

FINAL STATEMENT

The following statement is a summary of the reasons presented by Stop Greenhill Solar during the course of the Greenhill solar project examination. It identifies the key grounds on which we believe that the application should be refused. We wish to point out that we are not opposed to the use of solar power but emphatically oppose its deployment in the way proposed by the Greenhill Solar Farm application.

1. The design of the project is fundamentally flawed and does not meet the planning criteria set out in the national policy documents. In particular,
2. The applicant has never conducted, or even attempted to conduct, a thorough search for land that is either brownfield or lower grade BMV grade. The applicant has acknowledged that this is the case in (GH8.1.29 (January 2026) where they state that because a high proportion of the land across the area is of high quality it was therefore “not proportionate” to conduct a detailed search for land of a lower grade. In fact, there is ample lower quality farm and other land which could, and should, be used. The applicants’ justification for their land selection has been constructed retrospectively; at the least a new and comprehensive search should be required.
3. The failure to search for appropriate land has resulted in the proposed use of sites that, due to dispersal over a wide area of 30 kilometres, means that gross inefficiencies and other problems are built into the design. Two sites were added opportunistically to the project at a late stage rather than by careful design – Site A2 and G (at Lavendon). The applicant stated then that these additions would give them greater flexibility in design, potentially freeing up some other fields. However, the final proposals mean that there is likely to be increased carbon consumption, negating any claimed contribution to climate related issues. There will also be a range of other “unintended” consequences such as the impact on footpaths, traffic movements, wildlife, noise and other disruptions.
4. The application has proposed the siting of BESS infrastructure in areas that are not appropriate. In particular:
5. BESS and Inverter sites proposed for Grendon are unreasonably close to human habitation. This includes the Gatehouse at Station Road and Grendon village (110 metres and less than 600 metres respectively). The impact of any major accident on local residents is incalculable. Information about the possible impacts of BESS fires has been provided, in particular by Professor Dobson, a leading expert. The possible escapes of nano-particulates from BESS infrastructures has not been researched and

accounted for in battery design in such a way as to ensure safe deployment of the technology near to dwellings.

6. The possible location of alternative BESS infrastructure close to irreplaceable Ancient Woodlands and/or close to Special Protected Areas has the potential to bring incalculable damage to the environment. These issues have not been seriously considered by the applicant. Furthermore, the possibility of flooding or for a BESS fire at site C would have the potential to bring serious damage to Sywell water.
7. In addition, noise from BESS and inverters will cause ongoing disturbance to local residents. Applicant responses to concerns about noise included an acknowledgement that there will be some noise emanating from BESS and inverter but that “it will be quieter than it is now”. This statement has not been explained and is not comprehensible. In reality, inverter and transformer noise are either close to - or at times, likely to exceed harmful levels.
8. The risks of flooding on the proposed Grendon BESS and inverter sites, based on desk-top surveys, has been seriously underestimated. This assertion is based on local, first-hand experience.
9. The impact on the character of the landscape will be permanent. This has been acknowledged by the applicant. Proposed fencing and hedgerow planting will, in fact, never serve to obscure the solar-planted fields. The new hedgerows will, however, succeed in ruining the landscape and church spire views across much of affected countryside.
10. The connection status for the two key elements of the project are not clear or confirmed. The NESO TEC Register currently lists Greenhill Solar and BESS as scoping and without a gate listing at present. At the open hearing (No. 3) the applicant stated that they received an 'Agreement to vary' from NESO for the solar component of the proposal, which moved their connection offer back to Gate 2 phase 1, which NESO currently indicates is a connection date of 2030 or possibly earlier for the solar component only, the firm connection date to be confirmed by NESO by end Sept 2026.
11. The BESS component of the proposed development also received an 'agreement to vary' from NESO, however this was moved later to a Gate 1 offer! The actual date of the offer will not be confirmed until after all the Gate 2 connections have been announced, possibly in 2027. Significantly, Gate 1 offers will be post 2030!

12. In light of the above, therefore, the applicants proposal in the draft DCO is for solar **plus** BESS, and all the viability and investment calculations are based on the hybrid model, However, it could very well be the case that the solar part only is able to proceed. This will not be known for some time. We therefore question whether it is appropriate that some 4/5 years in advance the applicant is applying for a DCO which is fundamentally flawed? Given that in addition, as the applicant has stated, technology moves rapidly in this area, electricity storage may well have moved on from Lithium batteries by then, requiring different specifications and structures. The DCO would then be completely out of date. We contend that the battery storage element of the proposal is, for all the reason just cited, not appropriate for the DCO at this stage. It should be focussed on the solar panel generating element of the application.
13. The surrounding of two ancient villages with solar panels is, we believe, without precedent and contrary to overall planning frameworks. The impact on local residents of replacing open countryside with industrialised solar fields will be damaging to the economy, health and wellbeing of the local population.
14. The replacement of high-quality agricultural land, the majority of which provides essential arable crops in the food chain, with - perhaps - a small number of grazing sheep around the solar panels, will impact national food security into the future.
15. Initial consultations arranged by Greenhill Solar for their proposals were not conducted in a way that was inclusive of all the affected populations: No consultation was held in Mears Ashby, in spite of requests, on the grounds that there are no available facilities. This is not correct. In fact, Stop Greenhill Solar group held and publicised far more events across the area than did Greenhill Solar. Many of the Greenhill meeting notifications, attached to roadside traffic signs, were well away from areas of habitation and noticed more by chance than design. We see this as a reflection of the desire by Greenhill solar to avoid serious and open consultation, contrary to the spirit of national planning policy.
16. Statements made during consultation were inaccurate – such as a denial that heavy goods vehicles would require thoroughfare through Olney. Further, a second, “targeted” consultation provided maps that were extremely difficult to comprehend and hence did not allow representations to be made effectively. This means that any suggestion by the applicant that local views have been fully accounted is not correct.

17. During the processes of consultation and examination many responses provided by the applicant to specific questions and comments were inadequate and non-specific: Concerns regarding the landscape and visualisations across the area were not properly responded to until very late in the process and gave an appearance of being “manufactured”; traffic and transport estimates do not give the impression of being based in reality but rather have been deliberately structured to minimise the real traffic flows; impacts on health and well-being have been based on no real evidence whatsoever; responses to mental health concerns (such as “go to see your doctor”) have been insulting; permissive paths have been designed without any true acknowledgement of the use of those paths or any sense that the new “permissive” paths are in any way a reasonable substitute.

18. All affected local Parish Councils, local council representatives and the Parliamentary representatives for the area, all representing a large proportion of the population, have expressed clear opposition to the project and concerns about its potentially damaging impact.

Without prejudice to the above statement of opposition to the development, we request that, in the event that the application is approved, the following **conditions** are required.

1. That the period permitted for the project should be limited to 40 years.
2. That alterations be made to aspects of the design of the scheme. The applicant was ultimately offered an area of land which is 20% above that required for the proposed amount of power that would be generated. In view of this excessive land allocation, we request that the examiners require that the following fields be reviewed in order to bring about improvements for the local community and landscape:

Field **AF9** to be removed, with construction access to fields **AF2,3** and **4** routed through Access A-2, thus protecting the designated Quiet Lane, Newland Road.

D1, D2 and **D3** to have panels moved at least 10 metres further back to provide a larger buffer

EF4, EF5, EF10, EF11, EF12, to have a larger buffer away from the road and pushing panels back northwards by at least 30 metres, so that traffic is less affected by glint or glare.

We request the same with fields **EF13, EF14, EF15, EF16**, and **EF17** to push the panels southwards to create a larger buffer than is currently on plan.

We request the same consideration along the public footpath to Field Barn to make the PRoW a much better experience. **EF13** and **EF14** to increase buffer adjacent to the path by moving panels northwards. On the other side **EF21** and **EF22** to move panels southwards creating a much better buffer against the path.

In addition, in **EF22** we request you square off the top NE part of the field so it is not as close to existing houses at the SE east side of Mears Ashby, which includes the Jacobean Grade 2 Mears Ashby Hall. Many of these fields are within 1 km of Mears Ashby.

At Easton Maudit we request that consideration is given to the following field reductions:

FF29, lying between Horn Wood and Easton Maudit, containing an old pond. Removal of panels would, to a significant degree, prevent the destruction of excellent open views from PRoWs TD5 and TD7, in a 180-degree northerly arc.

FF32, immediately west of Horn Wood. This would preserve related views looking west from PRoW TD5 as it follows the western margin of Horn Wood.

FF30, lying on the north side of PRoW TD7, immediately west of FF29. This would further protect views on the north side of PRoW TD7.

We note that the 3 fields listed above lie adjacent to a couple of beautiful and greatly valued circular walks, one linking Easton Maudit with Yardley Hastings and Castle Ashby, returning to Easton Maudit via bridleway TD9; the other from EM, southwards along TD5 then returning via the centre of Horn Wood and bridleway TD8.

Illustrative photographs from relevant viewpoints can be seen in the earlier submission **Rep1-204**, in particular, images 1(i-ii), 2(i-ii), 3(i-ii), 4, 5, 6, 7(i-ii), 8(iii-vi), 11, 12, 13 and 14 in that document.

At **Site G** in Lavendon, we support the suggestion put forward by the examiners, to remove field(s) adjacent to the woodland in order to help protect the views as far as is possible.

Given that on its initial outlines the scheme was considered “viable” without the later landholdings (the additional 20%) being included, we believe that generation of electricity from the development would not be impaired by the requirement of these adjustments.

3. We also request that the proposed construction compound (No 4) on Yardley Road is not permitted. The applicant has introduced plans to place a compound adjacent to the A509 and therefore the need for the Yardley Road compound is removed. This would immediately reduce traffic issues around Grendon and avoid the need for haulage vehicles to use the trackway between Station Road and Yardley Road. The footpath between Grendon and Castle Ashby would also thus be left intact.
4. That permissive path access should be further reviewed to ensure that a more reasonable access be available. This should include the path from Grendon – Castle Ashby which was admitted at the last hearing, by the applicant, to be an imposition and reconsidered. This has subsequently been ignored by the applicant with reference only to the annual Waendel Walks. Concerns about Public Rights of Way

also focus on the Three Shires Way, valued for its rural setting. Construction would make parts of the route unusable and unsafe, especially for horse riders, while the permanent change to the landscape would diminish the experience even where paths remain. Multiple routes in and around Lavendon, including within G13, would be disrupted, reducing the quality and usability of the network overall.

5. That any access routes near to Ancient Woodlands be located at least 50 metres from the edge of the wood.
6. That any trenched cabling be completely removed at the end of the project to ensure that no longer term damage to soil is possible. Without full removal landowners will not be eligible to apply for any agricultural subsidies that may be available at the time.
7. There are also objections to the site in Lavendon which highlight that localised flooding has been ignored, with past incidents overlooked and risk assessments based largely on models rather than actual conditions. The assessment fails to account for how extreme rainfall and climate change could worsen flooding, meaning the true risk has been minimised rather than properly acknowledged. Objectors also note that the development has not followed the sequential approach, suggesting G13 is not necessarily the area of lowest flood risk available. We request further review of the proposals affecting that area.
8. Island Green Power is proposing 12 Management Plans to be implemented over 9 separate locations covering 3000 acres and connecting cables. If there is one project manager for each site and each Management Plan that would be over 100, probably more, qualified experts for construction, operation, and decommissioning, We question how 3 Local Authorities and Relevant Regulators will be able to reasonably approve the 12 outline management plans within the timescales proposed in the draft DCO. Some of the promises made by the applicant may therefore be overlooked because of the scale of the task. SGHS believes that when weighing up the benefit and damage resulting from this NSIP application the projects is too large to enable proper regulation during construction, operation for 60 years and decommissioning which will leave most residents in the area in a much worse position than at present. We therefore request a review and reduction in scale of the proposals that have been presented.

We believe that the proposed project is too large, in the wrong location and that there will no positive consequences to the existing ecosystem or human residents over a vast rural area.

Prepared and submitted by **Stop Greenhill Solar Cross County Steering Group.**