

Green Hill Solar Farm

EN010170

Applicant's Comments on Responses to ExA Third Written Questions

Prepared by: Lanpro Services

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The Infrastructure Planning (Examination Procedure) Rules 2010

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 7

Applicant's Comments on Responses to ExA Third Written Questions

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1 Introduction

- 1.1.1 This document provides Green Hill Solar Farm Limited's (the 'Applicant's') response to submissions made to the Planning Inspectorate (PINS) by 24 March 2026, relating to Examination Deadline 6 for the Development Consent Order Application (the 'Application') for Green Hill Solar Farm (the 'Scheme').
- 1.1.2 This report provides the Applicant's comments on responses to the Examiners Third Written Questions submissions by Host Authorities, Statutory Consultees and Parish Councils.
- 1.1.3 Section 2 of this report is tabulated to include the ExA's question reference number, the response made to the question and the Applicant's follow up response to each question.



2 Applicant's Comments on Responses to ExA Third Written Questions

2.1 National Grid Electricity Transmission [\[REP6-090\]](#)

Reference	ExQ	Question	Response	Applicant's Response
NGET-001	Q3.4.1	<p>Protective provisions in favour of NGET</p> <p>NGET's submission at deadline 4 [REP4-041] states that the protective provisions in their favour in Part 3 of Schedule 15 of the draft DCO [REP3-024] do not contain the necessary future-proofing wording for the protection of the NGET Upgrade Projects (the Weston Marsh to East Leicestershire Project and the Sundon to Grendon Reconductoring Project). Could both parties provide an update on negotiations on this matter, including an indication as to whether you consider a satisfactory resolution will be achieved before the close of the examination.</p>	<p>The parties held a call on Friday 13 March to discuss the interactions between their respective projects which has resulted in positive further engagement between the parties on the protective provisions and a more aligned position. NGET maintains the need to include future proofing wording in the form of protective provisions included in the Order to protect its future projects. However, NGET is confident that an agreement can be reached with the Applicant either before the close of the Examination or shortly thereafter.</p>	<p>The Applicant and NGET continue to discuss the form of protective provisions and a side agreement. The Applicant confirms it is committed to continuing these discussions with NGET following the close of Examination, to enable an agreed form of protective provisions to be included in the DCO as made by the Secretary of State.</p>



2.2 West Northamptonshire Council [\[REP6-083\]](#)

Reference	ExQ	Question	Response	Applicant's Response
WNC-001	Q3.5.1	Historic Environment The draft SoCG submitted at deadline 4 [REP4-029] indicates that a number of cultural heritage matters remain under discussion (CH-03 to CH-08 inclusive). Do you have any concerns that you wish to raise in relation to those matters, which include the heritage assessment, proposed mitigation measures, and archaeological assessment?	The Council can confirm that there are now no outstanding matters in respect of cultural heritage matters and the SoCG has been updated accordingly.	The Applicant notes this comment and refers to the final West Northamptonshire Council Statement of Common Ground [EX7/GH8.3.2_C] which confirms all matters are agreed.



2.3 North Northamptonshire Council [\[REP6-082\]](#)

Reference	ExQ	Question	Response	Applicant's Response
NNC-001	Q3.5.1	<p>Issues awaiting comment in draft Statement of Common Ground</p> <p>The draft SoCG submitted at deadline 4 [REP4-027] indicates that the applicant is awaiting the Council's comments on a number of cultural heritage matters (CH-03 to CH-08 inclusive). Do you have any concerns that you wish to raise in relation to those matters, which include the heritage assessment, proposed mitigation measures, and archaeological assessment?</p>	<p>An updated draft SoCG is submitted at this deadline (6). This updated SoCG updates the Council's position in regard to cultural heritage matters (CH-03 to CH-08 inclusive). CH-03 remains and will need to be a matter disagreed. The Council's view is that the applicant can go further to reduce/remove harm. It is understood that the applicant's position is that this cannot be achieved as it brings the viability of the scheme into question.</p>	<p>As set out in the Statement of Commonality [EX7/GH8.1.16_E], the Applicant has moved matter CH-03 to disagreed and is reflected in the final North Northamptonshire Council Statement of Common Ground [EX7/GH8.3.1_C].</p> <p>The Applicant's position is that extensive consultation with the Council was undertaken and the Applicant has used the advice provided to inform the mitigation proposed as part of the Scheme. The Applicant notes that the Council considers the proposed mitigation to be acceptable, whilst observing that residual harm would remain.</p> <p>Paragraph 5.9.33 of the Overarching National Policy Statement for Energy (EN-1) acknowledges '<i>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 appropriate securing its optimum viable use</i>'.</p> <p>Paragraph 4.2.15 of NPS EN-1 further confirms that "<i>residual impacts are unlikely to outweigh the urgent need for this type of</i></p>



Reference	ExQ	Question	Response	Applicant's Response
				<p><i>infrastructure</i>". Paragraph 4.2.17 confirms that it is presumed that critical national priority infrastructure will meet the test that "<i>substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional</i>".</p> <p>It should be noted that the residual harm identified has been mitigated to a level where it is less than substantial, and the Applicant is therefore confident that the urgent need for renewable energy generation outweighs the residual harm, noting that this would be presumed to be the case even if substantial harm were to occur.</p>
NNC-002	Q3.6.1	<p>Issues awaiting comment in draft Statement of Common Ground</p> <p>The draft SoCG submitted at deadline 4 [REP4-027] indicates that the applicant is awaiting the Council's comments on a number of agricultural matters (ALC-03 to ALC-05 inclusive). Do you have any concerns that you wish to raise in relation to those matters, which include impacts to ALC graded land and soil quality, proposed mitigation measures, and residual effects?</p>	<p>An updated draft SoCG is submitted at this deadline (6). This updated SoCG updates the Council's position in regard to agricultural matters (ALC03 to ALC-05 inclusive). ALC-03 remains and will need to be a matter disagreed. The Council's view is that the 60 year period is more permanent than temporary and therefore results in a loss of BMV land and the impact of this loss is understated.</p>	<p>As set out in the Statement of Commonality [EX7/GH8.1.16_E], the Applicant has moved matter CH-03 to disagreed and is reflected in the final North Northamptonshire Council Statement of Common Ground [EX7/GH8.3.1_C]. The Applicant noted the Council's position of 'the land use change spatially and temporally results in a significant cumulative impact on the loss of BMV agricultural land'. However, as the Council also acknowledge, the loss of BMV land is temporary. The land-use change mostly involves converting arable land to grassland, and the land is not being entirely removed from agricultural use, as</p>



Reference	ExQ	Question	Response	Applicant's Response
				<p>sheep grazing may still take place on most of the Sites, allowing farming activity to continue.</p> <p>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.</p> <p>In addition, as noted above, the conversion of arable land to grassland will have a beneficial effect on soil functions and agricultural land quality. Taking land out of intensive arable farming (e.g., ceasing tillage) is also a common practice used to improve soil structure. This land can therefore be regarded as long-term fallow and as part of a national strategic reserve.</p>
NNC-003	Q3.7.2	<p>Glint and Glare Addendum</p> <p>At Deadline 4, the applicant submitted an addendum to the Glint and Glare assessments to consider the impacts on local roads within NNC's jurisdiction [REP4-026]. Are NNC satisfied that all relevant local roads have now been included and are there any comments on the submitted report?</p>	<p>NNC Highways confirm that on reviewing the addendum to the Glint and Glare assessments to consider the impacts on local roads within NNC's jurisdiction [REP4-026], NNC confirms that this satisfies our requirements. The assessment follows the methodology and screening process that was discussed ahead of carrying it out. The results identify a low impact on road users, and we offer</p>	<p>The Applicant notes this comment.</p>



Reference	ExQ	Question	Response	Applicant's Response
			no alternative conclusions to those contained within the report.	



2.4 Historic England [\[REP6-089\]](#)

Reference	ExQ	Question	Response	Applicant's Response
HE-001	Q3.5.3	<p>Any outstanding issues in relation to archaeology</p> <p>In your relevant representation [RR-1228] and as part of your contributions to Issue Specific Hearing 1 (ISH1) you indicated that further discussions would be taking place between yourselves and the applicant regarding matters relating to archaeology. Could you confirm whether you are now satisfied with the applicant's approach to matters relating to archaeology or are there any outstanding concerns?</p> <p>If you do have any outstanding concerns, could you explain exactly what they are and what actions would be necessary to address those concerns?</p>	<p>In our previous responses to the examination, chiefly our relevant representation [RR- 1228] and response to the examining authority's second written questions [REP4-040] we had outstanding concerns in relation to the project documentation, principally the Archaeological Method Statement (AMS) and draft Development Consent Order (DCO).</p> <p>The applicant has addressed Historic England's previous advice, provided during both pre-application and examination regarding designated heritage assets, through updates to the submitted project documentation. Historic England has not requested further amendments to the assessment and mitigation measures proposed in respect of designated heritage assets.</p> <p>The AMS has been updated throughout the examination period to reflect further information as it is made available and Historic England's comments. We are content that our comments have been addressed within the AMS (version B).</p> <p>The DCO wording of requirement 12 has been updated to address Historic England's Relevant Representation in Revision D.</p> <p>We therefore have no outstanding concerns in relation to archaeology and are working to</p>	<p>The Applicant notes this comment and refers to the final Historic England Statement of Common Ground [REP6-075] which has all matters agreed.</p>



Reference	ExQ	Question	Response	Applicant's Response
			producing an agreed Statement of Common Ground with the applicant.	



2.5 Anglian Water [\[REP6-087\]](#)

Reference	ExQ	Question	Response	Applicant's Response
AW-001	Q3.3.3	<p>Unidentified AW assets</p> <p>In the Relevant Representations submission dated 6 January 2026 [CR-005], it has been highlighted that not all AWS easements and freehold assets which are affected by the scheme in full have been identified. Could both the applicant and Anglian Water provide an update on this matter and whether all outstanding easements and assets will be identified prior to the close of this Examination.</p>	<p>Anglian Water confirms that this matter has been satisfactorily addressed by the Applicant having reviewed the Book of Reference Revision E [REP5-010] and consider all matters resolved relating to our assets. This has also been reflected in the final and signed version of the Statement of Common Ground which is to be submitted into Examination.</p>	<p>The Applicant notes this comment and refers to the final Anglian Water Statement of Common Ground [REP6-079] which has all matters agreed.</p>
AW-002	Q3.4.3	<p>Protective provisions in favour of Anglian Water</p> <p>The draft SoCG [REP2-064] indicates that bespoke protective provisions have been agreed, and that these will be included in the revised draft DCO at deadline 3. There appear to have been no changes made to Part 5 of Schedule 15 in [REP3-024]. As the wording in the draft SoCG is somewhat ambiguous, could you confirm whether any changes need to be made to Part 5 of Schedule 15 as part of agreeing protective provisions or whether Anglian Water were satisfied with the existing wording of Part 5 of Schedule 15 in the previous iteration of the draft DCO [CR1-014]?</p>	<p>Anglian Water confirms that bespoke Protective Provisions have been agreed between parties. No changes have been made to Part 5 of Schedule 15 since the agreed form of wording was included in Revision A of the draft DCO. This has also been reflected in the final and signed version of the Statement of Common Ground which is to be submitted into Examination.</p>	<p>The Applicant notes this comment and refers to the final Anglian Water Statement of Common Ground [REP6-079] which has all matters agreed.</p>



2.6 Milton Keynes County Council [\[REP6-081\]](#)

Reference	ExQ	Question	Response	Applicant's Response
MK-001	Q3.2.12	<p>Bat surveys</p> <p>Given the concerns raised at paragraph 4.15 of Milton Keynes City Council's LIR [REP1-169] regarding the adequacy of bat surveys with particular regard to barbastelle bats, should further surveys be required in order to establish any necessary measures to protect the species?</p>	<p>MKCC's main concern centred around Threshires wood, and the commuting corridor identified by SD41 to the south of the ancient woodland. The concern was that the ancient woodland has the potential to support a maternity roost as the number of Barbastelle recorded was substantial for Milton Keynes. During a meeting with the applicant's ecologist on 20th January 2026, the ecologist confirmed no works within 20m of the identified Barbastelle commuting corridor or connected ancient woodland would take place. This buffer is considered adequate to protect Barbastelle if they continue to use the corridor during construction and operation, even in the worst-case scenario (i.e. a maternity roost is present either within the woodland or within trees along the commuting corridor). Whilst it would be beneficial to understand whether a maternity roost is present nearby, it would not be necessary to establish protection measures in Site G if the worst case is assumed. The MKCC Ecologist requested the buffer be made as wide as possible if there was any scope to</p>	<p>The Applicant refers to the response to Q3.2.12 in the Applicant's Response to ExA Third Written Questions [REP6-061] which confirms that as per the Milton Keynes City Council Statement of Common Ground (Revision C) [EX7/GH8.3.3_C], a meeting was held on 20/01/2026 where this matter was discussed. It was agreed that further surveys would not have materially affected the assessment or the mitigation measures proposed. This matter is agreed in the Statement of Common Ground.</p>



Reference	ExQ	Question	Response	Applicant's Response
			adjust the positioning of the panels close to the commuting corridor.	
MK-002	Q3.2.15	<p>Effects on barbastelle bat</p> <p>Milton Keynes City Council [REP3-085] raise significant concern that the adjacent woodland and linking boundary features at Site G are of high importance to barbastelle bats, an Annex II species typically considered very rare nationally. Static bat detector surveys (Figure 9.6.7 Bat Static Detector Locations (Green Hill G)) in Appendix 9.6 Bat Surveys (Revision A) [REP1-047] recorded high levels of barbastelle bat activity at location SD38 on the western boundary of Site G (as set out in the applicant's response to MKC 4.15 of the Applicant's Responses to Local Impact Report Responses [REP4-018]). Location SD38 is at the end of a small belt of woodland and across the A509 road from the Barslay Spinney ancient woodland and adjoining hedgerow.</p> <p>The Bat Surveys document states that linear features such as hedgerows and small woodland blocks provide bat flight paths and foraging resources. It states that broadleaved woodland</p>	<p>In the absence of survey work to understand how bats utilise the CRC, it is difficult to accurately predict the impacts which may occur to the protected species in the absence of mitigation. Habitats, however, may be impacted by the proposed works if works such as boring, drilling, tunnelling, laying of hardstanding or tracking of heavy machinery occur within the RPA of habitats such as hedgerows, trees and woodland. Impacts to root systems can kill vegetation and thus, impact the linear connectivity of wildlife corridors. Equally, if lighting is used close to these features, this may impact light sensitive species such as Barbastelle, the worse case being such species avoid the affected areas altogether or abandon any roosts which may be present. Noise, vibration and dust may also have an impact.</p> <p>In the absence of survey information, if presence of protected species is assumed at a level similar to that identified in Site G, particularly at SD38, it is considered harm to protected species may occur from the proposed</p>	<p>The Applicant refers to the response to Q3.2.1 in the Applicant's Response to ExA Third Written Questions [REP6-061]. The presence of valuable ecological features was factored into the final siting of the Cable Route Corridor, however given that impacts from the cable route installation will be temporary and affected habitats will be reinstated as per Method Statement 6 of the Outline Ecological Protection and Mitigation Strategy (OEPMS) [EX7/GH7.5_E], figures highlighting protective buffers on the Cable Route Corridor have not been prepared.</p> <p>It is however confirmed that a minimum 15m protective buffer will be applied and implemented for all ancient woodland parcels within the Cable Route Corridor (including Barslay Spinney), as per the Arboricultural Impact Assessment and Outline Arboricultural Method Statement (AIA and AMS) [REP6-015], the Outline Ecological Protection and Mitigation Strategy (OEPMS) [EX7/GH7.5_E], and Outline Construction Environmental</p>



Reference	ExQ	Question	Response	Applicant's Response
		<p>offers a high-quality foraging habitat for bats.</p> <p>A tree with a high suitability for roosting bats was recorded (Figure 9.6.14 Bat Ground Level Tree Assessment Results (Green Hill G)) in [REP1-047] in close proximity to location SD38. Trees with moderate suitability for roosting bats were identified in Barslay Spinney and within the Cable Route Corridor (CRC) to the west of the spinney (9.6.19 Bat Ground Level Tree Assessment Results (Cable Route 5 of 5) [REP1-047]. Bat activity surveys were not carried out within the CRC.</p> <p>Work No 5B for the CRC passing west from the A509 road close to location SD38, and adjacent to the Barslay Spinney ancient woodland and a hedgerow to its west, comprises works to lay electrical cables including laying down of access tracks, roads, drainage infrastructure, cable laying, tunnelling, boring and drilling works and temporary construction and decommissioning laydown areas which may include areas of hardstanding, car parking, materials and equipment storage, site and welfare offices and</p>	<p>works in the absence of mitigation or ecological buffers. Further survey work to the CRC would be required to inform mitigation or potential licensing requirements if bat roosts in trees were to be affected. Implementation of ecological buffers would be preferred.</p>	<p>Management Plan (OCEMP) [EX7/GH7.1_D].</p> <p>The matters raised are clarified in a revised version of the ES Chapter 9: Ecology and Biodiversity [REP6-013] submitted at Deadline 6.</p>



Reference	ExQ	Question	Response	Applicant's Response
		<p>workshops. A temporary haul route would be implemented alongside the cable route (Outline Ecological Protection and Mitigation Strategy (Revision B)) [REP4-010], Section 3.4, which would require the use of HGVs to construct.</p> <p>The CRC would contain no ecological buffers, as set out in the Schedule of Protective Ecological Buffers [APP-095]. As features such as the ancient woodland and adjoining line of hedgerow and trees across the road from location SD38 may provide flight paths and foraging resources for the barbastelle bat, do you consider that the absence of ecological buffers to these features adjacent to the CRC may result in harm to the protected species and relevant habitat?</p>		
MK-003	Q3.7.4	<p>Statement of Common Ground</p> <p>In the latest SoCG, Revision A [REP4-031] all Landscape and Visual matters appear to still be 'under discussion' with the position stated as 'the applicant awaits the Council's comments'. Please can you provide an update on the progress of discussions and indicate if it is likely that these will</p>	<p>The requested additional viewpoints for Site G were published 02/03/2026, as well as additional viewpoints as part of the Change 2 application published 18/02/2026, and the additional viewpoint of the PRow sent by the applicant 18/03/2026 (due to be published at Deadline 6) . The MKCC Landscape Architect has reviewed the documents and updated specific points</p>	<p>The Applicant refers to the response to Q3.7.4 in the Applicant's Response to ExA Third Written Questions [REP6-061].</p> <p>As set out in the Milton Keynes City Council Statement of Common Ground (Revision C) [EX7/GH8.3.3_C] there are three landscape matters which are agreed</p>



Reference	ExQ	Question	Response	Applicant's Response
		be resolved prior to the close of the Examination.	with the latest draft SoCG (expected to be submitted at Deadline 6). In summary, MKCC continue to object to the inclusion of fields GF9 and GF13, due to their inclusion with the Special Landscape Area. Many of the areas around methodology are agreed, however, the landscape character study Milton Keynes Review of Local Landscape Designations report May 2024, has not been properly considered. In general, comments remain as per the MKCC Local Impact Report. MKCC disagree that the effects on landscape would result in only Moderate / Minor Adverse effects, on areas assessed as special landscape, at Year 15 and at decommissioning. The proposal will permanently remove open views across countryside and Special Landscape Area.	<p>between the parties which relate to baseline condition, the study area/scope of assessment and the viewpoints for the cable route corridor being acceptable to inform the baseline.</p> <p>All other matters are disagreed. The Applicant has sought to undertake a constructive and proactive approach to consultation with the MKCC landscape officer but there has been limited engagement from the MKCC landscape officer.</p> <p>The Applicants position in relation to GF9 and GF13 is set out in the Applicant's response to Q3.7.3 in the Applicant's Response to ExA Third Written Questions [REP6-061].</p>



2.7 National Highways [REP6-092]

Reference	ExQ	Question	Response	Applicant's Response
NH-001	Q3.3.4	<p>Additional Plot 12-128-b</p> <p>In the Relevant Representation [CR-006] in respect of the CA of additional land, National Highways (NH) have raised objections to the compulsory purchase powers over this plot. Are discussions ongoing on this point and please could the applicant address NH's objections and indicate if they are likely to be resolved prior to the close of this Examination?</p>	<p>National Highways land interest in this plot is in fact limited to the operational highway as noted in the Book of Reference. National Highways can also confirm that protective provisions have now been agreed with the Applicant that revise paragraph 58(3) of Part 6 of Schedule 15 (Protective Provisions for the protection of National Highways) to remove the words "save in emergency". The effect of this paragraph is that compulsory acquisition powers will not be exercised without National Highways' prior approval. This therefore removes National Highway's concern with the inclusion of this plot.</p> <p>National Highways concerns with the proposals are now solely limited to certain Requirements as explained in the summary of the oral representations made at Issue Specific Hearing 6.</p>	<p>The Applicant notes this comment and is in agreement that matters relating to plot 12-128-b are resolved.</p> <p>The Applicant added updates to Table 3.7 in the Outline Construction Environmental Management Plan [EX7/GH7.1_D] which requires communication with National Highways when works are in close proximity or adjacent to the SRN. This is an agreed position between the parties as set out in the National Highways Statement of Common Ground [EX7/GH8.3.7_B] submitted at Deadline 7.</p>



2.8 Cogenhoe and Whiston Parish Council [\[REP6-084\]](#)

Reference	ExQ	Question	Response	Applicant's Response
CWPC-001	Q3.9.5	<p>Village Hopper bus service route map request</p> <p>Please provide a full route map for the Village Hopper bus service referred to in your representation [REP4-037].</p>	<p>You will see from the map that the Village Hopper runs from Northampton along the A428 to Brafield-on-the-Green, then via Cogenhoe, Whiston, Castle Ashby, Past the existing substation into Grendon, to Easton Maudit, Bozeat, Wollaston and then into Wellingborough and onto Rushden Lakes. Much of the route would be affected by construction traffic and access points which could cause delays and disruption to our passengers. As this is a time-tabled service it needs to run on time and in a reliable manner as passengers rely on us to get them to work, school, hospital appointments etc. Furthermore, because we operate a passenger contract for North Northants council we can be fined by them for consistently being late, we are monitored against our timetable to ensure the service we are being paid to operate runs professionally and on time. We have grave concerns about how the constructions traffic both for the BESS and the solar panel installation as shown in the transport study area, particularly the access points, will affect our service and the disruption this will cause for residents. The application</p>	<p>The Applicant refers to their response to Q3.9.4 in the Applicant's Responses to ExA Third Written Questions [REP6-061] which provides an overview of how the Scheme will interact with the Village Hopper bus route and mitigation measures set out in Outline Construction Traffic Management Plan (Revision C) [REP6-055].</p> <p>The Applicant seeks to highlight that the route shown on [REP6-084] only shows one version of the Village Hopper route between Cogenhoe and Grendon, and does not show the route used by the Village Hopper where it accesses Whiston and Castle Ashby during the majority of the working day. The timetable (dated 13th October 2025) sets out that at the following times the Village Hopper would avoid Station Road, bypassing the route used by HGV traffic accessing the Green Hill BESS site:</p> <ul style="list-style-type: none">• Outbound: 10:55-11:00 (by request only), 12:30-12:39, 14:44-14:53 or 14:54-15:03, and 16:30-16:39;• Inbound: 09:08-09:17, 12:37-12:46, 14:07-14:16, and 17:12-17:21 (by request only). <p>The indicative route of this section, as inferred from the timetable at: https://www.cogenhoeandwhiston-pc.gov.uk/village-hopper-bus has been shown at the end of this table (extract from Google Maps).</p>



Reference	ExQ	Question	Response	Applicant's Response
			<p>doesn't propose sufficient measures to protect or maintain rural transport services like the Village Hopper during peak construction, nor explain how such services will be preserved — this falls short of the NPPF's sustainable transport aims. Furthermore, whilst Green Hill's Environmental Statement assesses transport effects at a general level, it does not specifically assess impacts on rural bus connectivity and community transport services such as ours.</p>	



- The Royal Oak PH, Cogenhoe, Northamp
 - The Green, Northampton NN7 1NN
 - Castle Ashby Bus Shelter, Castle Ashby, N
 - Parsons Close, Grendon, Northampton N
- Add destination

Options

9 min
Fastest route, the usual traffic 4.2 miles
[Details](#) [Preview](#)

Explore nearby Parsons Close

- restaurants
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- Petrol stations
- Car Places
- More





2.9 Trescella Claudette Elderton & Ben Elderton [\[REP6-109\]](#), [\[REP6-103\]](#)

Reference	ExQ	Question	Response	Applicant's Response
TCEBE-001	-	-	<p>We are instructed on behalf of Trescella and Ben Elderton, trading as FC & CC Elderton of Glebe Farm, Great Doddington, Earls Barton, Northamptonshire, to respond to the Examining Authority's Third Written Questions (ExQ3).</p> <p>These responses are made without prejudice to the submission of further representations, whether for different reasons or in amplification of the matters set out below.</p>	The Applicant notes this comment and has responded to the comments made in full below.
TCEBE-002	Q3.9.6	<p>Effects on Glebe Farm/The Meadows business</p> <p>Please explain any evidence which supports the assertions regarding the proposed development's potential effect on the viability of both the agricultural and farm shop elements of the Glebe Farm/The Meadows business.</p>	<p><u>Introduction</u></p> <p>Glebe Farm, operated by FC & CC Elderton, comprises a diversified rural enterprise including arable production, horticultural and vegetable growing, and a direct-to-consumer farm shop and greengrocery business. The enterprise operates as an integrated rural undertaking in which the retail element provides a critical market for horticultural produce and underpins the financial viability of the wider agricultural operation. In turn, agricultural and horticultural activities rely upon shared infrastructure, machinery and labour resources which are sustained by the stability of retail income. The farm shop is a</p>	<p>The Applicant has sought to directly engage with FC & CC Elderton throughout the pre-application and examination process and respond to the written representations made to the examination.</p> <p>Please therefore refer to Section 6.3 of The Applicant's Responses to Written Representations at Deadline 1 [REP2-048] and Section 2.3 of the Applicant's Response to Deadline 3 Submissions [REP4-022].</p>



Reference	ExQ	Question	Response	Applicant's Response
			<p>critical component in ensuring overall business sustainability.</p> <p>This representation addresses potential impacts arising from:</p> <ul style="list-style-type: none"> • Construction traffic and associated traffic management measures • Temporary land occupation, including the proposed construction compound • Cable route works and associated disruption • Loss of customer accessibility and passing trade 	
TCEBE-003			<p><u>Business Structure and Economic Role</u></p> <p>The business supports multiple employees, two farming households reliant on business income, and a weekly customer base of approximately 350–400 local households.</p> <p>The farm shop element represents approximately 60% of total business turnover and provides the most stable income stream, mitigating volatility inherent in primary agricultural production.</p> <p>The business therefore constitutes a local rural employer, a provider of local food resilience and short supply chains, and a diversified agricultural enterprise aligned with national rural policy objectives.</p>	<p>The Applicant notes this comment and confirms that the business at Glebe Farm has not been individually assessed as a receptor in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]. This reflects the scale of the Scheme, for which the assessment of individual businesses that are not specifically tourism attractions or recreation facilities would be disproportionate to the likely significance of effects anticipated. This approach to assessment was confirmed in the EIA Scoping Opinion by the Planning Inspectorate [REP1-035] and is agreed by the relevant host local authority in the final North Northamptonshire Council</p>



Reference	ExQ	Question	Response	Applicant's Response
				Statement of Common Ground [EX7/GH8.3.1_C].
TCEBE-004			<p><u>Access-Related Viability Impacts</u></p> <p>A substantial proportion, estimated to be approximately two-thirds (66%) of customers currently access the farm shop via the B573 corridor from the East, including from Wilby, Great Doddington, Wellingborough and Wollaston.</p> <p>Disruption to this route during construction (potentially up to 3-years) has the potential to:</p> <ul style="list-style-type: none"> • Increase journey times and inconvenience for customers • Reduce impulse and passing trade • Create a perception of inaccessibility or congestion • Result in permanent loss of established customer patterns <p>Despite requests, no detailed or quantified traffic management programme has been provided to FC & CC Elderton. This information was last requested at a meeting with the Applicant and their representatives on 8 January 2026 and followed up by email on 9 January 2026. The absence of this information prevents a robust assessment of:</p>	<p>The Applicant refers to their response to Q3.9.3 in the Applicant's Responses to ExA Third Written Questions [REP6-061].</p> <p>While it is recognised that highway works between Glebe Farm and the junction of Doddington Road (B573) and the A45 would have some degree of inconvenience to road users, the Applicant is confident that there are sufficient mitigation measures to ensure that this does not have a significant effect on accessibility to the business at Glebe Farm. Any temporary traffic management would be agreed with the relevant highway authority, which will ensure unacceptable delay to road users does not occur.</p> <p>The Applicant furthermore seeks to confirm that works to construct the entire Cable Route Corridor are anticipated to take no more than 18 months in total, not three years. Work will not be consistent across this period, there will be periods of higher and lower activity. The cabling works required to cross Doddington Road are likely to take one to two weeks.</p> <p>Traffic management measures in relation to construction access points and cable construction works have been set out in the Outline Construction Environmental</p>



Reference	ExQ	Question	Response	Applicant's Response
			<ul style="list-style-type: none"> • Duration of disruption • Severity of access constraints • Peak construction traffic intensity • Effectiveness of signage or mitigation measures <p>In the absence of such clarity, the business faces material uncertainty regarding trading continuity for potentially up to 3-years (being the construction period). At the aforementioned meeting, the Applicant's representative suggested vehicle movements would be limited, with an indication of approximately 10 vehicles per day. However, this appears inconsistent with earlier information provided to FC & CC Elderton suggesting up to 30 articulated HGV movements per day, in addition to approximately 100 work vans and other site traffic.</p>	<p>Management Plan (Revision C) [EX7/GH7.1_D] and the Outline Construction Traffic Management Plan (Revision C) [REP6-055], and are thereby secured through Requirements 13 and 15 respectively of Schedule 2 to the final Draft DCO [EX7/GH3.1_F]. This includes the requirement for detailed provisions to be <i>'submitted to and approved by the relevant planning authority'</i> in <i>'consult[ation] with the relevant highway authority'</i>.</p>
TCEBE-005			<p><u>Economic Evidence and Viability Methodology</u></p> <p>In assessing the potential effect of the Proposed Development on the viability of the business, a structured rural enterprise viability approach has been applied.</p> <p>The enterprise functions as an integrated diversified operation, where agricultural production underpins retail activity and the farm shop provides income stability to</p>	<p>Where direct impacts to productive agricultural land are anticipated from cable construction works and the placement of the construction compound, these losses will be compensated through voluntary agreement between the Applicant and the respective persons with interests in the affected land, or will be compensated through compulsory acquisition payment if voluntary agreement cannot be reached.</p>



Reference	ExQ	Question	Response	Applicant's Response
			<p>support ongoing farming. Labour, machinery and overhead costs are shared across the undertaking.</p> <p>Diversified rural enterprises typically operate on relatively narrow margins with a high proportion of fixed costs and limited short-term flexibility to absorb sustained reductions in income. They also depend heavily on established customer patterns and efficient land management. The business exhibits these characteristics and is therefore sensitive to prolonged reductions in trade and operational disruption during the construction period.</p> <p>The farm shop is particularly sensitive to route convenience, perceived accessibility (especially for older and less able clientele) and established customer travel patterns, as well as passing trade linked to strategic road connections. Experience within rural retailing indicates that disruption to established access routes can lead to disproportionate reductions in customer visits and may result in longer-term loss of trade.</p> <p>On an indicative sensitivity basis, a sustained reduction in farm shop turnover in the order of approximately:</p> <ul style="list-style-type: none"> • 5% would materially reduce retained profitability 	<p>The considerations for construction compounds are significantly greater than that of agricultural rates therefore ensuring the landowner is compensated for the loss of agricultural activities.</p> <p>The decision of whether cable installation works across the B573 Doddington Road are to be undertaken by open-cut trenching or by horizontal directional drilling will be determined at the detailed design stage, post-DCO consent. The Applicant estimates the open-cut trench would take approximately one to two weeks to complete.</p> <p>Traffic management measures in relation to cable construction works have been set out in the Outline Construction Environmental Management Plan (Revision C) [EX7/GH7.1_D] and the Outline Construction Traffic Management Plan (Revision C) [REP6-055], and are thereby secured through Requirements 13 and 15 respectively of Schedule 2 to the final Draft DCO [EX7/GH3.1_F]. The Applicant is confident that with these measures in place, no significant effect to driver delay, and thus on customer access to the business, is anticipated.</p>



Reference	ExQ	Question	Response	Applicant's Response
			<ul style="list-style-type: none"> • 10% would significantly constrain normal business viability • 15% or greater would be capable of eliminating normal annual surplus <p>Such reductions may reasonably arise where customer access patterns are disrupted over an extended construction period.</p> <p>Temporary land occupation and cable works introduce direct loss of productive area, fragmentation of operational land blocks, increased management complexity and potential residual impacts on soil condition and yield performance.</p> <p>During the aforementioned meeting, we requested that the section of cable crossing the B573 is directional drilled rather than open-cut to avoid further disruption. That request was acknowledged. We reiterate that request.</p> <p>The combined effect of construction traffic, traffic management measures, and compound activity must be considered together, as these may affect both agricultural efficiency and customer accessibility.</p> <p>In the absence of detailed construction methodology, confirmed traffic volumes, and agricultural mitigation proposals, a</p>	



Reference	ExQ	Question	Response	Applicant's Response
TCEBE-006			<p>precautionary professional assessment indicates a credible risk to the ongoing viability of the enterprise during construction.</p> <p>Route Alignment</p> <p>The Applicant has previously been requested to align the proposed cable route, so far as reasonably practicable, with the existing overhead electricity corridor. Such an approach would materially reduce the extent of land sterilised. This remains a key mitigation measure and is therefore formally reiterated.</p> <p>The Applicant is aware that FC & CC Elderton have an interest in land with consent for gravel extraction which is affected by the Proposed Development. The definitive route across this land has not yet been finalised. Prior to finalisation, it is requested that the Applicant engages with FC & CC Elderton and gives proper consideration to reasonable mitigation measures to minimise the impact of the Proposed Development.</p>	<p>The Applicant confirms that the cable route corridor has been routed along field boundaries to reduce impacts to farming. Where the overhead transmission lines (OHLs) intersect fields, the cable route corridor has been routed beside this infrastructure as far as practicable to minimise additional land sterilisation whilst maintaining separation distances from the OHLs. Micrositing of the final cable route within the ~50 m corridor will be undertaken as part of the detailed design stage.</p> <p>The Applicant confirms it is aware that FC & CC Elderton have an interest in land with consent for gravel extraction and will continue to engage with FC & CC Elderton through the detailed design stage to ensure impacts on mineral sterilisation are minimised.</p> <p>The Applicant met with representatives of Storefield on 1st April 2026 to discuss the minerals extraction on the land the Eldertons have an interest in, an update is provided in Response to Rule 17 Request for Further Information [EX7/GH8.1.54]</p>



Reference	ExQ	Question	Response	Applicant's Response
TCEBE-007			<p>Professional Viability Conclusion</p> <p>In my professional opinion, based on the structure and operating characteristics of the enterprise, the proposed development introduces a credible and material risk to the ongoing viability of both the agricultural and retail components of the business.</p> <p>The farm shop forms the principal income stream within the diversified farming business. Sustained disruption to customer accessibility during the construction phase represents a realistic threat to the business leading to reduced turnover. Given the relatively high proportion of fixed operational costs typical of such enterprises, even moderate reductions in retail income have the potential to disproportionately affect retained profitability.</p> <p>In parallel, temporary land occupation, cable installation works and associated operational disruption are likely to affect the efficiency and productivity of the agricultural enterprise. While individual impacts may be capable of mitigation or compensation in isolation, the cumulative effect on a relatively small-scale rural business must be considered in the context of overall enterprise sustainability.</p>	<p>The Applicant notes these comments and has sought to respond to each point as raised in the responses above.</p> <p>The Applicant is confident that through the mitigation measure secured through the Outline Construction Environmental Management Plan (Revision D) [EX7/GH7.1_D] and the Outline Construction Traffic Management Plan (Revision C) [REP6-055], secured through Requirements 13 and 15 respectively of Schedule 2 to the final Draft DCO [EX7/GH3.1_F], and through the provision of voluntary agreement on direct impacts to agricultural land use, that the long-term viability of the business at Glebe Farm will not be significantly adversely affected by the construction of the Scheme.</p>



Reference	ExQ	Question	Response	Applicant's Response
			<p>The evidence presented demonstrates that the business operates on margins where sustained disruption to either trading conditions or agricultural productivity may materially affect its long-term viability.</p> <p>It is concluded that, without appropriate mitigation, and protection of customer access, the proposed development gives rise to a reasonable prospect of material adverse effect on the viability of this established rural business.</p>	