

Relevant Representation – Green Hill Solar DCO

Interested Party: Stop Green Hill Solar

Project: Green Hill Solar Nationally Significant Infrastructure Project (NSIP)

Reference: EN010170

Submission Type: Relevant Representation

Subject Area: Ecology – SPA/Ramsar Site, SSSI, and Protected Species

1. Potential Impacts on SPA/Ramsar – Golden Plover, Lapwing & Bittern

- The DCO's Environmental Statement, GH62.9 Chapter 9 (Ecology & Biodiversity), acknowledges field usage by qualifying bird species: for example, golden plover were recorded at Green Hill B, E, and F, with significant flock sizes over threshold levels; lapwing usage is also evident across multiple sites.
- The Habitats Regulations Assessment (May 2025) confirms this site includes "functionally linked land" used by SPA/Ramsar birds, and that Appropriate Assessment is required due to potential effects from construction, operational pollution, water runoff, and disturbance.

Requests:

- I request compliance with Regulation 64 to ensure that there is no alternative solution that would have a lesser impact on the SPA/Ramsar, consider IROPI, and genuine compensation/mitigation measures, not just suggestions.
- I request publication of all field-level survey data, including maps highlighting field usage by key SPA species.
- I request quantitative disturbance modelling for construction and operation phases, including worst-case scenarios.
- I request explicit mitigation measures and compensation for loss of habitat outside SPA boundaries, secured through the DCO.

2. Risk to SSSI – River Nene Hydrology & Contaminants

- Chapter 22 of the PEIR identifies the River Nene, a SSSI, SPA, and Ramsar water body, about 620m north of the BESS site. It confirms that the cable corridor crosses surface watercourses and could cause moderate impacts to controlled watercourse mitigation.
- The HRA also highlights risks from waterborne pollution, with potential long-term effects on the River Nene's hydrological regime and water quality.

Requests:

- I request enforceable 50m vegetated buffer zones from all watercourses tied to the SSSI/SPA.
- I request full water quality and hydrology modelling showing neutral or positive impacts from the cable corridor and BESS run-off.
- I request binding commitments to limit pesticide/fertilizer use in adjacent land, and full pollution controls included in the DCO requirements.
- I request an appropriate assessment re BESS and substation fire safety regulations. Regulation of BESS installation, prevention of contamination from lithium, fluoride and other chemicals present in BESS which have a history of catching fire and causing ecological disaster.

3. Protection of Schedule 1 & Priority Species – Bittern & Reedbed Birds

- DCO ecology data notes the presence of reedbed habitats and confirms occasional bittern detections offsite, adjacent to the SPA/Ramsar boundary.
- It is known that the bittern visits the Pastures Farm Reedbed every year, not occasionally as stated in the DCO. The bittern is a very rare bird that deserves protection from dust, polluted water sources and fire risk

Requests:

- I request targeted surveys for reedbed birds during sensitive seasons (e.g. breeding, overwintering), with a full assessment of risks and disturbance potential.
- I request that all cable installation, BESS erection, or vegetation removal be conducted outside those sensitive periods.
- I request implementation of compensatory reedbed creation or enhancement, with details secured through a DCO Requirement. But preferably for the BESS to be relocated away from the ecological areas of protection.

4. Incomplete Cumulative and BNG Assessment

- Chapter 9 and the HRA do include cumulative effects sections, but the focus is heavily weighted toward landscape and hydrology, with insufficient detail on in-combination ecological impacts.
- The ecological chapter includes biodiversity net gain (BNG) projections, but specific baseline data, habitat targets, and monitoring measures are primarily detailed only in technical appendices.

Requests:

- I request publication of comprehensive cumulative assessments combining this scheme with others within 10km of the SPA (e.g., other NSIPs or local developments).

- I request full disclosure of BNG metric calculations for each habitat type, showing delivery, management, and monitoring over a 30-year period.
- I request a dedicated Ecological Management Plan inclusive of proactive monitoring, adaptive management, and clear reporting commitments.

Summary Table

Concern	Required Action
SPA/Ramsar bird usage compensation	Field-level survey maps; disturbance modelling; habitat
SSSI hydrology & water quality	Buffer zones; neutral hydrological modelling; pollution controls
Bittern & reedbed species compensation	Seasonal bird surveys; avoiding works in key periods; habitat
Cumulative impacts & BNG management plan	In-combination ecology assessments; full BNG metrics; long-term

Submitted by:

[Your Name]

[Your Address or Organisation]

[Your Email Address]

Date of Submission: 2025-07-18

Have Your Say Green Hill Solar Farm Northants and Bucks Interested Party Reference F859AC5B

Dear Inspector

I would like to respond to IGP responses to Deadline 6 issues raised concerning Ecology in particular the SPA/Ransar sites and Wildlife around the proposed BESS site at Grendon.

My points are in respect of

Protection of Wildlife in SSSI, Ransar, SPA with reference to the endangered BITTERN & REEDBED at Pastures Farm Station Road Grendon

I attach the relevant representation document I sent to PINS on 20 July 2025 concerning ecological and hydrology issues in the Green Hill Solar PIER.

The attached document mentions the Bittern which is an Internationally recognised Schedule 1 and priority bird Species making it illegal to disturb them intentionally or recklessly. Subsequent documents provided by the applicant have mentioned the Golden Plover and Lapwing, but I have not been able to see any reference to Bittern.

Pastures Farm Reedbed at Grendon (see attached location map) is a 27 acres reedbed, lake and wetland which was constructed in 2009 by Mr & Mrs Skinner * of Pastures Farm, under a Countryside **Stewardship Agreement** (CSA) which had funding through a grant from The Wildlife Trust with recommendations from Natural England and /or Forestry Commission. The CSA was introduced to support DEFRA's 25-year plan for our country to be "the heathiest most beautiful place in the world to live, work and bring up a family"

Since July 2025, IGP have amended the solar farm proposal to exclude BESS 3 which would have been closest to the areas of ecological protection and reedbed. Despite this amendment to the scheme, I do not think that the importance of the Pastures Farm Reedbed has been acknowledged by the applicant. **At least 2 pairs of breeding Bitterns nest in the reedbeds** at Pastures Farm which is adjacent to proposed cable routes and other connections to Grendon substation as well as the proposed BESS 1 & 2.

In addition to the proposed construction of the BESS and installation of cables, the recent IGP Environmental Statement – Technical Addendum to Chapter 14: Noise and Vibration states that there will be directional drilling which creates 55DB of noise, around Station Road and the substation area which will undoubtedly disturb all the nearby wildlife and residents.

My question to the Inspector is - Has sufficient weight been placed on the negative effect of the proposed Green Hill Solar Scheme if it results in disturbance to the Pastures Farm Reedbed and the subsequent decline of the Bittern which is a protected species with only 283 known birds left in the UK.

* (The owners of Pastures Farm are one of the landowners who have agreed to option their land for the solar farm)

Judith Smith BSc MRICS
Stop Green Hill Solar

