

Stop Green Hill Solar 10 March 2026. Prepared for oral submission - (abbreviated) at ISH 5 and submitted as written response to PINS and directly to Green Hill Solar.

## **Queries regarding transport and traffic following updated documents and statements by the applicant during the course of the Examination.**

Stop Green Hill Solar (SGHS) maintains continued and additional concerns over the impact of transport, traffic, site accesses and workers.

It is understood that final transport and traffic plans will only be confirmed should a DCO be granted: however, it remains evident that the impact of traffic, HGVs, machinery movements and the implications of construction will be highly significant - potentially devastating - to communities over two years. It is essential that data should be as accurate as possible now so that it may be materially considered during the Examination, with important aspects written into any DCO granted.

SGHS has continued to track Green Hill Solar's revisions of transport plans and figures, route plans, construction compound locations, site accesses and worker numbers and disputes the all-important accuracy of HGV and traffic forecasts.

## **Comparisons Cottam vs Green Hill Solar**

The applicant states that transport figures are estimated using figures drawn from other solar utilities' transport management plans, such as its own Cottam site, as it has already been granted a DCO and 'does not have any discernible design differences' to Green Hill Solar.

SGHS asserts Green Hill Solar transport/traffic forecasts should be based on the specific scheme, not another Solar utility; however, even comparisons with Cottam raise significant concerns.

**Size:** Cottam is a similar 1,200 hectare-size to Green Hill Solar, over four sites but producing a greater 600 MW, with a similar length cable route.

**Total HGV deliveries:** Cottam 13,010; Green Hill Solar 8,146.

**Total working days:** Cottam 1,977 (not known if BESS included); Green Hill Solar excluding BESS is substantially more at 2,663, and including BESS is 3,023 working days. It is not clear why less working days at Cottam, generate more HGV movements overall.

**Total HGV two-way movements:** Cottam: 26,020; Green Hill Solar 16,292 (Heckington Fen solar, also referenced by Green Hill Solar, estimates 22,164.)

This suggests 10,000 two-way movements less at Green Hill Solar, compared to Cottam.

Note: these figures are only referencing HGV movements and do not include LGV or workers' vehicles.

HGV movement tables below.

Table 4.1 Cottam 1, 2, 3a and 3b: Anticipated Construction Deliveries (HGV)

Construction Activity	Vehicle Size (Max)	Cottam 1			Cottam 2	Cottam 3A	Cottam 3B	Total
Construction Period (Working Days)		529	440	337	251	242	178	529
Modules and Mounting Structures	16.5m Articulated	1,490	990	310	530	660	340	4,320
Conversion Units	16.5m Articulated	30	20	10	10	10	10	90
Access Track	10m Tipper	670	440	140	200	250	100	1,800
General (Fencing, Landscaping, etc.)	10m Rigid	1,280	850	260	480	580	350	3,800
Energy Storage Facility	16.5m Articulated	0	0	3,000	0	0	0	3,000
Total		3,470	2,300	3,720	1,220	1,500	800	13,010
Average per Day		7	5	11	5	6	4	38
Total Movements (Arrivals + Departures)		6,940	4,600	7,440	2,440	3,000	1,600	26,020
Average Movements per Day		14	10	22	10	12	8	76
Average Arrivals per Day (Peak Period – Plus 50%)		10	8	17	7	9	7	58
Average Movements per Day (Peak Period – Plus 50%)		20	16	34	14	18	14	116

Table 13.44-13: Forecast Construction Traffic - HGVs

Construction activity	Vehicle type	Green Hill A	Green Hill A.2	Green Hill B	Green Hill C BESS	Green Hill C Solar	Green Hill D	Green Hill E	Green Hill F	Green Hill G	Green Hill BESS
Construction Period (Working Days)	-	358	211	211	240	169	133	473	498	370	360
Modules and Batteries	16.5m Articulated	226	107	108	500	48	44	355	390	299	500
Mounting Structures	16.5m Articulated	178	84	85	40	38	34	279	307	235	40
Conversion units	16.5m Articulated	10	5	5	-	2	2	15	16	13	-
Access Track	10m Tipper/ 10m Rigid	182	86	87	0	39	35	287	315	241	39
General - fencing, landscaping	10m Rigid	400	189	190	0	85	77	628	690	528	85
<b>Total HGV deliveries during construction phase</b>	-	<b>995</b>	<b>471</b>	<b>475</b>	<b>540</b>	<b>212</b>	<b>191</b>	<b>1,564</b>	<b>1,719</b>	<b>1,315</b>	<b>664</b>
<b>Average daily HGV deliveries</b>	-	<b>3</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>4</b>	<b>2</b>
<b>Peak HGV daily deliveries</b>	-	<b>8</b>	<b>9</b>	<b>9</b>	<b>4</b>	<b>5</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>4</b>
<b>Peak HGV daily movements (two-way)</b>	-	<b>15</b>	<b>18</b>	<b>18</b>	<b>8</b>	<b>10</b>	<b>18</b>	<b>18</b>	<b>17</b>	<b>19</b>	<b>8</b>

### Calculations of aggregates

**10m tipper deliveries of access track aggregates:** Cottam 1,800, Green Hill Solar 1,311. Cottam’s deliveries of aggregates is significantly more than estimated for Green Hill Solar. Also by comparison, Heckington Fen solar estimates 2,100 10m tippers of aggregates for access tracks of 19km (10km of new tracks, 9km of new tracks).

It is not clear why Green Hill Solar's estimated HGV aggregate deliveries are estimated to be so much lower.

Even assuming that 'general landscaping and fencing' may include materials that could be termed 'aggregates', Green Hill Solar has estimated combined 10m tipper and 10m rigid vehicles delivering aggregate, general landscaping and fencing at a total 4,183 HGV deliveries, whereas Cottam is estimated at 5,600.

### **Internal haul routes/access tracks**

It is understood that the final layouts for schemes are not defined under the 'Rochdale envelope provision'. However, by its own definition Green Hill Solar requires three substantial construction compounds to be laid; internal haul routes between construction compounds and PV fields/substations etc; and access tracks. **Green Hill Solar should confirm the length/areas of internal haul routes, access tracks, construction compounds, BESS and substation groundworks, access splays, and their associated aggregate requirements, in order that accurate HGV forecasts may be made.**

For example: just 1km of internal track/haul route, at 5m wide, with 30 cm depth of crushed aggregate replacing topsoil, requires **100** average 10m tipper truck loads (holding around 15m<sup>3</sup>).

Green Hill BESS at Grendon substation and Green Hill C BESS, have no provision made for HGV deliveries of aggregate and concrete outside of the 39 aggregate tipper deliveries for Green Hill BESS access tracks. Zero aggregate deliveries for Site C BESS access tracks are projected, presumably because an access track already exists.

There are no forecasts for HGV movements relating to aggregates materials to the BESS sites beyond the access track aggregates. As a valid comparison, the transport plan for the construction of a 49.9 MW Statera BESS in Grendon starting in 2026 (the second BESS joining the 49.9MW already built by Statera in Grendon) includes 521 HGV movements, 280 of which are concrete and aggregate. See table below.

HGV Vehicles

Type of Vehicle	Number of Vehicles
Articulated Truck	Approximately 200 over a period of 16 weeks.  (Batteries, Inverters, MV blocks, GRP units, Welfare units, substation equipment, cable.
Waste Management	Collection of skip and container approximately 2perweek. Total 30.

250 Tonne Crane	1 per site. Use on site—does not affect traffic in and around site. Delivery included in Articulated low loader
Articulated Low Loader	Approximately 10 throughout construction period.  (For the delivery of construction machinery, invertersand 1each for the district network operator switch housing and the private switch housing.)
Concrete & Aggregate Lorries	Total 280 lorries. (Crushed aggregate, muck away and concrete for substation and foundations).
Total HGVs	521

### Construction compounds

There are no forecasts for HGV movements relating to aggregates required to create the very sizeable three construction compounds. If these will be surfaced using temporary construction matting (within 'landscape and fencing?'), these HGV deliveries should be estimated: both to deliver and presumably take away.

Will the construction compounds, or other surfaced areas at sites, provide for ALL of the necessary parking for workers 'vehicles? The applicant claims, based on other NSIP solar farm applications of similar size, an assumption on the number of workers to be brought in by shuttlebus each day. On the basis that even the applicant uses "assumed" percentage of workers, these figures are not validated. None of the other solar utilities have yet started construction apart from Cleve Hill Solar, which is now complete.

Cleve Hill Solar did NOT bring in 100% of its workers by shuttle bus: Cleve Hill Solar's CTMP states that up to 400 workers would be on site every day and they would ""encourage multi-occupancy vehicle sharing". A member of the Cleve Hill monthly Traffic Management Meeting confirms that "only a few workers were brought into site by minibus, but only those who were in lodgings 'down the road". This is a highly misleading and inaccurate claim by Green Hill Solar.

2.3.3 A summary of Solar Farm schemes that were reviewed and their assumed shuttle-bus mode share is presented in **Table 1**.

**Table 1: Example Solar Farm proposals using shuttle-bus services**

DCO Status	Scheme	Assumed percentage of workers travelling by shuttle-bus service
Post-decision stage	Gate Burton Energy Park	55%
Examination	Beacon Fen Energy Park	55%
Post-decision stage	Tillbridge Solar Project	47%
Post-decision stage	West Burton Solar Project	50%
Post-decision stage	Stonestreet Green Solar	75%
Post-decision stage	Longfield Solar Farm	55%
Post-decision stage	Cottam Solar Project	50%
Delivered	Cleve Hill Solar Farm	100%

If at its peak Green Hill Solar will have 1,099 workers on site, this means half, ‘around ’500 vehicles, will require parking, assuming that half arrive by a minimum 31 minibuses (holding 16 passengers). Parking for workers ‘vehicles can be estimated at a conservative 3 acres. Where will this worker parking be located to ensure no parking on the public roads?

**Cable corridor**

There are no calculations for HGV movements relating to delivery of specialised “thermally conductive backfill (often termed cable sand or thermal sand) to protect cables and facilitate heat dissipation”, required within the 31 km of cable route channels.

Green Hill Solar suggests 66 two-way HGV per day and 54 worker vehicle movements up to max 110 two-way HGVs per day and 90 two-way vehicle movements, relating to the Cable Corridor. Should all teams be working at once, these movements could peak at 110 two-way HGV movements and 90 two-way worker movements: these are significant figures. It is not clear whether these movements are included in the overall transport and traffic ‘estimations’, or are additional.

Is it confirmed that machinery and vehicles required to work within the cable route corridor, will entirely use internal haul routes? In which case can the applicant confirm the total length of the internal haul routes to ensure that aggregate quantities/HGV deliveries are accurately forecast.

Alternatively, if machinery and vehicles will move from compound to compound and to different parts of the cable corridor (and solar PV sites, substations), on the public road network, how does this affect and elevate vehicle movements, including HGVs, machinery, vans and workers on public roads during the working day?

Considering the crossing points across the highways, which must be used by HGVs and plant moving within the sites, can it be assumed that it would not be practical to wash wheels each time said vehicles and machinery crosses the public highway, also at the risk of creating additional mud/debris?

With regard to delivery of cable reels, it is understood that multiple deliveries will be offloaded on public roads at more than 20 site access points and then cable reels dragged in to site. What traffic delays/road closures/damage to roadsides are expected during such offloads?

**Misc other vehicles**

Green Hill Solar has not provided calculations for certain vehicles, including concrete mixer deliveries, waste away, water, welfare cabins/site offices, storage units, toilet facilities including provision for emptying.

There appears to be neither calculations of HGV vehicle movements relating to deliveries of water to site (potable, water used for vehicle wheel washing and general building work).

Green Hill Solar has not provided calculations for certain vehicles, including concrete mixer deliveries, waste away, water, welfare cabins/site offices, storage units, toilet facilities including provision for emptying. “ other than in APP/GH 6.2.40, 4.5.40 page 57. “An estimated 19 million litres of water will be required during construction to support welfare facilities and other uses?

If Greenhill know that they require 19 million litres of water, how come they don't know how many associated HGV's would be required?

There does not appear to be a table with the HGV movements for all this water?

Is this a deliberate attempt to keep the estimated HGV movements low?

As pointed out by National Highways, If the DCO should grant the applicant the right to use any watercourse: this risks significant flood, contamination of water courses, streams and particularly watercourses connected to the Nene and RAMSAR sites.

- (vi) **Article 17** this article allows the applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development. NH is concerned this provision potentially allows the applicant to make use of highway drainage infrastructure. This is not acceptable to NH, and the provisions of this article should exclude highway drainage.

There appears to be no calculations relating to concrete mixer HGV deliveries, unless all concrete is to be mixed on site, requiring significant water supplies?

There appear to be no specific forecasts of waste removal from sites. Even if 'muck way 'is removed by aggregate trucks departing empty, PV packaging and all other waste will require skip and/or removal from site.

As pointed out by National Highways, the DCO should grant the applicant the right to use any watercourse: this risks significant flood, contamination of water courses, streams and particularly watercourses connected to the Nene and RAMSAR sites.

- (vi) **Article 17** this article allows the applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development. NH is concerned this provision potentially allows the applicant to make use of highway drainage infrastructure. This is not acceptable to NH, and the provisions of this article should exclude highway drainage.

## Replacement phases

In the Environmental Statement EN010170-000210-GH6.2.13\_ES Chapter 13\_Transport and Access, the applicant has provided the table below as a calculation of traffic movements for replacing equipment. It has been clarified in the applicant's response EN010170-001190-GH8.1.14\_Applicant Responses that the BESS and inverters would need changing every ten years while PV arrays etc would be every 30 years. Can the applicant clarify that for the replacement of BESS equipment every decade, how long would the replacement construction phase take, and why would more HGV movements be required than at construction?

**Table 13.15: Comparison of forecast daily construction and replacement vehicle trips**

Construction activity	Green Hill A	Green Hill A.2	Green Hill B	Green Hill C BESS	Green Hill C Solar	Green Hill D	Green Hill E	Green Hill F	Green Hill G	Green Hill BESS
Construction peak daily HGV deliveries	8	9	9	4	5	9	9	9	9	4
Construction daily worker vehicles	68	27	27	33	10	8	75	76	62	36
Construction total daily vehicles	76	36	36	37	15	17	84	85	71	40
Replacement daily HGVs	4	3	3	5	2	2	3	3	3	5
Replacement daily worker vehicles	38	17	18	26	6	5	65	45	35	35
Replacement total daily vehicles	42	20	21	31	8	7	68	48	38	40
<b>Difference in HGVs between replacement and construction</b>	<b>-4</b>	<b>-6</b>	<b>-6</b>	<b>+1</b>	<b>-2</b>	<b>-7</b>	<b>-5</b>	<b>-5</b>	<b>-6</b>	<b>+1</b>
<b>Difference in worker vehicles between construction and replacement</b>	<b>-30</b>	<b>-10</b>	<b>-9</b>	<b>-7</b>	<b>-4</b>	<b>-3</b>	<b>-10</b>	<b>-31</b>	<b>-27</b>	<b>-1</b>

## Grendon Football club near Yardley compound

We are concerned specifically about safety of children and parents visiting Grendon Football club which is used particularly on Saturdays and weekday training. As you know there are no paths on these roads and multiple vehicles ( whatever type:- workers, LGVs of HGVs) close to this site will a serious cause for concern.

## Summary

In summary your range of reports are not clear. In your verbal response you quoted these figures were averages but the tables clearly say **Total HGVs** as well as daily averages. We need a full breakdown of each type of transportation by type and full totals (not just peak averages) please. There also needs to include a specific breakdown Saturdays and Sundays. If there is no Sunday work please can you confirm this in writing in your response? We are surprised and concerned the DCO does not require this in more detail as by this stage of the project as you you have this. At least in worst case scenarios (as you apply the Rochdale Envelope!) We need this to be clear and transparent so that the Examiners and relevant Councils can assess the detrimental impacts anticipated. Should the DCO be approved we then need a clear plan which is quantifiable, trackable and can be monitored by the Traffic Group and escalated where appropriate if not adhered to.

**Please can the applicant re-work its calculations to be clearer as we believe this is seriously underestimated?**

**Or**

**Is this a blatant attempt to mislead the examiners, councils and the general public?**