STOP GREEN HILL SOLAR

RESPONSES FURTHER TO REP3-074; GH8.1.19 (APPLICANTS RESPONSES TO ExA SECOND WRITTEN QUESTIONS)

The Examiners are requested to note that Stop Greenhill Solar has responded to the following points.

- Q2.1.3 relating to the updated National Policy Statements for energy infrastructure.
- Q2.1.4(a) (b) both relating to BESS imports.
- Q2.1.5 relating to BESS emergency response plan
- Q2.7.7 about comparisons with the Llanwern solar scheme (re-submitted for completeness)
- Q2.7.8 about the bat study methodology (re-submitted for completeness)
- Q2.11.2 relating to the registered Park and Garden of Castle Ashby
- Q2.12.1 on Land use, agriculture and soils (an observation SHGHS wishes to submit).
- Q2.13.2 regarding Mitigation planting (re-submitted for completeness)
- Q2.13.4 on cumulative impacts
- Q2.13.8 on LVIA methodology (re-submitted for completeness)
- Q2.13.10 about the effect on local roads
- Q2.16.4 about access to construction compound 4.
- Q2.16.10 about public access to the countryside and perceptions of safety (re-submitted for completeness)
- Q2.17.1 relating to Environment Agency updated flood mapping dataset.

The examiners are requested to note that these responses have been compiled by Stop Greenhill Solar group. They are not the result of any input from Artificial Intelligence (AI).

2.1 General and Cross-topic Questions.

ExQ	Respondent	Question	Applicant's Response	SGHS Comments
Q2.1.3	Interested Parties	**Updated National Policy Statements for energy infrastructure:** However, is there anything in the updates to EN-1, EN-3 and/or EN-5 that you consider might be material in relation to the Green Hill Solar Farm Application		SGHS wishes to comment: The Planning and Infrastructure Bill, introduced in 2025, will bring changes to the Nationally Significant Infrastructure Project (NSIP) regime, notably to the consultation requirements, aimed at ensuring quicker delivery of infrastructure projects. No changes are currently proposed to the content of Environmental Impact Assessments (EIAs) for NSIPs. However, The Institute of Sustainability and Environmental Professional (ISEP) have noted inconsistencies in approaches taken by developers in EIAs and have recently published new best practice guidance. SGHS would expect the applicant to review their EIA in line with this new guidance (***Solar PV on Agricultural Land – Essential Components of Environmental Assessments and Reports*** - by ISEP dated 12th January, 2026). In addition, The Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) continue to state that where the proposed use of any agricultural land has been shown to be necessary, poorer-quality land should be preferred to higher-quality land **(avoiding the use of BMV land where possible)**. While the development of ground-mounted solar arrays is not prohibited on BMV land, **the impacts of such are expected to be considered.** Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low- and medium grade agricultural land.

Q2.1.4(a)	The Applicant	**Importing electricity to the Battery Energy Storage System.** …Roughly what proportion of the time during operation do you envisage the scheme would be importing from the NETS rather than exporting electricity to the NETS?	All of the infrastructure necessary to deliver the Scheme, including the import and export of up to 500MW of power, has been fully assessed in the Environmental Statement (ES).	SGHS wish to comment: This is factually incorrect as there is currently no detail at all as to the infrastructure of the BESS. Not the locations, not the MwH in total or by location, not the number or size of containers, not the spacing of the containers, crucially not the chemical contruction within each container. There has been no consultation with HSE to determine whether HSC (Hazardous Substances Consent) is necessary. In fact in answer to Q2 1.7 to the applicant about the requirement for HSC The applicant responded **the Applicant confirms that it is not typical for BESS installations to require hazardous substances consent, however this cannot be confirmed until the detailed design of the BESS has been carried out.** The applicant then continues to cite the Sunnica NSIP DCO ruling as if it were best practice **"The Secretary of State … agrees that there is no requirement to obtain Hazardous Substance Consent in advance of receiving development consent. The Applicant is not requesting that the Secretary of State himself make a decision to deem hazardous substances consent within the DCO. The Secretary of State has been given no reason to believe that Hazardous Substances Consent will not be granted by the HSE at the relevant time."** SGHS comment further: The reality of the situation is that Sunnica have still not commenced development post DCO consent some 18 months ago as there is a continuing legal dispute around the need for obtaining HSC which should have been contained within the DCO!

				We are in the early stages of these huge NSIP solar developments and should be trying to improve the quality and standards in any DCO, not merely repeating the mistakes of the early adopters.
Q2.1.4(b)	The Applicant	**Importing electricity to the BESS**		SGHS wishes to comment further: The Applicant Response is very clear regarding the use of the BESS during the Summer months at solar insolation maximum (particularly during May, June & July) when "excess" solar power being generated over and above the grid export maximum may be stored in the batteries for export to the grid later in the day. However, the use of the BESS during the Autumn and Winter months (October to March) remains unclear as seasonal solar intermittency, variability and volatility increases and insolation levels naturally decrease in the UK, probably to around one third of summer levels on (infrequent) clear days. The Applicant's Response refers to their Statement of Need (Section 7.9 Figures 22 to 26) and the provision of "grid support" services when there may be "excess" renewable wind power generation available for import into the BESS from the grid for later export and also possible grid stabilisation services, presumably if called upon to do so by the National Energy Systems Operator (NESO). On the 7th November 2025 Ofgem / NESO issued a "Call for Information (CfI)" regarding a very large increase in projected power demand / import from the grid (totalling 125GWe of additional electrical power demand / import) that was identified by the Energy Networks Association (ENA) as shown on their public Connections Data webpage. The large majority of this additional demand (97GWe of additional power demand / import) was arising in the UK Grid Transmission Network (NGET) directly as a result of connection applications for electricity storage systems (including demand from BESS imports). Further clarification regarding this "unintended consequence" is awaited from NESO / DES&NZ. As a result of the foregoing SGHS would therefore raise the question: What safeguards and assurances will be given by the Applicant that the

				scenarios described in their Statement of Need (Section 7.9) will NOT give rise to additional (and unnecessary) import / "call" on grid electrical power demand? BESS electrical power import constraint would be required particularly throughout the UK colder Northern Winter months. At this time solar generation will be sporadic (if any at all) and wind generation would be unreliable & highly variable, subject to winter storms (low pressure depressions requiring feathering / and / or constraint to physically protect the wind turbine structures) or the opposite dunkelflaute (gloomy calm high pressure) with little wind generation (certainly no "excess / surplus"). There is therefore a significant risk that unnecessary import / "call" on grid electrical power demand from the Green Hill BESS would merely give rise to additional "dispatchable" demand from the UK fleet of 35GWe of existing combined cycle gas turbine power generation. This would clearly have the "unintended consequence" of not only increasing unnecessary "fossil fuel" electrical power generation but also increasing greenhouse gas emissions rather than reducing them (as claimed by the Applicant)."
Q2.1.5	The Applicant	**BESS Emergency Response Plan**	The involvement of the Environment Agency provides further technical expertise to ensure the measures in the management plan are appropriate. For that reason, the Applicant does not consider that any	Why would the applicant regard the Environment Agency as a useful consultee and not the HSE who are the responsible party? Having heard the expert witness Professor Peter Dobson OBE who used to run the European Nano Safety Program and who counselled caution about nano particulates of fluorides causing health risks in the event of a fire up to 10km away would the applicant not deem it prudent to seek further expert advice from the HSE? SGHS submit that the applicant should consult the Parish Council of the village housing the BESS.

			specific further consultation with named consultees is required.	

2.7 Biodiversity, ecology and natural environment

ExQ	Respondent	Question	Applicant's Response	SGHS Comments
Q2.7.7	SGHS	**Llanwern Solar Scheme:** Please outline any areas of similarity and difference between the Llanwern scheme discussed in the "Notes on Ecology aspects of Green Hill solar plans" document [REP1-218] and		Llanwern Solar Farm – 260 acres, site was part of Gwent Levels SSSI, had apparently been mostly neglected agricultural grazing land. Height of ground-mounted solar panels about 2.5 – 3 metres apparently, non-tracking. Green Hill Solar – almost 3000 acres, mostly on productive arable agricultural land. PV panels, type yet to be decided, but planning for 4.5 metre, probable tracking panels. The adverse effects on Ecology in the post-construction monitoring report on Llanwern Solar Farm include marked increases in levels of toxic pollutants, decimation of bat populations, and compaction of soil and lack of vegetation growth under panels. 1) Toxic pollutants – The Applicant in REP2 – 048 states that: 'Regular inspections and maintenance of battery storage systems and solar panels will be routinely undertaken to identify any signs of potential leakage, wear, or faults. This ensures early detection and rectification of issues, thereby minimising operational risks. Additionally, solar panels will undergo routine cleaning using water only, to prevent environmental contamination and

		the proposed development.		maintain optimal performance.' So they are actually admitting there could be problems arising from the solar panels themselves. But there is no evidence in the post-construction monitoring of Llanwern Solar Farm that the contamination was due to faulty solar panels. The onus is on the Applicant to demonstrate that there would **NOT** be any such issues, not for Stop Green Hill Solar to prove that there would be. 2) Decimation of bat populations – this is what was found in post-construction monitoring; it is not speculation. Please also see answer below to **Q2.7.8.** 3) Compaction of soil and lack of vegetation growth under the panels – The proposed Green Hill Solar development is on a much larger scale than the already developed Llanwern scheme and the proposed panels are considerably larger and probably tracking. Therefore it would be a reasonable assumption, although unproven, that the ground mountings would need deeper piling, with larger and heavier equipment required to achieve this, and the panels themselves would potentially be heavier particularly including equipment to allow tracking. So the likelihood of soil compaction in the area of solar panels is probably significant. As far as lack of vegetation growing under the panels is concerned, the Applicant states in REP2 – 050 that: 'Recommendations for the creation and management of habitats within the solar arrays is based on the findings of extensive long-term monitoring of active solar arrays by the Applicant's ecologist, providing a degree of confidence that the proposals are reasonable and practicable'.

				However, how can they claim this, as the only potentially comparable solar farm on this scale already constructed is Cleve Hill, in North Kent, which only became operational this summer 2025? Therefore there cannot be any long-term monitoring of any similar type of scheme available yet. (To get an idea of what the ground is like under the Cleve Hill development, there is a video produced by 'Hands Off Our Marsh' campaign group which clearly shows at 2 minutes, 21 seconds, that underneath Cleve Hill's massive solar panels there is mostly bare earth.) Again, the onus is on the Applicant to demonstrate that their proposed development **WILL NOT** have these effects. In conclusion, the information provided by Stop Green Hill Solar is not about comparing, we're simply showing that the construction of solar developments can lead to significant direct and indirect adverse effects on flora and fauna due to factors including waterborne pollutants.
Q2.7.8	SGHS	**Bat Study Methodology**	Please provide any comments you wish to make in response to the applicant's comments on the methodology of the bat populations study (at SGHS-005, Pages 232-3 of the applicant's Responses to Written	This paper will have been peer reviewed by expert ecologists in order to have been accepted for publication in an established journal. Therefore it will have undergone thorough scrutiny of the methodology employed. The full reference is: Tinsley E, Froidevaux JSP, Zsebok S, Szabadi KL, Jones G. Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. Journal of Applied Ecology, 2023; 60(9), 1752-1762 It is available to Open Access. As far as SGHS can establish, the height used by the Ecologists (working for the Applicant) for their static detectors was 2 metres (as opposed to the 1.27 metres in the above research). They do not state this directly in their ES document on Bat Surveys, APP-089, but they reference the method to the

			Representations at Deadline 1 [REP2-048])	Bat Conservation Trust Good Practice Guidelines which recommend this height. We are unable to comment directly on any effect of having detectors at different heights for the efficiency of collecting data. However, the Applicant in REP2-048, and also identically in REP2 -050, uses the fact that 1.27metre height might be too low in the centre of the fields with solar panels, called 'open habitats' in the paper, compared to 'boundary habitats'. The Applicant stresses that they will be creating better boundary habitats for bats along the sides of fields with solar PV. But the results in Table 1 of the paper, even if the results for the centre field detectors are discounted completely (because the detectors within panels might be unable to pick up bat activity at a different height), show that there are very marked reductions in bat activity for 6 out of 8 species along the boundary habitats where the height of the detectors and surroundings are equivalent, and so cannot be said to influence the comparison between the results. And for other species, there was no significant difference between activity in the centre of solar and non-solar PV fields. If the height of the detectors led to reduced detection in the centre of PV panel fields, it presumably would apply to all species. Green Hill Solar's Ecologists discovered very rich populations of bats on all sites, and they concluded in the Bat Survey Summary of Appendix 9.6 in the GHS ES, that 'The overall bat assemblage score for the Survey Area falls between 17 and 26, indicating an assemblage of between Regional to National importance'. In total across all the Green Hill solar sites, 47% of bats recorded were Common Pipistrelle and 42% Soprano Pipistrelle. In this research paper, at the boundary habitats, Common pipistrelle call sequences were reduced by more than a third, and Soprano Pipistrelle call sequences by more than two-thirds. So the main populations of bats across the proposed GHS

				development are likely to be very significantly adversely affected by the presence of fields with solar PV. It is also worth noting that this study's data was collected in 2019 and 2020, on much smaller solar farm developments. The effects when translated to far larger continuous cover with taller and potential tracking panels is not likely to be less significant. However, as before, the onus is on the Applicant to show that the effects on bat populations shown is this study are **NOT** relevant to their proposed development.

2.11 Historic Environment

ExQ	Respondent	Question	Applicant's Response	SGHS Comments
Q2.11.2	Historic England	**Registered Park and Garden of Castle Ashby:** will topography and proposed screening reduce the setting impact?		SGHS would like to comment: Has the Applicant considered the potential land contamination of the Grade 1 registered Park and Gardens arising from any heavy metals and fluorides dispersed due to a BESS fire? As the Park and Garden is only 50m away from the proposed site, it is well within the applicants 1km model area.

2.12 Land use. Agriculture and soils.

SGHS acknowledges that there are no questions at this time but would like to make the following observation:

ExQ	Respondent	Question	Applicant's Response	SGHS Comments
	SGHS			SGHS would like to draw the ExA attention to the latest report and guidance by Institute of Sustainability and Environmental Professionals (ISEP): ***Solar PV on Agricultural Land – Essential Components of Environmental Assessments and Reports*** - (12th January, 2026) which states: **The "best and most versatile" farmland should be protected amid rapid expansion of UK solar power"** In July 2025 CPRE pointed out that 59% of England's largest operational solar farms are located on productive farmland, principally in the arable East of England, where almost a third (31%) of the area they cover is classified as BMV agricultural land. Greenhill solar farm, if consented will be constructed on 66% BMV land! The guidance from ISEP has been issued as a result of inconsistencies in Environmental Impact Assessments for large scale solar power projects on UK farmland which prompted them to issue new advice to protect agricultural land and biodiversity, while balancing the growing demand for renewable energy" ISEP Senior Policy Lead for Impact Assessment, Dr Rufus Howard, said**:** "There is inconsistency in the approaches taken for Environmental Impact Assessments and planning applications for solar PV projects. The desired outcome of all these environmental assessment processes is to inform decision-making to assist the eventual return of farmland to agriculture in good condition"..... Recent events at Porth Wen on Anglesey, when solar panels were destroyed by strong winds, have shown that significant contamination by broken glass and chemical

				pollution can arise because of exceptional weather events that may be on the increase." The paper produces a check list of the main deficiencies in EISs produced for solar projects. • Soil/ALC surveys carried out at less than the required 100 cm sampling density and not to the required 120 cm depth (where possible) • Lack of representative soil pit descriptions to supplement auger data • Lack of reference to relevant published soil data to verify and supplement the results of the soil/ALC/ LCA surveys • Lack of identification of the potential soil contamination risks from damaged panels (including broken glass) and proposals for remediation • Incomplete assessment of the socio-economic impacts of a large-scale solar PV, such as displacement of tenant farmers and redundancy of the agricultural workforce • Lack of clarity as to how the condition of the land will be assessed after decommissioning and its suitability for farming • Lack of clarity as to how any BNG during operation might be retained on decommissioning, if the land is returned to farming. SGHS has reviewed the EIA submitted by the applicant and finds inconsistencies with the above best practice advice note.

2.13 Landscape and Visual, including glint and glare.

ExQ	Respondent	Question	Applicant's Response	SGHS Comments
Q2.13.2	The applicant	**Mitigation Planting** NNC in their LiR para 8.40 refer to the landscape and visual mitigation having been conflated and too much weight applied to the benefits of this mitigation over and above the role of screening the proposed development. In your response ref NNC 8.40-8.41 (Rep2 049) you note these comments	The Applicant has reviewed the North Northamptonshire Council Local Impact Report (LIR) [REP1-171] para 8.40 and respectfully disagrees with the ExA that NNC have suggested that the role of the landscape and visual mitigation has been conflated or that too much weight has been applied to the benefits of this mitigation over and above its role of screening the proposed development within the ES Chapter 8 Landscape and Visual Impact Assessment [APP-045].	This question was directed to the Applicant, but SGHS would like to comment on the Applicant's response because the question of whether the scheme would result in landscape benefit or harm is extremely important. It is also very important to note that mitigation is **not** benefit. Part of the Applicant's response to the question is as follows, with emphasis added: *NNC LIR [REP1 -171] para 8.41 recognises that the proposed planting and habitat creation would deliver an enhancement relative to the existing conditions and goes on to affirm that the primary function of the proposed planting and habitat creation is intended to reduce the degree of adverse change arising from the development. Whilst **this is somewhat correct**, the proposed planning and habitat creation has been carefully designed to ensure compatibility with the existing character of the landscape to allow the Scheme to build upon and to not be incongruous*. Please refer to **REP1-195**, SGHS's *Landscape and Related Matters Statement* Section 4.2, which explains the important difference between mitigation and enhancement, and why landscape / visual mitigation **cannot** be double-counted as landscape / visual enhancement (GLVIA3 para. 3.39), which is what the LVIA has done – as the above statement appears to confirm. Also, see REP1-195 paras. 2.3.2 - 13, under the heading *Landscape receptors: 'fabric'*. In summary, and to clarify:

		however, is there any further response you wish to make to NNC's concern?	NCC have referenced LITGN-2024-01 Notes and Clarifications on Aspects of GLVIA3 (August 2024), and although not directly referenced, it is assumed that this is in reference to Issue / Question 4 (3):	The matter of what the Applicant's LVIA [APP-045] calls landscape 'fabric' is relevant and important because it is central to the Applicant's claim that after 15 years of operation, the proposed development would result in **significant beneficial** effects upon the character of the sites. SGHS's landscape expert's assessment concludes that the proposed development would result in **significant adverse** effects on the character of the sites for the duration of the operation, and the effects could not be mitigated. Apart from a couple of passing references, the word 'fabric' is not used in GLVIA3. The references are i) at the 2nd bullet point of para. 7.3, this being a quotation from a 2012 Scottish Natural Heritage publication relating to cumulative effects; and ii) at the 1st bullet of para. 7.25, also in the context of cumulative effects. However, for some reason, recently, some landscape practitioners have started using the word 'fabric' in LVIA. In fact, landscape 'fabric' is just another word for what GLVIA3 and the majority of landscape practitioners call landscape 'elements'. Use of the term in LVIA is not problematic, so long as it is clearly defined, and used consistently / appropriately. GLVIA3's Glossary defines landscape elements as '*Individual parts which make up the landscape, such as, for example, trees, hedges and buildings*'. The Applicant's LVIA confirms this at para. 8.4.21, where 'fabric' is defined as '*the individual tangible elements or features such as landform, woodland, hedges, tree cover, vegetation that make up a landscape or site. These can usually be described and quantified*' (but note that 'elements' and 'features' are not the same – see GLVIA3 Glossary). The LVIA's Glossary also confirms that 'elements' and 'fabric' are the same.

				Most importantly, the terms 'fabric' and 'elements / features' are **not** interchangeable with 'character'. 'Fabric', 'elements', and 'features' merely **contribute** to a landscape's overall character (and potentially, to its distinctiveness, value, and susceptibility to certain forms of change), along with many other factors including people; place; 'tangible / quantifiable' natural, cultural, and social aspects; and 'intangible' aspects such as visual and non-visual aesthetic, perceptual, and experiential qualities. These factors – all of which should be considered in LVIA baseline studies and assessments of effects – are illustrated in Figure 1: *What is Landscape?* on page 9 of Natural England's 2014 publication *An Approach to Character Assessment*. Many of the factors of relevance to the Scheme are not included in the Applicant's LVIA, or are not factored into judgements about levels of sensitivity and effects. GLVIA3 para. 3.21 states that '*In LVIA there must be identification of… landscape receptors, including* [1] *the constituent elements of the landscape,* [2] *its specific aesthetic or perceptual qualities and* [3] *the character of the landscape in different areas*…'. GLVIA para. 5.3 states that LVIAs should '*identify and record the character of the landscape **and** the elements, features **and** aesthetic and perceptual factors which **contribute** to it*' (emphasis added). GLVIA para. 5.35 states that LVIAs should consider effects such as: • *'change in and/or partial or complete loss of elements, features **or** aesthetic **or** perceptual aspects that **contribute** to the character and distinctiveness of the landscape;* • *'addition of **new elements or features** that will **influence** the character and distinctiveness of the landscape;*

				• *'combined effects of these changes on **overall character***' (emphasis added). In the Applicant's LVIA, para. 8.4.21 states, '*All Landscape Receptors **within the Local 1km Study Area** will be included in the LVIA. This includes* [1] *the **landscape fabric of the site itself**…, **and*** [2] ***the local landscape character**…. The Landscape Fabric of the Sites themselves is considered a landscape receptor which will be assessed **separately** to the relevant Landscape Character Areas*' (my emphasis). In other words, the LVIA assessed effects on 1) the sites' 'fabric' / elements (see **REP1-041** *ES Appendix 8.3 ES LVIA Assessment Sheets (Revision A) (Clean) - Individual Site Assessments - Landscape Fabric* PDF pp. 631 – 667); and 2) the overall character of the landscapes **beyond** the sites' boundaries (same document, PDF pp 669 - 809), but did **not** assess effects on the **overall character of the sites**. This is a significant departure from GLVIA3 which, whilst only guidance, is still best practice, and such departure should be justified. Here it is relevant to note that as mentioned in SGHS's REP1-195, in REP1-041, the tables at PDF pp. 669 – 729 set out effects on landscape character within the 'local' 1km study area. LVIA para. 8.4.20 explains that the '*Local 1km Study Area… is the 1km area extending as a radius **from the outer boundary of the Sites***' (emphasis added), ie it does **not** include the sites themselves. However, confusingly, these tables are under the heading *Landscape Character - The 1km Study Area (The Local Study Area) **(Individual Sites)*** (emphasis added). The text in the tables provides information about the character of the sites as well as the landscapes beyond (although as noted in REP1-195, this information is insufficient, as it does not include all aspects of character as set out above, nor does it factor in the numerous natural and cultural

				variations in character which contribute to each discrete area's local distinctiveness and sense of place – see response to ExQ2.13.7). However, although not entirely clear, it must be the case that the tables at PDF pp. 669 – 729 only describe effects on overall landscape character within the 'local' 1km study area, and **not** effects on the overall landscape character of the sites. That is because effects on the landscapes lying within 1km of the sites' boundaries would be **indirect**, whereas effects on the sites' character would be **direct**. Levels of adverse indirect effects on character are much lower than levels of adverse direct effects: the direct effect of replacing greenfield land with development of this type **cannot be mitigated**. The LVIA concludes that at Year 15, the proposed planting would have matured, and overall effects on overall landscape character within the 1km study area (which the LVIA confirms does not include the sites themselves) would be **Moderate / Minor Adverse**. (Note that throughout, the LVIA concludes that the levels of effects for each landscape receptor would be the same, which is unlikely given the notable localised variations in character throughout the study area – see SGHS's comments on the Applicant's response to ExQ2.13.7). However, firstly, see the note in REP1-195 about problems with the LVIA's criteria and point scales, at para. 2.4.5 – 17. Secondly (as explained in REP-195 paras. 6.1.20 – 23), note a) the omission of effects on character areas / types; b) the level of receptor sensitivity is higher than reported in the LVIA; c) not all indirect adverse effects on landscape character can be mitigated by screening views; and d) generally, levels of indirect landscape effects tend to be highest closest to the site and reduce gradually with distance. Therefore, at Year 15, it is likely that

				indirect effects on the landscapes closest to the site would be **at least Moderate Adverse (significant).** The LVIA concludes that at Year 15, there would be **Moderate Beneficial (significant)** effects on the sites' landscape 'fabric' / elements (ie *landform, woodland, hedges, tree cover*, and *vegetation*). However, the reason for the beneficial effect is the LVIA's erroneous assumption that landscape / visual mitigating measures (eg screen planting) can be double counted as landscape / visual enhancement – see above. Therefore, at best, effects on 'fabric' / elements would be Neutral, as the proposals are mitigation not enhancement, and at worst, **significant adverse**, due to the mitigation measures giving rise to adverse effects on character and views for reasons such as inappropriateness and total loss of view, as explained in REP1-195. The LVIA does not assess effects on the sites' overall character, but my own assessment (see REP1-195) concluded that the development would result in **significant direct adverse effects on the character of all of the sites for the duration of the operation**.
Q2.13.4	For NNC	**Cumulative Impacts**		SGHS would like to comment: The applicant has admitted that the Greenhill site was chosen based on grid export capacity at Grendon. There is currently a 49.99 MW BESS site in proximity to the sub-station and planning permission granted for an additional 49.99 MW BESS site adjacent, for which construction is anticipated within the next year. The Green Hill Solar DCO is considering adding a further 500 MW BESS site in close proximity. Another 49.99 MW BESS site just off station road has been applied for. NPS EN-3 states "applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure" We request that the ExA should consider carefully

				the cumulative impacts of creating a heavily industrialised zone of BESS so near human habitation.
Q2.13.8	**for SGHS**	**LVIA Methodology**	The Councils appear to be content with the methodology used for the LVIA and landscape assessments and are satisfied that they follow GLVIA3. However, in SGHS's submission REP1-194 and REP1-195, it is considered that the applicant's LVIA method and process have errors and flawed assumptions have been made (paragraph S.11 onwards). Does the applicant's response to these concerns in SGHS-28 [REP2-048] satisfactorily address these issues?	As noted in SGHS's responses to ExQ2.13.8 [**REP3-103**], SGHS's landscape expert does **not** consider that the applicant's response to these concerns in the Applicant's responses to Written Representations at Deadline 1 [REP2-048] satisfactorily address these issues. See SGHS's comments on REP2-048 *SGHS Comments on Applicant's Responses to Written Representations at Deadline 1* for Deadline 3*. The full technical reasons for the concerns are set out in REP1-195. Additional commentary is provided here because as explained in SGHS's comment on the Applicant's responses to ExQ2.13.2 above, SGHS consider that the question of whether the scheme would result in landscape benefit or harm is an important matter. Given the landscape experts' differences of opinion, it may be helpful for the LVIA method to be the subject of a round-table discussion. If significant disagreement about technical matters and interpretation of the guidance remains, if considered appropriate, it may be possible to seek an opinion from the Landscape Institute.
Q2.13.10	For WNC	**Effect on Local Roads**	In paragraph 4.167 - 4.169 of the LIR, reference is made to local roads having	This question is directed to WNC, but SGHS would like to draw the Examining Inspectors' attention to **REP3-101** (SGHS's *Summary of Oral Submissions to ISH-2*), paras. 54 – 66, which summarise the reasons (as explained in REP1-193 *Appendices to SGHS's Landscape and Related*

			been omitted from the glint and glare assessments. The applicant has submitted a further Glint and Glare Technical Note [REP2-054], does this document address these omissions or do you consider further local roads should be included in the assessments?	*Matters Statement*, Appendix CT-I *Glint and Glare*) why the Applicant's recent assessment of glint and glare effects on local roads has concluded that receptors would only experience Low levels of effects, and why generally, in SGHS's opinion, the Applicant's Glint and Glare Assessment (GGA) [**APP-052**] is flawed. Regarding local roads specifically, the first paragraph of REP2-054 Section 2.1 *Road Infrastructure – Local Roads* states that '*Based on industry guidance, technical modelling is not recommended for local roads, where traffic densities are likely to be relatively low*'. Firstly, the 'industry guidance' is precisely that – there is no independent GGA guidance. Secondly, the qualifying note to the above sentence in terms of traffic densities being relatively low (which is also a criterion for assessing effects on the safety PRoW users, as opposed to amenity which is not assessed) is that 'therefore, a glint / glare event would not result in large numbers of casualties / fatalities, unlike an air, rail, or major road accident'. In SGHS's opinion, even one casualty / fatality should be of great concern, especially if the risks were identified but not mitigated.

2.16 Transportation and Traffic

ExQ	Respondent	Question	Applicant's Response	SGHS Comments
Q2.16.4	The Applicant	**Access to Construction Compound 4**	...It is proposed for construction traffic movements to route via Station Road to access CR18, and then route south along the internal haul route south from Station Road to access the compound.	SGHS wishes to comment: Has the applicant calculated the amount of HGV traffic that there will be to construct the internal haul route? Experience with the construction of the Statera BESS demonstrates that the amount of traffic generated just to construct an internal haul route is considerable. Also, given that the internal haul route will inevitably be constructed from MOT or similar, what plans are in place for the removal of the internal haul route once the construction has finished? This road will cause a very obvious visual scar on the landscape just outside the village and adjacent to the Grade 1 listed park and gardens of Castle Ashby Estate.
Q2.16.10	SGHS	**Public access to the countryside and perceptions of safety:** Stop Green Hill Solar's Landscape and Related Matters Statement [REP1-195] raises concerns regarding public safety when using fenced		At present, as one walks along the Green Lane, there are two main options for escape. Firstly, there are wide entrances to each field on either side – some have gates, mostly they are not secured and can be opened, all would be relatively easy to climb over, and some there is space to walk around the posts on one or both sides. Secondly, there are some gaps in the hedgerows, more obvious in winter, where it would be possible to get through. Once in any of the fields to the east, these are all open arable, and many connect easily through to the Kettering Road. On the west side, there is only one field's width to Newland Road, and all fields have field gates on the Newland Road as well. If the proposed development received consent, as far as can be determined from the Illustrative Layout Plan for Green Hill A, GH 6.4.4.1, APP – 193, these opportunities for escape would be affected in several ways.

		paths through the proposed development. The green lane off Newland Road north of Walgrave which would pass between solar panels is given as an example. Paragraph 8.39 of the document submits that the application would create an inescapable corridor along an existing path that was previously open to the wider countryside. It is submitted that the current route provides anyone using it who may feel under threat		Firstly, sight lines along the Green Lane will be shortened by the much higher vegetation on either side – this will both actually decrease any warning view but will also significantly increase the perception of the potential for danger. At present, there are mostly wide-open views along and across the local countryside, particularly in winter, as must have been appreciated by the Inspectors on their ASI. Secondly, there would be no potential for escaping through gaps in the hedgerows, as these will have been reinforced, and new higher planting growing to around 4.5 metres. Thirdly, it is unclear whether it will still be possible to use the field gate access, but even if this is possible, once through any of the gates, there will be a continuous fence along and between the fields, with options for escaping very limited to the far edges of only the fields at either end of the east side, i.e. AF18 and AF28, and on the west side, at the far ends around fields AF29 and AF17, but also in the middle perhaps, between fields AF14 and AF15. Therefore it is clear that easy options of escape and running across fields will no longer be available. It is not only the logical potential for increased risk that is the problem, it is the perception of increased risk which is even more powerful.

		with numerous options for escape and means of drawing attention in the event of an emergency. Please explain what these are, and how they would change if the proposed development received consent.		

2.17 Water Environment

ExQ	Respondent	Question	Applicant's Response	SGHS Comments
Q2.17.1	All Parties	**Environment Agency updated flood mapping dataset**	Where the level of risk or local factors required further assessment beyond the strategic NaFRA2 mapping, this was undertaken through detailed hydraulic modelling or, for minor watercourses, through open channel Manning's calculations with the appropriate climate change allowances, as documented in [APP-097] and the relevant annexes.	SGHS wishes to comment: Notwithstanding the use of flood models, SGHS would be ready to provide photographs of recent flooding in the area which took place in September-October 2024 and which may not be appropriately accounted for in the most recent flood datasets.