BOZEAT PARISH COUNCIL

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

PINS ref: EN010170

Feedback on Applicant's responses by Bozeat Parish Council (F7D1F5580)

Deadline 3 17th December 2025

Introduction

This document contains the Bozeat Parish Council reactions to the responses submitted by the Applicant to our written representation in their document **REP2-048 GH8.1.13_Applicant Responses to Written Representations**.

As with our written representation I am representing both the Parish Council and CPRE Northamptonshire and have restricted the feedback in this document to the Applicant responses to the Bozeat Parish Council representation.

Reference	Applicant response	Feedback
BPC-002	As set out in Table 13.10 of the **ES Chapter 13 Transport and Access [EX2/GH6.2.13_A]**, Access F2 is required for construction and operation of Green Hill F as well as construction of the Cable Route Corridor. The Applicant therefore disagrees that Access F-2 is not necessary. As set out in **Applicants Responses to ExA First Written Questions [REP1-163]** in response to Q20.0.9, during the reasonable worst case peak of the construction phase, there would be a limited number of construction vehicle movements routing on London Road/Easton Lane in Bozeat. It is considered that the	This response contradicts the Applicant's response at ISH1 where it was clearly acknowledged by the Applicant that the track from Access F-3 connects to Access F-2 and that this could be used instead. It was implied that this would be more inconvenient rather than impossible. Route 81 is of High sensitivity and of great concern to residents of Bozeat. Can the Applicant demonstrate why Route 81 is essential and why

	measures set out in the **OCTMP Revision A [REP1-145]** would minimise the scope for conflicts between highway users and protect highway safety. The assessment in the **ES Chapter 13 Transport and Access [APP-050]** shows that there will be no significant adverse transport effects in Bozeat.	Access F-2 cannot be reached from Access F-3? If not, we maintain our view that Route 81 should be deleted from the scheme.
BPC-003	The LVIA acknowledges that locally prior to the establishment of the Embedded Mitigation, there would be an immediate change to the character of the individual Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. However, these effects would be limited to the site itself and its immediate setting. As planting matures it would begin to provide enclosure to the individual Sites, screening and providing containment to the Scheme allowing it to become more absorbed into the receiving landscape. However, given the scale of the proposals, there would be an appreciation of the Scheme within its immediate surroundings which would be notably different from the character of the surrounding arable countryside. With respect to impacts on local community, particularly in respect to community identity and culture, and the way communities perceive and engage with their surroundings, it is acknowledged that there will be a long-term impact during the Scheme's lifetime. Changes in community perceptions of the Scheme will be gradual and reliant on landscape and ecological mitigation maturing, and use of PRoW and permissive routes onsite becoming more widespread. As such, this is why the assessment of impacts on community identity and culture in ES Chapter 18: Human Health [APP-055] has identified a two-stage assessment outcome for the operational phase of the Scheme: a temporary medium- to long-term minor adverse effect initially, before reducing to a long term minor/negligible adverse effect in the areas most directly affected.	It is hard to take seriously the level of impact suggested by the Applicant especially within an undulating landscape where even fully mature and successful screening would not completely screen the development. The extensive distribution of the scheme across the landscape means that those living and travelling through the landscape would spend much of their time within the immediate setting of the scheme. Even with fully mature screening residents would inevitably experience views of the scheme infrastructure as they move through the landscape and be aware that they were living within a landscape dominated by solar infrastructure. We suggest that during development and until the screening is fully mature the impact would be Major adverse decreasing to Major-medium adverse. Those using PROWs that pass by or through the scheme would find it overbearing when not screened and lament the loss of open countryside views when screened. They would also lament the loss of tranquillity resulting not only from the change in the visual experience, but also from the noise created by the electrical infrastructure which would dominate or drown out birdsong. The recreational value of the affected PROWs would be

		substantially diminished meaning that they would be largely avoided.
BPC-004	The LVIA recognises that the proposed new landscape mitigation measures will take time to establish as set out within para 8.8.12 to 8.8.15 of the **ES Chapter 8 Landscape and Visual Impact [APP-045]**. A future year of 2044 (15 years post first operation of the Scheme) is considered for the **ES Chapter 8 Landscape and Visual Impact [APP-045]** and supporting appendices i.e., 15 years after commissioning, which is the typical period for the maturation of landscape planting. However, in reality mitigation would begin to take effect in advance of this point. For example, the OLEMP requires that the existing hedgerows are 'grown out' to a target height of 4m – 4.5m. Growth rates are estimated to be 0.4m a year, and depending on the existing height of the hedgerows, could take considerably less than 15 years to reach this desired height. In practice, growth rates are species-dependent and will vary according to local conditions such as soil conditions and growth competition. Under favourable conditions, faster growing native pioneer species are likely to achieve or exceed the proposed growth rates, whereas slower-growing native species may establish more gradually. The uniform rate therefore represents an average rather than a site-specific prediction. Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the OLEMP Revision A [REP1-137]. This includes measures for the formative pruning and ongoing long term management of proposed and existing hedgerows, trees and woodland within the Scheme. The detailed LEMP must be substantially in accordance with the Outline LEMP and be implemented as approved, as secured by Requirement 7 of the **Draft DCO Revision A [REP1-008]**.	The screening would have very little effect until it masks the majority of the infrastructure. Does the DCO contain provisions to guarantee that the monitoring and management of the mitigation for the lifetime of the scheme? It is important that the DCO includes ongoing funding for the affected local authorities to monitor the scheme and for an environmental team to manage it.
BPC-005	Impacts on PROWs and recreational routes are set out in **ES Chapter 17: Socio-Economics, Tourism and Recreation [APP-054]** and its appendix (**Revision A) [REP1-079]**. This assesses the impact on the useability and user experience of each PRoW likely to be affected by the	Again, it is hard to take seriously the assessment of impact suggested by the Applicant. Recreational users of PROWs and country roads are predominantly

	Scheme individually at the construction, operation, replacement, and decommissioning phases of the Scheme. This assessment includes consideration of long-and short-range views, vegetation and planting proposals, noise, glint and glare, and perception of safety. Whilst it is understood there will be some level of adverse effect to PROWs and the recreational use of highways, it is not considered that these effects are significant at any stage of the Scheme, subject to implementation of mitigation in accordance with the Requirements.	using them to enjoy the open countryside and escape the urban environment and industrialisation. During the operational phase the change in the nature of the experience would be substantial and drive most users to other routes. During construction, replacement and decommissioning there will be additional disruption and interruption of routes.
BPC-006	The **OBSSMP Revision A [REP1-143]** and **ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]** outline how a BESS failure event can be prevented and off-site impacts fully mitigated. The modelling report assesses the environmental impact of a BESS thermal runaway incident on sensitive receptors within a 1 km radius of the potential BESS areas (Green Hill BESS and Green Hill C), to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH3), nitrogen dioxide (NO2) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. The maximum modelled one-hour mean concentrations over the five modelled years for the worst case BESS fire location for each sensitive receptor are presented in Table 9 of **ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]**. To account for a longer duration fire, these have been compared against the 8 hour Acute Exposure Guideline Levels (see table below), and this is considered to be a worst-case approach as it assumes that the maximum one-hour mean concentration would be sustained for eight hours, which in reality is highly unlikely. [[table omitted]] As indicated in Table 9 of **ES Appendix 16.2: BESS Fire Emissions Modelling [APP-167]**, the predicted maximum one-hour PM10 concentrations were all well below the eight-hour WEL (4mg/m3) and all other maximum	This response is very concerning in that it does not answer the concerns about rainfall during a fire event bringing toxic chemicals to earth. It also suggests that provision for firefighting is only for a maximum of 8 hour event despite the fact that the Liverpool battery fire lasted for 72 hours. This raises the question of whether the fire assessment is adequate both in omitting consideration of possible pollution from toxic rain and whether the provisions for containment of water onsite are adequate for the duration of the fire. During ISH1 the Applicant did not answer the question of how long the on-site water retention could retain cooling water during a fire event and this should be clarified.

	one-hour concentrations were below 8-hour AEGL level 2 (irreversible or other serious, long lasting health effects or an impaired ability to escape). In addition, all concentrations were below 8-hour AEGL level 1 with the exception of HF, where there is an exceedance of AEGL level 1 along a Public Right of Way (PROW) (PROW 2) when the BESS fire is located at a point closest to this location (BESS 1). Should a fire occur in close proximity to the PROW, it is unlikely members of the public would be exposed for any significant period of time as it is expected that they would move away from a fire to ensure their safety. As such the effect of BESS fire emissions during the operational phase is predicted to be not significant. The **OBSSMP Revision A [REP1-143]** submitted at deadline 1 incorporates key testing and safety requirements included in the revised NFPA 855 (2026) standard. The OBSSMP stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. Emergency Response Plans (ERPs) can only be drafted when based upon a specific BESS design, key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics requires significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 5.4.4 of the OBSSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including:	

	"Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure." Section 2.4.2 of the OBSSMP stipulates: Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any NFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. Northamptonshire Fire & Rescue Service (NFRS) intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy will be finalised with NFRS and be clearly communicated in the Emergency Response Plan (ERP): • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite. A BESS system and site-specific Emergency Response Plan (ERP) will be developed at the detailed design stage, based on national and international best practice measures. These measures, including the ERP, are included in the **OBSSMP** and the **OCEMP Revision A [REP1-131]**, is secured in by Requirement 6 and 13 respectively, in Schedule 2 of to the **Draft DCO Revision A [REP1-008]**.	
BPC-007	Impacts on ecology and biodiversity are discussed in detail within the Environmental Statement Chapter 9 Ecology and Biodiversity Revision A [REP1-033]. This assesses impacts at all stages of the Scheme. A detailed response in regard to deer is provided in Please refer to the Applicant's response to comment 'FC-008' in **The Applicant's Response to Relevant Representations [REP1-161]**.	We note that an impact is acknowledged. A concern raised by this response is that some deer, particularly immature deer, may be able to enter sites and become unable to find their way out.
BPC-008	Section 5.2 of the **OCTMP Revision A [REP1-145]** sets out the approach to road condition surveys	It is concerning that the implication in this section is that the Applicant or their successor is

	and rectifying any highway defects attributable to the construction activities.	likely to dispute responsibility for road defects.
BPC-009	Access F-1 is an existing access on the A509 and is a wide priority junction with a right ghost turn island. As set out in Drawing 23061-KMC-XX-AF1-DR-CH-0001_C in Appendix C of the **Transport Assessment [APP-151]**, there are no proposed improvements to this access. Access F-3 is an existing priority junction access on the A509. As set out in Drawing 23061-KMC-XX-AF3-DR-CH-0001_C included in Appendix C of the Transport Assessment [APP-151], the existing access is capable of safely accommodating HGV movements but would need to be widened on the southern kerb to facilitate cable drum deliveries. Access CR24 is an existing field access, which will require to be upgraded to a construction access for the Cable Route Corridor. The proposed improvements are shown in Drawing 23061-KMC-XX-CR24-DR-CH-0001_C of Appendix C of the **ES Appendix 13.2 Transport Assessment Part 2 of 3 [APP-152]**. The upgrade of these two accesses on the A509 would require temporary traffic management, which would be submitted to the local highway authority for approval as part of any application for a road space permit as set out under Article 9 'Application of Permit Schemes' in the **Draft DCO Revision A [REP1-008]**. The traffic management would need to accord with Chapter 8 of the Department of Transport's Traffic Signs Manual. The local highway authority, who manages the network, would be able to place any reasonable conditions on the road space permit to minimise the disruption of the works. This may include traffic management not being on the network during peak hours.	Why can the operational hours of traffic management on the A509 not simply be included in the DCO rather than relying on it being noticed by the Highways among many other TTRO requests?
BPC-010	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. **Consultation Report Revision A [REP1-017]** details how two phases of community consultation were undertaken to share information and invite feedback at different stages of the Scheme development. The early engagement during the non statutory consultation phase is summarised in Chapter 4 of the Consultation Report Revision A [REP1-017].	We remain of the opinion that while the elements of consultation took place, it did not feel as though they influenced the scheme.

	A summary of comments made by Bozeat Parish Council in response to statutory consultation and targeted consultation for the Scheme is provided in Appendix 5.8 of the **Consultation Report [APP-031]** and Appendix 5.12 of the **Consultation Report [APP-035]**. The Applicant notes **Adequacy of Consultation Responses [AoC 001 – AoC- 015]** where consultees provided feedback on the adequacy of the consultation. The Applicant notes the Decision to Accept Application [PD-003] by the Planning Inspectorate as an indication that sufficient consultation was undertaken. Please also refer to reference BPC-002 which confirms the need to utilise Link 81 to access Green Hill F by Access F-2 for the purposes of construction, the cable route corridor, operation and decommissioning.	
BPC-011	The Applicant has responded to these points in the above comments BPC-002 to BPC-010. The Applicant notes that National Policy Statement EN-1 confirms in paragraphs 3.2.6 to 3.2.8 that the Secretary of State should assess all applications for renewable energy infrastructure on the basis that there is an urgent need for this infrastructure, and that the specific contribution of an individual project does not need to be established. Paragraph 2.3.9 of NPS EN-3 further acknowledges that because renewable energy resources can only be developed where the resource exists, and because there is no limit on the need established in NPS EN-1, a consecutive approach should not be used in considering applications for renewable energy projects.	In other words, the Applicant suggests that the adverse impacts should be overridden because they have put together a scheme. The need has not been challenged however; the sun is not constrained to this part of Northamptonshire.