

Green Hill Solar Farm

EN010170

Applicant's Response to Deadline 5 Submissions

Prepared by: Lanpro Services

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 6

The Applicant's Responses to Deadline 5 Submissions

Prepared by

Name: Anna Rowan / Charlotte Astrella

Job title: Senior EIA Consultant / Associate EIA Consultant

Approved by

Name: Jane Crichton

Job title: Technical Director

Revision	Date	Prepared by	Approved by
Original	24/03/2026	AR / CA	JC



1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides Green Hill Solar Farm Limited (the 'Applicant's') response to Written Representations (WRs) submitted by Interested Parties to the Planning Inspectorate (PINS) by 26 February 2026, relating to Examination Deadline 5 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 Response to Deadline 5 Submissions

2.1 National Grid Electricity Transmission

Table 2.1: [\[REP5-117\]](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
NGET-001	Draft DCO	Protective Provisions	The parties continue to engage and negotiate the protective provisions for the benefit of NGET to be included within the draft Order and are seeking to arrange all-parties call to discuss the interactions between the Green Hill Project and the NGET Upgrade Projects. NGET intends to provide a full update as to the status of these negotiations in its response to the Third Written Examiner's Questions.	The Applicant confirms that it continues to engage with NGET in respect of its Upgrade Projects, and the form of protective provisions and a side agreement are currently with NGET's solicitors for consideration. The Applicant remains confident that agreement will be reached before the end of Examination.
NGET-002	Draft DCO	Protective Provisions	Until satisfactory agreement has been reached with the Applicant, NGET must continue to reserve the right to make further submissions to the examination.	The Applicant notes this comment.



2.2 Stop Green Hill Solar

Table 2.2: [\[REP5-120\]](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-001	General Matters	Proposed Scheme	I would like to submit the attached video [REP5-130] to the Inquiry on the basis that it shows the actual experiences of residents when the first NSIP Solar Farm Cleve Hill, at Faversham, Kent was constructed and the subsequent impact of Cleve Hill Solar Park when it became operational in July 2025 (X has given Stop Green Hill Solar permission to share this video)	The Applicant refers to the points raised under item 3.2 in the Written Summary of the Applicants Oral Submission at Issue Specific Hearing 5 [EX6/GH8.1.44] . The Applicant would emphasise the infrastructure difference between the Scheme and Cleve Hill. The Green Hill Scheme would not permit the specific design deployed at Cleve Hill. The panel technology proposed for Green Hill is limited to fixed and single access tracker panels only.
SGHS-002	Landscape and Visual Impacts	Solar Panel layout	I believe that this video is relevant to the Green Hill Solar project because Mark Topping MA CMLI, Lanpro Design Director is responsible for the solar panel layout for both Green Hill Solar Farm and Cleve Hill Solar Farm. The East -West solar panel layout at Cleve Hill is visually devastating resulting in a rooftop of panels, the height of a bungalow, compared to the spaced-out panels with sheep grazing in the same field shown in IGPs consultation documents.	<p>The design of the Scheme has undergone an iterative development process involving collaboration between the Applicant, design team, and the environmental consultant team. This process has been informed by feedback received through various consultation activities, including engagement with stakeholders, statutory consultees, host authorities, local communities, and residents.</p> <p>The Design Approach Document [APP-560] demonstrates how the fundamental principles of good design have been embedded throughout the Scheme, which has been shaped by a series of design principles and parameters. These principles include for example a landscape-led approach, application of the mitigation hierarchy and delivery of biodiversity net gain.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting, helping to protect and enhance the landscape through the landscape- led design.</p> <p>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 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.</p> <p>The LVIA has undertaken a worse case assessment in accordance with the principles of the 'Rochdale Envelope' as set out within SGHS-003 below.</p> <p>As noted in the Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 5 [EX6/GHGH8.1.44] the type of panels used for Cleve Hill differ to those secured within the Concept Design Parameters and Principles [EX6/GH7.17_C] and assessed for the Scheme. Examples of tracking panels can be seen under Plate 4.1 and fixed panels under</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Plate 4.2 of the Scheme Description [REP1-031].</p>
SGHS-003	General Matters	Proposed Scheme and site selection	<p>The attached video shows the reality of what IGP is proposing at Green Hill Solar Farm rather than the broad-brush indicative project documents provided. Whenever detail of the project is requested by Interested Parties the applicant cites the Rochdale Envelope (NSIP Advice Note 9) principle for design flexibility to address uncertainty in respect of cable corridor location, location of the BESS infrastructure and changing technologies meaning that the actual infrastructure and layout for the project is not agreed before the DCO is finalised.</p>	<p>The Rochdale Envelope is a recognised and widely applied principle within the Development Consent Order process, as reflected in National Policy Statement EN-1, acknowledging that certain elements of a development may not be finalised.</p> <p>Due to the rapidly evolving technology within the Solar Photovoltaics and battery energy storage system sectors, the in-built flexibility allows for the most up-to-date technology to be utilised for the development of the Scheme. The detailed design at the point of construction will be managed post-consent through the Requirements set out in Schedule 2 of the Draft DCO [EX6/GH3.1_E].</p> <p>The Applicant has assessed the impacts of the Scheme within the maximum parameters set out in Chapter 4: Scheme Description [REP1-031]. The maximum design scenarios are further defined in the Concept Design Parameters and Principles [EX6/GH7.17_C], which are secured through a Requirement in the draft DCO [EX6/GH3.1_E].</p> <p>While the DCO process allows a degree of design flexibility, the Works Plans [EX6/GH2.4_G] identify the maximum extents within which different types of development</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>(including solar panels, substations and cabling) may be located.</p> <p>The Application therefore has outlined Scheme parameters that define the scale and extent of the Scheme. Any flexibility within those parameters is controlled through the DCO and its Requirements, which secure the approval of detailed design matters by the relevant planning authority prior to construction.</p> <p>The detailed design of the Scheme will be in accordance with these assessed parameters.</p>
SGHS-004	Draft DCO	Planning Inspectorate Advice	<p>Planning Inspectorate Advice Note 9 §1.3 states '... Energy (EN-1), the NPS for Renewable Energy Infrastructure (EN-3) and the NPS for National Networks all stress the need to ensure that the significant effects of a Proposed Development have been properly assessed'. Further, Advice Note 9 §2.3 states that such an assessment should be based on 'cautious worst case approach'; that the 'level of information required should be sufficient information to enable 'the main,' or the 'likely significant' effects on the environment to be assessed [...] and the mitigation measures to be described'; and that the need for 'flexibility should not be abused'..., given the nature of the project in question, the Interested parties should have 'full knowledge' of its significant effect'.</p>	<p>As outlined in the Applicants response to SGHS-003 the Concept Design Parameters and Principles [EX6/GH7.17_C] defines the key design parameters for the Scheme. The parameters reflect the worst-case scenario (Rochdale Envelope) adopted in the Environmental Impact Assessment that has been undertaken for the Scheme, as set out in ES Chapter 2 EIA Process and Methodology [APP-039].</p> <p>The spatial extent of the Scheme is referred to as the 'Order Limits' and is shown on the Works Plans [EX6/GH2.4_G] accompanying the DCO application. Article 3 of the draft DCO [EX6/GH3.1_E] confirms that each element of the Scheme must be carried out within the areas shown on the Works Plans. The Environmental Impact Assessment has been undertaken based on the maximum extents of each of the Work</p>



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				<p>Numbers described in Schedule 1 to the Draft DCO as shown on the Works Plans.</p> <p>This approach allows for a Scheme to be assessed on the basis of maximum project design parameters i.e., the worst-case scenario.</p> <p>For example, within ES Chapter 8: Landscape and Visual [APP-045] tracker panels have been assessed as the worst-case scenario due to their greater scale compared with fixed-tilt panels. In contrast, ES Chapter 15: Glint and Glare [APP-052] considers both fixed-tilt and tracker panel options, as either configuration could represent the worst-case scenario.</p>
SGHS-005	Scheme Description	BESS location	<p>As currently submitted, there is significant uncertainty regarding the locations of the BESS and the number of BESS, height and number of additional substations, as well as the height and configuration of the solar panels which are all fundamental to the scheme. Consequently, all Interested Parties do NOT currently have full knowledge of the Proposed Development as required under the EIA Regulations.</p>	<p>The scale and parameters of the Battery Energy Storage System (BESS), substations and solar panels are set out in the Concept Design Parameters and Principles [EX6/GH7.17_C] and ES Chapter 4: Scheme Description of the Environmental Statement [REP1-031].</p> <p>The Works Plans [EX6/GH2.4_G] identify the areas within which substations may be located, and the illustrative layouts [APP-193 to APP-206] submitted with the Application provide example configurations.</p> <p>Table 1 of the Concept Design Parameters and Principles document [EX6/GH7.17_C] sets out the parameters for Work No. 1, which includes the solar panels. The maximum height for fixed-tilt panels is 2.5 m, while the maximum height for</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>tracker panels (at their greatest inclination) is 4.5 m.</p> <p>Table 2 sets out the parameters for Work No. 2, which comprises the Battery Energy Storage System. BESS infrastructure can only be located within the area of Work No. 2 as identified on the Works Plans. BESS is proposed to be located at Green Hill BESS with option to also install BESS at Green Hill C. The parameters for individual BESS enclosures are as follows:</p> <ul style="list-style-type: none"> • Maximum length: 24m • Maximum width: 3m • Maximum height: 3.5m <p>Table 3 outlines the parameters associated with substations. Substations can only be located within the corresponding numbered areas identified on the Works Plans (Areas 3A to 3C).</p> <p>The Scheme includes two 400kV substations at Green Hill BESS and Green Hill C. In addition, on Green Hill A, B and F there will be a requirement for a 132kV substation on each of those sites. On Green Hill E there will either be a 132kV or 33kV substations. At Green Hill G there is an option for either a 132kV substation or a 400kV substation. The Scheme also includes provision for 33kV substations on Green Hill A.2 and Green Hill D.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SGHS-006	Scheme Description	Concept Design Parameters and Principles	<p>The purpose of the recent February 2026 Report from IGP, Concept Design Parameters and Principles Revision B- Change application 2, Doc ref CR2/GH7.17_B Is to address the design options being considered for all the electricity generating infrastructure needed for the 500 MW Green Hill Solar Farm.</p>	<p>The Second Change Request outlines four proposed changes to the Scheme. These changes have been identified following a detailed review of the existing electrical design. These changes comprise:</p> <ul style="list-style-type: none"> • Change 1: Optionality to allow for a 400 kV Substation at Green Hill G. • Change 2: Provision of tree planting for Green Hill G. • Change 3: Optionality to allow for up to 400 kV cabling between Green Hill BESS and Green Hill G; and optionality to allow for up to 132 kV cabling between Green Hill F and Green Hill G. • Change 4: Removal of Panels (Work No.1) and reduction of Work No. 1(d) from field AF29 and replacement with biodiversity mitigation and enhancement (Work No 9). <p>Please refer to the Change Application 2 and Supporting Environmental Information Report [CR2-024] for further details.</p> <p>The Concept Design Parameters and Principles Document [CR2-016] was updated to identify the maximum parameters within which the Option to have a 400kV substation at Green Hill G would accord with. Figure 1.1 of Appendix A of the Concept Design Parameters and Principles [CR2-016] illustrates the parameters within which infrastructure of varying heights can be located.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>The purpose of the Concept Design Parameters and Principles Document is to set out the design parameters and principles by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. It is secured by a Requirement in Schedule 2 to the draft DCO in order to prescribe the guiding design principles and parameters to inform the detailed design of the Scheme post DCO consent.</p>
SGHS-007	Scheme Description	Concept Design Parameters and Principles	<p>Having read the above document ref CR2/GH7.17_B it does not clearly state what the likely significant effect will be on the environment to be industrialised.</p> <p>Page 8 of the above Doc CR2/GH7.17_B sets out possible different types of solar panels that could be used but does not give any diagrams or layout drawings to give full knowledge and a conclusion as to which is the worst case scenario.</p> <p>Page 21 of the above Doc CR2/GH7.17_B states maximum height for onsite substations between 3.5m and 12.5m (the size of a 3 storey house) Can IGP give a worst case scenario as to where the 12.5m high substations will be located?</p>	<p>As outlined in the Applicants response to SGHS-006 above, the purpose of the Concept Design Parameters and Principles Document is to set out the design parameters and principles by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken.</p> <p>Environmental impacts arising from the Scheme have been assessed as part of the EIA process, and the results are presented within the ES [APP-037 to APP-064]; with a summary provided in the Non-technical Summary [APP-543 and APP-544].</p> <p>In regard to the Change Request, Section 5 of the Change Application 2 and Supporting Environmental Information Report [CR2-024] outlines the assessment of the Proposed Changes and document any alterations to the content of the ES [APP-037 to APP-064] and associated documents as submitted to the Planning Inspectorate on 23 May 2025 or as</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>since amended. Each topic section compares the effect of the change to the conclusions of the ES during the construction, operation and decommissioning phase, as well as identifies if the change results in any changes to the cumulative assessment (including in-combination effects) presented in the ES. The Supporting Environment Information outlined in Section 5 concludes that the assessments do not change, and no new or different residual likely significant effects have been identified for all topics.</p> <p>Indicative figures and sections of key components of the Scheme are included within Appendix 4.1: Engineering Drawings and Sections [APP-076].</p> <p>Examples are also outlined in Chapter 4: Scheme Description [APP-041].</p> <p>The Works Plan [EX6/GH2.4_G] identify the areas where the substations, panels and other components of the Scheme can be located and the illustrative layouts [APP-193 to APP-206] and Landscape and Ecology Mitigation Plans [EX6/GH6.4.4.10_D, EX6/GH6.4.4.11_C, APP-209, REP3-046, APP-211, EX6/GH6.4.4.14_C, EX6/GH6.4.4.15_C, APP-214, APP-215, REP3-052, REP1-113, REP3-054, EX6/GH6.4.4.20_B] include an example configuration for each Site.</p> <p>There are different types of substation required across the Scheme as noted in the Concept</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Design Parameters and Principles Document (Works 3A to 3C).</p> <p>The Scheme includes two 400kV substations at Green Hill BESS and Green Hill C, which have a maximum height of 12.5m. In addition, on Green Hill A, B and F there will be a requirement for a 132kV substation (maximum height of 6.8m) on each of those sites. On Green Hill E there will either be a 132kV or 33kV substations. At Green Hill G there is an option for either a 132kV substation or a 400kV substation. The Scheme also includes provision for 33kV substations (maximum height of 3.5m) on Green Hill A.2 and Green Hill D.</p> <p>Further details on the Scheme's infrastructure is outlined within ES Chapter 4: Scheme Description [REP1-031].</p>
SGHS-008	General Matters	Proposed Scheme	<p>As someone who lives near the proposed scheme and will be greatly affected if the solar farm is built it seems too much is being left to chance and further diagrams of the proposed infrastructure and layout drawings should be provided. Any plans, diagrams and maps should be an Appendix attached to the relevant Document rather than signposted elsewhere in the document library which is still difficult to navigate.</p>	<p>The Applicant notes this comment, please refer to the comments above in regard to relevant documents.</p>



2.3 Pam Heavyside

Table 2.3: [\[REP5-125\]](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PH-001	Socio-economics	Significant Impact on local business in Mears Ashby. - Tourism	<p>I would like to object to this monstrosity of a plan on many counts which have already been presented. However, in particular the tourism factor has not in my opinion been considered enough.</p> <p>North and West Northamptonshire councils launched their joint Tourism policy Jun 25 - And I quote 'which aims to raise the profile of the county's fantastic history and heritage attractions, sports teams and cultural assets, also its beautiful rolling countryside, rivers and waterways. There is now a greater emphasis to establish the area as a vibrant must-visit destination, offering unique experiences and accommodation options serving our best blue and green areas'. One example of this is Beckworth Emporium where I know you have visited in your site visits in December 2025. Beckworth has had two major refurbishments in the last 5 years due to its increasing popularity. It has increased its car parking spaces to 510 and can seat 400 in its restaurant spaces. It is a prime attraction in the area and is extremely popular. The applicants Environmental Statement Appendix 17.1: Tourism and Recreation Receptor Tables GH6.3.17.1_A : -Quotes: 'Immediate views of Site C, potential loss of amenity and</p>	<p>The joint Northamptonshire's Tourism Strategy 2023-2030 was published in March 2024 and therefore was considered in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] as part of the local policy baseline, and briefly commented upon at paragraph 17.3.43 therein. An update to the hosting webpage on West Northamptonshire Council's website was made in June 2025, which this comment is referring to, but it does not appear that the policy paper was updated itself at that point.</p> <p>The Applicant does not consider that the Scheme contravenes any policy or strategic aspirations set out in Northamptonshire's Tourism Strategy 2023-2030, and no objection on this basis has been made by either North Northamptonshire Council or West Northamptonshire Council.</p> <p>The assessment of Beckworth Emporium is included under Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079].</p> <p>Table 1 provides a description of the local visitor attractions, describing Beckworth Emporium likely to experience '<i>Immediate views of Site C, potential loss of amenity and desirability. Likely</i></p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>desirability. Likely impacts on accessibility and delay due to traffic from Scheme'. A further 20 locations are to be assessed in the ES. I have been unable to find clear mitigations on these in the high volume of reports even though I've tried VERY hard. Please can these be made clearer and can the applicant confirm it has conducted an open and honest meeting with Beckworth or its owners Blue Diamond? The BESS C build at this location will cause a serious material impact on this business and surrounding areas.</p>	<p><i>impacts on accessibility and delay due to traffic from Scheme'</i>.</p> <p>Table 10 outlines assessment of likely significant effects on local visitor attractions. The assessment includes consideration of embedded and additional mitigation measures. The assessment identifies no significant effects on Beckworth Emporium throughout construction and operation (including peak replacement).</p> <p>During construction the embedded mitigation measures for Beckworth Emporium include transport mitigation and separation offsets from the public highway to the construction activities within Green Hill C.</p> <p>During operation the embedded mitigation measures for Beckworth Emporium also includes additional landscape screening planting to provide visual screening from the development.</p> <p>During the replacement phase embedded mitigation measures for Beckworth Emporium include transport mitigation and separation offsets from the public highway to the construction activities within Green Hill C.</p> <p>The Outline Construction Traffic Management Plan [EX6/GH7.9_C] controls construction traffic movements, to the benefit of accessibility and recreational use of highways; use, accessibility and desirability of recreation centres and facilities; and on the accessibility and desirability of local tourist attractions. The routing and</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>number of HGV movements set out in the OCTMP, is secured by Requirement 15 in Schedule 2 to the draft DCO [EX6/GH3.1_E].</p> <p>The Scheme design provides embedded offsets and planting buffers from roads and other tourism destinations to onsite infrastructure, to reduce the visual impacts on these receptors for tourism and recreational use during construction, as described in detail in ES Chapter 8: Landscape and Visual Impact [APP-045]. The visual assessment for Beckworth Emporium Garden Centre is set out in Appendix 8.3: ES LVIA Assessment Sheets [REP1-041] under RI100, which identifies a minor effect during construction and during operation (year 1); by year 15 mitigation planting would screen views north into CF5 and CF6 resulting in a minor/negligible effect.</p> <p>The Scheme design is secured through the Works Plan [EX6/GH2.4_G] and Concept Design Parameters and Principles [EX6/GH7.17_C] through Requirement 5 in Schedule 2 to the draft DCO [EX6/GH3.1_E], while the provision of landscape planting and screening measures is secured by the Outline LEMP [EX6/GH7.4_E] through Requirement 7.</p>



2.4 Hadley Brown

Table 2.4: [\[REP5-124\]](#)

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]				
HB-001	General Matters	Island Green Power	I would like to raise some serious points about the company in which the government (if approved) is going to enter into very valuable CfDs with. Whilst I appreciate this is not directly a planning point it is very much a risk and reputation point for the government who are very sticky ground with recent issues. I we are to build the UKs Energy Security model it should be with reputable companies that commit to a putting UK profit back into the UK economy. (a circular economy which can benefit)	The Applicant is ultimately owned by three investment funds, which are managed by Macquarie Asset Management on behalf of a range of investors, including a number of UK pension funds. These investors would receive returns through the funds, while Macquarie would receive management fees, as is standard. Further funding may come from commercial lenders, who would receive interest payments. The funding structure is common in the energy sector and ensures that the Scheme is financially robust and deliverable.
HB-002	General Matters	Island Green Power	<p>Macquarie Asset Management Company, Island Green Power and Green Hill Solar</p> <p>The applicant is owned by Island Power whose parent company is Macquarie Group. It has been investing in the UK since 1989 and has a range of interconnecting projects, from airports, to energy, data centres fibre connections to name a few. Some of its investments have not been successful and have had bad publicity; namely</p> <ol style="list-style-type: none"> 1. Thames Water which it left £2bn in debt and had extensive sewage pollution and was fined £20m during its ownership 	<p>The Applicant notes that the matters raised concerning the history of its parent company's shareholder are not planning matters.</p> <p>On the issue concerning Lime Down Solar Park, another scheme that is owned by the Applicant's parent company, the Applicant acknowledges that there were concerns about some wording in heads of terms issued to landowners. As explained publicly at the time, the wording criticised did not form part of the company's standard heads of terms and should not have been included. After investigating, Island Green Power addressed this with the team responsible and sent corrected versions to all landowners.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>2. New Earth Ventures in Avonmouth, a waste gasification plant which reportedly only ran at 11% capacity.</p> <p>3. A German Tax scandal allowing customers to x multiple tax refunds on dividends</p> <p>4. The FCA fined Macquarie Bank £13m for serious control failures 2024</p> <p>5. In Aug 24 The Central bank of Ireland issued a serious warning about X</p> <p>6. Dec 25 Macquarie Securities agreed to pay a \$35 million civil penalty after being X to report up to 1.5 billion short sales spanning 15 years.</p> <p>7. Lime Down Solar Farm- letters of X sent to residents from Island Power who were X the under the condition they X. Island Power subsequently apologised X and operating for maximum profit.</p>	
HB-003	General Matters	Island Green Power	Where they have invested vast sums of money in high risk projects, but for whatever reason have they have walked away. The complex company structure means that all large projects are stand alone so it does not create company contagion if one fails. Their investment website clearly promotes active investing in green field sites. TrustPilot rates Macquarie 1.3/5 in Australia.	<p>The Applicant respectfully disagrees that a structure in which a single project is owned by a single company is complex.</p> <p>The company structure is common for major projects, and ensures all agreements, approvals, commitments and conditions remain with the project if sold, binding any future owner.</p>
HB-004	General Matters	Island Green Power	What attracts a company like this to invest in UK? I would suggest profit and Clearly, the Contracts for Difference, Annual Investment Allowance, Purchase power agreements, schemes are attracting the	The Applicant is confident in its Funding Statement [APP-020] , which explains that through its parent company, the Applicant can procure the financial resources necessary to fund the works to be authorised by the Order. This document includes



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>applicant to the UK, but profits are going outside the UK and are not for re-investment in the UK.</p> <p>The lack of a circular economy should be a red flag and a clear warning sign to all. Green Hill Accounts have been submitted to HMRC but do not hold credit balances to support the construction and build etc.</p> <p>Why does the UK government and Examiners consider companies like this who clearly are not working for the benefit of the UK and its people?</p> <p>The applicants funding statement is very weak and sparse to say the least. There is little evidence of how it will benefit local communities and they say they will power 115k houses and portray pictures of grazing sheep. HOW MANY SHEEP HAVE THEY GOT AGREEMENT TO USE AS PASTURES?</p> <p>In reality they are likely to either sell it on or sell electricity to the highest bidder or even worse use as a data centre for AI. If agreed, and the latter is used can the Inspectors include caveats in the DCO that mean that they have to go back to AW, Fire Service and key strategic bodies to ensure water and fire needs are re-considered. If this were an advertisement the ASA would say they are people.</p>	<p>further information on the Applicant's corporate structure and how the DCO is proposed to be funded.</p> <p>The Applicant's Statement of Need [APP-556] explains that the Contracts for Difference (CfD) is the government's main mechanism for supporting low carbon electricity generation.</p> <p>Should consent for the Scheme be granted, the Applicant may seek to put the Scheme forward to participate in a future CfD round. However, winning a CfD contract is not a requirement for this Scheme or low carbon schemes generally, to proceed to operation.</p> <p>The CfD mechanism has stringent eligibility requirements. It is a competitive mechanism which aims to support new renewable generation projects by providing direct protection from volatile wholesale prices, while protecting UK consumers from paying increased support costs when electricity prices are high.</p> <p>The developers of renewable projects which win a CfD enter into a private law contract with the Low Carbon Contracts Company (LCCC), a government-owned company.</p> <p>A CfD contract does not start until a CfD project is satisfactorily commissioned, ensuring that developers are only supported when benefits are delivered. The mechanism also includes provisions which are designed to disincentivise the developer from</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>delivering a scheme which does not deliver the quantum of benefits anticipated at CfD award.</p> <p>The Applicant has set out its position on community benefits 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].</p> <p>In reference to sheep grazing, 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.</p> <p>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 there is no reliance is put on sheep grazing.</p> <p>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 Schemes.</p> <p>The Applicant will set out the approach to grazing in the detail Landscape and Ecological Management</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>Plan which is secured in Schedule 2, Requirement 7 of the draft DCO Revision E [EX6/GH3.1_E].</p> <p>The Applicant would highlight that its Application is not for a data centre. The Applicant would not be able to build a data centre without seeking a very different planning consent. The Scheme proposes to connect to an existing part of the NETS National Electricity Transmission System with sufficient capacity to transmit the energy the Scheme will generate to power homes, vehicles, offices, shops, and factories, both locally and nationally.</p>



2.5 Shena Howell

Table 2.5: [\[REP5-126\]](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SH-001	Flood Risk	Flooding in Grendon	<p>I thought you may find the attached information of interest with specific reference to flooding on part of the proposed Grendon BESS site and the bridges over the Nene at Whitemills Marina and Hardwater crossing, both of which are currently impassable. (And Billing Mill is not far behind!).</p> <p>This information is directly from the Government Flood alert site. I appreciate IGP claim they have conducted their hydrological surveys on these sites, but as STOP Greenhill Solar and many other locals have repeatedly stated, this is fact and flooding in these areas happens on a regular basis. You can clearly see the extent that the rivers have swollen on the graph and the map clearly shows the areas of flood alert which include part of the Grendon BESS site to the West of the substation.</p> <p>It also highlights the difficulty for ANY transport to get across the Nene when these events occur.</p>	<p>The Applicant acknowledges the representation regarding recent flood alerts associated with the River Nene and surrounding infrastructure, including crossings at Whitemills Marina and Hardwater. Flood alerts issued by the Environment Agency indicate the potential for flooding within defined river catchments during periods of elevated river levels. These alerts reflect wider catchment conditions and do not in themselves indicate that development land is located within areas of functional floodplain or that it is unsuitable for development.</p> <p>Flood risk associated with the Scheme, including the Green Hill BESS site at Grendon, has been assessed in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C] and the Flood Risk Assessment and Drainage Strategy [REP5-021], with site-specific assessment provided in Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS [REP5-031]. These assessments utilise Environment Agency Flood Map for Planning data, detailed topographic survey information and hydraulic modelling where required.</p> <p>The assessments confirm that the proposed BESS infrastructure and associated built development are located within Flood Zone 1, which represents land with a low probability of fluvial flooding. No built</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>development is proposed within the functional floodplain.</p> <p>The assessments conclude that the Scheme would remain safe for its lifetime, taking account of climate change allowances, and would not increase flood risk elsewhere.</p> <p>Section 5.12 of the Outline Construction Traffic Management Plan (Revision C) [EX6/GH7.9_C] sets out the procedure in the event of incident on an HGV route. In the event of flooding on a proposed HGV route. The procedure considers monitoring of events, the cancellation of HGV movements and the use of alternative routes as agreed by the police or highway authority.</p>



2.6 Charlotte Brown

Table 2.6: [\[REP5-123\]](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
CB-001	Site Layout	Removal of panels for PROW	<p>Ultimately, I do not wish for this project to go ahead. I have confidence that the Inspectorate Team are looking at all areas within scope although I believe that the scope of the NSIP may not cover some important factors. I do not have confidence that the SoS will adhere to the Inspectorates recommendation which is very concerning.</p> <p>The only way I would consider the project is if we could reduce the vast areas of solar arrays and reduce the fields which border PROW and rural roads. This would give people some natural breathing space on PROW and reduce the sunlight glare on rural roads and allow the natural habitat to thrive.</p>	<p>The design of the Scheme has undergone an iterative development process involving collaboration between the Applicant, design team, and the environmental consultant team. This process has been informed by feedback received through various consultation activities, including engagement with stakeholders, statutory consultees, host authorities, local communities, and residents.</p> <p>The Design Approach Document [APP-560] demonstrates how the fundamental principles of good design have been embedded throughout the Scheme, which has been shaped by a series of design principles and parameters. These principles include for example a landscape-led approach, application of the mitigation hierarchy and delivery of biodiversity net gain.</p> <p>The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting, helping to protect and enhance the landscape through the landscape- led design.</p> <p>Please refer to Section 5.8 of ES Chapter 5: Alternatives and Design Evolution [APP-042]</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>which provides an overview of the design evolution.</p> <p>The landscape mitigation strategy has evolved to include distance buffers and proposed planting to assist in mitigating visual impact from landscape receptors.</p> <p>A 15m offset from the PRow to the proposed fenceline has been allowed for on both sides (as a minimum), and then an offset of 4m from proposed fenceline to the proposed panels. This gives a total width of 38m from panel to panel along the route of the PRow.</p> <p>The Applicant has reviewed the recommendations for the removal or reduction of solar arrays and has provided responses identifying where offsets or mitigation have been applied. If panels were to be removed or partly removed from the referenced fields, this could result in a loss of up to approximately 90MW of generating capacity, which would impact the viability of the Scheme. Where the exact panel array area identified for removal has not been stated the Applicant has made assumptions in order to calculate this figure.</p>
CB-002	Scheme Description	Removal of Panels	<p>My recommendations would be as follows:</p> <p>Site A- Remove or reduce the solar arrays next to the road AF 14, 15, 16, 17 and AF 29 –</p> <p>I appreciate that AF 29 has now been removed but we need to go much further.</p>	<p>Note: The offsets provided in the responses below are measured to the proposed wooden post fence, there will be an additional 4m separation distance from the fence to the proposed panels.</p> <p>Green Hill A</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			Site A2 - Remove AF1 and AF2	<ul style="list-style-type: none"> • AF14 – A 15m offset from hedgerows adjacent to the public highway and the 'green lane' have been applied. • AF15 - solar panels have been sited further to the east than original concept plan due to topography and views from the existing property on Newland Road. • AF16 and AF17 – 15m offsets adjacent to the public highway and the 'green lane' have been applied. <p>Green Hill A.2</p> <ul style="list-style-type: none"> • A2F1 - following engagement with residents of Rectory Farm it was agreed to increase the buffer (50m) surrounding A2F1 to reduce any potential visual impacts. Sections of A2F1, have been excluded from solar arrays due to archaeology considerations and utility avoidance. • A2F2 - A 50 m offset from the public highway to the Solar PV array has been applied to ensure consistency in offsets from residential dwellings at New Lodge Farm.
CB-003	Scheme Description	Removal of Panels	<p>Site C - Remove CF1 and CF6 as they are too close to buildings</p> <p>CF5 Push the panels back away from the road</p>	<ul style="list-style-type: none"> • CF1 – No panels are proposed in this location (or in CF4). This field is proposed to be Proposed Ground Nesting Bird Mitigation - Set Aside as shown on REP3-046. <p>CF1 was removed following consultation with Sywell Aerodrome and to avoid glint and glare</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>impacts and to provide additional emergency landing space for aircraft. The removal of solar panels from CF1 also avoids archaeological impacts.</p> <ul style="list-style-type: none"> • CF6 – A 15m offset from hedgerows , and a minimum 50 m distance to the residential property at Glebe House has been applied. • CF5 - A 15m offset from hedgerows has been applied both adjacent to the highway and to bridleway NN TN 7.
CB-004	Scheme Description	Removal of Panels	Site D - Remove DF1,2 and 3 as they are all too close to farms and business	<ul style="list-style-type: none"> • DF1 – A 50m offset from properties has been applied as well as a 15m hedgerow offset adjacent to the highway. • DF1, DF2 and DF3 have been offset from footpath NN TN 3 (both definitive and 'as-walked' routes) and hedgerows adjacent to Highfield Road to the east.
CB-005	Scheme Description	Removal of Panels	<p>Site E –</p> <p>Remove EF33 - Too close to the road</p> <p>EF 22 - Push back panels to start in line with field EF23</p> <p>EF 10,11,12 and 5 - Push back away from the road so less obtrusive</p> <p>EF 13,14,15 and 16 - Push panel back away from the road to make a clearer corridor</p>	<ul style="list-style-type: none"> • EF33 - A 15m offset from the hedgerow adjacent to the highway has been applied. • EF22 – A 15m offset from hedgerows on the site boundaries and existing access track have been applied, and a 20 m offset from woodland has been applied. • EF10, 11,12 – An offset of a minimum of 60m on northern side of Wilby Road has been applied.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<ul style="list-style-type: none"> • EF5 - Development offset minimum of 40m within EF5 from Wilby Road, with the majority of Development set back a minimum of 60m. • EF13, EF14 and EF15 - A set back of at least 55m from panels has been implemented along Wilby Road. • EF16 – No panels are proposed in this location. This field is proposed to be Proposed Ground Nesting Bird Mitigation - Set Aside and Existing Vegetation To Be Retained And Enhanced as shown on REP3-050.
CB-006	Scheme Description	Removal of Panels	<p>Site F - FF10 Push panels back from the PROW</p> <p>FF11 reduce the panels from the NE and SE side of the field around the PROW</p> <p>FF18 and FF19 - Push the panels back further to make a wider PROW</p>	<ul style="list-style-type: none"> • FF10, 11 and 19 - A minimum 15m offset from hedgerows and footpaths NN TD 2 and NN TD 3 has been applied. • FF18 – Part of FF18 discounted for siting solar arrays due to land being within Flood Zone 3 (highest zoned land for probability of flooding).
CB-007	Scheme Description	Removal of Panels	<p>Site G - GF1 Reduce panels in the South side of the field</p> <p>GF3 Reduce panels in the north of the field on the farm boundary</p> <p>DF4 [<i>sic</i>] and reduce panels on the north side and east side of the field along the PROW</p> <p>GF5 and GF7 reduce panels along the east side of the field</p> <p>GF6 Reduce panels along the west south and east of fields adjacent to the PROW</p>	<ul style="list-style-type: none"> • GF1 – A 15m offset from footpath Lavendon 005 has been applied. • GF3 – A 15m offset from hedgerow and 20m offset from woodland has been applied. Solar PV Arrays >100 m from residential properties at Northey Farm. • GF4, 5, 6, 7 and 9 – A 15m offset from hedgerows and PROWs (footpaths Lavendon 001 and 005, and bridleways Lavendon 002 and 004) has been applied.



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			<p>GF9 reduce panels on the east and north sides running along the PROW</p> <p>GF13 Reduce panels on the east side advance to the buildings by note 5 on plan.</p> <p>This would be far more amenable to local communities who will be seriously impacted if this goes ahead.</p>	<ul style="list-style-type: none">GF13 - A 50m offset from properties has been applied, and a 15m offset from bridleway Lavendon 014 has been applied.



2.7 David Bennett

Table 2.7: [\[REP5-122\]](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DB-001	Flood Risk and Hydrology	Surface Water Runoff	In common with many of the residents impacted by the proposed Green Hill Solar farm development, I'm concerned that the installation of large numbers of solar arrays across agricultural land may alter surface water runoff characteristics thereby increasing the severity and/or frequency of flood events in areas already subject to flood risk.	<p>Potential effects of the Scheme on surface water runoff have been assessed within ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C] and the Flood Risk Assessment and Drainage Strategy [REP5-021].</p> <p>Solar photovoltaic panels are mounted on piled supports and do not create continuous impermeable surfaces across the land. Rainfall falling on the panels drains to the ground beneath and between panel rows where it infiltrates or flows across existing soils and vegetation. The panels therefore do not introduce sealed hardstanding that would materially alter the hydrological response of the land.</p> <p>National policy also recognises that solar PV panels drain to the existing ground and, in general, do not give rise to significant drainage impacts.</p> <p>The Flood Risk Assessment concludes that the presence of the solar arrays would not result in a significant increase in runoff leaving the Order Limits. Where permanent infrastructure introduces hardstanding, including substations or battery storage</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>infrastructure, these areas are subject to dedicated drainage design.</p> <p>The Scheme would therefore not increase the severity or frequency of flood events and would not increase flood risk elsewhere.</p>
DB-002	Flood Risk and Hydrology	Surface Water Runoff	<p>The applicant's position on this aspect of flood risk, as documented in EX1/GH6.2.10_A and EX1/GH6.3.10.1_A, is that the presence of the panels does not result in a significant increase in surface water runoff. This position was echoed at Issue Specific Meeting ISH1 on 22 October 2025 when, in response to a question on this topic, the applicant's representative stated: "It's a common misconception that solar panels exacerbate flooding"</p>	<p>The Applicant's position regarding surface water runoff is set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C] and the Flood Risk Assessment and Drainage Strategy [REP5-021].</p> <p>The assessment recognises that rainfall falling on solar panels is shed to the ground surface. However, because the panels are elevated and supported on piles, the underlying ground remains permeable and vegetated. Rainfall therefore continues to infiltrate to soil or flow across the existing ground surface rather than being directed to a sealed drainage network.</p> <p>The assessment concludes that the solar arrays would not lead to a significant increase in runoff rates or volumes leaving the Order Limits. This conclusion reflects the nature of the development and the maintenance of permeable ground conditions beneath and between the panels.</p> <p>Where areas of permanent hardstanding are proposed, such as substations and energy storage infrastructure, these are treated</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				separately and subject to appropriate drainage design.
DB-003	Flood Risk and Hydrology	Surface Water Runoff	(EVS2-008/EN010170-000696-GHS_ISH1_PART4, 1:26:51). At various junctures, the applicant has cited a research paper (Cook and McCuen, 2013) in support of their position. That research, conducted more than 12 years ago, uses mathematical models to simulate the impact of solar panels on surface water runoff behaviour.	<p>The conclusions presented in the application are based on a Scheme-specific assessment rather than reliance on any single academic publication.</p> <p>The assessment of hydrology, flood risk and drainage is set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C] and the Flood Risk Assessment and Drainage Strategy [REP5-021]. These documents consider the site characteristics, including topography, soils, land use, flood zones and existing drainage pathways across the Order Limits.</p> <p>The conclusions reached are therefore based on the characteristics of the Scheme and its receiving catchments. Published literature may be referenced within the supporting material, but the determination of likely effects for the Scheme is based on the site-specific assessment undertaken as part of the Environmental Impact Assessment and Flood Risk Assessment.</p> <p>On this basis the Applicant concludes that the solar arrays would not result in a significant increase in runoff leaving the Order Limits and would not increase flood risk elsewhere.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DB-004	Flood Risk and Hydrology	Preliminary Report on Runoff Characteristics from Utility-Scale Solar Sites	<p>A team at Virginia Tech College of Agriculture and Life Sciences is 2 years into a 6-year study to quantify stormwater-related impacts of utility-scale solar development. In the team’s initial study paper “Preliminary Report on Runoff Characteristics from Utility-Scale Solar Sites” (Stewart, Mier-Valderrama, Hoben, Sample, Lee Daniels, 2025), it’s noted by way of introduction that “... there continues to be much uncertainty regarding the extent to which development of utility-scale solar installations alters the magnitude and timing of stormwater delivery. There have been little-to-no measurements of surface runoff from utility-scale solar areas under real-world conditions ...” (Stewart et al., 2025, p2). In an attempt to bridge this knowledge gap, the Virginia Tech study is measuring and quantifying precipitation and surface water runoff at a number of designated catchment sites, some of which contain existing solar installations while other comparable [reference] sites reflect pre-existing land use (e.g. agriculture).</p>	<p>The Applicant notes the reference to external research concerning runoff from utility-scale solar developments. The assessment of Green Hill Solar Farm is based on the Scheme-specific evidence submitted with the application.</p> <p>The baseline conditions across the majority of the Order Limits comprise agricultural land with permeable soils and established vegetation cover. Solar arrays are proposed as elevated panels supported on piles and do not create continuous impermeable surfaces. Rainfall falling on the panels drains to the ground beneath and between panel rows where it infiltrates or flows across existing soils and vegetation.</p> <p>Areas of genuinely impermeable infrastructure, including substations and battery storage areas, represent discrete elements of the Scheme and are subject to separate drainage design.</p> <p>Potential effects on hydrology and flood risk are assessed in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C] and the Flood Risk Assessment and Drainage Strategy [REP5-021]. These assessments conclude that the Scheme would not increase runoff leaving the Order Limits and would not increase flood risk elsewhere.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				<p>This approach is also consistent with national policy. NPS EN-3 paragraph 3.10.75 states that solar PV panels drain to the existing ground and the drainage impact will not, in general, be significant.</p>
DB-005	Flood Risk and Hydrology	Preliminary Report on Runoff Characteristics from Utility-Scale Solar Sites	<p>The preliminary report published in November 2025 contains results and findings based on data gathered from January 2024 onwards. The preliminary report Executive Summary contains the statement: "Our analysis showed that catchments within solar arrays tended to produce rapid, and at times substantial, amounts of surface runoff during storms. Based on the median and maximum storms measured at each site, catchments with solar arrays produced greater runoff volumes than reference catchments" (Stewart et al., 2025). The Results section of the report includes analysis and commentary based on statistics gathered for precipitation depth (P), runoff depth (Q), and runoff ratio (R), for instance "... at Site A the median storm (by Q) produced R values of 0.10-0.20 in the catchments with solar development (meaning that 10-20% of P was converted into measurable Q), versus 0.02 in the two reference catchments" (Stewart et al., 2025, p14).</p>	<p>The representation refers to findings from a separate research study concerning runoff behaviour at utility-scale solar developments.</p> <p>The Applicant's position on the potential effects of solar arrays on surface water runoff is addressed in the response to representation DB-004. That response explains the basis of the Scheme-specific assessment and the relevant national policy context.</p> <p>As set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C] and the Flood Risk Assessment and Drainage Strategy t [REP5-021], the assessment for Green Hill Solar Farm is based on the characteristics of the Order Limits and the design of the Scheme.</p> <p>For the reasons set out in response DB-004, the Flood Risk Assessment concludes that the solar arrays would not increase runoff leaving the Order Limits and would not increase flood risk elsewhere.</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DB-006	Flood Risk and Hydrology	Preliminary Report on Runoff Characteristics from Utility-Scale Solar Sites	<p>The findings to date of the Virginia Tech study suggest that the presence of solar panels can materially affect runoff behaviour increasing both volume and rate of surface water runoff. I would ask that the ExA examines in detail the information afforded by the study and reviews whether this area of concern has been adequately addressed within the Green Hill Solar application</p>	<p>The representation concerns the same research study and issue addressed in the Applicant's responses to DB-004 and DB-005.</p> <p>The Applicant's position on the potential effects of solar arrays on surface water runoff is set out in those responses and in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C] and the Flood Risk Assessment and Drainage Strategy [REP5-021].</p> <p>The assessment of Green Hill Solar Farm is based on the characteristics of the Order Limits and the design of the Scheme. Across the majority of the Order Limits, panel areas remain permeable and vegetated, with rainfall draining to the ground beneath and between panel rows rather than to a sealed drainage network. Areas of permanent hardstanding are limited and are subject to separate drainage design.</p> <p>This approach is consistent with national policy. NPS EN-3 paragraph 3.10.75 states that solar PV panels drain to the existing ground and the drainage impact will not, in general, be significant.</p> <p>For the reasons set out in responses DB-004 and DB-005, the Applicant considers that this matter has been adequately addressed within the application and that the Scheme would not</p>



Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				increase runoff leaving the Order Limits or increase flood risk elsewhere.



2.8 Helen Elderkin

Table 2.8: [\[AS-018\]](#)

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
HE-001	Draft DCO	Consultation	<p>Dear Sir, I have received lots of correspondence via telephone and email over the last few months regarding my interest in land that is affected by the Green Hill Solar project.</p> <p>These calls and correspondence were not clear and in fact have been played down in subsequent meetings. This is in contrast to offers to go through plans to ascertain my ownership rights, in my own home.</p> <p>As I understand it we own the subsoil rights in Station Rd outside our property and have rights of access across the substation title deed.</p> <p>We strongly object to the Green Hill Solar project and the tactics used to obtain information. These communications are unsettling I am unsure what the implications are of these tactics.</p>	<p>Ms Elderkin is identified within the Book of Reference as benefitting from rights granted by a transfer dated 31 March 1977 over plot numbers 13-176 and 13-183. The Applicant has also now confirmed that Ms Elderkin benefits from a presumed subsoil interest in Station Road, which is unregistered highway, contained in plot 13-177-b. This interest will be added into the next revision of the Book of Reference to be submitted at Deadline 7. The Applicant has sought to understand the exact route of the access referred to by Ms Elderkin so that this may be accurately reflected in the Book of Reference. While the Applicant is confident that their correspondence has been appropriate, we apologise for any distress that it has caused.</p>