GREEN HILL
SOLAR FARM

Green Hill Solar Farm
EN010170

Planning Statement
Revision C

Prepared by: Lanpro

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Schedule of Changes

Revision	Section Reference	Description of Changes	Reason for Revision
A	[cover]	Updated to Revision A	As required for submission at Deadline 1.
	[throughout]	Updates to document references	As required for submission at Deadline 1.
	Pgs. 22, 33, 38 and 105	Updates to policies relating to the emerging Milton Keynes City Council Local Plan	Emerging Milton Keynes City Council Local Plan moving to Regulation 19 consultation stage
B	[cover]	Updated to Revision B	As required for submission at Deadline 4.
	[throughout]	Updates to document references	As required for submission at Deadline 4.
	[throughout]	Updates to reflect the updated NPS's and Mears Ashby Village Hall Design Statement	Update NPSs issued in December 2025. North Northamptonshire Council Local Impact Report noted the Mears Ashby Village Hall Design Statement should be included.
C	[cover]	Updated to Revision C	As required for submission at Deadline 6.
	[throughout]	Updates to document references	As required for submission at Deadline 6.
	Pg.8	Change to 100MW	To reflect the change in threshold introduced via The Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 which came into force on the 31 December 2025
	Pg. 55	Update to reference to Emerging West Northamptonshire Local Plan (Regulation 18) as an updated version was published for consultation	As requested by West Northamptonshire Council through Statement of Common Ground discussions
	Pg.56	Added reference to Emerging West Northamptonshire Local Plan (Regulation 18)	As requested by West Northamptonshire Council through Statement of Common Ground discussions

	Pg. 61	Added reference to the DEFRA Land Use Framework for England (March 2026)	Ongoing due diligence

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 6

Planning Statement
Revision C

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1 Introduction

1.1 Introduction

1.1.1 Green Hill Solar Farm Limited (the Applicant) has prepared this Planning Statement (the Statement) as part of an application for a Development Consent Order (DCO) to construct, operate, maintain and decommission the Green Hill Solar Farm (the Scheme).

1.1.2 The Scheme comprises a number of fields (the 'Site' or 'Sites') described as Green Hill A, Green Hill A.2, Green Hill B, Green Hill C, Green Hill D, Green Hill E, Green Hill F, Green Hill G, and Green Hill BESS for the solar arrays, grid connection infrastructure and energy storage; and the Cable Route Corridors. The Sites are located to the northeast and southeast of Northampton, and the west and south of Wellingborough. See the Site Location Plan **[REP3-004]** for the site locations.

1.1.3 The Scheme is described in full in ES Chapter 4: Scheme Description **[EX6/GH6.2.4_B]** supporting the application.

1.1.4 The DCO application is for the construction, operation (including maintenance) and decommissioning of the Scheme. The Scheme consists of a solar photovoltaic (PV) array electricity generating station, energy storage facility and grid connection to the national electricity transmission network (NETS). The Scheme is located within the administrative boundaries of North Northamptonshire and West Northamptonshire; with Green Hill G and part of the Cable Route Corridor located within the administrative boundary of Milton Keynes City.

1.1.5 The Scheme would generate large amounts of electricity from a renewable source and so it would assist the Government in meeting its targets to decarbonise our electricity supply and reduce overall carbon emissions.

1.1.6 The Government expects large scale solar generation to make an important contribution to achieving its objectives for the UK's power system which are to ensure the supply of energy always remains secure, reliable, affordable, and enables the UK to meet its carbon emission reduction commitments. These include the achievement of net zero carbon emissions by 2050 and delivery of carbon budgets in the intervening years. Further details are set out in the Statement of Need **[APP-556].**

1.1.7 National Policy Statements for Energy (NPSs) (published in November 2023 and designated in 2024) provide the policy framework for determining this DCO application. The updated NPSs for Energy were published in December 2025 and designated on 7 January 2026.

1.1.8 Overarching National Policy Statement for Energy (2023) (EN-1) (Ref.1) states at paragraph 3.3.58 that new low carbon energy NSIPs are required urgently in the next 10 years:

"*Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward*

as soon as possible, given the crucial role of electricity as the UK decarbonises its economy."

1.1.9 It also sets out at paragraph 3.3.20 that solar, along with wind, is expected to be the main form of electricity generation in an energy system that meets the Government's objectives for delivering secure, affordable energy and meets its climate change commitments:

"Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar."

1.1.10 Paragraph 3.3.21 goes on to state that there is a requirement for sustained growth in capacity in onshore solar in the next decade.

"As part of delivering this, UK government announced in the British Energy Security Strategy and ambition to deliver up to 50 gigawatts (GW) of offshore wind by 2030, including up to 5GW of floating wind, and the requirement in the Energy White Paper for sustained growth in the capacity of onshore wind and solar in the next decade."

1.1.11 EN-1 (2023) recognises the urgent strategic role of 'nationally significant low carbon infrastructure' by designating its provision as a critical national priority (CNP) at Paragraph 4.2.4.The updated EN-1 (December 2025) (Ref.13) further reinforces the need and support for increasing the supply of low carbon energy to meet the government's commitment to the Clean Power 2030 Mission. The commitment to the Clean Power 2030 Action Plan is subject to securing supply which means providing half of the energy demand in 2050 by electricity to shift away from fossil fuels. Paragraph 4.2.4 of the updated EN-1 (December 2025) (Ref.13) acknowledges that the pace of planning delivery will need to significantly increase to allow the government to meet its Clean Energy targets which will require more development consent applications to enter the system, be examined and decided within the statutory timescales.

1.1.12 The Clean Power 2030 Action Plan (December 2024) (Ref.4) states in page 11 that successful delivery will require rapid deployment of new clean energy capacity across the whole of the UK. There is an acknowledgement that there needs to be reform to the grid connection process to reduce the queue to connect by working with NESO and Ofgem to provide a framework through which NESO can work with Transmission Owners (TOs) and Distribution Network Operators (DNOs) to prioritise projects needed for 2030, while maintain a robust pipeline beyond 2030.

1.1.13 The Scheme represents an excellent opportunity to deliver a critical part of the portfolio of renewable energy generation that is urgently required by 2030.

1.1.14 The Scheme would also deliver biodiversity net gain (BNG) through the commitments set out in the Outline Landscape and Ecological Management Plan (OLEMP) **[EX6/GH7.4_E].** These include habitat management areas for

biodiversity mitigation and enhancements, and will deliver the following from a BNG perspective:

- Habitat Units 57.01%;
- Hedgerow Units 13.86%; and
- River Units 12.86%.

1.1.15 Further detail on this can be found within ES Appendix 9.13 Biodiversity Net Gain Assessment **[REP1-043].**

1.1.16 The site selection and Scheme design has been developed at every stage to minimise the impact on the local area. Areas of the Scheme that were included at the non-statutory and statutory consultation stages have since been removed to reduce or remove impacts on the nearest residents, designated heritage assets, landscape character, flood risk, airstrip operations, and for ecological reasons. The Sites' layouts have also been designed so that larger structures such as substations and the energy storage facility are located based upon landscape assessment and archaeological investigation works so that their impacts are minimised. ES Chapter 5: Alternatives and Design Evolution **[APP-042]** and the Design Approach Document **[APP-560]** explain the design evolution of the Scheme in detail.

1.1.17 Overall, the proposals are considered to comply with planning policies and deliver much needed large-scale energy-generating infrastructure in a way that is sensitive to its surrounding area and delivers additional benefits. Compliance with relevant National and Local Planning Policies is set out in the Policy Compliance Document **[REP4-014]**.

1.2 The Applicant

1.2.1 The Scheme is being developed by the Applicant. The Applicant is part of Island Green Power Limited (IGP) which was established in 2013.

1.2.2 IGP has more than 11 years' worth of experience in delivering renewable energy projects in 8 countries including, England, Scotland, Northern Ireland, Wales, Republic of Ireland, Spain, Australia and New Zealand. IGP has successfully delivered 36 projects worldwide with a total of more than 2.5GW of energy capacity. This includes 20 projects in the UK. These range in size from below 5MW to Nationally Significant Infrastructure Projects (NSIPs) such as Cottam Solar Project, currently the UK's largest consented solar farm, which will generate 600MW of clean, renewable and secure electricity including 600MW of Battery Storage. Further information on the Applicant can be found in the Funding Statement **[REP3-030]** that has been submitted as part of the Application.

1.2.3 IGP has a proven track record with the DCO application process. IGP is the recipient of a granted DCO for the Cottam Solar Project in Lincolnshire and Nottinghamshire, which was consented on 5 September 2024 (PINS Reference: EN010133) and of a granted Development Consent Order for the West Burton Solar Project in Lincolnshire and Nottinghamshire, which was consented on 24 January 2025 (PINS Reference: EN010132).

1.3 Legislative Context Review

1.3.1 The Scheme is defined as a Nationally Significant Infrastructure Project (NSIP) under Sections 14(1)(a), 15(1) and 15(2) of the Planning Act 2008 (PA 2008) (Ref.5) as it is for the construction of an onshore generating station in England with a capacity exceeding 100 megawatts (MW). The PA 2008 requires a DCO to be obtained for the development of NSIPs.

1.3.2 The PA 2008 prescribes that the Secretary of State (SoS) is responsible for determining an application for development consent, with the power to appoint an Examining Authority (ExA) of appointed person(s) to manage and examine the application. The ExA, appointed through the Planning Inspectorate, will make procedural decisions and examine the application. Following their examination of the application, the ExA will make a recommendation to the SoS who will then decide whether to grant a DCO.

1.3.3 DCO applications are determined in line with Section 104 of the PA 2008 where a relevant National Policy Statement (NPS) is in place, or Section 105 where one is not. NPSs set out the policy basis upon which NSIPs are determined.

1.3.4 NPSs for Energy were published in November 2023 and were designated on 17 January 2024 in accordance with the PA 2008. They are applicable to all new DCO applications for energy NSIPs under S104 of the PA 2008 from early 2024.

1.3.5 Three of the NPSs are relevant to this DCO application:

- Overarching National Policy Statement for energy (EN-1) 2023 (Ref.1);
- National Policy Statement for renewable energy infrastructure (EN-3) 2023 (Ref.2), which includes specific policies for solar photovoltaic generation NSIPs; and
- National Policy Statement for electricity networks infrastructure (EN-5) 2023 (Ref.3).

1.3.6 The updated NPSs for Energy (December 2025) were published on the 13 November 2025 and were laid before Parliament under section 9(8) of the Planning Act 2008. In accordance with section 5(4) and (4A), and were designated on 7 January 2026, after a period of 21 ‘sitting days’ in the House of Commons.

1.3.7 Section 1.6 of NPS EN-1 (December 2025) (Ref.13) sets out the transitional provisions and states that for DCO applications accepted for examination before the final publication of the approved 2025 amendment, the 2023, designated in 2024 suite of NPSs should have effect in accordance with the terms of those NPSs. Consequently, the DCO application for the Scheme will be determined in accordance with Section 104 of the PA 2008 (Ref.5).

1.3.8 However, paragraph 1.6.3 of NPS EN-1 (December 2025) states that “*However, any emerging draft NPSs (or those designated but not yet having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and*

with regard to the specific circumstances of each Development Consent Order application."

1.3.9 A more detailed explanation of the legislative and policy context of the Scheme is set out in Section 5 of this Planning Statement.

1.3.10 The Scheme is 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref.6) (the EIA Regulations) which means that an Environmental Impact Assessment (EIA) is required. An Environmental Statement (ES) has been prepared and has been submitted with the DCO application **[APP-037** to **APP-544]**.

1.3.11 A DCO may include provisions which removes the requirement to obtain other consents. Details of the consents and authorisations included in the DCO are explained in the Explanatory Memorandum to the draft DCO **[EX6/GH3.1_E]**. A Consents and Agreements Position Statement **[REP5-077]** explains those other consents and licenses that are, or may be required under other legislation, that will be sought separately from the DCO for the construction and operation of the Scheme.

1.3.12 Section 115 of the PA 2008 also states that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right but is associated with the NSIP. The NSIP and associated development works are defined in Schedule 1 of the draft DCO **[EX6/GH3.1_E]** and explained in the Explanatory Memorandum referred to above.

1.3.13 The elements of the Scheme that constitute the NSIP and the elements that constitute associated development are summarised in Section 3 of this Planning Statement.

1.4 Pre-Application Consultation

1.4.1 The Applicant has undertaken extensive consultation throughout the development of the Scheme. This is described in the Consultation Report **[REP1-017]**, and includes the stages listed below.

- Soft launch with briefings to stakeholders including MP's, Host Authorities, residential and commercial properties within 50m of the site boundary and joint briefings with over 20 Parish Council members and meetings in January 2024.
- Early engagement workshops with 50 members of the local community on early designs of the Scheme in March 2024.
- Launch of Green Hill G and introductory newsletter about the Scheme to over 7000 households within 1km of the Scheme in April 2024.
- Environmental Impact Assessment Scoping Opinion Report in May 2024
- Discussion and consultation with the three Host Authorities of the content of the Statement of Community Consultation (SoCC) in September 2024.
- Statutory consultation with the public and statutory consultees during November to December 2024.

- Continued consultation to inform the Scheme design and targeted consultation on Order Limits during January to May 2025.

1.4.2 The Applicant has had regard to all feedback it has received in response to its consultations when developing the Scheme. This is described in the Consultation Report referred to above.

1.4.3 The ongoing consultation with the North Northamptonshire Council, West Northamptonshire Council and Milton Keynes City Council (the Host Authorities) has comprised regular meetings where updates have been provided on the Scheme, including the development of the design, and technical meetings with the Host Authorities' relevant technical specialists, including on the topics of noise, heritage, landscape and visual impact, water and drainage, transport, ecology, climate change and public rights of way. The discussions with the Host Authorities have played a major role in informing the development of the Scheme design and the content of the application, including the ES as shown within Sections 4 to 11 of the Consultation Report **[REP1-017]**. These detail how the engagement with Local Authorities and others has been undertaken from the early consultation stage in January 2024 through to submission of the application. Table 1.1 of the Consultation Report **[REP1-017]** presents a summary of the changes made to the scheme in response to consultation feedback.

1.5 Purpose and Structure of this Planning Statement

1.5.1 The purpose of the Planning Statement is to provide an overview of the Scheme, its impacts, and the DCO application as a whole, in a way that is easy to understand. It considers and assesses the Scheme against relevant planning policy and other matters the Applicant considers are likely to be important and relevant to the SoS's decision.

1.5.2 The remainder of the Planning Statement is structured as follows:

- Section 2 describes the existing land uses and characteristics of the Sites and their surroundings and the Cable Route Corridor, including planning history and local plan designations. The reasons for selecting the Sites and the extent to which alternatives may be considered important and relevant to the decision is set out within ES Chapter 5: Alternatives and Design Evolution **[APP-042]** and ES Appendix 5.1 Site Selection Assessment **[REP1-037];**
- Section 3 provides a summary of the Scheme;
- Section 4 summarises the need and benefits of the Scheme;
- Section 5 outlines the decision-making framework; the planning policy context for the Scheme; and other legislation and policy considered by the Applicant to be important and relevant;
- Section 6 explains the Scheme's compliance with planning policy that the Applicant expects to be important and relevant to the decision. This should be read in conjunction with the Policy Compliance Document **[REP4-014]**; and

- Section 7 presents the overall planning balance and conclusions of this Planning Statement.

1.5.3 There are two appendices appended to this Planning Statement. These appendices are to be read in conjunction with the Planning Statement and are as follows:

- **Appendix A**: Planning Application History Search – Sites including Cable Route Corridor; and
- **Appendix B**: Flood Risk Assessment – Sequential Test and Exception Test.

2 The Order Limits

2.1 Introduction

2.1.1 The Order Limits, which include all land falling within the DCO application and cover an area of 1,441.4 hectares (ha), are located within the administrative areas of North Northamptonshire Council, West Northamptonshire Council, and Milton Keynes City Council (see Location Plan **[REP3-004]**).

2.1.2 The land within the Order Limits comprises nine sites referred to as Green Hill A, A.2, B, C, D, E, F, G, and BESS (together known as the Sites) and the land required for the grid connection is referred to as the Cable Route Corridor. These are described below. The works forming part of the Scheme that are to be located in each Site are described in Section 3 of this Planning Statement.

2.2 Site Description

2.2.1 A full description of the Sites is set out at ES Chapter 3: The Development Site **[REP1-029]**. The nine Sites identified for built development, namely, solar panels, substations and energy storage for the Scheme are located within a 15km radius of the grid connection at Grendon 400 kV National Grid Substation.

Green Hill A

2.2.2 Green Hill A covers approximately 173.7 hectares. The village of Walgrave is 600m south, and the village of Old is 300 m west of Green Hill A. Cherry Hill, a small hamlet developed in the early 2000s, is south west of Green Hill A. The nearest properties in Old are approximately 80 m west of Green Hill A. Some isolated properties are near the boundaries of Green Hill A, outside Old and Walgrave.

2.2.3 Green Hill A consists of two groups of agricultural fields in the parishes of Old and Walgrave, within the West Northamptonshire Council area. The land is characterised by fields separated by hedgerows and scattered trees. Green Hill A slopes gently from north to south, ranging from approximately 105m to 135m Above Ordnance Datum (AOD), with a shallow valley and a small tree-lined stream in the center-west. An 11kV overhead power line also runs north-south through the center of Green Hill A, parallel to Newland Road, and there is a small, derelict agricultural building in the north.

2.2.4 Scaldwell Conservation Area is located approximately 2km to the west of Green Hill A. There is a cluster of 17 listed buildings at Old village to the west of Green Hill A, the nearest being the Grade II listed Jasmine Cottage (NHLE 1376865), approximately 130m from Green Hill A's western extent. These are all Grade II listed buildings apart from the Church of St Andrew (NHLE 1376651) which is Grade I.

2.2.5 There is a cluster of 10 listed buildings at Walgrave to the south of Green Hill A, the nearest being the Grade II listed North Hall (NHLE 1203361), approximately 615m from Green Hill A's southern boundary. These are all Grade II listed buildings apart from the Church of St Peter (NHLE 1281745) which is Grade I. White Lodge Farmhouse, approximately 320m to the east of Green Hill A is a Grade II listed building (NHLE 1203302).

2.2.6 Walgrave East Meadow Local Wildlife Site (LWS) is located 600m south-east of Green Hill A. The neutral grassland meadow, which also contains two streams fringed with rush pasture, supports a diverse range of meadow plants and indicator species.

2.2.7 Broughton Green Lane LWS is located 700m east of Green Hill A. This site comprises a green lane, which forms a wildlife corridor, with ancient woodland indicators and a diverse range of invertebrates recorded.

2.2.8 Old Poors Gorse LWS is located 900m north of Green Hill A and comprises a woodland approximately 9.5 hectares in size.

2.2.9 A network of land drainage ditches is located within Green Hill A and A.2. Flows within the ditches are expected to flow generally in a south-westerly (Green Hill A) and westerly (Green Hill A.2) direction based on local topography.

2.2.10 The entirety of Green Hill A is situated in Flood Zone 1 and therefore has less than a 1 in 1,000 annual probability of river or sea flooding.

2.2.11 Green Hill A is located within two of the National Character Areas (NCAs) as defined by Natural England as:

- NCA Profile: 89 Northamptonshire Vales (NE527); and
- NCA Profile: 95 Northamptonshire Uplands (NE565).

2.2.12 Green Hill A is located within one Regional Landscape Character Type (LCT), LCT 5 Clay Plateau which contains one Landscape Character Area (LCA), LCA 5b Sywell Plateau, as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7).

Green Hill A.2

2.2.13 Green Hill A.2, located 800m south east of Green Hill A, covers approximately 65.3 hectares.

2.2.14 Green Hill A.2 is approximately 900m east of Walgrave and 900m north east of Hannington. Rectory Farm and New Lodge Farm border the site.

2.2.15 Green Hill A.2 consists of two groups of agricultural fields in the parishes of Old and Walgrave, within the West Northamptonshire Council area. The eastern boundary of Green Hill A.2 is adjacent to North Northamptonshire Council boundary.

2.2.16 Green Hill A.2 slopes gently from east to west, ranging from approximately 110m to 135m AOD. Both areas have agricultural access from nearby roads.

2.2.17 An 11kV overhead line crosses the easternmost field of Green Hill A.2, which also has a small telecoms tower north of Rectory Farm.

2.2.18 The nearest bridleway NN|CT|3 runs east to west just south of Green Hill A.2. After crossing the A43 (Kettering Road), there are other bridleways leading to Broughton and Pytchley. A network of land drainage ditches is located within Green Hill A.2. Flows within the ditches are expected to flow generally in a westerly (Green Hill A.2) direction based on local topography.

2.2.19 The entirety of Green Hill A.2 is situated in Flood Zone 1 and therefore has less than a 1 in 1,000 annual probability of river or sea flooding. The Environment Agency's (EA) Historical Flood Map indicates that Green Hill A.2 have historically flooded and neither has the area immediately surrounding either site.

2.2.20 Broughton Conservation Area is located approximately 2.3km to the northeast of Green Hill A and Green Hill A.2. The Grade II listed Pytchley Lodge (NHLE 1213833) is located 1km northeast of Green Hill A.2. Walgrave East Meadow Local Wildlife Site (LWS) is located 150m west of Green Hill A.2. The neutral grassland meadow, which also contains two streams fringed with rush pasture, supports a diverse range of meadow plants and indicator species. Highcroft Farm Meadow LWS is located 500m north of Green Hill A.2. The meadow, although predominately species poor having declined due to lacking appropriate management, hosts an invertebrate assemblage with supporting habitats.

2.2.21 Green Hill A.2 is located entirely within NCA Profile: 89 Northamptonshire Vales (NE527). Green Hill A.2 is located within one Regional Landscape Character Type (LCT), LCT 5 Clay Plateau which contains one Landscape Character Area (LCA), LCA 5b Sywell Plateau, as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7).

Green Hill B

2.2.22 Green Hill B is approximately 64.7 ha in area. Green Hill B is the westernmost site, located south-southwest of Green Hill A, within West Northamptonshire, in the civil parish of Holcot and near the boundary with Overstone. It is situated 850m south of Holcot village and 1.2km northeast of Moulton village. Green Hill B surrounds Tithe Farm Barns, which have been converted into commercial units, and there are individual residential properties nearby to the north and south.

2.2.23 The area consists of agricultural fields separated by hedgerows, with some woodland in the western part. The eastern part is relatively flat, while the western part slopes gently to the southwest. The elevation ranges from approximately 120m to 130m AOD.

2.2.24 Footpath NN|CW|1 passes through the easternmost part of Green Hill B heading north to the village of Holcot, and south where it is redesignated NN|DG|2 (where it crosses into Overstone parish) before it joins footpath NN|DG|3 from Moulton. The are two nearby land drains, one located to the south and one to the east of the site boundaries.

2.2.25 There are two land drainage ditches located immediately to the south and southeast Green Hill B. Flows within the ditches flow in a south-westerly direction based on local topography. All the land drains are ordinary watercourses.

2.2.26 Fluvial flooding could occur if the land drains overtopped their banks during or following an extreme rainfall event. The entirety of Green Hill B is situated in Flood Zone 1 and therefore has less than a 1 in 1,000 annual probability of river or sea flooding. The EA Historical Flood Map indicates that Green Hill B has not historically flooded and neither has the area immediately surrounding Green Hill B.

2.2.27 The nearest Conservation Area is Moulton Conservation Area, approximately 1.5km to the south west of Green Hill B. There is a cluster of eight listed buildings at the village of Holcot, the nearest being Pollys Cottage (NHLE 1067007) which is Grade II listed and is approximately 725m to the north-east of Green Hill B. All of the listed buildings in the village are Grade II apart from the Church of St Mary and All Saints (NHLE 1045863) which is Grade I listed and is approximately 750m to the north-east of Green Hill B.

2.2.28 The Old Farmhouse and Attached Stables approximately 500m to the south east of Green Hill B is a Grade II listed building (NHLE 1354758). Overstone Old Rectory, approximately 275m to the southeast of Green Hill B, is a Grade II listed building (NHLE 1075355). Rectory Farmhouse, approximately 70m to the southeast of Green Hill B, is a Grade II listed building (NHLE 1025896).

2.2.29 Green Hill B is located within two of the NCAs as defined by Natural England as NCA Profile: 89 Northamptonshire Vales (NE527), and NCA Profile: 95 Northamptonshire Uplands (NE565). Green Hill B is located within Regional LCT: 5 Clay Plateau and one LCA, LCA Profile: 5b Sywell Plateau, as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7).

2.2.30 The Upper Nene Valley Gravel Pits SPA and Ramsar site is located approximately 10km southeast of Green Hill B. The site comprises a chain of exhausted sand and gravel pits, extending for approximately 35km along the alluvial deposits of the River Nene floodplain running from Clifford Hill on the southern outskirts of Northampton, downstream to Thorpe Waterville north of Thrapston. There are a further two LCT's located within 2km and 5km south of Green Hill B including; Regional LCT: 4 Rolling Ironstone Valley Slopes and LCT Profile: 17 River Valley Floodplain.

2.2.31 Pitsford Reservoir SSSI is located 800m northwest (at the closest point) of Green Hill B. The reservoir and surrounding habitats host large numbers of birds associated with open water, both throughout winter and breeding seasons. Botanical habitats are also very diverse, with many county rarities recorded.

Green Hill C

2.2.32 Green Hill C covers approximately 56.3 ha and mainly consists of agricultural fields, with a cleared area and access road for the neighboring Sywell Solar Farm. It spans Sywell and Mears Ashby parishes in North Northamptonshire. The land features medium-sized fields separated by hedgerows and substantial tree belts, and it is adjacent to Sywell Wood. A shallow valley with a small stream runs north-south through the center, with elevations ranging from approximately 110m to 120m AOD.

2.2.33 Green Hill C is approximately 1.5km northeast of Sywell village and 1.3km north of Mears Ashby. There are no defined settlements nearby, but Beckworth Emporium Garden Centre is opposite the southern part of Green Hill C. Wood Lodge Farm is on the western boundary and accessible via Sywell Road. Green Hill C is also adjacent to Sywell Aerodrome, which includes an employment area, museum, aerodrome facilities, and a hotel.

2.2.34 Bridleway NN|TN|7 runs along a tree belt through the centre-west of Green Hill C whereafter it turns north and follows the perimeter of Sywell Wood. This route also forms part of the Northamptonshire Round long-distance walking route.

2.2.35 There is one land drainage ditch which runs through the centre of Green Hill C. Flows within the ditches are assumed to flow in a south-westerly direction based on local topography. All the land drains are ordinary watercourses. The entirety of Green Hill C is situated in Flood Zone 1 and therefore has less than a 1 in 1,000 annual probability of river or sea flooding.

2.2.36 The EA Historical Flood Map indicates that Green Hill C has not historically flooded and neither has the area immediately surrounding it.

2.2.37 Sywell Conservation Area is located approximately 1km to the south-west of Green Hill C. Green Hill C is located within one NCA as defined by Natural England as NCA Profile: 89 Northamptonshire Vales (NE527).

2.2.38 Green Hill C is located at the southeastern edge of the NCA Profile: 89 Northamptonshire Vales and borders NCA Profile: 91 Yardley Whittlewood Ridge.

2.2.39 Green Hill C is located within LCT: 5 Clay Plateau and one LCA, LCA 5b: Sywell Plateau, as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7). Hardwick Lodge Meadow SSSI is located 1.5km north of Green Hill C. Hardwick Wood LWS is approximately. 1.6km north of Green Hill C and comprises an ancient woodland replanted with oak and spruce. At least 20 ancient woodland indicators and neutral grassland indicators were recorded on site.

2.2.40 Sywell Reservoir and Country Park LWS is located 1.8km south of Green Hill C. In addition to SSSI status, the Country Park consists of a reservoir and a mosaic of other habitats, including neutral grassland, scrub woodland and swamp edge habitat.

2.2.41 Vivians Covert LWS is located 1.8km east of Green Hill C, a small woodland in which at least seven ancient woodland indicators are present.

Green Hill D

2.2.42 Green Hill D is approximately 42 ha in area. Green Hill D is located 240m east of Green Hill C. It is a narrow strip of fields stretching 1.6km north to south and is approximately 300 to 400m wide. Green Hill D is entirely within Mears Ashby parish in North Northamptonshire, with its northeastern boundary adjacent to Wilby and Wellingborough parishes.

2.2.43 The site consists of agricultural fields separated by hedgerows and scattered trees, with a more established tree belt along the western boundary. The land slopes gently from east to west, where a stream (a tributary of Swanspool Brook) marks the boundary. Elevations of the land topography range from approximately 100m to 120m above ordnance datum (AOD). Footpath NN|TN|3# runs north to south from the southernmost point of Green Hill D, running directly through the centre of Green Hill D to its meeting point with Wellingborough Road. Herein on

NN|TN|3 continues north to Hardwick, where it is redesignated at Footpath NN|TG|4.

2.2.44 There is an unnamed ordinary watercourse which is located along the western boundary of Green Hill D, flowing in a southernly direction, where it later becomes the main river Swanspool Brook approximately 2.6km south east of Green Hill D.

2.2.45 There is an unnamed ordinary watercourse located along the western boundary of Green Hill D, flowing in a south-westerly direction. Fluvial flooding could occur if the ordinary watercourse overtopped its banks during or following an extreme rainfall event.

2.2.46 The majority of Green Hill D is situated in Flood Zone 1 and therefore has less than a 1 in 1,000 annual probability of river or sea flooding. However, a limited area to the south-western boundary is identified as being in Flood Zone 3, associated with the unnamed ordinary watercourse.

2.2.47 The EA Historical Flood Map indicates that Green Hill D has not historically flooded and neither has the area immediately surrounding it.

2.2.48 Mears Ashby Conservation Area is located approximately 115m to the south west of Green Hill D at its nearest point. There is a cluster of 29 listed buildings at Mears Ashby, the nearest being the Grade II listed Manor Farmhouse (NHLE 1040695), approximately 175m south west of Green Hill D. These are all Grade II listed buildings apart from the Church of All Saints (NHLE 1040692) and Mears Ashby Hall (NHLE 1040699) which are both Grade II* listed.

2.2.49 Green Hill D is located within one NCA as defined by Natural England as NCA Profile: 89 Northamptonshire Vales (NE527). Green Hill D is located at the southeastern edge of the NCA Profile: 89 Northamptonshire Vales and borders NCA Profile: 91 Yardley Whittlewood Ridge. Green Hill D is located within LCT: 5 Clay Plateau and LCA 5b: Sywell Plateau, as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7).

2.2.50 There are a further two LCTs located between 2km and 5km south of Green Hill D; LCT Profile: 18 Broad River Valley Floodplain; and LCT Profile: 4 Rolling Ironstone Valley Slopes.

2.2.51 The Upper Nene Valley Gravel Pits SPA and Ramsar site is approximately 6km east and south east of Green Hill D. The globally internationally important site comprises a chain of exhausted sand and gravel pits, extending for approximately. 35km along the alluvial deposits of the River Nene floodplain running from Clifford Hill on the southern outskirts of Northampton, downstream to Thorpe Waterville north of the village of Thrapston.

2.2.52 Hardwick Lodge Meadow SSSI is located 1.7km north west of Green Hill D. This is a large area of diverse permanent pasture with an exceptionally rich and varied grassland flora that, in turn, supports uncommon invertebrates.

2.2.53 Sywell Reservoir and Country Park LWS is located 1.2km south of Green Hill D. The Country Park comprises reservoir and a mosaic of other habitats, including neutral grassland, scrub woodland and swamp edge habitat.

2.2.54 Vivians Covert LWS is located 1.4km north east of Green Hill D, a small woodland in which at least seven ancient woodland indicators are present with the site considered a good candidate for improvements.

2.2.55 Park Farm Industrial Estate LWS is located 1.7km east of Green Hill D. Green Hill D contains a mosaic of grassland, scrub and woodland habitats.

2.2.56 Hardwick Wood LWS is approximately 2km northwest of Green Hill D and comprises an ancient woodland replanted with oak and spruce. At least 20 ancient woodland indicators and neutral grassland indicators were recorded on site.

2.2.57 Hardwick Road Verge LWS is located 2km northeast of Green Hill D. Bounding the north and south of Hardwick Road, the grassland communities on the road verges are indicative of neutral grassland habitats.

Green Hill E

2.2.58 The Green Hill E is approximately 308.6 ha in area. Green Hill E is the largest site within the Scheme, located 300m east of Green Hill D. It spans 3.2km from north to south and is within Mears Ashby and Wilby parishes in North Northamptonshire.

2.2.59 The site features agricultural fields separated by hedgerows and scattered trees, with some woodland parcels, including Wilby Spinney along the eastern boundary. The topography includes a central plateau bordered by small, steep valleys feeding Swanspool Brook, with elevations ranging from approximately about 75m to 115m AOD. Green Hill E has several existing agricultural access points from nearby roads.

2.2.60 An 11kV overhead power line runs east-west through the centre, south of and parallel to Wilby Road. Green Hill E is situated between several settlements: Mears Ashby to the west, Earls Barton approximately 500m from the southern boundary, Wilby 1.3km to the east, and Wellingborough 2km to the east. There are also a few isolated properties nearby, including The Grange and Wilby Hall. A gas pumping station with a prominent transmission tower is located on the south side of Wilby Road, surrounded by the eastern side of Green Hill E.

2.2.61 Footpath NN|TN|1 is routed through Green Hill E extending from Mears Ashby Road heading north to the village of Mears Ashby. Together with the adjacent Footpath NN|TN|2, these provide foot access from Mears Ashby to the nearby Sywell Country Park and Reservoir. These footpaths also form part of the Northamptonshire Round long-distance route. Footpath NN|TU|3 which links to NN|UL|24 is located within Green Hill E at its northern most point, linking Wilby Hall to Cromwell Spinney on the outskirts of Wellingborough. A dead-end byway NN|TN|10 runs for only 200m from Mears Ashby towards Green Hill E but terminates short of the Green Hill E boundary.

2.2.62 There is an Unnamed Ordinary Watercourse which flows through Green Hill E southwards along the western boundary and then follows around to the southern boundary in an easterly to north easterly direction. A second Unnamed Ordinary Watercourse flows along the whole eastern boundary of Green Hill E before converging with the first Unnamed Ordinary Watercourse 130m south east of

Green Hill E. Once converged, the watercourse becomes Swanspool Brook as it passes under the A4500 Main Road and makes its way past the village of Wilby into Wellingborough, where it adjoins the River Nene.

2.2.63 A network of land drainage ditches is located within Green Hill E. Flows within the ditches are expected to flow in a south-westerly direction based on local topography. All the land drains are ordinary watercourses.

2.2.64 The majority of Green Hill E is situated in Flood Zone 1. However, an area to the western boundary, southern boundary and the south-eastern boundary are within the extents of Flood Zone 3. The EA 'Historical Flood Map' indicates that Green Hill E has not historically flooded and neither has the area immediately surrounding it.

2.2.65 Mears Ashby Conservation Area is located approximately 45m to the south west of Green Hill E at its nearest point. Earls Barton Conservation Area is located approximately 700m to the south of Green Hill E. There is a cluster of 29 listed buildings at the village of Mears Ashby, the nearest being the Grade II listed The Old Farmhouse (NHLE 1371722) approximately 80m west of Green Hill E, and the Grade II listed 5, Duchess End (NHLE 1191195) approximately 85m south of Green Hill E. These are all Grade II listed buildings apart from the Church of All Saints (NHLE 1040692) and Mears Ashby Hall (1040699) which are both Grade II*. There is a cluster of 35 listed buildings at the village of Earls Barton, the nearest being the Grade II listed Rose Cottage (NHLE 171677), and the Grade I listed Church of All Saints (NHLE 1294226) approximately 800m and 900m to the south of Green Hill E respectively. Apart from the latter, all of these are Grade II listed buildings. Sandpit Barn (NHLE 1040780), approximately 450m to the east of Green Hill E, is a Grade II listed building. The Earls Barton motte castle Scheduled Monument (NHLE 1009510) is located approximately 860m to the south of Green Hill E.

2.2.66 Green Hill E is located within one NCA, as defined by Natural England as NCA Profile: 89 Northamptonshire Vales (NE527). Green Hill E is located at the southeastern edge of the NCA Profile: 89 Northamptonshire Vales and borders NCA Profile: 91 Yardley Whittlewood Ridge.

2.2.67 The majority of Green Hill E is located within Northamptonshire LCA 5b Sywell Plateau with the exception of parts of the southern, eastern and western edges, which are partly located within the Northamptonshire LCA 4c Ecton and Earls Barton Slopes as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7).

2.2.68 Sywell Reservoir and Country Park LWS is located 300m west of Green Hill E. The Country Park comprises reservoir and a mosaic of other habitats, including neutral grassland, scrub woodland and swamp edge habitat.

2.2.69 Wilby Meadows Stream LWS is located 700m east of Green Hill E. This is a section of the Wilby Brook that flows through farmland habitats connected to the watercourses bounding the south of Green Hill E and is designated for its water vole colony.

2.2.70 Park Farm Industrial Estate LWS is located 1km north east of Green Hill E. The site contains a mosaic of grassland, scrub and woodland habitats.

2.2.71 Vivians Covert LWS is located 1.3km north east of Green Hill E, a small woodland in which at least seven ancient woodland indicators are present.

2.2.72 Wilby Bay Meadows LWS is located 1.9km to the east of Green Hill E and comprised a neutral grassland lowland meadow. Although poor management has comprised the LWS site, species rich grassland patches and neutral indicator species remain.

Green Hill F

2.2.73 Green Hill F is approximately 275.8 ha in area. Green Hill F consists of agricultural fields in the parishes of Easton Maudit and Bozeat, entirely within North Northamptonshire. Its northwestern boundary follows the parish boundary of Grendon. The site has an irregular shape, stretching approximately 3.8km from north to south.

2.2.74 The area features irregularly shaped fields bounded by hedgerows and scattered trees, with gently rolling hills separated by small streams. The land generally slopes up towards the east and south, with elevations ranging from approximately 55m to 105m AOD. Green Hill F has several existing agricultural access points from nearby roads.

2.2.75 Several overhead electricity transmission lines cross Green Hill F. A 132kV line crosses the northernmost field from northwest to southeast, passing north of Grendon and Bozeat. A 400kV line briefly crosses the southernmost corner, though no pylons are within the site boundary. Green Hill F wraps around the north, east, and south of Easton Maudit village and is less than 300m west of Bozeat, separated by the A509. Nearby properties include Slype House, Oakfield, Home Farm, and Low Farm.

2.2.76 A network of land drainage ditches is located within Green Hill F, as well as three tributaries of an unnamed main river. Flows within the ditches are expected to flow in a northerly direction based on local topography. All the land drains are ordinary watercourses and are therefore the responsibility of the Lead Local Flood Authority to maintain, whereas the main rivers are the responsibility of the EA to maintain.

2.2.77 The majority of Green Hill F is situated in Flood Zone 1. However, the northern and north-western boundaries are shown to be within Flood Zone 3, and sections of the unnamed main river tributaries within Green Hill F are also within the extents of Flood Zone 3. The EA Historical Flood Map indicates that Green Hill F has historically flooded in the north, due to flooding at the River Nene in March 1947.

2.2.78 Easton Maudit Conservation Area is located approximately 10m east of Green Hill F at its nearest point. Grendon Conservation Area is located approximately 850m to the north west of Green Hill F.

2.2.79 There is a cluster of 13 listed buildings in the village of Easton Maudit, the nearest being the Grade II listed The Old Vicarage (NHLE 1040782) approximately 150m

west of Green Hill F. These are all Grade II listed buildings apart from the Church of St Peter and St Paul (NHLE 1189610) which is Grade I listed, and 22 High Street (NHLE 1040784) which is Grade II* listed. To the south of the village, Home Farmhouse (NHLE 1040785) is approximately 25m to the north west of Green Hill F at its nearest point. This Grade II Listed Building has an incorrect grid reference in its NHLE entry which places it approximately 620m further to the north, towards the centre of the village of Eastern Maudit.

2.2.80 There is a cluster of 29 listed buildings in Grendon, the nearest being the grade II listed 29, Chequers Lane (NHLE 1040738) approximately 700m north west of Green Hill F. These are all Grade II listed buildings apart from the Church of St Mary (NHLE 1190552) and Grendon Hall (NHLE 1040746) which are Grade II* listed.

2.2.81 There is a cluster of 16 listed buildings in the village of Bozeat, the nearest being the Grade II listed Bozeat War Memorial (NHLE 1428093) approximately 350m to the east of Green Hill F. These are all Grade II listed buildings apart from the Church of St Mary (NHLE 1040795 which is Grade I listed.

2.2.82 There is a cluster of four Grade II listed buildings at the eastern edge of Castle Ashby Park, the nearest comprising East of Nevitts Lodge (NHLE 1189903), Left Gate pier at East or Nevitt's Lodge (NHLE 1189913) and Right Gate pier at East or Nevitt's Lodge (NHLE 1041611) all approximately 900m to the west of Green Hill F.

2.2.83 Low Farmhouse (NHLE 1371681) is approximately 110m to the south-west of Green Hill F at its nearest point and is a Grade II listed building.

2.2.84 Greenfield Lodge (NHLE 1040669) is approximately 635m to the north east of Green Hill F and is a Grade II listed building.

2.2.85 Aerial photography indicates that Easton Lodge Scheduled Monument (NHLE 1003876) is approximately 25m to the south of Green Hill F.

2.2.86 Green Hill F is located within one NCA defined by Natural England as NCA Profile: 91 Yardley-Whittlewood Ridge (NE501).

2.2.87 A further two NCAs are located within 2km of Green Hill F and include NCA Profile: 89 Northamptonshire Vales (NE527) to the north and NCA Profile: 88 Bedfordshire and Cambridgeshire Claylands (NE555) to the south.

2.2.88 The northern portion of Green Hill F is located within the Northamptonshire LCA 4c Ecton and Earls Barton Slopes. The remaining extent of Green Hill F is primarily located within Northamptonshire LCA 8b Salcey Forest and Yardley Chase. A very small portion of Green Hill F is located within the Northamptonshire LCA 6c Bozeat Claylands as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7).The Upper Nene Valley Gravel Pits SPA and Ramsar site is located approximately. 2km north-west of Green Hill F. The internationally important site comprises a chain of exhausted sand and gravel pits, extending for approximately 35km along the alluvial deposits of the River Nene floodplain running from Clifford Hill on the southern outskirts of Northampton, downstream to Thorpe Waterville north of Thrapston. An extensive mosaic of wetland habitats is regularly used by over 20,000 wildfowl and wading

birds and supports major overwintering bird assemblages. Qualifying features of the designated site include bittern and golden plover (both Annex 1 species), in addition to gadwall (migratory species).

2.2.89 Bozeat Meadow SSSI is located approximately 70m east of Green Hill F, beyond the A509. This protected site comprises unimproved grassland on well drained clay and loam soils. Diverse botanical communities are present across medieval ridge and furrows.

2.2.90 Summer Leys LNR is located 2.7km north of Green Hill F. This is an excellent nature reserve easily qualifying as a LWS with fen, swamp and marsh indicators recorded within the gravel pits and neutral grassland indicators in the surrounding grasslands.

2.2.91 Bozeat Cemetery LWS is located 280m to the east of Green Hill F. This cemetery contains areas of species rich meadow. Bozeat Glebe Meadow LWS is located 510m to the east of Green Hill F. This is a former hay meadow that has still retained a decent meadow flora, in particular on the slopes. Bozeat Verge LWS is located 15m to the south of Green Hill F. This is a species rich wildflower verge formed on the road cutting of the A509 to the west of Bozeat. Bozeat Wood LWS is located 620m to the south-east of Green Hill F. This is a small oak-ash woodland, possibly ancient in origin, with an interesting ground flora.

2.2.92 Castle Ashby Parkland LWS is located 1.3km west of Green Hill F. Situated centrally within the Castle Ashby parkland, this woodland extends between the church, ponds and boathouse. The LWS hosts a large variety of parkland and semi-natural species, and a largely semi-natural ground flora but with several ancient woodland species have been recorded, alongside some unusual parkland additions.

2.2.93 Castle Ashby Woodland LWS is located 2km north west of Green Hill F. This area of old woodland, probably originating from the establishment of Castle Ashby parkland, is well-established and supports some unusual flora and a range of invertebrates.

2.2.94 Cold Oak Copse LWS is located 310m to the west of Green Hill F. This site is listed on the Northants Ancient Wood inventory, with six ancient woodland indicators recorded.

2.2.95 Grendon Quarter Pond LWS is located 1.5km north west of Green Hill F and comprises a large fishing lake with a fringe of marginal vegetation and a surround of tall trees.

2.2.96 Horn Wood LWS is adjacent to the south eastern boundary of Green Hill F. This site qualifies as a LWS with 14 ancient woodland indicators recorded.

2.2.97 Long Furlong and Old Pastures LWS is located 490m to the south-west of Green Hill F. This is a large area of replanted ancient woodland, with 16 ancient woodland indicators recorded.

2.2.98 Menagerie Pond LWS is located 1.2km west of Green Hill F. Areas of thick fringing emergent vegetation and occasional aquatic plants support diverse

invertebrate communities associate with the lake situated within Castle Ashby parkland.

2.2.99 Par Pond LWS is located 1.1km west of Green Hill F. This is a long lake on the edge of Castle Ashby Park, well-vegetated with emergent and marginal vegetation and surrounded by parkland habitats.

2.2.100 Scotland Pond LWS is located 1.7km west of Green Hill F. This is a large angling lake fringed with marginal and emergent vegetation.

2.2.101 The Basin LWS is located 1.9km north-west of Green Hill F. This is a narrow lake within the Castle Ashby Estate, with a good cover of emergent and marginal vegetation providing habitat for birds and amphibians.

2.2.102 Threeshire Wood LWS is located 1.6km south east of Green Hill F. This is an ancient semi-natural woodland with a good range of ground flora species.

2.2.103 Warren Ponds LWS is located 1.3km to the west of Green Hill F. These ponds extend the habitat of Par Pond LWS and provide cover for birds and amphibians. Some of the ponds within Warren Ponds LWS are of significance as an extension to the wetland habitat corridor network.

2.2.104 Yardley Brook Field LWS is located 590m to the west of Green Hill F. This field has areas of species rich calcareous grassland associated with the old earthworks.

Green Hill G

2.2.105 Green Hill G is approximately 170.9 ha in area. Green Hill G lies entirely within the City of Milton Keynes, near the tripoint of North Northamptonshire, Milton Keynes, and Bedford Borough. It features open agricultural fields separated by hedgerows and scattered trees, with substantial woodland (Threeshire Wood) to the northeast. The land slopes gently from north to south, ranging from approximately 70m to 105m above ordnance datum AOD, with a shallow valley and small stream running through the centre. Green Hill G has a main access from the A428.

2.2.106 A 400kV overhead power line crosses the southern half of Green Hill G. The village of Lavendon is approximately 500m south east, while the hamlet of Warrington has a few dispersed properties to the west and south. Bozeat is 2.4km north, and Olney is 2.6km southwest. There are a few isolated properties, including Northey Farm to the northwest, and a petrol station to the southwest, accessible via the Warrington Toll Bar Roundabout.

2.2.107 Bridleway MK|Lavendon|002 and Bridleway MK|Lavendon|015 form a continuous north-south route along most of the eastern boundary of Green Hill G, including the length of Tinick Lane. The bridleway continues in both directions beyond Green Hill G towards Hinwick to the north, and Clifton Reynes to the south. This route forms part of the Three Shires Way.

2.2.108 Bridleway MK|Lavendon|014 links Tinick Lane to Castle Road along the northern boundary of Field GF13, while Bridleway MK|Lavendon|004 links Bridleway MK|Lavendon|002 to Castle Road via the north of field GF9.

2.2.109 There is a network of land drains which join and flow southwards through the centre of Green Hill G. The land drains become a more rational watercourse flowing through Lavendon to the south and ultimately discharges to the River Great Ouse. Flows within the ditches are expected to flow in a south-westerly direction based on local topography.

2.2.110 Fluvial flooding could occur if the land drains overtopped their banks during or following an extreme rainfall event.

2.2.111 The majority of Green Hill G is situated in Flood Zone 1 and therefore has less than a 1 in 1,000 annual probability of river or sea flooding. However, a limited area to the southern boundary is identified as being in Flood Zone 3, associated with the land drain and unnamed Ordinary Watercourse. The EA Historical Flood Map indicates that Green Hill G has not historically flooded and neither has the area immediately surrounding Green Hill G.

2.2.112 Lavendon Conservation Area is located approximately 575m to the south east of Green Hill G. There are no other Conservation Areas within 2km.

2.2.113 There is a cluster of 13 listed buildings with the village of Lavendon, all of which are located within the Conservation Area, the nearest being at 33 Northampton Road (NHLE 1212621) which is located approximately 600m to the south east of Green Hill G. These are all Grade II listed buildings apart from the Church of St Peter and St Michael (NHLE 1212619) which is Grade I listed.

2.2.114 There is also a cluster of five Grade II listed buildings at Lavendon Grange, the nearest being Lavendon Grange (1289456) itself which is approximately 845m to the southeast of Green Hill G. Home Farmhouse (NHLE 128918) is approximately 700m to the southwest of Green Hill G and is a Grade II listed building. Warrington House Farm (NHLE 1289233) is located approximately 800m to the south-west of Green Hill G and is a Grade II listed building.

2.2.115 The Lavendon Castle: a motte and bailey and associated enclosures at Castle Farm Scheduled Monument (NHLE 1009542) is located approximately 300m to the east of Green Hill G. The Bury: a ringwork and associated earthworks 100m north of Lavendon Church Scheduled Monument (NHLE 1011295) is located approximately 600m to the south-east of Green Hill G.

2.2.116 Green Hill G is located within two NCAs as defined by Natural England as NCA Profile: 91 Yardley-Whittlewood Ridge (NE501) and NCA Profile: 88 Bedfordshire and Cambridgeshire Claylands (NE555).

2.2.117 Green Hill G is located primarily within Milton Keynes LCA 2a Ouse Northern Undulating Slopes with the northern extent of the Site located within Milton Keynes LCA 1a Yardley Chase Wooded Wolds, as set out in the Milton Keynes Landscape Character Assessment 2022 (Ref.8).

2.2.118 The Upper Nene Valley Gravel Pits SPA and Ramsar site is located approximately 6.2km north of Green Hill G The site comprises a chain of exhausted sand and gravel pits, extending for approximately 35km along the alluvial deposits of the River Nene floodplain running from Clifford Hill on the southern outskirts of Northampton, downstream to Thorpe Waterville north of Thrapston. An extensive mosaic of wetland habitats is regularly used by over

20,000 wildfowl and wading birds and supports major overwintering bird assemblages. Qualifying features of the site include bittern and golden plover in addition to gadwall (migratory species).

2.2.119 Bozeat Meadow SSSI is located 2.9km north of Green Hill G. This protected site comprises unimproved grassland on well drained clay and loam soils. Diverse botanical communities are present across medieval ridges and furrows.

2.2.120 Dungee Corner Meadow SSSI is located 4.2km north east of Green Hill G. The well drained hay meadow on boulder clay is traditionally managed, including no use of artificial fertilisers or herbicides, and with diverse flora. A population of locally rare green-winged orchids are also present.

2.2.121 Yardley Chase SSSI is approximately 3.8km west of Green Hill G. Military use of the SSSI site has resulted in a long absence of intensive agriculture, supporting the retention of diverse semi-natural habitats (woodland and unimproved grassland) present and increased value for invertebrates. This includes 30 breeding butterfly species records.

2.2.122 Bozeat Wood is located 300m to the north of Green Hill G. This is a small oak-ash woodland, possibly ancient in origin, with associated ground flora.

2.2.123 Horn Wood is located 1.4km to the north of Green Hill G. This site qualifies as a LWS with 14 ancient woodland indicators recorded.

2.2.124 Lavendon Wood is located 700m to the east of Green Hill G. This is an ancient semi-natural woodland with a good range of ground flora species.

Green Hill BESS

2.2.125 Green Hill BESS is 43.3 ha in area. The two agricultural fields of Green Hill BESS are bound by substantial hedgerows and tree belts, located entirely within the parish of Grendon, North Northamptonshire. The land is largely flat at an elevation of approximately 50m AOD, situated at the edge of the River Nene valley floor. The area is dominated by the Grendon Substation and its associated tree planting, with flooded remnants of gravel and sand quarries to the north.

2.2.126 Several overhead lines (OHLs) cross the site. The northern field contains a 400kV National Grid OHL and a 132kV distributor OHL. Two more 132kV OHLs cross the proposed access to the northern field near Pastures Farm, and another 132kV OHL crosses the southern field. The village of Grendon is approximately 600m southeast of Green Hill BESS, and Pastures Farm, to the west, includes existing farm access as a potential access point to the north of Green Hill BESS.

2.2.127 There is one public right of way directly adjacent to Green Hill BESS, north of the existing Grendon Substation. Footpath NN|TF|3 originates northwest of the Grendon Substation at Station Road near to the bridge over the River Nene, passing north of Green Hill BESS enroute to Lower End, Grendon.

2.2.128 The nearest watercourse is Whiston Brook, an EA main river that is located to the northwest of the Field BESS 2 within the Green Hill BESS1. Whiston Brook is a tributary of the River Nene, also a main river, situated approximately 3.7km north west of BESS 2 at its closest point.

2.2.129 A further EA main river named Grendon Brook flows in a northerly direction and forms the eastern boundary of Field BESS 1 within the BESS Site. Whiston Brook and Grendon Brook flow in a general north-eastern direction before they all converge into the River Nene approximately 1km from the Site.

2.2.130 Fluvial flooding could occur if the land drains overtopped their banks during or following an extreme rainfall event. The EA Historical Flood Map indicates that Fields BESS 1 has historically flooded in March 1947 due to the River Nene.

2.2.131 There is one public right of way directly adjacent to Green Hill BESS, north of the existing Grendon Substation. Footpath NN|TF|3 originates northwest of the Grendon Substation at Station Road near to the bridge over the River Nene, passing north of Green Hill BESS enroute to Lower End, Grendon.

2.2.132 The nearest watercourse is Whiston Brook, an EA main river that is located to the northwest of Green Hill BESS. Whiston Brook is a tributary of the River Nene, also a main river, situated approximately 650m north of the site at its closest point.

2.2.133 A further EA main river named Grendon Brook flows in a northerly direction and forms the eastern boundary of Field BESS 1 field within the BESS Site. Whiston Brook and Grendon Brook flow in a general north-eastern direction before they all converge into the River Nene approximately 1km from the site. Fluvial flooding could occur if the land drains overtopped their banks during or following an extreme rainfall event. The EA Historical Flood Map indicates that Field BESS 1 has historically flooded in March 1947 due to the River Nene.

2.2.134 Grendon Conservation Area is located approximately 530m to the south east of Green Hill BESS at its nearest point. There is a cluster of 29 listed buildings in Grendon, the nearest being the Grade II listed Gates and Gatepiers approximately 10m east of Grendon Hall (NHLE 1190676) approximately 590m east of the Green Hill BESS. These are all Grade II listed buildings apart from the Church of St Mary (NHLE 1190552) and Grendon Hall (NHLE 1040746) which are Grade II*. Station Lodge (NHLE 1294156) approximately 200m to the west of Green Hill BESS is a Grade II listed building.

2.2.135 Green Hill BESS is located within one NCA, defined by Natural England as NCA Profile: 89 Northamptonshire Vales (NE527).

2.2.136 Green Hill BESS is located at the southeastern edge of the NCA Profile: 89 Northamptonshire Vales (NE527) and borders NCA Profile: 91 Yardley Whittlewood Ridge (NE501).

2.2.137 Green Hill BESS is located within two Regional LCTs: LCT Profile: 18 Broad River Valley Floodplain; and LCT Profile 12 Limestone Valley Slopes as defined by Northamptonshire Council Current Landscape Character Assessment 2003 (Ref.7). These are broken down into two LCAs: LCA Profile: 18d The Nene - Billing Wharf to Woodford Mill; and LCA Profile: 12a Wollaston to Irchester.

2.2.138 Grendon Lakes LWS is located 200m north of the Green Hill BESS. This is a mosaic of wetland habitats of huge importance to over-wintering birds.

2.2.139 Grendon Lakes North LWS is located 500m north of the Green Hill BESS. This is also a mosaic of wetland habitats including a number of small gravel pits, fragments of wet grassland and mire and good aquatic vegetation.

2.2.140 Grendon Quarter Pond LWS is located 500m south of the Green Hill BESS and comprises a large fishing lake with a fringe of marginal vegetation and a surround of tall trees.

2.2.141 Earls Barton Meadow LWS is located 700m north west of the Green Hill BESS. This floodplain meadow site is adjacent to the River Nene, near to gravel extraction, and features neutral grassland indicators and many elements of MG4 grassland communities indicative of well-drained permanent pasture and meadows.

2.2.142 Earls Barton Carr LWS is located 800m north west of the Green Hill BESS. This large area of wet woodland on former gravel workings adjacent to the Nene supports at least 10 indicator species of fen, swamp and marsh habitats, despite declining habitat condition.

2.2.143 Earls Barton Lock Lake LWS is located 800m north of the Green Hill BESS and comprises another Nene Valley gravel pit with abundant marginal vegetation.

2.2.144 Scotland Pond LWS is located 800m south of the Green Hill BESS. This is a large angling lake fringed with marginal and emergent vegetation.

2.2.145 The Basin LWS is located 1km south of the Green Hill BESS. This is a narrow lake within the Castle Ashby Estate, with a good cover of emergent and marginal vegetation providing habitat for birds and amphibians.

2.2.146 Menagerie Pond LWS is located 1.3km south of the Green Hill BESS. Areas of thick fringing emergent vegetation and occasional aquatic plants support diverse invertebrate communities associate with the lake situated within Castle Ashby parkland.

2.2.147 Castle Ashby Woodland LWS is located 1.4km south west of the Green Hill BESS. This area of old woodland, probably originating from the establishment of Castle Ashby parkland, is well-established and supports some unusual flora and range of invertebrates.

2.2.148 Castle Ashby Parkland LWS is located 1.7km south west of the Green Hill BESS. Situated centrally within the Castle Ashby parkland, this woodland extends between the church, ponds and boathouse. A large variety of parkland and semi-natural species, and a largely semi-natural ground flora but with several ancient woodland species have been recorded, alongside some unusual parkland additions.

2.2.149 Par Pond LWS is located 1.5km south of the Green Hill BESS. This is a long lake on the edge of Castle Ashby Park, well-vegetated with emergent and marginal vegetation and surrounded by parkland habitats.

2.2.150 Ecton Gravel Pits LWS is located 1.7km north west of the Green Hill BESS. This site comprises three gravel pits alongside the River Nene. The pits vary in size and shape and provide a mixture of wildlife habitats.

2.2.151 Engine Pond LWS is located 1.9km south west of the Green Hill BESS. This is a well-established pond, with emergent vegetation and abundant dragonflies and damselflies.

2.2.152 Hardwater Meadows LWS is located 2km north east of the Green Hill BESS and comprises a network of fields adjacent to the River Nene. Species-rich wetland vegetation surrounds the pond and old river channels.

2.2.153 Warren Ponds LWS is located 2km south of the Green Hill BESS. These ponds extend the habitat of Par Pond LWS and provide cover for birds and amphibians. Some of the ponds within Warren Ponds LWS are of significance as an extension to the wetland habitat corridor network.

Cable Route Corridor

2.2.154 The Cable Route Corridor will comprise underground electrical cables to connect the Sites to the Point of Connection (PoC) at Grendon Substation. The underground cables will also transfer electricity from the National Grid to the BESS. The route and location of the Cable Route Corridor is shown on Location Plan **[REP3-004]**. The Cable Route Corridor connects the Sites and runs in a north to south orientation. The Cable Route Corridor briefly runs west to Green Hill B.

2.2.155 The total length for the Cable Route Corridor is approximately 31km and the area is within the area within the Order Limits associated with the Cable Route Corridor is approximately 168.3 ha. Cables, ranging in voltages from 11kV to 400kV, will be located within the Sites and the Cable Route Corridor. The Cable Route Corridor has a typical width of 50m, however the Cable Route Corridor incorporates a number of wider areas, for example to allow additional working area for trenchless techniques. The Cable Route Corridor also narrows at certain points to avoid sensitive receptors such as habitat designations.

2.2.156 The Cable Route Corridor crosses predominantly agricultural land whilst also adopting a route of least resistance in order to avoid unnecessary disruption or severance of land or ecological features. The cable will need to cross a number of obstacles via the use of horizontal directional drilling. The cable route will need to cross a range of existing infrastructure such as major roads, minor roads and tracks, PRoW, existing buried/underground utilities (such as medium and high-pressure gas mains), rivers, field drains and main drains. Smaller drilling sections may be required for crossing other features such as roads and ditches.

Additional Areas within the Order Limits

2.2.157 The Order Limits contain the full land area required to develop, operate, maintain and decommission the Scheme. As such, these also include all access points, visibility splays and land required for the transportation of ‘abnormal indivisible loads’. Where necessary, appropriate applications and notifications, in accordance with the Outline Construction Traffic Management Plan **[EX6/GH7.9_C]**, will be made by the contractor in advance of the delivery of abnormal load.

2.2.158 As part of the construction management measures, a traffic management for abnormal load movements will be agreed with the local highway authority and

police prior to the abnormal load movements taking place. The use of temporary traffic management to construct, and where required, manage construction accesses will be considered on a site-by-site basis and agreed with the highway authorities.

2.3 Relevant Planning History

2.3.1 The relevant planning history of the land within the Order Limits is limited due to the predominantly agricultural use of the land. Planning history searches of the web portals for North Northamptonshire Council, West Northamptonshire Council, and Milton Keynes City Council were undertaken for the Sites and Cable Route Corridor and are contained within **Appendix A: Planning Application History Search – Green Hill Sites including Cable Route Corridor**. These appendices are complementary to, compiled within and are to be read alongside this Planning Statement.

2.3.2 There are no significant implications arising from the location of the Scheme, upon any of the identified planning permissions.

3 The Scheme

3.1 Introduction

3.1.1 This section describes the Scheme and its main components. It describes the components of the development and describes the activities that would take place during the construction, operational and decommissioning phases of the Scheme.

3.1.2 A full description of the proposed Scheme is provided in Chapter 4 of the ES **[EX6/GH6.2.4_B]**.

3.2 Components of the Scheme

3.2.1 All of the works that are part of the Scheme are listed in Schedule 1 of the draft DCO **[EX6/GH3.1_E]**. A summary of the work packages is set out below. The extent of each Work Number is shown on the Works Plans **[EX6/GH2.4_G]**.

- Work No. 1: Solar Photovoltaic Generating Station known as 'Green Hill A to G'.
- Work No. 2: Energy Storage Facility at Green Hill BESS with option to also install BESS at Green Hill C.
- Work No. 3: Works in connection with on-site substations at each Site including:
  - Work No. 3A — substations up to 400 kV;
  - Work No. 3B — substations up to 132 kV; and
  - Work No. 3C — substations up to 33kV.
- Work No. 4: Works at the National Grid Grendon Substation to facilitate the grid connection.
- Work No. 5: Grid connection cable works between the nine Sites and connecting to the National Grid Grendon Substation including works to lay electrical cables, accesses, and temporary construction laydown areas for the electrical cables.
- Work No. 6: Works associated with each of the Sites including fencing, gates, boundary treatment and other means of enclosure; the provision of security and monitoring measures such as CCTV columns, lighting columns and lighting, cameras, weather stations, communication infrastructure, and perimeter fencing; landscaping and biodiversity mitigation and enhancement measures including planting; improvement, maintenance and use of existing private tracks; laying down of internal access tracks, ramps, means of access, footpaths, cycle routes and roads, including the laying and construction of drainage infrastructure, signage and information boards; temporary footpath diversions; earthworks; SuDs Ponds, runoff outfalls, general drainage and irrigation infrastructure and improvements or extensions to existing drainage and irrigation systems; electricity and telecommunications connections; and secondary temporary construction compounds.

- Work No. 7: Temporary construction and decommissioning laydown areas within each of the Solar Farm Sites and works associated with these including areas of hardstanding; car parking; site and welfare offices and workshops; security infrastructure, including cameras, perimeter fencing and lighting; area to store materials and equipment; site drainage and waste management infrastructure (including sewerage); and electricity, water, wastewater and telecommunications connections.
- Work No 8: Works to facilitate both temporary construction access, and permanent access to the Sites and Cable Route Corridor.
- Work No. 9: Works to create and maintain habitat management areas.
- Work No.10: Creation of permissive paths.

3.3 Construction Period Activities

3.3.1 The Scheme's temporal timescales (construction, operation and decommissioning) are as follows:

3.3.2 The Scheme currently has a grid connection date of 2029. It is currently anticipated that construction works will commence, at the earliest, in 2027 and will run to 2029. As such, the construction programme for the entire Scheme is anticipated to be 24 months with the potential likelihood of overlapping construction works on the different Sites. This is anticipated to be as follows:

Table 1: Indicative Construction Programme

	Months																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
Green Hill A	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■								
Green Hill A.2	■	■	■	■	■	■	■	■	■	■															
Green Hill B										■	■	■	■	■	■	■	■	■	■	■					
Green Hill C Solar	■	■	■	■	■	■	■	■																	
Green Hill C BESS								■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Green Hill D					■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■		
Green Hill E	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■			
Green Hill F	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■		
Green Hill G	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■							
Green Hill BESS								■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Northern Cable Route Corridor Works								■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Southern Cable Route Corridor Works																						■	■	■	■

3.3.3 Main construction laydown areas (sometimes referred to as 'construction compounds') will be located within each Solar Farm Site as indicated on the Works Plans (Work No.7) **[EX6/GH2.4_G]**. Construction laydown areas will also be established at locations along the Cable Route Corridor as shown as Work No.5 on the Works Plans **[EX6/GH2.4_G]**. The Site laydown areas will consist of compounds of approximately 13000m^2 and will contain offices, mobile welfare units, canteens, storage and waste skips, parking areas and space for storage, download and turning area.

3.3.4 There will also be secondary temporary laydown areas progressively established across the Solar Farm Site in each working area. These will be located across the Solar Farm Site and the purpose of each one will be to service the local works. This includes storage for materials, fuel, equipment etc. needed for such works as well as welfare facilities, office space etc. required to avoid unnecessary internal movement of personnel over long distances. The secondary laydown areas will typically be set up ahead of the installation of the PV Arrays, electrical components and cabling, and will be decommissioned as the relevant works in their locality progress and become completed.

3.3.5 Construction activities are likely to be carried out Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays. However, some activities may be required outside of these times (such as the delivery of abnormal loads, night-time working for cable construction works in public highways or horizontal direction drilling activities). Where possible, construction deliveries will be coordinated to avoid HGV movements during the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00).

Construction Environmental Management Plan

3.3.6 A Construction Environmental Management Plan (CEMP) will be submitted to and approved by the relevant planning authority, and this will be secured by the Requirements in the as secured in the draft DCO **[EX6/GH3.1_E]**. The CEMP for each phase will be substantially in accordance with the Outline Construction Environmental Management Plan **[EX6/GH7.1_C]** submitted as part of the DCO application. This will ensure the potential construction impacts are minimised.

3.3.7 The CEMP will outline the allocated responsibilities, procedures and requirements for the Sites' environmental management. It includes relevant Site-specific method statements, operating practices, and arrangements for monitoring and liaison with local authorities and stakeholders.

3.3.8 The Applicant would ensure through the terms of the construction contract that the main contractors undertaking the construction of the Scheme would comply with the CEMP, allocate environmental management responsibilities to a Site manager and ensure that all sub-contractors' activities are effectively managed in accordance with the CEMP.

Operation

3.3.9 The Scheme is estimated to commence operation at the end of Q4 2029. The Scheme must be decommissioned no later than 60 years from the date of final

commissioning and decommissioning is therefore estimated to be no later than 2089.

3.3.10 Once the Scheme is operational, traffic generated by it will be limited to that associated with occasional maintenance work.

3.3.11 Movement within the Sites for day-to-day operating and maintenance will be by way of quad bike or small, farm utility vehicles. This will be secured via the Outline Operational Environmental Management Plan **[EX6/GH7.2_D]**. Personnel will visit the Sites from time to time to check the apparatus. No on-site staff will be required to operate the Scheme but there will be limited staff facilities located in the control rooms associated with the substations. Some permanent equipment for monitoring the Sites will be located in the Relay and Control Room. Whilst this would typically be accessed remotely, it would be available for occasional physical access during routine visits.

3.3.12 Noise impact is largely limited to the construction phase of the development. There would be a small amount of noise generated by the vehicle movements across the Sites coupled with the installation of equipment. There will be some noise transmitted from the transformers, substations, tracking panels and energy storage but these levels are predicted to be low and are addressed in full in ES Chapter 14: Noise and Vibration **[APP-051]**.

3.3.13 Across the 60-year lifetime of the Scheme, it is expected that alongside the regular maintenance of equipment, infrastructure such as panels and batteries will require replacement. As Scheme components approach the end of their design life, an evaluation will be conducted to determine if they require maintenance or replacement across the Scheme. It is not expected that an extensive replacement of all components will be required across the entirety of the Scheme during one period; instead, the programme for replacement of equipment across the Scheme is anticipated be staged to maintain the electrical export to the National Grid. However, in order to maximise the flexibility for how a programme of replacements may be conducted, for example to coincide with planned repairs to the grid infrastructure, each ES chapter **[APP-044** to **APP-061**] has considered the relevant worst-case scenario.

Decommissioning

3.3.14 As the Scheme must be decommissioned no later than 60 years from the date of final commissioning, decommissioning is therefore estimated to be no earlier than 2069 and no later than 2089. Decommissioning is expected to take between 12 and 24 months. A 24-month decommissioning period has been assumed for the purposes of a worst-case assessment in the ES, unless specifically stated otherwise. The decommissioning of the Scheme is secured via a Requirement in the draft DCO **[EX6/GH3.1_E]**.

3.3.15 The Decommissioning Plan for each Site or phase of decommissioning will be in accordance with the Outline Decommissioning Statement **[EX6/GH7.3_C]**. This will ensure the potential decommissioning impacts are minimised.

3.3.16 The solar modules and related built infrastructure, ancillary infrastructure, substations and energy storage will be removed and recycled or disposed of in accordance with good practice and market conditions at that time.

3.3.17 The underground ducting within the Cable Route Corridor will be decommissioned but may be left in-situ to avoid unnecessary intrusion. It is possible to remove the cable itself by extracting it at the joint bays from within the ducting so that the cable can be recycled.

Waste

3.3.18 Waste will be generated during all phases of the development. Solid waste materials generated during construction and decommissioning will be segregated and stored on site prior to transport to an approved, licensed third party landfill and recycling facility. Waste arisings are set out in ES Chapter 24: Other Environmental Matters **[REP1-027]**.

Site Reinstatement

3.3.19 The solar modules and related built infrastructure, ancillary infrastructure, substations and energy storage will be removed and the Sites returned to the landowners. This will include the areas of agricultural land where the agricultural resource has been maintained (and potentially improved) during operation, and the established habitats. Post-decommissioning, the landowners may return the Sites to arable use, although it is assumed that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

3.3.20 The underground cable, cable ducts and joint bays will be decommissioned in accordance with the applicable guidance and regulations at the time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route.

3.3.21 Foundations and other below ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed. Areas of planting and habitats will be maintained by the Applicant until the point of handover to the landowner.

3.3.22 Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to the relevant local authority in accordance with the approved Decommissioning Environmental Management Plan.

3.3.23 Some soil profiling may be required, and the land will be contoured in accordance with the approved Decommissioning Environmental Management Plan.

3.3.24 If necessary, the soil will be tilled to mitigate for any compaction. Areas where grass does not exist because of the footprint of the previous infrastructure (e.g., the BESS and on-site substations) shall be reseeded with suitable native species,

in liaison with the landowner and in accordance with the approved Decommissioning Environmental Management Plan, in order to integrate the newly restored soil into the future land-use.

3.3.25 Further detail is set out in the Outline Decommissioning Statement **[EX6/GH7.3_C]**. A Decommissioning Environmental Management Plan (DEMP), to include timescales and transportation methods, will be secured by a Requirement in the DCO and approved by the relevant planning authority.

4 Need and Benefits

4.1 Introduction

4.1.1 This section presents a high-level summary of the need for the Scheme. It uses non-technical language and outlines the practical reasons as to why large-scale solar developments, and the Scheme, are needed. Section 4.6 lists some of the other benefits of the Scheme and Section 4.7 describes proposals for a Community Liaison Group (CLG). Although it does not form part of the application, Section 4.8 outlines proposals for a community benefit fund.

4.1.2 The principal need for the Scheme is centred on the significant contribution it will make to the three important national energy policy aims of:

- Decarbonisation – achieving Net Zero carbon emissions by 2050, requiring deployment of zero-carbon electricity generation at scale. The Scheme will generate large-scale low carbon electricity which could be operational by 2029.
- Security of supply – geographically and technologically diverse supplies. The Scheme will contribute to security of supply due to its large scale; predictable output; ability to complement other renewables; and the efficient opportunity to integrate Energy Storage.
- Affordability - The Scheme will provide large-scale generation at low cost which will provide value for money for end-use consumers.

4.1.3 This need is also in the context that the above objectives will need to be delivered during a period where there will be an increasing level of demand for electricity.

4.1.4 The Statement of Need **[APP-556]** accompanying the DCO application sets out a detailed compelling case for why the Scheme is urgently required and at the scale proposed.

4.2 Meeting an Increasing Demand for Electricity

4.2.1 As explained in Section 5 of the Statement of Need **[APP-556]** demand for electricity across England, Wales and Scotland is expected grow in the years ahead for the following reasons:

- The switching of sources of final-use power for heating and transport from carbon-intensive sources to electricity will increase demand;
- Carbon-intensive sources of energy are displaced by electrification of other industry sectors, or production of non-carbon energy vectors by use of electricity;
- The least-cost energy efficiency measures, such as introduction of low-voltage LEDs for lighting, have now been implemented across business and domestic sectors; and
- Economic restructuring away from manufacturing to a service-based economy has largely occurred, however the growth of new high technology and highly skilled manufacturing, both contributing to national economic

growth and prosperity, is likely to place additional pressures on the electricity sector.

4.2.2 The above is consistent with the observations provided by National Grid Electricity System Operator (NGESO) in their Future Energy Scenarios 2024. The government's Clean Power 2030 Action Plan published in 2024 also identifies that meeting a possible doubling of electricity demand by 2050 by stating

"Electrification and other needs for clean power as part of net zero are likely to result in at least a doubling of electricity consumption compared to today, with even larger amounts required if there are significant roles for electricity-intensive decarbonisation routes such as green hydrogen and e-fuels for aviation and maritime. This will require strong growth in power generation from a diverse range of clean sources on a sustained basis through the 2030s and 2040s."

4.2.3 To enable decarbonisation and achieve net zero by 2050, as required by legislation and policy, Section 5 of the Statement of Need **[APP-556]** identifies that the power generation sector must urgently both increase in capacity and reduce in carbon intensity on an unprecedented scale.

4.3 Need for Decarbonisation

4.3.1 The UK is legally bound through the Climate Change Act (2008) (Ref.9) (CCA 2008) to reduce carbon emissions. The CCA 2008 is underpinned by further legislation and policy measures which have developed in the last 13 years. This has been based on an increased need and urgency for decarbonisation to meet the UK's obligations under the Paris Agreement (2015).

4.3.2 In October 2018, following the adoption by the UN Framework Convention on Climate Change of the Paris Agreement, the Intergovernmental Panel on Climate Change (IPCC) published a Special Report on the impacts of global warming of 1.5°C above pre-industrial levels. This report concluded that human-induced warming had already reached approximately 1ºC above pre-industrial levels, and that without a significant and rapid decline in emissions across all sectors, global warming would not be likely to be contained, and more urgent international action is required.

4.3.3 As a result of its commitments to the Paris Agreement, in June 2019 the UK became the first major economy to legislate for a 2050 net zero Green House Gas (GHG) emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. This made decarbonisation a legal requirement.

4.3.4 The Climate Change Committee (CCC), a national independent advisory committee, made clear in its Progress Report to Parliament in 2019 (Ref.10) that the UK is not on track to meet its fourth (2023-2027) or fifth (2028-2032) carbon budget. This position was reinforced in the latest 2024 report which states that:

"Urgent action is needed to get on track for the UK's 2030 target … only a third of the emissions reductions required to achieve the 2030 target are currently covered by credible plans. Action is needed across all sectors of the economy, with low carbon technologies becoming the norm." (Ref.11, p8) and

"The UK should now be in a phase of rapid investment and delivery … Annual offshore wind installations must increase by at least three times, onshore wind installations will need to double and solar installations must increase by five times." (Ref.11, p9)

4.3.5 In the 2024 updated report (2024) (Ref.11), he Committee's assessment also implies that plans to achieve emissions reductions beyond 2030 are not yet credible and therefore that schemes which come forwards which will help deliver those reductions in that timeframe are also needed.

4.3.6 To deliver this, the Committee recommend that:

- Annual offshore wind installations must increase by at least three times, onshore wind installations will need to double, and solar installations must increase by five times;
- Approximately 10% of existing homes in the UK will need to be heated by a heat pump, compared to only approximately 1% today; and
- The market share of new electric cars needs to increase from 16.5% today to nearly 100%.

4.3.7 UK governmental objectives are to ensure the supply of energy to the national energy system always remains secure, reliable, affordable, and consistent with meeting legally binding GHG emissions including the Nationally Determined Contribution (NDC) (Ref.12). EN-1 (2023) (Ref.1) states that government has identified that this will require a step change in the decarbonisation of the UK's energy system and large-scale ground mounted solar has an important role to play in the UK.

4.3.8 In December 2024, government published the Clean Power 2030 Action Plan (Ref.4). Clean Power 2030 is a step in the UK's journey to achieving its energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. This plan explains the need for a rapid expansion in the UK's low carbon electricity generation capacity, and sets out the actions the government proposes to take to deliver that capacity against the timeframes required.

4.3.9 The government has explained that achieving Clean Power by 2030 (Ref.4) is of critical importance and the Action Plan delivers a mechanism to prioritise near-term actions in support of that aim. However, the need for new clean power does not stop at 2030. The continued delivery of low carbon generation facilities beyond 2030 is necessary to meet future electricity demand growth and achieve essential wider societal carbon savings. It is also important to continue to bring forward schemes in the event that 'Clean Power by 2030' is not achieved, as is also foreseen by flexibility included in the government's Action Plan.

4.3.10 Paragraph 4.1.3 of EN-1 (2023) (Ref.1) sets out the presumption in favour of granting consent. It states that, given the level of need for energy infrastructure, if the development proposal is in accordance with the November 2023 NPS and any relevant technology specific NPS, then the Secretary of State should start with the presumption that consent should be given, except to the extent that any

of the exceptions set out in the Planning Act apply. These exceptions are set out in paragraph 1.1.4 of EN-1 (2023) and include if the development would:

- Lead the UK being in breach of its international obligations;
- Be in breach of any statutory duty that apples to the IPC;
- Be unlawful;
- Result in adverse impacts from the development outweighing the benefits; or
- Be contrary to regulations about how its decisions are to be taken.

4.3.11 To deliver this capacity of solar generation, the equivalent of approximately one project the size of this Scheme would need to be switched on each and every month between the end of 2024 and 2030.

4.3.12 The Scheme would therefore make an important contribution to the delivery of renewable generation technology that is required to decarbonise the energy system and meet the UK's commitments to reduce greenhouse gas emissions and reach net zero carbon emissions by 2050. The Statement of Need **[APP-556]** sets out the need for decarbonisation Section 6, and how the Scheme would contribute to this in detail in Section 9. The Statement of Need **[APP-556]** explains that the Scheme wis capable of delivering large amounts of low carbon electricity to national networks and along with other solar schemes, is of critical importance on the path to net zero. It will also enable all consumers to benefit from the effect of low-marginal cost solar generation on reducing market prices. Furthermore, it explains that maximising the capacity of generation in the proposed area, is to the benefit of all British consumers, and the solar industry generally.

4.3.13 In December 2025, the government updated the energy NPSs which includes EN-1 (Ref.13), EN-3 (Ref.14) and EN-5 (Ref.15) to strengthen the process of delivering major new infrastructure and reinforce its commitment to decarbonisation and deliver Clean Power by 2030 and net zero by 2050. The updated NPSs came into force on 6 January 2026, applying to projects accepted for examination after this date. For projects that have already been accepted for examination, the new NPSs are potentially capable of being important and relevant considerations in the decision-making process.

4.3.14 Sections 2.2 and 2.3 of EN-1 (2023) (Ref.1) sets out that large scale deployment of renewable energy generation is required in order to meet the UK's carbon emissions target and net zero target for 2050 and tackle climate change. At paragraph 2.2.1, it states:

"In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined Contributions (Ref.12) *to reduce GHG emissions by at least 68% from 1990 levels by 2030. In April 2021, the Government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78% by 2035 compared to 1990 levels."*

4.3.15 Parts 2 and 3 of EN-1 (2023) (Ref.1) discuss the need for energy NSIPs. These sections explain the context and drivers for identified energy infrastructure need. The November 2023 NPSs set out principles, which mainly comprise:

1. The need to secure adequate energy supply to accommodate projected increased national energy use.
2. The need to replace the electricity generation capacity that will be decommissioned.
3. The need to reduce greenhouse gas emissions to meet decarbonisation and net zero targets by 2050.
4. The need for more electricity capacity and resilience; and
5. The need to diversify energy supply and reduce reliance on imports of fossil fuels

4.4 The Need to Provide Security of Supply

4.4.1 An increasing demand for electricity and an increasing reliance on generation from renewable sources brings with it new challenges in terms of security of supply, i.e., 'keeping the lights on'.

4.4.2 Section 8 of the Statement of Need **[APP-556]** explains the contribution that the Scheme will make to providing security of supply. Firstly, it will supply a significant capacity of zero-carbon generation that is connected to the NETS, thereby contributing to meeting the overall demand for electricity.

4.4.3 The Statement of Need **[APP-556]** explains that although individual renewable assets are variable generators, the generation dependability of a portfolio which consists of different renewable technologies is more stable. In addition, the generation profiles of a diverse range of low-carbon generators would combine to meet seasonal average demand levels without requiring significant and unproductive capital investment or seasonal excess generation.

4.4.4 The UK benefits from substantial renewable energy resources, including 40% of Europe's wind resource and areas of developable land which receive high levels of solar irradiation. Wind and solar are also mutually compatible technologies as the weather and climatic conditions in which they generate most of their electricity generally occur at different times. Solar farms generate more electricity in the summer months when it is lighter, and days are longer. Wind farms generate more electricity when it is windy, which is more frequent in the winter months.

4.4.5 The government has announced its commitment to deliver Hinkley Point C but in January 2024, it was acknowledged that there have been further construction delays and therefore, it is not scheduled for completion until 2029 at the earliest (detailed in the Statement of Need **[APP-556]).**

4.4.6 The Scheme will deliver significant amounts of low carbon power in a timescale that is short in the context of the delivery of other forms of energy generation infrastructure as solar farm are relatively quick to construct. The Scheme is expected to take approximately 24 months to construct, whereas offshore wind projects take at least 48 months on average to construction and commission each

scheme after achieving planning consent which takes an additional 24 months on average.

4.4.7 In addition, the impacts of a constructed solar arrays and associated infrastructure after decommissioning being relatively simple and straightforward compare with other energy infrastructure, including low carbon schemes, such as offshore wind.

4.4.8 Even allowing for seasonal variations in the demand for electricity, the Statement of Need **[APP-556]** explains that models show that solar generation can efficiently make up the shortfall of required generation capacity from wind in the summer months without delivering significant over-generation in winter periods, as would be the case should wind power seek to make up the seasonal shortfall.

4.4.9 In addition, the Scheme includes an Energy Storage Facility. EN-1 (November 2023) paragraphs 3.3.25 – 3.3.27 recognise the key role that storage has to play in achieving net zero and providing flexibility to the energy system to help reduce electricity costs and increase reliability. The co-location of solar and storage assets helps provide efficiencies in relation to the use of land and available grid connection capability because essential infrastructure can be shared between the two technologies. This is in line with EN-3 (November 2023) paragraphs 2.10.25 and 2.10.26 which states:

"To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs the applicants may choose a site based on nearby available grid export capacity."

"Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure".

4.4.10 The EN-1 (2023) (Ref.1) states in para 3.3.83 that

"*Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy*."

4.4.11 There is also a recognition that in order to meet the ambition energy targets and objectives, there is an urgent need for new electricity network infrastructure to be brought forward at pace. Paragraph 3.3.66 of EN-1 (2023) (Ref.1) states

"The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts."

4.4.12 The national need for solar and energy storage far exceeds the current pipelines for projects of both technologies. The Scheme maximises the existing grid infrastructure and plays an essential role in contributing to the three pillars of energy policy: decarbonisation, security of supply, and affordability. The Scheme's proposed solar generation and energy storage are ideally suited to support the maintenance of a safe, secure and economic electricity system. Further detail on the energy storage element of the Scheme is set out at Section 6.11 and 7.9 of the Statement of Need **[APP-556].**

4.4.13 Paragraphs 3.2.6 to 3.2.8 of EN-1 (2023) (Ref.1) states:

"The Secretary of State should assess all applications for development consent for the types of infrastructure covered by the NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent as described for each of them in this Part.

In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.

The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfy the need established in this NPS"

4.5 The Need for Large Scale Solar to Deliver Low-Cost Energy

4.5.1 The cost of solar generation is already very competitive against the cost of other forms of conventional and low-carbon generation, both in Great Britain and more widely. The Statement of Need **[APP-556]** also identifies at paragraph 10.5.5 that single large-scale solar schemes deliver more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity, bringing forward carbon reduction and economic benefits in line with government policy.

4.5.2 In terms of affordability, internationally and nationally, there is an ongoing trend of solar generation assets becoming bigger and cheaper, with each subsequent project demonstrating that solar generation at the size and scale proposed works in real life. Increased scale and size provide increased decarbonisation benefits and commercial benefits to consumers as set out at Section 10.4 of the Statement of Need **[APP-556].**

4.5.3 In summary, solar generation such as the Scheme can be provided at a large scale for a relatively low cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers.

4.5.4 Paragraph 2.3.3 of EN-1 (2023) (Ref.1) sets out the Government's three objectives of the energy system. These are to:

1. Ensure security and reliability of energy supply.
2. Provide affordable energy to consumers; and
3. Cut greenhouse gas emissions, delivering carbon budgets and achieving net zero by 2050.

4.5.5 Paragraph 2.3.3 of EN-1 (2023) sets out that "this will require a step change in the decarbonisation of our energy system" and paragraphs 2.3.4 to 2.3.5 of EN-1 go on to set out that a significant amount of energy infrastructure, including large-scale projects, will need to be delivered and the volume and proportion of energy supplied from low carbon source will need to be "dramatically" increased. Paragraph 2.3.20 of EN-1 encapsulates the challenges facing the energy system.

> *"Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar."*

4.5.6 Whilst EN-1 (2023) paragraph 3.3.12 acknowledges the role that smaller scale developments play in helping to achieve the Government's objectives and commitments for the energy system, it explains that this alone will not be enough and that "*the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives*." The paragraph goes on to say that large-scale centralised electricity generating facilities have numerous economic and other benefits, including the more efficient bulk transfer of power, which enables surplus generation capacity in one area to be used to cover shortfalls elsewhere.

4.5.7 In summary, EN-1 (2023) sets out that the large delivery of a large amount of renewable generation capacity is required for delivery of the Government's energy objectives and legally binding net zero commitments and that substantial weight should be given to the contribution that proposals would make towards meeting the identified energy infrastructure need.

4.5.8 Paragraphs 4.1.5-4.1.6 of EN-1 (2023) set out that potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts must be taken into account in considered the proposed development. These must be weighed against its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, ecological enhancements and any long-term or wider benefits.

4.5.9 The Planning Statement demonstrates in Section 6 that the Scheme has taken into consideration the potential adverse impacts of the Scheme and where there are adverse impacts, the significant public benefits of the Scheme outweigh these. The Scheme is therefore in accordance with the relevant NPSs and none of the caveats within paragraph 1.1.4 of EN-1 (2023) are relevant in the case of the Scheme. The presumption in favour of granting consent is therefore in place.

4.5.10 From this urgent starting point of a presumption in favour of granting consent for energy NSIPs, paragraph 3.1.2 of EN-1 (2023) go on to acknowledge that "*…it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in parts 4 and 5 of this NPS.*" This statement is in recognition of the fact that it is rarely possible to deliver NSIPs without some significant effects due to their scale. Paragraph 4.1.5 of EN-1

(2023) recognises that significant effects from renewable technologies can potentially affect the environment. Of relevance to the Scheme are potential effects on biodiversity, landscape, heritage and noise which have been assessed in the relevant chapters of the Environmental Statement **[APP-037** to **APP-544]**. In addition, its recognition that a few positive specific effects associated with the technologies may occur, including on biodiversity from solar farms where land is no longer managed intensively. The Biodiversity Net Gain Assessment **[REP1-043]** sets out the significant gains anticipated to result from the Scheme.

4.5.11 Other policies in relation to the delivery of renewable energy, such as paragraph 168 of the NPPF (Ref.17), expect the determination of planning applications to "*not require applicants to demonstrate the overall need for renewable energy or low carbon energy*."

4.5.12 The Scheme will deliver significant carbon savings compared to other types of electricity generation and is expected to have a major beneficial significant effect on the climate. ES Chapter 7: Climate Change **[APP-044]** states that the Scheme is expected to have a total generation figure of between 37.12TWh to 34.35TWh over the estimated 60-year assessed lifetime. Based on the total energy generation of the Scheme and the worst-case assumption for the total lifespan projection of GHG emissions, the intensity of the Scheme is estimated to be between 34.39-37.16gCO_2e/kWh. This compares favourably with fossil fuel generation. Each kilowatt hour of electricity generated by the Scheme will emit significantly less than a gas-fire Combined Cycle Gas Turbine (CCGT), which is 350gCO_2e/kWh. These figures are set out in ES Chapter 7: Climate Change **[APP-044]**.

4.5.13 It is also comparable with other low carbon energy generation. It is considered that the only other viable electricity generation that could be delivered on the land would be for onshore wind which would have a comparable GHG intensity in the range of 7.8-16gCO_2e/kWh. See Table 7.11 – Life cycle CHG Emissions of different electricity sources in ES Chapter 7: Climate Change **[APP-044]**.

4.5.14 ES Chapter 7: Climate Change **[APP-044]** explains that a further calculation has been done to understand at what point the GHG reductions from National Grid through the use of renewable energy at the Scheme would offset the calculated worst-case emissions generated from the products and energy consumption on site. This shows that it is expected that the savings from the Scheme would result in offsetting the construction emissions within the operational phase of the Scheme. Over the 60-year lifespan, there would be a net saving of 186,306 tCO2 from the Scheme, if the panels are tracked or 50,811 tCO2e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used. This will make a significant contribution towards cutting greenhouse gas emissions, delivering carbon budget and achieving net zero by 2050 in line with the objectives set out at paragraph 2.3.3. of EN-1 (2023).

Summary

4.5.15 In summary, the Scheme would:

- **Deliver a large amount of renewable generation capacity** of between 37.12TWh to 34.35TWh over the estimated 60-year assessed lifetime to deliver the government's energy objectives and legally binding net zero commitments in line with the requirements of paragraph 3.3.20 of EN-1 (2023) and the National Infrastructure Strategy 2020.
- **Deliver a reduction of up to 186,306 tCO_2 over the lifetime of the development** compared to if it did not go ahead which would make a significant contribution towards reducing carbon emissions as required by paragraph 2.3.3 of EN-1 (November 2023), the National Infrastructure Strategy (2020) and paragraph 2.3.4 of EN-1 (December 2025).
- **Deliver in a timescale that is short in the context of the delivery of other forms of energy generation** in line with the urgent need to decarbonise expressed in paragraph 2.3.3 of EN-1 (November 2023), the National Infrastructure Strategy (2020) and paragraph 2.3.3 of EN-1 (December 2025).
- **Enable all consumers to benefit from the effect of low-marginal cost solar generation** on reducing market prices, in line with the aim to provide affordable energy for consumers as set out at paragraph 2.3.2, paragraph 2.3.6 and paragraph 3.3.20 of EN-1 (November 2023); and
- **Help ensure security and reliability of energy supply** in line with paragraphs 2.3.4 and 2.3.6 of EN-1 (November 2023).

4.6 Other Benefits of the Scheme

4.6.1 In addition to meeting the urgent national need for secure and affordable low carbon energy infrastructure, the Scheme will deliver other benefits, many of which will be delivered as a result of the Scheme's careful design. These include:

- A significant Net Gain for biodiversity, with 57.01% gains provided in habitat, 13.86% gains in hedgerow and 12.86% gains in river units, in line with local and national planning policies. Post development, the Sites will comprise the following proposed landscaping habitats: enhancement of existing hedgerows and ditches, native hedgerow with trees, native shrub planting, woodland planting, native scattered trees, long term meadow creation (partially panelled), flower rich pollinator mix, tall herb mix, tussock mix, set aside, diverse meadow mix, proposed wildlife ponds, and enhancement of existing ponds. The detailed assessment is set out in the Biodiversity Net Gain Assessment **[REP1-043].**
- A number of new permissive paths for pedestrians will be created within or adjacent to Sites Green Hill A, Green Hill A.2, Green Hill D, Green Hill E, Green Hill F and Green Hill G. In addition, a permissive path for horse riders will be created within Green Hill A, and an existing hacking route for horse riders around 6 fields within Green Hill F will be retained and improved. The design and implementation of the permissive paths is set out in the Landscape and Ecology Mitigation Plans **[EX6/GH6.4.4.10_D, EX6/GH6.4.4.11_C, APP-209, REP3-046, APP-211, EX6/GH6.4.4.14_C, EX6/GH6.4.4.15_C, APP-214, APP-215, REP3-052, REP1-113, REP3-**

054, EX6/GH6.4.4.20_B] and Outline LEMP **[EX6/GH7.4_E]** and secured by a Requirement in the Draft DCO **[EX6/GH3.1_E].**

- The temporary employment generated by the Scheme's construction is assessed to be approximately 464 direct FTE jobs per annum as set out within Section 17.5.2 of ES Chapter 17: Socio Economics, Tourism and Recreation **[APP-054].**
- During its operational lifetime, the Scheme is anticipated to generate a modest quantum of labour, related to ongoing operational management and site management. It is projected that the Scheme will require a gross 15 FTE direct employees per annum as set out within Section 17.5.19 of ES Chapter 17: Socio Economics, Tourism and Recreation **[APP-054].**
- A Skills, Supply Chain and Employment Plan will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally. It will be secured through a requirement included in the DCO for the Scheme. The Outline Skills, Supply Chain and Employment Plan **[APP-552]** forms the basis for this.

4.7 Community Liaison Group

4.7.1 A CLG will be established. This will enable local community representatives to have a formal channel for monitoring and influencing the construction, operational and decommissioning aspects of the Scheme.

4.7.2 The CLG is intended to provide an opportunity for regular and formal dialogue between the Applicant and the local community's representatives in relation to the construction and operational aspects of the Scheme. It is envisaged that local community representatives forming the CLG will be principally from the villages and communities neighbouring the Order Limits.

4.7.3 CLG meetings will enable members of the group to raise and formally record any issues that may arise in relation to the Scheme. It will also provide a regular forum for the Applicant to update interested parties about the construction and operation of the Scheme. The details of the CLG will be set out in the Construction Environmental Management Plan and are outlined within the Outline Construction Environmental Management Plan **[EX6/GH7.1_C]**. The delivery of the CLG will be secured via a Requirement of the DCO.

4.8 Community Fund

4.8.1 The Applicant has also committed to providing a Community Benefit Fund (CBF). The CBF does not form part of the DCO application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, the SoS cannot, and must not, apply any positive weight to the CBF when balancing the positives and negatives of the Scheme. The CBF is therefore not taken into account in consideration of the planning balance within this Planning Statement. It will, however, be available to fund local community projects.

5 Legislative and Policy Context

5.1 Introduction

5.1.1 This section outlines the legislative framework and the planning policy context for the Scheme. Section 5.2 sets out the relationship of the Scheme with the PA 2008 (Ref.5). Sections 5.3 and 5.4 introduce national and local planning policy and other documents that the Applicant expects to be important and relevant to the decision and that are considered in this Planning Statement. Section 5.5 introduces other national policy documents which the SoS may consider to be important and relevant to their decision.

5.2 Legislative Context

5.2.1 The PA 2008 (Ref.5) provides the legislative basis and defines the application process under which consent for a NSIP is sought. The PA 2008 sets out that projects meeting certain defined criteria are classified as NSIPs. It requires developers of NSIPs to obtain a DCO to permit the construction, operation and maintenance of their project.

5.2.2 The Scheme is defined as an NSIP under Sections 14(1)(a), 15(1) and 15(2) of the PA 2008 by virtue of the facts listed below:

- The Scheme comprises the construction of a generating station (Section 14(1)(a) of the PA 2008);
- It would be located in England (Section 15(2)(a) of the PA 2008);
- It would not generate electricity from wind (Section 15(2)(aa) of the PA 2008);
- It would not be an offshore generating station (Section 15(2)(b) of the PA 2008); and
- Its capacity would be more than 50 MW (Section 15(2)(c) of the PA 2008).

5.2.3 The Secretary of State (SoS) is the decision-maker for applications for DCOs under Section 103 of PA 2008.

5.2.4 Where a relevant National Policy Statements (NPS) has been designated, the decision-maker must follow Section 104 of PA 2008 (Ref.5). As stated in paragraph 1.3.5 above, three relevant NPSs were designated in January 2024: NPS EN-1, NPS EN-3, and NPS EN-5. These NPSs were also updated in December 2025 and designated in January 2026 to align with the latest government policy and objectives on the need to decarbonise through the use of renewable energy which needs to be significantly increased in all sectors such as wind and solar. In accordance with section 1.6 of NPS EN-1 (December 2025), the 2024 suite of NPSs will continue to apply to projects accepted for examination before January 2026.

5.2.5 Under Paragraph 104(2) of PA 2008 (Ref.5), in making their decision, the SoS 'must have regard to':

- any relevant national policy statement;

- any local impact report (LIR) from affected local authorities (Host Authorities);
- 'any matters prescribed in relation to development of the description to which the application relates';
- any other matters which the SoS thinks are both important and relevant.

5.2.6 The SoS 'must' decide the application in accordance with any relevant national policy statement, with a number of exceptions set out in Paragraphs 104(5) to 104(8):

- deciding the application in accordance with any relevant national policy statement would lead to a breach of international obligations;
- deciding the application in accordance with any relevant national policy statement would lead to the SoS being in breach of any duty imposed by or under any enactment;
- deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment;
- the adverse impact of the proposed development would outweigh its benefits;
- 'any condition prescribed for deciding an application otherwise than in accordance with a national policy statement is met'.

5.2.7 The prescribed conditions referred to in Section 105(8) of the PA 2008 (Ref.5) are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (the Decisions Regulations). The Regulations that are of relevance to the Scheme are:

- Regulation 3 - Having regard to the desirability of preserving listed buildings and scheduled monuments and their settings as well as preserving or enhancing the character or appearance of conservation areas where the development would affect these; and
- Regulation 7 - Having regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992.

5.2.8 Section 115 of the PA 2008 (Ref.5) provides that development consent may be granted for *"development for which development consent is required"* or for *"associated development".* In the case of the Scheme the development which constitutes *"development for which development consent is required"* is described as Work No.1 in Schedule 1 of the Draft DCO **[EX6/GH3.1_E]**. This constitutes the NSIP for which development consent is required, being a ground mounted solar photovoltaic generating station with a gross electrical output capacity of over 50 megawatts,

5.2.9 Works Nos. 2 to 10, including Work No. 2 (Energy Storage Facility), are associated development. Further details as to why the Applicant considers that Work Nos. 2 to 10 constitute associated development are set out in the Draft Explanatory Memorandum **[CR1-016]**.

The Environment Act 2021

5.2.10 The Environment Act 2021 gained Royal Assent on 9 November 2020 and came into force on 7 April 2025 (Ref.18). It provides targets, plans and policies for improving the natural environment. These include:

- Establishing the Office for Environmental Protection, which states that its purpose is to protect and improve the environment by holding government and public authorities to account.
- Increase local powers to tackle sources of air pollution.
- Protect nature and improve biodiversity, including a requirement for 10% biodiversity net gain for developments consented under the Town and Country Planning Act 1990 and the Planning Act 2008 (Ref.5).On 21 February 2023, the Government published a response to the consultation on biodiversity net gain (BNG) regulations and implementation where it was confirmed that the Government will keep its current position, with the requirement to be in place no later than November 2025.
- Extend producer responsibility, ensure a consistent approach to recycling, introduce deposit return schemes, and introduce charges for specified single use plastic items.
- Secure long-term, resilient water and wastewater services, including through powers to direct water companies to work together to meet current and future demand.

5.3 National Planning Policy

5.3.1 This section sets out the national planning policy documents that are considered in this Planning Statement. These comprise the Energy NPSs and the National Planning Policy Framework (Ref.17).

Energy National Policy Statements

5.3.2 National Policy Statements (NPSs) set out the policy basis for determining DCO applications. These are sector specific, covering: energy; transport; and water, wastewater and waste. There are six Energy NPSs, each covering one of the following matters: overarching energy policy; fossil fuels; renewable energy; oil and gas supply and storage; electricity networks; and nuclear power.

5.3.3 NPSs for Energy were published in November 2023 and were designated on 17 January 2024 in accordance with the PA 2008 (Ref.5). They are applicable to all new DCO applications for energy NSIPs under S104 of the PA 2008 (Ref.5) from early 2024.

5.3.4 Three of the NPSs are relevant to this DCO application:

- Overarching National Policy Statement for energy (EN-1) (Ref.1);
- National Policy Statement for renewable energy infrastructure (EN-3) (Ref.2), which includes specific policies for solar photovoltaic generation NSIPs; and

- National Policy Statement for electricity networks infrastructure (EN-5) (Ref.3).

5.3.5 EN-1, EN-3, and EN-5 (2023) provide the primary policy basis for deciding the DCO Application. EN-1 provides the overarching policy position and solar PV generation falls within the EN-1 definition of critical national priority (CNP) infrastructure. EN-3 outlines the SoS's decision making for solar PV generation considerations.

5.3.6 The Energy NPSs reflect the Government's current strategy and energy policies. They provide the planning policies that are needed to facilitate the delivery of the energy infrastructure that is required for the Government's objectives for the energy system to be met. There is a presumption under the NPSs that the urgent need for CNP infrastructure will outweigh any residual effects in all but the most exceptional cases (section 3.3.63 of EN-1 (2023)). This presumption does not apply to residual impacts that present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats, or unacceptable risk to achieving net zero (section 4.1.7 of EN-1 (2023)). Where no such residual impacts exist, the presumption weighs in favour of the need for CNP infrastructure where it has been demonstrated that the mitigation hierarchy has been applied (section 4.2.11 of EN-1 (2023)).

5.3.7 The separate Policy Compliance Document **[REP4-014]** provides detailed evidence of compliance with relevant national and local policy documents and should be read in conjunction with this section.

Overarching National Policy Statement for Energy (EN-1) (2023) (Ref.1)

5.3.8 EN-1 (2023) sets out the national policy for the delivery of energy infrastructure, including solar renewable electricity generation.

5.3.9 Part 3 of EN-1 paragraph 3.1.1 explains that the UK Government sees a need for significant amounts of new large scale energy infrastructure to meet its energy objectives and why the UK Government considers that the need for such infrastructure is urgent.

5.3.10 The Overarching NPS for Energy EN-1 goes on to stress, through paragraph 4.2.4, that *"there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*." Low carbon infrastructure includes solar electricity generation that does not involve fossil fuel combustion.

5.3.11 Part 3.3 of EN-1 identifies the need for nationally significant energy infrastructure to address energy security objectives and carbon reduction requirements, replace closing generating capacity, and support an increase in renewables supply. The assessment principles (part 4) and generic impacts (part 5) provide a framework of considerations across energy technologies.

National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023) (Ref.2)

5.3.12 EN-3 (2023) together with EN-1, provides the primary basis for decisions on renewable energy NSIPs.

5.3.13 The importance of the generation of electricity from renewable sources is stated in Paragraph 1.1.2 of EN-3:

> *"Electricity generation from renewable sources of energy is an essential element of the transition to net zero and meeting out statutory targets for the sixth carbon budget (CB6). Our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050".*

5.3.14 EN-3 provides a framework for assessment and technology-specific information for specified renewable energy technologies. Solar PV is included in EN-3 under section 2.10, which includes relevant information on the technology to inform assessment and decision-making.

National Policy Statement for Electricity Networks Infrastructure (EN-5) (2023) (Ref.3)

5.3.15 The NPS for Electricity Networks Infrastructure (EN-5) is the primary basis for decisions on transmission and distribution system NSIPs and associated infrastructure. EN-5's relevance to the Scheme is limited to the grid connection. EN-1 paragraph 4.11.4 on grid connection refers to EN-5 for further guidance on relevant considerations, including the impact of electromagnetic fields (EMFs).

Updated Energy National Policy Statements (December 2025)

5.3.16 In December 2025, Government published updated versions of EN-1, EN-3 and EN-5 (Ref.13, Ref.14, Ref.15) and these were designated in January 2026. The principal change relevant to this application is the addition of reference to the Clean Power 2030 Action Plan (Ref.4). As the updated document states, 'the policy narrative through EN-1 has been updated to bring Clean Power 2030 front and centre as the primary policy that the NPSs enable'.

5.3.17 The updated NPS EN-1 (2025) at paragraph 3.2.5 states that "*the government's strategic framework includes the Clean Power 2030 Action Plan and the pathways to 2030, the Strategic Spatial Energy Plan, and the Centralised Strategic Network Plan*" (Ref.13).

5.3.18 In addition, inclusion of types of infrastructure within Clean Power 2030 (Ref.4) is incorporated into the definition of CNP, with paragraph 4.2.16 of the updated NPS EN-1 (2025) explaining that "*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero*".

National Planning Policy Framework (NPPF)

5.3.19 This Planning Statement considers the conformity of the Scheme with the NPPF (Ref.17) to the extent that it is likely to be important and relevant in the SoS's decision.

5.3.20 The NPPF was last updated February 2025 and sets out the Government's planning policies for England. It was written to guide the development of local planning policy documents and is a material consideration in the determination of planning applications under the Town and Country Planning Act 1990 (TCPA 1990). As such, its policies were designed with development that is of a scale so

as to be of local or regional significance in mind. Paragraph 5 of the NPPF confirms that it does not contain specific policies for NSIPs but that the NPPF may be a relevant matter in decision making. Whilst not specifically addressing NSIPs, the NPPF does set out its objectives to achieve sustainable development by pursuing economic, social and environmental objectives in development.

5.3.21 Paragraphs 4.1.12 to 4.1.15 of EN-1 (2023) (Ref.1) confirm that the SoS may consider development plan documents both important and relevant to their decision-making. This notwithstanding, EN-1 (2023) confirms that the NPSs constitute the primary policy documents and would take precedence in the event of a conflict between the NPSs and other matters, given the national significance of the infrastructure.

National Infrastructure Planning Guidance

5.3.22 There are a range of guidance documents published by Government that relate to the Planning Act 2008 (Ref.5) process. Those considered of most relevance to the Scheme include:

- National Infrastructure Commission's (NICs) National Infrastructure Assessment 1 (2018) (Ref.19)
- Planning Act 2008: Content of a Development Consent Orders required for Nationally Significant Infrastructure Projects (April 2024) (Ref.20)
- Planning Act 2008: Pre-application process for Nationally Significant Infrastructure Projects (April 2024) (Ref.21)
- Planning Act 2008: Pre-examination stage for Nationally Significant Infrastructure Projects (April 2024) (Ref.22)
- Planning Act 2008: Examination of applications for Nationally Significant Infrastructure Projects (April 2024) (Ref.23)
- Planning Act 2008: guidance relating to procedures for the compulsory acquisition of land (April 2024) (Ref.24)
- Planning Act 2008: associated development applications for major infrastructure projects (April 2013) (Ref.25)
- Planning Act 2008: application form guidance (April 2013). (Ref.26)
- Powering Up Britain (April 2023) (Ref.27)
- National Infrastructure Commission's (NICs) 'Design Principles for National Infrastructure' report (Ref.28)

Planning Practice Guidance (PPG)

5.3.23 The Planning Practice Guidance supports the policies set out within the NPPF (Ref.17) discussed above. The guidance covers a range of topics including climate change, renewable and low carbon energy, environmental impact assessment, flood risk, historic environment, light pollution, minerals, natural environment, noise, transport and waste.

5.4 Local Planning Policy

5.4.1 This Planning Statement considers the conformity of the Scheme with the following Development Plan Documents (DPDs) to the extent that they are likely to be important and relevant in the SoS's decision.

5.4.2 Host Authority Planning Policies are drawn from the following documents:

- North Northamptonshire Joint Core Strategy 2011-2031 (NNJCS) (Adopted July 2016) (Ref.29);
- Wellingborough Local Plan Part 2 (WLP) (Adopted February 2019) (Ref.30);
- West Northamptonshire Joint Core Strategy Local Plan (Part 1) (WNJCS) (Adopted December 2014) (Ref.31);
- Daventry Local Plan 2011-2029 Part 2 (DLP) (Adopted February 2020) (Ref.32);
- South Northamptonshire Local Plan Part 2 (SNLP) (Adopted July 2020) (Ref.33)
- Northamptonshire Minerals and Waste Local Plan (NMWLP) (Adopted July 2017) (Ref.34);
- Milton Keynes Plan:MK 2016 to 2031 (MKLP) (Adopted March 2019) (Ref.35);
- Milton Keynes Minerals Local Plan (MKMLP) (Adopted July 2017) (Ref.36);
- Milton Keynes Waste Development Plan Document 2007-2026 (MKWDP) (Adopted February 2008) (Ref.37);
- Emerging North Northamptonshire Local Plan (ENNLP) (Regulation 18 Issues and Scope Consultation version published March 2022) (Ref.38);
- Emerging West Northamptonshire Local Plan (EWNLP) (Regulation 18 version published January 2026) (Ref.39); and
- Emerging MK City Plan 2050 (EMKLP) (Regulation 19 version published November 2025) (Ref.40).

5.4.3 Local Development Plans within 2 km of the Order Limits comprise:

- Kettering Site Specific Part 2 Local Plan (Adopted December 2021) (Ref.41)
- Bedford Borough Local Plan 2030 (BBLP) (Adopted January 2020) (Ref.42);
- Bedford Borough Allocations and Designations Local Plan (BBADLP) (Adopted July 2013) (Ref.43);
- Bedfordshire and Luton Minerals and Waste Local Plan (BLMWLP) (Adopted January 2014) (Ref.44); and
- Submission Draft Bedford Local Plan (DBBLP) (Published April 2022) (Ref.45).

5.4.4 Neighbourhood Plans covering part of the Order Limits comprise:

- North Northamptonshire: Earls Barton Neighbourhood Plan (Made January 2016) (Ref.46); and
- Milton Keynes: Lavendon Neighbourhood Plan (Made March 2020) (Ref.47)

5.4.5 Neighbourhood Plans within 2 km of the Order Limits comprise:

- North Northamptonshire: Ecton Neighbourhood Development Plan (Made June 2021) (Ref.48);
- West Northamptonshire: Moulton Neighbourhood Plan (Made December 2016)(Ref.49);
- West Northamptonshire: Overstone Neighbourhood Plan (Made December 2021) (Ref.50); and
- Bedford Borough: Harrold Neighbourhood Development Plan (Made January 2022) (Ref.51).

5.4.6 The Policy Compliance Document **[REP4-014]** sets out the relevant adopted and draft local planning policies in full and sets out the accordance of the Scheme against the policies.

5.4.7 The Applicant is not presenting a full appraisal of the EWNLP (Regulation 18 version published January 2026) or the previous April 2024 Regulation 18 version in this Planning Statement or the Policy Compliance Document **[REP4-014]** as it does not consider there are any policies which present a material difference in policy from those already considered as part of the adopted development plan of West Northamptonshire.

5.4.8 As with the NPPF, DPDs are prepared to guide decision making on planning applications submitted to Local Planning Authorities, rather than DCO applications for energy NSIPs which are to be decided by the SoS. DPDs and other local policies may be important and relevant to the SoS's decisions, particularly where the document contains a policy that identifies an allocated site, a safeguarded land use, or an environmental designation that may affect the assessment of the likely impact of the Scheme.

5.5 Supplementary Planning Documents and Other Local Strategies

5.5.1 Other relevant Supplementary Planning Documents and strategies are as follows:

- Northamptonshire Transportation Plan (March 2012) (Ref.52);
- Local Transport Plan 3 for Milton Keynes (LTP3) (April 2011) (Ref.53);
- Bedford Borough Local Transport Plan 2011 to 2021 (Ref.54);
- Biodiversity Supplementary Planning Document for Daventry District (May 2017) (Ref.55);
- Daventry and South Northamptonshire Energy and Development Supplementary Planning Document (March 2007) (Ref.56);

- South Northamptonshire Energy Efficiency & Renewable Energy SPD (July 2013) (Ref.57);
- Milton Keynes Drainage Strategy SPD (2004) (Ref.58);
- Milton Keynes Biodiversity SPD (2021) (Ref.59);
- Milton Keynes Sustainable Construction SPD (2021) (Ref.60);
- Milton Keynes Council Plan 2022-2026 (Ref.61);
- Milton Keynes Strategy for 2050 (refreshed January 2025) (Ref.62);
- Milton Keynes Sustainability Strategy (January 2019) (Ref.63);
- North Northamptonshire Climate Change Strategy (February 2025) (Ref.64);
- West Northamptonshire Climate Change Strategy (Ref.65);
- West Northamptonshire Environmental Policy (March 2024) (Ref.66);
- West Northamptonshire Sustainability Report (November 2024) (Ref.67);
- North Northamptonshire Electric Vehicle Infrastructure Strategy 2024-2030 (July 2024) (Ref.68); and
- North Northamptonshire Mears Ashby Village Design Statement (February 2017) (Ref.78).

5.6 Other Policy and Legislation

5.6.1 This section sets out legislation and policy, other than planning legislation and policy, that the Applicant considers is likely to be important and relevant to the SoS's decision.

Climate Change Act 2008

5.6.2 The Government, through the Climate Change Act 2008 (CCA2008) (Ref.9), made the United Kingdom the first country in the world to set legally binding carbon budgets, aiming to cut emissions (versus 1990 baselines) by 34% by 2020 and at least 80% by 2050, *"through investment in energy efficiency and clean energy technologies such as renewables, nuclear and carbon capture and storage"* (Ref.9).

5.6.3 CCA2008 is underpinned by further legislation and policy measures. Many of these have been consolidated in the UK Low Carbon Transition Plan (2009) (Ref.69), and UK Clean Growth Strategy (2017) (Ref.70).

The Climate Change Act 2008 (2050 Target Amendment) Order 2019

5.6.4 In June 2019, legislation was passed to amend the Climate Change Act (Ref.9) to set a new ambitious target requiring the UK to bring all greenhouse gas emissions to net zero (i.e. 100% reduction by 2050, compared with the previous target of at least 80% reduction from 1990 levels.

National Infrastructure Strategy (2020)

5.6.5 The National Infrastructure Strategy (NIS) (Ref.71) published in November 2020 sets out plans to transform the UK's infrastructure. The Strategy is the Government's response to recommendations made by the National Infrastructure Commission (NIC), which was set up to provide impartial, expert advice to the Government on long-term infrastructure priorities. In July 2018, the NIC published the National Infrastructure Assessment (Ref.19) which provided the foundation for many of the measures included within the NIS.

5.6.6 One of the aims of the NIS is to achieve net zero carbon emissions by 2050. The Government acknowledges in the NIS that to deliver net zero, the share of generation from renewables needs to dramatically increase. It identifies that this can be achieved by the provision of greater generation capacity from onshore wind and solar. As recommended by the NIC, the NIS sets out plans to include solar PV in the next auction round (2022) for Contracts for Difference (CfD), which is the Government's main mechanism for supporting low-carbon electricity generation. This incentivises investment in renewable energy by providing developers of projects with high upfront costs and long lifetimes with direct protection from volatile wholesale prices, and they protect consumers from paying increased support costs when electricity prices are high.

5.6.7 The NIS demonstrates the Government's commitment, including a financial commitment, to supporting solar generation now.

Environment Act 2021

5.6.8 The Environment Act 2021 (Ref.18) makes provisions about targets, plans and policies for improving the natural environment. Schedule 15 of the Environment Act 2021 explains biodiversity net gain in nationally significant infrastructure projects. Although these provisions are not yet in force, it is expected that they will come into force in 2025 at which point they will lead to an imposition of a requirement for the "*biodiversity value attributable to the development [to] exceed the pre-development biodiversity value of the on-site habitat by at least 10%".*

Powering up Britain (March 2023)

5.6.9 Powering up Britain (Ref.27) sets out the Government's plan to enhance the UK's energy security, seize economic opportunities in the transition and deliver on net zero commitments. The paper is focused on the transition between UK oil and gas to renewable energy sources. In order to meet its goal of quintupling its solar power by 2035, the paper states, regarding large-scale solar development. "*Government seeks large scale solar deployment across the UK, looking for development mainly on brownfield, industrial and low/medium grade agricultural land. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment*".

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

5.6.10 The 25 Year Environment Plan published in 2018 (Ref.75) sets out the Government's 25-year plan to improve the environment within a generation.

5.6.11 It sets out 10 goals which include the achievement of: clean air; clean and plentiful water; thriving plants and wildlife; reduced risk of harm from environmental hazards like flooding and drought; the more sustainable and efficient use of resources from nature; enhanced beauty, heritage and engagement with the natural environment; mitigation and adaption to climate change; minimisation of waste; management of exposure to chemicals; and enhanced biosecurity.

5.6.12 Six key areas of policy are set out in the plan and include:

- Using and managing land sustainably (including embedding an 'environmental net gain' principle for developing and measuring natural capital and reducing flood risk).
- Recovering nature and enhancing the beauty of landscapes (including developing a Nature Recovery Network and reviewing National Parks and AONBs).
- Connecting people (including children) with the environment to improve health and wellbeing (including encouraging children to be close to nature, both in and out of school and greening out cities).
- Increasing resource efficiency and reducing pollution and waste (including achieving zero avoidable plastic waste by end of 2042).
- Securing clean, productive and biologically diverse seas and oceans (including a post-Brexit new sustainable fisheries policy).
- Protecting and improving the global environment (including providing 'international leadership and leading by example' and 'leaving a lighter footprint on the global environment).

5.6.13 This plan highlights the Government's support for the reduction in the UK's carbon footprint; protection and enhancement of the natural environment; and ensuring land is managed with environmental gains which is of relevance to the Scheme.

British Energy Security Strategy (2022)

5.6.14 The British Energy Security Strategy (Ref.76) sets out the immediate need to manage the financial implications of soaring commodity prices in the near term on households and businesses which are already feeling economic pain as the post-Covid cost of living has risen*: "The first step is to improve energy efficiency, reducing the amount of energy that households and businesses need."*

5.6.15 In the near-term, the strategy sets out a high-level action plan to upgrade the energy efficiency of at least 700,000 homes in the UK by 2025, and to ensure that by 2050 all UK buildings will be energy efficient with low-carbon heating. Further, the strategy sets out an intent to phase out the sale of new and replacement gas boilers by 2035.

5.6.16 The Strategy aims to:

- Cut planning consent process time by over half through, among other measures, strengthening the Renewable National Policy Statements (EN-3) (2023) (Ref.2) to reflect the importance of energy security and net zero;

- Increase the pace of deployment of Offshore Wind by 25% to deliver up to 50 GW by 2030, including up to 5 GW of innovative floating wind. Wind will contribute over half the UK's renewable generation capacity by 2030;
- Consider all options including Onshore Wind through the improvement of national electricity network infrastructure and support of a number of new English projects with strong local backing, so prioritising "putting local communities in control" of local onshore solutions. Repowering of existing onshore wind sites is also under consideration. (Ref.76, p18);
- Support a 5-fold increase in deployment of solar technology by 2035, recognising the abundant source of solar energy in the UK and an 85% reduction in cost over the last ten years of solar power. For ground-mounted solar, the strategy indicates a future consultation on planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place. (Ref.76, p19);
- Increase UK plans for deployment of civil nuclear to up to 24 GW by 2050 – three times more than operational capacity in 2022 and representing up to 25% of our projected electricity demand. This includes the intention to take one project (Sizewell C) to FID during the current Parliament, and two projects to FID in the next Parliament, including Small Modular Reactors, subject to value for money and relevant approvals. (Ref.76, p21). The selection process for further UK projects is anticipated to be initiated in 2023 (Ref.76, p22); and
- Double the UK ambition for hydrogen production to up to 10 GW by 2030, with at least half of this from electrolytic hydrogen (Ref.76, p22), facilitated by bringing forwards up to 1 GW of electrolytic hydrogen into construction or operational status by 2025.

Clean Power 2030 Action Plan (December 2024)

5.6.17 The Clean Power 2030 Action Plan (Ref.4) sets out a pathway to a clean power system by 2030. The action plan will herald a new era of clean energy independence and tackle three major challenges: the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change.

The Land Use Framework for England

5.6.18 The Land Use Framework for England (Ref.79) was presented to Parliament in March 2026. The purpose of the framework is to set out the effective use of land. It includes a vision for England's future landscape, sets out a new set of principles to inform how decisions are made about land and includes actions that the Government will take to support land change use, in combination with other stakeholders.

5.6.19 The Framework recognises the importance of building a renewable energy system. Regarding the development of solar farms, it states that the change of use from agriculture to solar farms is small in percentage terms, taken at a national level. It adds that there are opportunities to continue farming alongside solar generation, including through continued livestock grazing and agrivoltaics.

5.6.20 The Framework supports the Government's Clean Power 2030 Action Plan and its ambitions for 95% of electricity to come from clean power sources by 2030. It sets out how solar farms can be delivered sustainably though projects such as rewetting lowland peat soils beneath the solar panels. This leads to multifunctionality, delivering greater benefits for a number of uses on the same land.

6 Planning Appraisal

6.1 Introduction

6.1.1 This section presents an appraisal of the Scheme's compliance with the main policy requirements that are applicable to it. These requirements emerged from a review of policy documents set out in Section 5 of this Planning Statement. In addition, the **Policy Compliance Document [REP4-014]** sets out an analysis of the Scheme's compliance with national and local policies, respectively. The issues covered in this section are as follows:

- Alternative sites and site selection (section 6.2)
- Good design (section 6.3)
- Climate change (section 6.4)
- Landscape and visual impact (section 6.5)
- Ecology and biodiversity (section 6.6)
- Hydrology, flood risk and drainage (section 6.7)
- Mineral safeguarding (section 6.8)
- Cultural heritage (section 6.9)
- Transport and access (Section 6.10)
- Noise and vibration (Section 6.11)
- Glint and glare (Section 6.12)
- Air quality (Section 6.13)
- Socio-economics, tourism and recreation (section 6.14)
- Effects on human health (section 6.15)
- Arboriculture (section 6.16)
- Agriculture (section 6.17)
- Electromagnetic fields (section 6.18)
- Ground conditions (section 6.19)
- Major accidents and disasters (section 6.20)
- Waste (section 6.21)
- Cumulative and In-combination (section 6.22)

6.1.2 Sections 6.3 to 6.23 take account of potential effects from the construction, operation and decommissioning phases of the Scheme. They also take account of the fact that the Scheme will be decommissioned at the end of its operational life.

6.2 Alternative Sites and Site Selection

6.2.1 National Policy Statement (NPS) EN-1 (2023) (Ref.1) Paragraph 4.3.9 states that "*as in any planning case, the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to a Scheme is, in the first instance, a matter of law.*" The 2023 NPS confirms that there is no "general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective".

6.2.2 Paragraph 4.3.15 states: "*Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility*".

6.2.3 Paragraph 4.3.23 states: "*The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.*"

6.2.4 Paragraph 4.3.24 states: "*The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.*"

6.2.5 Paragraph 4.3.26 states: "*if the Secretary of State concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the Secretary of State's decision*"

6.2.6 Section 2.3 of EN-3 (2023) (Ref.2) sets out the factors influencing site selection and design, and Section 2.10, at paragraphs 2.10.18 – 2.10.69 sets out the factors that are likely to influence the key considerations involved in the siting of a solar farm. These include irradiance and site topography, availability of grid connection, proximity of a site to dwellings, agriculture land classification and land type, accessibility, and capacity of a site. EN-5 (2023) (Ref.3) includes the following relevant policies on alternatives at paragraphs 2.2.7 – 2.2.9:

> *"The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints such as engineering, environmental, or community considerations will be important in determining a feasible route.*
>
> *There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.*
>
> *In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts."*

6.2.7 Chapter 5 Alternatives and Design Evolution **[APP-042]** of the ES, sets out the site selection process and the consideration of alternative sites. This also includes a no development scenario.

6.2.8 In terms of the site selection process, there is no standard methodology for this for solar energy schemes. However, it is acknowledged by EN-3 (2023) (Ref.2) that a viable grid connection is a material consideration for progressing with a solar development and is crucial to defining the search area. The site selection process has been carried out following a five stage site selection process that has sought to identify sites that meet the legislative and policy requirements. A detailed site selection assessment has been completed and supports this Application **[REP1-037].** The site selection process and confirmation of the site suitability when considered against potential alternative sites is summarised in the following sections.

Stage 1 is the identification of the search area.

6.2.9 The Applicant was notified of grid capacity at Grendon Substation during discussions with National Grid in 2022. Due to the immediate availability of this Point of Connection (PoC), and in line with the recognition in EN-1 (2023) (Ref.1) that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals, the Applicant did not consider any further alternative grid connection points for this Scheme. Having identified available grid connection capacity at National Grid Grendon Substation, the Applicant assessed all available sites close to the PoC, including brownfield land, at the site selection stage through reference to the local planning authorities brownfield land registers.

6.2.10 The Applicant sought to find a total site which is around 10% larger than is needed for the grid connection offer. Based on Island Green Power's experience of developing utility scale solar projects, a larger site size provides flexibility for the accommodation of additional mitigation measures and other constraints that may become known through the design development process.

6.2.11 An initial search area was identified at a 5km radius from the Grendon Substation. The search area was then enlarged incrementally, with the clear preference of identifying land as close to the Grendon Substation as practicable, until sufficient options for the land required for the Scheme were identified with willing landowners within a 20km radius. This is considered by the Applicant to be a viable cable connection distance for a solar farm of this scale. The search area is shown on Figure 5.1 **[APP-222].**

6.2.12 However, given that the distance from the PoC has an impact on the transmission of electricity to the grid in terms of being less efficient and the connection becomes most costly over longer distances. For these reasons, 20km was the furthest that the Applicant considered to locate the Scheme from the PoC.

Stage 2 scope the planning, environmental and spatial constraints.

6.2.13 This involved mapping of planning, environmental and spatial constraints within the search area which have been identified through a review of relevant national planning policies.

6.2.14 As set out above, EN-3 (2023) (Ref.2) states that previously developed land, brownfield land, contaminated land and industrial land should be preferred for solar projects. Where use of agricultural land is necessary, poorer quality land should be preferred, avoiding the use of best and most versatile land where possible.

6.2.15 The majority of the land for site and Scheme is agricultural and the Applicant has sought to exclude land that is identified as being within an agricultural land classification category that is, or includes, best and most versatile land: ALC grades 1, 2 and 3. Therefore, at Stage 2 all land in Grades 1, 2 and 3 was excluded and the Applicant attempted to identify suitable sites within areas of Grade 4, 5 or unclassified land that was not affected by the other identified planning and environmental constraints

6.2.16 Detailed Agricultural Land Classification surveys (ALC) have been undertaken to identify the grade of land within the Sites are reported in ES Chapter 20: Agricultural Circumstances **[APP-057]** and associated Appendix 20.1 (Agricultural Land Classification Technical Report) **[APP-172]**.

6.2.17 The ALC Technical Report includes baseline information for the Cable Route Corridor, based on desk study information. This is because the development proposed is a buried cable, with the interruption of the existing agricultural use limited to the brief cable laying operation. An Outline Soil Management Plan **[EX6/GH7.6_A]** has been developed alongside the Outline Construction Environment Management Plan **[EX6/GH7.1_C]** to protect agricultural land and soil resources. This includes soil mitigation measures for soil handling during the construction, operation and decommissioning. The key soil mitigation measures include preconstruction planning; site preparation; soil stripping, storage and maintenance; soil reinstatement; and soil aftercare.

6.2.18 ES Chapter 20: Agricultural Circumstances **[APP-057]** identifies that there is Grade 1 (14.2 ha, 1%), Grade 2 (313.6 ha, 25%), Grade 3a (526.7 ha, 43%), and Grade 3b (444.2 ha, 36%) and Grade 4 (25.9 ha, 15.6%) land within the Sites and Cable Route Corridor. In accordance with criteria set out in ES Chapter 20, Table 20.2, the sensitivity of Grade 1 and 2 land is classified as Very High, Grade 3a as High, and Grade 3b as Medium and Grade 4 as Low. As the majority of the Sites and Cable Route Corridor will be returned to their original use and condition as far as practicable after construction and decommissioning, in accordance with criteria in Table 20.6 of ES Chapter 20, the magnitude of impact on agricultural land would be Minor.

6.2.19 The Outline Soil Management Plan **[EX6/GH7.6_A]** specifically identifies the impacts of the Scheme upon soils and identifies suitable mitigation measures and management regimes to minimise that impact including after care management and decommissioning.

6.2.20 The biodiversity and nature conservation impacts of the Scheme are considered in ES Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]**. The ES concludes that with mitigation, the Scheme is expected to have an overall significant beneficial impact as a result of measures being applied to key receptors. In addition, the submitted Outline Construction Environmental Management Plan

(OCEMP) **[EX6/GH7.1_C]** and Outline Decommissioning Statement (ODS) **[EX6/GH7.3_C]** include specific measures to manage and avoid any potential further impact on the local areas of biodiversity and ecological importance from accidental damage and other indirect effects during construction or decommissioning. The Outline Ecological Protection and Mitigation Strategy (OEPMS) **[EX6/GH7.5_D]** also includes mitigation measures including precautionary principles approach to removal works to minimise the effects of the construction and operational phases of the Scheme.

Stage 3 identify the potential areas for development.

6.2.21 Given the scale of the proposed Scheme, an available single site of 1,100ha within sufficient distance to the Grendon Substation was not identified. Therefore, the Applicant considered smaller parcels of land that could be linked, with sites of at least 40ha of contiguous land required.

6.2.22 The use of previously developed (brownfield) land and commercial roof-tops has been considered. There was no brownfield land that meets the minimum individual site size threshold nor the area of approximately 1,100 ha required for a network of sites in proximity for the Scheme, identified within the 20km search area from the Grendon Substation PoC.

6.2.23 No commercial rooftops or combined premises of an adequate area to facilitate a large-scale solar project or provide a viable network of sites in proximity were identified. EN-3 (2023) (Ref.2) reiterates there is a requirement for both ground and roof mounted solar, suggesting that solar generation is expected to make achieving net zero targets and the energy security goals set out in the British Energy Security Strategy, of "*a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW)*".

6.2.24 Aside from the current site, two alternative suitable potential development areas (PDAs) were also identified at Higham Ferrers to Bedford and Yardley Hastings to Olney.

6.2.25 Stage 4 is to evaluate the two PDAs for solar, which have been identified as part of Stage 3. Following an assessment of the two PDAs, it was determined that they were unsuitable due to a combination of constraints including the presence of ancient woodland and other sensitive factors as outlined in Annex E of ES Appendix 5.1 Site Selection Assessment **[REP1-037].**

6.2.26 Finally, Stage 5 is to consider Best and Most Versatile (BMV) Agricultural Land given that the two PDAs were not considered suitable. This involved expanding the search area to include BMV agricultural land. While EN-3 (2023) (Ref.2) does not prohibit the use of BMV land and recognises that NSIP scale solar schemes are likely to include some agricultural land, with the preference is to prioritise poorer quality land. The Applicant has sought to identify available land of lower grade adjacent to the project objectives. However, as the provisional mapping demonstrates, there is an abundance of both Grade 3 and Grade 2 land in relative proximity to the Scheme. To deliver the proposed capacity, it is likely that a significant percentage of BMV land would be required. EN-3 (2023) states at paragraph 2.10.29 that applicants should avoid the use of BMV "where possible," and this is what the Applicant has achieved in its site selection process.

6.2.27 Three additional PDAs were identified and assessed against the same planning, environmental and operational considered to determine if any of the sites are suitable. Another issue is with finding landowner/s willing to lease the land which is an important consideration. Without a willing landowner/s land would need to be acquired through the compulsory purchase which can be a complex, time consuming and costly process.

6.2.28 It is acknowledged that Site G is located in an area identified as a suitable location for solar development, set out in EMKLP Policy GS7. Part C of EMKLP Policy GS7 states that proposals for solar development will be supported if it can be demonstrated that the proposal would:

- Provide a suitable restoration plan; and

6.2.29 Not to lead to adverse cumulative impacts in combination with other energy development in the surrounding area.In summary, the Applicant has demonstrated that they have carried out an extensive site selection process which is detailed in Site Selection Assessment **[REP1-037].** Alternative layouts for the solar panel areas, alternative substation locations and alternative cable routes have all been considered from the early scoping stages of the Scheme through to submission of the DCO application. Matters raised by stakeholders in relation to alternatives at the EIA Scoping and Statutory Consultation Stages have helped to shape the development of the Scheme. This iterative design process has resulted in the Scheme meeting the requirements of the Energy NPSs in the context of efficiently delivering large scale renewable energy infrastructure. It also provides a new network of environmental features which deliver a range of ecosystem services, incorporating biodiversity, heritage, landscape and access.

6.3 Good Design

6.3.1 In accordance with policy requirements, the approach to achieving good design was considered at the outset of the project, and the Applicant developed a framework for good design which was then used to inform the proposals from an early stage.

6.3.2 This section should be read in conjunction with the Policy Compliance Document **[REP4-014]**.

6.3.3 Good design outcomes will be secured in the detailed design of the Scheme, in accordance with the ES assessment, via control documents secured by the draft DCO **[EX6/GH3.1_E]**. Adherence to the control documents will secure good design outcomes, secure mitigation to manage the Scheme in accordance with the conclusions of the ES and provide flexibility.

6.3.4 The overarching vision for the development seeks to ensure that the Scheme contributes to renewable energy policy targets and objectives, which includes responding positively to the existing site context, baseline analysis and assessment of potential impacts. The Scheme seeks to deliver a design that positively responds to its locational context, delivers on the potential substantial benefits to energy production, climate change, and biodiversity enhancement, whilst keeping negative impacts on the local and wider environment to a

minimum. Design objectives were set by the Applicant and the project team to meet these criteria. These objectives have been formulated to align with guidance published by the National Infrastructure Commission, Solar Energy UK and BRE.

6.3.5 The Scheme Design has gone through several stages of design, A detailed description of the design stages and the changes made to the design of the evolving scheme at each stage is set out in ES Chapter 5: Alternatives and Design Evolution **[APP-042].** This includes details of the changes in terms of the extent of the Order limits and the layout of the land within the Order limits. The Applicant adopted 8 Design Principles to guide the design of the Scheme at an early stage.

6.3.6 These Strategic Principles are set out in section 4 of the Design Approach Document **[APP-560].** The project specific design principles are as follows:

- The design of the Scheme will be landscape led exploring the intrinsic character and beauty of the surrounding countryside.
- Adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the project from construction through to operation and maintenance and decommissioning.
- The Scheme will deliver a minimum 10% net gain for biodiversity through strategic habitat creation and enhancement measures.
- The Scheme's design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change.
- The Scheme will be carefully designed to minimise where practicable impacts on amenity from air quality, traffic and noise effects and safeguard the health and safety of local residents by securing suitable control measures during construction, operation and maintenance and decommissioning of the Scheme.
- The design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening.
- The Scheme will be sensitive to existing land uses where practicable and maximise opportunities to strengthen green and blue infrastructure.
- The Scheme will seek to minimise the effects of the development on Public Rights of Way (PRoW) by incorporating measures to maintain, and where practicable, explore opportunities to improve the local PRoW network.

6.3.7 The Landscape and Ecological Mitigation Plans **[EX6/GH6.4.4.10_D, EX6/GH6.4.4.11_C, APP-209, REP3-046, APP-211, EX6/GH6.4.4.14_C, EX6/GH6.4.4.15_C, APP-214, APP-215, REP3-052, REP1-113, REP3-054, EX6/GH6.4.4.20_B]** submitted with the DCO application consists of the illustrative layouts. The Landscape and Ecological Mitigation Plans demonstrate how the Applicant has pursued the development of an exemplar scheme that meets the design objectives set within Section 4 of the Design Approach Document **[APP-560]** that is sensitive to its receiving environment, mitigates

impacts, provides benefits to local communities whilst making a significant contribution to renewable energy generation.

6.3.8 Adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning. The Scheme design will follow the mitigation hierarchy, seeking firstly to avoid impacts to sensitive receptors. Where this is not practicable, unavoidable impacts will be mitigated or, as a last resort, compensated for. Adherence to the mitigation hierarchy as a fundamental principle will reduce the potential for the Scheme to result in significant adverse effects on sensitive receptors where practicable.

6.3.9 The Draft DCO **[EX6/GH3.1_E]** submitted with the application includes pre-commencement DCO Requirements in Schedule 2 for the submission and approval of detailed design proposals prior to construction. These Requirements are intended to, and would have the effect of, clarifying the construction and operational sequencing of the Scheme.

6.3.10 Schedule 2 to the DCO sets out the Requirements in accordance with which the Scheme must be constructed, operated, maintained and decommissioned. This includes a requirement that the Scheme is developed in accordance with the Concept Design Parameters and Principles **[EX6/GH7.17_B]** and that the detailed design of the Scheme will be required to be submitted to and approved by the relevant planning authorities.

6.3.11 The layout of the Scheme will be carefully designed to minimise impacts where practicable to amenity from air quality, traffic and noise effects and safeguard the health and safety of local residents by securing suitable control measures during construction, operation and maintenance and decommissioning of the Scheme. The design of the Scheme will be informed by the process of environmental assessment and the inclusion of mitigation measures to minimise, where practicable, any impacts to the amenity of the local communities located nearby. Control documents will be prepared to control and manage the environmental and transport impact to communities during construction, operation and maintenance and decommissioning of the Scheme.

Summary

6.3.12 In summary, the policy and guidance documents that have informed the Applicant's approach to good design include EN-1 (2023), EN-3 (2023) and the National Infrastructure Commission's (NICs) 'Design Principles for National Infrastructure' report (Ref.28). Good design has been a fundamental consideration from the outset of the Scheme.

6.4 Climate Change

6.4.1 Paragraph 4.10.8 of EN-1 (2023) states that applicants must consider the direct and indirect impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. Paragraph 4.10.5 of EN-1 (2023) states that applications should take reasonable steps to maximise the use of nature-based solutions which can also result in

biodiversity benefits as well as increasing absorption of carbon dioxide from the atmosphere in adapting to climate change.

6.4.2 EN-1 (2023) continues at paragraph 4.10.13 to advise that the SoS "*should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change*". At 4.10.15 it continues to state that SoS should "*be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be affected by more radical changes to the climate beyond that projected by the latest set of UK climate projections*".

6.4.3 Paragraph 2.4.11 of EN-3 (2023) discusses the introduction of solar photovoltaics and how they are typically proposed within low-lying exposed sites. For these types of proposals, applicants should consider how the equipment is resilient to increased risk of flooding and the impact of higher temperatures.

6.4.4 Paragraph 2.3.2 of EN-5 (2023) requires the consideration of the effects of flooding (particularly on substations that are vital for the electricity transmission and distribution network), winds and storms (on overhead lines), higher average temperatures (leading to increased transmission losses), earth movement or subsidence caused by flooding or drought (on underground cables) and coastal erosion (for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively).

6.4.5 Building resilience in changing climate has been one of the 10 concept design parameters and principles employed during the design of the Scheme. As set out in the Concept Design Parameters and Principles **[EX6/GH7.17_B].** The document defines the key design parameters which reflect the worst-case scenario adopted in the Environmental Impact Assessment that has been undertaken for the Scheme. As the detailed design of the Scheme will be in accordance with these assessed parameters, the conclusions of the ES will be upheld.

6.4.6 The design process for the Sites has incorporated a number of offsets from features such as drainage ditches, watercourses, water bodies, hedgerows and tree lines, tree canopies, utilities, public rights of way, and residential dwellings, as identified in the Concept Design Parameters and Principles **[EX6/GH7.17_B]**.

6.4.7 The design of the Scheme to ensure that no built structures (central inverters, substation and Collector Compounds) would be located within Flood Zones 2 or 3. This will be above the calculated flood height level for the maximum credible scenario as assessed within the Flood Risk Assessment and Drainage Strategy Report **[REP5-021]**. Therefore, Solar PV modules within Flood Zone 2 or 3 are flood risk resilient as they are designed to avoid flooding.

Summary

6.4.8 in summary the Scheme provides a significant beneficial effect in terms of impacts on greenhouse gas emissions and the type of infrastructure that is defined as urgent by the UK Government and has been defined as a Critical National Priority. The ES concludes that up to 186,306 tCO2e will be saved over the operational lifetime of the project in comparison to the same electricity

generated by a combined-cycle gas turbine. It is considered that the Scheme strongly complies with the relevant policy set out in EN-1 (2023) and EN-3 (2023) and that the beneficial impact attracts substantial weight in the planning balance.

6.5 Landscape and Visual Assessment

6.5.1 As detailed in ES Chapter 8: Landscape and Visual Impact **[APP-045]**, the landscape and visual impacts of the Scheme have been assessed in accordance with paragraphs 5.10.1-5.10.38 of the EN-1 (November 2023), paragraphs 2.10.131-2.10.133 of EN-3 (November 2023) and paragraphs 2.9.7-2.9.25 of NPS EN-5 (November 2023). The assessment includes reference to the relevant landscape character assessments and any significant effects. In making the assessment, a range of factors have been considered, including visibility, views, visual amenity, light pollution, local amenity, tranquillity and nature conservation.

6.5.2 The following paragraphs set out the landscape and visual effects of the Scheme during operation, construction and decommissioning, including cumulative effects.

Landscape and Visual Effects during Operation

6.5.3 Paragraphs 5.10.1-5.10.6 of EN-1 (November 2023) acknowledge the fact that landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. They state that virtually all nationally significant energy infrastructure projects will have effects on the landscape and the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. Local planning policies need to be considered in light of this as they have not been developed to take account of the likely level of impact of large-scale infrastructure associated with NSIPs, nor the nationally significant level of benefit arising from such projects.

6.5.4 Paragraph 5.10.35 of EN-1 (November 2023) states that outside of designated landscapes, the decision maker should "…*judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project." Paragraph 5.10.36 of EN-1 (November 2023) sets out that in considering the above, the decision maker should take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale*."

Landscape Assessment

6.5.5 In accordance with paragraphs 5.10.1 to 5.10.6 of EN-1 (November 2023), the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change have been considered in judging the impact of the Scheme on the landscape. National Parks and National Landscapes (formerly known as Areas of Outstanding Natural Beauty (AONBs)) are given a high status of protection, set out in paragraph 2.10.157 of EN-3 (November 2023) and paragraph 189 of the NPPF. There are no national landscape designations (National Parks and National Landscapes) within the Order limits, which have been used to assess landscape and visual effects, as explained at Section 8.6

(Existing Landscape Baseline) of ES Chapter 8: Landscape and Visual **[APP-045]**. The Scheme is, therefore, policy compliant in terms of avoiding impacts on National Parks and National Landscapes.

6.5.6 There are a number of local planning policies that include reference to landscape and visual impacts. The key ones include:

- NNJCS Policy 3 – seeks to be located and designed in a way that is sensitive to its landscape setting.
- WNJCS Policy BN5 – requires proposals to be sympathetic to locally distinctive landscape features.
- DLP Policy ENV1 – requires a proposal to respect the local distinctiveness of the particular landscape character in which it is located.
- SNLP Policy NE2 – Within Special Landscape Areas, development should avoid harmful impacts.
- MKLP Policy NE5 – requires proposals to demonstrate that landscape character has been conserved and enhanced through sensitive design, landscape mitigation and enhancement measures.
- EMKLP Policy CEA12 – requires development that affect Special Landscape Areas will only be permitted where it conserves and enhances the special character, protects important views and tranquillity of the area and retains access to the countryside.

6.5.7 The Scheme has also considered the Mears Ashby Village Design Document. Site E around the village to the south has been set back off the valley slopes and is therefore in accordance with the guidelines set out in the Design Document.

6.5.8 Regarding EMKLP Policy CEA12, it is also important to note that the proposed extension to the Ouse Valley Special Landscape Area in which Site G is located in Milton Keynes's emerging Local Plan, has also been put forward as areas of search for wind turbines and solar farms under EMKLP Policy GS7. Therefore, the proposal is considered to be in compliance with EMKLP Policy CEA12.

6.5.9 The design of the Scheme has taken detailed account of the landscape and landform in which it sits and has given careful consideration to its impact on views from sensitive receptors. These have been factored into the design development at all stages as explained within the Design Approach Document **[APP-560]** and ES Chapter 5: Alternatives and Design Evolution **[APP-042]**.

6.5.10 EBNP Policy EB D1 states that any development proposals should protect, conserve and enhance the natural environment including key landscapes.

6.5.11 Although the study area for assessment is outside to nationally designated landscapes, paragraph 5.10.16-5.10.17 of NPS EN-1 (November 2023) expect the consideration of local planning policies which have been based on landscape character assessments.

6.5.12 ES Chapter 8: Landscape and Visual Impact **[APP-045]** identifies the published national, regional county and district landscape areas that the Scheme and the applicable study area interacts with. ES Figure 8.5 **[APP-259]** illustrates the

Landscape Character Areas that have been identified. ES Chapter 8: Landscape and Visual Impact **[APP-045]** assesses the impact of the operational phase of the Scheme on character areas. The assessment set out in ES Chapter 8: Landscape and Visual **[APP-045]** concludes that the Year 1 Operation, the Scheme will have a moderate/minor neutral effect on the landscape fabric. Landscape Fabric is defined as the individual tangible elements or features, such as landform, woodland, hedges, tree cover, vegetation, which can be described and quantified.

6.5.13 At Year 15 of operation and decommissioning, the Scheme will have a moderate beneficial effect on the landscape fabric. This is due to the Scheme providing significant landscape enhancements. These landscape enhancements comprise:

- 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.

6.5.14 As set out in Section 6.4 of this Planning Statement and described within ES Chapter 8: Landscape and Visual Impact **[APP-045]**, the Scheme has been the subject of an iterative design process, informed by analysis of landscape and visual constraints, iterative impact assessments and mitigation proposals. The landscape mitigation measures and residual landscape effects at Year 15 are set out in ES Chapter 8: Landscape and Visual Impact **[APP-045]**. The mitigation strategy and design development are based on the Landscape Design Parameters set out at Table 8.7 of ES Chapter 8: Landscape and Visual Impact **[APP-045]**. This has helped ensure that primary landscape mitigation is co-ordinated with other relevant disciplines, such as ecology, to determine the key parameters and agree offsets to improve the value of landscape and reflect appropriate local, regional and national aims and objectives for ecology and biodiversity.

6.5.15 The principles described below have been incorporated to ensure that the landscape impacts are minimised and significant adverse effects for landscape and visual amenity to the wider area are avoided, where possible. The principles are secured by the Works Plan **[EX6/GH2.4_G]**, which define where different Works are permitted to be located, and the Concept Design Parameters and Principles **[EX6/GH7.17_B]**, which set out parameters and principles with which the Scheme is required to comply. These include:

1. Careful siting of the built elements of the Scheme, such as substations and battery storage to avoid areas of the Site where they would be more visually prominent in the landscape and could benefit from existing screening where possible.

2. Refinement of the Order Limits and the extent of built structures in order to provide stand-offs and to retain key views from residential properties, heritage assets, roads and footpaths.
3. Conserving existing landscape features and vegetation, such as woodland, trees and hedgerows by excluding them from, and providing offsets to, any structure to be installed or constructed as part of the Scheme.

6.5.16 Creating new green infrastructure within the Order limits through the implementation of new woodland, hedgerows and native grassland to improve the landscape structures, screening of the Scheme. This is shown by the Outline Landscape and Ecological Management Plan (OLEMP) **[EX6/GH7.4_E]**.

4. Sensitive design in relation to form, colour and materials. This include ensuing that the Cable Route will be underground, thereby avoiding the introduction of new tall linear features in the landscape which would increase the extent of the Scheme's visibility. Proposed perimeter fencing has also been carefully selected to minimise its visual prominence.

6.5.17 Sensitive design of lighting to avoid and minimise the potential for adverse landscape and visual effects. Sensitive lighting principles employed by the Scheme are summarised in ES Chapter 4: Scheme Description **[EX6/GH6.2.4_B]**. These provide details on the directionality and intermittency to minimise the impact. In addition, motion sensitive security lighting will be provided within substations and the BESS to be used only for maintenance and security purposes during the operational phase of the Scheme.

6.5.18 The approach outlined above is in direct accordance with paragraph 5.10.27 of EN-1 (November 2023), which states:

"*Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as well as sympathetic landscaping and management of its immediate surroundings*."

6.5.19 The landscape effects during operation of the Scheme complies with EN-1 (November 2023). ES Chapter 8: Landscape and Visual Impact **[APP-045]** concludes that the design of the Scheme has been successful in ensuring that there are no identified significant adverse effects on the landscape at Year 1 of operation of the Scheme with regard to landscape fabric. ES Chapter 8: Landscape and Visual Impact **[APP-045]** acknowledges that there will be a significant moderate adverse impact on the local study area (1km) as the proposed mitigation planting (hedgerow reinforcement, new hedgerows and reinforced roadside planting) would be limited. However, despite the newly planted vegetation being immature, existing hedgerows would have begun to grow out at Year 1 and the varied grassland will have become established, starting to create valuable habitats across all the Sites. It adds that, overall, this will help link habitats and strengthen the overall character locally and maintain a sense of place. The landscape scheme provides opportunities to increase the local vegetation cover, buffering and connecting existing fragmented vegetation, which helps to create a more resilient and biodiverse landscape. The impact on

the study area reduces to a moderate/minor adverse effect, which is not significant, due to the maturation of the vegetation. It is acknowledged that the effect on the local study area (1km) at Year 1 of operation is an adverse effect, though not significant.

6.5.20 Paragraph 5.10.36 of EN-1 (November 2023) set out that in making a decision, the decision-maker should take account of whether any adverse impact on the landscape is capable of being reversed in a reasonable timescale. ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that on decommissioning the impact on the landscape fabric is a significant moderate beneficial effect and a minor adverse effect on the local study area (1km). Despite the continuing adverse impacts of the Scheme at Year 1 on the local study area, benefits (including need) of the Scheme, outweigh these impacts. The Scheme is also considered to comply with local planning policies as it has been shown not to result in significant harm during the operational phase. In fact, the Scheme is due to provide a significant moderate benefit at Year 15 due to the proposed planting measures, providing additional mitigation, contributing towards the Scheme's biodiversity net gain principles.

6.5.21 It is expected that alongside the regular maintenance of equipment, the replacement of equipment, such as panels and batteries will be required. The replacement of equipment is likely to be staged to maintain the electrical export to the National Grid. This activity would be considerably less intensive than during the Scheme's construction. Details of replacement are set out in more detail within ES Chapter 4: Scheme Description **[EX6/GH6.2.4_B].** The Outline Operational Traffic Management Plan **[EX6/GH7.9_C]** would control the management of traffic associated with the Scheme during operation.

Visual Impacts

6.5.22 In terms of visual effects paragraph 5.10.13 of EN-1 (November 2023) states that "*all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."* It adds that the decision maker "*will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project*."

6.5.23 Although introducing new energy generation infrastructure into the landscape will inevitably have some visual effects in accordance with paragraph 5.10.37 of EN-1 (2023), the Scheme has been carefully designed to minimise visual effects as far as possible. ES Chapter 8: Landscape and Visual Impact **[APP-045]** and ES Appendix 8.3 (ES LVIA Assessment Sheets) **[REP1-041]** presents an assessment of the impact of the Scheme on sensitive visual receptors. The cumulative visual effects on other cumulative development, Grendon Lakes (BESS), has also been considered.

6.5.24 Visual effects on viewpoints, PRoWs, transport routes and residential receptors have all been reduced through a range of mitigation measures set out in ES Chapter 8: Landscape and Visual Impact **[APP-045]**.

6.5.25 Table 8.14 of ES Chapter 8: Landscape and Visual **[APP-045]** sets out the effects of the Scheme on private receptors, namely farms and residential dwellings. The table cites 11 public receptors in the proximity of the Sites and the BESS that will have significant major/moderate-moderate adverse effects at Year 1 of operation. However, with the mitigation measures implemented (mature vegetation) then the effects at Year 15 at those 11 public receptors are not considered significant and have a moderate/minor adverse-minor effect. Although it is acknowledged that at Year 15, these effects are considered adverse, the benefits (including need) of the Scheme, outweigh these impacts.

6.5.26 Regarding transport receptors, Table 8.15 of ES Chapter 8: Landscape and Visual Impacts **[APP-045]** highlights 14 transport receptors in the proximity of the Sites that have significant major/moderate-moderate adverse effects at Year 1 of operation. However, with the implementation of the mitigation measures, the effects on those receptors at Year 15 are not considered significant have a range of moderate/minor to negligible adverse effect. Although it is acknowledged that at Year 15, these effects are considered adverse, the benefits (including need) of the Scheme, outweigh these impacts.

6.5.27 With respect to the public receptors (namely PRoWs), Table 8.16 of ES Chapter 8: Landscape and Visual Impact **[APP-045]** sets out 27 public receptors in the proximity of the Sites that will have significant effects at Year 1 of operation. However, with the implementation of mitigation measures, then the effects at Year 15 at all except three receptors are not considered significant and have a range of moderate/minor-minor adverse effect. Although it is acknowledged that at Year 15, these effects are considered adverse, the benefits (including need) of the Scheme, outweigh these impacts.

6.5.28 The three public receptors that will continue to have significant effects at Year 15 (residual significant adverse effects) are detailed in Table 8.21 of Chapter 8: Landscape and Visual Impact **[APP-045]**, with further details set out at Appendix 8.3: LVIA Assessment Sheets **[REP1-041]**. At Year 15, the three public receptors are considered to have a significant major/moderate adverse effect (reference: TP184) and moderate adverse effects (references: TP091 and TP181).

6.5.29 The limiting of significant adverse residual effects at Year 15 of operation to the above three receptors is the direct result of the careful and detailed iterative design process. Through this process, the Scheme has been carefully sited in the landscape and refined through design development to respond to the existing character of views.

6.5.30 As recognised in paragraphs 5.10.29-5.10.38 of EN-1 (2023) all proposed energy infrastructure is likely to have visual effects for many receptors and are not considered to outweigh the benefits of the project, set out at Section 4 of the Planning Statement. The Scheme is therefore, considered to comply with the policy requirements set out in the above paragraphs.

6.5.31 The significant harm to the three visual, public receptors will, in this case, be demonstrably outweighed by the overriding benefits of the Scheme, as set out in Section 4 of the Planning Statement, allowing the Scheme to be approved as an exceptional case. The visual harm has been minimised and mitigated, as

required, and shown within ES Chapter 8: Landscape and Visual Impact **[APP-045]**.

Landscape and Visual Effects during Construction and Decommissioning

6.5.32 Landscape and visual impacts will be minimised during construction and decommissioning through delivery of the Outline LEMP **[EX6/GH7.4_E]**. Measures to reduce construction and decommissioning phase impacts are also set out in the Outline Construction Environmental Management Plan **[EX6/GH7.1_C]** and Outline Decommissioning Statement [**EX6/GH7.3_C]**.

6.5.33 ES Chapter 8: Landscape and Visual Impact **[APP-045]** assesses the temporary impacts of the Scheme on the landscape and on visual amenity of sensitive receptors during construction and decommissioning periods.

6.5.34 During construction Table 8.13 of ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that there is no significant effect on the landscape fabric. At the decommissioning phase, the effect is considered to be significant by moderate beneficial due to the retention of the landscape mitigation, providing a long-term benefit towards Legacy Landscape.

6.5.35 During construction, Table 8.13 of ES Chapter 8: Landscape and Visual Impact **[APP-045]** states that there will be a significant moderate adverse effect on the Local Study Area (1km). This is because the embedded mitigation will not have been implemented and therefore, there will be an immediate change to the character of the Sites' immediate surroundings. The infrastructure would be visible above the boundary hedgerows and local vegetation but would be limited to locations within the local context. However, once the embedded mitigation comes to fruition at Year 15, the effect is not considered significant and will remain the case at the decommissioning phase, although it is acknowledged that the effect at decommissioning will be minor adverse. The benefits of the Scheme (including need) of the Scheme outweigh these impacts.

6.5.36 During construction, Table 8.14 of ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that there will be significant effects (ranging from major/moderate-moderate adverse) on 11 private receptors. However, at Year 15, these effects will become 'not significant' due to the presence of embedded mitigation. This will remain the case at the decommissioning stage with effects ranging from moderate/minor adverse to no effect. Although it is acknowledged that the decommissioning phase, some of these receptors are considered to have adverse effects, the benefits (including need) of the Scheme, outweigh these impacts.

6.5.37 During construction, Table 8.15 of the ES Chapter 8: Landscape and Visual **Impact [APP-045]** states that there will be significant effects on 14 transport receptors (ranging from major/moderate-moderate adverse). However, at Year 15, these effects will become 'non-significant' due to the presence of embedded mitigation. This will remain the case at the decommissioning stage, with effects ranging from minor adverse to no effect at the decommissioning phase. Although it is acknowledged that the decommissioning phase, some of these receptors are considered to have adverse effects, the benefits (including need) of the Scheme, outweigh these impacts.

6.5.38 During construction, Table 8.16 of ES Chapter 8: Landscape and Visual Impact **[APP-045]** states there will be a significant effect on 27 public receptors ranging from major/moderate-moderate adverse. However, with the implementation of mitigation measures, then the effects at the decommissioning phase of all but two receptors are not considered significant and have a range of moderate/minor-minor adverse effects. Although it is acknowledged that the decommissioning phase, some of these receptors are considered to have adverse effects, the benefits (including need) of the Scheme, outweigh these impacts.

6.5.39 The two public receptors that will continue to have significant effects at Year 15 (residual significant adverse effects) are detailed in Table 8.21 of ES Chapter 8: Landscape and Visual Impact **[APP-045]**, with further details set out at Appendix 8.3: LVIA Assessment Sheets **[REP1-041]**. These two public receptors are considered to have a significant major/moderate adverse (reference: TP184) and moderate adverse effect (reference: TP091).

6.5.40 Despite these residual significant effects during construction phase for the private, public and transport receptors and the significant effect during the decommissioning phase on two public receptors, the benefits (including need) of the Scheme outweigh these significant impacts. Therefore, the Scheme is in accordance with paragraph 5.10.34 of EN-1 (November 2023). The mitigation measures set out in ES Chapter 8: Landscape and Visual Impact **[APP-045]** has mitigated the effects of the Scheme on all the receptors during all phases of the Scheme.

6.5.41 With respect to cumulative effects, only the Grendon Lakes BESS is located within the Study Areas. It is located on low-lying land that is greatly enclosed by surrounding field boundary hedgerows, meaning that it is well accommodated and discrete in the landscape. In combination the Scheme and the Grendon Lakes BESS would lead to an intensification of energy infrastructure in this area. Despite this intensification, the receiving landscape has the ability to accommodate the Scheme and Grendon Lakes BESS without resulting in any overall increase in the Significance of Effects.

6.5.42 From within the Wider Study Area, the containment effects of both the Scheme and the Grendon BESS on the character of the wider area would be very limited and not wide ranging and therefore, no resulting in any overall increase in the Significance of Effects.

6.5.43 In terms of the visual effects, it is acknowledged that there is intervisibility with the Grendon BESS for users of the PRoW TP155. ES Chapter 8: Landscape and Visual Impact **[APP-045]** acknowledges that the cumulative effect of both the Scheme and the Grendon BES would result in a greater visual change along the PRoW than just the Scheme in isolation. However, proposed planting mitigation around the Green Hill BESS would provide additional screening, reducing the effect from Major (significant) during construction and at Year 1 to Moderate (significant) at Year 15 as the views would be limited to the tops of the taller infrastructure. The Grendon BESS would be closer and more prominent to users of the PRoW, leading to adverse visual impacts.

Green Infrastructure Provision

6.5.44 Paragraph 5.11.6 of EN-1 (November 2023) explains that the Government's policy is to ensure there is adequate provision of high quality open space (including green infrastructure) and sports and recreation facilities to meet the needs of local communities. Green infrastructure, in particular, will play an increasingly important role in mitigating or adapting the impacts of climate change.

6.5.45 NNJCS Policies 4 and 19 seek development to contribute towards biodiversity and landscape improvements. WLP Policy GI 1 seeks to protect and enhance existing green infrastructure networks. WNJCS Policy S10 requires new development to promote the creation of green infrastructure networks and WNJCS Policy BN1 seeks to protect existing green infrastructure connections. DLP Policy ENV4 seeks the protection, enhancement and restoration of the District's green infrastructure. MKLP Policy NE4 seeks the protection and enhancement of the green infrastructure network.

6.5.46 Enhancement of biodiversity is a key principle of the Scheme as outlined within the Design Approach Document **[APP-560]**, under Principle 2. The existing network of green infrastructure within and surrounding the Sites will be maintained and enhanced. The following proposed planting would lead to biodiversity net gains:

- 14.45ha of green corridor and woodland planting.
- 12.81ha enhanced Riparian Native Planting.
- 43.14m of hedgerow reinforcement and reinforced roadside vegetation.
- 15.61km of proposed hedgerow.
- Six proposed ponds and wader scrapes; and
- 1,079.53ha of groundcover.

6.5.47 The Biodiversity Net Gain Assessment **[REP1-043]** confirms that the Scheme will result in an overall significant net gain biodiversity, including an anticipated net gain of 57.01% for habitats, a net gain of 13.86% for hedgerows and a net gain of 12.86% for river units. Further details on the significant measures to enhance the green infrastructure, detailed above, is set out in the OLEMP **[EX6/GH7.4_E]**. These measures will ensure a nature inclusive design and represent a substantial enhancement to the green infrastructure network.

6.5.48 The Scheme therefore complies with paragraph 5.11.6 of EN-1 (November 2023) as it provides significant green infrastructure as an integral part of the Scheme. It also complies with the local planning policies, set out above, which relate to the retention and enhancement of green infrastructure.

Summary

6.5.49 In accordance with paragraph 5.10.27 of EN-1 (November 2023), the design of the Scheme has taken account of the landscape and landform in which it sits and has given careful consideration to its impact (including cumulative impact) on sensitive receptors. These have factored into the design development at all

stages, and the design and has directly and effectively responded to potential impacts identified in relation to landscape and visual impact.

6.5.50 In considering the acceptability of the landscape and visual impacts of the Scheme, it is noted that paragraphs 5.10.4-5.10.6 and 5.10.13-5.10.15 acknowledge that NSIP scale energy generating infrastructure is likely to have landscape and visual effects.

6.5.51 Taking account of the above, and in accordance with paragraph 5.10.35 of EN-1 (November 2023), it is considered that the three significant adverse residual visual effects of the Scheme at Year 15 and two at the decommissioning phase are clearly and comprehensively outweighed by the benefits of the Scheme, as set out at Section 4 of the Planning Statement, in terms of delivering renewable energy infrastructure, which is urgently needed to create a secure and affordable energy system and to help combat climate change. Furthermore, there will be a significant moderate benefit on the landscape fabric on the decommissioning of the Scheme, due to the Landscape Legacy and retention of the mitigation planting. Although it is acknowledged that there will be an adverse effect on the local study area (1km) and private, transport and public receptors at Year 15 of operation and during the decommissioning phase, these benefits of the Scheme (including need) significantly outweigh these adverse effects.

6.5.52 With regard to cumulative effects, ES Chapter 8: Landscape and Visual Impact **[APP-045] h**as acknowledged that there will be a major (significant) effect on PRoW TP155 during construction and at Year 1 of operation due to the in-combination impact of the Scheme and the Grendon Lakes BESS. However, the proposed planting and mitigation measures of the Scheme reduces the effect to moderate (significant) at Year 15. This planting ensures that views of the Scheme's BESS 1 and 2 and the substation would be limited to the tops of taller infrastructure from the PRoW.

6.5.53 In terms of local policy, the harm has been minimised and mitigated as far as possible as set out in Chapter 8: Landscape and Visual Impact **[APP-045]**. Therefore, the Scheme is considered to comply with NNJCS Policy 3, WNJC Policy BN5, DLP Policy ENV1, SNLP Policy NE2, MKLP Policy NE5 and EMKLP Policy CEA12.

6.5.54 The Scheme also delivers significant green infrastructure enhancement and is, therefore, compliant with local plan policies NNJCS Policies 4 and 19, WLP Policy GI 1, WNJCS Policy S10, WNJCS Policy BN1, DLP Policy ENV4 and MKLP Policy NE4.

6.6 Ecology and Biodiversity

6.6.1 This section reviews the Scheme in the context of planning policy for biodiversity and nature conservation. This section should be read in conjunction with policy accordance tables in Policy Compliance Document **[REP4-014]**.

6.6.2 Paragraph 5.4.39 of the EN-1 (2023) states that the SoS should have regard to the aims and goals of the government's Environmental Improvement Plan 2023 and any statutory targets set under the Environment Act (2021) or elsewhere, recognising that failure to address the challenge of climate change will result in

significant adverse impacts to biodiversity. EN-3 (2023) paragraph 2.3.7 also refers to the ambition set out in the Environmental Improvement Plan 2023 and any targets set under the Environment Act (2021) or elsewhere in the context of maintaining or extending existing habitats and potentially creating new habitats.

6.6.3 As explained in the Statement of Need **[APP-556]**, the Scheme has the potential to deliver significant amounts of low-carbon electricity and make a material contribution to help meet the UK's commitments to decrease carbon emissions and reach net zero by 2050. Failure to deliver infrastructure projects that deliver low carbon electricity would, in effect, materially damage the UKs prospects of meeting its target to address climate change and result in substantial adverse impacts to biodiversity.

6.6.4 Paragraph 5.4.17 of EN-1 (2023) states that projects should include an ES that clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity.

6.6.5 The biodiversity and nature conservation impacts of the Scheme are considered in ES Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]**. The Chapter sets out all the designated sites (international, national, and local) of ecological and geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area for ecology and biodiversity.

6.6.6 EN-3 (2023) paragraph 2.5.2 states proposals for renewable energy infrastructure should demonstrate good design to mitigate impacts such as noise and effects on ecology. From the outset of the site selection exercise the Scheme has sought to embed good design into its approach. One of the key considerations at site selection stage, as set out in the Appendix 5.1 Site Selection Report **[REP1-037]**, was to avoid land which contained sensitive ecological and biodiversity related designations and the Scheme was successful in this regard, with no international or national statutory designations being potentially impacted by the Scheme.

6.6.7 EN-1 (2023) paragraph 5.4.19 states that applicants should show how projects have taken opportunities to conserve and enhance biodiversity conservation interests. Paragraph 5.4.21 of EN-1 (2023) adds that the design process "should embed opportunities for nature-inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains".

6.6.8 In response, biodiversity conservation considerations have informed the design of the Scheme from the outset and are embedded into the layout of the Site as identified in the submitted OLEMP **[EX6/GH7.4_E]** which is secured in the DCO application. In addition, the Design Approach Document **[APP-560]** sets out a number of Project Principles, which have informed and guided the design development to date.

6.6.9 A Biodiversity Net Gain Assessment is included at Appendix 9.13 to the ES Volume 3 **[REP1-043]**. This sets out that the Scheme will achieve a minimum

BNG of 10% which is secured in the OLEMP **[EX6/GH7.4_E]** which is secured through requirement 7 of the Draft DCO **[EX6/GH3.1_E]**

6.6.10 ES Volume 1, Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** outlines the surveys completed that informed the DCO application. A description of the ecological baseline conditions identified is set out in the submitted Preliminary Ecological Appraisal at Appendix 9.1 **[APP-084]**. The further surveys work, desk study and consultation responses are contained in Appendix 9.2 to 9.12 **[APP-085 to APP-095]**.

6.6.11 The embedded mitigation is described in section 9.8 of ES Volume 1, Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** and includes a comprehensive suite of measures to both limit potential impact but also improve quality of habitats on Site. Measures specifically relate to the following receptors:

- Hedgerows, Trees and Woodland;
- Ponds and Watercourses;
- Badgers;
- Bats;
- Otters and Water Voles;
- Brown Hare;
- Harvest Mouse, Hedgehog, Polecat;
- Amphibians;
- Reptiles;
- Breeding Birds;
- Overwintering Birds;
- Invertebrates; and
- Plants.

6.6.12 The Hedgerow Removal Schedule detailed in the draft DCO **[EX6/GH3.1_E]** contains the specific identity of the hedgerow that is proposed to be removed, the locations for hedgerow, the length of removal and the reason for the removal.

6.6.13 Paragraph 5.4.4 of the EN-1 (2023) notes that important sites for biodiversity are those identified through international conventions and the Habitats Regulations. Paragraph 5.4.49 of EN-1 (2023) confirms the SoS must "consider whether a project may have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects". The Scheme does not impact on any site or species protected under the aforementioned regulations. The Habitats Regulations Assessment **[REP5-079]** sets out the embedded mitigation measures to control and limit pollution during construction, operation and decommissioning will minimise the likelihood and severity of any pollution effects.

6.6.14 The submitted OCEMP **[EX6/GH7.1_C]** and ODS **[EX6/GH7.3_C]** include specific measures to manage and avoid any potential further impact on the local areas of biodiversity and ecological importance from accidental damage and other indirect effects during construction or decommissioning. The OEPMS **[EX6/GH7.5_D]** also includes mitigation measures including precautionary principles approach to removal works to minimise the effects of the construction and operational phases of the Scheme.

6.6.15 Paragraph 5.4.12 of EN-1 (2023) advises that sites of "regional and local biodiversity and geological interest, are of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery". At paragraph 5.4.17 of EN-1 (2023) it sets out requirements that the applicant should ensure that "the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological importance". ES Volume 1, Chapter 9: Ecological and Biodiversity **[EX6/GH6.2.9_B]** provide details of the survey work undertaken and the full assessment of potential effects.

6.6.16 During construction, the Ecological and Biodiversity chapter concludes that no significant effects on the above LWS and PWVs have been identified during the operational phase of the Scheme. No additional mitigation measures are required, and no residual effects are anticipated.

6.6.17 According to the OLEMP **[EX6/GH7.4_E]**, the length of individual instances of temporary hedgerow removal required for access and the Cable Route Corridor will range between 3 and 10.1m in order to accommodate a maximum arrangement of the cable trench, a haul route and a passing bay. The length of individual instances of permanent hedgerow removal during the operational period for the Scheme will range between 3 and 6.5m, in keeping with typical gap sizes in an agricultural setting. Indicative locations of hedgerow works relating to access points and the Cable Route Corridor are assessed in the Crossing Schedule **[EX6/GH7.18_B]**.

6.6.18 Further details on the methodology to be followed during the hedgerow works as well as the reinstatement/replanting of temporarily affected hedgerows is contained within Section 7.3 of the OEMPS **[EX6/GH7.5_D].**

6.6.19 The ES identifies that this represents an adverse effect although it is at local level and not significant. Despite the overall value of the habitats there were no species of principal importance for conservation identified during surveys.

6.6.20 Paragraph 5.4.32 of EN-1 (2023) sets out the policy for ancient woodlands and veteran trees. ES Volume 1, Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** confirms that there are no ancient woodlands contained within the Order Limits. However, buffers from any parcels of woodland, including those designated as County Wildlife Sites and Local Wildlife Sites (LWS)are proposed. Given that Nun Wood County Wildlife Site, Horn Wood Local LWS and Threeshire's Wood LWS are all located immediately adjacent to the Order Limits boundary and are designated for their ancient woodland habitats, these have all been buffered by a minimum of 30m from any development in order to minimise the likelihood of adverse impacts during the construction phase of the Scheme.

The mitigation measures are outlined in the OCEMP **[EX6/GH7.1_C]**, OOEMP **[EX6/GH7.2_D]**, OLEMP **[EX6/GH7.4_E]** and OEPMS **[EX6/GH7.5_D]** to ensure protection of the tree (and other trees) during the lifetime of the Project.

Biodiversity Net Gain (BNG)

6.6.21 Paragraph 4.6.1 of EN-1 (2023) explains that *biodiversity net gain "is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements*".

6.6.22 Paragraph 4.6.6 of EN-1 (2023) explains that energy NSIP proposals should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity where possible and, paragraph 4.6.7, encourages applicants to use the most current version of the DEFRA biodiversity metric to calculate their biodiversity baseline and inform their biodiversity net gain outcomes and to present this data as part of their application.

6.6.23 Paragraph 4.6.10 of EN-1 (2023) adds that BNG should be "*applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain.*"

6.6.24 Paragraph 5.4.46 of EN-1 (2023) discusses opportunities for building in beneficial biodiversity or geological features as part of good design, EN-1 paragraph 5.4.20 adds that this can help towards delivering biodiversity net gain, and that wider ecosystem services and benefits of natural capital should also be considered when designing enhancement measures.

6.6.25 Paragraph 2.3.7 of the EN-3 (2023) advises proposed enhancements should aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan 2023 and any statutory targets set under the Environment Act (2021) or elsewhere.

6.6.26 As explained in the Statement of Need **[APP-556],** the Scheme has the potential to deliver significant amounts of low-carbon electricity and make a material contribution to help meet the UK's commitments to decrease carbon emissions and reach net zero by 2050. Failure to deliver infrastructure projects that deliver low carbon electricity would, in effect, materially damage the UKs prospects of meeting its target to address climate change and result in substantial adverse impacts to biodiversity.

6.6.27 The Design Approach Document **[APP-560]** sets out the design process, which resulted in the indicative layout of the Scheme being designed to maximise the opportunities around enhancing and conserving biodiversity and geological conservation interests. A key aspect of this design process has been around identifying and retaining landscape features which are beneficial to the layout of the Scheme.

6.6.28 The biodiversity and nature conservation impacts of the Scheme are considered in Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B].** The Chapter sets out all the designated sites (international, national, and local) of ecological and geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area for ecology and biodiversity. It concludes that no significant impact will occur on the designated receptor sites subject to mitigation measures.

6.6.29 The Scheme will include the retention of strategic areas within the Site, which will be managed as suitable habitat for ground nesting birds, as secured in the OLEMP **[EX6/GH7.4_E]**. Additionally, there will be a creation of addition habitat for both the ground nesting birds and foraging bats present. Finally, there are proposals to protect the woodlands, hedgerows and trees; as well as new hedgerows to be created for habitats and enhancements. This approach is secured in the Management Objectives set out in the OLEMP.

6.6.30 The Scheme will achieve significant Biodiversity Net Gain as set out in Appendix 9.13 of Chapter 9 Ecology and Biodiversity **[EX6/GH6.2.9_B],** which also confirms that the potential impact on identified receptors will not be significant subject to the implementation of embedded mitigation measures in the OCEMP **[EX6/GH7.1_C]** and OEPMS **[EX6/GH7.5_D].**

Mitigation and Management

6.6.31 EN-1 (2023) paragraph 5.4.35 refers to appropriate mitigation measures as an integral part of the proposed development. Paragraph 5.4.36 states applicants should consider producing and implementing a Biodiversity Management Strategy as part of their development proposals and paragraph 5.4.44 indicates that appropriate requirements should be attached to any consent to ensure any mitigation measures are delivered and maintained. Paragraph 2.10.90 of the EN-3 states applicants should consider enhancement, management, and monitoring of biodiversity.

6.6.32 Paragraph 5.4.42 of EN-1 (2023) states that "*As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought*." As set out in the Site Selection Report at Appendix 1 to this Planning Statement, the Applicant sought from an early stage to seek to avoid sensitive ecological designations. The Scheme avoids all internationally and nationally designated sites within the Order Limits.

6.6.33 Earls Barton Meadow LWS is the only LWS identified within the Order Limits. This LWS lies within a section of the Cable Route Corridor between Green Hill E and Green Hill BESS. This site features a floodplain meadow adjacent to the River Nene and nearby gravel extraction areas. Earls Barton Meadow LWS is approximately 6.09ha in area, and approximately 1.215ha (approximately 20%) of this LWS (along the western boundary) lies within the Order Limits.

6.6.34 The Cable Route Corridor is approximately 340m to 410m wide at the point that it overlaps with Earls Barton Meadow LWS, within which a trench (maximum 3.5m width) will be sited. Following the installation of the cables, the cable will be buried and the land affected will be reinstated. Cable trenching routes within this section of the cable route which entirely avoid Earls Barton Meadow LWS, and instead are sited through the adjacent fields, will be pursued in the first instance.

6.6.35 Once the cable route is installed, it is understood that the cables will remain undisturbed for the life of the Scheme. Therefore, no significant impacts upon Earls Barton Meadow LWS are anticipated during the operational phase.

6.6.36 There are three Protected Wildflower Verges (PWV) within the Order Limits, although only a very small area of Bozeat Verge lies within the Order Limits (approximately 70m^2, or ~1.1% of the total area of the PWV). The remainder of this PWV extends south beyond the Order Limits, along the A509.

6.6.37 No significant effects on the identified LWS and PWVs have been identified during the operational phase of the Scheme. No additional mitigation measures are required, and no residual effects are anticipated.

6.6.38 To ensure the beneficial effects of the newly created habitats are fully realised an OLEMP **[EX6/GH7.4_E]** forms part of the control documents submitted alongside this Application. The OLEMP sets the framework for the detailed LEMP which will be required to be submitted and approved by each relevant Local Planning Authority and will set out how the newly created and retained habitats onsite will be managed throughout the operational phase of the Scheme.

6.6.39 The DCO Application is also accompanied by an outline Construction Environmental Management Plan (OCEMP) **[EX6/GH7.1_C] and** Outline Decommissioning Statement (ODS) **[EX6/GH7.3_C]**. These include mitigation measures which are intended to avoid negative impacts during the construction and decommissioning phases. The OCEMP and ODS set out locations of sensitive and retained features, and the measures for the protection of these features.

6.6.40 A Decommissioning Environmental Management Plan (DEMP) (or multiple DEMPs) and Decommissioning Traffic Management Plan (DTMP) will be produced and approved for the Scheme following the appointment of a contractor, prior to the commencement of the decommissioning phase of the Scheme. Approval and implementation of the DEMP and the DTMP will be secured through a Requirement of the DCO.

6.6.41 The detailed versions of the OCEMP and decommissioning and restoration plan are secured via requirements 14 and 21 respectively under the Draft DCO **[EX6/GH3.1_E]** and they will need to be approved by the relevant local planning authority prior the relevant stage of either construction or decommissioning. Some examples of the types of measures included in the OCEMP and ODS include management of earthworks associated with the construction compounds, access roads, and cable trenching.

Summary

6.6.42 From the outset of the Project, the Applicant has sought to ensure that the Scheme is guided by the environment. This is evident at site selection phase, where the Applicant purposefully sought land which did not include any highly sensitive ecological/biodiversity related designations. The Site overlaps the Earls Barton Meadow LWS but the proposed mitigation measures would avoid any significance effects during the construction and operational phases. The Applicant has proposed suitable protection, mitigation and, where possible, enhancement in order to reduce the impact of the Scheme. The Scheme will also provide an anticipated net gain of 57.01% for habitats, a net gain of 13.86% for hedgerows and a net gain of 12.86% for river units above the baseline, which is significant benefit.

6.6.43 Paragraph 5.4.39 of EN-1 (2023) requires the SoS to have regard to the aims and goals of the Environmental Improvement Plan 2023. The Scheme contributes positively to a number of the goals set out within the plan, notably in reference to this section, goal 9 'Enhancing Biodiversity' as well as future targets relating to BNG under the Environment Act (2021).

6.6.44 Paragraph 5.4.41 confirms that the SoS may take demonstrable net benefits into account in decision making. The Applicant has committed to a minimum 10% Biodiversity Net Gain, which is secured within ES Appendix 9.13 Biodiversity Net Gain Assessment **[REP1-043].**

6.6.45 In accordance with the aims and intentions of paragraphs 5.4.42 and 5.4.43 the Scheme has avoided significant harm to the key biodiversity interests at all levels within or within close proximity to the Order Limits. The Scheme poses potential risks of pollution events through the proximity of the BESS facility at Green Hill BESS to the SPA. While all adverse effects are considered to be nullified by embedded mitigation measures to control pollution risk during construction and operation, there remains a greater risk of pollution events in combination with the Grendon Lakes BESS facility (Project 1), both during construction and operation. The potential severity of pollution events is low during construction but high in the event of a battery fire, although the likelihood of such an event is low.

6.6.46 The Scheme will also result in the net loss of available open field habitat for mobile wading birds (golden plover and lapwing) associated with the SPA. However, all Functionally Linked Land (FLL), determined through survey to be of importance to these species, has been mitigated by the Scheme.

6.6.47 In terms of non-statutory designated sites, Earls Barton Meadow LWS lies within the Cable Route Corridor, and Bozeat Verge PWV, Easton Maudit PWV and Grendon Verge PWV also lie within the Order Limits. Impacts on Earls Barton meadow LWS will be avoided or mitigated during the laying of the cable. No direct impacts to the PWVs are anticipated, and indirect impacts can be mitigated through embedded mitigation measures detailed in the OEPMS **[EX6/GH7.5_D].** Operationally, no impacts on these sites are anticipated. These sites all lie distantly from other projects, and thus there is no potential for cumulative effects.

6.6.48 A significant beneficial effect is predicted at a Local to District level from the greatly increased extent and quality of grassland habitats provided by the

Scheme, in combination with cessation of agriculture and thereby reduced degradation of grassland habitats. Given this, no cumulative adverse effects are possible as a result of other projects.

6.6.49 No loss of woodland will occur as part of the Scheme, and all potential impacts from construction, such as pollution, will be avoided through embedded mitigation measures.

6.6.50 Potential adverse impacts on hedgerows during construction, such as pollution, will be avoided through embedded mitigation measures. Some hedgerow loss will occur during construction, although a significant net gain in extent of hedgerow will be achieved by the Scheme.

6.6.51 No ponds will be lost as a result of the Scheme, and potential impacts from construction, such as pollution, will be avoided through embedded mitigation measures.

6.6.52 Potential adverse effects on watercourses during construction will be reduced to non-significant levels. Operationally, adverse impacts will be avoided by embedded mitigation.

6.6.53 In terms of paragraph 5.4.49 of EN-1 (2023), the Applicant confirms and demonstrates by way of the HRA **[REP5-079]** that there is no likely significant effect on any European protected site (or other site which benefits from the same protection). Equally there are no effects anticipated on any SSSIs nor are there any within 2km of the Order Limits, which were scoped out of the assessment in ES; Volume 1, Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** given the distance from the Order Limits.

6.6.54 Paragraph 5.4.52 of EN-1 (2023) requires the SoS to give due consideration to local designations but recognises that "given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent". Further, and in reference to 5.4.53 and 5.4.55, the Scheme does not result in the loss of any irreplaceable habitats nor does it result in any residual adverse impacts on any species and habitats. Accordingly, the SoS should grant consent on this basis.

6.6.55 In addition to the compliance with the relevant NPS tests, set out above, the embedded mitigation measures proposed are wide ranging and respond directly to the type of species and habitats that exist on Site. The ES concludes that with mitigation, the Scheme is expected to have an overall significant beneficial impact as a result of measures being applied to key receptors.

6.7 Hydrology, Flood Risk and Drainage

6.7.1 This section considers potential impacts of the Scheme in the context of planning policies relating to hydrology, flood risk and drainage.

6.7.2 EN-1 (2023) paragraph 5.8.13 requires Site-specific flood risk assessments (FRA) for all energy projects located in Flood Zones 2 and 3 in England. For projects located in Flood Zone 1, an assessment is required for all proposals that a located on sites of 1 ha or more, that are located on land identified as having

critical drainage problems or as being as increased flood risk in the future, or that are located on site subject to other sources of flooding.

6.7.3 EN-1 (2023) paragraph 5.8.36 sets out relevant factors for determining applications. These include: provision of an appropriate FRA, application of the Sequential Test, compliance with national and local flood risk management strategies, use of sustainable drainage systems (SuDS) where appropriate, design that allows the scheme to remain safe and operational during its lifetime, without increasing flood risk elsewhere, inclusion of safe access and escape routes. Paragraphs 5.8.9 to 5.8.12 and 5.8.21 to 5.8.23 of EN-1 provide guidance on the Sequential Test and, if required, the Exception Test.

6.7.4 In relation to solar developments, EN-3 (2023) paragraph 2.4.11 states that they "*may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to:*

- *increased risk of flooding; and*
- *impact of higher temperatures*."

6.7.5 Paragraph 2.10.16 of EN-3 (November 2023) indicates that "*Associated infrastructure may also be proposed and may be treated, on a case by case basis, as associated development, such as energy storage, electrolysers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance)*."

6.7.6 Paragraph 2.10.60 of EN-3 (November 2023) states that "*As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk*."

6.7.7 Paragraph 2.10.84 of EN-3 (November 2023) requires that a Flood Risk Assessment (FRA) be submitted where it has been carried. Paragraphs 2.10.85 to 2.10.88 set out how drainage impacts can be reduced and mitigated.

6.7.8 Paragraph 2.3.2 of EN-5 (November 2023) requires information on resilience of infrastructure to flooding, including as a result of climate change.

6.7.9 ES Chapter 10: Hydrology, Flood Risk and Drainage **[EX6/GH6.2.10_C]** assess the impact of the Scheme in respect to the hydrological impacts of the Scheme. ES Appendices 10.1 to 10.10 **[REP5-021 to APP-102, APP104 to APP107, REP5-029, REP5-031]** provide a Flood Risk Assessment for the Scheme as a whole and for each of the Sites.

6.7.10 The baseline assessment identifies that the Sites included within the Scheme are mostly located in Flood Zone 1, which represents areas with a low probability of flooding, according to the Environment Agency's Flood Map for Planning. However, some areas that bisect or border the Sites are located within Flood Zone 2 and Flood Zone 3, which represent medium and high probability flood zones. Following further assessment, the Scheme is found to be largely at negligible to low risk of flooding from rivers. Where a higher risk has been identified, such as at the Green Hill BESS Site, flood modelling has confirmed

that the areas identified for development are either located outside of the floodplain or are predicted to experience shallow flood depths of less than 0.3 metres.

6.7.11 The baseline assessment has also considered the risk of surface water flooding across the site. In most cases, this type of flooding is linked to land drains and watercourses that are present within or near the Sites and is therefore considered to form part of the wider fluvial flood risk.

6.7.12 All other potential sources of flood risk, including groundwater, artificial drainage infrastructure, canals and reservoirs, have been assessed separately through Site-specific Flood Risk Assessments and Drainage Strategies for each Site.

6.7.13 A range of embedded and additional mitigation measures have been incorporated into the design of the Scheme to manage flood risk and water quality during construction, operation and decommissioning.

6.7.14 Embedded mitigation measures include:

- Locating key infrastructure, such as substations and battery energy storage units, outside flood risk areas where possible. Where this is not achievable, units will be raised above ground level to reduce flood risk;
- Elevating all solar panels on frames, allowing water to flow freely beneath them during flood events and avoiding displacement of floodplain storage;
- 8m buffers have been established around all watercourses, including Main Rivers and Ordinary Watercourses; and
- Ensuring surface water runoff is managed on site to match natural (greenfield) conditions.

6.7.15 Potential risks from the Scheme have been assessed for all phases. However, with all proposed mitigation measures in place, none of these effects are expected to remain significant during the lifetime of the Scheme.

6.7.16 During construction, there is potential for mud and debris to enter local drainage systems, especially during periods of rainfall. The use of temporary hardstanding and movement of construction vehicles may cause surface water to flow more quickly across the site and increase the risk of local flooding. There is also a risk that silty water or accidental spills of oil, fuel or chemicals could pollute nearby watercourses or soak into the ground.

6.7.17 Without mitigation, these effects could be moderate to major in scale and would be considered significant. However, a range of control measures will be in place. These include silt fencing, bunds, temporary drainage systems, safe storage of fuels and materials, and the use of sealed tanks for all welfare facilities. These measures will reduce the potential for pollution and control surface water runoff. After mitigation is applied, no significant effects are expected.

6.7.18 Once operational, the Scheme will include permanent drainage systems that will manage rainwater from solar panels and infrastructure areas. Runoff will be controlled to match natural greenfield rates using a combination of gravel surfacing, lined storage layers, and flow control devices. Although small areas of

hard surfacing will be introduced at battery storage and substation locations, they will be managed effectively within the drainage system.

6.7.19 Where development takes place within the floodplain, the amount of floodwater displaced has been assessed and found to be extremely small. The increase in flood depth is less than one millimetre and will not affect flood risk elsewhere. Firewater and other surface water pollution risks will be managed through the use of impermeable liners, containment systems and isolation valves that close automatically in the event of a fire. With these measures in place, all potential effects on flood risk and water quality are considered to be not significant.

6.7.20 When the development is removed, the site will be restored to its former condition. During this phase, there may be similar temporary risks to those identified for the construction phase, including increased runoff and the potential for silt or spills to reach watercourses. These will be managed using the same good practice measures, and no significant effects are expected.

6.7.21 Provided that all the mitigation measures are implemented for all schemes, then the cumulative impacts from the Scheme and any cumulative schemes are not anticipated to produce any significant effects.

Sequential Test and Exception Test

6.7.22 As the Scheme is major development and parts of it are within Flood Zones 2 and 3, a Sequential Test is required by EN-1 (2023) and PPG. This has been carried out and reported in **Appendix C** of this document. The Sequential Test showed that there are no reasonably available, lower-risk sites, suitable for the Scheme. As the Scheme is essential infrastructure within Flood Zone 3, an Exception Test is also required. As set out in **Appendix C**, the Scheme fulfils both elements of the Exception Test.

Summary

6.7.23 As set out above, the Scheme is in compliance with the key requirements in EN-1 (2023) in relation to flood risk. The design and layout of the Scheme has mitigated potential impacts on flooding and avoids increasing risk of flooding elsewhere. Where possible, development has been located in areas of low flood risk. The Scheme has met the requirements of the Sequential Test and of the Exception Test.

6.8 Mineral Safeguarding

6.8.1 ES Chapter 11: Minerals **[APP-048]** provide the findings concerning the potential mineral resource impacts of the Scheme during the construction, operation and maintenance, and decommissioning phases.

6.8.2 Chapter 11 sets out the main policy context for safeguarding minerals at a national (NPPF) and local level (Minerals and Waste Local Plans). However, there is no specific reference to mineral safeguarding within national policy statements EN-1 and EN-3 (2023).

6.8.3 The relevant information development plan used for the assessment are as follows:

- BGS in their Mineral Resource Reports for Northamptonshire (Ref.72) and Buckinghamshire and Milton Keynes (Ref.73);
- Northamptonshire Minerals and Waste Local Plan 2017 (NM&WLP) (Ref.34); and
- Milton Keynes Minerals Local Plan 2017 (MKLP) (Ref.36).

6.8.4 It is identified that the Scheme potentially impacts a sand and gravel allocation known as M2: Strixton - Bozeat 1.5 million tonnes (approximately) as well as two existing quarry areas and the Mineral Consultation Areas (MSCs) associated with existing quarries and allocations.

6.8.5 The Scheme also extends into safeguarded mineral areas. NM&WLP paragraphs 6.85 to 6.99 address the impact other forms of development may have for minerals development, through either surface development sterilising mineral resources or encroachment of incompatible development affecting the operational viability. The NM&WLP makes provision to ensure mineral resources of economic importance are safeguarded using Mineral Safeguarding Areas (MSA) and MSCs.

6.8.6 Policy 28 states:

"*Mineral resources of economic importance will be safeguarded from sterilisation by Incompatible non-mineral development through the designation of Minerals Safeguarding Areas*".

6.8.7 MKMLP Policy 18 Minerals Safeguarding and Consultation Areas Infrastructure, states:

"Mineral resources of local and national importance within Milton Keynes include sand and gravel and the White and Blisworth Limestone formations. These resources will be safeguarded from unnecessary sterilisation by other development through the designation of Mineral Safeguarding Areas".

6.8.8 The Scheme comprises of nine sites (the Sites) described as Green Hill A, A.2, B, C, D, E, F, G and Green Hill BESS which accommodate the ground mounted solar photovoltaic generating station and associated development. ES Chapter 3: The Development Site **[REP1-029]** provides a description of the existing conditions within and surrounding the Order Limits. ES Chapter 4: Scheme Description **[EX6/GH6.2.4_B]** provides a description of the proposed Scheme including the physical characteristics and key activities.

6.8.9 The National Planning Policy Framework (Ref.17) requires MPAs to define MSAs to protect known locations of specific minerals from sterilisation. MPAs must also define MCAs based on the safeguarding areas. In this case MSA and MCAs have been defined through the NM&WLP and MKMLP to protect mineral resources. The Scheme lies within a number of MSAs identified to protect sand and gravel and limestone resources.

6.8.10 An assessment of the impact and effects of each site against the relevant policy context is set out below:

Green Hill A, Green Hill A.2 and Green Hill B

6.8.11 The majority of both Green Hill A and A.2 together with the Cable Route Corridor connecting the two are within MSAs protecting sand and gravel resources. These are quite extensive deposits that potentially could be of economic interest being relatively unconstrained by surface development and in the case of Green Hill A.2 have a potentially suitable road access (the A43) to accommodate mineral related traffic.

6.8.12 Green Hill B is also within 2 MSAs protecting sand and gravel resources, however in this case the area of the MSAs affected is more peripheral, with the MSAs extending beyond the Site, to the north and west and southwest. The first part of Cable Route Corridor connecting Green Hill B to the other sites is also within an MSA. There is no apparent evidence to suggest there has been any significant recent or historic sand and gravel extraction within or in the vicinity of these sites nor the relevant section of the Cable Route Corridor. None are allocated for mineral extraction in the NM&WLP nor have been put forward for extraction. The three sites all lie outside the area of focus for future mineral extraction identified in the NM&WLP spatial strategy.

6.8.13 In terms of the Cable Route Corridor, the installation of cables has the potential to constrain future mineral extraction by bisecting mineral deposits and requiring stand-off areas either side thus creating operational issues for future mineral operations and restricting the most effective exploitation of the resource. In this case the embedded mitigation of, wherever possible and subject to other constraints, locating cable routes the edges of significant landscape features including hedges and woods means the impact is minimised.

6.8.14 However, the degree of impact is considered to be low and the significance of effect is considered to be minor effect.

Green Hill C, Green Hill D and Green Hill E

6.8.15 Green Hill C, D and E plus the connecting Cable Route Corridor linking Green Hill A.2, C, D and E do not affect any safeguarded mineral resources.

6.8.16 The magnitude of impact of Green Hill C, D and E plus the connecting Cable Route Corridors linking Green Hill A.2, C, D and E is considered to be negligible and therefore the significance of effect is negligible (not significant for the purposes of the assessment).

Green Hill BESS

6.8.17 The Green Hill BESS lies within the safeguarded Nene Valley deposits; however, it is not specifically allocated for future mineral extraction. Part of Green Hill BESS site to the northwest has recently been dug for sand and gravel, and since the mineral deposit has been removed, it is excluded from the MSA. There is also evidence to suggest the northern fringe of Green Hill BESS site has also been the subject of historic mineral extraction. The remainder of this Site is already heavily constrained by built development not least the existing Grendon Substation and thus the area of mineral deposits affected by the Scheme is relatively limited. Prior extraction of undeveloped parts of Green Hill BESS, to secure these mineral deposits is not considered to be a practical option given the

relatively small and irregular shaped area, the potential amenity, ecological and access constraints that further restrict the area available and the fact the landform post extraction could become susceptible to flooding. The mineral reserves within Green Hill BESS would effectively be temporarily sterilised for the life of the Scheme, however this is not considered to represent a significant impact on mineral resources.

6.8.18 The magnitude of the impact is considered to be low and the significance of effect is considered to be minor effect (not significant for the purposes of the assessment).

Green Hill F

6.8.19 The northern part of Green Hill F is also within a sand and gravel MSA. This is also an area of proven economic sand and gravel deposits demonstrated by the recent extraction of now closed Bozeat Quarry. Green Hill F abuts the former quarry site on 3 sides. In addition, the NM&WLP allocates a new area for sand and gravel extraction under Policy 4 Site M2: Strixton – Bozeat, which abuts Green Hill F to the north. Although this mineral site has not been the subject of a planning application, the NM&WLP makes it clear that future mineral extraction in this location is dependent upon utilising the existing vehicular access connecting it to the existing A509 junction which was constructed to the serve the previous workings. This access road lies within Green Hill F.

6.8.20 Green Hill F has the potential to affect future mineral supply by directly abutting the allocation Site M2. On this basis, the Scheme has been designed to retain at least a 30 metre separation between the allocation boundary and the nearest solar panel.

6.8.21 The Cable Route Corridor running to the west of Green Hill F connecting two parts of the site lies outside any safeguarded mineral deposits although there is an MSA to the west within 160m of the Cable Route Corridor and thus within the study area. The Cable Route Corridor is not considered to have any impact on these safeguarded mineral resources.

6.8.22 The magnitude of the impact of Green Hill F on mineral resources is considered to be low thus for safeguarded mineral deposits and the significance of effect is considered to be minor effect (not significant for the purposes of the assessment).

6.8.23 Taking account of the embedded mitigation and the significance of effect on the allocated mineral deposit to the north east of the site is considered to be minor (not significant for the purposes of the assessment).

Green Hill G

6.8.24 Green Hill G covers a narrow area of safeguarded sand and gravel in the southern western corner. Although part of a much larger MSA, within Green Hill G the potential exploitation of this reserve is already constrained by the A428 to the south and A509 to the west leaving the available deposit as a thin isolated strip which is unlikely to be of any practical economic value.

6.8.25 Green Hill G is also with a MSA protecting limestone deposits, this affects the southern fringe of the site adjacent to the A428 and the southeastern corner. This

is the northern edge of the MSA which covers a large area that extends well to the south of the Green Hill G. Being on the periphery of the identified mineral deposit, the mineral contained within Green Hill G is likely to be a thinner and of poorer quality than elsewhere. There are extensive deposits of limestone elsewhere within Milton Keynes.

6.8.26 In the case of the development of Green Hill G, the Scheme would inhibit exploitation of these mineral resources for the life of the Scheme. The impact is not considered significant as the safeguarded sand and gravel deposits lie outside the preferred areas for extraction of sand and gravel resources within Milton Keynes identified in the MKMLP.

6.8.27 The magnitude of the impact of Green Hill G on mineral resources is considered to be low and the significance of the effect is considered to be minor effect (not significant for the purposes of the assessment).

6.8.28 The magnitude of the impact of the Cable Route Corridors connecting Green Hill G to Green Hill F to the BESS is considered to be low and therefore the significance of effect is Minor (not significant for the purposes of the assessment).

Summary

6.8.29 The Statement of Need **[APP-556]** accompanying the DCO Application sets out a detailed case for why the Scheme is urgently required, concluding that it will be a critical part of the UK's portfolio of renewable energy generation, and required to decarbonise its energy supply quickly and provide secure and affordable energy supplies.

6.8.30 As outlined above, the Scheme is anticipated to be decommissioned after 60 years, and any impacts caused by the Scheme related to land use are considered reversible and temporary. The minerals within the Order Limits will not be permanently sterilised, and post decommissioning, the land could be worked for minerals.

6.8.31 This would involve the removal of all of the Solar PV infrastructure, including the Ground Mounted Solar PV Generating Stations, Collector Compounds, Substations, BESS and ancillary infrastructure, including any on-site compounds. All concrete, hardstanding areas, foundations for the infrastructure and any internal tracks will be removed to a depth of up to 1m. All the below ground cables will be left in situ.

6.8.32 This decommissioning will include removing any permissive paths and the land will be returned to the landowner. Landscape structural planting, including tree planting, hedgerows, scrub, etc., created to deliver biodiversity mitigation and enhancement associated with the Scheme would be left in situ when the Site is handed back to landowners.

6.8.33 Therefore, the landowner has the right to use their land as they would now and any minerals would not be permanently sterilised and would be available to exploit if required at a future date. The minerals within the Order limits will not be permanently sterilised, and post-decommissioning, the land could be worked for

minerals. The Scheme is reservable by nature, and therefore there is not considered to be any conflict with the mineral safeguarding policies.

6.8.34 The DCO Application demonstrates an overwhelming need for this Scheme and that the development could not reasonably be sited elsewhere, in line with paragraph 5.11.19 of EN-1 (2023), the requirements of Policies 1, 4 and 28 of the Northamptonshire Minerals and Waste Local Plan 2017 and policy 18 of the Milton Keynes Minerals Local Plan 2017.

6.8.35 In light of the above, it is considered that the Scheme is in accordance with the NPS, NPPF and Local Mineral planning policies.

6.9 Cultural Heritage

6.9.1 This section considers potential impacts of the Scheme in the context of planning policies relating to cultural heritage.

6.9.2 Section 5.9 of EN-1 (2023) sets out how the impacts of energy infrastructure development on the historic environment should be mitigated and assessed.

6.9.3 EN-1 (2023) paragraph 5.9.9 states that assessments "*should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project*."

6.9.4 Paragraph 5.9.13 encourages the applicant to identify any opportunities to enhance the historic environment, including through design that enhances the setting of assets, through archival recording, and through improving access to and appreciation of assets.

6.9.5 In relation to solar PV developments, EN-3 (2023) paragraphs 2.10.107 to 2.10.117 provide further guidance on likely impacts, on assessment approaches and on potential positive effects. Applicants are advised to take into account the results of heritage assessments in scheme design.

6.9.6 NPPF Paragraphs 212-214 consider the impact of development proposals upon the significance of designated heritage assets.

6.9.7 North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (Ref.29), West Northamptonshire Joint Core Strategy Local Plan (Ref.31) (Adopted December 2014), and Milton Keynes Council Core Strategy (Adopted 2019) (Ref.35) each seek to protect, preserve and enhance historic assets

6.9.8 ES Chapter 12: Cultural Heritage **[APP-049]** assess the impact of the Scheme on cultural heritage. A Heritage Statement is provided in Appendix 12.5 of the ES **[APP-139 to APP-145]**.

6.9.9 There are no designated or non-designated heritage assets within the Order Limits. Within the wider area, the following heritage assets have been scoped into the assessment: 4 Conservation Areas, 69 Listed Buildings, one Registered

Parks and Garden, one Scheduled Monument, and 24 non-designated heritage assets.

6.9.10 Within each of the 9 Sites and within the Cable Route Corridor, non-designated archaeological assets and historic landscape character units have been identified.

6.9.11 For potential setting impacts embedded mitigation measures have been identified including 'no development' areas, offset, panel free buffer zones, and landscape mitigation measures aimed at screening heritage assets from the Scheme using hedgerow enhancements, planting of shelter belts and trees.

6.9.12 Where direct impacts have been identified as a result of vibration impacts from construction traffic an archaeological condition survey has been agreed as appropriate additional mitigation.

6.9.13 An Archaeological Mitigation Strategy **[CR2-006]** details the mitigation measures to safeguard or record archaeological sites that could be impacted by the Scheme. Embedded mitigation is aimed at preserving archaeological assets 'in situ' in the form of 'no development' area and concrete feet. Additional mitigation measures will preserve archaeological assets 'by record' in the form of strip, map and sample excavation and archaeological monitoring.

6.9.14 Construction and operational phase management plans **[EX6/GH7.1_C]** and **[EX6/GH7.2_D]** will be used to ensure any identified impacts to heritage or archaeological assets will be safeguarded during the construction and operational phases, including from the potential for direct impacts to heritage assets relating to vehicle movements, which would be long-term and irreversible.

6.9.15 There are eight archaeological assets where there is the potential for significant effects to occur as a result of construction impacts caused by the Scheme (Moderate to Moderate to Major adverse). Following the implementation of the additional mitigation outlined in the Archaeological Mitigation Strategy **[CR2-006]**, residual effects to these assets would be reduced to negligible adverse, which is not significant.

6.9.16 Where above ground infrastructure has been identified as causing an impact to the settings of heritage assets, this impact would begin at the construction phase and continue for the duration of the operation phase. Once the Scheme has been decommissioned, land would revert to baseline conditions (or as close to as reasonably possible), and any temporary impacts to setting would be reversed.

6.9.17 There are two Conservation Areas where there is the potential for significant effects (moderate adverse) to occur as a result of impacts to their setting, following mitigation:

- Mears Asby Conservation Area; and
- Easton Maudit Conservation Area.

6.9.18 There are two Listed Buildings with where there is the potential for significant effects (moderate adverse) to occur as a result of impacts to their setting, following mitigation:

- Grade I Listed Church of St Peter and St Paul (NHLE 1189610); and
- Grade II* Listed 22 High Street (NHLE 1040784).

6.9.19 It is considered that potential impacts during the decommissioning phase will be of the same magnitude as those that occurred during the construction phase and would be temporary in nature.

Summary

6.9.20 In summary following an assessment of the designated and non-designated heritage assets in accordance with the requirements in EN-1 (2023) paragraph 5.9.9, EN-5 (2023) paragraph 2.10.107 and Chapter 16 of the NPPF, ES 12: Cultural Heritage **[APP-049]** finds that the impacts of the Scheme on identified heritage assets are not significant in EIA terms subject to the implementation of embedded mitigation measures. There will be no significant impact on cultural heritage. The Scheme is, therefore, considered to meet the requirements of EN-1 and EN-3 (2023).

6.10 Transport and Access

6.10.1 This section considers potential impacts of the Scheme in the context of planning policies relating to transport and access.

6.10.2 Section 5.14 of EN-1 (2023) (Ref.1) outlines matters relating to traffic and transport and confirms in paragraph 5.14.5 that "*if a project is likely to have significant transport implications, the applicant's ES should include a transport appraisal"*. It confirms in paragraph 5.14.1 that *"all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion. Impacts may include economic, social and environmental effects".*

6.10.3 The requirement to consult with relevant highway authorities is set out in paragraph 5.14.6. Paragraph 5.14.7 of EN-1 (2023) sets out a clear approach towards mitigation of transport impacts, with a Travel Plan being prepared to include demand management and monitoring measures. Details of measures to improve access by active, public and shared transport should be provided as well as demand management measures.

6.10.4 Specific reference is made within EN-1 (2023) to undertaking the appraisal of the construction and operational stages with specific reference in paragraph 5.14.13 to HGV movements. Paragraph 5.14.14 goes on to state that schemes with substantial HGV traffic should control HGV movements to specific periods and routes, provide sufficient parking and arrangements for abnormal loads. Paragraph 5.4.15 gives regard to the cost effectiveness of demand management measures compared to new transport infrastructure.

6.10.5 Paragraph 5.14.21 of EN-1 (2023) concludes that "*The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision*".

6.10.6 ES Chapter 13: Traffic and Access **[REP2-003]** assess the impact of the Scheme on transport and access. A Transport Assessment is provided in Appendix 13.2 of the ES **[REP3-036 to REP3-041]**.

6.10.7 The nature of the Scheme is such that the greatest impact is likely to occur during the construction and decommissioning phases. It is not anticipated that the effects associated with decommissioning will be worse than during the construction phase.

6.10.8 The Sites and Cable Route Corridor locations were grouped across common access routes to ensure vehicle movements and their effects were assessed. On a peak construction day, there could be up to 5 to 9 arrivals by HGV, spread across the Scheme. In addition, the Transport and Access assessment is based on their being 1,011 construction workers at any one time. A large proportion of construction workers will arrive by shuttle bus or will share vehicles in order to reduce the number of vehicle trips on the highway network. There will also be a small number of HGV and construction worker movements associated with the Cable Route Corridor.

6.10.9 Embedded mitigation measures will be implemented during the construction period. An Outline Construction Traffic Management Plan (OTMP) **[EX6/GH7.9_C]** has been prepared. The document provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the highway network are minimised.

6.10.10 The construction period will include the use of HGVs to deliver equipment and materials. This will be strictly managed to ensure that vehicle movement is controlled, uses specific identified routes, occurs outside of peak highway periods and movements are kept to a minimum.

6.10.11 On a day-to-day basis, the largest vehicle that will be used to deliver equipment to the Site will be a 16.5m articulated vehicle, although a significant proportion of HGV movements will be by smaller vehicles. There will also be a small number of abnormal load movements to transport transformers and routes have been assessed for these movements.

6.10.12 An Outline Public Rights of Way and Permissive Paths Management Plan **[EX6/GH7.10_C]** has been prepared. This will manage movements during the construction period across the Cable Route Corridor during periods where vehicles must pass. Whilst the design of the Sites seeks to avoid crossing PRoWs wherever possible, Green Hill F and Green Hill G contain several PRoWs where management will be required. The Outline Public Rights of Way and Permissive Paths Management Plan (OPROWMP) **[EX6/GH7.10_C]** covers Permissive Paths that are proposed and identified the longer-term management across the operation and decommission phases.

6.10.13 The likely effects of vehicle movements have been assessed. During the construction phase, the assessment concludes that the likely effects of the Scheme on the above criteria will either be negligible or minor adverse in nature and not significant. The construction phase would not have a significant adverse effect on any of part of the Study Area.

6.10.14 During the operation phase, traffic associated with the operation and maintenance phase (including replacement of equipment) is considered to be lower than that associated with the construction phase. The effects of the Scheme during the operation and maintenance phase will be lower or no worse than the construction phase.

6.10.15 The Scheme is anticipated to have a design life of approximately 60 years. At the end of the Scheme's operational life, it will be decommissioned. Traffic associated with the decommissioning phase is considered to be lower than that associated with the construction phase. The effects of the Scheme during the decommissioning phase will be lower or no worse than the construction phase.

Summary

6.10.16 In summary, following an appraisal in accordance with EN-1 (2023) paragraph 5.14.5, EN-3 (2023) paragraph 2.10.139 and Chapter 9 of the NPPF, ES Chapter 13: Traffic and Access **[REP2-003]** finds that the transport and access impacts of the Scheme are not significant in EIA terms. There will be no unacceptable impact on transport infrastructure. The Scheme is, therefore, considered to meet the requirements of EN-1 and EN-3 (2023).

6.11 Noise and Vibration

6.11.1 This section considers potential impacts of the Scheme in the context of planning policies relating to noise and vibration.

6.11.2 EN-1 (November 2023) paragraph 5.12.6 requires a noise assessment to be prepared where noise and vibration impacts are likely to arise and sets out the methodology for this assessment. EN-3 (November 2023) paragraphs 2.10.120 to 2.10.126 set out that the noise and vibration impact of construction traffic should also be considered. EN-1 paragraph 5.12.9 adds that for operational noise with respect to human receptors should be assessed using the principles of the relevant British Standards and other guidance.

6.11.3 EN-1 (November 2023) paragraph 5.12.17 states that the decision maker should not grant development consent unless it is satisfied that the proposals will meet the following aims:

- avoid significant adverse impacts on health and quality of life from noise;
- mitigate and minimise other adverse impacts on health and quality of life from noise; and
- where possible, contribute to improvements to health and quality of life through the effective management and control of noise.

6.11.4 NPS for Energy EN-3 (November 2023) does not have a specific section for noise generated by the continued operation of solar projects, however noise and vibration generated by the construction (including traffic and transport) is covered in Section 2.10.131, which allows for controls on vehicle movements.

6.11.5 NPS for Energy EN-5 (November 2023) Section 2.9 sets out how noise from electrical equipment should be assessed and mitigated.

6.11.6 Part (e) of NPPF paragraph 187 outlines that planning decisions should prevent "new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of…noise pollution". At paragraph 198 part (a) it also states that decisions should "mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life".

6.11.7 ES Chapter 14: Noise and Vibration **[APP-051]** assess the impact of the Scheme in respect to noise and vibration of the construction, operation, and decommissioning stages.

6.11.8 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 site and nearby existing sensitive receptors, of each of the Sites. 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 dominant existing noise sources are from road traffic noise.

6.11.9 The design of the Scheme incorporates mitigation measures.

6.11.10 The Outline Construction Environmental Management Plan (OCEMP) **[EX6/GH7.1_C]** includes best practicable means (BPM) and good practice measures for management of noise, to be used during the construction phase of the Scheme such as maintenance of equipment and controls on construction traffic.

6.11.11 Decommissioning mitigation measures will be the same as construction mitigation measures with similar good practices measures outlined in the Outline Decommissioning Statement (ODS) **[EX6/GH7.3_C]**.

6.11.12 An Outline Operational Environmental Management Plan (OOEMP) **[EX6/GH7.2_D]** will be used during the operational stage of the Scheme such as selection of quieter equipment, appropriate training, and Best Practicable Means (BPMs), where possible.

6.11.13 For the construction phase, the assessment has taken into account primary noise-generating activities including site preparation using excavators and dozers; installation of solar PV panels using piling rigs and excavators; trenching of the cable route using excavators. Following mitigation and based on the distances from sensitive receptors all noise and vibration effects during construction were assessed as not significant.

6.11.14 During the operational phase, noise levels from the Scheme are predicted to be slightly above the existing background noise levels. Impacts will be negligible and operational effects are considered to be not significant. This includes effects from the replacement of batteries and panels.

6.11.15 It is assumed that the noise and vibration effects during decommissioning will be similar to the construction phase.

Summary

6.11.16 In summary, following an appraisal in accordance with EN-1 (2023) paragraph 5.14.5, EN-3 (2023) paragraph 2.10.139 and Chapter 9 of the NPPF, ES Chapter 13: Traffic and Access **[REP2-003]** finds that the transport and access impacts of the Scheme are not significant in EIA terms. There will be no unacceptable impact on transport infrastructure. The Scheme is, therefore, considered to meet the requirements of EN-1 and EN-3.

6.12 Glint and Glare

6.12.1 EN-3 (November 2023) paragraph 2.10.103, states that, in some instances, it may be necessary to seek a glint and glare assessment as part of the application. This may need to account for 'tracking' panels if they are proposed as these may cause different diurnal and/or seasonal impacts. Paragraph 2.10.158 of EN-3 sets out that solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact on nearby homes and motorists.

6.12.2 EN-3 (November 2023) paragraph 2.10.159 also states: "*Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms*."

6.12.3 Policy Site 9 of the WLP (Sywell Aerodrome) state that the Council will seek to resist development within the vicinity of the aerodrome, if such development would prejudice aviation use on the site. WNJCS Policy S11, DLP ENV9 and MKLP Policy SC3 also seek to protect residential and visual amenity in respect of renewable energy projects.

6.12.4 EMKLP Policy CEA6 states that renewable energy will be supported unless there would be: "*unacceptable harm on air safety from radar interference and an increased risk in incidents on approaches/departures from local airfields/airports*."

6.12.5 NNJCS Policy 26 is relevant to all types of renewable energy proposal and requires shadow flicker to be considered. This is considered to be relevant to wind farm proposals where the blades can cause flicker as they rotate but is not considered to be relevant to the Scheme as the panels do not cause flicker. Glint and glare matters associated with the tilting of tracker panels are however considered within ES Chapter 15: Glint and Glare **[APP-052]**.

6.12.6 ES Chapter 15: Glint and Glare **[APP-052]** considers the glint and glare impacts of the Scheme. The Scheme is located in a rural area and the review of available imagery shows no presence of other solar farms of a similar size.

6.12.7 The most reflective and visible components of solar development is the upper surface of the solar panel. Although the Glint and Glare chapter concludes that while the panels' frames and structures can be a source of glare, it is unlikely that they will be visible, and their totally reflective surface is much smaller when compared with the total panel area.

6.12.8 Other components, such as the substation or inverters are not a source of solar reflections due to their lack of reflective materials, and the cables that export the electricity generated by the Scheme are buried underground and therefore, do not require to be considered in the Glint and Glare Assessment. In addition, no solar panels are to be installed on Green Hill BESS, and, as such, no sources of glint and glare are expected.

6.12.9 Taking all factors into account, the glint and glare effects can occur from any solar panels installed at the Scheme's Sites. The Assessment has only considered the Operational Effects of the development, which represents the worst-case scenario.

6.12.10 Following the findings of the initial impact assessment, a series of embedded mitigation measures have been incorporated to reduce the impacts of the Scheme to acceptable levels. These embedded mitigation options involve instant screening in the form of vegetation and the use of backtracking panels, where applicable, which can be modified to project solar reflections away from receptors.

6.12.11 ES Chapter 15: Glint and Glare **[APP-052]** considered varying receptors ranging from 'low sensitivity' on local roads (because traffic volumes are predicted to be low), to 'medium sensitivity' on regional, national, and major roads (with higher levels of traffic), dwellings and aviation-related receptors.

6.12.12 For dwelling and road receptors where a Moderate Adverse impact was modelled, the Applicant has proposed screening in the form of mature vegetation planting as embedded mitigation. Once the vegetation is in place, the impacts are immediately considered low because it will be planted in a mature state. The screening is shown on the Landscape and Ecology Mitigation and Enhancement Plans **[EX6/GH6.4.4.10_D, EX6/GH6.4.4.11_C, APP-209, REP3-046, APP-211, EX6/GH6.4.4.14_C, EX6/GH6.4.4.15_C, APP-214, APP-215, REP3-052, REP1-113, REP3-054, EX6/GH6.4.4.20_B]**.

6.12.13 Regarding the six considered aviation receptors, four are considered to have low impacts, with no embedded mitigation proposed (Easton Maudit Airstrip, Hold Farm Airstrip, Pitsford Airstrip and Tower Farm Airstrip).

6.12.14 The William Pitt Airstrip, located within 5km of Green Hill A, Green Hill A.2, Green Hill B, Green Hill C, D and E, required further technical modelling. The technical modelling concludes that glare with 'potential for 'temporary afterimage' was predicted towards flight path FP20 from tracking panels within Green Hill E. Therefore, regarding flight path FP20, the proposals have a moderate significant effect with the embedded mitigation.

6.12.15 The Sywell Aerodrome, located within 5km of Green Hill B and Green Hill C, D and E, required further technical modelling. Glare with 'potential for temporary after-image' was predicted towards flight paths FP23 from tracking panels from Green Hill C. Therefore, regarding flight path FP23, the proposals have a moderate significant effect with the embedded mitigation.

6.12.16 In order to understand which additional mitigation options would be most effective at reducing the moderate effects identified to these aviation receptors to a non-

significant level, the Applicant consulted with an Aviation Specialist. Following a review of the modelling results, the Aviation Specialist confirmed that, based on their extensive real-world experience of the effects of solar panels on aviation receptors, the modelled results would not result in a significant impact on the aviation receptors in practice. The recommendation from the Aviation Specialist was that no additional mitigation was required as the modelled effects consistently report significantly greater impacts than occur in practice.

6.12.17 The Aviation Specialist has provided a summary of empirical evidence collected from aerodromes located near to existing solar farms, owners, operators and pilots, demonstrating that modelled impacts from solar farms do not occur in practice, which is provided in Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes **[APP-572]**.

6.12.18 Having sought expert advice from the aviation sector in order to better understand what additional mitigation is required to reduce the identified significant effects to not significant, the Applicant has been advised that the identified effects are, in practice, not significant. On this basis and having been provided with empirical evidence that a range of comparable aerodromes with nearby solar farms have not experienced any significant effects to aviation receptors, no additional mitigation is proposed.

6.12.19 ES Chapter 15: Glint and Glare **[APP-052]** also considered the cumulative effects of the glint and glare arising from other solar schemes, including the Sywell Road Solar Farm, located nearby Green Hill C, Green Hill D and Green Hill E of the Scheme.

6.12.20 The receptor review concluded that the line of sight from the ground-base receptors towards Sywell Road Solar farm will be obstructed by intervening vegetation and terrain. Therefore, the Chapter concludes that there are not considered to be any likely significant cumulative effects in conjunction with this Scheme.

Summary

6.12.21 The glint and glare impacts of the Scheme have been shown not to be significant in EIA terms. There will be a minor effect of glint and glare on residential dwellings with the additional mitigation of matured vegetation on residential amenity and the vegeration will provide instant screening to road users.. In relation to aviation receptors, aviation specialists were engaged to provide professional judgment in interpreting the modelling results in light of the empirical evidence. It is considered that the potential effects of Glint and Glare towards Easton Maudit Airstrip, Hold Farm Airstrip, Pitsford Airstrip, Tower Farm Airstrip, William Pitt Airstrip and Sywell Aerodrome will be minor and not significant and no additional mitigation is required. The Scheme is, therefore, considered to meet the requirements of EN-3 (November 2023) paragraph 2.10.103, Policy Site 9 of the WLP and WNJCS Policy S11, DLP ENV9, MKLP Policy SC3 and EMKLP Policy CEA6.

6.13 Air Quality

6.13.1 Paragraphs 5.2.8 and 5.2.9 of EN-1 (November 2023) states that where a project is likely to have adverse effects on air quality, the Applicant should undertake an

assessment of the impacts of the proposed project as part of the Environmental Statement (ES). In accordance with these policies, the air quality impacts of the Scheme have been assessed within ES Chapter: 16: Air Quality **[APP-053]**.

6.13.2 With regards to the decision-making process, EN-1 (November 2023), paragraph 5.2.17-5.2.19 states that air quality considerations should be given substantial weight where a project would lead to a deterioration in air quality in an area, or lead to a new area where air quality breaches any national air quality limits.

6.13.3 Paragraph 5.2.12 of EN-1 (November 2023) states that where a proposed development is likely to lead to a breach of any relevant air quality limits, objectives or targets, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.

6.13.4 In all cases, the Secretary of State must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits, the Applicant should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed.

6.13.5 NPPF Paragraph 199 states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

6.13.6 NPPF Paragraph 201 states: "*the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively*."

6.13.7 MKLP Policy NE6 and WNJCS Policies S10 and BN9 requires that the impacts of the development are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters, such as noise, dust, odour, shadow flick, air quality and traffic. In addition, MKLP adds that applications should be accompanied by an air quality assessment.

6.13.8 In accordance with Paragraphs 5.2.8 and 5.2.9 of EN-1 (November 2023), effects of the Scheme on air quality, including odour, fumes, smoke, dust and other sources at nearby sensitive receptors during construction, operation and decommissioning phases have been considered within ES Chapter 16: Air Quality **[APP-053]**. The assessment predicts the levels of air quality pollutants and assesses them to determine whether there are any likely significant effects taking account of relevant policy, guidelines and best practice.

6.13.9 Section 16.8 of ES Chapter 16: Air Quality **[APP-053]** identifies and evaluates the likely significant effects of the Scheme and identifies that these are likely to be dust and particulate matter during the construction and decommissioning phase and during the operational phase, the effects of a fire incident on surrounding residents and the public. Following the implementation of the appropriate embedded mitigation measures set out at Section 16.7 of the ES, the

significance of the effects from dust and PM10 emissions associated with the construction works is considered to be negligible on all receptors which is not significant in EIA terms. This assessment is based on Institute of Air Quality Management Guidance. All effects are considered to be temporary, direct, adverse and short-term.

6.13.10 Embedded mitigation measures relating to construction and decommissioning phase, dust and particulate matter are incorporated within the Outline Construction Environmental Management Plan **[EX6/GH7.1_C]** and the Outline Decommissioning Statement **[EX6/GH7.3_C]**. This will be secured through a DCO Requirement. This demonstrates that the importance of air quality considerations in respect of dust has been recognised in developing the Scheme, as required by Paragraphs 5.2.8 and 5.2.9 of EN-1 (2023) and appropriate mitigation measures have been secured in accordance with Paragraph 5.2.10 of EN-1 (November 2023). It also demonstrates that adverse impacts upon air quality during construction and decommissioning phase have been considered and addressed by MKLP Policy NE6. Furthermore, the Scheme accords with MKLP Policy NE6 and WNJCS Policies S10 and BN9 in so far as demonstrating that the dust impacts of the Scheme are acceptable on the amenity of sensitive neighbouring uses (including local residents).

6.13.11 In respect of the effects of a potential fire incident during the operational phase, a 'Battery Energy Storage System (BESS) Fire Emissions Modelling Methodology and Assessment' has been undertaken and is included at Appendix 16.2 of the ES **[APP-167]**. This recommends various measures to be undertaken in the case of a fire, including informing any potential affected residents and advising the public about health effects of smoke related symptoms and ways to reduce exposure.

6.13.12 Following the implementation of these measures during an occurrence of a fire incident, ES Chapter 16: Air Quality **[APP-053]** determines the air quality effects to be negligible, which is not significant in EIA terms. An Outline Battery Storage Safety Management Plan **[REP5-075]** has been produced incorporating these measures and has been submitted with the DCO application. This will be secured through a DCO requirement.

6.13.13 This demonstrates that the importance of air quality considerations in respect of dust has been recognised in developing the Scheme have been recognised in developing the Scheme, as required by Paragraphs 5.2.8 and 5.2.9 of EN-1 (2023) and appropriate mitigation measures have been secured in accordance with Paragraph 5.2.10 of EN-1 (2023). It also demonstrates that adverse impacts upon air quality form potential fire incidents during the operational phase have been considered and addressed by MKLP Policy NE6. Furthermore, the Scheme accords with MKLP Policy NE6 and WNJCS Policies S10 and BN9 in so far as demonstrating that the air quality impacts of the Scheme are acceptable on the amenity of sensitive neighbouring uses (including local residents).

6.13.14 In terms of potential cumulative effects, the potential for cumulative traffic and dust air quality effect have been considered within Section 16.11 of ES Chapter 16: Air Quality **[APP-053]**, there will be no effects from the Scheme that could

combine with effects from other sites and other developments to lead to cumulative effects and are designated as 'not significant' in EIA terms. The Chapter identifies Grendon BESS as the only potential development likely to induce cumulative impacts during construction. However, these are not considered to cause a significant cumulative impact.

6.13.15 Following the implementation of the embedded mitigation measures detailed in Section 16.7 of ES Chapter 16: Air Quality [APP-053], there will be no effects from the Scheme that could combine with effects from other sites and therefore, no in-combination effects are anticipated. In accordance with Paragraph 5.2.12 of EN-1 (2023), appropriate mitigation measures regarding dust have been secured in relation to construction and decommissioning phases and potential BESS fire incidents during the operational phase. Chapter 16: Air Quality of the ES **[APP-053]** confirms that the impact of the Scheme on air quality is 'negligible' and is therefore, not significant in EIA terms. Therefore, no further mitigation is required to ensure the Scheme will not result in any substantial changes in air quality levels as a result of cumulative effects.

Summary

6.13.16 ES Chapter 16: Air Quality **[APP-053]** has assessed the effects of the Scheme upon air quality during construction, operation and decommissioning. The Scheme therefore complies with the requirements of Paragraphs 5.2.8 and 5.2.9 of EN-1 (November 2023).

Embedded mitigation measures have been secured with EN-1 (2023), paragraph 5.2.12 and the conclusions of ES Chapter 16: Air Quality **[APP-053]** are that the air quality effects are anticipated to be negligible, which is not significant in EIA terms. No cumulative effects are anticipated. As required by MKLP Policy NE6 and WNJCS Policies S10 and BN9, the ES Chapter 16: Air Quality **[APP-053]** shows that the impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents). It concludes that the Scheme will not result in adverse impacts upon air quality from odour, fumes, smoke, dust and other sources.

6.14 Socio-economics, Tourism and Recreation

6.14.1 Section 5.13 of EN-1 (November 2023) set out the requirements for the assessment of local and regional socio-economic impact of energy NSIPs. Paragraph 5.13.4 state that the assessment should consider all relevant socio-economic impacts, which may include: the creation of jobs and training opportunities, the provision of additional local services and improvements to local infrastructure; effects on tourism and the impact of a changing influx of works during the different construction, operation and decommissioning phases of the energy infrastructure.

6.14.2 The NPPF (2025) (paragraphs 85, 86, 103 and 105) supports sustainable economic growth; the achievement of healthy, inclusive and safe places; and the protection of existing land uses and community infrastructure, including rights of way.

6.14.3 The relevant local planning policies are set out at paragraphs 17.4.24-17.4.35 of ES Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]**. These cover a range of topics.

6.14.4 NNJCS Policy 25, WNJCS Policy R2 and MKLP Policy ER8 support opportunities to develop and diversify the rural economy provided that they are of an appropriate scale for their location and respect the environmental quality and character of the rural area.

6.14.5 In addition, NNJCS Policy 22 and WNJCS Policy S7 set out job creation targets for Councils to meet during their Plan Periods.

6.14.6 ES Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]**, provides an assessment of socio-economic effects, including upon employment, the local economy, development land, public rights of way, and local amenities and land use in accordance with paragraph 5.13.4 of EN-1 (November 2023). The socio-economics effects of the Scheme are set out in the following sections.

Effects on Employment and the Local Economy

6.14.7 ES Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]** presents the impacts on employment and its effects on the local economy of the Scheme during construction, operation and decommissioning. It identifies that that the Scheme will have significant beneficial effects in terms of access to employment and education during the construction phase of the Scheme. It identifies that the Scheme will support a net 153 FTE employees per annum, within the Study Area, with overall total of 530 FTE. The estimated on-site construction workforce expected to peak at approximately 204 FTE employees, within the Study Area, totalling 1,001 FTE, at the height of the construction period. Of these an upper limit of 75% of the jobs created will be taken up by people within the Study Area (for socio-economic: Bedford Borough Council, Milton Keynes City Council, North Northamptonshire Council and West Northamptonshire Council). As part of this application an Outline Skills Supply Chain and Employment Plan submitted as a supporting document **[APP-552]** As set out in Section 4.6 of this Planning Statement, a local skills and employment plan will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to advertise and promote employment opportunities associated with the Scheme in construction and operation locally.

6.14.8 The annual gross value added (GVA) to the economy of these workers is expected to be £34.8 million, of which £13.8 million GVA per annum will be generated within the Study Area during the Scheme's construction. The operation and maintenance of the Scheme is anticipated to generate a net uplift to GVA of £3.94 million per annum, of which £2.13 million GVA will be generated within the Study Area.

6.14.9 The number of workers for operation and maintenance has been provided by the Applicant based on industry experience and professional judgement. There are approximately eight agricultural sector jobs and 11 tourism and recreational jobs that will remain lost during the Scheme's operational lifetime. There will be a net loss of 12 FTE as a result of the Scheme within the Study Area. However, the actual number of jobs generated by the Scheme may be greater as part-time staff

will be created to ensure the Scheme is operational over a long period. Furthermore, an estimated four FTE will be generated in the Study Area, as a result of indirect or induced employment, such as through supply chains. In addition, as set out in section 4.6 of this Planning Statement, the Applicant will make a skills and education contribution to assist and encourage local people to access apprenticeships and training.

6.14.10 In addition, there will be a significant medium term temporary moderate beneficial effect upon local accommodation sector employment and upon the accommodation stock during the construction period. Accommodation sector employment will also benefit during the decommissioning phase.

6.14.11 Overall, it is considered that the direct and indirect employment creation resulting from the Scheme and gross value added (GVA) to the economy, is in accordance with the NPPF (paragraphs 85, 86, 103 and 105) of the NPPF, which support sustainable economic growth. It also accords with the aims of NNJCS Policy 22 and WNJCS Policy S7 in terms of delivering jobs, economic prosperity and rural economic growth with the Councils respectively. The clear benefits arising from the Scheme in terms of employment generation through the construction, operation and decommissioning of the Scheme, outweigh the impacts of the loss of these energy sector jobs at the end of the Scheme's life.

Effects on Tourism and Recreation

Tourism Attractions

6.14.12 Impacts on tourism attractions have been assessed in Chapter 17 **[APP-054]** during construction, operation and decommissioning. The Scheme's estimated two year construction period is likely to have a degree of impact on tourism attractions in the immediate locality and the Study Area (for tourism and recreation: Bedfordshire, Milton Keynes and Northamptonshire).

6.14.13 Within 2km of the Scheme is the Pitsford Water and Sywell Country Park, which are reservoirs that are used for recreational uses. Castle Ashby House and Gardens is the primary heritage attraction within 2km of the Scheme as well as a number of museums.

6.14.14 During the construction phase, the sensitivity to change on regionally important tourism destinations (Castle Ashby House, Sywell Aviation Museum, Pitsford Water and Sywell Country Park) is medium. The construction is anticipated to have a medium-term temporary moderate-minor adverse effect on the landscape setting of these attractions and also on construction traffic using the access routes to these locations. In terms of localised attractions within the Scheme's 2km Zone of Influence, the worst case scenario for some receptors is a medium-term temporary moderate-minor adverse effect.

6.14.15 Embedded mitigation measures during the construction phase will reduce the level of impact the Scheme has on the visual and landscape setting of local attractions. In addition, embedded transport mitigation measures have been considered to reduce the number of tourism attractions likely to be impacted by construction traffic. With these embedded mitigations in place, the overall level of

effects within the 2km Zone of Influence is likely to be low, resulting in an overall medium-term temporary minor adverse effect during construction.

6.14.16 During the operational phase, the Scheme is not anticipated to directly affect the use, desirability and importance of the regionally important tourism destinations. The greatest level of impacts are likely to be at the Sywell Aviation Museum and Sywell Country Park, due to their proximity to the Scheme and view of the onsite infrastructure on approach routes to these locations. The effect on the landscape setting of these attractions will be mitigated by implementing landscape planting associated with the Scheme.

Public Rights of Way and Long Distance Recreational Routes

6.14.17 As previously discussed, Public Rights of Way cross the Order limits. ES Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]** sets out that the Scheme's construction is likely to have direct impacts on a number of Public Rights of Way and long distance recreational routes as a result of temporary use as construction accesses, any required diversions and closures, and secondary temporary impacts as a result of movement of construction goods and employee vehicles. Embedded mitigation to limit the impacts is set out in the Outline Public Rights of Way and Permissive Paths Management Plan **[EX6/GH7.10_C]**, the OCEMP **[EX6/GH7.1_C]** and OCTMP **[EX6/GH7.9_C].** The residual impacts upon long distance recreational routes are assessed as significant for this temporary period.

6.14.18 The Scheme, through its design and embedded mitigation, which is set out in the Outline Public Right of Way and Permissive Paths Management Plan **[EX6/GH7.10_C]** preserves the routing and access of all the existing PRoWs and permissive recreation routes within the Order Limits throughout the operational lifetime of the Scheme, except during times of infrastructure replacement. In addition, the Outline Landscape and Ecological Management Plan **[EX6/GH7.4_E]** sets out the embedded landscape mitigation that will and establish and mature during the first 15 years of the Scheme's operational lifetime, which will provide long-term visual mitigation for all PRoW users. In conclusion, during its operational lifetime, the Scheme is not anticipated to have a significant effect on the local and wider PRoW network.

Recreational Facilities and Attractions

6.14.19 Waterways and bodies of water used for recreation are not anticipated to be impacted directly by the Scheme during their physical separation from construction works on the Sites, and the use of horizontal directional drilling for crossing major waterways.

6.14.20 Due to their regional significance, the River Nene, White Mills Marina and Pitsford Reservoir are considered to be of medium sensitivity to changes. During construction, road access to the marina is likely to be adversely affected by construction traffic accessing the Green Hill BESS. Therefore, this is up to a medium-term temporary moderate adverse effect, which is significant.

6.14.21 In terms of other recreational facilities and attractions, local important fishing and wild swimming locations at Castle Ashby, Grendon Lakes and Sywell Reservoir

are of low sensitivity. Two of the formal sports grounds (the Northampton Shooting Ground and Wellingborough Old Grammarians Sports Club) are anticipated to experience up to medium temporary moderate adverse effects, which is significant due to construction traffic interrupting the access to these facilities. For equestrian facilities and businesses, it is concluded that these are of medium sensitivity. Therefore, during the construction stage they are anticipated to have a medium-term temporary moderate adverse effect, which is significant.

6.14.22 During the operational lifetime of the Scheme waterways and bodies of water used for recreation are mostly occluded or distant. Sywell Reservoir is likely to have more direct views on the Scheme on approach routes, meaning that it is classified as a long-term minor adverse effect. Embedded mitigation measures to remove array areas and offset from highways contribute towards the reducing the effects.

6.14.23 In terms of formal recreational facilities during the operational phase, the greatest impact is a low magnitude impact to the MK Heli Club in Easton Maudit, due to views of the Scheme on the approach and the views from remote controlled aircraft or drones. However, the result of the Scheme is only likely to have a long-term negligible adverse effect. Embedded mitigation measures to remove array areas and offset from highways contribute towards the reducing the effects.

6.14.24 During its operational lifetime, the Scheme is likely to impact on equestrian facilities by way of views impacting desirability within equestrian facilities but also due to changes in the landscape character of the surrounding areas, particularly from highways and bridleways, which are used as hacking routes. The overall impact on all equestrian facilities is likely to be a long-term minor adverse effect. Additional mitigation measures to reduce the impact include improved access to the countryside through enhanced permissive access routes.

Summary

6.14.25 There are significant beneficial socio-economic effects of the Scheme as a result of the employment and education opportunities created during construction and decommissioning. In addition, there will be benefits to the use of accommodation stock during construction. The assessment of tourism impacts identifies that there is a peak medium-term temporary moderate adverse effect to tourism attractions, public rights of way and equestrian facilities.

6.14.26 During the operational phase, the regional tourist attractions are considered to be of medium sensitivity and peak long-term moderate-minor adverse effect with the embedded mitigation. In addition, long distance recreational routes are considered to be of high sensitivity have peak long-term moderate adverse effects with the embedded mitigation. Additional mitigation measures will be put in place, which include improved access to countryside features through enhanced permissive access routes and embedded and additional landscape screening planting to reduce the effects. However, the Scheme is temporary, and these effects will be reversed on the decommissioning of the Scheme.

6.14.27 Cumulative effects have been assessed, and they do not raise any additional issues. The significant public and other benefits of the Scheme set out in Section

4 are considered to outweigh any potential adverse effects on the tourism, public rights of way and recreational facilities. The Scheme accords with EN-1 (2023) and the NPPF, which support sustainable economic growth, existing and future land uses and community infrastructure, including rights of way.

6.15 Effects on Human Health

6.15.1 Section 4.4 of EN-1 (November 2023) describes the potential health impacts of energy NSIPs. EN-1 (November 2023), paragraph 4.4.7 states that:

"*Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example, for air pollution), which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.*"

6.15.2 Paragraph 4.4.8 goes on to state that:

"*However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts, such as noise.*"

6.15.3 NNJCS Policy 10, WNJCS Policy BN9, DLP Policies SP1 and CW1, SNLP Policy SS2, MKLP Policies EH7 and INF1 and EMKLP Policy GS4 state that development should seek to create healthy environments and communities.

6.15.4 In accordance with Section 4.4 of EN-1 (November 2023), the Applicant has assessed the impacts of the Scheme on human health, as set out in Chapter 18 of the ES **[APP-055]**. ES Chapter 18 **[APP-055]** considers the impacts of the Scheme on the social environment, including access and use of leisure and recreational facilities, the economic environment, particularly with regard to education and employment, bio-physical environment and the institutional built environment.

6.15.5 Chapter 18: Human Health **[APP-055]** concludes that during construction, no significant effects on health are anticipated in respect to open space, transport, air quality, water and land quality, noise and vibration and transport due to the implementation of embedded mitigation measures. These embedded mitigation measures include the provision of an Outline CEMP **[EX6/GH7.1_C]**, Outline Construction Traffic Management Plan **[EX6/GH7.9_C]** to offset construction from PRoWs and control HGV routing and numbers and a Construction Dust Management Plan **[APP-167]** to reduce vehicular emissions.

6.15.6 ES Chapter 18 **[APP-055]** adds that the Scheme is expected to lead to a positive health impact on access to work and training opportunities as a result of the local employment created. The Outline Skills Supply Chain and Employment Plan **[APP-552]** sets out how the Applicant will commit to promoting competition, innovation and skills within the communities surrounding the Scheme, seeking to maximise employment opportunities for local people.

6.15.7 ES Chapter 18 **[APP-055]** acknowledges that during construction, there is a medium negative impact during construction on Oakfield, Easton Maudit, given that it is located directly adjacent to the Scheme at Site F. Oakfield, Easton Maudit

is a specialist care facility, providing supported living accommodation to adults with physical and learning disabilities. Therefore, offsetting from this facility and restrictions on construction activity permitted within 100m, provides additional mitigation measures to reduce the impact on Oakfield.

6.15.8 Chapter 18: Human Health **[APP-055]** concludes that during the operational phase of the development, no significant effects are anticipated in respect to open space, transport, air quality, water and land quality, noise and vibration and transport due to the implementation of embedded mitigation measures. These embedded mitigation measures include embedded and additional landscape planting, maintaining a community contact during the lifetime of the Scheme and embedded dust management and vehicular emission controls and battery fire safety management protocols, set out in the Outline Operational Environmental Management Plan **[EX6/GH7.2_D]**, Outline Operational Traffic Management Plan **[REP1-157]** and Outline Battery Storage Safety Management Plan **[REP5-075]**.

6.15.9 Chapter 18: Human Health **[APP-055]** sets out additional mitigation measures during the operational phase, which include additional offsetting from residential care facilities within 100m and direct workers to find and register GPs in reasonable proximity to their accommodation where these surgeries have reasonable capacity to take on additional patients.

6.15.10 Chapter 18: Human Health **[APP-055]** concludes that during the decommissioning phase of the development, no significant effects are anticipated in respect to open space, transport, air quality, water and land quality, noise and vibration and transport due to the implementation of embedded mitigation measures. These embedded mitigation measures include maintaining a community contact during the lifetime of the Scheme, embedded dust management and vehicular emission controls set out in the Outline Decommissioning Statement **[EX6/GH7.3_C]**.

6.15.11 Chapter 18: Human Health **[APP-055]** sets out additional mitigation measures during the decommissioning phase, which include additional offsetting from residential care facilities within 100m and direct workers to find and register GPs in reasonable proximity to their accommodation where these surgeries have reasonable capacity to take on additional patients.

6.15.12 Regarding cumulative effects, ES Chapter 18: Human Health **[APP-055]** confirms that there are no anticipated cumulative effects anticipated to be related to climate change mitigation and adaptation, transport modes, access and connections (following construction), ground contamination, land quality, water quality and unexploded ordnance, noise and vibration, and radiation (specifically electromagnetic fields). These are assessed in each of their respective ES chapters. Therefore, it concludes that these topics are not considered to have residual significant cumulative effects on human health.

6.15.13 During the construction phase, ES Chapter 18: Human Health **[APP-055]** notes that although there will be an uplift in temporary accommodation due to the influx of workers, the cumulative effect on human health as a result of changes to access to suitable housing is of no greater significance than the Scheme

assessed in isolation. This is also the case for some PRoWs and one sports facility, more details of which are detailed in ES Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]**.

6.15.14 Chapter 18: Human Health **[APP-055]** also assesses the impact of the cumulatively assessed developments within the 2km Zone of Influence, notably Grendon Lakes BESS, Park Farm Way, Overstone Leys and North Overstone. It concludes that the affected communities are likely to be of medium sensitivity for existing communities who are affected by multiple development and therefore induce a cumulative medium temporary minor adverse effect. However, this is not a significant effect.

6.15.15 Regarding employment and income, ES Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]** confirms that there is likely to be a cumulative medium term temporary minor beneficial effect, however this is not classified as a significant effect.

6.15.16 In terms of cumulative effects on air quality during construction, ES Chapter 16: Air Quality **[APP-053]** confirms that Grendon BESS is the only development to cause any cumulative impacts, however these are not considered significant.

6.15.17 The Assessment confirms that the Scheme is not anticipated to be of a greater level of significance regarding the cumulative requirement for primary healthcare than as assessed in isolation and is therefore not a significant cumulative effect.

6.15.18 During the operational phase, Chapter 18: Human Health **[APP-055]** states that the cumulative impact on community identity, culture, resilience and influence is no greater than for the Scheme in isolation.

6.15.19 In terms of employment and training benefits, Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]** states that there is a cumulative long-term minor beneficial effect on human health. However, this is not considered significant.

6.15.20 As with the construction phase, ES Chapter 16: Air Quality **[APP-053]** confirms that the likelihood for cumulative impacts from air quality during the operational phase is the Grendon Lakes BESS. However, the cumulative effect is not expected to be significant. The Assessment also states that the Scheme is not anticipated to be of a greater level of significance regarding the cumulative requirement for primary healthcare than as assessed in isolation and is therefore not a significant cumulative effect.

6.15.21 With regard to the decommissioning phase, ES Chapter 18: Human Health **[APP-055]** states that cumulative effects are not anticipated. In terms of future employment during the decommissioning phase, the cumulative effect is not anticipated to be substantially greater than previously assessed for the Scheme in isolation.

Summary

6.15.22 ES Chapter 18: Human Health **[APP-055]** confirms that there are positives effects on human health as a result of the employment and skills training and education opportunity as well as significant employment generated during construction and

decommissioning as set out in Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]**. The Scheme, therefore, accords with EN-1 (November 2023), which support sustainable economic growth and the protection of health, existing and future land uses and community infrastructure, including PRoWs.

6.15.23 The Scheme includes embedded mitigation measures to reduce its impact. It also includes additional mitigation measures, particularly during the construction phase to reduce the impact on Oakfield Easton Maudit and primary healthcare services within the local area.

6.15.24 The Scheme is not considered to provide significant cumulative effects, including from the nearby Grendon BESS with regard to air quality. In terms of responding to local policies regarding active lifestyles, the Outline Public Rights of Way and Permissive Paths Management Plan **[EX6/GH7.10_C]** provides information on how these will be managed through all phases of development to ensure that PRoWs remain, open, accessible and safe for the public to use.

6.15.25 Therefore, the Scheme is compliant with EN-1 (November 2023) and NNJCS Policy 10, WNJCS Policy BN9, DLP Policies SP1 and CW1, SNLP Policy SS2, MKLP Policies EH7 and INF1 and EMKLP Policy GS4.

6.16 Arboriculture

6.16.1 As detailed in ES Chapter 19: Arboriculture **[APP-056]**, the arboriculture impacts of the Scheme have been assessed against paragraphs 5.4.32, 5.4.53 and 5.11.27 of EN-1 (November 2023). Hedgerow impacts have been assessed in ES Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]**.

6.16.2 There are no local plan policies that specifically relate to trees. North Northamptonshire District Council published a 'Trees and Landscape Supplementary Planning Document' in 2013, which provides advice on recognising, protecting and enhancing existing arboricultural features, such as mature trees, woodland and hedgerow.

6.16.3 ES Chapter 19: Arboriculture **[APP-056]** provides a summary of the tree survey results. However, full details of the tree survey are in the Tree Survey Schedule **[APP-170]** and the Preliminary Arboricultural Impact Assessment **[EX6/GH6.3.19.2_A]**.

6.16.4 ES Chapter 19: Arboriculture **[APP-056]** notes that during the lifetime of the Scheme, it is likely that the baseline arboricultural features will change negatively due to climate change and existing and future tree diseases, such as ash dieback.

6.16.5 ES Chapter 19: Arboriculture **[APP-056]** sets out embedded mitigation measures for the construction, operation and decommissioning phases into the Scheme's design. These embedded construction mitigation measures include avoiding root protection areas and canopy spreads of existing trees and woodlands, additional tree and woodland planting to compensate for any proposed losses, no provision of landscaping within the Veteran Tree Buffers Zones to avoid soil disturbance to veteran trees and widening the Cable Route Corridor adjacent to identified veteran trees to provide a sufficient buffer to allow for open cut trenching around the Veteran Tree Buffer Zones.

6.16.6 Embedded operation mitigation measures include perimeter fencing to protect the trees on the field boundaries of the Sites and using the same access tracks and points, used during construction, ensuring that there is no additional tree removal.

6.16.7 Embedded decommissioning mitigation measures include using the same access track and points, used during construction, ensuring that there is no additional tree removal and retaining cabling in situ, avoiding any future tree removal. However, if the removal of cables is required, then it may be possible to remove it at the jointing bays and extracting it from the ducting to avoid the need for significant lengths of open cut trenching, which may harm trees.

6.16.8 ES Chapter 19: Arboriculture **[APP-056]** considers the impact of the Scheme on ancient and veteran trees and ancient woodlands within the Sites during all phases of the Scheme and all arboricultural features within the Cable Route Corridor. It confirms that no ancient or veteran trees require removal at the Sites, nor any Ancient Woodland.

6.16.9 During the Construction Phase the significance of effect on all the veteran trees recorded at the Sites is considered to be major due to construction activities causing soil compaction, which could lead to long term canopy decline and the shortening of tree life expectancy. Therefore, additional mitigation measures, such as the installation of perimeter fencing, will be installed prior to construction commencing.

6.16.10 With regard to woodland trees at Green Hill F and G, these may be impacted by dust and/or sediment generated during construction activities, which may temporarily harm the health of the trees. Therefore, additional mitigation measures including dust and sediment control measures, are outlined in the Outline CEMP **[EX6/GH7.1_C]**.

6.16.11 ES Chapter 19: Arboriculture **[APP-056]** acknowledges that trees may have to be removed to facilitate the laying of the cable along the Cable Route Corridor, including some veteran (particularly A2F2-T2) and Category A trees. Therefore, additional mitigation measures are proposed, which include Horizontal Directional Drilling, tree protection fencing, root pruning/hand digging under the supervision of an Arboricultural Clerk of Works and ground protection where necessary. These methods are further detailed in the Preliminary Arboricultural Impact Assessment **[EX6/GH6.3.19.2_A]** and Outline Arboricultural Method Statement **[EX6/GH6.3.19.2_A]**.

6.16.12 During the operational phase of the Scheme, ES Chapter 19: Arboriculture **[APP-056]** notes a moderate and significant impact to the veteran tree F30-T2 during replacement activities at Green Hill F. This tree is surrounding by Solar PV Panels and may be impacted by machinery, causing soil compaction, which may result in a decline in the health of tree. Therefore, an additional mitigation measure will be implemented which prohibits machinery and materials storage within the tree's Veteran Tree Buffer Zone. This and other mitigation measures are secured in the OOEMP **[EX6/GH7.2_D]** and Chapter 19 Arboriculture **[APP-056].** The mitigation measures have been prepared in consultation with the relevant Councils.

6.16.13 During the decommissioning phase, ES Chapter 19: Arboriculture **[APP-056]**, it is anticipated that the removal of the panels will be from the existing access tracks and points, therefore no additional trees are set to be removed. It adds that no significant effects to the ancient and veteran trees and ancient woodland at the Sites are anticipated. In addition, the cables installed within the Cable Route Corridor are not anticipated to be removed during the decommissioning phase. If removal is required, then ES Chapter 19: Arboriculture **[APP-056]** advises that the cabling is removed from the jointing bays and extracted from the ducting to avoid the need for significant lengths of open cut trenching which may impact arboricultural features.

6.16.14 ES Chapter 19: Arboriculture **[APP-056]** has also considered the cumulative effects of the Scheme on arboriculture. After the assessment of two nearby planning applications to North Northamptonshire District Council, which could affect the same arboricultural features referenced in this ES Chapter, it is concluded that no cumulative effects to arboricultural features are anticipated.

Summary

6.16.15 Negligible and non-significant impacts are anticipated for ancient and veteran trees and ancient woodlands at the Sites, providing that the additional mitigation measures detailed in ES Chapter 19: Arboriculture **[APP-056]** and the Preliminary Arboricultural Assessment and Outline Arboricultural Method Statement **[EX6/GH6.3.19.2_A]** are implemented.

6.16.16 Canopy pruning to veteran tree A2F2-T2 to accommodate visibility splays adjacent to a temporary access point may result in a residential moderate impact. The Cable Route Corridor has been designed to avoid the removal of Category A trees, achieved through hand-digging, root pruning and/or targeted HDD.

6.16.17 In conclusion, ES Chapter 19: Arboriculture **[APP-056]** concludes that with the embedded and additional mitigation measures, there are no significant adverse impacts on ancient and veteran trees and ancient woodlands throughout all phases of the Scheme. The Scheme is therefore in accordance with paragraphs 5.4.32, 5.4.53 and 5.11.27 of EN-1 (November 2023).

6.17 Agriculture

6.17.1 Agricultural land can be classified as Grade 1, 2, 3a, 3b, 4 and 5 in accordance with its quality and productivity. This is known as its agricultural land classification (ALC) grade. Agricultural land classified in grades 1, 2 and 3a of the ALC is defined as 'best and most versatile' agricultural land (BMV land).

6.17.2 National and local planning policies is consistent in seeking to minimise impact on BMV land. It also seeks to guide development away from BMV land where possible, except where its use is justified by other sustainability considerations. National and local policy also requires the use of BMV land to be justified.

6.17.3 Paragraph 5.11.12 of the EN-1 (November 2023) states: "*Applicants should seek to minimise impacts on best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 4)*".

6.17.4 EN-1 (November 2023) paragraph 5.11.34 states that applicants should not site their scheme on the best and versatile agricultural land without justification. It adds that where schemes are to be sited on the best and most versatile land, the Secretary of State should take in account the economic and other benefits of the land.

6.17.5 EN-3 (November 2023) provides clarification and guidance on how policies relating to BMV agricultural land should be interpreted for solar NSIP schemes. It clarifies at paragraphs 2.10.28-2.10.34 that the development of solar arrays on BMV agricultural land is not prohibited and that given the scale of NSIP solar projects, the use of some agricultural land is likely. The compliance with policy is considered in light of this important clarification of the policy context.

6.17.6 At paragraphs 2.10.30 and 2.10.31 of EN-3 (November 2023), it is clarified that whilst the development of ground mounted solar arrays is not prohibited on sites of agricultural land classified 1, 2 and 3a, or designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73-2.10.92 and 2.10.107-2.10.126. It is recognised that at this scale, it is likely that applicants' development may use some agricultural land. However, applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land.

6.17.7 The NPPF (2025) requires in paragraph 187b, that the economic and other benefits of the BMV agricultural land be recognised in planning decisions. BMV agricultural land is defined as land in grades 1, 2 and 3a of the ALC. In the context of plan making, footnote 65 to paragraph 188 of the NPPF requires plan makers to seek to use poorer quality land in preference to that of a higher quality, however, the newly adopted NPPF amended the footnote (now 65) removing the need to consider the availability of agricultural land for food production. It is however noted that the 2024 Written Ministerial Statement on solar and BMV ('Solar and protecting our Food Security and Best and Most Versatile Land (BMV) Land') (2024 WMS) (Ref.74) has not yet been updated to reflect this change. The 2024 WMS reiterated planning policy in place at the time, including the need to consider the availability of agricultural land used for food production (albeit recent Secretary of State decisions confirm that the 2024 WMS does not introduce any new policy requirement and simply emphasises certain aspects of the existing policy in the NPSs, see for example the decision on West Burton solar farm). The amendment to the now footnote 65 excludes the consideration of food production as an important and relevant policy test. Whilst it is acknowledged that the 2024 WMS may be material in decision making (noting that it only emphasises elements of the existing NPS), it is clear that the publication of the NPPF (2025) is government policy and, to the extent the 2024 WMS could be suggested to introduce policy around food production, the NPPF amendments supersede the 15 May 2024 WMS issued by the former Secretary of State for Energy Security and Net Zero. It should be noted, that the current, Labour Secretary of State's statement in the House of Commons on the 18 July 2024 called "Clean Energy Superpower Mission" stated that:

"The biggest threat to nature and food security and to our rural communities is not solar panels or onshore wind; it is the climate crisis, which threatens our best farmland, food production and the livelihoods of farmers".

6.17.8 In view of the above, the NPPF (Ref.17) and NPS EN-1 (2023) (Ref.1) and EN-3 (2023) (Ref.2) (and 2024 WMS (Ref.74)) are now fully aligned with respect to the use of agricultural land within national planning policy (paragraph 5.11.12 of EN-1) (2023) requiring applicants to demonstrate that development of agricultural land is necessary and that impacts are minimised on BMV agricultural land. The Application has demonstrated through its site selection process as set out in ES Chapter 5: Alternatives and Design Evolution **[APP-042]** and the Appendix 5.1 Site Selection Assessment **[REP1-037]** that it is necessary and justified to use agricultural land and that the use of BMV has been minimised with no significant effects arising in terms of permanent loss. This fully accords with current policy.

6.17.9 NNJCS Policy 26, SNLP Policy SS2, MKLP Policy NE7 and EMKLP Policy CEA10 require seek to avoid development on the best and most versatile agricultural land.

6.17.10 NNJCS Policy 26 seeks that proposals for solar photovoltaic farms avoid the best and most versatile land and if necessary, would not have an unacceptable impact.

6.17.11 The clear need for the development to be clearly established and the benefits and/or sustainability considerations to outweigh the need to protect such land. The clear need for the Scheme and its benefits are set out at Section 4 and in the Statement of Need **[APP-556].** this Planning Statement. These significant public benefits are considered sufficient to outweigh the need to protect the 65% BMV land (made up of sites within West Northamptonshire (SNLP Policy SS2) and 75.6% BMV land (made up of sites within Milton Keynes (EMKLP Policy CEA10).

6.17.12 The following paragraphs consider the compliance of the Scheme with the policy objectives listed below, which are derived from the policy context described above:

- Sequential assessment of ALC and use of lower quality land in preference to BMV agricultural land.
- Minimisation of the impact on BMV agricultural land.
- Justification for the use of BMV agricultural land.

6.17.13 In considering the Scheme, the Applicant has had regard to agricultural land quality. Detailed Agricultural Land Classification surveys (ALC) have been undertaken to identify the grade of land within the Sites and this is reported in ES Chapter 20: Agricultural Circumstances **[APP-057]** and associated Appendix 20.1 (Agricultural Land Classification Technical Report) **[APP-172]**. The ALC Technical Report includes baseline information for the Cable Route Corridor, based on desk study information. This is because the development proposed is a buried cable, with the interruption of the existing agricultural use limited to the brief cable laying operation. Due to temporary and minimal disturbance on soils and agricultural land along the Cable Route Corridor during construction, a Soil Resource Survey will be undertaken post consent and preconstruction (instead

of an ALC survey) to inform the development of a detailed Soil Management Plan (DSMP).

Sequential Assessment of the ALC

6.17.14 The Site Selection Assessment **[REP1-037]** details the five-stage process that the Applicant undertook to select the location of the Scheme. This process is summarised at Section 6.3 of the Planning Statement.

6.17.15 There was no obviously preferable site that would enable construction of a solar farm of a comparable scale to the Scheme on non-agricultural land, or land that is of a lower ALC grade than the vast majority of the land within the Sites given other constraints. The land within the Sites therefore passes a sequential assessment based upon agricultural land quality.

6.17.16 The sequential approach taken in the Site Selection Assessment **[REP1-037]** has demonstrated that there are insufficient areas of available non-BMV land without constraints on which to accommodate the whole Scheme. The Scheme therefore complies with local policy and with EN-1 (November 2023), paragraphs 5.11.12-5.11.14 and 5.11.18.

Minimisation of the impact on BMV Agricultural Land

6.17.17 The Applicant has taken account of ALC ratings and agricultural land productivity throughout the development of the Scheme design and sought to minimise the amount of BMV agricultural land within the Sites. At the start of the Scheme, this included discussion with the landowners in order to focus the Scheme on land known from decades of experience to be least agriculturally productive and most difficult to farm effectively. This has minimised the impact of the impact of the Scheme on the viability of the wider landholding.

6.17.18 ES Chapter 5: Alternatives and Design Evolution **[APP-042]** and the Design Approach Document **[APP-560]** detail how the Sites were refined following the detailed ALC Technical Report **[APP-172]**. However, it is noted in the Farming Report **[APP-571]** that the wider land area comprises either 20-60% BMV or >60% BMV. Therefore, some proportion of BMV would inevitably be included as part of the Scheme design.

6.17.19 Other aspects of the Scheme further reduce and minimise impact on BMV land. Firstly, the Scheme is temporary and therefore reversible by its nature. It will be decommissioned after the end of its operational life. Upon decommissioning, the above-ground physical infrastructure will be removed and the Sites returned to the landowners. This will include areas of agricultural land where the agricultural resource has been maintained (and potentially improved) during operation as well as the established habitats. Post-decommissioning, the landowners may return the Sites to arable use, although it is assumed that established habitats, such as hedgerows and woodland, would be retained.

6.17.20 When considering the impact of the Scheme on BMV agricultural land, it is necessary to distinguish between the agricultural land as a long-term resource, agricultural production and arable management. The Scheme would not affect the long-term agricultural resource. It would also not affect the continuation of agricultural production if the land were to continue to be grazed. It is only the

arable management of parts of the Sites would cease during the life of the Scheme.

6.17.21 The Scheme effectively minimises impacts on agricultural land in line with local and national policy by: minimising as far as possible the inclusion of BMV agricultural land, retaining the ability to reinstate arable agriculture after decommissioning and facilitating a continued agricultural use through biodiversity management grazing throughout the operational life of the Scheme.

6.17.22 ES Chapter 20: Agricultural Circumstances **[APP-057]** states that during construction, the Scheme will cause significant moderate effects on Grades 1 and 2 land and significant moderate adverse effects on Grade 3a land. However, given that the Sites and Cable Route Corridor will be returned to their original use and condition as far as practicable, the magnitude of impact on agricultural land would be minor. In terms on the impact on soil during construction, ES Chapter 20: Agricultural Circumstances **[APP-057]** states that the Scheme will cause significant moderate adverse effects for BMV land. An Outline Soil Management Plan **[EX6/GH7.6_A]** has been prepared, which sets out the soil management strategy, approach and key measures during all phases of the Scheme. An Outline Construction Environmental Management Plan **[EX6/GH7.1_C]** is also submitted as part of this submission. A detailed Soil Management Plan will be developed pre-construction to provide further detail for soil handling during all phases of the Scheme.

6.17.23 During the operational phase of the Scheme, it is considered that some agricultural practices could continue (e.g. sheep grazing). Other activities would include vegetation management, equipment maintenance and services and scheduled replacement of panels and batteries, when required. The Soil Management Plan will be followed to mitigate any potential impacts. In addition, ES Chapter 20: Agricultural Circumstances **[APP-057]** states that the conversion of land currently under arable production to grassland, comprising the land between and under the solar panels, has potential benefits in relation to soil health. This is due to the potential increase in soil organic matter which would convert some mineral topsoil into organic topsoil, potentially increasing the ALC grades.

6.17.24 Following the decommissioning phase of the Scheme, all land would be reinstated to agricultural use. Therefore, ES Chapter 20: Agricultural Circumstances **[APP-057]** confirms that that significance of effects on soils and agricultural land is likely to be similar to what was assessed for the construction phase, in accordance with the Soil Management Plan which will be secured in the Outline Decommissioning Statement **[EX6/GH7.3_C]**.

6.17.25 ES Chapter 20: Agricultural Circumstances **[APP-057]** states that there is potential for significant cumulative effects. These other developments which could contribute towards these cumulative effects are located within the 2km Zone of Influence. The two largest developments are within North Northamptonshire and consist of two planning applications for a total of 4,000 new homes. These sites have been provisionally mapped as Grades 2 and 3. They have been allocated within the Wellingborough Local Plan Part 2 (2019).

As these sites have been allocated in the Wellingborough Local Plan Part 2, the effect from these two developments is considered to be 'not significant'. Therefore, ES Chapter 20: Agricultural Circumstances **[APP-057]** confirms that the cumulative effect is the same as the effect of the Scheme itself.

6.17.26 The Scheme is, therefore, considered to successfully minimise impacts upon BMV land in accordance with EN-1 (2023), paragraphs 5.11.12 to 5.11.14. Although ES Chapter 20: Agricultural Circumstances **[APP-057]** concludes that in total, 65% of land is classified as BMV land, there are insufficient areas of available non-BMV land without constraints, on which to accommodate the whole Scheme, which is detailed in ES Chapter 5: Alternatives and Design Evolution **[APP-042]**.

Furthermore, although more onerous that the requirements of EN-1 (November 2023), which seeks to ensure that applicants do not site their scheme on BMV land 'without justification', the Scheme is considered to generally comply with the requirements of NNJCS Policy 26, SNLP Policy SS2, MKLP Policy NE7 and EMKLP Policy CEA10, which seek to avoid any loss or damage to BMV land. ES Chapter 20: Agricultural Circumstances **[APP-057]** confirms the temporary loss of BMV land during the operational phase of the Scheme. After decommissioning, the agricultural land would be restored to previous conditions as set out in the Outline Decommissioning Statement **[EX6/GH7.3_C]** meaning that the effect would be neutral. Indeed, given the increase of topsoil organic matter during the operational phase, there may in fact be an increase in Agricultural Land Classification grades, which would result in a non-significant beneficial effect. Justification for the Inclusion of some BMV land within Order Limits

6.17.27 In terms of the specific areas of the 65% BMV land that are included within the Scheme, these are justified in accordance with paragraph 5.11.34 of EN-1 (November 2023) by particular factors related to their location and context within the Scheme, the wider landholding and in relation to adjacent and surrounding land. Table 5.9: Stage 4 – Design Updates up to DCO Submission of ES Chapter 5: Alternatives and Design Evolution **[APP-042]** sets out the changes made to the Scheme following the detailed ALC assessment and provides the detailed justification for retaining the areas of BMV land and an explanation as to why some were removed.

6.17.28 The inclusion of the 65% BMV land is further justified by the following:

- The urgent need for the delivery of a large amount of renewable energy.
- The lack of identifiable alternative sites within 20km Search Area around the Grendon Substation Point of Connection.
- The non-permanent, reversible impact of the Scheme on agricultural land meaning the permanent agricultural resource is not lost.
- The possible retention of an element of agricultural use throughout the life of the Scheme (e.g. sheep grazing).
- The Applicant's careful design to limit the amount of BMV land included within the Order limits so far as is practicable.

- Provision of a Soil Management Plan (see measures outlined in the Outline Soil Management Plan **[EX6/GH7.6_A]** to ensure the preservation of the soil resource at all the Sites, avoiding both the loss of soil material from the Site and the loss of soil functional capacity at the Sites. This will ensure that the land will be at least equal quality to that which existed prior to the development taking place.

6.17.29 The Scheme is therefore considered to comply with EN-1 (November 2023) paragraph 5.11.34. It also demonstrates that once the Scheme has ceased its useful life, the land will be restored to its former use and will be of at least equal quality to that which existed prior to the development taking place.

Viability of the Agricultural Holding

6.17.30 The Applicant has worked closely with the landowners in developing and finalising the boundary of the Order limits. The aim has been to develop on largely lower quality land within land holdings, to enable the retention of large areas of productive farmland and to avoid the creation of pockets of agricultural land that would be remote from the rest of the agricultural holdings.

6.17.31 An assessment of agricultural circumstances is contained within the Farming Report **[APP-571]**. There is a total of 12 different landholdings across the Sites and Cable Route Corridor. All landowners have entered into an option agreement for the Scheme. The Farming Report **[APP-571]** shows the extent of land within the Sites for each of these landholdings. The Report shows the following:

- Farm 1 farms all of Parcel A. The farm extends to 1,200ha of which 320ha is owned. The effect of the Scheme will be a reduction in farmed area of about 15%, but with the potential for sheep grazing to offset reduced arable areas.
- Farm 2 operates arable enterprises across Parcel A2. The block accounts to about 16% of the farmed area. However, there will be no severance and no significant adverse effects.
- Farm 3 occupies arable and grassland of Parcel B, which is in two different ownerships. The land forms part of a substantial farming enterprise, which owns, rents and contracts approximately 1,500 hectares. There will only be an approximate 5% reduction in the aera farmed.
- Farm 4 owners Parcel C and farms Parcel D and part of Parcel E. Parcel C adjoins an existing solar farm and is the proposed location for the substation and BESS. Parcel D comprises a series of arable fields which are proposed for solar PVs. Although there will be an approximate reduction in 40% of the farm, the farm is still able to continue to operate and will have income from the Scheme and potentially from farming sheep.
- Farm 5 tenants the western part of Block E. The Scheme is proposed to only affect a proportion of the farm.
- Farm 6 tenants six fields in a block at the northern end of Parcel F1. As the land is part of a larger farming business and is occupied on a non-secure,

short-term arrangement, it does not form a secure, long-term part of any farm.

- Farm 7 is a tenant of the Estate that owns Parcel F2. This land is held on tenancy from year to year.
- Farm 8 farms part of Parcel F on a contract basis from the tenant and farm Parcel G. Parcel G forms a bare block of arable land. Whilst these parcels represent approximately 20% of the farmed area, it is not considered that the effect will be significant.

6.17.32 ES Chapter 20: Agricultural Circumstances **[APP-057]** confirms that there is no key infrastructure, such as crop/fertiliser storage, sprayer filling and pesticide facilities etc. within the Scheme's boundary. Given that all of the Sites are blocks, there will be no severance in relation to farm activities. Therefore, the effects of the Scheme on Agricultural Holdings are considered to be not significant minor (adverse)-neutral. With regard to the BESS, approximately 10% of the Agricultural Holding will be lost during the construction and operational phases of the Scheme, ES Chapter 20: Agricultural Circumstances **[APP-057]** concludes that the impact is considered to be a minor adverse effect, which is not significant.

6.17.33 During operation, grass below and between the solar panels will need to be managed. This management can include grazing by livestock where appropriate. All farms will receive income from the Scheme's occupation of their land, a new diversified enterprise. This diversified enterprise will provide a new income stream independent of variations in profitability of arable production. The overall operational impact as a consequence of the Scheme is Minor or Neutral (adverse) resulting from a changed and potentially reduced level of agricultural activity. However, those effects are considered 'not significant'.

6.17.34 Decommissioning of the Scheme will allow a return of arable management of the land. However, there is no obligation for land to return to arable production just as at present there is no obligation to maintain arable management. There is assessed to be a short-term, reversible and local effect of decommissioning on the return of agricultural land to the farm businesses. In terms of Agricultural Holdings, the significance of effect is likely to be less as the underground cables may be removed or left in situ but not significant in EIA terms.

6.17.35 By avoiding as far as is practicable BMV land, enabling the continuation of grazing by livestock where appropriate during the operational phase, provision of a new income stream for farm businesses, which is independent of variations in profitability of arable production and enabling a return to arable management of the land upon decommissioning, the impacts of the proposal upon ongoing agricultural operations have been minimised. This approach accords with paragraphs 5.11.12-5.11.15 and 5.11.20 of EN-1 (2023). It also accords with the requirements of NNJCS Policy 26, SNLP Policy SS2, MKLP Policy NE7 and EMKLP Policy CEA10.

Summary

6.17.36 The Scheme minimises impacts upon BMV land as far as practicable in accordance with paragraphs 5.11.12-5.11.15 and 5.11.20 of EN-1 (2023). It also

accords with the requirements of NNJCS Policy 26, SNLP Policy SS2, MKLP Policy NE7 and EMKLP Policy CEA10, specifically:

6.17.37 Although 65% of the land is BMV land, it has been demonstrated that there are insufficient areas of available non-BMV land without constraints on which to accommodate the whole Scheme.

- A sequential approach to the locating of the Scheme, which has sought to direct development towards non-BMV land has been demonstrated.
- The inclusion of the BMV land within the Scheme has been justified by the nature of the Scheme and its design in accordance with paragraph 5.11.34 of EN-1 (November 2023).
- The Site Selection Assessment **[REP1-037]** demonstrates that the use of any other land in this area for a comparably sized scheme would likely result in a similar impact on agricultural land.
- The impacts of the proposal upon ongoing agricultural operations have been minimised by enabling continuation of grazing by livestock and provision of a new income stream for the farm businesses which is independent of variations in profitability of arable production; and
- Once the Scheme has ceased operation and been decommissioned, the land will be restored to its former use and will be of at least equal quality to that which existed prior to the Scheme taking place.

6.17.38 The significant public benefits of the Scheme, set out at section 4 of the Planning Statement, outweigh the reversible loss of 65% BMV agricultural land for the duration of the Scheme, particularly noting that EN-3 (November 2023), paragraph 2.10.29 states that land type should not be the predominating factor in determining the suitability of a site for solar development.

6.18 Electromagnetic Fields

6.18.1 The UK Policy on public exposure limits to Electromagnetic Fields (EMF) radiation is designed to comply with the 1998 ICNIRP (International Commission on the Non-Ionizing Radiation Protection) guidelines in terms of the 1999 EU Recommendation. In 2010 ICNIRP produced new guidelines, but these have not yet been incorporated into UK Policy. The public exposure limits in UK policy define reference levels for electric and magnetic fields.

6.18.2 EN-5 (2023) includes planning guidance for developers of nationally significant electricity network infrastructure projects (Ref.3).

6.18.3 Para 2.9.45 "*The intensity of both electric fields and magnetic fields diminishes with increasing distance from the source.*"

6.18.4 Para 2.9.46 "*Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms.*"

6.18.5 Para 2.9.48 to 2.9.49 "*To prevent these known effects, the International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health*

protection guidelines in 1998 for both public and occupational exposure. These are expressed in terms of the induced current density in affected tissues of the body, 'basic restrictions', and in terms of measurable 'reference levels' of electric field strength (for electric fields), and magnetic flux density (for magnetic fields). The relationship between the (measurable) electric field strength or magnetic flux density and induced current density in body tissues requires complex dosimetric modelling.

6.18.6 *The reference levels are such that compliance with them will ensure that the basic restrictions are not reached or exceeded. Exceeding the reference levels does not necessarily mean that the basic restrictions will not be met; this would be a trigger for further investigation into the specific circumstances."*

6.18.7 Para 2.9.51 "*The levels of EMFs produced by power lines in normal operation are usually considerably lower than the ICNIRP 1998 reference levels. For electricity substations, the EMFs close to the sites tend to be dictated by the overhead lines and cables entering the installation, not the equipment within the site."*

6.18.8 Para 2.9.54 "*In March 2004, the National Radiological Protection Board (now part of NIHP CRCE), published advice on limiting public exposure to electromagnetic fields. The advice recommended the adoption in the UK of the EMF exposure guidelines published by ICNIRP in 1998."*

6.18.9 Para 2.9.55 "*These guidelines also form the basis of the Control of Electromagnetic Fields at Work Regulations 2016. Resulting from these recommendations, government policy is that exposure of the public should comply with the ICNIRP 1998 guidelines. The electricity industry has agreed to follow this policy. Applications should show evidence of this compliance as specified in 2.10.11."*

6.18.10 Para 2.9.58 *"There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences."*

6.18.11 Para 2.10.12 "*Where it can be shown that the line will comply with the current public exposure guidelines and the policy on phasing, no further mitigation should be necessary."*

6.18.12 Para 2.11.13 *"Undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable."*

6.18.13 Para 2.11.16 and Page 34 present a simplified route map for dealing with EMFs, focusing on overhead lines.

6.18.14 The updated EN-5 (2025) (Ref.3) does not propose any new or materially change to the policy on the consideration of EMFs.

6.18.15 Regarding the impact of electromagnetic fields ES Chapter 21 Electromagnetic Field [**APP-058**] confirms that in terms of emissions, all electrical equipment emits electric and magnetic radiation. Power cables produce both electric and magnetic fields which can potentially affect human health. Radiation from underground cables is generally less than radiation from overhead powerlines because

emissions from adjacent conductors within a cable tend to cancel each other out. When assessing the impacts of overhead power lines, it is important to consider the impact of both electric and magnetic fields. Underground cables generally cause a negligible electric field above ground but can cause a significant magnetic field which is dependent on the current in the conductors.

6.18.16 Maximum electromagnetic radiation levels from the proposed underground cables are predicted to be below ICNIRP reference levels for single circuit configurations, but some cumulative trench configurations slightly exceed the limit, reaching up to 102.18 micro-Teslas, surpassing the 100 micro-Tesla reference limit. To mitigate this, a minimum setback distance of 5 metres has been recommended for these sections to ensure compliance with exposure limits. This mitigation is adhered to, as the closest dwellings are located over 17 metres from the cable route centreline, ensuring compliance with ICNIRP reference levels. . Additionally, radiation from the substations and BESS will not be significant, as they will be located at least 185m and 340m from any surrounding dwellings, respectively. For users of Public Rights of Way (PRoWs), any radiation effects are expected to be minimal due to their transient exposure.

6.18.17 In terms of the proposed underground cables, the maximum magnetic field in single circuit configuration is predicted to be 96.17 micro-Tesla which is below to the 100 micro-Telsa public exposure reference levels. However, some cumulative trench configurations with multiple high-voltage cables slightly exceed the reference limit, reaching up to 102.18 micro-Tesla.

6.18.18 To mitigate this, a 5m clearance distance is recommended for these sections, as receptors beyond this distance will not experience magnetic fields exceeding the reference levels. The closest identified dwellings to the cable route centreline are located much further than this at over 17m away, which is a safe distance, given that electromagnetic field strength decreases exponentially with distance.

6.18.19 Therefore, no significant impacts associated with the proposed underground cables are predicted.

6.18.20 In terms of the transformers and PV Inverters they are also predicted to produce fields at a lower level than that of underground cables because the equipment is typically housed in protective enclosures. Therefore, no significant impacts associated with the proposed conversion units are predicted.

6.18.21 The proposed substations and BESS for the Scheme will connect to Grendon Substation which is a National Grid distribution substation and will include connections to up to two 400kV substations located at Green Hill C and Green Hill BESS site along with five 123kV substations and 33kV substations located throughout the Site.

6.18.22 Electrical equipment associated with these substations produce fields at a lower level that underground cables. Also, the perimeters of Grendon Substation and the proposed 400kV substations are more than 185m from any identified dwelling and comply with public exposure limits, as electromagnetic fields from the equipment do not extend significantly beyond the perimeter fence. Therefore, as electromagnetic radiation levels reduce with increased distance, all nearby

dwellings and workplaces are expected to be situated at a safe distance from the BESS installations.

Summary

6.18.23 In summary, ES Chapter 21 Electromagnetic Fields **[APP-058]** the Scheme has been designed to mitigate any EMF impacts on human health. With the use of embedded mitigation measures and the implementation of well-established good industry practices, it is concluded that the Scheme will result in no significant adverse EMF effects on human health. Therefore, the Scheme is in accordance with EN-5 (November 2023).

6.19 Ground Conditions

6.19.1 Section 5.11 Land Use, including Open Space, Green Infrastructure and Green Belt requires that any risks arising from land instability and contamination is managed such that the site is suitable for use following development. These requirements follow those stated in NPS.

6.19.2 Section 5.11.13 of EN-1 (2023) states that applicants should identify any effects and seek to minimise impacts on soil quality, taking into account any mitigation measures proposed. Section 5.11.14 states that "*Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination*".

6.19.3 The Natural England Technical Information Note TIN049 (2012) also provides guidance related to land quality and soils management in relation to non-agricultural uses. It notes that "*Non-agricultural after use, for example for nature conservation or amenity, can be acceptable even on better quality land if soil resources are conserved and the long-term potential of best and most versatile land is safeguarded by careful land restoration and aftercare*."

6.19.4 In the Solar Photovoltaic Generation section of EN-3 (November 2023), Section 2.10.32 highlights that when solar developments are located on agricultural land, they should enable the continuation of agricultural use to maximise land-use efficiency. Section 2.10.34 outlines the requirement for Soil Management Plans to support the sustainable use and management of soils, aiming to minimise adverse impacts on soil health and potential contamination. Additionally, Section 2.10.34 emphasises the importance of protecting soil during construction by implementing mitigation measures that reduce damage to both in-situ and excavated, stockpiled soil. These measures are designed to preserve soil health and structure, minimise carbon loss, and maintain water infiltration and soil biodiversity.

6.19.5 In terms of local policies, NNPL policy 6, WNLP policy BN9 and BN10, and MLCP policy NE6 all generally state that in locations of potential ground contamination, new development should assess the ground condition and propose suitable mitigation measures to minimise the effects of any known or found contamination.

6.19.6 In terms of the baseline, Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** outlines the statutory and non-statutory sites designated for nature conservation at international, national and local levels. Chapter 11: Minerals **[APP-048]** considers the aspects in relation to minerals resources for each site area.

6.19.7 ES Chapter 22: Ground Conditions and Contamination **[REP1-025]** identifies the condition of the ground, the likely impact from the Scheme and suitable mitigation and management measures to minimise any impacts.

6.19.8 The way that potential environmental impacts have been or will be prevented, avoided or mitigated to reduce impacts to a minimum through design and/or management of the Scheme is outlined in the Chapter 22: Ground Conditions and Contamination **[REP1-025].**

6.19.9 A Construction Environmental Management Plan (CEMP) and Decommissioning Environmental Management Plan (DEMP) will be required for the construction and decommissioning phases through a requirement in the DCO, which will be based on the Outline Construction Environmental Management Plan (OCEMP) **[EX6/GH7.1_C]**, Outline Operational Environmental Management Plan (OOEMP) **[EX6/GH7.2_D]** and Statement (ODS) **[EX6/GH7.3_C]**. The plans will describe the construction, operational and decommissioning related mitigation measures and good practices to ensure any environmental impacts in terms of land and groundwater contamination are minimal. Given modern methods of construction and decommissioning used by other developments, the implementation of good practices and the schemes end use, there are not considered to be likely significant cumulative effects in conjunction with other developments in relation to ground conditions and contamination.

Summary

6.19.10 In summary, Chapter 22: Ground Conditions and Contamination **[REP1-025]** identifies that Green Hill A to G, the BESS and Cable Route Corridor would during construction, operational and decommissioning phases have no significant residual effects subject to the embedded mitigation measures being implemented.

6.20 Major Accidents and Disasters

6.20.1 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref.6) require assessment of the potential effects of the Scheme on the environment as a result of the vulnerability of the Scheme to major accidents or disasters, which are relevant to the Scheme.

6.20.2 Paragraph 4.13.2 of EN-1 (November 2023) (Ref.1) states that "*same technologies…will be regulated by specific health and safety legislation. The application of these regulations is set out in the technology specific NPSs where relevant*."

6.20.3 Paragraph 4.13.3 adds that "*some energy infrastructure will be subject to the Control of Major Accident Hazards (COMAH) Regulations 2015…COMAH regulations apply throughout the life cycle of the facility, i.e. from the design and build stage though the decommissioning. They are enforced by the Competent Authority comprising HSE…and the EA acting jointly in England*."

6.20.4 Paragraph 4.13.3 states: "*the same principles apply here as for those set out in the previous section on pollution control and other environmental permitting regimes*."

6.20.5 Paragraph 102 of the NPPF (Ref.17) advises that "*planning policies and decisions should promote public safety and take into account wider security and defence*."

6.20.6 ES Chapter 23: Major Accidents and Disasters **[APP-060]** considers a number of potential accidents and disasters taken forward for further consideration, including flooding, pollution, fires and explosions, road accidents, aviation incidents, dam or cut-off of utilities, unstable ground conditions and vegetation pests and diseases.

6.20.7 Minimising the risk of major accidents during construction, operation and decommissioning will be addressed through appropriate measures set out in the Outline CEMP **[EX6/GH7.1_C]**, Outline OEMP **[EX6/GH7.2_D]** and Outline Decommissioning Statement **[EX6/GH7.3_C]**. The detailed preparation and implementation of these documents will be secured via requirements to the DCO.

6.20.8 Regarding climate change and flood risk, ES Chapter 23: Major Accidents and Disasters **[APP-060]** confirms that the vulnerability of the Scheme to flooding has been mitigated through embedded design measures. During construction, it is considered that any anticipated impacts due to flooding are not severe nor significant. Mitigation measures during construction are set out in the Outline CEMP **[EX6/GH7.1_C]**. ES Chapter 23: Major Accidents and Disasters **[APP-060]** does concede that the number of extreme weather events will increase during the operational and decommissioning changes due to the effects of climate change, however, the level of effects to the Scheme is identified as not being significant. ES Chapter 10: Hydrology, Flood Risk and Drainage **[EX6/GH6.2.10_C]** provides further information as to the impacts on the Scheme from flooding.

6.20.9 In terms of pollution, ES Chapter 23: Major Accidents and Disasters **[APP-060]** concedes that there may be an increase in the risk of leak and spillages of hazardous materials during the construction and operational phases of the Scheme, causing pollution.

6.20.10 The risk of pollution and associated mitigation measures is further discussed in Chapter 10: Hydrology, Flood Risk and Drainage **[EX6/GH6.2.10_C]**, Chapter 22: Ground Conditions and Contamination **[REP1-025]** and Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]**. The Outline CEMP **[EX6/GH7.1_C]**, Outline OEMP **[EX6/GH7.2_D]** and Outline DS **[EX6/GH7.3_C]** set out mitigation measures to control the storage, handling and disposal of chemicals, fuels and oils. ES Chapter 23: Major Accidents and Disasters **[APP-060]** therefore concludes that during all phases, the standard control measures, implemented by the appointed contractor, will manage the risk of spillages and leaks so that no major accidents and disaster scenarios have been identified.

6.20.11 With respect to fire and explosions, an Outline Battery Storage Safety Management Plan **[REP5-075]** has been prepared for the Scheme. It provides a summary of the safety related information requirements which will be provided in advance of construction, using good industry practice to reduce the risk to life, property and the environment from the BESS.

6.20.12 ES Chapter 23: Major Accidents and Disasters **[APP-060]** acknowledges that impacts from fires and explosions related to the Scheme will impact on air quality and human health receptors. A Fire Incident Impact Assessment has been included within Chapter 16: Air Quality **[APP-053]** confirms that the effects from fires on human health to residential, public highway and rights of way are not considered significant.

6.20.13 The embedded mitigation measures set out in construction and maintenance of the BESS means that the impact from chemical and fuel leaks and BESS fires is not considered significant. ES Chapter 23: Major Accidents and Disasters **[APP-060]** confirms that in the event of a fire at BESS, its drainage will be automatically closed. This contained water will then be either treated and then released or tankered offsite as necessary. Therefore, the residual impact on the wider area's hydrology, as set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[EX6/GH6.2.10_C]** is considered to be negligible.

6.20.14 At Green Hill C and Green Hill BESS there is the potential risk of a battery fire subsequent discharge of chemicals into adjacent watercourses. This is most tangible for Green Hill BESS, which lies closest to the SPA of all the Sites, and adjacent to a stream which feeds into the River Nene. Ecological buffers have been embedded into the Scheme from an early state which includes a 250m ecological buffers. Additionally, embedded mitigation measures to minimise the likelihood and severity of battery fire have been incorporated into the Scheme, including the implementation of fire suppression systems, with containment measures in place to manage runoff in the event of a fire. These measures will minimise the likelihood of any adverse impacts during the operational phase. ES Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** confirms that no significant effects on otter and water vole are anticipated due to these embedded mitigation measures.

6.20.15 With respect to unexploded ordnance (UXO), a potential UXO has been identified within Green Hill G, given that the Site was an explosives demolition ground in World War II. Therefore, additional mitigation measures have been set out within ES Chapter 22: Ground Conditions and Contamination **[REP1-025]**. Therefore, subject to the implementation of these mitigation measures, the likely environmental effects from UXO are not considered significant.

6.20.16 ES Chapter 13: Transport and Access **[REP2-003]** assesses the impacts on road accidents and safety due to the Scheme. Chapter 23: Major Accidents and Disasters [**APP-060]**. The assessment includes the potential for accidents. The effects from the Scheme are not considered to be significant.

6.20.17 The delivery of 'large loads' during the construction phases will be managed through the abnormal loads assessment, set out in the ES to ensure that the potential effects are sufficiently mitigated. These large loads will be a temporary and the effect is not considered significant.

6.20.18 The construction phase is considered a worst-case scenario in terms of traffic due to the Scheme. Therefore, the effect on the operational and decommissioning phases will be lower than the construction phase. In addition, the potential environmental effects due to the spillage of pollutants or hazardous materials due

to highways incidents is not considered to be significant during all phases of the Scheme. ES Chapter 10: Hydrology, Flood Risk and Drainage **[EX6/GH6.2.10_C]** further considers these potential environmental impacts.

6.20.19 ES Chapter 15: Glint and Glare **[APP-052]** confirms that the location of the solar panels will be outside the 50-degree line of sight for road users. Therefore, the effect is not considered significant.

6.20.20 ES Chapter 15: Glint and Glare **[APP-052]** also considers the impact of the Scheme on aviation receptors. It concludes that no significant effects are predicted. Therefore, there are no significant effects relating to aviation accidents.

6.20.21 Regarding the damage or cut-off of utilities, ES Chapter 23: Major Accidents and Disasters **[APP-060]** confirms that the Scheme is not considered to have any adverse impacts on telecommunication, television or utilities as its layout been designed to adequately offset any underground and overground utilities. The laying of the cables will be laid at a 90-degree angle from the existing utility cables or, if required to be placed in parallel to the existing infrastructure, then they will be suitably offset to minimise any impact.

6.20.22 ES Chapter 24: Other Environmental Matters **[REP1-027]** sets out the mitigation measures to minimise any potential damage or severance of utility services. In addition, the Outline Construction Environmental Management Plan **[EX6/GH7.1_C]** ensures the implementation of high standards of work safety and competence.

6.20.23 Regarding unstable ground conditions, ES Chapter 23: Major Accidents and Disasters **[APP-060]** confirms that the risk of unstable ground due to current of past quarrying activity has been design out. This is because it will be considered as part of the detailed geotechnical design.

6.20.24 ES Chapter 22: Ground Conditions and Contamination **[REP1-025]** states that the implementation of additional mitigation measures will mean that the risk due to unstable ground conditions is not considered to be significant.

6.20.25 ES Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** considers the impact of the potential spread of invasive species during construction, operation and decommissioning. Precautionary measures have been taken to avoid the accidental spread of invasive species, which are set out in the Outline Landscape and Ecological Mitigation Plan **[EX6/GH7.4_E]**. These mitigation measures demonstrate that the residual effect of the spread of invasive species is 'neutral' and, therefore, not significant.

6.20.26 ES Chapter 23: Major Accidents and Disasters **[APP-060]** Additional mitigation measures throughout the life of the Scheme will be considered through appropriate risk assessments, secured via a requirement to the DCO. ES Chapter 27: Commitments Register **[APP-064]** sets out all the mitigation measures the Applicant is committed to (both embedded and additional mitigation) in the entirety of the ES. The Mitigation Schedule within that Chapter cross references the draft DCO, identifying where the mitigation measure is secured by the Requirement.

Summary

6.20.27 In summary, ES Chapter 23: Major Accidents and Disasters confirms that major accident effects are likely to result in no significant effects, through the implementation of the mitigation measures set out above. Therefore, the Scheme is in accordance with EN-1 (November 2023) and paragraph 102 of the NPPF (2025).

6.21 Waste

6.21.1 The Applicant has considered the waste streams arising from the Scheme, and the implications for existing waste facilities in the context of planning policy.

6.21.2 The Environmental Protection Act (1990) provides the structure and authority for waste management and control of emissions into the environment. Part II of the Act relates to Waste on Land and places a Duty of Care on anyone who produces, stores, transports or disposes of waste to take all reasonable steps to ensure that waste is managed properly. This Duty of Care will be applied throughout the lifetime of the Scheme.

6.21.3 The Waste (England and Wales) Regulations 2011 (as amended) transposed the EU Waste Framework Directive into domestic law in England and Wales. The Regulations require waste prevention programmes and waste management plans to apply the waste hierarchy, with prevention being the most preferred method, through reduction, recycling, recovering, to disposal as the least preferred method. The waste hierarchy is to be applied throughout the lifetime of the Scheme, predominantly at the construction and decommissioning phases.

6.21.4 The Waste Electrical and Electronic Equipment ('WEEE') Recycling Government Guidance Note (January 2014) provides specific advice about compliance with the WEEE Regulations 2013. The WEEE Regulations 2013 apply to all Electrical and Electronic Equipment ('EEE') placed on the market in the UK covered by the scope of the Regulations. Obligations are imposed on producers, distributors and consumers of EEE. The Applicant will comply with WEEE Regulations as relevant to the Scheme and will have regard to the DEFRA document titled "*Guidance on Best Available Treatment Recovery and Recycling Techniques (BATRRT) and Treatment of Waste Electrical and Electronic Equipment (WEEE)"* or other documents relevant at the time, when formulating its decommissioning strategy.

6.21.5 The Environment Act (2021) is to operate as the UK's new framework of environmental protection. Given that the UK has left the EU, new laws that relate to nature protection, water quality, clean air, as well as additional environmental protections, needed to be established. The Environment Act allows the UK to enshrine some environmental protection into law. It offers new powers to set new binding targets, including for (amongst other things) waste reduction. Part 3 is related to waste and resource efficiency, and will include obligations for managing waste, enforcement and regulation. The Applicant will accord with these regulations as far as is relevant to the Scheme.

6.21.6 The overarching National Policy Statement for Energy (EN-1 2023) sets out in Section 5.15 'Resource and Waste Management' the strategy for reducing the amount of waste where possible and trying to use it as a resource wherever

possible. Paragraph 5.15.8 states that "*the applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities*."

6.21.7 Paragraph 5.15.9 adds that: "*the arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation*."

6.21.8 It goes on further to state that applicants are encourage to source materials from recycled or reused sources as the UK is committed to moving towards a more 'circular economy'.

6.21.9 An Outline Construction Environmental Management Plan (CEMP) **[EX6/GH7.1_C]** and Outline Decommissioning Statement (DS) **[EX6/GH7.3_C]** have been submitted as part of this DCO application. Section 2.10 of the Outline CEMP **[EX6/GH7.1_C]** relates to recycling and waste and identifies measures to control and manage waste onsite. This includes (amongst other things) separation of the main waste streams onsite, prior to transport to an approved, licensed third party waste facility. Part of Table 3.1 of the Outline DS **[EX6/GH7.3_C]** also relates to waste. Both will be secured through a DCO requirement. Furthermore, a Site Waste Management Plan (SWMP), Construction Resource Management Plan (CRMP), Construction Environmental Management Plan (CEMP), Decommissioning Environmental Management Plan (DEMP) and Decommissioning Resource Management Plan (DRMP) will be prepared for the construction and decommissioning phases and will be approved by the relevant Planning Authority prior to works commencing in that phase. In this context, it is considered that the Scheme accords with the requirements of the 2023 NPS for Energy in respect of Waste Management.

6.21.10 The Northamptonshire Minerals and Waste Local Plan (NMWLP), which was adopted in July 2017, sets out the vision, objectives, spatial strategy and development management policies for minerals and waste development in Northamptonshire up to 2031. The policies in the Local Plan primarily focus on the provision of waste facilities and, therefore, are not considered explicitly relevant in the context of the Scheme NMWLP Policy 14 does outline a strategy for waste disposal capacity requirements during the Plan Period and provides indicative capacity requirements for non-inert landfill, inert recovering/landfill and hazardous landfill throughout the plan period.

6.21.11 As set out in the waste management section of ES Chapter 24: Other Environmental Matters **[APP-061]**, it is considered that there will be no significant effects on waste handling facilities in Northamptonshire and therefore, the Scheme is not likely to be in conflict with its existing policies in respect of waste management.

6.21.12 The Milton Keynes Waste Development Plan Document (MKWDP) (2007-2026) sets out the long-term spatial vision for Milton Keynes and the strategic policies required to deliver the vision as well was policies related to site-specific allocations. The policies in the Local Plan solely focus on the provision of waste facilities and therefore, are not considered explicitly relevant in the context of the Scheme.

6.21.13 As set out in the waste management section of ES Chapter 24: Other Environmental Matters **[APP-061]**, it is considered that there will be no significant effects on waste handling facilities in Milton Keynes, and therefore, the Scheme is not likely to be in conflict with its existing policies in respect of waste management.

6.21.14 As previously noted, the Outline CEMP **[EX6/GH7.1_C]** and Outline DS **[EX6/GH7.3_C]** are to be secured through a DCO Requirement, and a commitment is included to prepare and approve a SWMP, CRMP, CEMP, Decommissioning Environmental Management Plan (DEMP) and DRMP prior to commencement of the construction and decommissioning phases. These commitments in combination will ensure the construction and decommissioning waste is minimised.

6.21.15 NNJCS Policy 10, WNJCS Policy S10, NMWLP Policy 26, MKLP Policy SC1 seek a reduction in waste during construction and operational lifetime of a Scheme. It is considered that the Scheme accords with the requirements from these local policies as the Outline CEMP **[EX6/GH7.1_C]** and Outline DS **[EX6/GH7.3_C]**, as stated above, will be secured through a DCO Requirement. In addition, there is a commitment to prepare and approve a SWMP, CRMP, CEMP, DEMP prior to commencement of the construction and decommissioning phases.

6.21.16 The waste management section of ES Chapter 24: Other Environmental Matters **[APP-061]** assesses the waste impacts of the Scheme. When considered both in isolation and cumulatively within the Scheme's Order Limits and the expansive Study Area (comprising Northamptonshire Council, West Northamptonshire Council, Milton Keynes Council and Bedfordshire Borough Council), the environmental effects from waste generated by the Scheme and cumulative projects are considered to be as follows:

- The overall effects of waste handling facilities in the expansive Study Area are not likely to be significant at any phase of the assessed timeframe.
- No waste handling facilities in Northamptonshire are likely to see significant effects at any stage of the assessed timeframe.
- No waste handling facilities in Milton Keynes are likely to see significant effects during the construction or operational lifetime of the Scheme.
- Waste recycling and recovery handling facilities in Northamptonshire are not likely to see significant effects during the construction or operational lifetime of the Scheme.

- Waste recycling and recovery handling facilities in Milton Keynes are not likely to see a significant effect during the construction or operational lifetime of the Scheme.

6.21.17 It is considered that the anticipated impacts from the Scheme can be sufficiently mitigated through adherence to the measures set out in the Outline CEMP **[EX6/GH7.1_C]** and Outline DS **[EX6/GH7.3_C]**. These, along with these detailed documents to be provided post consent (i.e., the CEMP, SWMP, CRMP, DEMP and DRMP) will ensure that the Scheme is developed with good practices towards use of materials and water and that the management of waste is in accordance with the principles of the Waste Hierarchy. As no significant materials and waste effects have been identified in the waste management section of ES Chapter 24: Other Environmental Matters **[APP-061]** no additional mitigation measures are proposed.

Summary

6.21.18 In summary the Scheme is therefore considered to be in accordance with the Environmental Protection Act (1990), the Environment Act (2021), the Waste Framework Directive, the Waste Electrical and Electronic Equipment Regulations 2013, NPS-EN1 (November 2023) and N NJCS Policy 10, WNJCS Policy S10, NMWLP Policy 26 MKLP Policy SC1.

6.22 Cumulative and In-combination

6.22.1 The Applicant has considered any cumulative and in-combination effects arising from the Scheme.

6.22.2 The consideration of cumulative effects is addressed under each topic heading within Section 5 of the EN-1: Overarching National Policy Statement for Energy (November 2023) (Ref.1). Paragraph 4.3.3 of EN-1 (November 2023) explains that the EIA Regulations require an assessment of the likely significant effects of the proposed project on the environment. This includes direct, indirect, secondary, *cumulative*, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, as well as measures for avoiding or mitigating significant adverse effects.

6.22.3 Policy 26 of the North Northamptonshire Joint Core Strategy 2011-2031 (Ref.29) states that *"Proposals for sensitively located renewable and low carbon energy generation will be supported where it can be demonstrated that the proposal meets all of the following criteria: d) The siting of development does not significantly adversely affect the amenity of existing, or proposed, residential dwellings and/or businesses, either in isolation or cumulatively, by reason of noise, odour intrusion, dust, traffic generation, visual impact or shadow flicker; g) The development does not create a significant adverse cumulative noise or visual impact when considered in conjunction with other developments planned within North Northamptonshire and adjoining local authority areas;"*

6.22.4 Policy SC3 of the Milton Keynes Plan 2016 to 2031 states that "*Planning permission will be granted for proposals to develop low carbon and renewable energy sources (including community energy networks) unless there would be:*

1. *Significant harm to the amenity of residential area, due to noise, traffic, pollution or odour;*
2. *Significant harm to wildlife species or habitat;*
3. *Unacceptable landscape and visual impact on the landscape, including cumulative impacts;*
4. *Unacceptable harm to the significance of heritage assets; and*
5. *Unacceptable impact on air safety."*

6.22.5 Emerging Policy CEA6 of the MK City Plan 2050, which is at its Regulation 19 stage, states that development proposals for renewable energy generation "*will be strongly supported where it can be demonstrated that there will not be any significant negative adverse social, health, economic or environmental impacts*."

6.22.6 It adds that development for renewable energy generation and infrastructure required to facilitate the supply, including grid upgrades will be supported "*unless there would be...unacceptable cross-boundary effects*".

6.22.7 Cumulative and in-combination effects are assessed in each individual topic chapter of the ES. Cumulative and in-combination effects across all phases of the scheme will be assessed, and a summary of cumulative effects is provided in ES Chapter 25: Cumulative Effects and Effect Interactions **[APP-062].**

6.22.8 The methodology that has been used follows the relevant policy and appropriate industry guidance including the Planning Inspectorate Advice Note 17: cumulative effects assessment relevant to nationally significant infrastructure projects (Ref.77). A study area was established with each environmental topic establishing their own Zone of Influence (ZoI) within that study area.

6.22.9 Table 25.4 of ES Chapter 25: Cumulative Effects and Effect Interactions **[APP-062]** summaries the in-combination effects during construction and decommissioning phases.

6.22.10 Table 25.5 Chapter 25: Cumulative Effects and Effect Interactions **[APP-062]** summaries the in-combination effects during the operational phase.

6.22.11 Table 5.6 sets out the cumulative effects with other developments, there are found to be significant cumulative effects and residual cumulative effects with Grendon Lakes where there is a proposal for a battery energy storage system with significant effects on a PRoW (NN|TF|3) at construction, year 1 and year 15.

Summary

6.22.12 In summary the Scheme is therefore considered to be in accordance with North Northamptonshire policy 26 and Milton Keynes policy SC3.

7 Conclusions and Planning Balance

7.1 Compliance with Planning Act 2008 Decision-Making Requirements

7.1.1 The Scheme is required to be determined in accordance with Section 104 of the Planning Act 2008 (Ref.5). As set out in Section 6 of this Planning Statement, the relevant Section, 104(2) of the Planning Act 2008 requires that in deciding an application for development consent the Secretary of State must have regard to:

a) any relevant national policy statement,

b) any appropriate marine policy documents;

c) any local impact report;

d) any matters prescribed in relation to development of the description to which the application relates;

e) any other important and relevant matters;

7.1.2 In respect of part a) and paragraph 104(2)(a), the relevant NPSs are:

- EN-1 Overarching National Policy Statement for Energy (November 2023);
- EN-3 National Policy Statement for Renewable Energy Infrastructure (November 2023); and
- EN-5 National Policy Statement for Electricity Network Infrastructure (November 2023).

7.1.3 The application of the NPSs to the Scheme has been considered throughout the submitted documents and in particular in Section 6 of this Planning Statement

7.1.4 There are no marine policy documents relevant to the Scheme.

7.1.5 In regard to point c), it is expected that the affected local authorities will submit Local Impact Reports (LIRs) following submission of this application. The Scheme is in accordance with the relevant development plans, as set out in the Policy Compliance Document **[REP4-014]**.

7.1.6 For Section 104(2)(d), prescribed matters are set out in The Infrastructure Planning (Decisions) Regulations 2010. Regulation 3 requires the decision-maker to have regard for impacts on listed buildings, Conservation Areas, Scheduled Monuments, and their settings. These impacts have been considered within ES Chapter 12: Cultural Heritage **[APP-049]** and Appendices, as well as Section 6.10 above. Regulation 7 states that the decision-maker must have regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992. The impact of the Scheme on biological diversity is assessed by ES Chapter 9: Ecology and Biodiversity **[EX6/GH6.2.9_B]** and is discussed in Section 6.7 of this Planning Statement, taking account of Regulation 7 of the Decisions Regulations.

7.1.7 The SoS may consider that the updated NPSs EN-1, EN-3 and EN-5 published in December 2025 (Ref.13, Ref.14, Ref.15) are 'important and relevant matters' to which the SoS may have regard in reaching a decision under Section 104(2)(e). The updated NPSs have been addressed in Section 5.3 above.

7.1.8 Section 104(3) states that the SoS 'must' decide the application in accordance with relevant national policy statements, unless a number of exceptions apply:

- Where a decision would lead to a breach of international obligations (Paragraphs 104(4));
- Where a decision would lead to the SoS being in breach of any duty imposed by or under any enactment (Paragraphs 104(5));
- Where a decision would be unlawful by virtue of any enactment (Paragraphs 104(6));
- Where the adverse impact of the proposed development would outweigh its benefits (Paragraphs 104(7));
- Where 'any condition prescribed for deciding an application otherwise than in accordance with a national policy statement is met' (Paragraphs 104(8)).

7.1.9 The Applicant is not aware of any international obligations that would be breached by granting consent for the Scheme. The Applicant is not aware of any duties on the SoS that would be breached by granting consent for the Scheme. The Applicant is not aware of any enactments that would make granting consent for the Scheme unlawful. The Applicant has demonstrated how the benefits of the Scheme outweigh its adverse impacts. The Applicant has not identified any relevant prescribed conditions that prevent the application being determined in accordance with the NPSs.

7.1.10 At the heart of the policy and framework delivered in the Energy NPSs is the legally binding requirement for the UK to achieve Net Zero by 2050. Net Zero by 2050 is the ultimate target but the target milestones ahead of that are perhaps even more critical as they establish the pathway to ensure that Net Zero is achievable. Section 2.0 of the Statement of Need **[APP-556]** sets out the wider policy context and the progress which is being made towards the targets. Critically, it shows that urgent action is required to meet the 2030 and 2035 emissions targets and illustrates the urgency of need for low carbon generating infrastructure such as the Scheme and the timeframe in which it is able to start contributing to the national energy supply.

7.1.11 The Environmental Statement **[APP-038 to APP-062]** provides a robust assessment of the potential impacts of the Scheme and finds that there are limited significant adverse residual effects remaining after mitigation which are:

7.1.12 There are assessed to be moderate adverse significant landscape effects to the landscape local study area at construction and at year 1. These then decrease to moderate/minor adverse and not significant at year 15 and decommissioning. Effect on the landscape fabric are not significant at construction and year 1 (moderate/minor neutral) but then move to moderate beneficial significant effects at year 15 and decommissioning. There will be cumulative impacts of the Scheme and Grendon Lakes BESS on a PRoW. These impacts predominantly occur during construction and at Year 1 of operation From Year 15 of operation, and decommissioning, the implementation of green infrastructure and planting

measures ensure that there is a reduction in the significance of the effects for the majority of the overall lifetime of the Scheme.

7.1.13 Significant beneficial effects are likely on receptors in relation to:

- Climate in relation to greenhouse gas emissions.
- Landscape in relation to effect on vegetation infrastructure (once planting is established).
- Biodiversity in relation to habitat for notable arable flora (for targeted managed areas), and ground nesting birds (once habitats are established).
- Cultural Heritage in relation to above and below ground assets and finds.
- Traffic and Transport in relation to new PRoW connections.
- Construction jobs and other employment opportunities including training.

7.1.14 It is clear that there is a compelling case for the need for the Scheme which will deliver national economic and social benefits in line with the Government's objective of delivering sustainable development.

7.1.15 Section 3 of this Planning Statement sets out the demonstrable benefits that will be delivered by the Scheme should consent be granted. In addition to the generation of a significant quantity of low carbon energy which makes a meaningful contribution to the UK's legally binding net zero commitment and is a source of domestic energy security that limits UK consumers exposure to volatile energy prices, the Project will also deliver:

- The provision of battery storage which maximises efficiency of the land and grid capacity, as encouraged by EN-3 (2023).
- Ecological enhancement measures that will result in a secured commitment to deliver a minimum of 10% in Biodiversity Net Gain.
- At peak construction time, creation of approximately 876 construction jobs with average of 464 FTEs equivalent employees per annum (the decommissioning phase will require 80% of the workforce required for the construction phase).
- Creation of approximately 182 FTE in operational jobs
- Provision of Outline Employment, Skills and Supply Chain Plan [**APP-552**] which will:
  - Increase direct and indirect employment and opportunities;
  - Open the potential of the Scheme and other similar schemes in the local area, to encourage the next generation to take up careers in the renewable energy sector and invest their futures in Northamptonshire;
- Engage effectively with local businesses and wider supply chain; and
- Assist in development and dissemination of local knowledge and skills relating to renewable energy infrastructure.

7.1.16 The combined nature of these additional benefits is considered to carry substantial weight in favour of the Scheme.

7.2 Planning Balance

7.2.1 The Applicant set out with the objective to deliver a significant quantity of renewable energy, of NSIP scale, to the National Grid and contribute to the UK's wider decarbonisation of energy supply. Through the careful selection of an appropriate site which benefited from suitable topography and irradiance and connection to the National Grid through to the detailed design measures the Applicant has developed a proposal which is sensitive to local context. EN-1 (2023), at paragraph. 4.1.3, notes that given the urgency for the type of infrastructure covered in the energy NPSs, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs.

7.2.2 The need for such development is such that the UK Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure (para. 4.2.4 of EN-1 (2023)). Para. 4.2.5 confirms that solar development falls within the category of CNP by stating that low carbon infrastructure for the purposes of that policy means all onshore and offshore electricity generation that does not involve fossil fuel combustion.

7.2.3 The designation of such infrastructure as CNP subsequently engages paragraph 3.3.63 of EN-1 (2023) which states that "*subject to any legal requirements, the urgent need for CNP infrastructure to achieving our energy objectives, together with the national security, economic, commercial and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy*".

7.2.4 The policy landscape set by the Energy NPSs illustrates the Government's position in a very clear way and confirms that the principle of the development is not just accepted, it is of critical importance and priority at a national level. This landscape paves the way for well-considered projects to receive favourable recommendations from the Planning Inspectorate and an eventual grant of consent by the Secretary of State. However, despite the strength of the policy it does not immediately imply that all proposals for such infrastructure will receive approval. There are a number of tests and justification required to be demonstrated by the Applicant as to why a chosen site is an appropriate location for the proposed infrastructure and that any adverse environmental impacts have been mitigated as far as practicable with the application of the mitigation hierarchy. EN-1 (2023) also places significant emphasis on the importance of good design throughout the NSIP process. This means more than sensitive siting of infrastructure and includes consistent decision making based on sound environmentally led principles.

7.2.5 Good design has been embedded into the Scheme from the outset of the site selection process with the search process seeking to avoid areas of higher landscape sensitivity. In this context the first tier of the mitigation hierarchy, has been applied as there are no local or national landscape designations which would be impacted by the Proposed Development. At a site-specific level, a comprehensive mitigation package has been embedded into the design of the

Scheme to date with further commitments made to minimise any likely significant impacts. However, the nature of the Scheme, the sensitivity of receptors and the existing rural context mean that there are some impacts which cannot be mitigated. The Applicant considers given the acute need for the Scheme it has taken all reasonable measures to minimise these likely significant effects.

7.2.6 In a policy context, paragraph 5.10.5 of EN-1 (2023) accepts that there will likely be some impact in terms of landscape and visual effects as a result of DCO scale energy projects, stating: Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may be beneficial landscape character impacts arising from mitigation.

7.2.7 On land use, the Applicant acknowledges that 65% of the Scheme is BMV land that will be temporarily used for the purposes of accommodating Solar PV Development and associated infrastructure. Decommissioning of the Scheme will allow a return of arable management of the land. However, there is no obligation for land to return to arable production just as at present there is no obligation to maintain arable management. The significant public benefits of the Scheme, set out at section 4 of the Planning Statement, outweigh the reversible loss of 65% BMV agricultural land for the duration of the Scheme, particularly noting that EN-3 (November 2023), paragraph 2.10.29 states that land type should not be the predominating factor in determining the suitability of a site for solar development.

7.2.8 As with landscape impact, the general nature of the type of land that lends itself to large scale solar development is rural and often in agricultural use. Nevertheless, the Applicant has sought to limit the amount of higher-grade agricultural land within the Order Limits and once the Order Limits were defined and the detailed characteristics of the soil quality were understood, the Applicant sought to avoid the use of BMV, where possible as set out in ES Chapter 5: Alternatives and Design Evolution **[APP-042]** and ES Appendix 5.1 Site Selection Assessment **[REP1-037]** .

7.2.9 EN-3 (2023), while setting a preference for the type of land to be used for solar development, is clear the land type should not be a predominating factor in determining the suitability of a site. It goes further to accept that it is likely that agricultural land will form part of an applicant's proposals, and that ground mounted solar PV development is not prohibited on BMV. It is also important to note that there is no planning policy which requires agricultural land to be farmed. Indeed, farmers are actively encouraged to take land out of arable use to help regenerate soil and combat the biodiversity crisis.

7.2.10 With the exception of the agricultural land required for green infrastructure, the land to be used will be used temporarily with the land being returned to agricultural use at the end of the Scheme's lifetime. Nevertheless, the ES has confirmed that significant effects are encountered, despite the context of that loss relating to green infrastructure, and limited weight may be applied against the Scheme in the planning balance.

7.2.11 The Scheme makes a significant contribution towards the UK's solar targets for reaching Net Zero. The Applicant is well resourced and in a strong position to deliver the Scheme and within a timeframe that means the generation of low

carbon energy will also occur in a timely manner and contribute to 2030 and 2035 pathway targets.

7.2.12 As a CNP project, the Scheme benefits from the strongest policy position set out in national planning policy. EN-1 (2023) sets out a presumption in favour of energy related development. This Planning Statement confirms that the Scheme complies with EN-1, EN-3 EN-5 (2023), the NPPF and Local Plans. Where significant adverse effects have been identified the Applicant has demonstrated its application of the mitigation hierarchy and careful consideration of design. However, impacts on landscape and visual receptors and soils and agricultural land which cannot be avoided, reduced or mitigated, as per paragraph 4.2.11 of EN-1 (2023), remain. Cumulative impacts are also considered, as per the requirements of paragraph 4.2.12 of EN-1 (2023), and identify a significant impact which cannot be avoided, reduced or mitigated in relation to landscape and visual receptors.

7.2.13 Where residual non – HRA or non-MCZ impacts remain after mitigation paragraph 4.2.15 of EN-1 (2023) is therefore engaged. This states "*where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts".*

7.2.14 The residual effects in this case are limited to temporary landscape and visual effects, before planting has matured, which are, in all but one instance, then reduced to not significant by year 10 and permanent loss of BMV agricultural land as a result of mitigation and enhancement. It is considered that these residual impacts do not meet the “exceptional circumstances” test and therefore do not warrant refusal. Furthermore, there is no unacceptable interference with human health and public safety, defence (particularly in relation to MOD assets), irreplaceable habitats or unacceptable risk to the achievement of net zero. Accordingly, the balance is firmly in favour of approval.

7.2.15 In addition, there are a significant number of additional benefits that would be achieved by the Scheme, as outlined above. The Scheme is a well-considered and effectively designed proposal that responds to the locality and is sensitive to the local environment. It is therefore concluded that Development Consent should be granted.

7.3 Critical National Infrastructure

7.3.1 The development of nationally significant low carbon infrastructure has been designated as a critical national priority (CNP) in EN-1 (2023) paragraph 4.2.4. As set out in Paragraph 4.2.7 of EN-1 (2023), the CNP policy is taken into account in decision making following the establishment of the need case, the assessment of impacts, and design of mitigation in the normal way.

7.3.2 EN-1 (2023) paragraphs 4.2.10 to 4.2.13 list a number of requirements to be met by applicants for CNP infrastructure, which include, of relevance to this application: meeting the requirements of NPSs EN-1, EN-3, and EN-5 (2023); applying the mitigation hierarchy and demonstrating that it has been applied;

complying with any other legal and regulatory requirements; demonstrating that all residual impacts are those that cannot be avoided, reduced or mitigated; setting out how residual impacts will be compensated for as far as possible; setting out how any mitigation or compensation measures will be monitored and controlled; considering cumulative impacts. As summarised in this Planning Statement, the Application as a whole complies with these requirements.

7.3.3 EN-1 (2023) paragraph 4.2.15 states that there is a 'presumption of consent' for any application with only residual non-HRA or non-Marine Conservation Zone impacts as these impacts will be outweighed by the urgent need. None of the exceptional types of residual impact, relating to human health and public safety, defence, irreplaceable habitats and the risk to the achievement of net zero, exist for this application.

7.3.4 This application is CNP infrastructure and does not have unacceptable residual or HRA impacts. It therefore benefits from a presumption of consent supported by EN-1 (2023).

7.4 Conclusion

7.4.1 This Planning Statement has set out how the Scheme complies with PA 2008, EN-1, NPS EN-3 and EN-5 (2023), including the updated versions published in December 2025, the NPPF and development plans. Whilst it has not been possible to avoid all impacts, these have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies secured through this DCO Application. The national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. In addition, CNP policy requires that residual impacts are outweighed by the urgent need. Therefore, it is considered that development consent for the Scheme should be granted.

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Appendix A: Planning Application History Search – Sites including Cable Route Corridor

Introduction

The planning application history information contained within this document has been compiled using the online application search function available from North Northamptonshire Council, West Northamptonshire Council, Milton Keynes City Council, and Bedford Borough Council.

The planning history relates to each Green Hill Site and the cable route corridor between each site.

Planning Applications on the Sites

Table A.1: Green Hill A

Reference and Application Date	Description	Decision and Date
2025/0041/PND received 24/12/24	Determination as to whether prior approval is required for a new hay barn with steel portal frame under Schedule 2 Part 6	Prior Approval Not Required 26/02/25
DA/2019/0512 received 17/06/19	Construction of farm access and internal farm track	Approved 15/08/19
DA/2014/1124 received 14/12/14	Construction of new agricultural field access	Approved 05/03/15

Table C.1: Cable Corridor between Green Hill A and Green Hill A.2.

Reference and Application Date	Description	Decision and Date
DA/2020/1039 received 16/11/20	Removal of hedgerows in Overstone and Hannington parishes	Approved 04/01/21
DA/2018/0599 received 10/07/18	Variation of planning conditions 5, 7, 11 & 13 of planning permission DA/2014/0694 relating to pre commencement conditions for construction management, security details, soil enhancement and landscaping	Approved 13/03/19
DA/2014/0694 received 07/08/14	Construction of ground-mounted solar park and associated fencing, equipment housing, access tracks and CCTV	Approved 09/07/15
DA/2014/0404 received 19/05/14	Removal of hedgerow 24 locations	Approved 08/070/14

Reference and Application Date	Description	Decision and Date
DA/2013/0077 received 05/02/13	Removal of 5m hedge at 10 locations	Approved 11/03/13
DA/1993/0265 received 29/03/93	Detailed application for a permanent agricultural dwelling	Approved 01/09/93
DA/1989/1143 received 30/08/89	Temporary mobile dwelling	Unknown
DA/1989/0226 received 16/02/89	Erection of farm dwelling	Approved 03/05/89
DA/1988/1422 received 07/10/88	Erection of agricultural bungalow	Unknown
DA/1988/0294 received 09/03/88	Erection of farmhouse and buildings	Approved 19/08/88
DA/1984/0123 received 27/02/84	Details of dwelling approved of reserved matters	Unknown 23/04/84
DA/1983/0572 received 25/07/83	Formation of access to two fields	Approved 12/10/83

Table A.2: Green Hill A.2

Reference and Application Date	Description	Decision and Date
2025/0006/FULL received 19/12/24	Conversion of agricultural building (Use Class Sui Generis) to a 2-bedroom dwelling house (Use Class C3) and associated works	Pending
DA/2020/0333 received 24/04/20	Construction of hay store, day room and tack room building.	Approved 01/07/20
DA/2015/0842 received 09/09/15	Construction of stable block	Approved 03/11/15
DA/2010/0887 received 14/10/10	Dismantle existing overhead line and construct a replacement line	No observations dated 01/12/10

Reference and Application Date	Description	Decision and Date
DA/2007/0515 received 01/05/07	Removal of hedgerows	Approved 11/06/07
DA/1997/0221 received 17/03/97	Six sector antenna, four 600mm microwave dishes, 22.5 metre telecommunication tower, equipment cabin and ancillary development.	Withdrawn 21/07/97
DA/1991/0067 received 20/01/91	Outline application for buildings, new access & use of site for offices, repair workshops and plant storage	Refused 23/02/91

Table C.2: Cable Corridor between Green Hill A.2 and Green Hill B

Reference and Application Date	Description	Decision and Date
2024/1220/SCRN received 14/02/24	Proposed dualling to the eastern section of the existing A43	EIA not required 14/06/24
DA/2020/1039 received 16/11/20	Removal of hedgerows in Overstone and Hannington parishes	Approved 04/01/21

Table A.3: Green Hill B

Reference and Application Date	Description	Decision and Date
DA/2003/0265 received 05/03/03	Game bird rearing unit	Approved 15/04/03
DA/2001/0948 received 31/08/01	Change of use of redundant farm building to B1 office use	Approved 28/11/01

Table C.3: Cable Corridor between Green Hill B and Green Hill C

Reference and Application Date	Description	Decision and Date
NW/22/00154/LDE received 04/03/22	Application for a lawful development certificate for an existing use for a clay pigeon shooting club	Established Use 24/05/22

Reference and Application Date	Description	Decision and Date
WP/2010/0020 received 22/01/10	Creation of undulating area on existing shooting ground through the importation of inert material and the temporary siting of a mobile crusher and screen to separate soils and recycled secondary aggregates to use in the construction of the mounding and already permitted go-kart track.	Approved 21/04/10
WP/2009/0510 received 14/12/09	Installation of a simple lighting system to new all weather paved runway	Withdrawn 19/02/10
WP/2004/0680 received 17/09/04	Steel framed agricultural barn.	Approved 01/11/04
WP/2004/0010 received	Change of use of existing barn used for light industrial to holiday accommodation/bed and breakfast accommodation (5 units of accommodation proposed).	Approved 09/05/04
WP/2003/0495 received 08/08/03	Two year temporary permission for a temporary installation comprising a 20m high GSM logistics XT tower, 3 no. airwave antennae, 1 no. airwave 300mm microwave dish, a ground based equipment cabin and ancillary development thereto.	Withdrawn 15/12/03
WP/1994/0473 received 18/10/94	Change of use of existing vacant outbuilding for use as bed and breakfast facilities	Approved 21/06/95
WR/1973/0216 received 14/06/73	Erection of Dutch barn/covered cattle yard	Approved 27/06/73
WR/1972/0223 received 01/06/72	Alterations and additions to dwelling	Approved 23/06/72
WR/1971/0089 received 15/04/71	Grain storage building	Approved 18/05/71

Table A.4: Green Hill C

Reference and Application Date	Description	Decision and Date
NW/24/00349/FUL received 07/06/24	Proposed detached two storey building containing 3 space car port with habitable accommodation above. Change of use from agricultural land to residential.	Approved 25/09/24
NW/23/00342/FUL received 14/06/23	Proposed change of use of land from B2 (light industrial) to B8 (storage) and erection of 17 no. self-storage containers.	Approved 01/08/23
NW/23/00001/FUL received 03/01/23	Single storey rear extension with flat roof, parapet walls and a glazed roof lantern along with a first floor rear balcony with railings on three sides served off a first floor bedroom	Approved 01/03/23
NW/22/00288/FUL received 27/04/22	Replacement of existing offices and welfare buildings with a single storey building	Approved 23/06/22

Reference and Application Date	Description	Decision and Date
NW/22/00100/FUL received 17/02/22	Erection of 4-bedroom family dwelling, ancillary to the operation of the farm. Retrospective application, (the originally approved planning permission reference is WP/15/00229/FUL)	Approved 13/04/22
NW/21/00712/AMD received 13/08/21	Application for a non-material amendment following a grant of planning permission reference WP/15/00229/FUL - to regularise changes to doors/windows, raising the garage roof to match the existing house, and single storey rear extension.	Withdrawn 24/09/21
WP/20/00196/VAR received 25/03/20	Application for variation of condition 1 of planning permission ref: WP/17/00793/VAR to allow an extension to the permission end date to extend the operational lifespan of the Solar Farm. This permission is for a temporary period and the structures and other associated paraphernalia are to be removed and the land reinstated to its former condition forty years and six months from 31 March 2016 (the date of the first export of electricity).	Approved 23/06/20
WP/19/00423/FUL received 15/07/19	Proposed all weather riding arena and associated stable block building for personal use by the applicant	Approved 09/09/19
WP/19/00270/AMD received 02/005/19	Application for a non-material amendment to planning permission ref: WP/15/00229/FUL to increase the footprint at the rear of the property to enlarge the kitchen/dining room	Withdrawn 05/06/19
WP/18/00511/CND received 31/07/18	Details submitted pursuant to condition 3 (landscaping design and planting of trees and shrubs) and condition 4 (details of the boundary treatments) of planning permission ref: WP/15/00229/FUL	Part discharged 11/09/18
WP/17/00793/VAR received 19/12/17	Application for variation of condition 2 of planning permission ref: WP/14/00368/FUL to allow extension to permission end date	Approved 23/02/18
WP/17/00447/PNA received 11/07/17	Prior notification of agricultural development - proposed building - horticultural storage barn	Approved 25/06/17
WP/17/00364/FUL received 05/06/17	Use of land to provide secure storage for touring caravans (part retrospective)	Approved 03/08/17
WP/16/00766/AMD received 06/12/16	Non-material amendment to planning permission ref: WP/14/00368/FUL to allow for addition of iDNO substation (same in design as existing customer substation) and associated fence (weld mesh - as permitted), repositioning of south side customer substation and addition of fencing (weld mesh - as permitted) and additional internal fence (deer fencing - as permitted) between north and south sites. Removal of AUX transformer.	Approved 20/12/16
WP/15/00321/AMD received 19/05/15	Non material amendment to planning permission ref: WP/14/00368/FUL/WP/14/00840/AMD to allow 1.	Approved 10/06/15

Reference and Application Date	Description	Decision and Date
	Inclusion of an additional customer substation 2. The removal of one inverter transformer station and infilled with solar panels 3. Stock proof fencing along the access through the southern phase of the solar farm to the northern phase 4. Division of the site with deer fencing 5. Omission of some panels to allow for the inclusion of deer and stock fencing 6. Additional CCTV to the site perimeter.	
WP/15/00229/FUL received 13/04/15	Construction of 2 storey dwelling and triple garage and farm office	Approved 08/06/15
WP/14/00840/AMD received 22/12/14	Non material amendment to planning permission ref: WP/14/00368/FUL to allow change in design from a brick built substation to separate DNO and Customer Substations including auxiliary transformer, change in location of the substation to now be included within the solar fenceline, rather than beside the highway, change in design of the inverters and transformers, representing a reduction in size, reduction in the number of inverters and transformers, from 16 in total to 14 in total.	Approved 08/01/15
WP/14/00368/FUL received 03/06/14	Installation of a 10MW solar farm and associated infrastructure	Approved 29/10/14
WP/14/00303/OUT received 02/05/14	Outline planning application with some matters reserved (access to be determined at this stage) for a replacement dwelling and relocated access	Approved 10/07/14
WP/2003/0291 received 16/05/03	Dairy youngstock unit with associated buildings and dwelling house - reserved matters application for landscaping and drainage (Approval No. WP/2000/0144/O).	Approved 14/08/03
WP/2000/0144 received 16/03/00	Dairy young stock unit with associated buildings and dwellinghouse	Approved 24/05/00
WP/1996/0252 received 11/06/96	Dairy young stock unit, associated buildings and dwellinghouse	Approved 04/09/96

Table C.4: Cable Corridor between Green Hill C and Green Hill D

Reference and Application Date	Description	Decision and Date
WP/2010/0099 received 11/03/10	Storage container (prior notification for new agricultural building)	Approved 03/03/10

Table A.5: Green Hill D – no relevant planning history

Table C.5: Cable Corridor between Green Hill D and Green Hill E

Reference and Application Date	Description	Decision and Date
WP/18/00091/CRA received 02/02/18	Non-Material Amendment to Conditions 2 (Commencement of Development) and 7 (Protection of Hedgerows) of planning consent ref. 15/00091/MINVOC to alter the approved scheme for tree and hedgerow protection.	No decision required 07/02/18
WP/15/00791/CRA	Variation of conditions 2, 16, 17 and 43 of planning permission 10/00066/MINEXT to amend working scheme	No Objection 12/02/16
WP/2013/0627	Non-Material Amendment to Planning Permission 10/00066/EXT to amend working programme.	Approved 26/11/13
WP/2011/0044	Removal and replacement of 6m of hedgerow	Withdrawn
WP/2010/0443 received 07/10/10	Replacement of extant planning permission 07/00050/MIN (WP/2007/0625/C) to extend the time limit for implementation by two years at Earls Barton Spinney Quarry, application for a sand and gravel quarry with restoration of flood plain habitats and agriculture	No Objection 17/11/10
WP/2007/0625 received 20/09/27	Sand and gravel extraction with restoration to flood plain habitats and agriculture.	Approved 20/03/08
WP/2003/0030 received 15/01/03	Dutch Barn	Approved 10/02/03
WP/1996/0256 received 14/06/96	Replacement dwelling	Approved 14/06/96
WP/1996/0084 received 28/02/96	Demolition and clearance	Approved 16/10/66
BW/1986/0520 received 14/05/86	Erection of bungalow & agricultural buildings	Approved 26/06/86
BW/1984/0275 received 26/03/84	Flood storage reservoir with overflow/ control structures OP043,0052,0061 off A4500 Wilby OP 7536 Earls Barton	Approved 05/07/85
BW/1976/0971 received 29/12/76	Proposed repositioning of vehicular access to farm	Approved 22/05/77
WR/1955/0044 received 29/04/55	Garage and conservatory	Approved 10/05/55
WR/1953/0061 received 25/06/53	Garage	Approved 08/07/53

Table A.6: Green Hill E

Reference and Application Date	Description	Decision and Date
NW/24/00649/EXT received 05/11/24	Solar generating station and energy storage project	

Reference and Application Date	Description	Decision and Date
NW/24/00425/EXT received 26/07/24	Environmental Impact Assessment (EIA) Scoping Notification and Consultation from the Planning Inspectorate (PINS) for a Nationally Significant Infrastructure Project (NSIP) (solar farm)	EIA scoping opinion issued 22/08/24
WP/18/00079/CND received 05/02/18	Details submitted pursuant to conditions 2 (external materials), 3 (landscape scheme) and 4 (archaeology) of planning permission ref: WP/15/00010/FUL	Part approved 21/08/18
WP/15/00010/FUL received 09/001/15	Erection of agricultural building and new vehicular access	Approved 25/02/15
BW/1985/1025 received 15/10/85	Renewal of planning consent BW/1984/0666/O in order to complete infilling of former quarry with inert waste and restore to agricultural use	Deemed Approved 01/01/85
BW/1984/0666 received 16/08/84	Filling of former quarry with inert material and restoration to agricultural use	Approved 01/01/84
BW/1982/0202 received 22/04/82	100ft high replacement radio tower and associated equipment building	Approved 22/04/82
BW/1977/0818 received 19/10/77	Extension to gas governing installation and erection of security fencing	Approved 01/12/77
BW/1975/0078 received 27/01/75	High voltage overhead electric lines	Approved 01/01/75
WR/1971/0010 received 18/01/71	75 ft radio tower	Approved 11/03/71
WR/1970/0202 received 24/09/70	Extension to site	Approved 09/12/70
WR/1967/0042 received 06/09/67	Radio tower	Withdrawn
WR/1966/0009 received 13/01/66	Installation of pipes & valves	Approved 16/03/66

Table A.7: Green Hill F

Reference and Application Date	Description	Decision and Date
NW/21/00124/AMD received 05/02/21	Non-material amendment to planning permission reference WP/2013/0393/F - Amendments to the proposed materials used and change of 1no. door/window.	Approved 29/04/21
WP/20/00323/FUL received 08/06/20	Single storey rear extension	Approved 03/08/20

Reference and Application Date	Description	Decision and Date
WP/19/00455/FUL	Two storey and single-storey rear extension and single storey side extension with first floor balcony above	
WP/19/00049/FUL received 30/01/19	Removal of existing conservatory and erection of a single storey rear extension	Approved 13/03/19
WP/18/00735/FUL received 28/11/18	Single storey rear extension. Removal of 5 bar vehicular and pedestrian gates to be replaced with a pair of 2m high metal gates, raised brick piers and close boarded fencing to be set 2m further back from the highway. Alterations to ground floor windows in the west side elevation to form french doors	Approved 21/01/19
WP/18/00097/FUL received 09/02/18	Conversion of outbuilding bar into an annex for living accommodation. Living and cooking facilities will be within the main dwelling	Approved 05/04/18
WP/17/00250/CRA received 18/04/17	Variation of Condition 13.1 (Restoration and Aftercare Scheme) of planning permission ref. no. APP/K2800/97/287275 (NCC ref. no. WP/96/340C) for the amendment of the habitat layout, and the retention of the site access and access road	Approved 02/05/17
WP/15/00595/FUL received 29/09/15	New detached garage	Approved 29/10/15
WP/2013/0393 received 30/07/13	Extension to an existing outbuilding to create machinery stores, garages, games room and a study.	Approved 02/10/13
WP/2013/0297 received 13/06/13	Removal of hedgerow	24/07/13
WP/2012/0392 received 28/08/12	New cricket training facility hall, along with a new cricket pavilion. Existing land around the development will be converted into 2 no. cricket playing pitches - amended plan and additional information.	Approved 19/12/12
WP/2009/0114 received 25/03/09	Rebuild 300m of 11kV overhead line off line and install underground cable	Approved 20/05/09
WP/2002/0046 received 21/01/02	Proposed extension to form 'granny' flat & garage	Approved 18/02/02
WP/1998/0347 received 21/07/98	Sand & gravel extraction, restoration at low level to agriculture, construction of site access to the A509 with sales from site together with transport of as-raised material by road for processing at Pioneer's Earls Barton plant site- Church Farm Bozeat	Refused 02/10/98
WP/1996/0340 received 02/08/96	Sand and gravel extraction at low level to agriculture, construction of site access to the A509 with sales from site together with transport of as-raised material	Approved 01/11/99

Reference and Application Date	Description	Decision and Date
	by road for processing at Pioneer's Earls Barton plant site	
BW/1986/0225 received 01/01/86	Erection of 11KV overhead line on wooden poles	Approved 01/01/86
BW/1985/0500 received 20/05/85	Detached house and double garage	Approved 01/01/85
BW/1984/0006 received 05/01/84	Detached house and double garage	Approved 01/01/84
BW/1976/0112 received 17/02/76	Erection of three detached houses with garages and carport and access road.	Approved 31/03/76
WR/1973/0150 received 18/04/73	Three dwellings	Approved 06/06/73
WR/1952/0025 received 26/03/52	Proposed two covered stock yards, food store and Dutch barn	Approved 14/05/52

A.8: Green Hill G – no relevant planning history found.

Table A.9: Green Hill BESS

Reference and Application Date	Description	Decision and Date
WP/2010/0162 received 22/04/10	Proposed installation of an additional Super Grid Transformer (SGT) at Grendon 400/132kV substation	Permitted Development 05/05/10
WP/2004/0121 received 19/02/04	Infill open barn entrances off courtyard. Rear single storey extension (kitchen and garden room).	Approved 20/04/04
WP/1998/0448 received 30/09/98	Loft conversion/ three projecting dormers to rear facing	Refused 06/10/99
WP/1998/0384 received 17/08/98	Rebuilding of outbuilding/ garage to look as closely as possible to original	Approved 20/10/98
WP/1996/0387 received 03/09/96	Demolish existing barn and attached outhouse and rebuild as original	Approved 16/10/96
WP/1991/0442 received 15/10/91	Demolition of outbuildings	Approved 27/11/91
WP/1991/0075 received 14/02/91	Demolition of former farm barns	Refused 17/04/91
WP/1991/0074 received 11/02/91	Erection of new buildings and change of use barns for accommodation and construction of private swimming pool	Refused 17/04/91

Reference and Application Date	Description	Decision and Date
BW/1989/0888 received 21/08/89	Barn and stable block.	Approved 28/09/89
WR/1969/0037 received 17/02/69	Three garages	Approved 09/04/69
WR/1967/0058 received 30/03/67	Access and equipment store	Approved 10/05/67
WP/1996/0388 received 03/09/96	Demolish existing barn	Approved 16/10/96
WR/1966/0170 received	Caravan site for construction workers	Approved 21/09/66
WR/1965/0088 received 04/02/65	Electricity sub-station	Approved 19/03/65

Planning Applications within 500 m of the Sites

The planning applications listed below exclude householder planning applications and related applications (such as non-material or minor amendments, discharge of conditions) and exclude all applications received before 2014. Applications may be listed in more than one table if they are located within 500 m of multiple Sites.

Table A.1 and A.2: Green Hill A

Reference and Application Date	Description	Decision and Date
WND/2022/0828 received	Construction of two storage barns and ménage area	Approved 22/09/23
WND/2022/0198 received 28/02/22	Change of use of outbuilding from equine education and training to equine and leisure accommodation (retrospective)	Approved 24/05/22
DA/2020/0712 received 24/08/20	Extension to agricultural building (part retrospective)	Approved 17/11/20
PD/2020/0071 received 09/11/20	Prior approval for change of use of agricultural building to dwelling (Class Q, A and B)	Prior approval granted 21/12/20
PD/2020/0011 received 25/03/20	Prior approval for change of use of agricultural building to use as a joinery workshop	Prior approval refused 20/05/20
DA/2019/0512 received 17/06/19	Construction of farm access and internal farm track	Approved 15/08/19
DA/2018/0744 received 24/08/18	Variation of Condition 4 of planning permission DA/2017/1015 (Construction of hay store and managers accommodation and formation of parking areas) to allow for the dwelling to be sold on the open market with occupancy restriction.	Approved 18/10/18

Reference and Application Date	Description	Decision and Date
NMA/2018/0067 29/08/18	Non material amendment to application DA/2016/0523 (Conversion of existing equestrian buildings into teaching space, ancillary accommodation and manager's flat. Erection of hay barn, stables, garage, offices and formation of parking area) West elevation change timber clad boarding to brickwork. Change wooden windows to UPVC colour Irish Oak	Approved 07/05/19
DA/2017/1015 received 13/10/17	Construction of hay store and manager's accommodation and formation of parking areas (resubmission of application DA/2016/0523)	Approved 07/03/18
DA/2017/0739 received 24/07/17	Conversion and extension of existing building to dwelling. Construction of detached garage. Demolition of existing greenhouse and associated works.	Approved 03/11/17
DA/2017/0488 received 28/04/17	New grain store	Approved 22/08/17
PD/2017/0052 received 04/10/17	Prior approval for change of use of agricultural building to dwelling (Class Q(B))	Prior approval granted 21/12/17
NMA/2016/0078	Non material amendment to application DA/2016/0523 to relocate teaching space to make fenestration/roof changes to the originally approved plans.	Approved 12/12/16
DA/2016/0523 received 27/05/16	Conversion of existing equestrian buildings into teaching space, ancillary accommodation and manager's flat. Erection of hay barn, stables, garage, offices and formation of parking area	Approved 23/09/16
PD/2016/0084 received 14/12/16	Prior approval for change of use of agricultural building to dwelling (Class Q(A))	Prior approval granted 07/02/17

Table C.1: Cable Corridor between Green Hill A and A.2

Reference and Application Date	Description	Decision and Date
2024/1309/FULL received 05/02/25	Demolition of existing dwelling and erection of a replacement dwelling and associated works, including refuse and cycle storage and landscaping	Pending decision date 30/03/25
2024/4030/S73 received 16/08/24	Variation of Condition 5 of approved DA/2015/0848 [Demolition of existing bungalow and construction of two storey dwelling] to regularise applicants continued occupation	Approved 30/09/24
2023/5961/MAF	Proposed enlargement of existing attenuation pond (retrospective)	Currently invalid

Reference and Application Date	Description	Decision and Date
WND/2022/1066 received 22/11/22	Change of use of land and buildings from mixed residential and equestrian use to use as showman's family quarters	Approved 02/11/23
WND/2022/0794 received 31/08/22	Construction of equestrian building and manege (revised scheme).	Approved 22/08/23
WND/2022/0524 received 15/06/22	Construction of new access, opening and parking area to serve existing dwelling	Approved 04/10/22
WND/2021/0658 received 29/09/21	Replacement of existing mobile home with new mobile home	Approved 14/12/21
DA/2020/0507 received 25/06/20	Proposed pet crematorium and associated offices	No observation 29/07/20
DA/2020/0124 received 10/02/20	Construction of building for storage of ground maintenance equipment (resubmission)	Approved 11/06/20
DA/2018/0599 received 11/07/18	Variation of planning conditions 5, 7, 11 & 13 of planning permission DA/2014/0694 relating to pre commencement conditions for construction management, security details, soil enhancement and landscaping	Approved 13/03/19
DA/2018/0524 received 14/06/18	Replacement of mobile home with new mobile home	Approved 02/10/18

Table A.3: Green Hill B

Reference and Application Date	Description	Decision and Date
WND/2023/0092 received 18/1122	Construction of agricultural building	Approved 21/03/23
WND/2022/0279 received 28/03/22	Construction of single storey rear extension	Approved 14/07/22
WND/2021/0928 received 15/12/21	Variation of condition 2 of planning permission DA/2020/0487 (Construction of detached dwelling with garage & stables together with formation of access drive, hard & soft landscaping), to omit the stable block & reposition the garage, add two additional bedrooms within the previous garage area, addition of a gym & plant room, revision to the drive & repositioning of the garden area	Approved 29/03/22

Reference and Application Date	Description	Decision and Date
WNPD/2021/0007 received 19/04/21	Construction of agricultural building for use as store and workshop	Refused 14/05/21
DA/2021/0100 received 26/01/21	Change of use to glamping site including one log cabin, three shepherds huts with toilet/shower/kitchen units, parking, fencing and passing bay to access lane.	Approval 20/04/21
DA/2020/0487 received 22/06/20	Construction of detached dwelling with garage and stables, together with formation of access drive, hard and soft landscaping.	Approval 28/09/20

Table A.4: Green Hill C

Reference and Application Date	Description	Decision and Date
NW/21/00898/VAR received 13/11/21	Application for the removal of condition 17 (the 2,485 square metre event building (Building C) shall be used for D2 leisure purposes which shall include but not be limited to ice skating, roller skating, events based on horticulture, cookery and food and shall not be used for retail sales of plants or goods or for the display for sale of plants or goods) under planning permission reference WP/20/00272/FUL. To allow garden furniture/outdoor living goods sales in approved Building C	Approved 16/12/21
NW/21/01127/CND received 24/12/21	Approval of details reserved by condition 3 (Written Scheme of Investigation) of planning permission reference NW/21/00233/FUL	Approval 18/02/22
NW/21/00587/CND received	Details submitted pursuant to condition 4 (external materials) of planning permission reference NW/21/00233/FUL	Part discharged 24/08/21
NW/21/00586/VAR received 07/07/21	Removal of condition 5 of planning permission reference NW/21/00233/FUL. Condition 5 states "No development above slab level shall take place until a scheme and timetable detailing the provision of fire hydrants, sprinkler systems and their associated infrastructure has been submitted to and approved in writing by the local planning authority. The fire hydrants, sprinkler systems and associated infrastructure shall thereafter be provided in accordance with the approved scheme and timetable"	Approved 24/08/21
NW/21/00444/AMD received 11/05/21	Non-material amendment to planning permission reference WP/20/00272/FUL canopy roof amendment, the relocation of existing Biomass boiler	Approved 28/05/21

Reference and Application Date	Description	Decision and Date
	and plant room, 8 external condensers and external grills	
NW/21/00443/CND received 11/05/21	Approval of details reserved by conditions 11 (details of fire hydrant); 16 (details of external lighting) and condition 19 (details of extraction of odour and fumes) of planning permission reference WP/20/00272/FUL.	Part discharged 05/11/21
NW/21/00233/FUL received 10/03/21	The erection of a new grain store with a footprint of 900 square metres (30 metres x 30 metres) and an eaves height of 6 metres and ridge height 8.208 metres	Approved 25/05/21
WP/20/00607/CND received 24/09/20	Details submitted pursuant to Conditions 12 (details of the discharge of surface water) and 13 (a detailed scheme for the ownership and maintenance for every element of the surface water drainage system proposed on the site for each phase) of planning permission reference WP/20/00272/FUL	Part discharged 07/04/21
WP/20/00568/CND received 14/09/20	Details submitted pursuant to Condition 4 (Construction and Environmental Management Plan) and Condition 7 (Construction Method Statement) of planning permission reference WP/20/00272/FUL	Part discharged 13/10/20
WP/20/00272/FUL received 06/05/20	Demolition of 3,970m2 of existing buildings, erection of 4,200m2 new buildings to replace existing facilities on site which include kitchen, refrigerated store, plant room/recycling store, dry goods store, staff room, WCs, offices, totalling 1311sqm plus a 344sqm extension to the existing restaurant seating area and a 2,485sqm event building with 12sqm canopy, relocation of biomass boilers 48sqm, extension of open sales area and car park, erection of water storage tank(s). (No additional retail floor space).	Approved 13/08/20
WP/16/00574/FUL 20/09/16	Construction of general purpose agricultural building	Approved 14/12/16
WP/15/00016/FUL received 13/01/15	Conversion of an unused barn into a two bedroom house	Approved 13/03/15

Table A.5: Green Hill D

Reference and Application Date	Description	Decision and Date
NW/22/00773/FUL received 02/11/22	Installation of a 30 metre x 50 metre all weather equestrian arena with 6 no. floodlights and post and rail timber fencing on land formerly used as open agricultural storage	Approved 17/01/23

Reference and Application Date	Description	Decision and Date
WP/16/00356/FUL received 13/06/16	Construction of affordable and market homes including access roads and services	Refused 12/10/16
WP/15/00016/FUL received 13/01/15	Conversion of an unused barn into a two bedroom house	Approved 13/03/15

Table A.6: Green Hill E

Reference and Application Date	Description	Decision and Date
NW/25/00042/CND received 29/01/25	Approval of details reserved by condition 20 (Construction Environmental Management Plan) of planning permission reference NW/22/00550/FUL	Part Discharged 28/02/25
NW/24/00692/VAR received 27/11/24	Application for Variation of condition 2 (Approved plans/details) of planning permission reference NW/22/00550/FUL this application seeks to substitute originally approved plans with the amended plans in relation to the proposed pavilion building only being delivered within Phase 1 of the wider development of this site.	Pending
NW/23/00221/FUL received 17/04/23	Full planning permission for the demolition of existing garages and erection of 2 semi-detached dwellings (Use Class C3) including access, parking and landscaping.	Refused 12/07/23
NW/22/00730/OUT received 13/10/22	An outline application for up to 48 affordable dwellings, including means of access, attenuation basin, public open space, landscaping and other associated infrastructure	Refused 19/12/22
NW/22/00550/FUL received 01/08/22	Erection of sports hall, pavilion and store, installation of cricket and football pitches (including allowance for 3G surfacing on main pitch and training pitch) with floodlights, cricket nets and outdoor gym with associated parking and landscaping works (revised scheme to planning permission reference WP/20/00150/FUL)	Approved 19/04/24
NW/22/00345/CND	(See below entry)	
NW/22/00344/CND received 19/05/22	Approval of details reserved by conditions 3 (schedule of external finish materials, including the proposed stone, mortar specification and laying style, brick and bond style, fascias and lintels) 4 (schedule of drawings that show details of proposed window, rooflights, doors, and external balustrades in section and elevation at scales between 1:20 and 1:1 as appropriate, showing details of glazing type, framing, glazing bars, cills, ironmongery, and finish colour) and 5 (details of the extraction vent and flue,	Part Discharged 07/07/22

Reference and Application Date	Description	Decision and Date
	including colour) of listed building consent reference NW/21/01042/LBC	
NW/21/01048/CND received 01/12/21	Approval of details reserved by conditions 5 (full details of the proposed traffic management scheme), 11 (details of noise assessment), 17 (method statement for reptiles), 18 (method statement for soft-felling tree T1 as identified in Bat Survey) and 24 (detailed assessment of ground conditions) of planning permission reference WP/20/00150/FUL	Withdrawn 02/09/22
NW/21/00628/CND received 16/07/21	Details submitted pursuant to condition 12 (Noise report) of planning permission ref: WP/20/00150/FUL	Withdrawn 02/09/22
NW/21/00654/VAR 23/07/21	Application to vary conditions 2 (substitution of approved plans) 23 (details of the design and specification of the ball stop mitigation) of planning permission reference WP/20/00150/FUL. In relation to condition 2 seeking to replace Boundary Risk Assessment by Labosport Ltd (ref. LSUK.19.0821) with: Boundary Risk Assessment by Labosport Ltd. (ref. LSUK.21-0624) and replace drawing number 1013-102-P7 - (Fencing Layout Plan) with: drawing number 1013-SAP-V1-XX-DR-A-10108-SO Rev 02 (Proposed Site Plan - Ball Strike Netting & Signage Plan). And amend condition 23 to state 'The development hereby approved shall be carried out in accordance with the approved 'Boundary Risk Assessment by Labosport Ltd. (Ref. LSUK.21-0624)' and 'Proposed Site Plan-Ball Strike Netting & Signage Plan (Drawing No. 1013-SAP-V1-XX-DR-A-10108-SO rev 02)'. The approved details shall be retained and maintained thereafter.	Withdrawn 02/09/22
NW/21/00432/CND received 21/05/21	Details submitted pursuant Condition 12 - (Noise Management Plan for Use of Cricket Pitch) and Condition 23 - (Management and Maintenance Plan for Use of Ball Strike Netting to Cricket Pitch) of planning permission reference WP/20/00150/FUL	Withdrawn 05/07/21
WP/20/00150/FUL received 05/03/20	Erection of sports hall, pavilion and store, installation of cricket and football pitches (including allowance for either grass or 3G on main pitch and training pitch) with floodlights, cricket nets and outdoor gym with associated parking and landscaping works - re-submission	Approved 10/09/20
WP/18/00793/FUL received 19/12/18	Conversion of existing agricultural barns to form three new residential dwellings with associated works including parking, the formation of private amenity space, boundary treatments and sheds for cycle storage	Approved 14/02/19

Reference and Application Date	Description	Decision and Date
WP/16/00758/REM received 05/12/16	Application for approval of reserved matters to amend the house types and layout of the approved scheme. All other matters in terms of affordable home provision, ecology, ground investigation and highways remain materially the same.	Approved 24/02/17
WP/16/00332/CND received 01/06/16	Details submitted pursuant to conditions 4 (ERA), 6 (archaeology), 9 (protected species), 10 (protection of trees), 11 (travel plan) and 13 (surface water drainage) of planning permission ref: WP/2013/0510. Drainage Details.	Part discharged 31/01/18
WP/16/00150/CND received 16/03/16	Details submitted pursuant to condition 7 (sports area general arrangement plan) of planning permission ref: WP/2013/0510	Discharged 06/05/16
WP/16/00048/FUL received 01/02/16	Change of use from allotment land in order to extend Earls Barton cemetery	Approved 09/08/16
WP/15/00137/REM received 09/03/15	Reserved matters application pursuant to conditions 1 and 2 of planning permission ref: WP/2013/0510 to consider the appearance, landscaping, layout and scale of the residential development of up to 280 dwellings, associated roads, access and parking. Details submitted to discharge conditions 4 (environmental risk assessment) and 11 (travel plan).	Approved 05/08/15
WP/16/00758/REM received 05/12/16	Application for approval of reserved matters to amend the house types and layout of the approved scheme. All other matters in terms of affordable home provision, ecology, ground investigation and highways remain materially the same.	Approved 24/02/17
WP/15/00010/FUL received 09/01/15	Erection of agricultural building and new vehicular access	Approved 25/02/15

Table A.7: Green Hill F

Reference and Application Date	Description	Decision and Date
NW/21/00946/FUL received 28/10/22	Change of use from C3 residential house to C1 guest house containing 5 bedrooms	Approved 18/01/22
NW/21/00582/FUL received 06/07/21	Demolition of existing dwelling (retrospective) and erection of dormer bungalow with a conservatory to rear	Approved 23/08/21
NW/21/00391/FUL received 30/04/21	Change of use of pool building ancillary to existing dwellinghouse to provision of spa service (Class E(D)) (retrospective). Re-submission following a	Declined to determine by Authority 17/06/21

Reference and Application Date	Description	Decision and Date
	refusal of planning permission reference WP/20/00755/FUL	
WP/20/00755/FUL received 12/11/20	Change of use of pool building from ancillary to Class E(d) indoor sport, recreation or fitness. Provision of spa service (retrospective)	Refused 04/03/21
WP/17/00250/CRA received 18/04/17	Variation of Condition 13.1 (Restoration and Aftercare Scheme) of planning permission ref. no. APP/K2800/97/287275 (NCC ref. no. WP/96/340C) for the amendment of the habitat layout, and the retention of the site access and access road	Approved by NCC 30/06/17

Table A.8: Green Hill G

Reference and Application Date	Description	Decision and Date
24/00281/FUL received 11/03/24	Change of use of farmyard and agricultural buildings to commercial storage use (use class B8) including alterations to elevations; change of use of agricultural building to workshop (use class B2); change of use of bungalow to meeting room/office (use class E(g)(i)); demolition of farmhouse, flat and remaining agricultural buildings, garages and tank; erection of an office building (use class E(g)(i)); creation of associated attenuation pond and drainage operations in agricultural field; and hard and soft landscaping for the development including internal roads and parking areas	Refused 20/06/24
23/01639/FUL received 15/08/23	Erection of a Bakery Food-on-the-Go Facility (use class E) on a temporary basis for 2 Years along with formation of associated parking spaces and pedestrian routes with bollards.	Approved 28/11/23
23/01133/PRIOR received 12/05/23	Prior Approval for change of use of Agricultural Buildings to a flexible commercial use (B1 or B8)	Prior Approval Not Required 06/07/23
23/00379/PRIOR received 14/02/23	Prior approval for change of use of an agricultural building to a flexible commercial use (B1, B8)	Prior Approval Required and Refused 06/04/23
22/00893/PANAGC received 07/04/22	Application to determine if prior approval is required for change of use of agricultural building to larger dwelling house.	Prior Approval Required and Approved 01/06/22
21/01755/PANAGC – N/A	Application to determine if prior approval is required for change of use of agricultural building to larger dwelling house.	Prior Approved required and refused 28/07/21

Reference and Application Date	Description	Decision and Date
20/00587/FUL – N/A	Demolition of existing shop, car wash and LPG compound and construction of new shop incorporating drive thru, car wash, service compound, one new dispensing pump island, 4no. EV charging bays, additional car parking, cycle shelter with 5 No. stands and ancillary external works (Re-submission of 20/00072/FUL).	Approved 23/04/20
19/01346/REM – N/A	Reserved matters application for the erection of a single detached dwelling (revised plans/access)	Approved 10/09/19
18/02597/OUT – N/A	An outline planning application with all matters reserved, for the erection of a single detached dwelling	Approved 28/01/19
18/00091/FUL – N/A	Erection of replacement agricultural barn	Approved 13/09/18
16/02602/FUL – N/A	A new purpose built stable block for the livery business on site	Withdrawn 22/12/16
17/00500/FUL – N/A	A new purpose built stable building and new menage for the existing livery business and the conversion and extension of existing stable buildings into a three bedroom dwelling	Approved 08/05/17
08/02118/FULEIS – N/A	Construct a wind farm development comprising 3 wind turbines up to 125m height to blade tip and ancillary equipment, access tracks and anemometry mast, in conjunction with planning applications to Bedford borough council for 6 turbines and access tracks and the borough of Wellingborough for 3 turbines, substation, construction compound, access tracks and site access as part of a single wind farm of 12 turbines for an operational period of 25 years	Appeal against non-determination – appeal allowed 20/12/13

*N/A – received date not available.

Table A.9: Green Hill BESS

Reference and Application Date	Description	Decision and Date
WP/2010/0162 received 22/04/10	Proposed installation of an additional Super Grid Transformer (SGT) at Grendon 400/132kV substation	Permitted Development 05/05/10
WP/2004/0121 received 19/02/04	Infill open barn entrances off courtyard. Rear single storey extension (kitchen and garden room).	Approved 20/04/04
WP/1998/0448 received 30/09/98	Loft conversion/ three projecting dormers to rear facing	Refused 06/10/99

Reference and Application Date	Description	Decision and Date
WP/1998/0384 received 17/08/98	Rebuilding of outbuilding/ garage to look as closely as possible to original	Approved 20/10/98
WP/1996/0387 received 03/09/96	Demolish existing barn and attached outhouse and rebuild as original	Approved 16/10/96
WP/1991/0442 received 15/10/91	Demolition of outbuildings	Approved 27/11/91
WP/1991/0075 received 14/02/91	Demolition of former farm barns	Refused 17/04/91
WP/1991/0074 received 11/02/91	Erection of new buildings and change of use barns for accommodation and construction of private swimming pool	Refused 17/04/91
BW/1989/0888 received 21/08/89	Barn and stable block.	Approved 28/09/89
WR/1969/0037 received 17/02/69	Three garages	Approved 09/04/69
WR/1967/0058 received 30/03/67	Access and equipment store	Approved 10/05/67
WP/1996/0388 received 03/09/96	Demolish existing barn	Approved 16/10/96
WR/1966/0170 received	Caravan site for construction workers	Approved 21/09/66
WR/1965/0088 received 04/02/65	Electricity sub-station	Approved 19/03/65

Appendix B: Flood Risk Assessment Sequential Test and Exception Test

Green Hill Solar Farm

EN010170

Planning Statement – Appendix B: Flood Risk Assessment Sequential Test and Exception Test Revision C

Prepared by: Lanpro

Date: March 2026

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APFP Regulation 5(2)(q)

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 6

Planning Statement

Appendix B: Flood Risk Assessment Sequential Test and Exception Test Revision C

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Revision	Date	Prepared by	Approved by
Original	23/05/2025	AV	TC
Revision A	19/11/2025	AR	JC
Revision B	14/01/2026	AR	JC

1 Introduction

1.1.1 Green Hill Solar Farm Limited (the "Applicant") has prepared this Sequential Test and Exception Test Report (the "Statement") as part of an application for a Development Consent Order ("DCO") to construct, operate, maintain and decommission the Green Hill Solar Farm (the "Scheme").

1.1.2 The Scheme comprises a number of land parcels (the 'Site' or 'Sites') described as Green Hill A, Green Hill A.2, Green Hill B, Green Hill C, Green Hill D, Green Hill E, Green Hill F, Green Hill G, and Green Hill BESS for the solar arrays, grid connection infrastructure and Energy Storage; and the Cable Route Corridors. The Sites are located to the northeast and southeast of Northampton, and the west and south of Wellingborough. See the Site Location Plan **[APP-006]** for the Site locations.

1.1.3 The Scheme is described in full in Chapter 4 of the Environmental Statement (ES), Scheme Description **[EX6/GH6.2.4_B]** supporting the application.

1.1.4 The DCO application is for the construction, operation (including maintenance) and decommissioning of the Scheme. The Scheme consists of a solar photovoltaic (PV) array electricity generating station, energy storage facility and grid connection to the national electricity transmission network (NETS). The Scheme is located within the administrative boundaries of North Northamptonshire and West Northamptonshire; with Green Hill G and part of the Cable Route Corridor located within the administrative boundary of Milton Keynes City.

1.1.5 The vast majority of the Order Limits are located within Flood Zone 1, with small sections of the Sites located within Flood Zones 2 and 3. These include small parts of Green Hill D, Green Hill E, Green Hill F, Green Hill BESS, which are in Flood Zones 2 and 3. The majority of the Cable Route Corridor is in Flood Zone 1. The section of the cable within the vicinity of the river Nene, as well as small sections to the south of Green Hill BESS and to the north of Green Hill C are situated within Flood Zones 2 and 3. See Appendices 10.1 to 10.10 **[REP5-021 to REP5-031]** of ES Chapter 10: Hydrology, Flood Risk and Drainage **[EX6/ GH6.2.10_C]**, for the detailed extent of Flood Zone 2 and 3 coverage across each of the Sites and the Cable Route Corridor.

1.1.6 Under Annex 3: Flood risk vulnerability classification of the National Planning Policy Framework (NPPF) (Ref.3) the Scheme as a solar farm is classified as '*essential infrastructure*'.

1.1.7 Overarching National Policy Statement for Energy (November 2023) (NPS EN-1) (Ref.1) states that '*Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall*' (Para 5.8.7).

1.1.8 Paragraph 5.8.9 of NPS EN-1 states that "*If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable*

development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied…".

1.1.9 The Scheme is therefore subject to the 'Sequential Test' and the 'Exception Test'; as outlined in NPS EN-1 and the NPPF as it is partially located within Flood Zone 2 and 3 areas.

1.1.10 The Scheme would generate large amounts of electricity from a renewable source and so it would assist the Government in meeting its targets to decarbonise our electricity supply and reduce overall carbon emissions.

1.1.11 The Government expects large scale solar generation to make an important contribution to achieving its objectives for the UK's power system which are to ensure the supply of energy always remains secure, reliable, affordable, and enables the UK to meet its carbon emission reduction commitments. These include the achievement of net zero carbon emissions by 2050 and delivery of carbon budgets in the intervening years. Further details are set out in the Statement of Need **[APP-559].**

2 Policy and Guidance

2.1 Overview

2.1.1 National Policy Statements (NPSs) for energy infrastructure relevant to the Scheme came into force in January 2024. Under Section 104 of the Planning Act 2008, the Planning Act 2008, the Secretary of State must have regard to relevant NPSs when deciding an application for an NSIP and must decide the application in accordance with the relevant NPSs unless a number of exceptions apply, including that they are satisfied that the adverse impact of the proposed development would outweigh its benefits.

2.1.2 In respect of flood risk, NPS EN-1 signposts the reader to the NPPF and the Planning Policy Guidance (PPG).

2.2 NPS EN-1

2.2.1 NPS EN-1 paragraph 5.8.7 confirms that if there are no 'reasonably available sites' in Flood Zone 1, as demonstrated by a Sequential Test, then projects can 'exceptionally' be located in flood risk areas.

2.2.2 NPS EN-1 then goes on, in paragraphs 5.8.8-5.8.11, to set out when and how the Exception Test may be applied:

"If, following application of the Sequential Test[213], it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied as defined in https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2.[214] The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.

"The Exception Test[215] is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate.

"Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that:

"• the project would provide wider sustainability benefits to the community[216] that outweigh flood risk; and

"• the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall."

2.2.3 The NPSs recognise that the proximity to an available grid connection is a key determinant in the selection of sites for solar photovoltaic schemes. NPS EN-3

paragraphs 2.10.24 and 2.10.25 state that, for connections to either the distribution or the transmission network:

"the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.

"To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity."

2.3 National Planning Policy Framework (NPPF)

2.3.1 The NPPF is clear that the '*aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding from any source*' (paragraph 174), whilst for a site to pass the Exception Test, '*it should be demonstrated that:*

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.' (paragraph 178).

2.3.2 Both of the above elements of the Exception Test should be satisfied for development to pass the test (paragraph 179).

2.3.3 Paragraph 181 of the NPPF states that '*Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

2.4 National Planning Policy Guidance (PPG)

The Sequential Approach to the location of development

2.4.1 Paragraph 024 Reference ID: 7-024-20220825 of the PPG states the following in relation to the Sequential Test:

'The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to

locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- *Within medium risk areas; and*
- *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.*

Initially, the presence of existing flood risk management infrastructure should be ignored, as the long-term funding, maintenance and renewal of this infrastructure is uncertain. Climate change will also impact upon the level of protection infrastructure will offer throughout the lifetime of development. The Sequential Test should then consider the spatial variation of risk within medium and then high flood risk areas to identify the lowest risk sites in these areas, ignoring the presence of flood risk management infrastructure.

It may then be appropriate to consider the role of flood risk management infrastructure in the variation of risk within high and medium flood risk areas. In doing so, information such as flood depth, velocity, hazard and speed-of-onset in the event of flood risk management infrastructure exceedance and/or failure, should be considered as appropriate. Information on the probability of flood defence failure is unsuitable for planning purposes given the substantial uncertainties involved in such long-term predictions.'

2.4.2 Paragraph 027 Reference ID: 7-027-20220825 states that 'the area to apply the test will be defined by local circumstances relating to the catchment area for the type of development proposed'. The same Paragraph also notes that 'For nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary'.

2.4.3 The definition of 'reasonably available sites' is provided in Paragraph /028 Reference ID: 7-028-20220825: 'those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development'. They can include a 'series of smaller sites' if capable of accommodating the proposed development. Site not in the ownership of the applicant must be considered.

2.4.4 Paragraph 079 Reference ID: 7-079-20220825 includes Table 2: Flood risk vulnerability and flood zone 'incompatibility' which summarised the position of Para. 024 reference ID: 7-24-20220825, as follows:

Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✔	✔	✔	✔	✔
Zone 2	✔	Exception Test required	✔	✔	✔
Zone 3a †	Exception Test required †	X	Exception Test required	✔	✔
Zone 3b *	Exception Test required *	X	X	X	✔ *

Key:

✔ Exception test is not required

X Development should not be permitted

Notes to table 2:

- This table does not show the application of the Sequential Test which should be applied first to guide development to the lowest flood risk areas; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;
- The Sequential and Exception Tests do not need to be applied to those developments set out in National Planning Policy Framework footnote 56. The Sequential and Exception Tests should be applied to 'major' and 'non major' development;
- Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.

"†" In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

"*" In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

2.4.5 Para. 023 Reference ID: 7-023-20220825 states that '*even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so, and developers do not waste resources promoting proposals which would fail to satisfy the test*.'

2.4.6 Para. 028 Reference ID: 7-028-20220825 described that "Reasonably Available Sites" '*are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.*'

The Exception Test

2.4.7 Para. 031 Reference ID: 7-031-20220825 largely reflects paragraph 164 of the NPPF (see above) with regards to a demonstration of wider sustainability benefits and a reduction in overall flood risk.

2.4.8 Para. 035 Reference ID: 7-035-20220825 states that *'the Exception Test should only be applied when following application of the Sequential Test, it has been demonstrated that it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives). The applicant will need to provide the local planning authority with evidence to demonstrate how both elements of the Exception Test will be satisfied.'*

2.4.9 Para. 036 Reference ID: 7-036-20220825 provides guidance and exemplary avenues in which Applicants can look to incorporate and ultimately demonstrate that wider sustainability benefits to the community would outweigh flood risk. The paragraph states in full that:

'Local planning authorities need to set their own criteria for this assessment, having regard to the objectives of their Plan's Sustainability Appraisal framework, and provide advice which will enable applicants to provide relevant and proportionate evidence.

Examples of wider sustainability benefits to the community could include:

- *The re-use of suitable brownfield land as part of a local regeneration scheme,;*
- *An overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure;*
- *The provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure, significantly exceeding National Planning Policy Framework policy requirements for Sustainable Drainage Systems;*

Identified sustainability benefits need to be balanced against any associated flood risks, informed by the site-specific flood risk assessment. The impacts of flood risk on social, economic and environmental factors should be considered. Where wider sustainability benefits are absent or where they are outweighed by flood risk, the Exception Test has not been satisfied and the site allocation in the plan should not be made or planning permission should be refused.'

2.4.10 Para. 037 Reference ID: 7-037-20220825 provides guidance on how it can be demonstrated that the proposed Scheme will reduce flood risk overall. The paragraph states:

'Developers should refer to the Strategic Flood Risk Assessments and site-specific Flood Risk Assessments to identify opportunities to reduce flood risk overall and to demonstrate that the measures go beyond just managing the flood risk resulting from the development. Reductions could be achieved, for example by:

- *Incorporating green infrastructure within the layout and form of development to make additional space for the flow and storage of flood water;*
- *Providing Sustainable Drainage Systems, that manage flood risk beyond the proposed site and above the usual standard, such as by removing surface water from existing combined sewers;*
- *Providing or making contributions to flood risk management infrastructure that will provide additional benefits to existing communities and/or by safeguarding the land that would be needed to deliver it.'*

2.5 Local Planning Policy

2.5.1 The following local plan policies require the application of a sequential approach and the use of the Exception Test in line with the methodology set out in NPPF and PPG:

- West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS) (Ref.4) Policy BN7 – Flood Risk
- Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP) (Ref.5) ENV11 – Local Flood Risk Management
- Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP) (Ref.6) Policy FR1 (Managing Flood Risk)

3 The Sequential Test

3.1 Introduction

3.1.1 The methodology for the Sequential Test has sought to identify whether there are any alternative 'reasonably available sites' within search area formed by a 20km radius of the POC at Grendon Substation. A 20km radius from the POC was considered to be suitable by the Applicant as a viable cable connection distance for a solar project of this scale. Further details on the reasons for the 20km radius are set out in ES Chapter 5 Alternatives and Design Evolution **[APP-042]**, supported by ES Appendix 5.1 Site Selection Assessment **[REP1-038]**, including the relevant policy tests set out in the NPSs regarding the site selection process.

3.1.2 Sites were required to meet the following criteria in order to be considered a 'reasonably available site':

- A location within a search area based on a 20km radius from the Grendon Substation. The Applicant has secured a Grid Connection for a development, of the scale proposed at the Grendon Substation;
- National Grid have advised that the grid connection at the Grendon Substation would be available in 2029. Site availability must therefore be compatible with the timings of the construction phase in order to meet the grid export date;
- A geographical extent of approximately 1,100 hectares in total excluding the cable route;
- Potential suitability for large-scale ground mounted solar development when considered against other constraints (excluding sites that are allocated or safeguarded within the Development Plan);
- A location which would reflect a lesser extent of development within areas of Flood Zone 2 and 3; and
- Land holdings being 'reasonably available' for such development subject to land agreements.

3.2 Site Assessment

3.2.1 The process for identifying and assessing potential reasonable alternative sites follows that set out in ES Chapter 5 Alternatives and Design Evolution **[APP-042]**, supported by ES Appendix 5.1 Site Selection Assessment **[REP1-038]**. This includes a five-stage process.

3.2.2 Firstly, following receipt of a grid connection offer at Grendon Substation as the Point of Connection (PoC), the Applicant established an initial search area within a 5km radius. This was extended to 20km, which is a viable cable connection distance for a solar farm of this scale, to allow for the identification of sufficient land options to accommodate the Scheme. The search area is shown in ES Figure 5.1 **[APP-222]**.

3.2.3 In Stage 2, the search area was mapped to exclude all areas subject to environmental and planning constraints (including Best and Most Versatile agricultural land, designated ecological and geological sites, national landscapes, human receptors) as well as land that is technically unsuitable due to topographical features. The constraints mapping is shown in ES Figure 5.2 **[APP-222]**, ES Figure 5.3 **[APP-224]**, ES Figure 5.5 **[APP-226]** and ES Figure 5.6 **[APP-227]**.

3.2.4 In Stage 3, Potential Development Areas (PDAs) within unconstrained areas were identified. An area of approximately 1,100 hectares in total, made up of blocks of land of at least 40 hectares of contiguous land in relative proximity is required. Previously developed (brownfield) sites are shown in ES Figure 5.4 **APP-225]**. No suitable previously developed (brownfield) land larger than the minimum size was identified. No commercial rooftops of sufficient size were identified. No single site of 1,100 hectares was identified.

3.2.5 Two PDAs of groups of smaller sites were identified. PDA 1 is a series of sites around Yardley Hastings and Olney. It has an area of approximately 1,167.5ha. PDA 2 is a series of sites between Higham Ferrers and Bedford. It has an area of approximately 1,112.6ha. These are shown in ES Figure 5.7 **[APP-228]**.

3.2.6 In Stage 4, the identified PDAs were evaluated against planning, environmental and other operational assessment indicators derived from national and local planning and environmental policy objectives and the operational requirements of the Scheme. This included consideration of flood risk. The relevant constraints are shown in ES Figure 5.8 **[APP-229]**, ES Figure 5.9 **[APP-230]**, ES Figure 5.19 **[APP-240]**, ES Figure 5.20 **[APP-241]**, and ES Figure 5.21 **[APP-242]**.

3.2.7 PDA 1 and PDA 2 were assessed to be unsuitable due to the presence of SSSIs, ancient woodlands and heritage assets, as set out in **Table 3.1** and in more detail in Annex E of ES Appendix 5.1 Site Selection Assessment **[REP1-038]**.

3.2.8 In Stage 5, in the absence of suitable PDAs, the criteria for the search was widened to encompass agricultural land of Grades 2 and 3, which included most of land in the search area according to predictive mapping, as shown in ES Figure 5.11 **[APP-232]**. Land agents were contacted to assist in identifying potentially willing landowners with land that met the broader search criteria.

3.2.9 This process resulted in the identification of three further PDAs. PDA 3 is located to the northwest of Wellingborough towards the A14. It has an area of approximately 3,664.64 hectares. PDA 4 is located to the northwest of Irthlingborough. It has an area of approximately 1,132.15 hectares. PDA 5 is located between the village of Mouton and the A428. It has an area of approximately 1,329.02 hectares. These PDAs are shown in ES Figure 5.13 **[APP-234]**.

3.2.10 These three PDAs were evaluated against the same assessment criteria as PDA 1 and 2 at Stage 5. The relevant constraints are shown in ES Figure 5.14

[APP-235], ES Figure 5.15 **[APP-236]**, ES Figure 5.16 **[APP-237]**, ES Figure 5.22 **[APP-243]**, ES Figure 5.23 **[APP-244]** and ES Figure 5.24 **[APP-245].**

3.2.11 As set out in **Table 3.1** and in more detail in Annex E of ES Appendix 5.1 Site Selection Assessment **[REP1-038]**, these PDAs are subject to ecological and heritage constraints that made them unsuitable for a development of the nature of the Scheme. **Table 3.1** also sets out the constraints applicable to the land included within the Scheme.

Table 3.1: List of PDA Sites

Potential Development Area (PDA)	Flood Risk	Planning and Environmental Constraints	Availability	Conclusion
PDA 1 - Yardley Hastings to Olney	A total of 15.87% of the PDA is in flood zone 3.	Sites of Special Scientific Interest (SSSI) and areas of ancient woodland and other existing land uses within the PDA.	Unknown	Not suitable
PDA 2 - Higham Ferrers to Bedford	A total of 0.03% of the PDA is within Flood Zone 3.	Areas of ancient woodland within the PDA. Grade II* listed building within the PDA. Other existing land uses.	Unknown	Not suitable
PDA 3 - A14 to Wellingborough	A total of 2.45% of the PDA is within Flood Zone 3.	Sites of Special Scientific Interest (SSSI) within the PDA. Grade II listed building within the PDA	Identified following land agent enquiry. Assumed to be available.	Not suitable
PDA4 – Irthlingborough	A total of 1.9% of the PDA is within Flood Zone 3.	Site of Special Scientific Interest (SSSI) within the PDA. Three Grade II listed buildings within the PDA. Grade I and Grade II* listed building in close proximity to the PDA.	Identified following land agent enquiry. Assumed to be available.	Not suitable

Potential Development Area (PDA)	Flood Risk	Planning and Environmental Constraints	Availability	Conclusion
PDA 5 - A428 to Moulton	A total of 1.75% of the PDA is within Flood Zone 3.	Seven Grade II listed buildings within the PDA	Identified following land agent enquiry. Assumed to be available.	Not suitable
The Scheme	A total of 4.27% of the solar Sites of Scheme is within Flood Zone 3.	BMV Grade Land	Available.	Suitable and available.

3.2.12 Based on the above, it was considered that the proposed Sites for the Scheme were the most suitable locations within the area of search and there were no reasonably available sites in areas of lower flood risk.

3.3 Limitations of the Sequential Test

3.3.1 It is accepted that any ranking and scoring methodology based on the high-level strategic assessment must take into account a number of assumptions, given that:

- It is not always possible to secure a complete and comprehensive understanding of the land ownership position; without which, full technical surveys and detailed design and mitigation assessments cannot be undertaken in the that timeframe (or at all); and
- As a consequence, this necessitates a high reliance on professional judgement, for example, with regard to views, screening and the impact of site design constraints and potential mitigation measures, which in turn impact on site capacity and viability (and therefore on what may constitute a ‘reasonably available site’).

3.3.2 Nonetheless, it is considered that this Sequential Test and its conclusions represent a sound and transparent approach to the assessment of potentially ‘reasonably available sites’ within the identified area of search.

3.3.3 It has not been possible to wholly steer the development towards an area of lower flood risk given that there are no reasonably available alternate sites which can be developed to facilitate a 2029 grid connection date at Grendon Substation.

4 The Exception Test

4.1.1 This section applies the relevant test under NPS EN-1 and the NPPF, as outlined above.

4.2 Wider Sustainability Benefits

4.2.1 In terms of the first limb of the test under paragraph 5.8.11 of NPS EN-1 and paragraph 178 (a) of the NPPF, the Scheme would provide wider sustainability benefits to the community that outweigh the flood risk. These benefits have been identified and consolidated within Section 4 of the Planning Statement **[EX6/GH7.15_C]** and the Statement of Need **[APP-556]** submitted with the DCO application. A number of technical assessments supporting the DCO submission and the Environmental Statement as a whole **[APP-038 to APP-064]** also demonstrate the following benefits which can be summarised as follows:

- The primary function of the Green Hill Solar Farm is to generate and export energy from renewable solar sources to the National Grid via Grendon Substation. The Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to decarbonise. Over a 60-year operational lifetime, the Scheme would produce between 34.35 TWh and 37.12TWh of electricity with an average lifecycle carbon intensity of the Scheme being up to 47.44 gCO2e/kWh, which demonstrates low carbon attributes compared to other non-renewable forms of electricity generation;
- The Scheme will bring in tangible economic benefits. The construction phase will result in a Gross Value Added (GVA) of £34.8 million whilst the overall change to net economic GVA per annum in the Local Impact Area during operation is £2.22 million;
- Temporary employment generated by the Scheme's construction of approximately 464 FTE jobs per annum and a gross of 15 FTE employees per annum during operational phase of the Scheme;
- The application has included an Outline Skills, Supply Chain and Employment Plan **[REP1-147]** which will be prepared prior to construction. This plan will set out measures that the Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally resulting in upskilling of the labour force;
- The Scheme will deliver significant environmental enhancement in the form of biodiversity net gains in in habitat units, hedgerow units and in river units, as set out in the Biodiversity Net Gain Assessment **[REP1-043]**; and
- A number of permissive paths for pedestrians and horse riders will be created or improved within or adjacent to six of the Sites during the operational phase of the Scheme.

4.2.2 In terms of flood risk, the Scheme has been subject to a detailed and sensitive iterative design and mitigation process which has resulted in the following embedded mitigation measures. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. Some of these measures include but are not limited to:

- Locating key infrastructure, such as substations and battery energy storage units, outside flood risk areas where possible. Where this is not achievable, units will be raised above ground level to reduce flood risk;
- Elevating all solar panels on frames, allowing water to flow freely beneath them during flood events and avoiding displacement of floodplain storage;
- 8m buffers have been established around all watercourses, including Main Rivers and Ordinary Watercourses;
- Ensuring surface water runoff is managed on site to match natural (greenfield) conditions.

4.2.3 The effect of the above measures is that there is a negligible flood risk as a result of the Scheme. Consequently, the wider sustainability benefits to the community, including those summarised above, outweigh the flood risk. This aspect of the exception test is therefore satisfied.

4.3 Project Lifetime Safety

4.3.1 The second element of paragraph 5.8.11 of NPS EN-1 and of paragraph 178 of the NPPF is considered to be satisfied through the Flood Risk Assessment which forms part of the submission. The Flood Risk Assessment and Drainage Strategy **[REP1-053]** considers flood risk (from all sources) and sets out mitigation measures to ensure that the Scheme will be safe over its lifetime. It is concluded that the Scheme demonstrates that it will not increase flood risk elsewhere and the ground beneath the panels will remain entirely permeable, draining as existing. The design of the Scheme will ensure that surface water runoff is managed on site to match natural (greenfield) conditions.

4.4 Exception Text Conclusion

4.4.1 As set out in this Section, the Scheme provides wider sustainability benefits that outweigh residual flood risk and the Scheme will be safe from flooding for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere. The Scheme is considered to pass the requirements of the Exception Test.

5 Conclusions

5.1.1 Both the Sequential and Exception Tests are considered to be satisfied through the findings of this report. It is therefore concluded that Scheme is permissible within Flood Zones 2 and 3 as all relevant policy requirements have been met.

References

Ref.1 Department of Energy Security & Net Zero (DESNZ) (2023). Overarching National Policy Statement for Energy (EN-1). London: The Stationery Office. Available at www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure

Ref.2 DESNZ (2023). National Policy Statement for Renewable Energy Infrastructure (EN-3). London: The Stationery Office. Available at www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure

Ref.3 Ministry of Housing, Communities and Local Government (MHCLG) (2024). National Planning Policy Framework. London: The Stationery Office. Available at https://www.gov.uk/government/publications/national-planning-policy-framework--2

Ref.4 West Northamptonshire Joint Planning Unit (2014). West Northamptonshire Joint Core Strategy Local Plan (Part 1). Northampton: West Northamptonshire Joint Committee. Available at www.westnorthants.gov.uk/planning-policy

Ref.5 Daventry District Council (2020). Settlements and Countryside Local Plan (Part 2) For Daventry District Daventry. Daventry District Council. Available at www.westnorthants.gov.uk/planning-policy

Ref.6 Milton Keynes Council (2019). Plan:MK 2016-2031. Milton Keynes. Milton Keynes City Council. Available at www.milton-keynes.gov.uk/planning-and-building/developingmk/planmk