Green Hill Solar Farm

EN010170

Applicant's Response to Report on the Implications for European Sites (RIES)

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 5

The Applicant's Response to Report on the Implications for European Sites (RIES)

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document has been prepared by the Applicant to respond to the Examining Authority's (ExA) Report on the Implications for European Sites (RIES), issued 28 January 2026 **[PD-014]**, in relation to Green Hill Solar Farm.

2 Applicant's Response to Questions in the ExA's Report on the Implications for European Sites (REIS) [PD-014]

REIS Q	Question to	Question	Applicant's Response
RQ1	The Applicant	Please provide a figure (or the examination library reference to the document where this figure can be found) depicting the plans and projects assessed by the applicant in its HRA Report.	The Habitats Regulations Assessment (HRA) **[EX5/GH7.21_B]** has been updated to include a new figure, Figure 7.21.6, showing the projects in relation to the SPA/ Ramsar site, and the Order Limits.
RQ2	The Applicant	Please provide the list of birds forming the waterbird assemblage within the appropriate text and tables in an updated HRA Report.	The species forming the waterbird assemblage are detailed in paragraph 5.2.22 in the Habitats Regulations Assessment (HRA) [**EX5/GH7.21_B**]. Table 2 (Summary of Screening Outcomes in Isolation and in Combination) has been updated to include these species individually.
RQ3	The Applicant	Please provide an update to the HRA Report [REP1-153] to confirm that this impact-pathway could give rise to LSE. Please also include an assessment of disturbance to species outside the SPA for adverse effects on integrity.	The Habitats Regulations Assessment (HRA) **[EX5/GH7.21_B]** has been updated to scope in disturbance to species outside the SPA, with subsequent appropriate assessment.
RQ4	The Applicant	Please update the HRA Report [REP1-153] by the addition of the conservation objectives for the UNVRS.	Confirmation that the conservation objectives for the SPA also apply to the Ramsar, has been added to the Habitats Regulations Assessment (HRA) [**EX5/GH7.21_B**] in paragraph 5.2.28.
RQ5	Stop Green Hill Solar (SGHS)	With reference to your response in [REP1-218], please provide the document title and examination library reference where these limitations were identified.	n/a

REIS Q	Question to	Question	Applicant's Response
RQ6	Stop Green Hill Solar (SGHS), Natural England (NE), North Northamptonshire Council (NNC)	Please confirm if you have further comments or concerns in relation to the applicant's survey data.	n/a
RQ7	Natural England (NE)	Please comment on the applicant's clarifications on the suitability of the proposed fields, the methods of habitat creation and their timing, as well as management and monitoring measures, in light of your previous comments [RR-1242, REP1- 181, REP1-182]. Are you satisfied that the applicant's approach, set out in its updated OLEMP [REP3-062] and associated plans REP3- 042 to REP3-055] covers your concerns? If so, are you satisfied that these measures are sufficient (and sufficiently secured) to reach a conclusion of no AEoI on qualifying features of the UNVGP SPA and UNVRS? If not, please set out what further information is required to reach this conclusion.	n/a
RQ8	The Applicant	Please provide further details of the potential 'short time lag' [WNC 4.235, REP2- 049] expressed as occurring between FLL being lost to SPA qualifying features and mitigation land being available	As per Section 4.10 of the Outline Landscape and Environmental Management Plan (OLEMP) **[EX5/GH7.4_D]** and the newly prepared Method Statement 13 in the Outline Ecological Protection and Mitigation Strategy (OEPMS) **[EX5/GH7.5_C]**, all FLL mitigation fields will be secured and maintained as suitable for foraging

REIS Q	Question to	Question	Applicant's Response
			golden plover and lapwing from the outset of construction to the end of the operational lifetime of the Scheme. FLL mitigation fields may be secured, and any proposed habitat conversion works enacted, ahead of commencement of construction, but this may not be possible in all cases. Where habitat conversion works cannot take place pre-construction, they will either take place in the next available window following commencement of construction, or the next window following harvest of the existing crop. For grassland seeding, these works are seasonally constrained to late summer/autumn (late July-October), or spring (March-May). The maximum window between commencement of construction works and seeding is 12 months (if construction were to commence in November following sowing of a winter-sown crop, and seeding not be completed until the following October, post-harvest). This is a worst-case scenario. Until seeding works take place, the fields will be maintained in their current land management type as suitable for foraging by golden plover and lapwing. As such, there will be no net loss of FLL at any stage.
RQ9	Natural England (NE)	Do you consider that mitigation land for loss of FLL should be available and functional prior to the loss of FLL to the UNVGP SPA and UNVRS? If so, can NE comment on the applicant's assertion that sufficient existing land is available during any time lag between	n/a

REIS Q	Question to	Question	Applicant's Response
		loss of FLL and mitigation land becoming available? Please comment on the timing of the applicant's measures included in the applicant's OLEMP [REP3- 062], do you consider these sufficient and if not, what additional information or commitment(s) are required of the applicant?	
RQ10	North Northamptonshire Council (NNC) and West Northamptonshire Council (WNC)	Please comment on the timing of the availability of the proposed mitigation for FLL, set out in the applicant's updated OLEMP [REP3-062].	n/a
RQ11	The Applicant	Please provide an updated assessment of the disturbance within the SPA impact-pathway for AEoI to clarify the baseline used for all components of the waterbird qualifying feature and other specific qualifying features.	To confirm, as per paragraph 7.2.81 of the previously submitted HRA [**REP1-153**], the 5-year data tables displayed counts for species where they were recorded by the surveys. The absence of a species within these tables meant they were absent during the surveys. For clarity, null records (0 counts) have been included for the other species in Tables 6-9 within the updated Habitats Regulations Assessment (HRA) [**EX5/GH7.21_B**].
RQ12	The Applicant	The ExA requests that the applicant provide measures to address AEoI from habitat fragmentation and to FLL in a single method statement for ease of reference, such as a consolidated Method Statement within the OEPMS.	Please refer to the new Method Statement, Method Statement 13, within the OEMPS **[EX5/GH7.5_C]** this outlines mitigation for loss of Functionally Linked Land and disturbance to SPA species.

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RQ13	The Applicant	Please provide further details of how this approach would work in the event that birds do not relocate as described. Please also describe the alternative or remedial actions that would be taken, therefore, in response to the proposed pre-works inspections. How will this continue to be monitored? Please include any further information within the updated Method Statement requested in RQ12.	The Habitats Regulations Assessment (HRA) [**EX5/GH7.21_B**] has been updated to describe how works would be delayed until any significant flocks of birds present in the fields move on of their own volition, subject to monitoring by the EcoCoW. Typically, flocks move through the landscape day-to-day; as such, this would only be likely to entail a 24-hour delay to works. Please also refer to the new Method Statement, Method Statement 13, within the OEMPS **[EX5/GH7.5_C]**.
RQ14	Natural England (NE)	Please comment on the applicant's proposed Method Statement 10 approach [REP1-140].	n/a
RQ15	The Applicant	Please update the HRA Report [REP1-153] to include the assessment of the AEoI from disturbance to qualifying features outside the SPA boundary.	The Habitats Regulations Assessment (HRA) [**EX5/GH7.21_B**] has been updated to scope in likely significant effects from disturbance to qualifying features outside the SPA boundary, with subsequent appropriate assessment completed. This confirms that no adverse effects on integrity associated with this pathway are likely.
RQ16	Natural England (NE)	Please comment on the applicant's updated mitigation measures in place in relation to disturbance (OLEMP section 4.10, [REP3-062]). Are you satisfied that with measures in place there would be no AEoI from noise and visual disturbance to areas of FLL, both existing FLL and that proposed as mitigation for loss of FLL from the proposed development?	n/a

REIS Q	Question to	Question	Applicant's Response
RQ17	Natural England (NE)	Do you have any comments on the applicant's proposed mitigation measures for control of waterborne pollution through the OBSSMP, para 1.1.13 [REP1- 143] with regard to the waterborne pollution impact-pathway? Can NE confirm whether it is satisfied that there are no AEoI from this impact pathway on all qualifying features of UNVGP SPA and UNVRS?	n/a
RQ18	The Applicant	Please provide an update on your discussions with the Environment Agency and any agreements reached in relation to acceptable mitigation measures to address risks from battery fire. Where additional measures are required specifically to address concerns raised in relation to European sites, please reflect this in the updated HRA Report.	A meeting was held on the 19th February 2026 to discuss outstanding matters on the Statement of Common Ground with the Environment Agency. A series of documents have been updated to provide clarification in regard to the mitigation measures to address risks from battery fire. At this stage the Applicant is committing to drainage and pollution prevention principles rather than a fixed construction specification. This is a performance based commitment focused on impermeability where needed, isolation capability and controlled management of runoff, with the detailed arrangement to be confirmed at detailed design with the Environment Agency, Local Lead Flood Authority and other relevant consultees. The **Flood Risk Assessment and Drainage Strategy [EX5/GH6.3.8.1_B]** and associated Annexes, including **Annex E [EX5/GH6.3.10.6_B]** and **Annex J [EX5/GH6.3.10.11_B]**, together with the **OBSSMP [EX5/GH7.7_B] and Outline Operational Environmental Management Plan [EX5/GH7.2_C]**, confirm that incident

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			related pollution control is addressed through containment and isolation measures at those parts of the Scheme. Drainage serving the BESS infrastructure and associated access will be designed as a discrete, sealed and isolatable catchment, incorporating isolation valves and providing impermeability where required, so that retained water can be contained and tested prior to controlled release or off-site management as appropriate. Inspection and maintenance of containment systems, isolation valves and associated impermeable drainage features will be undertaken to ensure long-term integrity and continued performance. The Environment Agency were in verbal agreement with the approach subject to receiving the documentation at Deadline 5. Following implementation of the above measures, no adverse effects on integrity associated with this pathway are likely.
RQ19	Stop Green Hill Solar (SGHS) and North Northamptonshire Council (NNC)	Please comment on the further measures identified by the applicant in the OBSSMP [REP1-143] in relation to your concerns on the SPA and Ramsar site.	n/a
RQ20	Environment Agency (EA)	Please confirm your position in relation to the mitigation measures proposed to address risks from battery fire.	n/a