GREEN HILL
SOLAR FARM

Green Hill Solar Farm
EN010170

Applicant's Response to Deadline 3 Submissions

Prepared by: Lanpro Services

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The Infrastructure Planning (Examination Procedure) Rules 2010

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Contents

Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 4

The Applicant's Responses to Deadline 3 Submissions

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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 Written Representations (WRs) submitted by Interested Parties 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 The Applicant's Response to representations made by Stop Green Hill Solar have been responded to separately in **GH8.1.29 Applicant Response to Stop Green Hill Solar [EX4/GH8.1.29]**.

1.1.3 A total of 22 WRs and other documents were submitted to the Examining Authority by Interested Parties in response to the Scheme. WRs were published on 18 December 2025 to the Planning Inspectorate's website (PINS reference: EN010170).

1.2 Structure of the Report

1.2.1 This document provides a response from the Applicant to the matters raised in those WRs and other documents received.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Green Hill Solar Farm Examination Library.

1.2.3 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 3 to the Planning Inspectorate.

Table 1.1: List of Acronyms for Submission Documents

Acronym	Document Name
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
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
ODS	Outline Decommissioning Statement
OLEMP	Outline Landscape and Ecological Management Plan
OEPMS	Outline Ecological Protection and Mitigation Strategy
OSMP	Outline Soil Management Plan

Acronym	Document Name
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 Applicant's Response to Representations made by Deadline 3

2.1 Bozeat Parish Council

Table 2.1: [REP3-090]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BPC-001	Transport and Access	Response to WR **[REP2-048]** BPC-002	This response contradicts the Applicant's response at ISH1 where it was clearly acknowledged by the Applicant that the track from Access F-3 connects to Access F-2 and that this could be used instead. It was implied that this would be more inconvenient rather than impossible. Route 81 is of High sensitivity and of great concern to residents of Bozeat. Can the Applicant demonstrate why Route 81 is essential and why Access F-2 cannot be reached from Access F-3? If not, we maintain our view that Route 81 should be deleted from the scheme.	Route or Link 81 facilitates movements to access points CR23 and F2 which are necessary to provide access to the Cable Route Corridor between fields that comprise Green Hill F and to provide access to the section of Green Hill F south of Easton Lane. A substation is located in this area of Green Hill F which requires specific access to this area of Green Hill F and will therefore be needed during the operation and maintenance phase in addition to the construction phase.
BPC-002	Landscape and Visual Impact	Response to WR **[REP2-048]** BPC-003	It is hard to take seriously the level of impact suggested by the Applicant especially within an undulating landscape where even fully mature and successful screening would not completely screen the development. The extensive distribution of the scheme across the landscape means that those living and travelling through the landscape would spend much of their	The LVIA **[APP-045]** 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

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			time within the immediate setting of the scheme. Even with fully mature screening residents would inevitably experience views of the scheme infrastructure as they move through the landscape and be aware that they were living within a landscape dominated by solar infrastructure. We suggest that during development and until the screening is fully mature the impact would be Major adverse decreasing to Major-medium adverse. Those using PROWs that pass by or through the scheme would find it overbearing when not screened and lament the loss of open countryside views when screened. They would also lament the loss of tranquillity resulting not only from the change in the visual experience, but also from the noise created by the electrical infrastructure which would dominate or drown out birdsong. The recreational value of the affected PROWs would be substantially diminished meaning that they would be largely avoided.	remain through to the decommissioning phase, although reduced and no longer Significant as a result of the establishment of the mitigation planting. The LVIA acknowledges the Scheme would result in Significant Adverse visual effects, predominantly to users of those PRoW either within or immediately alongside the Sites. However, landscape mitigation has been embedded into the design of the Scheme to help mitigate these effects. The landscape mitigation does not attempt to provide zero visibility of the proposals., in attempting a Zero Visibility approach, this would likely have a greater impact as it would be out of keeping with the existing landscape, and would affect the legacy landscape after the Scheme is removed. Mitigation measures proposed have been identified to minimise adverse visual effects complying with NPS EN-3 by *"minimising the landscape and visual impact"* of the Development. NPS EN-1 recognises at para 5.10.13 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."*
BPC-003	Landscape and Visual Impact	Response to WR	The screening would have very little effect until it masks the majority of the infrastructure.	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

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
		[REP2-048] BPC-004	Does the DCO contain provisions to guarantee that the monitoring and management of the mitigation for the lifetime of the scheme? It is important that the DCO includes ongoing funding for the affected local authorities to monitor the scheme and for an environmental team to manage it.	detailed Landscape and Ecological Management Plan would be produced following consent of the Scheme and would be secured through Requirement 7 of the DCO.
BPC-004	Socio-economics, Tourism and Recreation	Response to WR **[REP2-048]** BPC-005	Again, it is hard to take seriously the assessment of impact suggested by the Applicant. Recreational users of PROWs and country roads are predominantly using them to enjoy the open countryside and escape the urban environment and industrialisation. During the operational phase the change in the nature of the experience would be substantial and drive most users to other routes. During construction, replacement and decommissioning there will be additional disruption and interruption of routes.	The Applicant refers back to the comments made at **Applicant's Response to Written Representations [REP2-048]** at 'BPC-005'.
BPC-005	BESS Air Quality	Response to WR **[REP2-048]** BPC-006	This response is very concerning in that it does not answer the concerns about rainfall during a fire event bringing toxic chemicals to earth. It also suggests that provision for firefighting is only for a maximum of 8 hour event despite the fact that the Liverpool battery fire lasted for 72 hours.	The Plume Study models all emissions and impacts from a BESS fire that are specified through NFCC guidance and from the Applicant's previous DCO consultations with the UK Health and Security Agency (UKHSA). The modelling considers a worst-case scenario which is a short-term emission release in worst

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			This raises the question of whether the fire assessment is adequate both in omitting consideration of possible pollution from toxic rain and whether the provisions for containment of water onsite are adequate for the duration of the fire. During ISH1 the Applicant did not answer the question of how long the on-site water retention could retain cooling water during a fire event and this should be clarified.	case weather conditions recorded over a five-year period. The Liverpool BESS fire referenced was a 59-hour event which was a very prolonged event because water was discharged directly on battery systems. If boundary cooling tactics (cooling of adjacent equipment) had been adopted for the fire, then the BESS would have burnt out in a much shorter time frame. The Liverpool BESS fire is not a relevant example to use for a plume study, because firefighting guidance and training strongly discourage discharging firefighting water supplies internally within BESS enclosures By definition, if a single BESS unit burns for a longer time frame (more than 12 hours), then fire temperatures and emissions are lower than recorded in a shorter time frame fire event where emissions are significantly more concentrated. The Applicant's Plume study has already demonstrated that there will be no significant off-site BESS fire impacts on sensitive receptors. The rapid dispersion of toxic gases in outdoor BESS fires limits the potential for off-site toxic exposure. Air sampling from previous BESS fire incidents has found that off-site contaminant concentrations did not pose a public health risk.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Recent Large Scale Fire Test (LSFT) BESS research and real-world incident experience indicates that emissions in the smoke from a BESS fire in an outdoor setting are comparable to those of a residential / commercial structure fire. Because a BESS fire would involve a modular non-combustible enclosure tested to prevent propagation, any emissions or other substances generated by a fire will be less than those produced by a fire involving most commercial or industrial building structures. In relation to the point raised at ISH1, the on-site water retention for a BESS fire is not defined by a fixed time period. Retention is capacity based rather than time based, as set out in the **Outline Battery Storage Safety Management Plan (Revision A, Clean) [REP1-143]**. The duration for which cooling water and rainfall captured during the period of the incident can be retained depends on the available containment volume and the rate of inflow during the incident. Where an incident is prolonged, or where rainfall occurs during the event, containment capacity is maintained through active incident management. This includes early sampling and testing of retained water, followed by controlled discharge where water quality is acceptable and, where contamination is identified, removal by tanker

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				for off site treatment in accordance with the Emergency Response Plan.
BPC-006	Ecology and Biodiversity	Response to WR **[REP2-048]** BPC-007	We note that an impact is acknowledged. A concern raised by this response is that some deer, particularly immature deer, may be able to enter sites and become unable to find their way out.	As outlined in FC-008 in **The Applicant's Response to Relevant Representations [REP1-161]**, the perimeter fencing is considered to be permeable for the species of deer identified as present or potentially present in the local landscape, and habitats within and outside of the security fencing will be highly suitable for deer post-construction. Table 1 of the **Outline Ecological Protection and Mitigation Strategy (Revision A) [REP1-139]** also contains the details of a local wildlife rescue centre, which can be contacted by construction/maintenance staff or the Ecological Clerk of Works should a situation arise where the welfare of an animal is at risk.
BPC-007	Transport and Access	Response to WR **[REP2-048]** BPC-008	It is concerning that the implication in this section is that the Applicant or their successor is likely to dispute responsibility for road defects.	The **Outline Construction Traffic Management Plan Revision B [REP3-064]** provides a clear commitment to agree road condition surveys with the highway authorities and to ensure that any damage caused by the Scheme to the highway is repaired.
BPC-008	Transport and Access	Response to WR **[REP2-048]** BPC-009	Why can the operational hours of traffic management on the A509 not simply be included in the DCO rather than relying on it being noticed by the Highways among many other TTRO requests?	The need to ensure the operational hours are suitable for specific areas of the Scheme and are suitable at the time of construction means that the Construction Traffic Management Plan is the appropriate mechanism for agreeing operational hours with the highway authorities.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BPC-009	Consultation	Response to WR **[REP2-048]** BPC-010	We remain of the opinion that while the elements of consultation took place, it did not feel as though they influenced the scheme.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. The Applicant notes **Adequacy of Consultation Responses [AoC-001 to AoC-015]** where local authority consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out. The Applicant refers to **Chapter 5: Alternatives and Design Evolution [APP-042],** Table 5.9 where the Applicant has set out design changes in response to comments received during the statutory consultation.
BPC-010	General Matters Energy Need	Response to WR **[REP2-048]** BPC-011	In other words, the Applicant suggests that the adverse impacts should be overridden because they have put together a scheme. The need has not been challenged however; the sun is not constrained to this part of Northamptonshire.	The **Planning Statement [REP2-043]** sets out the planning balance in Section 7.2. The need for such development is such that the UK Government has concluded that there is a critical national priority for the provision of nationally significant low carbon infrastructure (para. 4.2.4 of EN-1). Para. 4.2.5 confirms that solar development falls within the category of critical national priority by stating that low carbon infrastructure for the purposes of that

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				policy means all onshore and offshore electricity generation that does not involve fossil fuel combustion. The environmental statement provides a robust assessment of the potential impacts of the Scheme and finds that there are limited significant adverse residual effects remaining after mitigation of which have been considered within the planning balance, concluding that the Planning Statement set out how the Scheme complies with Planning Act 2008, NPS EN-1, NPS EN-3 and NPS EN-5, including the draft versions, the NPPF and development plans. The **Planning Statement [REP2-043]** recognises that whilst it has not been possible to avoid all impacts, these have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies secured through this DCO Application. The national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. In addition, critical national priority policy requires that residual impacts are outweighed by the urgent need. Therefore, it is considered that development consent for the Scheme should be granted. The location of the Scheme is governed by the location of the point of the connection. The first stage of the site selection process is securing a grid connection, as this is critical to determine

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				the Scheme's feasibility. Without a defined and agreed grid connection, the Scheme would be unfeasible.

2.2 Anne Julia Barber

Table 2.2: [REP3-104]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
AJB-001	Hydrology, Flood Risk and Drainage	Flood risk in Lavendon	I am very concerned at the lack of information and surveys from qualified hydrologists regarding the vastly increased flooding risk which will inevitably affect Lavendon. "Mapping identifies potential development zones overlapping with flood risk areas etc……". Hardly a detailed survey. Lack of concern is extremely worrying	The Applicant notes the concern regarding flood risk management for Lavendon. Flood risk at Site G has been assessed in detail in **ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [REP1-053]** and the supporting **ES Appendix 10.10 Annex I: Green Hill G [APP-107]**. These confirm that the development footprint lies within Flood Zone 1, with only minor areas of surface water risk, and that runoff from the site will be restricted to greenfield rates with attenuation and exceedance routing provided within the Order Limits. The assessments demonstrate that the Scheme will not increase flood risk to Lavendon or elsewhere. Extensive work has been undertaken at Site G to confirm that there will be no off-site detriment, including review of catchment hydrology, Environment Agency datasets, topographic analysis, and sustainable drainage design in line with **CIRIA C753: The SuDS Manual**. As evidenced by Cook & McEwan (2013) and the BRE National Solar Centre (2014) Good Practice Guidance

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				for Solar Farms, solar panel arrays do not materially increase runoff, as rainfall continues to infiltrate between and beneath rows with drip lines dispersed over vegetated ground. The principal hydrological risk arises from soil compaction during construction, which is mitigated through the **Outline Construction Environmental Management Plan [EX1/GH7.1_A]** and the **Outline Soil Management Plan [APP-550]**. Flood risk management for Site G is therefore secured through embedded design and through Requirement 11 (surface and foul water drainage) in Schedule 2 to the **Draft DCO Revision A [EX1/GH3.1_A]**, ensuring the Scheme will not add to the existing flood issues in Lavendon.

2.3 Ben Elderton and Trescella Claudette Elderton

Table 2.3: [REP3-105] and [REP3-126]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
ELD-001	General Matters	Background	We are instructed on behalf of Trescella and Ben Elderton, trading as FC & CC Elderton of Glebe Farm, Great Doddington, Earls Barton, Northamptonshire, to respond to the Examining Authority's Second Written Questions (ExQ2) and to comment on the Applicant's responses to our Written Representations (REP2-048) submitted at Deadline 2. These responses are made Without Prejudice to making further representations for different reasons or in order to amplify these representations.	The Applicant notes this comment.
ELD-002	Alternatives and Design Evolution	Responses to ExQ2 **[REP2-048]** ELD-004	The Applicant's response (ELD-004) fails to adequately address the concerns raised in our Written Representations (in particular paragraphs 3.1 and 3.7), as it is non-committal and lacks sufficient detail to enable the likely impacts to be properly assessed. Whilst the size of the compound is a consideration, the primary issue is its proposed location within a larger parcel of land. If the compound is located as it is proposed at the furthest point from the public highway, with access provided via a track bisecting land to the west of the cable route, this would materially compromise the	The location of the construction compound is restricted due to the routing of the overhead lines. The Applicant will continue to engage with the landowner to identify opportunities to minimise impacts on the business. The landowner will be compensated for the use of their land as a construction compound.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			ability to carry out normal agricultural operations across at least half of the field. Locating the compound to the east of the cable route would allow the land to the west to remain in agricultural use and would significantly reduce operational disruption and consequential losses. If the presence of overhead lines prevents the relocation of the construction compound, we expect our clients to be adequately compensated for any disturbance or injurious affection caused to the retained land. In the absence of a defined and secured compound location, the Examining Authority cannot be satisfied that the proposed design has been minimised so far as reasonably practicable or that impacts on the farm business have been adequately mitigated.	
ELD-003	Alternatives and Design Evolution	Cable Routing **[REP2-048]** ELD-001, ELD-009	The Applicant's statement that "we have agreed that the cable will be positioned as far from their farm buildings as possible within the Order Limits" is expressly caveated by the qualification that this will be "subject to surveys post-consent and detailed design". This introduces an unacceptable degree of flexibility at a point when the Examining Authority is required to assess the likely significant effects of the development and the adequacy of mitigation. There is a clear risk that matters of convenience or cost will subsequently be	The **Draft DCO Revision C [REP3-024**] provides broad powers in order to provide the necessary flexibility to carry out the authorised development and respond to the development of the detailed design of the Scheme. These powers are then controlled by the Requirements and protective provisions. The cable must be located within the width of the area of Work No. 5, which is considered to provide a proportionate degree of certainty as to the location of the cable whilst retaining

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			relied upon as 'design constraints' to justify a cable alignment that is materially closer to the farm buildings than is necessary. Once the Development Consent Order is made, there will be very limited opportunity to influence or secure changes to the cable alignment. It is therefore essential that the alignment is resolved through the Examination and not deferred to post-consent stages. In this regard, we maintain that the 50-metre corridor has not been aligned as closely as reasonably practicable to the existing overhead lines, particularly in the vicinity of the farmyard. The Applicant appears to have prioritised a flatter and, by inference, more cost-efficient route over one which would minimise adverse effects on the agricultural holding. The absence of any "lift and shift" provision within the proposed easement design further exacerbates this issue, as it would permanently sterilise future farm operations and potential development opportunities. This is inconsistent with established decision-making principles, which require flexibility to be tightly controlled and justified where it may give rise to materially different or greater impacts. In the event that a "lift and shift" solution is not feasible, we expect that our clients will be adequately	sufficient flexibility to accommodate any design requirements identified through detailed post-consent surveys. With regard to 'lift and shift' provisions, we have agreed that the cable will be positioned as far from their farm buildings as possible within the Order Limits, but this will be subject to surveys post consent and detailed design. The Applicant refers to response 'ELD-005' in **[REP2-048].** The Applicant has recently met with the Landowner's agents to discuss this and will continue to engage on this matter.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			compensated for the detrimental effects caused. Accordingly, we reiterate our request that the cable route and associated construction compound be amended now, preferably to follow the easternmost boundaries adjacent to the A45. This would materially reduce harm to the farm business and the local environment and would provide the Examining Authority with the certainty necessary to conclude that the scheme has been designed to minimise land take and adverse effects so far as reasonably practicable.	
ELD-004	Alternatives and Design Evolution	Cable routing **[REP2-048]** ELD-004, ELD-007	Please refer to paragraph 2.1 and 2.2 above.	Please refer to the responses set out at 'ELD-002' above.
ELD-005	Transport and Access	Traffic Management Measures **[REP2-048]** ELD-008	It is our position that any traffic management measures required on Doddington Road in close proximity to the A45 junction are likely to give rise to significant congestion, with tailbacks potentially extending onto the A45 dual carriageway. Such congestion would materially impede access to our client's farm shop and is likely to deter or dissuade regular customers travelling from Wellingborough, Great Doddington, Wollaston, Wilby and, to a lesser extent, Northampton. In the absence of detailed and	The **Outline Construction Traffic Management Plan Revision B [REP3-064]** provides a commitment to agree appropriate traffic management with the highway authorities. Any traffic management will need to be appropriate to the location and ensure that aspects such as queuing, interfering with connecting roads does not occur. In the context of Doddington Road, this is proposed to provide access to the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			secured traffic management arrangements, the Examining Authority cannot be satisfied that the temporary impacts on the local highway network and on the viability of the farm shop have been adequately assessed or mitigated. We therefore request that the section of cable that crosses Doddington Road be installed by directional drilling rather than open trenching, in order to minimise disruption to Doddington Road and to avoid the removal of trees or extensive ground works that would otherwise be required.	Cable Route Corridor. As such, vehicle movements are low which would ensure any traffic management will be limited. Equally, vehicle movements will be controlled so that these occur outside of the busiest peak hour periods, further reducing the potential for unnecessary delay to road users.
ELD-006	Alternatives and Design Evolution	Requests for Protective Measures and Design Amendments	To minimise impacts on the agricultural holding and local highways, we request the following measures be secured through the DCO or associated requirements: Construction Compound – Relocate the compound to the easternmost boundaries adjacent to the A45 to allow continued farming on land west of the cable route. The location must be fixed and not subject to post-consent design flexibility. Cable Alignment – Align the cable as far from farm buildings as reasonably practicable. Include "lift and shift" provisions in the easement design to avoid sterilising future farm operations or development opportunities.	The Applicant refers to responses to 'ELD-007' and 'ELD-009' within **[REP2-048],** the location and size of the construction compound (CC2) will be determined prior to construction at detailed design stage and the precise alignment of the cable circuits within the 50 m Cable Route Corridor will be confirmed during the detailed design stage. The size of the construction compound is restricted to the area under Work no. Work No 5A(vi) outlined within the **Works plans [REP3-008]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Traffic Management and Doddington Road Crossing – Install the cable under Doddington Road by directional drilling rather than open trenching to minimise congestion, prevent tailbacks onto the A45, and avoid the removal of trees or extensive ground works that would otherwise be required. Any traffic management measures must be fully detailed, agreed in advance, and secured through the DCO. These measures are necessary to minimise land take, operational disruption, and environmental impacts, and to provide the Examining Authority with certainty to assess the proposal.	The **OCTMP [REP3-064]** outlines the traffic management measures to be secured within the DCO. The Applicant met with the land agent on the 8th January 2026 and will continue to engage with the landowners on these matters.

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2.4 Chris Robinson

Table 2.4: [REP3-106]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CR-001	General Matters	Introduction	Further to speaking at the Open Floor meeting on Friday 12th December 2025; I would like to make the following representations that I believe should be included in any S106 or DCO contract/legislation. My name is Chris Robinson, a local resident of Mears Ashby. I represent myself and I express my personal view and input into this project. Essentially, this application is the Wrong deal, with the Wrong company in the Wrong place. I would like to summarise the points I made at the Open Meeting as a written representation	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**
CR-002	General Matters	S106 Obligations	The DCO should include a S106 contract between North Northamptonshire Council and the underlying landowners to support and collateralise the contractual obligations, This is a normal part of the Town and Country Planning Act of 1971. This is particularly important as the Applicant is a shell company with capital of only £100 and £6 million approximately of short term liabilities due in less than a year. The company holds no long term assets.	Please refer to 'CR-003' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The Applicant is essentially making 60 year commitments based on an overdraft. The applicant is insufficiently capitalised for a project of this size and undertaking. Clearly they expect to sell this approval on to a third party as a speculative venture. The S106 would bind parties to ensure that commitments are met throughout the life of the project. It is critical that the participating land owners be held liable for this use of their land.	
CR-003	General Matters	Guarantees	I recommend that the applicant be required to provide a Performance Guarantee from a major UK Bank to cover the commitments made as part of the DCO. This should be in the region of £180 million to £200 million. The beneficiary should be North Northamptonshire Council. The guarantee should cover significant project milestones through the final termination in 60 years. This could be a straight forward financial guarantee under ISP98 (Standby Letter of Credit or Demand Guarantee). URDG 758 framework guarantees should be avoided as this is expressly linked to the underlying contract and it may be disputed. The Guarantee should cover the 60 year life span of the project and include decommissioning.	Please refer to 'CR-001' in the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** The **Funding Statement (Revision A) [APP-020]** demonstrates the Applicant's understanding of costs and ability to secure the funding necessary to deliver the Scheme as consented if the DCO is granted. The Applicant must provide a guarantee or other security, approved by the Secretary of State, under article 48 of the **draft DCO Revision C [REP3-024]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CR-004	Ecology and Biodiversity Planning Matters	Biodiversity and Area of Natural Beauty	The commitments offered under Biodiversity appear to be insufficient. The applicant is offering part of its own project to offset the loss of Biodiversity. This requirement should be formalised with Biodiversity Units created to achieve the required BNG (Biodiversity Net Gain) for a minimum of 30 years. These Units would need to be registered and agreed with a formal institution such as the UK Environment Bank. The value of these units would be specifically agreed with the Government agency as if normal practice. The BNG Units for waterways that are affected have a higher costs than agricultural Units. The current market value for agricultural BNG Units is above £20,000 per acre and over £120,000 per acre for waterways impact. The Applicant's current plan allocates over 1000 acres to BNG which should be formalised as true BNG before any project commences. The applicant should be requires to carry out a wider study of adjacent farm and waterways, specifically in the Nene valley that will require additional BNG units to be purchased. Additionally this project is located within 7 miles of a designated Area of Natural Beauty (AONB), namely Sywell reservoir and lakes. The applicant should be	Please refer to 'CR-005' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** The statements regarding how Biodiversity Net Gain should be applied to this Scheme are not correct. Providing an on-site biodiversity net gain has been factored into the design of the Scheme from an early stage, such that at least 10% net gain in all three unit types can be delivered within the Sites themselves. As such, no off-site measures are required to ensure that the Scheme is compliant with the requirements of Biodiversity Net Gain. The delivery of a net gain for biodiversity is secured through Requirement 9 of the **Draft Development Consent Order (Revision C) [REP3-024]**, which secures the provision of biodiversity net gain strategies which detail how the outcomes of the BNG assessment will be delivered. The Applicant would reiterate that, as outlined in the response to CR-005 in **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP3-129]**, Sywell Reservoir and Country Park is not designated as an AONB, but as a Local

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			required to make adequate compensation and additional Biodiversity offset beyond the boundaries of the projects. A solution would be not to grant planning permission for any panels to be located within 7 miles of Sywell AONB. This would eliminate sites C and D from the proposal. The land at these sites could be used as part of their BNG commitments instead.	Wildlife Site. An assessment of potential impacts on this Local Wildlife Site is provided in **paragraphs 9.9.52 - 9.9.64** of the **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]**.
CR-005	Transport and Access	Upgrading Road Infrastructure	The S106/DCO should include a contractual commitment to improve the road to support two passing HGV's without damagaing the roadside and verges. Th cost to North Northamptonshire Council of upgrading to a standard two lane road is approximately £8million per mile (Source: Department of Transport). These roads are currently suffering from significant potholes on the edges of the roads. I estimate that at least 13 miles of country lanes would need to be upgraded, specifically the Wilby Road between Mears Ashby and Wilby, the Kettering road to Moonshine Gap, the Earls Barton road, extending north from Mears Ashby. This totals at £104 million. Additionally there as local bridges that need to be addressed. The upgrade to local roads should be completed before any development commences.	Please refer to 'CR-006' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CR-006	Hydrology, Flood Risk and Drainage	Flood Insurance	The project has a significant flood risk, in areas of the Nene Valley that have flooded recently cf. 2024, 2023. The Applicant should commit to provide sufficient insurance cover for the local community and surrounding areas.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** The Applicant notes the request that the Applicant "commit to provide sufficient insurance cover for the local community and surrounding areas". Flood insurance is not a planning control matter and cannot reasonably be secured or enforced through the DCO. Insurance availability and pricing are determined by individual insurers' underwriting decisions for specific properties and risks. There is no policy basis within the Planning Act 2008 regime to require a scheme promoter to underwrite third-party flood insurance, and such an obligation would not be proportionate or enforceable. In any event, the Scheme's flood risk evidence demonstrates that the Scheme is safe for its lifetime and will not increase flood risk elsewhere. This is established through the Scheme-wide assessment 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]**, supported by embedded mitigation and construction controls, including those addressing the principal

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				construction-phase risk mechanism for solar developments (temporary soil compaction), as set out in the **Outline Construction Environmental Management Plan (Revision A) [REP1-146]** and **Outline Soil Management Plan [APP-550]**.
CR-007	General Matters	Fire Service	The Applicant should commit to provide funding for upgrading the capabilities of the local Fire Service.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** The Applicant has been actively engaging with the fire and rescue service and has an agreed Statement of Common Ground with the Northamptonshire Fire and Rescue Service. The Applicant has previously offered training on BESS. No request for additional funding has been made by the fire and rescue service.
CR-008	Community Benefits	Community Offset	The Applicant should agree to providing the local community with free or low cost electricity to offset the impact on local community and promote local investment in business. I would suggest a total or 50GW hours per annum (approximately 9% of the output). The Applicant should commit to meeting all future legislation for energy projects to support the impacted local communities.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CR-009	Alternatives and Design Evolution	Alternative Sites	The Inspectorate should require the applicant to further evaluate alternative sites such as Corby.	Please refer to 'VS-008' the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**
CR-010	General Matters	Introduction	As a local resident of Mears Ashby I support the other objections that have been raised. In short, this application is the wrong deal, with the wrong company in the wrong place. The applicant should be required to address all of the above points and they should be incorporated in a S106 and within the DCO. These commitments must be attached to the land owners and the Applicant. It appears to be extraordinary that that a project of this scale can be placed around the historic village of Mears Ashby, utilising over 50% of the acreage of the whole parish.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

2.5 Dale Brown

Table 2.5: [REP3-107]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DB-001	General Matters	Responses to ExQs	Having read the Green Hill responses to the EXa1 and the Planning Inspectorates EXa2 questions I dont believe that either documents have address the questions fully or answered the points raised sufficiently. In particular my family have raised various points across a range of submissions. Please can these be answered in more detail.	The Applicant notes this comment. Please refer to the **Applicant's Responses to Written Representations at Deadline One [REP2-048].** The submission REP1-249 from Dale Brown has been addressed within this response document. However, considering the volume of representations received, the responses have been organised by theme.

2.6 James Garton

Table 2.6: [REP3-108]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
JG-001	Compulsory Acquisition	Objection to Change Request no. 6	Objection to compulsory land aquisition (Change 6) to the south of Wilby Road , Mears Ashby. I Object vigorously to the proposed aquistion for purchase of the strip of land / track here to assumedly allow access for the construction and maintenance of the Green Hill Solar Farm. I live on Wilby Road in the at Village Farm and this track is adjacent to my property and small dwellings I live on Wilby Road in the at Village Farm and this track is adjacent to my property and small dwellings. This small track is not suitabe at all for construction traffic and more importantly I strongly object for the potential use of this for heavy good vehicles and or similar using this track and the signficant disruption this will have to my familiar and their safety as well as my immediate neighbours.	The Applicant seeks to clarify to Mr. Garton that the inclusion of Change No.6 is **solely** for the purpose of ensuring users of the permissive paths on Green Hill E have direct connection to the PROW network (in this case byway open to all traffic TN|010). This is shown by way of the land at Change No. 6 **solely** being proposed for Work No. 6 and 10B on **Works Plan Revision D [REP3-008]**. No construction or maintenance traffic is proposed in this location.
JG-002	Transport and Access	Construction Impacts	This village is a small community and the impact of a huge construction project and the associated traffic to the area is simply to high impact to its residents.	The Applicant is cognisant that due to the Scheme's location, the community in Mears Ashby is likely to be directly affected by the construction of the Sites at Green Hill D and E. These effects have been assessed in **ES Chapters 13: Transport and Access Revision A [REP2-003]**, **17: Socio-**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Economics, Tourism and Recreation [APP-054], and **18: Human Health [APP-055]**. None of these assessments find residual significant adverse effects to Mears Ashby subject to implementation of mitigation measures. As such, the Applicant is committed to the mitigation measures set out in the relevant management plans secured through the **Draft DCO Revision C [REP3-024]**.
JG-003	General Matters	Use of Track (BOAT TN|010)	The noise distrubance, volume of traffic, danger walking out of my rear access, parking will simply be a unmitigated disaster which the local infrastructure cannot support.	The Applicant seeks to reiterate for clarity that no construction or maintenance traffic is proposed in this location. Therefore, Change No.6 results in no additional impacts to residents or visitors in this location.

2.7 Kate Gregory

Table 2.7: [REP3-109]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KG-001	Glint and Glare Socio-economics, Tourism and Recreation	Response to D1 Submission **[REP2-050]** KGRG-009	Page 129 of the report in section KGRG – 009 refers to Glint and Glare on the Three Shires Way. Greenhill Solar have reproduced a section of my report in a misleading way. My comments appear to confirm that the number of users on the Three Shires Way is low. In fact I went on to demonstrate that the number of users is high as confirmed by a petition placed on the entrance to the Three Shires Way gathering almost 200 signatures in just a couple of weeks. Greenhill Solar then repeat that their source for Glint and Glare effects in horses are from the British Horse Society. I had already suggested that this data was flawed in my report. Greenhill Solar have not responded to this comment, nor have they carried out their own research on the effect of solar farms on horses and are therefore reliant on this flawed data.	As summarised in **ES Chapter 15 Glint and Glare [APP-052]**, Pubic Rights of Way were considered within the Glint and Glare Assessment. This included all users, including equestrians. As highlighted within the chapter, density of users along Public Rights of Way is just one factor considered when classifying the sensitivity of the receptors. The Applicant further considers potential impacts of glint and glare towards the Three Shires Way within the **Glint and Glare Technical Note [REP2-0524]**. The note concludes that a low impact may be classified towards users of the Three Shires Way and that detailed modelling is not required. The Applicant has used the written guidance from the British Horse Society to interpret likely effects on equestrian PROW users and apply specific mitigation where considered necessary. For Glint and Glare, BHS advice does not raise any need for specific mitigation based on the likely glint and glare effects assessed. As a result, this has only been given consideration in respect to amenity and enjoyment of use for

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				PROW users in the assessment of impacts on routes such as the Three Shires Way. This is assessed in **ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [REP1-079]**.
KG-002	Noise and Vibration Socio-economics, Tourism and Recreation	Response to D1 Submission **[REP2-050]** KGRG-010	The next section deals with noise and vibration, reference KGRG – 010. The applicant agrees that the noise during construction from pile driving is unpleasant and potentially distressing. They then go on to say that it's temporariness means it is not usually a material planning consideration. I would argue that two years of construction is not temporary. The effect on my business will be considerable in that period of time. The people that stable their horses with us will not tolerate two years of unpleasant noise and distress. They will move their horses to another livery stables. The applicant states that the key objective is to ensure that the Three Shires Way remains open and safe at all times through the schemes construction. This is impossible. They cannot guarantee the safety of horse riders through the construction phase and to state that they will do so, shows a clear lack of knowledge and understanding of how horses react to even small changes in their usual, familiar environment.	The comment references where the Applicant has directly quoted the British Horse Society's guidance note "Advice on Solar farms near routes used by equestrians". The Applicant has sought to apply mitigation measures on all PROWs used by equestrians to reduce the level of effect on users as much as possible. The Applicant has furthermore sought to assess the likely level of impact on neighbouring equestrian facilities to ensure that appropriate mitigation measures can be put in place to minimise significant effects to receptors. The Applicant has assessed this and set out its conclusions for each receptor included in **ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [REP1-079]**. For construction effects, the assessment finds a residual **significant adverse effect** to the Three Shires Way as a result of its regional importance, and a medium-term temporary moderate minor

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Without wishing to repeat what I have already written in my report, my clients had considerable problems riding past the machinery used during the excavation phase last winter so it is unlikely that they will be untroubled by the construction phase.	adverse effect (not considered significant) to the facilities at Lower Farm where construction effects from Fields GF13 are anticipated.
KG-003	Landscape and Visual Impact Socio-economics, Tourism and Recreation	Response to D1 Submission **[REP2-050]** KGRG-011	Lastly under the Landscape and Visual Impact section referenced to KGRG – 011 the developer goes on to admit the enormity of the change in this landscape. Firstly, they say that the scheme has been designed to be sympathetic to local character in setting, helping to protect and enhance the landscape through landscape lead design. This statement is extraordinary. How a solar farm of this scale can be sympathetic to the local environment and enhance the landscape is nonsensical. The developer then goes on to admit that they intend to create a "green corridor" for users of the path. They will plant hedgerows providing enclosure and separation from the panels, enclosing the view along the route resulting in a loss of the wider open views of surrounding countryside. They clearly intend to completely screen off the development, which of course in itself completely blocks all views over the open countryside. I disagree with the developer that creating a hedgerow that blocks the view of solar panels which themselves block the view of the open	The Applicant notes these comments and remains confident in their responses given at KGRG-011 **[REP2-050]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			countryside are an attractive alternative to what we have currently. Bridleways that are enclosed by hedgerows on either side tend to get very muddy in the winter months which can be demonstrated by other bridleways in the area with a similar landscape. This factor along with the non-existent view over the open countryside does not make it an attractive or enjoyable alternative as the developer suggests.	

2.8 Katharine Mary Payne

Table 2.8: [REP3-110]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KMP-001	Transport and Access	Traffic Impacts	I would like to reiterate my concerns, should this application be permitted, regarding traffic, disruption to our normal life in the village and to our village school. The proposals regarding access to the sites around Mears Ashby will mean that on Monday to Saturday it will be virtually impossible for vehicular traffic to leave the village, especially at peak times, due to the proposed traffic lights at Beckworths on Glebe Road, the five proposed crossings on Highfield Road, the ones on Wilby Road and one on Earls Barton Road and the sheer number of construction vehicles, both lorries and personal transport involved - I don't believe that the traffic counts submitted reflect the true number of vehicles currently using our roads at peak times. Our village school relies heavily on pupils from outside the village who are brought to school by car.	The Applicant refers to the comments made at **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP3-128]** at 'LC-007'.
KMP-002	General Matters	Disruption to School Operations	Also, the constant noise and possible air pollution from ongoing construction work will cause even more disruption to learning already suffered by the children during the Covid lockdowns. If parents cannot easily get their children to school, they may well choose to remove them which would in all probability	Please refer to 'LC-007' within the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicants Response **[REP3-128].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			mean the closure of the school due to the fall in numbers.	
KMP-003	Agriculture and Soils Energy Need	Use of Agricultural Land	I am deeply distressed about the loss of high-grade food producing farmland. We should be promoting food production not reducing our capacity to do so by installing huge solar panels	The comment is noted. Land quality and land use considerations are set out in the **ES Chapter 20 [APP-057]** and the **Farming Report [APP-571]**. It is noted that in the Popular Misconceptions section of the Solar Roadmap (DESNZ, June 2025) that "the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly". The land will not be lost, and it can still be in agricultural use for sheep grazing during operation. The land will be returned back to agricultural use after decommissioning at the end of the Scheme's lifespan. Soils and land quality would be improved after decommissioning, and this would boost food production strategically.

2.9 Katharine Wilson

Table 2.9: [REP3-111]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KW-001	General Matters	Cable Routing	This is the statement read on my behalf at the planning inspecorate meeting at Northampton on 12th December 2025. She said you had asked for a copy of my statement because you were unaware of the ponds at the cable route near Hannington. I am not forwarding the map the landowners provided me with as I do not feel it is my place to do so . I have contacted them and given the email and suggested they should provide you with the map. They have a land agent working on their behalf on the matter of the cable route on their land, and told me they would not allow Greenhill Solar to put the cable across the conservation area.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** No map has been provided to the project team by the interested party, if provided, Green Hill Solar will look to respond to the point in full. However, as outlined in response to KW-006 below, the Applicant has identified the area thought to be of discussion with a commitment to HDD the ponds avoiding potential impacts to during the construction of the cable route. The Applicant will continue to engage with the landowners in regard to the ponds.
KW-002	General Matters	Introduction	My objection to the Green Hill Solar development has two themes. 1. My deep love of the rural landscape and natural environment of Northamptonshire 2. I feel that many of the statements written by Green Hill Solar are presented as facts but are entirely	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			subjective, biased towards the development and cannot be proven	
KW-003	Human Health	Personal Connection to Location	I have lived in this area for 75 years, 53 of those in the Parishes of Walgrave and Hannington, and have a deep love of our landscape and farming year. Living here and walking the lanes and rights of way is the essence of my life, my physical and mental health and well being.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**
KW-004	Landscape and Visual Impact Socio-economics, Tourism and Recreation	Changes to views from PROWs and recreation routes	Area A1 will completely change the Newland Road and Green Lane. The road is a designated Quiet Lane and as such is safer for walkers. Walking here the fields on either side are a rich source of views and space with ever changing and uplifting seasons, colours, textures sounds and scents of the countryside and farming year. These fields to both sides will become an industrial area of over bearing glass obliterating everything I love about the countryside, totally changing the experience of walking. Green Hill Solar states (page 26 column 3) "By year fifteen of the operational stage the visual impact will reduce to not significant". This cannot be true. For well over a decade and the glass panels will completely dominate any views over	The LVIA **[APP-045]** acknowledges that there would be 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. The LVIA acknowledges the Development would result in Significant

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the rural landscape. When the planting scheme has matured the Road and Green Lane will be trapped in a tunnel between tall vegetation with no landscape views, wide skies or sense of space. So how can Green Hill Solar state there will be "beneficial effects on the landscape fabric when planting is established" There will actually be no landscape to view. This reasoning also applies to stretches of Bridleway CT3 in Hannington Parish. The large area of glass at A1 north of Walgrave will be a clearly visible blight on the view of the landscape north of the bridleway, and further along the area A2 panels will again dominate the walk towards the A43.	Adverse visual effects, predominantly to users of those PRoW either within or immediately alongside the Sites. However, landscape mitigation has been embedded into the design of the Scheme to help mitigate these effects. The landscape mitigation does not attempt to provide zero visibility of the proposals. Mitigation measures proposed have been identified to minimise adverse visual effects complying with NPS EN-3 by *"minimising the landscape and visual impact"* of the Development. NPS EN-1 recognises at para 5.10.13 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."* The Applicant refers to the comments made at **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP3-129]** at 'LT-009'. With specific regard to effects on bridleway WN|CT|3, these have been assessed in **ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [REP1-079]**. The assessment finds no greater than a medium-term temporary moderate-

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				minor adverse effect during construction (as a result of the visual impacts from Green Hill A.2 and cable route works affecting the PROW), reducing to a long-term minor adverse effect during operation as a result of landscape planting maturing during the operational lifetime of the Scheme. Views of Green Hill A have not been given any specific consideration due to views from WN|CT|3 towards Green Hill A occurring only at field gateways, and at a distance of around 1.5 km.
KW-005	Landscape and Visual Impact	Changes to views from PROWs and recreation routes	Green Hill Solar's response to my landscape narrative freely acknowledged that there will be "an immediate change in the character of the sites" and then state the development is not permanent. Sixty years cannot be considered temporary. They state the "will be a benefit to the character of the landscape" which will be "left in a better condition" and been "improved through mitigation". These statements are entirely subjective depending on one's personal perspective and cannot be proven. No person or organisation can predict the actual effect of this	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129],** specifically LT-008 in regard to the temporary nature of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			development over the course of the next sixty years or more.	
KW-006	Ecology and Biodiversity	Assessment surveys and outcomes	The company states the solar area will benefit animals such as polecats (page 25 column 3 Ecology) These animals inhabit woodlands, lowland marshes and river banks, not farm land covered in solar panels. The cabling route running south east of Hannington towards the A43 cuts straight through the conservation area of ponds created for Great Created Newts by the Fresh Water Habitat Trust. This exposes Green Hill's inability to fully assess the impacts of the 3000 acre solar development. Again and again in all the information and reports the word "mitigation" is used to by pass the real and lasting effects of this vast industrial site on our much valued and sadly fast disappearing country side.	Polecat were scoped into the ecological assessment given that previous records of this species were returned from within the Study Area during the desk study, and that the Sites support habitats which polecat are typically associated with, including farmland, woodland and riparian habitats. Arable land is a key habitat for polecat: see the Mammal Society's website, which states "*In England, farmland with hedgerows and small woods is preferred*." The Applicant refers to **paragraphs 9.9.206 - 9.9.214** of the **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision A) [REP1-033]** for details of the assessment relating to 'Other Mammals - Harvest Mouse, Hedgehog and Polecat'. This assessment concludes that, through significant grassland creation, hedgerow and tree planting, as well as the cessation of intensive agriculture and extension of marginal habitats outside of the solar arrays, the abundance of habitat suitable for these species post-construction is likely to increase. The

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				creation of these habitats, along with measures to enhance the riparian corridors running through the Sites, is also likely to aid the dispersal of these species through the local landscape. The Applicant would confirm that the ponds that the comment refers to were identified during the ecological walkover survey of the Cable Route Corridor, and the pond that lies within the Order Limits is categorised as 'Ponds - Priority Habitat' and depicted on **Figure 9.2.14 UKHab Survey Results (Cable Route 2 of 11) - Rev A** within the **Environmental Statement Appendix 9.2 Habitat Surveys (Revision A) [REP1-045]**. The Applicant has committed to avoiding impacts to this pond during the construction of the cable route through the implementation of Horizontal Directional Drilling, as detailed in response SMI-001 in **The Applicant's Responses to Written Representations at Deadline 1 [REP2-048]**.
KW-007	General Matters	Conclusion	The following is from every book by BB the renown author, artist and naturalist who was born and brought up in Lamport Rectory and lived his whole life in our county.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			"The wonder of the world, the beauty and the power, the shapes of things, their colours, lights and shades; these I saw, Look ye also while life lasts." Please do not despoil our precious and beautiful countryside.	

2.10 Keith Burrell

Table 2.10: [REP3-112]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KB-001	Glint and Glare	Glint and Glare Impacts on Aviation	Very Concerned about the lack of any regard to the impact on surrounding Airspace Users due the absence of 'Glint and Glare' modelling outside of the Safeguarding Aerodrome Guidance (2023) addition to CAA's CAP 738. a) Not every Flight will be Departing / Arriving at the Named Airfields / Aerodromes mentioned in the PEIR Vol. 3 Chapter 15. b) No understanding of the Visual Flight Rules (VFR) and degradation of cockpit visual sight lines because of the large geographical acreage area, due to the multi-site Installations of Solar Photovoltaic Panels and 'Glint and Glare'. c) Effort made to model 'Glint and Glare' impact on LOCAL Airfield and Aerodrome Environment and the attempt to address the need for 'Mitigation' amplifies the point that 'Glint and Glare' is a serious, significant distraction to Pilots on Flight / Approach Paths using VFR? The Airspace in the vicinity of the Development includes Navigational Way	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** There is no evidence from several decades of accident and incident data from the UK and the USA that solar PV installations pose a safety hazard to aircraft in the en route phase of flight – see Section 3 of the **Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes [APP-572]**. Neither the CAA nor the MoD, nor the Federal Aviation Administration (FAA) in the USA have issued any rules or guidance that suggest that solar PV installations pose a safety hazard to aircraft in the en route phase of flight. No NOTAM has ever been issued as a result of glint or glare from solar PV installations affecting pilots flying VFR in the UK. The Nene Valley is not a specific "Low Flying Corridor". The Green Hill Solar development is wholly contained within military Low Flying Area 6 (LFA 6),

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Point of Pitsford Reservoir, the NAVAID 'DTY VOR DME' West of Brixworth / Pitsford Reservoir which are significant Airspace for Visual Flight Rules (VFR and Instrument Flying Rules IFR) Air Traffic therefore used a lot by Pilots. How much 'Glint and Glare' affecting the Local Airspace has been considered and require a NOTAM to be issued due to potential Hazard for Pilots using VFR? Military Low Flying (e.g Nene Valley Low Flying Corridor although changes made to include all of the UK), except specific exclusion areas, is a significant area of Flying Activity where Fast Jets / Military Pilots also have to comply with VFR. How much reaction time will the pilot have on arriving low level to a wide area multi-site 'Glint and Glare' Solar Farm? d) How is Pre-Flight Planning practical when 'Glint and Glare' is variable due to time of Day, time of Year, outcome modified by fixed and / or tracking Solar Photovoltaic (PV) Panel Installations? e) With VFR obligations are you now stating that the avoidance of your Multi-Sites will be required because action a Pilot might need to take to safety avoid	which stretches from Downham Market to Banbury. There is no evidence that glint and glare from solar PV installations pose a safety hazard for low flying military aircraft and this issue has never been raised by the MoD as a concern. There is no evidence from multiple solar PV installations across the UK, Europe and North America that pilots avoid overflight of solar PV installations in order to avoid potential glint and glare hazards from those installations. There is no evidence that glint and glare from solar PV installations might prevent the Red Arrows performing low level formation aerobatic displays. Within danger area D324A – the designated Red Arrows training airspace around their base at RAF Waddington in Lincolnshire – there are two operational solar farms (Branston and Branston Extension) and one proposed 800MW solar farm (Springwell). In all three cases the planning authority considered potential glare effects on aviation safety and consulted the Ministry of Defence. In all three cases there was no objection on glint and glare grounds from the Ministry of Defence.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			an in flight hazard (e.g another aircraft etc.) will mean the Pilot will face additional 'Glint and Glare' hazard obscuring cockpit vision / sight lines? f) The Air Displays performed at Sywell Aerodrome on a regular basis also include the RAF Red Arrows (latest June 2024). Are Green Hill Solar Farm Developer NOW STATING that Red Arrows Air Displays can no longer be performed? Only a 'Fly Past' Event because of the result of Multi-Site large acreage 'Glint and Glare' impacting Safety / VFR Requirements for Air Displays? Accidents do occur, Visual Flight Rules (VFR) is there to reduce Risk but its' intention is significantly undermined if the Pilots visibility of the Airspace around his Aircraft is obscured due to 'Glint and Glare' levels not historically experienced in the UK except if the Aircraft Heading is towards the Sun's position in the Sky. I am disturbed by the lack of Official Guidance for Developers etc. to address 'Glint and Glare' away from or outside the Airfields / Aerodromes / Airports immediate 'Safeguard Area'.	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KB-002	Glint and Glare Alternatives and Design Evolution	PV Specification and Reflectance	We are not talking about the odd PV Panel or small number on some residential roofs. The Schemes NOW being Submitted by Developers to the Planning Inspectorate involve Multi Sites with Large Acreages with 100,000s PV Panels. The Green Hill Solar Farm (9 Sites, 500MW)) will involve up to a 1,000,000 PV Panels part of which is close to Sywell Aerodrome which hosted the Red Arrows Air Display in June 2024 where they fly low over my house (wonderful)! The Specification and Design of the Photo Voltaic Panel to be Purchased HAS NOT BEEN STATED. The Technology of the PV Panel allows for its' Design to incorporate Anti-Reflectance features including Anti-Reflectance / Glare Coating which may often be quoted as a Reflection of 5% or less. However, If a PV Panel is Tracking the Sun across the sky you might assume '5%' is not too much of a problem for a Pilot (Visual Receptor, Aerial) but multiply the 5% from a Single Large Panel by 10,000 or 100,000 PV Panels over a large acreage. Example of 2% Reflection (vertical very efficient) : - acreages involving 100,000's of 'Large Photovoltaic Panels	For the purpose of the glint and glare assessment, 'Smooth glass with Anti-Reflective Coating (ARC)' modules have been used to model the surface material of the arrays in order to ensure the worst case scenario is assessed. The technical specification of the panel will be chosen at detailed design stage in line with the parameters assessed and defined in the **Concept Design Parameters and Principles Document Revision A [REP1-151]**. The Applicant notes the comments on reflectivity, and refers to response to comment 'KB-001'.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			(made up by combining Single Panels) which logically means an example of a Single Panel with a Vertical Axis 2% Reflection / Glare not thought to be a hazard BUT when '0.02' is multiplied by 10,000 = '200 Panel' area with 100% Reflection / Glare; if '0.02' is multiplied by 100,000 = '2,000 Panel' area with 100% Reflection / Glare. Example of 10% Reflection (Sun at angle) : - acreages involving 100,000's of Large Photovoltaic Panels which logically means an example of a Single Panel with a Vertical Axis 10% Reflection / Glare might 'not' be thought to be a hazard BUT when '0.1' multiplied by 10,000 = '1,000 Panel' area with 100% Reflection / Glare; if '0.1' is multiplied by 100,000 = '10,000 Panel' area with 100% Reflection / Glare. N.B Add -on the impact of nearby multi-sites does 'Glint and Glare' become more meaningful to the Airspace Users and Air Display Teams (e.g Red Arrows) and the Air Races etc. at Sywell Aerodrome. My Green Hill Submission gave thoughts on an EXAMPLE for a generous 2% Vertical Reflection which related to the Sun being at 90 Degrees to the PV Panel's Horizontal Surface plane maximising the Anti-Reflectance	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Coating effect. This detail relates to the limited time the Sun is in this position w.r.t. Fixed Panels, but of course is a 'constant' for Tracking Panels HOWEVER, 'Tracking' may only be a Single Axis function (compared to the more expensive Dual Axis function) and therefore Time of Year / Sun's height above horizon also provides a question as to the Sun's Angle of Incidence to the Panel. I attach 2 Screenshots taken from the ForgeSolar Help Page 'About Reflectivity' and 'Module Reflectance Profiles'. These are important, especially for Fixed Panel Installations that the angle of incidence of the Sun to the Panel Surface may be quite high for many hours providing Reflected Light percentages greater than 10%. Green Hill has Fixed and Tracking (Single or Dual Axis) Installations. See link regarding the ForgeSolar Analysis Software Tool.	
KB-003	Alternatives and Design Evolution	PV Design	Therefore the 'Glint and Glare' issue could be a significant factor for Airspace Users and others not screened from the Solar Farm Sites on the ground e.g pedestrians / horse riders / vehicle drivers especially lorry drivers with high cabs not screened by hedges etc.	As summarised in ES Chapter 15 Glint and Glare [APP-052], both fixed panels and single axis tracking have been modelled to determine the potential impact from both design choices. As part of the maintenance phase, regular inspection will be undertaken of

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Extrapolation from 'Quality Data' not possible because the actual PV Panel Model and Specification not yet defined or the Fixed mounting angle or if Single or Dual Axis Tracking of the PV Panel which will probably not be the same on all Sites. N.B For Cost reasons 'Tracking' may only occur as a Single Axis Tracking installation? PV Panel technology deteriorates with Age, Anti-Reflectance properties can only be monitored / determined by regular Aerial Observation to check on 'Glint and Glare'. No mention of any ongoing continual Monitoring of this Major Engineering Specification Factor for lifetime of Operation and Panels being withdrawn / covered up when Failing Specification.	all equipment on site to identify any damage and ad-hoc replacement will be completed as necessary. Maintenance measures are secured through the Outline Operational Environmental Management Plan [REP1-131]. ES Chapter 4:Scheme Description [REP1-031] confirms that the Scheme would utilise a single-axis tracker system which tilts the Solar PV Panels around a horizontal north-south axis thus tracking the movement of the sun from east to west.
KB-004	Glint and Glare	Glint and Glare Impacts on Aviation	My Green Hill Submission referred to NAVAIDS , Navigational Waypoints i.e that a using Visual Flight Rules (VFR) or Instrument Flight Rules (IFR) will make use of to determine Location and Heading Setting. Green Hill Solar Photovoltaic Farm covers multi-sites and a wide geographical area. Subject of 'NAVAIDS and Daventry 'DTY VOR-DME' should prompt looking at an Aeronautical Map / Normal Map showing the NDB / VOR / VOR DME /	There is no evidence from several decades of accident and incident data from the UK and the USA that solar PV installations pose a safety hazard to aircraft in the en route phase of flight – see Section 3 of document APP-572. Neither the CAA nor the MoD, nor the Federal Aviation Administration (FAA) in the USA have issued any rules or guidance that suggest that solar PV

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			DME / TACAN (Military) / VORTAC etc. and plot them in relation to the Green Hill Site Areas. The point of this is that most Aircraft will have Cockpit Instrumentation to display the NAVAID information to the Pilot which helps with Flight Course / Aircraft location to assist with following VFR / IFR. Examples of Aircraft Routing / Headings and expectation of using the appropriate NAVAID (e.g NDB, DME, VOR) and flying a Course that takes the Pilot into an Airspace possibly affected by 'Glint and Glare'. It needs to be examined in conjunction with 'Modelling' data that IS NOT LIMITED TO 'Safeguarding Aerodromes' but includes a Common Sense application to local Low Flying Flights (Civil and Military).	installations pose a safety hazard to aircraft in the en route phase of flight. All en route aeronautical radio navigation aids in England are statutorily safeguarded under the terms of the The Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002. No part of the Green Hill development is within the 10km radius statutory safeguarding zone of any such aeronautical radio navigation aid.
KB-005	Major Accidents and Disasters	(General) Aviation Incidents	Lastly I come to the Subject of 'Engine Failure After Take Off' known as 'EFATO'. The historical location of the Airfields and Aerodromes amidst Countryside meant Pilots had the opportunity of dealing with Emergency of loss of Power by hopefully trying to land in a nearby field near the Airfield. The Green Hill Solar Farm Developers have TOTALLY IGNORED this aspect of Aviation Risk and the historical factors that allowed Pilots and Passengers to possibly 'Walk Away'	The EFATO risk was assessed at the design evolution stage for all aerodromes, airstrips and landing sites within 5km radius of any part of the Green Hill solar development, as recommended by CAA and aviation industry guidance. The results of that assessment were as follows: • Sywell runway 03L: no risk since no panels under climbout

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			from a Landing in a Field. The proposed acres of PV Solar Panel Sites close to Airfields and Aerodromes represents a very serious hazard deliberately introduced without regard to the prospect of a very high risk of serious injury and death when a Pilot is faced with an EFATO event. g) PV Solar Panel Safeguarding detail missing. If due to Physical Damage to Solar Farm Panel Installations in the Event of an Aircraft having to make an Emergency Landing in the fields / acreage (OR a vehicle leaving the road) these PV panels contain Self Generation of Electrical Power in daylight, is there Automatic Disconnection? No Mention in PEIR. h) The Physical DAMAGE to Electrical interconnection of the Photovoltaic Panels / Inverters etc. (involving Series or Parallel connectivity to multiply Voltages / Current) the resultant energy potential could be exposed to EMERGENCY RESPONSE PERSONNEL (ERP e.g Fire, Police, Ambulance etc.) arriving to render Life Saving First Aid etc. There is NO STATEMENT how, in practice, electrical safeguarding will be implemented to make SAFE the route for the ERP and	• Sywell runway 03R: no risk since no panels under climbout • Sywell runway 05: panel areas CF1 and CF2 removed to address EFATO concerns • Sywell runway 14: no risk since no panels under first 2km of climbout • Sywell runway 21L: no risk since no panels under climbout • Sywell runway 21R: no risk since no panels under climbout • Sywell runway 23: no risk since no panels under climbout • Sywell runway 32: no risk since no panels under climbout • Hold Farm runway 08: no risk since no panels under climbout • Hold Farm runway 26: no risk since no panels under climbout • Pitsford runway 12: no risk since no panels under climbout • Pitsford runway 30: no risk since no panels under climbout • William Pitt runway 02: design changes not required since area

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			crash victims (fire ignition source potential)? Most Sites are unmanned, remote monitoring? i) If the crash occurred before dawn then it could be Safe to enter the field to access the crash. However, with Sunrise the damaged Photovoltaic Panel Installations / Connections then become 'Live'. No information on the Electrical Configuration within the Fields to allow 'Very Localised' Isolation of the damaged areas for victims to be safety accessed by ERP? j) Information on Electrical Safeguarding should be built into the Initial Design and not as an after thought when trying to achieve a 'Fire Certificate' at the Commissioning Stage when it is too late to modify economically and the 'Compromise' leads to a 'Second best' outcome to achieve an unsatisfactory 'Electrical Safeguarding' Process Policy. k) There is no explanation of the substitute facility for achieving 'EXTERNAL MAINS ISOLATION' function for the Site if the Fire Service has to deal with a fire resulting from a crash into the Site? It is reasonable to expect the Airfield's Fire Tender to be the first on the Crash	to left of climbout is free of panels • William Pitt runway 20: design changes not required since area to right of climbout is free of panels • Tower Farm runway 10: no risk since no panels under climbout • Tower Farm runway 28: no risk since no panels under climbout • Easton Maudit runway 16: panels removed from strip under climbout in consultation with owner • Easton Maudit runway 34: design changes not required since no panels under first 600m of climbout and area to right of climbout is free of panels The solar farm will utilise a Supervisory Control and Data Acquisition (SCADA) system as a way to maintain safe operation of the asset. SCADA systems provide real-time monitoring, automated responses, and remote-control capabilities that can reduce risks for both equipment and personnel. SCADA enables operators to remotely disconnect or isolate specific

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Scene? How can they help Save Lives if the EFATO aircraft is located within damaged Infrastructure with Live Voltages?	components during maintenance or emergencies.
KB-006	General Matters	Attachments	N.B Attached Files : - CAA SafetySense Leaflet 13 Collision Avoidance Subject; CAST Advice Note 5; ForgeSolar Module Reflectance Profiles Screenshot; ForgeSolar Reflectivity Help Page Screenshot; Schiphol Airport Newsroom 21st August ; TravelTomorrow 25th August 2025 Dangerous Solar Panels Schiphol Airport; SKYWAY Code CAA CAP 1535 Extract re EFATO Engine Failure Pages 1 - 139 - 140.	The Applicant notes these submissions and has read them in context with the comments provided above.

2.11 Linda Twohey

Table 2.11: [REP3-114]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LT-001	General Matters	Introduction	I have been a resident of Walgrave Village for more than 32 years, and I am a member of Stop Green Hill Solar. The topic I wish to address in the next 10 minutes is the within site layout of Site A, and how different choices by the applicant could potentially significantly reduce the harm and impact on the local community, particularly in regard to the leisure use of the Quiet Lane, and at the same time also reduce the harm on hedgerows, red-listed birds of conservation concern, protected bats and on best and most versatile agricultural land. I will offer some proposals for inclusion in any DCO, should that eventually be granted. I shall conclude with a brief point about the NSIP process from a layperson's point of view.	Please refer to the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**
LT-002	Transport and Access Socio-economics, Tourism and Recreation	Route designation	At the public consultation in Walgrave in December 2024, the Applicant's representatives seemed unaware of the Quiet Lane designation of Newland Road, which divides Site A into east and west sections. This designation was granted in 2013 by Northamptonshire County Council on the request of	The Applicant refers to the comments made at **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP3-129]** at 'LT-002'.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Walgrave Parish Council. For anyone who is unaware, the definition of a Quiet Lane is a minor rural road prioritised for use by walkers, cyclists, horse-riders and the mobility -impaired, for leisure and recreation. Quiet Lanes are about appreciating the beauty and tranquillity of country lanes, rather than just travelling from A to B. They also seemed unaware that the green lane branching off Newland Road and running approximately northwards through the eastern section of Site A, was a grassy track well-used by villagers in long living memory, for walking and dog-walking, although lacking formal PRoW status. It extends for around 2/3 mile, a lovely walk along a high-point in the scenery with wide ranging countryside views, as I am sure was appreciated by the Planning Inspectors when you visited yesterday.	
LT-003	Alternatives and Design Evolution	Site Layout	At the consultation, and subsequently in my very detailed feedback form, I stated that if fields AF29 and AF14 were not used for the scheme, (please see APP-191 for field numbering, or CR1 -026) that could make a major reduction in the significant negative impact of the proposed development on people using Newland Road and the green lane, as these fields border more than half of the	Please refer to 'LT-006' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			affected east side of Newland Road, and more than half of the west side of the green lane. The views and tranquillity and countryside setting would be much better retained. (Field AF29 is triangular with it's pointed end where the Inspectors embarked from the minibus on the ASI yesterday).	
LT-004	Transport and Access	Construction Traffic Routing	I questioned why construction traffic would be routed from the Broughton Road to the north, through the east side, and then across the Quiet Lane through field AF29 into field AF10. Obviously it cannot come down a single track road, but why not access the west part from the Broughton Road nearer towards Old village, as is planned for the operational period, seen for example in APP-193? This would then avoid any potential closure of the Quiet Lane during the construction period.	Please refer to 'LT-006' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** As suggested in the response to LT-006, use of the Quiet Lane to provide direct access is avoided and instead access across the Quiet Lane between Green Hill A either side is proposed. The routes and access points are defined in the **Transport and Access Routes Supporting Document [REP1-167**]. The crossing movements will be managed to ensure the safety of existing users and no closure to facilitate these movements is planned. The use of the access further west on Broughton Road for construction was discounted due to the limited visibility at any access point and to avoid removing hedgerow or trees to facilitate this,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				particularly where the alternative proposed access arrangement is available.
LT-005	Alternatives and Design Evolution	Site Layout	I also suggested that the then proposed position of the substation, in field AF28 near the beginning of the green lane, was inappropriate, and it should be placed in perhaps field AF17, near the Broughton Road access, so that it was easily reached for maintenance and where it would do least harm visually.	Please refer to 'LT-003' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**
LT-006	Socio-economics, Tourism and Recreation	Recreational use of the green lane	Subsequently, I have submitted a relevant representation RR 0317, in which I detailed my use of Newland Road, and include the results of a Village Survey that I conducted in August 2024. This showed that of 95 respondents, 85 stated that they regularly used the Quiet Lane for recreational purposes. I have also submitted, as part of Stop Green Hill Solar's Written Representation, a document comprising 9 individual narratives from villagers REP-201, which describes these individual's use of the countryside locally and it's importance and meaning to them, including beneficial effects on health and well-being, most specifically mentioning the Quiet Lane.	The Applicant refers to the comments made at **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP3-129]** at 'LT-002'. The Applicant has responded to Ms Twohey's Relevant Representation **[RR-0317]** in **Applicant Responses to Relevant Representations [REP1-161]** under the themes of 'agriculture and soils', 'alternatives and design evolution', 'cultural heritage', 'ecology and biodiversity', 'energy need and policy', 'human health', landscape and visual impact', 'principle of development', and 'socio-economics, tourism and recreation'. The Applicant has also responded to the surveys undertaken by Ms Twohey as

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				submitted at **[REP1-201]** in the **Applicant's Responses to Deadline 1 Submissions [REP2-050]**.
LT-007	Alternatives and Design Evolution Consultation	Site Layout	I have therefore been very disappointed that none of these submissions seem to have been considered, or any adjustment made to the Applicant's plan to take account of the Quiet Lane. I thought that the point of gathering the views of the local communities was to give them weight, and try to find more mutually acceptable solutions. And I could not find in the documents a rationale for the fields that have been selected for mitigation, or what 'ecology' was being mitigated for. It appears that the Applicant does not need to justify the reasons for the decisions taken.	Please refer to 'LT-002' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**
LT-008	Ecology and Biodiversity	Impact on ecology	With reference to fields AF29 and AF14, taking these 2 fields out from solar panel use, and re-routing the construction access, would also reduce the damage to important hedgerows see APP 192, as these fields' hedgerows comprise a high percentage of those in Site A. As mentioned by Richard Humphreys KC, representing SGHS, at ISH2 on Tuesday, in AOB, field AF29 is also nearly all in agricultural land classification Grade 2, (as seen in APP -	Please refer to 'LT-001' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].** The Applicant has followed a step-by-step site selection process which confirms the location of the Scheme is suitable for a large-scale solar farm. Details of the process are set out **in ES Appendix 5.1: Site Selection Assessment Revision A [REP1-037]** Please also refer to **ES Chapter 5:**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			172) clearly BMV land whose use should be avoided. With regard to the substation, where the cabling route exits Site A, the ground level tree assessment results for suitability for roosting bats, seen in APP-089, shows that most of the high suitability trees in Site A are clustered around the edge of field AF24, exactly where the substation has now been placed. Bats are all protected species; so the noise and light pollution from a substation close to so many potential roosting areas is completely inappropriate and may be unlawful. Skylarks have been found in the highest density in Site A, but nearly all the indicative territory cores as seen in APP-091 p.101 will be lost. Taking fields AF29 and AF14 out as well would make a significant difference to the number retained. I also know from personal observation over decades, that yellowhammers, another red-listed bird of conservation concern, are almost invariably seen in the hedgerows of field AF29.	**Alternatives and Design Evolution [APP-042].** The land quality of the parcels within the Site includes land of BMV quality. Policy does not require that solar development avoid the use of land of BMV quality, but that where BMV land is included this should be justified. **ES Chapter 5: Alternatives and Design Evolution [APP-042]** and **Appendix 5.1: Site Selection Assessment [REP1-037]** provides this justification.
LT-009	Alternatives and Design Evolution Consultation	Site Layout	I suspect that the main fields chosen not to be designated for solar panels are for reasons such as impact on the current landowner and tenants' views,	Please refer to 'LT-002 and LT-003' within the Written Summary of the Oral Submissions at the Open Floor Hearing

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			underlying important archaeology, and inappropriate gradient and slope direction, and important ecology around the significant stream in the west part of the site. So in conclusion, it is my feeling and the general opinion of other villagers, that insufficient regard was paid to their views by the Applicant after the public consultation, as this did not seem to inform or alter their plans in any significant way to the layout of Site A.	2 and the Applicants Response **[REP3-129].** **ES Chapter 5: Alternatives and Design Evolution [APP-042]** sets out the reasoning for design choices made at Green Hill A.
LT-010	General Matters	Concluding Recommendations	So I would like to, respectfully, propose the following – if the Planning Inspectors are minded to recommend granting a DCO: - That field AF29 and preferably AF14 are removed from the scheme (retained as arable land or used for ecological mitigation). This would considerably reduce the adverse landscape and visual, noise and glint and glare effects for users of the Quiet Lane, and help, at least partially, preserve the countryside setting and tranquillity. - That both for construction as well as operational maintenance, access to the west side of Site A should be from the Broughton Road access called A-2 as in REP-157. This would remove the need	Please refer to 'LT-002' and 'LT-003' within the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Response **[REP3-129].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			for construction vehicles to cross Newland Road from east to west. - That the current permissive path along the Green Lane is made an official PRoW, as any landowner can remove permissive access at any time.	
LT-011	General Matters	DCO Process	And to finish with some views about the NSIP process; I wish to say that I consider myself to be an intelligent layperson, having worked as a hospital doctor for over 40 years, and yet I have found the whole process surrounding the proposed Green Hill Solar Farm fairly unfathomable. It has required an enormous amount of time and effort, helped by grouping together with other like minded individuals, to try to understand what was going to happen, and how we as individuals in affected communities could have any influence. The initial documentation produced for the public consultation was thousands of pages long, with much repetition. Trying to get to grips with the contents was very challenging. Most people I know in my village could barely attempt it, and this was well-nigh impossible for those who are not used to accessing information digitally. As for the documents now on the Planning Inspectorate website, these	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			now number 1099, and some are more than a hundred pages long. There are probably more than 50,000 pages. It is very difficult to see how this process is compatible with living in a democracy where local people should be involved in major planning decisions affecting their communities. Without the involvement and guidance of paid experts, paid for out of our own hard-earned income, we feel we would have had little chance of getting our voices heard in an effective manner.	

2.12 Lisa Rowlinson

Table 2.12: [REP3-115]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LR-001	Noise and Vibration	Noise Survey Methodology	Existing noise environments are highly likely to be overstated in areas where the noise receptor was placed near a busy road. Properties are often set back from the road or shielded meaning representative noise levels are highly likely to be overstated and, as a result, internal operational noise is being shown as less significant than it actually would be. BS 4142 explicitly warns that context matters. The applicant's assertion that the methodology was carried out 'in accordance with current policy and guidance' and 'agreed with all relevant statutory bodies' in their Responses to Written Representations at Deadline 1 does not demonstrate adequacy as real world application of methodology must be site and receptor specific. Distance to the proposed solar farm and noise sources does not equate exposure and subsequently harmful impact. Property A may be closer than Property B but Property A may be shielded by terrain, vegetation or buildings and experience less of an impact. Some of the sensitive noise receptors chosen have no windows facing the proposed solar farm so these are unlikely	The assessment presented in **ES Chapter 14: Noise and Vibration [APP-051] and the ES Addendum Chapter 14 Noise and Vibration [REP1-168]** is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of the Scheme and nearby existing sensitive receptors. Modelling results that informed the BS4142 assessment takes into account the land topography, existing intervening screening between the noise source and receptor. The assessment results predict that noise levels from the Scheme are predicted to be no higher than the representative background noise levels at the closest sensitive receptors during the daytime and night-time periods with the appropriate mitigation measures incorporated. This is an indication of a Moderate/ Minor effect and not significant. Receptor selection is not determined solely by whether a particular façade faces the Scheme. The model assumes windows will face the noise source, which provides a precautionary worst-case scenario irrespective of the actual orientation of windows or building layout.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to be the worst affected properties as other properties at a very similar distance will face the proposed solar farm. Napier's research shows that orientation of the source matters and the applicant states 'the glazing element is the weakest path for external noise intrusion into internal areas' in their Responses to Written Representations at Deadline 1 so choosing properties that are not facing the proposed solar farm and assuming they are the worst affected is methodologically flawed. As a result, the noise impact is highly likely to be understated as no meaningful assessment of which property is most exposed to noise, and would be the most impacted, has been made.	The closest residential properties to each site are outlined in Table 14.12 of **ES Chapter 14: Noise and Vibration [APP-051]**. These receptors are considered to be the most noise sensitive, as effects from the Scheme will be higher at these locations than at receptors located further from the Scheme. Background sound levels measured at the nearby residential properties listed in Tables 14.13 to 14.18 **[APP-051]** are considered to be representative of the background noise environments at other properties in similar nearby locations. On this basis, should the predicted noise levels from the Scheme comply with limits at these assessed residential property receptors, predicted noise levels at receptors further from the Scheme will also comply.
LR-002	Noise and Vibration	Unassessed receptors	Second floor bedrooms within the roof are of a much higher level than 4m above ground level so have unreasonably not been assessed and their omission renders the Environmental Statement incomplete. Some will face directly toward elevated sources of noise for this proposed solar farm which will increase the impact even further. World Health Organisation (WHO) guidance emphasises the importance of	Calculations have been undertaken to determine the potential noise and vibration impacts onto the sensitive receptors considered to represent worst-case with respect to direct noise from the site. Façades of the nearest noise sensitive properties to the development site have been represented.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			protecting bedrooms at night so second floor bedrooms need to be assessed. Second floor bedrooms within the roof are structurally different and often more exposed compared to lower floors. To treat them as equivalent would be methodologically unsound. Second floor bedrooms within the roof are typically mainly constructed of timber frames, plasterboard linings and tiled coverings which have a weaker acoustic performance compared to brick therefore Napier's findings about dB reduction cannot be applied to them. Napier's research also explicitly states 'a thorough knowledge of the acoustic transmission characteristics afforded by the building envelope is therefore desirable to assist in the setting of threshold levels and to aid in the design and verification of development proposals.'	Results of the first and second floor levels have been considered. Notwithstanding this, BS 3632:2015 stipulates that external walls and roofs of lightweight constructions for homes/extensions must be designed to achieve a minimum sound insulation laboratory performance rating of 35dB Rw. This performance can typically be achieved with an external wall/roof construction comprising a timber stud building envelope system. There is a requirement within the standard to also ensure an adequate thermal performance is achieved. This would invertedly provide a greater acoustic performance. It should also be noted that the Napier's findings about dB reduction applies to window openings and not the direct reduction through a external wall construction.
LR-003	Noise and Vibration	Assumptions and Limitations	BS 4142 explicitly states that if noise has tonal, impulsive, or intermittent characteristics, a correction must be applied to the rating level if it is audible at the receptor. The applicant has stated in their Responses to Written Representations at Deadline 1'it is considered that any intermittency associated with the proposed operations is unlikely to be readily distinctive against the residual environment' implying that	Responses to Written Representations at Deadline 1 **[REP2-050]** remain valid given the assessment results predict that noise levels from the Scheme are predicted to be no higher than the representative background noise levels at the closest sensitive receptors during the daytime and night-time periods with the appropriate mitigation measures incorporated. The results were informed by manufacturers

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			manufacturer's data is indicating that the tonal, impulsive, or intermittent characteristics of the noise will be audible at receptors. Real world conditions can introduce characteristics not captured in manufacturer's data as well so it is essential assessment of perceptibility at receptors is carried out. For some areas of the scheme, the source of the noise is at a higher level than the road due to the sloping terrain. By dismissing penalties without assessment, the applicant has highly likely understated noise levels.	data and therefore considered to be of low risk of understated noise levels.
LR-004	Noise and Vibration	Unassessed receptors	The Environmental Statement unreasonably fails to consider impacts on animals. Noise and vibration can cause distress to dogs, cats, horses and other animals. The applicant states in Environmental Statement Chapter 14: Noise and Vibration 'where noise and vibration effects are assessed to be not significant at the closest receptors, effects at all other receptors will also be not significant, regardless of sensitivity'. However, not all receptors are equally sensitive to impact so the applicant's methodology is flawed and breaches Environmental Impact Assessment (EIA) Regulations.	**Environmental Statement Volume 1, Chapter 14: Noise and Vibration [APP-051]** has considered the assessment of likely significant effects in respect to noise and vibration of the site during operation (as well as construction, and decommissioning phases of the Scheme). The assessment is supported by a baseline noise survey of the Sites, which characterises the existing noise environment at and in the vicinity of the Scheme and nearby existing sensitive receptors. Noise predictions and subsequent assessments of impacts have been carried in accordance with current policy and guidance, and the methodology discussed and agreed with all relevant statutory bodies.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LR-005	Glint and Glare	Assessment methodology	Unreasonably, upper floors have not been assessed and assumptions about non occupancy during daylight hours are methodologically unsound, fail to reflect real world use and render the Environmental Statement further incomplete. Glint and glare is a health and safety issue as well as an amenity issue. The applicant has repeatedly ignored statements highlighting the omission of upper floor windows and has failed to rectify the omission. Proportional mitigation cannot be implemented without full assessment. Therefore, it is reasonable and necessary to require removal from the scheme of all fields visible from dwellings with first floor or second floor windows overlooking the proposed site.	Receptors assessed within the Glint and Glare Assessments are as recommended within industry guidance and best practice (Ref 1.1), and has been included for other, approved, DCO Solar applications.
LR-006	BESS Major Accidents and Disasters	BESS Fire	The Applicant's statement that an Emergency Response Plan (ERP) will be developed post consent following NFCC and NFPA 855 guidance does not demonstrate adequacy. Remote operation of a BESS site has repeatedly been identified as a factor delaying the emergency response to a BESS fire and hindering firefighting efforts. Despite this, the Outline Battery Storage Safety Management Plan (Revision A) still relies on remote operation as it states the BESS is anticipated to have '24/7 remote	Emergency Response Plans (ERPs) can only be drafted when based upon a specific BESS design. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			monitoring of the system via a dedicated control facility. The control facility will have the capability to shut the system down should the need arise and will also be responsible for implementing the emergency plan and acting as a point of contact for the emergency services'. This shows the applicant has failed to address the documented real world issue of delayed response with remote operation and leaves a critical gap in safety and emergency planning.	Section 5.4.4 of the O**utline Battery Storage Safety Management Plan** (OBSSMP) **[REP1-143]** stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: "*Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure*." Section 6.1.8 of the OBSSMP stipulates: "*Emergency Response Plan(s) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation NFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community.*" This is secured through **Requirement 6 of Schedule 2 to the Draft DCO Revision C [EX3/GH3.1_C].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The comments made regarding remote monitoring of the BESS systems are inaccurate. 24/7 remote monitoring of BESS systems is required by NFCC guidance and NFPA 855 (2026) safety standards. Section 4.3.1 of the OBSSMP stipulates the following monitoring requirements: The BESS will be monitored by two on Site control facilities, one control room located on Green Hill BESS site and one located at Green Hill C site, as well as 24/7 monitoring by a remote-control facility provided by the BESS manufacturer or operator. • The control room (when operational) will be responsible for the security of the Site with state-of-the-art detection and monitoring systems. These can be repurposed in an emergency to support first responders; • The control room will have the ability and authority to immediately shut the system down should the need arise; • The control room (when operational) will be responsible for the implementation of the emergency plan acting as a point of contact to emergency services;

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				• Staff will be fully trained and familiar with the BESS technologies and will be responsible for alerting NFRS and if required, for connecting NFRS with BESS incident Subject Matter Experts (SMEs); • The 24/7 remote control facility will monitor the security of the BESS site, and monitoring and detection systems will be repurposed in an emergency to support first responders. NFPA 855 (2026) (Ref 3) defines the minimum monitoring and control standards; • The 24/7 remote control facility will have the capability to immediately shut the system down should an incident occur, and the need arise. It can also implement the ERP, acting as a point of contact to the emergency services; • In some circumstances it will be necessary to discharge the batteries to enable the first / second responders to deal with the incident. This capability could potentially be achieved through the 24/7 remote control facility. The precise methodology in this regard will be agreed in the ERP once the detailed design of the BESS is known. This will be prepared in conjunction with NFRS and is secured through this document.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LR-007	Hydrology, Flood Risk and Drainage	BESS Site	The Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS (Revision A) incorrectly claims the site is wholly in Flood Zone 1 contradicting the Environment Agency's (EA's) classification. The applicant's updated site specific Flood Risk Assessment (FRA) for Green Hill BESS relies on a partially updated 1D model produced by the EA in 2013 which contains data from the 1980s-2000s. A linked 1D–2D model with up to date data or a bespoke model with up to date data should be used as this site is not a low-vulnerability solar NSIP as stated by the applicant. The current and future risk in floodwater spreading across the site must be adequately quantified as it is critical for safety and emergency planning of the site as it is within Flood Zone 3. Overall, the applicant has failed to adequately address previously identified issues, leaving them unresolved and in breach of legislation	The Applicant does not state that the Green Hill BESS site is wholly within Flood Zone 1. **Appendix 10.11: Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS [APP-108]** confirms that, based on the Environment Agency's Flood Map for Planning (updated March 2025), parts of BESS1 and the majority of BESS2 are shown within Flood Zones 2 and 3, with the remainder in Flood Zone 1. The flood risk assessment and the proposed layout respond to this mapping through a sequential approach within the site, locating the most sensitive infrastructure within areas of lowest flood risk where practicable, and applying embedded resilience measures where development is located within the mapped extents. The Applicant does not rely solely on historic mapping or a legacy model. The Environment Agency provided hydraulic model outputs for the relevant main river system, and Arthian undertook additional hydraulic assessment to provide a site-specific understanding of flood behaviour at the BESS site, including 1D modelling for the main river interactions and a 2D direct rainfall assessment for the small ordinary watercourse within the locality. This approach is proportionate to the Scheme design stage and has been

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				progressed through consultation with the relevant risk management authorities, with embedded mitigation measures incorporated to manage residual risk. The purpose of the assessment is to ensure that (i) the Scheme is safe for its lifetime, and (ii) it does not increase flood risk elsewhere. **Appendix 10.11: Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS [REP1-057]** and **Chapter 10: Hydrology, Flood Risk and Drainage [REP1-023]** set out the embedded mitigation and operational controls that ensure the BESS can be made safe and resilient, including finished level strategies, equipment raising and waterproofing where required, flood warning and site management procedures, and drainage measures to ensure greenfield runoff control and no increase in off-site flood risk. In addition, pollution control measures (including automatically closing isolation valves in the event of a fire) are embedded within the design and secured through the control documents for the BESS and drainage strategy. On that basis, the Applicant considers the flood risk evidence base for the BESS to be complete and proportionate for the DCO stage. The Applicant does not agree that a bespoke new 1D–2D model is necessary to

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				demonstrate acceptability, noting that the assessment has already quantified flood risk using the best available datasets and modelling outputs, and the Scheme incorporates embedded mitigation and operational controls to manage residual risks for safety and emergency planning.

2.13 Mark Shepherd

Table 2.13: [REP3-116]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MS-001	General Matters	Introduction	This report presents an engineering opinion of the impact of the glint, glare and visual impact associated with the Green Hill G (Lavendon) section of the proposed Green Hill photovoltaic (PV) solar farm. The opinion herein contains both general concerns that may have already been addressed in the Developer's Reports, as well as some comments specific to the Developer's Reports where omissions or misrepresentations may have provided misleading information to the public, in particular the residents of Lavendon. The increasing deployment of large-scale photovoltaic (PV) solar farms in rural and countryside locations have raised concerns regarding visual impact, particularly the issue of glint and glare from panel surfaces. While solar technology has advanced significantly in efficiency and coatings to reduce reflection, these effects cannot be fully eliminated. This opinion evaluates the potential impacts of glint and glare, their measurement, the limitations of current photovoltaic manufacturing processes, as well as visual impact matters that may have been omitted from reports.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The analysis is presented from a technical standpoint with a focus on rural siting implications. The proposed site for the Green Hill Solar Farm that forms the basis of this report is Green Hill G in relation to the Village of Lavendon is as follows: [image in original representation showing Green Hill G] The following reports have informed the opinions contained in this document: • EN010170-000045-GH7.16_Design Approach Document • EN010170-000046-GH7.17_Concept Design Parameters and Principles • EN010170-000052-GH7.23_Policy Compliance Document • EN010170-000057-GH7.28_Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes • EN010170-000076-GH6.3.8.1_ES Appendix 8.1_LVIA Methodology_Part 1&2 of 2 • EN010170-000078-GH6.3.8.2_ES Appendix 8.2_Scoping LVIA Receptor Sheets • EN010170-000168-GH6.3.15.5_ES Appendix 15.5_Green Hill G Ground Based Receptor Results • EN010170-000205-GH6.2.8_ES Chapter 8_Landscape and Visual Impact Assessment	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• EN010170-000212-GH6.2.15_ES Chapter 15_Glint and Glare • EN010170-000212-GH6.2.17_ES Chapter 17_Socio-Economics Tourism and Recreation • EN010170-000297-GH6.4.8.6.5_ES Figure 8.6.5_Landscape Receptors Green Hill G • EN010170-000298-GH6.4.8.6_ES Figure 8.6_Landscape Receptors • EN010170-000303-GH6.4.8.7.5_ES Figure 8.7.5_Visual Receptors Green Hill G • EN010170-000304-GH6.4.8.7_ES Figure 8.7_Visual Receptors • EN010170-000345-GH6.4.8.10.5_ES Figure 8.10.5_Viewpoint Locations Green Hill G • EN010170-000346-GH6.4.8.10_ES Figure 8.10_Viewpoint Locations	
MS-002	Glint and Glare	Factual statement	Glint and glare refer to the unwanted reflection of sunlight from the surfaces of solar panels. Glint is a brief, intense flash of reflected light, often associated with specific geometries between the sun, panel, and observer. Glare is a sustained reflection that can cause visual discomfort or impairment. While solar modules are generally designed with anti-reflective coatings to maximize absorption, reflection is unavoidable to some degree because no	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			surface can absorb 100% of incident light across all wavelengths and angles. Current reflection values for PV panels are typically between 2–10% of incoming solar radiation.	
MS-003	Glint and Glare	PV Panel specification	The Developer's reports do not appear to state the type or manufacture of the proposed PV panels. It is not known whether Anti-Reflective (AR) coatings, surface texturing or Interdigitated Back Contact (IBC) cells will be used – there appears to be no investigation into the pros and cons of different solar panels, nor any recommendations in this regard, included in the technical reports, just some general statements. The choice of the actual panel itself may prove to be important, and certainly necessary in order for a more accurate representation of the impact of the proposed solar panels. It is acknowledged that no current photovoltaic panel can completely absorb all incident light. The theoretical maximum efficiency of a single-junction silicon solar cell is limited by the Shockley-Queisser limit, which caps efficiency at approximately 33.16%. The remaining energy is lost as heat or is reflected. While manufacturers have reduced reflectance to as little as 2% for some panels under	Please refer to response to comment 'KB-002' of this document in regard to the use of Anti-Reflective coatings. The technical specification of the panel will be chosen at detailed design stage in line with the parameters assessed and defined in the **Concept Design Parameters and Principles Document Revision A [REP1-151]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			specific conditions, a small amount of reflection is inherent in the physics of light-matter interaction. Complete absorption would violate fundamental principles of thermodynamics and optics.	
MS-004	Glint and Glare	Units of measurement for light	While light output is commonly expressed in lumens or lux, these units do not fully capture the specific visual impacts of glare. Regulatory assessments instead use luminance (cd/m²) and geometric solar modelling (such as the Federal Aviation Administration's Solar Glare Hazard Analysis Tool, which is also referenced in UK planning contexts). It is not clear if this method of determining the extent of light output has been included in the Developer's reports.	The **Glint and Glare Assessment [APP-052]** has been undertaken using ForgeSolar. This modelling software is built with Federal Aviation Administration's Solar Glare Hazard Analysis Tool (SGHAT) technology.
MS-005	Glint and Glare	Time-of-Day and Seasonal Effects	In a rural UK context: • Morning glint from east-facing arrays will coincide with peak commuting periods and agricultural operations. • Evening glare from west-facing panels may affect highways and rural residences during sunset, raising potential for visual hazard. • During winter months, when the solar path is lower in the sky, the risk of glare is materially increased. These factors raise legitimate planning concerns under the National Planning	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Policy Framework (NPPF) Paragraph 185, which requires that new development "avoid noise and other adverse impacts on health and quality of life" — including light pollution.	
MS-006	Glint and Glare	Panel Degradation and Long-Term Risk	Anti-reflective coatings applied to PV modules are not permanent and deteriorate over time due to: • Weathering and abrasion from rain, frost, and windborne particles; • Soiling from dust, pollen, and agricultural activity; • Panel discolouration and surface micro-cracking over the lifespan of the installation. Such degradation can increase stray reflections, both specular and diffuse, thereby worsening glare impacts as the development ages. This raises compliance concerns with NPPF Paragraph 55, which requires developments to be "sustainable for the lifetime of the development," not merely at the point of installation. As per comments in Section 4.0 there appears to be no investigation into the pros and cons of different solar panels, nor any recommendations in this regard, included in the technical reports. The overall contribution of deterioration to glare is complex and can be both	Please refer to response to comment 'KB-003'. As part of the maintenance phase, regular inspection will be undertaken of all equipment on site to identify any damage and ad-hoc replacement will be completed as necessary.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			mitigating (due to diffusion) and exacerbating (due to coating breakdown or damage). Precise documented and studied long-term data on this phenomenon is limited and would require site-specific modelling over the lifetime of the project. This has not been acknowledged in the Developer's reports	
MS-007	Glint and Glare Socio-economics, Tourism and Recreation Landscape and Visual Impact	Glint and glare to recreation in the countryside	In rural environments, glint and glare have several implications. In our village's country trails, particularly the Three Shires Way, horses are ridden and cyclists, athletes and hikers are drawn to the country atmosphere and natural beauty. To have a recreational facility whose attractiveness would be severely negatively affected by an unnatural intrusion and exacerbated light intensity during peak reflection times appears not to have been taken into consideration. From a landscape character perspective, we have concerns with strong reflective flashes being incongruent with natural countryside settings. Given that glare is most prominent during sunrise and sunset—times when rural populations may be commuting, working in fields, or engaging in outdoor activity—the potential impact may be more pronounced than in urban or industrial settings.	Please refer to the responses set out at 'KG-001' to 'KG-003' above.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			It appears as though no modelling has been undertaken for users of the Three Shires Way (TSW) – despite high usage and narrow path making glare unavoidable. Equine safety risks specifically have been glossed over. The Developer's reports comparisons to natural reflections are inaccurate, and guidance from the British Horse Society misapplied. This constitutes a misrepresentation of facts and avoidance of relevant guidance – this needs to be investigated correctly and included in the Developer's reports for completeness and transparency. A personal rendering of the impact of the proposed PV panels on horse-riding along the Three Shires Way is as follows: [image in original representation]	
MS-008	Landscape and Visual Impact	Visual Impact	The Developer's reports on Glint and Glare, Visual Receptors Green Hill G and Landscape and Visual Impact Assessment provide misleading evidence and have omitted significant assessments that are relevant to the assessment of the proposed development. A summary of the viewpoints used for Green Hill Site G have been shown below. What is entirely misleading is that the viewing points have been taken from the	The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation. MKCC have requested for additional winter photography from 3 additional viewpoints from the following locations: • From roundabout intersection of the A428 / A509 looking towards the Site. • From the A428 looking north across parcel GF13.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			boundaries of the development only, not from the perspective of the village. From VP40, the following images were provided (2/3 of a 360° view pointing inwards to the development) From VP41, the following image was provided (2/3 of a 360° view pointing inwards to the development). Only one spliced photo has been included, completely misrepresents the actual situation, and totally ignores a viewpoint that includes Three Shires Way What is concerning is that all the visual receptor points have been taken from the edges of the development, pointing inwards, which doesn't actually represent reality and provides a very misleading documentation of visual impact. A far more representative perspective that captures the actual visual impact has to be from our village itself, not from the perimeter of the development as demonstrated below	• From Bridleway MK|Lavendon|004 (TP220) looking south towards GF13. These will also be prepared as fully verifiable (Type 4), fully rendered (AVR Level 3) visualisations in accordance with the Landscape Institute TGN 06/19. Photography was undertaken in December 2025 and the Applicant aims to submit the photomontages by Deadline 5.
MS-009	Landscape and Visual Impact	Visual Impact from Lavendon village	The extent of Green Hill Site G has been captured in polygons and overlaid in Google Earth. Site lines have been created from the Village of Lavendon at different angles towards the development and the elevation profiles captured (included in Annexure A). Google Street View has been used on these site lines from the	The Applicant notes these comments and is confident in the conclusions of the LVIA, which includes an assessment of visual effects from the village of Lavendon (RS16) which identifies Minor Adverse effects at Construction, Year 1 and at Year 15 through to decommissioning as a result of potential glimpsed views of infrastructure

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			perspective of the village and images captured in Annexure B. The white and yellow lines visible in the images is the location of the PV panels in Site G. Using this information, the following area would be directly visible from the Village of Lavendon (this type of assessment appears to be lacking in the Developer's reports)	within Site G, namely parcel GF13 from properties on the northern edge of the settlement. Technical photography for LVIA must be undertaken in accordance with strict requirements set out within the Landscape Institute's TGN 06/19 on visualisation of development proposals. Google Earth and Google Street View do not meet the requirements of this guidance.
MS-010	Landscape and Visual Impact	Horizon Distortion	Apart from the visual impact assessment, it is not clear if the issue of horizon loss or horizon distortion has been included. Horizon loss or horizon distortion is the adverse aesthetic or perceptual impact that occurs when an introduced artificial structure (such as a building, solar array or wind turbine) intercedes or obstructs the natural, uninterrupted line of sight to the horizon, sky, or continuous natural ground plane. It is a form of visual degradation where the perceived boundary between land (or water) and sky is broken, flattened, or replaced by a human-made element, thereby reducing the sense of spaciousness, visual clarity, and scenic quality. Types of loss, descriptions, and effect on user experience:	A detailed LVIA methodology that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included within ES Appendix 8.1 **[APP-078 & APP-079]**, which has been progressed and agreed with the Local Planning Authorities. The LVIA **[APP-045]** has been undertaken in accordance with the LVIA Methodology contained within Appendix 8.1 of the Environmental Statement **[APP-078 & APP-079]**. Section 1.7 of the LVIA Methodology sets out in detail the requirements for undertaking the Assessment of Visual Effects and the various stages and consideration required. The Visual Assessment includes consideration of, but not limited to, the scale of the change in the view with respect to the loss or addition of

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Loss of Continuous Skyline A tall structure (like a block of housing or industrial facility) visually chops the horizon into pieces or replaces the natural crest of a hill with a straight, artificial roofline Diminishes Scale: The viewer loses the sense of vastness and feels hemmed in or confined Foreground Dominance A structure placed too close to a viewing point (like a trail) becomes the dominant visual element. The viewer is forced to focus on the near-field development instead of the distant, natural landscape. Destroys Immersion: The scene changes from a view into the countryside to a view of the building, negating the escape experience Visual Scarring The structural or material texture of the artificial element (e.g., metal panels, concrete, sheer walls) contrasts sharply with the soft, organic textures of the national environment, creating a jarring interruption Breaks Harmony: The experience of nature is replaced by an awareness of the adjacent human development and in permanence.	features in the view and changes in its composition, including the proportion of the view occupied by the Scheme, this includes consideration of the changes that a development would have on views of the horizon.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MS-011	Planning Policy	Policy and Legislation	UK planning decisions must consider the following: • NPPF Paragraphs 152–158: Renewable energy is supported but must balance environmental benefits against localised impacts. • NPPF Paragraph 185: Requires that new developments avoid unacceptable visual disturbance and light pollution. • Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Require assessment of visual, residential, and transport safety effects. • CAA Guidance (CAP 764): Requires formal glare assessments where aviation or visual navigation could be compromised. In this context, failure to adequately mitigate glint and glare effects would render the proposed development inconsistent with UK planning policy.	The Applicant has taken note of NPPF and Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in the submission. Embedded mitigation has been proposed. With embedded mitigation in place, the residual effect for the Scheme is Minor Adverse, and therefore Not Significant. CAA Guidance (CAP 764) "Policy and Guidelines on Wind Turbines" is not relevant for glare assessment from solar panels. Aviation receptors have been considered within the glint and glare assessment, as detailed in the **Environmental Statement Chapter 15 Glint and Glare [APP-052]** and **relevant Appendices [APP-160 to APP-165].**
MS-012	General Matters	Conclusion	From the Developer's reports made available it appears as though certain aspects of the visual impact assessment have been misrepresented and/or omitted which require further and comprehensive investigation. On technical and regulatory grounds, the proposed solar farm presents a material risk of glint and glare impacts as well as	The Applicant notes these comments and refers to its responses above..

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			visual impedance which cannot be fully mitigated by current technology. Key points include: • Degradation of panels over time is likely to increase reflective hazards, contrary to the NPPF requirement for sustainable, long-term mitigation. • No current or foreseeable PV manufacturing process can eliminate glare entirely. • Glare is most intense during sunrise and sunset, coinciding with high levels of rural activity and commuting. • Countryside settings with open sightlines exacerbate the distance and duration of impact. • Loss of continuous skyline and visual scarring has a material and tangible manifestation in terms of horizon distortion • Visual impact from the perspective of the village has not been considered. The available report content and conclusions in their current form do not provide sufficient evidence that the Developer has adequately addressed all aspects of the impact of the development. On these grounds I have an objection to the Developer's evidence and reports concluding that glint and glare and visual impact will not have a negative impact to the surrounds.	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MS-013	General Matters	Professional Disclaimer	[see original representation]	The Applicant notes these comments.

Table 2.14: [REP3-117]

Please refer to Appendix A where this submission has been responded to in full.

2.14 Michael Griffiths

Table 2.154: [REP3-118]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MG-001	Hydrology, Flood Risk and Drainage Ground Conditions and Contamination	Assessment of Green Hill G	Engineering Report: Assessment of Surface Water Runoff from Proposed Green Hill Solar Farm (Green Hill G) Attached and resubmitted (previously submitted **[REP1-215]**)	The Applicant has responded to issues raised within this report in 'SGHS-001' to 'SGHS-012' in Table 3.1 of **Applicant Responses to Deadline 1 Submissions [REP2-050]**.
MG-002	General Matters	Introduction	Good morning. My name is Michael Griffiths, and I am a resident of Lavendon. I am speaking today in support of the written representation I have submitted, which is accompanied by the engineering assessment titled "Assessment of Surface Water Runoff from Proposed Green Hill Solar Farm (Green Hill G)." My oral statement follows the same structure as my written submission, and I will highlight the key points here today.	The Applicant notes this comment and has responded to each point individually in 'MG-003' to 'MG-009' below.
MG-003	DCO Process	Procedural Matters	Before turning to the technical evidence, I want to raise a procedural matter which affects fairness and transparency. When registering to attend and speak, the Planning Inspectorate's online form required participants to reference documents from the list of received	The Applicant notes this comment as addressed to the PINS case team.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			representations. However, the link provided in the form did not take users to the Green Hill Solar Farm case. It instead directed them to a completely different application—the One Earth Solar Farm. This meant participants could not access the correct documents and could not complete the form accurately. I respectfully request that this error be acknowledged and corrected.	
MG-004	Hydrology, Flood Risk and Drainage	Flood History and Misrepresentation in Developer Submissions	Lavendon has a long and well-documented history of significant flood events. These occurred in: 1907, 1908, 1980, 2012, 2015, 2018, 2020 and 2024. These events have caused property damage, road closures, emergency responses, and significant disruption to residents. Despite this clear historical record, the Developer's documentation claims that no historical flooding has occurred at or near the site. This is incorrect. It contradicts: • Environment Agency records • Local authority flood reports • Buckinghamshire Fire & Rescue documentation • Parish Council evidence • Photographic and video records • Eyewitness accounts	The Applicant notes the concerns raised regarding flooding affecting Lavendon and the implication that the Scheme would inevitably worsen that flooding. The occurrence of flooding within the wider catchment does not demonstrate that the Scheme will increase flood risk elsewhere. The relevant policy test is whether the Scheme can be made safe for its lifetime and will not increase flood risk elsewhere, taking account of climate change. The Scheme-wide assessment and the parcel-specific assessments confirm this position in **ES Chapter 10 (Revision A) [REP1-023]** and the **Flood Risk Assessment and Drainage Strategy Report (Revision A) [REP1-053]**. The Applicant's approach is sequential. The most vulnerable elements are directed to the areas of lowest flood risk, and any limited interactions with mapped floodplain

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			In addition, Field G-13 lies partly within Flood Zone 3, yet no site-specific assessment and no Exception Test have been carried out. This omission is critical.	are assessed and managed through design and mitigation so that floodplain storage and flow routes are not adversely affected. Operational runoff effects are controlled through the drainage strategy, and construction-phase risks, including compaction and interaction with existing field drainage, are managed through the **Outline Construction Environmental Management Plan (OCEMP) (Revision A) [REP1-146]** and **Outline Soil Management Plan (OSMP) [APP-550]**. This is consistent with the positions already set out in the Applicant's Deadline 1 responses on the same underlying issues raised for Lavendon and the relevant development parcels **[REP2-050]**. The Applicant also refers to Appendix A within this document for the detailed response to Mark Shepherd.
MG-005	Hydrology, Flood Risk and Drainage	Hydrological Impacts of Solar Farms Not Adequately Assessed	Solar farms alter hydrological behaviour. Solar panels are impermeable structures, and rainfall is shed rapidly from the panel edges. This leads to: • increased peak flows, • higher runoff velocity, • greater erosion potential, and • an increased likelihood of downstream flooding.	The Applicant does not agree that the hydrological impacts of the Scheme have been inadequately assessed, or that the Scheme would create significant additional runoff that would worsen off-site flooding. The Scheme is supported by a completed Flood Risk Assessment and Drainage Strategy using best available information and methods agreed with the Environment Agency and Lead Local Flood Authorities for this type of NSIP scheme. The

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			There is extensive international research confirming these effects. Despite this, the Developer asserts that any change in runoff will be "negligible." This assertion is unsupported. No hydrological modelling has been presented. There are: • no NRCS Curve Number calculations, • no Rational Method assessments, • and no Wallingford Procedure analysis. For a development immediately upstream of a repeatedly flooded village, this lack of assessment is unacceptable.	assessment is reported in **ES Chapter 10 (Revision A) [REP1-023]** and the **Flood Risk Assessment and Drainage Strategy Report (Revision A) [REP1-053]**. Consistent with the Applicant's Deadline 1 responses, the evidence base and national policy position is that solar PV panels drain to the existing ground surface, and the principal credible risk mechanism for increased runoff is temporary construction-phase soil compaction rather than panel coverage. This is addressed through method controls and soil management commitments in the **OCEMP (Revision A) [REP1-146]** and **OSMP [APP-550]**. The "concentrated flow / kinetic energy" assertions and the soil depth arguments have already been addressed in detail in the Applicant's Deadline 1 responses, and those conclusions remain applicable. **[REP2-050]**.
MG-006	Ground Conditions and Contamination	Inaccurate Soil and Geology Baseline Conditions	The Developer relies entirely on desktop mapping for soil depth, geology, and infiltration assumptions. However, actual observed conditions at Green Hill G are substantially different: • Topsoil depth is 100–150 mm, not 300 mm • The underlying limestone is shallow • Infiltration capacity is significantly lower than assumed	The Applicant does not agree that the hydrological baseline used in the Applicant's assessments is incorrect on the basis asserted. The assessments do not rely "entirely" on desktop mapping for soil depth, geology or infiltration assumptions, and the flood risk conclusions are not contingent on a specific assumed topsoil depth or high infiltration capacity. The assessment is directed at whether the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• No site-specific infiltration tests were undertaken This means the hydrological baseline used in the Developer's assessments is incorrect.	Scheme would change runoff behaviour and increase flood risk, and concludes it will not. **[REP1-023]**; **[REP1-053]**. The Applicant agrees that soil condition and compaction can influence infiltration and runoff response. This is why construction-phase soil compaction is identified as the principal temporary runoff mechanism and is controlled through embedded mitigation and reinstatement secured in the **OCEMP (Revision A) [REP1-146]** and **OSMP (Revision A) [REP1-142]**. For the operational phase, solar arrays do not create continuous impermeable cover. Rainfall drains to the ground beneath and between arrays, and the drainage strategy controls runoff from any impermeable infrastructure areas. Accordingly, the points raised regarding topsoil depth, shallow limestone and infiltration capacity do not invalidate the assessment conclusions. **[REP1-023]**; **[REP1-053]**.
MG-007	Hydrology, Flood Risk and Drainage	Contradictions and Omissions Across Developer Documents	The Developer's documents contain several contradictions and omissions: • Flood zone boundaries differ across documents • Statements on historic flooding are inconsistent with known evidence • Areas of moderate to high risk on maps are described as low risk in text	The Applicant does not agree that the Application contains contradictions or omissions that undermine the flood risk conclusions. Where different mapping products are referenced (for example Flood Map for Planning, Risk of Flooding from Surface Water, and historic datasets), these are distinct Environment Agency

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Data availability is inconsistent • And importantly, no downstream flood impact assessment has been provided National Policy Statements and the NPPF require a demonstration that flood risk elsewhere will not be increased. This work has not been completed.	datasets with different purposes and scales. The Scheme's assessment uses the best available information and presents the completed assessment at DCO stage, rather than relying on scoping material. This is set out in **ES Chapter 10 (Revision A) [REP1-023]** and the **Flood Risk Assessment and Drainage Strategy Report (Revision A) [REP1-053]**. The Applicant's conclusions do not rely on claiming that flooding cannot occur in nearby communities. The conclusions are that the Scheme includes appropriate design, mitigation and construction controls such that it does not increase flood risk elsewhere. This is evidenced through the embedded runoff management measures, the drainage strategy, and the construction and reinstatement measures in the **OCEMP (Revision A) [REP1-146]** and **OSMP [APP-550]**. These points are consistent with the Applicant's Deadline 1 responses on the same themes. **[REP2-050]**.
MG-008	Hydrology, Flood Risk and Drainage	Required Work Is Incomplete	The Developer states that hydraulic modelling is "being undertaken," yet none of it has been submitted to this Examination. There is no: • exceedance flow modelling, • cumulative impact assessment, • modelling of flood depth or velocity,	Hydraulic modelling has been undertaken where it is required to characterise flood behaviour and demonstrate that the Scheme will not increase off-site risk. In particular:

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• or assessment of hazard or speed of onset. The application is therefore incomplete with respect to flood risk.	• BESS: fluvial flood risk has been assessed using a combination of Environment Agency model outputs for the key main river systems in the locality, supported by an additional direct rainfall model for the small tributary relevant to the BESS site. This is documented in the **Hydraulic Modelling Technical Note: BESS [REP2-052]** and reflected in **FRA/DS Annex J: Green Hill BESS [REP1-057]**. • Lavendon: a specific hydraulic modelling technical note has been prepared to assess the relevant local mechanisms and to demonstrate no off-site detriment to the village in operational conditions, reported in the **Hydraulic Modelling Technical Note: Lavendon [REP2-053]**. For the remainder of the Scheme, flood risk has been assessed proportionately using the Environment Agency Flood Map for Planning, the Environment Agency Risk of Flooding from Surface Water mapping, recorded flood data, topography, and standard open-channel methods for minor drains where appropriate, with the outcomes presented in **Environmental**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Statement Chapter 10 [APP-210] and the FRA/DS covering report and annexes **[APP-385]**. Exceedance principles are set out at Scheme level in **[APP-385]** (including maintaining flow paths and managing exceedance within the Order Limits), and construction-phase controls that govern the only credible temporary runoff increase mechanism (soil compaction and land drain disturbance) are set out in **[APP-545]** and **[APP-550]**. On that basis, the Applicant does not agree that the Application is missing a necessary modelling report, nor that the flood risk evidence base is incomplete.
MG-009	General Matters	Conclusion	In summary: • Lavendon has an extensive and well-evidenced flood history. • The site includes land within Flood Zone 3. • The hydrological impacts of the solar farm have not been adequately assessed. • Soil and geology assumptions are incorrect. • The Developer's documents contain contradictions and omissions. • Key national policy requirements have not been met.	The Applicant does not agree with the conclusion that the Scheme should be removed on flood risk grounds. Flood risk has been assessed from all sources and with climate change, and the Scheme's drainage strategy is designed to ensure the development is safe for its lifetime and does not increase flood risk elsewhere. This is demonstrated in **Environmental Statement Chapter 10 [REP1-023]**, the **Flood Risk Assessment and Drainage Strategy Covering Report [REP1-053]** and the supporting annexes (including **[APP-098]** and **[APP-108]**), with

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Required hydrological work remains incomplete. I respectfully submit that the proposed development, in its current form, cannot go ahead. G13 presents a real and ongoing risk of increased water runoff and downstream flooding affecting Lavendon and should be removed from the proposal.	additional modelling evidence provided where required in **[REP2-052]** and **[REP2-053]**. The Scheme also applies a sequential approach at both site selection and layout stages, directing the most vulnerable infrastructure to Flood Zone 1 and limiting floodplain interaction. Construction risks are controlled through secured measures in the OCEMP **[REP1-131]** and OSMP **[APP-550]**, and the BESS drainage and pollution controls are set out in **[REP1-143]**. Accordingly, the Applicant maintains that the Scheme meets the relevant national policy tests for flood risk and drainage and should not be removed on the basis asserted.
MG-010	General Matters	Written Representation (page 30-31)	Written Representation presented that is substantively similar to summary of oral representation.	The Applicant has addressed these comments in 'MG-003' to 'MG-009' above.

2.15 Peggy M Butler

Table 2.15: [REP3-119]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PMB-001	Socio-economics, Tourism and Recreation Human Health	Amenity	I am deeply unhappy about the proposed Green Hill solar farm in Lavendon. Having lived here for over thirty years I have regularly walked the Three Shires Way, enjoying the landscape and wildlife, the changing seasons with the arable crops, the views.	The Applicant has assessed the likely impacts on PROWs and recreational routes including the Three Shires Way at **ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [REP1-079]**. For construction effects, the assessment finds a residual **significant adverse effect** to the Three Shires Way as a result of its regional importance, however there are no residual significant adverse effect to individual PROWs during construction, or to any recreational routes during the Scheme's operation. The Applicant has also assessed the impact of the Scheme on physical and mental health and wellbeing within communities in **ES Chapter 18: Human Health [APP-055]**. In direct consideration of rurality and people's association with where they live is the assessment of '*community identity, culture, resilience and influence*', which considers how the Scheme impact on community wellbeing, sense of place, and the extent to which residents feel they can shape their physical surroundings. The assessment considers that the Scheme is anticipated to have no greater than a long-term, but temporary,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				minor adverse effect (during construction and in the 5-10 years that follow) – which is not significant.
PMB-002	Hydrology, Flood Risk and Drainage	Surface water flooding	I am very concerned about the flooding risk with the likely funnelling of water from the panels into the ditches and brooks and so into the village.	The Applicant notes the concern, but does not agree that the Scheme will "funnel" water to receiving ditches and brooks in a way that increases flood risk to villages. Operationally, the solar arrays remain permeable with rainfall draining to the existing ground. The Scheme does not introduce continuous impermeable coverage across the fields. Where new hardstanding is required (for example, substations and BESS), runoff is managed via SuDS and flow control so that discharge is restricted to greenfield equivalent rates and exceedance is managed within the Order Limits. This approach is set out in the **Flood Risk Assessment and Drainage Strategy Covering Report [REP1-053]** and the relevant annexes. The main credible pathway for increased runoff risk is during construction, through temporary compaction and disturbance of existing agricultural land drainage. These risks are controlled through commitments in the **Outline Construction Environmental Management Plan [REP1-131]** and **Outline Soil Management Plan [APP-550]**, including

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				protecting and reinstating land drains and managing working methods to avoid uncontrolled runoff. The Scheme is therefore designed to avoid increased runoff being conveyed off site and to avoid increased flood risk to downstream receptors.

2.16 Peter Butler

Table 2.166: [REP3-120]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PrB-001	Principle of Development	Objection to Scheme in Principle	I moved to a quiet part of the countryside and I don't want it to change, particularly because it will be environmentally deliterious to future generations.	The Applicant notes this comment.

2.17 Phil Mason

Table 2.177: [REP3-121]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PM-001	Transport and Access	Station Road (Grendon)	I attended the OFH2 hearing this morning and on the way back encountered an accident between the Earls Barton bridges (White Mills Marina) and the Quarry. Photo below: [see original representation] This is not uncommon and is typical of occurrences on these bends, particularly where larger vehicles are involved. It is a very tight bend and blind until you are on top of the bend. This obviously a concern with the anticipated HGV's taking batteries etc to the BESS site. Thank you for your attention in this matter.	This route is currently used by HGVs accessing the nearby aggregates works and is demonstrably accommodating such vehicles. The accident history of this section has been considered within the **Environmental Statement Chapter 13 - Transport and Access (Revision A) [REP2-003]** which does not identify a significant accident history in this location. Swept path analysis suggests that HGVs and cars can pass in this area and there is sufficient visibility and waiting areas to allow two HGVs to pass should this occur.

2.18 Richard Gregory

Table 2.188: [REP3-123]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
RG-001	Hydrology, Flood Risk and Drainage	Flooding in Lavendon	Hydraulic Modelling Technical Note. Lavendon Flood Alleviation Study. 19 / 10 / 2025. The report states that based on the modelling undertaken it is concluded that the proposed solar farm development cannot feasibly incorporate on site measures within Area G that would provide a measurable reduction in flood risk to Lavendon. Modelling was used to simulate a range of future rainfall events. A middle range was chosen based on a 3.3% AEP with a return period of 30 years and a climate change uplift of 25%.[ref page 12.] In the results summary , page [17 item 2.6.4.] the model confirms that the maximum flood depth would reach 700mm at a property North of the A428 { assume Lower Farm }. A model using a more severe 0.1% AEP and a CC of 40% has not been included.We question why. A report produced for MKCC in August 2025 by AECOM researched the storm event which occurred directly over Milton Keynes between September 22nd to 29th / 2024. Out of 6 flood hot spots recorded, Lavendon had the most severe rainfall. "This was so intense that the ground became saturated very quickly resulting in a high level of surface water run-off and fluvial flooding." The storm peaked on Sept 22nd and was classified as >0.1% AEP with a return period exceeding 1000	The hydraulic modelling for Lavendon was undertaken to understand flood mechanisms and to test whether measures within Green Hill G could provide a measurable reduction in flood risk within Lavendon. The modelling note confirms that a range of rainfall events were simulated, including up to the 0.1% AEP, with climate change uplifts applied in line with the EA 2070s central and upper end allowances. Options testing was anchored to the 3.3% AEP +25% climate change event as a representative scenario to enable like for like comparison of mitigation performance. **[REP2-053]** The modelling shows that flooding in Lavendon is driven by multiple converging flowpaths across a wider catchment, with several contributing routes originating outside Green Hill G. The options tested within Green Hill G resulted in only minor, localised reductions in flood depth and did not materially change flood extents or the number of affected properties within Lavendon. Further diagnostic testing confirms that significant flooding persists even where individual flow routes are fully contained, due to contributions from other

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			yrs. This report was available before the Arthian study was undertaken.	parts of the catchment and rainfall falling directly within the village. **[REP2-053]** More severe events increase flood extents and depths, but do not alter this conclusion regarding the limited influence of measures confined to Green Hill G on village scale flooding. The Applicant's assessment of whether the Scheme would worsen flood risk to Lavendon is addressed through ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** and the Flood Risk Assessment and Drainage Strategy suite **[APP-098 to APP-102, APP104 to APP107, REP1-053, REP1-055, REP1-057]**, which conclude that the Scheme will not increase flood risk to third parties, including Lavendon, with post-development runoff controlled to greenfield or better and construction-phase risks managed through embedded mitigation.
RG-002	Hydrology, Flood Risk and Drainage	Flooding in Lavendon at Lower Farm	The attached photo shot was taken of the access bridge to the Lower Farm property. [see page 34 of original representation] This shows a timber post upon which has been marked, in white the height of the storm water flood passing under at 11.00pm on the 22nd Sept 2024. This measures 1,65m from the limestone channel bed. Below is the 700mm line indicating the maximum height modelled at 3.3% AEP. Below that are the small reduction markers of levels if earth bunding is introduced. The 1.6 m depth is equivalent to > 0.1% AEP. The drainage	This point is addressed in the response to **RG-003** and is not repeated here. The Lavendon modelling note records the modelled depths at the property north of the A428 for the 3.3% AEP +25% climate change event and the limited localised reductions achievable under the options tested, and also confirms that events up to the 0.1% AEP were simulated. The photograph of the September 2024 flood mark does not change the modelling conclusions on flood mechanisms or the limited influence of

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			channel flows 1km down to Lavendon and passes under the A428 via a concrete culvert. This could not cope with the force of the flood water and over spilled into adjoining properties and the village.	measures confined to Green Hill G on flooding in Lavendon. **[REP2-053]**
RG-003	Hydrology, Flood Risk and Drainage	Commissioned hydrology report	A report by a consultant Hydrologist Mark Shepherd is attached which researches the fact that the solar panel installation in Site G will increase the rate of surface storm water run-off into the large drainage channel and breach the flood defences in Lavendon Village the Lower Farm properties and Equestrian Livery business. As GHS cannot propose any further flood defence options for Site G it should be withdrawn from the development.	This report is responded to in **Table 2.13** and Appendix A. The Applicant notes the submission and the attached report by Mark Shepherd. The Applicant does not agree that the Scheme would increase surface water runoff in a manner that would breach flood defences or increase flood risk in Lavendon, Lower Farm or other off-site receptors. The Scheme-specific assessment for Green Hill G is set out in the Flood Risk Assessment and Drainage Strategy Annex I **[APP-107]**, supported by ES Chapter 10 **[REP1-023]** and the FRA/DS Report **[REP1-053]**, and concludes no increase in runoff leaving the parcel and no increase in flood risk beyond the Order Limits. The Applicant has also provided Lavendon-specific hydraulic modelling and options testing in the Hydraulic Modelling Technical Note: Lavendon Flood Alleviation Study **[REP2-053]**, which supports the conclusion that Scheme flows do not drive flooding outcomes through the village and that measures confined to the Order Limits would provide minimal betterment.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Applicant notes the suggestion that further flood defences should be proposed. The Scheme is not required to provide off-site flood alleviation or betterment. The relevant policy test is that the Scheme is safe for its lifetime and does not increase flood risk elsewhere, and the submitted evidence demonstrates that test is met. On that basis, the Applicant does not agree that Green Hill G should be withdrawn from the Scheme.

2.19 Sarah Bool MP

Table 2.19: [REP3-124]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SBMP-001	Principle of Development	General points of objection	I have always said that I am not anti-Renewables (as we need a diverse energy mix) however the placement and nature of the applications must be carefully considered. Any development must be carried out in a prudent and responsible way, in-line with the interests of locals, government policy and national food security. It is clear that this scheme falls short on all of these accounts and leaves some glaring open questions.	The Applicant notes this comment.
SBMP-002	Alternatives and Design Evolution Agriculture and Soils	Use of agricultural land and BMV	The Green Hill site sits on mainly high-grade agricultural land, with 65% of it being Best and Most Versatile Land (BMV) Grades 1, 2 and 3a. This clearly contradicts National Policy Statement for Renewable Energy Infrastructure (EN-3) which outlines the avoidance of the use of BMV land. Over 850ha of BMV land will be used as part of the proposed development. The scheme is also wasteful in its use of agricultural land and uses over 40% more land than the comparable Sunnica 500MW scheme. The reasons for this remain unanswered.	The Proposed Development does not result in the loss or downgrading of agricultural land, except for the modest areas described in the **ES Chapter 20: Agricultural Circumstances [APP-057]** and the **Farming Report [APP-571].** The policy implications of land use are discussed in **ES Chapter 20: Agricultural Circumstances [APP-057]** and the Farming Report. There is no food security concern and no policy to require agricultural land to be used for food production. The development is not contrary to policy, as examined in those documents. It is acknowledged that following completion of decommissioning

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				operations, all land of the Sites would be reinstated and returned to the landholders to continue in agricultural use. All infrastructure will be removed to ensure there are no obstructions to cultivation. As outlined in **ES Chapter 20: Agricultural Circumstances [APP-057]** 'As the agricultural land would be restored to previous conditions after mitigation measures, the effect on agricultural land would be Neutral. However, due to the potential increase of topsoil organic matter, there may be an increase in ALC grades for some land and this would result in a beneficial effect, which is Not Significant'. The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range, as is described in Section 4.2 of the **ES Chapter 4 Scheme Description [REP1-031]**. This demonstrates that the proposed locations for the Scheme are suitable sites which can accommodate an asset which is consistent with government's view of best practice ratios of land take and installed capacity. Furthermore, paragraph 7.7.1 **Statement of Need [APP-556]** states that NPS EN-3 indicates that along with associated infrastructure, a solar farm typically

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				requires between 2 to 4 acres for each MW output. NPS EN-3 states in paragraph 2.10.17 that this range will vary significantly depending on the site, with some being larger and some being smaller. Therefore this range does not act as a maximum size of site. Please refer to the responses to SGHS-001,SGHS-002 and SGHS-004 in regard to the site selection approach and consideration toward use of BMV land.
SBMP-003	BESS Air Quality	BESS Fire	Professor Peter Dobson, Emeritus Professor of Oxford University has effectively outlined in his submissions many of my fears over the proposed Battery Energy Storage Systems in this scheme. His concerns over lithium-ion batteries and their risk of "thermal runaway" should be taken very seriously. The BESS proposed is very close to residents in the village of Grendon. In the event of a battery fire residents will be at risk from toxic fumes. Given the lack of details regarding the chemical composition of these specific batteries, little is known regarding the nature of the particulates in potential fumes. Prevailing winds have the potential to disperse these to large population centres such as Wellingborough.	The Applicant's Plume Study **BESS Fire Emissions Modelling Report [APP-167]** models all emissions and impacts from a BESS fire that are specified through NFCC guidance and from the Applicant's previous DCO consultations with the UK Health and Security Agency (UKHSA). The modelling uses five years of local meteorological data. The highest predicted concentrations from all meteorological scenarios for each receptor are reported, ensuring that the results reflect the worst-case conditions. The Applicant's Plume study has already demonstrated that there will be no significant off-site BESS fire impacts on sensitive receptors. The rapid dispersion of toxic gases in outdoor BESS fires

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				limits the potential for off-site toxic exposure. Air sampling from previous BESS fire incidents has found that off-site contaminant concentrations did not pose a public health risk. Recent Large Scale Fire Test (LSFT) BESS research and real-world incident experience indicates that emissions in the smoke from a BESS fire in an outdoor setting are comparable to those of a residential / commercial structure fire. Because a BESS fire would involve a modular non-combustible enclosure tested to prevent propagation, any emissions or other substances generated by a fire will be less than those produced by a fire involving most commercial or industrial building structures. As stipulated in the Applicant's Outline Battery Storage Safety Management Plan (OBSSMP) [REP1-143], the Plume study of the selected BESS system commissioned at the detailed design stage will be conducted at approved third-party or government approved test laboratories. These facilities utilise large scale smoke hoods (cone calorimeters) able to capture every type of battery gas &

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				particle emitted during the thermal runaway process at module, battery rack or complete BESS enclosure level. This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO2), Hydrogen (H2), Sulphur Dioxide (SO2), Nitrogen Oxides (NOx), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), PAHs, etc. The equipment also integrates comprehensive particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. This means that heavy metal particulate emissions can be quantified and included in emission modelling if the selected battery system emits significant levels during fire testing. Section 5.5.9 of the OBSSMP stipulates: "*..at the detailed design stage a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. *The emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."* This is secured through the DCO by Requirement 6 of Schedule 2 [REP3-024].
SBMP-004	Hydrology, Flood Risk and Drainage	Flood Risk and Cumulative Effects	Flooding in relation to the BESS is also worrying. The area was flooded when I visited in Autumn 2024 and is seeing more regular flood events. It's positioning next to the SSSI area is additionally alarming. The application has also failed to consider the cumulative impact of BESS in the Grendon area, with a 49.9 MW facility that went live two years ago and a further 49.9 MW	The assessment of cumulative effects is outlined in **ES Chapter 25: Cumulative Effects and Effect Interactions [APP-062]**. The BESS at Grendon has been identified under cumulative development ID 8. Cumulative effects have been assessed in each individual topic chapter and, for each topic where cumulative

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			BESS facility that has received planning consent. BESS totalling nearly 600 MW so close to the village setting, the Nene waterways and in a flood zone is inappropriate and disproportionate.	effects are possible with another development, this assessment is documented in a matrix (see Table 25.6 of **ES Chapter 25: Cumulative Effects and Effect Interactions [APP-062]**). The Applicant notes the concerns raised regarding flood risk and drainage at the BESS, potential impacts to sensitive receptors, and cumulative BESS development in the wider area. The BESS site is shown on Environment Agency Flood Map for Planning mapping as having interaction with Flood Zones 2 and 3 within parts of the BESS land. This is exactly why the Applicant has undertaken site-specific hydraulic assessment and modelling to characterise flood behaviour and inform the layout and mitigation. The modelling evidence is reported in the **Hydraulic Modelling Technical Note: BESS [REP2-052]** and the BESS-specific flood risk assessment in **FRA/DS Annex J: Green Hill BESS (Revision A) [REP1-057]**. This work draws on Environment Agency hydraulic models for the Middle Nene and Grendon Brook, supplemented by a 2D direct rainfall model for the ordinary watercourse (Field Drain) that influences parts of the BESS area. **[REP2-052]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The results confirm that the flood risk to the proposed BESS compound is low and can be appropriately managed through the design. In particular, the modelling indicates no fluvial flooding of the BESS compound from the Field Drain in the design scenario, with only localised ponding shown within the wider site boundary, which is disconnected from the watercourse and will be managed by the proposed site drainage. On that basis, the BESS compound and its acoustic bund can be considered to lie within Flood Zone 1 for fluvial risk purposes, and at very low risk of fluvial flooding. **[REP1-057]**. In respect of environmental protection, the BESS drainage strategy includes containment and isolation measures to prevent polluted runoff entering receiving waters in incident scenarios, supported by the **Outline Battery Storage Safety Management Plan (Revision A) [REP1-143]** and the drainage and flood risk controls set out in **[REP1-057]**. For cumulative effects, the relevant flood risk test remains whether the Proposed Development would increase flood risk elsewhere. The BESS drainage and mitigation measures are designed to ensure no increase in off-site flood risk

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				from the Proposed Development, irrespective of other schemes in the wider area, as set out in **ES Chapter 10 (Revision A) [REP1-023]** and the **FRA/DS Report (Revision A) [REP1-053]**, supported by **[REP1-057]** and **[REP2-052]**.
SBMP-005	General Matters	Community Benefits	The DCO lacks any mention of community benefits - there is no good or justifiable reason for its omission. As part of the pre-application presentations by the applicant, many residents have reported to me that fund for local projects and Parish Councils was promised but it is suspicious that this is not part of the DCO. There are additional and warranted fears that if the site were sold, any community benefits would not be guaranteed.	Please refer to the Applicant's response to 'NNC-085' for details relating to community benefits in the **Applicant Responses to Relevant Representations document [REP1-161]** and response to NNC-002 of the Applicant's Comments on Responses to ExA Second Written Questions **[EX4/GH8.1.27]** The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations.
SBMP-006	Alternatives and Design Evolution	Site Selection and Land Requirement	This scheme is formed of 9 different and separate sites - there is no good reason for its disparate nature. EN-3 paragraph 2.10.25 calls on applicants to choose sites	Please refer to the responses SGHS-001 and SGHS-002 in The Applicant's Responses to Written Representations at Deadline 1 [REP2-048] and SGHS-001

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			"based on nearby available grid export capacity". The need for 31km of cabling shows that this is not the case in this application. The distant sites cannot reasonably be described as near to Grendon substation. As outlined by Chartered Town Planner Alyn Nicholls in its submissions, this approach means that insufficient consideration has been given to ecological and biodiversity concerns, the potential for flooding, the use of BMV land and the impact of heritage assets.	to SGHS-003 in the GH8.1.29 Applicants Response to Stop Green Hill Solar at Deadline 4 regard to the site selection process and justification for the size of the scheme. As suggested the Scheme consists of a number of Sites which together are the Scheme. There are benefits of this approach, with large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SBMP-007	Draft DCO	Consent Time Period	EN-3 paragraph 2.10.65 says "An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation." The time-period for this DCO being at 60 years is wholly unjustified. The National Policy Statement makes it clear what is typical and there does not seem to be a reason from the applicant on the reasons behind an application for 50% longer. Will the applicant explain why it is so essential and justify?	In relation to the length of time of the operational lifetime, please refer to the Applicant's response to comment 'SBMP-005' in **The Applicant's Response to Relevant Representations [REP1-161].**
SBMP-008	Alternatives and Design Evolution	PV Panel Specification	The final design of the solar panels is not defined in the DCO. Initial presentations by the applicant showed low-level panels but previous developments designed by Lanpro, who I am led to believe is the proposed designer for Green Hill Solar, have had panels as high as 4.5m. The only information available on this front is that it will comprise of either 3.5m high panels fixed east to west, or 4.5m rotating panels or a combination of both. The fact that this design is not part of the consideration given the impact it will have, avoids the necessary scrutiny of the scheme.	The Concept Design Parameters and Principles document [REP1-151] sets out the design parameters and principles by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. It will be secured by a Requirement in Schedule 2 to the draft DCO [REP3-024] in order to prescribe the guiding design principles and parameters to inform the detailed design of the Scheme post DCO consent. To maintain flexibility in the design, the Applicant has assessed the impacts of the Proposed Development within the maximum parameters set out in the Concept Design Parameters and Principles document. The ES adopts a maximum design scenario approach,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				assessing the Scheme on the basis of the maximum project design parameters relevant to the technical discipline i.e. the reasonable worst-case scenario for impacts (known as the "Rochdale Envelope"). The Application has incorporated flexibility into the design of the Scheme to allow the latest technology to be installed at the time of construction. The ES considers the use of fixed and tracker panels for the Solar Arrays. The need for flexibility in design, layout and technology is recognised in National Policy Statement EN-1 as elements of a development may not be finalised. Further detail about the 'Rochdale Envelope' approach can be found in the Planning Inspectorate Advice Note Nine. By assessing the maximum (and where relevant, the minimum) parameters for the Scheme where flexibility needs to be retained, the ES ensures that all potentially significant effects (positive or adverse) are considered. The principles and justification for this approach are set out in Chapter 2: EIA Process and Methodology [APP-039] of this ES. Within the ES the worst case scenario has been assessed, for example, the tracker panels have been assessed in

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Chapter 8: Landscape and Visual [APP-045] as a worst-case scenario given their larger scale and Chapter 15: Glint and Glare [APP-052] considers both fixed and tracker panel options as either type of panel may constitute the worst case scenario.
SBMP-009	General Matters	DCO Process	I also wish to highlight concerns over the time period, deadlines for the examination period and process. Whilst I understand that there may be reasons not to use a full 6-month examination period, it does impact the deadlines that parties have to work to. Whilst it is an improvement that Deadline 4 has been pushed back to 14th January 2026, the Christmas and the New Year period does remove a significant proportion of time from the ability to draft responses and particularly impacts local groups who are working on this alongside work and family commitments.	The Applicant notes this comment.

2.20 Shena Howell

Table 2.190: [REP3-125]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SH-001	Transport and Access	Station Road (Grendon)	Further to ISH1 and ISH2, I feel it is imperative that you try to make time to visit (or simply pass over) the bridge adjacent to White Mills Marina on Station Road. This single track bridge floods regularly (6 times last year!) has right angle bends and is the point of access for emergency vehicles and nominated in the transport plan for HGV access for BESS. Furthermore, you will be passing extremely close by on Thursday. Please give my request serious thought with immediate attention	This route is currently used by HGVs accessing the nearby aggregates works and is demonstrably accommodating such vehicles. The mechanism for dealing with short-term closures associated with flooding is set out in the **Outline Construction Traffic Management Plan Revision B [REP3-064]**

References

Ref 1.1 Pager Power (2022) Solar Photovoltaic Glint and Glare Guidance: Fourth Edition. Sudbury: Pager Power Ltd. Available at: https://www.pagerpower.com/wp-content/uploads/2022/09/Solar-Photovoltaic-Glint-and-Glare-Guidance-Fourth-Edition.pdf

Appendix A – Technical Response to Mark Shepherd

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TECHNICAL RESPONSE TO HYDROLOGY, FLOOD RISK AND DRAINAGE MATTERS RAISED - Green Hill Solar Farm (EN010170), Site G (Green Hill G, Lavendon)

This document provides the Applicant's technical response to hydrology, flood risk and drainage matters raised by Mark Shepherd in his written submission for Deadline 3 [REP3-117].

The Applicant provides this response to assist the Examining Authority and statutory consultees by addressing the substantive points raised and signposting to the submitted evidence base. The Applicant's assessment is directed at the core policy test that the Scheme is safe for its lifetime and will not increase flood risk elsewhere. The Applicant's conclusion for Green Hill G remains that the Scheme will not increase flood risk within or beyond the Order Limits, including at Lavendon.

The Applicant's flood risk and drainage evidence base for Green Hill G is set out in Environmental Statement Chapter 10: Hydrology, Flood Risk and Drainage (Revision A) [REP1-023] and the site-level assessment in Flood Risk Assessment and Drainage Strategy Annex I: Green Hill G [APP-107], supported by Flood Risk Assessment and Drainage Strategy Report [REP1-053]. The Applicant has also provided detailed topic responses at Deadline 2, including SGHS-001 to SGHS-013 and KGRG-012 to KGRG-014 within Applicant Responses to Deadline 1 Submissions [REP2-050].

In addition, the Applicant undertook dedicated hydraulic modelling and options testing to understand flooding mechanisms affecting Lavendon and to test whether measures located within Green Hill G could provide material betterment. This work is presented in Hydraulic Modelling Technical Note: Lavendon Flood Alleviation Study [REP2-053]. This modelling supports the Applicant's conclusion that the Scheme will not increase flood risk in Lavendon and demonstrates that flooding through the village is driven by multiple catchment-wide flowpaths.

Applicant's position on the overall submission

The Interested Party's submission asserts that the Applicant has not taken statutory and engineering assessment into consideration in sufficient detail to draw conclusions for Site G.

The Applicant's position is that the submitted Site-level Flood Risk Assessment (FRA) and ES assessment for Green Hill G is proportionate and robust, uses appropriate datasets and methods, and is strengthened by the additional Lavendon-specific hydraulic modelling and options testing. The Applicant remains satisfied the Scheme will not increase flood risk beyond the Order Limits, including at Lavendon. [APP-107]; [REP1-023]; [REP2-053].

Flood history, EA datasets, and the "factually incorrect" point

The Interested Party challenges statements in ES Chapter 10 relating to historic flooding and presents evidence of flooding in and around Lavendon.

The Applicant does not dispute that Lavendon has experienced flooding. The assessment question for the DCO is whether the Scheme changes runoff generation or routing such that flood risk would increase beyond the Order Limits. The Green Hill G parcel assessment concludes it does not, and therefore concludes there is no increase in flood risk as a result of the Scheme. [APP-107]; [REP1-023].

Where previous wording in ES Chapter 10 has been interpreted as implying that Lavendon has not flooded, the Applicant clarifies that the point being made is dataset specific. Specifically: the EA Historic Flood Map is a dataset of recorded flood extents, and it does not identify recorded historic flooding at Green Hill G. The Applicant also recognises, from other sources, that flooding has occurred in Lavendon, and the absence of recorded flooding in that dataset does not affect the assessment. This does not preclude flooding in Lavendon from other mechanisms and contributing areas, nor does it imply that flooding has not occurred elsewhere within the wider catchment. The Applicant's scheme-effect conclusion is unchanged. [APP-107]; [REP1-023].

Critical Drainage Catchment (CDC2) and NPS EN-1 policy triggers

The Interested Party states that Lavendon has been identified as a Critical Drainage Catchment (CDC2) and argues this means paragraph 5.8.13 of NPS EN-1 has not been adequately addressed.

The Applicant agrees that where land has been identified as having critical drainage problems, an assessment is required even where the majority of the Scheme is in Flood Zone 1. The Applicant has undertaken that assessment for Green Hill G and presented it within the ES and FRA suite. [REP1-023]; [APP-107]; [REP1-053].

CDC designation is an identification of existing sensitivity and flood risk mechanisms during severe rainfall events. It does not, of itself, demonstrate that a particular development will increase flood risk. The Applicant's assessment addresses the relevant policy test by considering drainage and runoff mechanisms for Green Hill G and concluding that the Scheme will not increase flood risk beyond the Order Limits, including at Lavendon. [APP-107]; [REP1-023].

The Applicant has strengthened that position further through the Lavendon hydraulic modelling and diagnostic tests, which specifically examine catchment mechanisms and test whether containment or mitigation measures confined to Green Hill G could materially change flooding outcomes in Lavendon. The modelling demonstrates that flooding through Lavendon is driven by multiple contributing flowpaths across the wider catchment and persists in diagnostic tests even when flows associated with Green Hill G are fully contained. This supports the conclusion that the Scheme will not increase flood risk in Lavendon. [REP2-053].

"Best available evidence", Flood Estimation Handbook (FEH), Section 19 investigations, and local records

The Interested Party states that national datasets should be refined using local evidence and requests that local rainfall, photographs, flood marks and Section 19 investigation outputs be incorporated to "recalibrate" modelling.

The Applicant agrees that best available evidence should be used. The technical distinction is how evidence types are used within an FRA.

- Local records, photographs, Section 19 investigations and community evidence are valuable for describing flood history, identifying flood mechanisms, and corroborating or sense-checking flow paths and constraints.
- These local evidence sources do not replace FEH design rainfall, standard hydrological parameterisation, and appropriate hydraulic modelling used to define design events and test scheme effects for drainage and flood risk assessment.

This is the basis of the Applicant's established position in SGHS-006 within [REP2-050].

The Applicant notes that the Interested Party's local evidence and cited investigations describe severe rainfall and exceedance of drainage capacity within Lavendon. This is consistent with the Applicant's understanding that village flooding is driven by multiple interacting mechanisms across the catchment, which is explicitly tested through the Lavendon modelling and options work. The Applicant's modelling work is scheme-relevant and addresses the applicable planning question, namely whether the Scheme would increase flood risk in Lavendon and whether measures within Green Hill G could deliver material betterment. [REP2-053].

Requested responses to external reports and committee papers

The Interested Party lists multiple external reports and committee papers and requests that the Applicant respond to each document individually.

The Applicant notes these documents as background context describing flood history, impacts and flood risk management activity in and around Lavendon. They do not, however, demonstrate that the Scheme increases flood risk.

The Applicant's position is evidence-led and scheme-specific. The relevant question is not whether Lavendon has flooded, nor whether wider strategic reports identify Lavendon as sensitive, but whether the Scheme changes runoff and flow routing such that flood risk would increase beyond the Order Limits. That question is addressed through the Site-level assessment and, specifically for Lavendon, through additional hydraulic modelling and diagnostic tests. [APP-107]; [REP1-023]; [REP2-053].

Surface water flow paths and "bigger picture" assessment

The Interested Party refers to mapped surface water flow paths in Lavendon and argues the Applicant has relied on a "bigger picture" and therefore avoided responsibility for local detail.

The Applicant's assessment for Green Hill G is not a "bigger picture" screening exercise. It is a Site-level assessment within the FRA suite, supported by ES Chapter 10, and it explicitly considers local drainage

features, overland flow routing, and interaction with Flood Zones where present at the parcel margins. [APP-107]; [REP1-023].

The Applicant's approach reflects the fact that surface water flood risk is highly dependent on local routing and the capacity of ordinary watercourses, drains and highway drainage. This is why construction-phase risk (soil compaction, trafficking, disturbance to existing drains) is identified as the principal plausible temporary mechanism for increased runoff and is controlled through embedded mitigation, including drainage feature protection, managed trafficking, temporary drainage controls, and reinstatement. These measures are secured through the Outline Construction Environmental Management Plan (OCEMP) [REP1-131] and Outline Soil Management Plan (OSMP) [APP-550], alongside the Site-level requirements within the FRA suite. [APP-107]; [REP1-053].

For the operational phase, the Scheme retains permeable, vegetated groundcover beneath and between arrays (improved grassland) and does not introduce widespread permanent impermeable surfacing across the parcel. Runoff continues to drain to the ground, rather than being collected and discharged via a piped outfall. On that basis, the assessment concludes no increase in runoff rates or volumes leaving Green Hill G and no increase in flood risk beyond the Order Limits, including at Lavendon. [APP-107]; [REP1-023].

Soil depth, geology, compaction, and the operational runoff mechanism

The Interested Party challenges the representativeness of geological mapping and asserts that shallow soil depth could increase runoff and invalidate conclusions.

The Applicant agrees that soil condition and compaction can influence infiltration and runoff response. This is precisely why construction-phase soil compaction is identified as the principal temporary runoff mechanism. This is controlled through embedded mitigation and reinstatement to restore soil structure and infiltration capacity to current levels. [REP1-131]; [APP-550].

For the operational phase, the assessment is directed at the realistic hydrological mechanism for a solar PV scheme on grassland. The Scheme does not convert the parcel into continuous impermeable cover. Rainfall drains to ground beneath and between arrays and the post-development condition remains permeable and vegetated. Consequently, localised baseline variability in topsoil thickness does not change the scheme-effect conclusion, because the Scheme is not reliant on the creation of hardstanding drainage networks that would materially alter catchment response. The Site-level assessment concludes that the Scheme will not increase runoff leaving Green Hill G and will not increase flood risk beyond the Order Limits, including at Lavendon. [APP-107].

Research evidence, runoff concentration, and the Cook and McCuen point

The Interested Party cites research papers and alleges the Applicant has "cherry-picked" conclusions, including the point that runoff from panel edges may have higher kinetic energy and could cause erosion where bare ground exists.

The Applicant agrees that localised erosion can occur where concentrated flows discharge onto bare soil or poorly vegetated ground, particularly along drip lines, maintenance routes, or where vegetation management is not maintained. This is not a basis to conclude that a solar farm on managed grassland necessarily increases catchment runoff and downstream flood risk.

The Applicant's assessment and mitigation assumptions are based on maintaining grass cover beneath and between arrays, managing trafficked areas, and avoiding creation of extensive bare ground strips. Where localised scour potential exists, it is addressed through groundcover specification, maintenance, and construction controls to prevent bare ground and restore vegetation promptly. These controls align with the embedded mitigation approach set out in the OCEMP and OSMP. [REP1-131]; [APP-550].

In policy terms, NPS EN-3 is clear that solar PV panels drain to the existing ground and that, where an FRA has been carried out and drainage considered, the impact will not, in general, be significant. That is not a blanket exemption. It is technology-specific context that supports the Applicant's operational drainage mechanism, namely that panelled areas remain vegetated and permeable and rainfall drains to the ground beneath and between arrays rather than being converted into continuous impermeable runoff. [NPS EN-3, paragraph 2.10.84].

Flood Zone 2 and 3 interaction and sequential approach at parcel scale

The Interested Party asserts that the Applicant must address Flood Zone 3 even where limited in extent.

The Green Hill G parcel assessment considers Flood Zone interaction at the appropriate scale and confirms Green Hill G is predominantly Flood Zone 1 with only limited peripheral interaction with Flood Zones 2 and 3 associated with local watercourses and land drainage features. The Scheme does not introduce built development into those peripheral areas and does not increase flood levels, displace floodplain storage, or increase flood risk elsewhere. [APP-107]; [REP1-023].

Lavendon schools and "danger to life" framing

The Interested Party references vulnerable receptors in Lavendon (including the nursery and primary school) and expresses concern about the potential for a flash flood being triggered or exacerbated by the Scheme.

The Applicant recognises the seriousness of flooding impacts and the need for confidence that the Scheme will not worsen risk. The Applicant's conclusion is that the Scheme will not increase flood risk in Lavendon, including to vulnerable receptors, because it does not introduce a mechanism that would increase runoff rates or volumes leaving Green Hill G, and because catchment-based modelling demonstrates that flooding through Lavendon is driven by multiple interacting flowpaths across the wider catchment and persists even when flows associated with Green Hill G are fully contained. [APP-107]; [REP2-053].

Lavendon modelling findings and the EN-1 versus EN-3 interpretation question

The Interested Party asks whether paragraph 3.10.75 of NPS EN-3 "supersedes" NPS EN-1 paragraph 5.8.13. The Applicant assumes the Interested Party is referring to paragraph 2.10.75 of NPS EN-3. This paragraph cross-refers to section 5.8 (Flood Risk) of NPS EN-1.

NPS EN-1 and NPS EN-3 are to be read together. NPS EN-1 sets the overarching flood risk policy tests for energy NSIPs, including that the Scheme must be safe for its lifetime and must not increase flood risk elsewhere. NPS EN-3 does not remove or replace those tests. It provides additional, technology-specific context for solar PV which informs the likely flood mechanism and magnitude of effect.

In particular, paragraph 2.10.84 of NPS EN-3 confirms that where a Flood Risk Assessment has been carried out it must be submitted alongside the Environmental Statement and must consider the impact of drainage,

and that because solar PV panels drain to the existing ground the impact will not, in general, be significant. This policy context supports the Applicant's assessment approach for operational drainage, namely that panelled areas remain vegetated and permeable and rainfall drains to the ground beneath and between arrays, rather than being converted into continuous impermeable area which would exacerbate runoff. [NPS EN-1]; [NPS EN-3].

Conclusions

The Applicant recognises Lavendon's flood history and the Interested Party's local evidence. The Applicant's assessment is directed at whether the Scheme is safe for its lifetime and does not increase flood risk elsewhere.

The Site-level assessment for Green Hill G concludes that the Scheme will not increase flood risk within or beyond the Order Limits, including at Lavendon. This is set out in Flood Risk Assessment and Drainage Strategy Annex I: Green Hill G [APP-107] and summarised in Environmental Statement Chapter 10: Hydrology, Flood Risk and Drainage (Revision A) [REP1-023].

The Applicant has strengthened the evidence base further through Hydraulic Modelling Technical Note [REP2-053], which supports the conclusion that the Scheme will not increase flood risk in Lavendon and demonstrates that village flooding is driven by multiple catchment-wide mechanisms that cannot be resolved by measures within Green Hill G alone.

Yours sincerely,

ARTHIAN LTD

BY:

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