

# **Green Hill Solar Farm**

## **EN010170**

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

Prepared by: Lanpro Services

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## Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 4

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

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# **1 Introduction**

- 1.1.1 This document provides Green Hill Solar Farm Limited's (the 'Applicant's') response to submissions made to the Planning Inspectorate (PINS) by 17 December 2025, relating to Examination Deadline 3 for the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').
- 1.1.2 This report provides the Applicant's comments on responses to the Examiners Second Written Questions submissions by Host Authorities, Statutory Consultees and Parish Councils.
- 1.1.3 Section 2 of this report is tabulated to include the ExA's question reference number, the response made to the question and the Applicant's follow up response to each question.



## 2 Applicant's Comments on Responses to ExA Second Written Questions

### 2.1 Milton Keynes City Council [\[REP3-086\]](#)

Reference	ExQ	Question	Response	Applicant's Response
MKCC-001	Q2.1.3	<b>Updated National Policy Statements for energy infrastructure</b>  On 13 November 2025 government published its response to revisions to National Policy Statements for energy infrastructure. Final versions of the updated EN-1, EN-3 and EN-5 have been laid in Parliament for a 21-sitting day 'consideration period', before being published in December. The final paragraph of the government response document makes clear that: "Once published, the updated 2025 NPSs (EN-1, EN-3 and EN-5) will have effect in relation to applications for development consent accepted for examination. For applications that have been accepted for examination before publication of the updated 2025 NPSs, the 2024 versions will underpin planning decisions." The ExA will therefore be forming its recommendation based on the 2024 versions of the energy NPSs. However, is there anything in the updates to EN-1, EN-3 and/or EN-5 that you consider might be material in relation to the Green Hill Solar Farm application?	No comments.	The Applicant note this comment.
MKCC-002	Q2.13.5	<b>Fields GF9 and GF13</b>  Noting the submissions in relation to fields GF9 and GF13, is there an update regarding any progress on this issue or any updates as to the status of the emerging policies of the MKCP or the proposed SLA and the weight that should be given to these?	A meeting took place on 6/11/25 to discuss landscape matters and concerns raised by the MKCC Landscape Architect. This issue was not progressed any further with MKCC maintaining the position that the fields should be excluded from the proposal. The MKCP is at Regulation 19 stage. Therefore, at this stage, the Council is applying the same weight to the relevant policies and supporting documents as set out in the Council's LIR.	The Applicant acknowledges that the MK City Plan 2050 Regulation 19 consultation commenced on the 7 November for a six-week period. This has been further extended until the 16 February. The Applicant prepared an update to the <b>Planning Statement Revision B [EX4/GH7.15_B]</b> and the <b>Policy Compliance Document Revision B [EX4/GH7.23_B]</b> to reflect the update to the policy position. The Applicant is proposing to prepare a representation for submission into the Local Plan consultation in due course which sets out the Applicant's assessment of why fields GF9 and GF13 should not be designated as part of the extended SLA. This position is as per the Applicant's response to comment 'MKC-4.9' in <b>The Applicant's Responses to Local Impact Reports [REP2-049]</b> .  The MKCP is currently at Reg 19 Consultation where emerging policies carry minimum weight.
MKCC-003	Q2.13.6	<b>Additional viewpoints</b>  It is noted in the applicant's response MCC-012 [REP2-050] and MKCC's response Q16.0.3 [REP1-0170] that discussions are being held with MKCC to agree additional viewpoint locations with a view to submitting these at either D4 or D5. Are there any updates on the progress of these discussions?	A meeting took place on 6/11/25 to discuss landscape matters and concerns raised by the MKCC Landscape Architect. In an email dated 25/11/25, and as set out within deadline 1 submissions responses, the applicant has confirmed that they will undertake additional viewpoints and photomontages as requested, with the updated documents to be provided by deadline 4 or 5.	The Applicant received details for the locations for the x3 additional Viewpoints via email from the MKCC Landscape Officer on the 8th December 2025.  Technical Photography for all 3 VPs was undertaken on Saturday 13th December 2025. Verified Photomontages are currently being progressed, with the updated documents to be provided by Deadline 5.
MKCC-004	Q2.13.7	<b>Local character variations</b>	MKCC do not consider that a suitable level of consideration has been given to local landscape character baseline variations. The Review of	The LVIA <b>[APP-045]</b> has been undertaken with consideration of the appropriate and relevant guidance and





Reference	ExQ	Question	Response	Applicant's Response
		<p>Paragraph S.13 of Stop Green Hill Solar's Landscape and Related Matters Statement [REP-194] and [REP1-195] and the Local Impact Reports [REP1-169, REP1-171 and REP1-175] mention the need to consider the local variations in landscape character given the site is over such a wide area. Do the applicant, the Councils and Stop Green Hill Solar consider that a suitable level of consideration has been given to local landscape character baseline variations on which the assessments have been based upon?</p>	<p>Local Landscape Designations report May 2024 identified areas of locally attractive landscape character in the borough of MKCC and has informed proposed policies and the designation of Special Landscape Areas in the current Regulation 19 stage of the MK City Plan 2050.</p> <p>The Environmental Statement Chapter 8: Landscape and Visual Impact Assessment (May 2025) has not considered Local Landscape Designations in the section headed Landscape Designation and should do as a material consideration. Large scale development such as this has the potential to erode valued landscape at a local level. Special Landscape Area (SLA) designations were included in earlier consultations but have been dropped. This is disappointing.</p> <p>In MKCC, the solar farm proposal will extend up the slopes to the local authority border at Northey Farm, East to Three Shire Wood and the Three Shires Way and into two field parcels East of the Three Shires Way assessed as MKCC Special Landscape Area (SLA) and proposed to be covered by the SLA Policy in MK City Plan 2050.</p> <p>As set out previously, two field parcels of Site G (the GF9 and GF13 field parcels east of Lavendon bridleway BW 15) proposed for solar farm development impinge on land identified as locally attractive landscape Ouse Valley Special Landscape Area in the local plan evidence base document. Their inclusion as part of the solar development would be detrimental to their landscape character.</p>	<p>robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. Appendix 8.4: Landscape Character Area Descriptions <b>[APP-082]</b> contains descriptions and extracts of all the published Landscape Character Assessments relevant to the Scheme.</p> <p>Directly relevant to Site G, which is contained within the boundary of Milton Keynes City Council are the National Character Area Profiles (NCA) and the Milton Keynes Landscape Character Assessment. However, the Landscape Study Areas extend beyond the MKCC boundary, and therefore Landscape Character Areas within the adjacent Northamptonshire Current Landscape Character Assessment are also relevant to the consideration of the impacts of the Scheme on Landscape Character.</p> <p>Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[REP1-041]</b> contains an assessment of the impacts of Site G on Landscape Character for each of the Study Areas: 1km Study Area; The 2km Study Area and the 5km Study Area.</p> <p>The assessment for each Study Area for Site G includes an identification of the landscape Baseline for each Study Area based on on-site field work and a detailed desktop review of the published Landscape Character documents undertaken by the Applicant's Landscape Architect. Following this approach, Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[REP1-041]</b> includes a detailed review of the baseline context with reference to the published Landscape Character documents and Site Work allowing a robust identification of Landscape Value, Susceptibility and Landscape Sensitivity.</p>
MKCC-005	Q2.17.1	<p><b>Environment Agency updated flood mapping dataset</b></p> <p>Do you wish to comment on any implications for the scheme of the Environment Agency's NaFRA2 updated flood mapping dataset, released 25 March 2025?</p>	No comment.	The Applicant notes this comment.



## 2.2 North Northamptonshire Council [\[REP3-088\]](#)

Reference	ExQ	Question	Response	Applicant's Response
NNC-001	Q2.1.3	<p><b>Updated National Policy Statements for energy infrastructure</b></p> <p>On 13 November 2025 government published its response to revisions to National Policy Statements for energy infrastructure. Final versions of the updated EN-1, EN-3 and EN-5 have been laid in Parliament for a 21-sitting day 'consideration period', before being published in December. The final paragraph of the government response document makes clear that: "Once published, the updated 2025 NPSs (EN-1, EN-3 and EN-5) will have effect in relation to applications for development consent accepted for examination. For applications that have been accepted for examination before publication of the updated 2025 NPSs, the 2024 versions will underpin planning decisions." The ExA will therefore be forming its recommendation based on the 2024 versions of the energy NPSs. However, is there anything in the updates to EN-1, EN-3 and/or EN-5 that you consider might be material in relation to the Green Hill Solar Farm application? Response:</p>	No comments.	The Applicant notes this comment.
NNC-002	Q2.1.9	<p><b>Community Benefit Fund</b></p> <p>The ExA notes your request in both your relevant representation [RR-1243] and local impact report [REP1-171] for the Community Benefit Fund to be secured as part of the DCO, as you consider it is required to mitigate the impacts of the development. Could you signpost the ExA to any examples in made DCOs where a Community Benefit Fund, or equivalent, has been secured?</p>	<p>NNC notes that the CBF has been put forward as a voluntary benefit by the Applicant. NNC would like to understand, the level of benefit the Applicant's intend to provide? In regard to a mechanism to secure the CBF, NNC consider that it would be to the benefit of the community to secure the CBF as part of the DCO. We suggest that this follows a similar approach to that of Botley West Solar Farm DCO. The Botley West Solar Farm DCO has secured the CBF where a deed is entered into under section 1 of the Localism Act 2011 (which allows a local authority to do anything which an individual can do, subject to statutory restrictions) and section 111 of the Local Government Act 1972 (which allows a local authority to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions). The deed is entered into between the LPA and the Applicant and will need to be completed before any grant of development consent. Any deed would have to provide for circumstances in which the Applicant transferred ownership of the project to any other person and for that person to enter into a deed on terms no less advantageous to the LPA. It is envisaged that the affected parishes would then set up a Community Interest Company (CIC) made up of representatives of the affected parishes (and in conjunction with the Community Liaison Group). Then once the LPA is in receipt of the funds from the Applicant, the LPA transfers it to the CIC which would be the administrator of the CBF. Should the CIC not come to fruition for any reason or be disbanded during the life of the development, the LPA (or successor(s) to their statutory functions) would administer the fund. NNC consider that this approach is appropriate here.</p>	<p>The Applicant's position on the community benefit fund is set out in response to comment 'NNC-085' in <b>The Applicants Response to the Relevant Representations [REP1 161]</b>.</p> <p>In response to the example of using a deed under section 1 of the Localism Act 2011, this is solely a contractual agreement and sits separate from and does not form part of the DCO or planning process.</p> <p>The Applicant notes the example associated with Botley West that has been referenced. This relates to an oral submission by that applicant. The mechanism for payment and management of the community fund on that project has not yet been agreed (i.e. whether the payment will be made to the Council or an independent third party) and the Applicant understands an agreement has not yet been entered into with the local planning authority to manage the fund.</p> <p>The Applicant's approach is aligned with the approach on made DCOs, including West Burton, Cottam and Gate Burton. This allows for the most appropriate mechanism for the management of the community fund to be set up and secured once the Scheme is being progressed.</p>



Reference	ExQ	Question	Response	Applicant's Response
				There are existing examples of how a community benefit fund can be set up and managed by a separate administrator, such as Cleve Hill and the Hornsea 3 Community Funds. These funds are administered through the charity organisation GrantScape. Details for both schemes can be found through the GrantScape website. For both of these schemes, the same approach was taken as the Applicant is taking for the Scheme, in that the community benefit fund sits wholly outside the DCO.
NNC-003	Q2.10.2	<b>Noise assessment for the BESS</b>  Noting the applicant's response on p.121 of its Responses to Local Impact Reports [REP2-049] to paragraphs 8.264 to 8.266 of your local impact report stating that requirement 17 in schedule 2 to the draft DCO requires an operational noise management plan confirming how the design of the BESS has incorporated the operational noise mitigation measures set out in the oOEMP [REP1-133], to be approved by the relevant LPA prior to the commencement of the BESS, does this address your recommendation for submission of a noise assessment for the BESS?	The Council confirm that Requirement 17 in Schedule 2 to the draft DCO addresses this point.	The Applicant notes this comment.
NNC-004	Q2.11.4	<b>Non-designated (built) heritage assets within/outside the Order Limits</b>  Noting the applicant's response on p.89 of its Responses to Local Impact Reports [REP2-049] to paragraph 8.141 of your local impact report stating that the Order Limits runs adjacent to the property boundary of the three non-designated assets listed but does not include the buildings, does this address the previous disagreement on this point?  If you still consider that these three non-designated heritage assets fall within the Order Limits could you please provide some evidence into the examination to back up your argument.	Having reviewed the Illustrative Layout Plans (APP-196 & APP-197, and APP-200), NNC are content to agree that the three NHDAs identified (Woodlodge Farm, Hockerhill Farm and Ward's Barn) are outside of the Order Limits.	The Applicant notes this comment.
NNC-005	Q2.13.3	<b>Mitigation planting</b>  In relation to paragraph 8.43 of your Local Impact Report [REP1-171], are there any specific areas where the proposed mitigation hedgerow planting of approximately 4 – 4.5m height would result in unacceptable levels of enclosure or impacts on existing visual connections/rural openness?	<p>The Council's position is that hedgerows grown to approximately 4 4.5 metres are not inherently unacceptable, but their influence on landscape character varies depending on location. This height exceeds what is typical across much of the receiving landscape, where the condition is one of low to moderate enclosure and where open views across farmland form a defining element of the character areas.</p> <p>The Council's principal concern is not with visual screening itself but with the way taller, more continuous hedgerow structures would alter the established character of certain rural lanes and PRowS. Along parts of Easton Way and Easton Lane, the landscape is currently perceived as open and rural and a relatively simple field pattern. Introducing hedgerows at 4–4.5 metres would noticeably increase enclosure along these lanes and change the way they are</p>	<p>The LVIA [APP-045] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility.</p> <p>The assessment of both the landscape and visual effects of the Scheme includes for the change associated with the proposed increase in height of those hedgerows within and on the edge of the arrays.</p> <p>The LVIA recognises that there would be an immediate change to the character of the Site and its immediate setting as it changes from an area of</p>





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			<p>experienced, even in places where the solar arrays would not be directly visible.</p> <p>Similarly, for users of PRow NNITAI3, which crosses open farmland, the proposed hedgerow heights may generate a greater sense of physical and perceptual narrowing. While this does not necessarily constitute an unacceptable impact, it represents a clear shift from the existing open character to a more enclosed and managed landscape, and this change is material to how the landscape is understood and experienced.</p> <p>It is also important to emphasise that the Council does not object to hedgerow planting as a matter of principle. The concern relates specifically to the character implications of taller hedgerows in locations where rural openness is an essential aspect of landscape character. In these locations, tall hedgerows would deliver effective screening but would also introduce a different character outcome that should be weighed in the assessment of long-term effects. This is why the LIR highlights hedgerow height as a relevant consideration.</p>	<p>arable farmland to solar infrastructure, and that these changes would result in adverse visual effects.</p>
NNC-006	Q2.13.4	<p><b>Cumulative impacts</b></p> <p>The applicant has responded to your concerns relating to cumulative impacts and viewing the scheme as a single, cohesive development in NNC 8.45 [REP2-049]. Does this address or alter your concerns in this regard?</p>	<p>The Council has considered the Applicant's comments but remains concerned that the magnitude and duration of operational landscape effects continue to be understated. The Applicant places weight on the dispersed layout of the scheme, suggesting that because the sites are spatially separated, solar development will not form a defining characteristic of the surrounding landscape. However, this does not reflect how landscape character is assessed or experienced at broader scales.</p> <p>The Council notes the Applicant's statement that the Scheme's dispersed layout prevents it from being perceived as a cohesive whole. This may be true in visual terms, but landscape character is not determined solely by what can be seen from individual viewpoints or locations. Within Northamptonshire, and specifically across the Sywell Plateau, the majority of Sites A, A.2, B, C, D and most of E all lie within the same landscape character area. Although these sites are physically separated, together they form a substantial proportion of the Plateau. When considered collectively, the replacement of large areas of agricultural land with energy infrastructure represents a materially significant change that redefines the character of this part of the county. The fact that the sites are not physically connected does not diminish the extent of land use change. Instead, it spreads the influence of the development across a wider area. Dispersal does not reduce the effect on character, instead it could be seen to broaden the area in which those effects are experienced.</p> <p>The Applicant's reasoning that solar development is simply "overlaid" on the landscape and is therefore less transformative is also noted. However, land use is itself a tangible component of landscape fabric, and the replacement of agricultural activity with electricity generation represents a clear shift in the landscape's fundamental function and appearance. Even if hedgerows, trees and watercourses are</p>	<p>The Applicant notes this comment and is working with NNCs landscape representative on this matter through the SoCG. Updates are set out in the <b>North Northamptonshire Council Statement of Common Ground Revision A [EX4/GH8.3.1_A]</b>, submitted at Deadline 4.</p>



Reference	ExQ	Question	Response	Applicant's Response
			<p>retained, the defining change of land use for more than half a century does not negate this.</p> <p>The Applicant also continues to emphasise how the scheme will be “perceived,” implying that if views are screened or filtered, the influence on landscape character will be minimal. As previously stated, the Council does not agree that landscape character is determined primarily, by visibility. Character arises from the tangible and intangible attributes of the landscape, including land use, management, landform, landscape features and perceptual qualities. The introduction of solar arrays, fencing, substations and associated infrastructure represents a material change to the landscape fabric. These components influence character irrespective of whether they are visible from viewpoints.</p> <p>For these reasons, the Council maintains that the operational effects on landscape character, particularly when considered cumulatively across sites, would be slightly more adverse than the Applicant has judged. This is a matter of degree rather than a fundamental difference, especially as the Applicant already identifies adverse landscape character effects within the 1 km, 2km and 5km study areas. The Council's view is that, given the extent of land-use change and the distribution of sites across areas, the cumulative influence on landscape character would be slightly greater than reported. Mitigation will help reduce impacts by Year 15; however, the underlying change in land use and the associated character effects continue for the duration of the Scheme and remain adverse.</p>	
NNC-007	Q2.13.7	<p><b>Local character variations</b></p> <p>Paragraph S.13 of Stop Green Hill Solar's Landscape and Related Matters Statement [REP-194] and [REP1-195] and the Local Impact Reports [REP1-169, REP1-171 and REP1-175] mention the need to consider the local variations in landscape character given the site is over such a wide area. Do the applicant, the Councils and Stop Green Hill Solar consider that a suitable level of consideration has been given to local landscape character baseline variations on which the assessments have been based upon?</p>	<p>From the Council's perspective, the Applicant has prepared a baseline assessment that makes appropriate use of established landscape character studies and divides the study area by individual sites. As such, the Council agrees that the baseline information is generally sound and suitable as a foundation for assessment.</p> <p>However, while the methodology is accepted, the Council remains of the view that certain local variations in landscape character have not been given sufficient weight in the subsequent judgements regarding value, susceptibility, sensitivity and magnitude of change for each site. These variations relate to differences in landform, settlement context, rural experience and the ability of each site to accommodate a change in land use.</p> <p>For example, Site F exhibits more noticeable topographic variation than many of the other sites, resulting in a landscape where changes in land use are more readily appreciable within the wider character area, even if the effects are not always visually prominent from public viewpoints. In contrast, Site E, while not visually exposed due to the absence of PRoW, nonetheless has a clear and established relationship with surrounding farmland, meaning that a shift in land use from agriculture to energy infrastructure would still alter the character of that area in a meaningful way.</p> <p>The Council therefore considers that although local character variations have been recognised within the ES, they have not always been carried through with sufficient influence into the final</p>	<p>Appendix 8.4: Landscape Character Area Descriptions <b>[APP-082]</b> contains descriptions and extracts of all the published Landscape Character Assessments relevant to the Scheme.</p> <p>Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[REP1-041]</b> contains an assessment of the impacts of each individual Site on Landscape Character for each of the Study Areas: 1km Study Area; The 2km Study Area and the 5km Study Area. The assessment for each Study Area includes an identification of the landscape Baseline for each Study Area based on on-site field work and a detailed desktop review of the published Landscape Character documents undertaken by the Applicant's Landscape Architect.</p> <p>Following this approach, Appendix 8.3 ES LVIA Assessment Sheets (Revision A) <b>[REP1-041]</b> includes a detailed review of the baseline context with reference to the published Landscape Character documents and Site Work allowing a robust identification of Landscape Value, Susceptibility and Landscape Sensitivity.</p>



Reference	ExQ	Question	Response	Applicant's Response
			judgements. This is not a disagreement with the method used but rather a difference in professional judgement regarding how localised nuances contribute to overall sensitivity judgements and the magnitude of change.	



### 2.3 West Northamptonshire Council [\[REP3-089\]](#)

Reference	ExQ	Question	Response	Applicant's Response
WNC-001	Q2.1.3	<p><b>Updated National Policy Statements for energy infrastructure</b></p> <p>On 13 November 2025 government published its response to revisions to National Policy Statements for energy infrastructure. Final versions of the updated EN-1, EN-3 and EN-5 have been laid in Parliament for a 21-sitting day 'consideration period', before being published in December. The final paragraph of the government response document makes clear that:</p> <p><i>"Once published, the updated 2025 NPSs (EN-1, EN-3 and EN-5) will have effect in relation to applications for development consent accepted for examination. For applications that have been accepted for examination before publication of the updated 2025 NPSs, the 2024 versions will underpin planning decisions."</i></p> <p>The ExA will therefore be forming its recommendation based on the 2024 versions of the energy NPSs. However, is there anything in the updates to EN-1, EN-3 and/or EN-5 that you consider might be material in relation to the Green Hill Solar Farm application?</p>	No comments to make.	The Applicant notes this comment.
WNC-002	Q2.11.3	<p><b>Archaeological assessment</b></p> <p>Do you have any comments to make on the additional geophysical surveys [REP1-059] to [REP1-077] that were submitted by the applicant at deadline 1?</p>	No additional comments to make.	The Applicant notes this comment.
WNC-003	Q2.13.7	<p><b>Local character variations</b></p> <p>Paragraph S.13 of Stop Green Hill Solar's Landscape and Related Matters Statement [REP-194] and [REP1-195] and the Local Impact Reports [REP1-169, REP1-171 and REP1-175] mention the need to consider the local variations in landscape character given the site is over such a wide area. Do the applicant, the Councils and Stop Green Hill Solar consider that a suitable level of consideration has been given to local landscape character baseline variations on which the assessments have been based upon?</p>	The characteristics of Sites A, A.2 and B are appropriately reflected in the Applicant's baseline assessment. The landform, land use, settlement context and field pattern within these parcels correspond well with the descriptions and sensitivity judgements presented in the LVIA. On this basis, WNC considers that the level of consideration given to local landscape character within the baseline is suitable for the purposes of the assessment. The susceptibility and sensitivity judgements for these parcels are regarded as proportionate, and WNC does not identify any notable gaps or omissions in how local character has been represented. As such, the Council is satisfied that the landscape baseline for the West Northamptonshire parcels has been robustly and appropriately established.	The Applicant notes this comment.
WNC-004	Q2.13.10	<p><b>Effect on local roads</b></p> <p>In paragraph 4.167 - 4.169 of the LIR, reference is made to local roads having been omitted from the glint and glare assessments. The applicant has submitted a further Glint and Glare Technical Note [REP2-054], does this document address these omissions or do you consider further local roads should be included in the assessments?</p>	Following a request by WNC, the applicant has undertaken an assessment of three further roads directly adjacent to solar array sites within WNC's boundary that were originally deemed outside of the scope of assessment due to them being minor roads with low traffic volumes. <b>Glint and Glare Technical Note [EX2/GH8.2.4]</b> was submitted at Deadline 2 by the applicant to address this request where modelling has been undertaken of Newland Road, Broughton Road, and Kettering Road. The results show a 'low impact' may be classified towards all three roads. As such, no further mitigation is recommended. WNC are content that the matter has now been robustly assessed (over and above industry recommendations), and the matter can be concluded.	The Applicant notes this comment. This matter has been added to the <b>West Northamptonshire Council Statement of Common Ground Revision A [EX4/GH8.3.2_A]</b> submitted at Deadline 4.
WNC-005	Q2.17.1	<p><b>Environment Agency updated flood mapping dataset</b></p>	No comment to make.	The Applicant notes this comment.





Reference	ExQ	Question	Response	Applicant's Response
		Do you wish to comment on any implications for the scheme of the Environment Agency's NaFRA2 updated flood mapping dataset, released 25 March 2025?		



## 2.4 Environment Agency [\[REP3-091\]](#)

Reference	ExQ	Question	Response	Applicant's Response
EA-001	Q2.17.1	<p><b>Environment Agency updated flood mapping dataset</b></p> <p>Do you wish to comment on any implications for the scheme of the Environment Agency's NaFRA2 updated flood mapping dataset, released 25 March 2025?</p>	<p>We are satisfied that the publication of NaFRA2 will have no material impact on the assessment of flood risk that the Applicant has undertaken to date.</p> <p>There are some minor changes in flood extent that have arisen in the updated Flood Map for Planning published in March 2025. In some locations, particularly in the vicinity of Grendon and the proposed Battery Energy Storage System (BESS) location the extent of the updated Flood Map for Planning (March 2025) is slightly reduced when compared to the previous Flood Map for Planning. To the northwest of the River Nene there are some slight increases in extent shown in the new Flood Map for Planning dataset (March 2025) when compared to the previous Flood Map for Planning, but these increases are generally aligned to the small Ordinary Watercourses which bisect the Order limits. The Applicant has undertaken their own site-specific hydraulic modelling for the River Nene, Grendon Brook, and Field Drain which run near the BESS site. This site-specific hydraulic modelling should be used in preference to the outputs from NaFRA2. Additionally, the Applicant has undertaken supplementary analysis of the flood risk from smaller Ordinary Watercourses calculating levels based on the 2080s epoch upper climate change allowance. This should also be used in preference to the NaFRA2 outputs on the basis that it is more precautionary.</p>	<p>We welcome the Environment Agency's confirmation that the publication of NaFRA2 has no material impact on the Applicant's flood risk assessment.</p> <p>We note the Environment Agency's summary of minor changes in mapped flood extents in the March 2025 Flood Map for Planning update. The Applicant confirms that the Scheme flood risk evidence base has been prepared using the best available information, and that where site-specific assessment has been undertaken (including at the proposed BESS location), this provides the appropriate basis for decision making in preference to national scale mapping products. The Applicant also notes the use of precautionary supplementary analysis for ordinary watercourses, including application of the 2080s upper climate change allowance where relevant, as referenced by the Environment Agency.</p>
EA-002	Q2.17.3	<p><b>Flood Risk</b></p> <p>Please explain whether the Environment Agency (EA) considers the applicant's proposed approach to the EA's concerns regarding hydraulic modelling (EA-016 of the Applicant's Response to Relevant Representations [REP1-161]) to be sufficient.</p>	<p>We broadly agree with the modelling approach taken and note that the Applicant has undertaken additional sensitivity testing within the respective models and provided further details with respect to the Station Road culvert dimensions on the Field Drain; this is welcomed. We have one outstanding concern with respect to hydraulic modelling undertaken for the middle River Nene. We appreciate the Applicant has undertaken sensitivity testing which is welcomed. The Applicant should present the mapped outputs of the sensitivity testing for the middle River Nene in relation to the BESS within the Flood Risk Assessment (FRA). This is important because the Applicant's updated hydraulic modelling for the middle River Nene shows a reduction in flood extent when compared to the existing Environment Agency hydraulic model outputs. We need to be confident that the BESS is not at flood risk from the River Nene during the design flood event.</p>	<p>We welcome the Environment Agency's confirmation that it broadly agrees with the modelling approach taken and acknowledges the additional sensitivity testing and further detail provided in relation to the Station Road culvert on the Field Drain.</p> <p>In response to the outstanding point raised, the Applicant will provide mapped outputs of the sensitivity testing for the Middle River Nene in relation to the BESS within the Flood Risk Assessment documentation. This will include mapped flood extents for the design event and the relevant sensitivity test scenarios, sufficient to demonstrate that the BESS is not at flood risk from the River Nene during the design flood event. This will be submitted at Deadline 5.</p> <p>The Applicant will submit this as an update to the BESS flood risk evidence base (drawing on <b>Hydraulic Modelling Technical Note: BESS [REP2-052]</b> and the BESS-specific <b>FRA annex [REP1-057]</b>) to ensure the requested mapped outputs are clearly presented and auditable.</p>



## 2.5 Natural England [\[REP3-094\]](#)

Reference	ExQ	Question	Response	Applicant's Response
NE-001	Q2.7.6	<b>Consultation on document and plans to be certified</b> The draft development consent order [CR1-014] currently provides for the statutory nature conservation body to be consulted on the final landscape and ecological management plan, ecological protection and mitigation strategy and biodiversity net gain strategy. Would Natural England wish to be consulted on any of the other documents and plans to be certified, as set out in Schedule 13, Part 1 of the draft order?	Yes, Natural England would like to be consulted.	The Applicant is seeking clarification from Natural England on whether there are any further requirements they wish to be consulted on.
NE-002	Q2.8.1	<b>Disturbance to species outside the Special Protection Area</b> Does the applicant's response to Issue reference NE-004 (Visual and noise disturbance) of the applicant's Responses to Deadline 1 Submissions document [REP2-050] adequately address Natural England's concerns in this regard? If not, please outline how the concerns could be addressed.	Yes, the applicants response to REP2-050 adequately addresses Natural England's concerns.	The Applicant note this comment.
NE-003	Q2.8.2	<b>Functionally Linked Land Methodology</b> Although the use of a "land parcel scale" in determining FLL was approved by Natural England, the applicant's response at NE-003 of its Responses to Written Representations at Deadline 1 [REP2-048] sets out that a "land parcel scale" was not used in determining FLL. Does this affect Natural England's conclusions on the approach to determining FLL?	Natural England have agreed the approach to determining FLL with the client. The use of 'land parcel scale' is just a different term than expected and caused confusion. Natural England can conclude they have agreed the approach to determining FLL.	The Applicant note this comment.
NE-004	Q2.8.4	<b>Ramsar site conservation objectives</b> To clarify question 9.0.10 of the Examining Authority's Written Questions 1 [PD-007], please confirm whether the conservation objectives for the Special Protection Area which are set out in Natural England's response to the question (in its Responses to ExQ1 document [REP1-181]) also apply to the Ramsar site.	Natural England confirm the conservation objectives for the Special Protection Area also apply to the Ramsar site.	The Applicant notes this response.



## 2.6 Lavendon Parish Council [\[REP3-113\]](#)

Reference	ExQ	Question	Response	Applicant's Response
LPC-001	Q2.13.5	<b>Fields GF9 and GF13</b>  Noting the submissions in relation to fields GF9 and GF13, is there an update regarding any progress on this issue or any updates as to the status of the emerging policies of the MKCP or the proposed SLA and the weight that should be given to these?	<p>In response to this question Lavendon Parish Council has no further information concerning progress on this issue but would refer the inspectorate to our previous representation of November 2025 and the statement made on behalf of the Council at the Open Floor Meeting on 12th December 2025. This area of attractive landscape was included in the Milton Keynes Strategy to 2050 after careful consideration of its value to the local landscape and has been subject to considerable discussion and consultation. Lavendon Parish Council considers that Field G13 is an integral part of the landscape surrounding Lavendon Village and Lower Farm in particular. It is accessed by a public right of way linking to the Three Shire Way and is used by many riders and walkers. Field G9 is directly adjacent to Lavendon Wood is also bounded by the Three Shire Way and a public right of way on the southern side of Lavendon Wood which is well used by walkers and riders. Both fields are therefore accessible to the general public and offer opportunity for enhancement for conservation of ground nesting birds displaced by the Solar farm and in the case of Field 13 by the introduction of flood prevention measures including swales and bunds. Lavendon Parish Council therefore fully supports the inclusion of fields G13 and G9 in the Special Landscape Area and proposes that a high weight is given to the policy and that Solar Panels are therefore excluded from them.</p>	<p>The Applicant acknowledges that the MK City Plan 2050 Regulation 19 consultation commenced on the 7 November for a six-week period. This has been further extended until the 16 February. The Applicant prepared an update to the <b>Planning Statement Revision B [EX4/GH7.15_B]</b> and the <b>Policy Compliance Document Revision B [EX4/GH7.23_B]</b> to reflect the update to the policy position. The Applicant is proposing to prepare a representation for submission into the Local Plan consultation in due course which sets out the Applicant's assessment of why fields GF9 and GF13 should not be designated as part of the extended SLA. This position is as per the Applicant's response to comment 'MKC-4.9' in <b>The Applicant's Responses to Local Impact Reports [REP2-049]</b>.</p> <p>The MKCP is currently at Reg 19 Consultation where emerging policies carry minimum weight.</p>





## 2.7 Richard Gregory [REP3-122]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
RG-001	Hydrology, Flood Risk and Drainage Agriculture and Soils	Topsoil and Permeability ExQ2 Q2.17.4	<p>May I refer you to Chapter 10 - Hydrology, Flood Risk, and Drainage. [ENO 10170/APP /GH6.3.10.10 ] GHS state that Green Hill G is underlain by clayey and limestone-rich soils, including the Oadby Member and Cornbrash Formation, which have naturally low permeability. These conditions were accounted for in the assessment of surface water run-off. But how? They do not match the conditions for permeable soils set out in the L M Cook report.</p> <p>However, in Document APP/GH722 -Water Framework Directive Assessment ref 8.2,1 Table 8 - During the Construction / Decommissioning phase Compaction of Soils. GHS state that topsoil should be cultivated in -line with BS3882. 2015 to a minimum depth of 400mm average over all planting areas or to a fine tilth over all areas to be seeded and include basic levelling with levels graded to falls. This specification would reflect the conditions in the L M Cook report.</p> <p>I pointed out that to achieve this specification over the whole of Area G would be environmentally unacceptable. So we are left with low permeability soils causing an increase in storm water run-off.</p>	<p>The Applicant notes the points on soils and agricultural land management. However, the flood risk conclusions for the Scheme are not dependent on an assumption of uniformly high infiltration across all fields.</p> <p>For the operational Scheme, panelled areas remain vegetated and permeable and drain to the existing ground. The drainage strategy for any increased hardstanding uses SuDS and flow control to restrict discharge to appropriate greenfield equivalent rates, with exceedance managed within the Order Limits. These Scheme-wide principles are set out in <b>Environmental Statement Chapter 10 [REP1-023]</b> and the <b>Flood Risk Assessment and Drainage Strategy Covering Report [REP1-053]</b>.</p> <p>The Applicant agrees that agricultural baseline conditions can include compacted headlands, tramlines, and locally low permeability soils, and that these influence runoff pathways. This is one reason the construction phase is treated as the governing risk period for runoff control. Construction-phase controls (including soil handling, trafficking controls, protection of existing field drainage, and decompaction and reinstatement) are secured through the <b>Outline Construction Environmental Management Plan [REP1-131]</b> and <b>Outline Soil Management Plan [APP-550]</b>.</p> <p>Accordingly, the Applicant does not agree that the soil points raised undermine the Scheme-wide conclusion that flood risk will not be increased off site.</p> <p><b>Outline Soil Management Plan [APP-550]</b> which will be further developed into a detailed Soil Management Plan preconstruction which will detail the mitigation measures on handling plastic and clayey soils in accordance with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. As stated in <b>Outline Soil Management Plan [APP-550]</b> and <b>ES Chapter 20: Agricultural Circumstances [APP-057]</b>, soils will be reconditioned to eliminate compact during soil reinstatement and there is a period of soil aftercare to check the reinstated soils by qualified Soil Scientist to ensure that soils are restored correctly, and any required remediation implemented.</p>
RG-002	Hydrology, Flood Risk and Drainage Agriculture and Soils	Topsoil and Permeability ExQ2 Q2.17.5	<p>The two photographs show the excavation operations to build an equestrian menage at Lower Farm in 2017. The excavator had to dig through the clay top soil and limestone bed rock and encountered blue clay at a depth of approx 1.5metres. to establish a level platform. The menage is located 2 metres South of the drainage channel and only 50 metres to the East of the Site G boundary. The ground conditions of Site G so close to these excavations must be similar although although the the depths at which the blue clay pockets are exposed may vary. These photographs visually demonstrate the lack of permeability of the ground conditions in this area. From past experience we know that during heavy rain storms the surface water run-off from both our fields and Site G quickly fills up the drainage channel but the levels also drop when the rain stops which reflect the fact that the clayey topsoil is not absorbing the water.</p>	<p>The Applicant notes the submission and the observation that excavated soils in the area can be clayey and exhibit low permeability. The Applicant does not dispute that locally impermeable soils can occur. However, the existence of low permeability soils is a baseline condition and does not, of itself, demonstrate that the Scheme will increase flood risk.</p> <p>The flood risk assessment does not rely on assumptions of high infiltration or freely draining soils. The Scheme-wide assessment in <b>ES Chapter 10: Hydrology, Flood Risk and Drainage (Revision A) [REP1-023]</b> and the <b>Flood Risk Assessment and Drainage Strategy Covering Report [REP1-053]</b> characterises flood risk using best available information and assesses the mechanisms by which the Scheme could alter runoff and flood pathways. The conclusion is that the Scheme will not increase flood risk elsewhere because the operational development does not introduce widespread impermeable surfacing across the solar array areas, which remain vegetated and permeable with rainfall draining to the existing ground surface. Where limited impermeable areas are required for infrastructure, these are drained</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>via SuDS and flow controls to restrict discharge to appropriate greenfield equivalent rates, with exceedance routing managed within the Order Limits. This approach is set out in <b>[REP1-053]</b> and the relevant annexes.</p> <p>The key credible pathway for any temporary increase in runoff is during construction, through soil compaction and disturbance of existing land drainage. These risks are addressed through secured commitments in the <b>Outline Construction Environmental Management Plan [REP1-131]</b> and the <b>Outline Soil Management Plan [APP-550]</b>, including measures to protect and reinstate existing drainage features and to manage trafficking, soil handling and reinstatement to avoid long-term compaction.</p> <p>Accordingly, the Applicant does not agree that the soil observation presented alters the conclusions of the flood risk assessment, or that it provides evidence that the Scheme will exacerbate existing baseline flooding issues or increase flood risk to off-site receptors.</p> <p><b>Outline Soil Management Plan [APP-550]</b> which will be further developed into a detailed Soil Management Plan preconstruction which will detail the mitigation measures on handling plastic and clayey soils in accordance with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. As stated in <b>Outline Soil Management Plan [APP-550]</b> and <b>ES Chapter 20: Agricultural Circumstances [APP-057]</b>, soils will be reconditioned to eliminate compact during soil reinstatement and there is a period of soil aftercare to check the reinstated soils by qualified Soil Scientist to ensure that soils are restored correctly, and any required remediation implemented.</p>