Thank you

I think there is a slight irony here - a scheme that is designed to bring in vast quantities of power to an area, simultaneously taking away the decision making power from locals in being an NSIP.

Given that backdrop, it becomes very important that the terms that the Secretary of State operate in are understood.

Under s104 of the Planning Act 2008, the Secretary of State must decide the application in accordance with the National Policy Statement that has effect – here namely EN-1 and EN-3.

These set out the policy tests for siting, design, mitigation, cumulative effects, land use and the acceptability of impacts in particular places.

Critically, under s104 paragraph 7 of the Planning Act, the Secretary of State may decide that the adverse impact of the proposed development would outweigh its benefits.

So the question for this examination is not whether solar is needed. National policy makes that clear.

The question is whether *this* particular scheme, meets the expectations in the National Policy Statements and whether the adverse impact of the proposed development would outweigh its benefits.

I am going to speak to what this means on the ground for the communities in South Northamptonshire that I represent.

I will address six issues and I will show how each of these either contradict the National Policy Statements or contribute to the overall picture that the adverse impacts are severe and outweigh the benefits of this proposal.

1. The scheme's fragmentation and the "spread" of harm

This scheme is not just large. It is unusually fragmented.

As you are well aware, it comprises nine separate sites linked by around 31km of cabling - a proposal the size of Heathrow Airport but spread over 16 miles.

That is not a neutral design feature.

EN-1 section 4.3.15 is explicit that applicants must include information about reasonable alternatives they have studied including the main reasons for the choice, taking account of environmental, social and economic effects.

So I want to put a simple question on the record:

Is the evidence supplied to date by the applicant sufficient to

1. *justify that this level of fragmentation is unavoidable, rather than simply convenient for land assembly and*
2. *Ensure that it does not drive a materially wider and more severe spread of harm than a more condensed layout would have done?*

This application's structure makes it easy for harm to be assessed piecemeal. BUT the National Policy Statements (EN-1 s4.3.19) tells you <u>not to do</u> that and to take this into in the round.

Furthermore, EN-1 4.7.2 requires a proposal to be "efficient in the use of natural resources, including land-use". How is it reasonable for a scheme that is so inefficiently spread over such a large area to claim to be efficient in its use of land?

2. <u>Landscape, visual amenity and the encirclement of Easton Maudit</u>

Under this proposal, over 750 acres around Easton Maudit, Bozeat and Grendon would be taken up by solar panels and battery storage infrastructure under Sites F and the BESS.

Easton Maudit would be surrounded by panels on three sides, leaving only one remaining open approach.

This goes far beyond the standard expectation of "views of infrastructure" - it is a case of <u>spatial enclosure</u> of a historic village.

EN-1 requires an applicant to submit a Landscape and Visual Impact Assessment which the applicant has done – but I question its analysis.

For example, outlining the impact of Site F,

- It proudly states that there are no Listed Buildings on the site – of course not, it is an agricultural field, but there are 4 Grade 1 listed and 91 Grade 2 listed buildings nearby.

- Even with the SSSI, “there are no SSSIs on the site” but there is one “located approximately 70m east of the eastern Site boundary”. If I were Usain Bolt, with his 100m record I could easily reach that SSSI in less than 9.58 seconds.

To return to my initial point - with this design as it stands, can you realistically avoid the outcome that Easton Maudit becomes functionally and visually enclosed by energy infrastructure for decades. The answer is – NO.

Now heritage.

Easton Maudit as noted contains a Grade I listed church and multiple Grade II listed buildings, with the development altering the setting for the full operational period.

EN-1 Sections 5.9.28 and 29 require the Secretary of State to give great weight to a heritage asset’s conservation and any harm to its significance should require clear and convincing justification.

Has this test been met if Easton Maudit and its listed buildings are surrounded for a minimum of 60 years? It does not appear so.

3. Best and Most Versatile Land

EN-1 sections 5.11.12 & .34 not only state that applicants should seek to minimise impacts on BMV land and preferably use poorer quality land but also that the Secretary of State should ensure applicants do not site their scheme on BMV land without justification.

EN-3 section 2.10.21 goes further and for solar schemes says where possible it should utilise suitable previously developed, brownfield, contaminated or industrial land; where agricultural land is necessary, poorer quality should be preferred, avoiding BMV where possible.

This project covers approximately 1,200 hectares of predominantly agricultural land. The total BMV land affected is 854.5 hectares, around 65% of the scheme and some individual sites have exceptionally high proportions of BMV, including Site D at 90.2% BMV.

EN-3 stresses that the applicant must demonstrate the policy expectation of minimisation and preference for poorer land and whether the justification meets the standard implied by EN-1.

A scheme that is 65% BMV is not starting from a position of minimisation. It is starting from a position that contradicts these National Policy Statements.

4. Duration, repowering and the absence of hard decommissioning security

EN-3 section 2.10.140-142 states an upper limit of 40 years is typical and that the time-limited nature is likely to be an important consideration for the Secretary of State including a DCO requirement to secure decommissioning after the permitted operation.

The critical question therefore is:

If 40 years is typical and time-limited consent is an important consideration, what is the justified basis for 60 years here and what precisely is secured, not promised, to ensure that after that period the land is restored and the infrastructure is removed?

On this point, ownership change is possible (indeed Island Green Power's own ownership has changed hands to Macquarie Group) and there seems to be no guaranteed mechanism to secure decommissioning funding regardless of ownership.

EN-3 2.10.138 requires the Secretary of State to ensure outline decommissioning plans are put forward and that land is restored to a suitable use. Are we satisfied that there is an enforceable mechanism that makes decommissioning credible over 60 years?

5. BESS near Grendon

A 500MW BESS is proposed by this scheme.

With other BESS installations, either operational or consented, locally this amounts to nearly 600MW concentrated near Grendon.

The question today is whether this scale and concentration is acceptable in this location.

The risks posed by BESS will have been previously detailed but I note that the Government itself seems to be recognising these.

In a letter to me on 24th November 2025 Minister Michael Shanks outlined that the Government is considering integrating BESS into the existing Environmental Permitting Regulations framework in order to deal with safety concerns.

If the existing framework of BESS regulations are insufficient, I find it hard to see how this existing proposal can be safe for residents.

There is also a well documented flood risk history and obvious proximity to sensitive receptors and waterways.

We know this part of this site is located next to a SSSI – an area protected by law to avoid harm and yet this development may be permitted which cuts straight across that.

EN-1 also require that residual flood risk be managed, including the presence of flood warning and evacuation planning.

Are we satisfied these have been addressed correctly?

Furthermore, the Green Hill BESS will be located on a 43.27 hectares site – to put that into context that it the size of around 60 football pitches, and which – as the applicant admits - is on agricultural land, over 50% of which is BMV. This is wrong.

6. Cumulative impacts

EN-1 requires decision makers to consider the cumulative effects of a scheme on the environment, economy or community as a whole (even if acceptable individually).

For my constituents, the cumulative effect is not a theoretical planning concept. It is the lived reality of a development for all the reasons cited before

Closing

I will close with the core questions your recommendation must confront

1. Alternatives and design. Has the applicant complied sufficiently with EN-1's requirement to provide information about reasonable alternatives and justify the chosen configuration and can you be satisfied the unusually fragmented layout does not unnecessarily multiply harm across communities?

2. Easton Maudit and heritage. Has harm to the setting of heritage assets and the settlement's character genuinely been minimised through siting and design and if not, what is the "clear and convincing justification" EN-1 requires for harm within the setting of designated assets?

3. BMV land. How does a scheme that is 65% BMV meet the EN-1 and EN-3 expectation to minimise BMV impacts and prefer poorer quality land and is the justification EN-1 anticipates when BMV is used satisfactory?

4. Lifetime and decommissioning. Given EN-3 requirements is 60 years justifiable; and what enforceable mechanism makes decommissioning credible over that period?

5. BESS. Can you be satisfied of the safety of this scheme and mitigation measures required by EN-1?

This proposal unreasonably contradicts the National Policy Statements that govern it and at the very least it is clear that the s104 test of adverse impact outweighing benefits is triggered.

Thank you.