Green Hill Solar Farm

EN010170

Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicants Responses

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Contents

Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 6

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1 Introduction

1.1 Purpose of the Document

1.1.1 This document provides Green Hill Solar Farm Limited's (the 'Applicant's') response to oral submissions made to the Planning Inspectorate (PINS) at Open Floor Hearing 3 (OFH3), held 10 March 2026. These hearings provided the opportunity for registered Interested Parties (IPs) and other local people to make oral representations about the application. Each IP making an oral submission was requested to provide a written summary note to the ExA for Deadline 6.

1.1.2 The following people and organisations were present and made submissions at the OFH3: Philip Mason, Stewart Andrew, Sarah Bool, Trevor Higgs, Brian Skittrall, Linda Twohey, Kate Brown, Tim Graham, Bernard Livesey, Dr Marie Midgley, Shena Howell, Tony Mulvaney, Keith Burrell, Steve Townsend and Philip Anthony.

1.1.3 This document sets out the Applicant's response to the comments made at the OFHs. The comments have been grouped by speakers making oral representations. Where multiple representations cover the same topic area, a detailed response will only be provided for the first occurrence. Where the Applicant has made commitments on the topic, the relevant application documentation is identified. This document also provides a written summary of the oral submissions made on behalf of the Applicant at OFHs in the time allocated by the Examining Authority.

1.1.4 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.

1.1.5 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 6 to the Planning Inspectorate.

1.2 Summary of the Applicant's Oral Submissions at OFH3

1.2.1 Claire Brodrick, partner at Pinsent Masons LLP, appeared for the Applicant. Ms Brodrick thanked everyone for attending and confirmed that the Applicant had taken detailed notes of the submissions made. Ms Brodrick noted at the outset that the Applicant would be responding to a number of matters in writing as part of its Deadline 6 submission but sought to clarify a number of matters raised.

1.2.2 In respect of comments relating to the interaction of the Scheme with designated sites, Natural England in its response to the Report on the Implications for European Sites **[REP5-129]** has confirmed it is content with the Applicant's assessment of no adverse effects on integrity and is satisfied with the mitigation measures proposed. That document was published on the day of the hearing, meaning not everyone would have had the opportunity to look at it. Ms Brodrick noted that this position is consistent with the agreed Statement of Common Ground with Natural England submitted at Deadline 5 **[REP5-106].**

1.2.3 In relation to the selection of sites for inclusion in the Scheme, including the use of best and most versatile agricultural land, Ms Brodrick explained that the

Applicant has undertaken a site selection process, as reported in the Site Selection Assessment Report **[REP1-037]**. This sets out the reasons why it has been necessary to use BMV land. She confirmed that the Applicant's position is that it has complied with the requirements of National Policy Statements EN-1 and EN-3, and that there is a strong need for the proposed infrastructure, which is of critical national priority.

1.2.4 With regard to aircraft crash sites, Ms Brodrick confirmed that the Applicant had applied for a licence from the Joint Casualty and Compassionate Centre (JCCC), and that a licence was granted on 10 February 2026. It is not anticipated that there are any crash remains, but the licence was applied for and issued on a precautionary basis. Amendments to the draft Development Consent Order **[REP5-008]** have been made to make it clear that the licence will apply to such remains.

1.2.5 In relation to comments made about decommissioning, Ms Brodrick referred to the Applicant's response to question 2.1.10 in the responses to the Second Written Questions **[REP3-074]**. Decommissioning is secured by a Requirement in the draft DCO, which is enforceable on the basis that failure to comply with the Requirement would constitute a criminal offence. The Secretary of State considered the need for separate decommissioning funds to be secured by in the DCO in the Oaklands Farm Solar Park decision, and was satisfied that the decommissioning Requirement was sufficient. She also explained that, in respect of landowners for the solar sites, security arrangements form part of the relevant property agreements. She confirmed that there are provisions for the establishment of a fund or other form of security to address decommissioning as part of the voluntary agreements.

1.2.6 In relation to access to field AF9, Ms Brodrick confirmed that the Applicant's intention is to utilise an existing watercourse crossing for construction purposes.

1.2.7 Turning to battery safety, the Applicant will provide cross-references to the reasons why the outline Battery Storage Safety Management Plan [REP5-075] needs to be in outline at this stage, and detailed technical information such as the specific make and model of the batteries is not available yet. She confirmed that the form of battery selected will need to satisfy all of the requirements set out in the outline Battery Storage Safety Management Plan. Northamptonshire Fire and Rescue Service is satisfied with the contents of the outline Battery Storage Safety Management Plan and has entered into a Statement of Common Ground with the Applicant **[REP2-063]**.

1.2.8 Ms Brodrick addressed the potential future requirement for environmental permits for battery energy storage systems, noting that while such permits are not currently required, there is nothing within the draft Development Consent Order that would restrict or circumvent the need to obtain any necessary permits in the future.

1.2.9 She further confirmed that the Applicant has received information from NESO confirming that the solar component of the Scheme has received an agreement to vary the existing connection agreement, to move it to a Gate 2, Phase 1 connection offer. The grid connection date is expected to be in 2030 or earlier,

however based on NESO's current timeline, this is expected to be notified before the end of September 2026. In relation to the BESS element of the Scheme, Ms Brodrick confirmed that an agreement to vary has also been received, moving it to a Gate 1 connection. This is the same for other BESS associated with NSIP schemes and standalone BESS projects. The indicative connection date for the BESS has not yet been confirmed, but is expected in 2027 after Gate 2 offers have been sent out.

1.2.10 Responding to questions on night-time working, Ms Brodrick explained that the ability to undertake night-time works needs to be retained in circumstances where overnight working would reduce impacts, such as those associated with road closures, or where works, once commenced, need to continue without interruption.

1.2.11 With regard to the decommissioning of cabling, Ms Brodrick confirmed that the precise form of decommissioning would be determined at the point of decommissioning, and whatever legal and industry guidance is applicable at that point in time would need to be complied with. A final decommissioning plan must be submitted for approval, and that plan will specify the type of decommissioning that needs to be undertaken.

1.2.12 Ms Brodrick concluded by confirming that any remaining points would be addressed in writing by the Applicant.

2 Summary of Matters Raised in Oral Submissions at Open Floor Hearing 3 and the Applicant's Responses

2.1 Philip Mason

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
PM-001	Ecology and Biodiversity	Site boundary	Philip Mason, counsellor for Grendon Parish Council, objects to the proposal on behalf of the Council and residents, on the basis that its close proximity to the Upper Nene Valley Gravel Pits SPA and the Nene Valley Ramsar site would place those designated sites at risk. Mr Mason stated that there is no meaningful separation between the development and the protected wetlands, and contended that significant effects have been identified in a number of respects, including disturbance to bird species during construction and operation, as well as habitat fragmentation, loss of functionally linked land, airborne and waterborne pollution, surface water runoff and the spread of invasive and non-native species.	Impacts on the Upper Nene Valley Gravel Pits SPA and Ramsar site have been fully assessed in the **Habitat Regulations Assessment (Revision B) [REP5-079]**. Whilst likely significant effects are possible and are scoped into the assessment, the subsequent Appropriate Assessment concludes that, with the adoption of the specified mitigation measures, no adverse effects on integrity are likely. The Applicant would clarify that the closest developed area within the Order Limits (in Field BESS 2) lies approximately 320m from the SPA and Ramsar site at its closest point.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
PM-002	Flood Risk and Drainage	Site boundary	Philip Mason expressed concern about the risk of polluted surface water entering the wetland system, and whether drainage and pollution control measures would operate effectively during flood events. Flood conditions increase the risk of control measures failing, which could allow pollutants to be carried towards the SPA.	The Applicant notes the concern regarding the operation of drainage and pollution control measures during flood conditions and the potential for contaminated runoff to reach adjacent wetlands. Flood risk and drainage for the Scheme are assessed in **ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C]**, with supporting detail provided in the Flood Risk Assessment and Drainage Strategy suite. The assessment considers fluvial flood extents, surface water runoff and potential pollution pathways. Drainage systems serving impermeable infrastructure, including substations and BESS, are designed as sealed and isolatable systems. In the event of an incident, isolation mechanisms prevent discharge to the wider drainage network and enable containment of potentially contaminated water within the system. These systems are not reliant on uncontrolled discharge and are designed to operate during flood conditions, including where downstream water levels are elevated. Construction phase risks, including sediment-laden runoff and pollution, are controlled through the **Outline Construction Environmental**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Management Plan [EX6/GH7.1_C], secured through the **Draft Development Consent Order [EX6/GH3.1_E]**, ensuring that appropriate measures are in place during periods of heavy rainfall. On that basis, the hydrology and drainage assessment does not identify a credible pathway by which contaminated surface water would enter adjacent wetlands during flood events.
PM-03	Ecology and Biodiversity	Site boundary	Mr Mason also questioned the adequacy of the bird surveys undertaken and stated that it is unclear whether suitable replacement habitat would be available before any loss or disturbance occurs. Water vole have also been reintroduced into the Nene wetlands but have not been included in the environmental report.	The scope of bird surveys has been agreed with Natural England and with all relevant Local Planning Authority Ecologists, as per the latest versions of the Statements of Common Ground. Provision of replacement habitat has been clarified in the **Outline Ecological Protection and Mitigation Strategy [EX6/GH7.5_D]**. The reintroduction of water vole to the Nene wetlands is understood to have taken place after the completion of baseline surveys and production of associated environmental reports. Nonetheless, the **Environmental Statement Appendix 9.7 Otter and Water Vole Surveys [REP1-049]** already assumes water vole presence at Green Hill BESS and Green Hill E (the sites in closest proximity to the Nene wetlands where water vole reintroduction has occurred), on a precautionary basis. This reintroduction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				therefore does not change the outcome of the environmental assessment provided in **Environmental Statement Chapter 9 Ecology and Biodiversity [EX6/GH6.2.9_B]** in relation to water voles.
PM-004	Environment	Site boundary	He further raised concerns that cumulative impacts, particularly in relation to disturbance, hydrology and pollution, have not been fully resolved and, given the proximity of the development to internationally protected wetlands, considered that the project carries an inherently high risk of harm.	Cumulative impacts on the Upper Nene Valley Gravel Pits SPA and Ramsar site have been fully assessed in the **Habitat Regulations Assessment (Revision B) [REP5-079]**. Whilst likely significant cumulative effects are possible and are scoped into the assessment, the subsequent Appropriate Assessment concludes that, with the adoption of the specified mitigation measures, no cumulative adverse effects on integrity are likely.
PM-05	Traffic	Site boundary	Mr Mason expressed concern about the proposed compound site at Yardley Road, Grendon, and the expected increase in traffic associated with the development.	As outlined in the **Transport and Access Routes Supporting Document [REP1-167]** Construction Compound 4 is located within the cable corridor route just to the north of Yardley Road. HGVs will access Construction Compound 4 via the A45, Grendon Road, Station Road and access CR18, routing along the cable corridor haul route to the compound. No HGVs would turn into or out of CR19/CR20 on Yardley Road. HGVs would only be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				permitted to cross Yardley Road between CR19 and CR20. Construction workers would be able to access Construction Compound 4 from Yardley Road via CR19. These movements would be via cars/vans/shuttlebuses and would be concentrated at the start and the end of the working shift. However, these movements will be managed (secured by the **outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C]**. Access from Yardley Road will be used as a crossing point for the use of cable route construction traffic and is to be controlled by temporary traffic measures (such as stop/go boards) or banksmen to ensure HGVs are held back from crossing when non-vehicular traffic is present. These measures are secured by Requirement 15 of Schedule 2 to the **Draft DCO Revision E [EX6/GH3.1_E]**. Movements across Yardley Road between fields will be low in number and managed through traffic management schemes as the flexibility defined in the works plans allow. An assessment of road traffic effects during the construction phase upon users of then highway network has been undertaken as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				part of the **ES Chapter 13 Transport and Access [REP2-003]**. The **Outline Construction Traffic Management Plan Revision C [EX6/GH7.9_C]** (OCTMP) provides a framework for the management of construction vehicle movements to and from the Scheme. It will ensure that the effects of the construction phase are minimised. The OCTMP sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. The detailed CTMP, to be approved by the relevant planning authority, is secured in Schedule 2, Requirement 15 of the **Draft DCO Revision E [EX6/GH3.1_E]**.

2.2 Stewart Andrew MP

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SA-001	Alternatives and Design Evolution	Alternative locations	Stewart Andrew, MP for Daventry, expressed concern that the proposed development would involve the use of best and most versatile agricultural land, asserting that a substantial proportion of the site falls within BMV classifications and would therefore risk the long-term loss of productive farmland across a large rural area, together with irreversible changes to soil quality arising from construction activities, cable installation and eventual decommissioning. He stated that the proposal does not align with national policy objectives aimed at safeguarding high-quality agricultural land for future food production.	Paragraph 6.16.4 of the **Planning Statement [EX6/ GH7.15_C]** sets out how National Policy Statement EN-1, at paragraph 5.11.34, makes clear that applicants must provide justification if schemes are proposed to be located on best and most versatile agricultural land. This justification has been provided by the Applicant in **ES Chapter 5: Alternatives and Design Evolution [APP-042]** and **ES Appendix 5.1: Site Selection Assessment Revision A [REP1-037]**. Please refer to responses to SGHS-001 to SGHS-006 of the **Applicant's Response to Stop Green Hill Solar [REP4-021]** in regard to the site selection process. The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within **ES Appendix 5.1 Site Selection Assessment Revision A [REP1-037]**. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				As Stated in **ES Chapter 20: Agricultural Circumstances [APP-057],** 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. The **Farming Report [APP-571]** sets out 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. Due to the large extent of Grade 2 and Grade 3 agricultural land within the 20km search area and in order to focus the search on available land, land agents were contacted regarding potentially willing landowners within the area.

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				NPS EN-3 does not prohibit the use of BMV land and recognises that NSIP scale solar schemes are likely to include some agricultural land, with the preference being to prioritise poorer quality land. To deliver the proposed capacity for the Scheme, it was therefore considered likely that a significant percentage of BMV land would be required. EN-3 states at paragraph 2.10.29 that applicants should avoid the use of BMV 'where possible', and this is what the Applicant sought to do in its site selection process. Therefore, the use of BMV land has been justified and any losses minimised where reasonably possible. An assessment of potential impacts of the Scheme on agricultural circumstances is outlined in both the **Environmental Statement Chapter 20 Agricultural Circumstances [APP-057]** and the **Farming Report [APP-571]**. An **outline Soil Management Plan [EX6/GH7.6_A]** has been prepared to set out the soil management strategy, approach and key

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				measures during construction, operation and decommissioning stages as secured in Schedule 2, Requirement 19 of the **Draft DCO Revision E [EX6/3.1_E].** The land will be returned to the landowners after decommissioning of the Scheme, allowing a return of arable management of the land. Whilst there is no obligation for the landowners to return the land to arable production, just as at present there is no obligation to maintain arable management, the Applicant must comply with a Soils Management Plan approved under Requirement 19 of Schedule 2 to the **Draft DCO Revision E [EX6/GH3.1_E]** which will ensure the quality of the soil is not degraded, and will likely be improved, during the operation of the Scheme. This approach is consistent with paragraph 2.10.34 of NPS EN-3. Please refer to the response to AGR-002 in the Applicant's Responses to **Written Representations at Deadline 1 [REP2-048]** and AGR-002 of the **Applicant Responses to**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Relevant Representations [REP1-161] in regard to food security.
SA-002	Scale and location	Alternative locations	Mr Andrew raised concerns regarding the inappropriate scale and location of the development, noting that its dispersed nature risks creating a perception of encirclement by industrial-scale energy infrastructure. In this context, he questioned compliance with the design principles set out in the National Policy Statement for Energy (EN-1), and stated that he did not consider the development to be sensitively located or proportionate to its surroundings, and noted the strong public support for expanding solar deployment on warehouses and brownfield land. Mr Andrew asserted that the application documentation provides limited evidence of a detailed sequential site assessment.	Environmental Statement **Chapter 5: Alternatives and Design Evolution of the ES [APP-042]** and **ES Appendix 5.1 Site Selection Assessment of the Environmental Statement Revision [REP1-037]** outline the approach to site selection undertaken by the Applicant. Please refer to responses to SGHS-001 to SGHS-006 of the **Applicant's Response to Stop Green Hill Solar [REP4-021]** in regard to the site selection process. The Applicant sets out a full planning policy appraisal in the **Planning Statement [EX6/GH7.15_C].** The **Policy Compliance Document [REP4-014]** provides a comprehensive assessment of how the Scheme accords with relevant national and local planning policy. The Applicant sets out its consideration against NPS EN-3 outlines key influencing factors for site selection and design within Section 5.6 of Environmental

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Statement **Chapter 5: Alternatives and Design Evolution [APP-042]**. In regard to the dispersed nature of the Scheme, it is considered that the provision of a solar scheme with discrete areas of land can offer a more favourable approach than having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. Please refer to response to SGHS-002 of the **Applicant's Further Response to Deadline 4 Submissions [EX6/GH8.1.39]** in regard to the consideration of dispersed sites. 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. The design development of the Scheme recognises the need for careful siting, design and mitigation,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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. The use of previously developed (brownfield) land and commercial roof tops was considered. There was no brownfield land that met the minimum individual site size threshold nor the area of approximately 1,100 ha required for a network of sites in proximity for the Scheme, identified within the 20km search area from the Grendon Substation Point of Connection. The Applicant also addresses brownfield and rooftop developments in Section 7.3 of the **Statement of Need [APP-556]**, in particular the constraints and limitations of rooftop solar and the benefits of transmission grid connected solar.
SA-003	Landscape and environment	General concerns about landscape	He also raised concerns relating to landscape character, heritage assets, biodiversity and environmental risk, warning that	The **LVIA [APP-045]** takes into account the effects on landscape character and visual amenity in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		and environmental effects	the formation of highly visible clusters would result in a substantial change to the visual character of the countryside	detail, and acknowledges that 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 note **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]** where this is discussed.
SA-004	Cultural Heritage	WW2 military aircraft crash site	Reference was made to a Second World War aircraft crash site near Mears Ashby, which he noted may fall under the protection of the Military Remains Act 1986.	In respect of the historic WWII crash sites, the Northamptonshire HER records the location of these within Fields EF9 and EF26 within the Scheme. No development is proposed within the Fields EF9 and EF26 where WW2 crash sites are recorded within Site E. The Applicant is therefore confident that there is no potential for impacts to these historic crash sites. In regard to the potential crash site within Field GF1, a license has been obtained by the Joint Casualty and Compassionate Centre (JCCC).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				As outlined in the **Consents and Agreements Position Statement (Revision B) [REP5-077]** the Applicant was granted a licence on the 10th February 2026. The licence was applied for a precautionary approach and will be kept in place for the duration of the construction of the Scheme. In the event crash remains are found, they must be treated in accordance with the terms of the licence.
SA-005	Environment	Character of local area	Mr Andrew expressed concern about environmental impacts associated with hedgerow removal and vegetation clearance, as well as the potential loss of jobs, including farming and livery, which he considered could threaten the established character of the area.	Please see response to SA-003 above. Details on the extents of hedgerow losses anticipated to facilitate access for the construction and operation of the Scheme are provided in Section 1.2: Approach to Construction and Maintenance Access Gaps at Hedgerows of the **Outline Landscape and Ecological Management Plan [EX6/GH7.4_E].** This approach to hedgerow removal will be secured through Requirement 7 of the **Draft DCO Revision E [EX6/GH3.1_E]** and finalised in the detailed Landscape and Ecological Management Plan post consent.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
SA-006	Environment	Decommissioning and scheme funding	Mr Andrew questioned the proposed lifespan of 60 years, noting that this exceeds the typical lifespan of solar panel technology and raises concerns regarding the long-term environmental impacts of panel replacement and disposal. He stated that many residents feel the social and community value of these landscapes has not been adequately considered. He also raised concern that, should the project become economically unviable in the future, the development could be abandoned, resulting in permanent degradation of the land, potential reclassification as brownfield, and eventual redevelopment for housing.	The Environmental Statement assesses the likely effects of the Scheme during construction, operation, operational replacement and decommissioning with respect to landscape character and visual impacts in **ES Chapter 8: Landscape and Visual Impact [APP-045]** and in respect of social and community value in **ES Chapter 18: Human Health [APP-055]**. The proposed maximum 60-year operational period is not uncommon, several consented solar DCO projects provide for the same timescales including the Mallard Pass Solar Farm; Cottam Solar Project; West Burton Solar Project; Gate Burton Energy Park; and Tillbridge Solar Project. A 60-year operational period has been fully assessed in the Environmental Statement. **ES Chapter 8: Landscape and Visual Impact [APP-045]** has undertaken a robust assessment of the sensitivity of landscape receptors. The judgement on landscape sensitivity is based on consideration of both the landscape

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				receptor's value and its susceptibility to change arising from the Scheme. Details on how landscape value and susceptibility have been assessed are set out within the **ES Appendix 8.1: LVIA Methodology (Revision B) [EX6/GH6.3.8.1_B]**. **ES Appendix 8.3: LVIA Assessment Sheets (Revision A) [REP1-041]** at Section 8.3.2.2, sets out an assessment of the Value, Susceptibility and Sensitivity for Landscape Character for each of the individual Sites within the Scheme within each of the 3 Study Areas. This approach has allowed for the individual characteristics and local variation that are present within the landscape in and around each of the individual Sites to be fully accounted for within the assessment of Landscape Sensitivity. The assessment of 'Community Identity, Culture, Resilience and Influence' in **ES Chapter 18: Human Health [APP-055]** relied on the assessment findings in the LVIA, to consider the extent to which social and community perceptions of changes to their rural character and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				connection to the landscape are likely to be affected by the Scheme, and the resultant effect on social and community wellbeing. Whilst the assessment identifies a long-term adverse effect to communities, it is not anticipated to be a significant effect to health and wellbeing. Upon decommissioning each Site will be restored to its current use and returned to the landowner. 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 approved plan. Failure to comply with this requirement is a criminal offence. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				considers that Requirement 21 complies with paragraphs 2.10.146 to 2.10.148 of NPS EN-3. Please also refer to the Applicants response to Q2.1.10 within the **Applicant's Response to ExA Second Written Questions [REP3-074]** in regard to decommissioning.
SA-007	Transport and Access	Construction impacts	Mr Andrew highlighted concerns regarding impacts including increased road safety risks, noise pollution, damage to local road infrastructure and disruption to daily life, as well as disruption to local access and recreation along well-used routes within or adjacent to the proposed sites, which he considered could reduce amenity value and alter the rural experience.	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, this includes changes in views and visual amenity for road users.

2.3 Sarah Bool MP

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SB-001	General	General concerns regarding the scheme	Sarah Bool MP, acting in her capacity as Member of Parliament for South Northamptonshire, expressed concern that the designation of the proposal as a Nationally Significant Infrastructure Project removes decision-making power from local communities. Ms Bool questioned, with reference to section 104 of the Planning Act 2008 and National Policy Statements EN-1 and EN-3, whether this particular scheme meets the expectations set out in national policy, whether the adverse impacts of the proposed development would outweigh its stated benefits and whether the mitigations measures required by NPS EN-1 have been appropriately addressed.	The Applicant sets out a full planning policy appraisal in the **Planning Statement [EX6/GH7.15_C].** The **Policy Compliance Document [REP4-014]** provides a comprehensive assessment of how the Scheme accords with relevant national and local planning policy. Section 7.1 of the Planning Statement outlines compliance with Planning Act 2008 design making requirements. Section 7.2 sets out the planning balance. The Planning Statement concludes by acknowledging that whilst it has not been possible to avoid all impacts, these have been minimised, where practicable, 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 infrastructure policy requires that residual impacts are outweighed by the urgent need.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SB-002	Scale and location	Alternative locations	Ms Bool raised concerns regarding the size and fragmented nature of the scheme, noting that it comprises nine separate sites connected by approximately 31 kilometres of cabling. Mrs Bool questioned whether the evidence provided by the Applicant to date is sufficient to justify this level of fragmentation, and whether such fragmentation is genuinely unavoidable rather than a matter of convenience for land assembly, and whether it makes efficient use of land. The structure makes it easy for harm to be assessed piecemeal. She also expressed concern about effects on landscape character, visual amenity and the encirclement of Easton Maudit, asserting that the proposal would result in the spatial enclosure of a historic village. She referred to the Grade I listed church and Grade II listed buildings within Easton Maudit, and queried whether the relevant tests have been properly met where these heritage assets would be effectively "surrounded" for a minimum period of 60 years.	**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 (less than substantial harm in NPPF terms) would occur as a results of the Scheme on Easton Maudit Conservation Area and the Church of St Peter and St Paul (NHLE:1189610) (see **ES Appendix 12.9 Cultural Heritage Impact Assessment Tables [APP-149]**). The heritage methodology and assessment are agreed with North Northamptonshire under items CH-01, CH-02 and CH-04 of the North Northamptonshire Statement of Common Ground **[REP5-098]**. Paragraph 5.9.33 of the Overarching National Policy Statement for Energy (EN-1) acknowledges '*where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				appropriate securing its optimum viable use'. The Applicant's position is that the benefits of the Scheme outweigh the less than substantial harm.
SB-003	Alternatives and Design Evolution	Alternative locations	In relation to agricultural land, she noted that approximately 65% of the Scheme would affect best and most versatile land, with particularly high proportions at certain sites, including Site D where 90.2% is classified as BMV. Mrs Bool asserted that the scheme does not adequately seek to minimise the use of BMV land.	Please refer to response to response to SA-001 above in regard to the use of agricultural land.
SB-004	Consent Order	Decommissioning and scheme funding	Mrs Bool further noted that a typical operational period for such development is around 40 years and questioned the justification for a proposed lifespan of 60 years. She stated that there appears to be no guaranteed mechanism to secure decommissioning funding irrespective of ownership and queried whether there is an adequate and enforceable mechanism to ensure that decommissioning would be credible over a 60-year period.	Please refer to response to SA-006 above in regard to the requirement for decommissioning. It is noted that the Applicant has entered into voluntary agreements with the landowners where the solar PV panels are located. As part of the lease arrangements, there are measures requiring the Applicant to put in place decommissioning security for the benefit of those landowners. This protects the landowner should decommissioning not take place.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SB-005	Scale and location	Alternative locations	Mrs Bool also raised concerns regarding the proposed 500 MW battery energy storage system, questioning whether the scale and concentration of such infrastructure is acceptable in this location. She queried safety considerations, given the proximity to sensitive receptors and watercourses, and noted that part of the site is located adjacent to a Site of Special Scientific Interest.	The **Outline Battery Safety Management Plan (OBSSMP) Revision B [REP5-075]** provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. The purpose of this OBSSMP is to identify how the Applicant will use good industry practice to both prevent and reduce risk to life, property, and the environment from a BESS failure event. The **ES Appendix 10.1: Flood Risk Assessment and Drainage Strategy [REP5-021]** secures drainage and pollution prevention principles containment which focus on the isolation and prevention of contaminant discharge. These principles have been discussed and the approach agreed with the Environment Agency which is formally agreed through the **Statement of Common Ground [EX6/GH8.3.5_C]**. The Applicant will implement good practice management and mitigation measures to minimise pollution risk, as detailed in the **Outline Construction Environmental**

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				Management Plan (Revision B) [EX6/GH7.1_C], Outline Operational Environmental Management Plan (Revision C) [EX6/GH7.2_D] and Outline Battery Storage Safety Management Plan (Revision B) [REP5-075] which are secured through Schedule 2 of the **draft DCO [EX6/GH3.1_E]**. The Applicant also refers to the signed Statement of Common Ground with the Northampton Fire and Rescue Service **[REP2-063]** which confirms all matters are agreed. Please refer to the response to SBMP-004 of **The Applicant's Responses to Relevant Representations [REP1-161]** in regard to the consideration of pollution risks to ecological receptors.
SB-006	General	Impact to the local environment and community	She expressed concern about cumulative impacts on the environment, the local economy and the community as a whole, and questioned whether the Applicant has sufficiently complied with requirements relating to alternatives	Environmental Statement **Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** considers aspects such as population characteristics, economic

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			and design, and whether the chosen approach has been adequately justified. Secondly, Mrs Bool returned to the issue of Easton Maudit and heritage impacts, questioning whether harm to the character of the settlement has been effectively minimised.	activity, tourism and agricultural sectors. Please refer to the response to SA-001 above in regard to site selection. Please also refer to the response to SB-002 above in regard to the heritage assessment.
SBL-007	Alternatives and Design Evolution	Alternative locations	Mrs Bool reiterated concerns regarding best and most versatile agricultural land, querying whether sufficient weight has been given to the scale of BMV land loss and whether avoidance and minimisation have been adequately demonstrated. She asserted that the Scheme contradicts the National Policy Statements.	Please refer to response to response to SA-001 above in regard to the use of agricultural land.

2.4 Trevor Higgs

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
TH-001	Transport and Access	Public rights of way	Trevor Higgs, a footpath warden for Grendon Walking Group, expressed concern about the impact of the Scheme on public rights of way, particularly the changes that would be required to existing routes. He stated that the Scheme would ruin these routes and their amenity value, asserting that they would be overshadowed by an industrial landscape. Mr Higgs contended that the proposal would have a catastrophic impact on public rights of way across all of the sites and maintained that no amount of mitigation could adequately compensate for the resulting loss.	The **ES Chapter 8: Landscape and Visual Impact [APP-045]** takes into account the effects on landscape character and visual amenity in detail, and acknowledges that 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. Following the implementation of the appropriate site-specific mitigation measures including offsets and mitigation planting, the residual effects on the following PRoW receptors are determined to remain Significant Adverse for the duration of the Scheme: NN|TU|3 (TP091) at Site E, NN|TA|4#1 (TP181) at Site F, and NN|TD|2 (TP184) at Site F. The assessment in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and its supporting **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]** has assessed the impacts on each individual PROW likely to be affected by the Scheme. This has considered impacts on amenity,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				accessibility, impacts from onsite works, diversions or closures, and mitigation measures to protect the safe use of PROW users. The assessment finds no residual significant effects to any PROW at any phase of the Scheme.
TH-002	Scale and location	Alternative locations	Mr Higgs further expressed the view that scant regard has been given to alternative options, such as the use of new-build house roofs, and queried why these particular areas have been selected for development.	Environmental Statement **Chapter 5: Alternatives and Design Evolution of the ES [APP-042]** and **ES Appendix 5.1 Site Selection Assessment of the Environmental Statement Revision [REP1-037]** outline the approach to site selection undertaken by the Applicant. The use of previously developed (brownfield) land and commercial roof tops was considered. There was no brownfield land that met the minimum individual site size threshold nor the area of approximately 1,100 ha required for a network of sites in proximity for the Scheme, identified within the 20km search area from the Grendon Substation Point of Connection. The Applicant also addresses brownfield and rooftop developments in Section 7.3 of the **Statement of Need [APP-556]**, in particular the constraints and limitations of rooftop solar and the benefits of transmission grid connected solar.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
TH-003	General	General concerns regarding the scheme	He also raised concerns regarding public consultation, stating that only one public consultation had been undertaken and describing this as appalling given the size and scale of the scheme.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. **Consultation Report Revision A [REP1-017]** details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. Section 4 of **Consultation Report Revision A [REP1-017]** describes the Applicant's approach to non-statutory consultation, including early engagement meetings and five Early Engagement Workshops where community groups, local council and parishes were invited to share their insights on early design ideas. Copies of the materials presented at the Early Engagement Workshops were subsequently uploaded onto the Scheme's website for the local community to review. Section 7 of the **Consultation Report Revision A [REP1- 017]** details the Applicant's approach to the second stage of the consultation, comprising four in-person exhibitions and three webinars, where community groups,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				local councillors and parishes were invited to share their feedback on the Schemes proposals. To ensure the consultation remained accessible to those who could not attend the in-person exhibitions, the Applicant provided consultation materials and a recording of the webinar on the Scheme's website.

2.5 Brian Skittrall

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
Comments on behalf of Bozeat Parish Council				
BS-001	Transport and Access	Construction impacts on local village	Brian Skittrall requested clearer justification for the proposed construction route through Bozeat village and stated that he would like this route to be removed from the Scheme altogether.	Please refer to the response provided to BPC-001 in **Applicant's Further Response to Deadline 4 [EX6/GH8.1.39]** Submissions. The route choice for HGVs has sought to avoid the most sensitive routes and has been established through consultation with the highway authorities. An assessment of construction traffic and consideration of effects is provided in the **ES Chapter 13 Transport and Access [REP2-077].** The Abnormal Indivisible Loads (AIL) Routes have been proposed by Wynns, a consulting engineering firm specialising in the transportation of AILs. The AIL Assessment is included as Appendix D of the **Transport Assessment Parts 2 and 3 [REP3-038] and [REP3-040]**. This demonstrates that the proposed routes are able to accommodate the size of AIL movements required at each location.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
Comments on behalf of CPRE Northamptonshire and Bozeat Parish Council				
BS-002	Consent Order	Decommissioning and Scheme funding	Mr Skittrall also raised concerns regarding the security of funding for decommissioning, noting what he described as a reluctance on the part of the Applicant to have a financial agreement for decommissioning secured through the Development Consent Order. Mr Skittrall expressed concern that this creates a high risk that sufficient funds may not be available at the end of the project to ensure proper decommissioning. In addition, he raised concerns in relation to the proposed community benefit fund, noting that the Applicant does not wish for this to be secured through the DCO. Mr Skittrall strongly requested that provision for the community benefit fund be formally tied into the Development Consent Order.	Please refer to the response to SA-006 above in regard to the decommissioning requirement. The Community Benefit Fund sits separately from the DCO process and will provide funding for local organisations and/or initiatives based on feedback received from the community, both as part of the pre-application consultation and on an ongoing basis if the Scheme is approved and the fund begins operations. The Community Benefit Fund cannot be taken into consideration by the Examining Authority or the Secretary of State when considering the DCO Application. This was confirmed in the consultation on the Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure Working Paper that was carried out last year, where the Government stated that "*It is critical the planning process remains a robust system through which communities can continue to have a say on any proposals in their area. That is why community benefits are legally*

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent."[1] Whilst there consultation considered proposals to make the Community Benefit Fund mandatory, this is not yet the case, and the Fund continues to be wholly separate from the DCO and planning process. Please refer to the Applicant's response to NNC-085 of **Applicant Responses to Relevant Representations document [REP1-161]** for details relating to community benefits.

[1] https://assets.publishing.service.gov.uk/media/682b5647010c5c28d1c7e7ff/community-benefits-and-shared-ownership-working-paper.pdf

2.6 Linda Twohey

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
LT-001	Scale and location	Alternative locations	Dr Linda Twohey noted on behalf of Stop Greenhill Solar that the Applicant has included the removal of panels from Area AF29 within Change Request 2. She asserted that the development should be removed from Field AF9 and raised concerns about the proposed construction access to Fields AF2, AF3 and AF4. Dr Twohey observed that the area of panels proposed within AF9 represents approximately 2% of the total within Site A and therefore proposed that AF9 be removed from use as part of the solar array. Dr Twohey raised specific concerns regarding the proposed access route for the construction of the solar array within Fields AF2, AF3 and AF4. She noted that while a length of Broughton Road falls within the Order Limits, the access track does not appear to connect either to Broughton Road or eastwards to Newland Road, and she queried how construction vehicles are expected to access Fields AF2, AF3 and AF4. She further stated that, if the Applicant intends construction access to Fields AF2 to	As outlined in the **Transport and Access Routes Supporting Document [REP1-167]**, construction access to Green Hill A will be via Access A-1 off Broughton Road. The majority of Green Hill A lies to the east of Newland Road and will be accessed directly from Access A-1. Internal access tracks will distribute construction traffic within this area. A smaller section of the Site lies to the west of Newland Road. This part of the Site (including fields AF2, AF3 and AF4) will be accessed from Broughton Road via Access A-1, with vehicles routed along internal haul roads and crossing Newland Road at designated crossing points (A-1 East and A-1 West). These crossings will be used solely to enable access to the west of Newland Road. Crossing movements will be limited and managed by banksmen. Fields AF2 to AF4 will be accessed via internal tracks from Access A-1 (West), and an existing bridge over the stream will be utilised to connect Field AF9. During construction, vehicles accessing the western area will enter from

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			AF4 to be achieved by crossing Newland Road, this would necessitate the creation of an access route across an ecologically valuable watercourse. Dr Twohey asked the Applicant to address this issue directly and to state clearly which access route is intended for the construction of the solar arrays within Fields AF2, AF3 and AF4. She noted that, if access were instead taken from Broughton Road, there would be no need for crossing points on Newland Road. She highlighted the ecological benefits of such an approach, including the avoidance of removing two sections of important hedgerows, preventing disturbance to skylark territories, and maintaining the tranquillity of Newland Road. Dr Twohey concluded by requesting that the Examining Authority recognise the benefits of the proposal to remove AF9 from the development.	Broughton Road and travel via internal tracks to the crossing point. The types of vehicles using the crossing may include HGVs, LGVs, cars and shuttle buses. Access A-2, Broughton Road, is proposed for operational use only and will not be used during construction. This reduces the risk of disturbance to skylarks within AF1, which will be retained as a mitigation field.

2.7 Kay Brown

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KB-001	General	Community impact	Kay Brown, resident of Mears Ashby and member of Stop Greenhill Solar, raised concerns regarding the role of large landowners who have agreed to their land being used for the proposed development. She noted that a number of local residents live in rented accommodation owned by such landowners and may feel unable to speak out against the scheme for fear that doing so could jeopardise their livelihood or housing security. She noted that there is no evidence to suggest this has happened, but stated that she wished to bring this issue to the attention of the Examining Authority and recommended that the Inspectors review representations [REP1-204] and [REP1-203], which she said highlight local concerns about the industrialisation of the landscape and the closure of ancient and attractive public rights of way. Ms Brown also expressed concerns about the impacts to public rights of way TD-9, TD-5, TD-7 and adjacent to fields FF28 to 32. The footpath running alongside EF33 would be an enclosed corridor with high fencing, as will the path between EF13/14 and EF22.	The Applicant notes the concerns raised regarding the relationship between landowners and tenants and the potential for perceived constraints on individuals expressing their views. The Applicant notes that feedback has been received from a wide range of people living and working in the vicinity of the Scheme and it has not been made aware of any concerns that people felt restricted in the feedback they could provide. The Applicant notes the references to representations **[REP1-204]** and **[REP1-203]**. The Applicant has responded to matters raised in those submissions within the **Applicant's Responses to Deadline 1 Submissions [REP2-050]**. The assessment in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and its supporting **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]** has assessed the impacts on each individual PROW likely to be affected by the Scheme. Footpaths NN|TD|5 and NN|TD|7 directly interact with Green Hill F,

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			She indicated that the path between Grendon and Castle Ashby will be completely removed for a period of two years, other than the exception made for the Waendel Walk. She noted that this route is currently the only available path for local residents to walk to nearby amenities and raised concerns about the impact this would have on daily life and accessibility.	while bridleway NN|TD|9 is crossed by the Cable Route Corridor. Adjacent to fields FF28 to 32 the layout provides a minimum offset of 15m from the PRoW to the proposed fenceline creating a wide corridor for users of the footpath to move along. Alongside FF29 proposed woodland planting has been included to augment the existing planting along this section of footpath providing separation for users from the array within FF29. Along the eastern edge of FF32, the PRoW has been offset by a minimum of 15m to the proposed fenceline. A new native hedgerow has been included outside of the fenceline to help provide screening of the array beyond. Each route in this area (NN|TD|5, NN|TD|7, NN|TD|8, and NN|TD|9) is anticipated to experience a moderate-minor adverse effect during construction due to construction activities on or adjacent to the PROW. The long-term effect during operation is anticipated to be minor adverse as a result of embedded landscaping screening mitigation, and the enhancement of connectivity through permissive paths. None of these are significant adverse effects. Mitigation and enhancement measures are secured

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				through the **Outline LEMP [EX6/GH7.4_E]** and **Outline PROWPPMP [EX6/GH7.10_C]** by Requirements 7 and 18 respectively in Schedule 2 to the **Draft DCO [EX6/GH3.1_E]**. There is no PRoW running directly alongside EF33. The Applicant considers that this may instead relate to EF34, which includes the existing PRoW (NN|TN|1). The Applicant confirms that the field has been identified as 'Proposed Ground Nesting Bird Mitigation – Set Aside' and is not proposed to include solar panels. Within field EF33 the Applicant proposes a permissive footpath to connect NN|TN|1, NN|TN|2, and the roadside footpath from Washbrook Lane to Earls Barton. This will be set in a tussock grassland margin of approximately 24-25 m wide between proposed hedgerow planting to one side and the Solar PV Array fenceline to the other. There is no PRoW running directly alongside EF13/14 or EF22, however the Applicant is proposing to formalise a permissive path on this route and understands is already used by the public.

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				This route is formed by a field access track bound by hedges and a low wall and fence. The Applicant proposed enhanced hedgerow planting to be planted on the outside of the existing features to screen the Scheme, with the fence lines located 15 m from the existing boundary features and hedgerows. The Applicant is therefore confident that no additional sense of enclosure would be experienced between fields EF13 and EF22. The Applicant has responded to comments made at Issue Specific Hearing 5 in relation to NN|TF|4 footpath from Grendon to Castle Ashby and refers to Agenda item 3.4 in **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 5 [EX6/GH8.1.44]**. This route has not been identified as part of the routes used by the International Waendel Walk event, however, if applicable during construction, the specific measures to make the Scheme secure to protect event attendees as set out in the **Outline CEMP [EX6/GH7.1_C]** and **Outline PROWPPMP [EX6/GH7.10_C]** will apply.

2.8 Tim Graham

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
TG-001	Consent Order	Decommissioning and scheme funding	Tim Graham, a member of Mears Ashby Parish Council, requested more specific detail regarding the proposed decommissioning of the development in 40 to 60 years' time. In particular, he asked what would become of the underground cables, the BESS and concrete foundations. He queried how decommissioning would be undertaken in practice, including the intended disposal methods and whether any decontamination would be required prior to disposal, such as landfill or other treatment processes. He also expressed concern about the potential for deliberate bankruptcy in the future, which he suggested could result in the financial burden of decommissioning being transferred to taxpayers. Mr Graham stated that he would wish to see a financial bond secured for decommissioning, held in trust by an officially approved third party within a UK bank.	Section 4.7 of **Chapter 4: Scheme Description [EX6/GH6.2.4_B]** provides an overview of the decommissioning phase, which is expected to take between 12 and 24 months. The Solar Array Works Area and related components, substations, BESS and all associated works (with the exception of the cable ducts) will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. The underground cable, cable ducts and joint bays will be decommissioned in accordance with the applicable guidance and regulations at the time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular interval and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				open up the entire length of the cable route. The decommissioning of the Scheme will be secured through the **Outline Decommissioning Statement (ODS) [EX6/GH7.3_C]**. A detailed Decommissioning Plan, including timescales and transport arrangements, will be prepared in accordance with the ODS and secured by a Requirement in the **draft DCO [EX6/GH3.1_E]**, to be approved by the relevant planning authority. Upon decommissioning, each Site will be restored to its current use and returned to the landowner. Post decommissioning, the landowners would choose how the land is to be used and managed, the landowner may return the land to arable use. Please refer to response to SA-006 above in regard to the requirement for decommissioning.

2.9 Bernard Livesey

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
BL-001	Environment	Pollution and Fire Safety	Bernard Livesey represented himself, his wife and villagers of Easton Maudit; he is also a member of Stop Green Hill Solar. Mr Livesey raised concerns regarding the proposed use of lithium batteries at the Grendon battery energy storage site, highlighting the potential risks of thermal runaway, self-combustion and explosion. He also expressed concern about the risk of pollution to the River Nene, the wider Nene Valley and the associated Ramsar site in the event of an incident. Mr Livesey noted that the references listed in the outline Battery Storage Safety Management Plan have not been provided. The plan provides a good explanation of how certain safety measures are designed, but does not	Please refer to the response to PM-001 in regard to the assessment of effects on the Upper Nene Valley Gravel Pits SPA and Ramsar site. The **Outline Ecological Protection and Mitigation Strategy (Revision D) [EX6/GH7.5_D]** and **Outline Construction Environmental Management Plan (Revision C) [EX6/GH7.1_C]** set out measures to control pollution during construction. The Applicant notes the concern regarding the operation of drainage and pollution control measures during flood conditions and the potential for contaminated runoff to reach the River Nene and associated Ramsar Site. Flood risk and drainage for the Scheme are assessed in **ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C],** with supporting detail provided in the Flood Risk Assessment and Drainage Strategy suite. The assessment considers fluvial flood extents, surface water runoff and potential pollution pathways. Drainage systems serving impermeable infrastructure, including substations and BESS, are designed as sealed and isolatable systems. In the event of an incident, isolation mechanisms prevent discharge to the wider drainage network and enable containment of potentially contaminated water within the system. These systems are not reliant on

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			deal with the potential for human failure, and does not recognise that the batteries contain hazardous substances with reference to the Control of Major Hazards Regulations 2015 and the Hazardous Substances Regulations 2015.	uncontrolled discharge and are designed to operate during flood conditions, including where downstream water levels are elevated. Construction-phase risks, including sediment-laden runoff and pollution, are controlled through the **Outline Construction Environmental Management Plan [EX6/GH7.1_C],** secured through the **Draft Development Consent Order Revision E [EX6/GH3.1_E],** ensuring that appropriate measures are in place during periods of heavy rainfall. On that basis, the hydrology and drainage assessment does not identify a credible pathway by which contaminated surface water would enter adjacent wetlands during flood events. In terms of the references in the **Outline Battery Storage Safety Management Plan (OBSSMP) [REP5-075]** the Applicant has provided references in accordance with the Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents which states that all application documents should cite any references to documents relied upon, such as national policy statements or development plans, and include the relevant passages, policies, or sections. It is not standard practice to also provide a copy of every reference document. The Environment Agency (EA) is a statutory consultee for the Scheme and must approve the

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				BESS firewater drainage capture design and final Battery Storage Safety Management Plan (BSSMP). Section 5.3 of the OBSSMP documents how water pollution risks will be fully mitigated. These principles have been discussed and the approach agreed with the Environment Agency which is formally agreed through the Statement of Common Ground **[EX6/GH8.3.5_C].** The Applicant has met all HSE Grid Scale BESS safety requirements for the planning stage and will meet all requirements at the detailed design stage and throughout the BESS lifecycle: https://www.hse.gov.uk/electricity/battery-energy-storage-systems.htm The Control of Major Accident Hazards Regulations 2015 (COMAH) apply to dangerous substances as classified by the Classification, Labelling and Packaging Regulations 2008. Lithium-ion batteries are considered to be articles, rather than substances, and are therefore outside of the scope of the COMAH. The Health and Safety Executive considers that the current regulatory framework is sufficient and suitably robust in relation to lithium-ion batteries and battery energy storage systems.

2.10 Dr Marie Midgley

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
DMM-001	Alternatives and Design Evolution	Alternative locations	Dr Midgley queried whether the Applicant had an agreed connection date with NESO, and whether that included protected status for the BESS. She raised concerns regarding the continued inclusion of fields within the Scheme that no longer contain panels, but are to be wildflower fields despite being best and most versatile agricultural land, for example near Horn Wood. Dr Midgley stated that residents would be safer if those fields were removed from the Scheme altogether, and expressed concern that, rather than being returned to agricultural use, the land could be used for further development in the future.	The Applicant refers to their response to Q3.1.1 in the **Applicant's Responses to ExA Third Written Questions [EX6/GH8.1.38]** on the current position of the grid connection offer for the Scheme. The fields that are located within the Order Limits which do not have infrastructure on them are proposed for landscape and ecological mitigation land 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. These mitigation fields will retain the option of being combined with agricultural use such as grazing, therefore, as with the areas being used for solar infrastructure, there is no loss of best and most versatile land.

2.11 Shena Howell

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
SH-001	Human health	Noise and Vibration	Shena Howell raised questions in relation to noise and vibration impacts, referring to [REP1-168], which states that there may be a need for night-time working and that noise levels at certain receptor points could approach 60 decibels. She noted that 65 decibels is the unsafe limit incurring the need for temporary rehousing, and queried whether, in light of these predicted impacts, the Applicant is planning to rehouse the entire village of Grendon. Noted that 2/3 of the measured receptors around Grendon and BESS register high or medium levels and would require significant mitigation. She requested consent not be given for any nighttime working, and indicated this was not the original intention.	As outlined in paragraph 4.5.23 of ES **Chapter 4:Scheme Description [EX6/GH6.2.4_B]** '*some activities may be required outside of these times (such as the delivery of abnormal loads, night time working for cable construction works in public highways or HDD activities)*'. It is assumed that trenchless crossings may require continuous drilling into the night-time period, as drilling cannot be paused once started until the task is completed. As outlined in the **GH8.4.1 Addendum to Chapter 14: Noise and Vibration [REP1-168]**, based on the expected distance of the HDD launch and receptor pits of a minimum of 80m from residential properties, all receptors were calculated to be 65 dB LAeq,T or below. This is with the exception of CR01 (located along Red House Lane, south of Green Hill A.2) and BESS002 (located along Station Road, north of Green Hill BESS2). Without any additional mitigation, both of these receptors could experience noise levels requiring temporary rehousing to be offered. However, all receptors identified in Table 1.4 as experiencing Medium or High

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				magnitude impacts will receive additional mitigation. Measures to reduce the noise levels at the receptor will be bespoke to each HDD site, but are likely to include a combination of increasing the distance between the HDD activity (e.g. entrance and exit pit) and the receptor, selection of quieter equipment where practicable, and the use of noise reduction measures such as temporary acoustic fencing. Table 1.5 demonstrates the likely effect of just one mitigation measure, the use of an acoustic fence to reduce noise levels, which reliably provide at least a 10dB reduction of noise levels at receptors. The precise mitigation to be implemented will be explored by the contractor based on the detailed design of the Scheme, and will ensure that noise levels are predicted to be below 65 dB LAeq,T at all receptors, with noise levels reduced to not significant levels where practicable to do so. This is secured in the **OCEMP Revision C [EX6/GH7.1_C]**. A bespoke communications strategy will be used in the event that the implementation of practical mitigation measures is not able to reduce the impact of nighttime HDD noise to levels that are not significant. A

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				section 61 consent may also be obtained to confirm that noise impacts are being appropriately managed and are acceptable. Taken together, the additional mitigation secured in the **OCEMP Revision C [EX6/GH7.1_C]** will reduce the effects on receptors to no more than moderate/minor impact which is not significant.
SH-002	Hydrology and Flood Risk	Worst-case scenario	Ms Howell also referred to video evidence that will be submitted to the Inspectorate by Stop Greenhill Solar, showing a completed NSIP at Cleve Hill. She contended that the current assessment does not adequately illustrate a worst-case scenario.	Please refer to the Applicant's response to comment 'SGHS-001' in the **Applicant's Response to Deadline 5 Submissions [EX6/GH8.1.40].**
SH-003			Ms Howell noted that flood water levels at Hardwater Bridge reached 1.48 metres during flooding in September 2024, significantly higher than the 0.44 metres recorded on 26 February, and the 1.01 metres on 8 February, which generated flood alerts and closed bridges. She strongly disputed the assertion that the proposed Battery Energy Storage System Site 2 is environmentally acceptable.	The Applicant notes the recorded flood levels at Hardwater Bridge and the concern raised in relation to Battery Energy Storage System (BESS) Site 2. Flood risk to BESS Site 2 is assessed in **ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [EX6/GH6.2.10_C]**, with supporting detail provided in the Flood Risk Assessment and Drainage Strategy suite. While Environment Agency mapping identifies areas of Flood Zones 2 and 3 within the wider land parcel, the site-specific assessment demonstrates that the BESS

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				platform area lies outside the modelled 1% annual probability event including climate change. The BESS is therefore not expected to be subject to fluvial inundation during the design event. The assessment considers a range of flood mechanisms, including fluvial flooding and the influence of extreme rainfall events, using the Environment Agency's current climate change allowances. The design approach ensures that more vulnerable infrastructure is located outside areas at risk during the design flood event and that the Scheme remains safe and operable for its lifetime. The drainage strategy for the BESS incorporates sealed and isolatable systems to manage runoff and potential contamination, as set out in **ES, Chapter 10 Hydrology and Flood Risk [EX6/GH6.2.10_C]**, and is secured through the **Draft Development Consent Order Revision E [EX6/GH3.1_E]**. On that basis, the hydrology and flood risk assessment does not identify unacceptable flood risk at BESS Site 2.

2.12 Tony Mulvaney

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
TM-001	General	General concerns regarding the scheme	Tony Mulvaney, a Walgrave resident, offered his personal views on the proposed development, expressing concern about the potential loss of access to nature and the impact this would have on local residents. He noted that the region already makes a significant contribution to renewable energy generation, including through existing wind farms, and questioned the necessity of further proliferation of large-scale solar farms, warehouses and associated infrastructure in the area.	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. 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. The Applicant acknowledges existing forms of renewable development in the area. The **Statement of Need [APP-556]** describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				demand and replace output from retiring (fossil fuel) plants, and that "*a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar*". The Scheme is classified as a Critical National Priority (CNP) project as defined in NPS EN-1 and therefore benefits from the strongest policy position in national planning policy. EN-1 sets out a presumption in favour of energy related development. NPS EN-1 explains at paragraph 3.3.63 that: "*The urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible*". The **Statement of Need [APP-556]** provides evidence to support the critical contributions the Scheme will, if consented, make towards achieving the government's energy policy aims of delivering a secure, low carbon and low

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050
TM-002	Consent Order	Decommissioning	Mr Mulvaney also raised concerns about the long-term future of the area, questioning what the condition and character of the landscape would be in 60 years' time as a result of the proposed development.	At decommissioning other than the buried cabling, all infrastructure would be removed with agricultural fields returned back to agricultural use. The reinforced landscape however is likely to be retained as there is an expectation that at Year 60 that there would be an equivalent of current countryside policies in place to ensure the protection of hedgerows, woodland, trees etc. Therefore, 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.

2.13 Keith Burrell

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
KB-001	Design	Glint and glare	Keith Burrell, a resident of the parish of Holcot, stated that the Applicant has failed to respond to his previous representation [REP3-112], which raised concerns relating to glint and glare effects from the proposed solar panels. He expressed the view that the mitigation measures proposed to date are insufficient and requested that the Applicant provide a response supported by modelling to demonstrate the effectiveness of the proposed anti-glare measures. He indicated that the efficacy of anti-reflective coating diminishes when the sun and the viewer are at angles to the panels. He further requested confirmation of the actual brand and technical specification of the solar panels proposed to be installed, together with clarity on where stationary, single-axis	The Applicant refers to the response to comments 'KB-001 to KB-006' in the **Applicant's Response to Deadline 3 Responses [REP4 - 022]**. - The calculations provided by Mr Burrell in his previous representation [REP3-112] do not correspond to how the model calculates predicted glare intensity. Further to this, there is no evidence from several decades of accident and incident data from the UK and the USA that solar PV installations pose a safety hazard to aircraft in the en route phase of flight – see Section 3 of the **Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes [APP-572]**. Neither the CAA nor the MoD, nor the Federal Aviation Administration (FAA) in the USA have issued any rules or guidance that suggest that solar PV installations pose a safety hazard to aircraft in the en route phase of flight. No NOTAM has ever been issued as a result of glint or glare from solar PV installations affecting pilots flying VFR in the UK. There is no evidence from multiple solar PV installations across the UK, Europe and North America that pilots avoid overflight of solar PV installations in order to avoid potential glint and

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			and dual-axis panels would be located across the scheme. Mr Burrell raised particular concern about the potential for glint and glare impacts on low-flying aircraft. In addition, he queried whether mitigation measures relying on tree planting would be effective in screening the panels during winter months, when foliage cover would be reduced.	glare hazards from those installations. There is no evidence that glint and glare from solar PV installations might prevent the Red Arrows performing low level formation aerobatic displays. Within danger area D324A – the designated Red Arrows training airspace around their base at RAF Waddington in Lincolnshire – there are two operational solar farms (Branston and Branston Extension) and one proposed 800MW solar farm (Springwell). In all three cases the planning authority considered potential glare effects on aviation safety and consulted the Ministry of Defence. In all three cases there was no objection on glint and glare grounds from the Ministry of Defence. For the purpose of the glint and glare modelling assessment, 'Smooth glass with Anti Reflective Coating (ARC)' modules have been used to model the surface material of the arrays in order to ensure the worst case scenario is assessed. The technical specification of the panel will be chosen at detailed design stage in line with the parameters assessed and defined in the **Concept Design Parameters and Principles Document Revision C [EX6/GH7.17_C].** The model includes a module reflectance profile. This takes account of the varying reflectance at differing incidence angles (the angle between the sun and the panel surface normal).

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
				The ES adopts a maximum design scenario approach, assessing the Scheme on the basis of the maximum project design parameters relevant to the technical discipline i.e. the reasonable worst-case scenario for impacts (known as the "Rochdale Envelope"). The Application has incorporated flexibility into the design of the Scheme to allow the latest technology to be installed at the time of construction as set out in **ES Chapter 4 Scheme Description [EX6/GH6.2.4_B].** Details of the panels are outlined and secured in **Concept Design Parameters and Principles [EX6/GH7.17_C]** under Work No. 1. The **draft DCO Revision E [EX6/GH3.1_E]** seeks consent for both tracker panels and fixed panel options within the array Sites. The use and distribution of these across the Sites will be subject to further consideration as part of the detailed design of the Scheme. Dual axis panels are not proposed for the Scheme. The glare modelling assessment provided results for a complete year. Where modelled glare was predicted in winter months toward receptors, vegetation was not considered as the mitigating factor on which basis to determine significant effects.

2.14 Steve Townsend

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
ST-001	Consent Order	Decommissioning and scheme funding	Steve Townsend highlighted what he described as the industrial scale of the proposed development and echoed concerns raised by others regarding the adequacy and certainty of decommissioning arrangements. He expressed concern that, once the development becomes operational, Macquarie may withdraw its financial investment, leaving the solar farm burdened with debt and without sufficient financial responsibility to ensure that the site is properly cleared and restored at the end of the project's lifecycle.	Please refer to the following responses 'SA-006' and 'TG-001' above in regard to the decommissioning requirement and details of decommissioning.
ST-002	General	General concerns regarding the scheme	Mr Townsend also questioned whether the output of the development would be sufficient to justify its scale, raising concerns about there being sufficient daylight to provide enough power output, the impacts of panel installation and the anticipated deterioration in performance over time. In addition, he echoed concerns relating to the risks associated with	While the output is higher in direct sunlight, photovoltaic technology can generate electricity even under diffuse light. Bifacial panel designs can further increase efficacy by generating from diffuse or reflected light from the ground or surroundings. The use of bifacial panels is confirmed in the **Concept Design Parameters and Principles Document [EX6/GH7.17_C]**. With regard to panel performance over time, it is acknowledged that solar

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
			lithium battery storage, including the potential for fire.	photovoltaic panels may experience a gradual reduction in efficiency. Regular maintenance will be carried out to assist with any ad-hoc replacement. The Applicant has considered that alongside the regular maintenance of equipment infrastructure such as panels and batteries could require replacement. As Scheme components approach the end of their design life, an evaluation will be conducted to determine if they require maintenance or replacement across the Scheme. Solar PV Panels typically have a lifespan of up to 40 years or more, as such the Environmental Assessment has assessed full scale replacement of Solar PV Panels taking place once during the lifetime of the Scheme. Please refer to the responses to 'SB-005 and BL-001' above regarding BESS fire risk and the implementation of mitigation measures.

2.15 Philip Anthony

Reference	Theme	Issue	Comments/Issue Raised	Applicants Response
PA-001	Environment	Cabling	Mr Anthony stated that, due to the configuration of the proposed solar farm, the development would involve approximately 30 kilometres of cabling. He noted his understanding that the Applicant proposes that, following decommissioning, the cabling would be left in situ underground. He referred to the position of Bedford Borough Council, which has expressed opposition to this approach, highlighting concerns that the decay or deterioration of cabling over long periods could cause significant damage to the soil and subsoil. Anthony concluded by stating that he wished to seek further information and clarification from the Applicant in relation to these potential long-term impacts.	As outlined in **Chapter 4: Scheme Description [EX6/GH6.2.4_C]** The underground cable, cable ducts and joint bays will be decommissioned in accordance with the applicable guidance and regulations at the time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular interval and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. The decommissioning of the Scheme will be addressed within the **Outline Decommissioning Statement [EX6/GH7.4_E]**. A requirement to decommission the Scheme is secured via Requirement 21 in the **draft DCO Revision E [EX6/GH3.1_E]**.