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Our Ref: NW/24/00425/EXT  
Your Ref: EN010170-000015  
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FAO Alison L Down

Via email: [greenhill@planninginspectorate.gov.uk](mailto:greenhill@planninginspectorate.gov.uk)

Dear Alison

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by Green Hill Solar Farm Limited (the Applicant) for an Order granting Development Consent for the Green Hill Solar Farm (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.**

I write further to your letter dated and received on 25 July 2024 regarding the above development.

North Northamptonshire Council understands that its views are sought, as a statutory consultee on the scoping opinion which has been submitted to the Secretary of State under the terms of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. North Northamptonshire Council also understands that the Secretary of State will consult all the relevant statutory bodies in respect of this scoping opinion.

The project is cross border with the main element of the proposed solar farm being within North Northamptonshire Council district (Sites C, D, E, F and BESS) and further sites in the adjoining West Northamptonshire Council (Sites A, A.2 and B) and Milton Keynes Council (Site G). The cabling route is proposed to connect the Sites to the existing Grendon Substation, within North Northamptonshire and referred to as BESS Site within the Environmental Impact Assessment (EIA) Scoping Report. It is noted that the Scoping Report refers to the fact that the exact location of the proposed cabling to connect the Sites to the existing Grendon Substation is not yet known, it will be refined as the design of the Scheme is developed and additional technical surveys are carried out. Temporary construction compounds will also be required.

The submitted Scoping Report contains the following chapters and comments are provided on each of them accordingly.

### **The Scheme**

The sites (as referred to above as Sites A, A.2, B, C, D, E, F, G and BESS) for built development are identified as solar panels, substations and energy storage and are located within a 20-kilometre radius of the grid connection at Grendon Substation. Appendix 3 in the Scoping Report shows the exact locations of these sites. It is noted that the Scoping Report also gives a detailed description of the physical characteristics and constraints of the surrounding areas.

It is understood that the exact type of solar panels is not yet decided and that the options have been separated into Option A (Tracking Panels) and Option B (Fixed Panels). Further detailed assessment of the potential implications of the design should be considered in the Environmental Statement when an option has been decided for each Site. The same should take place for the cabling route once confirmed.

It is noted that the operational life of the Scheme is anticipated to be up to 60 years, followed then by decommissioning.

### **Alternatives Considered**

It is welcomed that the Environmental Statement will contain a chapter that will consider alternative sites. There is reference within the Scoping Report regarding alternatives however detail is limited on alternatives at this stage. Given that there are several Sites within the Scheme, consideration should be given in the first instance as to whether all of these Sites are required, or some could be removed.

### **Consultation**

I can confirm that the applicant has already undertaken early consultation work with North Northamptonshire Council alongside statutory consultees, and it is encouraging that the applicant is undertaking the same with West Northamptonshire Council and Milton Keynes Council. It is welcomed that further consultation will be undertaken with statutory and non-statutory consultees as the process progresses.

Consultation with host and neighbouring Parish and Town Councils, Neighbourhood Planning Groups and elected Members within all three authorities will be very important in the consultation process. Once the solar design detail, cabling route and layout detail is known, engagement and consultation with these parties will be critical.

### **Comments on the General Approach**

Each topic within the Environmental Statement should assess mitigation in detail and should include a schedule of deliverable environmental commitments along with monitoring and control mechanisms. The mitigation order should be avoid, minimise or reduce impact and remedy or compensate.

The Environmental Statement should contain an appendix which sets out the evidence base documents that are to be used to inform the baseline. This evidence should be up

to date and in accordance with the Regulations. North Northamptonshire Council are happy to assist in providing evidence where required.

## **Proposed Topics**

### **Cumulative Impact**

In respect of cumulative impact, the Council offer the following comments.

In addition to in combination cumulative effects from other proposed or permitted schemes in the vicinity of the development, the Environmental Statement should consider the cumulative effect of other large scale solar schemes that are currently in operation in the North Northamptonshire Council district.

Whilst it is accepted these schemes are not located within the immediate area of this site, they are similar large-scale projects that will occupy swathes of agricultural land present within the North Northamptonshire Council district. Examples are Land off Gipsy Lane, Irchester and Land off the Ridge, Great Doddington.

### **Climate Change**

In respect of climate change the North Northamptonshire Council offer the following comments.

The methodology for climate related assessments is sound. It is noted that it is proposed to scope out of the Environmental Statement 'sea level' rise as the scheme is not located in an area that is susceptible to sea level rise. This is considered sensible and agreed.

### **Landscape and Visual Amenity**

In respect of landscape and visual amenity the North Northamptonshire Council offer the following comments.

Both tracking panels (maximum height above ground level – 4.5 metres) and fixed panels (maximum height above ground level- 3.5 metres) are being explored. It's expected that these will be provided in conjunction with conversion units (maximum height of 3.5 metres), compound fencing (palisade fencing), perimeter deer type wire and mess fencing (maximum height 2.5 metres) and CCTV camera poles (maximum height 3 metres).

The Landscape and Visual Impact chapter of the Environmental Statement will consider the likely significant effects of the Scheme on Landscape and Visual receptors during the associated construction, operation, and decommissioning phases. It's expected that the chapter will provide detail of the existing baseline scenario and the nature of change. It will identify the effects upon receptors arising because of the proposed Scheme and the significance associated with identified effects based on the sensitivity of these receptors to change and the magnitude of any change that will likely occur.

Local planning policy is set out at paragraph 7.3.6 of the Scoping Report. For North Northamptonshire, policy 3 'Landscape Character' and policy 26 'Renewable and Low Carbon Energy' of the North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) should also be considered and included in future assessments.

Given the scale and nature of the project we are satisfied with the proposed Study Areas for the Local Study Area (1 kilometre), the Wider Study Area (2 kilometre) and the Outer Study Area (5 kilometres) for the Sites, as well as the Study Area of 0.5 kilometres for the proposed from the outer boundary of the Cable Corridor. It is understood that the cable corridor is being refined and ask that North Northamptonshire Council are consulted when this information becomes available.

### Landscape Character

The Study Area does not contain any National or Local Landscape specific designations such as National Parks or National Landscapes.

As the report states, at the National level, the Green Hill C, D, E and Green Hill BESS are located within National Character Area (NCA) 89 Northamptonshire Vales. Whilst Green Hill F is located within 91 Yardley-Whittlewood Ridge.

At the regional level, Green Hill C and D are located within Northamptonshire Landscape Character Area (LCA) 5b Sywell Plateau. The majority of Green Hill F is also located within Northamptonshire 5b Sywell Plateau, except for parts of the southern, eastern and western edges which are partly located within the Northamptonshire LCA 4c Ecton and Earls Barton Slopes.

Green Hill BESS is located primarily within LCA 18d The Nene - Billing Wharf to Woodford Mill. A small portion of the southern extent of Green Hill BESS is located within the Northamptonshire LCA 18d The Nene - Billing Wharf to Woodford Mill along with the northern portion of Green Hill F.

The remaining extent of Green Hill F is located within Northamptonshire LCA 8b Salcey Forest and Yardley Chase, with only a very small portion of Green Hill F within Northamptonshire LCA 6c Bozeat Claylands.

At the local level, there are no landscape character receptors. However, a detailed description of the landscape each Site area has been provided. This includes a description of topography, land use and vegetation. Moving forward It's expected that a detailed analysis of landscape value (informed by the Technical Guidance Note 02/21, Assessing landscape value outside national designations) for each Site is undertaken and used to inform judgements.

### Visual Baseline

NNC independently appointed landscape consultant has reviewed the selected viewpoints and note that previously recommended viewpoint locations are included and therefore are satisfied that this list is representative of the relevant receptor groups and include key views from public rights of way, roads, settlements and vantage points in the local area. Moving forward NNC independently appointed landscape consultant would expect all viewpoint photography to be presented as Type 1 visuals in accordance with the Landscape Institute Technical Guidance Note 06/19, Visual Representation of Development Proposals. It would also be advised that a number of the photographs are presented as Type 4 photomontages to help guide NNC independently appointed

landscape consultant review of the scheme and its impact on visual receptors. These viewpoints should include:

- VP12
- VP13
- VP15
- VP17
- VP20
- VP19
- VP22
- VP26
- VP27
- VP42
- VPNN9
- VPNN10
- VP28
- VP29

Furthermore, NNC independently appointed landscape consultant advise that as part of the Environmental Statement a number of photomontages at 60+ years are produced to show how mitigation measures will benefit the landscape. Ideally, these would show the view after the development has been decommissioned as this will demonstrate the remaining long-term legacy of the scheme. Currently minimal information regarding the outline mitigation proposals have been provided therefore NNC independently appointed landscape consultant has not provided any viewpoint recommendations, however as the strategy is developed, NNC independently appointed landscape consultant asks that North Northamptonshire Council are consulted to discuss these matters.

### Methodology

The report confirms that the Landscape Visual Impact Assessment (LVIA) will be undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) 2013. It also states that due to the Sites large scale, it will be considered as one entity in its entirety, before being broken down into individual area and the cable route Search area, which is welcomed.

Assessment Criteria - NNC independently appointed landscape consultant generally agrees with the LVIA approach and methodology, however seeks further clarity regarding the landscape value criteria definitions in Table 7.2.1.3: Landscape Receptor Value. Currently the 'condition' for a medium value landscape is defined as a 'ordinary to good quality landscape'. Whereas a high value landscape is defined as a 'very high-quality landscape/feature; attractive landscape/feature; exceptional.'. This seems to be a considerable jump in condition, especially considering the difference between terms 'ordinary' and 'very-high quality'. NNC independently appointed landscape consultant therefore recommends that definitions are amended to reduce the disparity between the definition of high and medium value. Terms could include 'strong strength of character', 'high quality', 'good quality' and 'major contribution'.

Given the dispersed nature of the individual areas, we also want to emphasise the need to consider sequential views when assessing visual effects along transport and public rights of way receptors.

### Scoped Receptors

For the most part NNC independently appointed landscape consultant agrees with the landscape and visual receptors that have been scoped in and out of the assessment.

NNC independently appointed landscape consultant does however have the following recommendations:

Night-time - There is no reference in the Scoping Report or associated Landscape and Visual Scoping Sheets (Appendix 7.4 and 7.5) that an assessment of effects from lighting is scoped into the Environmental Statement. Noting the rural, largely unlit environment in which the Proposed Development is located, NNC independently appointed landscape consultant are of the professional opinion that night-time effects should be scoped into the assessment. In turn, visual effects resulting from the introduction of lighting during construction, operation and decommissioning which are likely to result in significant effects should be assessed in the Environmental Statement.

Landscape character - The applicant states that National and Regional landscape character areas will for the most part be scoped in, which is acceptable. However, given many of the areas fall across multiple LCAs and the dispersed nature of the solar array areas, we question whether there is a need to also assess local landscape character. This could be by assessing individual landscape features (such as tree cover, field boundaries, landform and watercourses), the landscape character of each individual area (Green Hill A, A.2, B, C, D, E, F G and BESS) or identified Local Landscape Character Areas (LLCAs) that takes account of settlements, their setting and the areas of land within the Site boundary.

#### Mitigation Measures

At this early stage NNC independently appointed landscape consultant would not expect to see mitigation measures presented. However, North Northamptonshire Council would ask that the applicant's consultant seeks NNC independently appointed landscape consultant comments and recommendations on any concepts at the earliest opportunity to ensure all possible options for embedded and additional mitigation are taken.

#### Cumulative Effects

The methodology for assessing cumulative landscape and visual effects is deemed to be acceptable and accords with GLVIA3 definitions. The applicant should consider the use of additional relevant viewpoints where combined views may possible.

#### Other matters

Trees and Hedgerows - Many of the field boundaries within the study area are formed by mature hedgerows, which are an important feature of the existing character of the landscape. We ask that existing vegetation is mapped and any loss of or impacts to hedgerows, trees or woodland which are likely to result in significant effects on landscape and visual amenity are assessed in the Environmental Statement.

Similarly, there is reference to the Hedgerows Regulations 1997 in Chapter 8 (Ecology and Biodiversity, however it's unclear whether a hedgerow assessment is being undertaken to understand if any hedgerows are classed as 'important' under the Regulations (30 years old and ecology and/or heritage criteria).

The above highlights a number of critical areas of consideration in relation to landscape and visual impacts. The proposed development, which spans multiple areas presents a

complex challenge in balancing the need for renewable energy with the preservation of the local landscape's character and visual integrity.

The assessment of landscape character and visual receptors, as outlined, is generally sound, with a thoughtful approach to identifying and analysing potential impacts. However, the methodology needs some refinement, particularly in defining landscape value criteria, considering night-time visual effects, and ensuring a thorough assessment of local landscape features.

### **Ecology and Biodiversity**

In respect of ecology and biodiversity North Northamptonshire Council offer the following comments.

#### Wildfire risk

North Northamptonshire Council ecology officer is of the opinion that putting solar panels of this scale could increase the likelihood of wildfire and without a well thought out and thorough mitigation strategy, there is potentially negative impacts of the development. Some of them have been raised in the Scoping Report others have not. One that has not been considered is the potential impact on biodiversity and particularly the ability of the development's ability to deliver its Biodiversity Net Gain (BNG) obligations in the scenario where a wildfire destroys the habitats created as part of BNG but also in the wider landscape. It may be prudent (even required) that insurance be taken out to cover this scenario.

The landscape and Biodiversity Net Gain delivery plans will need to show where the firebreaks are to be located citing the distances for clearance from any national guidance (such as Building wildfire resilience into forest management planning) with the ultimate goal of limiting the spread of any wildfire which is also obviously important when considering the proximity of the proposed solar farm to residential areas (North Northamptonshire Council ecology officer has not considered further here the potential impacts of wildfire on residential areas, though it is strongly advised the appropriate consultees should consider this).

#### Biodiversity Net Gain

The approach outlined in the Scoping Report is generally acceptable (aside from the point made above regarding wildfire risk needing to be addressed). The rules around stacking and additionality of mitigation delivery will need to be followed and detailed in the Biodiversity Gains Plan. For clarity, before the Local Planning Authority (LPA) approves a biodiversity gain plan, it must check:

- any off-site gains in the plan have been registered.
  - those off-site gains have been recorded as allocated to the development in question.
  - the biodiversity value of the gains in the gain plan matches the value recorded on the register.

[Biodiversity net gain: what local planning authorities should do - GOV.UK](https://www.gov.uk/government/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do)  
([www.gov.uk](https://www.gov.uk))

In addition to the Biodiversity Gains Plan the submission of a completed Statutory Biodiversity Net Gain metric and pre and post condition assessment sheets must be submitted.

North Northamptonshire Council ecology officer would add that low stocking density sheep grazing is likely to be the best way managing many of the habitats amongst the solar panels. The inclusion of south facing bee banks (following the Buglife guidance) should be included in the Biodiversity Net Gain grassland habitats (as part of the bare ground element) to aid invertebrates and by default species above and below in the trophic web.

### Urban Heat

The proposals have the potential to increase/exacerbate urban heating in the surrounding areas without mitigation. Regarding biodiversity, North Northamptonshire Council ecology officer does not agree with paragraphs 6.4.16 – 6.4.18 (inclusive) and Table 6.3 in the Scoping Report. North Northamptonshire Council ecology officer considers paragraph 6.4.18 is false in its assumptions when it comes to urban heating (and could be wrong in other aspects depending on abiotic factors). The applicants will need to show how receptors (human and biodiversity) are not to be affected for there to be no need for mitigation given the extension to the built realm that this development represents in close proximity to residential areas. In our view, urban heating mitigation can be used under additionality rules for Biodiversity Net Gain delivery. This subject in light of biodiversity, will need to be covered in both Sections of climate change and in Cumulative Effects, with the latter likely to be the more influential in any impacts.

### The Loss of Agricultural Land

The loss of agricultural land is often most acutely felt by the following species, and North Northamptonshire Council ecology officer considers that it will be difficult to fully mitigate for the impacts on these species onsite:

- Brown hare – Fields of sufficient size with good lines of sight (unhindered by solar panels) for here's will be needed for mitigation to be successful whether that is on or off site.
- Ground nesting birds – Fields of sufficient size with good lines of sight (unhindered by solar panels) for Ground nesting birds will be needed for mitigation to be successful whether that is on or off site. The North Northamptonshire Council is working with NatureSpace to form a District wide mitigation strategy to cover impacts on Ground nesting birds with solar farms being one of the main focuses for needing mitigation.
- Special Protection Area (SPA) qualifying species & functionally link land Impacts – We find no fault with the statements (so long as Natural England are content with the surveys approach) made in point 8.3.56 of the Scoping Report, but like impacts on Brown hare and Ground nesting birds, mitigation onsite will likely be difficult unless an area is given over as mitigation onsite or delivered offsite.
- Barn owl – Barn owl might be able to utilise the spaces between rows of panels depending on the spacing between the rows, the applicants team will need to demonstrate this with examples where monitoring has shown barn owls a minimum level of gap between the rows. If not possible then mitigation will need



to be delivered offsite or in areas of the site with no built infrastructure, of sufficient size, lacking frequent anthropogenic disturbance and be appropriate grassland habitat.

#### Other Potential Receptors

The following receptors should not be an issue so long as fairly standard mitigation (construction and post construction phases) measures be put in place;  
Badgers, Great Crested Newts (GCN), Reptiles, hedgerows, watercourses and Bats.

#### Ecological Impact Assessment (EclA)

North Northamptonshire Council ecology officer expects the application to be accompanied by an Ecological Impact Assessment, following CIEEM survey guidelines including all phase 2 surveys recommended in the Ecological Impact Assessment. At paragraph 8.5.1 of the Scoping Report it appears that (though not explicitly stated) an Ecological Impact Assessment is scoped in.

#### Drainage, water quality & pond creation.

Peak follow management is important because the higher the peak flow above the average/median flow rates the more harm is done to the river system/catchment with higher erosion rates (and subsequent deposition elsewhere downstream) and the more loading put on water treatment assets which can lead to adverse water quality issues when capacity is strained.

The use of water storage tanks does not deal with water quality issues (tanks do not offer any filtration/treatment) related to water discharge from the site, tanks also present a legacy issue for management regarding their deconstruction/decommissioning at the end of their lifetimes with their use not representing best practice. The use of Sustainable Urban Drainage is preferred.

Sustainable Urban Drainage Systems should be designed in such a way that they hold water through some of the year by raising any out flow pipes off the bottom of the basins. Doing this will enable the flora to have more stability in water availability and thus the Sustainable Urban Drainage Systems should then have some stability in the habitats in and around the ponds as well as reducing the peak flows entering the water courses.

#### General

Local Planning policy is set out at paragraph 8.2.5 of the Scoping Report. For North Northamptonshire, policy 26 'Renewable and Low Carbon Energy' of the North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) should also be considered and included.

At paragraph 8.3.14 it is noted that the Cable Corridor will be assessed in the Environmental Statement and that disturbance will be limited in extent given the narrow width of the cable trench required. This is not agreed at this point in time as the effects on ecology and biodiversity cannot be established until the routes have been defined. North Northamptonshire Council would expect to see full ecological surveys undertaken for these finalised routes.

### **Hydrology, Flood Risk and Drainage**

In respect of hydrology, flood risk and drainage the Council offer the following comments.

It is noted that a Flood Risk Assessment will be provided to support the Development Consent Order (DCO) application and consultation with the Environment Agency and Local Lead Flood Authority (North Northamptonshire Council) will take place, which is encouraged. Regarding flood risk, Sites within North Northamptonshire (C, D, E, F and BESS) are largely within Flood Zone 1 with a proportion in Flood Zone 3 (part of Site E and part of Site F). Site BESS is largely within Flood Zone 3.

Full surface water drainage detail will be required for all Sites.

NNC Local Lead Flood Authority (LLFA) advised that the Scoping Report provides sufficient information to be able to comment on the acceptability of the proposed surface water drainage scheme for the proposed development. It is welcomed by North Northamptonshire Council that nothing is proposed to be scoped out of this chapter. In general, the LLFA advise that reports should include calculations of current runoff from site, evidence that “the existing drainage regime of the sites will not be altered”, and in the event, it is altered, how this will be addressed. Detailed drainage plans and suitable mitigation methods, a Sustainable Drainage System (SuDS) Management Plan or Schedule will also need to be submitted.

### **Ground Conditions and Contamination**

In respect of ground conditions and contamination North Northamptonshire Council offer the following comments.

It is acknowledged that a Risk Assessment has been undertaken as part of the Preliminary Risk Assessments and that limited potential sources of contamination have been identified across the Scheme. It is further acknowledged that a Construction Environment Management Plan will be provided with the DCO submission. It is agreed that contamination be scoped out of the Environmental Statement in line with Table 10.4 of the Scoping Report and that the contamination risk can be managed via the mitigation measures proposed.

### **Minerals**

In respect of minerals North Northamptonshire Council offer the following comments.

The safeguarding of minerals is given local and national importance in Section 17 of the NPPF (Facilitating the sustainable use of minerals) and The Northamptonshire Minerals and Waste Local Plan (Adopted July 2017). It is noted that the Scheme will affect areas of safeguarded mineral resource and has the potential to affect allocated and/or permitted mineral workings. It is welcomed by North Northamptonshire Council that a Minerals Assessment will be scoped in the Environmental Statement.

### **Cultural Heritage**

In respect of cultural heritage, the North Northamptonshire Council offer the following comments.

#### Built Heritage:

The Scoping Report, largely indicates that the following heritage assets will be scoped in:

- All designated built heritage assets within the scheme and 2 kilometres from its boundary.
- All non-designated built heritage assets within the scheme and 1 kilometre from its boundary.
- All heritage assets within 250 metres from the proposed Cable Corridor.

This approach is agreed, and we welcome assurances from the applicant that there is some flexibility, should it be required.

Paragraph 12.3.1 of the scoping report states - Given the scale of the proposals, a 2 kilometres study area for designated heritage assets is sensible. It is welcomed that the applicant assures flexibility to extend the study area to include specific receptors where appropriate.

Paragraph 12.3.2 of the scoping report states - There are no objections to the proposed 1-kilometre study area for non-designated heritage assets, however it is recommended that the same level of flexibility as outlined in 12.3.1 is applied here also.

Paragraph 12.3.3 of the scoping report states - A study area of 250 metres to assess the impact on designated and non-designated heritage assets during the construction phase is appropriate.

Paragraphs 12.3.9 – 12.3.16 of the scoping report states - The figures appear to confirm the statements made within the written summary; however, it would be helpful if the applicant were to share the corresponding shapefiles with the Preliminary Environmental Information Report (PEIR) and Environmental Statement.

Paragraphs 12.3.21 – 12.3.30 of the scoping report states - The figures appear to confirm the statements made within the written summary; however, it would be helpful if the applicant were to share the corresponding shapefiles with the PEIR and Environmental Statement.

Paragraphs 12.3.31 of the scoping report states - There is no confirmation as to whether the applicant intends to assess and identify any potential, but as yet unidentified, non-designated (built) heritage assets as part of their site visits. There is likely to be several non-designated historic farmstead/ farm complexes, for example.

Paragraph 12.4 of the scoping report states - It is agreed that there is potential for the scheme to have effects upon the settings of built heritage assets during the construction, operational, and decommissioning phase.

Paragraph 12.4.5 of the scoping report states - It is recommended that any vibration assessment extends to built heritage assets within 30 metres of the Cable Corridor, construction access routes, utility diversions, or works areas. It may be the case that heritage assets within the 30 metres buffer could experience impacts from vibration caused by Heavy Goods Vehicle movements, for example, during the construction phase. Commitments and recommendations regarding noise and vibration in terms of

stopping work in the event of unacceptable impacts, monitoring vibration, and reducing vibration (or providing other mitigation) should form part of the Construction Phase Plan.

Paragraphs 12.5.2 – 6 of the scoping report states - All setting assessments should follow the methodology outlined within Historic England's Good Practice Advice in Planning Note 3 (Second Edition) 2017.

Paragraph 12.5.7 of the scoping report states - Care should be taken not to assume that all Grade II listed buildings will be of medium heritage sensitivity; there may be instances when a Grade II listed building should be considered of high (national) heritage sensitivity. For example, some Grade II listed buildings will be listed because they represent a **nationally significant but localised industry**, such as shoemaking in Northamptonshire.

Paragraph 12.5.10 of the scoping report states – This is agreed. However, North Northamptonshire Council senior built heritage consultant notes that a recent judgement in the High Court has clarified that “negligible effects are material, and while the level of change/ harm may be minimal this still engages paragraphs 206, and 208 of the NPPF. (R (James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited [2019])

Paragraphs 12.5.11- 12 of the scoping report states - Notwithstanding the criteria set out here and within Table 12.2, identified harm to all heritage assets should also be expressed in NPPF terms and the three categories of harm: no harm, less than substantial harm (including negligible harm), and substantial harm.

#### Archaeology:

It should be noted that at this stage there is a geophysical survey for most of the proposed panel locations, and trial trenching for some of those areas has started; however North Northamptonshire Council planning lead archaeologist have been clear from the start that the trenching must assess areas which the geophysics suggests are blank, as well as those where archaeological remains are visible.

There are numerous known archaeological sites within the areas surveyed and these include Iron Age and Roman settlement and a Roman villa. The Environmental Statement must provide sufficient information to allow formulation of suitable mitigation for these areas and for any areas where new sites are identified by the trenching. Geophysics has limitations and should never be used in isolation to assess sites; it is best employed as part of a suite of techniques which complement each other. While other options apart from trenching have been mentioned in North Northamptonshire Council planning lead archaeologist discussions there has been no commitment so far to carry out evaluation outside areas where the geophysics has detected archaeology. This must be addressed, and it is not acceptable to push the majority of evaluation to a post-consent phase. A proper assessment of the risks of development is crucial.

While it is often stated that solar farm developments are low impact in respect of archaeology, North Northamptonshire Council planning lead archaeologist is increasingly finding out that this is not the case, as older developments are beginning to require maintenance or replacement of piling which can be detrimental to soil profiles

and to any archaeological features or deposits. Furthermore, the decommissioning of these structures, which is almost always not considered at the time of any application, can be extremely damaging. Therefore, North Northamptonshire Council planning lead archaeologist do not agree with the proposal in table 12.4 to scope out impacts during operation and decommissioning.

It is necessary to be as sure as possible that North Northamptonshire Council lead planning archaeologist have fully assessed the archaeological resource within the site – not only for the panel locations but also for the cabling, infrastructure and landscaping. So far, the latter three are not being discussed with North Northamptonshire Council and although it is realised that there are large zones under consideration for the cabling and that this increases the amount of evaluation needed, but without early evaluation there is a very high risk of selecting cable routes which would be expensive and time-consuming to mitigate.

The scale of these proposals makes it even more important to ensure that North Northamptonshire Council planning lead archaeologist have proper assessment and sufficient information to make sound recommendations. The number of archaeological sites which could be affected is currently unknown, and the extent of the proposals increases the likelihood of there being a site or sites of sufficient significance to warrant designation as a Scheduled Monument. It is therefore crucial that adequate evaluation is carried out, and the results included in the Environmental Statement.

### **Transport and Access**

In respect of transport and access North Northamptonshire Council offer the following comments.

#### Local Highway Authority:

It is noted that a Transport Assessment is to be submitted with the DCO application.

The scope of the Transport Assessment is to be agreed with North Northamptonshire Council and is to include an Abnormal Loads Assessment, Travel Plan, Construction Traffic Management Plan and Public Rights of Way Management Plan.

The application site is likely to be affected by Public Rights of Way. The applicant needs to be made fully aware of their responsibilities in respect of Public Rights of Way which may be affected by the proposed development. When the next stage is reached, North Northamptonshire would be happy to advise.

#### National Highways

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such National Highways work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In respect of the proposed development, the A45 trunk road is the nearest section of SRN.

Having reviewed the information provided within the Scoping Report, it is apparent that the locations proposed for the solar farm are not likely to impact upon the safe and efficient operation of the SRN. National Highways is therefore satisfied that in terms of the operation of the proposed sites, there shall be no adverse impact to users of the SRN.

National Highways concerns relate primarily to the construction phase of the proposal. It is noted that a Transport Assessment is to be submitted with the DCO. The scope of the Transport Assessment is to be agreed with North Northamptonshire Council and is to include an Abnormal Loads Assessment, Travel Plan, and Construction Traffic Management Plan.

Regarding potential cable routing, a range of routing options are identified, from National Highways perspective, where these routes are to be accommodated within, alongside, or beneath the SRN the relevant licences and permissions shall need to be obtained from National Highways.

It is noted that the construction phase and operational phase will be scoped in the Environmental Statement and the decommissioning phase scoped out as it will broadly follow what is set out in the construction phase, i.e. short term and temporary. This approach is considered acceptable.

### **Noise and Vibration**

In respect of noise and vibration the Council offer the following comments.

Table 14.9 of the scoping report details those noise and vibration matters to be scoped in the Environmental Statement and Table 14.10 details those noise and vibration matters to be scoped out of the Environmental Statement. The justification for both is reasonable and agreed by North Northamptonshire Council.

### **Glint and Glare**

In respect of glint and glare North Northamptonshire Council offer the following comments.

No comment to make on this topic.

North Northamptonshire Council are pleased to see that dwellings, road infrastructure and aviation infrastructure is to be scoped in the Environmental Statement.

### **Electromagnetic Fields**

In respect of electromagnetic fields North Northamptonshire Council offer the following comments.

It is noted that no surveys have been carried out regarding electromagnetic fields as part of the Scoping Report and that the route of the cable corridor has not yet been determined. The Scoping Report concludes that electromagnetic fields from the BESS, substations, transformers, and Photo Voltaic inverters will be scoped out of the Environmental Statement.

Human Health is a material consideration and North Northamptonshire Council consider that given the detail of the cable corridor routing and the siting of the BESS, substations, transformers, and Photo Voltaic inverters have not been finalised, this should be scoped in.

### **Air Quality**

In respect of air quality, North Northamptonshire Council offer the following comments.

The scope for this topic is agreed providing that mitigation measures are reported in the Construction Environmental Management Plan.

### **Socio-economics, Tourism and Recreation**

In respect of socio-economics, tourism and recreation North Northamptonshire Council offer the following comments.

Paragraph 18.3.1 of the Scoping Report notes that the scale and geographic distribution of the Scheme means that its effects have the potential to impact a significant geographical area and the associated population. It is noted that agricultural and farming practices and activity will be explored within the Environmental Statement and human health impacts as a result of changes to the socio-economic and recreational environment will also be assessed in the Environmental Statement. The conclusions set out in paragraph 18.5 of the scoping report are considered appropriate in terms of scoping in (socio-economic impacts during construction, during operation and during decommissioning and impacts on tourism and recreation during construction and operation). However, North Northamptonshire Council disagree with paragraph 18.5.2 in that crime should be scoped out of any stage.

The rate of reported offences on solar farms doubled from 2021 to 2022, which was principally driven by an increase in solar panel theft. The rate of reported offending increased by a further approximately 24% from 2022 to 2023. A significant increase in solar cable theft was slightly offset by a reduction in solar panel theft. So far, 2024 trends are mirroring those seen in 2023. However the volumes of cable that have been targeted this year are consistently very large, which has not been seen in recent years on the same scale. There have been multiple offences where over 50 kilometres of cable have been stolen in one night. It should be noted that repeat victimisation of solar farms is common. Also, solar farms under construction are being targeted. This is because cable is delivered on drums and panels in pallets, which make it easy for offenders to manoeuvre and steal large volumes in a short space of time. This information is from OPAL (National Intel for Derious Organised Acquisitive Crime).

It is imperative that the Applicants do integrate security and crime prevention into the development from the outset, not just consider it. This will prevent the Applicants from becoming victims of crime, reducing the performance of the site, cost them money as well as putting personnel in danger.

Crime should be scoped into all stages, and the applicants should provide a security and crime prevention strategy for the construction phase and a security and crime prevention statement for the finished site.

### **Human Health and Wellbeing**

In respect of human health and wellbeing North Northamptonshire Council offer the following comments.

It is agreed that elements of this section will be covered in both a section of its own and touched on within other sections within the Environmental Statement such as landscape and visual impact, climate change or transport and access. Table 19.5 of the scoping report (Health Effects to be scoped in) is considered reasonable and accepted. Table 19.6 of the scoping report (Health Effects to be scoped out) is considered reasonable and accepted.

### **Arboriculture**

In respect of arboriculture North Northamptonshire Council offer the following comments.

It is noted that a Preliminary Arboricultural Impact Assessment and Outline Arboricultural Method Statement will accompany the DCO submission once the final layout and construction details are available, and all surveys completed. There is also the presence of Ancient Woodland in the North Northamptonshire Council sites vicinity which are 'irreplaceable habitats'. The Scoping Summary at Table 20.4 of the Scoping Report is considered reasonable and fair subject to the submission of an Outline Arboricultural Method Statement and a Landscape and Ecological Management Plan to support the DCO submission.

### **Agricultural Circumstances**

In respect of agricultural circumstances, North Northamptonshire Council offer the following comments.

North Northamptonshire Council are pleased to see that soils and agriculture assessment will be scoped and included in the Environmental Statement.

### **Other Environmental Matters**

#### Lighting

Currently, it does not appear that there will be any permanent exterior lighting on any of the sites in question. It is agreed that this does not have to be a standalone chapter, however it will need to be addressed in other relevant chapters (for example landscape, biodiversity, transport etc).

#### Major Accidents and Disasters

The scope for this topic is agreed however the risk of battery fire/explosion should be clearly addressed within the Environmental Statement. It is noted that this is picked up in the Air Quality and Socio-Economic chapters.

#### Waste

The proposed approach to this chapter is agreed by North Northamptonshire Council.



## Telecommunications, Utilities and Television Receptors

The proposed approach to this chapter is agreed by North Northamptonshire Council.

### Planning Obligations

This application is a Scoping Opinion therefore at this stage no detailed comments are provided regarding planning obligations. North Northamptonshire Council can however confirm that, should a DCO application progress, it may seek planning obligations to mitigate the impact of the development.

### **Summary**

Subject to the detailed comments above, North Northamptonshire Council are broadly agreeable to the proposed scope and methodology of the Environmental Statement. However, key issues or proposed approaches to the Environmental Statement preparation which North Northamptonshire Council do not support from the information presented (or where additional clarity is required) are:

1. The Environmental Statement provides full detail regarding alternatives, including of those within the Sites selected.
2. The Environmental Statement should consider the cumulative effect of other large scale solar schemes that are currently in operation in the North Northamptonshire Council District.
3. The Environmental Statement should refer to all relevant Local Plan policies and these should be considered and included in future assessments.
4. All viewpoint photography to be presented as Type 1 visuals in accordance with the Landscape Institute Technical Guidance Note 06/19, Visual Representation of Development Proposals. It would also be advised that a number of the photographs are presented as Type 4 photomontages to help guide our review of the scheme and its impact on visual receptors.
5. The Environmental Statement should include a number of photomontages at 60+ years to show how mitigation measures will benefit the landscape. Ideally, these would show the view after the development has been decommissioned as this will demonstrate the remaining long-term legacy of the scheme.
6. Further clarity is required regarding the landscape value criteria definitions in Table 7.2.1.3: Landscape Receptor Value.
7. Sequential views are required when assessing visual effects along transport and public rights of way receptors.
8. Night-time effects should be scoped into the Environmental Statement.
9. Local landscape character needs to be assessed and included in the Environmental Statement..
10. Existing vegetation to be mapped and any loss of or impacts to hedgerows, trees or woodland which are likely to result in significant effects on landscape and visual amenity are assessed in the Environmental Statement..
11. Full ecological surveys undertaken for the cable corridor finalised routes.
12. The proposal secures at least 10% net gain in biodiversity to ensure that the value of the development exceeds the pre-development on site habitat value by at least 10%.

13. It is recommended that any vibration assessment extends to built heritage assets within 30 metres of the Cable Corridor, construction access routes, utility diversions, or works areas.
14. The Environmental Statement must provide sufficient information to allow formulation of suitable mitigation for the numerous known archaeological sites within the areas surveyed and for any areas where new sites are identified by the trenching.
15. Evaluation outside areas where the geophysics has detected archaeology is required. It is not acceptable to push the majority of evaluation to a post-consent phase.
16. In terms of archaeology, North Northamptonshire Council planning lead archaeologist do not agree with the proposal in table 12.4 to scope out impacts during operation and decommissioning.
17. The archaeological resource within the site must be fully assessed and included in the Environmental Statement., this includes the cabling, infrastructure and landscaping.
18. The scope of the Transport Assessment is to be agreed with North Northamptonshire Council.
19. Electromagnetic fields from the BESS, substations, transformers and PV inverters should be scoped in the Environmental Statement.
20. The risk of battery fire/explosion should be clearly addressed within the Environmental Statement.
21. Crime prevention during construction, during operation and during decommissioning should be scoped in.
22. Wildlife risk and impact on biodiversity should be scoped in.
23. Impacts on urban heat on biodiversity needs to be scoped in.

This letter forms a response from North Northamptonshire Council on the applicant's scoping opinion for Green Hill Solar Farm NSIP and would be grateful if the comments contained within it can be considered as part of your formal scoping response.

Yours sincerely



George Candler  
Executive Director of Place and Economy