

Green Hill Solar Farm

EN010170

The Applicant's Closing Statement

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 7

The Applicant's Closing Statement

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1 Introduction

1.1 Purpose of this document

- 1.1.1 These Closing Statements have been prepared on behalf of Green Hill Solar Farm Limited (the Applicant) to summarise the Applicant's position on matters that remain outstanding at the conclusion of the Examination of the application for a Development Consent Order (DCO) to construct, operate, maintain and decommission the Green Hill Solar Farm (the Scheme).
- 1.1.2 The matters included under Section 3 have been identified as key matters of disagreement between the Applicant and the local authorities and/or statutory bodies or matters which have drawn attention from the Examining Authority and/or Interested Parties during the Examination.
- 1.1.3 These Closing Statements are not intended to set out in full the Applicant's final position; instead, they provide signposting to the Applicant's submissions which have been made over the course of the Examination to assist the Examining Authority and Interested Parties in accessing submissions the Applicant considers relevant to the matters being discussed.
- 1.1.4 These Closing Statements do not introduce new material drawing on, and refer to, submissions made by the Applicant in its application for the DCO for the Scheme (the Application) and throughout the course of the Examination. The signposting is not intended to be exhaustive but highlights those submissions the Applicant considers most directly relevant.

1.2 The Scheme and the Application

- 1.2.1 The Scheme consists of an electricity generating station with a capacity of approximately 500 megawatts (MW) comprising of ground mounted Solar Arrays and associated development, the latter encompassing: energy storage, grid connection infrastructure and any other infrastructure as well as works integral to the construction, operation, maintenance and decommissioning of the Scheme.
- 1.2.2 The national grid connection Point of Connection (PoC) will be at the Grendon 400kV National Grid Substation (Grendon Substation).
- 1.2.3 The Scheme comprises two main parts: (i) nine land parcels (the 'Site' or 'Sites') referred to individually as Green Hill A, Green Hill A.2, Green Hill B, Green Hill C, Green Hill D, Green Hill E, Green Hill F, Green Hill G and Green Hill BESS for the solar arrays, grid connection infrastructure and Energy Storage; and (ii) the Cable Route Corridor.
- 1.2.4 The Scheme Order Limits comprise in total 1,441.4 hectares (ha) of land located within the administrative areas of North Northamptonshire Council (NNC), West Northamptonshire Council (WNC) and Milton Keynes City Council (MKCC).
- 1.2.5 The Sites are located north, east and southeast of Northampton; west and south of Wellingborough; and near to the villages of Walgrave, Mears Ashby, Earls Barton, Bozeat, Grendon and Lavendon. All of the Sites lie within a 15km radius of the PoC to the National Grid at the Grendon Substation. See the Location Plan [REP3-004] for the site locations.



- 1.2.6 The Scheme constitutes a Nationally Significant Infrastructure Project (NSIP). An Application for a DCO for the Scheme was submitted by the Applicant on 23 May 2025. The Application was accepted for examination on 19 June 2025.
- 1.2.7 The Applicant submitted Change Application 1 to modify the Order Limits on 10 November 2025, the Applicant's Change Application and Consultation Report **[CR1-039]** and Supporting Environmental Information Report **[CR1-040]** explain the rationale and need for these changes. The Examining Authority (ExA) accepted the Change Application on 21 November 2025.
- 1.2.8 Change Application 2 was submitted by the Applicant on 10 February 2026 and accepted by the ExA on the 13 February 2026. Further details of these changes are detailed in the Applicant's Change Application and Supporting Environmental Information Report **[CR2-024]**. Change Application 2 did not modify the Order Limits and therefore did not engage the provisions in The Infrastructure Planning (Compulsory Acquisition) Regulations 2010.
- 1.2.9 The likely environmental effects of the Scheme are assessed in the Environmental Statement **[APP-038, APP-039, REP1-029, REP6-011, APP-042 to APP-045, REP6-013, REP6-007, APP-048, APP-049, REP2-003, APP-051 to APP-058, REP1-025, APP-060, REP1-027, APP-062, APP-063, REP6-009]** that accompanies the Application.

1.3 The Examination

- 1.3.1 The Examination of the Scheme opened on 21 October 2025 and is scheduled to close on 10 April 2026. Prior to and during the Examination, the Applicant has worked positively to address and resolve issues that have been raised by statutory consultees, interested parties and members of the public. The Applicant has agreed Statements of Common Ground with the key stakeholders, with positions summarised in the Statement of Commonality **[EX7/GH8.1.16_E]**. At Deadline 7 the Applicant is submitting the following final and signed versions Statements of Common Ground:
- North Northamptonshire Council Statement of Common Ground Revision C **[EX7/GH8.3.1_C]**.
 - West Northamptonshire Council Statement of Common Ground Revision C **[EX7/GH8.3.2_C]**.
 - Milton Keynes City Council Statement of Common Ground Revision C **[EX7/GH8.3.3_C]**.
 - Environment Agency Statement of Common Ground Revision D **[EX7/GH8.3.5_D]**.
 - Natural England Statement of Common Ground Revision C **[EX7/GH8.3.6_C]**.
 - National Highways Statement of Common Ground Revision B **[EX7/GH8.3.7_B]**.
 - National Grid Electricity Transmission Statement of Common Ground (DRAFT) Revision A **[EX7/GH8.3.10_A]**.



- 1.3.2 At each Examination Deadline, the Applicant has provided comprehensive commentary on the progress on the above Statements of Common Ground.
- 1.3.3 There remain a number of points of disagreement that it has not been possible to resolve during the Examination. In the following sections, the Applicant sets out its position on these matters, summarising and cross-referring to previous submissions made during the course of the Examination where appropriate.



2 Policy Context, Need and Benefits

- 2.1.1 On 17 January 2024, the Secretary of State formally designated the suite of Energy National Policy Statements which were published in November 2023 (EN-1 to EN-5). The NPSs were further updated in December 2025 and designated in January 2026 to align with the latest government policy and objectives on the need to decarbonise through the use of renewable energy which needs to be significantly increased in all sectors such as wind and solar. In accordance with section 1.6 of NPS EN-1 (December 2025), the November 2023 suite of NPSs will continue to apply to projects accepted for examination before January 2026.
- 2.1.2 Paragraph 1.6.3 of NPS EN-1 (December 2025) states that (underlined for emphasis):
- “However, any emerging draft NPSs (or those designated but not yet having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each Development Consent Order application.”*
- 2.1.3 The November 2023 NPSs set out the Government’s energy-related policy, and reflect the urgent need, and unambiguous policy support, for low carbon infrastructure. NPS EN-3 also includes technology specific policies relevant to solar PV and the role of energy storage as associated development.
- 2.1.4 In paragraphs 2.1.5 to 2.1.9 below, the Applicant highlights key sections of the November 2023 NPSs, which demonstrate the critical role of ground mounted solar PV and BESS in supporting the delivery of the UK’s international climate change commitments, helping the UK transition to an affordable and secure carbon-free electricity system by 2035, and supporting achieving net zero in the UK by 2050. Please refer to section 4 of the Statement of Need [APP-556] for further information on how the Scheme will assist in the UK government in achieving its legal commitment to decarbonise.
- 2.1.5 Paragraph 3.1.1 of NPS EN-1 (November 2023) states that: *“Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and ... considers that the need for such infrastructure is urgent.”*
- 2.1.6 Paragraph 3.3.20 of NPS EN-1 (November 2023) reiterates the Government’s view that *“a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.”* Paragraph 3.3.60 confirms that solar schemes are *“included within the scope of this NPS”* and would be classed as NSIPs if, like the Scheme, they are above the applicable capacity threshold of 100MW.
- 2.1.7 Paragraphs 3.3.57 to 3.3.64 of NPS EN-1 (November 2023) establish the urgent need for electricity generating capacity. Paragraph 3.3.61 states that *“The need for all these types of infrastructure is established by this NPS and a combination of many or all of them is urgently required for both energy security and Net Zero”* and paragraph 3.3.62 states the Government’s conclusion that *“there is a critical national priority (CNP) for the provision of nationally significant low carbon*



infrastructure" including all onshore and offshore renewable generation (paragraph 4.2.5). Therefore, all large-scale, ground-mount solar projects, including the Scheme, constitute CNP infrastructure.

- 2.1.8 Paragraph 3.3.63 of NPS-EN-1 (November 2023) states 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"*. This section of NPS EN-1 concludes that *"Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible"* (see paragraph 3.3.64).
- 2.1.9 Paragraph 4.1.7 of NPS EN-1 (November 2023) states that, for projects which qualify as CNP infrastructure, *"it is likely that the need case will outweigh the residual effects in all but the most exceptional cases"*.
- 2.1.10 It is the Applicant's position that, having applied the mitigation hierarchy, none of the residual adverse effects of the Scheme set out in Chapter 26: Summary of Significant Effects of the Environmental Statement **[APP-063]** can reasonably be considered to be *"exceptional"*. Therefore, the need case for the Scheme outweighs the residual effects that have been identified.
- 2.1.11 NPS EN-1 (November 2023) also establishes the urgent need for "new electricity network infrastructure to be brought forward at pace to meet our energy objectives" (paragraph 3.3.65), recognising that the current network and available connection points are not of sufficient scale to connect the capacity required. New electricity networks and connections to them also constitute CNP infrastructure (paragraph 4.2.5).
- 2.1.12 In November 2023, the Department of Energy Security and Net Zero and Ofgem (the independent energy regulator) published the Connections Action Plan. This Plan sets out six key areas of action to speed up connections to the electricity network across Great Britain, in recognition of how critical this progress is to the decarbonisation of the national grid. Action Area three is to "Better utilise existing network capacity" to reduce connection timelines. Action Area four is to "Better allocate available network capacity" to connect projects that are readier to progress and are able to quickly make use of that capacity.
- 2.1.13 The Scheme proposes to connect to an existing and available connection point on the National Electricity Transmission System (NETS) at Grendon Substation, the benefits of which are described in Section 9 of the Statement of Need **[APP-556]**. The Scheme therefore presents an opportunity to reduce the need for new infrastructure, by utilising existing infrastructure. It is the Applicant's position that consenting the Scheme would deliver significant energy security, decarbonisation and affordability benefits to UK consumers as the Scheme can be delivered quickly and make use of an existing connection to the NETS. The Scheme is therefore in compliance with Action Areas three and four in the Connections Action Plan.
- 2.1.14 Section 11 of the Statement of Need **[APP-556]** summarises the Applicant's case on the urgent need for the Scheme. In oral and written submissions throughout the Examination of this application, the Applicant has reiterated this case, which



it considers has been strengthened by the designation of the December 2025 Energy NPSs which clearly demonstrate the government's commitment to the delivery of ground mounted solar PV and the role of energy storage. In summary, the Statement of Need **[APP-556]** confirms that:

"11.1.27 ...the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero beyond delivery of the Government's 'Clean Power by 2030' mission.

11.1.29 The Scheme is a leading GB large-scale solar plus storage scheme. If consented, it would be an essential component of the UK's plan to deliver a future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low carbon generation schemes and would also deliver flexibility to the UK electricity market."

- 2.1.15 Taking into account the context of the definition of CNP infrastructure in NPS EN-1, and the test that *subject to any legal requirements, 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 the application of the mitigation hierarchy*" (paragraph 3.3.63), the Planning Statement **[REP6-037]** concludes that the residual adverse effects are outweighed by the Scheme's benefits. Section 4.1.2 of the Planning Statement **[REP6-037]** sets out that the principal need for the Scheme is centred on the significant contribution it will make to the three important national energy policy aims of:

"Decarbonisation – achieving Net Zero carbon emissions by 2050, requiring deployment of zero-carbon electricity generation at scale. The Scheme will generate large-scale low carbon electricity which could be operational by 2029.

Security of supply – geographically and technologically diverse supplies. The Scheme will contribute to security of supply due to its large scale; predictable output; ability to complement other renewables; and the efficient opportunity to integrate Energy Storage.

Affordability - The Scheme will provide large-scale generation at low cost which will provide value for money for end-use consumers."

- 2.1.16 In addition to the national policy statements there are a number of policy and legislative documents which the Applicant consider to be important relevant which are set out in section 5.6 of the Planning Statement **[REP6-037]**.

- 2.1.17 One of the most recent documents considered is The Land Use Framework for England was presented to Parliament in March 2026. The purpose of the framework is to set out the effective use of land. It includes a vision for England's future landscape, sets out a new set of principles to inform how decisions are made about land and includes actions that the Government will take to support land change use, in combination with other stakeholders. It also recognises that, while national policy steers land-use change away from the most productive agricultural land, decisions about how land is used ultimately rest with farmers and landowners. Where proposals do come forward on BMV land, this framework highlights opportunities for multifunctional approaches that retain agricultural



value while delivering broader environmental benefits. This is applicable to the Scheme as sheep grazing is anticipated across most of the Sites, thereby enabling continued agricultural activity.

- 2.1.18 The broader environmental and other benefits of the Scheme are described in detail at section 4.6 of the Planning Statement **[REP6-037]** and include:
- 2.1.19 A significant net gain for biodiversity (BNG), with a minimum of 47% gains provided in habitat units, a minimum of 10% gains in hedgerow units and a minimum of 10% gains river units, in line with local and national planning policies. Provision of a minimum amount of BNG is secured through requirement 9 of Schedule 2 to the draft DCO (Revision F) **[EX7/GH3.1_F]** and the approval and implementation of the measures in a Landscape and Ecological Management Plan, provision of which is secured through requirement 7 of Schedule 2 to the draft DCO (Revision F) **[EX7/GH3.1_F]** This must be substantially in accordance with the Outline Landscape and Ecological Management Plan **[REP6-047]**.
- 2.1.20 The Applicant has explored opportunities to improve connectivity within the area and enhance the visual amenity of the scheme through landscape mitigation. This has included the provision of permissive paths in Green Hill A, A.2, D, E, F and G to benefit residents and enhancement to PRoW's and permissive path user experience through the planting of wide planting buffers and ecological areas, separating users from onsite infrastructure (see the Landscape and Ecological Mitigation Plans **[REP6-021; REP6-023; APP-209; REP3-046; APP-211; REP6-025; REP6-027; APP-214; APP-215; REP3-052; REP1-113; REP3-054; REP6-030]**).
- 2.1.21 The temporary employment generated by the Scheme's construction is assessed to be approximately 464 direct FTE jobs per annum as set out within Section 17.5.2 of ES Chapter 17: Socio Economics, Tourism and Recreation **[APP-054]**. During its operational lifetime, the Scheme is also anticipated to generate a modest quantum of labour, related to ongoing operational management and site management. It is projected that the Scheme will require a gross 15 FTE direct employees per annum as set out within Section 17.5.19 of ES Chapter 17: Socio Economics, Tourism and Recreation **[APP-054]**.
- 2.1.22 A Skills, Supply Chain and Employment Plan will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally. It will be secured through a requirement included in the DCO for the Scheme. The Outline Skills, Supply Chain and Employment Plan **[APP-552]** forms the basis for this.



3 The Applicant's Final Position on Key Examination Matters

3.1 Landscape and Visual Impact

- 3.1.1 There has been continued and positive consultation and engagement undertaken with NNC and WNC and their shared representative throughout the entirety of the DCO application process.
- 3.1.2 The final agreed position with regard to ES Chapter 8 Landscape and Visual **[APP-045]** between the Applicant and NCC and WNC is set out within the respective Statement of Common Grounds (SoCG) **[EX7/GH8.3.1_C]** and **[EX7/GH8.3.2_C]**. This confirms to the Examining Authority (ExA) where agreement has or has not been reached between both parties.
- 3.1.3 The SoCGs set out that both parties are in agreement on the majority of matters with only a small number of matters disagreed. All parties are agreed that the baseline conditions, appendices and figures, study area/scope of assessment, assessment methodology and character assessments are appropriate and sufficient for the purposes of the Examination. Both parties are also agreed that the viewpoints for the Sites and the cable route corridor are appropriate and sufficient for the purposes of the Examination. The landscape value judgements presented in ES Chapter 8 Landscape and Visual **[APP-045]** relating to landscape value are agreed between the two parties and are considered to appropriately reflect the characteristics, condition and local distinctiveness of the receiving landscape.
- 3.1.4 Both parties are in agreement that the embedded mitigation that has been incorporated through the Outline Landscape and Ecological Management Plan **[REP6-047]** and associated mitigation drawings, represent a landscape-led approach and the extent of vegetation removal, is relatively minimal.
- 3.1.5 Both parties agree that prior to the establishment of the mitigation proposals, effects on landscape character associated with Sites A, A.2 and B individually within the Local Study Area during construction and at Year 1 would be Significant. Both parties agree that the landscape assessment for Sites C, D, E and F are acceptable.
- 3.1.6 Both parties are in agreement that the Scheme would deliver landscape and ecological improvements through mitigation areas and through new planting which would add a positive element to this landscape. Both parties also agree that the necessary provisions are in place to secure these mitigation proposals associated with the Scheme as set out by Requirement 7 of Schedule 2 to the Draft Development Consent Order **[EX7/GH3.1_F]** and that no further mitigation is considered necessary from that already identified.
- 3.1.7 The parties are in disagreement on the embedded design mitigation following decommissioning, the proposed planning and habitat measures as set out in the Landscape and Ecology Mitigation and Enhancement Plans (Figures 4.10 to 4.20) **[APP-207 to APP-219, REP1-111]** that would deliver ecological and structural improvements across all the Sites, the cumulative effects of the multiple Sites of the Scheme and the operational life of the Scheme being 60 years rather than 40 years which is considered to be materially preferable. There is disagreement between NNC and the Applicant that the landscape character



assessment for Sites E, F is acceptable. These areas of disagreement come down to professional judgement as set out in the Statements of Common Ground **EX7/GH8.3.1_C** and **EX7/GH8.3.2_C**].

- 3.1.8 The Applicant has sought to undertake a constructive and proactive approach to consultation with MKCC and their landscape officer but there has been limited engagement from the MKCC landscape officer which has resulted in only three items which both parties agree on. These are the baseline condition, the study area/scope of assessment and the viewpoints for the cable route corridor being acceptable to inform the baseline.
- 3.1.9 One of the main areas of disagreement between the parties relates to the status and relevance of the emerging Milton Keynes City Plan 2050 and proposed policies GS7 Wind and solar development spatial strategy and CEA12 Conserving and enhancing landscape character/Special Landscape Areas (SLA). The Applicant considers that Green Hill G should not be included in the proposed extension of the SLA as it does not contribute to the purposes of the SLA. Green Hill G is also proposed to be designated under emerging policy GS7 as a preferred area for both solar and wind development. Whilst the Applicant is mindful that policy designations may overlap, where this occurs the policies will typically be compatible with each other. However, the Council has highlighted that these policies are in conflict during the DCO examination for the Scheme, stating that the proposed solar development at Green Hill G would be detrimental to the character of the Special Landscape Area, while, at the same time, designating that area as a preferred area of search for solar within its emerging Local Plan. In addition, the Applicant contends that at the time ES Chapter 8 Landscape and Visual **[APP-045]** was undertaken the emerging Local Plan and its evidence base was at Regulation 18 stage, with minimal weight being applied to these policies.
- 3.1.10 Across the Scheme, the following approximate areas will be planted for habitat creation, landscaping and visual screening
- Green Corridor and Woodland Planting: 14.4ha.
 - Enhanced Riparian Native Planting: 12.8ha.
 - Hedgerow Reinforcement and Reinforced Roadside Vegetation: 35.2km.
 - Proposed Hedgerows: 15.5km.
 - Groundcover: 1,130.58ha.
- 3.1.11 The Scheme has committed to securing a minimum of 47% gain provided in habitat units, a minimum of 10% gain in hedgerow units and a minimum of 10% gain in river units as secured through Requirement 9 in Schedule 2 to the Draft DCO **[EX7/GH3.1_F]**.
- 3.1.12 This new landscaping has been designed to build upon and positively respond to the aims and management guidelines of the Regional and Local Landscape Character Assessments. Mitigation measures are set out in the Outline Landscape and Ecological Management Plan **[REP6-047]** and will be secured through Requirement 7 in Schedule 2 to the draft Development Consent Order **[EX7/GH3.1_F]**.



3.1.13 Following further development of the design of the Scheme post consent, more detailed planting plans including details of areas of landscape mitigation, location and types of planting (species), as well as number, density and specification would be submitted for approval prior to any works commencing.

3.2 Functionally Linked Land

3.2.1 The Applicant proposes the provision of Functionally Linked Land (FLL) as identified through the Habitats Regulations Assessment **[REP5-079]**. It details the fields identified for mitigation of FLL including their extent, location; current and proposed land use. Details regarding the establishment, management and monitoring of both retained FLL and proposed FLL mitigation land (as well as all other proposed habitats) are provided in the Outline Landscape and Ecological Management Plan **[REP6-047]**. Sections 4.6, 4.7 and 4.9 cover grassland, wetland (wader scrapes) and farmland habitats, which are proposed within the FLL fields.

3.2.2 As per Section 4.10 of the Outline Landscape and Environmental Management Plan **[REP6-047]** and Method Statement 13 in the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]**, all FLL mitigation fields will be secured and maintained as suitable for foraging golden plover and lapwing from the outset of construction to the end of the operational lifetime of the Scheme. FLL mitigation fields may be secured, and any proposed habitat conversion works enacted, ahead of commencement of construction, but this may not be possible in all cases. Where habitat conversion works cannot take place pre-construction, they will either take place in the next available window following commencement of construction, or the next window following harvest of the existing crop. For grassland seeding, these works are seasonally constrained to late summer/autumn (late July-October), or spring (March-May). The maximum window between commencement of construction works and seeding is 12 months (if construction were to commence in November following sowing of a winter-sown crop, and seeding not be completed until the following October, post-harvest). This is a worst-case scenario. Until seeding works take place, the fields will be maintained in their current land management type as suitable for foraging by golden plover and lapwing. As such, there will be no net loss of FLL at any stage.

3.2.3 NNC are in disagreement with the Applicant on the timing of the FLL, with NNC maintaining that the FLL should be brought into long term management prior to commencement of construction. However, the approach summarised above has been agreed with Natural England as set out in the Statement of Common Ground **[EX7/GH8.3.6_C]**. It is therefore the Applicant's position that the concerns of NNC in relation to the timing and establishment of FLL are unsubstantiated, noting that Natural England is content that the Applicant's approach adequately and appropriately secures the provision of FLL.

3.2.4 The Applicant's position is that the principle of the mitigation of losses of FLL is to secure no net loss in the extent (area) of FLL, for the lifetime of the Scheme. As detailed in the Habitats Regulations Assessment **[REP5-079]**, the Scheme secures a surplus of land to the quantum of FLL (and precautionary FLL) which will be lost. Some FLL fields are simply retained and will be suitably managed,



whilst alternative fields are secured to offset losses of other FLL fields. Unlike a Biodiversity Net Gain Assessment, there is no defined metric to assign values to particular habitat types, and therefore the mitigation strategy principally seeks to secure at least no net loss in FLL extent. However, the strategy also proposes the fields to be managed as particular habitat types, adjudged to be appropriate based on ecological expertise. This entails the conversion of the majority of the mitigation fields from their current arable management to conservation grassland. As detailed in Method Statement 13 of the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]**, the FLL mitigation fields will be managed and maintained as suitable for golden plover and lapwing until habitat conversion works (such as grassland seeding) can take place, which may be after construction commences. The fields will be converted to their proposed habitat types for the operational lifetime of the Scheme within 12 months of construction commencement. Given that the fields will be maintained as suitable in the interim period, there will be no net loss in the extent of FLL at any point.

3.3 Ancient Woodland Buffers

3.3.1 During the Examination there has been significant discussion seeking clarity and signposting to the Applicant's position on ancient woodland buffers.

3.3.2 Potential impacts to Ancient Woodland have been considered within the following chapters of the environmental statement:

- ES Chapter 9: Ecology and Biodiversity **[REP6-013]**;
- ES Chapter 19: Arboriculture **[APP-056]**; and
- ES Appendix 19.2: Arboricultural Impact Assessment and Outline Arboricultural Method Statement **[REP6-015]**.

3.3.3 There are five areas of ancient woodland within 50 m of the Order Limits, being:

- Sywell Wood, outlined in Figure 19.2.10 **[APP-510]**;
- Horn Wood outlined in Figure 19.2.26 **[APP-526]**;
- Threshire Wood outlined in Figure 19.2.29 **[APP-529]**;
- Nun Wood outlined in Figure 19.2.29 **[APP-529]**; and
- Barslay Spinney outlined in Figure 19.2.30 **[APP-530]**.

3.3.4 It is confirmed that a minimum 15m protective buffer will be applied and implemented for all ancient woodland parcels within the Cable Route Corridor, as per the Arboricultural Impact Assessment and Outline Arboricultural Method Statement **[REP6-015]**, the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]**, and Outline Construction Environmental Management Plan **[EX7/GH7.1_D]**. The Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]** clarifies where 15m buffers will be applied for the Cable Route Corridor (which includes buffers to all cabling works and construction compounds), and extended 30m buffers for the Green Hill Sites (notwithstanding the specific permitted works within the buffer zones). The 15m buffer for ancient woodland is recommended by Natural England and the Forestry Commission to protect ancient woodland; therefore, the provision of up to 30m within the Sites



demonstrates that where practicable, the Scheme delivers protection beyond established good practice for ancient woodland.

- 3.3.5 Within the Sites no infrastructure works will take place within the 15m buffer (no installation of built infrastructure, including cabling), no site personnel or plant (machinery) shall enter the buffer and no equipment will be stored therein. The only works which may take place within the 15m buffer zone are limited to unavoidable, non-intrusive works, such as upgrades to two existing tracks through the use of a 'no-dig' solution and provision of permissive paths under Work No. 10. Manual works associated with landscaping and biodiversity mitigation and enhancement measures including planting (using hand tools) are also permitted.
- 3.3.6 Within the Cable Route Corridor there will be a minimum of 15m buffers applied to ancient woodland parcels (which includes buffers to all cabling works and construction compounds). These 15m ancient woodland buffers will be demarcated through the installation of Biodiversity Protection (Buffer) Fencing for the full duration of works within the field/fields adjacent to the ancient woodland. No infrastructure works will take place within this 15m buffer (no installation of built infrastructure, including cabling), no site personnel or plant (machinery) shall enter the buffer zones, and no equipment will be stored therein.
- 3.3.7 The works permitted within the 15 to 30m buffer within the Sites are set out in Method Statement 2 (section 3.5) of the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]**. Where this occurs, the least disruptive activities will be prioritised closest to the edge of the 15 m buffer. All works will be carried out in accordance with the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]**, Arboricultural Impact Assessment and Outline Arboricultural Method Statement **[REP6-015]** and Outline Construction Environmental Management Plan **[EX7/GH7.1_D]** agreed in advance with, and undertaken under the supervision of, the Ecological Clerk of Works (EcoCoW) and/or the Arboricultural Clerk of Works (ACoW) as appropriate. No significant effects have been identified on Ancient Woodlands within the Environmental Statement **[APP-038, APP-039, REP1-029, REP6-011, APP-042 to APP-045, REP6-013, REP6-007, APP-048, APP-049, REP2-003, APP-051 to APP-058, REP1-025, APP-060, REP1-027, APP-062, APP-063, REP6-009]**.

3.4 Project Lifespan up to 60 Years

- 3.4.1 During the Examination, NNC and WNC have maintained an objection to the proposed operational life of the Scheme being 60 years, stating a 40 year period would materially preferable.
- 3.4.2 The Applicant has proposed a 60 year operational life since the inception of the Scheme, prior to submission. The operational life of the Scheme is for no more than 60 years and decommissioning is therefore estimated to be in 2089.
- 3.4.3 Requirement 21 of Schedule 2 to the draft DCO (Revision F) **[EX7/GH3.1_F]** requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities.
- 3.4.4 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. The Environmental Statement has not identified any environmental impacts that would warrant a shorter operational period for this Scheme. There have been no objections raised by any other statutory consultees including Natural England, Environment Agency or Historic England on the proposed operational life time of the Scheme.

- 3.4.5 The Applicant notes that whilst an upper limit of 40 years is typical, paragraph 2.10.141 of NPS EN-3 (November 2023) recognises that applicants may seek consent without a time period or for differing time-periods for operation. A 60-year period has been chosen in recognition of the urgent need for renewable energy generation, with provision made for replacement of solar PV panels to maximise generation throughout the lifetime of the Scheme.
- 3.4.6 The Applicant considers that the environmental impacts of an operational period of up to 60 years for the Scheme, including the replacement of solar PV panels, has been adequately assessed and that appropriate mitigation is secured through the draft DCO (Revision F) **[EX7/GH3.1_F]**.
- 3.4.7 The Applicant confirms that the assessment methodology underpinning this review is as set out in ES Chapter 2: EIA Process and Methodology **[APP-039]** and, where applicable, the relevant chapter of the Environmental Statement.

3.5 Agricultural Land

- 3.5.1 Both WNC and NNC have disagreed with matter ALC-03 of both Statements of Common Grounds **[EX7/GH8.3.1_C** and **EX7/GH8.3.2_C]** in relation to impacts on ALC graded land and soil quality. In particular, the Councils suggest that the proposed 60-year period should be regarded as more permanent than temporary, and that the extent of BMV land loss is therefore understated.
- 3.5.2 The land use change involves, in part, the conversion of arable land to grassland. The land would not be entirely removed from agricultural use, as sheep grazing is anticipated across most of the Sites, thereby enabling continued agricultural activity. This is consistent with the Government's recent Land Use Framework which recognises at a policy level the potential for solar projects to continue to host agricultural activity, known as agrivoltaics.
- 3.5.3 The land required for the proposed Scheme represents only 0.01% of the 16.8 million hectares of utilised agricultural area and 0.027% of the 4.4 million hectares of arable land in the UK; therefore, it is not considered to have a significant impact on national food production or food security.
- 3.5.4 Furthermore, the conversion of arable land to grassland is expected to have beneficial effects on soil function and agricultural land quality. The removal of intensive arable practices (such as regular tillage) is a well-established means of improving soil structure. The land can therefore reasonably be regarded as being in long-term fallow, contributing to a form of strategic land reserve.
- 3.5.5 The soil mitigation approach and management measures during decommissioning stage are included in the Outline Soil Management Plan **[REP6-053]**. Soil profiles will be reinstated in accordance with a detailed Soil Management Plan, which will be developed pre-decommissioning to ensure that



soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil condition and undertake any further remediation that may be required.

- 3.5.6 The use of BMV land is a common area of focus for large-scale solar projects and has been a key concern raised by the public, reflecting the position set out in National Policy Statement EN-3. Paragraph 2.10.29 states that *“poorer quality land should be preferred to higher quality land, avoiding the use of Best and Most Versatile agricultural land where possible”*.
- 3.5.7 Environmental Statement Chapter 5: Alternatives and Design Evolution [**APP-042**] and ES Appendix 5.1: Site Selection Assessment (Revision A) [**REP1-037**] set out the Applicant's approach to site selection. The selection of the Scheme's proposed location has followed a five-stage site selection process, which has sought to identify sites that meet the legislative and policy requirements, whilst recognising the need for the Scheme to be commercially viable. Throughout the site-selection process, several factors including environmental and planning considerations were assessed at each stage, to minimise potential harm.
- 3.5.8 The Applicant acknowledges that the Scheme involves the use of BMV land. However, the Farming Report [**APP-571**] demonstrates that, within the wider area, land is predominantly within the 20–60% BMV or >60% BMV categories. Much of Northamptonshire, particularly to the north and southwest of Grendon, comprises higher-grade land, typically a mix of Grade 2 and Grade 3, often within the same fields. This significantly constrains the ability to deliver a scheme of this scale without including higher-grade land. Comparable sites of a similar size within the county would be expected to contain similar proportions of BMV land. Given the high prevalence of BMV land within the 20 km search area of Grendon Substation, it was not feasible to avoid BMV land while meeting the Scheme's scale and operational requirements.
- 3.5.9 National Policy Statement 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.

3.6 Hydrology and Flood Risk

- 3.6.1 Flood risk and hydrology has been a key focus of the Examination. In response to comments received, the Applicant has undertaken substantial further work to refine its position, engaging proactively with the Environment Agency (EA) to reach agreement, and to provide additional assurance to the Examining Authority and Interested Parties that potential effects are appropriately managed.
- 3.6.2 All concerns raised by the EA in respect of hydrology, flood risk and drainage have been addressed through proactive consultation between the Applicant and the EA during the Examination period.
- 3.6.3 The EA raised concerns regarding pollution prevention measures in relation to BESS containment. The Applicant consulted with the EA on this matter and has



committed to drainage and pollution prevention principles, rather than a fixed construction specification. The detailed surface water drainage scheme will be developed at the detailed design stage and is secured through Requirement 11 of the DCO. The updated Flood Risk Assessment and Drainage Strategy **[REP5-021]**, and the Outline Battery Storage Safety Management Plan **[REP5-075]** were updated for submission at Deadline 5. The WFD was also updated to consider firewater risk. Following this, the matter has been agreed with the EA under matter HYD-09 of the Statement of Common Ground **[EX7/GH8.3.5_D]**.

3.6.4 Concerns were also raised in relation to flood modelling, specifically in respect of Grendon Brook and the River Nene. The Applicant has engaged with the EA on these matters and submitted a Hydraulic Modelling Technical Note (BESS) in response. Following this, the EA has confirmed that outstanding matters are resolved under matter HYD-06 of the Statement of Common Ground **[EX7/GH8.3.5_D]**.

3.6.5 The draft DCO (Revision F) **[EX7/GH3.1_F]** disapplies the requirements to obtain separate flood risk activity permits and ordinary watercourse consent. The protective provisions for the Environment Agency in Part 7 of Schedule 15 are agreed, as set out in the SoCG with the EA **[EX7/GH8.3.5_D]**, and ensure equivalent and appropriate oversight from the EA for works that would otherwise have required a permit. The protective provisions for Lead Local Flood Authority provided in Part 9 of Schedule 15 are agreed with each of the three local authorities, and ensure approval and oversight equivalent to an ordinary watercourse consent. This is confirmed in the SoCGs with the host authorities **[EX7/GH8.3.1_C, EX7/GH8.3.2_C, EX7/GH8.3.3_C]**.

3.6.6 The Applicant has submitted updates to the ES Chapter 10 Hydrology, Flood Risk and Drainage **[REP6-007]** and its supporting Appendices **[REP5-021 to REP5-025, APP-100 to APP-106, REP5-027 to REP5-031]** and Water Framework Directive **[REP5-081]** throughout the Examination, with the final updates provided at Deadline 6. The EA has confirmed its formal responses to these submissions in Section 3.3 of the SoCG **[EX7/GH8.3.5_D]** that reflects that the updated documents address all outstanding matters relating to hydrology, flood risk and drainage. The Applicant therefore considers that this issue has been resolved during the Examination. It is also acknowledged that all matters concerning Hydrology and Flood Risk are also agreed with all three host authorities as set out in their respective Statements of Common Ground **[EX7/GH8.3.1_C, EX7/GH8.3.2_C and EX7/GH8.3.3_C]**.

3.7 Traffic and Transport

3.7.1 At the start of Examination traffic and transport were identified as key matters by the Examining Authority and local authorities, and particular concerns relating to construction routing and highway safety were raised. Matters concerning traffic and transport were also raised in the Examining Authority's Written Questions **[PD-007, PD-011, PD-017]** and at Issue Specific Hearings **[EV2-001, EV4-001, EV5-001, EV11-001]**.

3.7.2 The Applicant has engaged proactively with the local authorities and National Highways to address and resolve areas of concern.



- 3.7.3 In response to concerns regarding construction routing, the Applicant submitted a Transport and Access Routes Supporting Document **[REP1-157]**. This document provides clarity on routes to be used by heavy goods vehicles (HGVs), Abnormal Indivisible Loads (AILs) and construction workers, and includes further detail on AIL movements, construction compound four, procedures in the event of flooding, and access arrangements to Green Hill G. Further information on the shuttle bus strategy, together with supporting evidence, was also provided in the Shuttle Bus Service Supporting Document **[REP3-080]**, submitted in response to requests from the local highway authorities.
- 3.7.4 The mitigation measures committed to by the Applicant have evolved throughout the Examination. The Outline Construction Traffic Management Plan **[REP6-055]** has been updated in response to concerns raised, including: clarification of the construction compound strategy following Issue Specific Hearing 2; additional detail on mitigation measures within Sections 5 and 6, also in response to Issue Specific Hearing 2; and the inclusion of specific scenarios where flexibility in working hours may be required, following Issue Specific Hearing 5.
- 3.7.5 Two Glint and Glare Technical Notes were also submitted following concerns raised by West Northamptonshire Council and North Northamptonshire Council, including at Issue Specific Hearings 1 **[EV2-001]** and 2 **[EV4-001]**, regarding the potential impact of glint and glare on local roads. Meetings were held with the respective authorities to agree the scope of assessment. The findings conclude that there would be no significant effects on users of the local road network.
- 3.7.6 Consultation with the relevant highway authority is specified in all relevant Requirements, namely Requirement 15 (construction traffic management plan), Requirement 16 (operational traffic management plan) and Requirement 21 (decommissioning and restoration). In recognition of concerns raised by National Highways that matters such as fencing, dust generation and noise may affect the strategic road network, the outline Construction Environmental Management Plan **[EX7/GH7.1_D]** has been updated to specifically require consultation with National Highways on relevant measures in the vicinity of the strategic road network. This is considered to be a proportionate way to address National Highways' concerns, with the majority of the Scheme not being located near the strategic highway network, and this approach has been agreed in the Statement of Common Ground with National Highways **[EX7/GH8.3.7_B]**. The Applicant is also confident that the amendments made to Schedule 16, ensuring that any consultee named in a Requirement is also consulted on any application to amend documents previously approved by that Requirement, effectively addresses the single outstanding concern of National Highways recorded in the SoCG.
- 3.7.7 The Applicant considers that all matters relating to traffic and transport have now been resolved, with agreement reached with North Northamptonshire Council, West Northamptonshire Council, Milton Keynes City Council and National Highways in respect of the assessment and associated mitigation in the respective Statements of Common Grounds.



3.8 Compulsory Acquisition

- 3.8.1 The Applicant has made good progress with Voluntary Agreements during the Examination and the status of agreements at Deadline 7 is recorded within the Land Right Negotiations Tracker **[EX7/GH4.4_E]**.
- 3.8.2 In relation to the cable route corridor, the Applicant has progressed 67% of the length of the cable route corridor to signed Heads of Terms. The Applicant will continue to progress the remaining following the close of the Examination.
- 3.8.3 During the course of the Examination, the Applicant received confirmation from two Crown entities that they did not hold any interests in the land precautionarily identified as Crown Land. This confirmation was provided in the Land and Rights Negotiation Tracker **[EX7/GH4.4_E]** at Deadline 5 in relation to the Duchy of Lancaster and The Kexby Estate and the Written Summary of the Applicants Oral Submissions at Compulsory Acquisition Hearing 2 **[REP6-069]** in relation to the Department for Transport in respect of the British Railways Board. Accordingly, there is no Crown Land within the Scheme and section 135 of the Planning Act 2008 is not engaged.
- 3.8.4 Notwithstanding any outstanding voluntary agreements, the Applicant has demonstrated that the land and rights being sought are required for the Scheme, and that there is a compelling case in the public interest for compulsory acquisition powers to be granted. All statutory and policy tests for the inclusion of compulsory acquisition powers in the DCO have been met for the reasons set out in the Statement of Reasons (Revision B) **[REP3-027]**.



4 Update on Protective Provisions

- 4.1.1 Since Deadline 6, the Applicant has continued discussions with the statutory undertakers for whom Protective Provisions are provided in Schedule 15 to the draft DCO **[EX7/GH3.1_F]** and where agreement had not yet been reached.
- 4.1.2 Further discussions have taken place with National Grid Electricity Transmission plc (NGET) since Deadline 6. Discussions on the form of protective provisions are well progressed, with only a few matters still to be agreed. The Applicant and NGET are in the process of finalising an associated side agreement. The Applicant and NGET will continue discussions to agree the form of protective provisions, but it is recognised that agreement is unlikely before the close of Examination. The Applicant is committed to continuing discussions with NGET and anticipates that agreement will be reached shortly after the close of Examination. The Applicant will provide an update to the Secretary of State in due course, along with confirmation of the agreed form of protective provisions so that these can be included in any made DCO. On completion of the side agreement, NGET will formally withdraw its objection to the Scheme. In the meantime, the Applicant considers that the protective provisions included in Part 3 of Schedule 16 of the draft DCO submitted at Deadline 7 are sufficient to protect NGET's existing and future apparatus and will ensure that there will be no serious detriment to NGET's undertaking.
- 4.1.3 In respect of National Grid Electricity Distribution (East Midlands) plc (NGED), the protective provisions contained in Part 4 of Schedule 15 to the draft DCO submitted at Deadline 6 are in an agreed form **[REP6-005]**. The Applicant has completed the associated side agreement on 8 April 2026 and understands NGED is separately confirming to the Examining Authority that the protective provisions are agreed.
- 4.1.4 The protective provisions in Parts 5 to 9 of Schedule 15, for the protection of Anglian Water, National Highways, the Environment Agency, Cadent Gas Limited and the Lead Local Flood Authorities are each included in the draft DCO (Revision F) **[EX7/GH3.1_F]** in the agreed forms.
- 4.1.5 For the reasons set out in the Statement of Reasons **[REP3-028]**, the Applicant considers that the protective provisions in Schedule 16 are sufficient to ensure that the tests set out in s127 and s138 of the Planning Act 2008 are satisfied and therefore the Scheme will not result in any serious detriment to the carrying on of the statutory undertakers' undertakings.
- 4.1.6 The Secretary of State has previously determined that the use of compulsory acquisition powers in respect of statutory undertakers' land and rights can be acceptable to ensure the deliverability of a NSIP where it has not been possible to reach agreement on the terms of a voluntary property agreement provided that the technical details of any works are approved by the statutory undertaker. This principle was established in the Secretary of State's decision letter for the National Grid (Hinkley Point C Connection Project) Order 2016 (see paragraph 95 of the decision letter) and reiterated in Secretary of State's decision letter for the Immingham Open Cycle Gas Turbine Order 2020 (see paragraphs 6.6 to 6.23 of the decision letter). The Applicant's position is that the protective provisions contained within Schedule 15 of the draft DCO submitted at Deadline 7 are



sufficient and will ensure there will be no serious detriment to the carrying out of the statutory undertaker's undertaking.



5 Conclusion

- 5.1.1 As set out in the DCO Application and Examination deliverables, and summarised in this Closing Statement, there is a clear and compelling need for the Scheme which substantially outweighs its limited residual adverse effects. The Applicant has provided all necessary information to inform the ExA's Recommendation Report and the Secretary of State's decision making.
- 5.1.2 The proposed Scheme will contribute to meeting the critical need for renewable energy identified in national and local policy, including in the National Policy Statements for Energy, published in November 2023 and designated in January 2024. The NPS's identify the urgent need and unambiguous policy support for low carbon infrastructure.
- 5.1.3 The Scheme is delivering significant beneficial opportunities. These include:
- achieving at least a minimum of 47% gains provided in habitat units, a minimum of 10% gains in hedgerow units and a minimum of 10% gains river units (which is unique to the host authorities given the scale of that opportunity), and supported in policy terms;
 - The Scheme is in compliance with Action Areas three and four in the Connections Action Plan; and
 - The Scheme provides new permissive paths in Green Hill A, A.2, D, E, F and G to benefit residents and enhancement to PRoW's and permissive path user experience through the planting of wide planting buffers and ecological areas, separating users from onsite infrastructure.
 - The Scheme will have a positive impact on green house gas emissions and to national net zero targets, supporting the transition of the national grid to low carbon and renewable sources of energy generation and contributing to climate change mitigation.
- 5.1.4 In response to concerns raised during the Examination, the Applicant has confirmed where the commitments are secured in the relevant management plans regarding ancient woodland buffers and how this will be secured and implemented through the requirement discharge stage.
- 5.1.5 The Applicant considers that suitable protective provisions have been included in Schedule 15 to the draft DCO Revision F submitted at Deadline 7 **[EX7/GH3.1_F]** to address the outstanding concerns raised by statutory undertakers and ensure there will be no serious detriment to their respective undertakings.
- 5.1.6 In conclusion, the benefits provided by the Scheme are significant, clear and compelling, outweighing the identified and limited residual adverse effects.
- 5.1.7 The Applicant would like to thank the Examining Authority and the Planning Inspectorate case team, as well as those individuals and organisations who have contributed to the examination process.