Green Hill Solar Farm

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Applicant's Comments on Further Commentary to ExA Second Written Questions

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Contents

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Report Prepared for: Green Hill Solar Farm

Examination Deadline 5

Applicant's Comments on Further Commentary to ExA Second Written Questions

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1 Introduction

1.1.1 This document provides Green Hill Solar Farm Limited's (the 'Applicant's') response to submissions made to the Planning Inspectorate (PINS) by 14 January 2026, relating to Examination Deadline 4 for the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').

1.1.2 This report provides the Applicant's comments on responses or further commentary to the Examiners Second Written Questions submissions by Host Authorities, Statutory Consultees and Parish Councils.

1.1.3 Section 2 of this report is tabulated to include the ExA's question reference number, the commentary made by the relevant Parties and the Applicant's follow up response to each matter raised.

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

2.1 Historic England [REP4-040]

Reference	Question	Response	Applicant's Response
HE-01	*Pre-text*	Thank you for consulting Historic England in regard to the Examiners questions in relation to Green Hill Solar project. We note we have been named as a party in Q2.11.1, Q.2.11.2 and some subsequent questions around the Environmental Statement. Please find below our considerations and responses in regard to these particular questions. These responses have been drafted in consultation with our Inspector of Buildings and Areas, Tristan Hazel, who has attended two site visits and assisted with preparation of prior written representations.	The Applicant notes this comment.
HE-02	Q2.11.1 **Setting of designated heritage assets**	In consultation with Mr Hazel, we consider that that the proposed mitigation has satisfied our earlier concerns, and that the proposed mitigation is proportionate and effective to mitigate and reduce the level of harm the proposals present to the conservation areas at Mears Ashby, Walgrave and Old.	The Applicant notes this comment and that the mitigation is considered proportionate and effective in reducing the identified harm to the Mears Ashby, Walgrave and Old Conservation Areas.
HE-03	Q2.11.2 **Registered Park and Garden of Castle Ashby**	Following site visits and further engagement with the applicant, it is apparent that there is existing power infrastructure of a similar nature in the proposed location already, and thus some additional massing would not be overtly harmful. The site visits and subsequent engagement with the applicant demonstrated that the impact to setting can be mitigated though the proposed mitigation, which is assisted by the topography. Combined, this alleviates our concerns regarding the impact to the setting of the Registered Park and Garden of Castle Ashby. Your examining authority also asked Historic England the following: Whether Historic England has any concerns regarding the Environmental Statement conclusions in [APP-049] of the potential for moderate adverse effects on the Grade I Listed Church of St Peter and St Paul, Easton Maudit (and indeed the other 3 designated heritage assets listed at paragraph 12.10.3 of [APP-049]) The other three designated heritage assets listed in paragraph 12.10.3 are Mears Ashby Conservation Area, Easton Maudit Conservation Area, Grade I Listed Church of St Peter and St Paul (NHLE 1189610) and Grade II* Listed 22 High Street (NHLE 1040784). In regard to the Church of St Peter and St Paul we have engaged with the applicant regarding removing some panels from parcels that may contribute to the significance of the asset in terms of its setting. We note in Table 12.28 ([APP-049]) the applicant has highlighted removal of proposed solar panels from Scheme in Fields FF9, FF13, FF14, FF16 and FF22, and offsets in Fields FF11, FF15, FF19 and FF26, as well as Enhanced screening of existing hedgerow and tree belts. We welcome this approach but acknowledge that there remains some harm to the significance of the asset, derived from its setting, which we agree would be in the moderate adverse range. The applicant has taken a pragmatic and proactive approach to mitigation of harm in these areas. We do not have concerns in respect of the Grade II* Listed 22 High Street (NHLE 1040784). The assets does not principally derive its significance from its setting, and is nestled with the settlement; thus, we are comfortable with the applicant assessment and suggest that their mitigation approach is satisfactory. In regard to the listed conversation areas, we suggest our response to Q.2.11.1 can be applied to both assets sited in this additional question.	As detailed in **ES Appendix 12.8 Consultation Tables [APP-148]** the Applicant undertook a through programme of consultation with Historic England, including several site visits. Consultation with Historic England was used to inform the Scheme design and mitigation proposals. The Applicant notes Historic England's confirmation of the findings of the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-049]**, and **Volume 3, Appendix 12.1: Heritage Statement [APP-110 to APP-120]**, as well as their agreement that sufficient mitigation is proposed for the designated assets where potential adverse effects have been identified. The Applicant is progressing the SOCG with Historic England and as set out in the **Statement of Commonality Revision C [EX5/GH8.1.16_C],** following a meeting with Historic England on the 25 February 2026 with the aim of getting the SoCG signed off but Historic England was not in a position to review and sign off in time for Deadline 5. An updated SoCG will be submitted for Deadline 6 where it is anticipated all ongoing matters will become agreed.

Reference	Question	Response	Applicant’s Response
		With regard to the Statement of Common Ground, we will endeavour to assist the applicant in preparing a more informative document for the next deadline, where practicable.	

2.2 Stop Green Hill Solar [REP4-044]

Reference	Question	Response	Applicant's Response
SGHS-01	Q2.1.3 **Updated National Policy Statements for energy infrastructure**	SGHS wishes to comment: The Planning and Infrastructure Bill, introduced in 2025, will bring changes to the Nationally Significant Infrastructure Project (NSIP) regime, notably to the consultation requirements, aimed at ensuring quicker delivery of infrastructure projects. No changes are currently proposed to the content of Environmental Impact Assessments (EIAs) for NSIPs. However, The Institute of Sustainability and Environmental Professional (ISEP) have noted inconsistencies in approaches taken by developers in EIAs and have recently published new best practice guidance. SGHS would expect the applicant to review their EIA in line with this new guidance (Solar PV on Agricultural Land – Essential Components of Environmental Assessments and Reports - by ISEP dated 12th January, 2026). In addition, The Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) continue to state that where the proposed use of any agricultural land has been shown to be necessary, poorer-quality land should be preferred to higher-quality land (avoiding the use of BMV land where possible). While the development of ground-mounted solar arrays is not prohibited on BMV land, the impacts of such are expected to be considered. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low- and medium grade agricultural land.	The Applicant submitted an update to the **Planning Statement [REP4-012]** and **Policy Compliance Document [REP4-014]** at Deadline 4 which addresses the 2025 changes to National Policy Statement for Energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3). The Applicant would reiterate that the transitional provisions state that for DCO applications accepted for examination before the final publication of the approved 2025 amendment, the 2023, designated in 2024 suite of NPSs should have effect in accordance with the terms of those NPSs. Consequently, the DCO application for the Scheme will be determined in accordance with Section 104 of the PA 2008. Please refer to the response to ALT-002 and SAMP-004 in **The Applicant's Responses to Relevant Representations [REP1- 161]** with regard to use of brownfield land and the site selection assessment. Further justification for the site selection process and use of BMV land is outlined in responses to 'SGHS-001 to SGHS-006' of the **Applicant's Response to Stop Green Hill Solar [REP4-021]**. The ES and application information has been reviewed against the recent ISEP Guide, and all matters have been fully addressed in the application material. As stated in **GH7.6 Outline Soil Management Plan [APP-550],** prior to any reinstatement, the quantity and characteristics of available soils should be assessed, and the soil profiles being reinstated will be designed to ensure the soils to be restored to their previous conditions. The **Outline Soil Management Plan [APP-550]** set outs the strategy, approach, methodology and guidance of soil mitigation, and the key requirements for developing a detailed Soil Management Plan (detailed SMP) pre-construction for soil handling during the construction, operation and decommissioning phases and detailed soil mitigations measures will be developed preconstruction in accordance with final design, construction programme etc and the most recent guidance.
SGHS-02	Q2.1.4 **Importing electricity to the Battery Energy Storage System (BESS)**	*Previous applicant comments: "All of the infrastructure necessary to deliver the Scheme, including the import and export of up to 500MW of power, has been fully assessed in the Environmental Statement (ES)."* SGHS wish to comment: This is factually incorrect as there is currently no detail at all as to the infrastructure of the BESS. Not the locations, not the MwH in total or by location, not the number or size of containers, not the spacing of the containers, crucially not the chemical contruction within each container. There has been no consultation with HSE to determine whether HSC (Hazardous Substances Consent) is necessary. In fact in answer to Q2 1.7 to the applicant about the requirement for HSC The applicant responded the Applicant confirms that it is not typical for BESS installations to require hazardous substances consent, however this cannot be confirmed until the detailed design of the BESS has been carried out. The applicant then continues to cite the Sunnica NSIP DCO ruling as if it were best practice "The Secretary of State … agrees that there is no requirement to obtain Hazardous Substance Consent in advance of receiving development consent. The Applicant is not requesting that the Secretary of State himself make a decision to deem hazardous substances consent within the DCO. The Secretary	The Applicant refers 'SGHS-066' to 'SGHS-072' in the **Applicant Responses to Stop Green Hill Solar [REP4-021]** where a response has been provided for the container design, compliance with NFCC guidance and agreement with Northamptonshire Fire and Rescue Service. As outlined in section 4.3 of **ES Chapter 4: Scheme Description**, to maintain flexibility in the design, the Applicant has assessed the impacts of the Proposed Development within the maximum parameters set out in this ES. The ES adopts a maximum design scenario approach, 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 need for flexibility in design, layout and technology is recognised in National Policy Statement EN-1.The ES and the assessments within it are based on the works proposed in the **draft DCO Schedule 1 [EX5/GH3.1_D] ,** the **Works Plans [EX5/GH2.4_F]** and the **Concept Design Parameters and Principles [REP1-153]**. The **draft DCO [EX5/GH3.1_D]** includes a requirement for the Applicant to submit to the relevant planning authority for approval the final detailed

Reference	Question	Response	Applicant's Response
		of State has been given no reason to believe that Hazardous Substances Consent will not be granted by the HSE at the relevant time." SGHS comment further: The reality of the situation is that Sunnica have still not commenced development post DCO consent some 18 months ago as there is a continuing legal dispute around the need for obtaining HSC which should have been contained within the DCO! We are in the early stages of these huge NSIP solar developments and should be trying to improve the quality and standards in any DCO, not merely repeating the mistakes of the early adopters.	design proposals prior to commencement of construction of the Scheme. These Requirements would have the effect of demonstrating that the final detailed design remains within the design parameters (and therefore the Rochdale Envelope standards considered in this ES) and accords with the design principles identified within the **Concept Design Parameters and Principles [REP1-151]**. The Applicant is not aware of any legal dispute concerning Hazardous Substances Consent (HSC) in which Sunnica is currently involved in. The Applicant understands that Sunnica project has recently applied for a non-material change (NMC) to change the proposed location for the cabling to connect the project to the National Grid substation, following discussions with National Grid. The Applicant maintains its position that it is not typical for BESS to require hazardous substances consent (HSC), but that is not possible at this time to determine whether the BESS will contain hazardous substances in quantities requiring HSC. This information would be obtained from the data sheets provided by the manufacturer or supplier. Given the rapid development of BESS technology, no decision has yet been made on the manufacturer or supplier, and the detailed design of the BESS will take place post-consent. Until the detailed design phase, it is therefore not possible to determine whether HSC is required. It should be noted that the grant of development consent in the DCO does not remove the requirement for the Applicant to comply with the Planning (Hazardous Substances) Regulations 2015, including obtaining HSC if required. This position has been accepted by the Secretary of State in the Sunnica decision, in which the Secretary of State asserted that he "agrees that there is no requirement to obtain HSC in advance of receiving development consent".
SGHS-03	Q2.1.4 **Importing electricity to the Battery Energy Storage System (BESS)**	SGHS wishes to comment further: The Applicant Response is very clear regarding the use of the BESS during the Summer months at solar insolation maximum (particularly during May, June & July) when "excess" solar power being generated over and above the grid export maximum may be stored in the batteries for export to the grid later in the day. However, the use of the BESS during the Autumn and Winter months (October to March) remains unclear as seasonal solar intermittency, variability and volatility increases and insolation levels naturally decrease in the UK, probably to around one third of summer levels on (infrequent) clear days. The Applicant's Response refers to their Statement of Need (Section 7.9 Figures 22 to 26) and the provision of "grid support" services when there may be "excess" renewable wind power generation available for import into the BESS from the grid for later export and also possible grid stabilisation services, presumably if called upon to do so by the National Energy Systems Operator (NESO). On the 7th November 2025 Ofgem / NESO issued a "Call for Information (CfI)" regarding a very large increase in projected power demand / import from the grid (totalling 125GWe of additional electrical power demand / import) that was identified by the Energy Networks Association (ENA) as shown on their public Connections Data webpage. The large majority of this additional demand (97GWe of additional power demand / import) was arising in the UK Grid Transmission Network (NGET) directly as a result of connection applications for	The Applicant reiterates from its response to the ExA's Q2.1.4 that "storage assets support the operation of the renewable technologies they are co-located with ... by storing energy when it is generated in abundance and releasing it later when it is needed" Paragraph 9.3.4 of the Statement of Need [**APP-556**] provides NESO's view of the future electricity system: "Traditionally, risks to meeting electricity security of supply, have been at times of high demand [however] as we move to higher volumes of weather-dependent renewable energy, we will also face additional challenges around both the oversupply and undersupply of renewable generation" (NESO Future Energy Scenarios (2024), p99). The Applicant's response to ExQ2.1.4 sets out the three operational modes in which the BESS is likely to operate and the context provided by Paragraph 9.3.4 of the Statement of Need (quoted above) means that any of the three modes could be required at any time of the year, dependent on levels of national demand, the weather, and the evolving composition of the future GB generation fleet. The Applicant notes the November 2025 Ofgem / NESO 'Call for Input" (CFI) and notes that it is Ofgem's "understanding that data centres account for a significant share of growth in the demand queue." Ofgem's guidance

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		electricity storage systems (including demand from BESS imports). Further clarification regarding this "unintended consequence" is awaited from NESO / DES&NZ. As a result of the foregoing SGHS would therefore raise the question: What safeguards and assurances will be given by the Applicant that the scenarios described in their Statement of Need (Section 7.9) will NOT give rise to additional (and unnecessary) import / "call" on grid electrical power demand? BESS electrical power import constraint would be required particularly throughout the UK colder Northern Winter months. At this time solar generation will be sporadic (if any at all) and wind generation would be unreliable & highly variable, subject to winter storms (low pressure depressions requiring feathering / and / or constraint to physically protect the wind turbine structures) or the opposite dunkelflaute (gloomy calm high pressure) with little wind generation (certainly no "excess / surplus"). There is therefore a significant risk that unnecessary import / "call" on grid electrical power demand from the Green Hill BESS would merely give rise to additional "dispatchable" demand from the UK fleet of 35GWe of existing combined cycle gas turbine power generation. This would clearly have the "unintended consequence" of not only increasing unnecessary "fossil fuel" electrical power generation but also increasing greenhouse gas emissions rather than reducing them (as claimed by the Applicant)."	can be found at https://www.ofgem.gov.uk/sites/default/files/2025-11/Demand%20connections%20update.pdf. Further, given that storage technology is classified as a generation technology under the relevant industry rules, the Applicant understands that storage connections are grouped with generation connections, while demand connections, which are the subject of this CFI, are grouped in a different category of connection. Data which supports this point can be found at the resource Ofgem refer to in their guidance, at: https://www.energynetworks.org/industry/connecting-to-the-networks/connections-data. The Applicant does not believe that the provision of any 'safeguards and assurances' such as those requested by the respondent are required, or indeed are a planning matter. This is because they are already a matter for the proper and legal functioning of the electricity market and the rules by which participants in that market must abide. Section 10.2 of the Applicant's Statement of Need [**APP-556**] provides an explanation on the mechanics of pricing in the GB electricity market, which by extension explains why BESS support co-located schemes by storing energy when supply is stronger than demand, and release that energy when demand is stronger than supply. This action is to the benefit of the GB consumer through supporting security of supply and providing downward pressure on prices at times of low renewable generation. A co-located BESS will provide support to the solar scheme in all seasons of the year. Finally, the Applicant disagrees with the respondent's assertion that "there is a significant risk" that (paraphrasing) the Green Hill BESS would require additional fossil fuel generation to run so that the BESS can be charged. The Applicant considers that this is in fact a very insignificant, remote and commercially irrational risk. In all but the most remote and most unlikely circumstances, it would be much lower risk and lower cost for market participants to keep energy in a fossil fuel form until it is needed, rather than incurring efficiency- and conversion- related losses associated instead with burning that fuel, generating electricity, transmitting electricity to the BESS and storing it for later dispatch. This is because doing so would make the "stored then dispatched" energy more expensive than any energy generated directly from the fossil fuel at the later time (if at all) it was needed. The Applicant has offered Stop Green Hill Solar an opportunity to have a meeting to provide a further explanation of this fundamental market process. At the time of writing, the Applicant is waiting for confirmation on a convenient date to meet.
SGHS-04	Q2.1.5 **BESS Emergency Response Plan**	Why would the applicant regard the Environment Agency as a useful consultee and not the HSE who are the responsible party? Having heard the expert witness Professor Peter Dobson OBE who used to run the European Nano Safety Program and who counselled caution about nano particulates of fluorides causing health risks in the event of a fire up to 10km away would the applicant not deem it prudent to seek further expert advice from the HSE? SGHS submit	Please refer to the Applicant's response to Action Point 3 within the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP3-076]** in regard to not including the Health and Safety Executive as a consultee.

Reference	Question	Response	Applicant's Response
		that the applicant should consult the Parish Council of the village housing the BESS.	The Applicant has assessed the key pollutants from a BESS fire, including hydrogen fluoride (**Environmental Statement Appendix 16.2 BESS Fire Emissions Modelling [APP-167]**) using worst case parameters and in accordance with best practice guidance. The emissions included in modelling were requested by the UK Health and Security Agency (UKHSA) who are a Statutory Consultee for the scheme; results indicate very low risks to health at sensitive sites.
SGHS-05	Q2.7.7 **Llanwern solar scheme**	Llanwern Solar Farm – 260 acres, site was part of Gwent Levels SSSI, had apparently been mostly neglected agricultural grazing land. Height of ground-mounted solar panels about 2.5 – 3 metres apparently, non-tracking. Green Hill Solar – almost 3000 acres, mostly on productive arable agricultural land. PV panels, type yet to be decided, but planning for 4.5 metre, probable tracking panels. The adverse effects on Ecology in the post-construction monitoring report on Llanwern Solar Farm include marked increases in levels of toxic pollutants, decimation of bat populations, and compaction of soil and lack of vegetation growth under panels. 1) Toxic pollutants – The Applicant in REP2 – 048 states that: 'Regular inspections and maintenance of battery storage systems and solar panels will be routinely undertaken to identify any signs of potential leakage, wear, or faults. This ensures early detection and rectification of issues, thereby minimising operational risks. Additionally, solar panels will undergo routine cleaning using water only, to prevent environmental contamination and maintain optimal performance.' So they are actually admitting there could be problems arising from the solar panels themselves. But there is no evidence in the post-construction monitoring of Llanwern Solar Farm that the contamination was due to faulty solar panels. The onus is on the Applicant to demonstrate that there would NOT be any such issues, not for Stop Green Hill Solar to prove that there would be. 2) Decimation of bat populations – this is what was found in post construction monitoring; it is not speculation. Please also see answer below to Q2.7.8. 3) Compaction of soil and lack of vegetation growth under the panels – The proposed Green Hill Solar development is on a much larger scale than the already developed Llanwern scheme and the proposed panels are considerably larger and probably tracking. Therefore it would be a reasonable assumption, although unproven, that the ground mountings would need deeper piling, with larger and heavier equipment required to achieve this, and the panels themselves would potentially be heavier particularly including equipment to allow tracking. So the likelihood of soil compaction in the area of solar panels is probably significant. As far as lack of vegetation growing under the panels is concerned, the Applicant states in REP2 – 050 that: 'Recommendations for the creation and management of habitats within the solar arrays is based on the findings of extensive long term monitoring of active solar arrays by the Applicant's ecologist, providing a degree of confidence that the proposals are reasonable and practicable'. However, how can they claim this, as the only potentially comparable solar farm on this scale already constructed is Cleve Hill, in North Kent, which only became operational this summer 2025? Therefore there cannot be any long-term monitoring of any similar type of scheme available yet. (To get an idea of what the ground is like under the Cleve Hill development,	Please refer to the Applicant's response SGHS-090 in **Applicant Responses to Stop Green Hill Solar [REP4-021]** for comments relating to pollution prevention measures, bats, soil compaction, and vegetation beneath panels.

Reference	Question	Response	Applicant's Response
		there is a video produced by 'Hands Off Our Marsh' campaign group which clearly shows at 2 minutes, 21 seconds, that underneath Cleve Hill's massive solar panels there is mostly bare earth.) Again, the onus is on the Applicant to demonstrate that their proposed development WILL NOT have these effects. In conclusion, the information provided by Stop Green Hill Solar is not about comparing, we're simply showing that the construction of solar developments can lead to significant direct and indirect adverse effects on flora and fauna due to factors including waterborne pollutants.	
SGHS-06	Q2.7.8 **Bat Study Methodology**	This paper will have been peer reviewed by expert ecologists in order to have been accepted for publica on in an established journal. Therefore it will have undergone thorough scrutiny of the methodology employed. The full reference is: Tinsley E, Froidevaux JSP, Zsebok S, Szabadi KL, Jones G. Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. Journal of Applied Ecology, 2023; 60(9), 1752-1762 It is available to Open Access. As far as SGHS can establish, the height used by the Ecologists (working for the Applicant) for their static detectors was 2 metres (as opposed to the 1.27 metres in the above research). They do not state this directly in their ES document on Bat Surveys, APP-089, but they reference the method to the Bat Conservation Trust Good Practice Guidelines which recommend this height. We are unable to comment directly on any effect of having detectors at different heights for the efficiency of collecting data. However, the Applicant in REP2-048, and also identically in REP2 -050, uses the fact that 1.27metre height might be too low in the centre of the fields with solar panels, called 'open habitats' in the paper, compared to 'boundary habitats'. The Applicant stresses that they will be creating be er boundary habitats for bats along the sides of fields with solar PV. But the results in Table 1 of the paper, even if the results for the centre field detectors are discounted completely (because the detectors within panels might be unable to pick up bat activity at a different height), show that there are very marked reductions in bat activity for 6 out of 8 species along the boundary habitats where the height of the detectors and surroundings are equivalent, and so cannot be said to influence the comparison between the results. And for other species, there was no significant difference between activity in the centre of solar and non-solar PV fields. If the height of the detectors led to reduced detection in the centre of PV panel fields, it presumably would apply to all species. Green Hill Solar's Ecologists discovered very rich populations of bats on all sites, and they concluded in the Bat Survey Summary of Appendix 9.6 in the GHS ES, that 'The overall bat assemblage score for the Survey Area falls between 17 and 26, indicating an assemblage of between Regional to National importance'. In total across all the Green Hill solar sites, 47% of bats recorded were Common Pipistrelle and 42% Soprano Pipistrelle. In this research paper, at the boundary habitats, Common pipistrelle call sequences were reduced by more than a third, and Soprano Pipistrelle call sequences by more than two thirds. So the main populations of bats across the proposed GHS development are likely to be very significantly adversely affected by the presence of fields with solar PV. It is also worth noting that this study's data was collected in 2019 and 2020, on much smaller solar farm developments. The effects when translated to far larger	The Applicant has previously provided a response to this comment - please refer to SGHS-091 in **Applicant Responses to Stop Green Hill Solar [REP4-021]**.

Reference	Question	Response	Applicant's Response
		continuous cover with taller and potential tracking panels is not likely to be less significant. However, as before, the onus is on the Applicant to show that the effects on bat populations shown is this study are NOT relevant to their proposed development.	
SGHS-07	Q2.11.2 **Registered Park and Garden of Castle Ashby**	SGHS would like to comment: Has the Applicant considered the potential land contamination of the Grade 1 registered Park and Gardens arising from any heavy metals and fluorides dispersed due to a BESS fire? As the Park and Garden is only 50m away from the proposed site, it is well within the applicants 1km model area.	The Applicant has assessed potential emissions from a BESS fire, including hydrogen fluoride in **Appendix 16.2 BESS Fire Emissions Modelling [APP-167]**. Worst case BESS fire locations (i.e. locations within the BESS Site closest to sensitive receptors) have been modelled as depicted in **Figure 16.4 BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [APP-462]**. The assessment focused on airborne pollutant exposure, and results indicate very low risks to health at sensitive sites. Castle Ashby Registered Park and Garden is situated southwest of Station Road, seven receptors (Station Road 1 to 7) were modelled. In regard to human health, as indicated in Table 9 of **Appendix 16.2 BESS Fire Emissions Modelling [APP-167]**, the predicted maximum one-hour PM10 concentrations were all well below the eight-hour Workplace Exposure Limit (4mg/m3) and all other maximum one-hour concentrations were below Acute Exposure Guidance Levels level 2 (irreversible or other serious, long lasting health effects or an impaired ability to escape). Ground contamination is considered within **ES Chapter 22: Ground Conditions and Contamination [REP1-025],** no significant effects have been identified. Contamination of water resources is considered within **ES Chapter 10: Hydrology, Flood Risk and Drainage [EX5/GH6.2.10_B]**, no significant effects have been identified. The **ES Appendix 10.1_ Flood Risk Assessment and Drainage Strategy [EX5/GH6.3.10.1_B]** secures drainage and pollution prevention principles containment which focus on the isolation and prevention of contaminant discharge. These principles have been discussed and the approach agreed with he Environment Agency which will be formally agreed through the Statement of Common Ground **[EX5/GH8.3.5_B]**. The Applicant will implement good practice management and mitigation measures to minimise pollution risk, as detailed in the **Outline Construction Environmental Management Plan (Revision B) [EX5/GH7.1_B]**, **Outline Operational Environmental Management Plan (Revision C) [EX5/GH7.2_C]** and **Outline Battery Storage Safety Management Plan (Revision B) [EX5/GH7.7_B]** which are secured through Schedule 2 of the **draft DCO [EX5/GH3.1_D]**. Given the short duration and low likelihood of a BESS fire, the potential for significant land contamination is considered very low.
SGHS-08	n/a Agriculture and Soils	SGHS would like to draw the ExA attention to the latest report and guidance by Institute of Sustainability and Environmental Professionals (ISEP): Solar PV on Agricultural Land – Essential Components of Environmental Assessments and Reports - (12th January, 2026) which states: The "best and most versatile" farmland should be protected amid rapid expansion of UK solar power"	The Applicant noted the new Advice Note on Solar PV on Agricultural Land – Essential Components of Environmental Assessments and Reports from Institute of Sustainability and Environmental Professionals (ISEP). The report states that "best and most versatile (BMV)" farmland should be protected amid rapid expansion of UK solar power", which is in line with the policy requirement from National Policy Statement (EN-1) (EN-3) and National Planning Policy Framework. The assessment of agricultural land

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		In July 2025 CPRE pointed out that 59% of England's largest operational solar farms are located on productive farmland, principally in the arable East of England, where almost a third (31%) of the area they cover is classified as BMV agricultural land. Greenhill solar farm, if consented will be constructed on 66% BMV land! The guidance from ISEP has been issued as a result of inconsistencies in Environmental Impact Assessments for large scale solar power projects on UK farmland which prompted them to issue new advice to protect agricultural land and biodiversity, while balancing the growing demand for renewable energy" ISEP Senior Policy Lead for Impact Assessment, Dr Rufus Howard, said: "There is inconsistency in the approaches taken for Environmental Impact Assessments and planning applications for solar PV projects. The desired outcome of all these environmental assessment processes is to inform decision-making to assist the eventual return of farmland to agriculture in good condition"..... Recent events at Porth Wen on Anglesey, when solar panels were destroyed by strong winds, have shown that significant contamination by broken glass and chemical pollution can arise because of exceptional weather events that may be on the increase." The paper produces a check list of the main deficiencies in EISs produced for solar projects. • Soil/ALC surveys carried out at less than the required 100 cm sampling density and not to the required 120 cm depth (where possible) • Lack of representative soil pit descriptions to supplement auger data • Lack of reference to relevant published soil data to verify and supplement the results of the soil/ALC/ LCA surveys • Lack of identification of the potential soil contamination risks from damaged panels (including broken glass) and proposals for remediation • Incomplete assessment of the socio-economic impacts of a large-scale solar PV, such as displacement of tenant farmers and redundancy of the agricultural workforce • Lack of clarity as to how the condition of the land will be assessed after decommissioning and its suitability for farming • Lack of clarity as to how any BNG during operation might be retained on decommissioning, if the land is returned to farming. SGHS has reviewed the EIA submitted by the applicant and finds inconsistencies with the above best practice advice note.	and soils of the Scheme was guided by these national policies and in accordance with ISEP's A New Perspective on Land and Soil in Environmental Impact Assessment (ISEP, 2022) as indicated **in ES Chapter 20: Agricultural Circumstances [APP-057].** It should be noted that the new Advice Note was not a replacement of ISEP's A New Perspective on Land and Soil in Environmental Impact Assessment and is an advice note for clear expectation. The Advice Note set out expectations for soil and Agricultural Land Classification (ALC) surveys as listed in SGHS-08 response. The Scheme undertook a ALC survey in accordance with Defra's Agriculture Land Classification of England and Wales: Revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988) and the ALC survey was conducted at the required density of Defra's requirement at 100m per hectare (please note that it is not 100cm as stated in SGHS-08 response cell) and 13 soil pits were dug with soil profile descriptions as shown in **GH6.3.20.1 Environmental Statement Appendix 20.1 Agricultural Land Classification Technical Report [APP-172]**. In addition, **GH7.6 Outline Soil Management Plan [APP-550]** was developed to set out strategy, approach and commitment to protect soils and agricultural land during construction, operation and decommissioning stages. The GH7.6 Outline Soil Management Plan[APP-550] will be further developed into a detailed Soil Management Plan for implementation before construction, operation and decommissioning. With regard to siting, the Applicant has undertaken a 5-Stage Site Selection Process with a Widening the Search to consider Best and Most Versatile (BMV) Agricultural Land within the 20km search area **Appendix 5.1 (Site Selection Assessment [REP1-037])** in compliance with National Policy Statement for renewable energy infrastructure (EN-3), which is the furthest distance that the Applicant sought to locate the Scheme from the Point of Contact on commercial feasibility and the efficiency of the transmission of electricity to the grid. The search outcome indicates that the majority of the land within the 20km search area is Grades 3 or 2 land with high (>60%) to moderate (20-60%) likelihood of BMV land, which is roughly in line with the survey results of the Scheme. UK Food Security Report 2024 indicates that the 6.0 million hectares of the croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%.The 1200ha land for the proposed Scheme only represents 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK therefore it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security.

Reference	Question	Response	Applicant's Response
SGHS-09	Q2.13.2 **Mitigation planting**	This question was directed to the Applicant, but SGHS would like to comment on the Applicant's response because the question of whether the scheme would result in landscape benefit or harm is extremely important. It is also very important to note that mitigation is not benefit. Part of the Applicant's response to the question is as follows, with emphasis added: NNC LIR [REP1 -171] para 8.41 recognises that the proposed planting and habitat creation would deliver an enhancement relative to the existing conditions and goes on to affirm that the primary function of the proposed planting and habitat creation is intended to reduce the degree of adverse change arising from the development. Whilst this is somewhat correct, the proposed planning and habitat creation has been carefully designed to ensure compatibility with the existing character of the landscape to allow the Scheme to build upon and to not be incongruous. Please refer to REP1-195, SGHS's Landscape and Related Matters Statement Sec on 4.2, which explains the important difference between mitigation and enhancement, and why landscape / visual mitigation cannot be double-counted as landscape / visual enhancement (GLVIA3 para. 3.39), which is what the LVIA has done – as the above statement appears to confirm. Also, see REP1-195 paras. 2.3.2 - 13, under the heading Landscape receptors: 'fabric'. In summary, and to clarify: The matter of what the Applicant's LVIA [APP-045] calls landscape 'fabric' is relevant and important because it is central to the Applicant's claim that after 15 years of operation, the proposed development would result in significant beneficial effects upon the character of the sites. SGHS's landscape expert's assessment concludes that the proposed development would result in significant adverse effects on the character of the sites for the duration of the operation, and the effects could not be mitigated. Apart from a couple of passing references, the word 'fabric' is not used in GLVIA3. The references are i) at the 2nd bullet point of para. 7.3, this being a quota on from a 2012 Scottish Natural Heritage publica on relating to cumulative effects; and ii) at the 1st bullet of para. 7.25, also in the context of cumulative effects. However, for some reason, recently, some landscape practioners have started using the word 'fabric' in LVIA. In fact, landscape 'fabric' is just another word for what GLVIA3 and the majority of landscape practioners call landscape 'elements'. Use of the term in LVIA is not problematic, so long as it is clearly defined, and used consistently / appropriately. GLVIA3's Glossary defines landscape elements as 'Individual parts which make up the landscape, such as, for example, trees, hedges and buildings'. The Applicant's LVIA confirms this at para. 8.4.21, where 'fabric' is defined as 'the individual tangible elements or features such as landform, woodland, hedges, tree cover, vegetation that make up a landscape or site. These can usually be described and quantified' (but note that 'elements' and 'features' are not the same – see GLVIA3 Glossary). The LVIA's Glossary also confirms that 'elements' and 'fabric' are the same. Most importantly, the terms 'fabric' and 'elements / features' are not interchangeable with 'character'. 'Fabric', 'elements', and 'features' merely contribute to a landscape's overall character (and potentially, to its distinctiveness, value, and susceptibility to	The LVIA **[APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. 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. Please refer to North Northamptonshire Council Statement of Common Ground_ **[EX5/GH8.3.1_B]**, and West Northamptonshire Statement of Common Ground_**[EX5/GH8.3.2_B]** where the methodology is agreed. It is worth noting that GLVIA3 is not prescriptive, only providing guidelines for the approach to Landscape and Visual Impact Assessment (LVIA). This allows for some degree of professional differences in approach to LVIA to be incorporated into methodologies for LVIA, however the core approach and principles of any LVIA must align with GLVIA3. As stated, the Methodology for the LVIA has been progressed and agreed with the Local Planning Authorities. The LVIA **[APP-045]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure – and that this would result in Significant Adverse Effects. The LVIA **[APP-045]** acknowledges a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure. With the 1km Study Area, Adverse effects remain through to the decommissioning phase, although reduced and no longer Significant as a result of the establishment of the mitigation planting. NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* The Applicant would like to reiterate that the LVIA **[APP-045]** does not identify beneficial effects to Landscape Character as a result of the implementation of the landscape scheme during the construction period or operational lifetime of the Scheme, only to Landscape Fabric. The landscape proposals are substantial and the beneficial effects associated with these to landscape fabric are set out within the LVIA, with these beneficial effects only associated with the tangible gains provided to landscape fabric. It is fully acknowledged that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected, with the land now presenting as a large scale solar scheme. At the point the Scheme is decommissioned the landscape proposals help provide the long term legacy landscape benefits as set out within the LVIA **[APP-045]**.

Reference	Question	Response	Applicant's Response
		certain forms of change), along with many other factors including people; place; 'tangible / quantifiable' natural, cultural, and social aspects; and 'intangible' aspects such as visual and non-visual aesthetic, perceptual, and experiential qualities. These factors – all of which should be considered in LVIA baseline studies and assessments of effects – are illustrated in Figure 1: What is Landscape? on page 9 of Natural England's 2014 publica on An Approach to Character Assessment. Many of the factors of relevance to the Scheme are not included in the Applicant's LVIA, or are not factored into judgements about levels of sensitivity and effects. GLVIA3 para. 3.21 states that 'In LVIA there must be identification of… landscape receptors, including [1] the constituent elements of the landscape, [2] its specific aesthetic or perceptual qualities and [3] the character of the landscape in different areas…'. GLVIA para. 5.3 states that LVIAs should 'identify and record the character of the landscape and the elements, features and aesthetic and perceptual factors which contribute to it' (emphasis added). GLVIA para. 5.35 states that LVIAs should consider effects such as: • 'change in and/or par al or complete loss of elements, features or aesthetic or perceptual aspects that contribute to the character and distinctiveness of the landscape; • 'addition of new elements or features that will influence the character and distinctiveness of the landscape; • 'combined effects of these changes on overall character' (emphasis added). In the Applicant's LVIA, para. 8.4.21 states, 'All Landscape Receptors within the Local 1km Study Area will be included in the LVIA. This includes [1] the landscape fabric of the site itself…, and [2] the local landscape character…. The Landscape Fabric of the Sites themselves is considered a landscape receptor which will be assessed separately to the relevant Landscape Character Areas' (my emphasis). In other words, the LVIA assessed effects on 1) the sites' 'fabric' / elements (see REP1-041 ES Appendix 8.3 ES LVIA Assessment Sheets (Revision A) (Clean) - Individual Site Assessments - Landscape Fabric PDF pp. 631 – 667); and 2) the overall character of the landscapes beyond the sites' boundaries (same document, PDF pp 669 - 809), but did not assess effects on the overall character of the sites. This is a significant departure from GLVIA3 which, whilst only guidance, is still best practice, and such departure should be justified. Here it is relevant to note that as mentioned in SGHS's REP1-195, in REP1 041, the tables at PDF pp. 669 – 729 set out effects on landscape character within the 'local' 1km study area. LVIA para. 8.4.20 explains that the 'Local 1km Study Area… is the 1km area extending as a radius from the outer boundary of the Sites' (emphasis added), ie it does not include the sites themselves. However, confusingly, these tables are under the heading Landscape Character - The 1km Study Area (The Local Study Area) (Individual Sites) (emphasis added). The text in the tables provides information about the character of the sites as well as the landscapes beyond (although as noted in REP1-195, this information is insufficient, as it does not include all aspects of character as set out above, nor does it factor in the numerous natural and cultural variations in character which contribute to each discrete area's local distinctiveness and sense of place – see response to ExQ2.13.7).	

Reference	Question	Response	Applicant's Response
		However, although not entirely clear, it must be the case that the tables at PDF pp. 669 – 729 only describe effects on overall landscape character within the 'local' 1km study area, and not effects on the overall landscape character of the sites. That is because effects on the landscapes lying within 1km of the sites' boundaries would be indirect, whereas effects on the sites' character would be direct. Levels of adverse indirect effects on character are much lower than levels of adverse direct effects: the direct effect of replacing greenfield land with development of this type cannot be mitigated. The LVIA concludes that at Year 15, the proposed planting would have matured, and overall effects on overall landscape character within the 1km study area (which the LVIA confirms does not include the sites themselves) would be Moderate / Minor Adverse. (Note that throughout, the LVIA concludes that the levels of effects for each landscape receptor would be the same, which is unlikely given the notable localised variations in character throughout the study area – see SGHS's comments on the Applicant's response to ExQ2.13.7). However, firstly, see the note in REP1-195 about problems with the LVIA's criteria and point scales, at para. 2.4.5 – 17. Secondly (as explained in REP-195 paras. 6.1.20 – 23), note a) the omission of effects on character areas / types; b) the level of receptor sensitivity is higher than reported in the LVIA; c) not all indirect adverse effects on landscape character can be mitigated by screening views; and d) generally, levels of indirect landscape effects tend to be highest closest to the site and reduce gradually with distance. Therefore, at Year 15, it is likely that indirect effects on the landscapes closest to the site would be at least Moderate Adverse (significant). T he LVIA concludes that at Year 15, there would be Moderate Beneficial (significant) effects on the sites' landscape 'fabric' / elements (ie landform, woodland, hedges, tree cover, and vegetation). However, the reason for the beneficial effect is the LVIA's erroneous assumption that landscape / visual mitigating measures (eg screen planting) can be double counted as landscape / visual enhancement – see above. Therefore, at best, effects on 'fabric' / elements would be Neutral, as the proposals are mitigation not enhancement, and at worst, significant adverse, due to the mitigation measures giving rise to adverse effects on character and views for reasons such as inappropriateness and total loss of view, as explained in REP1-195. The LVIA does not assess effects on the sites' overall character, but my own assessment (see REP1-195) concluded that the development would result in significant direct adverse effects on the character of all of the sites for the dura on of the opera on.	
SGHS-10	Q2.13.4 **Cumulative Impacts**	SGHS would like to comment: The applicant has admitted that the Greenhill site was chosen based on grid export capacity at Grendon. There is currently a 49.99 MW BESS site in proximity to the sub-station and planning permission granted for an additional 49.99 MW BESS site adjacent, for which construction is anticipated within the next year. The Green Hill Solar DCO is considering adding a further 500 MW BESS site in close proximity. Another 49.99 MW BESS site just off station road has been applied for. NPS EN-3 states "applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure" We request that the ExA should consider carefully the cumulative impacts of creating a heavily industrialised zone of BESS so near human habitation.	Please refer to Part 2 in **Chapter 25: Cumulative Effects and Effects Interactions [APP-062]** where other developments including energy generating schemes in proximity to the Scheme have been reviewed for potential cumulative effects. The shortlist of other developments has been agreed with the three Host Authorities and further validated through their Local Impact Reports, responses to the Examiners' First Written Questions. The permitted Grendon Lakes scheme has been included in the assessment under ID 8 of Table 25.6 in **Chapter 25: Cumulative Effects and Effects Interactions [APP-062]**. The Applicant can confirm that the Scheme has a valid grid connection offer. The Scheme will therefore be able to connect to the grid and contribute towards targets. Section 7.9 of the **Statement of Need [APP-**

Reference	Question	Response	Applicant's Response
			556] expands on the benefits of co-locating storage with solar schemes and explains that the co-location of storage with renewable generation has benefits. NPS EN-3 states in paragraph 2.10.10 that the government is supportive of solar being co-located with other functions including energy storage. Therefore, the Scheme is in line with NPS recommendations.
SGHS-11	Q2.13.8 **LVIA Methodology**	*Previous comments: "The Councils appear to be content with the methodology used for the LVIA and landscape assessments and are satisfied that they follow GLVIA3. However, in SGHS's submission REP1-194 and REP1-195, it is considered that the applicant's LVIA method and process have errors and flawed assumptions have been made (paragraph S.11 onwards). Does the applicant's response to these concerns in SGHS-28 [REP2-048] satisfactorily address these issues?"* As noted in SGHS's responses to ExQ2.13.8 [REP3-103], SGHS's landscape expert does not consider that the applicant's response to these concerns in the Applicant's responses to Written Representations at Deadline 1 [REP2-048] satisfactorily address these issues. See SGHS's comments on REP2-048 SGHS Comments on Applicant's Responses to Written Representations at Deadline 1* for Deadline 3. The full technical reasons for the concerns are set out in REP1-195. Additional commentary is provided here because as explained in SGHS's comment on the Applicant's responses to ExQ2.13.2 above, SGHS consider that the question of whether the scheme would result in landscape benefit or harm is an important matter. Given the landscape experts' differences of opinion, it may be helpful for the LVIA method to be the subject of a round-table discussion. If significant disagreement about technical matters and interpretation of the guidance remains, if considered appropriate, it may be possible to seek an opinion from the Landscape Institute.	The Applicant notes this comment and is confident with their responses in REP2-048. 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 **[EX5/GH6.3.8.1_A]**, which has been progressed and agreed with the Local Planning Authorities. Please refer to **[EX4/GH8.3.1_A]** North Northamptonshire Council Statement of Common Ground_DRAFT, and **[EX5/GH8.3.2_B]** West Northamptonshire Statement of Common Ground_DRAFT where the methodology is agreed.
SGHS-12	Q2.13.10 **Effect on Local Roads**	*Previous Applicant comments: "In paragraph 4.167 - 4.169 of the LIR, reference is made to local roads having been omitted from the glint and glare assessments. The applicant has submitted a further Glint and Glare Technical Note [REP2 054], does this document address these omissions or do you consider further local roads should be included in the assessments?"* This question is directed to WNC, but SGHS would like to draw the Examining Inspectors' attention to REP3-101 (SGHS's Summary of Oral Submissions to ISH-2), paras. 54 – 66, which summarise the reasons (as explained in REP1-193 Appendices to SGHS's Landscape and Related Matters Statement, Appendix CT-I Glint and Glare) why the Applicant's recent assessment of glint and glare effects on local roads has concluded that receptors would only experience Low levels of effects, and why generally, in SGHS's opinion, the Applicant's Glint and Glare Assessment (GGA) [APP-052] is flawed. Regarding local roads specifically, the first paragraph of REP2-054 Sec on 2.1 Road Infrastructure – Local Roads states that 'Based on industry guidance, technical modelling is not recommended for local roads, where traffic densities are likely to be relatively low'. Firstly, the 'industry guidance' is precisely that – there is no independent GGA guidance. Secondly, the qualifying note to the above sentence in terms of traffic densities being relatively low (which is also a criterion for assessing effects on the safety PRoW users, as opposed to amenity	It is noted that in the absence of specific Glint and Glare legislation and guidance regarding impact towards users of local roads, industry guidance and best practice have been applied. Receptors included within the Glint and Glare Assessment also reflect receptors included in other, approved, DCO Solar applications. As summarised in **ES Chapter 15 Glint and Glare [APP-052]**, local roads were considered within the Glint and Glare Assessment. As highlighted within the chapter, density of users along local roads is just one factor considered when classifying the sensitivity of the receptors. The Applicant further considers potential impacts of glint and glare towards local roads within the **Glint and Glare Technical Note [REP2-0524]** and **North Northamptonshire Local Highways Glint and Glare Supporting Note [REP4-026]**. These conclude that a low impact may be classified towards local roads nearby to the Scheme.

Reference	Question	Response	Applicant's Response
		which is not assessed) is that 'therefore, a glint / glare event would not result in large numbers of casual es / fatalities, unlike an air, rail, or major road accident'. In SGHS's opinion, even one casualty / fatality should be of great concern, especially if the risks were identified but not mitigated.	
SGHS-13	Q2.16.4 **Access to Construction Compound 4**	*Previous Applicant comments: "…It is proposed for construction traffic movements to route via Sta on Road to access CR18, and then route south along the internal haul route south from Station Road to access the compound."* SGHS wishes to comment: Has the applicant calculated the amount of HGV traffic that there will be to construct the internal haul route? Experience with the construction of the Statera BESS demonstrates that the amount of traffic generated just to construct an internal haul route is considerable. Also, given that the internal haul route will inevitably be constructed from MOT or similar, what plans are in place for the removal of the internal haul route once the construction has finished? This road will cause a very obvious visual scar on the landscape just outside the village and adjacent to the Grade 1 listed park and gardens of Castle Ashby Estate.	Traffic movements during the construction period for this access have been subject to a further sensitivity assessment as detailed in the **Transport and Access Technical Note [REP2-055].** The traffic forecasts represent the peak daily movements that are expected for construction vehicles including the removal of any materials used to construct the haul road that is to be removed after construction.
SGHS-14	Q2.16.10 **Public access to the countryside and perceptions of safety:**	At present, as one walks along the Green Lane, there are two main options for escape. Firstly, there are wide entrances to each field on either side – some have gates, mostly they are not secured and can be opened, all would be relatively easy to climb over, and some there is space to walk around the posts on one or both sides. Secondly, there are some gaps in the hedgerows, more obvious in winter, where it would be possible to get through. Once in any of the fields to the east, these are all open arable, and many connect easily through to the Kettering Road. On the west side, there is only one field's width to Newland Road, and all fields have field gates on the Newland Road as well. If the proposed development received consent, as far as can be determined from the Illustrative Layout Plan for Green Hill A, GH 6.4.4.1, APP – 193, these opportunities for escape would be affected in several ways. Firstly, sight lines along the Green Lane will be shortened by the much higher vegetation on either side – this will both actually decrease any warning view but will also significantly increase the perception of the potential for danger. At present, there are mostly wide-open views along and across the local countryside, particularly in winter, as must have been appreciated by the Inspectors on their ASI. Secondly, there would be no potential for escaping through gaps in the hedgerows, as these will have been reinforced, and new higher planting growing to around 4.5 metres. Thirdly, it is unclear whether it will still be possible to use the field gate access, but even if this is possible, once through any of the gates, there will be a continuous fence along and between the fields, with options for escaping very limited to the far edges of only the fields at either end of the east side, i.e. AF18 and AF28, and on the west side, at the far ends around fields AF29 and AF17, but also in the middle perhaps, between fields AF14 and AF15. Therefore it is clear that easy options of escape and running across fields will no longer be available. It is not only the logical potential for increased risk that is the problem, it is the perception of increased risk which is even more powerful.	The Applicant refers to its response to Q2.16.8 in **Applicant's Response to Second Written Questions [REP3-074]**, which answer the Examining Authority's direct question to the Applicant with respect to public access to the countryside and perceptions of safety. The Applicant has previously responded to these comments from Stop Green Hill Solar: please refer to 'SGHS-094' in **Applicant's Response to Stop Green Hill Solar [REP4-021]**.

Reference	Question	Response	Applicant's Response
SGHS-15	Q2.17.1 **Environment Agency updated flood mapping dataset**	*Previous Applicant comments: "Where the level of risk or local factors required further assessment beyond the strategic NaFRA2 mapping, this was undertaken through detailed hydraulic modelling or, for minor watercourses, through open channel Manning's calculations with the appropriate climate change allowances, as documented in [APP-097] and the relevant annexes.."* SGHS wishes to comment: Notwithstanding the use of flood models, SGHS would be ready to provide photographs of recent flooding in the area which took place in September-October 2024 and which may not be appropriately accounted for in the most recent flood datasets.	The Applicant would be willing to review any additional photographs of flooding in the area as supplementary contextual information. Any such material would need to be accurately dated, geolocated, and clearly attributable to a defined watercourse or drainage feature so that it can be verified and interpreted appropriately. Photographic evidence would not, in isolation, alter the conclusions of the submitted flood risk assessment, which is based on a combination of Environment Agency and LLFA datasets, including NaFRA2 flood mapping, together with detailed hydraulic modelling where local conditions required further refinement and conservative climate change allowances. Any photographs received would be considered alongside this existing evidence base.

2.3 Bernard Livesey [REP4-045]

Reference	Question	Response	Applicant's Response
BL-01	Q2.16.9 **Easton Way**	I respond on my own behalf, on behalf of my wife who is a joint owner of […] and on behalf of the Parish which is concerned about the issue. I can confirm that I spoke on this issue at the CAH1 on Wednesday 10 December. There is absolutely no basis for arguing that the scope of the scheme should be enlarged - the cable access is openly accessible; there is no plan to dig the cables into the highway of Easton Way. Potential traffic management measures such as temporary Speed limits do not justify the intrusion into the functioning of the Highway at this point. And it appears, from what Claire Brodrick said in reply (see at recording 850-854), the idea to seek this additional extension came not as a result of need, but as an idea from the Highway Authority.	The Applicant refers to the **Written Summary of the Applicants Oral Submission at Compulsory Acquisition Hearing 1 [REP3-077]**. Temporary possession powers are to allow for the cutting back of any vegetation required and for traffic regulation measures to be implemented to enable safe crossing and access to the site. Ms Brodrick explained at CAH1 that due to the land being a public highway there are two powers applicable to the land to ensure that the Applicant has ability to carry out the necessary works (being the streets powers in Part 3 of the draft DCO and the powers of temporary possession in Part 5 of the draft **DCO [EX5/GH3.1_D]**). Ms Brodrick clarified that the Applicant is not able to take possession of the highway land to do as it wishes. This is controlled by the management plans (that will be approved by the relevant planning authority in consultation with the highway authority) that apply in order to facilitate safe access to the site.