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 5 12th February 2026

Introduction

This document contains the Bozeat Parish Council reactions to the responses submitted by the Applicant in their document **REP4-022** to our responses to issues raised in our Deadline 3 responses **REP3-090**.

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. We are frustrated that the applicant has not directly answered some of the issues that we have raised.

Reference	Our comment	Applicant response	Feedback
BPC-001	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 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.	Route or Link 81 facilitates movements to access points CR23 and F2 which are necessary to provide access to the Cable Route Corridor between fields that comprise Green Hill F and to provide access to the section of Green Hill F south of Easton Lane A substation is located in this area of Green Hill F which requires specific access to this area of Green Hill F and will therefore be needed during the operation and maintenance phase in addition to the construction phase.	This response only explains why the applicant **wants** to use this route and not why they cannot use the less convenient route via Access F3 and the internal track. From the response given we would understand if there was an exceptional delivery that might require this route, but there is no reason given for this to be a route for wider use. Since the applicant is determined not to justify why this route is essential, please can the ExA seek a justification on our behalf? If there is no clear answer, we request that this route is removed from the scheme.
BPC-002	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.	The LVIA [APP-045] acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure and that this would result in a significant adverse effect to landscape character within 1km of the Sites during construction and operation Year 1. This relates to the change in landscape character from the addition of solar infrastructure. Adverse effects remain through to the decommissioning phase, although reduced and no longer Significant as a result of the establishment of the mitigation planting. The LVIA acknowledges the Scheme would result in Significant Adverse visual effects, predominantly to	We are pleased that the applicant acknowledges that there would be Significant Adverse landscape impacts and that the mitigation would not fully screen the scheme. We consider that the applicant's assessment of the landscape impact overstates the effectiveness of screening. Nevertheless, it acknowledges that receptors travelling through the landscape would experience views of the scheme which would create an impression that they were travelling through a landscape dominated by solar infrastructure. We consider that the

	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.	users of those PRoW either within or immediately alongside the Sites. However, landscape mitigation has been embedded into the design of the Scheme to help mitigate these effects. The landscape mitigation does not attempt to provide zero visibility of the proposals., in attempting a Zero Visibility approach, this would likely have a greater impact as it would be out of keeping with the existing landscape, and would affect the legacy landscape after the Scheme is removed. Mitigation measures proposed have been identified to minimise adverse visual effects complying with NPS EN-3 by "minimising the landscape and visual impact" of the Development. NPS EN-1 recognises at para 5.10.13 that "All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."	cumulative impact of this would result in a Significant Adverse change to the character of the landscape.
BPC-003	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	The OLEMP [REP3-062] sets out a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme. A detailed Landscape and Ecological Management Plan would be produced following consent of the Scheme and would be secured through Requirement 7 of the DCO.	This response does not answer the question about how the OLEMP would be monitored and financed. It is essential that, if made, the DCO contains a requirement that the operator funds both the monitoring and management of the OLEMP.

	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-004	Again, it is hard to take seriously the assessment of impact suggested by the Applicant. Recreational users of PROWs and country roads are predominantly 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.	The Applicant refers back to the comments made at Applicant's Response to Written Representations [REP2-048] at 'BPC-005'	This does not change our view that there would be a Significant Adverse impact on recreational users of the PROWs and country roads.
BPC-005	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	The Plume Study models all emissions and impacts from a BESS fire that are specified through NFCC guidance and from the Applicant's previous DCO consultations with the UK Health and Security Agency (UKHSA). The modelling considers a worst-case scenario which is a short-term emission release in worst case weather conditions recorded over a five-year period. The Liverpool BESS fire referenced was a 59-hour event which was a very prolonged event because water was discharged directly on battery systems. If boundary cooling tactics (cooling of adjacent equipment) had been adopted for the fire,	This response is not reassuring because it relies upon the "rapid dispersion of toxic gasses in outdoor BESS fires" which would not occur in all weather conditions such as during a temperature inversion. The reassurance based on off-site risks at other fires cannot be relied upon because those sites may be further from residences than the Green Hill site.

	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.	then the BESS would have burnt out in a much shorter time frame. The Liverpool BESS fire is not a relevant example to use for a plume study, because firefighting guidance and training strongly discourage discharging firefighting water supplies internally within BESS enclosures. By definition, if a single BESS unit burns for a longer time frame (more than 12 hours), then fire temperatures and emissions are lower than recorded in a shorter time frame fire event where emissions are significantly more concentrated. The Applicant's Plume study has already demonstrated that there will be no significant off-site BESS fire impacts on sensitive receptors. The rapid dispersion of toxic gases in outdoor BESS fires limits the potential for off- site toxic exposure. Air sampling from previous BESS fire incidents has found that off-site contaminant concentrations did not pose a public health risk. Recent Large Scale Fire Test (LSFT) BESS research and real-world incident experience indicates that emissions in the smoke from a BESS fire in an outdoor setting are comparable to those of a residential / commercial structure fire. Because a BESS fire would involve a modular non-combustible enclosure tested to prevent propagation, any emissions or other substances generated by a fire will be less than those produced by a fire involving most commercial or industrial building structures. In relation to the point raised at ISH1, the on- site water retention for a BESS fire is not defined by a fixed time period. Retention is capacity based rather than time based, as set out in the Outline Battery Storage Safety Management Plan (Revision A, Clean) [REP1-143].	The Emergency Response Plan must specify how the availability of tankers that would be required for the removal of polluted water can be guaranteed before the storage capacity is exceeded.

		The duration for which cooling water and rainfall captured during the period of the incident can be retained depends on the available containment volume and the rate of inflow during the incident. Where an incident is prolonged, or where rainfall occurs during the event, containment capacity is maintained through active incident management. This includes early sampling and testing of retained water, followed by controlled discharge where water quality is acceptable and, where contamination is identified, removal by tanker for off site treatment in accordance with the Emergency Response Plan.	
BPC-006	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.	As outlined in FC-008 in The Applicant's Response to Relevant Representations [REP1-161], the perimeter fencing is considered to be permeable for the species of deer identified as present or potentially present in the local landscape, and habitats within and outside of the security fencing will be highly suitable for deer post-construction. Table 1 of the Outline Ecological Protection and Mitigation Strategy (Revision A) [REP1-139] also contains the details of a local wildlife rescue centre, which can be contacted by construction/maintenance staff or the Ecological Clerk of Works should a situation arise where the welfare of an animal is at risk.	If deer are able to penetrate the fencing, then it is important that the OLEMP includes provision for replacing planting that is damaged by deer.
BPC-008	It is concerning that the implication in this section is that the Applicant or their successor is likely to dispute responsibility for road defects.	The Outline Construction Traffic Management Plan Revision B [REP3-064] provides a clear commitment to agree road condition surveys with the highway authorities and to ensure that any damage caused by the Scheme to the highway is repaired	The commitment is not clear as it enables the developer to dispute repairs. The routes used will be used by other traffic and there is potential for the developer to argue that other traffic is partly responsible for the damage. The Earls Barton bends are a case where the cost of repairs have fallen on

			council tax payers even though the heavy traffic from the quarry are the primary cause of the damage.
BPC-009	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?	The need to ensure the operational hours are suitable for specific areas of the Scheme and are suitable at the time of construction means that the Construction Traffic Management Plan is the appropriate mechanism for agreeing operational hours with the highway authorities. The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-015] where local authority consultees provided their feedback on the adequacy of the consultation. The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out. The Applicant refers to Chapter 5: Alternatives and Design Evolution [APP-042], Table 5.9 where the Applicant has set out design changes in response to comments received during the statutory consultation.	This is a disappointing response. This is a clear case where traffic management needs to be constrained and the Highways may miss it.
BPC-009	We remain of the opinion that while the elements of consultation took place, it did not feel as though they influenced the scheme.	The Applicant acknowledges this comment but remains confident in the level of consultation undertaken and the information presented. The Applicant notes Adequacy of Consultation Responses [AoC-001 to AoC-015] where local authority consultees provided their feedback on the adequacy of the consultation.	The proportion of applicant responses that do not offer any change demonstrates our case.

		The Applicant notes that these responses are taken into consideration by the Planning Inspectorate when deciding to accept an application for development consent. The Applicant is confident that appropriate and proportionate consultation with the community has been carried out. The Applicant refers to Chapter 5: Alternatives and Design Evolution [APP-042], Table 5.9 where the Applicant has set out design changes in response to comments received during the statutory consultation.	
BPC-010	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.	The Planning Statement [REP2-043] sets out the planning balance in Section 7.2. The need for such development is such that the UK Government has concluded that there is a critical national priority for the provision of nationally significant low carbon infrastructure (para. 4.2.4 of EN-1). Para. 4.2.5 confirms that solar development falls within the category of critical national priority by stating that low carbon infrastructure for the purposes of that policy means all onshore and offshore electricity generation that does not involve fossil fuel combustion. The environmental statement provides a robust assessment of the potential impacts of the Scheme and finds that there are limited significant adverse residual effects remaining after mitigation of which have been considered within the planning balance, concluding that the Planning Statement set out how the Scheme complies with Planning Act 2008, NPS EN-1, NPS EN-3 and NPS EN-5, including the draft	It has been clear from the start that the Grendon substation is the reason for this proposal. However, there are other substations where similar schemes are, or could be, proposed and so the presence of a connection does not in itself override all other considerations. The applicant selectively quotes from Government guidance where it supports their case but conveniently omits the areas of Government guidance that are not met by the scheme.

		versions, the NPPF and development plans. The Planning Statement [REP2-043] recognises that whilst it has not been possible to avoid all impacts, these have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies secured through this DCO Application. The national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. In addition, critical national priority policy requires that residual impacts are outweighed by the urgent need. Therefore, it is considered that development consent for the Scheme should be granted. The location of the Scheme is governed by the location of the point of the connection. The first stage of the site selection process is securing a grid connection, as this is critical to determine the Scheme's feasibility. Without a defined and agreed grid connection, the Scheme would be unfeasible.	