Additional submission by Linda Twohey following Issue Specific Hearing 5, section 3.2, comments on glint and glare effects on residential properties

1. I wish to expand further my comments made at ISH 5, on item 3.2, about the Applicant's assessment of glint and glare effects on residential properties, taking as an example, property R11 at New Lodge Barns, Walgrave. (See Fig 5.2, APP-155).
2. In APP-155, Table 4.2 shows the 'Dwellings Impact Significance Guidance'. Moderate impact is defined as: 'Predicted glare of any intensity which occurs for longer than 60 minutes or for more than 3 months per year. Application of professional judgement does not significantly decrease the significance of the potential glare. Mitigation may be required at the planner's discretion'.
3. According to my calculations, using the Applicant's modelled data, if fixed panels are deployed, R11 will experience:
   Glare for >6 months per year, from both Sites A and A2, with 50 – 55 minutes of glare for at least 5 months, occurring both morning and early evening.
4. If tracking panels are used:
   Glare for >6 months per year, minimum 30 minutes per day, from Site A and/or A2, 50 – 55 minutes glare for at least 5 months, occurring both morning and early evening.
5. With both types of panels, this clearly falls into the Moderate impact category.
6. Additionally, the Applicant has modelled all the residential glare results as at 1.8m above ground level, i.e. on ground floor only. This is stated to be 'Industry Guidance' but is

evidently inappropriate for residential properties where it cannot be assumed that receptors in upper level rooms are not subject to any adverse effects, particularly as the timing of glare with both types of panel will tend to be early morning and early evening. Also, many residential properties are now used as offices for working from home.

7. In Results discussion, 6.1.3, (APP-155) a photograph has been taken from the Kettering Road opposite R11, Figure 6.4, directly into the existing hedgerow, which appears to have been chosen for it's particularly high vegetation, not representative along this stretch of road.
8. It states 'Line of sight from PV3 Green Hill A towards R11 is expected to be obstructed by PV2 Green Hill A. Furthermore, line of sight between R10 and PV2 Green Hill A is obstructed by intervening topography'. I cannot find any diagram which explains which fields of Site A are in each of PV1, PV2 and PV3, so are unable to assess this myself. But surely the modelling has already taken topography into account in it's calculations of angles of glare? If not, how much confidence can be placed in these results, across all of the Glint and Glare assessments, on residential, road users and aviation?
9. The Applicant then concludes that the line of sight from R11 towards the remaining panels of Site A and all of Site A2 will be obstructed 'by vegetation that is to form instant screening as part of embedded mitigation for the Landscape and Visual Impact Assessment'. Reference to APP-208 shows that native tree and scrub planting, instant screening, is planned for the side of A2 opposite R11. However, the land is rising, so any effects are likely to be limited. Reference to APP-207, shows that no instant screening is planned at all for the east side of Site A which faces towards the properties including R11 at New Lodge Barns.

10. In 6.1.3.2, Cloud Cover, the Applicant uses the fact that there is likely to be between 43% and 65% cloud cover during the months March -September in this area, as further reason to downgrade the predicted effects on residential receptors. They state 'the modelled glare from the Scheme is likely to occur 43% less often than predicted as a minimum.' But this is not correct, as any experience of seeing ground-mounted solar PV panels shows that glare occurs in overcast as well as clear skies.

11. Section 6.1.4 then shows that glint and glare effect on R11 is considered to have been assessed as 'low impact (upon applying professional judgment)'**.** This 'professional judgment' is not qualified, we are not provided with any basis to assess this, and should be disregarded as it is clearly open to bias from the developer's viewpoint.

12. In total, 19 residential properties in Walgrave have had the impact rating of the effect of glint and glare from panels classified as 'low, by applying professional judgment'. This appears to have been reached by limiting assessment of effects to the ground floor, overstating the existence of vegetation intervening in sight lines, and using cloud cover spuriously to downgrade impacts to low.

13. This approach to assessments has been replicated for hundreds of residential properties across all the other areas affected by the other Sites planned for solar PV development. This turns what should be objective calculations into subjective 'guestimates' whose validity is therefore unreliable. I believe that this allowed a serious underestimate of the effects of glint and glare on residential receptors by the Applicant.

14. The potentially affected residents have not been informed directly by the Applicant of these effects, and are likely to be unaware of this. As I have observed elsewhere,

with the volume of DCO documentation, it is difficult for a lay person to navigate and find the finer detail, even with considerable perseverance. Therefore I contend that they have not been given the opportunity to present their views, with personal circumstances, on the range of adverse impacts of glare they would anticipate experiencing in the event of this development proceeding. I believe that these views are essential to guide decision-making surrounding this aspect of the proposed Green Hill Solar industrial complex.

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