

# **Green Hill Solar Farm**

## **EN010170**

# **Applicant's Responses to ExA Third Written Questions**

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## Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 6

### Applicant's Responses to ExA Third Written Questions

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## 1 Introduction

- 1.1.1 This report responds to the Examining Authority's (ExA) third written questions, issued on 18 February 2026 [PD-017]. It responds to each of the questions posed to the Applicant.
- 1.1.2 Section 2 of this report is tabulated to include the ExA's questions and a response to each question as follows:
- General and cross-topic questions;
  - Biodiversity, ecology and natural environment;
  - Compulsory acquisition, temporary possession and other land or rights considerations;
  - The draft Development Consent Order (DCO);
  - Historic environment;
  - Land use, agriculture and soils;
  - Landscape and visual, including Glint and Glare;
  - Minerals;
  - Socio-economics effects;
  - Transportation and traffic; and
  - Water environment.



## 2 Topic Questions

### 2.1 General and Cross-topic Questions

ExQ	Respondent	Question	Applicant's Response
Q3.1.1	The Applicant	<p><b>Grid Connection offer</b></p> <p>With respect to the review of connections that the National Energy System Operator (NESO) has been undertaking with the Government, Ofgem and the generation and transmission industry, as part of NESO's decision making process was the Applicant notified in December 2025 as to whether it continues to have an extant grid connection offer?</p> <p>If you have been notified and an offer has been made, is that offer now a Gate 1 or Gate 2 offer for solar generation and battery energy storage and what, if any, implications does having received a Gate 1 or Gate 2 offer have for the implementation assumptions referred to in the application documentation, for example the commencement of construction in the event of the proposed development receiving consent?</p>	<p><b>NESO Communications</b></p> <p>Both the solar and BESS components of the Scheme continue to have an extant grid connection offer.</p> <p>The Applicant received the following information from NESO in December 2025:</p> <ul style="list-style-type: none"> <li>• The solar component of the Proposed Development will receive an Agreement to Vary (ATV) to its existing connection agreement to move it to a Gate 2 Phase 1 connection offer. The firm connection date for such offers is expected to be in 2030 or earlier and, subject to NESO's current timelines, will be confirmed to the Applicant by NESO before the end of September 2026.</li> <li>• The BESS component of the Proposed Development will receive an ATV to its existing connection agreement to move it to a Gate 1 connection offer. The indicative connection date for such offers has not yet been confirmed but, subject to NESO's current timelines, is expected to be communicated by NESO in 2027, after Gate 2 offers have been sent out.</li> </ul> <p><b>Implications for the Scheme</b></p> <p>Government is clear that the Clean Power plan and Connections Reform is not about stopping projects, but is about prioritising projects for 2030, while maintaining a robust pipeline beyond 2030. Projects which continue to demonstrate they are 'ready' are expected to be re-prioritised, especially as Government continues to refine its criteria for 'strategic alignment'. It is also anticipated that some projects currently in the queue may drop out.</p> <p>While being informed of a Gate 1 prioritisation means there is not yet a confirmed grid connection date, the Applicant intends to keep developing the Scheme with the aim, if consent is granted, of securing a Gate 2 connection for the BESS in a future connections queue prioritisation round.</p> <p>NESO's communications therefore do not have any implications for the Scheme. The reasonable construction and operational scenarios considered by the Applicant remain within the bounds of the implementation assumptions referred to in the application documentation.</p>



## 2.2 Biodiversity, ecology and natural environment

ExQ	Respondent	Question	Applicant's Response
Q3.2.1	The Applicant	<p><b>Ancient woodland</b></p> <p>The main basis on which the assessment of no significant adverse effects on ancient woodland during construction has been reached in Chapter 19: Arboriculture [APP-056] is as follows:</p> <ul style="list-style-type: none"> <li>• Ancient woodland buffers are often larger than root protection areas.</li> <li>• 15 metres is the minimum ancient woodland buffer size.</li> <li>• Construction traffic would not use access tracks with the ancient woodland buffers.</li> <li>• All excavation within ancient woodland buffers would be avoided.</li> </ul> <p>The Chapter sets out that a 15-metre buffer (since increased to 30 metres, where buffers would be present) has been applied to all ancient woodlands. This is supported by the accompanying Tree Constraints Plans [APP-470 - APP-500], which depict buffers to all areas of ancient woodland.</p> <p>The Arboricultural Impact Assessment (AIA) and Outline Arboricultural Method Statement (OAMS) [APP-171] were also produced on the basis that buffer zones would be applied to all ancient woodland, as they are to be read in conjunction with the Tree Constraints Plans [APP-470 – APP-500] and Tree Impact Plans [APP-501 - APP-530], all of which depict complete ancient woodland buffers. The AIA identifies negligible impacts to ancient woodland during construction. Chapter 19 (Arboriculture) [APP-056] states that “a 15m buffer has been applied to all ancient woodlands” and that no construction phase impacts to ancient woodland are anticipated at the Sites during construction given the embedded mitigation for these features.</p> <p>Chapter 19: Arboriculture, the AIA and the OAMS do not refer to Appendix 9.12: Schedule of Protective Ecological Buffers (SPEB) [APP-095] of Chapter 9 (Rev A) of the Environmental Statement [REP1-033].</p> <p>The Outline Ecological Protection and Mitigation Strategy (Revision B) (OEPMS) [REP4-010] states that the locations and widths of all buffer zones are illustrated in the SPEB. The SPEB would be secured through implementation of the OEPMS and the Outline Landscape and Ecological Management Plan Revision B [REP3-062], secured by Requirements 8 and 7 of the draft DCO.</p> <p>However, the SPEB does not show ancient woodland buffers at the below locations of proposed development adjacent to ancient woodland:</p> <ul style="list-style-type: none"> <li>• The western edge of Sywell Wood (Cable Route Corridor and construction compound near Site C);</li> <li>• The eastern edge of Horn Wood (operational access to Site F); and</li> <li>• Barslay Spinney (Cable Route Corridor to the west of Site G).</li> </ul> <p>This was questioned at ExQ2 (Q2.7.2) [PD-011] and the response [REP3-074] confirmed that ancient woodland buffers would not be applied at these areas. It was stated that Method Statement 6 of the OEPMS (Rev B) [REP4-010] sets out protective measures specific to the Cable Route Corridor. However, this method statement does not set out methods for the protection of the ancient woodland at these points.</p> <p>In summary, Chapter 19:Arboriculture, the AIA and OAMS and the recent signposting document [REP4-024] were all produced on the basis that buffers would be applied to all</p>	<p><b>Schedule of Protective Ecological Buffers (SPEB)</b></p> <p>The figures in the SPEB were produced at an early stage of design, to highlight the standard buffers to be applied around different ecological features across the Green Hill Sites. However, they are indicative only, and do not account for works such as hedgerow or watercourse crossings, as well as landscape planting and other non-intrusive works, which will necessarily entail incursion into the buffer zones at discrete locations.</p> <p>Additionally, the SPEB does not provide indicative buffers for the Cable Route Corridor; only for the Green Hill Sites, which is the source of the confusion. The presence of valuable ecological features was factored into the final siting of the Cable Route Corridor, however given that impacts from the cable route installation will be temporary and affected habitats will be reinstated as per Method Statement 6 of the <b>Outline Ecological Protection and Mitigation Strategy (OEPMS) [EX6/GH7.5_D]</b>, figures highlighting protective buffers on the Cable Route Corridor have not been prepared.</p> <p>The matters raised are clarified in a revised version of the <b>ES Chapter 9: Ecology and Biodiversity [EX6.GH6.2.9_B]</b> and submitted at Deadline 6.</p> <p><b>Ancient Woodland Buffers</b></p> <p>It is confirmed that a minimum 15m protective buffer will be applied and implemented for all ancient woodland parcels within the Cable Route Corridor, as per the <b>Arboricultural Impact Assessment and Outline Arboricultural Method Statement (AIA and AMS) [EX6/GH6.3.19.2_A]</b>, the <b>Outline Ecological Protection and Mitigation Strategy (OEPMS) [EX6/ GH7.5_D]</b>, and <b>Outline Construction Environmental Management Plan (OCEMP) [EX6/GH7.1_C]</b>. The revised documents provided at Deadline 6 clarify where 15m buffers will be applied for the Cable Route Corridor (which includes buffers to all cabling works and construction compounds), and extended 30m buffers for the Green Hill Sites (notwithstanding the specific permitted works within the buffer zones).</p> <p><b>Internal Access</b></p> <p>The predicted level of operational maintenance use of the access track by Horn Wood and Three Shires Wood (within 15m of the ancient woodland) is not considered to increase impacts on the ancient woodland above baseline levels. The track is already in active use, and access for routine maintenance during operation will be minimal; less than one trip per day as outlined in the <b>Outline Operational Traffic Management Plan [REP1-157]</b>. Workers undertaking maintenance activities would generally be expected to travel by car, appropriate 4x4 type vehicle or light van. Enhancement of this track will also be completed using a ‘no-dig’ solution to further avoid adverse impacts on the woodland, as per the <b>AIA and OAMS [EX6/GH6.3.19.2_A]</b>.</p> <p>Moreover, a temporary access track will be created for use during construction, replacement and decommissioning, outside of the 30m ancient woodland buffer adjacent to Horn Wood. This change was proposed in Change Application 1 and is set out in Change 9 of the <b>Change Application and Consultation Report [CR1-039]</b>. The provision of this track outside of the woodland buffer zone will further reduce the risk of any adverse impacts to the ancient woodland during construction, replacement and decommissioning works.</p> <p>On the basis of the clarifications above, the assessment of effects on ancient woodland remains valid.</p>



ExQ	Respondent	Question	Applicant's Response
		<p>ancient woodland. However, ancient woodland buffers are missing from the SPEB in the three areas highlighted in Q2.7.2 of ExQ2 [PD-011]. Their absence from the proposed development is confirmed in the Applicant's response to the question in Applicant Responses to ExA Second Written Questions [REP3-074]. These matters result in the following questions:</p> <ol style="list-style-type: none"> <li>1. As set out above, the assessment of effects on ancient woodland appears to have been made on a different basis from the current proposed development. Thus, is that assessment correct?</li> <li>2. If ancient woodland buffers would be absent from the three areas highlighted in Q2.7.2 of [PD-011], how would direct and indirect effects of development on ancient woodland as an irreplaceable habitat be mitigated fully during the construction phase at Sywell Wood and Barslay Spinney?</li> </ol> <p>An increase of "fewer than one vehicle trip per day per Site for maintenance purposes" is envisaged by the Outline Operational Traffic Management Plan (Revision A) [REP1-157]. How much would such access intensify the vehicular use of the track around Horn Wood during the general operational phase, and how would any direct and indirect effects of this on the ancient woodland be mitigated fully?</p>	
Q3.2.2	The Applicant	<p><b>Signposting Document clarification</b></p> <p>The Signposting Document for Matters Raised at Issue Specific Hearings [REP4-024] refers to 15 metre and/or 30 metre buffers in respect of Work Nos. 5B/5B(vi)/8B at Sywell Wood, Horn Wood and Barslay Spinney ancient woodland. Please clarify where these buffers are secured, as they are not shown in the Schedule of Protective Ecological Buffers [APP-095] secured (through Requirement 8 of the draft development consent order) at paragraph 3.3.2 of the Outline Ecological Protection and Mitigation Strategy (Revision B) [REP4-010], as confirmed in the response to Q2.7.2 in the Applicant's Responses to ExA Second Written Questions [REP3-074].</p>	<p>The Outline Ecological Protection and Mitigation Strategy (<b>OEPMS (Revision D) [EX6/GH7.5_D]</b>) has been updated at Deadline 6 to clarify the commitment to 15m and 30m buffer zones for ancient woodland across the Scheme. As per the Applicant's response to Q3.2.1, the <b>Appendix 9.12 Schedule of Protective Ecological Buffers CONFIDENTIAL [APP-095]</b> is indicative only.</p>
Q3.2.3	The Applicant	<p><b>Ancient woodland buffers</b></p> <p>The NPS EN-1 and the National Planning Policy Framework categorise both veteran trees and ancient woodland as irreplaceable habitats. The Outline Arboricultural Method Statement [APP-171] sets out that the Cable Route Corridor has been widened up to 120m adjacent to identified veteran trees to provide sufficient space to allow for open cut trenching around Veteran Tree Buffer Zones, ensuring impacts to veteran trees are avoided (secured in the Works Plan [REP3-008]). Please explain why the same protection is not proposed for ancient woodland adjacent to the Cable Route Corridor, including whether constraints such as the presence of the Sywell Aerodrome runway adjacent to the Sywell Wood ancient woodland are a contributing factor to this absence.</p>	<p>Please refer to the Applicant's response to Q3.2.1. It is fully intended that minimum 15m buffer zones are applied to all ancient woodland habitats, including on the Cable Route Corridor.</p> <p>The Cable Route Corridor west of Sywell Wood is constrained by the location of Sywell Aerodrome. The Applicant sought to minimise impacts on the operation of the Aerodrome and engaged with the Aerodrome on the location of the Cable Route Corridor whilst acknowledging the constraint of the Ancient Woodland. The Cable Route Corridor east of Barslay Spinney is aligned to the field boundary north of Barslay Spinney to minimise the effects of the cable easement on the remaining land and to ensure that the landowner is not responsible for an isolated or inaccessible (landlocked) area of land during construction.</p> <p>As outlined in Section 3.4 of the Outline Ecological Protection and Mitigation Strategy (Revision D) <b>[EX6/GH7.5_D]</b> a minimum 15m protective buffer will be applied and implemented for all works in the Cable Route Corridor, as per the Arboricultural Impact Assessment and Outline Arboricultural Method Statement <b>[EX6/GH6.3.19.2_A]</b>. Physical works to lay cabling (such as trenching, drilling works, and laying of haul routes) in the Cable Route Corridor will not be undertaken within the 15m buffer in line with the Government's standing advice, and as set out in out in the <b>OEPMS (Revision D) [EX6/GH7.5_D]</b> and <b>OCEMP (Revision C) [EX6/GH7.1_C]</b>. In addition, no site personnel or plant (machinery) shall enter the buffer, and no equipment will be stored therein.</p>
Q3.2.4	The Applicant	<p><b>Ancient woodland buffers</b></p> <p>A temporary haul road would be constructed alongside the Cable Route Corridor (CRC). The Milton Keynes City Council Statement of Common Ground draft (Revision A) [REP4-031] notes that there would be 11 HGV arrivals per day at the CRC access on the A509 near Site</p>	<p>Please refer to the Applicant's response to Q3.2.1. It is fully intended that minimum 15m buffer zones are applied to all ancient woodland habitats, including on the Cable Route Corridor. Additional mitigation measures for the protection of woodland habitats are detailed in the <b>OEPMS (Revision D) [EX6/GH7.5_D]</b> and <b>OCEMP (Revision C) [EX6/GH7.1_C]</b>. As such, no significant</p>



ExQ	Respondent	Question	Applicant's Response
		G during the haul road construction period. As ancient woodland buffers to Sywell Wood and Barslay Spinney would not be present within the CRC, how would the ancient woodland be protected from issues such as damage or compaction to soil, an increase in air and soil pollution, and increased disturbance to wildlife such as noise from additional people and traffic?	impacts are anticipated through the movement of construction traffic on Sywell Wood or Barslay Spinney.
Q3.2.5	The Applicant	<p><b>Duration of works adjacent to ancient woodland</b></p> <p>What would be the likely duration of works within the Cable Route Corridor and the use of Construction Compound 1 adjacent to the Sywell Wood, Horn Wood or Barslay Spinney areas of ancient woodland?</p>	<p>As outlined in <b>ES Chapter 2: EIA Process and Methodology [APP-039]</b> the environmental assessments have considered a 24-month construction programme for the Scheme including the Cable Route Corridor as a worst case. <b>ES Chapter 4: Scheme Description [EX6/GH6.2.4_B]</b> provides an overview of the potential construction programme. However, the following indicative construction periods have been estimated for illustration purposes:</p> <ul style="list-style-type: none"> <li>• Construction Compound 1 adjacent to Sywell Wood: 17 months.</li> <li>• Cable Route Corridor adjacent to Sywell Wood: 2 months.</li> <li>• Green Hill F construction adjacent to Horn Wood: 23 months.</li> <li>• Cable Route Corridor adjacent to Barslay Spinney: 1 month.</li> </ul> <p>Construction durations will be finalised following detailed design.</p>
Q3.2.6	The Applicant	<p><b>Outline Ecological Protection and Mitigation Strategy</b></p> <p>Should paragraph 5.2.2 of the Outline Ecological Protection and Mitigation Strategy (Rev B) [REP4-010] be updated to read “..<b>between</b> the months of March and October inclusive”?</p>	Yes, this is the correct reading of paragraph 5.2.2. Artificial working-area lighting in exceptional operations should be minimised as far as possible between March - October inclusive (the most active period for bats and other wildlife groups). This wording has been updated and a revised version of the <b>OEPMS (Revision D) [EX6/GH7.5_D]</b> was submitted at Deadline 5.
Q3.2.7	The Applicant	<p><b>Ancient woodland buffers</b></p> <p>The Signposting Document for Matters Raised at Issue Specific Hearings [REP4-024] sets out that, where ancient woodland buffers are present, proposed works within 15 metres of the ancient woodland would be permitted only in exceptional circumstances, and would be restricted to the upgrading of access tracks through the use of a “no-dig” solution and provision of permissive paths that use existing tracks or connect to existing public rights of way within the buffer zone. Please explain where these restrictions are clearly secured.</p>	<p>The <b>OEPMS (Revision D) [EX6/GH7.5_D]</b> has been updated at Deadline 6 to clearly set out these restrictions. This document will be the securing mechanism for the above mitigation measures in relation to ancient woodlands.</p> <p>The <b>OCEMP (Revision C) [EX6/GH7.1_C]</b> includes ‘Any access tracks (for use during operation/decommissioning) situated within Veteran Tree/Ancient Woodland Buffer Zones will be constructed using a ‘no-dig’ solution and all excavation within Veteran Tree/Ancient Woodland Buffer Zones will be avoided’ under Table 3.13.</p>
Q3.2.8	The Applicant	<p><b>Ancient woodland buffers</b></p> <p>Please explain the procedure which would be followed if the Ecological Clerk of Works did not authorise proposed unavoidable works within ancient woodland buffers.</p>	<p>If the EcoCoW does not authorise works within the ancient woodland buffer zone, those works cannot proceed under the current terms of the <b>OEPMS (Revision D) [EX6/GH7.5_D]</b>; refer to paragraph 3.3.9.</p> <p>In the event that the EcoCoW/ACoW withholds authorisation for “unavoidable” works, the following tiered procedure will be implemented:</p> <ul style="list-style-type: none"> <li>• <b>Stage 1: Engineering Re-evaluation:</b> The Principal Contractor’s engineering team must formally demonstrate that all alternative options (e.g., different machinery, directional drilling, or adjusted site layouts) have been exhausted.</li> <li>• <b>Stage 2: Mitigation/ Compensation:</b> If the constraint is deemed truly immovable, the contractor must propose additional, site-specific mitigation measures that go beyond the standard OEPMS requirements to reduce the impact to a level acceptable to the EcoCoW.</li> <li>• <b>Stage 3: Decision Escalation:</b> If a works are not authorised by the EcoCoW following Stages 1 and 2, the matter is escalated to the <b>Project Environmental Manager</b> and the <b>Lead Design Engineer</b>. They will make a decision taking into account the DCO (Development Consent Order) requirements and National Policy Statements.</li> </ul>
Q3.2.9	The Applicant	<p><b>Ancient woodland: assessment against NPS EN-1 (2024)</b></p>	The proposed development will not result in the loss or degradation of ancient woodland. As per the Applicant’s response to Q3.2.1, protective buffers will be applied (including on the Cable Route



ExQ	Respondent	Question	Applicant's Response
		If the proposed development were considered to result in the loss or deterioration of ancient woodland, please explain whether there would be wholly exceptional reasons and a suitable compensation strategy would exist.	Corridor) and secured through a revised version of the <b>OEPMS (Revision D) [EX6/GH7.5_D]</b> is submitted at Deadline 6.
Q3.2.10	Natural England The Forestry Commission	<p><b>Ancient woodland</b></p> <p>It was confirmed at Q2.7.2 of the Applicant's Responses to ExA Second Written Questions [REP3-074] that 30-metre ancient woodland buffers may not be applied at the following areas of the proposed development where it would border ancient woodland, as impacts at these points are considered to be temporary in nature:</p> <ul style="list-style-type: none"> <li>• The western edge of Sywell Wood (Cable Route Corridor and construction compound near Site C)</li> <li>• Barslay Spinney (Cable Route Corridor to the west of Site G)</li> <li>• The eastern edge of Horn Wood (operational access to Site F).</li> </ul> <p>This is supported by plans within Appendix 9.12: Schedule of Protective Ecological Buffers (SPEB) [APP-095] of Chapter 9 (Revision A) of the Environmental Statement [REP1-033] showing no ecological buffers at the above three locations. The SPEB would be secured through implementation of the Outline Ecological Protection and Mitigation Strategy (Revision B) [REP4-010] and the Outline Landscape and Ecological Management Plan (Revision B) [REP3-062], secured by Requirements 8 and 7 of the draft development consent order.</p> <p>The Signposting Document for Matters Raised at Issue Specific Hearings [REP4-024] provides further information on ancient woodland matters at Pages 4-27. However, please note that it appears to have been produced on the basis that buffers would apply to all ancient woodland bordering the proposed development, when (as set out above) these would currently be absent in some areas.</p> <p>Please confirm whether you consider that the development would result in the loss or deterioration of ancient woodland as a result of the absence of buffers at the three locations listed above.</p>	<p>The Applicant notes that this question is not directed at the Applicant but would refer the Forestry Commission and Natural England to the Applicant's response to Q3.2.1, where it is confirmed that protective buffers will be applied.</p> <p>The Applicant notes that the approach to proposed mitigation measures is agreed with Natural England under item ECO-12 of the <b>Statement of Common Ground [REP5-106]</b>.</p>
Q3.2.11	Natural England The Forestry Commission	<p><b>Ancient Woodland</b></p> <p>Please explain whether you are satisfied that the proposed development includes measures to mitigate fully any direct and indirect effects of development on ancient woodland during both construction and operational phases.</p>	The Applicant notes that this question is not directed at the Applicant.
Q3.2.12	The Applicant Milton Keynes City Council	<p><b>Bat surveys</b></p> <p>Given the concerns raised at paragraph 4.15 of Milton Keynes City Council's LIR [REP1-169] regarding the adequacy of bat surveys with particular regard to barbastelle bats, should further surveys be required in order to establish any necessary measures to protect the species?</p>	As per the <b>Milton Keynes City Council Statement of Common Ground DRAFT (Revision C) [REP5-102]</b> , a meeting was held on 20/01/2026 where this matter was discussed. It was agreed that further surveys would not have materially affected the assessment or the mitigation measures proposed. This matter is agreed in the Statement of Common Ground.
Q3.2.13	The Applicant	<p><b>Effects on bats</b></p> <p>Proposed mitigation for the effects of the proposed development on bats includes ecological buffer zones. However, no ancient woodland buffers are proposed within the Cable Route</p>	Please refer to the Applicant's response to Q3.2.1, where the inclusion of ancient woodland buffer zones within the Cable Route Corridor and in relation to Construction Compounds, is confirmed.



ExQ	Respondent	Question	Applicant's Response
		Corridor and adjacent to Construction Compound 1. Can the Applicant explain how effects on bats have been adequately mitigated in the absence of ancient woodland buffers for these elements of the proposed development?	
Q3.2.14	The Applicant	<p><b>Bat mitigation</b></p> <p>Is there sufficient evidence so that any potential harm to bats is adequately mitigated?</p>	The Applicant submits that potential harm to bats is avoided and/ or mitigated sufficiently by the measures outlined in the Environmental Statement Chapter 9 Ecology and Biodiversity (Revision B) <b>[EX6/GH6.2.9_B]</b> and <b>OEPMS (Revision D) [EX6/GH7.5_D]</b> . Method Statement 2 of the OEPMS sets out the provision of Biodiversity Protection Zones, Method Statement 4 details an ecologically-sensitive lighting strategy, and Method Statement 6 details mitigation measures to be adopted prior to habitat removal.
Q3.2.15	Natural England Milton Keynes City Council	<p><b>Effects on barbastelle bat</b></p> <p>Milton Keynes City Council [REP3-085] raise significant concern that the adjacent woodland and linking boundary features at Site G are of high importance to barbastelle bats, an Annex II species typically considered very rare nationally. Static bat detector surveys (Figure 9.6.7 Bat Static Detector Locations (Green Hill G)) in Appendix 9.6 Bat Surveys (Revision A) [REP1-047] recorded high levels of barbastelle bat activity at location SD38 on the western boundary of Site G (as set out in the Applicant's response to MKC 4.15 of the Applicant's Responses to Local Impact Report Responses [REP4-018]). Location SD38 is at the end of a small belt of woodland and across the A509 road from the Barslay Spinney ancient woodland and adjoining hedgerow.</p> <p>The Bat Surveys document states that linear features such as hedgerows and small woodland blocks provide bat flight paths and foraging resources. It states that broadleaved woodland offers a high-quality foraging habitat for bats.</p> <p>A tree with a high suitability for roosting bats was recorded (Figure 9.6.14 Bat Ground Level Tree Assessment Results (Green Hill G)) in [REP1-047] in close proximity to location SD38. Trees with moderate suitability for roosting bats were identified in Barslay Spinney and within the Cable Route Corridor (CRC) to the west of the spinney (9.6.19 Bat Ground Level Tree Assessment Results (Cable Route 5 of 5) [REP1-047]). Bat activity surveys were not carried out within the CRC.</p> <p>Work No 5B for the CRC passing west from the A509 road close to location SD38, and adjacent to the Barslay Spinney ancient woodland and a hedgerow to its west, comprises works to lay electrical cables including laying down of access tracks, roads, drainage infrastructure, cable laying, tunnelling, boring and drilling works and temporary construction and decommissioning laydown areas which may include areas of hardstanding, car parking, materials and equipment storage, site and welfare offices and workshops. A temporary haul route would be implemented alongside the cable route (Outline Ecological Protection and Mitigation Strategy (Revision B)) [REP4-010], Section 3.4, which would require the use of HGVs to construct.</p> <p>The CRC would contain no ecological buffers, as set out in the Schedule of Protective Ecological Buffers [APP-095]. As features such as the ancient woodland and adjoining line of hedgerow and trees across the road from location SD38 may provide flight paths and foraging resources for the barbastelle bat, do you consider that the absence of ecological buffers to these features adjacent to the CRC may result in harm to the protected species and relevant habitat?</p>	The Applicant notes that this question is not directed at the Applicant, however, please refer to the Applicant's response to Q3.2.1, where the inclusion of ancient woodland buffer zones within the Cable Route Corridor is confirmed.
Q3.2.16	Natural England	<p><b>Effects on barbastelle bat</b></p> <p>Do you consider that the information supplied is sufficient to determine the effects of the proposed development on populations of barbastelle bat for the purposes of Environmental Impact Assessment?</p>	The Applicant notes that this question is not directed at the Applicant. However, the Applicant would refer the ExA to the <b>Natural England Statement of Common Ground (Revision B) [REP5-106]</b> , within which Natural England confirm their acceptance of the Applicant's survey scope, mitigation measures and assessment of effects in ECO-3, 10, 11, 12, 13 and 14.



ExQ	Respondent	Question	Applicant's Response
Q3.2.17	The Applicant	<p><b>Cable Route Corridor crossing techniques</b></p> <p>As set out above, concern is raised that linking boundary features at Site G may be of high importance to barbastelle bats, a European Protected Species (EPS), and high levels of barbastelle activity were identified in close proximity to the Cable Route Corridor (CRC) where it passes west from the A509 road. Linear elements such as hedgerow and ditches provide flight paths and foraging resources for bats. Hedgerow HV_SP8955_001 and ditch HV_SP8955_003 within the CRC are proposed in the Crossing Schedule (Revision A) [REP3-068] to be crossed by the open cut method. Given their potential importance to the EPS, would trenchless techniques such as HDD be appropriate at these crossings instead?</p>	<p>Barbastelle bats are typically associated with woodland. However, they are strong flyers and readily commute across open landscapes, such as pastoral landscapes, to feed. The maximum width of any hedgerow or watercourse gap resulting from open-cut trenching within the Cable Route Corridor is 10m (as secured through the <b>Outline Landscape and Ecological Management Plan [EX6/GH7.4_E]</b>) and this is not considered to have any likely significant effects on commuting bats. Barbastelle bats are considered able to cross such gaps, and indeed likely already cross larger gaps which exist within the Green Hill G site, where the hedgerow and watercourse network is fragmented. The impacts will also be temporary in nature, with hedgerow habitats reinstated once the cable has been installed. On this basis, HDD as an alternative to open-cut trenching is not considered necessary at the crossing points for Hedgerow HV_SP8955_001 and ditch HV_SP8955_003 within the <b>Crossing Schedule (Revision B) [EX6/GH7.18_B]</b>.</p>
Q3.2.18	The Applicant	<p><b>Extent of ecological pre-construction site walkover</b></p> <p>The Outline Construction Environmental Management Plan (Revision A) [REP1-131] sets out at Table 3.3 that a pre-construction site walkover would be undertaken in advance of mobilisation/any potential advance works to reconfirm the ecological baseline conditions and to identify any new ecological risks, such as newly constructed badger setts. Would this include all areas of the proposed development, including the Cable Route Corridor?</p>	<p>Yes - this pre-commencement survey is detailed in Section 9.2: Pre-commencement Survey of the <b>OEPMS (Revision D) [EX6/GH7.5_D]</b>. This section details that 'an update survey for badger setts of land within the Order Limits prior to construction commencing will be necessary', and that 'The survey will be carried out no more than 1 month prior to the commencement of construction activities within a particular Site or section of Cable Route Corridor'.</p>
Q3.2.19	The Applicant	<p><b>BESS safety</b></p> <p>Please outline any evidence on the reliability of the self-actuating valves which would control the BESS firewater containment system.</p>	<p>The BESS drainage strategy, as assessed in <b>ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C]</b> and detailed in <b>Annex J: Green Hill BESS [REP5-031]</b>, incorporates automatically actuated isolation mechanisms at outfalls from the battery storage areas to contain firewater and prevent discharge to the wider drainage network. Isolation will be capable of automatic activation (from the BESS fire alarm system) during an incident, with manual override provided as a secondary control.</p> <p>Automatic pollution control valves and drain isolation devices are established components of UK industrial drainage systems and are used for firewater containment and pollution prevention in accordance with recognised guidance, including CIRIA C736 (Containment systems for the prevention of pollution). These systems are routinely deployed in energy, industrial and infrastructure settings, as evidenced by published industry case studies demonstrating operational installations of automatic pollution containment devices.</p> <p>Such devices are typically designed on fail-safe principles, with the default position under loss of power or fault conditions being closed. They are subject to manufacturer certification, commissioning and routine inspection and maintenance. They may be linked to fire detection or alarm systems to enable automatic closure without reliance on manual intervention.</p> <p>The detailed specification, testing and maintenance regime for the BESS isolation system will be secured through the drainage design approval process under Requirement 11 (Surface and foul water drainage) in Schedule 2 to the <b>Draft Development Consent Order [EX6/GH3.1_E]</b>, consistent with the containment principles assessed in the ES and FRA suite.</p> <p>On that basis, the proposed isolation mechanisms represent established and routinely implemented pollution containment technology.</p>
Q3.2.20	The Applicant	<p><b>Hedgerow obstacles within sites</b></p> <p>Appendix B (Main Site Obstacles Table) of the Crossing Schedule Revision A [REP3-068] does not contain an entry for Obstacle Description FB61 (hedgerow within Site F). Please update the document as necessary.</p>	<p>Obstacle FB61 is captured in the <b>Crossing Schedule [EX6/GH7.18_B]</b> under Appendix A as part of crossing GHF_SP8958_003 (Crossing ID) as it is located on the Cable Route Corridor. The Obstacle ID is GR_HR_HR_XX_238.</p>



### 2.3 Compulsory acquisition, temporary possession and other land or rights considerations

ExQ	Respondent	Question	Applicant's Response
Q3.3.1	The Applicant	<p><b>BoR – Added interests</b></p> <p>The most recent version of the Schedule of Changes to the BoR (Revision B) [REP3-127] includes 'added interests' in relation to land included within the Order Limits. Can the Applicant please confirm that measures have been taken to ensure that new added interests are fully aware of the proposed development?</p>	<p>The Applicant has identified new 'Added Interests' within the Scheme. Where the person with the new or added interest was not previously identified within the Book of Reference, a letter pursuant to section 102A of the Planning Act 2008 was sent to them to notify them of their status as an Affected Person and their right to register to make submissions into the Examination. New interests have been identified through ongoing due diligence, including refreshing Land Registry Data to identify where new interests have been added to registered Titles within the DCO Order Limits. Ongoing due diligence also identified a number of new interests with potential subsoil rights in unregistered highways; letters were also sent to these interests.</p>
Q3.3.2	The Applicant	<p><b>BoR – Unknown</b></p> <p>There remain a number of Category 1, 2 and 3 persons identified as 'unknown' in the BoR Revision D [REP3-032]. Please can the Applicant confirm whether further steps have been/will be taken to identify any of these further before the close of the Examination?</p>	<p>A number of plots of land within the Order Limits are unregistered and it has not been possible to confirm conclusively who the landowner is. Site notices have been displayed enabling any unknown owner to notify the Applicant of their land interest. It should be noted that, for each of these plots where an unknown owner is listed, a reputed owner or owners have also been identified. This reflects that the Applicant has identified the likely owner(s) of the land, but there has been insufficient evidence to demonstrate this conclusively. It is not considered appropriate to remove the "unknown" entries from these plots in the Book of Reference in the absence of proof of title being presented. There are no plots where the owner is wholly unknown.</p> <p>In relation to Category 2 interests, ongoing due diligence has not identified the beneficiary of the unknown interests. Site notices advising of the Scheme were erected but did not result in these interests being identified.</p> <p>Finally, in relation to Category 3 interests, a number of properties are listed on the basis that their owners may be entitled to make a 'relevant claim'. For these properties, the potential entitlement to make a relevant claim arises from the location of the property, irrespective of the identity of the current owner. Notices were sent to these properties to notify them of the Scheme.</p>
Q3.3.3	The Applicant and Anglian Water	<p><b>Unidentified AW assets</b></p> <p>In the Relevant Representations submission dated 6 January 2026 [CR-005], it has been highlighted that not all AWS easements and freehold assets which are affected by the scheme in full have been identified.</p> <p>Could both the Applicant and Anglian Water provide an update on this matter and whether all outstanding easements and assets will be identified prior to the close of this Examination.</p>	<p>AWS confirmed to the Applicant on 5 March that they have reviewed the <b>Book of Reference Revision E [REP5-010]</b> and consider all matters resolved relating to their assets. This will be reflected in the next version of the Statement of Common Ground submitted into examination <b>[EX6/GH8.3.9_B]</b>.</p>
Q3.3.4	The Applicant and National Highways	<p><b>Additional Plot 12-128-b</b></p> <p>In the Relevant Representation [CR-006] in respect of the CA of additional land, National Highways (NH) have raised objections to the compulsory purchase powers over this plot. Are discussions ongoing on this point and please could the Applicant address NH's objections and indicate if they are likely to be resolved prior to the close of this Examination?</p>	<p>National Highways has confirmed that it holds an interest in plots 12-127, 12-128-a and 12-128-b pursuant to section 263 of the Highways Act 1980. This is an interest as strategic highway authority, and not a proprietary interest. This means that National Highways is not able to grant an easement in this land. West Northamptonshire Council own the freehold of these plots and would be the party negotiating an easement to place the cabling in the subsoil below the highway in this area. National Highways has confirmed that it would be providing consent to the cable works under the protective provisions due to the geotechnical risks to the highway, but would not be granting any property rights for the cable.</p> <p>The form of protective provisions and a side agreement have been agreed with National Highways and the agreed protective provisions are included in the draft DCO (Revision E) <b>[EX6/GH3.1_E]</b>. The Applicant understands all matters are now resolved with National Highways.</p>
Q3.3.5	The Applicant	<p><b>Crown Land</b></p> <p>In Section 10.1 of the Statement of Reasons Revision B [REP3-028] it is noted that it has not been possible to determine if the British Railways Board Limited land has been transferred away from the Crown authority but that engagement is ongoing. Please could</p>	<p>Crown Land was identified within the Book of Reference on a highly precautionary basis, with the Applicant then seeking to confirm with the relevant Crown entity that it does hold that interest. Two Crown interests were identified: a presumed subsoil interest in the public highway in plot 15-202, held by the Duchy of Lancaster; and rights within a conveyance dated 6 March 1972 that</p>



ExQ	Respondent	Question	Applicant's Response
		<p>the Applicant provide an update on whether anything further has been clarified and, if required, the relevant consents are being sought from the Crown Estate?</p>	<p>may benefit the British Railways Board, affecting plots 12-143, 12-144, 12-145 and 12-146. This interest was included on the basis that the interest may be held by the Secretary of State for Transport.</p> <p>In regard to Plot 15-202-a, the Applicant has received confirmation from the Keeper of Records at the Duchy of Lancaster, via email that: "The Duchy's interests are to the mines and minerals registered under title NN366973. As you note below, these interests fall outside of the DCO area. The Duchy does not own the subsoil under the highway." Following receipt of this correspondence, the Book of Reference was updated to remove the interest previously recorded as "<i>The King's Most Excellent Majesty in the right of his Duchy of Lancaster (in respect of subsoil up to the centreline of the highway)</i>". This change was made in Revision E of the Book of Reference [REP5-010].</p> <p>In respect of the British Railways Board interests, the Applicant received an email from the Historic Railways Estate on behalf of the Department for Transport confirming that the British Railways Board has relinquished all interest in the land. Please see Appendix A to the Applicant's Written Summary of Oral Submissions at Compulsory Acquisition Hearing 2 [EX6/GH8.1.46].</p> <p>Following receipt of this confirmation, no Crown Land exists within the Order Limits. The draft DCO provided at Deadline 6 [EX6/GH3.1_E] has therefore been updated to reflect this, removing the Crown Land Plan as a certified document (as it is now redundant) and removing article 49 (Crown rights) as no longer applicable.</p>
Q3.3.6	The Applicant	<p><b>Funding Statement</b></p> <p>Further to matters raised at Open Floor Hearing 2 and noting the Applicant's submissions in [REP3-129] and the provisions of the dDCO, the Applicant is requested to consider whether it is able to provide additional information to support the Funding Statement, such as audited accounts or summaries as have been provided for other projects (see Tillbridge Solar Project, Botley West Solar Farm or Gate Burton Energy Park for examples).</p>	<p>The Applicant's response in GEN-004 <b>The Applicant's Responses to Relevant Representation [REP3-129]</b> explains that funding and delivery of the Scheme will be financed through private investment as is common for all large-scale energy projects in Great Britain. This model enables the development of essential low-carbon infrastructure without reliance on public funds. The Applicant is ultimately owned by three investment funds, which are managed by Macquarie Asset Management on behalf of a range of investors, including a number of UK pension funds. These investors would receive returns through the funds, while Macquarie would receive management fees, as is standard. Further funding may come from commercial lenders, who would receive interest payments. The funding structure is common in the energy sector and ensures that the Scheme is financially robust and deliverable.</p> <p>Therefore, providing audited accounts or summaries will not provide evidence that the Scheme can be built by these entities using existing funds as the financing and investment set out above is still required.</p> <p>The Applicant notes that Article 48 of the draft DCO requires a parent company guarantee or other form of security to be approved by the Secretary of State prior to exercise the compulsory acquisition and temporary use powers. This provision ensures that any compensation liability arising from the use of such powers will be paid.</p>
Q3.3.7	The Applicant	<p><b>Land parcel 08-094-a</b></p> <p>Further to matters raised in relation to the width of part of 08-094-a in proximity to the woodland and pylon (ZA284) and noting the Applicant's submissions in [REP3-129], please could the Applicant advise if further discussions have been carried out with the APs in relation to their concerns over this parcel of land? Has the 40m width between the woodland and pylon been confirmed and does this allow for the cable to be</p>	<p>The Applicant met with the Affected Party on the 6 February and shared an illustrative section which shows that there is approximately 41.3m separation between the woodland and the pylons. The width of the Order Limits in this section is 32.59m which allows a 15m woodland offset, a 14.31m indicative cable route corridor and a 12m offset to the High Voltage Overhead Transmission lines. In the meeting, the Applicant and their technical consultants discussed the activities that would take place within the cable route corridor and explained the process and potential order of construction activities. The Applicant set out where the commitments to the woodland buffers are secured</p>



ExQ	Respondent	Question	Applicant's Response
		accommodated with the necessary woodland buffers and stand-off distances from the pylon?	<p>through the <b>Arboricultural Impact Assessment and Outline Arboricultural Method Statement [EX6/GH6.3.19.2_A]</b> and the <b>Outline Ecological Protection and Mitigation Strategy [EX6/GH7.5_D]</b>.</p> <p>As per the Applicant's response to Q3.2.1 above, the OEPMS, OAMS and OCEMP have been revised for Deadline 6 to clarify where 15m buffers will be applied for the Cable Route Corridor and extended 30m buffers for the Green Hill Sites (notwithstanding the specific permitted works within the buffer zones).</p> <p>The Affected Party has not raised any further queries with the Applicant since the meeting; however, the Applicant has arranged to meet Mr Partridge on site on the 26 March 2026 along with their representatives.</p>



## 2.4 The draft Development Consent Order (DCO)

ExQ	Respondent	Question	Applicant's Response
Q3.4.1	The Applicant and National Grid Electricity Transmission plc (NGET)	<p><b>Protective provisions in favour of NGET</b></p> <p>NGET's submission at deadline 4 [REP4-041] states that the protective provisions in their favour in Part 3 of Schedule 15 of the draft DCO [REP3-024] do not contain the necessary future-proofing wording for the protection of the NGET Upgrade Projects (the Weston Marsh to East Leicestershire Project and the Sundon to Grendon Reconductoring Project).</p> <p>Could both parties provide an update on negotiations on this matter, including an indication as to whether you consider a satisfactory resolution will be achieved before the close of the examination.</p>	<p>The Applicant and NGET met on 13 March 2026 to discuss the potential interaction between the Scheme and NGET's future projects. Further to this call, the protective provisions and side agreement were updated to reflect the discussions. The revised documents are currently with NGET's solicitor's for consideration. The Applicant is confident that agreement will be reached before the end of Examination.</p>
Q3.4.2	Cadent Gas Limited	<p><b>Protective provisions in favour of Cadent Gas Limited</b></p> <p>Could you confirm whether you are satisfied with the protective provisions as set out in Part 8 of Schedule 15 of the draft DCO [REP3-024]. If you are not, please provide us with the alternative form of wording that you would prefer.</p>	<p>The Applicant confirms that protective provisions have been agreed with Cadent Gas Limited. The agreed form of protective provisions are included in Part 8 of Schedule 15 to the draft Development Consent Order (Rev E) [EX6/GH3.1_E]</p>
Q3.4.3	The Applicant and Anglian Water	<p><b>Protective provisions in favour of Anglian Water</b></p> <p>The draft SoCG [REP2-064] indicates that bespoke protective provisions have been agreed, and that these will be included in the revised draft DCO at deadline 3. There appear to have been no changes made to Part 5 of Schedule 15 in [REP3-024]. As the wording in the draft SoCG is somewhat ambiguous, could you confirm whether any changes need to be made to Part 5 of Schedule 15 as part of agreeing protective provisions or whether Anglian Water were satisfied with the existing wording of Part 5 of Schedule 15 in the previous iteration of the draft DCO [CR1-014]?</p>	<p>The protective provisions for Anglian Water were updated in revision A of the draft DCO. These changes are visible in the tracked version [REP1-009]. Following submission of this version of the DCO, Anglian Water confirmed the protective provisions were agreed. No changes have been made to Part 5 of Schedule 15 since the agreed form of protective provisions was included in Revision A.</p>

**2.5 Historic environment**

ExQ	Respondent	Question	Applicant's Response
Q3.5.1	North Northamptonshire Council	<p><b>Issues awaiting comment in draft Statement of Common Ground</b></p> <p>The draft SoCG submitted at deadline 4 [REP4-027] indicates that the Applicant is awaiting the Council's comments on a number of cultural heritage matters (CH-03 to CH-08 inclusive). Do you have any concerns that you wish to raise in relation to those matters, which include the heritage assessment, proposed mitigation measures, and archaeological assessment?</p>	<p>The Applicant notes that this question is not directed at the Applicant but can confirm that items CH-04 to CH-08 of the <b>North Northamptonshire SOCG [REP5-098]</b> have been agreed with North Northamptonshire Council.</p> <p>Item CH-03 relating to mitigation for built heritage assets is not agreed. The Applicant considers the mitigation proposed by the Scheme to be acceptable.</p>
Q3.5.2	West Northamptonshire Council	<p><b>Matters still under discussion in draft Statement of Common Ground</b></p> <p>The draft SoCG submitted at deadline 4 [REP4-029] indicates that a number of cultural heritage matters remain under discussion (CH-03 to CH-08 inclusive). Do you have any concerns that you wish to raise in relation to those matters, which include the heritage assessment, proposed mitigation measures, and archaeological assessment?</p>	<p>The Applicant notes that this question is not directed at the Applicant but can confirm that all matters relating to Cultural Heritage are considered agreed with West Northamptonshire as set out in the Statement of Common Ground <b>[REP5-100]</b>.</p>
Q3.5.3	Historic England	<p><b>Any outstanding issues in relation to archaeology</b></p> <p>In your relevant representation [RR-1228] and as part of your contributions to Issue Specific Hearing 1 (ISH1) you indicated that further discussions would be taking place between yourselves and the Applicant regarding matters relating to archaeology. Could you confirm whether you are now satisfied with the Applicant's approach to matters relating to archaeology or are there any outstanding concerns?</p> <p>If you do have any outstanding concerns, could you explain exactly what they are and what actions would be necessary to address those concerns?</p>	<p>The Applicant notes that this question is not directed at the Applicant but confirms that all matters relating to Cultural Heritage are considered agreed with Historic England as set out in the Statement of Common Ground <b>[EX6/GH8.3.4_A]</b>.</p>



## 2.6 Land use, agriculture and soils

ExQ	Respondent	Question	Applicant's Response
Q3.6.1	North Northamptonshire Council	<p><b>Issues awaiting comment in draft Statement of Common Ground</b></p> <p>The draft SoCG submitted at deadline 4 [REP4-027] indicates that the Applicant is awaiting the Council's comments on a number of agricultural matters (ALC-03 to ALC-05 inclusive). Do you have any concerns that you wish to raise in relation to those matters, which include impacts to ALC graded land and soil quality, proposed mitigation measures, and residual effects?</p>	<p>The Applicant notes that under the Statement of Common Ground North Northamptonshire Council (Revision B) [REP5- 098] all matters are now agreed except ALC-03.</p> <p>The Applicant notes that the consultee's position under ALC-03 '<i>The Council consider the 60 year period more permanent than temporary and therefore results in a loss of BMV land and the impact of this loss understated</i>'.</p> <p>The Applicant disagrees with this position. Decommissioning is secured through Requirement 21 of Schedule 2 to the <b>Draft DCO Revision E [EX6/GH3.1_E]</b> and requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. Upon decommissioning each Site will be restored to its current use and returned to the landowner.</p> <p>The conversion of arable land to grassland will have a beneficial effect on soil functions and agricultural land quality. Taking land out of intensive arable farming (e.g., ceasing tillage) is also a common practice used to improve soil structure. This land can therefore be regarded as long-term fallow and as part of a national strategic reserve.</p> <p>The Applicant considers the assessment of effects to be correct and acceptable.</p>



## 2.7 Landscape and visual, including glint and glare

ExQ	Respondent	Question	Applicant's Response
Q3.7.1	Applicant and SGHS	<p><b>LVIA Methodology</b></p> <p>In the SGHS response Comments on responses to ExQ2 (Q2.13.8) [REP4-044] there still appears to be some dispute over the LVIA methodology. Has any discussion or progress been made in respect of this to narrow the areas of dispute or do the parties' stances remain as per the Applicant's Response to Stop Green Hill Solar SGHS-011 in [REP4-021]?</p>	<p>The Applicant maintains its position as stated within its response to Stop Green Hill Solar SGHS-011 within <b>REP4-021</b>.</p> <p>A detailed LVIA methodology that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included within <b>ES Appendix 8.1 [EX6/GH6.3.8.1_B]</b>, which has been progressed and agreed with the Local Planning Authorities. Please refer to <b>North Northamptonshire Council Statement of Common Ground [REP5-098]</b> and <b>West Northamptonshire Council [REP5-100]</b> where the methodology is agreed.</p>
Q3.7.2	North Northamptonshire Council	<p><b>Glint and Glare Addendum</b></p> <p>At Deadline 4, the Applicant submitted an addendum to the Glint and Glare assessments to consider the impacts on local roads within NNC's jurisdiction [REP4-026]. Are NNC satisfied that all relevant local roads have now been included and are there any comments on the submitted report?</p>	<p>The Applicant notes that this matter is agreed within the <b>North Northamptonshire Council Statement of Common Ground [REP5-098]</b> under matter TA-10.</p>
Q3.7.3	The Applicant	<p><b>Fields GF9 and GF13</b></p> <p>Following the Applicant's Comments on Responses to ExA Second Written Questions [REP4-019] reference LPC-001 Q2.13.5, has there been any progress on the Applicant's submission to the Local Plan consultation, noting that the consultation period was due to expire 16 February 2026.</p>	<p>The Applicant submitted a representation to the Regulation 19 MK City Plan 2050 consultation on the 12/02/2026. A copy of the representation is included in Appendix A of this response document.</p> <p>The Applicant notes that Green Hill G is within the preferred area for solar development, in line with emerging Policy GS7 and therefore, the principle of development for the Scheme is considered acceptable.</p> <p>The Applicant also notes that Milton Keynes recognises the importance of low and zero carbon energy production, including solar farms to help meet the UK's wider 2050 net zero carbon emissions through emerging Policy CEA6.</p> <p>However, the Applicant raised concerns about elements of emerging policy in relation to the Special Landscape Area as shown on the Policies Map, which is set out in emerging Policy CEA12.</p> <p>The Applicant responded to Part C of emerging policy CEA12, submitting that Green Hill G should not be included in the proposed extension of the SLA as it does not contribute to the purposes of the SLA. Green Hill G is also proposed to be designated under emerging policy GS7 as a preferred area for both solar and wind development. Whilst the Applicant is mindful that policy designations may overlap, where this occurs the policies will typically be compatible with each other. However, the Council has highlighted that these policies are in conflict during the DCO examination, stating that the proposed solar development at Green Hill G would be detrimental to the character of the Special Landscape Area, while, at the same time, designating that area as a preferred area of search for solar within its emerging Local Plan.</p>
Q3.7.4	Applicant and MKCC	<p><b>Statement of Common Ground</b></p> <p>In the latest SoCG, Revision A [REP4-031] all Landscape and Visual matters appear to still be 'under discussion' with the position stated as 'the Applicant awaits the Council's comments'. Please can you provide an update on the progress of discussions and indicate if it is likely that these will be resolved prior to the close of the Examination.</p>	<p>The Applicant has sought to engage with the Council's landscape officer but there has been limited dialogue. The Applicant met with the landscape officer on the 28<sup>th</sup> January 2026 to discuss outstanding matters under the Statement of Common Ground (SoCG) but unfortunately, this was deferred due to Officers being unable to provide comment on the SoCG at that time. A further meeting was organised for 12<sup>th</sup> February 2026 however, this was deferred at the request of Milton Keynes.</p> <p>More detailed comments were received 22<sup>nd</sup> March 2026 with some matters agreed but it is the Applicant's position that there is likely to be little progress made on the other matters. An updated Statement of Common Ground will be submitted at Deadline 7.</p>



## 2.8 Minerals

ExQ	Respondent	Question	Applicant's Response
Q3.8.1	Ecton Estate	<p><b>Further information on consented minerals development</b></p> <p>Further to your Deadline 4 submission [REP4-048] could you assist the ExA by explaining exactly which section of the Applicant's proposed cable route would sterilise an area of consented minerals development (ideally including a plan showing the extent of the area of minerals to be worked).</p> <p>Could you also provide details of the consented minerals development to which you refer, including the planning application reference, date of permission, nature of minerals to be extracted, expected timescales for working at the site, and any other information that you consider it would be helpful for the ExA to know.</p> <p>Finally, could you set out what changes you would be seeking the Applicant to make to their proposed cable route to address your concerns.</p>	<p>The Applicant notes that this question is not directed at the Applicant.</p>



## 2.9 Socio-economic effects

ExQ	Respondent	Question	Applicant's Response
Q2.15.1	The Applicant	<p><b>Assessment of socio-economic impacts against local planning policies</b></p> <p>NPS EN-1 sets out that Applicants should refer to how the development's socio-economic impacts correlate with local planning policies. Is this information provided anywhere?</p>	<p>Section 17.3 of <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b> identifies local policies that are of most relevance to socio-economic impacts.</p> <p>The consideration of how the Scheme correlates to and complies with these policies is set out through the <b>Policy Compliance Document (Revision B) [REP4-014]</b>. The Applicant considers the Scheme is compliant with the policies identified and assessed for their compliance.</p>
Q3.9.1	The Applicant	<p><b>Effects on long-distance routes</b></p> <p>The Northamptonshire Boundary Walk would pass between fencing and new/reinforced hedgerow and planting in Site F, sections of the Three Shires Way would pass fencing and new hedgerow in Site G, and the Milton Keynes Boundary Walk would pass between fencing and new planting in Site G (sources: Environmental Statement Figure 17.3 Long-Distance Recreational Routes [APP-466], Landscape and Ecology Mitigation Plans [REP1-113] and [APP-219] and Works Plan Revision D [REP3-008]). Would these long-distance routes feel less safe to some users at these points, with a resulting harmful effect?</p>	<p>The Applicant has responded to matters of perceptions of safety on rural recreational routes previously in response to Q2.16.8 in <b>Applicant's Responses to ExA Second Written Questions [REP3-074]</b>.</p> <p>The routes described all currently are bound on one side by either trees, hedgerows or ditches, and in the case of the Three Shires Way, by trees and a partially-hedged bank for a substantial distance before going into the woodland itself. In response to Q3.10.13, the Applicant has prepared a photomontage from viewpoint 51 <b>[EX6/GH8.2.19]</b> which provides an additional visualisation for this section of the Scheme. The Applicant has acknowledged that change to the sense of enclosure along PROWs (and thus on the identified long-distance routes) may result in some users feeling discouraged from using those routes or have reduced enjoyment of using those routes. The extent to which this discouragement manifests as a change to the perception of safety is very much dependent on the individual user, and the experience is very unlikely to be universal, and thus any consideration of a 'harmful' effect should be determined with this context. The sense of change to user experience has taken into account visual changes, and sense of enclosure as contributing factors to the assessment of likely effect to use of these routes, particularly during the operational lifetime of the Scheme. Therefore, as the Scheme has been designed to allow for indicative spacing between hedgerows along PROWs of approximately 10-15 metres, with fencing set behind planting in locations both are proposed, and with the addition of improved permissive access options and the attractiveness of ecological mitigation planting along these routes, no significant adverse effects to user experience is anticipated overall as assessed in <b>ES Appendix 17.1: Tourism and Recreation Receptor Tables (Revision A) [REP1-079]</b>.</p>
Q3.9.2	The Applicant	<p><b>Effects on public rights of way</b></p> <p>REP3-109 submits that paths that are enclosed by hedgerows on either side tend to get muddy in the winter months. Does the Applicant consider that harm to the accessibility of public rights of way could result from boggy surfaces caused by the enclosure of paths on either side by new or reinforced hedgerow or planting as a result of the proposed development?</p>	<p>The Applicant has sought to ensure that where public rights of way (including specifically the bridleways on Green Hill G to which REP3-109 is referring) are planted with hedgerows on either side, either by new or reinforced hedgerows, that there is a suitably wide corridor for movement to be unhindered, or to be no narrower than existing conditions.</p> <p>On the <b>ES Figures 4.10-4.20 Landscape and Ecological Mitigation Plans</b> (as revised) <b>[EX6/GH6.4.4.10_D, EX6/GH6.4.4.11_C, APP-209, REP-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/GH6.4.4.10_B]</b> the indicative spacing between hedgerows along PROWs is approximately 10-15 metres. Whilst this will have some sense of enclosure to users, this width will allow sufficient space for sun and wind to evaporate water from surfaces better than more narrowly enclosed PROWs. This is said in reference to the Three Shires Way / bridleway Lavendon 002 which presently has in some places less than 5 m of clearance between the trees of Threeshires Wood and existing bank and hedgerows (consider Viewpoint 51 Photography and Photomontages <b>[EX6/GH8.2.19]</b> as an example of this). Alongside the Threeshires Wood, the offset between the existing woodland edge and the proposed new native hedgerow is 15-20m wide.</p> <p>Whilst the Applicant cannot state users would not need to navigate around boggy surfaces in wet conditions, it is not considered that the Scheme would make a material different to existing PROW conditions.</p>
Q3.9.3	The Applicant	<p><b>Effects on Glebe Farm/The Meadows business</b></p>	<p>Road closures may be required for the construction of access points CR12 and CR13, and are likely to be required for the construction of the Cable Route Corridor. All of these features lie between</p>



ExQ	Respondent	Question	Applicant's Response
		The Applicant states at ELD-004 of their Responses to Written Representations at Deadline 1 document [REP2-048] that any road closures of Doddington Road, Earls Barton would be solely between Glebe Farm and the A45 junction, and that these would be "prioritised for nighttime works". Where are these two matters secured?	<p>Glebe Farm and the junction of Doddington Road and the A45. These matters are dictated by the <b>Works Plan (Revision G) [EX6/GH2.4_G]</b> and the <b>Access to Works Plan (Revision A) [REP3-014]</b>. Access point CR14 is located on Doddington Road to the west of Glebe Farm (at Mill Lane), however it is not known at this stage if this would require road closures to be constructed. This will be confirmed at the detail design stage.</p> <p>Optionality for nighttime working is set out in the <b>Outline Construction Environmental Management Plan (Revision C) [EX6/GH7.1_C]</b> and the <b>Outline Construction Traffic Management Plan (Revision C) [EX6/GH7.9_C]</b>, specifically in relation to cable installation works and where it is deemed to be necessary. Whilst these do not explicitly commit to nighttime working in these locations, that optionality is available and any details pertaining to these documents are to be approved by the local planning (and highways) authorities in respect of the discharge of Requirements 13 and 15 in Schedule 2 to the <b>Draft DCO (Revision E) [EX6/GH3.1_E]</b>.</p>
Q3.9.4	The Applicant	<p><b>Village Hopper bus service</b></p> <p>Would the proposed development avoid potential disruption to the Village Hopper bus service, raised by Cogenhoe and Whiston Parish Council in [REP4-037]? If not, how would such disruption be mitigated?</p>	<p>The Applicant has reviewed the October 2025 timetable for the Village Hopper bus as hosted at <a href="https://www.cogenhoeandwhiston-pc.gov.uk/village-hopper-bus">https://www.cogenhoeandwhiston-pc.gov.uk/village-hopper-bus</a> to answer this question and has inferred the bus route from the timetabled stops.</p> <p>Construction traffic associated with the Scheme will interact with the Village Hopper bus route in the following locations:</p> <ul style="list-style-type: none"> <li>• On Station Road (between Cogenhoe and Grendon) as a result of HGV access to Green Hill BESS, and the Cable Route Corridor (CR17) – this is largely avoided by most of the timetable indicating that the Village Hopper routes through Whiston and Castle Ashby during much of the working day;</li> <li>• Cable Route Corridor Access (CR18) and adjacent cable construction works crossing Station Road near Grendon;</li> <li>• West of Easton Maudit as a result of HGV access to Green Hill F (Crossing F-1);</li> <li>• Easton Lane, between Easton Maudit and Bozeat as a result of HGV accesses F-2 and CR23;</li> <li>• HGV access to Access F-1 on the A509; and</li> <li>• Around Earls Barton (as the Village Hopper has a request stop available on some route times) as a result of access to the Cable Route Corridor and cable construction works crossing Doddington Road, the A45, and Station Road.</li> </ul> <p>Traffic effects are mitigated by the measures set out in <b>Outline Construction Traffic Management Plan (Revision C) [EX6/GH7.9_C]</b>, which is secured by Requirement 15 in Schedule 2 to the <b>Draft DCO (Revision E) [EX6/GH3.1_E]</b>. This includes management of HGV delivery times and frequency, and traffic management measures to control general traffic flow and safety. These measures would have to be agreed in detail with the local highway authority as in respect of the discharge of the relevant DCO Requirement. These measures have been assessed in <b>ES Chapter 13: Transport and Access [REP2-003]</b> as anticipated to mitigate road vehicle user delay (including public transport) to no more than a minor adverse effect (which is not significant).</p>
Q3.9.5	Cogenhoe and Whiston Parish Council	<p><b>Village Hopper bus service route map request</b></p> <p>Please provide a full route map for the Village Hopper bus service referred to in your representation [REP4-037].</p>	The Applicant notes that this question is not directed at the Applicant.
Q3.9.6	Trescella and Ben Elderton	<p><b>Effects on Glebe Farm/The Meadows business</b></p> <p>Please explain any evidence which supports the assertions regarding the proposed development's potential effect on the viability of both the agricultural and farm shop elements of the Glebe Farm/The Meadows business.</p>	The Applicant notes that this question is not directed at the Applicant.



## 2.10 Transportation and traffic

ExQ	Respondent	Question	Applicant's Response
Q3.10.1	The Applicant	<p><b>Effects of traffic management measures</b></p> <p>Has an assessment been made of the potential effects of traffic management measures on surrounding highways? For example, the Order would permit street works, alteration of layout, temporary closure and traffic regulation measures on Kettering Road (Walgrave) up to its junction with the A43 and Doddington Road, Earls Barton close to the A45. Could traffic management measures associated with the proposed development affect congestion and safety on other routes, including the Strategic Road Network?</p>	<p>Provision for traffic management measures, where considered necessary, are secured through the <b>Draft DCO (Revision E) [EX6/GH3.1_E]</b> and detailed in the <b>Outline Construction Traffic Management Plan (Revision C) [EX6/GH7.9_C]</b>,</p> <p>The starting point for any access will be to ensure it can operate without traffic management. Where traffic management is considered necessary through agreement with the highway authorities, a process secured through the oCTMP <b>[EX6/GH7.9_C]</b>, this can take the form of elements such as bankmen or temporary reductions in speed limits. Wider measures such as restricted movements or signal control may be utilised.</p> <p>None of the traffic management measures currently envisaged are considered likely to have an impact on congestion and safety on other roads given the scale and duration of the measures.</p> <p>In all instances measures will need to be agreed by the highway authorities and due consideration of the effects on congestion will be made. The primary purpose of the traffic management will be to ensure safety and so those effects are embedded. Further, the commitments made in the <b>Outline Construction Traffic Management Plan (Revision C) [EX6/GH7.9_C]</b> to avoid traffic movements associated with the Scheme during the busiest periods of the day will minimise congestion.</p>
Q3.10.2	The Applicant	<p><b>Access to Glebe Farm shop</b></p> <p>Assuming that the Cable Route Corridor on Doddington Road, Earls Barton would form part of the northern interconnection works, the Outline Construction Traffic Management Plan [REP3-064] (at Page 12) shows an indicative construction period of approximately 17 months at this location. Whilst it is appreciated that not all elements of the Cable Route Corridor would be constructed concurrently, what assurances can be given that traffic management measures on Doddington Road would not deter customers of the Glebe Farm shop, with a harmful effect on the business?</p>	<p>Traffic management measures to be utilised on Doddington Road for controlling HGV access to CR12 and CR13, and where necessary to accommodate cable construction works, are set out in <b>Outline Construction Traffic Management Plan (Revision C) [EX6/GH7.9_C]</b>, which is secured by Requirement 15 in Schedule 2 to the <b>Draft DCO (Revision E) [EX6/GH3.1_E]</b>. This includes management of HGV delivery times and frequency, and traffic management measures to control general traffic flow and safety. These measures would have to be agreed in detail with the local highway authority as in respect of the discharge of the relevant DCO Requirement. These measures have been assessed in <b>ES Chapter 13: Transport and Access [REP2-003]</b> as anticipated to mitigate road vehicle user delay to no more than a minor adverse effect (which is not significant).</p> <p>As a result, it is not anticipated that customers of Glebe Farm would be significantly impacted from accessing the shop, and it is therefore not anticipated that there would be any significant or long-term harmful effect to the business. Whilst traffic management measures may be in place for the duration of the construction of the Cable Route Corridor, these would likely only be in use during work activities (constructing the access points, or when burying cables) or when HGVs are delivering to these access points.</p> <p>The precise nature of any traffic management, which may only be necessary at specific times and could include slow traffic through lower speeds rather than restricting movements, will be agreed with the highway authority. This will necessarily need to ensure disruption to road users, including visitors to the Glebe Farm shop is minimised.</p> <p>For example, for HGV movements, traffic regulation measures such as temporary lights or stop boards would only be used when HGV movements are occurring, rather than being continuously used throughout the day. This would have to be determined in detail as part of discharge of Requirements 13 and 15 in Schedule 2 to the <b>Draft DCO (Revision E) [EX6/GH3.1_E]</b>.</p>
Q3.10.3	The Applicant	<p><b>Status of permissive paths in Landscape and Ecology Mitigation Plan keys</b></p> <p>Cyclists are not listed where the Landscape and Ecology Mitigation Plan (LEMP) keys depict permissive paths for pedestrians and equestrians, although the Outline Public Rights</p>	<p>Permissive paths are categorised by use either for pedestrians, or those for use by pedestrians and equestrian users.</p>



ExQ	Respondent	Question	Applicant's Response
		of Way and Permissive Paths Management Plan (Revision B) [REP3-066] states that cyclists would be able to access these paths. Please update the LEMP as necessary.	<p>The <b>Draft DCO [EX6/GH3.1_E]</b> has been updated to clarify permitted cycle use for permissive paths. This has included a new Work No.10C – permissive paths for pedestrian, cycle and equestrian users.</p> <p>The <b>Public Rights of Way and Permissive Path Management Plan [EX6/GH7.10_C]</b> and <b>Chapter 4: Scheme Description [EX6/GH6.2.4_B]</b> has been updated to confirm where cycle users are permitted. The <b>Works Plans [EX6/GH2.4_G]</b> and relevant Landscape and Ecology Mitigation Plans have been amended to reflect these updates. Not all permissive paths will permit equestrian and cycle use. Following discussions with landowners, the permissive paths within Green Hill F will remain pedestrian only or pedestrian and equestrian use only, to more closely reflect existing permissive horse riding arrangements.</p> <p>The following updated figures have been submitted for Deadline 6:</p> <ul style="list-style-type: none"> <li>• ES Figure 4.10: Landscape and Ecology Mitigation Plan A (Revision D) <b>[EX6/GH6.4.4.10_D]</b></li> <li>• ES Figure 4.11: Landscape and Ecology Mitigation Plan A.2 (Revision C) <b>[EX6/GH6.4.4.11_C]</b></li> <li>• ES Figure 4.14: Landscape and Ecology Mitigation Plan E_Sheet 1 (Revision C) <b>[EX6/GH6.4.4.14_C]</b></li> <li>• ES Figure 4.15: Landscape and Ecology Mitigation Plan E_Sheet 2 (Revision C) <b>[EX6/GH6.4.4.15_C]</b></li> </ul>
Q3.10.4	The Applicant	<p><b>Permissive path through Site D</b></p> <p>Please explain why the permissive path parallel with and close to Public Footpath NN/TN/3 is proposed. Please also confirm whether the permissive path would meet the highway at its northern terminus.</p>	<p>The permissive path in Green Hill D has been proposed as a means of reconciling differences between the definitive route of footpath NN TN 3, and the route as walked 'on the ground'. This has been proposed as a permissive path due to the temporary (albeit long-term) operational lifetime of the Scheme, and the requirement for the land to be returned to agricultural use post-decommissioning.</p> <p>The proposal ensures that the currently walked route is retained throughout the operational lifetime of the Scheme, while also ensuring the definitive route of the footpath is maintained (even if used to a lesser extent as at present).</p> <p>The Applicant confirms that the permissive path joins onto footpath NN TN 3 at both the northern and southern terminus at the point where the definitive footpath route meets the highway boundary at its waymarked location. This is shown on the <b>Works Plan (Revision G) [EX6/GH2.4_G]</b> and <b>ES Figure 4.13.1 Landscape and Ecology Mitigation Plan C and D (Revision C) [EX6/GH6.4.4.13.1_C]</b>.</p>
Q3.10.5	The Applicant	<p><b>Access between permissive path and public footpath, Site E</b></p> <p>The Landscape and Ecology Mitigation Plan E Sheet 2 (Revision B) [REP3-050] does not show a gap in the planting along the western boundary of Field EF33, opposite the termination point of Footpath NN/TN/2 on the west side of Earls Barton Road. Such a gap would ensure that the public could pass between the permissive path and the public footpath with minimal roadside walking. Would a gap be provided?</p>	<p>The Applicant confirms this is a drawing error on the respective LEMP figure. <b>ES Figure 4.15: Landscape and Ecology Mitigation Plan E_Sheet 2 (Revision C) [EX6/GH6.4.4.15_C]</b> has been updated to show the hedgerow gap at the point where users of NN TN 2 can pass across to the proposed permissive path.</p> <p>The Applicant has not considered a hedgerow gap at this point necessary as access between NN TN 2 and the permissive path can be made 100 m to the north by means of the access track onto Mears Ashby Road. Whilst this involves approximately 1-1.5 minutes of walking on the road, this is a notable decrease from the approximately 250 m (2.5-3.5 minutes) of walking on the road currently required to access between NN TN 1 and NN TN 2. Furthermore, this option utilises an existing access point rather than creating a new hedgerow gap opposite NN TN 2.</p>
Q3.10.6	The Applicant	<p><b>Status of proposed permissive path, Site E</b></p> <p>The Tourism and Recreation Receptor Tables (Revision A) [REP1-079] refer at Page 54 to "onwards permissive/informal routes directly impacted by Green Hill E". Is the proposed</p>	<p>The permissive path in Green Hill E from BOAT NN TN 10 to Earls Barton largely follows an existing field access route. There is clear aerial and 'on-the-ground' evidence that this route is used for recreation up to the Field Barn or the adjacent field EF27 as a 'there-and-back' route,</p>



ExQ	Respondent	Question	Applicant's Response
		permissive path between Mears Ashby Byway Open to All Traffic TN/010 and Earls Barton currently a permissive path, or does a permissive path exist near to it?	<p>however there is no evidence of what formality this arrangement has (no signage, notices, nor specific commentary from the relevant landowner at the time of DCO examination). As such, the assessment in <b>ES Appendix 17.1: Tourism and Recreation Receptor Tables (Revision A) [REP1-079]</b> has taken a precautionary approach to ensure all recreational users in this location have been assessed as part of the assessment of BOAT NN TN 10.</p> <p>The Applicant has shown this on drawing <b>8.2.8 Public Rights of Way and Permissive Paths Plan [REP4-025]</b> to demonstrate the extent to which the proposed formalised permissive access route follows the existing route as used.</p>
Q3.10.7	The Applicant	<p><b>Connection of permissive path to highway, Site E</b></p> <p>The southern terminus of the permissive path between Mears Ashby Byway Open to All Traffic TN/010 and Earls Barton is not shown to meet the A4500 road on the Landscape and Ecology Mitigation Plan E Sheet 2 (Revision B) [REP3-050]. Please confirm that the path would connect two highways and amend any necessary documents.</p>	<p>The Applicant confirms this is a drawing error on the respective LEMP figure. <b>ES Figure 4.15: Landscape and Ecology Mitigation Plan E_Sheet 2 (Revision C) [EX6/GH6.4.4.15_C]</b> has been updated to proposed permissive path meeting the highway boundary.</p> <p>The Applicant confirms the northern end of this route is connected to byway open to all traffic NN TN 10.</p>
Q3.10.8	The Applicant	<p><b>Design of permissive path, Site E</b></p> <p>The majority of the permissive path between Mears Ashby and Earls Barton would be adjacent to grassland or wildflower meadow, to at least one side, as shown on the Landscape and Ecology Mitigation Plan E Sheet 2 (Revision B) [REP3-050]. However, much of the path would be enclosed by proposed hedgerow or tree planting, with hedgerow being maintained to an optimum height of 4-4.5m tall [REP3-062]. In parts (for example, where the path would pass fields EF22 and EF21) the proposed path is shown on REP3-050 as a relatively narrow feature (minimum width 3.0 metres as set out in REP1-151) between potentially tall planting on both sides. The resulting sense of enclosure may cause some path users to have personal safety concerns. Could the design of the permissive path be altered so that the openness of much of the surrounding areas of the development could support the confidence of all users to use the path?</p>	<p>While a minimum width of 3.0 m has been proposed in the <b>Concept Design Parameters and Principles (Revision C) [EX6/GH7.17_C]</b>, the Applicant confirms this is the minimum usable width of the permissive route surface, not the minimum width between bounding features. The Applicant has sought to balance how enjoyable the user experience in respect of route enclosure, perception of safety, but also screening of views of Solar PV infrastructure, and where necessary providing physical separation between permissive route users and ecological mitigation areas that preferably are not disturbed by people walking, cycling, or by dogs and horses.</p> <p>The <b>Outline Landscape and Ecological Management Plan [EX6/GH7.4_E]</b> has been updated to secure the management of hedgerow along the western edge of EF20 at a lower height of 1.5m. The retention of planting along the permissive path is beneficial as it discourages users from straying into the ecological mitigation fields.</p>
Q3.10.9	The Applicant	<p><b>Utility of some permissive paths, Site F</b></p> <p>The proposed permissive paths throughs Field FF6 and Field FF11 would reduce journey time between public rights of way by a modest degree for some path users, depending on their destination, by removing the need to walk a "dog leg" formed by paths in the vicinity. However, given the similar distances between the existing and proposed routes, the time saving would be minimal. How beneficial would the proposed permissive paths be?</p>	<p>The Applicant acknowledges that savings in some journey times between PROWs at FF6 and FF11 would be modest: in field FF6, the saving is ~350 m (approximately 4.5 minutes), and in FF11 the saving is ~100 m (approximately 1 minute). However, the Applicant seeks to clarify that this is not the primary reason for these permissive paths being included in the Scheme.</p> <p>The permissive paths act as additional links between PROWs, improving optionality, and responding to anticipated desire lines within fields FF6 and FF11. As such, these permissive paths help to define the edges of ecological mitigation planting within these fields, and direct users to the periphery rather than desire lines through ecological mitigation or habitat improvement areas being used.</p>
Q3.10.10	The Applicant	<p><b>Utility of permissive path, Site F</b></p> <p>The eastern terminus of the permissive path through Field FF33 would be onto a section of the A509 road. Access between the path and Bozeat, the nearest village, would be via the A509 and London Road. The A509 is subject to high traffic flows, as set out in Chapter 3 of the Environmental Statement [REP1-029]. There is an absence of public rights of way which would offer an alternative to walking on the highway in the vicinity, and no footways are indicated along the roads referred to. How beneficial would the proposed permissive path be, given that these considerations may deter public access to the path?</p>	<p>The permissive path terminating at the A509 adjacent to Field FF33 is located to formalise an existing permissive access which is evident by a kissing gate that allows access from the A509 towards Horn Wood for pedestrian users. Much like the permissive path in Green Hill E, this is clear evidence for use, even if it is not recorded, or part of landowner discussions prior to submission.</p> <p>While high traffic volumes on the A509 and walking along the highway on London Road towards Bozeat may not be desirable to some people, this is a route apparently used at present, and so therefore the Applicant has sought to formalise this level of access throughout the operational lifetime of the Scheme. The Applicant also notes that the permissive path accesses the A509/London Road junction at a point where verges are sufficiently wide enough for pedestrians to cross the road and walk along verges to access London Road away from the junction. The Applicant also acknowledges that while the A509 is a busy road, at-grade crossings for PROWs</p>



ExQ	Respondent	Question	Applicant's Response
			exist in multiple locations, including at footpaths NN TA 17 (between Green Hill F and Bozeat) and Warrington 007 (immediately northwest of Green Hill G).
Q3.10.11	The Applicant	<p><b>Utility of permissive path, Site F</b></p> <p>Would the main benefits of the permissive bridleway from Easton Lane and through Field FF26 be to patrons of the Low Farm equestrian business, as the route exits onto Easton Lane which appears to be subject to a national speed limit with an absence of footways, and so may not be attractive to pedestrians, equestrians and cyclists?</p>	<p>Whilst patrons of Low Farm are likely to benefit from the permissive bridlepath in this location, these are not intended to be the sole recipients. The permissive bridlepath is intended to improve route options for PROW users around Easton Maudit, and for those travelling to and from Bozeat. Whilst it is acknowledged the Easton Lane is national speed limit and without footpaths, it is understood that despite this, it is a preferred route for recreational or non-vehicular users between Bozeat and Easton Maudit as it cross the A509 on an overpass rather than at grade. Pedestrians also benefit further from the permissive footpath link in the north of field FF25 which avoids a further ~450 m (approximately 5.5 minutes) of walking on the highway by linking to the A509 overpass wherefrom either footpath or verge walking to Bozeat is available.</p> <p>Cyclists are not permitted along these permissive paths within Green Hill F due to an existing informal agreement with local livery businesses that use these routes.</p>
Q3.10.12	The Applicant	<p><b>Utility of permissive path, Site G</b></p> <p>The proposed permissive path between Fields GF6 and GF9 would reduce journey time between public rights of way by a modest degree for some path users, depending on their destination, by removing the need to walk a "dog leg" formed by paths in the vicinity. However, given the similar distances between the existing and proposed routes, the time saving would be minimal. How beneficial would the proposed permissive path be?</p>	<p>As set out in response to question Q3.10.9, the Applicant acknowledges that savings in journey times between PROWs at GF6-9 would be modest: the saving is ~200-350 m (approximately 2.5-4.5 minutes) depending on whether users use the definitive PROW routes or use existing field tracks. However, the Applicant seeks to clarify that this is not the primary reason for these permissive paths being included in the Scheme.</p> <p>The permissive paths act as additional links between PROWs, improving optionality, and responding to anticipated desire lines between Lavendon 005 and Lavendon 002 and  009. As such, these permissive paths help to define the edges of ecological mitigation planting within these fields, and direct users to the periphery rather than desire lines through ecological mitigation or habitat improvement areas being used.</p>
Q3.10.13	The Applicant	<p><b>Photomontage request: Site G</b></p> <p>Please provide a photomontage showing all post-construction views from Viewpoint 51 adjacent to Threshire Wood [APP-313 and APP-384]. This should be a fully verifiable (Type 4), fully rendered (AVR Level 3) visualisation in accordance with the Landscape Institute TGN 06/19, as will be the case for the additional photomontages from other parts of the site (MS-008 in [REP4-022]).</p>	<p>Please see <b>Additional Viewpoint Photography and Photomontages VP51 [EX6/GH8.2.19]</b> for the viewpoint and photomontage of Viewpoint 51. This has been shared with Milton Keynes City Council on the 18 March 2026.</p> <p>The additional viewpoints requested by Milton Keynes Landscape Officer have been submitted at Deadline 5 [REP5-094, REP5-095 and CR2-019] and 'Option B' in relation to Change Request 2 – [CR2-020].</p>
Q3.10.14	The Applicant	<p><b>Duration of any public rights of way diversions</b></p> <p>The Outline Public Rights of Way and Permissive Paths Management Plan Revision B [REP3-066] states (at 3.3.2) that it is not anticipated that any long-term public right of way diversions or diversions of more than a day would be required. The oOEMP Revision B [REP4-008] appears (in Table 3.7) to envisage "no diversions or closures", but also states that "any public right of way temporarily diverted during the construction phase will be reinstated during the operational phase", suggesting a longer period than the single day referred to in the first plan. Please clarify how long any public right of way diversions are envisaged to last.</p>	<p>The wording referred to under paragraph 3.3.2 of the <b>Outline Public Rights of Way and Permissive Paths Management Plan [EX6/7.10_C]</b> relates to management of potential diversions and/or closures during the construction phase, and has been updated accordingly to ensure that clarity on the provision of PROW diversions and closures is provided.</p> <p>As set out in paragraph 3.3.1 <i>'it is expected that PROWs will remain open throughout the construction period with management to ensure the safety of all PROW users so far as is practicable to do so'</i> going onto confirm that <i>'it is not anticipated that any long term PROW diversions will be required, with any necessary diversions limited to as short a duration as is practicable.'</i> [amended text]. The plan text goes on to state that <i>'should an instance arise where PROWs are temporarily affected and its diversion is not possible, the PROW may be temporarily closed or restricted.'</i> This demonstrates a hierarchical sequencing in the preferred approach by the Applicant to maintain PROWs as open, with short-duration diversions as required, with closures only required where diversions are not possible. The Applicant is not able to commit to exact timings as they will depend on the nature of works being undertaken at each PROW crossing or interaction. However, the Applicant has repeatedly committed to ensuring these diversions, or if necessary, closures, are as short a duration as is practicable or reasonably necessary. Furthermore, the provision of details of these measures is secured by Requirement 18 of the</p>



ExQ	Respondent	Question	Applicant's Response
			<p><b>Draft DCO [EX6/GH3.1_E]</b>, which will require the relevant highway or PROW authority to approve these measures and any specific PROW diversions or closures.</p> <p>The management of PROW and permissive paths during the operational phase is discussed under Section 4 of the <b>Outline Public Rights of Way and Permissive Paths Management Plan [EX6/GH7.10_C]</b>. Day-to-day operational and maintenance vehicles may cross PROWs during visits to the Site; however this will be infrequent at less than one visit per day per Site for maintenance purposes, similar to the existing farming activities. Paragraph 4.3.5 confirms that during any replacement activities, PROWs and the permissive paths will be managed in the same way as outlined for the construction phase. The clear objective will be to retain the operation of all PROWs and permissive paths. The continued and safe operation of each will be the overriding aim.</p> <p>The <b>Outline Operational Environmental Management Plan [EX6/GH7.2_D]</b> has been updated to clarify the measures for operational maintenance and operational replacement.</p>
Q3.10.15	The Applicant	<p><b>Offset of the proposed development from public rights of way</b></p> <p>The Concept Design Parameters and Principles (Revision A) [REP1-151] set out that solar panels would be offset from the centreline of public rights of way by 15 metres. Would public rights of way which pass between panels on both sides therefore pass through an area between panels of a total width of 30 metres (excluding any fencing, hedgerow etc within this)?</p>	<p>Within the Scheme, there is only one section of PROW, where Solar has been proposed immediately to both sides of the route - NN TA 4#1 (TP181) within field FF4 to the north of Easton Maudit and east of Grendon. This section of PROW can be seen on <b>Environmental Statement Figure 4.17 Landscape and Ecology Mitigation Plan F Sheet 1 (Revision B) [REP3-052]</b>. Here, the PROW passes through field FF4. A 15m offset from the PROW to the proposed fenceline has been allowed for on both sides (as a minimum), and then an offset of 4m from proposed fenceline to the proposed panels. This gives a total width of 38m from panel to panel along the route of the PROW.</p> <p>This situation also briefly occurs between fields GF1 and GF4. Here there is also a 15m offset from the PROW to the proposed fence line on both sides (as a minimum), and then an offset of 4m from the proposed fenceline to the panels. This gives a total width of 38m from panel to panel along the route of the PROW. This section of PROW can be seen on <b>ES Figure 4.20 Landscape and Ecology Mitigation Plan G (Revision B) [EX6/GH6.4.4.20_B]</b>. Cross sections showing examples of offsets, including 15m from PROW are outlined in <b>Figure 2.21 [APP-220]</b>.</p> <p>There are other examples of PROW passing alongside solar array, however where this has occurred, the layout of the Scheme has been designed so that solar infrastructure is directly along one side of the route. An example of this can be seen within Site F within field FF11 where PROW NN TD 2 (TP184) passes to the north of the panels within this field, here the northern section of the field has been put to Tussock Grassland. This section of PROW can be seen on <b>Environmental Statement Figure 4.17 Landscape and Ecology Mitigation Plan F Sheet 1 (Revision B) [REP3-052]</b>.</p> <p>In other locations PROW are typically separated from the array on one side by existing features within the landscape such as hedgerows and woodland. An example of this can be seen within Site F along the northern boundary of field FF19 where PROW NN TA 3 (TP185) passes along the southern side of an existing hedgerow. Panels are proposed with the field to the south of the PROW (FF19), and also within the field to the north (FF18) beyond the adjacent hedgerow. To the south, the proposed fenceline has been offset by a minimum of 15m, and then an offset of 4m from the proposed fenceline to the panels. This gives a total minimum width of 19m from the PROW to the panels. To the north, immediately there is the adjacent hedgerow, and then a minimum of 15m from the hedgerow to the proposed fenceline, and then a further 4m from the proposed fenceline to the proposed panels. This results in the proposed panels being offset a minimum of 19m from the existing hedgerow and no new planting proposed within the 30m strip. This arrangement is typical across the Scheme. This section of PROW can be seen on</p>



ExQ	Respondent	Question	Applicant's Response
			<b>Environmental Statement Figure 4.17 Landscape and Ecology Mitigation Plan F Sheet 1 (Revision B) [REP3-052].</b>
Q3.10.16	The Applicant	<p><b>Provision for existing public rights of way on the sites</b></p> <p>The Non-Technical Summary (Part 1) [APP-543] and Chapter 17 (Socio-Economics, Tourism and Recreation) [APP-054] state that "The Scheme also features provision for enhancement to existing public rights of ways on the Sites, through repairing, upgrading and replacing existing public rights of way furniture, such as signs, gates, and re-establishing hedgerows gaps". Please signpost where this provision is set out.</p>	The provisions set out under Section 4 in the <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [EX6/GH7.10_C]</b> as secured by Requirement 18 of the <b>Draft DCO Revision E [EX6/GH3.1_E]</b> include for the repair and making good of any PROW furniture, signage, and clearance of hedgerow gaps within land under freehold acquisition by the Applicant, as part of their obligations to maintain PROWs in good condition throughout the operational lifetime of the Scheme.
Q3.10.17	The Applicant	<p><b>Site G access track</b></p> <p>An access to site G through the hedgerow located along the western boundary of Field GF9 is referred to at Q2.7.3 of the Applicant Responses to ExA Second Written Questions [REP3-074]. How would this access track affect the Three Shires Way, any other public rights of way in the vicinity, or the permissive footpath? Could the access track be depicted on the Works Plan, for clarity?</p>	<p>For users of recreational routes around this location, the access track would present as an area of aggregate surfacing that can easily be walked, wheeled, or ridden across. Gated sections would be set back from any publicly accessible areas, at the point access to securely fenced areas is taken. The Applicant refers to photomontages 29 <b>[APP-362]</b> and NN9 <b>[APP-396]</b> (Green Hill F) showing how this might look. The use of access tracks, such as the referred track at GF9, during the operational lifetime of the Scheme would be sporadic and largely by light vehicles such as 4x4s accessing the site for general maintenance. As such, impacts on recreational users would be negligible (and have been considered as such in the assessment in <b>ES Appendix 17.1: Tourism and Recreation Receptor Tables (Revision A) [REP1-079]</b>).</p> <p>Access tracks for maintenance fall under Work No. 6(e) of Schedule 1 to the <b>Draft DCO [EX6/3.1_E]</b> and are therefore not depicted individually. Instead they may be placed in any location denoted by Work No. 6 on the <b>Works Plan (Revision G) [EX6/GH2.4_G]</b>, while their location on the indicative masterplans and LEMP figures are indicative only.</p>
Q3.10.18	The Applicant	<p><b>Funding of public rights of way upgrades</b></p> <p>If potential upgrades to public rights of way infrastructure within the scheme would be funded by the separate community benefit fund (as suggested at Table 17.2, Page 15 of Chapter 17 Socio-Economics Tourism and Recreation [APP-054]), would these be benefits of the scheme?</p>	<p>The provisions set out under Section 4 in the <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [EX6/GH7.10_C]</b> as secured by Requirement 18 of the <b>Draft DCO [EX6/GH3.1_E]</b> include for the repair and making good of any PROW furniture, signage, and clearance of hedgerow gaps within land under the control of the Applicant, as part of their obligations to maintain PROWs in good condition throughout the operational lifetime of the Scheme.</p> <p>The Applicant confirms that any other upgrades to the PROW network generally may be delivered through the Community Benefit Fund, and therefore are not directly considered benefits of the Scheme. As such, these have not been considered in the assessment of likely significant effects, nor as mitigation or enhancement measures in the determination of residual effects in <b>ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]</b>.</p>
Q3.10.19	The Applicant	<p><b>Referencing of public footpath in Management Plan</b></p> <p>Paragraph 4.2.16 of the Outline Public Rights of Way and Permissive Paths Management Plan Revision B [REP3-066] appears to incorrectly refer to footpath Lavendon/FP1. Please update to Lavendon/FP5 if required.</p>	The Applicant has corrected this in <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [EX6/GH7.10_C]</b> .
Q3.10.20	The Applicant	<p><b>Permissive path missing from plan, Site F</b></p> <p>A permissive path is shown within Field FF33 along the south east boundary of Horn Wood on the Landscape and Ecology Mitigation Plan F Sheet 3 Revision C [REP3-054]. The path is not set out in the permissive paths section at 4.2 of the Outline Public Rights of Way and Permissive Paths Management Plan Revision B [REP3-066]. Please update the document as necessary.</p>	The Applicant has corrected this in <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [EX6/GH7.10_C]</b> .



ExQ	Respondent	Question	Applicant's Response
Q3.10.21	The Applicant	<b>Referencing of field number in Management Plan</b> Paragraph 4.2.9 of the Outline Public Rights of Way and Permissive Paths Management Plan Revision B [REP3-066] appears to incorrectly refer to field numbers EF33 and EF33. Please update to EF33 and EF34 if required.	The Applicant has corrected this in <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [EX6/GH7.10_C]</b> .
Q3.10.22	The Applicant	<b>Referencing of public bridleway in Management Plan</b> Paragraph 4.2.5 of the Outline Public Rights of Way and Permissive Paths Management Plan Revision B [REP3-066] appears to incorrectly refer to bridleway WN/CT/3. Please update to NN/CT/3 if necessary.	Bridleway CT3 falls within West Northamptonshire, and so carries the prefix 'WN'. As such, the Applicant confirms that the route identifier WN CT 3 is correct.
Q3.10.23	The Applicant	<b>Spelling of Waendel Walk</b> Please correct the spelling of Waendel Walk in paragraph 4.2.15 of the Outline Public Rights of Way and Permissive Paths Management Plan Revision B [REP3-066].	The Applicant has corrected this in <b>Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [EX6/GH7.10_C]</b> .
Q3.10.24	Mears Ashby Parish Council	North Northamptonshire Greenway Please confirm the location of the North Northamptonshire Greenway and how connection between the proposed development and the Greenway is proposed.	The Applicant notes that this question is not directed at the Applicant.



## 2.11 Water environment

ExQ	Respondent	Question	Applicant's Response
Q3.11.1	The Applicant	<p><b>Outline Construction Environmental Management Plan provisions</b></p> <p>The Outline Construction Environmental Management Plan (Revision A) [REP1-131] (OCEMP) sets out at Table 3.4 that construction buffers of 10 metres should be preserved adjacent to “all receptors”. Does this refer to water environment receptors only? If so, could this be specified both in the OCEMP and in any other relevant documents, such as paragraph 10.9.18 of Chapter 10: Hydrology, Flood Risk and Drainage (Revision A) [REP1-023], in the interests of clarity (as there are various different buffers applicable throughout the scheme)?</p>	<p>The reference in Table 3.4 of the <b>Outline Construction Environmental Management Plan (Revision C) [EX6/GH7.1_C]</b> to a 10 metre construction buffer adjacent to “all receptors” is intended, in the context of hydrology, flood risk and drainage, to apply to water environment receptors, including watercourses, ponds and other surface water features. The measure relates specifically to the control of sediment-laden runoff, pollution risk and protection of surface water during construction and is consistent with the approach set out in <b>ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage (Revision B) [REP5-015]</b>, including paragraph 10.9.18. It is not intended to operate as a generic buffer for all sensitive receptors across other technical disciplines, which are addressed separately within their respective assessment chapters and management measures.</p> <p>The <b>Outline Construction Environmental Management Plan (Revision C) [EX6/GH7.1_C]</b> and <b>Chapter 27 Commitments Register [EX6/GH6.2.27_A]</b> has been updated to clarify this.</p>
Q3.11.2	The Applicant	<p><b>UK Climate Projections</b></p> <p>Have the latest UK Climate Projections (UKCP18) been taken into account to ensure that appropriate mitigation or adaptation measures are identified?</p>	<p>Yes, the assessment of flood risk and drainage has applied the Environment Agency's current climate change allowances, which are derived from UKCP18 and represent the applicable national guidance for development planning. As set out in <b>ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP5-015]</b>, the hydraulic modelling and drainage design incorporate the relevant peak river flow and peak rainfall intensity uplifts for the 1% annual probability event, including climate change, in accordance with the Environment Agency's latest published guidance at the time of assessment.</p> <p>The Scheme has been designed so that it remains safe and does not increase flood risk elsewhere when accounting for these allowances.</p>
Q3.11.3	The Applicant	<p><b>Climate change</b></p> <p>Could there be features of the proposed development's design which are critical to its operation and could be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence? If so, could necessary action be taken to ensure the operation of the infrastructure over its estimated lifetime?</p>	<p>The Scheme has been assessed and designed using the Environment Agency's current climate change allowances for peak river flows and peak rainfall intensity, as applied within the flood risk and drainage assessment in <b>ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP5-015]</b> and the supporting Flood Risk Assessment and Drainage Strategy suite [REP5-021, REP5-023, APP-100, APP-101, APP-102, REP5-027, APP-104 to APP-106, REP5-029, REP5-031]. Those allowances provide the accepted basis for designing for climate change over the lifetime of development. On that basis, the Applicant does not identify Scheme elements that are both critical to operation and uniquely vulnerable to “more radical” climate change effects beyond the current allowances in a way that would undermine the assessment conclusions. The detailed drainage design and operational management controls secured through the DCO approval and maintenance framework provide the mechanism to incorporate appropriate resilience at detailed design stage and to maintain performance over the operational lifetime.</p>
Q3.11.4	The Applicant	<p><b>Maintenance of Sustainable Drainage Systems (SuDS)</b></p> <p>Would the most appropriate body be given responsibility for maintaining any SuDS, for example the landowner, relevant lead local flood authority or water and sewerage company?</p>	<p>The Sustainable Drainage Systems associated with the Scheme are not proposed for adoption by a water and sewerage company or the Lead Local Flood Authority. Responsibility for inspection, maintenance and ongoing management of drainage infrastructure, including any SuDS features serving the Scheme, would remain with the undertaker for the operational lifetime of the Scheme. This approach is consistent with the drainage strategy set out in <b>ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP5-015]</b> and the supporting Flood Risk Assessment and Drainage Strategy suite [REP5-021, REP5-023, APP-100, APP-101, APP-102, REP5-027, APP-104 to APP-106, REP5-029, REP5-031], with maintenance requirements as outlined within Table 3.4 of the <b>Outline Operational Environmental Management Plan [REP1-157]</b> and secured through the <b>Draft Development Consent Order [EX6/GH3.1_E]</b>.</p>
Q3.11.5	Stop Green Hill Solar	<p><b>Emergency access to proposed BESS</b></p> <p>The Schedule of Flooding Incidents on Station Road, Grendon indicates that these generally occurred at or near to White Mills Marina, off the northern section of Station Road. Alternative</p>	<p>The Applicant notes that this question is not directed at the Applicant.</p>



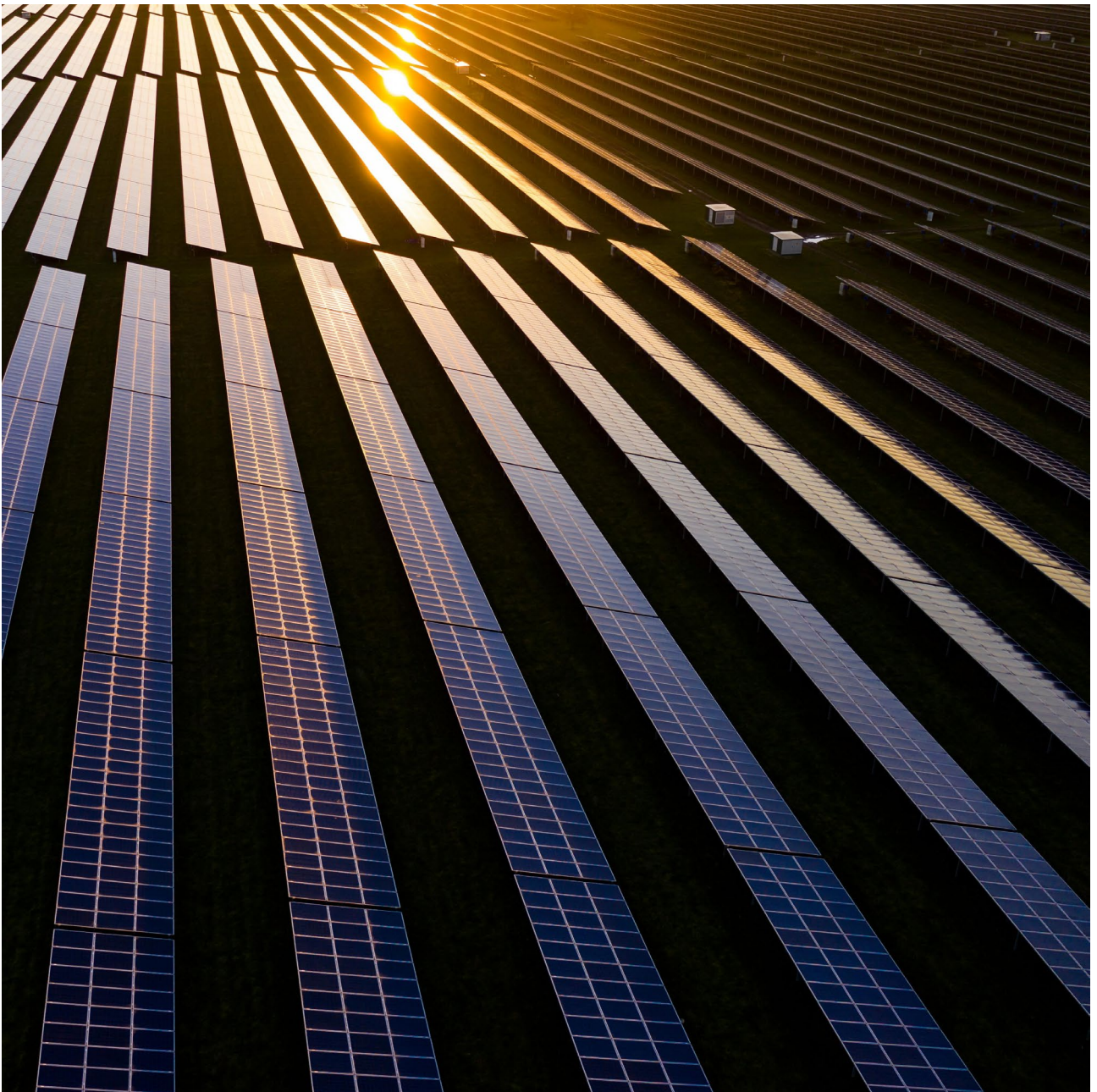
ExQ	Respondent	Question	Applicant's Response
		routes to the proposed BESS via Cogenhoe or Grendon would appear to be available. Could these be used by the emergency services when responding to an incident at the BESS if necessary?	



**Appendix A - MKCC Regulation 19 Response**



3535: Green Hill Solar Farm  
Representations to the Milton Keynes 2050 Emerging Local Plan



# Regulation 19 Representations to the Milton Keynes 2050 Emerging Local Plan

**Green Hill Solar Farm**

Green Hill Solar Farm Limited

February 2026

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## Issue Sheet

Document Prepared for: Green Hill Solar Farm Limited

### Regulation 19 Representations to the Milton Keynes 2050 Emerging Local Plan:

3535: Green Hill Solar Farm

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**Date:** January 2026

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**Date:** February 2026

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## 1 Introduction

1.1.1 Lanpro has prepared this response to the Milton Keynes 2050 Regulation 19 consultation on behalf of Green Hill Solar Farm Limited (GHSF) in relation to their land interests associated with the application for a Development Consent Order (DCO) for the construction, operation and maintenance and decommissioning of Green Hill Solar Farm ('the Scheme') with a total capacity exceeding 50 megawatts.

1.1.2 Specifically, this response provides comment on the following emerging policies:

- GS7 Wind and solar development spatial strategy;
- CEA6 Low and zero carbon energy provision; and
- CEA12 Conserving and enhancing landscape character/Special Landscape Areas.

### Structure of Document

1.1.3 This document comprises the following sections:

- Section 1 – Introduction: Provides an introduction to these representations, sets out the site context for the land with MKCC and provides a summary of the DCO process.
- Section 2 – Responses to the MK City Plan 2050 Regulation 19 Consultation: Emerging Local Plan Policies
- Section 3 – Conclusion: Summarises the responses to the emerging Local Plan policies.

### Background to Scheme

1.1.4 The Scheme comprises in total 1,441.4 hectares (ha) of land located within the administrative areas of North Northamptonshire Council, West Northamptonshire Council and Milton Keynes City Council. The Scheme comprises nine sites which are located to the north-east and south-east of Northampton and the west and south of Wellingborough. These sites are 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.

1.1.5 The Scheme consists of an electricity generating station with a capacity of approximately 500 MW comprising of ground mounted Solar Arrays and associated development, the latter encompassing: energy storage, grid connection infrastructure and any other infrastructure as well as works integral to the construction, operation, maintenance and decommissioning of the Scheme. The national grid connection Point of Connection will be at the Grendon 400kV National Grid Substation.

1.1.6 Green Hill G and part of the Cable Route Corridor (CRC) is located within the administrative boundary of Milton Keynes City Council (MKCC). A location plan of Green

Hill G and the area within MKCC's jurisdiction is at **Appendix 1** and a plan showing the field numbering for Green Hill G is at **Appendix 2**.

### **Green Hill Solar Farm Limited**

- 1.1.7 Green Hill Solar Farm Limited is part of Island Green Power Limited (IGP), which is a leading developer of utility-scale solar projects and battery storage systems, established in 2013.
- 1.1.8 IGP has successfully delivered nearly 40 projects worldwide that have generated more than 3 GW of energy capacity. This includes 21 solar and storage 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.
- 1.1.9 Their mission is to be the leading innovator in sustainable, clean energy development by pioneering solutions that facilitate the energy transition, conserve the planet's ecosystems and empower local communities.
- 1.1.10 Recently, IGP's Cottam and West Burton projects have received DCOs. The Cottam Solar Project was granted development consent by the Secretary of State on 5 September 2024. The West Burton Solar Project was granted development consent by the Secretary of State on 24 January 2025.

### **DCO Process**

- 1.1.11 As noted above, GHSF submitted a DCO application for the Scheme to the Secretary of State c/o to the Planning Inspectorate pursuant to section 14(1)(a) and 15(1) and 15(2) of the Planning Act 2008 on 23 May 2025 and this was accepted for examination on 19 June 2025. The Examination of the DCO application is ongoing and due to close on the 10 April 2026.
- 1.1.12 Throughout the pre-application stage, GHSF undertook three stages of community consultation. This included:
- a non-statutory consultation consisting of a soft launch of the project in January 2024, early introductory meetings with stakeholders and five early-engagement workshops between March and May 2024;
  - a statutory public consultation on more detailed proposals, including the Preliminary Environmental Information Report (PEIR), held for six weeks between 7 November and 19 December 2024; and
  - a supplementary consultation, referred to as a 'targeted consultation', for 28 days between 13 March and 10 April 2025.

- 1.1.13 In addition, there was ongoing consultation with MKCC, which comprised regular meetings, including with the Council's technical specialists which remain ongoing. MKCC, along with the other Local Authorities, has played a key role in informing the development of the Scheme, including the Environmental Statement. GHSF is developing a Statement of Common Ground with MKCC which is currently in draft and submitted into the Examination. This covers all matters relating to the Scheme including landscape, historic environment, ecology, hydrology and flood risk and transport and access.

#### **Site Context: Green Hill G and Cable Route Corridor**

- 1.1.14 Green Hill G lies entirely within the administrative boundary of Milton Keynes City Council and extends to approximately 170.9 ha. Green Hill G is located near the tripoint of North Northamptonshire, Milton Keynes and Bedford Borough Councils.
- 1.1.15 Green Hill G comprises open agricultural fields separated by hedgerows and scattered trees, with substantial woodland (Threshire Wood) to the north-east. The land slopes gently from north to south, ranging from approximately 70m to 105m above ordnance datum, with a shallow valley and small stream through the centre. Green Hill G has a main access from the A428.
- 1.1.16 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 located approximately 2.4km to the north and Olney 2.6km south-west. There are a few isolated properties, including Northey Farm to the north-west and a petrol station to the south-west, accessible via the Warrington Toll Bar Roundabout.
- 1.1.17 Bridleway MK|Lavendon|002 and Bridleway MK|Lavendon|014 form a continuous north-south route along most of the eastern boundary of Green Hill G. 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.
- 1.1.18 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.
- 1.1.19 The majority of Green Hill G is located in Flood Zone 1. However, a limited area to the southern boundary is identified as being in Flood Zone 3. The Environment Agency Historical Flood Map indicates that Green Hill G has not historically flooded and neither has the area immediately surrounding Green Hill G.
- 1.1.20 Lavendon Conservation Area is located approximately 575m to the south-east of Green Hill G. The nearest Listed Building is 33 Northampton Road, which is Grade II Listed, located approximately 600m to the south-east of Green Hill G. The Lavendon Castle: a Scheduled Monument is located approximately 300m to the east of Green Hill G.
- 1.1.21 The nearest SPA and Ramsar site (Upper Nene Valley Gravel Pits) is located approximately 6.2km north of Green Hill G. The nearest SSSI is Bozeat Meadow, located 2.9km north of

Green Hill G. There are two other SSSIs (Dungee Corner Meadow and Yardley Chase) located within 5km of Green Hill G.

- 1.1.22 Horn Wood is located 1.4km to the north of Green Hill G, which qualifies as a Local Wildlife Site.

### **Green Hill G – Proposed Layout**

- 1.1.23 **Appendix 2** outlines the illustrative layout for Green Hill G which has been submitted as part of the DCO application. The layout isn't fixed at this time; the detailed design will be approved via the discharge of requirements process with the relevant local planning authorities if the DCO is granted. The majority of fields within the site are proposed to include solar arrays. There will be a substation located to the south-west of field GF3, west of the overhead line which dissects Green Hill G. Access to Green Hill G will be taken from the A428.
- 1.1.24 Two permissive paths for pedestrians are proposed within the Site:
- One connecting existing PRoWs, footpath Lavendon|FP1 and bridleway Lavendon|BW2, running along the northern boundaries of fields GF1 and GF2; and
  - Another permissive path also connecting existing PRoWs, footpath Lavendon|FP1 and bridleway Lavendon|BW2, between fields GF6 and GF9.

### **Local Planning Policy**

- 1.1.25 The Site is within the designated Lavendon Neighbourhood Plan Area. The Lavendon Neighbourhood Plan was 'made' in March 2020 and forms part of the MKCC Development Plan, alongside MKCC's current Local Plan (Plan:MK 2016-2031), which was adopted in March 2019. GHSF has provided a full planning policy appraisal within the Planning Statement which forms part of the DCO submission to the Secretary of State ([GH7.15 A Planning Statement Revision A.pdf](#)).

## 2 Responses to the MK City Plan 2050 Regulation 19 Consultation: Emerging Local Plan Policies

2.1.1 This section sets out GHSF responses to the emerging Local Plan policies, which are considered relevant to the land subject to their DCO application, with a particular focus on Green Hill G and the CRC, which are located within the jurisdiction of Milton Keynes City Council.

### MK City Plan 2050

2.1.2 This Regulation 19 (pre-submission) consultation was published in November 2025. In the Council's ambitions, it states:

*"Tackling climate change and reducing carbon emissions is a key component of our ambition, which is a benefit of delivering places that are healthy and people friendly".*

2.1.3 This follows on from Milton Keynes Council declaring a climate emergency in 2019.

2.1.4 To support the emerging Local Plan, the Council prepared a Carbon and Climate Study, which set out policy recommendations on how the Council can achieve its ambition of being carbon negative by 2050.

2.1.5 The Carbon and Climate Study (2024) highlights the previous government's commitment to UK Net Zero by 2050. It refers to 'Powering up Britain', which set out the need to increase solar power generation fivefold by 2035 and confirms that ground-mounted solar is one of the cheapest forms of electricity generation and readily deployable at scale.

2.1.6 The following emerging policies below, which are considered relevant to the Scheme and in particular, Green Hill G, have been responded to.

### Emerging Policy GS7: Wind and Solar Development Spatial Strategy

2.1.7 Green Hill G is located within the preferred area for solar development, in line with Part A of the Policy. **Appendix 1** contains a plan showing the location of Green Hill G and extent of land which is within the preferred area for solar development. GHSF is supportive of this designation as it has also been considered as suitable for solar development through GHSF's own site selection and iterative design process.

2.1.8 It is noted that the area of search in policy GS7 has been based on an analysis of suitable land in rural areas, taking into account the following key considerations set out below (as set out in the supporting text to emerging policy GS7) which largely aligns with the Schemes approach to site selection and design considerations for the Site:

- Land in flood risk zone 3;
- Designated sites (e.g. SSSIs) that are important for the natural habitat they provide;
- Best and most versatile agricultural land;

- Ancient woodlands and all wooded areas;
- Priority habitats;
- Scheduled monuments;
- Ministry of Defence installations;
- Public green spaces;
- Urban/built-up areas; and
- Inland waters.

2.1.9 GHSF is pleased to note that MKCC supports solar development and GHSF supports planning policies seeking to identify suitable locations for solar development. This provides a clear policy led approach for future development which is beneficial to developers and the wider community. This policy provides an independent analysis which has identified that parts of Green Hill G is considered suitable for solar. This policy will contribute to the ambition of reducing carbon emissions and GHSF does not wish to raise any objection or comment on this policy.

#### **Emerging Policy CEA6: Low and Zero Carbon Energy Provision**

2.1.10 GHSF strongly supports the ‘low carbon and renewable energy and supporting infrastructure’ part of the policy as it supports a project, such as the Scheme, subject to the considerations as noted within the policy.

2.1.11 GHSF is pleased to note that MKCC recognises the intrinsic need for renewable energy production, including solar farms, to help meet the UK’s 2050 Net Zero target and MKCC’s ambition to reduce carbon emissions and considers the policy to be appropriately drafted to achieve these ambitions.

#### **Emerging Policy CEA12: Conserving and Enhancing Landscape Character/Special Landscape Areas**

2.1.12 GHSF objects to elements of this proposed policy relating to the Special Landscape Area designations as shown on the Policies Map with regard to the inclusion of areas of Green Hill G within the proposed Special Landscape Area (SLA).

## Conserving and Enhancing Landscape Character

**Part A - Development proposals must demonstrate that they conserve and, where possible, enhance the landscape character through sensitive design, mitigation and enhancement measures.**

- 2.1.13 GHSF does not raise any specific concern to this part of the policy and considers that this wording does not represent a policy constraint, rather a proportionate approach to the consideration of proposals in terms of landscape character.

**Part C - Development proposals affecting Special Landscape Areas will only be permitted where they:**

1. Conserve and, where possible, enhance the special character and key landscape qualities of the area;
2. Protect important views, features, landmarks and historic layout and setting of villages and hamlets;
3. Preserve the tranquillity of the area and the need to protect against intrusion from light pollution, noise and motion; and
4. Maintain and, where feasible, improve public access to the countryside.

- 2.1.14 GHSF is pleased that the Council recognises the importance of allocating land for renewable energy as it contributes towards Milton Keynes reducing its carbon emissions as well as helping to meet the UK's Net Zero carbon emissions. GHSF is objecting to the inclusion of parts of Green Hill G being located within the proposed extension of the Ouse Valley Special Landscape Area, as it considers that fields GF9 and GF13 do not contribute to the purposes of the SLA. It should be noted that the same land is also allocated as being within a preferred area for solar development under emerging policy GS7. GHSF is mindful that policy designations may overlap, but where this occurs the policies will typically be compatible with each other which is not considered to be the case in this situation.

- 2.1.15 The comments which have been submitted by MKCC within their Local Impact Report to the DCO examination state in paragraph 4.9 that *"It is considered that the development of these two parcels would be detrimental to the cohesiveness of the proposed SLA, which were proposed to be included to include the historic villages and surroundings within the north of the borough. Including these two parcels as part of the development would therefore be detrimental to the character of the SLA, given the industrialising nature of the development, in this location where it would be highly visible on the landscape, particularly in the area around Lavendon."*

- 2.1.16 This comment indicates that MKCC also consider the principles of the two policies are incompatible and there is conflict between the nature of development allowed for under

emerging policy GS7 and the proposed extension of the SLA. This incompatibility should be resolved to enable the policies in the emerging Local Plan to be consistently applied.

- 2.1.17 For the reasons set out in this response, with reference to the detailed environmental assessment of the impact of solar development in this area, it is clear that the areas of land within Green Hill G do not contribute towards the SLA or the purposes for the designation in policy CEA12, and it should therefore be removed from these areas.

### **Milton Keynes Review of Landscape Designations**

- 2.1.18 It is understood that part of the evidence base to support CEA12, the SLA has been determined following the review of landscape designations completed in May 2024.
- 2.1.19 The Ouse Valley special landscape character area was formerly designated as the Ouse Valley AAL. As part of the review of landscape designations, the report recommended extending the *'boundary north to encompass the historic villages on the valley sides (Stoke Goldington, Ravenstone and Lavendon), as well as Scheduled Monuments east of Lavendon'*.
- 2.1.20 The full evaluation for the Ouse Valley, refers to various assessment criteria including its natural and cultural heritage qualities, recreation value, landscape quality, local distinctiveness and functionality. All of these criteria have been considered by GHSF within their DCO application, set out below is a summary of our assessment against these criteria.

### **Cultural Heritage**

- 2.1.21 GHSF has considered fully the historic environment in and around the full Order Limits in its Environmental Statement. There are two designated heritage assets subject to detailed assessment due to the potential for indirect (i.e. setting) impacts as a result of solar development on Green Hill G. These were: the Scheduled Lavendon Castle (NHLE 1009542) and Grade II Listed Lavendon Castle Farmhouse (NHLE 1212559). Lavendon Castle (NHLE 1009542) does not share any direct relationship with Green Hill G and remains enclosed upon the discrete remains of the former castle. While the asset does share some limited historical relationship with Green Hill G in the broadest sense, as land within it would have once come under the jurisdiction of the Lavendon Castle, this relationship was removed by the demolition of the castle in the 16th century and by the construction of a homestead on this site in the 17th century. The Grade II Listed Lavendon Castle Farmhouse (NHLE 1212559) does not derive any significance from land within Green Hill G, nor does it share any specific historical or visual relationship with the fields within it. Therefore, it is concluded that the land within the Scheme does not contribute to the significance of these two heritage assets, they would maintain their historic and architectural interests, and there would be no impact to their significance from the Scheme. This position has not been challenged by Historic England.

- 2.1.22 Lavendon Conservation Area, along with the numerous designated assets located within it, were agreed by the Secretary of State to be scoped out of detailed assessment for the Scheme due to the lack of historical association or visual relationship with land within Green Hill G (please refer to the Scoping Report for the Scheme and the Scoping Opinion adopted by the Secretary of State, both available via the Planning Inspectorate website). The village is located in a low point in the landscape and is screened from the Scheme by existing vegetation and intervening built forms. Therefore, there will be no impact to the significance of any heritage assets within the conservation area, or to the character of the conservation area, from solar development within Green Hill G.
- 2.1.23 GHSF identified that the Milton Keynes Council Historic Landscape Character (MKHLC) maps all areas within Green Hill G as belonging to the 'Enclosure' Broad HLC Type. The majority of these areas are detailed as relating to either 18th century parliamentary enclosure or fields established in the 20th century. The exception is GF9, which is mapped as pre-18th century irregular enclosure. Post-medieval enclosure is a common field pattern type found across much of the rural landscape of the Milton Keynes borough, and it is therefore considered to have a low 'value' of sensitivity. Elements that characterise the historic landscape within the Order Limits of the Scheme (such as hedgerows) will be retained, and any temporary change in land use will be reversed following decommissioning and this is likely to be the case for many renewable energy developments. It is considered that the development on Green Hill G will not alter the ability to understand the historic landscape character within the Order Limits and the legibility of the historic landscape and field pattern will be maintained.
- 2.1.24 The heritage assets scoped in for assessment were agreed during consultation with Historic England and the Milton Keynes Conservation Officer between April 2024 and February 2025. Milton Keynes City Council state in paragraph 4.31 of its Local Impact Report in relation to the Scheme: "*The proposal would not have any impact upon the setting of nearby listed buildings or upon the Lavendon Conservation Area. A total of 10 Historical Landscape Character areas have been mapped within Site G*" (see Milton Keynes City Council Local Impact Report (LIR) [[Milton Keynes City Council Local Impact Report](#)]).

#### **Landscape quality (condition and intactness)**

- 2.1.25 Green Hill G and its immediate surroundings are located on large scale open farmland. The Site and the immediately surrounding landscape are large scale and away from the settlements such as Lavendon and Warrington, in arable use.
- 2.1.26 Green Hill G demonstrates characteristics that are found and replicated across the wider surrounding landscape including the predominance of large to medium to large scale arable fields, and outside of the large woodland blocks that contain the northern and eastern extents of the Site, there is an overall lack of woodland across the Site. Tree cover is currently provided by hedgerows trees along the field boundaries and along the watercourse.

- 2.1.27 There are a number of incongruous elements locally, including the high voltage transmission lines, the A509 and the A428 which detract from the aesthetic and perceptual value of this area.
- 2.1.28 From the elevated areas of the Site, long distance panoramic views are available south across the Ouse valley. The Three Shires Way and the Milton Keynes Boundary recreational routes pass through the Site.
- 2.1.29 There are no landscape designations across the Site or across the Local Area, nor any demonstrable physical attributes that would warrant elevating the value of this landscape. However, fields GF9 and GF13 fall within land identified by MKCC as being a Candidate Special Landscape Character Area – Ouse Valley. If adopted, this would be a new extension to the Ouse Valley SLA to cover the historic, scenic villages of Stoke Goldington, Ravenstone and Lavendon – the last of which is separated from Green Hill G by around 500m.

#### Local distinctiveness

- 2.1.30 The countryside surrounding Green Hill G comprises a good quality landscape that is typical of the surrounding Milton Keynes LCT1 Wooded Wolds, LCA1a Yardley Chase Wooded Wolds within the northern most half of the Site, and Milton Keynes LCT2 Undulating Valley Slopes, LCA2a Ouse Northern Undulating Valley Slopes.
- 2.1.31 However, there is evidence of some degradation and occasional detracting features within Green Hill G, including the high voltage transmission lines and the A428, both of which pass through the proposed SLA extension area.

#### Perceptual and scenic

- 2.1.32 Green Hill G is split between two landscape character areas, Milton Keynes LCT1 Wooded Wolds, LCA1a Yardley Chase Wooded Wolds within the northern most half of the Site, and Milton Keynes LCT2 Undulating Valley Slopes, LCA2a Ouse Northern Undulating Valley Slopes within the southern area, however the character across the Site is fairly consistent, with the greatest change associated with the change in elevation. The Site predominantly slopes south from 100m AOD along the northern boundary to 80m AOD towards the A428 at the southern boundary.
- 2.1.33 The A509 runs alongside the Sites western boundary with the Site mostly screened by roadside vegetation. The northern site boundary and part of the eastern boundary runs alongside Threshire Wood and The Oaks Wood, which provides enclosure to the site to the north and north east, and given their position on the higher landform form a wooded horizon in this direction.
- 2.1.34 A series of high voltage transmission lines cross directly across the Site running through fields GF13, GF12, GF11 and GF3 (please refer to **Appendix 2** for field numbering).

- 2.1.35 The Three Shires Way and the Milton Keynes Boundary recreational routes pass through the Site. The Wooded Wolds LCT is a typical rural landscape and is generally in good condition, with intact hedgerow field boundaries and a strong historic field pattern. There has been some modern amalgamation of fields, and some use of post and wire fencing for horse grazing. Semi-natural habitats are in good condition, with a mixed age structure, although woodlands are scattered.
- 2.1.36 Road noise is prevalent, particularly given the proximity of the adjacent A roads, with these and the high voltage transmission line forming a visual intrusion and detracting from the character of the immediate area surrounding the Site.
- 2.1.37 From the more elevated locations of the Site, including from the PRow, there are long panoramic views to the south over the Ouse valley. Land is predominately under arable cultivation, with considerable 20th century field amalgamation, as a result of modern farming techniques, creating large scale fields, such as those within the Site. There are smaller areas of pasture near settlements or on the edges of woodland. Field boundaries are generally low, clipped hedgerows with occasional mature hedgerow trees. Hedgerows along the minor roads are in better condition than field hedgerows.
- 2.1.38 The northern area of the Site is identified as being within the 1a Yardley Chase Wooded Wolds. This is a narrow strip of land on the northern edge of the borough. It forms the foreground to the wooded Yardley Chase and Salcey Forest to the north (within Northamptonshire), and is part of the wooded plateau, with topography ranging from 85m to 110m AOD.
- 2.1.39 The majority of the land use is arable with smaller areas of pasture near farmsteads. Hedgerows are in generally good condition, and are often species-rich. This is a rural, and at times remote landscape, with dark night skies in the north, especially within the woodlands.
- 2.1.40 Modern influences include an electricity pylon route in the east, modern garage at Warrington House, which is out of place in the rural landscape and views to Milton Keynes city to the south. Road noise from the M1 and other major roads reduce the levels of tranquillity throughout the area, despite its rural character. The southern area of the Site is located within the LCA2a Ouse Northern Undulating Valley Slopes which comprises the valley landscapes along the course of the River Ouse and the River Tove. This is an open and gently sloping landscape, predominantly in arable use. It is generally a quiet and picturesque rural landscape with limited impact from modern development.
- 2.1.41 A mixed field pattern dominated by large-scale arable fields with unclipped hedges. Smaller pasture fields are common on lower slopes with those near settlements often used for horse grazing. Contrary to the character of the Site, the Undulating Valley Slopes LCT is identified as having a remote character with few modern detractors.
- 2.1.42 The containment provided by the A428 separates the Site from the surrounding Undulating Valley Slopes LCT that is much more defined across the landscape to the south. The character of the southern areas of the Site are considered more in keeping with the descriptions of the 1a Yardley Chase Wooded Wolds LCA.

### Functional

- 2.1.43 It is acknowledged that Green Hill G is located adjacent to Threshires Wood but any Scheme will have the ability to incorporate mitigation measures such as offsets, buffers and standard tree protection measures during construction, operation and decommissioning to maintain the functionality.

### Recreation Value

- 2.1.44 The Milton Keynes Boundary Walk has been considered within the Environmental Statement Chapter 17: Socio-Economics, Tourism and Recreation of the Scheme. The assessment outlines that during construction, a temporary significant effect will likely occur associated with direct impacts from onsite infrastructure and cabling construction works. Embedded mitigation to limit impacts on these features will be secured in the accompanying management plans. This will include provision of suitable temporary diversions and notices of closures, and the provision of temporary management measures at HGV crossing points, such as signage and banksmen, to mitigate impacts upon PRow users.
- 2.1.45 During operation, through the Scheme's design and embedded mitigation, the routing and access of all existing PRowS and permissive recreation routes within the Order Limits throughout the operational lifetime of the Scheme is preserved, except during times of infrastructure replacement. Furthermore, embedded landscape mitigation will establish and mature during the first 15 years of the Scheme's operational lifetime, providing long-term visual mitigation for PRow users. There is sufficient ability and control through the planning system that could require any Scheme to consider, assess and mitigate the recreational value of a piece of land without additional policy constraint.
- 2.1.46 In summary, it is considered by GHSF that Green Hill G does not meet the purposes of the SLA and the extension should not be extended into fields GF9 and GF13.

**Part D - Development proposals must include appropriate measures to mitigate landscape and visual impacts. Landscape and Visual Impact Assessments shall consider the Milton Keynes Landscape Character Assessment, the Statements of Significance for each of the Special Landscape Areas, and any other relevant landscape and visual assessments or studies.**

- 2.1.47 GHSF does not raise any specific concern to this part of the policy and considers that this wording does not represent a policy constraint, rather a proportionate approach to the consideration of proposals in terms of appropriate mitigation measures.

### 3 Conclusion

#### Background to Scheme

- 3.1.1 These representations have been prepared by GHSF in relation to their land interests associated with the application for a Development Consent Order for the construction, operation and maintenance and decommissioning of Green Hill Solar Farm.
- 3.1.2 The Scheme in total extends to approximately 1,441 hectares, located within the administrative areas of North Northamptonshire, West Northamptonshire and Milton Keynes.
- 3.1.3 Part of Green Hill G and the Cable Route Corridor is located within the administrative boundary of Milton Keynes City Council. Green Hill G extends to approximately to 170.9 hectares and is located near the tripoint of North Northamptonshire, Milton Keynes and Bedford Borough Councils.
- 3.1.4 The majority of fields within the Site are proposed to include solar arrays.

#### Response to Emerging Policies and Proposed Actions

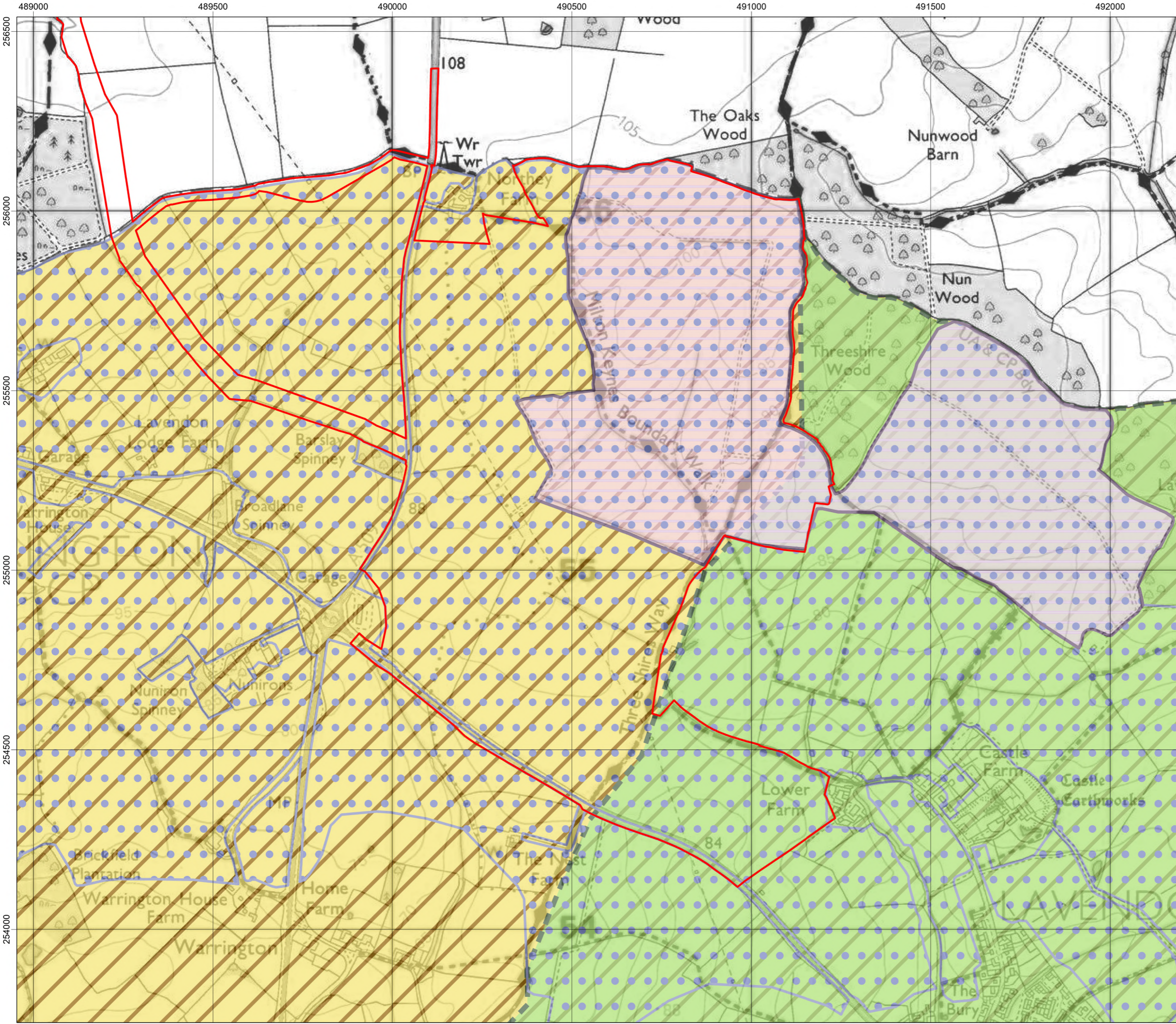
- 3.1.5 Green Hill Solar Farm Limited is pleased that Green Hill G is within the preferred area for solar development, in line with emerging Policy GS7 and therefore, the principle of development for the scheme is considered acceptable.
- 3.1.6 Green Hill Solar Farm Limited is satisfied to note that that Milton Keynes recognises the importance of low and zero carbon energy production, including solar farms to help meet the UK's wider 2050 net zero carbon emissions through emerging Policy CEA6.
- 3.1.7 However, GHSF wishes to raise objection to elements of emerging policy in relation to the Special Landscape Area as shown on the Policies Map, which is set out in emerging Policy CEA12.
- 3.1.8 Green Hill Solar Limited specifically objects to Part C of emerging policy CEA12 as it considers that Green Hill G should not be included in the proposed extension of the SLA as it does not contribute to the purposes of the SLA. Green Hill G is also proposed to be designated under emerging policy GS7 as a preferred area for both solar and wind development. Whilst GHSF is mindful that policy designations may overlap, where this occurs the policies will typically be compatible with each other. However, the Council has highlighted that these policies are in conflict during the DCO examination, stating that the proposed solar development at Green Hill G would be detrimental to the character of the Special Landscape Area, while, at the same time, designating that area as a preferred area of search for solar within its emerging Local Plan.

- 3.1.9 It is clear from this conclusion that in this instance the two policies are not compatible with each other and there is an inherent conflict.
- 3.1.10 It is GHSF position that the extension of the SLA should not extend into Green Hill and this designation should be removed from Green Hill G as the land does not meet the purposes of the SLA and is a policy conflict to the Council in achieving its ambition of reducing carbon emissions.
- 3.1.11 Notwithstanding the assessment evidence demonstrating that the land within Green Hill G does not contribute to the Ouse Valley SLA, and does not share the attributes of other land within the proposed extension, GHSF believes that its assessment of the Scheme and the mitigation and landscaping proposals demonstrate clearly that solar development is not inherently incompatible with an SLA designation. In the event policy CEA12 is retained in areas of Green Hill G, and in other areas that are also within policy GS7, it is suggested that the Local Plan make clear this inherent *compatibility* between solar development and the SLA in the overlapping areas. This would provide guidance as to the landscaping and other measures a project must take to ensure this compatibility, leading to certainty for developers and clarity over how the emerging Local Plan is to be applied.

### Conclusion






- 3.1.12 In conclusion, part of the Green Hill DCO (Green Hill G) is located within Milton Keynes area of jurisdiction.
- 3.1.13 Green Hill Solar Farm Ltd is pleased that there is a focus on Milton Keynes promoting zero carbon energy generation and is satisfied that Green Hill G is located within preferred area of search for solar development.
- 3.1.14 There is a conflict between the designation of the preferred area for solar development and the proposed extension of the Special Landscape Area, where these overlap. Green Hill Solar Farm Ltd objects to this extension overlapping with the preferred area for solar development within Green Hill G. It is not considered that the land is of a significant landscape value to warrant this protection and should be excluded from any proposed extension of the SLA. Alternatively, the policies should be revised to provide clarity on how solar and wind development must be designed so as to be compatible with the overlapping SLA allocation.

**Appendix 1      Location of Green Hill G within Solar Farm Area of Search**



Title: Figure 8.14 Green Hill G: Milton Keynes City Plan 2050 Emerging Allocation

Document: Volume 1 Landscape and Visual Environmental Statement (ES)

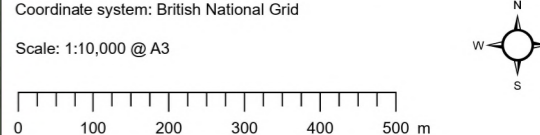
- Legend:
-  Order Limits
  - Milton Keynes City Plan 2050**
  -  Housing Viability Area 1
  -  Special Landscape Area
  -  Solar Farm Area of Search
  -  Wind Turbine Area of Search

Data: Milton Keynes City Council, 2025; Lanpro, 2025; IGP, 2025  
 Base map: © Crown copyright and database rights 2025, Ordnance Survey 0100031673  
 Ordnance Survey 0100031673



APFP Regulation: 5(2)(a)  
 Application Doc No.: EN010170/APP/GH6.4.8.14  
 Drawing no.: P3535\_LPR\_ZZ\_XX\_M2\_Z\_OPN\_0338

Coordinate system: British National Grid  
 Scale: 1:10,000 @ A3




**Appendix 2            Green Hill G Field Numbering**

489000

490000

491000

492000



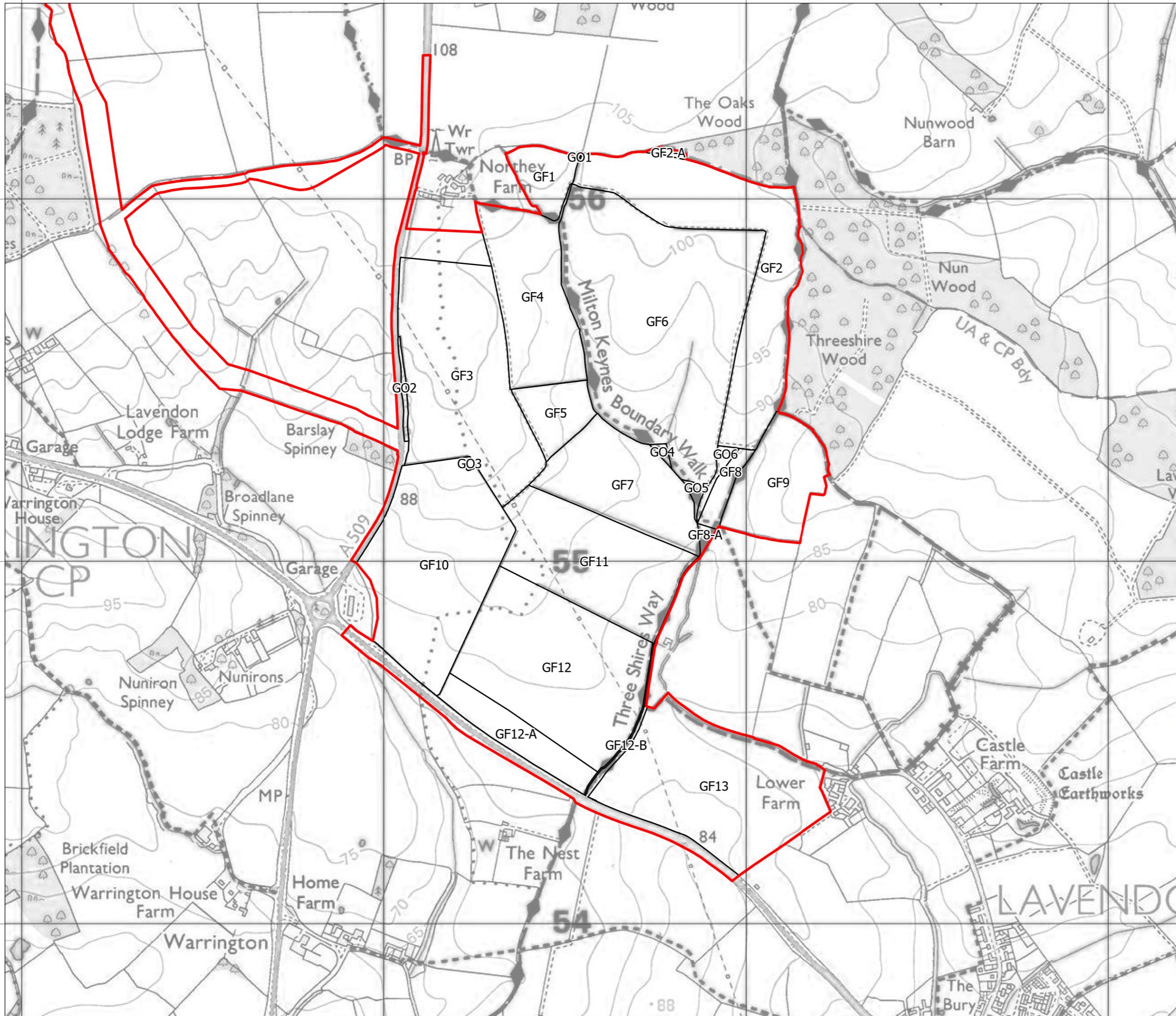
Title: Figure 3.1.5 Field Numbering Plan  
Green Hill G

Document: Volume 2  
Development Site  
Environmental Statement (ES)

Legend:

Order Limits

Field Boundaries



Data: Lanpro, IGP, 2025  
Base map: © Crown copyright and database rights 2025, Ordnance Survey 0100031673

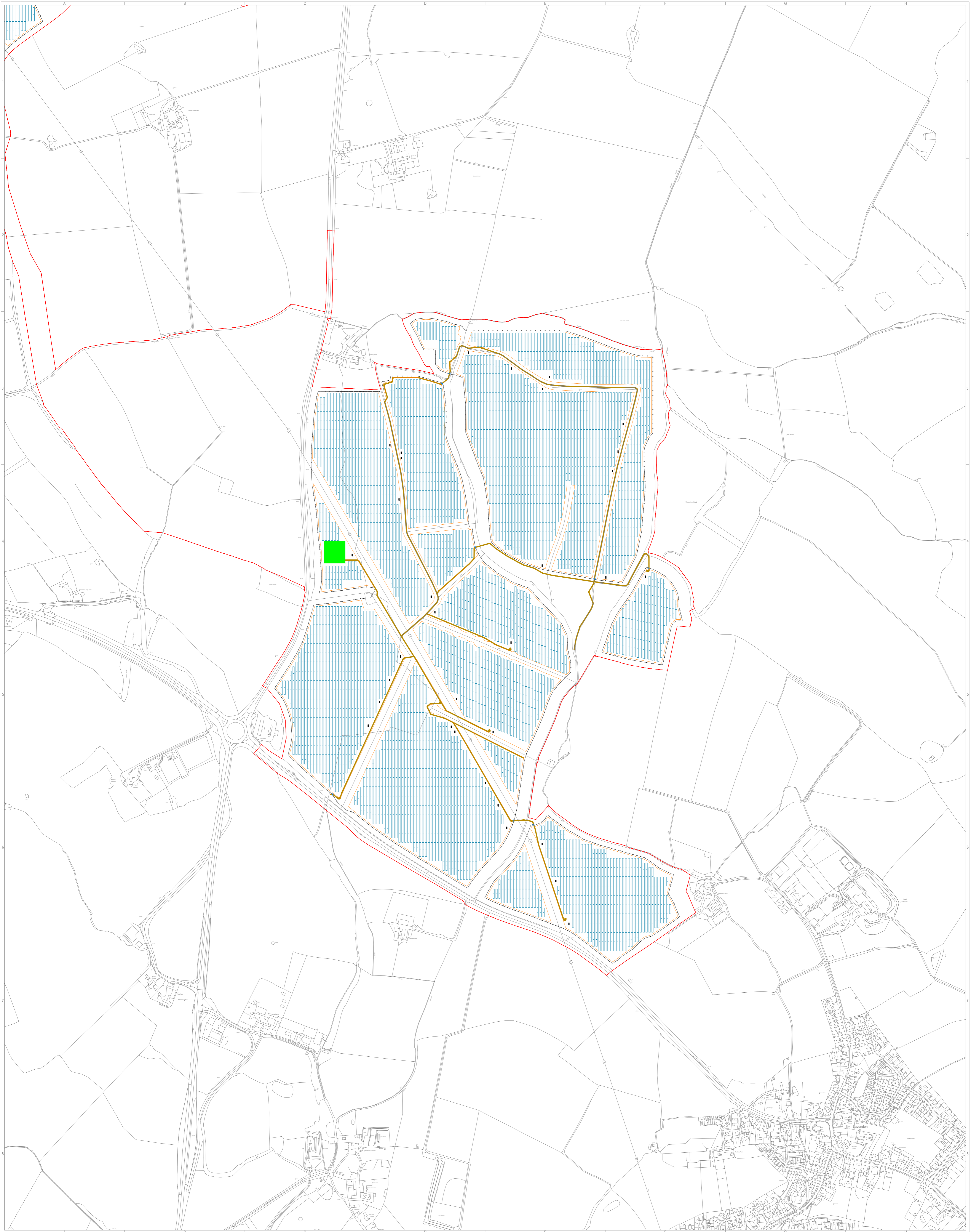


APFP Regulation: 5(2)(a)  
Application Doc No.: EN010170/APP/GH6.4.3.1  
Drawing no.: P3535\_LPR\_ZZ\_XX\_DR\_Z\_DEV\_0113

Coordinate system: British National Grid  
Scale: 1:10,000 @ A3

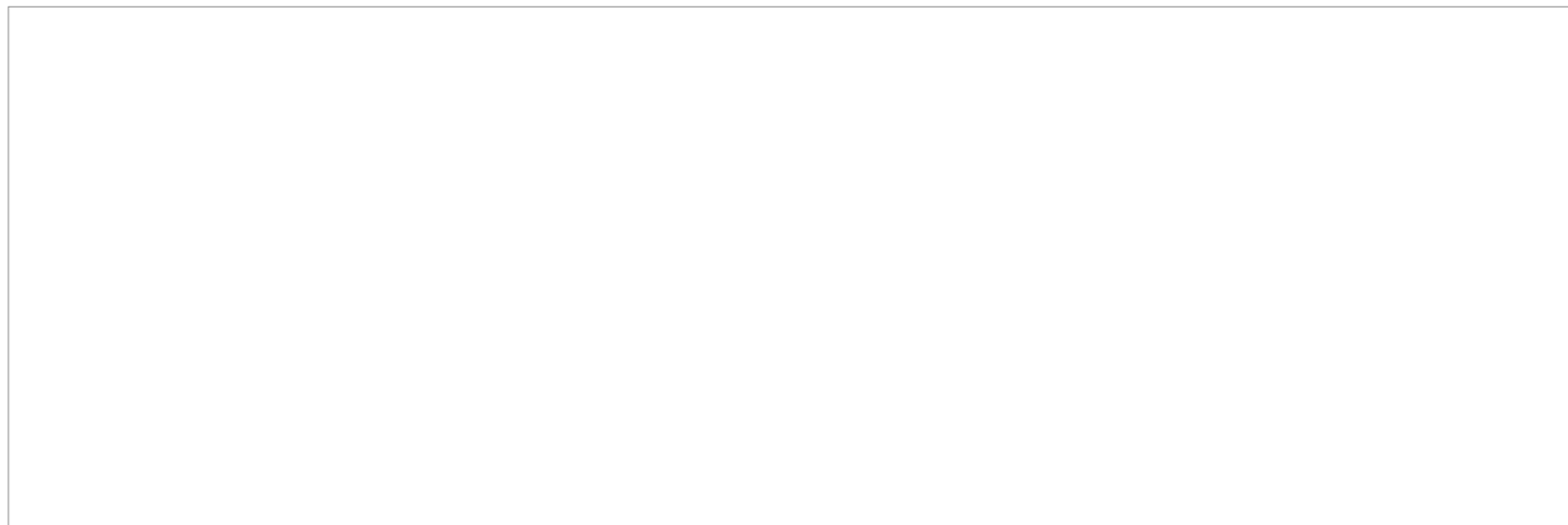


**Appendix 3          Indicative Layout**



General Legend

	Order Limits
	Developable Area
	Fence
	Mounting Structure
	Conversion Unit
	Substation Area
	Maintenance Track
	Gate



Project:	Green Hill Solar Farm
Project Location:	Green Hill G
Project Ownership:	Green Hill Solar Farm Ltd
Document Title:	GH6.4.4.8_ES Figure 4.8_Illustrative Layout Plan Green Hill G (APPP Regulation 5(2)(a)) (EN010170/APP/IGH6.4.4.8)

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