



North
Northamptonshire
Council

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Responses to ExA Questions 2

December 2025

PINS Reference EN010170

LPA Reference NW/25/00239/EXT

NNC unique registration identification number F8DE03132

Proposal (summary): An application for a Development Consent Order to construct, operate, maintain and decommission the Green Hill Solar Farm

Location: Green Hill Solar Farm

Q2.1.3 – Updated National Policy Statements for energy infrastructure

NNC Response – No, we consider the 2024 versions should be used.

Q2.1.9 – Community Benefit Fund

NNC Response – NNC notes that the CBF has been put forward as a voluntary benefit by the Applicant. NNC would like to understand, the level of benefit the Applicant's intend to provide? In regard to a mechanism to secure the CBF, NNC consider that it would be to the benefit of the community to secure the CBF as part of the DCO. We suggest that this follows a similar approach to that of Botley West Solar Farm DCO.

The Botley West Solar Farm DCO has secured the CBF where a deed is entered into under section 1 of the Localism Act 2011 (which allows a local authority to do anything which an individual can do, subject to statutory restrictions) and section 111 of the Local Government Act 1972 (which allows a local authority to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions). The deed is entered into between the LPA and the Applicant and will need to be completed before any grant of development consent.

Any deed would have to provide for circumstances in which the Applicant transferred ownership of the project to any other person and for that person to enter into a deed on terms no less advantageous to the LPA.

It is envisaged that the affected parishes would then set up a Community Interest Company (CIC) made up of representatives of the affected parishes (and in conjunction with the Community Liaison Group). Then once the LPA is in receipt of the funds from the Applicant, the LPA transfers it to the CIC which would be the administrator of the CBF. Should the CIC not come to fruition for any reason or be disbanded during the life of the development, the LPA (or successor(s) to their statutory functions) would administer the fund.

NNC consider that this approach is appropriate here.

Q2.10.2 – Noise Assessment for the BESS

NNC Response – The Council confirm that Requirement 17 in Schedule 2 to the draft DCO addresses this point.

Q2.11.4 – Non-designated (built) heritage assets within/outside the Order Limits

NNC Response – Having reviewed the Illustrative Layout Plans (APP-196 & APP-197, and APP-200), NNC are content to agree that the three NHDAs identified (Woodlodge Farm, Hockerhill Farm and Ward's Barn) are outside of the Order Limits.

Q2.13.3 – Mitigation Planting

NNC Response – The Council's position is that hedgerows grown to approximately 4–4.5 metres are not inherently unacceptable, but their influence on landscape character varies depending on location. This height exceeds what is typical across much of the

receiving landscape, where the condition is one of low to moderate enclosure and where open views across farmland form a defining element of the character areas.

The Council's principal concern is not with visual screening itself but with the way taller, more continuous hedgerow structures would alter the established character of certain rural lanes and PRowS. Along parts of Easton Way and Easton Lane, the landscape is currently perceived as open and rural and a relatively simple field pattern. Introducing hedgerows at 4–4.5 metres would noticeably increase enclosure along these lanes and change the way they are experienced, even in places where the solar arrays would not be directly visible.

Similarly, for users of PRow NNITA13, which crosses open farmland, the proposed hedgerow heights may generate a greater sense of physical and perceptual narrowing. While this does not necessarily constitute an unacceptable impact, it represents a clear shift from the existing open character to a more enclosed and managed landscape, and this change is material to how the landscape is understood and experienced.

It is also important to emphasise that the Council does not object to hedgerow planting as a matter of principle. The concern relates specifically to the character implications of taller hedgerows in locations where rural openness is an essential aspect of landscape character. In these locations, tall hedgerows would deliver effective screening but would also introduce a different character outcome that should be weighed in the assessment of long-term effects. This is why the LIR highlights hedgerow height as a relevant consideration.

Q2.13.4 – Cumulative Impacts

NNC Response – The Council has considered the Applicant's comments but remains concerned that the magnitude and duration of operational landscape effects continue to be understated. The Applicant places weight on the dispersed layout of the scheme, suggesting that because the sites are spatially separated, solar development will not form a defining characteristic of the surrounding landscape. However, this does not reflect how landscape character is assessed or experienced at broader scales.

The Council notes the Applicant's statement that the Scheme's dispersed layout prevents it from being perceived as a cohesive whole. This may be true in visual terms, but landscape character is not determined solely by what can be seen from individual viewpoints or locations. Within Northamptonshire, and specifically across the Sywell Plateau, the majority of Sites A, A.2, B, C, D and most of E all lie within the same landscape character area. Although these sites are physically separated, together they form a substantial proportion of the Plateau. When considered collectively, the replacement of large areas of agricultural land with energy infrastructure represents a materially significant change that redefines the character of this part of the county. The fact that the sites are not physically connected does not diminish the extent of land-use change. Instead, it spreads the influence of the development across a wider area. Dispersal does not reduce the effect on character, instead it could be seen to broaden the area in which those effects are experienced.

The Applicant's reasoning that solar development is simply "overlaid" on the landscape and is therefore less transformative is also noted. However, land use is itself a tangible component of landscape fabric, and the replacement of agricultural activity with electricity generation represents a clear shift in the landscape's fundamental function and appearance. Even if hedgerows, trees and watercourses are retained, the defining change of land use for more than half a century does not negate this.

The Applicant also continues to emphasise how the scheme will be "perceived," implying that if views are screened or filtered, the influence on landscape character will be minimal. As previously stated, the Council does not agree that landscape character is determined primarily, by visibility. Character arises from the tangible and intangible attributes of the landscape, including land use, management, landform, landscape features and perceptual qualities. The introduction of solar arrays, fencing, substations and associated infrastructure represents a material change to the landscape fabric. These components influence character irrespective of whether they are visible from viewpoints.

For these reasons, the Council maintains that the operational effects on landscape character, particularly when considered cumulatively across sites, would be slightly more adverse than the Applicant has judged. This is a matter of degree rather than a fundamental difference, especially as the Applicant already identifies adverse landscape character effects within the 1 km, 2km and 5km study areas. The Council's view is that, given the extent of land-use change and the distribution of sites across areas, the cumulative influence on landscape character would be slightly greater than reported. Mitigation will help reduce impacts by Year 15; however, the underlying change in land use and the associated character effects continue for the duration of the Scheme and remain adverse.

Q2.13.7 – Local Character Variations

NNC Response – From the Council's perspective, the Applicant has prepared a baseline assessment that makes appropriate use of established landscape character studies and divides the study area by individual sites. As such, the Council agrees that the baseline information is generally sound and suitable as a foundation for assessment.

However, while the methodology is accepted, the Council remains of the view that certain local variations in landscape character have not been given sufficient weight in the subsequent judgements regarding value, susceptibility, sensitivity and magnitude of change for each site. These variations relate to differences in landform, settlement context, rural experience and the ability of each site to accommodate a change in land use.

For example, Site F exhibits more noticeable topographic variation than many of the other sites, resulting in a landscape where changes in land use are more readily appreciable within the wider character area, even if the effects are not always visually prominent from public viewpoints. In contrast, Site E, while not visually exposed due to the absence of PRoW, nonetheless has a clear and established relationship with surrounding farmland, meaning that a shift in land use from agriculture to energy infrastructure would still alter the character of that area in a meaningful way.

The Council therefore considers that although local character variations have been recognised within the ES, they have not always been carried through with sufficient influence into the final judgements. This is not a disagreement with the method used but rather a difference in professional judgement regarding how localised nuances contribute to overall sensitivity judgements and the magnitude of change.