Green Hill Solar Farm

EN010170

The Applicant's Response to Stop Green Hill Solar

Prepared by: Lanpro

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Contents

Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 7

The Applicant's Response to Stop Green Hill Solar Farm

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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 Stop Green Hill Solar 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 10 WRs were submitted to the Examining Authority by Stop Green Hill Solar 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.

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
OPROWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan

Acronym	Document Name
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 Stop Green Hill Solar

2.1 Landscape Note – Carly Tinkler

Table 2.1: [REP6-102]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CT-001	Landscape and Visual Impacts	Introduction	This note deals with landscape and visual matters. It was prepared by Carly Tinkler CMLI on behalf of Stop Green Hill Solar (SGHS), for submission at Deadline 6. It combines SGHS's ISH5 oral submission on landscape and glint and glare, and the group's response to ExQ 3.7.1	The Applicant notes this comment
CT-002	Landscape and Visual Impacts	Introduction	**Landscape and Visual Effects (Part 1)** This note summarises my current position, which is slightly different from my position as set out in my Deadline 5 response. It also responds to ExQ 3.7.1. At Deadline 5, SGHS submitted comments [REP5-121] on the Applicant's Deadline 4 submission Applicant Responses to Stop Green Hill Solar [REP4-021]. The note explained my position on landscape and visual effects, and set out residual matters agreed and not agreed. At that point, the matters remained as per my WR landscape report and appendices (REP1-195 and REP1-193 respectively), and summarised in later responses. For reasons explained in my report and elsewhere, in summary, my position on the	The Applicant notes this comment.

			following matters at Deadline 6 is unchanged:	
CT-003	Landscape and Visual Impacts	Methodology	1. I agree that for many receptors, visual effects would remain significant adverse for the duration of the operation. However, in my opinion, in several cases, levels of effects would be higher than assumed in the Applicant's LVIA. 2. I also agree that between Years 1 and 15, indirect effects on the character of the landscapes within 1km of the site's boundaries would be significant adverse. However, in my opinion, levels of effects on the landscapes closest to the sites would be higher than assumed. 3. I do not agree that at Year 15 and beyond, the indirect adverse effects on the character of the landscapes within 1km of the sites' boundaries, and closest to the sites, would reduce to the point where they no longer breach the significance threshold, remaining significant adverse until the end of the project. 4. I do not agree that at Year 15 and beyond, there would be significant beneficial effects on the sites' landscape 'fabric' (or 'elements'), and I do not agree that when the project was decommissioned, there would be 'long-term legacy landscape benefits'.	The Applicant notes these comments and has responded below.

CT-004	Landscape and Visual Impacts	Methodology	Another matter which remained unresolved at Deadline 5 was that the Applicant's LVIA did not assess direct effects on the overall character of the sites, only on the sites' landscape 'fabric'. 'Fabric' is one of many aspects of overall landscape character, which include a variety of key characteristics, qualities, and natural, cultural, aesthetic and perceptual factors. My own assessment concluded that direct effects on the overall character of the sites would be significant adverse for the duration of the operation, and could not be mitigated.	GLVIA3 is not prescriptive, only providing guidelines for the approach to Landscape and Visual Impact Assessment (LVIA). This allows for some degree of professional differences in approach to LVIA to be incorporated into methodologies for LVIA, however the core approach and principles of any LVIA must align with GLVIA3. As stated, the Methodology for the **LVIA [REP6-017]** has been progressed and agreed with the Local Planning Authorities. The **LVIA [APP-045]** recognises the change in land use required to accommodate a green field solar development and the adverse impacts that this has on the character of the individual sites themselves. It is fully acknowledged that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected, with the land now presenting as a large scale solar scheme. At the point the Scheme is decommissioned the landscape proposals help provide the long term legacy landscape benefits as set out within the **LVIA [APP-045]**. However, the Applicant maintains that solar projects, with the exception of the footprint of any buildings, are 'overlaid' on the landscape allowing the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area.

				The **LVIA [APP-045]** takes into account the effects on landscape character in detail and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The **LVIA [APP-045]** acknowledges a significant adverse effect to landscape character within the 1km Study Area during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure within the individual Sites. Adverse effects remain through to the decommissioning phase, although reduced and no longer Significant as a result of the establishment of the mitigation planting. The **LVIA [APP-045]** describes landscape fabric as the individual tangible elements or features such as landform, woodland, hedges, tree cover, vegetation that make up a landscape or site. These can usually be described and quantified. Para 8.4.21 sets out that (Authors emphasis): "*The Landscape Fabric of the Sites themselves is considered a landscape receptor which will be assessed separately to the relevant Landscape Character Areas*." As per the Methodology, this approach has been followed throughout the LVIA.

CT-005	Landscape and Visual Impacts	Methodology	However, the Applicant's Deadline 5 submission now confirms that there would indeed be direct significant adverse effects on the character of the sites for the duration of the operation. The comment is in REP5-088 Applicant's Comments on Further Commentary to ExA Second Written Questions, on page 14 of the PDF, at item 2.2 Stop Green Hill Solar, Ref: SGHS-09, Question ExQ 2.13.2 Mitigation planting. It states, 'The LVIA… acknowledges that there would be an immediate change to the character of the Sites themselves… and that this would result in Significant Adverse Effects', and 'It is fully acknowledged that the character of the Site itself… would be Significantly Adversely affected'. I agree with this conclusion, but it was not made clear in the LVIA (see Part 2 below).	The Applicant notes this comment.
CT-006	Landscape and Visual Impacts	Methodology	During ISH5, the Applicant's landscape expert said he agreed with the above. There are other aspects of the Applicant's LVIA with which I still do not agree, but those of most relevance are as set out above. The following section was not read aloud at ISH5 but is included for ease of reference as it is a summary of the main reasons why	The Applicant notes this comment.

			the above matters are not agreed, in response to ExQ 3.7.1.	
CT-007	Landscape and Visual Impacts	Methodology	**Landscape and Visual Effects (Part 2)** At Deadline 5, my position remained as set out in my landscape report [REP1-195], and the appendices to my report [REP1-193], and summarised variously in REP1-195 (landscape report summary); REP3-101 (SGHS's Deadline 3 Summary of Oral Submissions to ISH-2); REP4-044 (SGHS's Deadline 4 submission); and REP5-121 (SGHS's responses to the Applicant's Deadline 4 submission).	The Applicant notes this comment.
CT-008	Landscape and Visual Impacts	Methodology	In a nutshell, I agreed, and still agree, that for many receptors, visual effects would remain significant adverse for the duration of the operation, and that in some cases, mitigation is not possible. However, in my opinion, in many cases, levels of effects would be higher than assumed because the LVIA does not factor in a) the high levels of adverse effects resulting from the total loss of a good view; b) the proposed screening measures being uncharacteristic; and c) it being highly unlikely that existing (and proposed) vegetation would continue to screen views for the duration of the operation. I also agreed, and still agree, that between Years 1 and 15, the indirect effects on the character of the landscapes within 1km of	The **LVIA [APP-045]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included within **ES Appendix 8.1 [REP6-017 to REP6-019],** which has been progressed and agreed with the Local Planning Authorities. The LVIA has not 'double counted' the proposed landscape / visual mitigation proposals. As set out in the Applicants

			the site's boundaries would be significant adverse. However, in my opinion, levels of effects would be higher than assumed and would fall not below the significance threshold, partly because the LVIA underestimates levels of landscape receptor sensitivity. I do not agree that at Year 15 and beyond, the indirect adverse effects on the character of the landscapes within the Local Study Area would reduce to the point where they no longer breach the significance threshold, mainly because the LVIA does not factor in a) non-visual effects on character, and b) the adverse effects arising from the proposed screen planting that would result in loss of characteristic openness. I do not agree that by Year 15 and beyond, there would be a significant beneficial effect on the sites' landscape 'fabric' – which in LVIA is most commonly called 'landscape elements', ie trees, hedges, roads and so on. That is because the LVIA erroneously assumes that proposed landscape / visual mitigation measures such as planting hedges and trees to screen views can be double counted as landscape / visual enhancements. In fact, at best, the effect would be Neutral, at worst significant adverse, the latter due to a) the planting being uncharacteristic (tall hedges), and b) the loss of characteristic openness.	response to CT-004 above, the LVIA has considered the Landscape Fabric of the Sites themselves as a separate landscape receptor which has been assessed separately to the effects on Landscape Character. tall hedgerows, and loss of openness (as examples) are both considered within the assessment of the effects of the Scheme on Landscape Character. It is the Applicants position that the findings of the LVIA are robust and remain sound. Legacy Landscape is where, because of the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The landscape proposals are substantial and the beneficial effects associated with these to landscape fabric are set out within the LVIA, with these beneficial effects only associated with the tangible gains provided to landscape fabric. The landscape mitigation proposals would result in: • Green Corridor & Woodland Planting: 14.4ha

			For the same reasons, I do not agree that when the project was decommissioned, there would be 'longterm legacy landscape benefits.	• Enhanced Riparian Native Planting: 12.85ha • Hedgerow Reinforcement & Reinforced Roadside Vegetation: 35.24km • Proposed Hedgerows: 15.5km • Groundcover: 1,130.58ha At decommissioning, as infrastructure is removed there would be an overall benefit to the character of the area with landscape mitigation retained providing long term benefit towards legacy landscape. Following decommissioning, the Site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the Scheme, the landscape would be left in a better condition than current day. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems.

CT-009	Landscape and Visual Impacts	Methodology	This section explains in more detail the issue of the Applicant's LVIA not having assessed direct effects on the overall character of the sites, only on the sites' landscape 'fabric', and the recent change (at Deadline 5) in the Applicant's position outlined above. Firstly, in the Applicant's LVIA [APP-045], paragraph 8.9.26 states that 'The character of the Sites themselves and their immediate surroundings would be adversely affected', but does not state the level of effect, nor whether the level would be significant. See [APP-081] Appendix 8.3: LVIA Assessment Sheets, page 611 of the PDF which is Table Green Hill: Assessment of Cumulative Site Effects. The list on this page is 1) landscape 'fabric', 2) local study area, 3) wider study area, and 4) outer study area. The landscape character of the sites themselves is not mentioned.	The **LVIA [APP-045]** takes into account the effects on landscape character in detail and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The **LVIA [APP-045]** acknowledges a significant adverse effect to landscape character within the 1km Study Area during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure within the individual Sites. The impact on the character of the individual sites is discussed within the **LVIA Assessment Sheets, Revision A [REP1-041].** The **LVIA [APP-045]** recognises the change in land use required to accommodate a green field solar development and the adverse impacts that this has on the character of the individual sites themselves. It is fully acknowledged that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected, with the land presenting as a large scale solar scheme for the lifetime of the Development. At the point the Scheme is decommissioned the landscape proposals help provide the long term legacy landscape benefits as set out within the **LVIA [APP-045].**

				The **LVIA [APP-045]** contains detailed descriptions of the character of each individual Site. **Appendix 8.4: Landscape Character Area Descriptions [APP-082]** contains details and extracts of published landscape character documents available within the Study Areas for the Scheme. Appendix 8.4 also includes interpretation and expansion of those characteristics relevant to the individual Sites and a detailed identification of Landscape Character is contained within the **LVIA [APP-045]** within Section 8.6 Baseline Conditions.
CT-010	Landscape and Visual Impacts	Methodology	Note that regarding 2) local study area, LVIA para. 8.4.20 is clear that the 'Local 1km Study Area… is the 1km area extending as a radius from the outer boundary of the Sites', ie it does not include the sites. Turn to [APP-081] Appendix 8.3: LVIA Assessment Sheets, page 629 of the PDF, where the heading is Individual Site Assessments. The next page is Landscape Fabric. The following pages deal with effects on the sites' landscape fabric, but not their overall character. Note that 'fabric' – aka elements – is only one aspect of character.	The assertion taken by Mrs. Tinkler is incorrect. The Study Areas includes the Sites. Rather than using a central point within the individual Sites and generating a study area radiating out from this singular point, the outer boundary of the Sites has been used to generate the Study Areas. This ensures that the Study Areas extend fully from the Sites (allowing for their geographic spread) rather than being short (the distance from a central point to the extents of the boundary). This approach is standard for large scale geographically distributed sites. As with the development of any green field site, the **LVIA [APP-045]** recognises the change in land use required to accommodate the development and the adverse impacts that this has on the character of the individual sites themselves. It is fully acknowledged that

				the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected, with the land within the Sites (proposed for infrastructure) presenting as a large scale solar scheme for the lifetime of the Development. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*."
CT-011	Landscape and Visual Impacts	Methodology	Now go to PDF p. 668, and the heading Landscape Character - The 1km Study Area (The Local Study Area) (Individual Sites). Note the heading includes 'individual sites', but this section only describes the character of the sites, and reports effects on the landscapes within the 1km area extending as a radius from the outer boundary of the Sites, not effects on the overall character of the sites themselves. Either the levels of effects which are reported are direct adverse effects on the character of the sites, or, they are indirect effects on the character of the landscapes within 1km of the sites. They cannot apply to both.	Please see Applicants response to 'CT-010' above.
CT-012	Landscape and Visual Impacts	Methodology	In fact, in the assessment sheets, the LVIA does acknowledge significant indirect adverse effects on landscapes within 1km of the sites between Year 1 and Year 15.	Please see Applicants response to CT-010 above.

			Evidently, levels of direct effects on the character of the sites would be even higher and could not be mitigated. As mentioned previously, there are other aspects of the Applicant's LVIA's method and interpretation of the guidance with which I still do not agree, or do not understand. For example, why all the landscapes within the 5km study area are categorised as being of Medium sensitivity when there are obvious notable localised variations. This has implications for judgements about levels of effects	The **LVIA [APP-045]** has undertaken a robust assessment of the sensitivity of landscape receptors. The judgement on landscape sensitivity is based on consideration of both the landscape receptor's value and its susceptibility to change arising from the Scheme. Details on how landscape value and susceptibility have been assessed are set out within the **LVIA Methodology, Appendix 8.1 [REP6-017].** **Appendix 8.3.2.2 (Revision A) [REP1-041]** sets out an assessment of the Value, Susceptibility and Sensitivity for Landscape Character for each of the individual Sites within the Scheme within each of the 3 Study Areas. This approach has allowed for the individual characteristics and local variation that are present within the landscape in and around each of the individual Sites to be fully accounted for within the assessment of Landscape Sensitivity.
CT-013	Landscape and Visual Impacts	Methodology	The fact that there is agreement between the Applicant's and Councils' landscape experts about the LVIA method and approach (as emphasised by the Applicant in responses) does not alter my position on those matters. Also, the Councils are still expressing concerns about certain aspects of the LVIA (for example cumulative effects; mitigation effects; visual effects; and not factoring in local landscape designations and omitting the localised variations).	There is broad agreement between the Applicant and the Local Planning Authorities on the overall methodology and approach to the LVIA. This is documented within the corresponding SoCGs see North Northamptonshire Council SoCG [**EX7/GH8.3.1_C**] and West Northamptonshire Council SoCG [**EX7/GH8.3.2_C**]. GLVIA3 explicitly recognises that landscape and visual impact assessment involves a

			Indeed, regardless of the reasons why, the Councils appear to agree that levels of adverse landscape and visual effects have been underestimated. Should the Examining Inspectors consider it necessary, the Landscape Institute could be asked to clarify technical points of disagreement relating to LVIA / GLVIA3: they cannot comment on project-specific matters, but the inquiry can be 'anonymised'.	degree of professional judgement, and that different practitioners may reasonably arrive at different conclusions even when applying the same methodological framework. GLVIA3 para 2.25 states: "*Even with qualified and experienced professionals there can be differences in the judgements made. This may result from using different approaches or different criteria, or from variation in judgements based on the same approach and criteria*." GLVIA3 does not prescribe fixed outcomes but provides a structured framework within which professional judgement is applied. As such, differences in conclusions are not unusual and should be examined through the reasoning and evidence underpinning those judgements, rather than being dismissed on the basis of shared methodology alone. In this context, the LPAs final position within the SoCGs that adverse effects may have been underestimated illustrates the inherent subjectivity that exists within LVIA, as acknowledged in GLVIA3, particularly in areas such as sensitivity, magnitude of change, and how these combine to result in significance of effects.
CT-014	Glint and Glare	Assessment	**Glint and Glare** My position on this matter is set out in SGHS's Deadline 4 submission [REP4-044], SGHS Comments on [REP3-074]	The **Glint and Glare Technical Note [REP2-054]** was prepared in response to comments made in written representations and Issue Specific Hearing 1.

			Applicant's Responses to ExQ2, at Q2.13.10 Effect on local roads (for WNC). In paragraph 4.167 - 4.169 of the LIR, reference is made to local roads having been omitted from the glint and glare assessments. The applicant has submitted a further Glint and Glare Technical Note [REP2-054], does this document address these omissions or do you consider further local roads should be included in the assessments?	The Applicant notes that this matter (including the methodology, assessment and outcomes) has been agreed with West Northamptonshire Council under TA-10 of the **Statement of Common Ground [EX7/GH8.3.2_C]**.
CT-015	Glint and Glare	Assessment	This question is directed to WNC, but SGHS would like to draw the Examining Inspectors' attention to REP3-101 (SGHS's Summary of Oral Submissions to ISH-2), paras. 54 – 66, which summarise the reasons (as explained in REP1-193 Appendices to SGHS's Landscape and Related Matters Statement, Appendix CT-I Glint and Glare) why the Applicant's recent assessment of glint and glare effects on local roads has concluded that receptors would only experience Low levels of effects, and why generally, in SGHS's opinion, the Applicant's Glint and Glare Assessment (GGA) [APP-052] is flawed.	The Applicant notes that this question has been directed to West Northamptonshire Council. The Applicant has previously responded to REP3-101 in the **Applicant's Response to Stop Green Hill Solar [REP4-021]**, please refer to responses to SGHS-082 to SGHS-085.
CT-016	Glint and Glare	Assessment	Regarding local roads specifically, the first paragraph of REP2-054 Section 2.1 Road Infrastructure – Local Roads states that 'Based on industry guidance, technical modelling is not recommended for local	The Applicant notes that this matter (including the methodology, assessment and outcomes) has been agreed with West Northamptonshire Council under TA-10 of the **Statement of Common Ground [EX7/GH8.3.2_C]** and North Northamptonshire Council under **TA-10**

			roads, where traffic densities are likely to be relatively low'. Firstly, the 'industry guidance' is precisely that – there is no independent GGA guidance. Secondly, the qualifying note to the above sentence in terms of traffic densities being relatively low (which is also a criterion for assessing effects on the safety PRoW users, as opposed to amenity which is not assessed) is that 'therefore, a glint / glare event would not result in large numbers of casualties / fatalities, unlike an air, rail, or major road accident'. In SGHS's opinion, even one casualty / fatality should be of great concern, especially if the risks were identified but not mitigated.	**of the Statement of Common Ground [EX7/GH8.3.1_C].** This was further confirmed in North Northamptonshire's response to the Examiners Third Written Questions **[REP6-082]** where NNC '*confirm that on reviewing the addendum to the Glint and Glare assessments to consider the impacts on local roads within NNC's jurisdiction [REP4-026], NNC confirms that this satisfies our requirements. The assessment follows the methodology and screening process that was discussed ahead of carrying it out. The results identify a low impact on road users, and we offer no alternative conclusions to those contained within the report*'.
CT-017	Glint and Glare	Assessment	I understand that an opposition group has appointed an expert to review the informal guidance which the Applicant's glint and glare consultants have relied on, this person having produced much of the data used by the firm which produced the guidance. If this becomes available before the close of this Examination, it could be made available. During ISH5, the Applicant's glint and glare expert did not have any comments on the above.	The Applicant acknowledges this comment and notes that the review has not yet been submitted. In the absence of the documentation being submitted into the Examination, the Applicant team is not in a position to offer comment.

2.2 Ancient Woodlands and Impacts on BESS – Nick Frampton

Table 2.2: [REP6-093]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NF-001	Arboriculture	Ancient Woodlands	Sywell Woods, Horne Wood and Cold Oak Copse all fall within the proposed "Greenhill Solar Farm'. Sywell Woods, is recognised as Ancient Woodland and is part of the West Woods area in Northamptonshire and covers approximately 300 acres. It is one of the woods covered in the Brampton Ash, Hardwick, Sywell and West Woods Forest Plan, managed by Forestry England. Sywell Woods are designated as either an Ancient Semi-Natural Woodland (ASNW) or as plantation on Ancient Woodland Sites (PAWS). Both categories are forms of ancient woodland habitat under UK definitions (ASNW) being woodland continuously since at least 1600 AD, and PAWS being replanted ancient woodland) and are treated as such in planning and conservation policy.	Sywell Wood and Horn Wood are identified and assessed within **Chapter 9: Ecology and Biodiversity [REP6-013]** and **Chapter 19: Arboriculture [APP-056]**. Cold Oak Copse is identified and assessed within **Chapter 9: Ecology and Biodiversity [REP6-013]**, the copse is excluded from **Chapter 19: Arboriculture [APP-056]** as it is outside the 50 m Zone of Influence for arboricultural impacts (the wood is approximately 290 m from the Order Limits).
NF-002	Arboriculture	Ancient Woodlands	Horn Wood and Cold Oak Copse (Easton Maudit) were once part of the medieval woodland associated with Salcey Forest in the area around Easton Maudit. They appear in documents going back to medieval times, including references to the 13th Century, and earlier. These areas	The Applicant notes this comment. Please see Applicant response NF-001 above.

			have also been continuously wooded since 1600 AD and cover 2.8 hectares. Please refer to Doc.rep1-204, LVIA impacts around site F, for relevant details and photographs of Horn Wood, and associated PROWs likely to be severely impacted by the development.	
NF-003	Arboriculture	Ancient Woodlands	This long continuity allows complex, stable ecosystems to develop that simply can't be recreated quickly. These woods consist of natural broadleaf trees, ash lime, and wild service trees (an ancient woodland indicator species), including, pine, birch, hazel, hawthorn, wayfaring tree, spindle and a number of veteran oaks. Their habitats are effectively irreplaceable, because their soils, fungi, plants and invertebrate communities, have developed over centuries. Many species depend on long term woodland conditions and cannot survive in newer woods. If an ancient woodland is destroyed, planting new trees elsewhere does not recreate what is lost.	The Applicant notes this comment. No loss of ancient woodland is proposed as part of the Scheme.
NF-004	Arboriculture	Ancient Woodlands	Horne Wood, along with other woodlands, adjacent to agricultural land provides vital sanctuary, not only for birds, but also for mammals such as hare, badger and at least 3 species of deer. Hare and deer like to spend time out in the open, but if alerted to potential danger, they will quickly revert to woodland cover. There is evidence of frequent heavy 2-way animal traffic, all	The Applicant notes this comment. During the construction at Green Hill F, a 30 m protective buffer will be implemented around Horn Wood to protect it from inadvertent damage. During construction, no site personnel or machinery shall enter the buffer zone, and no equipment will be stored therein. The only exception will be where access for essential/unavoidable operations have been

			around the margins of Horne Wood, although the casual Walker might never see the creatures themselves. Owing to construction activity, restrictive infrastructure and habitat denial, this important feature of woodland biodiversity would be severely impacted in all phases of the development at Greenhill Site F.	agreed in advance with the Ecological Clerk of Works or Arboricultural Clerk of Works. Section 3.5 of the **Outline Ecological Protection and Mitigation Strategy (Revision E) [EX7/GH7.5_E]** (OEPMS) provides an overview of non-standard works which may be required within Biodiversity Protection Areas. With the sensitive design of the Scheme and the mitigation measures outlined in the OEPMS considered, no significant adverse effects on Horn Wood or the associated ecological receptors are anticipated. The full ecological impact assessment for Horn Wood Local Wildlife Site is provided on pages 135-137 of **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision B) [REP6-013]**.
NF-005	Arboriculture	Ancient Woodlands	**Ancient woodlands support a rich web of life including:** Specialist plants, such as bluebells, wood anemone, wild garlic, and dogs mercury, wood spurge, lily of the valley, violet hellebore, Greater wood rush and columbine, fungi and lichens, many of which are rare and highly sensitive to disturbance. Invertebrates, including saproxylic species that depend on decaying wood, birds and mammals, such as bats, dormice, woodpeckers, tree creepers, owls and raptors. This biodiversity exists not just in the trees, but	The Applicant notes this comment and agrees with the statements therein.

			in the woodland floor, deadwood, tree canopies, soils and root systems, which has built up over centuries of tree cover.	
NF-006	Arboriculture	Ancient Woodlands Soils	**Complex soil ecosystems** Ancient woodland soils are incredibly valuable, as they contain established mycorrhizal fungal networks that help trees exchange nutrient and water. The soil structure is stable, rich in organic matter and often undisturbed for generations. These soils store large amounts of carbon, helping to regulate the climate. Once damaged, or destroyed, the soil systems can take centuries to recover, if they recover at all. Unlike managed plantations, ancient woodlands, typically contain, fallen trees, rotting stumps and standing deadwood, all of which support fungi, beetles, flies, mosses and lichens, which in turn, support birds, bats and small mammals. Many rare and threatened species rely on deadwood habitats. Because they have existed for so long, ancient woodlands, have stable microclimates, more resilient to droughts, pests and climate extremes. Ancient woodlands show ecosystems functioning with minimal human interference. They are living laboratories for understanding how woodland ecosystems should function.	The Applicant notes this comment and agrees with the statements therein.

NF-007	Arboriculture	Ancient Woodlands buffers	**Edge effects and buffers.** Protection of the woodlands matters, because, from a habitat and ecological standpoint, Woodlands cannot be recreated or offset and loss leads to permanent biodiversity decline, hence protecting them is an absolute necessity. Development next or close to ancient woodland is detrimental through edge effects. Any changes to light, temperature and humidity, close to the woodland edge, can dry out soils, kill shade loving plants and encourage invasive species. These effects can penetrate up to 10 metres into the woods. The 'Woodland Trust' emphasise the importance of edge effects and their guidelines for buffer zones are set at 50 metres.	As outlined in the **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 5 [REP6-067]** the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]** confirms that minimum 15m buffers will be applied to ancient woodland parcels on the Cable Route Corridor (which includes buffers to all cabling works and construction compounds), and extended 30m buffers around ancient woodlands will be applied to works within the Green Hill Sites (notwithstanding the specific permitted works within the buffer zones). During construction, no site personnel or machinery shall enter the buffer zones by crossing the Biodiversity Protection Fencing and no equipment will be stored therein. The only exceptions will be where access for essential/unavoidable operations have been agreed in advance with the EcoCoW or Arboricultural Clerk of Works (ACoW) – as outlined within Section 3.5 of the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E]**. Within the Sites no infrastructure works will take place within the 15m buffer (no installation of built infrastructure, including cabling). The only works which may take place within the 15m buffer zone are limited to unavoidable, non-intrusive works, such as upgrades to two existing tracks through the use of a 'no-dig' solution and provision of

				permissive paths under Work No. 10. Manual works associated with landscaping and biodiversity mitigation and enhancement measures including planting (using hand tools) are also permitted. Such works will be undertaken under supervision of the project Arboricultural Clerk of Works (ACoW) and Ecological Clerk of Works (EcoCoW). The works permitted within the 15 to 30m buffer are also set out in Method Statement 2 of the Outline Ecological Protection and Mitigation Strategy **[EX7/GH7.5_E].** The 15-metre buffer for ancient woodland is recommended by Natural England and the Forestry Commission to protect ancient woodland; therefore, the provision of up to 30-metres for this Scheme demonstrates that where practicable, the Scheme delivers protection beyond established good practice for ancient woodland. The **Outline Ecological Protection and Mitigation Strategy (OEPMS) (Revision E) [EX7/GH7.5_E]** secures the requirement for and implementation of the 15 m and 30 m buffers.
NF-008	Arboriculture	Ancient Woodlands buffers	Greenhill Solar state that temporary haul roads will run alongside the Cable Route Corrider, in this the Western edge of Sywell woods, which encroaches on to the privately owned airfield. They have confirmed that 'woodland buffers' would	With regards to ancient woodland parcels adjacent to the Cable Route Corridor, a minimum 15 m protective buffer will be applied and implemented for all works in the Cable Route Corridor, as per the **Arboricultural Impact Assessment and**

			not be applied in this area. (PD -011talks of encroachment into the airfield). APP 056 states that a 15 metre buffer has been applied to all Ancient woodlands and that no construction phase impacts to Ancient Woodland are anticipated. Woodlands buffers must be applied to this western edge of this ancient woodland. 15 metres is not an acceptable minimum. APP-056 has subsequently increased the buffer size to 30 m and is supported by the Tree Constraints Plan (APP -470, APP-500). Why have Greenhill Solar not included woodland buffers on the Western Edge of the Sywell woods on this the airfield site? Do they have no agreement in place with the airfield owner?	**Outline Arboricultural Method Statement (Revision A) [REP6-015], Outline Ecological Protection and Mitigation Strategy (OEPMS) (Revision E) [EX7/GH7.5_E]** and **Outline Construction Environmental Management Plan (Revision D) [EX7/GH7.1_D]** . These 15m ancient woodland buffers will be demarcated through the installation of Biodiversity Protection Fencing for the full duration of works within the field/fields adjacent to the ancient woodland. This includes the section of Cable Route Corridor which is adjacent to the western edge of Sywell Wood. Please refer to the Applicant's response to NF-007 above for supporting information regarding the 15 m buffer widths. The 15 m buffer for ancient woodland is recommended by Natural England and the Forestry Commission to protect ancient woodland.
NF-009	Arboriculture	Ancient Woodlands Planning Policy	**National Planning Policy Framework.** Policies recognise that Ancient Woodland is an irreplaceable habitat. Development resulting in the loss or deterioration of irreplaceable habitats (such as Ancient Woodland and ancient trees) should be refused. This applies, not only to direct loss, but also to deterioration which explicitly includes indirect impacts from adjacent development. (pollution,	The Applicant notes this comment. The full ecological impact assessment of woodlands (including ancient woodland) is provided on pages 141-144 of the **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision B) [REP6-013]**. The arboricultural assessment is outlined within **Chapter 19: Arboriculture [APP-056]**. This includes an assessment of effects on ancient and veteran trees and ancient woodlands at

			hydrology, lighting, trampling, fragmentation, noise and light spill) Deterioration explicitly includes indirect impacts, even where development is outside woodland boundaries. Natural England, and Forestry Commission (material consideration in planning decision) "you should refuse planning permission if development will result in the loss or deterioration of Ancient Woodland and veteran trees". All three of these Ancient Woodland areas Sywell Woods, Horne Wood and Cold Oak Copse represent irreplaceable habitats and harm includes indirect impacts from adjacent developments.	the Sites as well as arboricultural features within the Cable Route Corridor. It is the position of the Applicant that, with the measures detailed in the **Outline Ecological Protection and Mitigation Strategy (Revision E) [EX7/GH7.5_E]**, as well as the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement (Revision A) [REP6-015]**, that no significant adverse residual effects (both direct and indirect) on any of the assessed ancient woodlands are anticipated.
NF-010	Arboriculture	Ancient Woodlands Mitigation	**Mitigation cannot justify harm.** *Potential harm and damage to Sywell Wood from the proposed BESS installation in area 'C'.* This proposed option for Bess installation is less than 30 metres from the southernmost edge of Sywell Wood. The boundary touches the hedge, alongside the stream 'Sywell Bottom', which feeds directly into Sywell reservoir, an important wildlife and Country Park. Smoke from a battery fire, could have a significant and long lasting effect on the nearby Sywell Woods. Ancient woodlands are especially vulnerable because they have developed	As a point of clarity, the Applicant would note that the proposed Battery Energy Storage System area in Green Hill C is located approximately 66 m from the edge of the ancient woodland associated with Sywell Wood at its closest point, as shown in **Environmental Statement Figure 4.13.1 Landscape and Ecology Mitigation Plan C and D Option A (Revision B) [REP3-046]**. The Applicant would also note that the watercourse within Green Hill C will be protected through the implementation of protective ecological buffers during construction (as detailed in the **Outline Ecological Protection and Mitigation**

			over centuries with relatively stable conditions.	**Strategy (Revision E) [EX7/GH7.5_E].** Furthermore, a full assessment of ecological impacts on Sywell Reservoir and Country Park Local Wildlife Site (LWS) has been provided on pages 138-140 of the **Environmental Statement Chapter 9 Ecology and Biodiversity (Revision B) [REP6-013].** Given that careful design and embedded mitigation measures have been implemented into the Scheme to minimise any potential impacts during the construction phase, this assessment concludes that no significant adverse effects on this LWS are anticipated. The Applicant has addressed all requisite BESS failure safety issues in both the **Outline Battery Storage Safety Management Plan (Revision B) (OBSSMP) [REP5-075]** and **Plume Study BESS Fire Emissions Modelling Report [APP-167].** The Plume Study identifies that all sensitive receptors within a 1km radius of the BESS areas will be fully risk assessed to demonstrate that a BESS failure incident has no significant off-site impacts i.e. outside the BESS area. With regard to the risk of a battery fire incident, please refer to Appendix A of the **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]** which outlines the consideration towards

				potential impacts to Sywell Wood associated with a fire at Green Hill C (BESS). As outlined in the OBSSMP the detailed design phase of the Scheme will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, the selected BESS design will have completed Large Scale Fire Testing to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. Please refer to the response to NF-015 below in regard to implementation of drainage and pollution prevention principles.
NF-011	Arboriculture	Ancient Woodlands Pollutants	*Damage to trees and plants.* Leaf injury caused by smoke containing pollutants like ozone, nitrogen oxides and sulphur compounds, can reduce photosynthesis, stunt growth and weaken mature trees. Seedling loss can occur: young trees, flora and fauna are particularly sensitive and may fail to establish.	Please refer to the Applicant's response to 'NF-010' above.
NF-012	Arboriculture	Ancient Woodlands Soil Impacts	*Soil and Fungal impacts*. Disruption of soil chemistry easily occurs, leading to changes of soil pH and nutrient balance. Harm to mycorrhizal fungi, weakens tree growth. Reduced	Please refer to the Applicant's response to 'NF-010' above.

			decomposition, changes to microbes and invertebrates, and slow nutrient cycling are all consequences.	
NF-013	Arboriculture	Ancient Woodlands Wildlife	*Effects on Wildlife* Respiratory stress to mammals, birds and insects can occur. Habitat degradation from smoke can kill lichens and mosses, that insects depend on, affecting the wider food web. Displacement, forces animals to abandon territory.	Please refer to the Applicant's response to 'NF-010' above.
NF-014	Arboriculture	Ancient Woodlands air pollution	*Lichens and Mosses (key ancient woodland indicators)* Lichens are extremely sensitive to air pollution and are often among the first organisms to decline. Their loss is a strong indicator of declining air quality.	Please refer to the Applicant's response to 'NF-010' above.
NF-015	Arboriculture	BESS C	*Dangers from BESS C* Grid Scale Battery Storage (large facilities) - as BESS C is proposed to be, will total of 92 containers full of Lithium-Ion batteries, combined with a huge substation. These are the large energy storage systems, whose fires typically produce significant amounts of smoke. Documented grid scale storage facility fires are currently recorded as between 60 -90 globally since 2011. Recently documented BESS incidents 2018-2022 are currently 50 worldwide.	The Applicant has addressed the issue of BESS fire safety in the ISH2 Post hearing notes **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]** under agenda item 3.3. '*As recommended in National Fire Chiefs Council (NFCC) guidelines the Applicant commissioned a Plume Analysis study **BESS Fire Emissions Modelling Report [APP-167]** to assess the environmental impact of a BESS thermal runaway incident to sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill*

			New research from global business insurer QBE, reveals UK fire services faced a fire involving a solar facility, almost once every 2 days in 2024, marking a 60% increase in the past 2 years (2022-2024). Data collected from QBE from Freedom of Information (FOI) requests to UK fire services in August 2025 also reveals fires are rising faster than the rate of installations. (There are currently 1336 operational Solar farms in the UK). Most large BESS fires create substantial amounts of smoke because lithium ion thermal runaway, produces dense toxic fumes. Wind direction is unpredictable and could easily be blowing the smoke from a BESS fire in any direction. If, in the case of BESS C, the wind was blowing due West, it would be catastrophic for this Ancient Woodland at Sywell. If the wind is coming from the North, then Beckworth Emporium, a large and popular retail gardening and dining outlet, averaging over 1000 visitors per day (less than 500m away from the BESS), will be subsumed by toxic fumes and gases, and a likely tragedy will unfold. Mears Ashby, less than 1km would also be significantly affected. There is no documented evidence on how many millions of gallons of water would be needed to put out a BESS fire, as they are	*C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility to the local road network. The BESS Fire Emissions Modelling concludes that there are no significant impacts on sensitive receptors. Nonetheless, at the detailed design stage the Applicant will commission a BESS system and site specific Plume Analysis study to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius*'. Appendix A of **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]** outlines the consideration towards potential impacts to Sywell Wood associated with a fire at Green Hill C (BESS). The **Battery Safety Storage Management Plan [REP5-075]** confirms that each BESS

			all different. How many litres of contaminated water will be contained, how many litres of contaminated water will escape the containment area. Finally, when the Fire Service reach the site and attempt to put out the fire, and the thousand of gallons of contaminated water escape from the containment area, (which they will, due to its limited capacity), this contaminated water will then drain down the natural slope into the adjacent brook (Sywell Bottom) and on into Sywell Reservoir, now known as Sywell Country Park. Sywell Country Park is a valued open water swimming facility, a wildlife haven and one of the top Tench fisheries in the Country. Contamination of this facility would be a major disaster. This is the wrong proposal in the wrong place, initiated by developers who seem to care little about ruining our beautiful countryside, contaminating the local area, devastating ancient woodland and destroying people's enjoyment of the open spaces and the beautiful heritage in this part of Northamptonshire.	area will contain a minimum of two firefighting water storage units of no less than 230,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance). The **Flood Risk Assessment and Drainage Strategy [REP5-021],** and the **Outline Battery Storage Safety [REP5-075] Management Plan** commit to a series of drainage and pollution prevention principles. Runoff will be managed as a discrete drainage catchment via an impermeable and isolatable drainage system. Detailed arrangements agreed at detailed design stage with the Lead Local Flood Authority, the Environment Agency and other relevant consultees. The system will be designed or the reasonable worst case 1 in 10 fire scenario, comprising the full firefighting water volume together with concurrent rainfall up to the 1 in 1 year event. Following any fire event, retained water within the isolated drainage and containment system will be sampled and analysed to determine the level of presence and concentration of contaminants. No discharge will occur until appropriate testing has been completed. Where contamination is identified, the retained water will be removed from site by tanker and transported to an appropriately permitted facility for treatment and disposal. Where testing confirms that water quality is

				suitable for release, discharge will take place in a controlled manner and only following consultation and agreement with the relevant statutory authority. This approach has been agreed with the Environment Agency under HYD-09 in the **Statement of Common Ground [EX7/ GH8.3.5_D]**.

2.3 Land Use, Design Inefficiencies and Cumulative Impacts

Table 2.3: [REP6-099]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LDC-001	Agriculture and Soils	BMV	The applicant intends to take 3,560 acres (1,441ha) of land out of agricultural production, approximately 65% of which is classed as BMV land (NLC Grades 1-3a), for at least 60 years. We do not propose to repeat all the evidence and arguments previously submitted by Stop GHS, in particular in REP1-221 (Objection on Agricultural Issues) to REP1-227. Instead we summarise some key points as follows.	Please see the applicant's responses below.
LDC-002	Agriculture and Soils	Food security	National food security is increasingly under threat due to climate change, geopolitical and economic instability, population rise, and increasing land take for new infrastructure projects and housing. (See Additional Evidence 1-3 below). The UK's ability to feed its people will be incrementally reduced by every new field of PV arrays, especially on currently productive land as is being proposed by the Applicant. This will contribute to higher food prices and increase the carbon cost of feeding the nation	The Applicant acknowledges concerns regarding national food security. However, it is important to note that the proposed Scheme will result in only a temporary and fully reversible change of land use. The agricultural land beneath and around the PV panels will remain available for agricultural use through managed grassland for low-intensity sheep grazing. This would ensure that the Site continues to contribute to food production during the operation.

				The 1200ha land for the proposed Sites only represents 0.01% of 16.8 million hectares of the utilised agricultural area (UAA) and 0.027% of 4.4 million hectares arable land in the UK. This scale of temporary land take is not considered to have any significant effect on national food security. The UK Food Security Report 2024 indicates that as of July 2024, around 250,000 hectares of land have been entered into Sustainable Farming Incentive options that temporarily restrict food from being produced on that land. For context, this is the equivalent of around 3% of England's UAA (9 million hectares). The **Farming Report [APP-571]** noted that in June 2024 this had increased to 305,000 ha, and the latest figures (Defra, 25 September 2025) identified 444,000 ha of arable land in agri-environmental uses, about 9% of all arable land (including ley grassland). Therefore, the 1200ha land for the proposed Scheme is not considered to have a significant impact on national food production

				and security. In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. In addition, 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 **ES Chapter 20: Agricultural Circumstances [APP-057] and section 7 of the Farming Report [APP-571].** 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. In addition, Government policy confirms that solar energy generation is a key component of the UK's legally binding net-zero strategy. National planning guidance does not identify solar farms as a significant threat to food

				security and instead emphasises the need to balance food production with the transition to low-carbon energy. By the end of decommissioning, the land will be restored to its previous agricultural condition, meaning there will be no permanent loss of agricultural land and therefore no long-term reduction in national food-producing capacity. Furthermore, the quality of soils and land quality would be improved as assessed in **ES Chapter 20: Agricultural Circumstances [APP-057]** and stated above.
LDC-003	Agriculture and Soils	Food security	Even with the sparsely populated Scottish Highlands, the UK has the 16th or 17th highest population density (around 285 per square Km) among countries of more than 10 million globally and the third highest in Europe (countries with population over 1 million) and 4-5 times the global overall population density (World bank and Food and Agriculture Org. of the UN). England on its own, with a density of around 450 per sq Km, ranks a close 2nd in Europe and 8th globally (>10 million	The Applicant notes this. Please refer to response LDC-002, which addresses the scale of the temporary land take associated with the Scheme in the context of the UK's utilised agricultural area (UAA). This response also summarises findings from the UK Food Security Report 2024 regarding national food production capacity and confirms that the Scheme will not have a significant impact on food security.

			popn). Productive agricultural land is therefore at a premium in the UK and likely to become more so (See Additional Evidence, below).	
LDC-004	Agriculture and Soils	Food security	There are many persuasive and wide-ranging environmental arguments to support a move towards regenerative agriculture in the UK. However, this is associated with significantly reduced productivity - at least in the short to medium term (Savills Research 8 Feb 2021). Therefore any reduction in land area under tillage will further threaten our national food security. It will also increase pressure to persist with intensive techniques on remaining agricultural land, with all the consequent environmental damage, including CO2 release, and increasing reliance on imported chemical fertilisers. This is in itself another threat to our food security in an unstable world and is likely to increase food prices	The Applicant notes this. Please refer to response 'LDC-002'.
LDC-005	Agriculture and Soils	BMV	In relation to total land area in the UK, a disproportionate acreage of BMV (grades 1-3a) - and other lesser grade but still productive land - is currently being taken out of production for solar arrays and associated infrastructure. This is	Please refer to the responses to SGHS-001 to SGHS-006 in the Applicant's Response to **Stop Green Hill Solar [REP4-021]** in regard to the site selection process and consideration towards the use of BMV land.

			presumably because the most productive agricultural areas have more sunlight, fewer national parks, and larger fields which make solar installations easier and cheaper to construct, thus increasing the developer's profit. This goes against government guidance (NPPF) which states that lower grade land should be prioritised for solar development where possible. The applicant has not given any convincing evidence that it has made a serious attempt to follow this guidance.	As set out in Environmental Statement **Chapter 5: Alternatives and Design Evolution [APP-042]** and **ES Appendix 5.1 Site Selection Assessment of the Environmental Statement Revision A [REP1-037]** there is no standard methodology for the selection of sites for solar energy generating stations. The Applicant acknowledges that the Scheme involves the use of BMV land. However, the **Farming Report [APP-571]** sets out that within the wider area the land is almost all in either the 20-60% BMV or >60% BMV category. It is notable that much of Northamptonshire, particularly to the north and southwest of Grendon, consists predominantly of higher grade land, with a mixture of Grade 2 and Grade 3 often with both Grade 2 and Grade 3 land in individual fields. This significantly limits the ability to deliver a scheme of this scale without utilising higher-grade land. Comparable sites of a similar size elsewhere in the county would inevitably contain similar

				proportions of BMV land. Given the high prevalence of BMV land within the 20 km search area around Grendon Substation, it was not considered feasible to avoid BMV land while still meeting the Scheme's scale and operational requirements.
LDC-006	Agriculture and Soils	Food security	Breaking up areas of farmland land by inserting fields of PV arrays will inevitably increase the distances which farmers and agricultural contractors need to travel in order to get maximum use from their very expensive machinery. This will reduce agricultural efficiency, increase food production costs and may render some agribusinesses non-viable. We feel that this may prove to be a hidden societal cost of the increasing number of solar developments taking place in the heartland of the UK cereal production.	The Applicant notes the concern. However, the Sites of the Scheme and fields are in blocks of land and there is no key farm infrastructure within the Sites. As a result, there will be no severance, disruption and increased travel distances for surrounding agricultural operations. This is addressed in the **Farming Report Chapter 8 [APP-571]** and the individual Farm Reports set out at Appendix KCC5 of that document. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills Supply Chain and Employment Plan [APP- 552]** by Requirement

				20 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**. This may include contracts for land and habitat management, or where practicable, the grazing of sheep on the Solar PV Array sites. Grazing sheep and land management will require labour and will have benefits for the related land-based economy (feed suppliers, vets, hauliers, auctioneers etc).
LDC-007	Agriculture and Soils	Food security	The Applicant states that 'Arable fields occupy the vast majority of land within the cable route corridor and are of little ecological value, therefore no reinstatement protocol is required.' (Outline Ecological and Mitigation Strategy (Revision B) This does not take into account the likely ecological improvements which, in the absence of Green Hill Solar, would otherwise be made in this same arable land during the coming decades, through regenerative practices. We would therefore contest their assertion about need for a reinstatement protocol	The Applicant would note that this quotation is taken from Method Statement 6 of the **Outline Ecological Protection and Mitigation Strategy (Revision E) [EX7/GH7.5_E].** This Method Statement provides details on the specific remedial measures which are required to reinstate habitats which are temporarily affected during cable installation. For example, there are specific measures under Method Statement 6 regarding translocating or replanting of hedgerows which are removed to facilitate cable installation, as well as measures for other habitats, such as grassland, which will be

				re-seeded following cable installation. With regard to arable fields, these areas are routinely ploughed, and therefore no specific ecological reinstatement measures are required to revert this habitat to its previous condition following the completion of cabling works. With regards to the protection of soil health, the **Outline Soil Management Plan (Revision A) [REP6-054]** contains specific soil handling and reinstatement measures relevant to the cabling works which will be followed.
LDC-008	Agriculture and Soils	Soil contamination	Potential for toxic leaching from abandoned underground cables and doubtful return to agricultural use after decommissioning. On 24 August 2024 Bedford Borough Council (BBC) submitted detailed comments to the Planning Inspectorate with regard to the Green Hill Solar planning application. We include the following selfexplanatory excerpt from page 12 of the BBC report: ' 4.12 (§4.4.15) BBC is NOT supportive of leaving the underground cables and ducting in situ. The ducting and cables contain plastics and metals which are toxic and with gradual breakdown have the	**ES Chapter 4: Scheme Description [REP6-011]** paragraph 4.7.3 states '*The underground cable, cable ducts and joint bays will be decommissioned in accordance with the applicable guidance and regulations at the time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground*

			potential to leach into the surrounding ground and groundwater causing contamination. The Applicant should be obligated to return the Sites, Cable Corridors and possible servitudes within the Public Highways used by the Proposed Development, free of such known contamination. It is noted that the statement 'to be left in-situ to minimise adverse environmental effects' is not substantiated. 4.13 (§4.4.17) '…the land within the scheme will be returned to its original use as far as possible…'. It is noted that during the operational stage (circa 60-years), the soil will lie fallow / be unproductive. There is no evidence submitted by the Applicant that after decommissioning the site will revert to arable use for food production / habitat creation. Currently there is limited evidence as to how long it would take to revert the soil back to production potential (see §8.4.3 Habitat Loss). Consequently, the soil should be viewed as lost to agricultural use, unless otherwise evidenced by the Applicant.'	*at regular interval and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. The decommissioning of the Scheme will be addressed within the* ***Outline Decommissioning Statement (ODS) [REP6-045]***'. Requirement 21 in Schedule 2 to the **Draft DCO Revision F [EX7/GH3.1_F]** requires that the detailed decommissioning plan must be prepared. The Plan will have regard to the applicable legislation and policy at that time, and must be approved by the relevant planning authority. The decommissioning plan must be implemented as approved. A failure to comply with the Requirement is a criminal offence, ensuring that the Scheme will be decommissioned appropriately at the end of its life. The soil mitigation approach and management measures during decommissioning stage are included in **GH7.6 Outline Soil Management Plan [REP6-053]**.

				Soil profiles will be reinstated in accordance with a detailed Soil Management Plan, which will be developed pre-decommissioning to ensure that soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil condition and undertake any further remediation that may be required. As decommissioning will take place after approximately 60 years, the soils and land conditions on site may have changed significantly by that time due to changes in the climate. It would therefore be more appropriate to prepare a detailed Soil Management Plan closer to the decommissioning stage. This plan should be developed using the mitigation strategy, approach, and measures outlined in **GH7.6 Outline Soil Management Plan [App-550]**, allowing the mitigation to be tailored to the actual site conditions at that time The land will not require treatment before it can be used for growing crops. The land will likely be able

				to grow crops immediately. Farmers have, for centuries, incorporated grass leys into their cropping cycles and crops benefit from the improvements to the soil from that process. There may be a year or two recovery period in the generally small areas that will be restored following removal of tracks and fixed infrastructure, where soil movement has occurred and soils settle but, as set out in the Farming Report at Table 3 **[APP-571]**, these areas amount to approximately 23.8 ha in total, of which 11.3 ha is BMV. Any adverse effect will be temporary and not significant.
LDC-009	Agriculture and Soils	Land Use	Inherent inefficiencies and cumulative impacts of site design. This project is comparatively large by UK standards, covering 3,560 acres (1,441ha) over multiple sites with an irregular linear layout stretching from Lavendon to Old, more than 22Km in a straight line. The Applicant has claimed that this design results in a lower impact on local communities because individual sites are smaller. We would argue that this is simply an attempt at post hoc justification. They are forced	Please refer to the Applicants responses to SGHS-001 to SGHS-006 of the **Applicant's Response to Stop Green Hill Solar [REP4-021]** in regard to the site selection approach. The cumulative effects of the Scheme have been assessed within the Environmental Statement, please refer to **ES Chapter 25: Cumulative Effects**

			to make this claim simply because they were unable to make the site more compact, efficient and cost-effective. While the impact on any single community might be reduced, the totality of negative impacts and inefficiencies is greater for the following reasons. Compared to a more compact development it requires a much longer total perimeter enclosure and cable route in order to connect to the substation at Grendon. This in turn requires more access points, more perimeter infrastructure and screening to secure and conceal them, and a much larger total cable excavation area and access track construction. Apart from being an inherently inefficient design, this will result in higher carbon cost and more widespread disruption and damage to local landscapes, habitats, soil structure, public amenity and road safety. We have a duty to protect these assets for future generations who can have no influence in the design of this project. Negotiations with a greater number of landowners, compulsory purchase orders, highway and river authorities etc will complicate the process (cabling will need to cross the A43, A45, A509,	**and Effect Interactions [APP-062].** The **Landscape and Visual Impact Assessment [APP-045]** includes an assessment of the Cumulative Effects of the Scheme, including an assessment of sequential effects, where different Sites are revealed in succession as a series of sequential views. The LVIA found that Sequential Effects are not considered to be any greater than those effects identified for the individual sections as set out within **Appendix 8.3 LVIA Assessment Sheets [REP1-041].**

			many smaller rural roads and tunnel under the river Nene). With a planned 60 year operation it will be effectively permanent with significant amounts of infrastructure never removed. Furthermore, when travelling across country, for example on a drive of roughly 32km from Lavendon to Old, via Easton Maudit and Grendon, taking as straight a course as possible, would necessitate seeing solar arrays and infrastructure for virtually the entire 40 minute journey, and even further north as far as Lamport and Mawsley. The cumulative site impact of this, and traffic disruption during construction and decommissioning, will be severe and highly detrimental. (For further details on Landscape and Visual Impact, including PROWs and relevant photographs, please see earlier submissions: Rep1-204 and Rep1-203).	
LDC-010	Agriculture and Soils	Solar Grazing	Sheep. There are UK examples of 'solar grazing' with sheep. This enables grass around solar installations to be controlled with less mowing and can provide supplementary income to those farmers who undertake it. It is much promoted by solar developers and is	There are many successful examples of solar farm grazing, e.g. examples are noted within the Appendix A of the Applicants Responses to **Stop Green Hill Solar [REP4-021]**. The Guardian provided an article on a first-generation Lincolnshire

			proudly featured in every solar brochure. However, this is unlikely to be successful in terms of commercial food production given the huge scale of proposed land take by solar developers in the UK and a lack of necessary skills, infrastructure and market demand. The UK has been self-sufficient in sheep meat every year since 2017. In 2023 home-fed production was 114% of supply for use in the UK. (House of Commons Library debate pack on the Future of Sheep Farming 28 August 2024). Nor does it not address a fundamental problem of this development which is the of loss of cereal production. This, of course, is the bedrock of our national food security - increasingly under threat and something we cannot afford to lose (see Additional Comment 2 below).	farmer, grazing sheep on solar land; highlighting that access to grazing beneath solar arrays enabled one farmer to expand their flock from just 18 acres and 20 sheep to over 250 acres and more than 200 sheep. The article notes that '*Across the UK, a growing number of farmers are discovering that the free grazing opportunities offered by some solar panel sites are a toe-hold in an industry where land is often unaffordable or unobtainable'*. Suggesting that '*There's been a massive acceleration in the last five years in solar grazing' and that it represents 'a really important opportunity for sheep farmers*.' Reference: Guardian Article: Solar grazing: 'triple-win' for sheep farmers, renewables and society or just a PR exercise for energy companies? (Amelia Hill, January 2026) It is also reported that UK sheep meat exports for Jan–Sep 2025 totalled 68,300 tonnes, a 15% increase on the year. Reference: Agriculture and Horticulture Development Board (AHDB) (2025)

				Growing UK lamb exports continue to lend support to domestic prices: Sheep meat Q3 2025 trade update. The Farming Report **[APP-571]** records Defra statistics that at 1 June 2024 3,600ha of solar panel areas on farms were grazed, just under half the total. The 2025 statistic from the same dataset Defra, 25 September 2025) identifies 4,937ha of solar farms on farms as grazed, and 4,563ha as not grazed at 1 June 2025.
LDC-011	Agriculture and Soils	Farming Profitability	Farming Profitability Review 2025. Published by Defra on 18.12.25. This independent report, led by Baroness Minette Batters, presents a detailed analysis of the current state of UK agriculture and a number of recommendations which were designed to be 'consistent with the UK Carbon Budget Framework, as set out in the Climate Change Act, the Environmental Improvement Plan 2023 and to consider alignment with net zero objectives'. Broad in scope, it provides a detailed assessment of short, medium and long-term actions required to strengthen farming profitability and the place of agriculture and rural affairs in UK society. We suggest reading the full	The SGHS synopsis of the Farming Profitability Review 2025 is noted. The Review has focused on the agricultural sector. The Review does not address large-scale solar arrays and so should not be taken as evidence that large-scale solar is not required or supported. The Government's position is set out in multiple documents, including the Solar Roadmap (DESNZ, June 2025) and the Land Use Framework (HM Government, March 2026) as set out in the **Statement of Need [APP-556]** and **Planning Statement [REP6-037]**.

			report but we include below (in italics) a few excerpts from the recommendations which are relevant to this application, with bold highlights added by SGHS for emphasis. Nowhere does the report recommend installation of large scale solar arrays on greenfield sites.	
LDC-012	Agriculture and Soils	Biodiversity Loss	Global biodiversity loss, ecosystem collapse and national security. A national security assessment. Published by Defra on 20 January 2026. This strategic report, developed by analysts and experts across HM Government, including the Joint Intelligence Committee, presents an analysis of how predicted global biodiversity loss and ecosystem collapse could affect UK national security. Its key judgements are, we believe, relevant to this Application and clearly extremely concerning. It shows how environmental degradation can disrupt food, water, health and supply chains, and trigger wider geopolitical instability. It identifies 6 major global ecosystems of strategic importance for the UK and explores how their decline could drive cascading global impacts.	As SGHS note, there are multiple factors to be considered. The Solar Roadmap (DESNZ, 2025) notes that "*the biggest risk to food security and the natural environment is the climate and nature crisis. That is why it is important that the UK takes a leadership role, working with partners around the world, in accelerating to net zero including by rapidly expanding solar power generation*". The Land Use Framework for England, presented to Parliament in March 2026 sets out a framework for the effective use of land. The Framework recognises the importance of building a renewable energy system. Regarding the development of solar farms, it states that the change of use from agriculture to solar farms is small in percentage

			While the Applicant would doubtless argue that solar power generation can be part of the solution, we would argue that in terms of UK security priorities, and taking into account the increasing threats to national food security and the negligible contribution that this solar development would make towards reducing global net carbon emissions, logic dictates that productive UK farmland should be prioritised for sustainable regenerative agricultural crop production, not for inefficient, unreliable and expensive electricity generation. The italicised excerpts below are quoted from the report with bold highlights added to indicate particular relevance to our concerns about greenfield solar developments such as Green Hill Solar.	terms, taken at a national level. It adds that there are opportunities to continue farming alongside solar generation, including through continued livestock grazing and agrivoltaics. Which is supported by the Scheme through the potential for sheep grazing. The Framework also supports the Government's Clean Power 2030 Action Plan and its ambitions for 95% of electricity to come from clean power sources by 2030. It sets out how solar farms can be delivered sustainably though projects such as rewetting lowland peat soils beneath the solar panels. This leads to multifunctionality, delivering greater benefits for a number of uses on the same land. NPS EN-3 does not prohibit the use of BMV land and recognises that NSIP scale solar schemes are likely to include some agricultural land, with the preference being to prioritise poorer quality land. To deliver the proposed capacity for the Scheme, it was therefore considered likely that a significant percentage of BMV land would be required. EN-3 states at paragraph

				2.10.29 that applicants should avoid the use of BMV 'where possible', and this is what the Applicant sought to do in its site selection process. The Scheme will provide substantial planting with new areas of habitat creation and management are proposed within the Scheme as shown as Work No. 9 on the **Works Plans [REP6-003]**. In terms of Biodiversity Net Gain (BNG), the Scheme has committed to a minimum of 47% biodiversity net gain in habitat units, a minimum of 10% biodiversity net gain in hedgerow units and a minimum of 10% biodiversity net gain as secured in the **Draft DCO [EX7/GH3.1_F]**.
LDC-013	Agriculture and Soils	Land Use	The Land Use Framework for England, published by Defra, March 2026. Excerpts quoted from the report below are shown in italics. Page 4: In her foreword the Secretary of State for environment, Food and Rural Affairs The Right Hon Emma Reynolds MP states that it "sets out a coherent national vision for how we use our land"… and "…how we will	The updated **Planning Statement [REP6-037]** submitted at Deadline 6 included reference to the Land Use Framework for England. As outlined in paragraphs 5.6.18 to 5.6.20 *'The purpose of the framework is to set out the effective use of land. It includes a vision for England's future landscape, sets out a new set of principles to inform how*

			safeguard our most productive land…" Page 7: Seven key land uses are identified: housing, energy infrastructure and clean power, food production, nature recovery, resilient landscapes, landscapes for water, and communities. One of the four guiding principles identified is "Right use, right place", meaning that any changes should "play to the strengths of the land". Page 13: Under Energy Infrastructure and Clean Power, it states: "Solar and wind will remain a small proportion of land use, and much of this land will be managed sustainably to boost and deliver other outcomes, such as grazing animals for food production or rewetting lowland peat soils beneath new solar farms." As stated above, SGHS sees no convincing evidence that the Green Hill Solar development includes plans for sustainable management (soil is likely to deteriorate under panels), or significant food production. Page 14: "By 2050 agricultural land will be managed to prioritise sustainable food production and environmental benefits".	*decisions are made about land and includes actions that the Government will take to support land change use, in combination with other stakeholders.* *The Framework recognises the importance of building a renewable energy system. Regarding the development of solar farms, it states that the change of use from agriculture to solar farms is small in percentage terms, taken at a national level. It adds that there are opportunities to continue farming alongside solar generation, including through continued livestock grazing and agrivoltaics.* *The Framework supports the Government's Clean Power 2030 Action Plan and its ambitions for 95% of electricity to come from clean power sources by 2030. It sets out how solar farms can be delivered sustainably though projects such as rewetting lowland peat soils beneath the solar panels. This leads to multifunctionality, delivering greater benefits for a number of uses on the same land'.*

			According to the report this will include increasing woodland cover and wetlands, water management (to conserve water and reduce flooding), restoration of peatlands, wilder river habitats, and wildlife habitats within farming landscapes. These measures will reduce the amount of land available for food production and underline the need to conserve BMV land for sustainable food production rather than solar panels.	The following plans outline and secure implementation of mitigation and management measures during the operational phase: • Outline Soil Management Plan **[REP6-053].** • Outline Operational Environmental Management **Plan [REP6-043].** • Outline Landscape and Ecological Management Plan [**REP6-047].**
LDC-014	Agriculture and Soils	BMV	Page 21: in relation to projected land use changes from now to 2050, the three categories of nature restoration, renewable energy and urban expansion are not suggested for BMV land and "this reflects the approach of the NPPF, which directs development away from BMV land". Where some development is proposed on BMV land "there may be the potential for multifunctionality such as through agrivoltaic systems (installing solar panels above crops)". There is a clear absence of this multifunctionality in the GHS Application which is predominantly on BMV land.	The Applicant notes that the Land Use Framework has defined multifunctionality as part of the four land use principles under Section II; this includes examples such as solar generation designed to enable continued grazing of animals and provision of biodiverse habitats. Page 21 acknowledges that, it is for farmers and landowners to decide how best to use their land and some development or habitat restoration may still be proposed on BMV land. Therefore, the retention of BMV land for agricultural use is not guaranteed, even when control is

			Page 22: "One of the opportunities supported through consultation responses was prioritising land use changes in areas that are less suitable for high-value sustainable agriculture. This allows other benefits such as environmental improvement, to be maximised while keeping more of the BMV agricultural land for producing food." Page 28: "Adaptive by design: land use policy and delivery should be flexible enough to incorporate new evidence, respond to emerging needs and challenges, and evolve with changing local and national priorities." Surely this is a strong argument against a 60-year DCO. Page 35: "Keeping landscapes productive for food. The Government is clear that food security is national security. We agree with consultation respondents who called for strategic safeguarding of the best farmland from permanent land use changes..." Page 45: "Access and recreation. We want people to be able to access and enjoy green and blue spaces…" Many aspects of the GHS development would severely degrade both access and public enjoyment of the green spaces, for example in Site	retained by the farmer and landowner. It is to be noted that grazing throughout the year may be employed for management of areas of the Sites where panel arrays are proposed as outlined in paragraphs 4.6.28 to 4.6.30 of the **Outline Landscape and Ecological Management Plan [REP6-047]**. As such, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. The Scheme will provide substantial planting with new areas of habitat creation and management are proposed within the Scheme as shown as Work No. 9 on the **Works Plans [REP6-003]**. In terms of Biodiversity Net Gain (BNG), the Scheme has committed to a minimum of 47% biodiversity net gain in habitat units, a minimum of 10% biodiversity net gain in hedgerow units and a minimum of 10% biodiversity net gain as secured in the **Draft DCO [EX7/GH3.1_F]**.

			F around Easton Maudit and Horn wood.	In regard to the fourth principle: adaptive by design emphasizes planning for future climate change impacts. This aligns with NPS EN-1 for example, which confirms the need to factor the effects of climate change into any Flood Risk Assessment. Paragraph 4.10.13 advises that the latest UK Climate Projections and associated research and expert guidance (such as the EA's 'Flood Risk Assessments: Climate Change Allowances' Guidance (February 2016; last updated May 2022) should be used to ensure appropriate mitigation or adaptation measures are identified to cover the estimated lifetime of the Scheme. The Scheme has incorporated several climate change resilience measures. Adaptability can be achieved through the use of the Rochdale Envelope, supported by **Concept Design Parameters and Principles [REP6-039]**, as well as management plans that allow for refinement at the detailed design stage in accordance with relevant planning policy and subject to

				approval by the relevant statutory consultees. In regard to Access and Recreation, several permissive paths are incorporated into the Scheme design, as shown on Work No.10 on the **Work Plans [REP6-003]**. The permissive paths will contribute to the wider network of Public Rights of Way in the area and facilitate greater public access to the Countryside. Impacts to individual existing PROWs have been assessed in **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]**, with mitigation measures for visual impacts and impacts on use set out in the **Outline Landscape and Ecological Management Plan (Revision E) [REP6-047]** and **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]**, secured by Requirements 7 and 18 respectively of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.
LDC-015	Agriculture and Soils	Food security	**Conclusions** 1. In its overall layout, the Green Hill Solar design contains fundamental flaws which are	Please refer to the responses to 'LDC-001' to 'LDC-014' above.

			damagingly inefficient and would cause unacceptable environmental and social impacts. 2. It would take a large amount BMV land out of production for more than 60 years during which time the soil will lose fertility and the Applicant offers no guarantees that it will ever be fully restored to its former use or that the ground will not be exposed to the possibility of toxins leaching out of abandoned infrastructure. 3. The evolving national debate regarding agriculture, land use and food security, as evidenced by three recent UK Gov. reports, echoes our widely shared opposition to the use of prime agricultural land in this way. It should instead be developed through regenerative agricultural practices to continue producing local food for the UK population in a sustainable manner whilst enhancing soil health, biodiversity, carbon fixation	The land under and around the solar arrays will not be taken out of production. The areas will be sown to grassland mixes and these will be maintained, either mechanically or by grazing with sheep or a combination of the two. There will be benefits to soils from the change, which is mostly a change from intensive arable cropping. These benefits are set out in the **ES Chapter 20: Agricultural Circumstances, at sections 20.8.14 to 20.8.20 [APP-057] and the Farming Report Chapter 7 [APP-571].** These are identified as benefits. The soils will not lose fertility, and will result in improvements to soil organic carbon, organic matter levels, earthworm populations and reduced erosion (water and wind).

			and landscape value for nature and society.	

2.4 Decommissioning

Table 2.4: [REP6-094]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
ODS-001	Decommissioning	Decommissioning Statement	Green Hill Solar Farm's: 'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'. The above noted document forms part of the Green Hill Solar Farm's application for the proposed solar farm/ BESS development. This document is generalised in content and lacks specific details in areas, particularly the remediation to the agricultural land. These matters, and other factors, are addressed, within the following response. Important issues that stand out from this 'Outline Commissioning Statement' are as follows:	The Applicant notes this comment.
ODS-002	Decommissioning	Decommissioning Statement	Section 1.2.1 – "A Decommissioning Environmental Management Plan [DEMP] [or multiple DEMPs] and Decommissioning Traffic Management Plan [DTMP] will be produced and approved for the Scheme following the appointment of a contractor, prior to the commencement of the decommissioning phase of the Scheme. Approval and implementation of the DEMP and the DTMP will be secured through a Requirement of the DCO."	The Applicant notes this comment.
ODS-003	Decommissioning	Decommissioning Statement	Section 2.1.3 – "The underground cables [33kV, 132kV and 400kV] may be left in situ, depending on which method is likely to have the least environmental impact at the time. Currently, the most environmentally acceptable option is leaving the cables and any ducts in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the	The Applicant notes this comment.

			extraction point, avoiding the need to open up the entire length of the cable route. Any cabling removed will be taken to an appropriate facility for recycling".	
ODS-004	Decommissioning	Decommissioning Statement	Section 2.1.7 – "The soil is anticipated to have undergone up to 60 years of recovery given that while the Scheme is operational, the land will be used for lower intensity farming practices, such as for sheep grazing or being left fallow. It is therefore expected to be of the same or better quality once decommissioned, as it is at present."	The Applicant notes this comment.
ODS-005	Decommissioning	Decommissioning Statement	Section 2.1.8 – "Where localised soil compaction occurs from the presence of structures such as the substations or the BESS; or the weight of mobile machinery used through construction, operation and decommissioning, management measures are identified to alleviate compaction [e.g., through ploughing and aeration], to maintain soil structure and enable reinstatement of the land to its original use".	The Applicant notes this comment.

ODS-006	Agriculture and Soils	Decommissioning Statement – Soil management	**1. Reversion of land back to agricultural use.** Green Hill Solar Farm only provides draft details for the ultimate decommissioning of their installations, which are lacking in scope, along with proposals for the reinstatement of the land, following the completion of the contract. Green Hill Solar Farm try to give the impression that at the end of the 60 years contract period, the land would immediately be suitable to sustain crops. This is not the case, the land will need treatment to ensure it can revert to growing crops and can a take a number of years before these measures becomes effective. Green Hill Solar Farm do not address how these treatment works will be undertaken. Nor do they provide details on how they will support the landowners during this transition period. According to the 'Farmer's Weekly' "Essentially, it means it is not possible to plough, cultivate, drain, reseed or use fertilisers or soil improvers on land that has not been touched in the past 15 years without first applying for permission." A licence would be required from Natural England to revert back to agricultural use. The landowners will also lose 'grandfather' rights for farming subsidies that will necessitate fresh applications, without guarantee of success. Green Hill Solar Farm	Soil mitigation strategy, approach and measures during decommissioning stage have been prepared, committed and included in **GH7.6 Outline Soil Management Plan [APP-550]**. Soil profiles of the generally limited areas where the soil profile will have been disturbed (for example, the tracks, fixed infrastructure etc as set out in table 3 of the Farming Report **[APP-571]**, and which involve a total of 23.8ha of which 11.3ha is BMV), will be reinstated in accordance with a detailed Soil Management Plan, which will be developed pre-decommissioning to ensure that soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil condition and undertake any further remediation that may be required. For the great majority of the Order Limits the soil profile will not have been disturbed. The land will not require treatment before it can be used for growing crops. The land will likely be able to grow crops immediately. Farmers have, for centuries, incorporated grass leys into their cropping cycles and crops

			should be subsidising the landowners for this time-period, after the 60 years term has elapsed, when the landowners could be denied/ delayed licences and subsidies to resume agricultural use.	benefit from the improvements to the soil from that process. As noted above at LDC-012, the Land Use Framework recognises that there are opportunities to continue farming alongside solar generation, including through continued livestock grazing and agrivoltaics. The regulatory framework at the point of decommissioning is not known, however the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites. As decommissioning will take place after approximately 60 years, the soils and land conditions on site may have changed significantly by that time due to changes in the climate. It would therefore be more appropriate to prepare a detailed Soil Management Plan closer to the decommissioning stage. This plan should be developed using the mitigation strategy, approach, and measures outlined in **GH7.6 Outline Soil Management Plan [App-550]**, allowing the mitigation to be tailored to the actual site conditions at that time

ODS-007	Agriculture and Soils	Decommissioning Statement – Soil Management	**2. Soil health and recovery [Professor Michael Alder's report].** Green Hill Solar Farm make the statement in their 'Outline Decommissioning Statement [Doc Reference: APP/GH7.3].' that the land utilised for the solar farm"…is therefore expected to be of the same or better quality once decommissioned, as it is at present"; [section 2.1.7]. This is an unfounded statement not based on any empirical evidence, whereas the accepted evidence is to the contrary. There are certain key factors that Green Hill Solar Farm overlook in their submission, that are covered by Professor Michael Alder in his 'Soils and Soils Health Under Ground Mounted Solar Panels' [January 2026] briefing notes for UKSA.	The applicant notes the comments. The comment is related to two aspects 1) whether the quality of soils and land will be improved after 60 years; 2) whether soils/land can be reinstated**.** The conversion of land currently under arable use to grassland would be a long-term fallow or low intensity use and will enhance the quality of the soils and land in long term as stated **ES Chapter 20: Agricultural Circumstances [APP-057].** Coming out of tillage, fallow and low intensity use have been proved to be common practice in farming to improve soil health. Soil profiles will be reinstated in accordance with a detailed Soil Management Plan, which will be developed pre-decommissioning to ensure that soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil condition and undertake any further remediation that may be required.
ODS-008	Agriculture and Soils	Ground Compaction	**Ground compaction.** During construction and decommissioning, the former agricultural land will be subject to	A detailed Soil Management Plan will be developed based on Outline **Soil Management Plan [App-550]**

			movement of mechanical equipment that compact the ground under. This results in "…surface compaction causes caps and in the sub-surface a condition called pans". The 'cap' is the hardened crust at the surface that blocks the surface pores and restricts water and air movement within the soil. The loss of air and water within the soil leads to slumping and degradation in soil quality. "Reduced percolation due to compacted subsoils will result in ponding, concentrated flow, channelised in-field erosion, surface water runoff, and deposition of sediment, nutrients and organic matter into adjacent surface waters, causing sedimentation or pollution". ['Best Management Practices: Subsurface compaction' – Canadian research paper} The effects of subsurface 'caps' and 'pans' have according to Professor Michael Alder's paper, the following detrimental effects, on otherwise, viable agricultural land: "Compacted soils: • are less porous. • have higher bulk densities. • are prone to other forms of soil degradation [e.g., higher erosion rates].	to mitigate soil handling activities. These measures include appropriate soil handling protocols and remediation measures, including subsoiling and ripping where required, to address compaction in accordance with established good practice. The **Outline Soil Management Plan [App-550]** has been, and will continue to be, developed in line with best industry practice guidance issued by Defra at the relevant time, as required by Overarching National Policy Statement for energy (EN-1).

			• are at greater risk of prolonged anaerobic [saturated] conditions. In compacted soils, crop roots: • will not readily exploit the rooting zone. • may suffocate. • are at a greater risk of root disease and suffering from nutrient deficiency. Soil compaction increases soil strength, which means plant roots must exert greater force to penetrate the compacted layer. Often the roots are not able to break through compacted layers, leading to crop performance issues". These latter points being pertinent to the condition of the ground following decommissioning. None of these scenarios have been considered by Green Hill Solar Farm in their submissions.	
ODS-009	Agriculture and Soils	Soil Compaction	**Depths/ layers of compaction.** Sub-surface compaction also occurs deeper within the soil structure and can create plough 'pans' which are compacted layers that hinder root growth and the absorption of nutrients to maintain healthy soils. These compacted layers are often below the effective ploughing depth of agricultural machinery. Within Section 2.1.8 of the 'Outline Decommissioning Statement', Green Hill	Please refer to 'ODS-008' on the implementation of measures to mitigate compaction.

			Solar Farm, only refer to ploughing as a remediation measure to provide aeration to the soils. Whilst this may address the upper part of the surface crust, or 'cap', ploughing is only effective to the top 300mm of soil, this does not address how they will mitigate the underlying 'pan' of compacted soils. As noted above this layer will be less porous than its original condition and will lead to soil degradation, by soil erosion of the overlying ground.	
ODS-010	Ecology and Biodiversity	Effects on Biodiversity	**Effects on biodiversity.** In a paper entitled 'Solar Panels on Farmland and Their Impact on Soil Diversity' [Hackett 2024] it states that solar panels can have a significant impact on biodiversity and states that soil carbon levels determine the lands biodiversity value. This research states that plant cover and ground biomass was significantly lower under solar panels. Soil carbon was 9% lower and particulate organic matter 29% lower, it therefore follows that there will be a reduced biodiversity, which is contrary to the impression that Green Hill Solar Farm are trying to portray.	The Applicant would clarify that the figures quoted with regards to soil carbon and particulate organic matter originated from Carvalho *et al.* (2025) (full reference provided below). These figures compare the soil carbon and particulate organic matter levels under panels, relative to levels in the gaps between rows of solar panels. The quoted figures do not compare soil carbon levels of a site before and after solar panels are installed. The Carvalho *et al.* (2025) study also compared soil properties underneath and between panel rows relative to a pasture control site (Figure 3 in the paper refers). No significant difference in soil organic carbon levels between these two

				areas in the panel arrays and the pasture control site were recorded. It is acknowledged that soil carbon provides a vital role in soil ecosystems and is an indicator for soil health. However, an areas value for biodiversity is determined by a variety of factors, including habitat heterogeneity, floristic diversity, and long-term management practices. The claim that solar farms inevitably lead to reduced biodiversity is not supported by the Hackett (2025) article. While the article notes factors which may be detrimental to soils such as altered water dynamics and shading effects, it also lists several potentially beneficial factors on biodiversity and soil health, such as the creation of a diverse range of microclimates which may support the establishment of a range of diverse floral and faunal communities, as well as reduced soil disturbance relative to arable land management and the reduction in soil inputs, such as fertilisers. The article concludes that 'by understanding these impacts and

				implementing thoughtful management practices it should be possible to balance the benefits of solar energy with the preservation and possible enhancement of soil and other native ecosystems.'. The Applicant does not agree that the Scheme would result in a reduction in biodiversity value. As per Requirement 9 of the **Draft Development Consent Order [EX7/GH3.1_F]**, the Scheme is committed to providing a minimum 47% net gain in habitat units, as well as a minimum 10% net gain in hedgerow and watercourse units. Reference: Carvalho, F. *et al.* (2025) Plant and soil responses to ground-mounted solar panels in temperate agricultural systems. *Environmental Research Letters,* **20**, 024003.
ODS-011	Ecology and Biodiversity Agriculture and Soils	Soil health	**Loss of microbial activity in compacted ground** Chinese research [Professor Cui LI: 2023] states that the shading by solar panels [4.5m high panels are proposed by Green Hill Solar Farm] has an obvious ecological effect	Please refer to ODS-008 on the implementation of measures to mitigate compaction. With regard to shading, it is unclear what conditions, design parameters, and climatic context the research is based on. The shading will also reduce soil temperatures during the

			on soils and this effect may extend to the reduction/ loss of soil microbial activities	summer and subsequently limit soil moisture evaporation. As stated in ODS-007, the benefits of converting land currently under arable use to grassland beneath solar panels outweigh the associated impacts. Please refer to the Applicants response to NE-014 in the **Applicant's Responses to Relevant Representations [REP1-161]** in regard to impacts associated with shading. Please refer to the Applicant's response to ODS-010 above for further details regarding the effects of solar panels on soil health and biodiversity, and ODS-014 for details regarding how panel shading has been accounted for in the Biodiversity Net Gain assessment.
ODS-012	Agriculture and Soils	Soil Health	**Degradation of soil fertility and Italian Governments approach to solar farms.** An Italian study considered soil property change after just seven years of ground mounted solar panels. The conclusion was that soil fertility had degraded, with a significant reduction of water holding capacity under the panels. This study also showed that soil organic matter had dramatically reduced under the panels with a parallel decrease in microbial activity.	The Applicant has noted the comment; however, further detail is required as no reference to the report was provided. It is not clear what conditions or design parameters the study relates to, and it should be noted that the research was conducted under a different climate, which may limit its applicability to this case.

			In recent years [2024], the Italian Government has halted any further solar farm developments on agricultural land; the main reason is to ensure the preservation of agricultural land, to ensure future security of food production. The Italian Government representative stated the measure was to "…put an end to the wild installation of ground-mounted photovoltaics…" The Government are confident that they will achieve their 'netzero' target by developing 'brown field' sites, motorway strips and rooftop developments.	
ODS-013	Hydrology and Flood Risk	Surface Water Run-off	**Greater surface water run-off.** A consequence of the 'cap' effect referenced above is the greater surface water run-off from the compacted ground. This leads to flooding and the loss of soil and the gradual degradation of the ground over the sixty years of the solar farm, with discharge of surface water run-offs and sediments into watercourses.	The Applicant does not agree that the Scheme would lead to greater surface water run-off, flooding or the progressive loss of soil to watercourses over the operational life of the Scheme. The point raised assumes that the operational condition of the Site would be one of persistent bare, compacted ground. That is not the case. As set out in response to **ODS-008**, soil handling during construction and decommissioning will be controlled through the **Outline Soil Management Plan [APP-550]**, with detailed measures secured at the appropriate stage. These measures include appropriate soil handling protocols and

				remediation measures, including subsoiling and ripping where required, to address compaction in accordance with established good practice. It is also relevant that the existing baseline is largely agricultural land subject to cultivation, crop removal, seasonal stripping of vegetation cover and trafficking by farm machinery, all of which can create periods where infiltration is reduced, and runoff risk is elevated. Under the Scheme, solar panels would be mounted on piles and the ground beneath and between the panels would remain undeveloped and permeable. The operational land management approach would retain and manage vegetative cover across the Site, rather than maintaining extensive areas of bare ground. In hydrological terms, that is not a land use change which gives rise to increased runoff as alleged. The hydrology and flood risk assessment in **ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-009]** does not identify an increase in runoff rates or volumes leaving the Site. On that basis, the Scheme

				would not lead to increased flooding, erosion or sediment transport to watercourses as suggested.
ODS-014	Ecology and Biodiversity	Effects on Biodiversity	**Reduction in plant biomass and diversity.** Studies undertaken by [Professor Armstrong et-al] has shown that plant biomass and species diversity was lower under PV arrays. Photosynthesis and net ecosystem exchange was also lower due the shading effect of the panels.	The Applicant would clarify that the statements made appear to be based on Armstrong *et al.* (2016) (full reference provided below). The Applicant acknowledges the findings of this paper. The Applicant's ecologists have undertaken ecological monitoring of over 100 operational solar farm sites, and typically areas directly beneath panels are found to be less botanically diverse than areas elsewhere within the solar site, such as the gaps between rows of panels, and the marginal areas around the panel arrays, both within and outside of the array security fencing. This lower botanical diversity directly under panels has been accounted for in the Biodiversity Net Gain assessment provided in **Environmental Statement Appendix 9.13 Biodiversity Net Gain Assessment (Revision A) [REP1-044]**. Paragraph 1.7.21 states: *'Areas of grassland within panel arrays, comprising areas both directly under panels and between*

				panel rows, have been assigned as Modified Grassland in Poor condition, owing to the potential impact of shading from the panels and the generally lower species diversity observed within panel arrays during operational phase ecological monitoring of solar sites.' However, it is important to note that areas directly underneath panels will only comprise a small proportion of the total land within the Order Limits. Within fields where solar panels are proposed, less than 50% of the area would typically be directly under panels (Blaydes *et al.* 2025 – Figure 3 refers), with the remaining area being within gaps between rows or in the marginal areas between panels and the perimeter security fencing. These areas are less likely to be subject to shading effects from panels, and therefore more diverse and ecologically valuable grassland habitats can establish in these areas. Areas within ecological buffer zones (such as areas within 15m of a retained hedgerow, outside of the array security fencing) will also be targeted to support habitats of higher ecological value. In addition, several fields within the Green Hill Solar Farm scheme are proposed solely

				for ecological mitigation, to support a range of species, including ground nesting and overwintering birds. Given the habitat creation and management measures provided in the **Outline Landscape and Ecological Management Plan (Revision E) [REP6-047]**, as well as the generally low ecological value of the sites at baseline (owing to the majority of the sites currently being intensively managed arable fields), it is considered that the Scheme would deliver a significant net gain for biodiversity. References: Armstrong, A., Ostle, N. J. & Whitaker, J. (2016) Solar park microclimate and vegetation management effects on grassland carbon cycling. *Environmental Research Letters*, **11**, 074016. Blaydes, H., Whyatt, J. D., Carvalho, F., Lee, H. K., McCann, K., Silveira, J. M & Armstrong, A. (2025) Shedding light on land use change for solar farms. *Progress in Energy*, **7**, 033001.

ODS-015	Agriculture and Soils	Soil and land quality	**3. Government of Wales' report: 'The Impact of Solar Photovoltaic [PV] Sites on Agricultural Soils and Land Quality [Date: March 2023]'** A report commissioned for the Government of Wales; 'The Impact of Solar Photovoltaic [PV] Sites on Agricultural Soils and Land Quality [Date: March 2023]',states that it can take years for soils to recover from compaction, and the compaction may be permanent. In one study which involved thirty-two solar farms in England and Wales [Carvolla: 2024] it was found that compaction was 15% higher under solar panels. Within the Government of Wales' report are a number of troubling conclusions regards solar farm developments, namely:	The applicant notes the comments. In regard to the report mentioned, it is unclear how soils were managed during soil handling activities. As stated in ODS-015, A detailed Soil Management Plan will be developed based on **Outline Soil Management Plan [App-550]** to mitigate soil handling activities. These measures include appropriate soil handling protocols and remediation measures, including subsoiling and ripping where required, to address compaction in accordance with established good practice. The **Outline Soil Management Plan [App-550]** have been, and will continue to be, developed in line with best industry practice guidance issued by Defra at the relevant time, as required by Overarching National Policy Statement for energy (EN-1).
ODS-016	Agriculture and Soils	Soil Compaction	**Permanent ground compaction.** Recovery of the land: "It can take many years for soils to recover from compaction and compaction may be permanent. Runoff from panels can result in rivulets, which can lead to soil loss by erosion". This will ensure that the land will not achieve its previous	Please refer to **ODS-008** in respect of soil compaction and its management. Soil handling during construction and decommissioning will be controlled through the **Outline Soil Management Plan [APP-550]**, including the use of appropriate plant, soil handling

			'Best and Most Versatile' [BMV] categorisation.	techniques and remediation measures such as subsoiling and ripping to address both surface and sub-surface compaction, in accordance with established good practice. In respect of the statement that runoff from panels can result in rivulets leading to soil loss by erosion, this describes a localised process associated with panel drip lines; however, whether this results in erosion is dependent on ground condition and management rather than the presence of panels themselves. Solar PV panels drain to ground rather than acting as connected impermeable surfaces, and do not inherently increase runoff or erosion risk where appropriate ground conditions are maintained. The Scheme specifically mitigates this pathway through the establishment and maintenance of continuous grassland cover beneath and between panel rows, avoiding bare soil conditions and increasing surface roughness. This reduces flow velocity, promotes infiltration and prevents the formation of connected preferential flow paths capable of causing erosion.

				Evidence shows that erosion risk is primarily associated with bare or compacted ground conditions, which are not representative of the operational condition of the Site. In addition, construction phase controls and post-construction remediation measures target the compaction pathway, ensuring that infiltration capacity is maintained. The operational land use also removes regular trafficking by heavy agricultural machinery, which is a primary driver of compaction and associated runoff under the existing baseline. On that basis, while localised redistribution of rainfall beneath panel drip lines may occur, the Scheme includes secured and embedded mitigation which prevents this from resulting in soil erosion or sediment transport to watercourses.
ODS-017	Agriculture and Soils	Best and Most Versatile Land	**Solar farm industry targeting best agricultural land.** The report was commissioned as solar farm developers are actively targeting the Category Class 1 to 3a, of the BMV agricultural lands, with 66% of proposed developments built on our best agricultural lands. Whereas in the early years of these	Please refer to the response to LDC-005 above in regard to the site selection process.

			schemes, they were developed on brownfield sites and poorer quality agricultural land.	
ODS-018	Agriculture and Soils	Soil Health	**Solar Farm UK.** Solar Energy UK advocates on behalf of the solar farm industry, have produced a best practice guidance for the industry, but it fails to address the impact these developments have on the health and integrity of the soils and agricultural land. Nor do they provide recommendations to the industry on how remediation should be approached at decommissioning stage.	The Applicant notes this comment. The Applicant addresses this in **ES Chapter 20: Agricultural Circumstances [APP-057]** - 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. In addition, a detailed Soil Management Plan will be developed based on **Outline Soil Management Plan [App-550]** to mitigate soil handling activities.
ODS-019	Hydrology and Flood Risk	Surface Water Run-off	**Water run-off from panels.** Rain run-off from panels: there is likely to be instances of run-off from the solar panels that will result in the compaction of soils at the base of the panels [Professor Choi, et al, 2020]. Over time, rivulets can form along the trailing edge of the panels with potential risk of soil erosion creating rills and gullies across the site.	The Applicant refers to its response to **ODS-008** and **ODS-016** in respect of soil compaction, runoff behaviour and embedded mitigation. As set out therein, while localised runoff at panel drip lines can occur, the potential for this to result in soil erosion (including rilling or gullying) is dependent on ground condition rather than the presence of panels themselves. The Scheme includes secured measures through the

				Outline Soil Management Plan [APP-550], **Outline CEMP [EX7/GH7.1_D]** and **Outline LEMP [REP6-047]** to control soil compaction, establish and maintain continuous vegetative cover, and avoid bare ground conditions. These measures maintain infiltration capacity, increase surface roughness and prevent the formation of connected preferential flow paths. On that basis, the risk of erosion arising from panel runoff is appropriately mitigated and not expected to result in adverse effects.
ODS-020	Agriculture and Soils	Soil Compaction	**Ground consolidation via mechanical plant.** Soil compaction: the main cause of compaction is the compressive forces applied to the soil from the wheels or tracks of mechanical equipment. Hakansson [1985] found that an axle load of 10 tonnes increased soil bulk density to a depth of 500mm. This situation is also referenced above in the 'cap' and 'pan' affect within compacted soils. "Where there is 'industrial compaction' … [large industrial plant; excavators, etc.]… the depth of compaction can extend to depths of 1m [Spoor, 2006] and may persist for up to 30 years [Batey, 2009]".	A detailed Soil Management Plan will be developed based on **Outline Soil Management Plan [App-550]** to mitigate soil handling activities including compaction. Please also refer to ODS-008.

			"The impact of soil compaction is well documented [Batey, 2009] and crop growth, yield and quality is adversely affected. There are also wider environmental implications relating to water and air quality". With Green Hill Solar Farm only considering ploughing as remediation measure of the top 300mm of soil, this will leave compacted ground at lower levels that will result in soil displacement and surface water run-offs, as detailed in Professor Michael Alder's report and confirmed in the report commissioned by the Government of Wales.	
ODS-021	Agriculture and Soils	Soil Compaction	**Impact of ground compaction.** Field studies commissioned by the Welsh Government: found extensive evidence of soil compaction including evidence of waterlogging on the surface or in subsurface horizons, an increase in soil strength or bulk density, low visible porosity, poor structural conditions, soil colour and rooting pattern [Batey, 2009]. Over the course of the sixty years life of this development, according to the above-cited report by Prof, Michael Alder and corroborated by others, and despite Green Hill Solar Farm's claims [Section 2.1.6] the land will not be in a "better quality once decommissioned, as it is at present." It is more likely that the land will never recover to	A detailed Soil Management Plan will be developed based on the **Outline Soil Management Plan [REP6-053]** to mitigate soil handling activities including compaction. Please also refer to ODS-008 above. It is not clear what the major causes of soil compaction is in these field studies and whether a Soil Management Plan was in place and mitigation measures were fully implemented. Construction activities would cause some extent of soil compaction, but this can be avoided / reduced thorough mitigation measures such as working during dry and friable soil condition, topsoil stripping,

			pre-development classification under the BMV criteria.	restricting vehicle movements to designated haul routes and working areas, soil plasticity testing and soil ripping etc, which will be further developed in a detailed Soil Management Plan as stated in **Outline Soil Management Plan [REP6-053]** and secured by Requirement 19, secured in Schedule 2 of the **draft DCO Revision F [EX7/GH3.1_F]**.
ODS-022	Agriculture and Soils	Best and Most Versatile Land	**Downgrading of land from BMV status.** Soil droughtiness: where land has not been fully remediated this causes "…the introduction of unremediated soil compaction. This could reduce the crop available water of the soil profile, changing the ALC grade in the soil droughtiness assessment and may result in downgrading and /or loss of BMV" and "…leading to changes in the available water holding capacity in the subsoil." As Green Hill Solar Farm do not appear to be offering the proper remediation measures to restore the land, this will cause the likely permanent downgrading of the land under BMV. This will permanently affect the crop yield.	Please refer to ODS-008 on compaction. Coupled with soil mitigation measures, 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 and therefore improve the quality of soils and land as stated in **ES Chapter 20: Agricultural Circumstances [APP-057].**
ODS-023	Agriculture and Soils Ground Conditions	Soil contamination	**4. Cables remaining in the ground following decommissioning.**	Please refer to the response to 'LDC-008' above in regard to decommissioning of cables.

			The following statement is extracted from Bedford Borough Council's letter to Green Hill Solar Farm dated 18 December 2024: 'It is noted that the Authority is not supportive of leaving underground ducting and cables in-situ at the Decommissioning Phase. The ducting and cables contain plastics and metals, which are toxic, and with gradual breakdown have the potential to leach into the surrounding ground and groundwater causing contamination. The Promotor should be obligated to return the Site, Cable Corridor, and possible servitudes within the Public Highways used by the proposed Development, free of such known contamination. It is noted that this approach would be supported by the Town and Country Planning [Environmental Impact Assessment] Regulations 2017 regarding long-term harm'. The cabling proposed by Green Hill Solar Farm vary up to 400kV and are therefore classed as high voltage. These cables generally have three copper cores with oil-filled ducts, contained by the outer sheathing. Depending on the soil type, generally high voltage cables will last about 50 years in the ground before degrading.	
ODS-024	Agriculture and Soils	Soil contamination	From my own experience of remediating sites, I have come across many instances of finding degraded and obsolete high voltage cables that are left within the ground. These	The underground cables will employ high-quality, durable sheathing and insulation materials to protect the cables from physical damage,

	Ground Conditions		have contaminated the surrounding ground which was certified and removed to a licensed tip as 'controlled' waste, as defined in the 'Environmental Protection Act: 1990' and the 'Controlled Waste Regulations: 2012'. High levels of copper within the ground due to degraded cables, results in reduced seed germination, stunted growth and reduced ability of crops to utilise photosynthesis for growth. The presence of copper within the ground also compromises biodiversity and enzyme activity leading to reduced soil fertility, which in turn, affects crop yields.	moisture, and corrosion, ensuring they can withstand harsh underground conditions. This is secured within the **Outline Operational Environmental Management Plan [REP6-043]**. The Applicant has committed to either leaving cables in situ or removing the cables, depending on which method is considered to have the least environmental impact at the time as outlined in **ES Chapter 4: Scheme Description [REP6-011]** and the **Outline Decommissioning Statement [REP6-045]**.
ODS-025	Agriculture and Soils Ground Conditions	Soil contamination	Green Hill Solar Farm state within Section 2.1.3 of their document that leaving the cables in-situ has the least impact on the environment, as it avoids the disturbance of the overlying ground. However, they have not considered the impact of the breakdown and degradation of the cables in the long-term and the detrimental impact on the crop bearing capability of the existing soils. Green Hill Solar Farm have suggested they can withdraw the cables by excavating access pits and withdrawing the cable from these extraction points, without the need to expose the entire length of cable for removal. It must be insisted that Green Hill Solar Farm undertake these works as part of any decommissioning and return the land to	The Applicant has committed to either leaving cables in situ or removing the cables, depending on which method is considered to have the least environmental impact at the time as outlined in **ES Chapter 4: Scheme Description [REP6-011]** and the **Outline Decommissioning Statement [REP6-045]**.

			its previous condition, prior to the development.	
ODS-026	Agriculture and Soils Ground Conditions	Soil contamination	**5. Galvanised steel . piles** These are generally 'H' section galvanised steel beams and/ or helical rods that are driven into the ground, up to 2.0m deep, to provide structural support for the solar panels above. These steel sections are generally protected by 'hot dipped' zinc galvanised coating. This zinc coating acts as a sacrificial coating that will corrode before the steel section is affected. Depending on the nature of the ground it is anticipate that the zinc could last anywhere between 20 to 50 years; i.e. less than the projected 60 years term of the contract. Plants need a small amount of zinc to aid growth [typically 30–100 mg/kg], but where the galvanised zinc coating has broken down, through corrosion, it is anticipated that levels will exceed safe levels [300–700 mg/kg]. In plants and leaves, it triggers toxicity symptoms like stunted growth and yellowing [chlorosis]. With thousands of these piles per hectare this will leave many 'hot spots' of zinc contamination in the ground, that is likely to migrate through rain/ groundwater. High levels of zinc can harm soil health by killing beneficial microorganisms and earthworms, which disrupts natural nutrient	The exact coating of the piles will be determined at the detailed design stage. Ground investigation surveys will be undertaken to determine factors such as soil resistivity and pH which will be used to inform the selection of pile coating required for the 60 year operational period. Potential zinc contamination would largely depend on management practices during the operational phase. The Scheme includes solar panel maintenance and management, to be implemented within the Operational Environmental Management Plan. The Applicant has identified the quotes provided in the comment as being from 'The impact of solar photovoltaic (PV) sites on agricultural soils and land' published in March 2023 prepared by ADAS for the Welsh Government. However, this report does not support the conclusions made in the comment, as it reports 'The impact on soil and land from the zinc coating is unknown. Defra's code for using sewage sludge (Defra,2018) gives thresholds for zinc in soils of

			cycling. From the Welsh Government's research paper… "Research on agricultural land has shown that zinc in soils diminishes biological activity [Moffett et al, 2003]". Northamptonshire's soil chemistry is typically dominated by heavy, poorly draining clay loams, often slightly acidic to non-calcareous in the topsoil, with calcareous, iron-rich [ferruginous]subsoils derived from Jurassic ironstones. The slightly acidic soils will aid the breakdown of the zinc coating to the piles. Green Hill Solar Farm have acknowledged that the remnants of the steel piles will be removed, but the act of extraction will lead to the mixture of different layers of soils, lowering the classification of the land under the BMV classification system.	200 – 300mg/kg; these levels are very unlikely to be achieved from the presence of piles in the soil, although the base level of zinc could influence the threshold.' Therefore, zinc levels are likely to much lower than suggested and the report quoted does not conclude that piles will cause 'hot spots' of zinc contamination. The removal of the piles on decommissioning will be a reverse of the installation process, as described in the **Farming Report** section 5.16 to 5.32 **[APP-571].** The piles will be removed in suitable conditions in line with the detailed soil management plan; the removal will not result in any significant mixing of soils and there will be no consequent downgrading of the ALC grade. The comment "*Green Hill Solar Farm have acknowledged that the remnants of the steel piles will be removed, but the act of extraction will lead to the mixture of different layers of soils, lowering the classification of the land under the BMV classification system"* is not correct. As stated in **Outline Soil Management Plan [REP6-053],** soil

				is to be stripped according to the thickness of soil horizons and soil types without mixing and soil profiles to be reinstated will be designed to ensure soils /land is restored to previous its condition. Considering decommissioning will take place in approximately 60 years, the soils and land conditions on Site may have changed as a result of rising temperature and more extreme seasonal variations, such as more intense rainfall and longer droughts. It is therefore considered appropriate to prepare a detailed Soil Management Plan closer to the decommissioning stage. This plan should be developed using the mitigation strategy, approach, and measures outlined in **Outline Soil Management Plan [REP6-053]**, allowing the mitigation to be tailored to the actual site conditions at that time. Soil profiles will be reinstated in accordance with a detailed Soil Management Plan, which will be developed pre-decommissioning to ensure that soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil

				condition and undertake any further remediation that may be required.
ODS-027	Decommissioning	Land Reinstatement	**6. Green Hill Solar Farm's 'Outline Decommissioning Statement'.** What is evident from Green Hill Solar Farm's 'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]' is that no consideration has been given to the reinstating the ground back to agricultural use after the sixty years term, which has degraded in quality over that time period. Green Hill Solar Farm have not produced a 'Environmental Impact Assessment' that looks at the quality of the existing agricultural ground, nor have they made any proposals on how the ground will be reverted back to its original condition. Indeed, there is an argument that such a discussion is not relevant, as many believe that at the point a solar farm is ready for decommissioning the site will be classified as 'brown field' and could be developed in a variety of ways, perhaps for industrial use, or the land reused as a new solar farm. Many believe that a return of the land to agricultural use may be unlikely as the cost for remediation could be astronomical in sixty years hence. At a time when we import the majority of food requirements and the impact of global warming on our foreign sources, we should	The Outline Decommissioning Statement commits to reinstating land under page 20. Agricultural circumstances. *'Land used temporarily will be reinstated where practicable to its pre-construction condition and use (or a condition agreed with the landowner)'.* Soil management measures have been outlined in the **Outline Decommissioning Statement [REP6-045]** and the **Outline Soil Management Plan [REP6-53],** secured by Schedule 2, requirement 19 of the **Draft DCO [EX7/GH3.1_F].** Soil profiles will be reinstated in accordance with a detailed restoration plan to ensure that soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil condition and undertake any further remediation that may be required. The Outline Soil Management Plan is informed by completed soil surveys. The soil baseline

			be protecting our land for future food production. The loss of this viable agricultural land for a potential sixty years period and the risk that it may not be suitable for use after this period is myopic at the very least. The fact that Green Hill Solar Farm have stated that the ground will be no worse, or even a better quality, than existing, is misleading at best. At worst, it ignores the available research.	information along with other soil mitigation measures will guide soil handling activities. To date, soil surveys have been completed across the Sites as outlined within **Appendix 20.1 [APP-172]**. A soil survey will be undertaken by a suitably qualified and experienced soil scientist or practitioner in refined Cable Route Corridor where ALC survey has not been conducted during the Environmental Impact Assessment (EIA). A detailed SMP will be produced before construction based on soil data from the ALC survey at the EIA stage and from any subsequent pre-construction soil surveys of the Cable Route Corridor conducted post consent and pre construction.
ODS-028	Decommissioning	Decommissioning Risk	**7. Risks of insolvency of the Applicant.** According to the Government Office of National Statistics, in the UK, the average life expectancy of a business is eight years. They also state that the likelihood of a business lasting 60 years [for the duration of the contract] is "…quite low." Obviously, with Green Hill Solar Farm and Macquarie Bank, there is no knowing how long they will last as	Please refer to responses to 'SA-006 and SB-004' of the **Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070]** in regard to the requirement for decommissioning. Requirement 21 of Schedule 2 to the **Draft DCO Revision F [EX7/GH3.1_F]** requires the

			a business, but the statistics are not in their favour, particularly in a volatile and fast changing industry such a renewable energy. In recent weeks, Hive Energy went into administration despite a taxpayer backed £60m loan guarantee. Turnover for its latest accounts in the year to end March 2024 was £7.2m, with an operating loss of £29.4m, booked on disposal of other subsidiaries. Hive Energy are currently seeking a buyer, therefore the viability of its previous developments [Cleve Hill in Kent, for instance] is in doubt. Therefore, it leaves the question, unanswered, will any potential buyer take on board the liability for decommissioning of Hive Energy's previous developments. Will the risk of decommissioning an existing installation be borne by the landowner/ taxpayer?	Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. It is noted that the Applicant has entered into voluntary agreements with the landowners where the solar PV panels are located. As part of the lease arrangements, there are measures requiring the Applicant to put in place decommissioning security for the benefit of those landowners. This protects the landowner should decommissioning not take place.
ODS-029	Decommissioning	Decommissioning Risk	According to the UKAEA, "the STEP programme will deliver a UK prototype fusion energy plant, targeting 2040, and a path to commercial viability of fusion". In the event of such a breakthrough, much of the current UK renewable technologies will become obsolete. With companies going into administration, or diversifying out of the industry. Future advances in the renewable energy industry, would result in the existing installations becoming obsolete or financially unviable, in the wake of these new	As outlined in the response to ODS-028 above Requirement 21 of Schedule 2 to the **Draft DCO Revision F [EX7/GH3.1_F]** requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence.

			technologies. There is nothing to prevent the parent group from winding-up Green Hill Solar Farm during, or at the end of the operating period, without completing the obligations to decommission the installations. In law, little can be done to prevent this course of action. In the event of these scenarios, the responsibility will fall on the taxpayer/ landowner to decommission the solar farm/ BESS installations. There should be safeguards in place to mitigate such an outcome. There is also the potential scenario that Green Hill Solar Farm be 'sold-off' to a third party that would not take on board the obligations imposed on the Applicant. In such cases, where does the responsibility of the decommissioning fall? Clear legally binding proposals are required from the Parent Company/ Green Hill Solar Farm before any approvals of the scheme. These must be enforceable at the conclusion of the contract and/ or in the event, that Green Hill Solar Farm ceases to exist as a trading entity. The common business model in the solar farm industry is for an Applicant to get the scheme through the planning process and then to sell-on their interests to an actual Developer. What safeguards are there that the Developer will be bound by the conditions imposed on the Applicant? If	This requirement will apply to the Scheme through the DCO irrespective of any potential future change in management.

			Green Hill Solar Farm follows this business model, their parent company will wind-up the former once the sale and transfer of assets to the Developer have been concluded. To safeguard the taxpayers and landowners, it should be mandatory that Green Hill Solar Farm provide a 'Restoration Bond' and/ or an escrow account whereby monies can be drawn down to fund the decommissioning of the installations in the event that Green Hill Solar Farm cannot/ will not be in a position to undertake the works themselves.	
ODS-030	Decommissioning	Decommissioning Waste	**8. BESS battery cells** From the Applicant's submission, it states that the lithium-ion batteries will need periodic replacement. The battery cells have a short life, varying from eight to thirteen years, which could results in four to five replacements of the batteries during the operational life of the facility. In a fast developing industry, will the existing equipment become obsolete and require major replacement, i.e. batteries changed from lithium-ion to sodium-iron. Will this lead to further construction activities at a future date. The Applicant does not address either of these matters in their submission. There is currently a world shortage of recycling centres for the lithium-ion batteries. Current estimates is that it is three times more costly to re-purpose the constituent	As outlined in the response to 'ODS-028' above Requirement 21 of Schedule 2 to the **Draft DCO Revision F [EX7/GH3.1_F]** requires the Scheme to be decommissioned in accordance with a decommissioning plan to be approved by the relevant planning authorities. The Scheme must then be decommissioned in accordance with the approved plan. Failure to comply with this requirement is a criminal offence. Please refer to 'Q2.1.6' within **[REP3-074]** for battery replacements. Enhanced storage technologies which are compatible with the parameters and requirements of the DCO, if granted, may be considered during the

			part of the cells than it does to produce cells with new raw materials [Briefing Note: Lithium-Ion Battery Energy Storage Systems: January 2025]. With no viable solution to this matter, this is going to lead to redundant cells being disposed of in landfills, with the environmental risks this poses, with contaminants leaching into the ground. Green Hill Solar Farm do not address how the BESS installations will be decommissioned and is not covered in the 'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'. This critical issue must be addressed by the Green Hill Solar Farm before final decision of the scheme, as much of the batteries and associated equipment will be classed as 'controlled waste'.	Scheme's operational phase. Alternatively, if battery module(s) capacity degraded to an unsatisfactory level during its operational phase, a like-for-like replacement, with no additional construction, as described in section 4.6 of Environmental Statement Chapter 4 Scheme Description **[REP6-011**] would return the Scheme's energy storage capacity back to its initial level. The replacement of batteries five times during the lifetime of the Scheme has been assessed as the worst-case scenario, based on current battery lifespans. It is likely that improvements in battery technology will occur during the lifetime of the Scheme. Please refer to ES Chapter 24: Other Environmental Matters **[REP1-027].** Currently, recycling routes for component replacement waste are generally available and it is anticipated that recycling opportunities will increase in the future, driven by the expanding market for solar PV installations.
ODS-031	Hydrology and Flood Risk	Decommissioning Risk	**9. Flooding [during the lifespan of the development and post decommissioning].**	The Applicant refers to its responses to **ODS-008**, **ODS-016** and **ODS-019** in respect of soil compaction,

	Decommissioning		It is stated in preceding sections of this response that compacted ground leads to greater surfaces water run-off. As detailed in the Green Hill Solar Farm's 'Outline Decommissioning Statement' [Section 2.1.8], they do not propose to mitigate this matter, other than undertaking ploughing, as part of the decommissioning. However, ploughing does not address the underlying layers of compacted ground, known as 'pans'. The movement and vibration of mechanical equipment can consolidate ground down to depths of a metre. As detailed in the Welsh Government's sponsored research, this ground compaction leads to soil erosion which impact watercourses, not only during the course of the sixty years lifespan of this development, but also post decommissioning. This can result in sediments being deposited in watercourses and increases in flooding events. There does not seem to be any recognition of the consequences of flooding due to the solar farm development. The Blackmile Lane area of Grendon has been prone to flooding, increasingly in frequency in recent years. Grendon Brook passes through proposed Site F, and is fed by a number of tributaries within the proposed development area.	runoff behaviour and embedded mitigation. The characterisation of decommissioning effects is not accepted. Soil compaction is a recognised and managed pathway within the Scheme and is controlled through secured measures during construction, operation and decommissioning. The **Outline Soil Management Plan [APP-550]** includes measures to prevent, monitor and remediate compaction, including appropriate plant selection, controlled trafficking and remediation techniques such as subsoiling and ripping. These measures address both surface and sub-surface compaction, including the potential formation of deeper compacted layers. In respect of decommissioning, the Outline Decommissioning Strategy does not rely solely on ploughing. Soil restoration will be undertaken in accordance with good practice to reinstate soil structure and permeability, including remediation of any compacted horizons where identified. This ensures that infiltration capacity is restored and that runoff characteristics are

				returned to, or improved from, the baseline agricultural condition. The baseline position is that the Site is currently in agricultural use, where regular trafficking by heavy machinery, seasonal bare ground and tramlines are established contributors to compaction, runoff generation and sediment transport. The operational phase of the Scheme removes these baseline drivers through the establishment of permanent vegetative cover and the absence of routine intensive cultivation. As such, the Scheme represents an improvement over the existing condition in terms of runoff generation and erosion risk. During the operational lifetime, the Scheme includes secured measures through the **Outline CEMP [EX7/GH7.1_D]**, **Outline LEMP** [**REP6-047**] and **Outline Soil Management Plan [REP6-053]** to maintain ground cover, avoid sustained compaction and preserve infiltration capacity. These measures prevent the formation of preferential flow paths and associated erosion mechanisms. In respect of flood risk, the potential for increased runoff leading to

				flooding has been assessed within the **ES Chapter 10: Hydrology, Flood Risk and Drainage [REP6-007]** and the **Flood Risk Assessment and Drainage Strategy [REP5-021]**. The assessment demonstrates that the Scheme will not increase surface water runoff rates or volumes at the site boundary compared to the baseline condition, in accordance with national policy. There is therefore no pathway by which the Scheme would increase flood risk to downstream receptors, including Grendon Brook or the Blackmile Lane area. The assertion that the Scheme would lead to increased sediment deposition within watercourses and associated flooding is not supported. The mechanisms identified are specifically mitigated through secured design and management measures, and the assessment concludes that there would be no significant adverse effects on hydrology, flood risk or watercourses during the operational or decommissioning phases.
ODS-032	Decommissioning	Soil Compaction	In years past, these fields have been ploughed for crops, which opens up the clay	The Applicant notes the comments. However, the Applicant does not

			soil and increases porosity and permeability. However, with the prospect of the solar farm, these fields will become compacted clay as noted above, which leads to greater surface water and sediment discharges into the streams, including Grendon Brook. With passing years, ground consolidation increases, exacerbating this problem. Green Hill Solar Farm's statement that they will only undertake ploughing as part of the decommissioning works does need reinstate the ground's original condition. This will lead to increased risk of flooding to Blackmile Lane, for which Green Hill Solar Farm do not provide any mitigation proposals.	agree. Non-tillage and long-term grassland result in minimal soil disturbance, stable soil structure, improved aggregation and enhanced microporosity via dense grass root systems and biological activity (e.g. earthworms). This is common farming practice. As stated in **ES Chapter 20: Agricultural Circumstances [APP-057],** the conversion of arable land to grassland would be long-term fallow and will remove disturbance on the soils. This 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. Please also refer to ODS-008 and ODS-31 above in regard to potential compaction impacts and increased risk of flooding.
ODS-033	Decommissioning	Soil Compaction	According to research by the 'University of Nottingham', ploughed fields have greater porosity, than non-tilled ground [16%, compared to 12%, an increase of 33%]. The action of ploughing also opens up the pore sizes within the clay soils[0.84mm/m2, compared to 0.49mm/m2, an increase of 71%], which assists absorption. This is clear evidence that there will be greater surface	Please refer to ODS-008 and ODS-31 above in regard to potential compaction impacts and increased risk of flooding. Please refer to the Applicants responses to Grendon Parish (GrPC-003 to GrPC-012) in the **Applicants Response to Deadline 6 Submission [EX7/GH8.1.50]** in

			water discharge, in frequency and intensity into the steams and brooks. Green Hill Solar Farm does not provide evidence as to how their 'low' flood risk categorisation is calculated as it is contrary to the Environmental Agency's own assessment of Grendon Brook. There is no recognition of the impact of the solar farm development on watercourses, due to surface water run-off and the impact of Green Hill Solar Farm's contractor pumping water from the works into the watercourses. The writer has communicated these concerns to Green Hill Solar Farm, for which they have never provided a response.	regard to the flood modelling associated with Grendon Brook.
ODS-034	Decommissioning	Decommissioning Statement	**10. Compliance post consent.** A robust compliance process is required to monitor commitments and assessments made by the applicant. We cannot see how the councils and statutory bodies will be responsible for ensuring all the commitments are carried out to the required standards. We need a clear list of who is responsible for what, and who will be accountable, and a clear pathway for recourse that does not involve expensive legal costs. The Applicant quotes it will be a criminal offence if they do not adhere to their plans however, who will hold them to task in each area and who will be responsible to challenge any offences?	The relevant planning authority is the body responsible for enforcement of any breach of the DCO. This reflects the enforcement role of the planning authority in relation to monitoring and enforcement of planning conditions in relation to planning permissions granted under the Town and Country Planning Act 1990. Part 8 of the Planning Act 2008 provides the relevant planning authority with various powers in relation to the investigation, enforcement and remediation of any breach of a development consent order, and include, where relevant, for the

				recovery of costs from the undertaker.
ODS-035	Decommissioning	Decommissioning Statement	**11. Haul roads and compounds.** Green Hill Solar Farm's 'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]' does not refer to the removal of any site compounds required to facilitate the works. These must be removed, at the time the facility comes on line, with the construction works complete. At the same time, haul roads must be removed, as the traffic during the operation phase of the works will be occasional visits and therefore much of the temporary roads will no longer be required.	The **Outline Decommissioning Statement [REP6-045**] contains mitigation measures that are required for the final decommissioning of the Scheme under Requirement 21 in Schedule 2 to the draft DCO [**EX7/GH3.1_F**]. The removal of temporary construction compounds and construction haul roads following completion of the construction of the Scheme is secured in the **Outline Construction Environmental Management Plan [EX7/GH7.1_D]** through commitments to reinstatement post construction. The **dDCO Revision F [EX7/GH3.1_F]** sets out in Schedule 1, though the description of the works numbers, which elements are temporary for the purposes of construction.
ODS-036	Decommissioning	Recommendations	**12. Conclusions and recommendations.** Within Green Hill Solar Farm's 'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]' they claim erroneously that the agricultural land at the end of the sixty years contact will be in no worse, or even in a better condition, than before the works commenced. They make	Please refer to the Applicant's Response to 'LDC-002'. The Agricultural Land Classification Reports Chapter 20: Agriculture Land Classification **[APP-057]** of the ES were undertaken as part of the Application and will form the basis of how the land will be left at the end of the operational phase. The soil is

			this statement without any evidence, or corroboration. As cited above the likelihood is that the land will likely be permanently compromised by the solar farm and unlikely to regain its previous BMV categorisation. In the long term, this will reduce the area of land that is capable of sustaining agricultural crops, when foreign food sources become increasingly comprised through global warming. The Italian Government has recognised that it cannot keep losing viable agricultural land to solar farm developments, if left un-checked, the industry target the BMV land. For this reason, the solar farms industry are banned from developing schemes on agricultural land. Yet despite this, the Italian Government is confident that it will still meet its renewable energy generation targets.	anticipated to have undergone up to 60 years of recovery given that while the Scheme is operational, the land will be used for lower intensity farming practices, such as for sheep grazing or being left fallow. It is therefore expected to be of the same or better quality once decommissioned, as it is at present. Where localised soil compaction occurs from the presence of structures such as the substations or the BESS; or the weight of mobile machinery used through construction, operation and decommissioning, management measures are identified to alleviate compaction (e.g., through ploughing and aeration), to maintain soil structure and enable reinstatement of the land to its original use, which is secured through the **Soil Management Plan [REP6-053]**.
ODS-037	Decommissioning	Decommissioning Statement	This development must be denied consent for the following reasons, pertaining to their inadequate proposals for the decommissioning of the works: a) Green Hill Solar Farm does not recognise the extent of the remediation works required to reinstate the land to its former use,	The Applicant notes this comment. Please refer to responses to ODS-001 to ODS-036 above.

			following the sixty years contract. Nor do they put forward any measures other than ploughing the land. b) Green Hill Solar Farm does not recognise, nor make proposals, for the any corrective measures for the improvement of the land to sustain future crops; i.e. reinstating its capability to absorb oxygen, or water, or replacing its lost nutrients and to increase the effectiveness of its biomass, that will help it sustain the growth of agricultural crops. c) Green Hill Solar Farm anticipate that the decommissioning works will take 1 – 2 years to complete. This may be adequate for the removal of the existing installations. However, this does not include time for the remediation of the land, in order for it to sustain growth of crops. This can take a number of years to achieve. d) Remediation of the land can take a number of years to achieve, yet Green Hill Solar Farm only believes a cursory ploughing is adequate. Green Hill Solar Farm should be providing a programme of works for the remediation, and the support they will offer to the farmers to achieve this objective, over a potential 7-10 years period, following decommissioning. e) As contained in the Government of Wales report there is a consensus that the land is	

			unlikely to attain its previous ability of sustaining agricultural crops. Will Green Hill Solar Farm compensate the landowners, for future loss of income? f) Green Hill Solar Farm do not propose any safeguards for the decommissioning of the installations, in the event that they cease trading on, or before, the commencement of the decommissioning works. There should be a 'Restoration Bond' and/ or escrow account in place, that the landowner can draw on, it the event that Green Hill Solar Farm, cannot/ will not, undertake these works. g) Green Hill Solar Farm do not make any proposals on preventative measures to control surface water run-offs into watercourses that are increasingly prone to flooding. There is no proposals on how they will prevent sediments migrating into the watercourses. The compacted ground will diminish the land's ability to absorb rainfall. This will lead to ponding/ flooding of the land and result in discharge of surface water and sediments into the watercourses.	

2.5 ISEP advice note Solar PV on Agricultural Land compared to Green Hill Solar DCO

Table 2.5: [REP6-096]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
ALC-001	Agriculture and Soils	Solar PV on ALC	The ISEP (Institute of Sustainability and Environmental Professionals) have published an advice note Solar PV on Agricultural Land in response to current inconsistencies in EIAs and Strategic Environmental Assessments (SEAs) for large-scale solar photovoltaic (PV) projects on agricultural land, of a sufficient size to be NSIPs. Inconsistencies in Environmental Impact Assessments for large-scale solar power projects on UK farmland has compelled The Institute of Sustainability and Environmental Professionals (ISEP) to issue new advice to protect agricultural land and biodiversity, while balancing the growing demand for renewable energy. Their conclusion was…. The "best and most versatile" farmland should be protected amid rapid expansion of UK solar power.	The Applicant note the comment and ISEP new publication. The Applicant has assessed the effects on agricultural land and soils in accordance with IEMA guidance on land and soils (former ISEP) and in compliance with NPPF and NPs En-1 and EN-5 as outlined in Section 20.3 of **ES Chapter 20: Agricultural Circumstances [APP-057]**.
ALC-002	Agriculture and Soils	Solar PV on ALC	When comparing the ISEP advice guidance with the DCO submission from IGP for Green Hill Solar, there are several areas of inconsistency/non-compliance, SGHS have highlighted, which the ExA may wish to consider in relation to the IGP application for a DCO.	The Applicant notes this comment.
ALC-003	Agriculture and Soils	Solar PV on ALC	ISEP - Panels could be damaged during installation, operation or decommissioning and it should be demonstrated in the EIA that this been	The installation of panels will be undertaken in accordance with standard construction practices, with appropriate measures in place to prevent and avoid damage secured within

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			considered as a potential introduced source of pollution and proposals made for remediation. Case Study "Recent events at Porth Wen on Anglesey, when solar panels were destroyed by strong winds, have shown that significant contamination by broken glass and chemical pollution can arise because of exceptional weather events that may be on the increase." ADAS, The impact of solar photovoltaic (PV) sites on agricultural soils and land 2025. DCO - The ES acknowledges that damaged solar panels would be removed and disposed of, but does not consider the increased risk of contamination from panel breakage during flood events. The Green Hill Solar Site F experiences regular flooding, and the soil compaction and solar arrays will only increase the risk of increased flooding downstream. This flood water flows into local ditches and brooks and ultimately the River Nene/RAMSAR/SSSi. Floodwaters passing between panel arrays and at panel edges, could mobilise broken glass, or metals into soil and watercourses. The risk of contamination under these conditions has not been assessed, and no monitoring or mitigation therefore proposed. (despite the recent Porth Wen example). This represents a significant unquantified environmental risk, particularly given the presence of Best and Most Versatile agricultural land and the proximity to sensitive watercourses.	the Construction Environmental Management Plan **[EX7/GH7.1_D]**. Storm Darragh caused damage to the Porth Wen site in December 2024, the Met Office issued a red warning (the most severe category of UK weather warning) for wind covering West Wales and both coasts of the Bristol Channel, with winds gusting at 60 to 70Kt (69 to 81mph) or higher in these areas. Red warnings are categorised to be danger to life, they signify rare but extreme weather events. Green Hill Solar Farm will comply with EN 1991-1-4 (Eurocode 1, Part 1-4) of the English/British standard BS EN 1991-1-4:2005 + UK National Annex (NA to BS EN 1991-1-4:2005) which factors in site specific parameters such as wind speed, topography, structural height, and pressure coefficients into final wind loading calculations which will be undertaken at the detailed design stage to ensure structural resilience to extreme storm conditions. The Applicant does not agree that panel breakage during flood events gives rise to a significant or unassessed contamination pathway. As set out in **ES Volume 1, Chapter 10: Hydrology, Flood Risk and Drainage [REP6-009]** and **Appendix 10.9: Flood Risk**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				Assessment and Drainage Strategy – Green Hill F [APP-097], the majority of Green Hill F is located within Flood Zone 1 and is not expected to flood. Where Flood Zones 2 and 3 are present, these are limited to peripheral areas associated with Grendon Brook and its tributaries, and predominantly occur in locations where no infrastructure is proposed or where impacts are minimal. The site-specific assessment confirms that any interaction between floodwater and the proposed development is limited, with flood depths generally not expected to exceed approximately 0.3m. Solar panels are mounted on frames and raised above ground level, allowing floodwater to pass beneath them rather than exerting direct damaging forces. The potential for panels to be impacted by flooding, and therefore damaged, is consequently low. In addition, the assessment demonstrates that the Scheme results in a de minimis impact on floodplain storage (approximately 8m³ across the entire Site), with no perceptible change in flood levels or flow routes. There is therefore no mechanism by which the Scheme would increase flood velocities or create conditions capable of mobilising debris. On that basis, the scenario described, whereby floodwaters mobilise broken panel

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				components into soils or watercourses, is not considered a credible pathway. In the unlikely event that damage did occur, panels would be identified through routine inspection and maintenance and removed from site for appropriate disposal, preventing any accumulation of material available for mobilisation. In addition, it is noted that typical solar panels contain relatively small quantities of potential contaminants of concern in a form that would not lend itself to leaching as a result of floodwater damage. Accordingly, the risk of contamination arising from flood-damaged panels is negligible and does not alter the conclusions of the existing assessment.
ALC-004	Agriculture and Soils	Solar PV on ALC	ISEP - Lack of clarity as to how the condition of the land will be assessed after decommissioning and its suitability for farming. DCO - The Outline Soil Management plan states there will need to be a detailed SMP at the decommissioning phase i.e. AFTER DCO consent. This means the impacts will not be considered BEFORE approval, so the ES assumes restoration WITHOUT any evidence. This is contrary to precautionary planning principles.	The applicant notes the comment, measures are included in the **Outline Soil Management Plan [REP6-053].** Please refer to ODS-007 and ODS-008. The Applicant noted the comment '*DCO - The Outline Soil Management plan states there will need to be a detailed SMP at the decommissioning phase i.e. AFTER DCO consent. This means the impacts will not be considered BEFORE approval, so the ES assumes restoration WITHOUT any evidence'*. However, the Applicant does not agree. The potential impact on soils from the Scheme and

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			The OSMP submitted by the Applicant acknowledges that construction and operation of the scheme could affect soils through stripping, storage, compaction and long-term management requirements. This confirms that the applicant acknowledges risks to soil structure and function. It is not sufficiently detailed to demonstrate that Best and Most Versatile land will be protected or restored. This approach conflicts with the National Planning Policy Framework, which requires recognition of the value of BMV land and protection of soil resources, and with Natural England guidance on safeguarding soil structure and function.	major soil mitigation measures have been considered and assessed in ES **Chapter 20: Agricultural Circumstances [APP-057]** and **Outline Soil Management Plan [REP6-053].** The assessment of impact on soils was in accordance with ISEP guidance. The detailed Soil Management Plan will be developed in line with final design, construction plan and construction programme but the **Outline Soil Management Plan [REP6-053]** covers all major soil strategy, mitigation approach and measures.
ALC-005	Agriculture and Soils	Solar PV on ALC	ISEP - Is there a methodology by which the applicant intends to restore affected areas to agricultural use and base line ALC/LCA grade/class on decommissioning? DCO - No methodology provided. The OSMP does acknowledge the need for soil stripping, stockpiling, compaction mitigation and long-term soil management, which demonstrates that the development has potential to harm soil structure and function. However, the plan provides no evidence that soil quality and agricultural classification can be fully restored after decades of solar development, particularly on BMV land.	Please refer to LDC-008, ODS-007 and ODS-008 and **ES Chapter 20: Agricultural Circumstances [APP-057].** The soil mitigation approach and management measures during decommissioning stage are included in **GH7.6 Outline Soil Management Plan [REP6-053]**. Soil profiles will be reinstated in accordance with a detailed Soil Management Plan, which will be developed pre-decommissioning to ensure that soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil condition and undertake any further remediation that may be required.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				As decommissioning will take place after approximately 60 years, the soils and land conditions on site may have changed by that time due to changes in the climate. It is therefore more appropriate to prepare a detailed Soil Management Plan closer to the decommissioning stage to reflect existing conditions on Site. This plan should be developed using the mitigation strategy, approach, and measures outlined in **GH7.6 Outline Soil Management Plan [App-550]**, allowing the mitigation to be tailored to the actual site conditions at that time
ALC-006	Agriculture and Soils	Solar PV on ALC	A report by ADAS, commissioned by the Welsh Government The impact of solar photovoltaic (PV) sites on agricultural soils and land 2023, found: "The main issues influencing reversion to agriculture at decommissioning is all materials are expected to be removed including the removal of piles from the soil. Most standard steel products corrode, particularly in the upper part of the pile and this may adversely affect the ability to extract the piles after 40 years. (Non-corrosive materials could be used but have cost implications). It may be that piles fracture and are difficult to extract without additional digging." DCO - The ES refers to solar panel mounting structures supported by driven steel piles but does not specify the alloy composition or corrosion protection treatments to be used. Without this	Please refer to ODS-026and **ES Chapter 20: Agricultural Circumstances [APP-057].** As noted in ODS-026 the specification of the mounting structure will be chosen at the detailed design stage. As outlined under Table 3.15 of the **Outline Operational Environmental Management Plan [REP6-043]** regular inspections and maintenance of all equipment will be routinely undertaken to identify any signs of potential damage. This ensures early detection and rectification of issues, thereby minimising operational risks. It is considered appropriate to prepare a detailed Soil Management Plan closer to the decommissioning stage. This plan should be developed using the mitigation strategy,

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			information, the assessment of long-term soil contamination risk is incomplete, particularly on Best and Most Versatile agricultural land. The piles may be zinc coated which could cause soil contamination by leaching No monitoring plan is included, so no requirement for soil testing to monitor any metal contamination.	approach, and measures outlined in GH7.6 **Outline Soil Management Plan [App-550]**, allowing the mitigation to be tailored to the actual site conditions at that time. Soil profiles will be reinstated in accordance with a detailed Soil Management Plan, which will be developed pre-decommissioning to ensure that soils and land are returned to their pre-construction condition. Following restoration, a period of soil aftercare will be implemented to monitor soil condition and undertake any further remediation that may be required.
ALC-007	Agriculture and Soils	Solar PV on ALC	ISEP - The most recent EIA guidance for agricultural land and soils is in ISEP's 2022 guidelines A New Perspective on Land and Soil in Environmental Impact Assessment states: 'Consideration of the development impacts on the soil resource and soil function should be made alongside agricultural land-take.' DCO - The ES notes soil structure could be damaged by construction activities and heavy machinery. Compaction changes soil hydrological function, thereby increasing flood risk. However, the assessment concludes impacts are minor without providing evidence that soil structure and fertility can be fully restored after decades of development. Given the high proportion of Best and Most Versatile land affected, this represents a	Please refer to ODS-007 and ODS-008. Please refer to ODS-31 above in regard to potential compaction impacts and increased risk of flooding.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			potentially significant and long-term loss of soil resource and agricultural productivity.	
ALC-008	Agriculture and Soils	Solar PV on ALC	ISEP - Incomplete assessment of the socio-economic impacts of a large-scale solar PV, such as displacement of tenant farmers and redundancy of the agricultural workforce. DCO- SGHS are aware of at least 2 displaced tenant farmers and resultant workers as a result of this proposal. In addition, there are several local businesses that will be negatively impacted as a result of the development, including, but not limited to, farm shops, (e.g. Glebe Farm, Scotch Lodge, Beckworth Emporium), livery businesses (eg John Hope, Top Lodge Farm, Parkhill Livery), riding schools (Manor Farm), Sports and recreation facilities (eg Grendon Sapphires), tourist businesses (Waendel Walk, Castle Ashby,) and many others.	The Applicant is confident that the assessment in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** fully assesses these matters in accordance with guidance from ISEP. The assessment has considered a worst-case loss of 12 FTE agricultural jobs through loss of employment of tenant farmers either wholly or partially displaced by the Scheme, and indirect effects on suppliers and downstream businesses. While the impacts on individual businesses have not been assessed, the assessment in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]**, impacts on tourism and recreation receptors (including Beckworth Emporium, equestrian facilities, sports facilities, and key visitor attractions, locations and events) have been assessed in full in **Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]**. From this, an estimate of worst-case losses to tourism-dependent businesses identifies a loss of up to 29 FTE jobs during construction, reducing to 13 FTE jobs during the Scheme's operation. The Applicant has committed to focussing on local procurement, retention and retraining

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				schemes for workers displaced by the Scheme, as secured through the **OSSCEP [APP-552]** by Requirement 20 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.
ALC-009	Agriculture and Soils	Solar PV on ALC	ISEP - What is the risk of carbon loss or fugitive greenhouse gas emissions during the construction and operational phases of development, relative to other sites assessed? DCO - There were no alternative sites assessed and compared. The ES only considers direct, on-site emissions and provides only a limited assessment of alternative sites.	The ES Climate Change Chapter [**APP-044**] addresses direct and indirect emissions across the Scheme's lifecycle, including embodied carbon in materials, transportation from source to site, and electricity usage amongst others. The majority of emissions considered in the assessment arise from embodied carbon in materials, particularly PV panels and batteries, which occur during manufacturing rather than on-site. These emissions are quantified and assessed as part of the lifecycle approach. The ES does not include an assessment of alternative sites for comparison. As set out in the Site Selection Report [**REP1-037**], no areas of brownfield land capable of supporting the Scheme were identified. The land considered for the Scheme being consistently agricultural in nature, the carbon impacts associated with land use change would be very similar if other agricultural land was used, with other constraints determining the sites selected for the Scheme. The assessment instead focuses on the Green Hill site specifically. Consideration is given within the ES to typical GHG emissions from typical

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				alternative energy generating methods as a point of comparison. Carbon loss has not been specifically assessed as it is anticipated that there would be a beneficial impact from the development due to the conversion of arable land to grassland during operation which is anticipated to increased carbon storage in soil and vegetation. It should be noted that this would reverse following decommissioning when the site is predicted to return to arable land. Arable land reverting to low input grassland typically saves 1.590 tonnes CO_2e/ha/year as evidenced within Natural England's report on Carbon Storage and Sequestration by Habitat 2021 (NERR094)

2.6 Queries Regarding Traffic and Transport

Table 2.6: [REP6-101]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
Please refer to the 'Applicant Response to Stop Green Hill Solar Written Transport Response' **[REP6-074]** where the Applicant has responded in full.				

2.7 Emergency Access to Proposed BESS

Table 2.7: [REP6-097]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
EAPB-001	Major Accidents and Disasters	Emergency Access for BESS	The Schedule of Flooding Incidents on Station Road, Grendon indicates that these generally occurred at or near to White Mills Marina, off the northern section of Station Road. Alternative routes to the proposed BESS via Cogenhoe or Grendon would appear to be available. Could these be used by the emergency services when responding to an incident at the BESS if necessary? In answer to your question, the three bridges nearest Grendon across the Nene are marked on the map below: - They are from West to East, The Little Billing Causeway Bridge, (near to Billing Aquadrome and the water mill), The Earls Barton bends bridge (also referred to as the White Mills Marina bridge), near to the lock, and The Hardwater Crossing Bridge, (near to another mill and past Summer Leys. All three bridges flood regularly, but we only submitted a schedule for the Marina bridge. Please advise if you would like a schedule of flooding incidents/closures at the other two bridges. As you can see from the map, the Billing Causeway bridge is the main crossing point	The Applicant has followed NFCC guidance and has integrated internal BESS site access roads that are accessible in all weather conditions. The internal accesses have been discussed and agreed with the Northamptonshire Fire and Rescue Service as outlined under Matter FR-04 in the Statement of Common Ground **[REP2-063].** Northamptonshire Fire and Rescue Service will determine the most appropriate routes to the BESS sites in response to prevailing circumstances, with several route options available. The Applicant has consulted with Northamptonshire Fire and Rescue Service in regard to Scheme as outlined within the Statement of Common Ground **[REP2-063**], to date, no concerns have been raised in regard to flooding and access routes to the sites.

			for traffic coming from Northampton direction travelling East along the A45. The Marina bridge is for traffic coming from Wellingborough direction heading West along the A45, but also to/from Earls Barton. The Hardwater crossing bridge is mainly used for traffic to cross in order to join the A45 and A509.	
EAPB-002	Major Accidents and Disasters	Emergency Access for BESS	Local fire stations The 3 nearest fire stations to respond to a potential BESS fire at Grendon substation are:- Earls Barton (a retained station) Wellingborough (full-time firefighters) Mere Way Northampton (full time firefighters) During a non flood event, the Wellingborough fire station would likely react more quickly than Earls Barton. The firefighters would normally access the quickest route ie along the A45 and cross at the Marina bridge, this would take approx. 12 minutes. In the event of a flood event, the more likely route would be up the A509, through Grendon and down the other side of the village along Station Road. However, it should be noted, that Lower End Grendon, at the bottom of Main Road also	The Applicant notes this comment.

			floods, thereby potentially limiting access via that route.	
EAPB-003	Major Accidents and Disasters	Emergency Access for BESS	*Please see photo of firefighter up to his waist in Lower End 2024* The worst case scenario for the Wellingborough response team would mean the firefighters would need to travel up to the A509 to Warrington, then A428 and approach via Chadstone, as they could not cut through Easton Maudit or Yardley Hastings as the brook would be impassable. This was the scenario we faced in September 2024. This would increase the response time to 26 minutes.	The Applicant notes this comment.
EAPB-004	Major Accidents and Disasters	Emergency Access for BESS	During a non- flood event, the Northampton fire station would normally access the quickest route ie along the A45 and cross at the Billing Causeway Bridge then through Cogenhoe. In the event of a flood event, the most likely, route would be up the A428, through Brafield and then Cogenhoe. This would increase the response time to 20 minutes.	The Applicant notes this comment.

2.8 Fire Hazard and BESS Installation

Table 2.8: [REP6-098]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
FH-001	Major Accidents and Disasters	BESS Fire	This submission concerns issues relating to fire hazards associated with BESS installations and risks that arise. Although this issue has already been raised with the examiners, further information has come to light which has not been presented and to which we wish to raise attention.	The Applicant notes this comment.
FH-002	Major Accidents and Disasters	BESS Fire	The first issue concerns the increased frequency of fires associated with solar installatons and was published by QBE Europe, a firm of global business insurers. (The report is available at: hCps://qbeeurope.com/news-and-events/pressreleases/uk-fire-services-tackle-a-solar-panel-fire-every-two-days;) Although much of the data collated in the QBE report concerns domestic installations, the report identifies the sources of fires, and these are listed in the following tables (please refer to document linked)	The Applicant notes this comment and has responded in FH-003 below.
FH-003	Major Accidents and Disasters	BESS Fire	The report states that, because data was provided by only 37 out of the 49 national fire services the incidence is likely to be somewhat higher than those reported on the tables quoted. Although the report also acknowledges that the reasons behind these fires may lie, in many instances, with poorly installed equipment, it also highlights that there are heightened risks associated with the inverter which, they state, "is the hardest	QBE's report states that in 2024 there were a total of ~1.6 million solar panels installed nationally, the Applicant assumes this was intended to refer to there being approximately 1.6 million solar PV installations, not panels, in the UK in 2024 as the data being referred to, published by the Department for Energy Security and Net Zero, 'Solar Photovoltaics Deployment Statistics' records the number of installations

			working component in a solar panel system". However, whilst poor installation may be a cause, the report also underlines the dangers arising from external factors such as high winds or prolonged heat. In view of the increases in these hazardous events the question of the BESS installation, its structure and potential risks, is important to consider further. Two key points are raised: One relates to the closeness of proposed battery units to each other and the second to the issues of run-off arising from the fighting of any fire that occurred.	and MW capacity rather than the number of panels. The QBE research reported a total of 171 fires involving a solar panel in 2024, this equates to a fire incident at approximately 0.011% of the total number of solar installations in the UK. Although 12 fire services were unable to provide data to the research it is unlikely that a complete set of data would substantially change the calculated percentage of fires per solar PV installation. Therefore, according to the data provided, solar PV fires are rare occurrences. The Applicant notes that QBE's reported figures in the table titled 'Number of solar panel fires in 2024, by reported location' equates to 64% of fires being located at residential buildings, 25% at commercial and industrial buildings combined and 11% of the reported fires were located at solar farms. The Applicant confirms that the solar PV arrays will be designed, installed, and maintained in full compliance with established UK electrical standards which minimise fire risk. BS7671 Section 712, outlines the requirements for safe PV system design, appropriate coordination of protective devices, and effective earthing and bonding. These measures offer proven safeguards against common electrical fire risks such as overheating, cable faults, and DC arcing. As set out in **ES Chapter 4**

				Scheme Description [REP6-011], there will be testing and commissioning of the Scheme prior to the operational phase of the Scheme. The solar farm will be designed to withstand extreme weather conditions. Regular maintenance will be undertaken in line with the requirements of IEC 62446 and BS EN IEC 62446 2:2020, ensuring the long-term safe operation of the solar farm. This includes periodic inspection and testing of insulation resistance, connector integrity, and both AC and DC circuits for signs of wear or degradation. Please see response to FH-004 below in relation to battery unit spacing.
FH-004	Major Accidents and Disasters	BESS Fire	With regard to the battery unit installation we have noted, through advice, that the proposed containers required for the storage of the required energy quotients could mean that, as calculated from documents APP-205 and APP-206, the distance between the battery storage units could be 1 metre or even less. We accept that these suggested distances are es2mates because the applicant is not required to submit final specifica2ons at this point. However, these are best calculations based on available information and we invite the applicant to provide more specific detail. The spacing of battery storage units is relevant to the information provided above about the increased fire risks. In the event of any battery fire the chemical	The Applicant has addressed BESS spacing in **the Outline Battery Storage Safety Management Plan (OBSSMP) [REP5-075]** and in testimony at Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 **[REP3-075]** and Responses to Action Points. Section 4.1.22 of the OBSSMP stipulates: • NFCC guidelines allow reduced separation distances if suitable design features can be introduced. The BESS system selected at detailed design will have undertaken LSFT and utilised rigorous site specific consequence modelling

			constituents of any pollutants, and the potential area of dispersion, are fundamental issues. We quote, below, relevant academic studies to support our concerns. Most fundamentally these studies highlight the health risks to those living near to BESS installations and inverters. In previous documentation the applicant has only referred to large particles in the fire plume of PM10 size. However, it is the smaller particles of less than PM1 that are of most concern because these travel further and are more toxic. We invite the examiners to request information as to what particles and gases are in the plume, which will also be a good validation of the test procedures being relied on.	reports to demonstrate that in the event of a BESS failure loss will be safely limited to one BESS enclosure without the intervention of NFRS; • LSFT of the selected BESS design to establish minimum equipment spacing distances and site specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with LFR. An independent Fire Protection Engineer specialising in BESS will validate all UL 9540A, LSFT, and / or third party test and site specific consequence modelling data which has been provided; The Applicant notes the concerns raised regarding pollutants and particulate size from a potential BESS fire. **Environmental Statement Appendix 16.2 BESS Fire Emissions Modelling [APP-167]** already identifies and models the key gases and particulates associated with lithium iron phosphate battery fires, using measured data from full-scale burn tests of the same battery chemistry and configuration proposed for the Scheme. As set out in the assessment, concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN),

				hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO_2) and particulates were modelled using the model ADMS based on empirical test results. With respect to particulate size, the Applicant notes that published BESS fire test data do not provide PM_1 specific emission factors, nor do any regulatory bodies (UK, EU, US or WHO) set health-based standards for PM_1. However, it should be noted that very fine particles (including PM_1) form part of the PM_{10} value used in the assessment, as PM_{10} comprises all particulate matter less than 10 microns in diameter. The modelling presented in **Environmental Statement Appendix 16.2 BESS Fire Emissions Modelling [APP-167]** therefore represents a robust and conservative assessment using the best available data and appropriate health-based benchmarks.
FH-005	Major Accidents and Disasters	BESS Fire	We wish to draw further attention to the potential for run-off from any fire or firefighting activity associated with the BESS and inverter installations. The volumes of water that could be used may be huge. Again, an academic study is quoted to support our concerns associated with the immediately adjacent SPA and RAMSAR site. The bunding of any water from potential run-off is acknowledged, but the applicant should be asked to provide details of how and where any such	Please refer to the Applicants response to NF-015 above which provides details in regard to water provision, drainage and pollution prevention principles and disposal of potentially contaminated waters. The Applicant has thoroughly addressed all requisite BESS failure safety issues in the both the **Outline Battery Storage Safety Management Plan (Revision B) (OBSSMP) [REP5-075]** and **Plume Study BESS Fire Emissions Modelling Report [APP-167].**

			contaminated waters would be disposed of to avoid pollution either locally or elsewhere. Lastly, an issue that has not been evidenced during the enquiry concerns the potential impact of any pollutants that may affect the local ecology. The proximity of the SPA and RAMSAR designated sites has been documented during the examination together with the biodiverse environment being hosted. There has been no evidence presented regarding the impact on wildlife of any toxic escapes. We would ask the examiners to take a cautious approach to the assessment of this issue.	The Plume Study concludes that there are no significant impacts on sensitive receptors. As outlined in **Chapter 9: Ecology and Biodiversity [REP6-013]** with the implementation of embedded mitigation measures to minimise the likelihood and severity of battery fire have been incorporated into the Scheme, including the implementation of fire suppression systems, with containment measures in place to manage runoff in the event of a fire. The risk of a fire and measures to mitigate impacts in the event of a fire are detailed in the **Outline Battery Storage Safety Management Plan (OBSSMP) [REP5-075]**. Appendix A of the **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]** also outlines the consideration towards potential impacts to Sywell Wood associated with a fire at Green Hill C (BESS).
FH-006	Major Accidents and Disasters	BESS Fire	Concluding questions: A. Can the applicant confirm that the es2mated density of battery storage units (i.e. 1 metre spacing) in the BESS sites is a reasonable es2mate if the target genera2on figures are to be achieved? B. Does the applicant recognise the poten2al risks, not only of par2culates but of nano-par2culates	See the Applicant's response to FH-004.

			(Less than PM1) that may be present in the plume arising from a fire at BESS or Inverter sites? C. Can the applicant confirm that the compounds ethyl ethylphosphonofluoridate, ethyl methylphosphonofluoridate, and methyl methylphosphonofluoridate could be detected in the gases vented from a realistic assessment of a lithium-ion battery thermal event? D. Could the plume from any fire contain organophosphates (i.e. nerve agents)? E. Has the applicant considered the potential impact of any toxic escapes on the natural life within and beyond the adjacent protected areas?	
FH-007	Major Accidents and Disasters	BESS Fire	We request that the examiners seek unambiguous responses to these questions and that such evidence is fully accounted in assessments of BESS and inverter locations, particularly in view of proposed proximity to human habitation.	The Applicant notes this comment.

2.9 Statement read by Kay Brown at the OFH3

Table 2.9: [REP6-100]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
KB-001	General	Examination	I am Kay Brown, a resident of Mears Ashby and a member of SGHS, for whom I speak today. We should like to raise a point which may not yet been considered in this Examination. Within the Green Hill Solar scheme there are some large landowners who have agreed to their land being used. A number of residents who live in rented accommodation owned by such a landlord, or who depend for their livelihoods on a working relationship with the landlord, may be strongly opposed to the scheme but are afraid to speak out because they fear it would jeopardise their livelihood, their home or both.	The Applicant notes this comment.
KB-002	General	Examination	One hopes that this would not happen, and we stress that there is no evidence at this stage to suggest that it has. However, we hope the Inspectors will understand that it would not be an unreasonable concern, particularly in such precarious times. We have plenty of anecdotal evidence for it, for example around site F. It is a significant factor in discouraging people from coming forward to voice their concerns.	The Applicant notes this comment.

			Though the fear is real, we accept that there is probably nothing that can be done about it within the terms of the Public Examination. Nonetheless, Stop Green Hill Solar would like to bring it to the attention of the Examining Authority	
KB-003	Landscape and Visual Impacts	Landscape Impacts	In this context and with particular regard to Site F, we would also commend the Inspectors to review two earlier submissions by Stop Green Hill Solar: documents Rep1-204 and Rep1-203. These present very strong local concerns, with photographs, about the industrialisation of the beautiful landscape around Easton Maudit and Horn wood. As things stand, the design involves closure of ancient and attractive rights of way, and destruction of excellent views over open country and churches, across a wide area. These are a vital source of physical and mental wellbeing for local people, and also for the many walkers who come from further afield. On the south side of Easton Maudit, the Public Rights of Way TD9, TD5 and TD7, and adjacent fields FF28 to 32, are particularly affected.	Please refer to the Applicants response to KB-001 of the **Written Summary of the Oral Submissions at the Open Floor Hearing 3 and the Applicant's Responses [REP6-070]**. There are no proposed permanent closures of any PRoW associated with the Development. 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 from the addition of solar infrastructure, before the mitigation planting has become established. Following the establishment of the proposed landscape scheme, adverse effects are reduced to not significant from Year 15 of operation. 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. 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 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. 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 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). Within the Scheme, there is only one section of PRoW, where Solar has been proposed immediately to both sides of the route - NN|TA|4#1 (TP181) within filed FF4 to the north of Easton Maudit and east of Grendon. This section of PRoW can be seen on 6.4.4.17 B Environmental Statement Figure 4.17 Landscape and Ecology Mitigation Plan F Sheet 1 (Revision B) (Clean), [**REP3-052**]. Here, the PRoW passes through field FF4. A 15m offset from the PRoW to the proposed fenceline has been allowed for on both sides (as a minimum), and then an offset of 4m from proposed fenceline to the proposed panels. This gives a total width of 38m from panel to panel along the route of the PRoW.

				There are other examples of PRoW passing alongside the array, however where this has occurred, the layout of the scheme has responded to this juxtaposition by only proposing solar infrastructure directly along one side of the route. An example of this can be seen within Site F within field FF11 where PRoW NN|TD|2 (TP184) passes to the north of the panels within this field, here the northern section of the field has been put to Tussock Grassland. This section of PRoW can be seen on 6.4.4.17 B Environmental Statement Figure 4.17 Landscape and Ecology Mitigation Plan F Sheet 1 (Revision B) (Clean), **[REP3-052]**. In other locations PRoW are typically separated from the array on one side by existing features within the landscape such as hedgerows and woodland. An example of this situation can be seen within Site F along the northern boundary of field FF19 where PRoW NN|TA|3 (TP185) passes along the southern side of an existing hedgerow. Panels are proposed with the field to the south of the PRoW (FF19), and also within the field to the north (FF18) beyond the adjacent hedgerow. To the south, the proposed fenceline has been offset by a minimum of 17m, and then an offset of 4m from the proposed fenceline to the panels. This gives a total minimum width of 19m from

				the PRoW to the panels. To the north, immediately there is the adjacent hedgerow, and then a minimum of 15m from the hedgerow to the proposed fenceline, and then a further 4m from the proposed fenceline to the proposed panels. This results in the proposed panels being offset a minimum of 19m from the existing hedgerow. This arrangement is typical across the Scheme. This section of PRoW can be seen on 6.4.4.17 B Environmental Statement Figure 4.17 Landscape and Ecology Mitigation Plan F Sheet 1 (Revision B) (Clean), [**REP3-052**].
KB-004	General	Unaccompanied Site Inspection	We do appreciate that you visited this site recently on an Unaccompanied Site Inspection (USI 2, 26th Feb). At this time of year the woods and hedgerows are coming alive of course, and the air is once again filled with the song of skylarks. It lifts the human spirit, as it does every year. The thought that it might soon be carved up, fenced in and panelled over, for sixty years, is now weighing very heavily on the hearts of local people, even though they might feel afraid to voice their concerns publicly.	The Applicant notes this comment. Mitigation has been implemented to retain or mitigate for the loss of as many of the skylark territories recorded during baseline surveys as possible, although it is acknowledged that the Scheme would result in an adverse residual effect on skylark. However, a suite of beneficial residual effects on other wildlife receptors are also anticipated as a result of the Scheme during the operational phase, including for badgers, foraging and commuting bats, amphibians (including great crested newts), reptiles, and other breeding birds. The Scheme will also deliver a minimum 47% biodiversity net gain in habitat units, and a minimum 10% net gain in both hedgerow and

				watercourse units. This is secured by Requirement 9 of the **Draft Development Consent Order (Revision F) [EX7/GH3.1_F]**.

2.10 Permissive Path Management

Table 2.10: [REP6-095]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PPM-001	Human Health	Permissive Paths	The Plan for public rights of way (APP-554 1.3.1) sets out to provide "a framework for the management of PRoWs throughout the scheme. The key aim is to ensure that PRoWs remain open, accessible and safe at all schemes throughout the Scheme's construction, operational and decommissioning phases". Management of "permissive paths" during the operational phase is also included in the document.	The Applicant notes this comment and confirms the most recent version of this document submitted to examination is the **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]**.
PPM-002	Human Health	Permissive Paths	A table of 23 footpaths, 11 bridleways and one BOAT (Byway Open to All Traffic) are outlined in that document. Document GH2.6 was published alongside GH7.10 which provides maps without commentary.	Document GH2.6 refers to the **Public Rights of Way Plan (Revision C) [REP3-012]**. This plan shows the extent of PRoWs affected by the Order Limits, and thus the PRoWs subject to powers under Schedule 6 to the **final Draft DCO [EX7/GH3.1_F]**.
PPM-003	Human Health	Permissive Paths	In January 2026 a further document was published (GH8.2.8) pursuant to examination deadline 4, which was prepared "in response to matters raised by Interested Parties at Open Floor Hearing 2". The document makes no reference to what specific points are being responded to, nor who raised the issues that gave rise to the document. However, efforts to clarify the full implications of the applicants' plans are welcomed.	Document GH8.2.8 refers to the **Public Rights of Way and Permissive Paths Plan [REP4-025]** which provides a visual representation of both existing public rights of way and proposed permissive paths across the Order Limits. The provision of the plan was made in response to commentary by Ms. Jarvis at Open Floor Hearing 2 (please refer to JJ-007 in **Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's**

				Responses [REP3-129]) and in the context of discussions around permissive paths held during Agenda Item 3.5 at Issue Specific Hearing 2 (refer to **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP3-075]**). Given the prominence of discussion around the topic, the Applicant considered it useful for the ExA and Interested Parties to have access to a single plan showing both PROWs and permissive paths.
PPM-004	Human Health	Permissive Paths	Two of the documents are prepared by Lanpro Services whilst document GH7.10 was prepared by KMC. Although these were – presumably – prepared by different authors, it is assumed that the documents can be taken together as a representation of those Public Rights of Way to be impacted by the scheme. However, it should also be noted that documents do not identify locations where PRoW's are impacted but where no alternative is offered, nor does it provide meaningful information about the ways in which the proposed permissive paths substitute paths around solar arrays for footpaths across hitherto open fields.	The Applicant confirms that technical consultants from both Lanpro and KMC are part of the Applicant team and as such both have authored documents relevant to PROWs on the Scheme. The **Public Rights of Way Plan (Revision C) [REP3-012]** shows the extent and location of PROWs within the Order Limits, that are subject to the overarching powers being applied for under Schedule 6 to the **final Draft DCO [EX7/GH3.1_F]**. The **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]** sets out the controlling mechanisms under which those powers can be exercised. As this is an outline document, details of which PROW will be treated in which manner have not yet been determined. This will be undertaken at the detailed design stage, post-consent. The mechanisms set out in the **Outline Public**

				Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033] are secured by Requirement 18 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**. This requires a detailed plan substantially in accordance with the outline plan to the submitted and approved by the relevant local planning authority in consultation with the relevant local highway authority, ahead of constriction taking place. Permissive paths proposed as part of the Scheme are considered as supplemental to the PROW network and not a substitute for existing PROWs.
PPM-005	Human Health	Permissive Paths	It should be pointed out, first of all, that the nature and situation of the proposed solar farm, being across eight different locations plus either one or two BESS sites, means that more PRoWs are impacted than would be the case if the scheme had been designed to be more compact. More footpaths used by more walkers and horse riders will be altered and views removed than would be the case with a different design. It has already been pointed out that the search for brownfield sites – which would have far less visual and amenity impact – was compromised from the beginning by the way in which land was sought for the scheme.	Please refer to the response to 'SGHS-003' in the **Applicant's Further Response to Deadline 4 Submissions [REP6-062]** in regard to site selection, use of brownfield land and approach to the dispersed nature of the scheme, specifically the benefit in a Scheme comprising a series of independent areas of land or Sites.
PPM-006	Human Health	Permissive Paths	It has been pointed out that the proposed permissive path (through AF17 to AF29) will result in an enclosed corridor. It would also result in a 60-year alteration to what has been	The existing permissive access along the 'green lane' within Green Hill A is already set between mature hedgerows for its entire length with views of the countryside at field access gates

			open countryside for walkers and a prospect that is unattractive for recreational walkers. It appears to be a prime example of obliging walkers to go around an extensive plantation of panels.	only. The Scheme commits to maintaining these hedgerows with any supporting planting located on the outside of the existing hedgerows, this retaining the green lane's full width and screening views of the Solar PV Array in neighbouring fields. The Scheme commits to retaining permissive access on the green lane throughout construction and the Scheme's operational phase, with an extended permissive access route to create a continuous loop provided as part of the Scheme to improve recreational functionality. On the extended routes, the permissive access route would be located alongside reinforced existing hedgerows, meaning views of the Solar PV Arrays would only be to one side of users at any given point along the route. Treatment of planting and the route of the proposed permissive path for pedestrians, cyclists and equestrians are shown on **ES Figure 4.10 Landscape and Ecology Mitigation Plan A (Revision D) [REP6-021]**, secured through the **Outline Landscape and Ecological Management Plan (Revision E) [REP6-047]** by Requirement 7 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.
PPM-007	Human Health	Permissive Paths	This is, effectively repeated at A2 where the proposed permissive path will presumably be impaired by the cable construction for an as yet unspecified period of scheme.	The proposed permissive path at Green Hill A.2 is proposed to be created as part of the Scheme's construction, and likely will only be open to users once construction works are completed at this location. Construction works

				on Green Hill A.2 and on this section of the Cable Corridor are anticipated to overlap somewhat, albeit this is not confirmed, however all works will be undertaken within the defined construction period.
PPM-008	Human Health	Permissive Paths	At Greenhill D a permissive path is offered in addition to the retention of footpath NN/TN/3. This is an existing footpath and hence will not require any construction. However, it is not clear that the same is the case at Greenhill E where a new permissive path for pedestrians and horse riders to connect Wilby Road to Earls Barton is proposed. It is not made clear, within the documentation, what the current status of that route is, nor whether any construction will be required to ensure that it is properly instated as a usable path.	The Applicant confirms the Scheme has included provision for access along the definitive route of footpath NN|TN|3, and along the 'as walked' route of the footpath. The provision of a permissive path for pedestrians, cyclists and equestrians from Wilby Road, Mears Ashby to Earls Barton largely follows existing field access tracks, some of which has permissive access already in use (from BOAT NN|TN|10 to the derelict Field Barn), as demonstrated on **Public Rights of Way and Permissive Paths Plan [REP4-025]**. Surface treatment for the proposed permissive paths will be determined at the detailed design stage in consideration of British Horse Society requirements for routes used by equestrians, and will be approved by the local highways and planning authority through the provision of a detailed Public Rights of Way and Permissive Paths Management Plan (substantially in accordance with the **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]**) secured by Requirement 18 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.

PPM-009	Human Health	Permissive Paths	Site F highlights the greatest amount of footpath disruption and alteration, exemplifying the replacement of what have been, for generations, open paths across fields. Their substitution with permissive paths requires walkers to walk around solar plantations. The suggestion that connections are improved is not accepted. Fields such as FF28 and FF33 will no longer be country routes.	Permissive paths proposed as part of the Scheme are considered as supplemental to the PROW network and not a substitute for existing PROWs. Impacts to individual existing PROWs have been assessed in **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]**, with mitigation measures for visual impacts and impacts on use set out in the **Outline Landscape and Ecological Management Plan (Revision E) [REP6-047]** and **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]**, secured by Requirements 7 and 18 respectively of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.
PPM-010	Human Health	Permissive Paths	Lastly, there is an impact on walkers near to Lavendon with the creation of a permissive path around GF1 and GF6. Similar comments apply.	Permissive paths proposed as part of the Scheme are considered as supplemental to the PROW network and not a substitute for existing PROWs. Impacts to individual existing PROWs have been assessed in **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]**, with mitigation measures for visual impacts and impacts on use set out in the **Outline Landscape and Ecological Management Plan (Revision E) [REP6-047]** and **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]**, secured by Requirements 7 and 18 respectively

				of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.
PPM-011	Human Health	Permissive Paths	The logic behind the provision of these alternative, permissive paths is not stated in GH7.10, nor in the other documents referenced here. It might be assumed that the developer is in fact under no obligation to provide any alternative or "permissive" routes. However, one reference to their provision is stated in GH6.2.18 where the applicant notes that permissive paths were included in the scheme as a result of consultation with public health bodies. Although there is no reason to doubt this, the interesting point that arises is that it appears in relation to discussions about human health and mental health. Therefore, public health bodies have intimated to the developer that removal of public rights of way would be detrimental to health. The question which then arises is whether and to what extent alternative paths will mitigate impacts on health.	Permissive paths proposed as part of the Scheme are considered as supplemental to the PROW network and not a substitute for existing PROWs. The provision of permissive paths as part of the Scheme was borne from consultation comments from North Northamptonshire Council, Mears Ashby Council, and by a notable number of members of the public engaged with the statutory consultation process. The Applicant has therefore committed to providing these permissive routes as part of the Scheme, and their provision is secured through the **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]**, by Requirement 18 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**. The Applicant is fully aware of the physical and mental health benefits of access to PROWs and the countryside and has duly assessed the impact of the Scheme under the heading 'open space, leisure and play' in **ES Chapter 18: Human Health [APP-055]**. The Scheme does not propose the removal of PROWs, nor closures for any duration more than is practicably required to undertake works safely around PROWs. There is no intention for closures to last the entirety of site construction works. Hence, no significant adverse effects to health as a result of impacts on 'open space,

				leisure and play' is considered likely to occur at any phase of the Scheme. Matters of impacts to PROWs have been agreed by the three host local authorities as set out in the respective Statements of Common Ground **[EX7/GH8.3.1_C**, **EX7/GH8.3.2_C** and **EX7/GH8.3.3_C]**.
PPM-012	Human Health	Permissive Paths	In various submissions the developer has pointed out that walkers will not see the solar panels because hedge planting will screen them from view. This will take some 15 years for the hedges to reach around 4.5 metres. Two points can be made about this: First, that 15 years is not a short duration for the impact of these new routes to be felt. Second, hedges require to be trimmed each year if their health is to be maintained. The documentation on hedges displayed at Castle Ashby refers to the need for annual cutting. It is noticeable that each winter the hedges around local fields are indeed cut – to a height of perhaps 2 metres. This will mean that, to reach 4.5 metres, hedges will need to be little tended and allowed to grow higher, not only obscuring the views, but also being out of line with other hedges that have been pruned. The character of the landscape is therefore significantly altered for the lifetime of the scheme.	Hedge planting to support and reinforce existing hedgerows such as through thickening or gapping up, and the planting of new hedgerows are intended to mitigate visual impacts from the Scheme by screening views towards the Scheme. The Applicant acknowledges that this will not screen views for every receptor, but should reduce visibility from the majority. The Applicant also understands that as planting needs time to mature, impacts within the first 15 years are likely to be greater than the point from which planting has fully matured. This distinction in assessment timescales has been considered in the assessment within **ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]**, as has determination of the likely impacts on future landscape character as a result of the proposed planting measures. Planting and management regimes for new and existing hedgerows and hedgerow trees are set out in the **Outline Landscape and Ecological Management Plan (Revision E) [REP6-047]**.

				This is secured by Requirement 7 in Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.
PPM-013	Human Health	Permissive Paths	It is understood that where crossing of footpaths is required for cable routing that there will be a requirement for temporary closure. This may apparently happen at night (GH7.10 para 3.2.15) or "in a short duration". The noise of the work is not referred to.	The Applicant confirms that the **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]**, secured by Requirement 18 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]** includes provision for temporary closures of PROWs to facilitate onsite and cable construction works. The Applicant has committed to 'where a temporary closure, restriction or diversion is required, this will only be put in place for as long as is reasonably necessary'. Where overnight works are required, such as for horizontal directional drilling, or installation of cabling, the level of noise and vibration is controlled and monitored through the measures set out in Table 3.8 of **Outline Construction Environmental Management Plan (Revision D) [EX7/GH7.1_D]**, secured by Requirement 13 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**.
PPM-014	Human Health	Permissive Paths	GH2.6 – the Public Rights of Way Plan references "TF/004". Although "TF4" is referred to in GH7.10, there seems to be no further mention of this. The footpath referred to runs from the village of Grendon to the village of Castle Ashby. The key at the side of the map indicates that it will be "temporarily stopped up" at the point where it crosses a brook halfway between the villages. This blocking up of the path is due to the construction of a hard surface	The Applicant refers to verbal submissions and the respective post-hearing note made in respect of Agenda Item 3.4 in the **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 5 [REP6-067]**. The Applicant confirms that TF/004, TF4, and NN|TF|4 all refer to the same public footpath, with labelling nomenclature dependent on

			track to allow construction vehicles to move from Station Road to Compound 4 on Yardley Road.	information source. Temporary closure of NN|TF|4 would be for discrete sets of works. In this location this is anticipated to include: laying down of the access haul route to Construction Compound 4, digging of trenches for the Grid Connection Cables, installation of cables themselves, and finally removal of the haul route and reinstatement of the land.
PPM-015	Human Health	Permissive Paths	The temporary stopping up, in the case of TF004 or TF4 is for two years. Greenhill offered a compromise to Wellingborough Council for the Waendel Walk weekend each year. However, the needs and uses of the footpath for regular users is entirely ignored. There are not only dog walkers and other leisure related walkers who use this path. It also provides the nearest reachable shops (for example the food outlet at Castle Ashby) for anyone without a car. This closure, together with construction noise and heavy goods vehicles will cause a high degree of disruption and damage. An alternative to this, with a new permissive path, is requested if the project is to be approved.	The Applicant refers to verbal submissions and the respective post-hearing note made in respect of Agenda Item 3.4 in the **Written Summary of the Applicants Oral Submissions at Issue Specific Hearing 5 [REP6-067]**. The Applicant reiterates that any temporary closure or 'stopping up' of NN|TF|4 would be for discrete sets of works (as set out above at 'PPM-014') and therefore is not proposed to be for the entire 18-month construction period for the Cable Route Corridor. The Applicant is committed to reinstatement of the PROW surface to its present condition, as secured through the **Outline Public Rights of Way and Permissive Paths Management Plan (Revision C) [REP6-033]** by Requirement 18 of Schedule 2 to the **final Draft DCO [EX7/GH3.1_F]**. The Applicant furthermore reiterates that any diversion or closure would have to be agreed by the local highway authorities in consultation with community representatives, as part of the

				approval of the detailed Public Rights of Way and Permissive Paths Management Plan.
PPM-016	Human Health	Permissive Paths	The conclusions of any review of the footpath schemes – those slated for closure, for alteration, for substitution, for traversing by trenches – is that local residents will be severely impacted both in the short and longer term.	The Applicant is confident that the scale and duration of impacts to PROW users affected by the Scheme has been adequately assessed in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and its supporting **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]**, and finds no significant effect to any individual PROW or to the overall PROW network within the 2 km Study Area.
PPM-017	Human Health	Permissive Paths	For any rating of the impact on local residents we request that it is viewed in light of the large numbers of local residents and non-local visitors who would be impacted. A more concentrated scheme would affect fewer people; a scheme focussed on brownfield sites would impact fewer people. This scheme, distributed as it is across such a wide area, has more impacts on more people than is necessary.	The Applicant is confident that the scale and duration of impacts to PROW users affected by the Scheme has been adequately assessed in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and its supporting **ES Appendix 17.1: Tourism and Recreation Receptor Tables [REP1-079]**, and finds no significant effect to any individual PROW or to the overall PROW network within the 2 km Study Area.