



## Adequacy of Consultation Representation Proforma

Under *Section 55(4)(b) of the Planning Act 2008* (as amended) (PA2008) the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

<b>Project name</b>	Green Hill Solar Farm
<b>Date of request</b>	23.05.2025
<b>Deadline for AOCR</b>	06.06.2025
<b>Return to</b>	<a href="mailto:greenhill@planninginspectorate.gov.uk">greenhill@planninginspectorate.gov.uk</a>

Please complete the proforma outlining your AoCR on the above NSIP.

<b>Local Authority</b>	North Northamptonshire Council
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In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

*Please note that this is specifically about the statutory consultation(s) undertaken.*

<b>Assessment of Compliance - Required</b>	
<b>S42 Duty to consult</b>	Yes
<b>S47 Duty to consult local authority</b>	Yes
<b>S48 Duty to publicise</b>	Yes

If you would like to give more detail on any of the above, please do so below.

*Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.*



Additional comments - <i>Not compulsory</i>	
<b>S42 Duty to consult</b>	<p>The applicant commenced early engagement with NNC from January 2024 and the applicant conducted a period of non-statutory engagement from March 2024.</p> <p>NNC responded to the EIA Scoping Opinion request from the Planning Inspectorate.</p> <p>The consultation was carried out with all the prescribed bodies, non-statutory bodies, local authorities and persons with an interest in the land as set out in the Consultation Report.</p>
<b>S47 Duty to consult local authority</b>	<p>The consultation was carried out in the manner set out in the Consultation Report.</p> <p>The applicant held regular meetings with NNC throughout the majority of the pre-application process up until the submission of the Development Consent Order (DCO) application.</p> <p>The regular meetings included the Planning Lead and technical meetings as required took place with landscape, highways, ecology, environmental protection, archaeology, minerals and waste, fire and rescue and heritage officers.</p> <p>Consultation workshops took place between March and May 2024 with a summary of the workshops shared in September 2024.</p> <p>The applicant attended a Members Briefing in May 2024 to update the proposals progress.</p> <p>NNC were provided the opportunity to comment on the draft Statement of Community Consultation. A formal request for comments was required between 12.08.24 – 20.09.24. NNC submitted their response on 17.09.24.</p> <p>The applicant prepared and published a Statutory Consultation and Preliminary Environmental Information Report (PEIR), allowing 6 weeks for responses (07.11.24 – 19.12.24). NNC submitted their response on 19.12.24.</p> <p>A further targeted consultation took place for 28 days between 13.03.25 – 10.04.25. This extended consultation was due to minor alterations in the Scheme's boundary (access and transport related). The targeted consultation was extended by a further 7 days at the request of NNC as some residents had raised that the targeted consultation newsletters were delivered via post late into the consultation period. NNC submitted their response on 07.04.25.</p>



<b>S48 Duty to publicise</b>	<p>This was good throughout the process and the applicant's website was useful in this regard.</p> <p>The applicant publicised the proposed application in the prescribed manner.</p> <p>We can advise that we have viewed the applicant's s48 Notice (published on their website).</p>
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<b>Any other comments</b>	<p>NNC have read the applicant's Consultation Report and associated Appendices of May 2025.</p> <p>NNC have had regard to Sections 42, 47 and 48 of the 2008 Planning Act and are of the view that Island Green Power have carried out adequate pre-application consultation in accordance with the provisions as set out in Sections 42, 47 and 48 of the Act.</p> <p>However although NNC are of the view that applicant has met the procedural requirements of Sections 42, 47 and 48 of the Act, these are basic procedural requirements.</p> <p>Whilst the applicant has engaged in a procedurally compliant pre-application consultation, NNC would like to raise to PINS that the engagement has not always been meaningful or effective as some information and the subsequent applicant responses on the proposed scheme has been limited. For example, responses from the applicant on matters such as the final cable route area, panel design or access/traffic detail to each site area and any impact each one may have, are deferred by the applicant to the Environmental Statement or to follow within other documents. Such documents NNC (and all other stakeholders) do not have an opportunity to view until a DCO is accepted. This is not considered to be in the spirit of front-loading the DCO process. No feedback has been provided from the applicant following the comments raised during the targeted consultation. Consequently, this has limited the ability of NNC and local people to fully engage with the process and respond in a meaningful way.</p> <p>This lack of full detail during the pre-application stage may have an impact on the effectiveness of the pre-examination as numerous matters remain outstanding. It may also have consequences with regard to the Statements of Common Ground or any Principal Areas of Disagreement Summary Statements etc. Should the application be accepted, NNC request that PINS ensure adequate time is allowed to address these matters in the pre-examination period.</p> <p>Notwithstanding the above, NNC has been contacted by 'Stop Green Hill Solar Action Group' who have raised specific concerns about the adequacy of consultation undertaken and question if Island Green Power has adequately completed its obligations pursuant to Section 47 of the 2008 Planning Act. A copy of 'Stop Green Hill Solar Action Group' comments are attached to this response for information purposes only and whilst NNC does not wish to make any comment on this, the Planning Inspectorate are invited to consider 'Stop Green Hill Solar Action Group' comments when deciding to accept the application or not.</p>
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**From:** [REDACTED] stopgreenhillsolar.co.uk>  
**Sent:** 29 May 2025 15:46  
**To:** [REDACTED]  
**Subject:** Adequacy of consultation: Greenhill solar proposals

**[CAUTION: EXTERNAL EMAIL]** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear [REDACTED]

**Re: Greenhill solar Development Consent Order and Adequacy of Consultation response.**

Following the submission of the Development Consent Order to the Planning Inspectorate by Greenhill Solar, we are writing to request that, as the host council for this proposal, you **do not** endorse the consultation process and, in particular, that you ask for a re-run of the "Targeted re-Consultation", We regard this secondary consultation as ill-considered and poorly presented.

Our key concerns are:

1. The targeted consultation, following from the PEIR at the end of last year, clearly indicates that the developers had not considered or clarified all the transportation implications of their proposed development. They have therefore sought to provide themselves with additional leeway "just in case" they require it. We submit that in a major development of this nature any such vagueness is not acceptable.
2. Most significantly, for large numbers of residents in the affected areas, the diagrammatic information publicised with the consultation are impossible to decipher. The maps cannot be subjected to a clearer contextual examination because they cannot be expanded or – more helpfully – contracted to show the wider context. Not all the roads are clearly marked and proposed alterations to those locations is not specified. This has meant that it is not possible to provide comments or propose alternatives to the schemes and, in effect, gives the developers carte blanche to cause major disruptions and dangers on what are mainly minor rural routes.

We are aware that Sarah Bool MP has written to Greenhill solar to complain about this as well. To date we are not aware of a response from Greenhill solar.

3. The targeted consultation also fails to clarify some key questions that were raised during the consultation on the PEIR. Representatives from Greenhill solar were asked to confirm whether a hard-surface access would be constructed from the A509 to Easton Maudit in order to ensure minimal road traffic on the minor roads around Bozeat and Easton Maudit. The information provided in the targeted consultation not only fails to clarify this but appears to suggest (if the map is correctly interpreted) that the existing road may be used and widened if necessary to facilitate

the transport of Heavy Goods Vehicles. This may be a misinterpretation of the developers' intentions but illustrates part of the difficulty with this aspect of the consultation.

For these reasons, and in summary, we object to any acceptance of the consultation process until it has been properly executed and request, via yourselves, that PINS responds to the DCO and Adequacy of Consultation with a requirement to clarify and re-run the second consultation.

Yours sincerely



(Chair, and on behalf of Stop Greenhill Solar)

Cc: Chair of the Council, Councillors for Irchester and Earls Barton Wards.