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FAO Lesley Giles

Ask for: Mrs Nicola Thompson
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Our Ref: NW/24/00448/EXT
Your Ref:
Date: 17 September 2024

Via email: info@greenhillsolar.co.uk

Dear Ms Giles,

**RE: Draft Statement of Community Consultation (SoCC)
AT: Green Hill Solar Farm**

I write further to your letter received on 12 August 2024 seeking North Northamptonshire Council's (NNC) comment on the draft Statement of Community Consultation (SoCC) (August 2024) for the Green Hill Solar Farm.

NNC has liaised with the inhouse communications team and the following Parish/Town Councils and Ward Councillors:

Ward Councillors

- Irchester
- Earls Barton
- Croyland and Swanspool
- Finedon
- Irthlingborough
- Higham Ferrers
- Rushden Pemberton
- Hatton Park
- Brickhill and Queensway
- Rothwell and Mawsley
- Burton and Broughton

Parish/Town Councils

- Sywell Parish Council
- Mears Ashby Parish Council
- Wilby Parish Council
- Earls Barton Parish Council
- Grendon Parish Council
- Easton Maudit Parish Meeting

- Bozeat Parish Council
- Irchester Parish Council
- Little Harrowden Parish Council
- Hardwick Parish Council
- Wellingbrough Town Council
- Great Doddington Parish Council
- Wollaston Parish Council
- Strixton Parish Council
- Ecton Parish Council
- Loddington Parish Council
- Mawsley Parish Council
- Great Cransley Parish Council
- Broughton Parish Council
- Pytchley Parish Council
- Orlingbury Parish Council
- Walgrave Parish Council

Any comments received have been incorporated into this consultation response.

Comments on Section 4: The Proposed Development

Paragraph 4.1 – This paragraph reads as though the proposed project will consist of a (singular area) solar farm and a battery storage facility.

- It is suggested that this paragraph addresses that the proposed solar farm is spread over several sites (A – G and BESS) within the districts and each area is only connected via the cable route.

Comments on Section 5: Environmental Impact Assessment (EIA)

Reference is made to a project website. Confusion has been raised over whether this is the PINS Green Hill Solar Farm page or the Green Hill Solar Farm website?

- Please be clear which website it will be? It should be the Green Hill Solar Farm project website.
- It would also be helpful if provisional submission dates are provided here for the submission of the Development Consent Order (DCO) application and the Preliminary Environmental Information Report (PEIR) consultation.

Comments on Section 6: Engagement Approach and Early Engagement (Non-Statutory Consultation)

Paragraph 6.3 - With regard to the political stakeholder's co-design workshop, some attendees felt that that they were more of an information gathering exercise for the developer than being a truly cooperative workshop or consultation. They felt that 'the scheme itself was presented as though any concerns would be disregarded because the planning system would allow the proposal'. This has raised concern amongst stakeholders that further consultation responses will also have little or no influence on the proposals.

- It is suggested that a summary report of the workshops (the June 2024 newsletter does not provide a sufficient summary) is published on the Green Hill Solar Farm

project website including the feedback received as soon as possible. This was agreed in March 2024 at the workshops and has yet to be actioned.

Comments on Section 7: Statutory Consultation

Paragraph 7.1 – This states that the consultation will take place ‘for six weeks between November 2024 and January 2025’. However, for a large portion of this time, many people are preoccupied with preparation for and enjoying Christmas and New Year celebrations and events. This includes travelling to spend time with relatives and friends over the Christmas and New Year period. It is also at a time of year when the weather can restrict travel. It is considered that this timing could severely reduce the opportunity for people to participate in the consultation process.

- It is suggested that this consultation period is either extended or moved to an alternative 6-week period rather than taking place for just 6 weeks during the proposed busy time over the Christmas and New Year holidays.

Paragraph 7.2 – This paragraph states that visual representations will be presented, and feedback sought on them.

- It is suggested that comments from consultees within the Environmental Scoping regarding viewpoints is incorporated into the selected viewpoint list.

Paragraph 7.3 – This states that the Public Consultation Zone (PCZ) will be restricted up to 1-kilometre from the project site. Given the size, scale and extent of the scheme this seems unduly restrictive. It is considered that residents within the wider area will experience a substantial change in the character of the landscape in which they live, work and enjoy and so should also be included in the consultation.

- It is suggested that the consultation reaches out beyond this 1-kilometre zone. Not necessarily via letter but could be by other means (flyers, posters/notices on village hall notice boards etc). *Some Parish Councils suggest a 10-kilometre minimum PCZ area should be considered.

Figure 1 is too small and unclear.

- It is suggested that figure 1 should be clearer and include more detail (including the red line(s))

Within the list of what non-statutory groups would be consulted, Parish Meetings need to be included. This is because, for example, Easton Maudit, has a Parish Meeting and not a Parish Council.

- It is suggested that Parish Meetings are included in the non-statutory consultee list.
- Within the non-statutory consultee group, community groups, voluntary organisations, and hard-to-reach groups etc are included. However, there is no mention of the general public, wider than the PCZ. How is the general public intended on being reached? How are ‘hard-to-reach’ groups being identified?

Paragraph 7.4 – This sets out how you are proposing to consult. Given the scale of the development and number of communities impacted, 4 consultation events and 3 webinars are considered low.

- It is suggested that the number of consultation events and webinars are increased. Webinars should also include weekends and evenings to accommodate working families.
- Could webinars be recorded with a recording available on the Green Hill Solar Farm project website?
- Walgrave Parish Council would like Walgrave to be considered as a host for one of the in-person consultation events.
- It is suggested that the consultation event locations chosen are accessible and can be reached by both public and private transport.
- Is Livestorm a common platform for webinars? It is suggested that an alternative more common and accessible streaming platform is considered for the webinars.
- Can the format/approach to Questions & Answers during the webinars be clarified i.e. how many questions will be answered and will questions/answers be visible to all attendees? Will the Questions & Answers detail be available on the Green Hill Solar Farm website following the webinars?
- The requirement to register is likely to be a barrier to some attendees and it is unclear why this is needed. Please can this be reviewed? As it is a webinar there should be no limit to attendee numbers, surely providing a link to the webinar for those interested to just join on the day is sufficient.
- It is appreciated that the Preliminary Environmental Information Report (PEIR) will be a substantial document, however it is considered that a printing cost of £0.35 per page is high and will be a specific barrier to the hard-to-reach groups identified in the draft Statement of Community Consultation. As copies will be available at some locations, then perhaps the maximum cost to anyone that is unable to access these locations should be postage only. Please could this be considered?
- Irchester Parish Council offer Wollaston Library as a host venue as a local information point.
- Some smaller parish councils have requested that a hard copy of all relevant documentation should be provided directly to them free of charge (prior to when a consultation begins – they suggest 10 days prior). Could this please be considered?

Paragraph 7.5 – This section is regarding promoting the consultation. It is considered that for a proposal of this scale, adequate coverage and notice needs to be provided.

- There does not appear to be any plan to promote to the wider public across NNC. On this basis, could additional press releases in a National Newspaper be considered? Perhaps one 14 days in advance and one 7 days in advance? Can this include the web address for the consultation?
- Could the posters also be in an electronic format so that other stakeholders (such as parish and town councils) can easily use them to inform social media platforms such as their Facebook pages, on their websites or within their newsletters etc?
- It states that stakeholder briefings would be considered on an ad hoc basis. Please could clarity around the criteria for such a meeting to be agreed be set out in the Statement of Community Consultation?
- It is suggested that stakeholder briefing sessions to key stakeholders is essential rather than optional.
- Posters and leaflets should include a QR code to the Green Hill Solar Farm website documents.

Paragraph 7.8 – This paragraph is regarding ‘Hard to Reach Groups’ and there is very general information about these groups and how they will be identified.

- It may be part of next steps but please ensure that identifying hard to reach groups will be in liaison with the local authorities.

Paragraph 7.9 – This paragraph discusses the proposed enquiry channels. Parish Councils have raised that the ‘substantive response issued within 10 working days of receipt’ has previously not been adhered to.

- It is suggested that a ‘next steps’ detail is provided in case a response is not received within the timescales set out in Table 4.

Comments on Section 8: Responding to Consultation

Paragraph 8.2 – This note how feedback will influence the designs of the solar farm. Some stakeholders have raised confusion over this sentence.

- Please could it be clear here, that it is the feedback on the design and potential impacts of the solar farm that will be taken into consideration and that it is not just accepting solar panel design comments.

It states in this paragraph that, ‘all responses submitted during the statutory consultation will be responded to within the Consultation Report’. It is unclear how this will be enforced?

- It is suggested that an appendix is included listing those that contributed to the Consultation Report so that contributors can easily see that their response has been acknowledged and included.

North Northamptonshire Council consider that this draft Statement of Community Consultation is compliant with Section 47(1) of the Planning Act 2008 and Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

This letter forms a consultation response from North Northamptonshire Council on Island Green Power’s proposals of how Island Green Power intend on consulting with the local community for Green Hill Solar Farm Nationally Significant Infrastructure Project (NSIP) during the Pre-application stage. NNC would be grateful if the comments contained within it can be considered as part of your plan for consultation.

Yours sincerely



George Candler
Executive Director of Place and Economy