

Green Hill Solar Farm

EN010170

The Applicant's Response to Deadline 6 Submissions

Prepared by: Lanpro

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 7

The Applicant's Response to Deadline 6 Submissions

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1.1 Introduction

- 1.1.1 This document provides Green Hill Solar Farm Limited (the 'Applicant's') response to Written Representations (WRs) submitted by Interested Parties to the Planning Inspectorate (PINS) by 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 A total of 8 WRs and other documents were submitted to the Examining Authority by Interested Parties in response to the Scheme. WRs were published on 26 March 2026 to the Planning Inspectorate's website (PINS reference: EN010170).

1.2 Structure of the Report

- 1.2.1 This document provides a response from the Applicant to the matters raised in those WRs and other documents received.
- 1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Green Hill Solar Farm [Examination Library](#).
- 1.2.3 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 6 to the Planning Inspectorate.

Table 2.1: List of Acronyms for Submission Documents

Acronym	Document Name
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
PRA	Preliminary (Geo-Environmental) Risk Assessment
OCEMP	Outline Construction Environmental Management Plan
OOEMP	Outline Operational Environmental Management Plan
ODS	Outline Decommissioning Statement
OLEMP	Outline Landscape and Ecological Management Plan
OEPMS	Outline Ecological Protection and Mitigation Strategy
OSMP	Outline Soil Management Plan
OBSSMP	Outline Battery Storage Safety Management Plan
OSSCEP	Outline Skills Supply Chain and Employment Plan
OCTMP	Outline Construction Traffic Management Plan



Acronym	Document Name
OPROWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
CDPP	Concept Design Parameters and Principles
EqIA	Equality Impact Assessment
HRA	Habitat Regulations Assessment
OOTMP	Outline Operational Traffic Management Plan



2 Applicant's Responses to Deadline 6 Submissions

2.1 Grendon Parish Council

Table 2.1: [REP6-086](#) and [REP5-085](#)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
Deadline 6 Submission [REP6-086]				
GrPC-001	Transport and Access	Construction Traffic	<p>We, Grendon Parish Council have grave concerns over the proposed siting of the Compound site off the Yardley road, Grendon and the expected increase in traffic this will bring about. During your visit to Grendon, you will have seen the parking and the resulting restricted carriage way width along Main Road. Normal traffic levels often causes traffic jams here, with HGV's and buses needing to encroach on to the pavement in order to pass.</p> <p>I have attached a photo clearly showing an example of this.</p> <p>This makes it extremely dangerous for pedestrians, school children walking to and from school and when going to the playing field. We therefore consider the siting of such compound is inappropriate and dangerous and should be disallowed.</p>	<p>The access to the compound from Yardley Road will not be used by HGV construction traffic associated with the Cable Route Corridor where access will be from Station Road.</p> <p>The Outline Construction Traffic Management Plan (Revision C) [REP6-056] makes specific provision to manage movements outside of times that coincide with local schools (highlighting Grendon Primary School) and sports facilities (with specific reference to Grendon Football Club).</p>



Further comments to Deadline 5 Submission [REP5-085]				
GrPC-002	Hydrology and Flood Risk	Grendon Flooding	<p>Grendon Parish Council objects to the applicant's revised Flood Risk Assessment in respect of the proposed BESS and substation areas at Grendon, because its conclusions materially understate the actual flood risk on the ground and fail to reflect both mapped flood constraints and the demonstrated flooding history of the site and its surroundings.</p>	<p>The Applicant notes the concerns raised regarding the representation of flood risk at Grendon.</p> <p>Flood risk has been assessed in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007], supported by the Flood Risk Assessment and Drainage Strategy suite. The assessment is based on site-specific analysis of flood risk, including hydraulic modelling, rather than reliance solely on national mapping datasets.</p> <p>The conclusions of the assessment are derived from modelled flood extents, levels and flow routes for a range of design events, including the 1% annual probability event with an appropriate climate change allowance. These return periods represent the relevant basis for assessing development safety and flood risk in accordance with national policy and guidance.</p> <p>On that basis, the assessment does not understate flood risk but reflects a detailed, site-specific understanding of flood behaviour across the Order Limits.</p>
GrPC-003	Hydrology and Flood Risk	Grendon Flooding	<p>In the above document, the applicant's mapping of BESS 2 and associated substations, is shown within Flood</p>	<p>The Applicant acknowledges that the Environment Agency Flood Map for Planning identifies areas of Flood Zones</p>



			<p>Zones 2 and 3, with the majority of that field falling within Flood Zone 3. (Fig 7, section 2.1 EA's Flood Map for Planning).</p> <p>In plain terms, this is land recognised as being at significant risk from fluvial flooding. It is therefore very difficult to reconcile that mapped position with the applicant's attempt to describe BESS 2 as presenting "low risk" as per 2.7.1. in the same document.</p> <p>The below photographs were taken in November 2024, several weeks after the peak of the floods in September 2024. (please see photographs 1&2)</p>	<p>2 and 3 within the wider land parcel, including areas associated with BESS 2.</p> <p>The Flood Map for Planning is a national screening dataset and does not define site-specific flood extents. As set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007], detailed assessment has been undertaken using site-specific modelling and topographic data to define the actual extent of flooding during the design event.</p> <p>This assessment demonstrates that the developable areas of BESS infrastructure are located outside the modelled 1% annual probability flood extent including climate change. The reference to "low risk" relates to this site-specific assessment rather than the indicative Flood Map for Planning.</p> <p>This distinction between national mapping and detailed assessment is standard practice and is applied consistently across the Scheme.</p> <p>The photographs submitted by the Parish Council are noted. The images appear to show that the areas proposed for BESS infrastructure are not flooded. This is consistent with the findings of the site-specific flood risk assessment, which demonstrates that the principal</p>
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				<p>BESS infrastructure is located outside modelled fluvial flood extents, with only limited areas of shallow flooding predicted elsewhere within the wider land parcel. It should be noted that the approach to and outcome of hydraulic modelling has been agreed with the Environment Agency, as outlined in the Environment Agency Statement of Common Ground [EX7/GH8.3.5_D].</p>
GrPC-004	Hydrology and Flood Risk	Grendon Flooding	<p>The revised assessment does not appear to give proper weight to the actual flooding record in this area. The applicant acknowledges a historic flood event affecting the eastern BESS 1 area in 1947! That is not an isolated or purely historic concern and is heavily misleading, which has been pointed out to the applicant on many an occasion.</p>	<p>The Applicant acknowledges the historical flood information referenced.</p> <p>The Flood Risk Assessment considers available historical flood records alongside modelled flood extents, as set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007]. Historic events, including those referenced, are used to inform understanding of flood mechanisms but do not replace the need for a consistent, modelled assessment of design flood events.</p> <p>The assessment therefore considers both historical evidence and modelled conditions, with the latter forming the basis for evaluating development safety and compliance with policy.</p> <p>There is no reliance on isolated historic events in deriving the conclusions of the assessment.</p>



GrPC-005	Hydrology and Flood Risk	Grendon Flooding	<p>The Environment Agency's September 2024 flooding presentation, attached, records that Grendon has previous flood history in 2024, 2012, 1998 and the 1980s. However, The Environment Agency only concerns itself with displacement or threat to life events, as Parish Council, we can state that the Village and environs have flooded many more occasions than that in recent times i.e. 2024, 2023, 2020, 2016, 2012.</p>	<p>The Applicant acknowledges the Environment Agency's September 2024 flooding information and the wider flood history of the Grendon area, including the Environment Agency Grendon Flooding Presentation (October 2024). The occurrence of flooding within the wider catchment is not in dispute and has been taken into account as part of the baseline.</p> <p>The Flood Risk Assessment, as set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007], incorporates Environment Agency data, including the September 2024 material, as the best available evidence of flood behaviour alongside recorded flood history. This information is used to inform understanding of flood mechanisms affecting the site.</p> <p>However, the assessment of risk to the Scheme is based on site-specific hydraulic modelling at the location of the proposed development, using defined design events including the 1% annual probability event with an appropriate allowance for climate change. This provides the appropriate and policy-compliant basis for determining flood risk to the Scheme.</p>
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				<p>These modelled events represent a range of flood magnitudes, including extreme events, and therefore account for the type of flooding described in the Environment Agency material where it is relevant to the Site.</p> <p>On that basis, while the Parish Council's record of additional flood events provides local context, it does not alter the conclusions of the site-specific flood risk assessment. The proposed BESS infrastructure areas are located outside the modelled flood extent for the design event including climate change and are therefore not expected to be affected by fluvial flooding.</p>
GrPC-006	Hydrology and Flood Risk	Grendon Flooding	<p>The principal concern in Grendon is, and always has been, fluvial flooding, including the interaction between watercourses, flood storage behaviour and local topography. The Environment Agency's September 2024 presentation specifically refers to Flood Storage Areas – Grendon Brook and records that emergency spillways were used at Yardley Hastings East and North during the September 2024 event. That evidence reinforces the reality that this wider catchment was under severe pressure and cannot be treated as benign.</p>	<p>Fluvial flood mechanisms, including the interaction of watercourses, flood storage behaviour and topography, are explicitly considered within ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007] and the supporting Flood Risk Assessment. The assessment is based on hydraulic modelling which represents these processes across the wider catchment.</p> <p>Recent flood events, including September 2024, reflect extreme rainfall conditions but do not supersede the requirement to assess development against defined design events with</p>



			<p>The Environment Agency report also includes draft flood-event mapping for Lower End, Grendon, showing a clear flood outline associated with the September 2024 event.</p> <p>This recent evidence is highly relevant and should weigh heavily against any suggestion that flooding here is only a limited or theoretical possibility. (Please see photographs 3-6).</p>	<p>climate change allowances. These design events are intended to represent future conditions over the lifetime of the Scheme.</p> <p>The assessment therefore captures the relevant flood mechanisms and does not assume that the catchment behaves as benign.</p>
GrPC-007	Hydrology and Flood Risk	Grendon Flooding	<p>Consultation relied on by the applicant appears to have taken place in early 2024, i.e. before the severe September 2024 floods. That timing matters. The Environment Agency presentation shows Northamptonshire experienced 148.6 mm of rainfall by the morning of 30 September 2024, around three times the average rainfall for the month, and states that this was wetter than the previous wettest September on record for Northamptonshire. In Easton Maudit, cars were swept off the road and into a brook! (please see photograph 7) The same presentation also notes the Environment Agency had seen the highest rainfall totals on record for 3, 6 and 12month periods across the Lincolnshire and Northamptonshire area. Any flood assessment that predates that</p>	<p>The Applicant notes the timing of consultation and the September 2024 rainfall event.</p> <p>The Flood Risk Assessment is based on the Environment Agency's current guidance, including climate change allowances derived from UKCP18, as set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007]. These allowances are specifically intended to account for increases in rainfall intensity and flood risk over the lifetime of the development.</p> <p>Individual extreme events, including September 2024, are consistent with the type of conditions that are represented within the design events used in the assessment. The assessment is therefore not dependent on a single historical event but is based on a</p>



			<p>event is plainly less reliable as an indicator of present-day risk.</p>	<p>forward-looking, policy-compliant approach.</p> <p>On that basis, the conclusions of the Flood Risk Assessment remain valid.</p>
GrPC-008	Hydrology and Flood Risk	Grendon Flooding	<p>Furthermore, the proposal to create hardstanding across the whole of BESS 2 is itself a flood risk issue. Replacing permeable agricultural land with extensive hardstanding will inevitably alter runoff characteristics and increase the speed and volume of water entering surrounding drainage routes and watercourses. That is especially concerning in an area where the applicant has already acknowledged fluvial flood risk, where mapped flood zones are severe, and where recent events show the catchment has experienced exceptional pressure. This gives rise to question closely, the applicants claim that the scheme 'will not improve the flood risk, but will not worsen flooding in the area'.</p>	<p>The Applicant notes the concern regarding the introduction of hardstanding and potential changes to runoff.</p> <p>As set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007], areas of impermeable infrastructure, including BESS, are limited in extent and are managed through a drainage strategy designed to control runoff rates and volumes.</p> <p>Runoff from developed areas is attenuated and controlled to greenfield runoff rates prior to discharge. This ensures that the Scheme does not increase the rate or volume of water entering surrounding drainage routes and watercourses.</p> <p>On that basis, the Scheme would not increase flood risk elsewhere and is consistent with the conclusions of the Flood Risk Assessment.</p>
GrPC-009	Hydrology and Flood Risk	Grendon Flooding	<p>The applicant's characterisation of the eastern part of BESS 1 area as only at "moderate risk" is interesting. Local experience is that the Eastern area of</p>	<p>The Applicant acknowledges the observations regarding flooding within the eastern part of BESS 1.</p>



			<p>BESS 1 floods badly and repeatedly, with flooding occurring at least annually, and photographic evidence exists to support that. (Please see photograph 8). It is also noted that the applicant is not planning on developing the Eastern area of BESS 1, presumably because the flood risk is recognised, as the Eastern end of BESS 1 is marked as flood zone 3 on Figure 7 section 2.1: EA's Flood Map for Planning (as is the site for BESS 2).</p>	<p>As set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007], areas identified as being at higher risk of flooding are avoided for built development. The layout of the Scheme reflects the findings of the site-specific flood risk assessment, with infrastructure located outside areas at risk during the design flood event.</p> <p>The classification of flood risk is based on modelled flood extents rather than solely on Flood Map for Planning designations or anecdotal observations. The approach to layout demonstrates that flood risk has been taken into account in the siting of development.</p>
GrPC-010	Hydrology and Flood Risk	Grendon Flooding	<p>Where the applicant's desk-based conclusions conflict with repeated observed flooding on the ground, greater weight should be given to real-world evidence, particularly when recent Environment Agency material confirms both exceptional rainfall and a clear history of flooding affecting Grendon.</p>	<p>The Applicant acknowledges the importance of observed flooding in understanding local conditions, including the photographs and records referenced by the Parish Council.</p> <p>The Flood Risk Assessment, as set out in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007], incorporates available historical information alongside site-specific modelling. Modelled outputs provide a consistent and policy-aligned basis for assessing flood risk across the Scheme and are used to determine</p>



				<p>development suitability and mitigation requirements.</p> <p>Observed flooding informs understanding of flood mechanisms; however, the photographs submitted show limited and localised flooding within the wider land parcel, which is consistent with the modelled outputs. The photos do not show the proposed BESS infrastructure areas to be flooded and do not conflict with the conclusions of the site-specific assessment. The modelled assessment of defined design events, including climate change, remains the basis for determining flood risk and development suitability.</p> <p>The conclusions of the assessment are therefore based on both sources of information.</p>
GrPC-011	Hydrology and Flood Risk	Grendon Flooding	<p>For all of those reasons, the revised Flood Risk Assessment should be treated with considerable caution. It does not appear to present a robust or credible assessment of flood risk for the proposed BESS areas, particularly BESS 2. As a minimum, GPC requests that the Examining Authority should require the applicant to revisit the assessment in light of the September 2024 flooding evidence, the mapped flood-zone constraints, the historic and</p>	<p>The Applicant notes the request to revisit the Flood Risk Assessment.</p> <p>The assessment presented in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007] and the supporting Flood Risk Assessment and Drainage Strategy suite has been undertaken in accordance with national policy and Environment Agency guidance, including the application of UKCP18 climate change allowances. The</p>



			<p>recent flood record for Grendon, and the runoff consequences of extensive hardstanding within this catchment. On the evidence presently available, the applicant has not demonstrated that the siting of BESS 2 particularly, is environmentally acceptable in its proposed situation, would be safe for its lifetime, nor that it would avoid increasing flood risk.</p>	<p>assessment has also been undertaken in consultation with the relevant statutory consultees (North Northamptonshire Council, West Northamptonshire Council, Milton Keynes City Council and the Environment Agency) with whom there are no outstanding matters to be agreed in respect of flood risk and drainage, as set out in the latest Statement of Common Grounds [EX7/GH8.3.1_C, EX7/GH8.3.2_C, EX7/GH8.3.3_C and EX7/GH8.3.5_D].</p> <p>The assessment demonstrates that development is located outside areas at risk during the design flood event, that runoff from impermeable areas is controlled to greenfield rates, and that the Scheme would not increase flood risk elsewhere.</p> <p>The matters raised regarding mapped flood zones, historical flooding and recent events are addressed within the assessment and do not alter its conclusions.</p> <p>On that basis, the Applicant considers that the Flood Risk Assessment provides an appropriate and reliable basis for assessing flood risk for the Scheme.</p>
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2.2 Linda Twohey

Table 2.2: [REP6-105](#) and [REP6-106](#)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
Linda Twohey Post-hearing submissions, including written summaries of oral submissions and any documents requested by the ExA - ISH5 [REP6-105]				
LT-001	Glint and Glare	General	I wish to expand further my comments made at ISH 5, on item 3.2, about the Applicant's assessment of glint and glare effects on residential properties, taking as an example, property R11 at New Lodge Barns, Walgrave. (See Fig 5.2, APP-155).	The Applicant notes this comment and refers to the responses below.
LT-002	Glint and Glare	Methodology and Assessment	In APP-155, Table 4.2 shows the 'Dwellings Impact Significance Guidance'. Moderate impact is defined as: 'Predicted glare of any intensity which occurs for longer than 60 minutes or for more than 3 months per year. Application of professional judgement does not significantly decrease the significance of the potential glare. Mitigation may be required at the planner's discretion'.	<p>The Applicant directs Linda Twohey to paragraph 15.4.27 of ES Chapter 15 Glint and Glare [APP-052]:</p> <p>Where glare is predicted to be experienced for less than one hour per day and less than three months per year at a dwelling observation point a 'Low' magnitude impact is designated and no mitigation is required. 'Low/Minor' impacts may also be determined upon application of professional judgement and consideration of additional factors that may reduce the magnitude of impact such as:</p> <ul style="list-style-type: none"> • Separation distance from panel area to dwelling observation point – the



				<p>proportion of an observer's field of view that is affected by glare reduces with increased separation distance.</p> <ul style="list-style-type: none">• The sun's position relative to the panel area – Effects that coincide with direct sunlight appear less prominent than those that do not as the sun is a far more significant source of light than reflecting panels. This factor is important at sunset and sunrise where the sun is lowest in the sky.• The extent to which cloud cover and glare impacts coincide – cloud cover varies across a year with overcast or mostly cloudy conditions ranging from 51-79% of the year across the UK. This is of particular significance for interpretation of annual glare duration results, derived from models which assume clear, sunny skies all year-round.• The location of the main living space within the dwelling – ground floor rooms are typically the most occupied part of residential dwelling during daylight hours and have a greater amenity significance than upper floors.• Dwelling windows facing the solar arrays – where there are no windows facing the
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				solar arrays, the impact magnitude reduces.
LT-003	Glint and Glare	Methodology and Assessment	<p>According to my calculations, using the Applicant's modelled data, if fixed panels are deployed, R11 will experience:</p> <p>Glare for >6 months per year, from both Sites A and A2, with 50 – 55 minutes of glare for at least 5 months, occurring both morning and early evening.</p> <p>If tracking panels are used: Glare for >6 months per year, minimum 30 minutes per day, from Site A and/or A2, 50 – 55 minutes glare for at least 5 months, occurring both morning and early evening.</p> <p>With both types of panels, this clearly falls into the Moderate impact category.</p>	<p>The Applicant notes interest in receptor R11 displayed on Figure 5.2 of ES Appendix 15.1 Green Hill A and Green Hill A.2 Ground-Based Receptor Results [APP-155].</p> <p>The Applicant directs Linda Twohey to Section 6.1.3 Results Discussion of ES Appendix 15.1 [APP-155]. Mitigating factors for the assessed receptors including R11 are discussed here.</p> <p>Following application of mitigating factors, the Applicant directs Linda Twohey to Section 6.1.4 Residual Impact. Upon review of mitigating factors, the residual impact of Low Impact (upon applying professional judgement) is determined and presented within this section.</p> <p>The Applicant respectfully disagrees, as the method used to reach these figures is unclear.</p>
LT-004	Glint and Glare	Methodology and Assessment	<p>Additionally, the Applicant has modelled all the residential glare results as at 1.8m above ground level, i.e. on ground floor only. This is stated to be 'Industry Guidance' but is evidently inappropriate for residential properties where it cannot be assumed that receptors in upper level</p>	<p>Where reflections are predicted from solar panels within 1km of a residential dwelling and consideration of relevant factors indicates that additional mitigation is required, screening in the form of vegetation or a fence has been recommended. The proposed mitigation sufficiently screens solar reflections towards at least the ground</p>



			<p>rooms are not subject to any adverse effects, particularly as the timing of glare with both types of panel will tend to be early morning and early evening. Also, many residential properties are now used as offices for working from home.</p>	<p>floor of the dwellings when reflections are predicted to be geometrically possible</p> <p>.Predicted total glare from the first floor of dwellings would not be significantly different to the ground floor.</p> <p>The maximum potential impacts have been determined following the methodology adopted within the ES.</p> <p>Where reflections from solar panels are predicted within 1 km of a residential dwelling, and consideration of relevant factors indicates that additional mitigation is required, screening in the form of vegetation or fencing has been recommended. The proposed mitigation is designed to sufficiently screen solar reflections towards the ground floor of affected dwellings where reflections are geometrically possible.</p> <p>This is in line with industry guidance which recommends glare modelling for ground floor residential receptors because it is typically the most occupied part of the dwelling during daylight hours. A height of 1.8 m above ground level will be considered to account for observer's eye level on ground floor (main habitable rooms are generally on the ground floor), unless otherwise stated.</p>
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<p>LT-005</p>	<p>Glint and Glare</p>	<p>Methodology and Assessment</p>	<p>In Results discussion, 6.1.3, (APP-155) a photograph has been taken from the Kettering Road opposite R11, Figure 6.4, directly into the existing hedgerow, which appears to have been chosen for it's particularly high vegetation, not representative along this stretch of road.</p>	<p>Figure 6.4 of [APP-155] has not been selected for the existing vegetation. It has been selected as there is a gap in the hedge which provides a viewpoint between R11 and PV2 Green Hill A.</p> <p>This is as per the Figure title "Intervening Topography between R11 and PV2 Green Hill A".</p>
<p>LT-006</p>	<p>Glint and Glare</p>	<p>Methodology and Assessment</p>	<p>It states 'Line of sight from PV3 Green Hill A towards R11 is expected to be obstructed by PV2 Green Hill A. Furthermore, line of sight between R10 and PV2 Green Hill A is obstructed by intervening topography'. I cannot find any diagram which explains which fields of Site A are in each of PV1, PV2 and PV3, so are unable to assess this myself. But surely the modelling has already taken topography into account in it's calculations of angles of glare? If not, how much confidence can be placed in these results, across all of the Glint and Glare assessments, on residential, road users and aviation?</p>	<p>The glare model takes account of the elevations of the solar panels and all receptors, but the intervening topology or planting does not form part of the model.</p> <p>Potential topographical obstructions to the line of sight between a receptor and a solar panel is considered outside the model for receptors where glare is theoretically possible based on panel and receptor height and angle alone.</p> <p>A figure showing the Modelled PV Panels can be found under Figure 2.3 of [APP-155].</p>
<p>LT-007</p>	<p>Glint and Glare</p>	<p>Methodology and Assessment</p>	<p>The Applicant then concludes that the line of sight from R11 towards the remaining panels of Site A and all of Site A2 will be obstructed 'by vegetation that is to form instant screening as part of embedded</p>	<p>The Applicant has prepared the embedded mitigation with consideration to topography. The Applicant considers that the proposed embedded mitigation [APP-208] is robust in providing instant screening to R11.</p>



			<p>mitigation for the Landscape and Visual Impact Assessment'. Reference to APP-208 shows that native tree and scrub planting, instant screening, is planned for the side of A2 opposite R11. However, the land is rising, so any effects are likely to be limited. Reference to APP-207, shows that no instant screening is planned at all for the east side of Site A which faces towards the properties including R11 at New Lodge Barns.</p>	<p>The part of Site A that is within 1km screening distance is blocked by topography between the proposed solar panels and the properties at New Lodge Barns including R11. Therefore, additional mitigation is not proposed.</p>
LT-008	Glint and Glare	Methodology and Assessment	<p>In 6.1.3.2, Cloud Cover, the Applicant uses the fact that there is likely to be between 43% and 65% cloud cover during the months March -September in this area, as further reason to downgrade the predicted effects on residential receptors. They state 'the modelled glare from the Scheme is likely to occur 43% less often than predicted as a minimum.' But this is not correct, as any experience of seeing ground-mounted solar PV panels shows that glare occurs in overcast as well as clear skies.</p>	<p>The model system output calculation is a Direct Normal Irradiance-based approximation that assumes clear, sunny skies all year-round.</p> <p>The potential for a solar panel to reflect light during overcast conditions is much reduced as the solar radiation received from the sun is much reduced.</p> <p>The application of cloud cover is considered an appropriate method to assess against real-world conditions.</p>
LT-009	Glint and Glare	Methodology and Assessment	<p>Section 6.1.4 then shows that glint and glare effect on R11 is considered to have been assessed as 'low impact (upon applying professional judgment)'. This 'professional judgment' is not qualified, we are not</p>	<p>Professional judgement has been applied to determine the residual impact significance at receptor R11. This includes:</p> <ul style="list-style-type: none"> • Additional screening/obstructions; and



			<p>provided with any basis to assess this, and should be disregarded as it is clearly open to bias from the developer's viewpoint.</p>	<ul style="list-style-type: none"> The extent to which cloud cover and glare impacts coincide. <p>The discussion and consideration of these points is outlined under Section 6.1.3 of [APP-208] with consideration towards the significance of effect.</p> <p>The Applicant has appointed experienced professional environmental consultants to carry out the Glint and Glare Assessment. The Applicant refers to the Statement of Competence [APP-065] for further information.</p>
LT-010	Glint and Glare	Methodology and Assessment	<p>In total, 19 residential properties in Walgrave have had the impact rating of the effect of glint and glare from panels classified as 'low, by applying professional judgment'. This appears to have been reached by limiting assessment of effects to the ground floor, overstating the existence of vegetation intervening in sight lines, and using cloud cover spuriously to downgrade impacts to low.</p>	<p>The Applicant has addressed comments relating to the height of receptors and the cloud cover in responses above.</p> <p>The Applicant has considered vegetation within the context of embedded mitigation proposed by the Applicant to reduce predicted impacts toward assessed receptors.</p>
LT-011	Glint and Glare	Methodology and Assessment	<p>This approach to assessments has been replicated for hundreds of residential properties across all the other areas affected by the other Sites planned for solar PV development. This turns what should be objective calculations into subjective 'guesstimates' whose validity is</p>	<p>The Applicant considers that the Glint and Glare Assessment is robust has been prepared in line with recognised industry guidance and methodologies applied to other consented solar developments in the UK.</p>



			therefore unreliable. I believe that this allowed a serious underestimate of the effects of glint and glare on residential receptors by the Applicant.	
LT-012	Glint and Glare	Methodology and Assessment	The potentially affected residents have not been informed directly by the Applicant of these effects, and are likely to be unaware of this. As I have observed elsewhere, with the volume of DCO documentation, it is difficult for a lay person to navigate and find the finer detail, even with considerable perseverance. Therefore I contend that they have not been given the opportunity to present their views, with personal circumstances, on the range of adverse impacts of glare they would anticipate experiencing in the event of this development proceeding. I believe that these views are essential to guide decision-making surrounding this aspect of the proposed Green Hill Solar industrial complex.	<p>ES Chapter 15 Glint and Glare [APP-052] and accompanying appendices [APP-155 to APP-165] presents the Applicant's full assessment and finding in relation to glint and glare.</p> <p>The Applicant appreciates that there is a large volume of documents which form part of the DCO but the documents relating to glint and glare have not been changed since the application submission. All parties are able to register as interested parties at the start of the DCO examination and remain involved and make representations throughout the whole process. The Applicant therefore politely disagrees that the local community have not had sufficient opportunity to engage in the process.</p>
<p>Linda Twohey</p> <p>Post-hearing submissions, including written summaries of oral submissions and any documents requested by the ExA - OFH2 [REP6-106]</p>				
LT-013	Scale and location	Alternative locations	I am a resident of Walgrave and a member of STOP Green Hill Solar. Thank you for the opportunity to speak directly to you again.	The Applicant notes this comment and refers to their responses to LT-001 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3



			<p>In my OFH address in December, (see REP3 -114), I concentrated on the within-site layout of Site A, and how better choices by the Applicant could significantly reduce the harm and impact of the development in a variety of ways, including that on wildlife and the local community.</p> <p>Subsequently I and other Walgrave residents are very grateful that the Examiners have determined not to accept solar array development within the triangular field AF 29, and so the Applicant has included this in Change Request 2 (see latest plan CR2-008 for field numbering, and revised detailed site layout).</p> <p>Subsequent to this change, I plan to address why development should now also be removed from field AF9, and the interrelated issue of construction access to fields AF2,3 and 4.</p>	<p>and the Applicant's Responses [REP6-070].</p>
LT-014	Scale and location	Alternative locations	<p>Now that the designated Quiet Lane, Newland Road, will be less directly impacted by the proximity of 4.5 metre solar panels, I wish to question any necessity to place solar arrays in field AF9.</p> <p>By my calculations, the area of panels planned for this small field is only about 2% of the total within Site A.</p>	<p>The Applicant notes this comment and refers to their responses to LT-001 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070].</p> <p>The design of the panel and fencing layout in AF9 takes account of all ecological constraints identified, with appropriate</p>



			<p>The use of this field is complicated by the fact that there is a utility, presumably a water main, running diagonally underneath it (CR2-008) which needs to remain accessible. It is also next to a watercourse which is otherwise being preserved from disturbance because of good suitability as a probable commuting and foraging route for otters from Pitsford reservoir, and good suitability for water voles, amongst other ecological reasons. (See APP-090, para 1.4.10, and it's Appendices maps 9.7.1 and 9.7.8). Reference again to CR2-008 shows that the other fields bordering this watercourse, AF5, AF6, AF7 and AF12 have been designated either for enhanced existing vegetation or for damp grassland.</p>	<p>protective ecological buffers implemented to avoid impacts on these features. Details of the ecological buffers implemented are provided in the Outline Ecological Protection and Mitigation Strategy (Revision E) [EX7/GH7.5_E].</p>
LT-015	Traffic and Access	Construction Access	<p>I wish to address the confusion that appears to me to surround the access route for construction of solar arrays within the fields AF2, 3 and 4 on the west side of Site A, as this is integral to my argument in favour of removing AF9 from solar array usage. In the Applicant's original documents submitted for examination, APP-444, Figure 13.13 shows access locations for Sites and Cable route corridors for Site A. This clearly shows Access A-2</p>	<p>Please refer to the response to 'LT-001' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] which confirms that construction access to Green Hill A will be via Access A-1 off Broughton Road. Fields AF2 to AF4 will be accessed via internal tracks from Access A-1 (West), and an existing bridge over the stream will be utilised to connect Field AF9.</p> <p>Please note that the access tracks shown on the Illustrative Layout Plans [APP-193 to</p>



		<p>which is just northeast of the village of Old, on the Broughton Road.</p> <p>However, in REP3-064, the Outline Construction Traffic Management Plan Revision B, in Table 4.1, this Access A-2 on the Broughton Road is only listed for use during the operational phase, not construction.</p> <p>On the latest revision of the Site A map, (CR2-008) it is clear that a length of the Broughton Road by Old is within the scheme order limits, but confusingly, the access track marked within fields AF1, 2, 3 and 4 does not appear to connect to the road here. However, it also does not connect eastwards across the watercourse to Newland Road (the Quiet Lane), so my question is, how are construction vehicles expected to access fields AF2, 3 and 4 for the erection of solar arrays and the associated works planned?</p> <p>In my previous OFH submission (REP3-114), I questioned why construction access to the west side of Site A was not designated to be from the Broughton Road by Old, to minimise any need to cross Newland Road. Disappointingly, the Applicant's response to my submission (pages 33-</p>	<p>APP-206 and REP1-107 to REP1-110] and Landscape and Ecology 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] are indicative; a network of access tracks will be progressively developed across the Sites to enable access to all internal areas from the site entrance. These will be confirmed at the detailed design stage and implemented in accordance with the Outline Construction Environmental Management Plan [EX7/GH7.1_D], as well as the environmental buffers set out in the Concept Design Parameters and Principles [REP6-039] and the Ecological Protection and Mitigation Strategy [EX7/GH7.5_E].</p>
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			39 of REP3-129) did not answer this point at all.	
LT-016	Traffic and Access	Construction Access	<p>If the Applicant had intended that construction in fields AF2 – 4 would be accessed by crossing Newland Road at Crossing points A-1 (E) to A-1 (W) (REP1-157), then it would be necessary to construct an access route across the ecologically valuable watercourse already mentioned. However, the Applicant states in APP-046, Ecology and Biodiversity, under Embedded Construction Mitigation Measures, para 9.8.4 that buffers from ecological features are applied according to a set of ecological importance criteria, that buffers shall be 15 metres minimum from all hedgerows, minor watercourses (small stream) etc., that buffers will not contain any array structures, hard standing or electrical hardware, and that protective construction-phase fencing will also observe these buffer distances. Para 9.8.6 states that 'Internal access/maintenance tracks have also been routed so as to avoid designated ecological buffer zones wherever possible.'</p> <p>I have looked through the plans for all the other Sites and can find no example of a construction access</p>	<p>Please refer to the response to 'LT-001' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] and LT-003 above which confirms that fields AF2 to AF4 will be accessed via internal tracks from Access A-1 (West), and an existing bridge over the stream will be utilised to connect Field AF9.</p> <p>The Applicant would note that a revised version of Environmental Statement Chapter 9 Ecology and Biodiversity (Revision B) [REP6-013] was submitted at Deadline 6, which clarifies that the ecological buffers were used to inform the Scheme's overall design from an early stage, but do not account for specific works which will necessarily entail incursion into the buffer zones at discrete locations (for example, to create field accesses through hedgerows). The buffer zones will be finalised following detailed design post-consent and detailed in the finalised Ecological Protection and Mitigation Strategy.</p>



			<p>track crossing an ecologically important watercourse. (See APP 211 – 219 inclusive). Therefore, I believe it is essential for the Applicant to address this issue before the end of the Examination process, that is, they must state clearly in amended documentation and mapping what route they do intend to use to construct solar arrays in fields AF2 – 4.</p>	
LT-017	Scale and location	Alternative locations	<p>It follows then, that if access for construction for fields AF2 – 4 has to be from Access point A-2, the Broughton Road by Old, (as I believe it has to be), then if the very small area of solar arrays in field AF9 were removed from development within the scheme, there would be no need for Crossing points A-1 east and west on the Newland Road at all. So, then no permanent access track would be required through the northern end of field AF29 (which has already been removed from solar array use). This field would then benefit from being able to support arable farming in the entire field. Ecological benefits include no longer needing to remove 2 portions of important hedgerow, one between fields AF29 and AF14, and the other between AF29 and Newland</p>	<p>As outlined in the Applicants response to 'LT-001' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] and 'LT-003' above construction access to Green Hill A will be via Access A-1 off Broughton Road.</p> <p>Access A-2 will only be utilised during the operational phase for maintenance vehicles as outlined in Transport and Access Routes Supporting Document [REP1-167].</p>



			<p>Road for Access A-1 (E) and skylark territories in that field would not have to be disturbed.</p> <p>Other benefits would include continued food production in AF9 whose soil is all in Agricultural Land Classification 2 (See APP 172).</p> <p>But most importantly to the local community, the only required disturbance then to Newland Road, the designated Quiet Lane so important for recreation for villagers (as demonstrated in my previous OFH submission and elsewhere), would be the need for the cable route from fields AF2 – 4 to cross to the east side of the Site. But otherwise, there would be no need for any closure or other regular disruption of the use of this road during the construction or maintenance phases. It would help to preserve some measure of tranquillity for users of this resource, and be of great benefit in limiting the very harmful disturbance during construction of the proposed scheme, both to humans and all other wildlife.</p>	
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2.3 Stuart Andrew MP

Table 2.3: [REP6-108](#)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SAMP-001	Agriculture and Soils	Loss of High Quality Agricultural Land	<p>A major concern is the proposed development's use of Best and Most Versatile (BMV) agricultural land, defined as land within Grades 1, 2 and 3a of the Agricultural Land Classification system.</p> <p>The National Planning Policy Framework states that where significant development of agricultural land is necessary, areas of poorer quality land should be preferred to those of higher quality. Similarly, the National Policy Statement for Renewable Energy Infrastructure (EN-3) advises developers to consider the quality of agricultural land when selecting sites for solar development.</p> <p>Available information indicates that a substantial proportion of the Green Hill site area lies within BMV classifications. The proposed development, therefore, risks the long-term loss of productive farmland across a large rural area.</p>	<p>Please refer to the Applicants response to 'SA-001' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070]</p>



SAMP-002	Agriculture and Soils	Loss of High Quality Agricultural Land	<p>This raises wider concerns in relation to:</p> <ul style="list-style-type: none">• National food security, particularly given increasing pressures on agricultural productivity caused by climate change and global supply instability;• The irreversible change to soil quality and structure resulting from construction, cable installation, and any decommissioning.• The potential loss of land capable of supporting diverse agricultural production.	<p>Please refer to the Applicants response to 'SA-001' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070].</p> <p>The 1200ha land for the proposed Sites only represents 0.01% of 16.8 million hectares of the utilised agricultural area and 0.027% of 4.4 million hectares arable land in the UK therefore it is not considered to have a significant impact on national food production and security. UK Food Security Report 2024 indicates that the 6.0 million hectares of the croppable area (consists of cereals, oilseed, potatoes, other arable crops, horticultural crops, uncropped arable land, and temporary grass) in 2023 in the UK remained broadly unchanged between 2020 and 2023, increasing by 1%.</p> <p>The disturbance of the land and soils during construction is temporary and minimal and the construction activities will be in compliance with the soil mitigation measures in the final soil management plan to protect soil resources and land during construction. Once the construction is complete, the soils and land of the disturbed areas will be restored to its previous</p>
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				<p>conditions, and the farmland will be under grassland with potential grazing. The conversion of arable land to grassland would be a long-term fallow and will remove disturbance on the soils and will result in an increase in soil organic carbon, better soil structure, increased infiltration, enhanced soil microbial populations and better land quality in long term as stated in Chapter 20: Agricultural Circumstances [APP-057].</p> <p>The land will be returned to agricultural use after the Scheme life cycle. The 1200ha land for the proposed Sites can serve as a strategic land reserve underpinning national food security.</p>
SAMP-003	Agriculture and Soils	Loss of High Quality Agricultural Land	<p>Although solar development is sometimes described as a temporary land use, the proposed 60-year operational period represents multiple agricultural generations, during which time the land would effectively be removed from full productive use.</p> <p>Given these factors, the proposal doesn't align with national policy objectives aimed at safeguarding high-quality agricultural land for future food production.</p>	<p>Please refer to the Applicants response to 'SA-006' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070]</p>



SAMP-004	General	Inappropriate Scale and Location	<p>The development covers approximately 1,200 hectares, making it one of the largest solar projects proposed in the UK. The scale of the development is comparable to the footprint of Heathrow Airport, highlighting the magnitude of the proposed scheme.</p> <p>The dispersed nature of the scheme, spread across multiple solar sites surrounding numerous villages, risks creating the perception that communities are encircled by industrial energy infrastructure.</p> <p>The proposal, therefore, raises significant concerns regarding compliance with the design principles contained in the National Policy Statement for Energy (EN-1), which requires infrastructure projects to minimise environmental impacts through appropriate site selection, layout and scale.</p>	Please refer to the Applicants response to 'SA-002' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] and the above response to 'SAMP-002'.
SAMP-005	General	Inappropriate Scale and Location	<p>In particular:</p> <ul style="list-style-type: none">the scale of the development appears disproportionate to the rural landscape in which it sits;	Please refer to the Applicants response to 'SA-003' of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] .



			<ul style="list-style-type: none"> the distribution of sites risks creating coalescence between settlements, reducing the visual and spatial separation between villages; The landscape character of the Northamptonshire countryside, defined by open farmland and historic settlement patterns, would be fundamentally altered. 	
SAMP-006	General	Inappropriate Scale and Location	<p>There is also concern that the location has been driven primarily by proximity to the grid connection at Grendon Substation, rather than by a comprehensive assessment of environmental constraints and landscape capacity.</p> <p>While national policy recognises the importance of renewable energy infrastructure, it also requires that developments be sensitively located and proportionate to their surroundings, which this proposal does not appear to achieve.</p>	<p>There is no prescribed methodology in national planning policy or guidance for site selection in relation to solar developments.</p> <p>NPS EN-3 Paragraph 2.3.9 recognises that <i>“most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN 1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments)”</i>. As outlined in the Applicants response to SGHS 001 to SGHS-006 in the Applicants Response to Stop Green Hill Solar</p>



				<p>[REP4-021] the provision of a grid connection offer is fundamental when considering the viability of the scheme as the provision of a grid connection is dependent on the ability to export the electricity generated. As the grid connection offer specifies Grendon Substation as the Point of Connection, the Applicant proceeded to look at sites that could accommodate a solar project in proximity to this location.</p>
SAMP-007	Alternatives and Design Evolution	Alternative Sites	<p>Many residents support the expansion of renewable energy but believe that alternative locations should be prioritised before developing productive agricultural land.</p> <p>National planning policy encourages the efficient use of previously developed land and existing built infrastructure. There is strong public support for expanding solar deployment on:</p> <ul style="list-style-type: none"> • warehouse and industrial rooftops • supermarket car parks • brownfield land • motorway verges and transport corridors 	<p>The Applicant supports the continued development of rooftop solar however as additional, rather than alternative, to large scale schemes. This is consistent with government's view, and for the reasons given, in NPS EN-1 (2023) Para 3.3.12.</p> <p>Government's UK Solar Roadmap, (June 2025) sets out how, alongside ground mount projects, the government plans to drive forward deployment of solar across multifunctional uses of space including rooftops. Large-scale and smaller-scale schemes, together, are needed to meet government's energy targets. Section 3.9 of the Applicant's Statement of Need [APP-556] summarises the government's Clean Power 2030 Action Plan which includes ambitious capacity ranges for large scale solar of 45 to 47 GW by</p>



			<ul style="list-style-type: none">• new housing and commercial developments <p>While it is recognised that not all buildings have suitable orientation, structural capacity, or grid connectivity, the rapid growth of large logistics and warehouse developments across Northamptonshire presents significant opportunities for rooftop solar generation.</p>	<p>2030 and 45 to 69 GW by 2035. Delivering these ranges, which is critical to the achievement of a clean power system on the way to net zero 2050, does not include rooftop schemes, therefore both large-scale and small-scale schemes are needed. Section 7.3 and Figure 15 of the Statement of Need [APP-556] show that not only do large-scale schemes contribute to the national need for power to be transmitted to wherever it is needed (therefore supporting electricity system security), but also large-scale schemes are more affordable than small scale schemes.</p>
SAMP-008	Alternatives and Design Evolution	Alternative Sites	<p>The application documents appear to provide limited evidence of a detailed sequential site assessment, demonstrating that brownfield sites, rooftop installations, or lower-grade agricultural land were thoroughly evaluated before selecting large areas of BMV farmland.</p> <p>Without a transparent comparison of these alternatives, it is difficult to conclude that the current proposal represents the most sustainable or policy-compliant location for solar development.</p>	<p>Please refer to the responses to SA-001 and SA-002 of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] and SAMP-006 and SAMP-007 above in regard to the site selection approach.</p>



<p>SAMP-009</p>	<p>Landscape and Visual Impact Cultural Heritage</p>	<p>Visual and Heritage Impacts</p>	<p>The proposed development raises concerns regarding landscape character, heritage assets, biodiversity, and environmental risk.</p> <p>From elevated viewpoints, particularly around Walgrave and nearby ridge lines, solar clusters at Sites A and A2 may be highly visible, creating a substantial change to the visual character of the countryside.</p> <p>The project also lies within a historic landscape containing:</p> <ul style="list-style-type: none"> • listed buildings • conservation areas • historic field patterns • archaeological remains <p>The National Planning Policy Framework requires decision-makers to conserve and enhance the historic environment, ensuring that developments do not cause unacceptable harm to heritage assets or their settings.</p> <p>Specific concerns have also been raised regarding:</p>	<p>Please refer to response to SA-003 of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] in regard to landscape character and visual amenity impacts.</p> <p>ES Chapter 12: Cultural Heritage [CR2-022], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed the potential impact of the scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Chapter 12: Cultural Heritage [CR2-022] for embedded mitigation and Section 12.11 for additional mitigation).</p> <p>No direct impacts have been identified to designated heritage assets. Identified impacts would be indirect and related to elements of their setting that contribute to their significance.</p> <p>ES Chapter 12 Cultural Heritage [CR2-022], has also assessed the potential impact of the scheme on identified archaeological assets. Where required appropriate mitigation is proposed. See Section 12.7 of ES Chapter 12 Cultural Heritage [CR2-022] for embedded mitigation and</p>
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			<ul style="list-style-type: none"> • a World War II aircraft crash site near Mears Ashby, which may fall under the protections of the Protection of Military Remains Act 1986; • the possibility that the site may contain ordnance or human remains, warranting careful archaeological investigation and preservation. 	<p>Section 12.9 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Appendix 12.6 Archaeological Mitigation Strategy [CR2-006] and secured by Requirement 12 in Schedule 2 to the Draft DCO [EX7/GH3.1_F].</p> <p>The assessment of heritage and archaeological impacts has been agreed with the Host Authorities and Historic England [EX7/GH8.3.1_C, EX7/GH8.3.2_C, EX7/GH8.3.3_C, REP6-075].</p> <p>Please refer to the responses to SA-004 and SA-002 of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] in regard to WWII crash sites.</p>
SAMP-010	Ecology and Biodiversity	Ecological Impacts	<p>Environmental impacts are also associated with:</p> <ul style="list-style-type: none"> • hedgerow removal and vegetation clearance during construction • potential disturbance to wildlife habitats • long-term fragmentation of ecological corridors. 	<p>An assessment of impacts on Hedgerows is provided on pages 149-151 of the Environmental Statement Chapter 9 Ecology and Biodiversity (Revision B) [REP6-013]. Given that hedgerow losses are anticipated to be minimal, and measures have been detailed in the Outline Ecological Protection and Mitigation Strategy (Revision E) [EX7/GH7.5_E] to minimise any damage or degradation</p>



				<p>to hedgerows during the construction phase, no residual effects are anticipated.</p> <p>The Scheme has also committed to delivering a minimum 47% biodiversity net gain in habitat units, and a minimum 10% net gain in both hedgerow and watercourse units, as per Requirement 9 of the Draft Development Consent Order (Revision F) [EX7/GH3.1_F].</p> <p>Disturbance and fragmentation impacts have been assessed across all of the ecological impact assessments in Section 9 of the Environmental Statement Chapter 9 Ecology and Biodiversity (Revision B) [REP6-013], where considered relevant.</p>
SAMP-011	Hydrology and Flood Risk	Battery Risk	In addition, the proposed Battery Energy Storage System (BESS) near Grendon is located in an area identified as a Flood Zone, which raises questions about environmental risk and emergency response planning.	The Applicant acknowledges previous representations regarding recent flood alerts associated with the River Nene and surrounding infrastructure, including crossings at Whitemills Marina and Hardwater. Flood alerts issued by the Environment Agency indicate the potential for flooding within defined river catchments during periods of elevated river levels. These alerts reflect wider catchment conditions and do not in themselves indicate that development land is located within



				<p>areas of functional floodplain or that it is unsuitable for development. Flood risk associated with the Scheme, including the Green Hill BESS site at Grendon, has been assessed in ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007] and the Flood Risk Assessment and Drainage Strategy [REP5-021], with site-specific assessment provided in Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS [REP5-031]. These assessments utilise Environment Agency Flood Map for Planning data, detailed topographic survey information and hydraulic modelling where required.</p> <p>This assessment demonstrates that the developable areas of BESS infrastructure are located outside the modelled 1% annual probability flood extent including climate change.</p> <p>Please also refer to responses to GrPC-003 to GrPC-012 above in regard to flood modelling and approach to siting of the BESS.</p>
SAMP-012	General	Environmental Impacts	Taken together, these issues suggest the proposal could lead to significant environmental and	The assessments set out within the Environmental Statement [APP-038 to APP-064] have been undertaken to identify the likely effects of the Scheme



			heritage impacts that have not yet been fully resolved.	during its construction, operation, and decommissioning phases. Where significant effects have been determined to be likely, the Scheme includes mitigation measures to reduce adverse effects and disruption. The measures are secured through the relevant mitigation and management plans secured by Requirements in Schedule 2 to the Draft DCO Revision F [EX7/GH3.1_F] .
SAMP-013	General	Project Lifespan and Decommissioning	<p>The proposal states an operational lifespan of approximately 60 years, which is significantly longer than the lifespan typically associated with solar panel technology.</p> <p>Solar panels commonly have an effective lifespan of 25–35 years, meaning that significant replacement or refurbishment could be required during the project's lifetime.</p> <p>This raises questions regarding:</p> <ul style="list-style-type: none"> • the long-term environmental impact of panel replacement and disposal • the potential increase in waste materials and resource consumption 	<p>Please refer to the Applicant's response to SA-006 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070].</p> <p>As outlined in ES Chapter 2: EIA Process and Methodology [APP-039] (paragraph 2.6.14), the Environmental Impact Assessment considers potential impacts associated with the operational replacement phase.</p> <p>ES Chapter 24: Other Environmental Matters [REP1-027] addresses waste arising from the replacement of infrastructure, with Table 3.17 of the Outline Operational Environmental Management Plan [REP6-043] setting out measures for the appropriate management of waste.</p>



			<ul style="list-style-type: none">whether the project's overall lifecycle emissions remain consistent with its stated environmental objectives. <p>There is also concern that if the project were to become economically unviable in the future, it could be abandoned without full restoration of the land.</p> <p>For this reason, many residents believe that a financial decommissioning bond should be required from the developer, currently owned by Macquarie Group, to ensure that funds are available to restore the land to agricultural use once the project ends.</p> <p>Without such safeguards, there is concern that the land could become permanently degraded, eventually being reclassified as brownfield land and potentially redeveloped for housing.</p>	ES Chapter 7: Climate Change [APP-044] also considers the replacement of components during the operational phase, including the associated waste arisings and the operational greenhouse gas emissions effects.
SAMP-014	Transport and Access	Construction Traffic	The construction phase of the project is expected to involve large volumes of heavy goods vehicle (HGV) traffic, transporting solar panels, mounting structures,	An assessment of construction traffic and the associated effects is provided in ES Chapter 13 Transport and Access [REP2-003] .



		<p>cables, and other equipment to multiple dispersed sites.</p> <p>Many of the surrounding roads are narrow rural lanes designed primarily for agricultural vehicles, rather than sustained HGV traffic.</p> <p>Potential impacts include:</p> <ul style="list-style-type: none">• increased road safety risks for pedestrians, cyclists, and horse riders• noise pollution affecting nearby residents• damage to local road infrastructure not designed for heavy construction traffic• disruption to daily life in nearby villages. <p>With construction anticipated to take years, rather than months, the cumulative impact of construction traffic across multiple sites may therefore place significant strain on the local highway network and rural communities.</p>	<p>ES Chapter 14 Noise and Vibration [APP-051 and REP1-168] contains an assessment of noise and vibration impacts from construction and operational traffic and finds no significant adverse effects on surrounding receptors.</p> <p>The Outline Construction Traffic Management Plan Revision C [REP6-055] (OCTMP) provides a framework for the management of construction vehicle movements to and from the Scheme. It will ensure that the effects of the construction phase are minimised. The OCTMP sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. The detailed CTMP, to be approved by the relevant planning authority, is secured in Schedule 2, Requirement 15 of the Draft DCO Revision F [EX7/GH3.1_F].</p> <p>The OCTMP [REP6-055] also includes road condition surveys under Section 5.3. Road condition surveys will be carried out on minor roads proposed for construction access to remedy</p>
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				damage caused by construction traffic associated with the Scheme.
SAMP-015	Community Benefit Socio-economics, Tourism and Recreation	Disruption to Local Access and Recreation	<p>The countryside surrounding the proposed development is widely used for walking, cycling, and horse riding, forming an important part of the area's recreational and cultural identity. Several well-used routes are located within or adjacent to the proposed sites.</p> <ul style="list-style-type: none"> • Construction activities, increased traffic, and the presence of extensive solar infrastructure risk: • reducing the amenity value of these routes • disrupting established recreational patterns • altering the rural experience that residents and visitors currently enjoy <p>Although permissive paths are sometimes offered as mitigation, these do not carry the same legal protections as formal rights of way and can be withdrawn in the future. Many residents, therefore, feel that the social and community value of</p>	<p>The Applicant has assessed the likely impacts of the Scheme on PROWs and recreational access routes (including recreational use of the local highway network) in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and its supporting Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]. This assessment has considered any impact to user safety, likelihood of interaction with HGV movements during construction, and the experiential change to users during the Scheme's operational lifetime. The assessment finds residual significant effects to regionally and nationally important long-distance recreation routes during construction (and as such will have to be considered in the planning balance when the DCO is determined), but finds no long-term significant effects during the Scheme's operation, nor any residual significant effects to any individual PROW at any phase of the Scheme.</p> <p>Furthermore, the assessment in ES Chapter 18: Human Health [APP-055] considers the Scheme's impact on access to open space and the</p>



			<p>these landscapes has not been adequately considered.</p>	<p>countryside (heading: 'open space, leisure, and play'), and on community sense of place and value of the landscape (heading 'community identity, culture, resilience and influence'). The assessment finds no significant adverse effects to access to the countryside or community identity and culture in respect of its rurality and sense of place.</p> <p>The Applicant understands permissive access routes do not have the same legal weight as PROWs, and are not proposed to be retained following decommissioning (subject to landowner discretion). That notwithstanding, the Applicant is committed to ensuring permissive paths are maintained throughout the up to 60-year operational lifetime of the Scheme, as secured by the OPROWPPMP [REP6-033] by Requirement 18 of Schedule 2 to the final Draft DCO [EX7/GH3.1_F].</p> <p>The Applicant is confident that the assessments in ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054] and ES Chapter 18: Human Health [APP-055] together adequately consider the recreational, social and community impacts of the Scheme.</p>
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SAMP-016	General	Scale, Location and Land Use	<p>Concluding Comments While there is broad recognition of the importance of renewable energy and the role solar power can play in supporting the UK's transition to a low-carbon energy system, the location, scale, and land use implications of this particular proposal raise significant concerns for many local communities.</p> <p>In particular, the loss of Best and Most Versatile farmland and the industrial scale of the development across a rural landscape suggest that the project, as currently proposed, may not represent the most appropriate or sustainable approach to delivering renewable energy infrastructure.</p>	Please refer to the Applicant's responses to 'SA-001' to 'SA-015' above.
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2.4 Sarah Bool MP

Table 2.4: [REP6-107](#)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SBMP-001	General	National Policy Statement	<p>I think there is a slight irony here - a scheme that is designed to bring in vast quantities of power to an area, simultaneously taking away the decision making power from locals in being an NSIP.</p> <p>Given that backdrop, it becomes very important that the terms that the Secretary of State operate in are understood. Under s104 of the Planning Act 2008, the Secretary of State must decide the application in accordance with the National Policy Statement that has effect – here namely EN-1 and EN-3. These set out the policy tests for siting, design, mitigation, cumulative effects, land use and the acceptability of impacts in particular places. Critically, under s104 paragraph 7 of the Planning Act, the Secretary of State may decide that the adverse impact of the proposed development would outweigh its benefits. So the question for this examination is not whether solar is needed. National policy makes that clear. The</p>	<p>Please refer to the Applicant's response to SB-001 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070].</p>



			<p>question is whether *this* particular scheme, meets the expectations in the National Policy Statements and whether the adverse impact of the proposed development would outweigh its benefits.</p> <p>I am going to speak to what this means on the ground for the communities in South Northamptonshire that I represent.</p> <p>I will address six issues and I will show how each of these either contradict the National Policy Statements or contribute to the overall picture that the adverse impacts are severe and outweigh the benefits of this proposal.</p>	
SBMP-002	General	Size and context of the site	<p><u>The scheme's fragmentation and the "spread" of harm</u></p> <p>This scheme is not just large. It is unusually fragmented. As you are well aware, it comprises nine separate sites linked by around 31km of cabling - a proposal the size of Heathrow Airport but spread over 16 miles. That is not a neutral design feature. EN-1 section 4.3.15 is explicit that applicants must include information about reasonable alternatives they have studied including the main reasons</p>	<p>Please refer to the Applicant's response to SB-002 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070].</p>



			<p>for the choice, taking account of environmental, social and economic effects.</p> <p>So I want to put a simple question on the record:</p> <p><i>Is the evidence supplied to date by the applicant sufficient to</i></p> <ol style="list-style-type: none"><i>1. justify that this level of fragmentation is unavoidable, rather than simply convenient for land assembly and</i><i>2. Ensure that it does not drive a materially wider and more severe spread of harm than a more condensed layout would have done? This application's structure makes it easy for harm to be assessed piecemeal. BUT the National Policy Statements (EN-1 s4.3.19) tells you not to do that and to take this into in the round.</i> <p>Furthermore, EN-1 4.7.2 requires a proposal to be "efficient in the use of natural resources, including land-use". How is it reasonable for a scheme that is so inefficiently spread over such a large area to claim to be efficient in its use of land?</p>	
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<p>SBMP-003</p>	<p>Landscape and Visual</p>	<p>Impacts to Easton Maudit</p>	<p><u>Landscape, visual amenity and the encirclement of Easton Maudit</u></p> <p>Under this proposal, over 750 acres around Easton Maudit, Bozeat and Grendon would be taken up by solar panels and battery storage infrastructure under Sites F and the BESS.</p> <p>Easton Maudit would be surrounded by panels on three sides, leaving only one remaining open approach.</p> <p>This goes far beyond the standard expectation of “views of infrastructure” - it is a case of spatial enclosure of a historic village.</p> <p>EN-1 requires an applicant to submit a Landscape and Visual Impact Assessment which the applicant has done – but I question its analysis.</p> <p>For example, outlining the impact of Site F,</p> <ul style="list-style-type: none"> It proudly states that there are no Listed Buildings on the site – of course not, it is an agricultural field, but there are 4 Grade 1 listed and 91 Grade 2 listed buildings nearby. 	<p>Potential impacts to the setting of Heritage Assets (including Listed Buildings) are included within Environmental Statement Chapter 12 Cultural Heritage [APP-049]. The LVIA [APP-045] includes reference to Heritage Assets within the Study Area to help inform the assessment of Landscape Sensitivity.</p> <p>Potential impacts to SSSI's are included within Environmental Statement Chapter 9 Ecology and Biodiversity [REP6-013]. The LVIA [APP-045] includes reference to SSSIs (and other Ecological Designations) within the Study Area to help inform the assessment of Landscape Sensitivity.</p> <p>With regard to specific landscape and visual impacts associated with Easton Maudit, the LVIA [APP-045] identifies a significant adverse effect to the character of the landscape within 1km of the Sites, including that surrounding Easton Maudit during construction and operation Year 1. This relates to the change in landscape character</p>
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			<ul style="list-style-type: none">• Even with the SSSI, “there are no SSSIs on the site” but there is one “located approximately 70m east of the eastern Site boundary”. If I were Usain Bolt, with his 100m record I could easily reach that SSSI in less than 9.58 seconds. <p>To return to my initial point - with this design as it stands, can you realistically avoid the outcome that Easton Maudit becomes functionally and visually enclosed by energy infrastructure for decades. The answer is – NO.</p>	<p>from the addition of solar infrastructure, before the mitigation planting has become established. The effect is reduced to not significant from Year 15 of operation.</p> <p>Specifically in regard to Site F, the proposed mitigation planting includes for substantial areas of new woodland, hedgerow and meadow planting, which once established would provide positive contributions to the countryside surrounding Easton Maudit. However, given the scale of the proposals, there would be an appreciation of the Scheme within its immediate surroundings which would be notably different from the character of the surrounding arable countryside helping mitigate adverse effects to no longer being Significant, however adverse effects would prevail for the lifetime of the Scheme.</p> <p>The Scheme design has been established to reduce impacts to the Grendon and Easton Maudit Conservation Areas. Attention has also been made to the kinetic</p>
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				<p>experience to heritage assets as you move through the landscape, especially the visual corridors between heritage assets at the core of the villages (i.e. Churches). As such, the visual corridor is retained between Churches in Grendon, Easton Maudit and Bozeat, in particular, along PROW with historical associations / views between heritage assets. Solar panels have either been removed (i.e. Fields FF9, FF13, FF14, FF16 and FF22) or offset (Fields FF11, FF15, FF19 and FF26) away from Conversation Areas, and enhanced screening of existing hedgerow and tree belts has been also been proposed to minimise impacts to elements of the rural setting that contribute to the character of the Conservation Areas.</p> <p>ES Chapter 12: Cultural Heritage [APP-049], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has identified a moderate adverse effect would occur as a result of the Scheme to the Mears Ashby</p>
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				<p>and Easton Maudit Conservation Areas, and the Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784).</p> <p>The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the lowest achievable levels resulting in Easton Maudit not becoming functionally or visually enclosed by the Scheme.</p>
SBMP-004	Cultural Heritage	Impacts to Easton Maudit	<p>Now heritage.</p> <p>Easton Maudit as noted contains a Grade I listed church and multiple Grade II listed buildings, with the development altering the setting for the full operational period.</p> <p>EN-1 Sections 5.9.28 and 29 require the Secretary of State to give great weight to a heritage asset's conservation and any harm to its significance should require clear and convincing justification.</p>	<p>ES Chapter 12: Cultural Heritage [CR2-022], supported by ES Appendix 12.1: Heritage Statement [APP-110 to APP-120], has assessed the potential impact of the scheme on built heritage assets including designated assets within Easton Maudit, and where required appropriate mitigation has been proposed (see Section 12.9 of ES Chapter 12: Cultural Heritage [CR2-022] for embedded mitigation and Section 12.11 for additional mitigation). A moderate</p>



			<p>Has this test been met if Easton Maudit and its listed buildings are surrounded for a minimum of 60 years? It does not appear so.</p>	<p>adverse residual effect (less than substantial harm in NPPF terms) was identified to Easton Maudit Conservation Area and Grade I Listed Church of St Peter and Paul (NHLE: 1189610) and Grade II* Listed 22 High Street (NHLE: 1040784).</p> <p>No direct impacts have been identified to designated heritage assets. Identified impacts would be indirect and related to elements of their setting that contribute to their significance.</p> <p>The assessment of heritage impacts has been agreed with the Host Authorities and Historic England [EX7/GH8.3.1_C, EX7/GH8.3.2_C, EX7/GH8.3.3_C, REP6-075].</p> <p>The Applicant highlights Paragraph 5.9.33 of NPS EN-1 "<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>
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SBMP-005	Agricultural Circumstances	Use of Best and Most Versatile Land	<p><u>Best and Most Versatile Land</u></p> <p>EN-1 sections 5.11.12 & .34 not only state that applicants should seek to minimise impacts on BMV land and preferably use poorer quality land but also that the Secretary of State should ensure applicants do not site their scheme on BMV land without justification.</p> <p>EN-3 section 2.10.21 goes further and for solar schemes says where possible it should utilise suitable previously developed, brownfield, contaminated or industrial land; where agricultural land is necessary, poorer quality should be preferred, avoiding BMV where possible.</p> <p>This project covers approximately 1,200 hectares of predominantly agricultural land. The total BMV land affected is 854.5 hectares, around 65% of the scheme and some individual sites have exceptionally high proportions of BMV, including Site D at 90.2% BMV.</p> <p>EN-3 stresses that the applicant must demonstrate the policy expectation of minimisation and preference for poorer land and</p>	Please refer to the Applicant's response to SB-001 and SA-001 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] and the response to SAMP-002 above.
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			<p>whether the justification meets the standard implied by EN-1.</p> <p>A scheme that is 65% BMV is not starting from a position of minimisation. It is starting from a position that contradicts these National Policy Statements.</p>	
SBMP-006	General	Project Lifespan and Decommissioning	<p><u>Duration, repowering and the absence of hard decommissioning security</u></p> <p>EN-3 section 2.10.140-142 states an upper limit of 40 years is typical and that the time limited nature is likely to be an important consideration for the Secretary of State including a DCO requirement to secure decommissioning after the permitted operation.</p> <p>The critical question therefore is:</p> <p>If 40 years is typical and time-limited consent is an important consideration, what is the justified basis for 60 years here and what precisely is secured, not promised, to ensure that after that period the land is restored and the infrastructure is removed?</p> <p>On this point, ownership change is possible (indeed Island Green Power's own ownership has</p>	<p>Please refer to the Applicant's response to SA-004 and SB-006 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070].</p>



			<p>changed hands to Macquarie Group) and there seems to be no guaranteed mechanism to secure decommissioning funding regardless of ownership.</p> <p>EN-3 2.10.138 requires the Secretary of State to ensure outline decommissioning plans are put forward and that land is restored to a suitable use. Are we satisfied that there is an enforceable mechanism that makes decommissioning credible over 60 years?</p>	
SBMP-007	Other Environmental Matters	Battery type and safety	<p><u>BESS near Grendon</u></p> <p>A 500MW BESS is proposed by this scheme.</p> <p>With other BESS installations, either operational or consented, locally this amounts to nearly 600MW concentrated near Grendon.</p> <p>The question today is whether this scale and concentration is acceptable in this location.</p> <p>The risks posed by BESS will have been previously detailed but I note that the Government itself seems to be recognising these.</p> <p>In a letter to me on 24th November 2025 Minister Michael Shanks</p>	<p>Please refer to the response to CPRE-036 in the Applicant's Further Response to Deadline 4 Submissions [REP6-062] and SB-005 and BL-001 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070].</p> <p>At the present time, battery energy storage systems are not subject to environmental permits. Should this change, the Applicant will be required to obtain the relevant permit. The Applicant also notes the Hansard record for the Lords Chamber, Volume 853, debated on</p>



			<p>outlined that the Government is considering integrating BESS into the existing Environmental Permitting Regulations framework in order to deal with safety concerns. If the existing framework of BESS regulations are insufficient, I find it hard to see how this existing proposal can be safe for residents.</p> <p>There is also a well-documented flood risk history and obvious proximity to sensitive receptors and waterways.</p> <p>We know this part of this site is located next to a SSSI – an area protected by law to avoid harm and yet this development may be permitted which cuts straight across that.</p> <p>EN-1 also require that residual flood risk be managed, including the presence of flood warning and evacuation planning.</p> <p>Are we satisfied these have been addressed correctly?</p> <p>Furthermore, the Green Hill BESS will be located on a 43.27 hectares site – to put that into context that it the size of around 60 football pitches, and which – as the</p>	<p>26 February 2026, during which Lord Whitehead advised that “the percentage of fires that you might encounter in an industrial premises or commercial premises is higher than the proportion per thousand of battery fires”, and also confirmed that a protocol already exists within the fire service to deal with battery fires, being “a process of enabling burnout, so that the battery does not self-reignite” which “as far as the fire chiefs are concerned, is a perfectly adequate and safe response to those fires”.</p> <p>The outline Battery Safety Storage Management Plan [REP5-075] has been drafted in accordance with the latest NFCC guidance and any BESS within the Scheme will have been subject to Large Scale Fire Testing.</p>
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			applicant admits - is on agricultural land, over 50% of which is BMV. This is wrong.	
SBMP-008	Cumulative Effects	National Policy Statement	<p><u>Cumulative impacts</u></p> <p>EN-1 requires decision makers to consider the cumulative effects of a scheme on the environment, economy or community as a whole (even if acceptable individually). For my constituents, the cumulative effect is not a theoretical planning concept. It is the lived reality of a development for all the reasons cited before</p>	Please refer to the Applicant's response to SB-006 in the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] .
SBMP-009	General	Recommendation	<p>I will close with the core questions your recommendation must confront</p> <p>1. Alternatives and design. Has the applicant complied sufficiently with EN-1's requirement to provide information about reasonable alternatives and justify the chosen configuration and can you be satisfied the unusually fragmented layout does not unnecessarily multiply harm across communities?</p> <p>2. Easton Maudit and heritage. Has harm to the setting of heritage assets and the settlement's character genuinely been</p>	Please refer to the Applicant's response to SBMP001 to SBMP-006 above and responses to Sarah Bool (Section 2.3) of the Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070] .



			<p>minimised through siting and design and if not, what is the “clear and convincing justification” EN-1 requires for harm within the setting of designated assets?</p> <p>3. BMV land. How does a scheme that is 65% BMV meet the EN-1 and EN-3 expectation to minimise BMV impacts and prefer poorer quality land and is the justification EN-1 anticipates when BMV is used satisfactory?</p> <p>4. Lifetime and decommissioning. Given EN-3 requirements is 60 years justifiable; and what enforceable mechanism makes decommissioning credible over that period?</p> <p>5. BESS. Can you be satisfied of the safety of this scheme and mitigation measures required by EN-1?</p> <p>This proposal unreasonably contradicts the National Policy Statements that govern it and at the very least it is clear that the s104 test of adverse impact outweighing benefits is triggered.</p>	
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2.5 Environment Agency

Table 2.5: [REP6-088](#)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
EA-001	General	Update on SOCG	We are satisfied with the Applicant's continued engagement with us on matters within the draft Statement of Common Ground (SoCG). We provide our updated position on such matters in Appendix 1. We believe it is likely that all matters which remain under discussion can be resolved by the close of the Examination provided there is continued engagement from the Applicant.	The Applicant notes this comment. All matters have since been agreed with the Environment Agency as set out in the Statement of Common Ground [EX7/GH8.3.5_D] submitted at Deadline 7.
EA-002	General	Protective Provisions	Protective Provisions Following further correspondence with the Applicant, it has been agreed that the draft DCO will be updated to include the standard Protective Provisions in favour of the Environment Agency. We look forward to reviewing the updated draft DCO which is to be submitted at Deadline 6.	The agreed protective provisions are included in the draft DCO Revision F [EX7/GH3.1_F] .
EA-003	General	Land Rights	Land Rights We request that the Applicant liaises with the Environment Agency's Estates team at the earliest convenience regarding matters relating to land rights.	The Applicant has historically corresponded with the Environment Agency (EA) since October 2024. Currently, with help from other members of the EA, the Estates Department has been contacted again to ensure all EA Estates matters are covered. The River Nene was originally and specifically



				addressed to ensure the EA did not have any level of ownership as the river itself is unregistered. The EA confirmed this to be correct. Further to this various GIS mapping formats have been offered to help the Estates Team to review any interests within the Order Limits. Correspondence will continue to the satisfaction of the EA.
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2.6 National Highways

Table 2.6: [RE6-091](#)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NH-001	General	Summary of Updates	<p>Under this specific agenda item, it was explained that the only outstanding concern of NH is in relation to the Requirements in Schedule 2 of the DCO and NH's request that it is listed as a consultee.</p> <p>The Requirements of concerns are 3 (approved details and amendments to them), 10 (Fencing and other means of enclosure), 11 (surface and foul water drainage) and 13 (construction environment management plan).</p> <p>Before turning to the detail, it was noted on behalf of NH that NH's protections elsewhere in the DCO, including in the protective provisions, relate to the road works, cable works and the exercise of certain articles where the exercise is over any part of the strategic road network or land in which NH has an interest. The proposals include development that is in the vicinity of the A45 and safeguards in relation to these works need to come through the Requirements and NH being consulted on certain details prior to approval by the local planning authority.</p> <p>NH is not averse to NH approvals being dealt with elsewhere in the DCO on the</p>	<p>The Applicant notes this comment. Further to discussions with National Highways, the Applicant has updated the Outline Construction Environmental Management Plan [EX7/GH7.1_D] to address NH's concerns in a proportionate manner, as set out below.</p>



			<p>matters below, but a natural place is to include NH as a consultee before approvals are given. Unless NH is stipulated as a consultee then consultation will not occur as stipulated in Schedule 16 of the dDCO. In the case of a standard planning application that consultation might occur as a matter of course.</p>	
NH-002	Development Consent Order	Requirement 3 (1)	<p>It was noted on behalf of NH that approved documents are the certified documents which include the works plans and access to works plans and the outline management plans. This Requirement is permitting these approved documents to be approved with the planning authority's agreement. It is acknowledged that variations are only permitted where there is going to be no materially new or different effects. NH should, however, be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not result in new or material different effects to the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN. Post hearing note: An example of another DCO where amendments to approved details are to include reference to the relevant highway authority is London Luton Airport Expansion Development Consent Order 2025 (S.I. 2025/463)</p>	<p>The Applicant has updated Schedule 16 in the draft Development Consent Order [REP6-005] to expand the definition of "requirement consultee" to include, for the purposes of an application made under Requirement 3, any consultee in relation to the approved document. This amendment ensures that it is not left to the discretion of the relevant planning authority whether or not to consult on amendments to approved documents, and also applies to any named consultee and not just National Highways. The Applicant considers this amendment addresses NH's concern.</p>



NH-003	Development Consent Order	Requirement 10 (1)	<p>NH is seeking to be added as a consultee. NH should be given the opportunity to review the details of any proposed fences, walls or enclosures if within the vicinity of the SRN for reasons of safety, liability, and maintenance and to ensure compliance with paragraph 57 of DfT Circular 01/2022 which sets out any structures “must be located outside of the highway boundary of the SRN. In general terms, structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot topple on to the SRN or undermine its geotechnical integrity. Moreover NH is concerned about the stability of fencing near the SRN to ensure that it is not capable of being blown onto the carriageway. Post hearing note: An example of a DCO where NH have had a specific Requirement is The Ferrybridge Multifuel 2 Power Station Order 2015 (S.I 2015/1832). This DCO has a separate Requirement which reads as follows: 11.— (1) The authorised development must not commence until written details of the design and construction of any fencing on the boundary of the authorised development with the A1(M) have been submitted to and, after consultation with the Highways Agency, approved by the planning authority. (2) The authorised development must be carried out in accordance with the approved details. (3)</p>	<p>The Applicant continued discussions with National Highways following issue specific hearing 6. As a result of these discussions, the Outline Construction Environmental Management Plan (oCEMP) [EX7/GH7.1_D] has been updated to require consultation with National Highways where any works are proposed in close proximity or adjacent to the Strategic Road Network. A non-exhaustive list is provided, including fencing and temporary drainage. This is considered to be a proportionate approach to consultation that effectively addresses NH’s concern.</p> <p>NH has confirmed it is happy with this approach and no longer seeking to be added as a consultee into Requirement 10 (fencing) or Requirement 11 (surface and foul water drainage). This is confirmed in the Statement of Common Ground [EX7/GH8.3.7_B]</p>
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			<p>The authorised development must not be brought into commercial use until the fencing has been completed. NH is again seeking to be added as a consultee. NH should be given the opportunity to review the details of the surface water and foul water drainage system to ensure the integrity of the SRN drainage infrastructure is not interfered with and that any plans are in accordance with DfT Circular 01/2022. Particular attention must be given where the drainage is adjacent to the SRN or National Highways land, as changes in water management could directly affect the SRN asset. No surface water run-off from the development shall be discharged into the SRN drainage systems. No new drainage connections from third party developments will be permitted. Inclusion of drafting in red would address NH's concern.</p>	
NH-004	Development Consent Order	Requirement 13	<p>NH should be given the opportunity to review the details of the construction environment management plan to ensure mitigation of environmental impacts during the construction phase and to ensure the SRN is not adversely affected by noise, dust, or other construction- related issues. The plan does include sections on transport and access. Inclusion of drafting in red would address NH's concern. Post hearing note: It is common for relevant highway</p>	<p>The Applicant continued discussions with National Highways following issue specific hearing 6. As a result of these discussions, the outline Construction Environmental Management Plan (oCEMP) [EX7/GH7.1_D] has been updated to require consultation with National Highways where any works are proposed in close proximity or adjacent to the Strategic Road Network. A non-exhaustive list is provided, including construction activities that could generate</p>



			authorities to approve CEMPs and example DCO's include: M5 Junction 10 Development Consent Order 2025 (S.I. 2025/795); M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022 and The Associated British Ports (Immingham Eastern Ro-Ro Terminal) Development Consent Order 2024.	dust. This is considered to be a proportionate approach to consultation that effectively addresses NH's concern. NH have confirmed they are happy with this approach and are no longer seeking to be added as a consultee into Requirement 13 (construction environmental management plan). This is confirmed in the Statement of Common Ground [EX7/GH8.3.7B] .
NH-005	Development Consent Order	Protective Provisions	It was confirmed on behalf of NH that the protective provisions as currently in the dDCO are not agreed but agreement has been reached on a set of protective provisions which NH understands will be incorporated into the DCO at the next deadline and, therefore, NH do not need to make any further representations on the protective provisions.	The agreed form of protective provisions were included in Revision E of the draft DCO [REP6-005] and show as tracked changes in [REP6-006] .