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7th November 2025

PINS ref: EN010170

Application by Green Hill Solar Farm Ltd. for an Order granting Development Consent for a proposed solar development on land between Northampton and Wellingborough

CPRE Northamptonshire
Written Representation
November 2025

Introduction

Although not formally qualified, I have been the Renewable Energy Specialist for CPRE Northamptonshire for 20 years. In this time, I have responded to many EIA applications, presented evidence at appeals and worked nationally within CPRE to develop national CPRE policy relating to renewable energy. CPRE is very concerned about the impact of climate change but we seek to ensure that renewable energy schemes are sited in appropriate locations.

We assess solar farm applications against our solar farm policy. The criteria that we use when assessing schemes weighs the following factors:

- The visibility of the scheme in the wider landscape
- Whether it harms a valued or sensitive landscape
- Whether it harms views from settlements and for users of Public Rights of Way
- Whether it harms the setting of settlements
- The detrimental impact on food production.

Since the policy was created we have also identified that noise from equipment must also be considered both in the way that it may affect rural residents and how it affects the tranquillity of those enjoying the countryside.

This scheme has an accompanying BESS system which brings with it additional risks of fire and pollution.

A company limited by guarantee
Registered in England number 5564879
Charity registration number 1116687
Registered Office: Headlands House, 1 Kings Court, Kettering Parkway, Kettering, Northamptonshire NN15 6WJ

General Comments

In its assessments of the scheme the DCO focuses attention on summer impacts after 15 years of operation after the screening is fully mature. While we do not disagree that screening would mitigate the impacts of the scheme, we feel that it is vital to remember that almost a generation would have to pass before screening would be fully mature.

We gain the impression throughout the DCO that it understates impacts that would be felt locally. In our response to the PEIR we expressed concern that **Table 2.1: Sensitivity Criteria** in **ES Chapter 2** appears to devalue the level of sensitivity for local impacts. If anything, the sensitivity of the local communities that would have to live with the scheme is much higher than others because they would experience impacts on a daily basis. We recognise that the Examining Authority may ultimately judge that national needs override the impacts on local communities, but it is vital that such a judgement should be made in the knowledge of the true level of impacts that the local community are expected to accept.

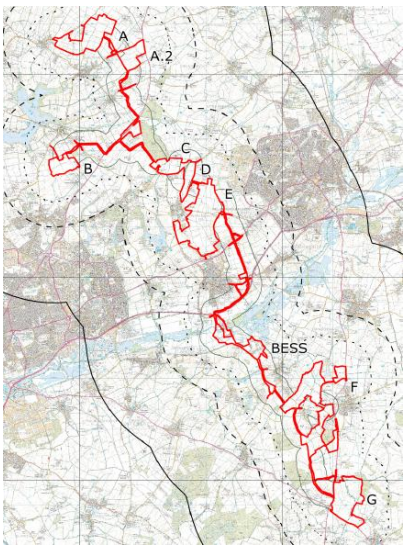
Scheme Design

Although the scheme is presented as a single scheme, it comprised of eight separate sites of solar PV panels connected together with underground cabling and a separate BESS. It seeks an unusually long 60-year permission.

Multiple sites

Spatial planning is a vital technique employed when creating local plans. Its purpose is to define zones where compatible activities take place and to prevent adverse impacts being experienced by sensitive receptors or at least restrict the number of receptors affected. In particular industrial development is deliberately concentrated into industrial estates in order to contain its adverse impacts to a limited area. Industrial units are not scattered across the plan area.

The Tillbridge scheme shown below is an example where a scheme's impact is minimised by concentrating the development into a single site. This minimises the area where its adverse impacts are experienced. By contrast the eight separate solar PV sites and BESS that make up the Green Hill scheme does the opposite. It scatters the scheme across 9 sites, and within those sites the panels are not even confined to a single block with Site F alone consisting of 7 distinctly separate blocks.



There are four consequences of the use of multiple sites:

- Receptors would experience the scheme as at least eight separate schemes if not many more
- The area adversely impacted by the scheme is far greater than if it was concentrated on a single site
- The land take is significantly greater than a concentrated single site scheme
- Villages are surrounded by blocks of panels

In our response to the PEIR CPRE expressed the view that because of the multiple sites, it was necessary to assess the internal cumulative impact of the separate sites within the scheme however this has not been included in the DCO.

60-year permission

The 60-year permission requested is a generation longer than the upper limit of 40 years anticipated in NPS EN-3 (para 3.10.56). There are several reasons why it is not in the national interest to commit these sites for even a 40-year permission:

1. Global emissions are increasing making further climate change inevitable and it is essential that there is sufficient flexibility to rapidly react to and mitigating its impacts
2. Solar PV is an evolving technology and it is highly unlikely that even by the time of repowering that a like for like repowering would be possible or represent the best climate use for the site at that time
3. Solar PV is being gradually rolled out within the built environment which could make ground mounted sites unnecessary enabling them to be repurposed
4. New or emerging technologies may render intermittent renewables such as solar PV obsolete
5. The current use of the site is as agricultural land which may be vital to return it to food production in order to bolster food security

Although the UK has made substantial cuts in emissions, global emissions are still rising and in the last year they rose at the fastest rate ever recorded. International support for net zero policies is falling significantly with only 64 countries submitting plans for carbon reductions to the COP30 summit. This makes it very likely that the effects of climate change will increase regardless of any reductions in the UK. It would therefore be irresponsible to unnecessarily commit important resources that could be better redeployed to mitigate or adapt to climate change. In the case of this site, it is very likely that the need for increased food security will exceed the need for the relatively modest amounts of solar generation at some point within a 60-year permission.

Energy generation technology is developing rapidly making it extremely likely that the needs of UK electricity generation system will bear little resemblance to the current vision. It is quite possible that ground mounted solar PV will have been made unnecessary or at the very least greatly reduced by other more reliable and efficient technologies. At the very least it is extremely likely that fewer panels would be necessary to repower the scheme thus allowing part of the site to be released.

The UCL study **Shout from the rooftops: delivering a common sense solar revolution**[1] commissioned by CPRE found that there is an achievable potential for 117GW of solar PV generation to be achieved within the built environment. New housing is now required to incorporate solar PV and companies like Big Solar Co-op are partnering with owners of large commercial buildings to retrofit solar PV systems. Warehouses are also being built as solar-ready in anticipation of their roofs being used for solar generation. If the potential for rooftop generation is realised, additional ground mounted solar generation could exceed the capacity of the grid to absorb its limitations.

It is not possible to predict where technology will be in 10 years' time, let alone 60. Small modular nuclear reactors are likely to be available if not nuclear fusion. Alternatively solar PV could even become substantially more efficient enabling land to be released back for other uses.

It must be remembered that the greatest identified risk from climate change that can be addressed at a national level is the threat to national food security. Natural England and the Climate Change Committee are already raising concerns about this issue which is explored in detail under the Climate Change section of this document below.

Climate change

Introduction

Climate change is a global problem making it important to take a holistic view and not constrain the assessment to the scheme sites. It would be counterproductive to make climate improvements onsite only to cause similar or even greater harm elsewhere as a consequence of the changes caused by the scheme. It is also important to understand the actual benefits of the scheme and not disguise them behind misleading statistics or averages.

Because Solar PV is not a dispatchable form of generation there are limits to how much capacity can be effectively incorporated into the grid. The presence of battery storage that can store a limited amount of power for later release into the grid would be helpful in reducing the problems of balancing supply and demand but because battery storage typically discharges over a period of ½ to 4 hours it cannot be treated as a firm source of supply especially in the winter months when there are prolonged periods of darkness.

Meeting targets

The September 2025 DENZ Solar Photovoltaics Deployment spreadsheet[2] states that 20GW of solar capacity is already deployed in the UK. The Renewable Energy Planning Database[3] only contains statistics for schemes that require planning permission which excludes smaller deployments but even so it provides a good guide to progress towards meeting Solar PV targets.

[1] Shout from the rooftops: delivering a common sense solar revolution, University College London (UCL) Energy Institute [redacted]

[2] https://www.gov.uk/government/statistics/solar-photovoltaics-deployment
[3] https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract

The September update shows the following:

Planning Status	Installed Capacity (MW)
Operational	10,194
Under Construction	2,411
Awaiting Construction	19,768
Application Submitted	12,209
Appeal Lodged	200
Grand Total	**44,782**

This shows that there is a capacity of 12.6 GW schemes either operational or under construction. The capacity including schemes with permission totals 32.3GW. There is a further 12.4 GW in the planning system either with permission or at appeal. Given the 10GW discrepancy between the operational capacities in the two databases it must be assumed that rooftop or other schemes that do not require planning permission account for an additional 10GW of operational schemes.

Although some of the schemes awaiting construction may not be delivered and some of the schemes that are undecided may not progress to construction, nevertheless there would need to be an unprecedented attrition rate for the target to be missed.

The most likely reasons that the targets might be missed are that it may prove impossible to construct all the schemes that are awaiting construction or that the grid cannot be adapted in time to successfully integrate so many intermittent schemes into the grid.

The Climate Benefits of the Scheme

It is important to quantify the actual benefits of the scheme so that they are weighed appropriately in the planning balance. There are three benefits of the scheme: the renewable energy produced, the BESS storage for smoothing differences between generation and demand and the biodiversity net gain.

Generation

The table below sets out the applicant's predicted generation broken down by generation period. However, the averages hide the differences between the amount of electricity generated in midwinter when there is just 7.46 hours[4] of weak sunlight and the far greater amount generated in midsummer when there is 16.51 hours[5] of strong sunlight. Historic data suggests that this could result in a capacity factor of under 3% in December when demand is at its greatest. This means that the average daily output in December could be the same as a 15MW power station.

Generation Data		
	Tracking panels	**Static panels**
Scheme life (60 years)	37.12TWh	34.35TWh
Per year	0.62TWh	0.57TWH
Average day	1.7GWh	1.6GWh
Capacity factor (CF)	14%	13%
Firm equivalent (500MW x CF)	70MW	65MW
December firm equivalent?		15MW

The renewables industry has always used selective statistics to promote their schemes and in our view the "115,000 homes supplied" metric is grossly misleading because it gives the impression that the Green Hill scheme could supply a sizeable town. However, not only do homes only account for only 26%[6] of the national energy consumption, their electricity consumption accounts for just 6% of that total.

The table below lists the number of homes might be considered to be supplied by the output from the scheme as we move to net zero.

Use/generation included	**No. homes**	**Notes**
Current domestic electricity only	115,000	Applicant's claim
Decarbonised domestic electricity	29,900	Electricity replaces all fossil fuels currently used in the home
Decarbonised total energy footprint	6,900	Adding the average share of energy used outside the home
Decarbonised total energy footprint with December output	1,500	Accounting for lower capacity factor in winter but not higher demand

The different ways of approaching the "homes supplied" statistics delivers hugely different results.

Contribution of BESS

BESS generally discharge over 30 mins to 4 hours when called upon. It is generally considered that the primary use of a BESS is for electricity arbitrage – taking excess generation from the grid at times of low demand and selling it back at times of high demand. Although this provides a useful function within the grid, it does not in combination with the solar PV make the scheme a firm source of electricity especially during the winter months.

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[4] [redacted]

[55] [redacted]

[6] Energy consumption in the UK 2023 Dept Energy Security and Net Zero

Biodiversity Net Gain

Land used for intensive food production is necessarily low in biodiversity and so it is not difficult to create a net gain by taking it out of use. The BNG benefits of the scheme do provide additional diversity and habitat on site. However, the question arises as to how the food production currently produced across the site would be replaced. If it is replaced by converting biodiverse land elsewhere into use as farmland for intensive food production, then the onsite net gain could well be outweighed by the loss at the replacement site.

The Climate Disbenefits of the Scheme

Reduction in food security

The land proposed to be taken for the scheme is 3,000 acres (1,200 hectares) of prime agricultural land, 2/3 of which is BMV with the remainder being classified as Grade 3b. An additional 415 acres (168 hectares) for the 31Km cable corridor. Rather than preserving current levels of food security, the scheme reduces it.

Although the UK has made substantial progress in reducing carbon emissions, in 2024 global emissions rose at the fastest rate since records began[7]. It would therefore be grossly irresponsible for the government to fail to prepare for the predicted impacts of climate change because they are seemingly inevitable. The Climate Change Committee (CCC) are raising concerns that too little is being done to adapt to climate change and have written to the government[8] advising them that:

> *"It is clear we are not yet adapted for the changes in weather and climate that we are living with today, let alone those that are expected over coming decades."*

They go on to stress that:

> *A well-adapted UK should deliver a future where:*
>
> *….*
>
> *• The UK's food security is preserved and key goals for environmental improvement and support for nature are delivered, despite a changing climate*

Increased transport emissions

Local food producer Weetabix proudly seeks demonstrate that they are minimising food miles by sourcing its wheat locally including from land that will be lost to the scheme. In fact, evidence of this is shown in the winter photograph of Viewpoint 3W where a Weetabix banner is included in shot. The land will not be available if the DCO is made creating additional carbon costs when replacement supplies have to be transported from a greater distance.

The network of bridleways and footpaths across the different sites is currently widely used for recreation. Even though the network will not be reduced, the industrialisation of the routes would cause current users to travel to more distant rural sites. Instead of walking from their villages on the local footpath network as they do now, they will take car journeys to travel to more attractive and tranquil locations creating another carbon cost.

[7] [redacted]
[8] [redacted]

Potential Release of Sequestered Carbon and loss of biodiversity

Since there is no less demand for food, the food currently produced onsite will have to be grown elsewhere. This is likely to result in land currently not used for food production being ploughed up releasing sequestered carbon and reducing the biodiversity at the replacement site. If the replacement food is imported then there will be substantial carbon costs incurred in transportation.

Landscape and Visual Impact

Introduction

There are six areas where we have concerns with the way in which the LVIA has been produced and the way it has assessed change:

- the methodologies used to assess sensitivity and harm
- the representative viewpoints used
- the limited visual modelling
- the weight given to screening
- the weight given to impacts on local receptors
- inadequate assessment of sequential cumulative visual impact

We are also disappointed that the applicant has not included some of our responses to the PEIR regarding the LVIA assessment.

It has also been difficult to assess the LVIA within the DCO. In part this is understandable because it effectively deals with the equivalent of 9 separate schemes; nevertheless, we feel that it could have been presented in a less disjointed way. At ISH1 we discovered that we were not the only consultees who had found the LVIA documentation extremely difficult to navigate. The LVIAs for other schemes that we have assessed have not been as disjointed and complex. Even viewing the LVIA photomontages has been difficult because no physical copy of the DCO has been made available for public inspection.

LVIA Process and Methodology

While reading the grids which list the criteria by which the qualities of the landscape and the impact of change are listed as High, Medium, Low and Very Low, we felt that these set the bar unusually high when judging landscape value and unusually low when assessing the extent of harm. We wondered whether different criteria were used for NSIP applications and so we compared a Green Hill grid with one used in the LVIA for the Tillbridge DCO and found that the Tillbridge criteria set different thresholds. This can be seen in the different tables below.

Tillbridge Table 1-1: Landscape Value Criteria

Classification	Typical Criteria Descriptors
High	A landscape with elements of national or regional designation / importance and / or which is characterised mainly by positive characteristics and/or rare features.
Medium	A landscape with elements of local or neighbourhood designation / importance and / or a landscape with some positive characteristics and/or distinctive features.
Low	A landscape with elements of community designation / importance and / or commonplace features and / or few positive characteristics.
Very Low	Landscape with weak or discordant elements and characteristics that detract from the quality of the area.

Green Hill Table 8.1.1.3: Landscape Receptor Value

Landscape Value	Recognition	Features / Quality	Condition
High	Typically, a landscape / feature of international or national recognition e.g., World Heritage Sites, National Landscapes, National Parks, Scheduled Monuments and Grade I and II* Listed Buildings, Registered Parks and Gardens	A strong sense of place with landscape / features worthy of conservation; absence of detracting features.	A high-quality landscape / feature; attractive landscape / feature; exceptional landscape with a strong strength of character.
Medium	Regional recognition e.g., Conservation Areas; Grade II Listed Buildings, Registered Parks and Gardens	A number of well distinguished features worthy of conservation; evidence of some degradation and occasional detracting features.	A good quality landscape / feature with some potential for substitution; a reasonably attractive landscape / feature.
Low	Undesignated, but locally valued landscape / features	Few landscape features worthy of conservation; evidence of degradation with some detracting features.	An ordinary landscape / feature with high potential for substitution; quality that is fairly commonplace.
Very Low	Typically, an undesignated landscape / feature.	No landscape features worthy of conservation; evidence of many detracting features.	Very low quality landscape / feature with very high potential for substitution; limited variety or distinctiveness; commonplace.

Representative Viewpoints

At ISH1 we have raised our concerns with the way in which viewpoints were agreed. When the LPAs agreed the viewpoints they were not aware of the proposed layout of the panels and chose locations that they anticipated would experience the greatest impacts based on the assumption that panels would be present in the foreground close to the red line boundary of the sites. In many of the viewpoints panels are excluded from the foreground and so the viewpoints do not serve the purpose that the LPAs had intended. It is therefore not safe to rely on the assessment of these viewpoints as being of the greatest impacts of the scheme.

Even looking at other viewpoints, we see cases where the full impact of the scheme is not demonstrated. This is common when developers persuade LPAs to accept a single viewpoint that serves two purposes but in doing so the viewpoint does not show the full extent of the impact. An example within the LVIA is Viewpoint 1 (Lamport Hall) which is not taken from the entrance to the house or from the first-floor function rooms, but from a footpath in a largely unvisited part of the gardens. The footpath is at a lower level than the house and near to a hedge that obscures much of the view. All visitors to the house enjoy the view as they leave from where the hedge is barely noticeable. The photographs below show that the house is at a higher level that the garden.

Limited Visual Modelling

We are very surprised by the lack of visual modelling and that so few of the viewpoints have photomontages or even wireframes that indicate the location and extent of the infrastructure. We are also surprised that where there are photomontages, they do not model the mature site in winter when the screening is not in leaf and may not effectively screen the scheme. This does not present the worst case scenario as would be expected under the Rochdale Envelope.

In most cases the impacts are not modelled but there is an indication of the horizontal extent of the view that would contain infrastructure. This is of little value when assessing the impact unless it is assumed that the infrastructure would fill the view. There are some viewpoints that only have photographs making it particularly difficult to assess the likely impact.

We are also concerned that the medium distance photomontages represent the panels as solid dark grey areas. This would only be an accurate depiction if the panels were directly facing the viewer on a dull day. We noted that in ISH1 the applicant said that panels were represented at full tilt because this is the worst case however in our view, this can be the best case in terms of visual impact. The industrial nature of panels is far more apparent when they are viewed from the side or rear and when viewed from the side when they appear as rows of grey stripes within views.

We consider the poor level of visual modelling and lack of modelling of the 15 year winter views to seriously compromise the ability to assess the impact at the viewpoints and question how the applicant could make a fair assessment without more information.

The Weight Given to Screening

The LVIA is heavily reliant upon screening to mitigate the adverse impact of the scheme and suggests that once mature it would have a beneficial impact on the landscape. This downplays almost a generation during which the screening has not become fully effective and fundamentally fails to understand the character of the Northamptonshire countryside and what constitutes its most attractive attributes. There is also an over-reliance on the effectiveness and durability of the screening.

The 60 year permission being sought should not tempt the assessment of its impacts to be judged solely on its mature impact. The proposed screening would only reach maturity after 17 years from the start of construction and during this period the scheme would be clearly visible as an industrial intrusion in the countryside. This is a considerable period and substantial weight should be given to how long the communities are being asked to accept the impacts on their environment.

The scenic beauty of Northamptonshire comes from its rural nature and the way in which its undulating topography offers elevated locations where there are open and expansive views over the patchwork of fields and river valleys. These characteristics are recognised in the NCA descriptions for the area which also recommends their preservation. The openness of the landscape is essential to its character and the proposed screening would be seen as a detractor because it encloses the landscape and interrupts views.

The effectiveness of screening to mask the development is also overstated because of a failure to recognise that in an undulating landscape, receptors that are not in close proximity to screening would often find themselves looking over the screening and having clear views of the fields of panels behind. A good example of this is the Irchester solar farm that is plainly visible above its screening.

Even where there are not views over the screening the LVIA assumes both that the screening will establish successfully and not be lost to disease, fire or the plants reaching the end of their natural life before the scheme is decommissioned. It also assumes that the screening will be sufficiently dense in winter to obscure views through the screening which we consider unlikely.

Because of all the uncertainty perimeter screening should only be considered as mitigating the adverse impact and not as a reliable means of concealing the industrial nature of the scheme. It should certainly not be considered to be beneficial because it inhibits the openness that characterises the landscape and which the NCA assessments state should be preserved.

The Weight Given to Local Receptors

In our General Comments we observed that impacts upon the local communities appear to be downgraded within the methodology. We feel that this is the case within the LVIA assessments. A clear case in point is the decision to only assess A roads for sequential cumulative impacts.

There is little consideration of the impacts on the communities that would find themselves living in a landscape that is scattered with solar schemes.

Unanswered PEIR Comments

The appendix **GH5.8_CR Appendix_Statutory Consultation Section 42 and Section 44 Applicants Response** lists comments raised in response to the PEIR and the applicant's response. While we are disappointed by many of the dismissive response, we are more concerned that they omit three of the concerns that we raised.

Avoiding Local Vegetation

When we were reviewing the photography provided with the PEIR we observed that in some localised vegetation obscured part of the view and commented:

> *"… it is very concerning that local vegetation often hides the impact raising suspicion that the precise viewpoint has been chosen to under-represent the impact rather than to illustrate it. In such cases best practise states that the viewpoint should be relocated."*

Best practice states that where there is localised vegetation or other localised foreground clutter the viewpoint should be adjusted so that it does not interfere with the view.

Showing Information in Context

In many cases in the DCO it is unnecessarily difficult to correlate information that is needed to understand whether items such as representative viewpoints are appropriately chosen. We suggested:

> *"The DCO should include a map of the viewpoints overlaid on an augmented ZTV diagram (Figure 7.9.3.1) to demonstrate their suitability."*

Such a map would instantly show whether the viewpoints would be expected to have views of the scheme instead of requiring the reviewer to try to accurately locate viewpoints on a ZTV where the underlying map details are largely obscured. This disjointed approach is common in the DCO with another example being that the representative noise monitoring locations and the noise sensitive properties are shown on separate figures.

Restricted Study Areas

We also expressed our opinion that the proposed extent of the different study areas were unduly restricted and presented our concerns in the table below.

Proposed	**PEIR**	**Comment**
0.5km	A Study Area of 0.5km is proposed from the outer boundary of the Cable Route Search Area. The 0.5km radius is considered appropriate for the Cable Route Search Area, since this involves the construction phase only, which is considered short term and temporary. All Landscape and Visual receptors within this Study Area will be assessed.	The cable routes will have a significant adverse impact during the construction phase but even when they are back-filled there will be an ongoing visual impact if they remain protected. In this case cable routes will remain visible as corridors within the landscape which will be notable to those within the landscape and in distant views from elevated locations such as those that show as having over 50% visibility on the augmented ZTV (Figure 7.9.3.1)

Proposed	PEIR	Comment
1km	This is the 1km area extending as a radius from the outer boundary of the Sites Green Hill A to G and BESS focusing on impacts upon both Landscape and Visual receptors.	The visual receptors will experience views of the sites and the BESS from well beyond 1km proposed especially those enjoying the countryside on PRoWs, for example when they are using elevated routes such as the Three Shires Way. The size, scale and extent of the scheme are such that it has the potential to significantly devalue the enjoyment of sensitive receptors that are within this radius or are participating in activities beyond this distance. A comparative example is that of the Didcot power station which, before its recent destruction, was an unwelcome and incongruous industrial intrusion that was a significant detractor affecting many miles of the elevated Ridgeway long distant footpath.
2km	This is the 2km area extending as a radius from the outer boundary of the Sites Green Hill A to G and BESS.	Other local 49.9MW schemes have used a minimum 5km study area. This is unduly restrictive.
5km	This is for the area extending as a radius from the outer boundary of the Sites Green Hill A to G and BESS focusing on impacts upon landscape receptors only.	For the reasons given above for the 1km boundary above, this distance is inadequate where visual receptors experience views from elevated locations.

We are disappointed that the applicant has not responded to our concern and remain of the opinion the there are cases where the study areas are too restricted. A clear case in point is considering sequential cumulative impact where the existing solar schemes at Irchester and Great Doddington/Wellingborough are not assessed.

Sequential Cumulative Impact

We are very disappointed that despite the concerns that we have raised in response to the PEIR the applicant has not adequately considered or assessed the sequential cumulative impact both of the different components of the scheme and of the scheme with other renewables schemes that would be encountered on common journeys through the landscape.

The ES suggests that Sequential Cumulative Impacts need only be considered on A roads, and contends that journeys on minor roads need not be assessed. We feel that this is unacceptable because it excludes the most common impacts experienced, that of those that reside within the local landscape and experience the impacts in their daily lives.

Even when considering the impacts on A roads the assessment is inadequate and so constrained that it does not represent a realistic local journey. When considering sequential impact on receptors travelling through the countryside it is not necessary that they should simultaneously experience views of detractor elements but to consider whether a receptor would repeatedly encounter views of detractors along their journey such that they have remembered views of the previous detractor(s) when encountering the next detractor.

A Road Journeys

The ES assesses the A509 as a route on which sequential impact would occur, but it so tightly constrains the assessment that it omits the existing schemes that a receptor would encounter on a realistic journey. The A509 is a busy route that connects Wellingborough with Olney, Milton Keynes and the M1.

A509 Milton Keynes and the M1 – Olney -Wellingborough

The most affected stretch would be the 10 mile section of the journey between Olney and Wellingborough. A receptor already experiences significant views of the existing two solar schemes at Irchester and Wellingborough/Great Doddington. The Green Hill scheme would mean that receptors would additionally encounter Site G and then encounter three blocks of Site F which they would perceive as three smaller developments. This would mean that they would perceive that they had passed 6 solar schemes within in a 10 mile section of their journey.

The longer route is also bracketed by more distant views of the Milton Keynes wind farm at Petsoe End and the Burton Wold wind farms which could reinforce the impression that a receptor is passing through a landscape that is dominated by industrial scale renewable developments.

An important thing to note on this route is that the landform undulates significantly meaning that even mature screening would not be effective because receptors would see over the perimeter screening and experience views of the scheme components. The views of the Irchester scheme amply demonstrate the ineffective nature of perimeter screening.

We consider that a receptor would consider that they repeatedly encounter solar schemes along this route and that this would represent a major adverse impact.

Local Journeys

The residents that live within the villages within or close to the scheme have the potential to encounter multiple discrete components of the scheme on a regular basis as they travel within their landscape in order to access work, services or for leisure. Perhaps the most common routes would be those that take residents to the major centres such as Northampton, Milton Keynes, Wellingborough and Bedford.

In rural Northamptonshire countryside it is common that there is not a logical route between destinations along the main road network making it necessary to use local roads for some or all of a journey. Satnav systems frequently route drivers through local roads in such cases. The local roads are also used in preference to the main roads both to avoid congestion during rush hour and for the pure enjoyment of travelling through attractive countryside. The latter use would of course cease should the DCO be made and the countryside no longer be attractive.

In the spirit of applying the Rochdale Envelope a worse case route might be the journey that I use to attend CPRE meetings which are held at Lamport Hall.

Bozeat to Lamport Hall

This route not only illustrates where main roads frequently do not offer a direct route between destinations but serves as an example of how receptors on local journeys would encounter multiple elements of the scheme.

The 17 mile route from Bozeat passes through Easton Maudit, Grendon, Earls Barton, Mears Ashby, Holcot, and Walgrave before reaching Lamport Hall. It would encounter most elements of the scheme in succession: travelling alongside a block of Site F near to Bozeat, between two blocks of Site F beyond Easton Maudit, alongside the BESS, alongside Site E, past views of Site D, Site C, Site B, Site A.2 and Site A. The only component of the scheme that would not be experienced would be Site G.

Clearly any receptor travelling on this route would experience a major adverse impact over the length of the route.

LVIA Conclusions

We have significant concerns about the LVIA submitted with the DCO. We feel that there are significant flaws in the way in which it has been prepared which result in some impacts being understated and others not being assessed at all.

We feel that it is important to place significant weight on the impacts that would be experienced in the many years before the mitigation is effective and not to dismiss what may well prove to be over half of the schemes operational period if the repowering does not take place.

Ecology

Ecology is not one of our core areas of expertise however we are concerned about the impacts of the scheme upon the current wildlife populations and the risk posed to the Upper Nene Valley Gravel Pits SPA and RAMSAR site.

One of the greatest joys when walking on the PROWs through the tranquil Northamptonshire countryside comes from observing the wildlife that can be seen in the open landscapes. There is a variety of bird species that can be seen and heard but also deer, hares and foxes. We are concerned that the disturbance during construction of the scheme and the change in the nature of the sites once constructed will either displace the resident wildlife, remove the habitat that they rely upon or, in the case of deer, prevent them from accessing the sites.

The potential impact upon the Upper Nene Valley Gravel Pits SPA and RAMSAR site is twofold. There is potential for contamination in the event of a BESS fire and of the loss of Functionally Linked Land upon which the birdlife currently depends. Fire in the BESS is addressed elsewhere in this document.

The loss of Functionally Linked Land is significant and when dismissing the appeal against the refusal of the Woodford Lodge Farm solar farm (**Appeal Ref: APP/M2840/W/24/3354297: Land south of Wood Lodge Farm, Thrapston)** it was cited by the Inspector as the overriding consideration in determining his decision to refuse the appeal. The Wood Farm Lodge appeal site is some distance from the SPA but still lay within the foraging area.

Cultural Heritage

Because of the distributed nature of the scheme, the conservation villages of Easton Maudit, Grendon and Mears Ashby would find that instead of being surrounded by open countryside, they would be set among significant areas of solar panels. Although the scheme allows a panel-free

buffer providing some separation for the villages, in our view it would not prevent a significant and adverse impact upon the setting of these villages because of the remembered views of the industrial scale solar panels that would be experienced on the approach to the villages would change the perception of the villages from being attractive villages within the open countryside to being a village set within an industrialised landscape.

Easton Maudit would be particularly impacted because it would find itself surrounded by fields of panels on all sides and could only be approached by road or on a PROW by passing alongside or even through fields of industrial scale PV panels. The particular sensitivity of this village and its setting within the open countryside is recognised in Table 4.1 of **The Plan for the Borough of Wellingborough**[9] where Easton Maudit is categorised with the protection status of Restraint Village. This recognises the exceptional sensitivity and value attached to the character of this village. It is easy to envisage this small and tranquil village as a home to a relatively isolated agricultural community in pre-industrial times.

Transport and Access

Most country lanes are well used by walkers, horse riders and cyclists for recreation and exercise. For many equestrian businesses these quiet roads are a vital resource that is essential to their business. Country roads are also used for recreation by walkers, some on a day-to-day basis but also if the PROWs are too muddy. Horse riders, walkers and cyclists using country roads are of High sensitivity.

Although we note that some routes are recognised as being close to equestrian facilities, we are concerned that not all connecting rides are accounted for.

We are pleased to see that Link 81 has now been recognised as of High sensitivity but note that the applicant disputes the sensitivity of Link 80. We have only found a narrative definition of this link route and there may be confusion over where this route starts. The narrative implies that it starts in Bozeat at the junction with London Road but from the applicant's response it may be that it starts at Access F.2. However this road is currently used by walkers and its sensitivity should reflect that use.

In our PIER response we expressed the view that traffic should not pass through villages. At ISH1 the applicant admitted that Access F.2 is connected by an internal track to Access F.3 meaning that it is not necessary to use Link 81. We therefore feel that the use of this High sensitivity route cannot be justified and should be deleted from the scheme.

Noise

In our response to the PEIR consultation we raised a number of concerns about the Noise monitoring and the lack of evidence that we would usually expect. EIA noise studies usually show photographs of the monitoring equipment in situ to demonstrate that it was not located next to extraneous sources of noise such as vegetations or water courses. We are also used to seeing an appendix containing the raw data that was collected correlated against the weather conditions demonstrating that data was excluded when it would be unreliable because of noise created by rainfall or wind affecting the equipment.

[9] https://www.wellingboroughtowncouncil.gov.uk/wp-content/uploads/sites/138/2023/05/The_Plan_for_the_Borough_of_Wellingborough_-_Adopted_26-02-2019.pdf

We also raised specific concerns about the siting of the "representative" noise monitoring locations at LT23 and LT24 which are by busy A roads unlike the noise sensitive properties that they are supposed to represent. This would have been readily evident had the locations of the monitoring locations been shown on the same figure as the noise sensitive properties as we would normally expect. The background noise levels recorded will not represent the background noise at the properties.

We also questioned the noise modelling using a ground absorption factor of G=0.8 (soft ground). This is concerning because during summer months and periods of frost the ground will be hard. This is inconsistent with best practise and the Rochdale Envelope approach which would require the lower absorption rate from hard ground conditions to be assessed. We find the applicant's response on this matter in (**GH5.8_CR Appendix_Statutory Consultation Section 42 and Section 44 Applicants Response** p126) very concerning.

Because of these issues we cannot have confidence in the noise monitoring assessments.

Glint and Glare

The concerns that we raised in our PEIR comments about the dangers of glint and glare to equestrians have not been addressed in the response within **GH5.8_CR_Appendix_Statutory Consultation Section 42 and Section 44 Applicant Responses pages 126-128**. While it may be correct to say that riders are receptors who would be tolerant to change, this is certainly not true of horses who are herd animals and are extremely intolerant to any change that they might interpret as a threat.

Horses are unpredictable and prone to rear or bolt at the slightest thing. Glint is likely to be the most dangerous of the two hazards but sudden glare when clouds cover parts could also result in a horse bolting and endangering its rider.

The response to our PEIR comments also contains the suggestion that *"screening is expected to obstruct the line of sight between receptors along public rights of way and bridleways"* is disingenuous. A common theme within the DCO is that screening will hide the scheme; this fails to account for the following:

- screening will not be fully matured for 15 years
- after leaf-fall screening is unlikely to prevent views through the screening
- screening is ineffective in an undulating landscape and
- there are PROWs where it is proposed not to plant screening.

The response to our concern that *"Local roads are more likely to have slow moving farm vehicles, cyclists, pedestrians and horse riders that drivers need to avoid and that could result in a collision should a driver be temporarily blinded by glint or glare. They are thus more affected than major roads where traffic conditions are more uniform and predictable"* is inadequate. It states that *"as per the Highway Code, road users should be prepared for conditions in which glare could be produced"*. Rather than simply passing responsibility to drivers, the assessment should acknowledge that an additional and completely new type of hazard would be introduced which should be assessed as increasing the risk.

Air Quality

We welcome the change from the PEIR in that that DCO no longer implies that a fire in the BESS would only last for a few hours. However, the only data presented is of one-hour emissions and no consideration is given to the possibility of a fire that lasts for days. If this occurs during a windless period or a temperature inversion the harmful gasses will not be dispersed by the wind.

Although the evacuation of residents is one of the measures that may be necessary in the event of a BESS fire there is no suggestion of how this would be supported for the duration of the fire. Before making the DCO it should be demonstrated that there is a credible evacuation plan detailing how many residents would need to be evacuated and where they could be accommodated.

Toxic fumes are not only harmful to humans and there needs to be consideration of how this might affect horses and livestock. Although we very much doubt that the solar farm would to be used to graze sheep, if grazing was to take place, then the sheep would need to be evacuated as well as any horses.

It is not safe to rely on a vague list of measures that might be deployed in the event of a BESS fire. There is insufficient detail of the likely scale of the evacuation that might be required or how it might be achieved. The Emergency Response Plan should be provided and agreed with the local emergency teams before the DCO is made.

Socio-Economics, Tourism and Recreation

Economic Effect of the changes to of PROWs

Although users of PRoWs may not pay to use them, they do contribute to the local economy by making use of local hospitality and other services. During construction the PROWs would be subject to disruption and after construction the mitigation would take another 15 years to mature. The industrialisation of the countryside would make it unattractive to use the PROWs and deter visitors. Although we acknowledge that after 15 years the mitigation would be mature, this would only make the scheme less unattractive and not restore the open and expansive views that are the primary attraction for many of the walks in or near to the scheme.

We consider that users of the PROWs would be deterred from visiting the area and that this would result in an adverse impact upon the local economy.

Effect on employment

The businesses most at risk from the impacts of the scheme are the agricultural businesses that either directly farm the 3,000 acres that would be taken out of production, downstream or upstream agricultural support businesses and tourist and leisure businesses that depend upon the current pleasant and attractive countryside, PROWs and bridleways and quiet country roads to attract and retain clients.

The applicant acknowledges that during construction the majority of the employment would be from inbound contractors and suggests that around 25% could come from the affected communities. We consider that this is optimistic because generally contractors use their own skilled workforces. Regardless, this employment is temporary and is unlikely to have any lasting benefit to the economy of local communities.

It is of great concern that **Table 17.16: GVA per Annum as a Result of Scheme Construction** shows a loss of 41 FTE jobs in Agriculture and Tourism during construction and **Table 17.17: Long-term FTE Employment per Annum as a Result of Scheme Operation** shows only 8 FTE jobs during the operational phase.

Although we are far from convinced that as few as 12 direct or indirect FTE jobs would be lost in agriculture, this alone exceeds the number of FTE jobs created during the operational phase of the scheme. We are similarly doubtful that the loss of jobs in Tourism and Leisure would be as low as 29 FTE jobs, but even this figure is significant within a rural economy.

The employment figures in **Table 17.19: GVA per Annum as a Result of Scheme Operation** suggests that the agriculture jobs losses would be a permanent but suggests that tourism would regain 19 of the lost jobs which we do not consider to be credible. The USP for tourist businesses is the attractive countryside that will no longer exist after construction. It is not impossible that a few tourism jobs may return after the construction disruption ceases however, it is highly likely that a significant number of current businesses would not survive the hiatus in their income stream during construction. Some businesses have anyway decided that they would not survive the loss of attractive countryside upon which they market their business because it would render their offer unattractive and announced that they intend to close or relocate out of the area should the DCO be made. Others tourism businesses that try to continue trading would be likely to find that their offer is so diminished that they fail to attract sufficient custom to survive.

While we acknowledge that there would be substantial levels of employment created during the construction of the scheme however, this would be temporary in nature and almost irrelevant to the local economy in the proposed 60-year duration of the scheme. On the other hand, the scheme would cause a loss of existing local employment that in rural communities amounts to a significant loss.

Economic Effect on Local Economy

Table 17.16: GVA per Annum as a Result of Scheme Construction shows an annual loss of £2,153,000 due to impacts on Agriculture and Tourism during construction. We consider this to be largely irreversible as we have argued above. Even if, as suggested by the applicant, 19 of the FTE jobs in tourism would be recreated once construction is complete, this still shows an annual loss of £1,064,000 due to impacts on Agriculture and Tourism.

It is suggested that these losses would be offset by ground rent and the employment of 8 direct or indirect FTE jobs to support the scheme. While we agree that the ground rent paid to owner-occupier has every chance of entering the local economy, we strongly contest the suggestion that the ground rent paid to absentee landowners would provide a significant benefit the local economy.

It is our view that the scheme would result in both a net loss to the local economy and the net loss of local jobs. It is hard to justify the social cost of the net loss of employment when the primary benefit of the scheme would accrue to a few largely absentee landowners.

Human Health

Mental Health and Wellbeing

The Green Hill proposal has already had an adverse impact on the health and wellbeing of the communities that live within or in close proximity to the sites that make up the scheme. They have suffered stress and depression because they are dreading the prospect of what they fear will be forced upon them. The prospect of having to live among a huge construction project for two years followed by living within an industrialised landscape instead of the current rural environment which they treasure is understandably depressing.

We agree with paragraph 18.8.17 of GH6.2.18 that:

> *The likely effect on community identity and culture is based not only on direct visual impacts within the settlements themselves, but on surrounding PRoWs and transport routes as experienced by users, and the perception of changes to the immediate character of the land surrounding these identified settlements as a result of the Scheme's construction.*

However, while we agree that the impact of the Scheme on community identity and culture and thus on the mental wellbeing of the population is likely to be negative, we do not agree that the impact would be low in magnitude. In part this is because we feel that ES Chapter 8 underrepresents the adverse visual impacts of the scheme but primarily because we understand how important it is to the wellbeing of rural residents that they live within a pleasant rural environment.

Being Active in the Open Countryside

The PROWs and rural lanes are a major recreational resource for rural communities. They provide a high quality environment in which to take leisure on foot, on horseback or by cycling. Residents can simply walk or cycle into the countryside from their homes where they can enjoy open countryside views in peace and tranquillity and observe nature. The beneficial health outcomes derived from these activities are not the aim of these activities but they are an important by-product of them.

The scheme would industrialise significant sections of the well-used local routes by introducing industrial scale solar panels and noise from the electrical infrastructure associated with them. Over time the screening would interrupt the open views that provide highlights of a route and the incentive to use routes would diminish. The net result would be that residents are deterred from taking exercise in the countryside with a consequential adverse impact on their health.

Agricultural Circumstances

National Planning Policy

The following paragraphs from NPS EN-3 address the use of agricultural land for solar farms:

3.10.8 Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres.

> *3.10.13 Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.*
>
> *3.10.14 While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of "Best and Most Versatile" agricultural land where possible).*
>
> *3.10.15 Whilst the development of ground mounted solar arrays is not prohibited on agricultural land classified 1, 2 and 3a, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.66 – 2.10.83 and 2.10.98 – 2.10.110.*

3.10.16 It is recognised that at this scale, it is likely that applicants' developments may use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land.

3.10.14 While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of "Best and Most Versatile" agricultural land where possible).

3.10.17 Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, or storage) to maximise the efficiency of land use.

3.10.19 Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring 60% of England's agricultural soils into sustainable management by 2030.

Wasteful Use of Agricultural Land

The proposed scheme has a total land take of approximately 3,000 acres of agricultural land of Classes 1 to 3b which the applicant acknowledges that 70.6% of the land is BMV. The figures in Para 3.10.8 of NPS EN-3 suggest that a 500MW scheme would be expected to require 1,250-2,000 acres of land. It is clear that not only does the scheme fail to avoid BMV land, it also consumes far more land than is considered necessary to achieve 500MW of generation and associated infrastructure.

The Sunnica 500MW scheme uses 500 acres less and although the Tillbridge scheme has a similar land take it will generate 700MW or 40% more output. It is clear that the Green Hill scheme does not use the land efficiently.

We note that the applicant suggests that this is not significant by expressing the land take as a percentage of the UK's total utilised agricultural land area – a figure that bears no relation to the national resource of arable land let alone BMV.

Continuing Agricultural Use

Like all solar farm proposals, the applicant states that the land could remain in agricultural use through grazing. In our experience it is extremely rare for this to take place. At ISH1 it was clear that the applicant does not have any arrangements in place to guarantee grazing and so under the Rochdale Envelope it must be assumed that grazing would not occur.

A significant omission when considering landholding is that it only considers the impact upon the landowner and does not consider the impacts on tenants. Substantial amounts of land are being removed from tenant farms which will significantly impact their business and it is likely that some residual holdings will no longer be viable businesses. This issue should be addressed and the results fed into the socioeconomic impact of the scheme.

Effect on Soil Condition

The applicant states in 20.8.21 that there is a potential for the soil ALC to be improved as a result of the scheme. This is in stark contrast with the Inspector's and Secretary of State's conclusion in the decision at Blackberry Lane, Pembrokeshire (file ref: DNS/3245065). Paragraph 39 of the SoS decision states:

> *The Inspector notes the applicant's contention about the potential impact of the development and the suggested conditions, however considers the structure of agricultural soil is fragile and easily damaged and the construction of a development of the scale proposed is likely to result in a substantial amount of ground disturbance across the application site. This disturbance would arise from the engineering operations necessary to construct a solar park of the scale proposed and from the potential for widespread soil compaction caused by the movement and use of heavy vehicles and machinery required for the installation of the supporting posts and the excavation of trenches, access paths and foundations across the site. The Inspector is of the view the impact of these operations and the nature of the vehicles and equipment required are not comparable to agricultural practices and are likely to significantly damage the structure of the soil and result in the loss of BMV agricultural land. (IR164-165)*

The photograph below shows the impact of construction at the Irchester solar farm. This certainly gives significant credence to the conclusions of the Inspector in his Blackberry Lane decision

Major Accidents

A BESS fire is the most likely major accident that could occur as a result of the scheme. Although such incidents are uncommon, their likelihood increases in proportion to the number of battery units and the length of time that they are in place. The proposed BESS for Green Hill would be one of the largest in the UK and it is proposed to be in place for 60 years. In combination this makes the probability of a fire far greater than that of smaller sites. There is already one 50MW BESS system in Grendon and permission has been granted for a second one. In total 600MW of storage would be present at Grendon which would mean that the risk of fire would be an order of magnitude greater than at most other sites.

A large BESS could even be a target that is vulnerable to bad actors in our uncertain world.

Toxic Fumes

The DCO contains details of the toxic fumes that would be emitted from a battery fire but given no detail about how these might accumulate or be spread in the course of a fire that would last for days. If a fire was to occur during a temperature inversion the fumes would not disperse and could reach high levels of toxicity.

Firefighting Water Management

Battery fires cannot be extinguished with water and are usually left to burn out. However, in order to prevent contagion to adjacent units, water is used to the cool those units. Fires can last for several days, yet paragraph 5.5.6 of **GH7.7_Outline Battery Storage Safety Management Plan** provides water usage figures for the volume of water that would be used over 2 hours. The Liverpool battery fire lasted for nearly 3 days and it essential that the hydrology assessment should be based on the volumes used over at least 72 hours of cooling and not just the 2 hours figures calculated.

When considering the Firefighting Consequences, paragraph 5.5.5 acknowledges that surface runoff might contain pollutants. A further concern is that the toxic fumes from a fire could be dissolved out of the atmosphere by rain or spray from the cooling water and it essential that it can be demonstrated that this does not escape the site.

Emergency Response Plan

There are major concerns and scepticism within the community about how their safety would be assured in the event of battery fires. We feel that it is unacceptable to make the DCO without first having understood and quantified the risks and consequences of a BESS fire and without public scrutiny of the measures proposed to ensure public safety. A detailed Emergency Response Plan should form a part of the DCO.

A specific concern that should be addressed within the Emergency Response Plan is that in order to evacuate the properties at Pastures Farm (the leftmost pin in the picture below) residents and employees would have to drive towards the fire before they can evacuate. How can they safely be evacuated?

In conclusion, we do not feel that the DCO satisfactorily considers public safety and that it would not be safe to make the DCO without greater assurance that it can be guaranteed.

Other Matters

Community engagement

Consultations

We acknowledge that consultations for unwanted development are seldom easy. However, for this scheme we feel that the applicant has given the impression that their only interest has been to identify potential issues that could prevent them obtaining consent and how they may be bypassed or avoided. It did not help that in the first consultation meeting that we attended that when an upset member of the community asked why were they proposing to do so much harm to their community and way of life, the applicant responded by saying bluntly it was because the planning system would allow them to do so.

This lack of engagement is also frequently evident in the applicant's responses to consultees in the Consultee Response tables (**GH5.x_CR_Appendix xxx**) where concerns are not addressed in a considered response but are either merely "Noted" or brushed aside with a statement like:

> *"The Applicant acknowledges these comments but remains confident in the level of consultation undertaken and information presented throughout the targeted consultation, as described in the Consultation Report **[EN010170/APP/GH5.1]**."*

Accessibility of information

We appreciate that the scheme is of a size and scale that exceeds anything that even CPRE Northamptonshire has previously encountered. However, it has felt throughout that information has either been presented in an unnecessarily disjointed and inaccessible manner or in some cases information is simply not supplied. A consequence of the disjointed documentation is that individual documents are littered with long cross-references which make them much more difficult to read.

At ISH1 we were relieved that the consultant acting for SGHS had also found that the disjointed presentation of the LVIA documentation made it very difficult to work with and requested that that applicant should supply an index to help navigate the large volumes of separate documents. We soundly endorsed their request and are pleased to see that the Examining Authority has recently followed this up with the applicant. However, we are very disappointed that to date the applicant has only offered an online orientation meeting on 10th November to guide us through the information. This is after Deadline 1 which means that was of no help in the preparation of this written representation.

Community Fund

It is proposed that the issue of a community fund should be addressed separately to the DCO. We feel that this is unacceptable because we are aware of cases where promised community funding is lost when schemes change ownership. Any community funding arrangement must be guaranteed and the legal duty to provide such funding must transfer to any and every future operator of the scheme.

Guaranteeing Decommissioning and Repowering Funding

There is a significant risk that the scheme will not be decommissioned by the operator at the end of its permission and that it will not even be repowered. Although the DCO will contain a legal requirement for the scheme to be decommissioned, this only guarantees that decommissioning will take place if the final owner has sufficient funds to do so. Unless funds have been accumulated within a ring-fenced bond or account during the operational life of the scheme, then the final owner of the scheme can simply declare bankruptcy and abandon the scheme.

It is also possible, if not probable, that the scheme will not be repowered. There is no guarantee that by the time of repowering, the return on the investment of repowering costs would be sufficient to justify the required investment. It is thus necessary to ensure that decommissioning funds are accumulated prior to the scheduled repowering.

It is also important to include a Requirement for the scheme or any parts of the scheme to be decommissioned within 6 months of it not being operable or of not being repowered when necessary. In the absence of such a Requirement it would be possible that an obsolete or inoperable scheme could be abandoned until the end of the permission and the land not returned to a useful purpose.

Conclusions

We have concerns about whether the content and quality of the DCO adequately and accurately assesses the scheme. Nevertheless, it contains sufficient information for to conclude that the Green Hill scheme fails every test that we set when deciding whether or not a scheme is acceptable.

The assessment against our criteria fails because:

- Due to its scattered nature, we consider that it would not only be widely visible within the landscape, but it could be considered to create a swathe of the countryside in which it would dominate and define the landscape character.
- Although not formally designated the rural character of the landscape across which the scheme would be distributed is deeply rural countryside which could not accommodate the substantial industrialisation proposed.
- The ZTV diagrams indicate that there would be views from settlements but the greatest impacts would be experienced on the PROW network especially on those that pass adjacent to or through sections of the scheme.
- The scheme creates an unprecedented level of impact upon the setting of some villages such that the village would be surrounded by the different sections of the scheme.
- The scheme would take approximately 3,000 acres of BMV land out of food production. This is greater than comparable schemes and approximately a third of the land take will not be used for energy production.
- We consider the noise assessment and modelling to be unreliable and so cannot conclude that the noise levels would be acceptable.
- We have significant unanswered concerns regarding the safety of the BESS installation because of its proximity to residential properties and the village of Grendon as well as the SPA and RAMSAR sites.

It is perhaps useful to summarise some of the significant adverse impacts of the scheme that should be weighed in the planning balance:

- The scheme and its consequential adverse impacts are scattered over a wide area
- Whole village communities who currently enjoy the rural idyll are being asked to accept that their conservation villages should be surrounded by fields of 15 foot high solar panels
- Other village communities are being asked to accept the industrialisation of the countryside within which they live and work
- Residents of one village are being asked to accept the risk of a battery fire and the potential need to evacuate their homes
- A SPA and RAMSAR site is being put at risk of contamination in the event of a battery fire
- 3,000 of BVM land would be taken out of food production reducing food security
- Tenant farmers and part-tenant farmers would lose land necessary to sustain their businesses

- Equestrian businesses are being asked to accept the closure of vital rides during construction and the loss of the high quality countryside rides that are their essential to attracting custom and their business' survival
- Communities are being asked to accept the industrialisation of the PROWs that they currently enjoy and which are important to them maintaining their health and wellbeing
- Communities are being asked to accept fundamental changes to the character of the countryside the quality of which for many is the reason that they chose to live there
- Communities are being asked to accept a reduction in the value of their homes without compensation

The benefits of the scheme that must be weighed in the other scale of the planning balance are the carbon savings from the renewable energy would be produced and the contribution that the BESS would make to balancing the grid. Our analysis of the true extent of these benefits is that they are surprisingly low when considering the scale of the scheme.

While CPRE supports efforts to reduce carbon emissions, we do not feel that the unprecedented extent of harms that the scheme would cause can in any way be justified by the relatively modest contribution that would be achieved by this scheme to addressing climate change. Thus, we recommend that the scheme should be refused and the DCO not made.

CPRE Northamptonshire
Registration identification number: F16E37A6E