GREEN HILL
SOLAR FARM

Green Hill Solar Farm
EN010170

The Applicant's Responses to Local Impact Reports

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Contents

Issue Sheet

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Examination Deadline 4

The Applicant's Responses to Local Impact Reports

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides Green Hill Solar Farm Limited (the 'Applicant's') response to the comments on responses to Local Impact Reports (LIRs), relating to the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').

1.1.2 The comments on responses to LIRs were submitted to the Planning Inspectorate at Deadline 3 (17 December 2025) from the following local authorities:

- Milton Keynes City Council (MKCC) **[REP3-085]**
- North Northamptonshire Council (NNC) **[REP3-087]**

1.1.3 The comments on responses to LIRs were published on 18 December 2025 to the Planning Inspectorate's website (PINS Reference: EN010170).

1.1.4 Local authorities have worked proactively with the Applicant during the preparation of the Application and since its submission and the Applicant thanks officers for their time.

1.1.5 Sections 2-3 below sets out comments made by the above Local Authorities and the Applicant's responses to them. Where applicable, paragraph or page numbers are provided to assist cross referencing to the relevant LIR and/or comments.

1.1.6 Where paragraphs or sections have not been included, this has been done where the Applicant does not have any commentary to make on the text provided. This is done only for passages where the comments refer to factual statements, repetition of text from the Applicant's documents, or where directly quoting local policy or guidance to which the Applicant has responded to through the submission.

1.1.7 References to the Application and examination documentation, as submitted to the Planning Inspectorate on 23 May 2025, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'Green Hill Solar Farm Examination Library'. Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 4 to the Planning Inspectorate.

Table 1: List of Acronyms for Submission Documents

Acronym	Document Name
DCO	Development Consent Order
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
PRA	Preliminary (Geo-Environmental) Risk Assessment
OCEMP	Outline Construction Environmental Management Plan
OOEMP	Outline Operational Environmental Management Plan

Acronym	Document Name
ODS	Outline Decommissioning Statement
OLEMP	Outline Landscape and Ecological Management Plan
OEPMS	Outline Ecological Protection and Mitigation Strategy
OSMP	Outline Soil Management Plan
OBSSMP	Outline Battery Storage Safety Management Plan
OSSCEP	Outline Skills Supply Chain and Employment Plan
OCTMP	Outline Construction Traffic Management Plan
OPROWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
CDPP	Concept Design Parameters and Principles
EqIA	Equality Impact Assessment
HRA	Habitat Regulations Assessment
OOTMP	Outline Operational Traffic Management Plan

2 The Applicant's Responses to Milton Keynes City Council's Comments on 'Applicant Response to Local Impact Report'

Table 2: Applicant's Response to [REP3-085]

LIR Ref.	Topic Area	Summary	Applicant's Response
MKC 1.1	Introduction	This report sets out MKCC's response to the applicant's response, issued 21 November 2025 (issued at deadline 2), due 17 December 2025 (deadline 3).	The Applicant notes this comment.
MKC 4.7	Landscape and Visual Impact	Each site is a large solar array impacting on its local landscape. Construction of the large-scale solar farm on agricultural land cannot assimilate solar panels into the local landscape character, it fundamentally alters the local landscape character. It requires the local landscape character of unique composition of fields, hedgerows, woodland, trees, to change to screen out views of large fields overlaid with large areas of solid, reflective surfacing on south-facing land. Due to the height of the panels capable of 4.5m at full tilt, constantly tilting during the course of each day to maximise the solar gain, the open views of previously agricultural landscape are closed off from view by largescale mitigation planting which then becomes the defining feature of the local landscape character. The mitigation planting doesn't integrate or blend the solar farm into the landscape character; the mitigation creates a changed landscape character defined by the solar farm.	The LVIA takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The LVIA acknowledges a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure. Adverse effects remain through to the decommissioning phase, although reduced and no longer significant as a result of the establishment of the mitigation planting. NPS EN-1 recognises at paragraph 5.10.5 that "Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."
MKC 4.7	Landscape and Visual Impact	The solar array is the defining feature of the landscape they inhabit where they can/can't be seen.	The LVIA recognises that the mitigation planting would not completely screen views of the array from all

LIR Ref.	Topic Area	Summary	Applicant's Response
		The mitigation aims to screen out open views across the fields to hide the solar array. This significantly changes, and the mitigation becomes the defining feature of the local landscape character instead of the open views over agricultural landscape. Mitigation planting will not completely screen views of the array from every vantage and particularly for users of the footpaths and bridleways, the presence and perception of the arrays and fencing and cctv cameras will be felt and visible even through hedgerows when walking along existing and new footpaths.	locations. The LVIA takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The LVIA acknowledges that users of PRoW within and immediately alongside Site G would experience adverse effects for the lifetime of the Scheme, with significant adverse effects to users of routes passing directly through the Site until Year 15, at which point effects would remain adverse, but no longer significant as a result of the establishment of the mitigation planting. NPS EN-1 recognises at paragraph 5.10.13 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."* However, for the reasons set out within **[REP2-049]** Applicant Responses to Local Impact Reports MKC4.7 the Applicant maintains that the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational. NPS EN-1 recognises at paragraph 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."*
MKC 4.7	Landscape and Visual Impact	The existing framework of vegetation is not enough to screen the solar farm. The existing landscape structure along with the open agricultural fields informs the local landscape character but the existing	The LVIA takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites

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		vegetation alone would not enable the solar array to sit 'comfortably and not become intrusive within the landscape'. Views towards the horizon are particularly vulnerable and views of the solar array can only be mitigated by screening off previously open views by the inclusion of supplementary planting. The planting and views of the solar farm infrastructure then become a defining feature and detractor of a changed local landscape character.	themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure and that there would be adverse effects to both landscape character and visual amenity as a consequence of the Scheme. The mitigation proposed for Site G does not solely rely upon the existing framework of vegetation. The landscape mitigation proposes: Green Corridor & Woodland Planting: 3.04ha Enhanced Riparian Native Planting: 1.66ha Hedgerow Reinforcement & Reinforced Roadside Vegetation: 1.3km Proposed Hedgerows: 4.19km Groundcover: 159.16ha
MKC 4.7	Landscape and Visual Impact	Established planting will help to mitigate, not eliminate, adverse effects. This isn't a benefit but a designed treatment to address the issue of screening an industrialising use of the countryside that is deemed as unattractive. But in doing so the screening is closing off the views of currently attractive countryside that people enjoy and would prefer to see. The figures quoted relating to the benefits of mitigation demonstrates the quantity of landscape change proposed using hedgerows and woodland in order to screen, green and soften the view of large swathes of solar panels replacing existing views across open countryside. Green corridor is a typology of planting associated with urban development. It is intended to	The Applicant notes these comments and directs MKCC to NPS EN-1 which recognises at paragraph 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation"* and to NPS EN-1 which recognises at paragraph 5.10.13 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."* The LVIA acknowledges that users of PRoW within and immediately alongside Site G would experience adverse effects for the lifetime of the Scheme, with significant adverse effects to users of routes passing directly through the Site until Year 15, and with adverse effects

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		establish screening alongside footpaths / bridleways but in doing so risks creating uncomfortable routes where views out across open countryside will be closed off. Riparian planting, ponds, scrapes, groundcover are more closely associated with ecology benefits than a benefit for landscape character	continuing throughout the lifetime of the Scheme. The changes to the outlook from these sections of PRoW as a consequence of the mitigation proposals is a consideration of the assessment of effects to users of these sections of PRoW.
MKC 4.7	Landscape and Visual Impact	Ecological mitigation can be a benefit of the landscape design. However, the primary function of BNG is not to mitigate the impact on visual amenity or landscape character resulting from a large solar farm development. The landscape character won't be returned to its original condition, the screened off views along public rights of way will not be reopened by removing established hedgerows and trees as part of a restoration scheme. The post landscape character will still be defined by the landscape buffers and screening vegetation of its former use. The solar development will forever leave an imprint in the landscape, it requires a designed landscape that will change existing local landscape character, not reinforce it in a beneficial way.	At decommissioning, agricultural fields would be returned to agriculture. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Therefore, following the decommissioning of the Scheme, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing

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			biodiversity and in promoting the resilience of ecosystems.
MKC 4.7	Landscape and Visual Impact	MKCC maintain the position that the fields assessed as Special Landscape Area (SLA) should be removed from the development proposal to protect the best quality local landscape character in the countryside from harmful development.	The Applicant notes this comment. The Applicant maintains its position outlined in response MKC-4.9 in the **Applicant's Responses to Local Impact Reports [REP2-049]**. It is understood that the MKCP is currently at Regulation 19 consultation, during which emerging policies carry limited weight. As noted in the LIR, the Inspector may need to seek the Council's view on the extent to which these policies should be afforded weight at the point of determination. The Applicant will submit a formal response to the proposed SLA as part of the Regulation 19 consultation.
MKC 4.9	Landscape and Visual Impact	With regard to emerging policy in the Milton Keynes City Plan, there is an element of conflict between 'Policy GS7: Wind Turbine and Solar PV Spatial Strategy' strategy and 'Policy CEA12: Conserving and Enhancing Landscape Character/Special Landscape Areas'. The emerging policies currently carry minimal weight, but the evidence base, particularly the consideration of landscape character which informs the proposed SLA, is robust and well considered. Therefore, these fields assessed as SLA should be removed from the development proposal. MKCC disagree that the solar farm development would enhance the landscape of areas assessed as special landscape.	The Applicant notes this comment and refers to the response immediately above. However, the Applicant confirms that the LVIA acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure and that this would result in a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure. Adverse effects remain through to the decommissioning phase, although reduced and no longer significant as a result of the establishment of the mitigation planting.

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			The Applicant notes within the emerging policies that the Scheme is located within the preferred area for solar development, in line with emerging Policy GS7 and therefore, the principle of development for the scheme is considered acceptable. Suggesting there is a conflict between the designation of the preferred area for solar development which the Scheme is located within and the proposed extension of the Special Landscape Area; indicating that solar is not inherently incompatible with the proposed SLA in this location.
MKC 4.10-4.11	Landscape and Visual Impact	It is not accepted that the mitigation measures set out as shown on ES Figure 4.20 Landscape and Ecology Mitigation Plan G [APP-219] are considered appropriate and acceptable. The Landscape and Ecology Mitigation Plan for Site G fails to deliver all the necessary mitigation needed to protect views.	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 views and visibility of the landscape are taken into account. The methodology for the LVIA conforms to the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment and has been progressed and agreed with the Local Planning Authorities. The landscape mitigation does not attempt to provide zero visibility of the proposals. Landscpae mitigation has been proposed to support Landscape Character and provide Legacy Landscape benefits. Additionally, the mitigation measures proposed comply with NPS EN-3 by *"minimising the landscape and visual impact"* of the Scheme. The Applicant notes that NPS EN-1 recognises at paragraph 5.10.13 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."*

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MKC 4.10-4.11	Landscape and Visual Impact	Woodland belts are proposed to protect most views from the A509, but these are not included along the A428 and should be.	Landscape mitigation alongside the A428 includes for *'Proposed Secondary Native Species Rich Hedgerow With Densely Spaced Native Hedgerow Trees'*. This comprises the planting of a new hedgerow adjacent to an existing hedgerow which would also be planted with new native trees. The management of the existing hedgerows would facilitate vertical growth, with the OLEMP **[REP3-062]** requiring that the shrubby element of hedgerows (excluding hedgerow trees) will be maintained to an optimum height of 4- 4.5m tall. The *'Secondary Native Species Rich Hedgerow With Densely Spaced Native Hedgerow Trees*' is proposed along the entirety of the Site G's southern boundary with the A428, and in combination to the management prescriptions of the existing hedgerow are considered appropriate to provide screening of the infrastructure within Site G for users of this busy section of highway.
MKC 4.10-4.11	Landscape and Visual Impact	There are clear views available along the A428 south of the pylons which intersect parcel GF13 along the southern-most section of road / solar development and at the southernmost corner of the parcel. The viewpoint VP53 is selective in that it does not identify the location where there is a stretch of clear views into the site from the A428. Mitigation here should be bolstered by the inclusion of Proposed Native Woodland Copse/Shelter Belt (Scrub and Tree Planting) in this portion of the site; instead of the proposed hedgerow. Where the Bridleway 015 crosses the A428 additional woodland buffer is needed here to screen the development.	The Applicant notes this comment, however, is confident that the planting as proposed is suitable to mitigate visual effects associated with users of the A428 to the south of Site G.

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MKC 4.10-4.11	Landscape and Visual Impact	There are clear views available along the A428 along the edge of parcels GF10 and GF12 during winter in particular and due to the rising topography of the site towards the north. The viewpoint VP40 demonstrates the rising topography and vegetation in full leaf. A hedgerow is already proposed in addition to the existing hedgerow. However, mitigation here should be bolstered by the inclusion of Proposed Native Woodland Copse/Shelter Belt (Scrub and Tree Planting) in this portion of the site; to achieve more effective mitigation.	The Applicant notes this comment, however, is confident that the planting as proposed is suitable to mitigate visual effects associated with users of the A428 to the south of Site G.
MKC 4.10-4.11	Landscape and Visual Impact	Although views from the Milton Keynes Boundary Walk (MKBW) looking eastwards are largely screened by the inclusion of woodland buffer there are less well screened views westwards from the MKBW across the solar development where the associated infrastructure has the potential to be visually obtrusive. Such as but not exclusively from viewpoint VP36. Photomontages indicate that the Proposed Substation will not be visible due to the scale of solar development in the foreground. Only Proposed River Corridor Planting for flooding is proposed along the westside of the MKBW. Unlike woodland or hedgerow this will not offer sufficient visual mitigation. Also, we note that the Proposed River Corridor Planting for Flooding for Site G is not listed in the OLEMP unlike the other sites.	The *'Proposed River Corridor Planting For Flooding'* along the eastern side of the ditch which runs alongside the MKBW is intended to provide reinforcement to the existing tree belt in this location with the planting consisting of densely planted native riparian shrub. Planting for Site G is acknowledged in paragraph 4.5.3 and in the total areas of habitat covered by paragraph 4.5.5.
MKC 4.10-4.11	Landscape and Visual Impact	All planting typologies included on the Landscape and Ecology Mitigation Plan should be clearly specified and included in the OLEMP for Site G, currently they are not accurately crossreferenced, and differences exist between typologies on the drawing and	The OLEMP **[REP3-062]** sets out a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme. A detailed Landscape and Ecological Management Plan would be produced following consent

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		typologies described in the OLEMP. For clarity, the typology references should be identical. Ultimately, this could result in issues regarding implementation and expectations.	of the Scheme and is secured through Requirement 7 of the draft DCO **[REP3-024]**. The OLEMP is primarily prepared in language to align to BNG requirements, however the language used to describe the proposed mitigation shown on the Landscape and Ecology Mitigation Plans is written to clearly set out the various mitigation types. These types often span multiple BNG habitat types, but can be cross referenced to the appropriate habitats within the OLEMP: • Existing vegetation to be retained and enhanced: Section 4.6 Permanent Grassland Habitats, Paragraph 4.6.1. • Proposed meadow creation (Beneath Panels):Section 4.6 Permanent Grassland Habitats, Paragraph 4.6.1. • Proposed Tussock Grassland Margins: Section 4.6 Permanent Grassland Habitats, Paragraph 4.6.1. • Proposed Native Woodland Copse/Shelter Belt (Scrub and Tree Planting): Section 4.4 Woodland Copse and Shelterbelt, Paragraph 4.4.1, 4.43 and 4.4.4. • Dense Linear Tree Planting (Without Scrub Planting): Section 4.4 Woodland Copse and Shelterbelt, Paragraph 4.4.7. • Native Tree and Scrub Planting - Instant Screening: Section 4.4 Woodland Copse and Shelterbelt.

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			• Proposed River Corridor Planting for Flooding: Section 4.5 Scattered Trees with Native Shrub, Paragraph 4.5.1 and 4.5.3 - 4.5.4. • Existing Hedge to be reinforced with irregularly spaced native tree planting: Section 4.3 Native Hedgerows and Hedgerow Trees, Paragraph 4.3.1 and 4.3.5. • Existing hedge to be reinforced with densely spaced native tree planting: Section 4.3 Native Hedgerows and Hedgerow Trees, Paragraph 4.3.1 and 4.3.5. • Proposed native species rich hedgerow with irregular spaced native hedgerow trees: Section 4.3 Native Hedgerows and Hedgerow Trees, Paragraph 4.3.1 and 4.3.7 - 4.3.12. • Proposed secondary native species rich hedgerow with densely spaced native hedgerow trees: Section 4.3 Native Hedgerows and Hedgerow Trees, Paragraph 4.3.1 and 4.3.7 - 4.3.12.
MKC 4.10-4.11	Landscape and Visual Impact	The 'landscape-led approach' has ignored the assessment of SLA. The selection and siting of the solar development on two field parcels of Site G (the GF9 and GF13 field parcels east of Lavendon bridleway BW 15) took place before the design approach knew MKCC had any SLAs. Despite feeding back through meetings between the landscape design consultants and MKCC, highlighting the incompatibility of SLA and large-scale solar development; the design development of the scheme has not altered to recognise the need for careful siting to avoid	The Applicant maintains its position outlined in response MKC-4.9 in the **Applicant's Responses to Local Impact Reports [REP2-049]**. It is understood that the MKCP is currently at Regulation 19 consultation, during which emerging policies carry limited weight. As noted in the LIR, the Inspector may need to seek the Council's view on the extent to which these policies should be afforded weight at the point of determination. The Applicant will submit a formal

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		impinging on land identified as locally attractive landscape in the Ouse Valley Special Landscape Area. The 'iterative approach' has failed to recognise the assessment of the SLA. A refined iteration should remove these fields from the proposal. Their inclusion as part of the solar development would be detrimental to their landscape character.	response to the proposed SLA as part of the Regulation 19 consultation. The Applicant notes within the emerging policies that the Scheme is located within the preferred area for solar development, in line with emerging Policy GS7 and therefore, the principle of development for the scheme is considered acceptable. Suggesting there is a conflict between the designation of the preferred area for solar development which the Scheme is located within and the proposed extension of the Special Landscape Area; indicating that solar is not inherently incompatible with the proposed SLA in this location.
MKC 4.15	Ecology and Biodiversity	It is agreed it would not have been proportional to undertake night-time bat walkover surveys across all sites in the first instance however, where the data collected identified areas of greater interest, additional targeted surveys are proportionate to fully understand impacts on Important Ecological Features. Static surveys have significant limitations when used in isolation, which is why they are usually undertaken alongside other survey methods. The applicant's response does not address the concerns raised and the council maintains that an accurate assessment of the potential impacts on Barbastelle cannot be established based on the limited survey work undertaken. Based on local knowledge and experience, the levels of Barbastelle activity recorded are significant for the Milton Keynes Area. Typically, Barbastelle are not frequently recorded and when they are, it's at very low levels. The levels recorded for this site are the highest I have seen on any application	Barbastelle bats are typically associated with woodland and pastoral landscapes. At Green Hill G, aside from the offsite ancient woodland abutting the Site to the north, the Site itself offers limited foraging value to barbastelle, being dominated by intensive arable farmland. Internal hedgerows are generally of poor quality, with the outer boundary hedgerows offering more suitable foraging and commuting structures. Static bat detector surveys recorded high levels of barbastelle activity at locations SD38, located on the western Site boundary, and SD41 on the northern edge of Field GF13 in the south-eastern corner. The Applicant would like to reiterate that impacts upon foraging and commuting bats have been considered at an early stage of the Scheme, and impacts have been largely designed out through the retention of boundary habitats, including woodland, hedgerows and watercourses. Proportionate, undeveloped buffer zones

LIR Ref.	Topic Area	Summary	Applicant's Response
		within MKCC and as such, there is a significant concern that the adjacent woodland and linking boundary features are of high importance to this species locally.	are specified, including a minimum: 30m from ancient woodland, 20m from other woodland, 15m from hedgerows and streams, and 8m from ditches. Some minor hedgerow losses will be incurred, but this will be limited to a small number of gaps, of a limited extent. Moreover, existing hedgerows will be enhanced, and significant new planting instated, to bolster existing commuting corridors. Hedgerow loss at Green Hill G is limited to the widening of a single existing access off the A428 to the south of the Site, resulting in approximately 4.5m of hedgerow loss. No other significant losses are currently anticipated on the Site. Significant enhancement to the boundary habitats is proposed, including strengthening the eastern and western Site boundaries with new hedgerow, tree and scrub planting. Given the findings of the extensive baseline survey dataset collected, as well as the retention, protection and enhancement of the boundary habitats and the low value of the open fields, a further survey is not considered likely to influence the design of mitigation at Green Hill G, and is therefore considered disproportionate.
MKC 4.15	Ecology and Biodiversity	It is also not possible to design and implement a robust mitigation strategy without knowing the number of Barbastelle to be affected or the importance of the boundary features where high levels of activity were identified. If, for example, the areas of high activity form an essential commuting route to and from a maternity colony, the potential impact on this corridor could be highly detrimental to the local population.	As discussed in response to the previous point, MKC 4.15, the embedded mitigation measures which retain and protect the boundary habitats with wide, undeveloped buffer zones, will ensure that existing commuting corridors are preserved. The preservation of these commuting corridors will also retain the most valuable foraging habitats (woodland, hedgerows and

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		Barbastelle are also known to travel long distances to forage therefore, any loss of connectivity to foraging resources can also have a detrimental impact on local populations. As the effect of solar panels on bat activity is largely unknown, a more precautionary strategy is likely to be necessary to reduce the risk of harm as far as possible.	ditches). These measures constitute a precautionary approach. Knowing the exact number of barbastelles within the Site would be difficult to ascertain via any survey methodology, and the abundance of this species is not a pertinent factor in the design of the mitigation given that impacts are avoided. It is therefore considered that, even in the event that additional survey work (such as Night Time Bat Walkover Surveys) was completed and barbastelle were recorded using Green Hill G, this would not have resulted in any significant changes to the mitigation proposed. Moreover, the boundary habitats will be enhanced with supplementary planting to strengthen their functionality for both foraging and commuting. The solar panels will all be sited within the open fields, which currently comprise low value arable habitats, set back from the retained boundary habitats. The arable fields will be enhanced to grassland during operation of the Scheme, which will offer elevated foraging habitat for barbastelle and other bat species. Overall, these measures will avoid any adverse effects and are predicted to bring positive residual effects.
MKC 4.14 – 4.17	Ecology and Biodiversity	The applicant's response in relation to Skylark appears to rely on an article published in CIEEM In Practice dating from 2022. However, this article, which aimed to provide an alternative approach to Skylark mitigation (referred to as an alternative mitigation metric), makes a number of points which the applicant has not fully acknowledged in their response.	The In Practice article was written by Harry Fox, who works for the Applicant's Ecologists, and who has also been involved in the design of the skylark mitigation strategy for Green Hill Solar Farm. The article seeks to offer a metric for skylark mitigation in the absence of any existing standard. This metric has been used as the basis for the Green Hill skylark mitigation strategy as, in

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			the view of the Applicant's Ecologist, it offers the best available methodology for ensuring the that potential impacts on skylark are quantified and fully considered within ecological impact assessment. This assessment methodology has also been used previously on the Cottam and West Burton Solar NSIP applications and accepted.
MKC 4.14 – 4.17	Ecology and Biodiversity	If the applicant is relying on this alternative mitigation metric, they have provided no associated calculations to support their conclusions or evidence their approach (across all the sites or for individual sites). For Site G, which is the only site within Milton Keynes, no mitigation fields appear to be proposed for this site meaning in Milton Keynes the applicants strategy relies entirely on enhancement of foraging habitat and displacement of pairs into neighbouring habitats which is not agreeable.	The baseline conditions relating to Breeding Birds are set out in detail in **Environmental Statement Appendix 9.8 Breeding Bird Surveys [REP1-051]**. **Table 9** of this report sets out the number of skylark territories within each Green Hill Site, and the overall number across the Scheme. Corresponding territory densities (no. territories per hectare) are also given. **Figure series 9.8.1-9.8.7** within the breeding bird appendix shows the indicative skylark territory cores across the Scheme, and whether they are retained, lost, or considered 'absorbed' by virtue of enhanced adjacent foraging habitat, as a result of the proposals. Within the **Environmental Statement Chapter 9: Ecology and Biodiversity [REP1-033]**, **paragraphs 9.9.248-9.9.251**, along with **Table 9.6**, set out how skylark territories are to be mitigated (with calculations). This concludes that 45.6% of the baseline territories will be retained or mitigated, across the Scheme. Given the variability in the territory densities across the sites, and the varied, multi-disciplinary considerations surrounding which fields were put forward for solar development, the Scheme seeks to provide skylark mitigation as a whole, and not Site-by-Site. Skylark territory losses are

LIR Ref.	Topic Area	Summary	Applicant's Response
			relatively high at Green Hill G, but mitigation is provided across the Scheme at the county population level.
MKC 4.14 – 4.17	Ecology and Biodiversity	The article sets out the potentially negative consequences of presuming adjacent habitat can adsorb displaced pairs "if the carrying capacity of neighbouring habitat allows, some degree of 'absorption' into the surroundings is theoretically possible. Where sites are in proximity to heaths, moorland or coastal grassland this may be more likely. However, in intensive arable landscapes, this is less so and an acceleration of a decline of local breeding success is possible, especially in combination with other development." Step 3b does set out that the need of compensation may be reduced by enhancement to foraging habitat however, it does not state that enhancement of foraging habitat alone would provide sufficient compensation for loss of territories. The worked example in the article simply shows a reduced amount of compensation may be appropriate in that instance. It is therefore maintained that adequate compensation for loss of nesting habitat must also be provided. In combination with enhancement to foraging habitat, this would be an appropriate compensation strategy. Step 4 of the alternative mitigation metric highlights the importance of establishing the density of territories within the proposed receptor site. Currently, the applicant is assuming the adjacent habitat can absorb displaced skylark pairs. However, they have provided no calculations to support this assumption (e.g.	Designated mitigation fields for skylark are provided wholly within the Green Hill sites, which were fully subject to baseline surveys. Therefore, the baseline territory densities of these fields are known, and have been factored into the mitigation strategy (whereby fields are enhanced to increase their carrying capacity above baseline levels). This is detailed within **Table 9.6** of the **Environmental Statement Chapter 9: Ecology and Biodiversity [REP1-033]**. All skylark territories considered 'retained' are located within undeveloped mitigation fields, which will be managed as suitable habitat for skylarks throughout the operational phase. 'Lost' territories are those territories which will be displaced through the installation of solar infrastructure. Skylark productivity is a combination of the availability and quality of both suitable nesting habitat and suitable foraging habitat. The elevated foraging value of the Sites will enable a higher carrying capacity of territories within adjacent land, so long as this adjacent land is suitable for nesting and within an appropriate foraging range. Baseline surveys of adjacent land outside of the Order Limits have not been conducted, but the suitability of these fields for nesting has been appraised via satellite imagery to understand the current land use. 'Absorbed' skylark territories are those territories which lie at the edge of the Sites, within 200m of suitable nesting habitat (typical core foraging range), and which may be

LIR Ref.	Topic Area	Summary	Applicant's Response
		baseline territory density for receptor sites or net change of territory density before and after enhancement etc.).	considered mitigated by virtue of the enhanced foraging resources conferred by the Site's operational habitats.
MKC 4.14 – 4.17	Ecology and Biodiversity	As a result, the submitted response has not addressed the concerns raised regarding the proposed Skylark Mitigation Strategy within Milton Keynes. It is maintained that an appropriate mitigation strategy must include provision for both enhanced foraging and nesting opportunities in the borough. Simply providing additional foraging opportunities and assuming adequate nesting opportunities will exist on adjacent land is not sufficient to provide adequate mitigation, particularly as no mitigation fields are proposed within our jurisdiction.	Across the Scheme, designated mitigation fields within the Sites provide both suitable nesting and foraging habitat. These fields retain a number of territories, and sensitive management will enhance their carrying capacity. Additionally, a proportion of displaced territories are considered 'absorbed' by virtue of the enhanced foraging resources within the array fields, which whilst unsuitable for nesting may still be utilised by foraging birds. These territories are only considered absorbed where currently suitable nesting habitat exists offsite within foraging range (taken to be 200m). The Scheme offers mitigation for skylarks as a whole, at the level of the county's population, rather than Site-by-Site. This approach is considered justified given that the ecological impacts of the Scheme are assessed at a landscape scale, and therefore proposed mitigation has also been considered and delivered at a landscape scale, rather than at the borough or county scale.
MKC 4.19 – 4.20	Ecology and Biodiversity	Milton Keynes Local Policy requires applicants to provide faunal enhancements as part of their BNG strategy and as discussed previously, it is expected features will be provided at a ratio of three features per ha in line with other solar applications in the borough.	For context, Green Hill G is approximately 171ha in size, and three habitat features per hectare equates to 513 features in this Site alone. Not only is this considered disproportionate, but the density of bird boxes could well be so high as to render some features redundant. Moreover, the practicality of installing this many features on suitable trees within the hedgerow network is questioned.

LIR Ref.	Topic Area	Summary	Applicant's Response
			Given the scale of the Scheme and as per Section 4.10 of the **Outline Landscape and Ecological Management Plan (Revision A) [REP1-137]**, habitat boxes provided as ecological enhancements have been calculated based on the lengths of hedgerow present within the Scheme, with one bird box provided for every 1km of hedgerow (totalling 91 boxes), and one bat box provided for every 2km of hedgerow (totalling 46 boxes). Given that the Scheme has sought to minimise losses of roosting and nesting habitats through sensitive design, and that the provision of these boxes does not serve as mitigation but as an enhancement only, this level of habitat box provision is considered appropriate and proportionate. Additional enhancement features will also be provided, including habitat piles, alongside large-scale habitat improvements.
MKC 4.24 – 4.27	Hydrology and Flood Risk	We have reviewed the supporting 'Hydraulic Modelling Technical Note - Lavendon Flood Alleviation Study' provided. We note the modelling approach taken as well as the number of options assessed. The summary states based on the current modelling information available there would likely be minimal benefit in mitigation measures being implemented within the red line boundary of the site for reducing existing flood risk downstream within Lavendon village. However, the LLFA notes the positive inclusion that the Applicant remains open to engagement with the LLFA on any future flood alleviation schemes should opportunities for offsite betterment arise. The LLFA would reiterate that MKCC is currently following central government	The Applicant welcomes MKCC's review of the supporting **Hydraulic Modelling Technical Note: Lavendon Flood Alleviation Study [REP2-053]**, including the modelling approach and the range of options assessed. The Applicant notes MKCC's acknowledgement of the study conclusion that, based on the modelling information available, mitigation measures implemented solely within the Scheme Order Limits are likely to provide minimal benefit in reducing existing flood risk downstream within Lavendon village. The Applicant agrees that this reflects the nature of flooding mechanisms affecting Lavendon, which are influenced by multiple interacting flow paths and rainfall driven processes across the wider catchment beyond the Scheme boundary.

LIR Ref.	Topic Area	Summary	Applicant's Response
		investment procedure to obtain the necessary grants to tackle reoccurring flood risk issues in Lavendon.	The Applicant also welcomes MKCC's recognition of the Applicant's commitment to ongoing engagement should opportunities for off-site betterment arise, and notes MKCC's current central government investment procedures to obtain grant funding to tackle recurring flood risk issues in Lavendon. The Applicant remains open to continued engagement with MKCC regarding any future flood alleviation proposals, noting that any such wider alleviation scheme would be separate from, and additional to, the Scheme's mitigation, which is focused on ensuring that the Scheme does not increase flood risk elsewhere. The Scheme-wide approach and conclusions are set out in **ES Chapter 10: Hydrology, Flood Risk and Drainage (Revision A) [REP1-023]** and the **Flood Risk Assessment and Drainage Strategy Report (Revision A) [REP1-053]**.
MKC 4.24 – 4.27	Hydrology and Flood Risk	Temporary drainage measures will be implemented during construction phase of the works. Solar panels will be raised to allow overland flow, set back at least 9.0 m from watercourses and surface water runoff from the 1 in 100 year plus 40% uplift for climate change event will be managed within the site through infiltration or controlled discharge. The proposed surface water drainage approach is acceptable in principle, and subject to securing detailed design through the DCO requirements as well as establishing an approach for approval of works to ordinary watercourses with confirmation that no diversions, culverts or obstructions proceed without LLFA agreement, the impacts on surface water management / drainage is expected to be compliant	In relation to surface water management and drainage, the Applicant welcomes MKCC's confirmation that the proposed approach is acceptable in principle. The Applicant confirms that temporary drainage measures will be implemented during construction, that solar panels will be raised to maintain overland flow pathways, and that set-backs from watercourses will be implemented. The Scheme drainage strategy is to manage runoff from the 1 in 100 year plus 40% climate change rainfall event within the site through infiltration where feasible and controlled discharge where required, with exceedance managed within the Order Limits. These principles are set out in **ES Chapter 10 (Revision A) [REP1-023]** and the **Flood Risk Assessment and Drainage Strategy Report (Revision A) [REP1-053]**,

LIR Ref.	Topic Area	Summary	Applicant's Response
		with Plan:MK and National Standards for Sustainable Drainage Systems (SuDS).	with construction-phase measures secured through the **Outline Construction Environmental Management Plan (Revision A) [REP1-146]** and **Outline Soil Management Plan (Revision A) [REP1-142]**. Detailed drainage design will be progressed post-consent in consultation with MKCC as LLFA and secured through the DCO Requirements. The Applicant also confirms that any works affecting ordinary watercourses will be progressed through an agreed approval route with MKCC, and that no diversions, culverts or obstructions will be undertaken without MKCC's agreement and the necessary consents. On this basis, the Applicant agrees with MKCC that the Scheme surface water management and drainage approach is expected to be compliant with Plan:MK and the National Standards for Sustainable Drainage Systems.
MKC 4.37 – 4.42	Transport and Access	Following comments on the access to site G the applicant has submitted revised tracking drawings to be consistent with the proposed HGV routes. However, this still shows an HGV entering the site would have to use the full access width so would have to wait on the main carriageway if a vehicle was leaving the site. The applicant proposes to address this by a banksman controlling when a vehicle can exit to reduce the possibility of a conflict but this appears a little arbitrary and the Council would prefer the access to be widened as previously requested.	A revised drawing showing how a vehicle may access and egress the site at the same time has been prepared to address the comment raised by MKCC. Please see **Green Hill G - Access 1 - Revised General Arrangement [EX4/GH8.2.10].**
MKC 4.37 – 4.42	Transport and Access	The applicant has now provided vehicle numbers for the cable route corridor access on the A509. These would be 11 arrivals per day during the haul road	The vehicle movements figures provided are the peak or maximum daily numbers which might occur. Movements at other times within this construction period will be

LIR Ref.	Topic Area	Summary	Applicant's Response
		construction period although it is noted not all would be articulated vehicles. This number, whilst not excessive is not insignificant as it represents 22 movements 2 way. The Council would therefore request an estimate of the haul road construction period before making a final comment.	expected to be lower. Movements are also spread across the day rather than compressed into arrival and departure periods. The access is also expected to operate as a left-in / left-out arrangement, minimising turning movements on the A509 by removing opportunity for right turn movements across traffic. The access will be available for the majority of the construction period but with varying degrees of usage as described above.
MKC 4.43 – 4.45	Transport and Access	Additional information has now been submitted giving more detail on shuttle buses and control of travel times. The points raised in this section are therefore considered to be addressed and it is accepted the level of traffic generation within the Milton Keynes area is not excessive.	The agreement in relation to traffic generation is noted.
MKC 4.46 – 4.49	Transport and Access	It is now accepted that the level of traffic impact on the Milton Keynes highway network is not severe. The concerns around access to site G remain	The agreement in relation to traffic generation is noted.

3 The Applicant's Responses to North Northamptonshire Council's Local Impact Report Landscape and Visual Matters: Comments on Applicant Response

Table 3: Applicant's Response to [REP3-087]

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.24 – 8.25	Assessment of Landscape Sensitivity	The Council acknowledges the Applicant's explanation of how sensitivity has been derived. The Applicant has provided a structured assessment that considers both value and susceptibility, and the Council agrees that this aligns with recognised methodology. In general terms, the Council also agrees with the sensitivity ratings applied across much of the study area.	The Applicant notes this comment.
NNC 8.24 – 8.25	Assessment of Landscape Sensitivity	Notwithstanding this broad agreement, the Council maintains that certain sites exhibit characteristics that justify a higher degree of susceptibility than reflected in the ES. In particular, Site F displays more noticeable topographic variation than other parts of the scheme, creating a landscape that is more open to perceptual changes and appreciation of the countryside. Even where direct visibility is intermittent or filtered, the underlying landform means that solar development would sit within a more visually sensitive setting compared with flatter or more enclosed sites.	The Applicant notes this comment and maintains the findings of the LVIA are sound and robust.
NNC 8.24 – 8.25	Assessment of Landscape Sensitivity	However, it is important to emphasise that this represents a matter of professional judgement on a limited number of sites. The Council agrees that the sensitivity assessment is otherwise	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		predominantly sound and consistent, with differences confined to specific locations where local character and landform introduce differing susceptibility and in turn, sensitivity.	
NNC 8.34 – 8.35	Residual Visual Effects and Viewpoint Clarification	The Council appreciates the Applicant's confirmation of baseline information and accepts that an error was made in the LIR regarding VP31 and agrees with the justification set out in Applicants Response (Document Reference: EX2/GH8.1.14) for VP16 and VP32.	The Applicant notes this comment.
NNC 8.34 – 8.35	Residual Visual Effects and Viewpoint Clarification	In respect of Easton Lane, the Council has carefully considered the Applicant's position but maintains that the level of visual change remains understated in some cases. From Easton Lane (TR080), where rising landform, open skylines and a sense of rural remoteness contribute to a more sensitive visual experience than reflected in the ES. While the Council recognises the Applicant's position, the magnitude of change in our judgement, is slightly greater than reported.	The Applicant notes this comment and maintains the findings of the LVIA are sound and robust, however notes the Councils recognition of differences in professional opinion.
NNC 8.36	Landscape Fabric	The Applicant is correct that new hedgerow, woodland and riparian planting would enhance certain physical elements of the landscape, and the Council wishes to emphasise that it is not opposed to these proposals. Strengthened field boundaries, riparian buffers and new habitat areas are recognised as positive contributions to the ecological and structural qualities of the setting.	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
NNC 8.36	Landscape Fabric	The LVIA Methodology (GH6.3.8.1_ES Appendix 8.1) defines landscape fabric as the tangible elements or features that make up the landscape, including landform, woodland, hedges, tree cover and vegetation. GLVIA3 paragraph 7.25 further explains that landscape effects arise from changes to individual elements or features of the landscape and from the introduction of new elements or features. This is an important clarification because it confirms that all newly introduced features influence landscape fabric. In this case, the new hedgerows, woodland and habitats would contribute positively, while the solar arrays, fencing, access tracks, substations and associated infrastructure also constitute new elements that materially change the landscape fabric.	The Applicant notes this comment.
NNC 8.36	Landscape Fabric	Although the additional planting would enhance certain components of the fabric, the Council's concern relates to the replacement of agricultural land use with utility-scale energy infrastructure. Land use is itself a tangible and central component of landscape fabric, contributing significantly to both the appearance and the functional character of the countryside. The introduction of extensive energy infrastructure represents a substantial and enduring alteration that cannot be balanced solely by reinforcing vegetative structure. Even in locations such as Site E, where public views	The LVIA acknowledges that there would be an immediate change to the character of the Sites themselves as a result of the land use change from the existing agricultural use to solar infrastructure and that appreciation of this change would extend into the immediate surroundings resulting in a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. Adverse effects remain through to the decommissioning phase, although reduced and no longer significant as a result of the establishment of the mitigation planting.

LIR Ref.	Topic Area	Summary	Applicant's Response
		are limited, the presence of new industrial elements across large land parcels results in a meaningful transition in landscape fabric and the character associated with it.	
NNC 8.36	Landscape Fabric	When applying the principles set out in GLVIA3 paragraph 7.25, the beneficial effects of the proposed planting must therefore be considered alongside the extensive introduction of engineered and functional elements. At the most generous interpretation, these contrasting influences could result in a neutral overall effect on landscape fabric. However, given the scale and nature of the new infrastructure relative to the planting proposals, the Council considers that the residual effect would remain slightly adverse.	The Applicant's position is that at Year 15, there would be a moderate beneficial effect on landscape fabric delivered through the substantial quantum of new planting that would be implemented as part of the Development: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.14km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and • 1,079.53ha of groundcover.
NNC 8.38 – 8.39	Landscape Character Effects	The Council notes the Applicant's reaffirmation of the ES conclusions and accepts that the term "blanket weighting" may not be the best term to describe the approach taken. However, the Council remains concerned that the concluding judgements for landscape character are essentially the same across all sites and at various scales.	The Applicant notes this comment.
NNC 8.38 – 8.39	Landscape Character Effects	The Council also notes the Applicant's statement that the development can be accommodated without undue adverse effects.	With regard to Site E, the LVIA identifies significant adverse effects at construction and Year 1, reducing to no longer significant at Year 15. The term 'no undue

LIR Ref.	Topic Area	Summary	Applicant's Response
		This is not consistent with the Applicant's own findings in EN010170- 000857-GH6.3.8.3_A_ES Appendix 8.3 (Revision A), where the LVIA Assessment Sheets clearly identify significant adverse effects on landscape character within the 1 km Study Area at Construction and at Year 1. The Applicant's assertion of "no undue adverse effects" therefore appears inconsistent with the significance levels reported in the ES.	adverse effects' was used to describe the LVIA identified level of residual effect as not being significant.
NNC 8.38 – 8.39	Landscape Character Effects	The Council's position remains that landscape character change is not dependent on visibility. Whether the arrays can be seen from a given viewpoint is not the determinant of landscape character effects. Character change arises from the alteration of land use, the introduction of energy infrastructure and the changes to landscape fabric. These factors are relevant irrespective of visibility.	The Applicant notes this comment.
NNC 8.38 – 8.39	Landscape Character Effects	For these reasons, the Council continues to consider that effects on landscape character within the 1 km study area remain Moderate-Major Adverse at Year 1. The Applicant's response does not provide new evidence that would alter this judgement.	The Applicant notes this comment.
NNC 8.43	Hedgerow Height and Enclosure	The Applicant confirms that changes to hedgerow height have been considered in the LVIA judgements. The Council accepts this but continues to emphasise that hedgerows grown to around 4–4.5 metres introduce a degree of enclosure that is unfamiliar in some of the	The Applicant notes this comment and confirms that the changes to hedgerow height have been considered in the LVIA assessment on both landscape character and visual amenity.

LIR Ref.	Topic Area	Summary	Applicant's Response
		landscape character areas. Although screening can reduce visual prominence, the resulting sense of a more enclosed, and compartmentalised landscape represents a character effect in its own right. This occurs regardless of whether the solar arrays are visible and therefore must be given weight as part of the overall assessment.	
NNC 8.45 – 8.48	Cumulative Site Effects	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 following 6 reasons for its judgements.	The Applicant notes this comment and maintains the findings of the LVIA are sound and robust, however notes the Councils recognition of differences in professional opinion.
NNC 8.45 – 8.48	Cumulative Site Effects	1. Dispersed Nature of the Sites The Applicant states that dispersal prevents the Scheme from reading as a single cohesive development. The Council agrees this may be true visually, but cumulative landscape character effects are not contingent on visual connection. Across the Sywell Plateau, the sites occupy a substantial proportion of the same landscape character area. Their dispersed arrangement does not reduce influence; it merely extends the footprint of land-use change across a wider geographic area. The cumulative character influence therefore persists regardless of whether the sites are perceived together.	The LVIA has robustly considered the individual Sites cumulatively within the assessment of effects. The Applicant maintains its position that the large areas of land between each of the Sites help assist with assimilation of the arrays into the receiving landscape. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography allowing the arrays to be distributed 'in and amongst' the landscape features.
NNC 8.45 – 8.48	Cumulative Site Effects	2. Scheme Being 'Overlaid' and Reversible Although described as an "overlay," the Scheme	The Applicant recognises the change in land use required to accommodate a green field solar

LIR Ref.	Topic Area	Summary	Applicant's Response
		replaces agricultural land use with energy infrastructure for 60 years. Land use is a tangible component of landscape fabric and strongly shapes character. Even if removed after decommissioning, for the duration of the Scheme this area will not function, appear or be managed as farmland. Reversibility in the distant future does not diminish the long-term character effects experienced during operation.	development. However, maintains that solar projects, with the exception of the footprint of the buildings, are 'overlaid' on the landscape allowing the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area.
NNC 8.45 – 8.48	Cumulative Site Effects	3. Strong Framework of Vegetation can soften visual effects, but it does not negate landscape character change. Tall, reinforced hedgerows and new woodland blocks may increase enclosure and alter existing rural qualities, and the infrastructure remains present behind them regardless of visibility. The ability to screen elements does not remove the fact that multiple parcels across the same character area shift from agriculture to solar generation, resulting in a sustained change to character.	The LVIA acknowledges that there would be an immediate change to the character of the Sites themselves as a result of the land use change from the existing agricultural use to solar infrastructure and that appreciation of this change would extend into the immediate surroundings resulting in a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. Adverse effects remain through to the decommissioning phase, although reduced and no longer significant as a result of the establishment of the mitigation planting.
NNC 8.45 – 8.48	Cumulative Site Effects	4. Benefits of Mitigation Planting at Year 15 Mitigation planting will help reduce visual effects in the long term, but it does not reverse the underlying alteration in land use or the functional identity of the landscape. The Applicant acknowledges adverse character effects at Year 1, and these effects continue for several decades beyond that point. Screening improves appearance, but the character shift persists for as long as the infrastructure remains.	The LVIA acknowledges a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1 and that Adverse effects remain through to the decommissioning phase, although reduced and no longer Significant as a result of the establishment of the mitigation planting. NPS EN-1 recognises at paragraph 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may*

LIR Ref.	Topic Area	Summary	Applicant's Response
			also be beneficial landscape character impacts arising from mitigation."
NNC 8.45 – 8.48	Cumulative Site Effects	5. Biodiversity Net Gain (BNG) BNG provides ecological benefits but does not mitigate landscape character change arising from large-scale energy infrastructure. Ecological enhancement and landscape character are related but separate planning considerations. Biodiversity improvements do not diminish the scale of land-use change or the perceptual shift from open agricultural countryside to a managed energy landscape.	Whilst it is acknowledged that ecological enhancement and landscape character are related but separate planning considerations the two are intrinsically linked. The establishment of the substantial areas of new woodland, hedgerows and meadows as part of the proposals being implemented to help mitigate adverse landscape and visual effects would also enhance the natural environment by providing net gains for biodiversity, providing additional enhancement and connections to wider ecological networks as well as contributing to the enhancement of the quality of the landscape.
NNC 8.45 – 8.48	Cumulative Site Effects	6. Legacy Landscape The concept of a legacy landscape may provide long-term ecological or structural benefits, but these would only be realised following decommissioning. For the entirety of the operational period, the character of the affected areas remains defined by energy infrastructure rather than farmland. A 60- year lifespan delays any legacy value and prolongs the period during which adverse landscape character effects are present.	The Applicant notes this comment.
NNC 8.45 – 8.48	Cumulative Site Effects	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,	The Applicant notes this comment.

LIR Ref.	Topic Area	Summary	Applicant's Response
		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.	
NNC - X	Comments on 60-year operations period.	From a landscape perspective, the Council considers that a 40-year operational period would be materially preferable to the proposed 60-year duration. The Applicant acknowledges within the ES that significant adverse effects on landscape character will occur at Construction and persist at Year 1, and that these effects will only begin to moderate as mitigation establishes by approximately Year 15. The Applicant has also confirmed that adverse effects remain at Year 15, even if reduced in magnitude compared with the early operational phase.	The Applicant notes this comment. In relation to the length of time of the operational lifetime and technology advances, please refer to the Applicant's response to comment 'SBMP-005' in **The Applicant's Response to Relevant Representations [REP1-161].**
NNC - X	Comments on 60-year operations period.	On that basis, extending the scheme to 60 years prolongs the period during which the landscape is subject to adverse character effects. Under a 40-year scenario, such effects would remain present for approximately 25 years beyond Year 15. Under a 60-year scenario, the same adverse effects would persist for around 45 years beyond Year 15. The difference is therefore not	The Applicant notes this comment. Please also see responses to NNC 7.17 to 7.20 in the **Applicant's Responses to Local Impact Reports [REP2-049]** . As outlined in the Written Summary of the **Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 [REF1-162]** the following Development

LIR Ref.	Topic Area	Summary	Applicant's Response
		marginal: the more extended duration would maintain a materially altered character for almost twice as long during the period after mitigation has matured. The length of time for which the countryside carries an energy infrastructure character, rather than an agricultural or open rural one, is therefore significantly greater under a 60-year lifespan.	Consent Orders have been granted consent for solar projects for a 60 year period into the Examination (Gate Burton, West Burton, Cottam, Mallard Pass, Tillbridge).
NNC - X	Comments on 60-year operations period.	In addition, the Applicant places considerable emphasis on the concept of a "legacy landscape", suggesting that the scheme will leave the landscape in an improved condition after decommissioning. If this legacy is to be realised, then an earlier end to the operational phase provides a clear benefit. A 40-year period would allow restoration, re-establishment of agricultural land use where appropriate, and the assimilation of any retained ecological or structural planting into a future landscape context at an earlier point. This would bring forward the timetable within which the stated benefits of long-term habitat creation, enhanced structure and improved landscape resilience can be experienced without the continued presence of energy infrastructure.	The Applicant notes this comment.
NNC - X	Comments on 60-year operations period.	A 40-year period would also align more closely with common assumptions in past solar schemes, where a 30–40 year operational lifespan has been regarded as the standard temporary period for large solar developments. It would therefore better reflect established	The Applicant notes this comment. As outlined in the Written Summary of the **Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 [REF1-162]** the following Development Consent Orders have been granted consent for solar

LIR Ref.	Topic Area	Summary	Applicant's Response
		expectations for the reversibility of such infrastructure and support clearer planning certainty regarding when the underlying land use might return to a more traditional rural character.	projects for a 60 year period into the Examination (Gate Burton, West Burton, Cottam, Mallard Pass, Tillbridge).