available statistical information and is supplemented by qualitative data from those attending pre-submission consultation event, and providing written feedback during the statutory consultation process.</p> <p>The assessment methodology uses professional judgement to consider a likely worst-case effect on human health as a result of construction activities, based on industry guidance, and professional experience. Whilst construction of large-scale solar projects in the UK has been limited to Cleve Hill Solar Farm (as of 2025), construction impacts from other types of development (other energy developments, and large scale residential or employment sites) are used to</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>understand likely health effects from specific types of impacts.</p> <p>The Applicant has sought to assess the likely impact on community cohesion and sense of place, through assessing “community identity, culture, resilience and influence” and physical cohesion through assessing “transport modes, access and connections”. Health impacts from fire events have been assessed in regard to “water quality and availability”, “air quality”, and “land quality”, based on the assessment findings in <b>ES Chapters 10 [REP1-023]</b>, <b>16 [APP-053]</b>, and <b>22 [REP1-025]</b> respectively. The Applicant understands that there will be some adverse effect, but has assessed that with the mitigation measures secured by requirement in the <b>draft DCO Revision C [REP3-024]</b> that these are not significant adverse effects.</p>



## 2.5 Marion Turner-Hawes

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MTH-001	Development Consent Order	Community Benefit Fund	Ms Turner-Hawes suggested that there has been very little mention of community benefit in the Scheme documentation; though this may not be required at the moment, this is important for local communities. It is not clear what benefit if any could come to local residents.	The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations.
MTH-002	Development Consent Order	Community Benefit Fund	<p>Ms Turner-Hawes suggested when considering DCO applications for solar farms, the community benefit part should be examined properly by examiners. There should be a fair deal for local and national communities. People want to see the benefits, but the Scheme must consider the local communities. It is perverse that the energy that will be provided by the Scheme, no benefit will be given to the locals.</p> <p>Ms Turner-Hawes noted the following possible community benefits to be included:</p> <ul style="list-style-type: none"><li>• Some solar and energy projects are discussing partnership and share offers with local communities; the minimum should be s106 commitments and community funds. Legal community partnerships enabling ownership of financial benefit and to give locals a voice on the Scheme are suggested.</li></ul>	<p>The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations.</p> <p>The Applicant notes Ms Turner-Hawes comments, which appear to be a suggestion the Community Benefit Fund should address building retrofit for energy efficiency. The Applicant will add this suggestion to the feedback already received in considering the design of the Community Benefit Fund.</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<ul style="list-style-type: none"><li>The skills, experience and insight of the Applicant should be used to support and educate communities improve their own energy efficiency. This knowledge should be shared and funding made available for home energy transition.</li></ul> <p>Local authorities should work with the Scheme experts to create strategic area wide strategic energy plans to work towards the transition and address fuel poverty in the area. Ms Turner-Hawes noted that there was an opportunity for the Scheme to create a model for the future for how large solar projects can support communities and provide a fair deal for communities.</p>	
MTH-003	General Matters	Alternatives	Ms Turner-Hawes noted that the panels should go on warehouses and buildings rather than on farmland.	Please refer to the response to ALT-002 and SAMP-004 in the <b>Applicant's Responses to Relevant Representations [REP1- 161]</b> with regard to use of rooftops and the site selection assessment.
MTH-004	General Matters	Energy Poverty and Net zero	Taking climate action and enabling green clean energy is about empowering communities as well as meeting basic needs. How the Scheme lands is important . People want to afford energy but also have their needs met. Government has net zero targets but the building stock in this area are not equipped. Only 50% of properties are near a Class C energy rating	The Applicant notes that the National Policy Statement for Renewable Energy Infrastructure (EN-3) which provides at paragraph 1.1.4: "More low-cost renewables on the system will reduce household electricity bills and help to increase security of supply through domestic energy production." This is reflected in the <b>Statement of Need [APP-</b>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			as required by 2028/30. Wellingborough and Northampton communities have energy poverty. The Scheme should inspire people to take the net zero actions we need to take, however at the moment the Scheme does not do this.	<b>556]</b> which sets out that large-scale solar power decarbonises the electricity system and lowers the market price of electricity by generating power so that expensive and more carbon intensive forms of generation do not need to generate as much. In doing so, solar power delivers national decarbonisation benefits and supports consumer affordability aims, to the benefit of electricity consumers.



## 2.6 Victoria Smith

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
VS-001	Human Health	Mental Health impacts	Ms Smith noted that mental health issues are being caused by COVID and other issues such as having solar farms being imposed on people in totally inappropriate areas. Sywell reservoir nearby may be the only consolation area available for local people to find tranquillity if the Scheme goes ahead.	<p>The assessment of health and wellbeing impacts associated with the Scheme are set out in <b>ES Chapter 18: Human Health [APP-055]</b> and identify no significant effects to human health and wellbeing, either physical or mental, as a result of the Scheme.</p> <p>The appropriateness of the location for this Scheme has been set out in <b>ES Appendix 5.1: Site Selection Assessment Revision A [REP1-037]</b>. Assessment of health and wellbeing matters has therefore been considered independently of this and assesses the impacts of the Scheme as it has been proposed.</p>
VS-002	Development Consent Order	DCO process	<p>Ms Smith suggested that going through the DCO process means the Scheme can bypass the local planning laws/guidance.</p> <p>The reassurances given by the Applicant are not legally binding and have no ongoing accountability.</p>	<p>The Scheme is automatically deemed nationally significant due to its size (i.e. being a generating station with a capacity of more than 50MW in accordance with Section 15(2) of the Planning Act 2008. The commitments are secured by the Requirements in Schedule 2 to the <b>draft DCO Revision C [REP3-024]</b>. A failure to comply with any of the requirements of a DCO is a criminal offence, therefore the Applicant respectfully disagrees that it is not legally binding.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
VS-003	Major Accidents and Disasters	Fire risk due to weak water pressure	Ms Smith raised concern that electric battery fires are inextinguishable. The Scheme has 92 battery storage units at BESS C, at the edge of Sywell Aerodrome's runway, posing a significant risk to the adjacent ancient woodland. The fire service admits it is compromised by the weak water pressure. The DCO should be refused if there is a risk of the battery storage facility causing an ecological disaster affecting water entering the reservoir.	<p>Section 5 of the Applicant's <b>Outline Battery Storage Safety Management Plan (OBSSMP) [REP1-143]</b> covers all requisite firefighting considerations including, fire breaks, firefighting water containment, firefighting water supply requirements, all aspects of Emergency Planning including Emergency Response Plans and Risk Management plans, and summaries of Plume Study consequence modelling to validate BESS site locations.</p> <p>The Applicant and Northamptonshire Fire and Rescue Service (NFRS) signed a Statement of Common Ground (SOCG) [REP2-063] which demonstrates that the Applicant has followed all key BESS safety guidance and has fully assessed fire, explosion, toxic emission, and flood risks. The SOCG confirms the Applicant commits to the prioritising the following four key safety areas identified by NFRS:</p> <ol style="list-style-type: none"><li>1. National Fire Chiefs Council (NFCC) Guidance for design of Battery Energy Storage System (BESS) sites</li><li>2. BESS Safety Standard commitments for the Scheme.</li><li>3. BESS area firefighting provisions and expectations for NFRS involvement.</li></ol>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>4.NFRS site access and operational control requirements</p> <p>As outlined in the OBSSMP the water supply is not taken from the local water mains supply. The BESS area would be designed to integrate pressure fed (pump driven) fire hydrants and/or static water tanks for firefighting, dependent on available water supply. Water tanks will be located at least 10m from the nearest BESS enclosure. Water access points, whether hydrants or tank connections, would be located in consultation with the NFRS to provide redundancy and safe operating distances for firefighters. A minimum of four hours water supply will be provided at a flow rate of 1900 LPM in line with National Fire Chiefs Council (NFCC) Guidelines.</p> <p>Section 4.1.22 of the OBSSMP stipulates:</p> <p><i>“The BESS system selected at detailed design will have undertaken Large Scale Fire Testing (LSFT) and utilised rigorous site-specific consequence modelling reports to demonstrate that in the event of a BESS failure loss will be safely limited to one BESS enclosure without the intervention of NFRS;”</i></p> <p><i>“LSFT of the selected BESS design to establish minimum equipment spacing</i></p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<i>distances and site-specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with NFRS. An independent Fire Protection Engineer specialising in BESS will validate all UL 9540A, LSFT, and / or third-party test and site-specific consequence modelling data which has been provided."</i>
VS-004	Development Consent Order	Community Benefit Fund	Ms Smith raised concern that the community benefit may not be acted upon. As the Applicant is wholly controlled by its holding company Island Green Power and the Scheme may be sold on very quickly to someone else once the Applicant is finished, any promises may not be upheld.	<p>The Applicant is committed to ensuring that communities benefit from the Scheme, including by receiving direct funding to important causes in the local area. During the development of the proposals for the Scheme, the Applicant consulted on community benefits and, based on feedback, will determine how best to distribute funding. The Applicant anticipates that government-supported best practice guidance on community benefits will be issued in the near future and will incorporate this guidance in its approach.</p> <p>The Scheme will also generate business rates that are paid to the local authority and support local services.</p>
VS-005	Agricultural and Soils	Farmland loss	Ms Smith suggested that rural and farming knowhow will be lost if the farmland is taken by the Scheme. Rural life,	The proposed development only results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing. Rural and farming



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			biodiversity and food security will be harmed by the Scheme.	knowhow can be still applied to the land during operation.  Of assessed landholdings impacted, this accounts for no more than a 27% loss of land to any individual landholding (as assessed in <b>ES Chapter 20: Agricultural Circumstances [APP-057]</b> ), demonstrating that these farming businesses are likely to be able to continue to grow food whilst having a more stable income stream available to them.
VS-006	Development Consent Order	Project lifetime and cost	Ms Smith noted that 60 years is a long time with the way technology moves today; what will happen on these panels when they become obsolete – who will bear the cost of decommissioning the land and how will the farmland be reinstated? Will responsibility fall to the government or local councils?	In respect of decommissioning, Requirement 21 of Schedule 2 to the <b>draft DCO Revision C [REP3-024]</b> requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. The Applicant has agreed leases with the landowners of the solar PV sites, which include a requirement to provide security for the benefit of the landowner to cover any circumstance where there is a failure to decommission the Scheme.  The Applicant notes that there is no policy requirement for a decommissioning fund to be imposed and paragraphs 2.10.146 to



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments. The Applicant considers that Requirement 21 complies with paragraphs 2.10.146 to 2.10.148 of NPS EN-3.</p> <p>The Secretary of State has considered this point in previous decisions for solar projects under the Planning Act 2008 and determined that imposing a decommissioning fund requirement is not necessary.<sup>2</sup> This is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed.</p>
<b>Comments on behalf of Mrs Callis</b>				
VS-007	Agricultural and Soils	Farmland loss	Comments noted the village and surroundings will be evidently impacted by the Scheme. One third of the acreage of the Scheme lies within the Mears Ashby parish boundary. 1670 acres of good quality farmland exist in the parish; 1000 acres will be destroyed by the Scheme. The Scheme disproportionately takes from Mears Ashby in comparison to others.	The Scheme results in temporary loss of productive farmland as the land will be still in agricultural use as grassland for grazing, contributing to food production. The land will return to full agricultural use after the project lifecycle. The land under grassland use would be a long-term fallow and will enhance the quality of the soils and land in long term. The land for the proposed



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Scheme can serve as a strategic land reserve underpinning national food security.</p> <p>Construction activities will be in compliance with the soil mitigation measures in the final soil management plan to protect soil resources and land during construction.</p> <p>The Applicant has undertaken a 5-Stage Site Selection Process with a Widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area <b>Appendix 5.1 (Site Selection Assessment [REP1-037])</b> in compliance with 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 Contact on commercial feasibility and the efficiency of the transmission of electricity to the grid.</p>
VS-008	Scheme Description	Alternatives	<p>The Applicant did not sufficiently consider alternative locations, such as the old British Steel site near Corby that is government owned with a connection to the National Grid.</p> <p>Where is the evidence of the alternative location considerations and how were they sufficient?</p>	<p>The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within <b>ES Appendix 5.1 Site Selection Assessment Revision A [REP1-037]</b>. The former British Steel site at Corby and that general location in Corby is covered by various planning policy designations in the North Northamptonshire Joint Core Strategy (2016) which allocates uses of B1 (Business), B2 (General</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Industry) and B8 (Distribution uses). As part of the site selection process, the Applicant sought to avoid land which has existing policy allocations other than for renewable energy. That part of Corby is approximately 28km north east of the Scheme's grid connection at Grendon Substation. This is beyond the viable radius of 20km as set out in <b>ES Appendix 5.1 Site Selection Assessment Revision A [REP1-037]</b> .
VS-009	Development Consent Order	Project mitigation and cost	Comments question who will be providing for the mitigation like wild flower meadows and sheep grazing, which have large costs? Suggesting that the proposals are not practical or realistic.	Green Hill Solar is committing to provide mitigation and therefore the cost for doing so is factored into funding for the Scheme. Additionally, Green Hill Solar will be required to comply with the management plans, which set out the landscape maintenance required, and are secured by the Requirements in Schedule 2 to the <b>draft DCO Revision C [REP3-024]</b> . Please refer to the <b>Funding Statement [CR1-020]</b> for further information.



## 2.7 Linda Twohey

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LT-001	Ecology and Biodiversity	Impacts to habitats and hedgerows	<p>Ms Twohey suggested that fields AF14 and AF29 should be removed from Scheme. The design choices for Site A made by the Applicant could be modified to reduce the significant effects on hedgerows, bats, birds, agricultural land and locals. Some of the hedgerows affected are deemed important in Site A; there is an inconsistency here as others are not.</p> <p>In the location where the cabling route exists Site A, survey results showed that most of the high suitability trees within Site A are clustered around the edge of Field AF24, exactly where the substation has been placed; this will affect the protected bats and roosting areas and may be unlawful.</p> <p>Skylarks have been found in highest density in Site A, almost all the indicative territories will be lost. Removing AF29 and AF14 from the Scheme would make a significant difference to the number retained. Yellowhammers also nest in the hedgerows in field AF29.</p> <p>Suggestions that the reasons for the fields not being chosen for solar is based on impacts on the landowner and their personal views, the underlying important</p>	<p>It is not clear what impacts on hedgerows, bats or birds could be reduced through the removal of Fields AF14 and AF29. Approximately 9m of hedgerow loss is anticipated across both of these fields to facilitate the installation of an access track, however the Scheme would also result in the planting of approximately 668m of new hedgerows along the eastern boundary of these two fields.</p> <p>The criteria used to determine the 'Importance' of hedgerows are detailed in Part II of Schedule 1 of the Hedgerow Regulations 1997. The classification of hedgerows as 'Important' or 'Not Important' has been derived from a combination of field survey evidence, professional judgement by competent ecology and heritage professionals, and supporting desktop studies, in full accordance with the requirements of the Hedgerow Regulations 1997. The Applicant sets how the assessment of hedgerow importance is undertaken in response to action point 3 under agenda item 3.2 in the <b>Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>archaeology in AF1, inappropriate gradient and slope direction, and important ecology around the stream in the west part of the Site.</p> <p>Removing AF14 and AF29 from the Scheme would considerably reduce the landscape and visual, glint and glare and noise impacts for users of the Quiet Lane.</p>	<p>With regard to roosting bats, protective ecological buffers around any trees identified as suitable for roosting bats have been incorporated into the design of the Scheme, as detailed in <b>ES Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]</b>. <b>Section 3.3 of the Outline Ecological Protection and Mitigation Strategy (Revision A) [REP1-139 and REP1-140]</b> (OEPMS) states that these buffer zones will be demarcated by biodiversity protection fencing during the construction phase, within which no site personnel or machinery shall enter. Following the implementation of these measures, as well as other measures detailed in <b>Environmental Statement Chapter 9 [REP1-033]</b> and the <b>OEPMS [REP1-139 and REP1-140]</b>, the assessment concludes that no adverse residual effects on roosting bats are anticipated during the construction phase of the Scheme. Additionally, new bat roosting boxes will be provided across the Scheme to enhance the roosting capacity of the local area for bats.</p> <p>Full assessments of impacts on breeding and wintering birds, including skylark and yellowhammer, are also included in <b>Environmental Statement Chapter 9</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p><b>Ecology and Biodiversity (Revision A) [REP1-033].</b></p> <p>With regard to skylark, prior to the implementation of additional mitigation measures, a significant adverse effect on breeding skylark at the County level is predicted; this being chiefly due to displacement of nesting skylarks due to the installation of the solar arrays. Additional mitigation measures have been implemented to reduce net displacement as much as practicable. This includes the retention of a number of fields within the Scheme which will be managed as habitats suitable to support nesting skylark for the duration of the operational phase of the Scheme. Foraging opportunities would also be enhanced through the provision of permanent grassland in contrast to current, intensively managed arable fields. Together, these measures are predicted to allow 44.5% of the baseline skylark population to persist within the Sites. Nonetheless, the <b>Environmental Statement Chapter 9 – Ecology and Biodiversity</b> concludes that there will be a residual adverse effect at the District level through the permanent displacement of a significant proportion of the breeding skylark population. Residual effects on wintering skylark during the operational</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>phase of the Scheme are predicted to be significant and beneficial at the Local level on account of the improvements to the habitats and sensitive management.</p> <p>With regard to yellowhammer, prior to the implementation of additional mitigation measures, the assessment concludes neutral, non-significant effects on breeding birds of boundary habitats (including yellowhammer), due to the retention of the boundary habitats and hedgerows. Yellowhammer is considered likely to continue to nest in hedgerows and field margins, and to forage within the operational arrays. With extensive new planting, the diversification of habitats and sensitive management, a residual significant beneficial effect on breeding birds of boundary habitats (including yellowhammer) is predicted. Residual effects on wintering yellowhammer during the operational phase of the Scheme are predicted to be significant and beneficial at the Local level for similar reasons.</p>
LT-002	Transport and Access	Impacts specific locations	Ms Twohey noted that during the December 2024 consultation event in Walgrave, the Applicant did not know about the designation of the quiet lane designation (a minor rural road prioritised for leisure and recreation) of Newland Road, nor that the green lane branching off	The designation of Newland Road as a Quiet Lane was understood prior to the Walgrave consultation. In part, the designation is the reason why construction traffic is not proposed to use Newland Road to directly access Green Hill A.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>Newland Road has been used by villagers for living memory.</p> <p>Green Lane lacks formal public right of way status. If fields AF29 and AF14 were not used for scheme, this could make a major reduction in the significant negative impacts on these two roads. These fields border more than half of the affected east side of Newland Road and the west side of Green Lane. The rurality and hedgerows will be much better retained.</p> <p>A survey conducted in August 2024 by Ms Twohey showed 85 of 95 people regularly use these lanes for recreation. Ms Twohey submitted nine individual narratives regarding this in REP1-201. The current permissive path along the Green Lane should be made an official public right of way as a landowner may remove permissive access at any time.</p>	<p><b>ES Chapter 5: Alternatives and Design Evolution [APP-042]</b> sets out the reasoning for design choices made at Green Hill A. It was not considered necessary due to environmental constraints that fields AF14 or AF29 required removal from the Scheme.</p> <p>The Applicant is leasing the solar PV sites from landowners and is therefore seeking to avoid permanent changes to ensure the land can be fully returned to agricultural use after decommissioning. The Scheme commits to retaining permissive access on the green lane throughout construction and the Scheme's operational phase, with an extended permissive access route to create a continuous loop provided as part of the Scheme to improve recreational functionality. The Applicant responded to the surveys undertaken by Ms Twohey as submitted as <b>[REP1-201]</b> in the <b>Applicant's Responses to Deadline 1 Submissions [REP2-050]</b>.</p>
LT-003	Scheme Description	Alternatives	In response to consultation, Ms Twohey suggested that the substation location in field AF28 was unsuitable and it should be placed in AF17 near the Broughton Road access, where it could be easily reached and do least harm visually. None of the submissions seem to have been considered, or any adjustment made of the	The Applicant has set out in <b>ES Chapter 5 Alternatives and Design Evolution [APP-042]</b> how the design process evolved following consultation. There are sensitive noise receptors located (A001 and A012) as shown on the <b>ES Figure 14.6 Sensitive Noise Receptors at Green Hill A and A.2 [APP-454]</b> which are



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>plans to take account of the use of the Quiet Lane.</p> <p>Ms Twohey suggested there is no rationale in the application to justify why the site has been selected at that location and why the fields have been selected for mitigation and what the mitigation is for. Insufficient regard was given by the Applicant to the views given in response to public consultation as this has not resulted in any significant alteration to the plans for the layout on Site A.</p>	<p>located on the opposite side of Broughton Road to field AF17, which would be closer to the substation than any receptors with it being located in AF24.</p> <p>Please refer to <b>SBMP-001</b> for details on site selection and use of agricultural land, <b>ScPC-002</b> for details on use of rooftops in the <b>Applicant's Response to Relevant Representations [REP1-161]</b>.</p> <p>Further details on the design evolution of the scheme have been outlined in <b>ES Chapter 5: Alternatives and Design Evolution [APP-042]</b>.</p> <p>Please refer to comment <b>LT-007</b> below in relation to Site A impacts.</p>
LT-004	General Matters	DCO process	Ms Twohey provided comment suggesting they are not happy with the complexity of the DCO process and is not compatible with democracy. The Applicant's initial documentation produced for the public consultation was thousands of pages long with much repetition.	The Applicant notes this comment.
LT-005	Agricultural and Soils	BMV	Field AF29 is also nearly all in agricultural land classification two and is clearly BMV land where development should be avoided on it.	The Applicant has undertaken a 5-Stage Site Selection Process with a Widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area <b>Appendix 5.1 Site Selection Assessment [REP1-037]</b> in compliance with National Policy Statement



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				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 commercial feasibility and the efficiency of the transmission of electricity to the grid. The search outcome indicates that the majority of the land within the 20km search area is Grades 3 or 2 land with high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results of the Scheme.
LT-006	Transport and Access	Newland Road construction traffic	Ms Twohey questioned why construction traffic travel across Newland Road and not instead access the west of Site A from Broughton Road nearer Old village, as is planned in the operational period? This would avoid any potential closure of the Quiet Lane during construction.	The <b>Transport and Access Routes Supporting Document [REP1-167]</b> sets out the routes identified for construction HGVs which avoids Newland Road, apart from one crossing point. Construction traffic will access fields either side of Newland Road via Broughton Road as described. A range of construction traffic management are set out in section 5 of the <b>Outline Construction Traffic Management Plan Revision B [REP3-064]</b> .
<b>Comments on behalf of Catherine Wilson</b>				
LT-006	Landscape and Visual Impacts	Site A impacts	Comments raised concern that the Scheme will negatively affect the rural landscape. Site A will completely change Green Lane and Newland Road. As a designated quiet lane, it is safer for	The LVIA <b>[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



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>walkers. By year 15 the Applicant claims visual impact will be reduced to 'not significant'; this cannot be true. For over a decade the panels will dominate any views over the landscape. When the planting has matured, the road and green lane will be trapped in a tunnel with no landscape views or sense of space. This reasoning also applies to the bridleway CT3 in Hannington parish. The large area of glass at Site A north of Walgrave would dominate the view north of the bridleway and the walk towards the A43.</p> <p>The Applicant says there will be a benefit to the character of the landscape which will be left in a better condition and improved through mitigation. These are entirely subjective statements and cannot be proven.</p> <p>The Applicant uses the word 'mitigation' to bypass the real and lasting effects of the Scheme.</p>	<p>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. As planting 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>The layout of the array within Site A has pulled back from Newland Road. Panels are not proposed within AF10 or AF11 as to not have infrastructure immediately along both sides of the road, helping maintain openness along the route.</p> <p>Newland Road (TR100) passes through Site A, and in places this would allow for direct views of the array, particularly in those fields adjacent to the east of the road. Mitigation proposals include for the existing roadside hedgerows to be reinforced with irregularly spaced native tree planting and other sections to be</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>reinforced with densely spaced native tree Planting.</p> <p>The existing landscape framework of field boundary hedgerows and the occasional woodland block combined with the elevated position of the Site and the gently undulating landform would help the receiving landscape to accommodate the array in Site A with effects localised to the Site itself and its immediate context. The LVIA has robustly assessed the potential effects to users of this section of highway, identifying Major / Moderate (Significant) Adverse effects to road users until mitigation had established at Year 15, whereby effects remain Adverse, however these are no longer considered Significant.</p>
LT-007	General Matters	General	Comments suggested that the Applicant makes statements presented as facts but are entirely subjective, has bias towards the Scheme and cannot be proven.	The Applicant notes this comment.
LT-008	Development Consent Order	Project Lifetime	The Applicant states that the development is not permanent, however 60 years cannot be considered temporary.	The Scheme is not permanent. The Scheme is for a period of up to 60 years operational life. At which point, the development will be required to be decommissioned. This is secured through Requirement 21 in Schedule 2 to the <b>draft DCO Revision C [REP3-024]</b> which states that decommissioning must be no later



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				than 60 years from the date of the final commissioning.
LT-009	Ecology and Biodiversity	Animal conservation	<p>The Applicant states the Scheme will benefit animals such as polecats, but these animals inhabit woodland, lowland marshes and riverbanks, not farmland with solar panels.</p> <p>Additionally, the cabling route running southeast of Huntington towards the A43 cuts straight through the conservation areas of ponds, created for great crested newts by the Freshwater Habitats Trust.</p>	<p>The interested party advised that a plan will be submitted at Deadline 3 showing the route of the cable cutting through the habitat of great crested newts. The Application will respond to this point after reviewing the submitted plan.</p>



## 2.8 Chris Robinson

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CR-001	Development Consent Order	Project lifetime and cost	Mr Robinson suggested that the Scheme is the wrong deal in the wrong place with the wrong company. If the Scheme goes ahead, there need to be guarantees to support the promises made. The company is a fully owned shareholder company and is a front. It has effectively no balance sheet and is doing the project on an overdraft backed by certain investors. It is a purely speculative company making promises for the next 60 years. This is not sustainable. Applicant will just keep refinancing; landowners need to take the financial responsibility.	<p>The <b>Funding Statement (Revision A) [APP-020]</b> demonstrates the Applicant's understanding of costs and ability to secure the funding necessary to deliver the Scheme as consented if the DCO is granted. The Applicant must provide a guarantee or other security, approved by the Secretary of State, under article 48 of the <b>draft DCO Revision C [REP3-024]</b>.</p> <p>For further information on the funding and the delivery of the Scheme please see the response to 'GEN-004' in the <b>Applicant's Responses Relevant Representations [REP1-161]</b>.</p> <p>The DCO is a statutory instrument that is personal to the Applicant (referred to as the 'undertaker' within the DCO. The powers in the DCO and the obligations, including to maintain, operate and decommission the Scheme, rest entirely with the Applicant. No landowner will become responsible, financially or otherwise, for the Scheme.</p>
CR-002	Development Consent Order	Project lifetime and cost	Mr Robinson suggested a request for a performance guarantee from the Applicant to cover the full cost as issued by a major UK bank and should be in favour of the local communities.	See response CR-001 above.





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CR-003	Development Consent Order	Project lifetime and cost	<p>Mr Robinson raised that property developments typically include a section 106 agreement, which is dependent on the landowners. Most land is leased to the Applicant but financial responsibility would reside with the landowners.</p> <p>The amount that would need to be secured in a s106 agreement is large and should include the community fund. Roads will need to be upgraded for HGV traffic to a minimum of a two-lane road for at least 13 miles which would be a cost of £104 million. This should be guaranteed under a s106. The Applicant needs to put a guarantee in place to put these upgrades in place before commencing development.</p> <p>Some portion of the Scheme output, such as 10%, should be given to the local community, such as lowering electricity bill.</p>	<p>The DCO is a statutory instrument that is personal to the Applicant (referred to as the 'undertaker' within the DCO. The powers in the DCO and the obligations, including to maintain, operate and decommission the Scheme, rest entirely with the Applicant. No landowner will become responsible, financially or otherwise, for the Scheme.</p> <p>The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations. Mr Robinson's suggestion of contributions towards electricity bills will be considered alongside the other feedback received.</p> <p>The routes that HGV movements will take are defined in the <b>Transport and Access Routes Supporting Document [REP1-167]</b>. The routes utilise primary roads from the Strategic Road Network and other designated routes such as routes that are preferred for industrial access. Local roads will be required to access individual sites. The overall length of local roads across these routes is minimised wherever practicable.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The use of highways for the Scheme and any highways works required will form part of the Operational and Construction Traffic Management Plans, which will be agreed with the local planning authorities under the DCO (requirements 15 and 16 in Schedule 2 of the draft DCO. Outline plans form part of the application ( <b>[REP3-064]</b> and <b>[REP1-157]</b> ).
CR-004	Development Consent Order	Legislation	Mr Robinson suggested that the DCO should be contingent on future government legislation around ensuring local communities gain benefits from such projects. The DCO should provide for the Applicant to meet all future legislation, not just current legislation.	The DCO application, consistent with any planning application made under the Town and Country Planning Act 1990 , is considered and assessed against the national and local planning policies applicable at that time. A DCO is a statutory instrument, a form of government legislation, which binds the Applicant. Future legislation, such as to provide for a mandatory community benefit fund, will set out if and how it would apply in relation to any existing projects, whether consented by a planning permission or a DCO.
CR-005	Ecology and Biodiversity	BNG	Mr Robinson queried the BNG units in the Applicant report and suggested this should be reviewed by an independent party. The Applicant should be buying various additional units to offset the costs. The cost of this is likely to be in the region of £20-25 million. The DCO should specify that at least a certain number of BNG units offsite will be bought. This makes the Scheme	Biodiversity Net Gain is not yet mandatory for Nationally Significant Infrastructure Projects; nonetheless, the Applicant has committed to delivering a minimum 10% net gain through the Scheme. As detailed in <b>Environmental Statement Appendix 9.13 Biodiversity Net Gain Assessment (Revision A) [REP1-043]</b> , the Biodiversity Net Gain metric completed for the Sites



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			uneconomic, especially as quality farmland is being used rather than brownfield. Sywell reservoir and country park is an AONB and should be protected and any impacts to the environment should be compensated for as the Scheme is within seven miles of Sywell reservoir. The Applicant should purchase land to offset effects on this.	<p>concludes a significant net gain in habitat, hedgerow and watercourse units (with all exceeding the +10% net gain threshold). As such, no purchase of additional offsite biodiversity units is required to meet the biodiversity net gain requirements of the Scheme. It should also be noted that the BNG hierarchy provides that enhancement and creation of BNG onsite is to be preferred before the allocation of offsite BNG or the purchase of biodiversity credits.</p> <p>An ecological impact assessment has been undertaken to identify potential impacts on Sywell Reservoir and Country Park Local Wildlife Site, which is provided in <b>paragraphs 9.9.52 - 9.9.64</b> of the <b>Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]</b>. The outcome of this assessment was that, following the implementation of embedded mitigation measures, no significant adverse effects on this designated site with regard to ecology and biodiversity were anticipated as a result of the construction or operational phases of the Scheme. The Applicant clarifies that Sywell Reservoir is not designated as an AONB.</p>
CR-006	Flood Risk and Drainage	Flood Risk assurance	Mr Robinson suggested that flood risk insurance should be provided by the Applicant and secured in a s106 agreement	The Applicant notes the Interested Party's suggestion that flood risk insurance should



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			as the Scheme is clearly increasing flood risk in the local area.	<p>be provided by the Applicant. The Applicant respectfully disagrees with this suggestion.</p> <p>Flood risk is considered through the detailed assessment and mitigation set out within <b>ES Chapter 10: Hydrology, Flood Risk and Drainage [REP1-023]</b> and the Flood Risk Assessment and Drainage Strategy suite <b>[REP1-024]</b>, as referenced in the response to 'MC-001' and 'MC-002'. These documents demonstrate that the Scheme will not increase flood risk to third parties and that appropriate mitigation is embedded within the design.</p> <p>The implementation of mitigation measures will be secured through the Development Consent Order and associated management plans, including the <b>Outline Construction Environmental Management Plan [REP1-131]</b> and the <b>Outline Soil Management Plan [APP-550]</b>. This provides an appropriate and proportionate mechanism for ensuring there will be no increase in flood risk in line with policy and practice.</p>



## 2.9 Angela Parker

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AP-001	Transport and Access	Site selection	Ms Parker raised concern around the burden of the Scheme which falls too heavily on Mears Ashby. Nine villages in total would be affected yet Mears Ashby takes on one third of the burden. In Mears Ashby, there are almost no facilities, with no bus services and no proper walkways, so often can only drive to places; the Scheme will make transport much more difficult. The Scheme will affect countryside views from four of the five roads to and from Mears Ashby, which will be affected by temporary traffic lights and make residents' lives a lot harder.	The Applicant's site selection process, including a search for suitable brownfield land, has been undertaken and presented as part of <b>Appendix 5.1 Site Selection Assessment Revision A [REP1-037]</b> of the <b>Environmental Statement. Chapter 5 Alternatives and Design Evolution [APP-042]</b> of the Environmental Statement explains in further detail the alternatives that were considered and the design evolution process for the Scheme. The Applicant also addresses brownfield and rooftop developments in Section 7.3 of the <b>Statement of Need [APP-556]</b> , in particular the constraints and limitations of rooftop solar and the benefits of transmission grid connected solar. In addition, NPS EN-3, paragraph 2.10.10, notes that up to 70GW of solar deployment is expected by 2035, made up of a combination of rooftop and ground mounted solar such as the Scheme.
AP-002	Design and Alternatives	Site Selection	Ms Parker noted that there should be an obligation for panels on warehouses to host solar and not good farmland. The warehouses in the area do not have any burden. Allowing developments such as the Scheme will negate the impetus for	Please refer to the response to ALT-002 and SAMP-004 in the <b>Applicant's Responses to Relevant Representations [REP1-161]</b> with



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			change to require new builds and warehouses to put solar on their roofs.	regard to use of rooftops and the site selection assessment.
AP-003	Socioeconomics, tourism and recreation	Community event	Ms Parker noted that the annual balloon festival will be affected by the solar panels.	<p>The Northampton Balloon Festival has also not been assessed as it is located primarily within Northampton's urban area. The Scheme is most likely to be visible during balloon flights but is likely to be a landscape feature rather than interrupting the ability for the event to take place or run.</p> <p>Should balloons travel towards the Scheme during events due to wind direction, there are sufficiently available alternative fields around or interspersed within the Sites (for example where array areas have been set aside for mitigation), where balloons could land if required.</p>
AP-004	Ecology and Biodiversity	Hedgerow maintenance	Ms Parker questioned who will maintain the hedgerows once Applicant sells the Scheme on. There are no guarantees that they will be maintained.	<p>An operations and maintenance contractor would be employed to maintain the solar infrastructure as well as manage the habitats within the Sites for the duration of the operational phase of the Scheme, as per the approved management plan documents.</p> <p>Details of the management and monitoring of retained, created and enhanced habitats are provided in the <b>Outline Landscape and Ecological Management Plan [REP3-062]</b>. These</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>measures would be secured through <b>Requirement 7 - Landscape and Ecological Management Plan</b> in Schedule 2 to the <b>draft DCO Revision C [REP3-024]</b>.</p> <p>As set out in the <b>Outline Skills, Supply Chain and Employment Plan [APP-552]</b>, the Applicant will take measures to maximise benefits to local businesses and the approach to procurement for the Scheme will take into account the objective of maximising benefits to local firms.</p>



## 2.10 Serien Partridge

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SP-001	Arboriculture	Woodland protection	Ms Partridge raised concerns for the woodland on her land which has much sentimental and historical value. The Scheme has caused stress, upset and mental health issues to her and her family. National Grid pylons run through the land but does not affect the arable farmland. There is a distance of 15 metres from the final pylon to the woodland. National Grid have said that work is not safe to be carried out within 5.8m of pylons. The problem is the Scheme needs to put a haulage road, construction work, the trench and equipment in this area, and there is no way this will be possible within the nine-metre gap remaining, so the woodland will have to be destroyed. The pylon that is relevant is reference ZA284.	<p>The Applicant is in the process of arranging a meeting with this Affected Party in the near future to explain further details on the potential construction activities in this area. The Applicant will be providing further details as to the construction activities likely to occur in this area at Deadline 4.</p> <p>The gap between the woodland (reference W0085) and the nearest pylon is greater than 40m. The working area is therefore greater than the raised concern suggests.</p>
SP-002	Development Consent Order	Cable Trenching	Ms Partridge noted that an agent from Berrys, the Applicant's land agent, harassed Ms Partridge and said the cabling trench will be "one metre deep and six inches wide" so it won't be a problem, and said that it would be her choice which access point the Applicant will take.	The Applicant has checked its records and confirms that no agent instructed by the Applicant has spoken to Ms Partridge since the request for surveys in October 2024. The Applicant understands that a third-party agent has approached Ms Partridge in regard to the comments made at the hearing. The Applicant understands that a third party agent acting for the joint landowner approached Ms Partridge, seeking to also represent her. The Applicant apologises for any confusion and for any distress caused. It will continue to work with Ms Partridge to





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>provide further information in relation to the potential construction activities on her land.</p> <p>The Applicant will continue to work with Ms Partridge and provide all the information as requested.</p>
SP-003	Development Consent Order	Woodland protection	Ms Partridge questioned whether the Applicant could confirm what the land agent said and whether the woodland will be affected?	The Applicant confirms that woodland referred to by the Affected Party is outside of the Order Limits. The Applicant is arranging a meeting with Ms Partridge to provide further details on the potential construction activities and how effects to the woodland will be avoided.



## 2.11 Gary Elliott

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
GE-001	Human Health	Mental health and financial burden	<p>Mr Elliott is appalled that solar panels will be in view of his farm and he is suffering from deep depression as a result.</p> <p>In reference to the submissions made by Mr Robinson, Mr Elliott now believes that the landowners who are leasing the land to the Scheme do not realise the financial burden they may have.</p>	<p>NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments (NPS EN-1 para 5.10.5 &amp; 5.10.13)</p> <p>The Applicant has undertaken a thorough and robust LVIA which has considered effects from visual receptors within a 2km radius of the Scheme. As per Table 8.14 of the LVIA [APP-045], it is anticipated that due to the screening effects of proposed mitigation, post Year 15 the Scheme would not result in significant effects to residential receptors.</p> <p>The assessment of mental health effects in <b>ES Chapter 18: Human Health [APP-055]</b> is undertaken on the basis on multiple factors including changes to views affecting community identity and sense of place. However, this assessment assesses broad effects on population groups and subgroups, not individuals. As is required for the EIA, the assessment covers the construction, operation and maintenance and decommissioning phases of the Scheme and has not temporally covered the pre-application and DCO process. However, the Applicant has provided sufficient consultation and information during the pre-application period to allow members of affected communities to have access to an accurate description of the</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>likely impacts the Scheme will have upon them, albeit based on the likely worst-case scenarios required to be assessed.</p> <p>The Scheme design incorporates substantial landscape screening (dense linear tree planting) to minimise long-term visual effects from Mr Elliott's property.</p> <p>The Applicant does not wish to misrepresent the seriousness of potential mental health concerns, and as such recommends that Mr Elliott seeks support from local mental health services, such as Mind Northamptonshire, or through his GP.</p> <p>Please also refer to the response to CR-001 which confirms landowners will not be financially responsible for decommissioning the Scheme.</p>
GE-002	Agriculture and Soils	Farmland and Food security	Mr Elliott noted that the farmland should not be used for the Scheme. Mears Ashby land is grade 2 farmland. Site B is arable land and has been producing produce for over 50 years. There cannot be a lot of difference between grade 3A and grade 3B land, except one is heavier and one is lighter land, but both have arable benefits. Food production will be heavily impacted; in 25 years' time, the UK will have to import 25% more of its food. For the last 10 years, the UK has been only 60% self-sufficient for food, and this will be reduced to 35% self-sufficiency. This Scheme	The 1200ha land for the proposed Scheme only represents 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK therefore it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			will make it worse. The Scheme should put the panels on rooftops instead.	<p>quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security.</p> <p>UK Food Security Report 2024 indicates that the 6.0 million hectares of the croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%.</p>
GE-003	Agriculture and Soils	Farmland and Food security	Mr Elliott suggested that the Applicant's argument that sheep grazing could take place under the panels on the Scheme is wrong; this will never work as the landowners won't bother with it. The Applicant won't employ a shepherd and Tithe Farm buildings are now offices so there is nowhere for a farmer to work from.	Sheep grazing at solar farm is actually growing for dual-purpose land use and there are successful examples such as the following noted in Pembrokeshire (Ref.1).
GE-004	Agriculture and Soils	Farmland and Food security	Mr Elliott indicated that Site B must be BMV land. There is 65% BMV land across the Scheme.	As outlined in ES <b>Chapter 20: Agricultural Circumstances [APP-057]</b> 41.9% of farmland of Site B is BMV land and the rest is non-BMV land.



## 2.12 Shelia English

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SE-001	Design and Alternatives	Site Selection	Ms English submitted that the Scheme is in the wrong place; should be on brownfield land.	Please refer to the response to ALT-002 and SAMP-004 in the <b>Applicant's Responses to Relevant Representations [REP1- 161]</b> with regard to use of rooftops and the site selection assessment.
SE-002	Transport and Access	Olney construction traffic	<p>Ms English raised concern that the Scheme will cause much congestion, which is already a problem in Olney, and troubles with crossing the road.</p> <p>Ms English questioned how many of the two million panels and traffic will be coming through Olney?</p>	The routes that construction vehicles will take are defined in the <b>Transport and Access Routes Supporting Document [REP1-167]</b> . The routing plans contained within Appendix A of that document identifies that HGV movements will not pass through Olney. Construction worker trips may pass through Olney. Abnormal Loads may also be transported through Olney subject to later route approvals with the relevant authority and these will be low in number – currently expected to total 4 across the construction phase for the Scheme.



## 2.13 Shena Howell

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SH-001	Design and Alternatives	Site Selection	Ms Howell submitted that the Scheme is located in the wrong place. Compton Estates owns thousands of acres in the area; they could use other sites for the Scheme instead. One site, known locally as 'The Links', used to be a golf course and should be used instead. The Applicant should consider removing fields FF10, FF11 and FF19 from Scheme so that the historic and beautiful, ancient hamlets will not be surrounded by an industrial installation of steel and glass.	<p>Please refer to the response to ALT-002 and SAMP-004 in the <b>Applicant's Responses to Relevant Representations [REP1- 161]</b> with regard to site selection assessment.</p> <p>'The Links' – referring to the pre-1950s golf course between Castle Ashby and Easton Maudit was not identified as an area that was more environmentally suitable than the Sites included in the Order Limits, nor made available during landowner negotiations.</p>
SH-002	Design and Alternatives	Construction impacts on horses	<p>Ms Howell noted that the accompanied site visit on 11 December in Grendon was planned to visit a local farmer whose land will be impacted by compulsory acquisition. The visit did not occur because there was a health and safety concern as the retired horses in the field may have been spooked by hi-vis jackets. In earlier discussions about the horses, there had not been any request to remove them from the field. The farmer was left waiting for the visit for some considerable time.</p> <p>Ms Howell expressed concern that during construction, there will be many more workers in hi-vis jackets piledriving into farmland, which would then spook horses in the vicinity.</p>	<p>The Applicant regrets that the accompanied site visit did not visit the field adjacent to Green Hill BESS This decision was undertaken as the Examining Authority had stated they were able to see the location from the adjacent field, and chose not to go into the field that had the horses within. A health and safety concern was not raised at the time on the site visit and was not communicated to the Applicant. The Applicant rang the landowner and spoke to him and a family member to advise them that the ExA would not be visiting the field.</p> <p>During construction, anticipated effects on horses and equestrian facilities have been assessed in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation</b></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<b>[APP-054] and its appendix (Revision A) [REP1-079]</b> . No significant adverse effects are anticipated as these are able to be mitigated against. Furthermore, construction will not take place in fields that contain horses, as notice will be given to landowners or tenants to clear fields of livestock ahead of construction works (such as cabling works in this instance) to ensure worker and animal safety is preserved.
SH-003	Major Accidents and Disaster	Fire Risk	<p>Ms Howell questioned what would be the result if the BESS caused a fire in Grendon. The substation is part of the major strategic electricity distribution for a large part of the Midlands and North London and plays a major role in the National Grid WMEL upgrade for the Midlands. Any disruption could cost millions of pounds. A BESS fire would cause health issues.</p> <p>Ms Howell also noted that they are awaiting a response from the Applicant on a question raised during Issue Specific Hearing 2, as to what would be the result of a fire adjacent to the irreplaceable ancient woodland near Mears Ashby should the BESS there cause a fire.</p>	<p>Section 2.4 of the Applicant's <b>Outline Battery Storage Safety Management Plan (OBSSMP) [REP1-143]</b> lists the safety objectives for the design of the two BESS areas. These are:</p> <p>To minimise the likelihood of a failure event. This is an overriding priority;</p> <ul style="list-style-type: none"><li>• To minimise the consequences should an event occur;</li><li>• To restrict any event to the BESS site and minimise any impact on the surrounding areas;</li><li>• To automatically detect and begin to fight a fire as soon as possible;</li><li>• To ensure any personnel on Site are able to escape safely away from the Site;</li><li>• To ensure that firefighters can operate in reasonable safety where necessary;</li></ul>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<ul style="list-style-type: none"><li>• Final BESS design and site layout should minimise the requirement for direct NFRS intervention in a thermal runaway incident i.e. direct hose streams or spray directly on BESS battery systems. NFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy should be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP);</li><li>• If the BESS system does not incorporate an automatic fire suppression system and is designed to safely burn out to remove the risk of stranded energy in the battery systems, then full scale free burn testing will have been conducted to demonstrate that loss will be safely limited to one container without the intervention of the NFRS;</li></ul> <p>2.4.2 Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. NFRS intervention in</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>worst case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP):</p> <ul style="list-style-type: none"><li>• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</li><li>• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.</li></ul> <p>Credible Firefighting consequences are documented in Section 5.5 of the OBSSMP.</p> <p>The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Section 6 of the OBSMP specifies key Pre-Construction requirements and risk assessment tools which must be utilised.</p> <p>In the event of a BESS fire, any firewater generated would be managed as part of the BESS drainage and containment strategy. The BESS areas are designed with sealed and lined drainage infrastructure to ensure that firewater runoff is fully contained within the site. Firewater would be isolated, stored and tested as necessary, and would not be permitted to discharge to ground, surface waters or the wider drainage network without appropriate treatment or removal.</p> <p>Where required, contaminated firewater would be removed by tanker for offsite treatment or disposal at a suitably licensed facility. These measures ensure that firewater arising from a BESS fire would not result in offsite pollution or secondary environmental effects.</p>



## 2.14 Cllr Jon-Paul Carr

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
JPC-001	Landscape and Visual Impacts	Visual Impacts	<p>Cllr Carr stated that the Scheme is devastating to the local area landscape. The Scheme changes our sense of belonging and the heritage of the area. It is an industrialisation of the area. This will affect mental health and visual health.</p> <p>The planned four-metre-tall hedgerows will affect the historic look of the landscape. The area will completely change.</p> <p>This Scheme is life-changing to local communities; it will really hinder local lifestyles.</p>	<p>The LVIA <b>[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. As planting 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. However, NPS EN 1 recognises that impacts and effects are likely to be experienced with large scale ground mounted solar developments (NPS EN-1 para 5.10.5 &amp; 5.10.13)</p>
JPC-002	Flood Risk and Drainage	Flood Risk	<p>Cllr Carr noted that the places like Grendon and Eastern Maudit have suffered from flooding in recent years, which will be made worse due to the panels. The soil in this local area makes</p>	<p>The Applicant notes <b>Cllr Carr's</b> statement that existing flooding within the ward would be made worse by the Scheme.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			flooding a high risk in this area. Industrialisation in this Scheme will impact the soil and have much concrete, which will make the flooding risk worse.	<p>The Applicant's position on flood risk, including the assessment undertaken, the evidence base, and the conclusions reached, is set out in the responses to <b>MC-001</b> and <b>MC-002</b> above. Those responses demonstrate that the Scheme has been designed to ensure no increase in flood risk to third parties, with post-development runoff controlled to greenfield or better.</p> <p>No technical evidence has been identified to indicate that the Scheme would exacerbate existing flooding within the ward.</p>
JPC-003	Socioeconomics, tourism and recreation	Loss of farming jobs	Cllr Carr raised concern that the Scheme will take land from tenant farmers making their farms unsustainable, which may result in their farms being given up or taken into one large farm, changing the ethos and community in the local area.	<p>Please refer the response 'SOC-005' in <b>The Applicant's Responses to Relevant Representations [REP1-161]</b>.</p> <p>For farms which are owner-occupied, ground rent paid to them from the Scheme will provide them with a secure income over the operational life of the Scheme which will be consistent and resilient compared to the yields from crops which can be adversely affected by adverse weather conditions.</p>
JPC-004	Development Consent Order	Community Benefit Fund	Cllr Carr suggested that the lack of a commitment to the community benefit fund is a problem. This needs to be guaranteed.	The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			There are examples of local projects where the community benefit promises were not followed through.	of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations.  In terms of the Applicant's commitment, refer to the response to PM-001 above.
JPC-005	Socioeconomics, tourism and recreation	Tourism industry	<p>Cllr Carr raised concern for effects on the tourism industry; there are various local tourism attractions and they and the journeys to and from these will be affected. There is a cultural master plan for tourism for the local area</p> <p>Cllr Carr provided examples of two solar projects near Irchester. For one solar farm, the landscaping has failed; he has concerns this will happen to the whole of the Scheme. The second solar farm is behind Little Irchester and is not visually seen from the road, used poor-quality farmland and land which had previously been a quarry and later infilled. For both projects, the community benefit payments have not been paid or have ceased after the project was sold on.</p>	<p>The Applicant confirms a full assessment of tourism destinations, PROWs, and recreational facilities is set out in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> and its <b>appendix (Revision A) [REP1-079]</b>. Significant adverse effects are largely able to be mitigated against, with the exception of long-distance recreational routes during the Scheme's construction and decommissioning, due to their level of importance.</p> <p>The impact of the Scheme on tourism and recreation is anticipated to result in a temporarily halt of up to 29 FTE jobs dependent on leisure, tourism and visitor spending during construction, and estimated to have a long-term loss of 10 tourism-dependent jobs during its operational lifetime.</p> <p>The Applicant is confident that the Scheme does not conflict with the aims and objectives of the draft North Northamptonshire Cultural Masterplan as</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>presented to the Council's Executive meeting on 15<sup>th</sup> July 2025.</p> <p>Please also refer to the responses to 'JPC-001' and 'JPC-004'.</p>
JPC-006	Development Consent Order	Supply Chain	Cllr Carr suggested the Scheme supply chain is not environmentally friendly, yet a solar farm should be working toward cleaning up the environmental problems.	<p>Please refer to the Applicants response to matter 'SOC-011' and 'OEM-003' in the <b>Applicant's Response to Relevant Representations [REP1-161]</b> for details on the supply chain and lifecycle of materials.</p> <p>The Applicant can confirm that Island Green Power, the parent company of the Applicant, is a signatory of the Solar Energy UK supply chain statement, and a member of the international Solar Stewardship Initiative, which both commit the company to a transparent, sustainable supply chain free of human rights abuses when sourcing the panels. Paragraph 5.4.7 of the <b>Outline Skills Supply Chain and Economic Plan [APP-552]</b> states that <i>"All international suppliers will be held to a minimum quality with regard to professional and ethical working practices as agreed by the members of Solar Energy UK."</i> The Applicant confirms that a detailed Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to the <b>draft DCO Revision C [REP3-024]</b>.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Failure to comply with any Requirement is a criminal offence.



## 2.15 Keith Burrell

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KBL-001	Glint and Glare	Sywell Aerodrome	<p>Mr Burrell introduced himself as ex-RAF, working for the Civil Aviation Authority and National Air Traffic Services, and a resident local to Site B. He raised concerns that Applicant has not had regard to the impact on surrounding airspace users.</p> <p>Sywell Aerodrome will be affected. There is an absence of glint and glare modelling outside of the Safeguarding Aerodrome Guidance addition to CAP738. Not every flight will be departing from the airfields mentioned in PEIR Volume 3: Chapter 15. The Applicant has no understanding nor mentions of airspace, flight paths, local air sites, visual flight rules (VFR) and the low air zone. The importance and significance of VFR for low-flying and light aircraft, including military movements, was emphasised, noting also that commercial flights pass the area at around 10-11,000 feet when approaching Leicester Airport. Pilots will not be able to avoid the large geographical area of the Scheme and multi-site installations of panels.</p> <p>The Scheme will change the landscape, relevant as local landmarks such as Sywell reservoir are used for navigation purposes. The glint and glare from a wide geographical area may require Notices to Airmen (NOTAM) to be issued. This is challenging due to</p>	<p>Glint and glare modelling has been undertaken for all aerodromes within 5km of proposed solar panels, as advised in aviation industry guidance. Neither the CAA nor the MoD require or advise modelling of the potential effects of glint and glare on air traffic in the en route phase of flight and there is no evidence from incident or accident data that glint and glare from solar PV installations is a safety hazard for en route traffic, whether this is commercial aircraft at 10-11,000 feet or civil and military aircraft at lower altitudes.</p> <p>From information available; it is understood that the Red Arrows last displayed at Sywell in June 2024 and prior to that in 2019. A planned display in 2020 was cancelled due to the pandemic. There is no Sywell air show planned for 2026 but there may be one in 2027. Notwithstanding issues related to the frequency or regularity of such events, there is no evidence that glare from solar PV installations may cause adverse safety effects on pilots of aircraft engaged in low level formation aerobatics. Within danger area D324A – the designated Red Arrows training airspace around their base at RAF Waddington in Lincolnshire – there are two operational solar farms (Branston and Branston Extension) and one proposed</p>





Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>variability in glare from the different times of day, flight paths and headings, panels used, and anti-glare coatings. The Applicant has not set out how deterioration of such coatings will be monitored. The glare may lead to collisions if visibility of other aircraft is affected. Even a small degree of glare may be significant once it is amplified across thousands of panels.</p> <p>If the Applicant does not mitigate these risks, air events, such as the red arrows event from Sywell Aerodrome, may not be able to take place.</p>	<p>800MW solar farm (Springwell). In all three cases the planning authority considered potential glare effects on aviation safety and consulted the Ministry of Defence. In all three cases there was no objection on glint and glare grounds from the Ministry of Defence.</p> <p>It should also be noted that there is an existing solar farm adjacent to Sywell Aerodrome, at Sywell Road, and solar panels on the roofs of Blocks A and B of the Brooklands Technology Park on Sywell Aerodrome. There is no evidence that these installations have generated any adverse glint or glare effects on aircraft.</p> <p>It is noted that further modelling of Sywell Aerodrome has been undertaken since the PEIR stage of the application. This can be found in <b>ES Appendix 15.11 Sywell Aerodrome Aviation Receptor Results [APP-165]</b> and is summarised in <b>ES Chapter 15 Glint and Glare [APP-052]</b>.</p>
KBL-002	Major Accidents and Disasters	Engine Failure	<p>In the event of an engine failure after takeoff, whilst an aircraft is doing a circuit, currently a pilot has a chance of putting the aircraft down in farmland. the Scheme will take away a large portion of the surrounding countryside. This will reduce the chances of walking away from an incident without injury or death. The panels</p>	<p>The potential for the development to remove forced landing options for single-engined aircraft taking off from runway 05 at Sywell and runway 16 at Easton Maudit was recognised by the Applicant in the pre-application stages. Following Statutory Consultation the Applicant revised the proposed layout of the solar farm in order to</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>pose an electrical risk to people trying to move away from a crash.</p> <p>There may also be difficulties for the fire services to access a crash location within the Scheme.</p>	<p>address potential issues with forced landing options for single engined aircraft suffering an engine failure after take-off from runway 05 at Sywell Aerodrome and runway 16 at Easton Maudit airstrip. Solar panels have been removed from those areas in order to maintain safe forced landing areas. These layout changes have been approved by the operators of the aerodromes concerned and is recorded in table 5.9 of the <b>Environmental Statement Chapter 5: Alternatives and Design Evolution [APP-042]</b>.</p>



- Ref.1 James, D. (2022) How solar panel diversification is working for a sheep enterprise. Farmers Weekly. Available at: <https://www.fwi.co.uk/livestock/how-solar-panel-diversification-is-working-for-a-sheep-enterprise>