Campaign to Protect Rural England Northamptonshire

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Application by Green Hill Solar Farm Ltd. for an Order granting Development Consent for a proposed solar development on land between Northampton and Wellingborough

CPRE Northamptonshire
Feedback on Applicant Responses to Deadline 3 Comments REP3-095
Deadline 5, 12th February 2026

This document contains our feedback to our Deadline 3 comments contained within the document **8.1.28 The Applicant Responses to Written Representations at Deadline 3 [REP4-020]**

Reference	Comment	Applicant response	Feedback
CPRE-001	This document contains the CPRE Northamptonshire's reactions to the responses submitted by the Applicant in response to our written representation within their document REP2-048 GH8.1.13_Applicant Responses to Written Representations. This means that in order to see our original comments it is necessary to correlate this document with REP2-048. The only exception if CPRE-023 which was duplicated in REP2-048 which has been relabelled as CPRE-023.1 and CPRE-023.2	The Applicant notes this comment	
CPRE-002	We remain of the opinion that the LVIA is cursory when compared to other applications to which we have responded and dismissive of the visual impacts of the scheme. This is partially because it focuses its assessment on landscape fabric over visual impact. It places undue reliance on the effectiveness of screening	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	We must agree to disagree.

	to fully mask the elements of the scheme and does not account for the undulating landscape. The methodologies used are not comparable to other schemes and generally under-rate adverse impacts. We even questioned among ourselves whether the Applicant was serious about pursuing the scheme as the LVIA felt incomplete and possibly half-hearted. As is the case throughout the application, we consider that the Applicant does not assess credible levels of impact. The villages surrounded by the elements of the scheme will cease to be desirable villages set in rural locations but villages set amongst solar farm infrastructure. For those that remain in the villages there would be a continuing sense of loss of what they valued about their location. For new residents there would not be the uplift	progressed and agreed with the Local Planning Authorities. 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 conforms to the landscape Institutes GLVIA3 has been progressed and agreed with the Local Planning Authorities.	

	that derives from living in an attractive rural location.		
CPRE-003	When CPRE Northants has previously argued that there should be a cumulative visual impact assessment of the separate sites because they would be perceived as separate schemes, the Applicant responded that this was not necessary because it is a single scheme. In this response they are now arguing that the sites are sufficiently separated to be viewed as individual unconnected schemes. Either the Applicant must acknowledge that the whole scheme impacts on the whole scheme area creating a new solar infrastructure landscape type, or they must carry out a cumulative impact assessment of the individual sites. They cannot have it both ways. We agree that the unusually large land take of the scheme allows it to be set back from	Although the Scheme comprises a series of independent areas of land or Sites, they are set within an extensive agricultural landscape. 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 road infrastructure aiding 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 far apart 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. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern. Due to the dispersed nature of the Sites within the Scheme, an assessment of the landscape and visual effects of Green Hill A-G and the Green Hill BESS, taken together, has been undertaken to determine the effects of the Scheme as a whole.	It appears from this response that the Applicant does not understand that cumulative visual impact is not restricted to concurrent visibility but also includes sequential visibility as receptors travel through the landscape. When remembered views of solar infrastructure are repeatedly reinforced by new views this creates that the impression that the landscape is scattered with solar developments. The separation between elements of the scheme are insufficient for the elements to be absorbed within the landscape.

	settlement edges. We do not agree that infrastructure of such a large size and scale can be assimilated into the landscape. We maintain the opinion that the scheme is wasteful in its land take and that scattering its components across the landscape it creates greater harm than if it was concentrated into one area. Please refer to our response in CPRE-005 below	The cumulative effects of each of the Sites are assessed and combined to achieve a set of effects of the Scheme to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme. The LVIA has identified that development of the Scheme would result in Significant Adverse Effects to Landscape Character within the 1km Study Area. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The six primary reasons are set out below: 1. Dispersed nature of the Sites: The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart 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. 2. Nature of Scheme being 'overlaid' and reversable: For example, developments for mineral extraction	

		fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' on the landscape. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. 3. Strong framework of existing vegetation: The strong framework of existing vegetation means that this would provide the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. 4. The benefits of mitigation: Year 15 would bring forward the benefits of the new planting in reducing the adverse effects. Please refer to the LVIA specifically Table 8.10 which sets out the Planting Typologies utilised within the Landscape and Ecology Mitigation Plans and Table 8.11 of the LVIA which sets out the quantity of landscape enhancements the Scheme would provide: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.14km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow.	

		• Six proposed ponds and wader scrapes; and • 1,079.53ha of groundcover. 5. Biodiversity Net Gain: In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver additional enhancement and connections to wider ecological networks as well as contributing to the enhancement of the quality of the landscape going well beyond biodiversity net gain. 6. Legacy Landscape: Legacy Landscape is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites At decommissioning, agricultural fields would be returned back to agriculture. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the	

		development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. The Applicant refers to their response to matter 'CPRE-004' in The Applicant's Responses to Written Representation at Deadline 1 [REP2-048] on the assessment that has been undertaken on cumulative effects within the ES Chapter 8 Landscape and Visual Impact Assessment [APP-045]. Within this response the Applicant confirms that the cumulative effects assessment of the Scheme is based on the 9 areas of land forming the Scheme and includes an assessment of both Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views) visibility.	
CPRE-004	It is difficult to know whether the Applicant is deliberately misconstruing this point. The point is that good spatial planning does not liberally	The Applicant notes this comment and refers to the Applicants Response to CPRE-004 within 8.1.13 Applicant Responses to Written Representations [REP2-048], and to our response to CPRE-003 above in regard to the dispersed nature of the Scheme.	It is extremely unhelpful that the Applicant has not specified which responses in REP2-048 are pertinent. We see nothing that address the merits of

	scatter undesirable development across the plan area, but brings it together in order to limit the overall area adversely affected. This scheme proposes to scatter solar infrastructure across the landscape which inevitably adversely impacts a greater area than would be the case for a concentrated scheme such as the Tillbridge scheme. When the existing Local Plans were created, they could never have anticipated that schemes of the size and scale of that proposed would come forward and so it is unsurprising that no sites were allocated. The expectation was that smaller schemes would come forward that could be accommodated within the landscape. Please refer to our response in CPRE-003 above.		concentrating undesirable industrial development into a one location. See the comment above regarding the dispersed nature of the scheme. We maintain that this scheme has a far wider adverse impact than a concentrated scheme and is in our view unacceptably harmful over a far greater area than the Tillbridge scheme..

	We profoundly disagree with these arguments and consider that the sites are not, as is suggested, sufficiently separated for remembered views of one site to be forgotten before encountering views of the next site. The scattering of the scheme across the landscape merely creates a wider landscape and more settlements that are dominated by solar infrastructure. We agree that the wasteful level of land take does create greater opportunity to plant screening but question whether this is a good use of agricultural and BMV land. We cannot understand how the Applicant suggests that the design reduces the impact on the use of BMV land given that the BMV land take is greater than comparable schemes. We do not consider the LVIA to be robust as we have explained above.		

CPRE-005	The arguments in SBMP-005 of REP-161 regarding mitigating climate change only address the impacts of climate change upon the scheme and not on the national threats resulting from climate change. The scheme may be robust to climate change but the threats identified by the Climate Change Committee and others are not addressed. Although we do not disagree that there is an urgent need to cut global emissions if global climate change is to be addressed, this can only hold back the impacts of climate change if there are global efforts to reduce emissions. Unfortunately, this is not happening and in fact last year global emissions increased at the fastest rate on record with China alone increasing their emissions by nearly double the total amount of UK emissions. This makes it more important than ever for the UK to prioritise	The Statement of Need [APP-556] ('SoN') provides evidence on the substantial benefits brought forward by large-scale ground mounted solar electricity generation generally, and the Scheme specifically, towards meeting the UK's critical strategic needs. The SoN sets out government's plan to deliver a clean energy system because of the critical decarbonisation, energy security and affordability benefits arising for GB consumers from delivering such a system (SoN, Section 3.9). The Applicant agrees actions are required by other countries alongside GB actions to fight climate change (SoN, Section 3.2), and it is the Government's policy to be an international leader in this area. Additionally, in relation to energy security, Government's view is that it is necessary to deliver actions in Great Britain to address GB energy security rather than relying on other countries to deliver energy security 'for us'. SoN Section 9.5 provides evidence on how solar and wind generation can work with each other to enhance GB electricity security of supply and meet demand at different times of the year. It is for these reasons that the Government has "committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" (NPS EN-3(2023), Para 2.10.9) SoN Section 7.7 provides an analysis of energy generated per hectare of land by wind, solar and crops for energy.	Government's first duty is to protect its citizens. In the case of climate change its first priority must be to ensure its to ensure that they are protected from its impacts. The potential reduction in emissions from this scheme are globally miniscule and would have no discernible impact on the rate of the impact of global climate change. If our efforts were being matched globally there might be an argument that the reduction in food security was justifiable because it would reduce the climate change impact on food supplies thereby delivering greater food security. However, this is not the case and so it has to be decided whether further reducing our poor food security is outweighed by an insignificant reduction in global emissions. Given the potential to achieve solar

	adaptation and mitigation instead of pretending that we can prevent global climate change. "When a boat is taking on water than faster than you can bail it out, you find your lifejacket and prepare the lifeboats, you don't just keep bailing until you sink unprepared." The renewables industry are masters of selective statistics and have chosen figures for the only renewable technology more land-hungry than solar: growing crops for energy. However, the comparison with wind is grossly misleading because whereas solar takes the whole land area out of its current use, wind turbines are widely spread (to prevent the wake from one turbine reducing the energy reaching another) which allows the vast majority of the land area to continue in its current use. We estimate that solar is about	The analysis concludes that: "large-scale ground-mount solar schemes ... are likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-to-biogas application ... When compared to onshore wind, the energy production from land under solar is of a similar order of magnitude." The first step of NESO's Connections Reform process concluded in December 2025, resulting in a re-ordering of the grid connection queue to prioritise projects to meet government's Clean Power capacity ranges for 2030 and 2035. High level results can be accessed online at https://www.neso.energy/industry-information/connections- reform/connections-reform-results and as amendments to connection agreements are signed between NESO and individual developers, NESO's TEC Register will be updated and further project-specific information will become available 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	targets within the built environment, we suggest that the reduction in food security outweighs the climate impact of this scheme. It is regrettable that the government no longer has a single department that is responsible for addressing climate change and that DENZ only considers net zero. Our view is that surviving the seemingly inevitable impacts of climate change is far more important than achieving net zero.

	750 times more land-hungry per MWh than wind. It is true that the government see wind and solar as the main sources of renewables. However, they are both intermittent technologies and require support within the grid if we are not going to experience blackouts. For this reason, there are specific targets for the different technologies and solar targets are not looking under threat. Furthermore, there is ever-growing installation of solar within the built environment which reduces the need for agricultural land, particularly BMV, to be taken out of production for ground mounted schemes. Wind, particularly high capacity factor offshore wind, has to be the backbone of renewable generation because of its ability to deliver electricity in a way that more closely matches the needs of the grid.		

	Solar, with its seasonal levels of generation being the inverse of seasonal demand, is the weakest contributor to a secure and reliable grid. The proposed battery backup does not make it a reliable form of supply because the stored capacity from the scheme could not deliver its 500MW output overnight even in peak summer generation periods. Solar is definitely a part of the mix for a net zero grid. However, it can only play a minor role because of the limitations identified above. It is best deployed within the built environment where the UCL study that CPRE commissioned shows targets could be met without sacrificing valuable agricultural land. All the Applicant's arguments do not address the core concern: that it is impossible to reliably predict how climate change will		

	progress and how national priorities will change over the next 10 years, let alone the next 60. Committing a valuable and flexible land resource for such a long period would be irresponsible and certainly not in the national interest. If ground mounted solar is still considered desirable at the time of repowering, then permission could readily be extended. It should be remembered that schemes have progressed with just a 25-year permission so a 60-year permission should not be necessary. The fact that other schemes (some of which were recommended for refusal) have been granted long permissions is no reason to do the same.		
CPRE-006	The scheme would reduce emissions from electricity generation but in a global context the saving would be insignificant. Furthermore, there are already more solar schemes in the planning system and	The Climate Change ES [APP-044] chapter supports the comment that the scheme would reduce emissions from electricity generation. Section 3.9 of the Statement of Need [APP-556] explains that reducing GB electricity system emissions to below 50g/kWh while growing GB-based electricity supplies is a	See the above comment. We acknowledge that the scheme would deliver carbon reductions and is not an undeliverable scheme. Nevertheless this does not

	because of the limited capacity to accommodate solar into the grid, there are other less harmful schemes that could deliver the same savings. As previously explained, because of its limitations there is a limited capacity for the grid to absorb solar schemes and so this scheme is one of many that could combine to meet the target. Storage certainly mitigates the intermittency of schemes but it does not necessarily have to be co-located with solar schemes to do so.	key part of Government's plan to deliver a clean power system and net zero by 2050. Section 6.3 of the Statement of Need [APP-556] explains that although lists and registers provide important evidence towards current and future generation capacities, the listing of a scheme on any grid connection register, a planning database or a commercial contract register does not guarantee that the scheme will come forwards. 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-556] expands on the benefits of co-locating storage with solar schemes and explains that 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.	mean that its numerous harms are justified especially as there are alternatives that would meet targets.
CPRE-007	As stated elsewhere the weaknesses of solar mean that it can only play a small part in the grid. The current rate of deployment is currently delivering significant capacity and it is unwise to indiscriminately approve schemes based second-guesses.	Government has explained that it is "committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector". (EN-3(2023), Para 2.10.9). The Government's Clean Power 2030 Action Plan establishes capacity ranges to guide the development of	The UCL report showed that the government 2050 target for solar can be met without the need for solar farms. The report acknowledges that it is likely that some solar farms would be required to meet the 2035 target because of the rate of require deployment.

	Wind farm developers made similar arguments about urgency yet targets were reached many years in advance.	clean energy supplies to deliver a clean energy system on the way to achieving net zero carbon emissions by 2050. However, the Government is clear that its plan retains optionality because it is not clear which of the many scenarios of technology deployment will be achievable. Therefore the Government will regularly review the capacity ranges and this will drive iterations in the prioritisation of schemes for connection, across all clean power technologies. Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure, available at https://www.gov.uk/government/consultations/planning-for-new-energy- infrastructure-2025-revisions-to-national- policy-statements/outcome/2025- revisions-to-national-policy-statements- government-response-accessible- webpage, that: “Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals”. Therefore, Government does not seek to constrain ambitious deployment of clean energy technologies and indeed, the Government is “expecting an increase in planning applications with the Clean Power 2030 target” (CP2030, p55) Bringing forward large capacities of schemes also means that there are options which encourage competition between schemes at later stages of project development, e.g. contract award. Further, some projects may not make it to fruition. Projects may fail at all stages of	However, rooftop solar is being deployed at a higher rate than was anticipated which reduces the amount of ground mounted schemes that would be necessary to meet that target.

		development, and NESO have previously stated that only 30-40% of projects in a queue succeed. The projects that NESO have prioritised for connection before 2030 and 2035 are not guaranteed to deliver merely because they have been prioritised. For these reasons, it is not government's intention that project approvals should be limited by the capacity ranges, or by NESO's prioritisation, because capacity ranges and progress towards them may change in future years.	
CPRE-008	Our comment was only introductory	The Applicant notes this comment.	
CPRE-009	These comments do not challenge the figures presented by CPRE. On the contrary, they lend additional weight to the importance of considering the "decarbonised" figures because they account for the transition from fossil fuels to electricity. The important take-away from the CPRE figures is that the **Decarbonised total energy footprint** total of 6,900 homes is remarkably close to the number of homes in the villages that would be so badly impacted by the scheme. As noted in CPRE-005	The Applicant refers to Section 9.5 of the Statement of Need [APP-556] which provides evidence that developing projects with generation profiles which are complementary to each other (including solar, wind and flexible assets) can deliver adequate and secure electricity supplies in GB. In particular, Figure 32 of the Statement of Need shows how GB solar and wind generation complement each other seasonally to meet anticipated demand. The Government has confirmed that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" (EN-3(2023), Para 2.10.9). The Scheme is a large scheme which over the course of one year will generate an amount of electricity which is equivalent to the annual energy consumption of approximately 115,000 homes. The Scheme will connect to the National Electricity Transmission System, enabling an unencumbered and efficient transfer of bulk power	It has now been acknowledged that renewables alone cannot deliver a secure supply and that firm backup is required including gas. Applicant's assertion that "The Scheme is a large scheme which over the course of one year will generate an amount of electricity which is equivalent to the annual energy consumption of approximately 115,000 homes" is completely false. The scheme would be capable of generating the amount of

	solar is a very land-hungry source of energy.	across the country, in order to provide electricity wherever it is needed. The low-carbon electricity generated will be able to power homes, vehicles, offices, shops, and factories, both locally and nationally. The Applicant acknowledges the table in CPRE's written representation [REP1- 246]. This seeks to estimate the number of homes that would actually be supplied by the energy generated by the Scheme, once domestic properties have been fully decarbonised.	**ELECTRICITY** that is **CURRENTLY** consumed throughout the year by 115,000 average homes. It would not produce the electricity to match the seasonal demands of those homes.
CPRE-010	We acknowledge that BESS play a useful role in balancing the grid. but highlight that the BESS cannot bridge the periods during which solar cannot be generating.	The inclusion of a storage facility as associated development to the main solar scheme allows the Scheme to support the transition to net zero by providing flexibility to a fully low carbon electricity system. For example, storing solar energy in the co-located batteries during periods of abundant solar supply, until it is needed. Section 7.9 of the Statement of Need [APP-556] provides figures to illustrate different ways a co- located solar and storage scheme may operate together to meet system needs	We do not deny that the battery storage would be able to store excess generation capacity for long periods. However this is misleading because in practice it would only be expected to provide output for between ½ to 4 hours. It would certainly not last overnight.
CPRE-011	In other words, the Applicant acknowledges that they have not considered that the scheme will displace food production and that it is likely to cause biodiversity loss where alternative land is brought into use.	The land will not be entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. In addition, 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 able to continue in unrestricted agricultural use after decommissioning.	Sheep grazing in solar farms is the exception and not the rule and so under the Rochdale envelope it must be assumed that it would not take place. The 0.027% figure is current and is based upon government data on the UK's total ENERGY consumption.

	By coincidence the amount of energy generated that would be generated by the scheme would equate to approximately 0.027% of the current UK energy consumption. If the food loss is to be considered as not significant in a national context, then so too must the contribution to energy generation from the scheme. However, only 20% of agricultural land is classified as BMV the loss of BMV would be more like 0.036%.	The Applicant respectfully disagrees with the comment that the Proposed Development would generate only c. 0.027% of the current UK energy consumption. The Scheme is a large scheme which over the course of one year will generate an amount of electricity which is equivalent to the annual energy consumption of approximately 115,000 homes. The Scheme will connect to the National Electricity Transmission System, enabling an unencumbered and efficient transfer of bulk power across the country, in order to provide electricity wherever it is needed. The low-carbon electricity generated will be able to power homes, vehicles, offices, shops, and factories, both locally and nationally.	See above regarding the incorrect claim regarding 115,000 homes
CPRE-012	We do not disagree that the greatest risk to food security is climate change and that it is vital that the UK works with partners around the world to reduce global emissions. However, the woeful lack of global action means that food security is at increasing risk in the UK making it more important than ever to improve our poor food security. By coincidence the amount of energy generated that would be	As set out in the Solar Misconceptions section of the Solar Roadmap (DESNZ, June 2025), "the biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly". Food security matters are addressed in the Farming Report [APP-571] especially chapters 6 and 9. There has been no indication from Government since that report was drafted in May 2025 to suggest that there is an increasing risk to food security in the UK such that there should be a change in policy.	See above regarding the balance between food security and carbon reductions.

	generated by the scheme would equate to approximately 0.027% of the current UK energy consumption. If the food loss is to be considered as not significant in a national context, then so too must the contribution to energy generation from the scheme. However, only 20% of agricultural land is classified as BMV the loss of BMV would be more like 0.036%.		
CPRE-013	We note the figures but also note that the number of "not significant" impacts nationally mount up just as the amount of small amounts of renewable generation have mounted up.	The 1200 ha land for the proposed Sites represents only 0.01% of 16.8 million hectares of the utilised agricultural area in the UK therefore it is not considered to have a significant impact on national food production and security. NESO's Future Energy Scenario 2024 estimates that the UK will require 72- 108GW of solar by 2050. Estimating conservatively that this is all ground- mounted at the maximum typical land requirement of 1.6 hectares for each MW of installed capacity, this would require a cumulative total of 115,200-172,800 ha, which is 0.69-1.03% of the agricultural land in the UK.	The important statistics are proportions of BMV and arable land which we presented. We are not surprised that the Applicant prefers to use this selective statistic. We note that the Applicant acknowledges that the land take for this scheme exceeds the normal amount anticipated.
CPRE-014	By their very nature, recreational routes are chosen because of the enjoyment derived from using them. The routes may well not	The Applicant has assessed the likely impacts on PROWs and recreational routes affected by the Scheme at ES Appendix 17.1: Tourism and Recreation Receptor Tables Revision A [REP1-079]. Consideration of the impact on	We maintain our view.

	be extinguished by the scheme, but the attractiveness of using them would be substantially diminished making it likely that they would largely cease to be used. During construction, replacement and decommissioning there are likely to be periods of disruption and interruption in their availability.	desirability of the affected route has been central to the assessment of likely effects. The Applicant understands there will be some disruption to PROW and recreational route users as a result of construction, replacement activities, and decommissioning, and has set out the mitigation measures in the OPROWPPMP [REP3-067] to minimise these as much as feasible. These measures are secured by Requirement 18 of Schedule 2 to the Draft DCO Revision C [REP3-024]. The assessment of likely effects to PROWs finds no significant adverse effects at any phase of the Scheme to any individual PROW, or the local PROW network overall. That notwithstanding, the assessment of likely effects to long- distance recreational routes does find significant adverse effects at all phases of the Scheme. This increased significance of effect (compared to PROWs) is due to the regional or national importance of long-distance recreational routes. Therefore, when assessing these routes, this has increased their assessed sensitivity to changes as a result of interaction with the Scheme.	
CPRE-015	The government's "Land Use Consultation" was roundly criticised for its lack of rigour and thankfully seems to have disappeared without trace. The expectation expressed that improvements in agricultural productivity would offset land loss was particularly challenged	The Government's responses to the Land Use Consultation are not yet published, and so cannot be commented upon. There are many factors influencing the UK's cereal production. Defra's statistical publication Cereal and Oilseed Production in the UK 2025, updated 12 December 2025, records that in 2025 wheat production was up 7.3% on 2024, barley was down about 10%, and oats were down 2.3%. Defra's statistical publication Agricultural	The length of the delay in publishing that consultation responses usually indicates that they were not favourable. We consider that no weight can be given to the document. We do not accept that replacement cereal can be

	because productivity is reducing because of environmental measures such as the use of fewer inputs such as fertilizer and crop sprays and the impacts of climate change. Last year the UK had the worst harvest for many years which should be taken as a warning that should be heeded. If the replacement cereal is to be grown in the UK it is inevitable that additional land will have to be converted to intensive agriculture.	Land Use in the UK 2025, updated 17 December 2025, recorded the area of uncropped arable land at 576,000 hectares, approximately 12% of arable land. Climatic factors such as the weather, the area and type of crop planted influenced by world prices and factors such as disease risk, and the influence of Government policies such as payments for agri-environmental, non-food uses, all influence the area and yield of the crops grown in the UK. Insert from Cereals and oilseed production in the UK 2025 Yields were generally down from 2024 for a number of factors including the weather. The graphs show that yields and overall production varies year to year. As noted, about 12% of arable land is not currently in production. The influence of solar development on the overall production is minimal. It is not inevitable that additional land will have to be converted to intensive agriculture, as the CPRE claim, to increase cereal production.	produced without bringing replacement land into production unless it is imported.
CPRE-016	This does not address the omission of some of our PEIR comments from APP-035. This was too little too late and does not explain the unnecessary complexity of the presentation of the application.	The Applicant organised an orientation meeting on the landscape documents on the 13 November 2025 following Issue Specific Hearing 1. Invites were sent to Stop Green Hill Solar and local representatives of those who attended Issue Specific 1 (Grendon Parish, Bozeat Parish, Mears Ashby Parish, Earls Barton Parish, Cogenhoe & Whiston Parish, and Holcot Parish.)	CPRE were not invited.

	It would have been useful to have received an invitation to the orientation of for a recording to have been made available.		
CPRE-017	The Applicant has not addressed the disparity between their methodologies and those used for the Tillbridge scheme. We are not alone in considering that the Applicant's LVIA consistently understates the level of impacts to favour the scheme.	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 [APP078 & APP079], which has been progressed and agreed with the Local Planning Authorities. 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 conforms to the landscape Institutes GLVIA3 has been progressed and agreed with the Local Planning Authorities	We note that the Applicant acknowledges that their methodologies differ from those used by the Applicant at Tillbridge and they do not challenge our assertion that the differences favour their scheme.
CPRE-018	We are aware of the process and also aware that officers seldom have the time to verify all the viewpoint locations and accept	The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation. Viewpoint	This does not answer our point

	ones proposed with a credible rationale, particularly dual-purpose viewpoints.	photography and photomontages are included within Figure Series 8.14 [APP-334 to APP- 400]	
CPRE-019	If Winter Year 1 and Summer Year 15 representations are industry standard then they do not show the mature screening worst case. Under the Rochdale envelope the Year 1 winter photomontage must therefore be used to assess the Year 15 winter impact. Since the LVIA assumes that by Year 15 the screening completely conceals the development this cannot be the case. The majority of the remaining photographs do not give sufficient information to be able to identify the location and extent of the panels. The worst case depends upon the direction from which panels are viewed. Presenting the panels as modelled shows the maximum height, but presenting the panels face on does not.	The LVIA considers that the worse case scenario is considered to be Year 1 Winter. At this point the proposed landscape mitigation planting would have just been planted and therefore at its smallest (in height, girth, canopy spread etc..). Additionally at this point the proposed changes to hedgerow management as set out within the OLEMP would yet to have allowed the hedgerows to have reached their target heights of between 4 – 4.5m. Winter months are also the moment of the year where the landscape is at its most open allowing greater visibility across the countryside. The visualisations have been produced with the panels positioned at full tilt facing east. This creates a worse case demonstration of the position of the panels, as in actuality, tracker panels would only be in this position first thing in the morning as the sun breaks the eastern horizon. The panels are shown consistently in this position regardless of the juxtaposition of the viewpoint to the array to allow continuity of representation.	This does not address the lack of a mature winter impact or that the worst case is when the panels are not viewed face on.

CPRE-020	The LVIA places undue weight on the landscape fabric and the mature scheme giving the impression that the initial 15 year period is not significant and that thereafter the planting solves all issues. It acknowledges change to the landscape character but we consider that throughout the LVIA the adverse impact is understated.	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. 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. 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. 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."	
CPRE-021	As previously stated we do not consider the Cumulative Sequential Visual Impact	The LVIA [APP-045] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual	As stated elsewhere, the Applicant does not seem to understand that it is not

	Assessment is either thorough or robust. The GLVIA 3 Table7.1 does not state that **ONLY** major roads and popular paths should be assessed but cites these as examples of regularly used routes. Many local roads are also regularly used both for village residents to access work or facilities and also as alternative routes used to avoid traffic. The only way that these roads cannot be considered to need assessment is if the Applicant considers that the whole of the landscape covered by the scheme as being wholly within solar farm infrastructure.	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 this includes a detailed assessment of all visual receptors including all roads and PRoW within the 2km Study Area	necessary to experience concurrent visibility for there to be a cumulative sequential impact.
CPRE-022	Best practice requires that micro-siting should be used to avoid foreground clutter.	The locations of the viewpoints have been subject to consultation with the relevant consultees and planning authorities under Section 42 Consultation.	Micro-siting refers to small changes in the position of the camera at the viewpoint, not using a different viewpoint.
CPRE-023	These would have saved a lot of work when preparing the written representation but so late in the	The Applicant notes this comment.	

	process they are too late to be of benefit to us. Bare earth ZTVs do over-represent visibility but augmented ZTVs are notorious for under-representing visibility because they assume that all features of a certain type are impenetrable and of a certain height across their mapping footprint. If views are predicted on an augmented ZTV they are extremely likely to exist.		
CPRE-024	We maintain that the study areas are unduly restricted in particularly where it applies to cumulative sequential visual impacts. The size of the study areas is less than the sizes used in other applications	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 [APP078 & APP079], which has been progressed and agreed with the Local Planning Authorities, this includes the identification of the Study Area for the LVIA.	We maintain our view
CPRE-025	See CPRE-020 above. The assessment does not adequately assess the even the A roads and does not assess local roads that are regularly used routes.	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, this includes a detailed assessment of all visual	We maintain our view.

		receptors including all roads and PRoW within the 2km Study Area.	
CPRE-026	The ES does not adequately assess the regularly used route along the A509 between Olney and Wellingborough but only a very limited section of the route. It omits the two solar schemes at Great Doddington and Little Irchester which are very visible on this route and only a 5 minute drive on the A509 from site F. We have requested that the Examining Authority should travel this regularly used route on a major road.	The A509 London Road is included within the LVIA assessment as receptor TR014. Receptor TR014 extends north from the roundabout junction with the A428, to Wollaston at which point it exits the Study Area. The assessment of effects to users of TR014 includes an assessment of visual effects associated with Cumulative Sites and identifies sequential visibility between Green Hill G and Green Hill F. It is important to note that at no point for users of this section of highway would Green Hill F and G be seen in combination. The LVIA identifies Moderate / Minor Adverse effects to users of this section of highway during Construction and Year 1, reducing to Minot / negligible at Year 15 and at Decommissioning. The two solar schemes at Great Doddington and Little Irchester are located outside of the visual study area.	This assessment covers an inadequate journey because the study area is inadequate.
CPRE-027	We assume that the Applicant does not contest that these receptors would experience significant sequential impacts from the different elements of the scheme	The Applicant maintains the conclusions of the LVIA [APP-045] and refers to the findings contained within 6.3.8.3A Environmental Statement Appendix 8.3 ES LVIA Assessment Sheets (Revision A) [REP-041	We maintain our view
CPRE-028	We assume that the Applicant does not contest that receptors on this route would experience very significant sequential	The Applicant maintains the conclusions of the LVIA [APP-045] and refers to the findings contained within 6.3.8.3A Environmental Statement Appendix 8.3 ES LVIA Assessment Sheets (Revision A) [REP-041].	We maintain our view

	impacts from the different elements of the scheme		
CPRE-029	We defer to wildlife consultees over wildlife matters but remain very concerned about the potential for contamination of FLL and the Nene in the event of a battery fire.	The Applicant notes this comment and would refer the consultee to the Outline Battery Storage Safety Management Plan (Revision A) [REP1-143], which details how the risk of a battery fire will be minimised, and which mitigation measures will be implemented in the unlikely event of a fire.	No further comment
CPRE-030	We agree that the impact upon these villages could be worse had there not been such a large land take for the scheme. However, although the scheme has been set back from these settlements they still have to be accessed by passing through or by solar infrastructure. This creates an industrialised context for these villages and represents a significant adverse impact upon their character and setting.	The Scheme design has been established to minimise impacts to Conservation Areas. Attention has also been made to the kinetic experience to heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). With regard to the Mears Ashby and Easton Maudit Conservation Areas, where an impact was identified, solar panels have either been removed (i.e. Fields EF9, EF16, EF34, FF9, FF13, FF14, FF16 and FF22) or offset (Fields EF5, EF10 to EF15, EF17, EF23 and EF33, FF11, FF15, FF19 and FF26) away from Conversation Areas and their approach roads. Enhanced screening of existing hedgerow and tree belts has also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Areas. ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has identified a moderate adverse effect would occur as a result of the	We do not accept that the separation is sufficient to address the harm to the setting of the settlements.

		Scheme to the Mears Ashby and Easton Maudit Conservation Areas. The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels.	
CPRE-031	Construction traffic will inevitably have an impact on local roads that they use. Although in some cases volumes may be low, they will not be predictable and so it would not be possible to plan recreation to be timed avoid it. The need for Link 81 is disputed as unnecessary and we await the Applicant's justification for its use.	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 which requires specific access to this area of Green Hill F and will therefore be needed during the maintenance phase in addition to the construction phase	This misses the point that non-motorised users can only guarantee the safe use of these routes by avoiding them during working hours.
CPRE-032	In our comment we were highlighting that other applications contain appendices giving evidence and do not rely on consultees accepting the Applicant's word that the measurements were taken to standard. It is not unusual in applications for there to be	Measurements were taken in general accordance with BS 7445-1:2003 The Description and Measurement of Environmental Noise: Guide to quantities and procedures. Noise survey results are presented under Section 14.6 of Chapter 14: Noise and Vibration [APP-051].The methodology for the assessment is outlined in section 14.4 of Chapter 14: Noise and Vibration [APP-051] with any assumptions and limitations outlined in section 14.5	The Applicant is suggesting that we should accept their word having omitted to submit the evidence. This is not acceptable.

	disparities between the reported findings and the data upon which it is supposedly based. It is usual to be expected to take the Applicant's word that surveys have been carried out correctly.		
CPRE-033	Under the Rochdale envelope it is neither appropriate nor acceptable to carry out noise modelling using the most favourable ground absorption factor (G=0.8 - soft ground). The times when noise would be likely to cause the greatest nuisance would be on hot days during the summer where the ground will be hard and residents will be enjoying their outdoor space or have their windows open for ventilation. Suggesting that modelling using soft ground should be acceptable casts further doubt on the reliability of the assurances that measurements have been carried out according to standard.	The ground absorption factor in the model is considered reflective of the ground conditions of the Sites which is the predominantly agricultural land. 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. The modelling results were informed by manufacturers data. 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.	The ground conditions in summer and winter can be hard and so this does not conform to the requirements to model the worst case.

CPRE-034	The wording within the Glint and Glare assessment implies that this has only been assessed for horse facilities and not for routes used by equestrians. Can this be confirmed? The BHS is not an expert on glint and glare and neither are equestrians required to report horses reacting to it. It is perhaps likely that the level of incidents might be low because riders choose to avoid routes that pass through or by solar farms in favour of more pleasant scenery and making it unusual for horses to encounter them. The BHS guidance contains the following considerations that should be taken into account as they are relevant to this scheme: • Constraining width of bridleways or byways can feel intimidating with the loss of adjacent open space.	As summarised in ES Chapter 15 Glint and Glare [APP-052], Public Rights of Way were considered within the Glint and Glare Assessment. This included all users, including equestrians. The Applicant notes the British Horse Society Guidance. With regard to Glint and Glare, the Applicant notes the following: "The Society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses. Reports from sites with both solar panels and horses, including a solar array beside an arena used for riding horses, indicate no reflection and no reaction from or impact on horse or rider. Horses may react to a new solar structure as they might to anything different in their environment, but will quickly accept it (when introduced appropriately). Such reaction is simply to a change in their surroundings, it is not likely to be a response to reflection because their handlers report no reflection from panels. Although horses' vision is different from humans, their response does not suggest that they see panels differently." The Applicant considers potential impacts of glint and glare towards the Three Shires Way within the Glint and Glare Technical Note [REP2-054]. 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 layout of the Scheme has been partially derived through the use of a series of buffers, this includes an	Our concerns are not addressed by this response.

	• Inverter buildings near rights of way should be constructed to minimise transfer of sound. • Tracker arrays should not be adjacent to bridleways or byways until their noise and movement can be assessed for impact in mature developments. • If bridleways or byways are alongside or through sites, care must be taken not to create a narrow corridor. Fencing can be intimidating, especially at this height, and create a need for vegetation control, or, if solid, create a drainage or poached surface problem by preventing light and air reaching the surface. A narrow corridor may also potentially create conflict from users being confined, with no 'escape space' from a threat as would be the case with an open field. The need to maintain adjacent hedges and surface vegetation so as not to further reduce the available width should also be considered, as	offset of 15m to the fenceline from all PRoW and then a further 4m to the proposed panels, including the section of the Three Shires Way (TP217) that passes through Site G. Hedgerow planting is proposed along the length of the route to help screen views of the array whilst providing an attractive green corridor for users to pass along.	

	well as vehicular access for maintenance if appropriate. These considerations are of particular concern at Site G which is adjacent to the Three Shires Way long distance bridleway and a vital resource for clients of Lower Farm Stables and other equestrians in Lavendon. The bridleway is constrained on the eastern side by a ditch and woodland or hedgerow but currently open towards Site G. The BHS recommend that tracker panels should not be used adjacent to bridleways and that the minimum unrestrained width of the bridleway should be at least 5m if not more given the current openness of the site. During wet periods sections of the bridleway already become extremely muddy. The planting proposed would inhibit light and air reaching the surface of the		

	bridleway potentially making it even more muddy if not impassable. The BHS advice has brought to light a particular concern for the viability of equestrian businesses where it states that "Horses may react to a new solar structure as they might to anything different in their environment, but will quickly accept it (when introduced appropriately)." Although this might sound reassuring it places a huge barrier to client recruitment. After all, why would a client choose to stable their horse where it has to be carefully introduced to a hazard when there are alternatives that have no such restriction?		
CPRE-035	The Applicant's response is effectively completely dismissive of glint and glare yet there is a requirement for an ES to contain a glint and glare assessment.	The Applicant notes this comment, and refers to the British Horse Society (BHS) guidance on impacts of glint and glare which states that "The Society has no evidence of 'glint and glare' from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses." (solar-0825.pdf).	See comment above regarding the BHS comment.

	The particular issue with horses on bridleways is that they may perceive glint as movement and a threat and bolt. The brightness of glint is not a factor to it being perceived as a threat, merely its presence in their eyeline. A bolting horse is a danger to its itself, its rider and any other user of the bridleway. Because the scheme security fencing would normally contain a bridleway, this increases the danger because the horse's escape routes are restricted.		
CPRE-036	There is great public concern about the hazards from a BESS fire and it is very concerning that the Applicant is so resistant to setting out measures that would reassure the public. The ES does not model a prolonged fire as occurred in Liverpool and so cannot be considered to have addressed the worst case as suggested.	The Applicant has thoroughly addressed all requisite BESS failure safety issues in the both the Outline Battery Storage Safety Management Plan (Revision A) (OBSSMP) [REP1-143] and Plume Study BESS Fire Emissions Modelling Report [APP-167]. 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 case weather conditions recorded over a five-year period. The Liverpool BESS fire referenced was a 59-hour event which was very prolonged event because water was	This response is not reassuring because it relies upon the "rapid dispersion of toxic gasses in outdoor BESS fires" which would not occur in all weather conditions such as during a temperature inversion. The reassurance based on off-site risks at other fires cannot be relied upon because those sites may be further from

	Because of the unusual proximity of the BESS to the village of Grendon and other individual properties we feel that it essential that the DCO is not made without at the very least having a draft evacuation plan in place. This would be consistent with the Rochdale envelope by covering off the worst case scenario.	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 and is not a relevant example to use for a plume study. 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 Plume Study assesses the battery fire emission impact in ten worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area. The Plume Study considers all toxic emissions at the peak of a BESS fire, all emissions at receptor locations were below all relevant public health exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out). 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.	residences than the Green Hill site. The Emergency Response Plan must specify how the availability of tankers that would be required for the removal of polluted water can be guaranteed before the storage capacity is exceeded.

		The Applicant's Plume study has already demonstrated that there will be no significant off-site BESS fire impacts on sensitive receptors, and there is no credible fire scenario which would require an evacuation plan to be drafted. 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. 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.	
CPRE-037	This response ignores the fact that the detrimental impact on the experience of using PROWs would deter their use regardless of their availability. This is indirectly acknowledged in the predicted loss of employment in leisure.	The Applicant has assessed the impact of usability and user experience and desirability in its assessment of impacts to PROWs in ES Chapter 17: Socio- Economics, Tourism and Recreation [APP-054] and its appendix (Revision A) [EX1/GH6.3.17.1_A] This has been used to predict likely economic impacts on tourism and leisure as a result.	We are pleased that this acknowledges the impact.
CPRE-038	As stated in our representation, construction jobs are short-term and are anyway unlikely to	The Applicant has assessed construction jobs as medium-term and temporary as they are to be present over a	We are please that this acknowledges the loss of local

	create significant employment locally. It is important to note that only 8 of the 15 FTE jobs created are anticipated to be created locally. This does not even replace the jobs lost in agriculture, let alone those lost in leisure.	period of approximately 2 years, where the categorisation of medium-term is 1-5 years. The Applicant has furthermore stated that opportunities to improve local employment opportunities available through the Scheme, or to provide retraining support for those displaced by the Scheme are set out in the OSSCEP [APP-552], which is secured by Requirement 20 in Schedule 2 to the Draft DCO Revision C [REP3-024]. These measures include all phases of the Scheme, not just construction. The Applicant has assessed the Scheme as likely to generate a net loss in FTE jobs during operation. Hence, the assessment in ES Chapter 17: Socio- Economics, Tourism and Recreation [APP-054] finds a long-term minor adverse (not significant) to economic activity and employment.	employment that would result from the scheme.
CPRE-039	The Applicant does not deny that they predict a net loss of local employment during the operational phase due to job losses in both agriculture and leisure which outweigh the jobs created to maintain the scheme. Does the Applicant propose a compensation scheme for business that are forced to close?	Voluntary agreements are in place for agricultural businesses and landowners directly affected by the Scheme. The Applicant is not proposing a compensation scheme for businesses indirectly affected by the Scheme. That notwithstanding, the OSSCEP [APP- 552], which is secured by Requirement 20 in Schedule 2 to the Draft DCO Revision C [REP3-024], will target local employment and retraining opportunities for those most greatly affected.	The scheme would cause a significant loss of business or even closure of other businesses without compensation. It is unacceptable that the businesses would not be compensated. Equestrian business are particularly at risk.

CPRE-040	As stated in our representation, the ground rent would predominantly be received by absentee landowners and not enter the local economy. The OSOCEP only outlines possible activities and not any commitments. Unless there are commitments built into the DCO there is no guarantee that any measures will materialise.	The Applicant refers back to its comments made at 'CPRE-038' in Applicant's Responses to Written Representation [REP2-048]. The measures set out in the OSSCEP [APP-552] are secured by Requirement 20 in Schedule 2 to the Draft DCO Revision C [REP3-024], which legally requires a full Skills, Supply Chain and Employment Plan substantially in accordance with the outline version to be approved by the local planning authorities prior to commencement of construction.	Our comment stands. Our comment is that the OSOCEP does not make specific commitments.
CPRE-041	As stated in our representation we consider that the Applicant understates the level of impact.	The Applicant refers back to its comments made at 'CPRE-039' in Applicant's Responses to Written Representation [REP2-048].	We maintain our position.
CPRE-042	This response and the Applicants assessment in the ES are not credible. Walkers choose routes that are attractive, tranquil and offer open views. They will not return to PROWs that are have been industrialised by solar infrastructure that creates noise or choose paths that are contained by screening. They will either seek alternative walks elsewhere or, in the worse cease going for walks. This will	The Applicant refers back to its comments made at 'CPRE-040 in Applicant's Responses to Written Representation [REP2-048]. The Applicant has acknowledged that the Scheme may dissuade users from PROWs and this will have an effect on physical and mental health due to changes in access to open space, leisure and play. The Applicant is confident that the assessment outcomes reflected this, and resultantly ES Chapter 18: Human Health [APP-055] finds a medium-term temporary minor adverse effect during construction, and a long-term minor adverse effect during operation. These effects are not significant.	We maintain our position.

	inevitably be harmful for health and wellbeing.		
CPRE-043	This response does not explain why the scheme has such a large land take in comparison to other schemes. The fact that it is predominantly BMV land exacerbates the wasteful nature of the design. Site F is particularly bewildering because the areas of panels are scattered around the site.	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 [APP- 041]. 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 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.	We note that this acknowledges that the land take exceeds the maximum anticipated in NPS EN-3.
CPRE-044	The figures given by the Applicant show that grazing on solar farms is the exception and not the rule. Under the Rochdale envelope it must be assumed that grazing would not occur. The vast acreage of the scheme also raises questions about what size flock would be required to	In the Farming Report [APP-571] at paragraph 9.31 (v) it is recorded that in June 2024 some 3,600ha of solar panel areas on farms were grazed and 3,700ha were not. 2024 was the first year that Defra had collected the information as part of the June Census. Defra has again collected this information for the 1 June 2025 Census, and again this is for land that is part of a wider farm business and so does not collect data for all solar farms. On 1 June 2025 some 4,937 ha (52%) of solar farm land within the survey was being grazed (Ref 1.1).	We welcome the acceptance that mowing should be assumed as the worst case.

	fully utilise it, whether enough shepherds could be recruited to manage them and whether such a large number of sheep would be marketable.	In order to ensure the realistic worst case has been assessed, the Environmental Statement assumes that mowing will be utilised. Long term management is outlined in the Outline Landscape and Ecological Management Plan [REP3-062].	
CPRE-045	We do not find this response credible. The key destructor of soil quality is compaction as recognised in the Blackberry Lane decision. Compaction harms the texture and decreases drainage leading to increased wetness. The management of the wildflower areas requires that the nutrient levels should be kept low by removing organic matter and so it is hard to see that these could be improved by organic matter. We have also seen concern raised that panels leech contaminants into the soil which could make it unusable for agricultural purposes.	The benefits to soils, especially topsoil, from being rested from intensive arable use are set out in the ES Chapter 20 Agricultural Circumstances [APP-057] and the Farming Report section 7 [APP- 571]. Compaction during construction and decommissioning will be limited by following good practice as stated in ES Chapter 20: Agricultural Circumstances [APP-057] and Outline Soil Management Plan [APP-550] (as secured by Requirements 21 and 19 of Schedule 2 to Draft Development Consent Order Revision A [EX1/GH3.1_A] respectively), as can be controlled by condition, and because the machinery involved is generally smaller and lighter than that used in modern agriculture in any event. There have been many decisions since the Blackberry Lane decision that have recognised that the land will not be adversely affected or downgraded. As stated in Outline Soil Management Plan [APP-550] and ES Chapter 20: Agricultural Circumstances [APP- 057], soils will be reconditioned to eliminate compact during soil reinstatement and there is a period of soil aftercare to check the reinstated soils by qualified Soil Scientist to ensure that soils are restored correctly, and any required remediation implemented.	Our observation of construction of solar farms mean that we have to agree to disagree.

		As set out in the Farming Report [APP- 571] at paragraph 7.6 (viii) the conversion of arable land to grassland has the biggest impact on soil organic carbon levels. Removing the cut matter, as happens when land is used to make hay or silage, will not negate the benefits to soils. We are aware of no research to indicate that contaminants leech from panels.	
CPRE-046	This response does not address the fact that the likelihood of a fire increases in proportion to the number of BESS units at a location. It is a simple case of basic statistics. If the risk for a 1MW unit is ***x*** then the risk for 600MW of units is ***600x***.	The Applicant emphasises that BESS are not inherently unsafe, therefore the likelihood of fire is not solely predicated by the number of BESS units within a BESS site. The safety risks of BESS are now well established; the Electric Power Research Institute (EPRI) established the BESS Failure Incident Database in 2021 to collect and share data on BESS fire and failure events. This database serves as an information resource for both energy storage industry stakeholders and the public and has supported the development and ongoing improvement of BESS safety standards. Statistically, the significant global increase in BESS deployments means that there will be a likely increase in the number of failure events. However, BESS failure rates dropped by 98% from 2018 to 2024 as lessons learned from BESS failure events have been incorporated into BESS design, testing requirements, control and monitoring systems, safety standards, and construction and operations best practices. Electric Power Research Institute (EPRI), Insights from Battery Energy Storage Systems (BESS) Failure Incident Database: Analysis of Failure Root Cause, identified four	We acknowledge that there are other factors that might influence the likelihood of fire but it is undeniable that the number of units is a significant factor.

		primary root causes of BESS failure with the majority occurring in early lifecycle stages i.e. construction, commissioning, or within two years of operation. The Applicant emphasises the EPRI research concluded that the primary cause of failure was rarely the battery cells or modules, and the Outline Battery Storage Safety Management Plan (OBSSMP) [REP1-143] is drafted to address all key safety risk reduction topics to ensure that comprehensive BESS fire and explosion hazard prevention and mitigation strategies can be developed and implemented.	
CPRE-047	This response does not answer the question posed. A temperature inversion is not a typical weather condition but one that would trap fumes where they are produced.	The Applicant acknowledges that temperature inversions can significantly reduce pollutant dispersion, causing emissions to remain concentrated near the ground. The BESS fire emissions modelling (ES Appendix 16.2 [APP-167]) specifically addresses this by using five years of local meteorological data, which includes periods of atmospheric stability, such as temperature inversions, when dispersion is poorest. The highest predicted concentrations from all meteorological scenarios for each receptor are reported, ensuring that the results reflect the worst-case conditions, including when a temperature inversion is present. Therefore, the concentrations reported in Table 9 of ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167] represent the maximum levels that could occur if a fire were to coincide with an inversion.	We welcome this clarification.

CPRE-048	The Rochdale envelope requires that the worst case is used and not the "typical case" which could bear no relation to the BESS that will be deployed. The Liverpool fire lasted 72 hours and should be taken as the worst case. It is not sufficient to calculate the fire water requirements at a later date because it is necessary to ensure that there is sufficient capacity to retain the contaminated water onsite. A further concern is that arrangements for swift removal of the contaminated water should be in place so that there is storage for runoff and the possibility of containing another fire.	The Applicant stresses that there is absolutely no validity to the claim that 24 hours firefighting water supply would be required for any credible BESS failure incident. The Applicant's OBSSMP stipulates that at the detailed design stage BESS site and BESS design principles and ERP content will ensure that NFRS are expected to employ a defensive strategy i.e. only boundary cooling should be employed for cooling of adjacent BESS or associated supporting equipment, this ensures that environmental pollution risks are minimised. BESS enclosures are made of non-combustible materials and incorporate high levels of thermal insulation, to minimise fire propagation risks. Section 5.3.2 of the OBSSMP stipulates: "A BESS design which may require direct NFRS firefighting engagement tactics will not be selected for this facility". Boundary cooling typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. NFCC guidance states: "If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly." Section 5.3.2 of the OBSSMP specifies that the example design used to inform the ES includes a minimum of two water tanks, each with no less than 230,000 litres (l) of water. This would provide 1,900 litres per minute for approximately 4 hours of water which is approximately	This does not address the concern that it is not intended to calculate the volume of water required at a later date.

		double the 2-hour minimum duration stated in current NFCC guidance and has been agreed with NFRS. Furthermore, as Section 5.3.2 of the OBSSMP outlines: "The BESS scheme will integrate an external firefighting water capture drainage system. In the event of a fire a system of automatically self-actuating valves at the outfalls from the BESS areas will be closed, isolating the BESS areas drainage from the wider environment. Fire water runoff may contain particles from a fire; the runoff must be contained and tested before being allowed to discharge to the local watercourses. The water contained by the valves will be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site (if polluted) or releasing into drainage systems, if safe to do so." The firefighting water requirement will be fully assessed at the detailed design stage based upon based upon analysis of Large Scale Fire Testing (LSFT) of the BESS design plus any additional fire and explosion test data provided by an independent Fire Protection Engineer, water storage volumes will be fully agreed with NFRS. Firefighting runoff containment and removal is not deferred. The OBSSMP commits to an external firewater capture drainage system with automatically self actuating shut off valves at outfalls to isolate the BESS drainage from the wider environment in an incident. Contained runoff will be tested and either released in a controlled	

		manner or removed by tanker for appropriate off site treatment or disposal, in consultation with the relevant consultees. OBSSMP [REP1- 143] and FRA Annex J (BESS) [APP-395].	
CPRE-049	The Applicant's response does not address the issues raised merely seeks to avoid providing an Emergency Response Plan before the DCO is made. Please refer to our comments at CPRE-0034 which also apply to this issue. The specific point about residents at Pastures Farm having to travel towards the fire in order to evacuate has not been addressed.	The Applicant has comprehensively addressed this issue in their response to CPRE-036 above which covers off-site fire emissions impacts on sensitive receptors. 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. ES Chapter 16: Air Quality [APP-053] considers potential impacts resulting from emissions from an accidental Battery Energy Storage System (BESS) fire with modelling outlined in ES Appendix 16.2 BESS Fire Emissions Modelling [APP-167]. In regard to Pastures Farm, this property was included as a receptor in the Fire Emissions Modelling as shown on Figure 16.4 BESS Fire Emissions Study Area [APP-16.4]. All emissions were below AEGL Level 1 (Notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure).	We are not reassured that the impact at Pastures Farm is acceptable.

		All Emergency Response Plans drafted before BESS operations begin will not require members of the public or first responders to pass through any smoke plume. In the majority of credible BESS failure scenarios, the appropriate action for sensitive receptors (including all residential properties) within 1km of a BESS area will be to remain indoors and keep all doors and windows closed.	
CPRE-050	Our comments stand.	The Applicant notes this comment.	
CPRE-051	Although it makes no material difference, we feel that the Applicant has made the inspection of their application unduly difficult and that they have only provided assistance after the time when it would have been useful. It is interesting to again contrast the Greenhill scheme with the Tillbridge scheme. The Greenhill ES has 507 documents and the Tillbridge scheme 179.	The Applicant acknowledges this comment and confirms that efforts have been made to ensure the application documents are as user-friendly and accessible as possible. However, the Applicant notes that the nature of the Development Consent Order application process and the scale of the Scheme inevitably require the submission of a substantial number of documents. The Applicant also confirms that, where possible, information has been structured so as to assist the reader, including the use of separate appendices and standalone documents. This approach is intended to make it easier to locate specific information that might otherwise be contained within a small number of very lengthy documents. The Applicant remains confident in the assessment undertaken and the accuracy of the information provided.	
CPRE-052	The Applicant has stated that they do not intend to retain the scheme for its lifetime. The scheme at Little Irchester was promised a community fund that	The Applicant has set out their position on the community benefit fund in response to 'NNC-085' in The Applicant's Response to the Relevant Representations [REP1 161] and response to 'NNC-002' in The Applicant's	It is essential to ensure that the Community Benefit Fund cannot be detached from the DCO.

	disappeared on the first change of ownership. We consider it essential to incorporate the community benefit scheme into the DCO if it is made. The reluctance of the Applicant to incorporate such a provision into that DCO raises great concern that they intend to allow the same to happen with this scheme because it would increase the value of the scheme to the new owner.	Comments on Responses to ExA Second Written Questions [EX4/GH8.1.27].	
CPRE-053	This response does not address the concern about guaranteeing the funding for decommissioning. Without a scheme that guarantees funding the final owner of the scheme can leave the company with insufficient resources to fund decommissioning and abandon the scheme without consequences by declaring bankruptcy. The reluctance of the Applicant to incorporate such a provision	Please refer to the Applicant's oral submission at Open Floor Hearing 2 as set out in paragraph 1.2.6 in the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP3-129]	It is essential to ensure that the funding for decommissioning is guaranteed..

	into that DCO raises great concern that this is the plan.		

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