Green Hill Solar Farm

EN010170

Applicant's Further Response to Deadline 4 Submissions

Prepared by: Lanpro Services

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The Infrastructure Planning (Examination Procedure) Rules 2010

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Contents

Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 6

The Applicant's Further Responses to Deadline 4 Submissions

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides Green Hill Solar Farm Limited (the 'Applicant's') response to further Written Representations (WRs) submitted by Interested Parties to the Planning Inspectorate (PINS) by 26 February 2026, relating to Examination Deadline 4 for the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').

1.1.2 A total of 7 WRs and other documents were submitted to the Examining Authority by Interested Parties in response to the Scheme. WRs were published on 02 March 2026 to the Planning Inspectorate's website (PINS reference: EN010170).

1.2 Structure of the Report

1.2.1 This document provides a response from the Applicant to the matters raised in those WRs and other documents received.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Green Hill Solar Farm Examination Library.

1.2.3 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 5 to the Planning Inspectorate.

Table 1.1: List of Acronyms for Submission Documents

Acronym	Document Name
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
PRA	Preliminary (Geo-Environmental) Risk Assessment
OCEMP	Outline Construction Environmental Management Plan
OOEMP	Outline Operational Environmental Management Plan
ODS	Outline Decommissioning Statement
OLEMP	Outline Landscape and Ecological Management Plan
OEPMS	Outline Ecological Protection and Mitigation Strategy
OSMP	Outline Soil Management Plan
OBSSMP	Outline Battery Storage Safety Management Plan
OSSCEP	Outline Skills Supply Chain and Employment Plan
OCTMP	Outline Construction Traffic Management Plan

Acronym	Document Name
OPROWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
CDPP	Concept Design Parameters and Principles
EqIA	Equality Impact Assessment
HRA	Habitat Regulations Assessment
OOTMP	Outline Operational Traffic Management Plan

2 Applicant's Further Response to Deadline 4 Submissions

2.1 Stop Green Hill Solar

Table 2.1: [REP5-121] & [REP5-119]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
Applicant's Response to [REP5-121]				
SGHS-001	Cultural Heritage	Acceptability of mitigation planting on historic assets	Response from Historic England [REP4-040] We would like to comment that Historic England appear to suggest that in some instances there would not be an unacceptable level of harm to certain of the assets referred to. We assume that this assessment is based on assumptions regarding screen planting and would request that the examiners review SGHS earlier report.	All assessment work has been undertaken in consultation with Historic England. (See **ES Appendix 12.8 Consultation Tables [APP-148]**). The Applicant has addressed Historic England's advice, provided during both pre-application and examination, regarding designated heritage assets, through updates to the submitted project documentation. In the Statement of Common Ground with Historic England which is submitted at Deadline 6 **[EX6/GH8.3.4_A]** the approach to safeguarding designated heritage assets has been agreed and Historic England consider setting issues to have been appropriately mitigated for designated assets.
SGHS-002	Landscape and Visual Impacts	Visual Effects	Applicant comments on responses to ExA Second Written Questions [REP4-019] Q2.13.3 – Mitigation Planting SGHS wish to acknowledge and emphasise the applicant's response which states that "there would be an immediate change to the character	The Applicant maintains that the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure" We contend that the arguments then advanced by the applicant, to the effect that the dispersed nature of the sites, the "reversible" nature of the scheme, the existing vegetation, and the mitigation effects would in no way bring about acceptable resolutions to the changed landscape character. Much of the mitigation planting involves hedgerows which, we argue elsewhere, would not reach the proposed height (4.5 metres) and would obscure existing viewpoints and be out of character with all other hedgerows which are maintained by cutting back to around 2 metres or less each year.	*infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." NPS EN-1 recognises at para 5.10.13 that "*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*." The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. Schemes of this nature are essentially 'overlaid' across the existing landscape and reversable: For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, , are 'overlaid' on the landscape. This allows the important landscape features such as

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. The strong framework of existing vegetation means that this would provide the structure for the Scheme to be set comfortably and not become intrusive within the landscape. The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. Year 15 would bring forward the benefits of the new planting in reducing the adverse effects. Please refer to the LVIA specifically Table 8.10 which sets out the Planting Typologies utilised within the Landscape and Ecology Mitigation Plans and Table 8.11 of the LVIA. In following the mitigation hierarchy, the Scheme would deliver significant areas of mitigation that would enhance the natural environment by providing net gains for biodiversity. This would deliver additional enhancement and connections to wider ecological networks as well as contributing to the enhancement of the quality of the

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				landscape going well beyond biodiversity net gain. The Scheme has been designed with a mind to the 'Legacy Landscape'. This is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. At decommissioning, agricultural fields would be returned back to agriculture. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals

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				resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. The LVIA **[APP-045]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The LVIA **[APP-045]** acknowledges a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure. Adverse effects remain through to the decommissioning phase, although reduced and no longer Significant

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				as a result of the establishment of the mitigation planting.
SGHS-003	Landscape and Visual Impacts	Visual Effects and Cumulative impacts	*Applicant comments on responses to ExA Second Written Questions [REP4-019]* *Q2.13.4 – Cumulative Effects* SGHS wish to comment that the basic design of the scheme, with site selection being driven by inappropriate criteria rather than a preferential search for brownfield or non-BMV land – has resulted in cumulative impacts that would not otherwise have required any consideration. Applicant responses to this issue are not satisfactory. We refer to the response cited above regarding mitigation planting and its impact on the character of the landscape. We also wish to express our support for the comments and observations put forward by CPRE in GH8.1.28 (Rep 4-020) where the applicant is identified as seeking support for treating the project either as a single entity or as multiple individual sites according to the case they wish to present.	As set out in Environmental Statement **Chapter 5: Alternatives and Design Evolution [APP-042]** and ES **Appendix 5.1 Site Selection Assessment of the Environmental Statement Revision A [REP1-037]** there is no standard methodology for the selection of sites for solar energy generating stations. The selection of the Scheme's proposed location has followed a five-stage site selection process, which has sought to identify sites that meet the legislative and policy requirements, whilst recognising the need for the Scheme to be commercially viable. The **Farming Report [APP-571]** demonstrates that within the wider area the land is almost all in either the 20-60% BMV or >60% BMV category. It is notable that much of Northamptonshire, particularly to the north and southwest of Grendon, consists predominantly of higher grade land, with a mixture of Grade 2 and Grade 3 often with both Grade 2 and Grade 3 land in individual fields. Environmental Statement **Figure 5.4 [APP-225]** shows the brownfield land over 1 ha which has been identified using the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				brownfield register for the local planning authorities within the 15km area of search. The brownfield sites were considered to be too small and do not meet the minimum individual site size threshold of 40 ha or an area of approximately 1,100 ha sought for a network of sites in proximity to Grendon Point of Connection. Although the Scheme comprises a series of independent areas of land or Sites, they are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road infrastructure aiding integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large Site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape

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				also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern. Due to the dispersed nature of the Sites within the Scheme, an assessment of the landscape and visual effects of Green Hill Sites A to G and the Green Hill BESS, taken together, has been undertaken to determine the effects of the Scheme as a whole. The cumulative effects of each of the Sites are assessed and combined to achieve a set of effects of the Scheme to reach an overall conclusion on where likely significant effects might occur as a result of the Scheme. This is set out in Table 8.17 of **ES Chapter 8 Landscape and Visual Impact Assessment [APP-045].** **Chapter 8: Landscape and Visual Impact Assessment [APP-045]** has identified that the development of the Scheme would result in Significant Adverse Effects to Landscape Character within the 1km Study Area. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15).

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SGHS-004	Air Quality	BESS: Toxic Fumes	*Applicant responses to Written Representations at Deadline 3 [REP4-020]* *CPRE-036 – Air Quality* SGHS notes that the applicant states that they have "thoroughly addressed all requisite BESS failure safety issues" in OBSSMP (Rep1-143) and APP-167. SGHS does not accept that safety has been thoroughly addressed and proposes to submit further evidence relating to safety factors prior to Deadline 5.	Please refer to Appendix A of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP3-075].** In accordance with Requirement 6 in Schedule 2 to the **Draft DCO Revision E [EX6/GH3.1_E]**, the relevant planning authority must consult with Northamptonshire Fire and Rescue Service and the Environment Agency before approving the detailed **Outline Battery Storage Safety Management Plan (OBSSMP) [REP5-075]**, ensuring that any developments as to best practice will be taken into consideration. The OBSSMP has been drafted in consultation with Northamptonshire Fire and Rescue Service. The Statement of Common Ground with **Northamptonshire Fire and Rescue Service [REP2-063]** is finalised with all matters agreed. The **BESS Fire Emissions Modelling [APP-167]** scope also included all requested emission gases and fire particulates requested by the UK Health & Security Agency (UKHSA) in recent DCO planning hearings. The BESS Fire Emissions Modelling of the selected BESS system commissioned at

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				the detailed design stage will be conducted at approved third-party or government approved test laboratories. These facilities utilise large scale smoke hoods (cone calorimeters) capable to capture every type of battery gas & particle emitted during the thermal runaway process at module, battery rack or complete BESS enclosure level. This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO2), Hydrogen (H2), Sulphur Dioxide (SO2), Nitrogen Oxides (NOx), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), PAHs, etc. The equipment also integrates comprehensive particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. This means that heavy metal particulate emissions can be quantified and included in emission modelling if the selected battery system emits significant levels during fire testing. Section 5.5.9 of the **Outline Battery Storage Safety Management Plan Revision B (OBSSMP) [REP5-075]**

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				stipulates: *The BESS Fire Emissions Modelling concludes that there are no significant impacts on sensitive receptors. Nonetheless, at the detailed design stage the Applicant will commission a BESS system and site specific Plume Analysis study to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The Emergency Response Plan (ERP) produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.* *Section 6.1.1 of the OBSSMP* stipulates*: The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence*

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				modelling to provide a comprehensive site operations and emergency response safety audit.
SGHS-005	Agriculture and Soils	The utilisation of fields with solar panels for sheep grazing.	*Applicant responses to Written Representations at Deadline 3 [REP4-020]* *CPRE-044 – Continuing Agricultural Use* SGHS notes the continued absence of agreement about the use of formerly arable land for sheep grazing. SGHS is grateful for the examples of sheep grazing at solar sites which the Applicant's farming consultant has provided. Could the Applicant please confirm whether these sites are still being grazed on an ongoing basis? Also, could the Applicant please provide the areas (in hectares) of these sites, and the schemes' generating capacity (in megawatts (MW)).	**Outline Landscape and Ecological Management Plan Revision E [EX6/GH7.4_E]** sets out that sheep grazing could commence annually after Year 1 when the meadow planting has established. As this is approximately 4 years into the future, grazing licences have not been agreed however, several of the Site landowners have expressed an interest in grazing sheep. In order to ensure the worst case has been assessed, the Environmental Statement assumes that mowing will be utilised and the option of grazing is noted as one of the agricultural activities that may continue but other activities are also suggested such as vegetation management. Therefore no reliance is put on sheep grazing. As the examples provided are not within the Applicant's control, it is not possible to confirm the current grazing status or the constructed capacity of the Scheme. The Applicant will set out the approach to grazing in the detail Landscape and Ecological Management Plan which is secured in Schedule 2, Requirement 7 of the **draft DCO Revision E [EX6/GH3.1_E]**.

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SGHS-006	Site Selection	The appropriateness of the site selection methodology and associated elements.	*Applicant responses to Stop Greenhill Solar [REP4-021]* *ExQ – SGHS-001; SGHS-002; SGHS-003; SGHS-004; SGHS-005; SGHS-020* SGHS notes the applicant's response and reiterates that the selection of sites has not been conducted on an appropriate basis in line with the government policy, as referred to in previous documentation and submissions. The consequence of the inappropriate selection of sites and the late addition of two sites (Site G and Site A2) has resulted in a distended scattering of sites which has failed to identify and include non-BMV land which could have been utilised. This has dramatically increased the cable route requirements, has exacerbated the need to block public footpaths and led to increased requirements for hedging and tree planting which would obscure existing viewpoints. The Farming Report (APP-571), which references BMV land, is quoted by the applicant and is significant: "It was not considered proportionate to consider in detail every piece of unconstrained Grade 3 agricultural within the 20km search area identified through the site selection process due to the amount of land involved and the vast quantity of BMV land within the 20km search radius". The statement indicates that the search	The Applicant considers that the site selection has been undertaken appropriately as previously outlined in the Applicant responses to Stop Green Hill Solar **[REP4-021]**. In response to the 'scattering of sites', it is acknowledged that the Scheme comprises a series of independent areas of land or Sites set within an extensive agricultural landscape. However, with large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so far apart that the Scheme will not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach compared to having a single large site, as it

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			was not done transparently or thoroughly but merely based on the least possible effort which arose from the responses of willing landowners. The site selection search should, at the very least, be undertaken again to include non-BMV land for which compulsory acquisition options could be used. Further, the applicant states (in response to SGHS-006) that the search criteria for 500MW capacity involved "a total size of approximately 1,000 hectares (excluding cable route"). SGHS notes that site selection has resulted in an area that significantly exceeds this figure and so requires increased cable routing.	allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern. This 'network of sites' approach demonstrates good design by allowing for a fine-tuning approach to the Scheme design to reduce impacts with regard to use of BMV land, heritage assets and archaeology, areas at risk of flooding, suitable access arrangements, and providing ample opportunity to utilise existing, and provide enhanced landscaping and vegetation where possible. This demonstrates how the Scheme is sensitive and responsive to place. During the Scheme's operational lifetime, the routing of all existing PRoWs is preserved, with additional commitment to providing an enhanced user experience through additional hedgerow screening, planting of tussocky grassland to enhance ecology and biodiversity next to PRoWs and providing upgraded permissive links to increase PRoW network connectivity. These measures are secured through the **OLEMP Revision E [EX6/GH7.4_E]** which

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				itself is secured by Requirement 7 in Schedule 2 to the **Draft DCO Revision E [EX6/GH3.1_E]**. In regard to the use of BMV land, as outlined in response SGHS-004 of the **Applicants Responses to Stop Green Hill Solar [REP4-021]**. The approach to site selection is considered sufficient as suggested above the surrounding area consists largely of high grade land and therefore the use of BMV land has been justified and any losses minimised where reasonably possible. As noted in the response to SGHS-004, Para 5.6.44 of **ES Chapter 5 Alternatives and Design Evolution [APP-042]** states that '*It was not considered proportionate to consider in detail every piece of unconstrained Grade 3 agricultural land within the 20km search area identified through the site selection process due to the amount of land involved and the vast quantity of BMV land within the 20km search radius*'. Paragraph 5.6.45 of **ES Chapter 5 Alternatives and Design Evolution [APP-042]** should be read in conjunction with paragraph 5.6.44, and it states due to the reasons set in paragraph 5.6.44, the focus was on large scale landholdings not that the leading

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				predominant factor in site selection was to have large scale landholdings. The site selection assessment sought to avoid the use of Grades 1, 2 and 3 and so at stage 2, the assessment excluded Grades 1, 2 and 3 to identify suitable sites within areas of Grade 4, 5 or unclassified land that was not affected by the other identified planning and environmental constraints. Best and most versatile agricultural land has been considered under land use for the assessment indicators and criteria (Annex D and E) which fed into the Potential Development Area Proformas (Annex F) where BMV was considered under land use also. In regard to the final point raised in regard to the Applicants response to SGHS-006 the quote provided regarding the search criteria for 500MW capacity involved "a total size of approximately 1,000 hectares (excluding cable route") should be read in conjunction with the following as '*The Applicant sought to find a total site which is around 10% larger than is needed for the grid connection offer. Based on Island Green Power's experience of developing utility scale solar projects, a larger site size provides flexibility for the accommodation of additional mitigation measures and other*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				constraints that may become known through the design development process' as outlined in ES Chapter 5. The total hectarage for the Sites (excluding cable route corridor) is approximately 1,200 hectares; this enables sufficient land for 500MW capacity as well as provision of various mitigation and enhancement measures.
SGHS-007	Landscape and Visual Impacts	Methodological concerns	Applicant responses to Stop Greenhill Solar [REP4-021] ExQ – SGHS-011 In SGHS's landscape expert's opinion, the Applicant's responses do not satisfactorily address matters raised in the Landscape and Related Matters Statement [REP1-195] and associated documents, and in subsequent comments / responses. The fact that there is agreement between the Applicant's and Councils' landscape experts about the LVIA method and approach does not alter the landscape expert's position on those matters. Also, the Councils are still expressing concerns about certain aspects of the LVIA (for example cumulative effects; mitigation effects; visual effects; and not factoring in local landscape designations and omitting important local character variations, which affect judgements	The Landscape and Visual Impact Assessment **[APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included within ES Appendix 8.1 **[EX6/GH6.3.8.1_B]**, which has been progressed and agreed with the Local Planning Authorities. It is worth noting that GLVIA3 is not prescriptive, only providing guidelines for the approach to Landscape and Visual Impact Assessment. This allows for some

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			about levels of effects). Indeed, regardless of the reasons why, the Councils appear to agree with SGHS's expert that levels of adverse landscape and visual effects have been underestimated. Should the Examining Inspectors consider it necessary, the Landscape Institute could be asked to clarify technical points of disagreement relating to LVIA / GLVIA3: they cannot comment on project-specific matters, but the inquiry can be 'anonymised'. However, it is important to note that in terms of predicted levels of effects, SGHS's expert agrees with many of the LVIA's findings, as summarised below. The Applicant's responses confirm that the proposed development would result in significant adverse effects on character and views. However, the expert's opinion remains that the level, extent, and duration of the adverse effects have been underestimated. As explained in representations, comments and responses, for reasons which are not clear, the LVIA did not assess effects on the character of the sites themselves, only their 'fabric'. However, evidently the direct effects on landscape character within the Scheme boundary could not be mitigated, and would be significant adverse from start to finish	degree of professional differences in approach to LVIA to be incorporated into methodologies for LVIA, however the core approach and principles of any LVIA must align with GLVIA3. The assessment methodology is agreed with both North Northamptonshire and West Northamptonshire under item LVIA-065 in the respective Statements of Common Ground **[REP5-098** and **REP5-100].** The LVIA **[APP-045]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure – and that this would result in Significant Adverse Effects, please refer to the **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]** where this is discussed in further detail. The LVIA **[APP-045]** acknowledges a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar

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			SGHS's expert agrees that indirect effects on character beyond the Scheme boundary would be significant adverse from Year 1 – Year 15, but also that levels would be higher than stated. The expert does not agree that alter Year 15, levels would fall below the significance threshold, partly because the LVIA does not factor in a) non-visual effects on character, and b) the adverse effects arising from the proposed screen planting that would result in loss of characteristic openness. SGHS's expert does not agree that by Year 15, there would be a significant beneficial effect on the sites' landscape 'fabric'. The LVIA erroneously assumes that proposed landscape / visual mitigation measures can be double counted as landscape / visual enhancements. At best, the effect would be Neutral, at worst significant adverse, the latter due to a) the planting being uncharacteristic (tall hedges), and b) the loss of characteristic openness. SGHS's expert agrees that visual effects would remain significant adverse for the duration of the operation, and that in some cases, mitigation is not possible. However, in many cases, levels would be higher than assumed because the LVIA does not factor in	infrastructure. With the 1km Study Area, Adverse effects remain through to the decommissioning phase, although reduced and no longer Significant as a result of the establishment of the mitigation planting. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." The Applicant would like to reiterate that the LVIA **[APP-045]** does not identify beneficial effects to Landscape Character as a result of the implementation of the landscape scheme during the construction period or operational lifetime of the Scheme, only to Landscape Fabric. The landscape proposals are substantial and the beneficial effects associated with these to landscape fabric are set out within the LVIA, with these beneficial effects only associated with the tangible gains provided to landscape fabric. It is fully acknowledged that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected, with the land now presenting as a large scale solar scheme. At the point the Scheme is decommissioned the landscape proposals help provide the

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			a) the high levels of adverse effects resulting from the total loss of a good view; b) the proposed screening measures being uncharacteristic; and c) it being highly unlikely that existing (and proposed) vegetation would continue to screen views for the duration of the operation.	long term legacy landscape benefits as set out within the LVIA **[APP-045]**.
SGHS-008	Landscape and Visual Impacts	Methodological concerns	*Applicant responses to Stop Greenhill Solar [REP4-021]* *ExQ – SGHS-012-018;074;075;083-085;092;093* We refer to the response above in respect of SGHS-011.	The Applicant notes this comment.
SGHS-009	Ecology and Biodiversity	Ecology and Biodiversity	*Applicant responses to Stop Greenhill Solar [REP4-021]* *ExQ – SGHS-007* Please see separate submission included above.	The Applicant is unsure which separate submission which is being referred to. The Applicant would refer to their responses to comments in Table 2.2 in the **Applicant's Responses to Stop Green Hill Solar [REP4-021]**.
SGHS-010	Human Health	Health, access to open spaces and mental health.	*Applicant responses to Stop Greenhill Solar [REP4-021]* *ExQ – SGHS-021* SGHS notes that the applicant refers back REP2-048 which, in turn, refers back to REP1-161. SGHS wish to point out that this does not amount to an adequate response on what are	The Applicant sought consultation with the relevant Local Planning Authorities, although responses were limited. That notwithstanding, the Applicant has responded to all comments and recommendations made by the local authorities and other statutory bodies during scoping and statutory consultation (see Table 18.2 in **ES Chapter 18: Human Health [APP-054]**). In the absence of direct

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			very important issues to local residents. SGHS has already raised the inadequacy of Greenhill documentation on health and mental health issues. Greenhill have stated, in response, that permissive paths, for example have been identified following consultation with local public health departments. However, Greenhill have actually stated that although they "reached out" to local public health departments they received no response. This has been confirmed by SGHS using a Freedom of Information request to North Northants public health department. Whilst SGHS respects the fact that efforts to consult were made, the relevant issue is that no consultations actually took place. Unless the applicant is able to provide details on any such consultations the examiners are requested to set aside the unqualified estimates provided within the documentation. The impact of lost access to the countryside is highly significant and will be adverse over time. Government health bodies prescribe – for example through the social prescribing schemes – access to countryside for those with health and mental health issues. Such access is either limited to walking through restricted areas of solar panels or, for periods of time, denied altogether where no such permissive paths are provided (acknowledged with respect to TP182 in REP2-050).	consultation with the relevant public health teams at the local authorities, these comments have been used to determine how to respond to the authorities' position on human health assessment methodology. However, it is acknowledged that within the Statements of Common Ground with North Northamptonshire Council **[REP5-098],** West Northamptonshire Council **[REP5-100]** and Milton Keynes City Council **[REP5-102]** matters relating to Human Health and Socio-Economics, Tourism and Recreation have been agreed. The assessment of the impact on loss of access to open space and the countryside ("open space, leisure and play") in **ES Chapter 18: Human Health [APP-054]** is based on the assessment outcomes of impacts to the PROW network and leisure facilities in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-053]** and finds no greater than a medium-term temporary minor adverse effect (not significant) during construction and a long-term minor adverse effect during the Scheme's operation (also not significant). This is based on a methodology that has been agreed by each of the respective local authorities. The Applicant understands the importance of access to the countryside for health and wellbeing,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				however does not agree that the impacts from the Scheme will be greater than low as described in Table 18.7 of **ES Chapter 18: Human Health [APP-054]** – specifically in relation to change in morbidity or change in quality-of-life or service quality implications. Finally, in respect of PROWs, the **OPROWPPMP [EX6/GH7.10_C]** commits to ensuring 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, with any required closures or diversions minimised in duration (also secured through the **OCEMP [EX6/GH7.1_C]**). These documents are secured through Requirements 13 and 18 of Schedule 2 to the **Draft DCO [EX6/GH3.1_E]**. The Applicant refers to 'SGHS-040' to 'SGHS-042' within the **Applicant's Responses to Written Representations [REP2-048].**
SGHS-011	Transport and Access	Traffic estimates, access to compounds and minor roads.	*Applicant responses to Stop Greenhill Solar [REP4-021]* *ExQ – SGHS-026-030* SGHS reiterates that existing and future traffic estimates have not been put together in sufficient detail or with the local knowledge that residents have been able to supply.	The Applicant maintains its position in regard to the conclusions of the analysis presented in the **Environmental Statement Chapter 13 - Transport and Access (Revision A) [REP2-003]**. All four highway authorities are satisfied with the assessment and overall approach as reflected in the corresponding SoCGs.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Delivery materials to key compounds and the use of local minor roads are likely to cause significant difficulties for all road users. It can also be predicted that the passage of HGV's along some of the local roads will cause deterioration to the verges and then to road surfaces.	Regarding the comment relating to the deterioration to the verges and road surfaces, the requirement to undertake road condition surveys and correct defects attribution to the Scheme is set out in section 5.3 of the **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C]**. This confirms that all stages will need to be agreed and the approach approved by the highway authorities.
Applicant's Response to [REP5-119]. The following statements are submitted in response to the matters arising from the Open Floor Hearings held during the week of December 9th 2025.				
SGHS-012	Human Health	House Prices and Mental Health Implications	Philip Anthony The applicant refers to previous answers (GH8.1.23) and KB-007 which in turn refers to an agreed scoping out of house price assessments. However, the answer given does directly respond to the earlier question on the basis that there is no evidence for such an effect. The applicant, by virtue of answering to PA-001 and KB-007 with substantive information, is therefore not ignoring the issue. The applicant does not respond to the quoted research by Dr David Rogers which confirms that house prices are indeed impacted by large scale solar proposals and the question is therefore justifiably included as part of an answer about the economic and health impacts of the scheme.	The Applicant maintains its position in regard to scoping out the assessment of house prices. This approach has been agreed as set out within the Planning Inspectorate's Scoping Opinion [**REP1-035**] under ID 3.13.2.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The issue should therefore be included as a material factor in consideration of the proposals, with its impact on local residents.	
SGHS-013	Human Health	Professional Experience	Philip Anthony The applicant continues to refuse to supply details of the actual academic qualifications of the technical lead and authors for the Statement of Competence. The citation of previous experience can only conceivably arise from projects that have been granted permission but not yet completed, therefore meaning that any such professional experience is not based on post-development evaluation and must remain in the category of speculation.	The Human Health Chapter **[APP-054]** has been prepared by a suitably qualified and experienced practitioner with professional experience in the preparation of environmental assessments. The Statement of Competence **[APP-065]** summarises the relevant professional experience of the author and technical lead. The NSIP process does not require the disclosure of individual academic qualifications. The Human Health assessment has been prepared in accordance with relevant planning policy and appropriate industry guidance. Within the Statements of Common Ground with North Northamptonshire Council **[REP5-098]** and West Northamptonshire Council **[REP5-100]**, matters relating to the assessment methodology and outcomes of the assessment of Human Health have been agreed. It is also acknowledged that matters have largely been agreed with Milton Keynes City Council **[REP5-102]**; however, one matter remains outstanding regarding the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				appointment of the Community Liaison Officer.
SGHS-014	Human Health	Consultation	Philip Anthony GH6.2.18 states that: "The scope of consultation was agreed with the host local authorities through the Statement of Community Consultation, with any additional required consultation being undertaken following statutory consultation and prior to DCO submission". The applicant has failed to provide any documentary evidence of meetings held with public health bodies, or whether "additional required consultation" was undertaken, or what the actual advice from Office of Health Disparities and Improvements was. The "suitable mitigation measures" quoted are largely short term but the possible impact on residents of Oakfield is recognised and welcomed. In an answer relating to GE-001 (the comment submitted by GE), regarding his depression about the installation of panels, is responded to with a suggestion that specific mental health support should be obtained. This is not only a patronising response but a tacet acknowledgement that the impact of the development is real.	Please refer to the response to 'SGHS-010' above which outlines engagement with the Local Planning Authorities. The Applicant's response to GE-001 within the Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses **[REP3-128]** was not intended to be dismissive of the concerns raised. The comment referred to personal mental health matters that are ongoing, rather than at the point of the Scheme being developed, and, accordingly, the Applicant sought to signpost the individual towards appropriate sources of support as may be required at this present moment. The response to GE-001 acknowledges the assessment of mental health effects in **ES Chapter 18: Human Health [APP-055]**.
SGHS-015	Human Health	Consultation	Philip Anthony The applicant states that consultation events were not held in Mears Ashby or Holcot due to	An event at Walgrave Village Hall was considered sufficient to serve communities in Walgrave and Holcot. Therefore, a

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			"lack of suitable venue availability". This response is hard to swallow. Both locations have excellent village halls and booking availability on a regular basis. This response is wrong in point of fact and unacceptable.	separate event at Holcot Village Hall was not required. The Applicant enquired with Mears Ashby Village Hall; however, due to limited availability, lack of adequate parking provisions and proximity to public transport, the Applicant selected venues that were aligned with the criteria for consultation venues. The Applicant prioritised venues that offered adequate parking facilities and were located close to public transport links. The criteria for consultation venues also considered reasonable travel distances from neighbouring villages and towns.
SGHS-016	Human Health	Assessment Undertaken	Philip Anthony In defending the basis of assessment, the applicant initially falls back on previous points about available data and consultation. The applicant then falls back on "professional judgement" (already criticised above in PA-002 and previously), and apparently from "other types of development". None of these "other types of development" are referenced and the examiners are entitled to request further details. The applicant continues to insist on consequences that are "not significant adverse	The Applicant does not rely solely on "professional judgement" as suggested. The assessment is based on the available baseline data, consultation with relevant authorities, the application of recognised assessment methodologies, literature review of health impact assessments from energy infrastructure development (onshore wind and nuclear), transport infrastructure, and the author's own experience of large-scale solar and residential development. The assessment of effects on human health from the Scheme is directed by the industry policy and guidance as set out in Section 18.3 of **Chapter 18: Human Health [APP-**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			effects" without good supporting evidence and relying on dubious, contestable judgements.	**055]** and **Appendix 18.1: Human Health Legislation, Policy, and Guidance [APP-169]**, and on the technical assessment work undertaken across the Environmental Statement by other members of the Applicant's team. Professional judgement is applied where the assessment outcomes across the ES are required to be considered with a specific human health "lens", taking into account baseline conditions, where vulnerable sub-populations have been identified, and how likely it is that those groups would be disproportionately affected by the Scheme.
SGHS-017	Cultural Heritage	Heritage and historic character	Nick Frampton The initial documents and drawings released by the Applicant, (available in the local libraries) showed fields already (supposedly) released from the scheme. (I personally took a copy of these). The reality is that the scheme was designed around a maximum land grab, right up to the edges of the village, with a view to then releasing fields closest to the village to give the impression that they are removing fields to appease the residents, thereby getting the maximum land take that they wanted.	The design and extent of the Scheme has been subject to an iterative process involving the Applicant, the design team, the environmental consultant team and is informed by feedback from statutory consultees, host authorities and local communities through the scoping and consultation process. During the early stages of the design process, a broader land area was identified to allow for flexibility in design whilst comprehensive environmental, technical, and planning assessments to be undertaken. This is standard practice in the design of schemes of this nature. Preliminary layouts were produced to inform the early surveys and data collection, the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				scoping of environmental topics and receptors. Parameters such as offset distances were informed by the technical consultant team based on their professional judgement and experience of solar developments. Following detailed assessment, consultation, and design development, the scheme boundary is iteratively refined to respond to environmental constraints, technical considerations, and feedback received. The removal of panels from certain fields from the Scheme reflects this iterative design process and demonstrates a responsive and proportionate approach to site planning. The fields that are located within the Order Limits which are proposed for landscape and ecological mitigation land and not panels are proposed as such in the **Works Plan [EX6/GH2.4_G]** and marked as either Works Numbers 6 or 9. This means that they cannot be used within the Scheme for any other purpose without the need for consent to be given. The **Works Plan [EX6/GH2.4_G]** is secured in the **draft DCO Revision E [EX6/GH3.1_E]** as a certified document in Schedule 13.
SGHS-018	Transport and Access	Highfield Road	Nick Frampton	The access points on Highfield Road are identified to provide both flexibility during construction and so that access can be

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Multiple access points on Highfield Road will do nothing, other than create excess verge damage and multiple points of conflict and delay on an already narrow road, 4.3m wide, where 2 HGV's cannot safely pass. This is a significant commuter route through to the A45, and a significant cut through to Mears Ashby school from the north side of Wellingborough. School pick-ups are around 3pm and many return to the Wellingborough area. This falls within the stipulated working day for GHS and significant delays will occur. Motorist will take risks and accidents will happen. Motorist will be forced off the road on to the verges and the HGV,s will do similar. Who will repair the damaged road edges and verges? Who will oblige them to do so? The highway authority are not their paymasters. They have no jurisdiction over the contractors' actions or inactions.	maintained during the operation phase. It is not proposed that all access points are necessary to be in place and in use at the same time. The multiple access points affords flexibility across the construction programme with the ability to respond to various activities and traffic levels at the time. The approach to traffic management at Highfield Road is specifically considered in the **Environmental Statement Appendix 13.2 Transport Assessment Part 1 of 3 (Revision A) [REP3-036]** where it is identified that alongside the flexible use of access points, the use of a haul route through Green Hill D and / or the provision of passing places can be used. These different approaches might be appropriate at varying times across the construction period. Restriction to working hours are identified in section 6.2 of the **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C**] which includes the specific consideration of local schools in the vicinity of access points. Detailed CTMPs, will be submitted prior to the commencement of the construction phase. The requirement to undertake road condition surveys and correct defects attribution to the Scheme is set out in

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				section 5.3 of the **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C]**. This confirms that all stages will need to be agreed and the approach approved by the highway authorities.
SGHS-019	Ecology and Biodiversity	Impacts to habitats and hedgerows	Linda Twohey Important hedgerows: Greenhill explain where to find the definition which is understood. However, the point is that these are legally protected, and permission is needed to remove them. Therefore, it makes sense to design the scheme to minimise the removal of any part of important hedgerow. APP-192 shows that fields AF29 and AF14 are surrounded by important hedgerows; so different choices of within Site design would reduce this impact. The fact that Greenhill intend to plant more hedgerow is irrelevant; they can do that anyway, but they will not have the same value as long established hedgerow for ecological, landscape, and historical reasons. Bat roosting sites: Greenhill repeat information already in their documentation which describes what actions they will take during construction to minimise impacts. But bats will not stay roosting in trees near a 6.8 metre substation emitting buzzing and noise, so mitigation during construction is irrelevant as long term use of these potential roosting sites will be negated. They need to explain why they have chosen	<u>Important Hedgerows</u> Important hedgerows are present around fields AF29 and AF14. These hedgerows will all be retained, with the exception of minor losses for access. Existing access points will be utilised wherever practicable, including the existing farm access to the north of AF14. In addition, solar panels have now been removed from field AF29 as per Change 4 of the **Change Application and Supporting Environmental Information Report [CR2-024]** which was accepted by the Examining Authority on the 25 February 2026. <u>Bat Roosting Sites</u> The Green Hill Sites contain numerous trees which have the potential to support roosting bats, based on Ground-Level Tree Assessments which have identified Potential Roosting Features. This includes several trees in proximity to the proposed substation in AF24. It should be reiterated that the actual presence of roosting bats is

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			field AF24, near a concentration of the most suitable trees for bat roosts, for the substation. Why not choose AF22 or AF 23? They state there are receptors near AF17, but why not at the eastern edge of AF17? Surely it makes sense for the substation to be easily accessible by road? Ground-nesting birds: Skylarks – Greenhill admit to a significant adverse effect. So why not remove 2 fields from the scheme in Site A which has the highest density of Skylark nests within the whole scheme? This also has the linked benefits of protecting the use of the Quiet Lane for recreation by significantly reducing the adverse landscape and visual impact, and potential noise, and disturbance during construction. Overall, it appears that there is more scope within the whole Green Hill Solar scheme to take more fields out from solar arrays, and the Applicant has not at any 5me explained why they need to use so much land. Breeding birds of boundary habitat: Yellowhammers – my point was that I know from personal observation over about 30 years that yellowhammers are concentrated in the hedgerows surrounding field AF29. Their assessment of neutral impact seems unlikely to me, as these birds will not stay or breed during the disruption of construction, which could potentially be avoided. It is part of the joy of walking or cycling along Newland Road to see	not confirmed, only that the trees have potential to support them. Bats may be disturbed by noise and vibration; especially novel and irregular or especially loud noise. Given the predicted noise levels associated with the substation (**ES Chapter 15: Noise and Vibration [APP-051]** refers), as well as the distance between the substation and trees by virtue of the implemented protective ecological buffer zones, it is not considered that the presence of the substation would result in any significant impacts on roosting bats (if present). Moreover, the Scheme proposes to install a large number of bat roosting features within hedgerows and trees across the Sites, including Green Hill A as set out in the **Outline Landscape Ecological Management Plan [EX6/GH7.4_D]**. This will constitute an enhancement, delivering a net gain in potential roosting opportunities for bats. <u>Ground-nesting birds</u> Whilst Green Hill A has relatively high densities of skylarks, there are numerous interdisciplinary considerations around field selection for development. Skylark mitigation is delivered at a landscape scale by the Scheme, considering the county-

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the yellowhammers perching on the top of the hedgerows and singing their characteristic song in the spring and summer. Greenhill quote their document ES Chapter 5: Alternatives and Design Evolution [APP-042] as setting out the reasoning for design choices made at Green Hill Site A. However, all this does is to talk about the general principles of overall site choice and design and does not in any way detail specific reasoning for choices within each Site. It could have detailed their considerations used to choose the positioning of the substation, for example, but it doesn't. I have speculated on some of the reasoning for choices in my OFH statement, but the Applicant does not enlighten us any further.	level population. Moreover, field AF29 will now be utilised as an ecological mitigation field and will be managed to be suitable for breeding skylark for the duration of the operational phase of the Scheme. This avoids the loss of a further two skylark territories which were recorded within this field during baseline surveys. <u>Breeding birds of boundary habitat</u> With regard to yellowhammer, as noted above, AF29 will now be retained, and all existing hedgerows around this field will be managed to maximise their ecological value, as per the **Outline Landscape and Ecological Management Plan (Revision E) [EX6/GH7.4_E]**. Effects on breeding birds of boundary habitats, including yellowhammer, are predicted to be neutral during construction and beneficial at a Local level during operation. Construction phase impacts will be temporary, and the wide undeveloped hedgerow buffer zones secured through the design of the Scheme will serve to reduce the likelihood of disturbance during construction. Operationally, the enhanced foraging and nesting opportunities delivered by the landscape planting will be beneficial for yellowhammer.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				ES Chapter 5: Alternatives and Design Evolution [APP-042] Environmental Statement Chapter 5: Alternatives and Design Evolution provides an overview of the iterative design process. Table 5.8 outlines that within Field AF15 solar panels were sited further to the east than original concept plan due to topography and views from the existing property on Newland Road. Table 5.9 outlines that increased buffer areas on AF20 and AF22 to avoid high flooding risk areas. As well as following a visit carried out by members of the project team to discuss concerns with the owners of the Acorn Centre, south of Green Hill A, it was agreed to move the location of the substation northwards to AF24 to mitigate potential noise impacts on the visitors of the Acorn Centre (this is also outlined in Table 5.10). The position of the substation in AF24 is electrically efficient due to its proximity to the cable route corridor and central location within Green Hill A. Ditch offsets were also increased to 9m within Green Hill A, A.2, B and G as requested by West Northamptonshire Council and Milton Keynes City Council.
SGHS-020	Transport and Access	Impacts specific locations	Linda Twohey	Construction traffic will not use Newland Road to directly access Green Hill A.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			The Applicant states that they were aware of Newland Road's Quiet Lane status before public consultation, saying that this is why it wasn't proposed to use it directly for construction traffic. However, the reason it can't be used for construction traffic is more basic; it is a narrow single track rural lane with broken down edges totally unsuitable for larger load vehicles. If they were already aware of the Quiet Lane designation (the representative I spoke to at the consultation appeared unaware), this fact did not appear anywhere I could find in the PEIR. And my whole point is that if they were aware, they could have made choices to Site A's layout which did more to minimise the impact on this important recreational resource for the village.	Avoiding traffic movement along Newland Road was identified as a requirement at an early stage of the design. Field to field crossings are proposed with movements across Newland Road. Construction traffic will entre Green Hill A from Broughton Road via access A1. Compounds will allow vehicles to unload material for onward transport to fields comprising Green Hill A. The movements across Newland Road will be managed to ensure the safety of users on Newland Road, prioritising those users above the construction traffic movements.
SGHS-021	Scheme Description	Alternatives	Linda Twohey Greenhill provide a rationale for not using AF17 for the substation, but not a rationale for choosing AF24.	As outlined in **Environmental Statement Chapter 5 [APP-042]** a visit was carried out by members of the project team to discuss concerns with the owners of the Acorn Centre, south of Green Hill A, following engagement it was agreed to move the location of the substation northwards to AF24 to mitigate potential noise impacts on the visitors of the Acorn Centre. As outlined in the Applicants response to LT-003 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses **[REP3-129]** there are sensitive noise receptors located

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				(A001 and A012, as shown on the ES Figure 14.6 Sensitive Noise Receptors at Green Hill A and A.2 **[APP-454]**) which are located on the opposite side of Broughton Road to field AF17, which would be closer to the substation than any receptors with it being located in AF24. AF24 is located within the floor of the gently rolling landform of Site A. This gentle change in landform allows for the taller infrastructure associated with the substation to be more accommodated within the receiving landscape by using the existing landform and vegetation to provide screening of the infrastructure from the wider countryside. See Figure 8.3.1 Landform A & A.2 [**APP-252**] AF24 is located away from nearby visual receptors. It is located towards the middle of the countryside between Kettering Road (TR033) to the south and Newland Road (TR100) to the east ensuring limited visibility from the adjacent highway network. Equally, the Substation is located away from nearby residential receptors, with the nearest being the two properties at Walgrave Lodge (RI11 & RI12) approximately 720m to the west of the proposed location for the Substation. The nearest PRoW (TP024) is located approximately 780m east of the Site.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The position of the substation in AF24 is electrically efficient due to its proximity to the cable route corridor and central location within Green Hill A.
SGHS-022	General Matters	DCO Process	Linda Twohey I realise it is not within the Applicant's power to address the NSIP process, but I feel that they could have presented their DCO application documentation in a manner which made it more accessible to the general public, and demonstrated genuine response to the public consultation process by clearly making changes as a result of it. In conclusion, I am not in any way satisfied with the Applicant's responses to my OFH submission, as they have not answered the questions that I raise. Please can the Applicant explain why they cannot take fields AF29 and AF14 out of the scheme, redirect construction traffic to the west part of the site, and find an alternative site for the substation.	The Applicant notes this comment. The Applicant has removed panels from AF29 as included in the Applicants Change Request 2 under Change 4, outlined within the **Change Application and Supporting Environmental Information Report [CR2-024**]. In relation to AF14, the Applicant has assessed the impacts of the Scheme on Newland Road. Within **ES Chapter 8: Landscape and Visual Impact Assessment [APP-045],** a significant effect is identified during construction and operation (Year 1). However, by Year 15, the proposed mitigation, particularly that located immediately alongside the road, would screen views into the Site and the effect would reduce to not significant. Newland Road has also been assessed within the **Glint and Glare Technical Note** [**REP2-054**], the findings of which confirm a low impact to road users. Within Chapter 14: Noise and Vibration, LT2 was identified as a monitoring location along Newland Road, with receptors A010,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				A011 and A006 assessed. No significant effects were identified. Ecological considerations for AF14 are outlined in the response to SGHS-019 above. The Applicant's position is that appropriate mitigation measures are set out in the outline management plans and suitably secured to make the inclusion of panels on AF14 acceptable in the Applicant's view. The further removal of panels would reduce the benefits of renewable energy generation by the Scheme.
SGHS-023	Agriculture and Soils	BMV	Linda Twohey Again, they do not explain the within-site design decisions for Site A in terms of Agricultural Land Classification.	The Applicant refers to response to 'LT-005' in **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP3-129]**. As set out in the **Design Approach Document [APP-560]**, **ES Chapter Alternatives and Design Evolution [APP-042]** and **ES Appendix 5.1 Site Selection Assessment [REP1 -037]** agricultural land classification is just one of the environmental considerations in the layout and design evolution.
SGHS-024	Transport and Access	Newland Road construction traffic	Linda Twohey They have not answered the question at all. They need to explain why as maintenance routes for the west side of Site A will be from the Broughton Road near Old, why can't	The consideration of taking construction access from Broughton Road west of Newland Road was considered at the early feasibility stage. Due to limited visibility, the alignment of Broughton Road to the west of

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			construction routes be also from the Broughton Road to avoid any construction traffic having to cross Newland Road? This would also avoid any need to close Newland Road at any time during construction. If also fields AF29 and AF14 were removed from the scheme (or used for arable, mitigation or wild flowers) there would be no need to build a vehicle track through important hedgerows.	Newland Road and the approach towards minimising access numbers, the proposed access arrangement was carried forward. This allows a single compound, accessed from the Broughton Road east of Newlands Road to be in place. Movements trough Green Hill A and across Newland Road can be managed, ensuring smaller scale vehicles are regularly used and managed to ensure the safety of users on Newland Road. There is an existing crossing over the existing watercourse in Site A which minimises the extent of hedgerow removal for the construction of the Scheme.
SGHS-025	Landscape and Visual Impacts	Site A impacts	Katherine Wilson Katherine Wilson responded that "All the responses are incredibly woolly and just direct to an already written page/paragraph/number in their many thousands of pages of writing, which indicates that they have no interest in the public response. The other point I make is over my disagreement with GHS use of the word temporary for the sixty-year installation. Their response is "the scheme is temporary ". My Collins dictionary defines temporary: "lasting only a short time". GHS obviously have a very different definition of the word temporary."	The Applicant notes these comments regarding the format and content of the Applicant's responses during the Examination. The Scheme is considered temporary because the Scheme is subject to a 60-year consent and is not permanent. It should be noted that 60 years is the maximum lifetime the Scheme is permitted to operate; following which the Scheme would be decommissioned. In respect of decommissioning, Requirement 21 of Schedule 2 to the **Draft DCO Revision E [EX6/GH3.1_E]** requires the Scheme to be decommissioned in accordance with a decommissioning plan to

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. Please refer to the **Outline Decommissioning Statement Revision C [EX6/GH7.3_C]** which provides details and control measures of decommissioning activities. Accordingly, the Scheme would not constitute 'permanent' development, as it would be decommissioned and the land restored at the end of its operational phase.
SGHS-026	Human Health	Mental Health and financial burden	Gary Elliott Greenhill solar response to my comments about mental health is patronising in the extreme. With respect to screening via tree planting and hedging, I repeat my doubts that this will screen the solar panels for many years if at all.	The Applicant's response was not intended to be patronising or dismissive of the concern raised. The representation referred to personal mental health matters that are ongoing; the Applicant therefore sought only to acknowledge the concern and signpost the individual towards appropriate sources of support as may be required at this present moment. The Landscape and Visual Impact Assessment **[APP-045]** recognises that the proposed landscape mitigation measures will take time to establish as set out within para 8.8.12 to 8.8.15 of the LVIA **[APP-045]**. The LVIA has assumed a uniform rate of growth is allowed for trees, shelterbelts, and

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached a minimum height of 7.5m. A uniform growth rate is also allowed for new hedgerows of 0.4m every 1 year, resulting in hedgerows being able to be maintained at a height of 4.5m by Year 15. In practice, growth rates are species-dependent and will vary according to local conditions such as soil conditions and growth competition. Under favourable conditions, faster growing native pioneer species are likely to achieve or exceed the proposed growth rates, whereas slower-growing native species may establish more gradually. The use of a uniform growth rate has therefore been applied to represent an average rather than a site-specific prediction. The 0.4m per year growth rate has been calculated based on professional experience and through consultation with national nurseries such as Hilliers. The 0.4m growth rate has been provided to give a uniform worse case average across the 15-year establishment period, with expected growth rates considered in actuality to be greater. However, it is likely that growth rates could fluctuate year on

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				year depending upon external factors such as climate and weather, and so the 0.4m growth rate is used to provide a uniform worse case average. The **OLEMP [EX6/GH7.4_E]** sets out the framework for the planting, management and monitoring of landscape mitigation. The OLEMP is secured through Requirement 7 of the **Draft DCO Revision E [EX6/GH3.1_E].** Existing hedgerows are to be allowed to grow out and will be managed to a height of 4.5m. Changes in management of existing hedgerows to allow for managed vertical growth would allow for existing hedgerows to reach a height of 4.5m sooner than proposed new hedgerow, however the Year 15 time period allows for both the proposed and existing to have reached the desired 4.5m. This prescription applies to both new and existing hedgerows. Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the **OLEMP [EX6/GH7.4_E].** This includes measures for the formative pruning and ongoing long term management of proposed and existing hedgerows, trees and woodland within the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the **Draft DCO Revision E [EX6/GH3.1_E].**
SGHS-027	Agriculture and Soils	Farmland and Food Security	Gary Elliott The reports I have already stated show that land loss for all reasons will result in food self-sufficiency dropping from 60% to 35% in the next 25 years. For a small island nation such as this, surely this is unsustainable.	The Applicant notes the comment, the report and the potential risk. However, the 1200ha land for the proposed Scheme represents only 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK therefore it is not considered to have a significant impact on national food production and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The conversion of land currently under arable use to grassland would be a long-term fallow and will enhance the quality of the soils and land in long term. The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Scheme can serve as a strategic land reserve underpinning national food security.
SGHS-028	Agriculture and Soils	Sheep grazing	Gary Elliott Examples may exist but the contribution to food production is not significant compared to the	Please see the Applicant's response to SGHS-027 with regard to food security.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			arable production being lost to solar farming on good soil.	
SGHS-029	Agriculture and Soils	Farmland and Food Security	Gary Elliott The claim that converting arable land to grassland will enhance the soil over the lifetime of the project is not accepted or proven. Suggesting that using the land amounts to creating a strategic reserve is a bizarre claim. Site B (Holcot) is, in this farmers' opinion, of BMV status and quality. I have no authority to take sample from the land but do not support their conclusion. In summary, this project will remove 1200 hectares of good agricultural land from production and render it an industrial landscape. There are more than enough warehouses in the County accommodate solar panels.	The agricultural land classification grading for each Site in the Scheme is set out in **ES Chapter 20 Agricultural Circumstances [APP-057]** in Table 20.3. Site B is classified as a 4.5% Grade 2; 37.5% Grade 3a and 21% Grade 3b. Therefore it is deemed to contain 41.9% as best and most versatile land. Non tilliage or minimum tillage is a common practice to improve soil health by reducing disturbance, which increases soil organic matter, improves structure, and boosts water retention. Defra support non-tillage (zero-till) and minimum tillage (min-till) and fund these techniques via funded via the Sustainable Farming Incentive (SFI). With regard to food security, please see the Applicant's response to SGHS-027.
SGHS-030	Design and Alternatives	Use of the Links	Shena Howell The applicant's response to my suggestion to remove fields FF10, FF11, FF19 from the order limits and replace the land, if necessary, with the area known as the links has, in my view, not been given due consideration. The links is eminently and patently MORE environmentally suitable due to the following reasons	The Scheme design has been established to reduce impacts to Grendon and Easton Maudit Conservation Areas. Attention has also been made to the kinetic experience to heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). As such, the visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			1. It is not as intrusive upon the hamlet of Easton Maudit and the Grade 1 church of St Peter and St Paul 2. It is not as visually intrusive upon the population of Grendon who look towards Easton Maudit 3. It would not impact on the several PROWs between Easton Maudit and Gendon (as there are none on the links) 4. It would, therefore, not have such a detrimental impact on the villages of Bozeat, Grendon, Strixton and Easton Maudit who use those PROWs on a regular basis to travel from village to village as we do not have pavements. 5. It would not therefore have the guaranteed destructive effect on the Internationally acclaimed Waendel walk with over 3k visitors annually and the tourism money that brings to the area. If the applicant could exclude fields FF10/FF11 and FF19 it would make a material difference to the impact of the scheme on our rural communities. Whether this is achieved by substitution (ie using the links or by simple exclusion), the negative impacts for the communities would be minimised.	particular, along PROW with historical associations / views between heritage assets. Solar panels have either been removed (i.e. Fields FF9, FF13, FF14, FF16 and FF22) or offset (Fields FF11, FF15, FF19 and FF26) away from Conversation Areas, and enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Areas. **ES Chapter 12: Cultural Heritage [APP-049]**, supported by **ES Appendix 12.1: Heritage Statement [APP-110 to APP-120]**, has identified a moderate adverse effect would occur as a result of the Scheme to the Mears Ashby and Easton Maudit Conservation Areas, and the Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784). Statements of Common Ground with North Northamptonshire Council **[REP5-098]** and Historic England **[EX6/GH8.3.4_A]** outline agreement to the heritage assessment. The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				proposed has reduced harm to the lowest achievable levels. With respect to PROWs or recreational use of the countryside, the area understood to be The Links (marked as "golf course" on OS maps from the 1950s, grid reference SP876582) is not fundamentally more appropriate than FF10, FF11 and FF19 due to the presence of footpath WN|LE|1, bridleway NN|TD|9 and WN|LE|26, and the unnamed road, all of which provide access between Easton Maudit and Yardley Hastings and Castle Ashby. There is no evidence to suggest that the land referred to as The Links is available. The availability of willing landowners is an important consideration in site selection as set out in the **ES Appendix 5.1 Site Selection Assessment [REP1-037].** In regard to the Waendel Walk, the permissive access along the eastern boundary of Field FF19 has been retained for use during the International Waendel Walk Weekend during the Scheme's operational lifetime, this is secured within the Outline Public Rights of Way and Permissive Paths Management Plan **[EX6/GH7.10_C]**. Furthermore, construction management measures to protect the event participants have been set out in the **OCEMP [EX6/GH7.1_C]**. These

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				measures are secured by Requirements 13 and 18 in Schedule 2 of the **Draft DCO [EX6/GH3.1_E]**, and have been drafted to accord with the recommendations made by the event's organisers: Wellingborough Town Council.

2.2 West Northamptonshire Council (WNC) Local Highway Authority (LHA)

Table 2.2: [REP5-113]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WNC-001	Traffic and Transport	Transport Assessment: Traffic Impact	The need for junction capacity assessments will be determined following agreement on trip rates. This work is ongoing with the applicant to submit further supporting evidence for their trip rates. *Trip rates agreed following clarification and evidence for the shuttle bus arrangements. See response to 4.106 to 4.119 below.* ***Matter resolved.***	**Response to WNC-001 to WNC-020.** The Applicant acknowledges the comments raised in REP5-113 and notes that the outstanding matters previously under discussion have now been resolved. Outstanding matters in the West Northamptonshire Statement of Common Ground under Section 3.13 have been progressed to agreed. An updated Statement of Common Ground will be submitted at Deadline 7.
WNC-002	Traffic and Transport	Transport Assessment: Personal Injury Collisions	The applicant has provided clarity of the location of PIC assessments in the TA. This matter is resolved. ***Matter Resolved.***	
WNC-003	Traffic and Transport	Transport Assessment: Public Transport	The applicant's response is acknowledged and it is agreed that the proposed shuttle minibus system provides an appropriate alternative to public transport. It is acknowledged that public transport is unlikely to be a viable option for the vast majority of workers travelling to often rural and isolated sites where services are either infrequent or non-existent. The temporary nature of the construction impact means that a temporary solution is appropriate. Permanent public transport improvements to serve construction workers would not be sustainable or proportionate. ***Matter Resolved.***	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WNC-004	Traffic and Transport	Transport Assessment: Legislation, Planning Policy and Guidance	Public transport has been addressed as per response to ref. 4.73 to 4.74. The applicant has set out their response to the potential for construction traffic to affect existing pedestrians and cyclists outlining why the development does not meet the threshold for further assessment. This is accepted by the LHA. ***Matter resolved.***	
WNC-005	Traffic and Transport	Transport Assessment: Access to Sites within the Scheme	The applicant's transport consult met with the LHA on 19 th November 2025 to discuss all site accesses raised by the LHA in West Northamptonshire Council's Local Impact Report. Discussions are ongoing at this stage and the applicant is due to submit amended drawings in due course for review. ***Matter not resolved.*** *Document EX3/GH6.3.13.2_A – Environmental Statement Appendix 13.2: Transport Assessment, Revision A (Part 3 of 3), submitted at Deadline 3 has all links to access routes blanked out. This does not allow for full review and query regarding access to Cable Roue Access 16 cannot be resolved without this information being available.* *The LHA has not been informed that access drawings have been updated yet by the Applicant's Transport Consultant or additional information on potential mitigation for access/es of concern (agreed approach at meetings in November).* *The revised Outline Construction Traffic Management Plan Revision B confirms in table 4.3 that access to Cable Route Corridor Access 16 will be right in/ left*	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			out. This means that cable drum HGV's will approach from the north (A45) and not via the A428 and Cogenhoe village. This query is resolved. *Updated access drawings for sites A, A.2 and B provided to the LHA 22/02/2026.* *Visibility splays with accompanying traffic speed have been added to drawings along with locations of localised vegetation removal/ management. With the exception of Access B1 and Crossing 1, compliant visibility splays can be secured within land under the control of the applicant or within the public highway.* *Access B1 has substandard visibility to the east by approximately 16 metres. It is recognised that a "one step below" relaxation for Stopping Sight Distance (SSD) can be applied in these circumstances (as per DMRB). Following discussions with the applicant, it has also been confirmed that a form of mitigation can be secured through the detailed design and Road Safety Audit process (for example temporary speed limit).* *Crossing A1 is impacted by vegetation which is unlikely to be fully removed. It will be necessary to manage this crossing point by temporary speed control or temporary traffic control.* *The revised Outline Construction Traffic Management Plan Revision B confirms at paragraph 5.2.2 that each site and cable corridor access will be subject to detailed design and Road Safety Audit.*	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			"5.2.2 Prior to commencement of construction, the design of each access will need to go through detailed design, including Road Safety Audits, and be technically approved by the relevant highway authority." ***Matter resolved.***	
WNC-006	Traffic and Transport	Transport Assessment: Access to Sites within the Scheme	The applicant has responded to the point regarding the need for Stage 1 Road Safety Audit (RSA) for new and upgraded site accesses (and any mitigation measures). Whilst the LHA acknowledges the applicant's comments regarding RSA and the standard protocol for undertaking such audits post-consent, it has been agreed that where the LHA has specific safety concerns (particularly relating to sub-standard SSD or mitigation measures), an RSA 1 may be undertaken. This matter is still under discussion. ***Matter not resolved.*** *Document EX3/GH6.3.13.2_A – Environmental Statement Appendix 13.2: Transport Assessment, Revision A (Part 3 of 3), submitted at Deadline 3 has all links to access routes blanked out. This does not allow for full review and query regarding access to Cable Roue Access 16 cannot be resolved without this information being available.* *The LHA has not been informed that access drawings have been updated yet by the Applicant's Transport Consultant or additional information on potential*	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			mitigation for access/es of concern (agreed approach at meetings in November). *See response to access queries above.* ***Matter resolved.***	
WNC-007	Traffic and Transport	Transport Assessment: Forecast Trips	Forecast HGV trips derived from comparable solar schemes at Cottam and West Burton are considered acceptable. Clarification has been provided on the total number of workers across the sites. This has addressed WNC's query regarding observed inconsistencies. With regards to WNC's concern about a potential shortage of hotel accommodation for workers (thereby bringing into question the assumption over the number of workers arriving by minibus), the applicant has pointed to ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054], where it sets out the potential for up 13,500 rooms available across Northamptonshire, Bedfordshire and Milton Keynes. This goes some way to satisfying WNC, however the applicant is to provide further information to support the hotel and minibus provision, including how this has operated successfully at other solar DCO sites. It is noted that other recently consented DCO's for similar developments have applied even greater discounts on worker trips owing to the use of hotels and shuttle minibuses. This matter remains under discussion at this stage but progress has been made. *The applicant has submitted docume"t EX'/GH8.2.6 - Transport Technical Note: Shuttle Bus Service*	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Supporting Document. This document outlines the benefits of providing shuttle buses in reducing worker private vehicle trips. The document additionally sets out 8 previously approved Solar DCO projects where shuttle buses were utilised and the SoS accepted a percentage of workers arriving at site by this method of travel ranging from 47% to 100%. It is therefore considered that the applicant's approach is consistent with similar projects and the trip generation and distribution set out in the transport Assessment can be agreed. The DCO will make provision for the requirement for a Construction Worker Travel Plan (through the detailed Construction Traffic Management Plan (CTMP)) where exact arrangements of the shuttle bus arrangement can be set out in detail. ***Matter resolved.***	
WNC-008	Traffic and Transport	Transport Assessment: Vehicle Trip Distribution	Worker shuttle minibus trip distribution to be confirmed following submission of additional information from the applicant. The applicant has provided a response to Q20.0.02 in the Applicants Responses to ExA First Written Questions [REP1-163] with regard to the origin of HGVs and HGV routes. WNC considers that the HGV construction traffic routes as currently proposed are appropriate and that measures to deal with non-compliance recording and reporting have been addressed (OCTMP Revision A). ***Matter resolved.***	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
WNC-009	Traffic and Transport	Transport Assessment: Construction vehicle management measures	Clarification has been provided by the applicant on the use or otherwise of accesses required for cable route access beyond construction. This is resolved. Parking is addressed in response to 4.146 to 4.148 as below and is still under discussion. ***Matter resolved.***	
WNC-010	Traffic and Transport	Transport Assessment: Decommissioning Phase	No further action required on this point. ***Matter resolved.***	
WNC-011	Traffic and Transport	Transport Assessment: Abnormal Load Routing	WNC acknowledge the abnormal load route through Wootton and Cogenhoe is an established one having previously served Grendon Substation. ***Matter resolved.***	
WNC-012	Traffic and Transport	Outline Construction Traffic Management Plan (OCTMP): Parking	Matter still under discussion but WNC pleased to have assurances that construction traffic (including worker vehicles) will not be permitted to park outside of site compounds and this will be secured through the Construction Traffic Management Plan and Construction Worker Travel Plan. This matter will be concluded following resolution of the above matter of forecast trips which is inherently linked to parking provision and management. *Document OCTMP Revision B [1EX3/GH7.9_B] provides greater clarification on matters related to parking. This includes clarification on the provision of parking within compounds, use of shuttle buses, monitoring of streets surrounding sites and car sharing assumptions. The Construction Worker Travel Plan will be the control mechanism and it will be a requirement that the document is submitted for*	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			approval to Local Planning Authorities (for consultation with the LHA). ***Matter resolved***	
WNC-013	Traffic and Transport	Outline Construction Traffic Management Plan (OCTMP): Access Points	As per 4.103 to 4.105 above. ***Matter not resolved.*** ***See response to access queries above. Matter resolved.***	
WNC-014	Traffic and Transport	Outline Construction Traffic Management Plan (OCTMP): Deliveries	Matter still under discussion but system set out in OCTMP Revision A [REP1-145] is noted. *Further detail for the management of deliveries has been provided in OCTMP Revision B [1EX3/GH7.9_B] including more clarity on electronic delivery booking system and a clearer HGV signage strategy.* ***Matter resolved.***	
WNC-015	Traffic and Transport	Outline Construction Traffic Management Plan (OCTMP): Worker Travel	As per 4.73 to 4.78 above. ***Matter resolved***	
WNC-016	Traffic and Transport	Outline Construction Traffic Management Plan (OCTMP): Construction Traffic Routing (Non-Abnormal Loads)	WNC note that Transport Assessment (Part 1 and 2) [APP-151 and APP-152] includes swept path analysis for each of the site accesses as well as select parts of the HGV routes. Cable drum vehicle deliveries were discussed at a meeting with the applicant's transport consultant and the matter is still under discussion with further information to be provided. Clarification has been provided that cable drum vehicles will enter each site access and not unload	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			within the highway. The revised OCTMP is still undergoing full review by WNC LHA. *Greater clarification has been provided on the number and type of vehicle movements associated with cable drum deliveries, and other traffic associated with the cable route corridor, in document in OCTMP Revision B [1EX3/GH7.9_B]. This is shown to have a minimal impact on the network for which WNC are responsible.* *Matter still to be resolved. Document EX3/GH6.3.13.2_A – Environmental Statement Appendix 13.2: Transport Assessment, Revision A (Part 3 of 3), submitted at Deadline 3 has all links to access routes blanked out. This does not allow for full review and query regarding access to Cable Route Access 16 cannot be resolved without this information being available.* ***See response to access queries above. Matter resolved.***	
WNC-017	Traffic and Transport	Outline Construction Traffic Management Plan (OCTMP): Road Condition Surveys	WNC notes that road condition surveys will be secured by Requirement 15 of Schedule 2 to the Draft DCO Revision A [REP1-008]. This matter is resolved. ***Matter resolved.***	
WNC-018	Traffic and Transport	Outline Operational Traffic Management Plan	The applicant has provided clarification on which access points are to be retained for the operational phase of the development. It is acknowledged that use of these access points will be limited following	

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			construction, similar to, or less than existing use as agricultural accesses. This matter is resolved. ***Matter resolved.***	
WNC-019	Traffic and Transport	Glint and Glare	Following a request by WNC, the applicant has undertaken an assessment of roads directly adjacent to solar array sites within WNC's boundary that were originally deemed outside of the scope of assessment due to them being minor roads with low traffic volumes. This has been presented in Glint and Glare Technical Note [EX2/GH8.2.4] submitted at Deadline 2. WNC are content that the matter has been robustly assessed, over and above industry standards, with results showing low impact for the roads added to the assessment and the matter can be concluded. ***Matter resolved.***	
WNC-020	Traffic and Transport	Public Rights of Way (PRoW) and Permissive Paths Management Plan	The applicant is engaging directly with WNC's Definitive Map Team to resolve the discrepancy with Public Footpath CW1 and it is expected a revised Public Rights of Way Plan at Deadline 3 to resolve this matter. *The applicant has engaged with the Council's Definitive Map Team to obtain the precise route of Public Footpath CW1 from the Definitive Map. Document EX3/GH2.6_C – Public Rights of Way Plan (Rev. C) has been submitted which includes the necessary amendment.* ***Matter resolved.***	

2.3 CPRE Northamptonshire

Table 2.3: [REP5-118]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
This document contains feedback to 8.1.28 The Applicant Responses to Written Representations at Deadline 3 [REP4-020]				
CPRE-002	Landscape and Visual Impact Socio-economics Human Health	Landscape mitigation	We must agree to disagree.	The Applicant notes this comment.
CPRE-003	Design	Operational Lifetime	It appears from this response that the Applicant does not understand that cumulative visual impact is not restricted to concurrent visibility but also includes sequential visibility as receptors travel through the landscape. When remembered views of solar infrastructure are repeatedly reinforced by new views this creates that the impression that the landscape is scattered with solar developments. The separation between elements of the scheme are insufficient for the elements to be absorbed within the landscape.	The LVIA **[APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses visual effects of the Scheme. This includes a detailed assessment of all visual receptors including all roads and PRoW within the 2km Study Area. The Applicant maintains that the Methodology applied for the LVIA , included within ES Appendix 8.1 **[EX6/GH6.3.8.1_B]** conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and robustly assesses cumulative visual effects. **Table 8.1.1.17: Types of Cumulative Visual Effects** within the LVIA Methodology **[EX6/GH6.3.8.1_B]** sets out the Methodological approach to Combined Visibility and Sequential Visibility. This can be seen born out within Appendix 8.3: ES

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				LVIA Assessment Sheets Revision A **[REP-041],** for example with the assessment of visual effects to users of the A509 London Road (TR014) which assesses Sequential Visibility between the sections of the array within Green Hill G and Green Hill F.
CPRE-004	Landscape and Visual Impact	Site composition	It is extremely unhelpful that the Applicant has not specified which responses in REP2-048 are pertinent. We see nothing that address the merits of concentrating undesirable industrial development into a one location. See the comment above regarding the dispersed nature of the scheme. We maintain that this scheme has a far wider adverse impact than a concentrated scheme and is in our view unacceptably harmful over a far greater area than the Tillbridge scheme.	The Applicant maintains its position that the large areas of land between each of the Sites help assist with assimilation of the arrays into the receiving landscape. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road infrastructure and the changing topography allowing the arrays to be distributed 'in and amongst' the landscape features.
CPRE-005	Energy Need and Policy	Need for solar Operational life	Government's first duty is to protect its citizens. In the case of climate change its first priority must be to ensure its to ensure that they are protected from its impacts. The potential reduction in emissions from this scheme are globally miniscule and would have no discernible impact on the rate of the impact of global climate change. If our efforts were being matched globally there might be an argument that the reduction in food security was justifiable	NPS EN-1 (2023) "considers the large-scale infrastructure which will be required to ensure the UK can provide a secure, reliable, and affordable supply of energy, while also meeting our decarbonisation targets" [NPS EN-1 (2023), Para 2.1.6], also [NPS EN-1 (2025), Para 2.1.1]. The Applicant's Statement of Need [APP-556] describes how the Scheme will contribute to meeting government's objectives of reducing carbon emissions,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			because it would reduce the climate change impact on food supplies thereby delivering greater food security. However, this is not the case and so it has to be decided whether further reducing our poor food security is outweighed by an insignificant reduction in global emissions. Given the potential to achieve solar targets within the built environment, we suggest that the reduction in food security outweighs the climate impact of this scheme. It is regrettable that the government no longer has a single department that is responsible for addressing climate change and that DENZ only considers net zero. Our view is that surviving the seemingly inevitable impacts of climate change is far more important than achieving net zero.	enhancing the security of energy supplies, and delivering affordable energy. This representation goes to the merits of the NPS, and to have regard to it would be directly in contradiction of NPS EN-1 (in particular paragraphs 3.2.6 - 3.2.8 that make clear that the need is established and that there is no requirement to consider the contribution of individual projects). The determination of the Applicant's DCO Application is not the means by which to challenge the provisions of the NPS, and it is for this reason that the ExA and SoS are able to disregard this representation and any others that relate to the merits of policy set out in a NPS, pursuant to sections 87, 94 and 106 of the Planning Act 2008 during the examination of the Application and when determining the Application. Agricultural resilience to climate change fundamentally depends on mitigation and decarbonisation efforts. This interdependence reflects a critical reality: the UK's long-term food security depends on stabilizing the global climate. The assessment's climate projections (Table 7.13) demonstrate why this distinction matters. By 2070–2099 under RCP8.5 (with no decarbonisation measures), summer precipitation could decline by 34.3 mm/day (−65.6 to +5.0%), meaning temperatures

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				could rise by 3.1°C, and cloud cover could decrease by 17.1%, alongside more extreme events like increased storms and heat waves. These shifts will most likely negatively impact UK agricultural productivity. Conversely, the Green Hill Scheme directly supports agricultural adaptation by reducing the warming trajectory itself, thereby protecting the stable climate conditions on which food production depends. Schemes like this aggregated across the UK and global energy sectors play an important role in decarbonising energy generation. The Scheme's true value lies in its contribution to climate stabilisation, which is the prerequisite for long-term agricultural resilience. The Scheme's real significance lies not in individual contribution metrics, but in its essential role within a global approach to decarbonisation that protects long-term food security through climate mitigation.
CPRE-006	Climate Change Energy Need	Limits of solar	See the above comment. We acknowledge that the scheme would deliver carbon reductions and is not an undeliverable scheme. Nevertheless this does not mean that its numerous harms are justified especially as there are alternatives that would meet targets.	The Applicant notes this comment. The NPSs establish a critical national priority for low carbon infrastructure, including for large-scale solar farms, because of the decarbonisation, energy security and affordability benefits that they deliver. NPS EN-1 explains that: "The urgent need for CNP Infrastructure to achieving our energy objectives, together with the national

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible" (Para 3.3.63). The environmental statement provides a robust assessment of the potential impacts of the Scheme and finds that there are limited significant adverse residual effects remaining after mitigation of which have been considered within the planning balance. The **Planning Statement [EX6/GH7.15_C]** recognises that whilst it has not been possible to avoid all impacts, these have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies secured through this DCO Application. The national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. In addition, critical national priority policy requires that residual impacts are outweighed by the urgent need. Therefore, it is considered that development consent for the Scheme should be granted. The Applicant considers that the site selection has been undertaken appropriately

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				as previously outlined in the Applicant responses to Stop Green Hill Solar **[REP4-021]**.
CPRE-007	Energy Need	Solar pipeline	The UCL report showed that the government 2050 target for solar can be met without the need for solar farms. The report acknowledges that it is likely that some solar farms would be required to meet the 2035 target because of the rate of require deployment. However, rooftop solar is being deployed at a higher rate than was anticipated which reduces the amount of ground mounted schemes that would be necessary to meet that target.	The Applicant supports the continued development of rooftop solar however as additional, rather than alternative, to large-scale schemes. This is consistent with government's view, and for the reasons given, in NPS EN-1 (2023) Para 3.3.12. Government's UK Solar Roadmap, (June 2025) sets out how, alongside ground mount projects, the government plans to drive forward deployment of solar across multifunctional uses of space including rooftops. Large-scale and smaller-scale schemes, together, are needed to meet government's energy targets. Section 3.9 of the Applicant's **Statement of Need [APP-556]** summarises the government's Clean Power 2030 Action Plan which includes ambitious capacity ranges for large scale solar of 45 to 47 GW by 2030 and 45 to 69 GW by 2035. Delivering these ranges, which is critical to the achievement of a clean power system on the way to net zero 2050, does not include rooftop schemes, therefore both large-scale and small-scale schemes are needed. Section 7.3 and Figure 15 of the **Statement of Need [APP-556]** show that not only do

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				large-scale schemes contribute to the national need for power to be transmitted to wherever it is needed (therefore supporting electricity system security), but also large-scale schemes are more affordable than small scale schemes.
CPRE-009	Principle of Development	Generation	It has now been acknowledged that renewables alone cannot deliver a secure supply and that firm backup is required including gas. Applicant's assertion that "The Scheme is a large scheme which over the course of one year will generate an amount of electricity which is equivalent to the annual energy consumption of approximately 115,000 homes" is completely false. The scheme would be capable of generating the amount of ELECTRICITY that is CURRENTLY consumed throughout the year by 115,000 average homes. It would not produce the electricity to match the seasonal demands of those homes.	The Applicant is proposing BESS as associated development to the Scheme to support the operation of the solar panels, including by storing electricity generated by the panels when it is not immediately needed, and sending it to the grid when need is greater – and thus balancing supply with demand, including from domestic properties. The deployment of large-scale renewable generation schemes and storage schemes will reduce the amount of firm backup that is required, including from gas generation, thus aiding the UK's carbon reduction commitments. The Applicant confirms that the Scheme would be capable of generating, over a year, an amount of electricity which is equivalent to the annual electricity consumption of approximately 115,000 homes.
CPRE-010	Principle of Development	Generation	We do not deny that the battery storage would be able to store excess generation capacity for long periods. However this is misleading because in practice it would only be expected to provide output for	The Applicant wishes to clarify the two different timescales referenced in this representation. Once BESS technology is charged, it is able to store that energy without leakage, for long

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			between ½ to 4 hours. It would certainly not last overnight.	periods of time (Para 6.11.69, **Statement of Need [APP-556]**). This is different to the maximum duration of full-power discharge from a fully charged BESS until it is fully depleted. (described at Para 6.11.59 - 6.11.65, **Statement of Need [APP-556]**). The Applicant assessed a 4-hr battery as part of its application, i.e. one which would be able to discharge from full-to-empty at 500MW for 4 hours, excluding the effects of losses)
CPRE-011	Agricultural Land Ecology and Biodiversity	Loss of food production land	Sheep grazing in solar farms is the exception and not the rule and so under the Rochdale envelope it must be assumed that it would not take place. The 0.027% figure is current and is based upon government data on the UK's total ENERGY consumption. See above regarding the incorrect claim regarding 115,000 homes	The Defra statistical publication Agricultural Land Use and Crop Areas in England at 1 June, published 25 November 2025, records the areas of solar panels on farms used for grazing or agricultural production as 4,937ha and the areas not used for agricultural production as 4,563ha. This statistic is for land that is part of an agricultural holding, and so does not cover all solar areas. This analysis shows that over half of those solar panel areas are grazed or used for production. Grazing is feasible and common. In order to ensure the worst case has been assessed, the Environmental Statement assumes that mowing will be utilised and the option of grazing is noted as one of the agricultural activities that may continue but other activities are also suggested such as

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				vegetation management. Therefore no reliance is put on sheep grazing.
CPRE-012	Agriculture and Soils	Reduction in food security	See above regarding the balance between food security and carbon reductions.	Please see the Applicant's response to SGHS-027 with regard to food security. With regard to carbon reduction, improved soil structure and soil organic matter sequester more carbon.
CPRE-013	Agriculture and Soils Energy Need	Cumulative impacts on arable land use	The important statistics are proportions of BMV and arable land which we presented. We are not surprised that the Applicant prefers to use this selective statistic. We note that the Applicant acknowledges that the land take for this scheme exceeds the normal amount anticipated.	The Applicant notes this comment, please refer to the response to CPRE-043 below in regard to Scheme size.
CPRE-014	Socio-economics, Tourism and Recreation	Impacts on Recreational Routes	We maintain our view.	The Applicant notes this comment.
CPRE-015	Agriculture and Soils	Potential Release of Sequestered Carbon and loss of biodiversity	The length of the delay in publishing that consultation responses usually indicates that they were not favourable. We consider that no weight can be given to the document. We do not accept that replacement cereal can be produced without bringing replacement land into production unless it is imported.	The Defra statistical publication Agricultural Land Use and Crop Areas in England at 1 June, published 25 November 2025, records 576,000ha of arable land as uncropped. Of this 443,792ha is recorded as arable land use for environmental benefit but not in production. Across England there are large areas of land that can be used for cereal production.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-016	Landscape and Visual Impact	Consultation	CPRE were not invited.	The Applicant confirms that efforts have been made to ensure the local community was notified of the statutory consultation and how to take part through advertisements and newsletters to properties within 2km of the Scheme site boundaries. The approach to consultation at pre-application included a two-stage engagement and consultation programme comprising in-person early engagement workshops, consultation exhibitions and updates to LPAs and parish councils. Further details on the pre-application consultation can be found in the Consultation Report **[REP1-017],** The Applicant confirmed it received a response from CPRE Northamptonshire to the statutory consultation on 19 December 2024. The Applicant's response to matters raised by CPRE are set out in the **Consultation Report Appendix: Statutory Consultation Section 42 and Section 44 Applicant's Response [APP-031].**
CPRE-017	Landscape and Visual Impact	Process and Methodology	We note that the Applicant acknowledges that their methodologies differ from those used by the Applicant at Tillbridge and they do not challenge our assertion that the differences favour their scheme.	The LVIA **[APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The Methodology for the LVIA has been progressed and agreed with the Local Planning Authorities. GLVIA3 is not prescriptive, only providing guidelines for the approach to Landscape and Visual Impact Assessment (LVIA). This allows for some degree of professional differences in approach to LVIA to be incorporated into methodologies for LVIA, however the core approach and principles of any LVIA must align with GLVIA3. The Applicant maintains that the Methodology applied for the LVIA , included within ES Appendix 8.1 **[EX6/GH6.3.8.1_B]** conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3).
CPRE-018	Landscape and Visual Impact	Representative Viewpoints	This does not answer our point	The Applicant notes this comment.
CPRE-019	Landscape and Visual Impact	Limited Visual Modelling	This does not address the lack of a mature winter impact or that the worst case is when the panels are not viewed face on.	The Applicant maintains its position that the worst case scenario is considered to be Year 1 Winter. At this point the proposed landscape mitigation planting would have just been planted and therefore at its smallest (in height, girth, canopy spread etc..). Additionally at this point the proposed changes to hedgerow management as set out within the OLEMP would yet to have allowed the hedgerows to have reached their target heights of between 4 – 4.5m. Winter months are also the moment of the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				year where the landscape is at its most open allowing greater visibility across the countryside.
CPRE-020	Landscape and Visual Impact	The Weight Given to Screening	No comment provided in the representation.	The Applicant refers to the response to 'CPRE-020' in **The Applicants Response to Written Representations at Deadline 3 [REP4-020].**
CPRE-021	Landscape and Visual Impact	The Weight Given to Local Receptors	As stated elsewhere, the Applicant does not seem to understand that it is not necessary to experience concurrent visibility for there to be a cumulative sequential impact.	The LVIA **[APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses visual effects of the Scheme. This includes a detailed assessment of all visual receptors including all roads and PRoW within the 2km Study Area. The Applicant maintains that the Methodology applied for the LVIA , included within ES Appendix 8.1 **[EX6/GH6.3.8.1_B]** conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and robustly assesses cumulative visual effects. **Table 8.1.1.17: Types of Cumulative Visual Effects** within the LVIA Methodology **[APP078]** sets out the Methodological approach to Combined Visibility and Sequential Visibility. This can be seen born out within Appendix 8.3: ES LVIA Assessment Sheets Revision A **[REP-041],** for example with the assessment of visual effects to users of the A509 London Road (TR014) which assesses Sequential

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Visibility between the sections of the array within Green Hill G and Green Hill F.
CPRE-022	Landscape and Visual Impact	Avoiding Local Vegetation	Micro-siting refers to small changes in the position of the camera at the viewpoint, not using a different viewpoint.	The Applicant notes this comment.
CPRE-023	Landscape and Visual Impact	Showing Information in Context	No comment provided in the representation.	The Applicant refers to the response to 'CPRE-023' in **The Applicants Response to Written Representations at Deadline 3 [REP4-020].**
CPRE-024	Landscape and Visual Impact	Restricted Study Areas	We maintain our view	The Applicant refers to the response to 'CPRE-024' in **The Applicants Response to Written Representations at Deadline 3 [REP4-020].**
CPRE-025	Landscape and Visual Impact	Sequential Cumulative Impact on local roads	We maintain our view	The Applicant refers to the response to 'CPRE-025' in **The Applicants Response to Written Representations at Deadline 3 [REP4-020].**
CPRE-026	Landscape and Visual Impact	Sequential Cumulative Impact on A509 between Olney and Wellingborough	This assessment covers an inadequate journey because the study area is inadequate.	A detailed LVIA methodology (ES Appendix 8.1 **[EX6/GH6.3.8.1_B])**, that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) has been has been progressed and agreed with the Local Planning Authorities. This includes the Study Area.
CPRE-027	Landscape and Visual Impact	Sequential Cumulative Impact	We maintain our view	The Applicant refers to the response to 'CPRE-027' in **The Applicants Response to Written Representations at Deadline 3 [REP4-020].**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-028	Landscape and Visual Impact	Sequential Cumulative Impact	We maintain our view	The Applicant refers to the response to 'CPRE-028' in **The Applicants Response to Written Representations at Deadline 3 [REP4-020].**
CPRE-029	Ecology and Biodiversity	Impacts on wildlife	No further comment	The Applicant notes this comment.
CPRE-030	Cultural Heritage	Conservation character of villages	We do not accept that the separation is sufficient to address the harm to the setting of the settlements.	The Scheme design has been established to reduce /remove impacts to the Mears Ashby, Grendon and Easton Maudit Conservation Areas. Attention has been given to the kinetic experience of heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). The visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in particular, along PROW with historical associations / views between heritage assets. Solar panels have either been removed (i.e. Fields EF9, EF16, EF34, FF8, FF9, FF13, FF14, FF16 and FF22) or offset (Fields EF5, EF10 to EF15, EF17, EF23 and EF33, FF11, FF15, FF18, FF19 and FF26) away from Conversation Areas, and enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Areas.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Extensive consultation has been undertaken with Historic England and the Local Planning Authority Conservation Officers (see **ES Appendix 12.8 Consultation Tables [App-148].** The Applicant notes that it has now been agreed with Historic England that setting issues appropriately mitigated for all heritage assets (see SOCG with Historic England [**EX6/GH8.3.4_A**]). All Local Planning Authorities agree with the assessment of heritage assets, please see West Northamptonshire Planning Authority [**REP5-100**], North Northamptonshire Planning Authority [**REP5-098**] and Milton Keynes Planning Authority [**REP5-102**]).
CPRE-031	Transport and Access	Transport Assessment at Link 80 & 81	This misses the point that nonmotorized users can only guarantee the safe use of these routes by avoiding them during working hours.	An assessment of the transport effects on non-motorised users is presented in Environmental Statement Chapter 13 - Transport and Access (Revision A) [**REP2-004**]. Link 81 is considered to have high sensitivity and the quantum of forecast construction traffic is low compared to existing movements of both total vehicles and HGVs. The effects are therefore non significant.
CPRE-032	Noise and Vibration	Noise monitoring	The Applicant is suggesting that we should accept their word having omitted to submit the evidence. This is not acceptable.	Please refer to the ES Chapter 14 Noise and Vibration **[APP-051]** and ES Addendum Chapter 14 **[REP1- 168]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CPRE-033	Noise and Vibration	Noise monitoring	The ground conditions in summer and winter can be hard and so this does not conform to the requirements to model the worst case.	The Applicant notes this comment and remains confident with the responses provided so far and the modelling was undertaken in accordance with ISO 9613-2 noise propagation methodology.
CPRE-034	Glint and Glare	PEIR assessment	Our concerns are not addressed by this response.	The Applicant acknowledges this comment. In the absence of UK legislation and standard methodology for assessing glint and glare impacts, the Applicant believes it is reasonable that British Horse Society guidance has been followed.
CPRE-035	Glint and Glare	PEIR assessment	See comment above regarding the BHS comment.	Please refer to response to comment CPRE-034.
CPRE-036	Air Quality	BESS Toxic Fumes	This response is not reassuring because it relies upon the "rapid dispersion of toxic gasses in outdoor BESS fires" which would not occur in all weather conditions such as during a temperature inversion. The reassurance based on offsite risks at other fires cannot be relied upon because those sites may be further from residences than the Green Hill site. The Emergency Response Plan must specify how the availability of tankers that would be required for the removal of polluted water can be guaranteed before the storage capacity is exceeded.	The Applicant acknowledges that temperature inversions can significantly reduce pollutant dispersion, causing emissions to remain concentrated near the ground. The BESS fire emissions modelling (**ES Appendix 16.2 [APP 167]**) specifically addresses this by using five years of local meteorological data, which includes periods of atmospheric stability, such as temperature inversions, when dispersion is poorest. The highest predicted concentrations from all meteorological scenarios for each receptor are reported, ensuring that the results reflect the worst-case conditions, including when a temperature inversion is present. Therefore, the concentrations reported in Table 9 of **ES Appendix 16.2: BESS Fire Emissions**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Modelling [APP-167] represent the maximum levels that could occur if a fire were to coincide with an inversion. Worst case receptor locations, which include residences closest to the Green Hill BESS site, have been modelled, as set out in **Appendix 16.2 BESS Fire Emissions Modelling [APP-167].** Section 5.5.9 of the Outline Battery Storage Safety Management Plan Revision B (OBSSMP) **[REP5-075]** stipulates: *The BESS Fire Emissions Modelling concludes that there are no significant impacts on sensitive receptors. Nonetheless, at the detailed design stage the Applicant will commission a BESS system and site specific Plume Analysis study to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The Emergency Response Plan (ERP) produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				and actions based upon thermal runaway test data supplied by the BESS system provider. *Section 6.1.1 of the OBSSMP* stipulates*: The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.* The Applicant has been working with the Environment Agency to fully agree firefighting water drainage system requirements, these are covered in Sections 5.5.5 - 5.5.7 of the OBSSMP. The Environment Agency is a Statutory Consultee for the Scheme and Section 7.1.4 of the OBSSMP stipulates: *The implementation of the OBSSMP is secured through a Requirement in Schedule 2 of the DCO. This will stipulate that a detailed Battery Safety Management Plan will be submitted to and approved in consultation with NFRS, the Environment Agency (EA), and by the relevant planning authorities prior to the commencement of*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				the works for the BESS. This plan will be substantially in accordance with the OBSSMP.
CPRE-037	Socio-Economics, Tourism and Recreation	Economic Effect of the changes to of PROWs	We are pleased that this acknowledges the impact.	The Applicant notes this comment.
CPRE-038	Socio-Economics, Tourism and Recreation	Effect on employment	We are please that this acknowledges the loss of local employment that would result from the scheme.	The Applicant notes this comment.
CPRE-039	Socio-Economics, Tourism and Recreation	Effect on employment	The scheme would cause a significant loss of business or even closure of other businesses without compensation. It is unacceptable that the businesses would not be compensated. Equestrian business are particularly at risk.	The assessment in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and supporting **Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]** identify no significant adverse effects to equestrian facilities at any phase of the Scheme. That notwithstanding, any employment losses in tourism and recreation-dependent sectors would be eligible to be supported by the measures set out in the **Outline Skill Supply Chain and Employment PlanS [APP-552]**, as secured by Requirement 20 in Schedule 2 to the **Draft DCO Revision E [EX6/GH3.1_E]**, which seeks to support rural enterprise through skills uplifting and diversification, focusing on local recruitment, and through providing retraining

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				opportunities for workers in tourism or recreation-dependent industries.
CPRE-040	Socio-Economics, Tourism and Recreation	Economic Effect on Local Economy	Our comment stands. Our comment is that the OSOCEP does not make specific commitments.	The measures set out in the **OSSCEP [APP-552]** are secured by Requirement 20 in Schedule 2 to the **Draft DCO Revision E [EX6/GH3.1_E]**, which legally requires a full Skills, Supply Chain and Employment Plan substantially in accordance with the outline version to be approved by the local planning authorities prior to commencement of construction.
CPRE-041	Human Health	Mental Health and Wellbeing	We maintain our position.	The Applicant notes this comment.
CPRE-042	Human Health	Being Active in the Open Countryside	We maintain our position.	The Applicant notes this comment.
CPRE-043	Agriculture and Soils	Wasteful Use of Agricultural Land	We note that this acknowledges that the land take exceeds the maximum anticipated in NPS EN-3.	It is noted in paragraph 2.10.17 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) that land requirements for solar farms "*will vary significantly depending on the site, with some being larger and some being smaller*", acknowledging that each scheme will differ depending on site-specific considerations. The figures provided in paragraph 2.10.17 are therefore indicative rather than prescriptive. Based on EN-3, the land required for a 500 MW scheme would typically fall within the range of approximately 800 to 1,200 hectares. In this context, the proposed Site

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				area of approximately 1,200 hectares is considered justified, having regard to the land required to deliver the agreed generating capacity of the Scheme, together with the provision of ecological mitigation, landscaping, and other environmental enhancements. It is also acknowledged that the Scheme includes a battery energy storage system (BESS).
CPRE-044	Agriculture and Soils	Continuing Agricultural Use	We welcome the acceptance that mowing should be assumed as the worst case.	The Applicant notes this comment.
CPRE-045	Agriculture and Soils	Effect on Soil Condition	Our observation of construction of solar farms mean that we have to agree to disagree.	The Applicant noted this comment.
CPRE-046	Major Accidents and Disasters	Major BESS Accidents	We acknowledge that there are other factors that might influence the likelihood of fire but it is undeniable that the number of units is a significant factor.	As stipulated in Section 6.1.3 of the OBSMP [**REP5-075**]: *As stipulated in NFPA 855 (2026) (Ref 3), a Failure Modes and Effects Analysis (FMEA) of the BESS (BS EN IEC 60812 (Ref 37)) or Layer of Protection Analysis (LOPA) of the BESS will be conducted to lay the foundation for predictive maintenance requirements and complement the fault indicator capabilities of the BMS data analytics system. This key analysis minimises the probability of a BESS failure in relation to the specific BESS system and site design and analyses key mitigation solutions to minimise the impact of a BESS failure in the unlikely event that this would occur. These types of risk analysis provide confidence to demonstrate*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				that under day-today operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low. The Applicant has absolute confidence that the pre-construction requirements documented in Section 6 of the OBSSMP minimises the likelihood of a BESS failure and fully mitigates a failure event should a failure occur i.e. fire propagation will not occur and toxic emissions or pollution concerns will not have significant off-site impacts.
CPRE-047	Major Accidents and Disasters	Toxic Fumes	We welcome this clarification.	The Applicant notes this comment.
CPRE-048	Major Accidents and Disasters	Firefighting Water Management	This does not address the concern that it is not intended to calculate the volume of water required at a later date.	Northamptonshire Fire and Rescue Service (NFRS) who are a statutory consultee for the **OBSSMP [REP5-075]** are satisfied with the Applicant's Firefighting provisions documented in Section 5. A provisional supply of 4 hours is agreed with the final volume decided at detailed design based up Large Scale Fire Testing and a range of rigorous risk assessments and consequence

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				modelling stipulated in Section 6 of the OBSSMP. This is confirmed in the Statement of Common Ground with Northamptonshire Fire and Rescue Service **[REP2-063]**.
CPRE-049	Major Accidents and Disasters	Emergency Response Plan	We are not reassured that the impact at Pastures Farm is acceptable.	The Applicant notes this comment and maintains the previous responses (CPRE-036 and CPRE-049) outlined in **The Applicants Response to Written Representations at Deadline 3 [REP4-020].**
CPRE-052	Community Benefits	Community Fund	It is essential to ensure that the Community Benefit Fund cannot be detached from the DCO.	The Applicant notes this comment and refers back to the position outlined in the Applicant response to 'NNC-085' in **The Applicant's Response to the Relevant Representations [REP1 161]** and response to 'NNC-002' in **The Applicant's Comments on Responses to ExA Second Written Questions [EX4/GH8.1.27].**
CPRE-053	General Matters	Guaranteeing Decommissioning and Repowering Funding	It is essential to ensure that the funding for decommissioning is guaranteed.	The Applicant notes this comment, as outlined in the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses **[REP3-129]**, Requirement 21 of Schedule 2 to the draft DCO Revision E **[EX6/GH3.1_E]** requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				approved plan. Failure to comply with this requirement is a criminal offence. The Applicant has agreed leases with the Site landowners, which include a requirement to provide security for the benefit of the landowner to cover any circumstance where there is a failure to decommission the Scheme. The Applicant notes that there is no policy requirement for a decommissioning fund to be imposed and paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments. The Applicant considers that Requirement 21 complies with paragraphs 2.10.146 to 2.10.148 of NPS EN-3. The Secretary of State has considered this point in previous decisions for solar projects under the Planning Act 2008 and determined that imposing a decommissioning fund requirement is not necessary. This is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed.

2.4 Bozeat Parish Council

Table 2.4: [REP5-114]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
This document contains the Bozeat Parish Council reactions to the responses submitted by the Applicant in their document [REP4-022]				
BPC-001	Transport and Access	Response to WR **[REP2-048]** BPC-002	This response only explains why the applicant wants to use this route and not why they cannot use the less convenient route via Access F3 and the internal track. From the response given we would understand if there was an exceptional delivery that might require this route, but there is no reason given for this to be a route for wider use. Since the applicant is determined not to justify why this route is essential, please can the ExA seek a justification on our behalf? If there is no clear answer, we request that this route is removed from the scheme.	The requirement for use of this access is for operational and construction purposes associated with solar array infrastructure and the construction of the cable route corridor. The access is included to ensure there is flexibility in the construction programme to enable access to the Site to be maintained whilst other activities are taking place. Site F is a large site consisting of three main areas, with the northern section accessed from Access F-1 from the A509. The middle section is accessed from Access F-2, and the southern section is accessed from Access F-3. The northern part of Site F is distinct from the middle and southern sections. Connectivity between the middle and southern areas is available at the southern point of Horn Wood only. Were HGV access restricted to Access F-3 only, this location would significantly restrict movement within the Site as all vehicles would be required to travel through this single length of track. Additionally, vehicles would be required to travel north through fields FF28 and FF27 to construct solar panel areas next to Access F-2. Fields FF27 and FF28 are designated as ground nesting bird mitigation habitat and also have significant archaeological value including an iron age and Roman settlement. For these reasons, it

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				is considered appropriate to include Access F-2 within the Scheme to provide flexibility in how Green Hill F is constructed and reduce potential environmental effects on archaeological assets and ecological mitigation land during construction. The assessment of the access is included in **Environmental Statement Chapter 13 - Transport and Access (Revision A) [REP2-003]** to ensure any effects arising from the development have been considered and to enable its use. Access F-2 would be accessed using Link 81 (London Road, Bozeat). This road has been assessed as High Sensitivity. As set out in Transport and Access Technical Note [REP2-055]a peak of 11 HGVs is expected to use Link 81 to access Green Hill F at Access F-2 and/or the cable route corridor at Access CR23. The assessment identifies Minor Adverse (not significant) effects on the severance, amenity, delay and fear and intimidation of non-motorised road users. The assessment confirms that the highway network can accommodate the anticipated peak levels of construction traffic to these accesses without a significant effect. It is therefore considered appropriate to utilise the existing farm access of Access F-2 to provide greater flexibility for the construction of the Scheme without leading to any significant adverse effects.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BPC-002	Landscape and Visual Impact	Response to WR **[REP2-048]** BPC-003	We are pleased that the applicant acknowledges that there would be Significant Adverse landscape impacts and that the mitigation would not fully screen the scheme. We consider that the applicant's assessment of the landscape impact overstates the effectiveness of screening. Nevertheless, it acknowledges that receptors travelling through the landscape would experience views of the scheme which would create an impression that they were travelling through a landscape dominated by solar infrastructure. We consider that the cumulative impact of this would result in a Significant Adverse change to the character of the landscape.	The landscape mitigation does not attempt to provide zero visibility of the proposals. Mitigation measures proposed have been identified to minimise adverse visual effects complying with NPS EN-3 by *"minimising the landscape and visual impact"* of the Development. NPS EN-1 recognises at para 5.10.13 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."*
BPC-003	Landscape and Visual Impact	Response to WR **[REP2-048]** BPC-004	This response does not answer the question about how the OLEMP would be monitored and financed. It is essential that, if made, the DCO contains a requirement that the operator funds both the monitoring and management of the OLEMP.	The Outline Landscape and Ecological Management Plan (OLEMP) **[EX6/GH7.4_E]** sets out a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme. The OLEMP concerns works which will be required during both the construction and operational phases of the Scheme. The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the Draft DCO Revision E **[EX6/GH7.4_E]** and is therefore a legally binding obligation.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				This Requirement would ensure that a detailed Landscape and Ecological Management Plan is submitted to and approved by the relevant planning authority prior to the commencement of works. The implementation, monitoring, and ongoing management of the approved measures would be the responsibility of the appointed contractor and the relevant planning authority.
BPC-004	Socio-economics, Tourism and Recreation	Response to WR **[REP2-048]** BPC-005	This does not change our view that there would be a Significant Adverse impact on recreational users of the PROWs and country roads.	The Applicant notes this comment and maintains the response provided to BPC-005 of The Applicant's Responses to Written Representations at Deadline 1 [**REP2-048].**
BPC-005	BESS Air Quality	Response to WR **[REP2-048]** BPC-006	This response is not reassuring because it relies upon the "rapid dispersion of toxic gasses in outdoor BESS fires" which would not occur in all weather conditions such as during a temperature inversion. The reassurance based on off-site risks at other fires cannot be relied upon because those sites may be further from residences than the Green Hill site. The Emergency Response Plan must specify how the availability of tankers that would be required for the removal of polluted water can be guaranteed before the storage capacity is exceeded.	The Applicant acknowledges that temperature inversions can significantly reduce pollutant dispersion, causing emissions to remain concentrated near the ground. The BESS fire emissions modelling (**ES Appendix 16.2 [APP 167]**) specifically addresses this by using five years of local meteorological data, which includes periods of atmospheric stability, such as temperature inversions, when dispersion is poorest. The highest predicted concentrations from all meteorological scenarios for each receptor are reported, ensuring that the results reflect the worst-case conditions, including when a temperature inversion is present. Therefore, the concentrations reported in Table 9 of **ES Appendix 16.2: BESS Fire Emissions**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Modelling [APP-167] represent the maximum levels that could occur if a fire were to coincide with an inversion. Worst case receptor locations, which include residences closest to the Green Hill BESS site, have been modelled, as set out in **Appendix 16.2 BESS Fire Emissions Modelling [APP-167].** Section 5.5.9 of the Outline Battery Storage Safety Management Plan Revision B (OBSSMP) **[REP5-075]** stipulates: *The BESS Fire Emissions Modelling concludes that there are no significant impacts on sensitive receptors. Nonetheless, at the detailed design stage the Applicant will commission a BESS system and site specific Plume Analysis study to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The Emergency Response Plan (ERP) produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Section 6.1.1 of the OBSSMP stipulates*: The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed LSFT to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.*
BPC-006	Ecology and Biodiversity	Response to WR **[REP2-048]** BPC-007	If deer are able to penetrate the fencing, then it is important that the OLEMP includes provision for replacing planting that is damaged by deer.	The OLEMP **[EX6/GH7.4_E]** includes annual inspections to monitor the success of planting during the establishment phase (Years 1-5 of the Scheme), with replacement planting like-for-like for Years 1-5. Thereafter, replacement planting will be required for any significant failures, identified through ecological monitoring. Please refer to paragraph 4.2.12 and Appendix A - Outline Management Prescription Timetable.
BPC-008	Transport and Access	Response to WR **[REP2-048]** BPC-009	The commitment is not clear as it enables the developer to dispute repairs. The routes used will be used by other traffic and there is potential for the developer to argue that other traffic is partly responsible for the damage. The Earls Barton bends are a case where the cost of repairs have fallen on council tax payers even though the heavy traffic from the quarry are the primary cause of the damage.	The requirement to undertake road condition surveys and correct defects attribution to the Scheme is set out in section 5.3 of the **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C]**. This confirms that all stages will need to be agreed and the approach approved by the highway authorities.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BPC-009	Consultation	Response to WR **[REP2-048]** BPC-010	This is a disappointing response. This is a clear case where traffic management needs to be constrained and the Highways may miss it.	The **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C]** outlines the mechanisms for agreeing access design and traffic management as necessary with the highway authority. The highway authority must be consulted as part of any access changes or traffic management proposed.
BPC-009	Consultation	Response to WR **[REP2-048]** BPC-010	The proportion of applicant responses that do not offer any change demonstrates our case.	The Applicant notes this comment.
BPC-010	General Matters Energy Need	Response to WR **[REP2-048]** BPC-011	It has been clear from the start that the Grendon substation is the reason for this proposal. However, there are other substations where similar schemes are, or could be, proposed and so the presence of a connection does not in itself override all other considerations. The applicant selectively quotes from Government guidance where it supports their case but conveniently omits the areas of Government guidance that are not met by the scheme.	There is no prescribed methodology in national planning policy or guidance for site selection in relation to solar developments. NPS EN-3 Paragraph 2.3.9 recognises that "*most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN 1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments*)". As outlined in the Applicants response to SGHS-001 to SGHS-006 in the **Applicants Response to Stop Green Hill Solar [REP4-021]** the provision of a grid connection offer is

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				fundamental when considering the viability of the scheme as the provision of a grid connection is dependent on the ability to export the electricity generated. As the grid connection offer specifies Grendon Substation as the Point of Connection, the Applicant proceeded to look at sites that could accommodate a solar project in proximity to this location.

2.5 Environment Agency

Table 2.5: [REP5-116]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
EA-001	General Matters	Statement of Common Ground	We are satisfied with the Applicant's continued engagement with us on matters within the Statement of Common Ground for this Development Consent Order (DCO). We provide our updated position on such matters in Appendix 1. We believe it is likely that all matters which remain under discussion can be resolved by the close of the Examination.	The Applicant notes this comment.
EA-002	Flood Risk	Flood Risk Activity Permits (FRAP)	We wish to confirm that the Applicant's request to disapply Flood Risk Activity Permits (FRAP) under the Environmental Permitting (England and Wales) Regulations 2016 has been deemed appropriate for the proposed development. For disapplication of FRAP to be acceptable, standard Protective Provisions in favour of the Environment Agency are required in the DCO, and the following conditions must also be met by the Applicant: • All Main River crossings must use Horizontal Directional Drilling (HDD) methodology. • The Wilby Flood Storage Area at NGR: SP8610865442 must be acknowledged in relevant documents, including the Crossings Register. • Details must be provided that the Applicant's works do not impact Environment Agency assets.	The Environment Agency's agreement to the disapplication of the requirement for separate Flood Risk Activity Permits is welcomed. The Environment Agency's standard form of protective provisions have been included in the **draft Development Consent Order (Revision E) [EX6/GH3.1]**. The **Crossing Schedule [EX6/GH7.18_B]** has been updated to include the Wilby Flood Storage Area. A commitment to undertake a pre-commencement survey and consultation with the Environment Agency on this crossing has also been included within the **Outline Construction Environmental Management Plan [EX6/ GH7.1_C]**. The Applicant is awaiting further information from the Environment Agency in regard to the Wilby Flood Storage Area.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			• Ideally, we do not want the cable under the control structure/ reservoir wall, we would also prefer if it was further upstream in the storage area, in the event we wished to do works to the reservoir embankment. The Applicant should take heed of this comment.	
EA-003	Development Consent Order	Protective Provisions	We do not consider it necessary or appropriate for the scheme to require any amendments to our standard Protective Provisions. Our standard Protective Provisions should be included in the DCO instead of any amended iterations.	The Applicant has included the Environment Agency standard set of protective provisions in the **draft DCO Revision E [EX6/GH3.1_E].**
EA-004	Flood Risk	Flood Risk Activity Permits (FRAP)	The Environment Agency's formal decision on the disapplication of FRAP, and the conditions set out above, have been provided to the Applicant in advance of Deadline 5. An update has also been included in the Applicant's draft Statement of Common Ground.	The Applicant notes this comment.

2.6 Mary Rogers

Table 2.6: [REP5-127]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
MR-001	Traffic and Transport	HGV movement	I must formally state that the information provided does not reflect what was previously portrayed to the Highways team. We were advised that this access would be used only by construction staff vehicles, not by HGVs. It was made clear that: The access would not be extended or upgraded It would not be suitable or viable for HGV use It would be used solely for light construction staff vehicles. The access point at CR23 is located on a national speed limit road and sits on a sharp bend along with Access-F-2, making it inherently unsafe for HGV movements. Introducing heavy goods vehicles at this location presents a serious risk to road users, residents, and construction staff. You will be aware of the serious accident that occurred at the A509 development, which highlights the very real dangers of unsuitable access arrangements on fast-moving roads. We are not prepared to see similar risks repeated here. The attached plan clearly shows the constrained nature of the access, and it is evident that this location is not appropriate for regular HGV movements. Given this discrepancy between what has now been stated and what was originally presented to Highways, I will be: Raising this matter directly with	Table 13.10 of Environmental Statement Chapter 13 - Transport and Access (Revision A) [REP2-003] identifies the access locations for the Scheme. This identifies CR23 as an improved existing field access, providing for the Cable Route Corridor. Drawing number 23061-KMC-XX-CR23-DR-CH-0001 revision C contained in **Environmental Statement Appendix 13.2 Transport Assessment Part 2 of 3 (Revision A) [REP3-039]** provides visibility detail from the access that is commensurate with recorded vehicles speeds. Should traffic management be considered necessary at any point during the construction period, this will need to be agreed with the highway authority as set out in the **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C].** Movements will likely fluctuate at times across the construction period as various tasks are undertaken. The **Transport and Access Technical Note [REP2-055]** provides an assessment of the peak movements expected at access CR23 considering 11 HGV arrivals as a maximum per day. The assessment identifies Minor Adverse (not significant) effects on the severance, amenity,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			the Highways Authority Requesting a formal site visit Seeking the involvement of all relevant council members Escalating this to Parliamentary level This is a matter of public safety, and it must be treated accordingly. I would appreciate written clarification on: Whether HGVs are now definitively proposed to use CR23 & Access-F-2? Why does this differ from what was previously presented to Highways? What safety assessments have been carried out specifically for these access points? The latest drawing of CR23 is attached to this email. We do not propose widening/ changing the access, but instead extend its use to provide flexibility for workers to access this area. The draft DCO might allow such changes, noting that this drawing is only indicative at this stage.	delay and fear and intimidation of non motorised road users. See response to BPC-001 for further clarification.
MR-001	Traffic and Transport	Traffic assessment	I remain concerned that several material issues directly affecting my property at [REDACTED] have not been addressed. In particular, your response does not make any reference to the proposed access point adjacent to my property, as well as the risks arising from construction traffic and vibration. 1. Access point adjacent to 80 Easton Lane Your response makes no mention of the construction and/or operational access point located immediately adjacent to 80 Easton Lane, despite this being a key concern raised in my correspondence. The proximity of this access point has significant implications for: Increased HGV movements directly beside my	Drawing number 23061-KMC-XX-CR23-DR-CH-0001 revision C contained in **Environmental Statement Appendix 13.2 Transport Assessment Part 2 of 3 (Revision A) [REP3-039]** provides visibility detail from the access that is commensurate with recorded vehicles speeds. The **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C]** outlines the mechanisms for agreeing access design and traffic management as necessary with the highway authority. This will be considered by the contractor as part of further design detail. Table 4.1 of the oCTMP confirms that the access is

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			property. Noise, vibration, dust and light disturbance. Ongoing safety and amenity impacts. Potential restrictions or delays to accessing my property. I require a clear explanation of: What is the intended use, duration, and intensity of this access point? Expected daily HGV numbers using this access? Will this access be temporary or permanent? How safe, uninterrupted access to my property will be guaranteed at all times? A general reference to the CEMP does not address the site-specific impacts of this access point. 2. Vibration impacts and risk of structural damage Your response does not address the risk of vibration from frequent HGV movements, particularly given the narrow, rural nature of Easton Lane and the close proximity of construction traffic to my property. I am concerned about: Potential damage to the foundations of my home. Damage to my driveway, boundary structures, and access surface. Long-term structural impacts that may not be immediately visible. Please confirm: Will vibration monitoring be undertaken at or near my property? What pre-condition surveys will be carried out to establish a baseline? What thresholds will trigger intervention or cessation of work? 3. Compensation and remediation for directly affected residents There is no information provided regarding compensation or remediation for residents who are directly affected by construction impacts. Please clarify: What compensation mechanisms are available to residents whose properties are adjacent	proposed for use during the construction of the cable route corridor only. As is the case for all nationally significant infrastructure projects, compensation under the compensation code for residents whose properties are adjacent to access points or construction routes, but where no compulsory acquisition powers are being sought over their land or rights, is only payable in exceptional circumstances and where the construction works can be demonstrated to have directly resulted in a diminution in value of the property. Structural damage to properties as a direct result of construction activities for Green Hill Solar Farm would be compensated in accordance with the DCO. However, we do not anticipate any damages to properties as a direct result of the construction activities as set out in **ES Chapter 14 Noise and Vibration [APP-051]** and **ES Addendum Chapter 14 Noise and Vibration [REP1-168]**. It should be noted that access CR23 is intended primarily for construction traffic and will be temporary for the duration of the construction phase only. While the **Outline Construction Environmental Management Plan [EX6/GH7.1_C]** provides overarching controls, it provides a good indication of the measures that would be taken to minimise risk of vibration impacts.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			to access points or construction routes? How will claims for structural damage, loss of amenity, or access disruption be handled? Whether a formal property damage or hardship scheme will be put in place? Who should residents contact should damage occur during construction? 4. Cumulative impact on residential amenity While noise impacts have been described as "not significant," this conclusion fails to account for the combined effect of noise, vibration, access disruption, traffic movements, and proximity of the access point on day-to-day living conditions at my property. These impacts must be assessed collectively, not in isolation. 5. Examination process I note your comments regarding the Examination stage; however, the issues raised above relate to information that should already be defined within the Scheme's proposals and assessments. Redirecting these concerns to the Planning Inspectorate without addressing them substantively does not provide the clarity required by affected residents. I would therefore request a property-specific response addressing: The access point adjacent to 80 Easton Lane? Anticipated HGV movements and vibration impacts? Monitoring, mitigation, and enforcement measures? Compensation and remediation arrangements?	Whilst vibration thresholds are not anticipated to exceed to the point where structural damage could be caused to the property, the detailed CEMP and CTMP will ensure that contact details for site manager are made available should anyone have any concerns. We recognise that the cumulative effects of noise, vibration, traffic, and access disruptions can impact day-to-day living. Our assessments consider these factors collectively, and mitigation measures are designed to minimise overall disturbance, as well as those in isolation.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Until these matters are transparently and adequately addressed, I do not consider my concerns to have been resolved.	

2.7 Lisa Rowlinson

Table 2.7: [REP5-128]

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LR-001	Glint and Glare	Assessment	The applicant has used multiple graphs they have found from weatherspark.com within North Northamptonshire Local Highways Glint and Glare [REP4-026]. They state they show predicted cloud cover. However, the website states the methodology for the data is as follows: 'For each hour between 08:00 and 21:00 of each day in the analysis period (1980 to 2016), independent scores are computed for perceived temperature, cloud cover, and total precipitation. Those scores are combined into a single hourly composite score, which is then aggregated into days, averaged over all the years in the analysis period, and smoothed.' so the statement by the applicant that the graphs show predicted cloud cover is completely misleading and incorrect. Please can the applicant reference the specific industry guidance and/ or best practice document where it shows they may omit receptors on upper floors of dwellings irrespective of a site's topology from assessments? Also, please can the applicant explain how the omission of upper floors of dwellings is compliant with EIA Regulations? The applicant stated in their Responses to Deadline 3 Submissions [REP4-022] receptors for glint and glare assessments have been included for other, approved, DCO Solar applications. However, this is irrelevant as glint and glare assessments must be site specific. Glint and glare assessments should be based on a site's unique layout and topography. Excluding relevant receptors based on assessments for other schemes is methodologically flawed and results in a materially incomplete Environmental Statement.	The Applicant notes the comment regarding the weatherspark.com methodology. The methodology described is only applicable to weatherspark.com's tourism score and beach/pool score, where the perceived temperature, cloud cover, and total precipitation is combined to give a final score to represent the ideal time to visit the area, or to visit a beach/pool in the area. This methodology is not applicable to the cloud cover charts used within the glint and glare assessments. The methodology used for predicted cloud cover is "based on a statistical analysis of historical hourly weather reports and model reconstructions from 1 January 1980 to 31 December 2016." In the absence of UK standard methodology for assessing residential receptors, PagerPower's 'Solar Photovoltaic and Building Development – Glint and Glare Guidance'(as ref.15.17 in **ES Chapter 15 Glint and Glare [APP-052]** has been referenced. The

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			In environmental decision making, an Environmental Statement is needed to identify, describe and assess the likely significant effects of a project. The decision maker can only lawfully weigh the benefits against the assessed harm. If the harm is not assessed, it is not part of the evidence so it cannot be weighed as part of the decision. The purpose of the legislation is to ensure environmental harm is not ignored or inadequately assessed.	guidance states that "*For dwellings, a recommended additional height of 1.8 metres above ground level should be added to account for eye level on the ground floor, with additional floors being assessed as required. Additional heights should be considered where a receptor is higher than a first floor. Modelling is recommended for ground floor receptors because it is typically the most occupied during daylight hours"*. Additional floors would be considered where the main living space is located on higher floors i.e. in a block of flats which is not the case for properties in the vicinity of the Scheme. The Applicant notes the comment on Environmental Statements.
LR-002	Noise and Vibration	Sloping topology	The applicant states in their Response to Deadline 3 Submissions [REP4-022] 'Results of the first and second floor levels have been considered'. However, 'second floor' is not mentioned once within Environmental Statement Chapter 14: Noise and Vibration [APP-051]. The 10dB reduction applied by the applicant to their results cannot be applied to the sound reduction across a partition of a second floor bedroom within the roof with a partially open window. The structure of rooms within the roof are fundamentally different from the conditions in Napier's research so that research cannot be applied to estimate sound across these partitions.	The methodology used is consistent with established acoustic principles and reflects industry-standard approaches to estimating sound reduction, including adjustments for partially open windows and typical building construction. While it is true that the structural conditions of rooms within the roof differ somewhat between individual properties, the application of

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Therefore, all of the predicted operational noise levels need at least 10dB adding back onto them to reflect realistic worst case scenarios. Second floor bedrooms are more exposed than first floor bedrooms so it is likely they will experience a greater noise level and their results will be higher than the applicants before they applied the 10dB reduction to them. Due to the sloping topology it is very unlikely that the closest dwelling is the most exposed to harm so the results are understated as dwellings slightly further back are at higher level than the receptors the applicant has chosen. As previously stated, Property A may be closer than Property B but Property A may be shielded by terrain, vegetation or buildings and experience less of an impact. Site specific analysis is needed to determine if the closest property is the most exposed to harm or whether others in the vicinity may be more significantly affected due to topography, elevation or other environmental factors.	Napier's research provides a reasonable basis for the reduction given the overall context and conservative nature of the assessment. Regarding the exposure of second floor bedrooms, the assessment has been carried out conservatively, and the predicted noise levels take into account the typical variability in receptor height and exposure. Night-time modelling results are taken from a height of 4-meters above ground, as stipulated in Para. 1.2.11 of the **ES Addendum Chapter 14 Noise and Vibration [REP1-168].** It should also be noted that the criteria used to inform the assessment includes bedrooms. This is set out in Table 14.10 'Method for Assessing the Magnitude of Impact' of the **ES Chapter 14 Noise and Vibration [APP-051].** With respect to the topography and receptor exposure, the modelling incorporates detailed site-specific data, including terrain, and typical screening. The identification of the closest dwelling as the most exposed receptor is supported by the acoustic modelling results, which

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				consider these environmental factors. We therefore believe that the current assessment provides a robust and reliable representation of the noise impact, and the conclusions drawn are appropriate.
LR-003	Noise and Vibration	Assessment Model	The applicant states in their Response to Deadline 3 Submissions [REP4-022] 'The model assumes windows will face the noise source, which provides a precautionary worst-case scenario irrespective of the actual orientation of windows or building layout'. This suggests that real world geometry is not represented within the model. The applicant states within Environmental Statement Chapter 14: Noise and Vibration [APP-051] 'Road traffic noise at existing and proposed receptors have been predicted using the CadnaA software, taking into account 1st order reflections from buildings and other large surfaces'. However, reflections and subsequent outputs of the model are not likely to be valid as they are not based on the real world geometry of the sites so the results are meaningless. This is further emphasised as the applicant states within Environmental Statement Chapter 14: Noise and Vibration [APP-051] 'The modelling software calculates noise levels based on the emission parameters and spatial settings that are entered.' However, the applicant has admitted they have not used real world spatial settings. As a result, the noise assessments do not reflect the real world impact the project will have and they are not reflective of a worst case scenario as other receptors are more exposed as mentioned above.	It is acknowledged that the model assumes windows face the noise source as a precautionary worst-case scenario, this approach is a widely accepted practice in acoustic assessments to ensure conservative estimates of noise exposure. It aims to capture potential maximum impacts irrespective of actual window orientation, which may vary across the site. Regarding the use of CadnaA software, the modelling incorporates first-order reflections and considers building and surface influences within the constraints of the available data. Although the model does not replicate every detail of real-world geometry, it uses spatial settings representative of the site based on the best available information. This balance between model complexity and practicality is

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				standard in environmental noise assessments. Furthermore, the modelling parameters and spatial settings entered align with standard practice and are intended to provide reliable predictions of noise levels, enabling effective mitigation design. The claim that these results are "meaningless" overlooks the inherent uncertainties in any modelling exercise and the conservative assumptions applied. While no model can perfectly replicate real-world conditions, the assessment methodology provides a robust and precautionary basis for understanding potential noise impacts. It is designed to ensure that receptors identified as at risk are appropriately considered and that mitigation measures are adequately scoped.
LR-004	Noise and Vibration	Predicted noise levels	Furthermore, the applicant states in their Response to Deadline 3 Submissions [REP4-022] 'Responses to Written Representations at Deadline 1 [REP2-050] remain valid given the assessment results predict that noise levels from the Scheme are predicted to be no higher than the representative background noise levels at the closest sensitive receptors during the daytime and night-time periods with the appropriate mitigation measures incorporated. The results were informed by manufacturers data and therefore	We note concerns raised about the consistency between the qualitative judgment on intermittency effects in Responses to Written Representations at Deadline 1 **[REP2-048]** and the more quantitative conclusions presented in Response to Deadline 3

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			considered to be of low risk of understated noise levels.' but in their Responses to Written Representations at Deadline 1 [REP2-048] they state 'any intermittency associated with the proposed operations is unlikely to be readily distinctive against the residual environment' which is a subjective judgement and not a numerical assessment. The applicant's more recent submission implies that the conclusions are based on quantitative evidence obtained by an assessment. This inconsistency is misleading and raises concerns about the reliability and transparency of the applicant's noise assessment. 'You should recognise that there can be significant uncertainty associated with the manufacturers' data' is found on the following website: https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/no ise-and-vibration-management-environmental-permits#step-3-source-assessment. The judgement to use manufacturers data as a substitute for an assessment is flawed and cannot be relied upon. As a result, penalties will need to be added onto predicted operational noise levels for the characteristics present. In conclusion, most, if not all, predicted noise levels will be above 35dB which is significant. The impact on pets has been omitted and the applicant has failed to rectify this omission despite repeated statements highlighting their omission. Pets are more sensitive than humans to noise and the characteristics so disregarding them represents a significant methodological gap. This is particularly concerning given the clear welfare implications and the applicant's duty under the EIA Regulations to assess all relevant receptors.	Submissions **[REP4-022]**. However, it is important to recognise that noise impact assessments often require a balanced interpretation of both quantitative data and qualitative observations to provide a comprehensive understanding of potential effects. The conclusions of our assessments are based on manufacturer data combined with modelling and site-specific considerations, which is consistent with accepted practices. Regarding the use of manufacturer data, manufacturers' specifications are a standard and widely accepted input source in noise assessments, particularly where direct measurements may not be feasible. The referenced guidance on the UK government website acknowledges uncertainties but does not preclude the use of manufacturer data when appropriately applied and supplemented by modelling and monitoring. The methodology reflects such standard practice, and any necessary conservatism is accounted for within the assessment framework.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				With respect to the predicted noise levels, our assessment indicates that with appropriate mitigation measures, noise levels are predicted to remain below relevant thresholds, including the 35dB internal level referenced. The assertion that most predicted noise levels will be above 35dB does not align with the findings presented, which have undergone peer review and regulatory scrutiny. On the matter of impacts on pets, while we acknowledge the sensitivity of animals to noise, current EIA regulations and guidance primarily focus on human receptors and designated ecological receptors. The scope appropriately aligns with statutory requirements. Consideration of impacts on pets, although important from a welfare perspective, falls outside the typical remit of statutory environmental noise assessments. We therefore consider the noise assessment to be methodologically sound, transparent, and compliant with relevant guidance and regulations.
LR-005	Flood Risk	Flood zones	On page 177 of their Responses to Written Representations at Deadline 1 [REP2-048] the applicant states the following: 'The	Flood risk at the Green Hill BESS site has been assessed in **ES**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			statement that the BESS lies within Flood Zones 2 and 3 is incorrect. The Environment Agency Flood Map for Planning is an indicative national screening tool and does not define site specific flood extents. For Green Hill, detailed hydraulic modelling has been completed for the Grendon Brook catchment, as set out in Flood Risk Assessment Annex J (Green Hill BESS) [REP1-057]. This modelling supersedes the national mapping and shows that the BESS compound is wholly within Flood Zone 1'. The applicant states in their Response to Deadline 3 Submissions [REP4-022] 'Arthian undertook additional hydraulic assessment to provide a site specific understanding of flood behaviour at the BESS site' but the assessment is highly likely to be inaccurate of flood behaviour as the model for main river interactions is only 1D and contains data from 1980s-2000s. The results also contradict the Environment Agency's classification. Arthian attempted to justify the 1D model by classing the site as a low vulnerability NSIP which is completely incorrect. The applicant states there will be mitigations and they have not solely relied on historic mapping but accurate assessments need to be undertaken to ensure mitigations are at the very least sufficient. Placing a BESS within Flood Zones 2 and 3 without proper assessment suggests the applicant does not understand the seriousness of the risks involved. Continuing on, there is still no mention of any measures or plan to deal with a flood causing a fire and hindering fire fighting efforts. A flood could result in previously identified measures and controls no longer being effective. For example, the applicant mentions pollution control measures (including automatically closing isolation valves in the event of a fire) within their Response to Deadline 3 Submissions [REP4-022] but what happens if a flood means the valves do not close? NFPA 855 (2026) requires	**Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C]** and **Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS [REP5-015]**. The Environment Agency Flood Map for Planning is a national scale screening dataset intended to provide a strategic indication of areas that may be at risk of flooding from main rivers. It is derived from broad scale modelling and is not intended to define site specific flood extents or development boundaries. For the Green Hill BESS site, a site specific hydraulic modelling exercise of the Grendon Brook catchment was undertaken as part of the Flood Risk Assessment to provide a refined understanding of flood behaviour in the vicinity of the site. This modelling incorporates detailed topographic survey data and available channel information and includes assessment of the 1% annual exceedance probability (AEP) event with an appropriate climate change allowance. While parts of the surrounding area fall within the indicative Environment

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Hazard Mitigation Analysis (HMA) to identify and mitigate all reasonably foreseeable external hazards for BESS installations. For example, a BESS located within a flood risk area should demonstrate that flooding cannot compromise electrical isolation, fire safety systems or emergency access. Without robust site specific flood modelling and mitigation the installation would not satisfy NFPA /855's minimum	Agency Flood Map for Planning flood extents, the results of the site specific modelling presented in **Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS [REP5-015]** demonstrate that the proposed BESS compound itself is located outside the modelled 1% AEP plus climate change flood extent and is therefore within Flood Zone 1 for the purposes of the Flood Risk Assessment. On this basis the Flood Risk Assessment concludes that the BESS infrastructure would be located in an area of low fluvial flood probability and that the Scheme would remain safe for its lifetime taking account of climate change allowances. Consequently, the scenario described in the representation whereby flooding could interact with the BESS infrastructure and give rise to secondary hazards is considered unlikely based on the modelled flood extents. Drainage and pollution control arrangements associated with the battery storage infrastructure are described in **Flood Risk**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Assessment and Drainage Strategy Annex J: Green Hill BESS [REP5-015], with operational and safety management arrangements set out in the **Outline Battery Storage Safety Management Plan [REP5-075]**.
LR-006	Major Accidents and Disasters	BESS fires	Solely relying on remote operation is where issues mainly arise. The applicant states that the control room will not be operational 24/7 and does not implement anything else to fill this evidenced critical gap in safety and emergency planning. In Arizona, USA, on 19 April 2019, four firefighters were seriously injured. It was reported by DNV GL [Ref 1] that at 17:07 one of the remote operators advised that a field service engineer was 'en route' to visually confirm a potential fire. At 17:40, the field service engineer called the emergency services and at 17:48 the emergency services arrived which is 41 minutes after the remote operator said they had sent someone to visually confirm a fire. In Liverpool, UK, on 15 September 2020, it was reported by Merseyside Fire and Rescue Service [Ref 2] that at 00:38 smoke was seen on CCTV, at 00:39 there was an explosion and at 00:41 the remote operator wrongly cleared the fire system warning. At 00:49 calls were made to the fire service reporting the large explosion. However, it was not until 01:26 the remote operator first made contact with the fire service and advised that the site posed a substantial electrical hazard to emergency responders. Both incidents show that remote only operation of a BESS site led to avoidable delays and resulted in the fire service arriving to a far more dangerous situation than would have occurred with timely intervention. Their lives and the lives of nearby residents were put	The incidents referred to occurred in relation to BESS systems integrating monitoring and control systems that pre-dated NFPA 855 standards. NFPA 855 (2026) requires rigorous BESS control and monitoring systems that are delivered remotely. All key BESS safety global standards require this capability. The concerns arising from the incidents reference have been robustly addressed by the updates in NFPA 855 and the Applicant is confident that this is no longer a credible safety concern. The Applicant has previously provided response to the Liverpool BESS fire in response to comment 'BPC-005' in the **Applicant's Response to Deadline 3 Submissions [REP4-022].**

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			at an entirely unacceptable level of risk due to the lack of supervision of the sites. In January 2026, it was reported by CTIF, the International Association of Fire and Rescue Services, that New York City lawmakers are weighing a temporary six month moratorium on new battery energy storage systems (BESS) as fire safety concerns continue to rise across the state [Ref 3]. The applicant unacceptably wants to further add to the risk by situating a BESS within Flood Zones 2 and 3 without a proper assessment.	
LR-007	General Matters	Project Risk and Harm	Solar Energy UK is an established trade association where members commit to adopting best practices in relation to the development of a solar farm. This includes ensuring all health and safety issues are addressed throughout the lifetime of the project. Green Hill Solar Farm Limited is not a member of Solar Energy UK and has therefore not opted into the industry's voluntary best practice framework including the '11 Commitments on Solar Farms' [Ref 4]. This raises questions about the extent to which the applicant is committed to following recognised sector standards. This is further reinforced as the applicant has repeatedly failed to rectify material omissions, presented misleading information to the public and the Examining Authority and has failed to demonstrate that they will ensure the health and safety of the public, animals and wildlife. Overall, the applicant's repeated failure to address material issues raises serious concerns about their approach to risk, the adequacy of their assessment of harm and their understanding of the legislative and regulatory requirements that apply to this project	As set out in the **Outline Skills, Supply Chain and Employment Plan [APP-552]** in section 7.3, Island Green Power, of whom the Applicant (Green Hill Solar Farm Limited) is a 100% subsidiary, are a member of Solar Energy UK, a signatory of the UK Industry Supply Chain Statement, and members of the international Solar Stewardship Initiative, which exists to collaboratively foster responsible production, sourcing, and stewardship of materials in the solar value chain. In the **Outline Skills, Supply Chain and Employment Plan [APP-552]** in paragraph 5.4.8 it is stated that all international suppliers will be held to a minimum quality with regard to professional and ethical working

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				practices as agreed by the members of Solar Energy UK. The **Outline Skills, Supply Chain and Employment Plan [APP-552]** is secured by Schedule 2, Requirement 20 of the **draft DCO Revision E [EX6/GH3.1_E]**.