

## Questions for feedback - Solar Farm

### How would you describe your interest in our proposals?

Statutory Organisation - Grendon Parish Council

### Section 2: General questions

#### 1. Please indicate whether you agree or disagree with the following statements:

Climate change is an important issue - Blank

Energy security is an important issue - Blank

Moving away from fossil fuel use for electricity generation is important - Blank

The UK needs more renewable energy - no answer

The UK needs more energy storage - no answer

#### Please tell us the reasons for your responses to question 1 and any other comments.

We have not submitted a response to the above because to do so would be to provide a blanket approval of all and every renewable energy proposal, type, place and method. An appropriate type of renewable energy based on geographical location should be determined. For the UK wind power, both on and offshore, is the most effective and productive.

Whilst solar has its place in the renewable energies market, even in the UK, it is not as beneficial or potent as wind; comparatively it is much less effective than both off and onshore wind. The scope for energy production through solar is limited in the UK due to our weather and topography.

Solar energy production is best placed on brownfield sites, industrial areas, new housing and residential areas, car parks and roads where it combines a reduction in hotspots, increases heat and energy retention based on the subflooring upon which it stands and limits the exponential increases in flood risk caused by concreting absorbent ground and removing woodland, trees and hedgerows.

## **2. Please tell us your views on solar energy.**

Neutral

### **Please tell us the reasons for your responses to question 2 and any other comments.**

Solar energy is less productive in the UK than wind.

Offshore wind has less impact on limited land capacity and food security.

Only one wind turbine is needed to match approximately 48,704 solar panels to generate the same amount of electricity per kilowatt-hour (kWh).

Wind requires much less land usage, gives greater food security and there is less destruction for cabling.

You state in your documents that “other forms of renewable energy, such as tidal power, offshore wind, and hydroelectric storage, were not considered viable due to the inland location and associated costs.” Nowhere have you considered the more appropriate use of onshore wind power. We challenge that the research is based on flawed, inadequate and incomplete evidence because they have not included all forms of renewable energy including those most beneficial to the UK given our weather and topography.

- One wind turbine per field would lead to a similar, if not greater, output and not impact food security because continued use of agricultural land would be possible with both arable AND pastoral farming.
- When it comes to generating usable electricity, wind turbines typically have an efficiency range of 20% to 40%, outperforming solar panels, which exhibit an average conversion efficiency of 15-20%.
- Additionally a wind turbine generates 4.64 grams of CO<sub>2</sub> per 1 kWh, whereas a solar panel produces 70 grams of CO<sub>2</sub> per 1 kWh.
- The manufacturing process of wind turbines is more environmentally friendly than solar panels.
- Wind turbines also hold several environmental advantages as they produce no emissions, require no water for cooling, and have a relatively small physical footprint.
- Wind turbines would produce no negative impacts for the equine industry or waterways, watercourses or lakes and floodplains.
- Wind turbines are better suited for rural areas.

**3. Please tell us your views on solar farms as part of the renewable infrastructure needed to meet the UK Government's commitment to achieving net zero carbon emissions by 2050?**

Completely against

**Please tell us the reasons for your responses to question 3 and any other comments.**

Whilst we are not against solar energy as stated in our responses to questions 1 and 2 above, solar farms are an inappropriate use of land.

This application is proposed to be on 100% BMV farmland.

Solar energy is best produced on brownfield sites, industrial/logistics areas, peoples homes and roads and road/rail sides, not surrounding conservation villages e.g Easton Maudit and Mears Ashby . Wind farms are more appropriate in rural areas as they complement and work with the production of food rather than removing the capacity of most forms of farming.

The loss of high grade BMV land has a significant impact nationally and locally – the planning guidance is to preserve such land unless there are no other alternatives available. As Northamptonshire is in the top 3 areas across the UK for industrial areas and logistics then those brownfield sites must take priority over high yielding rural agricultural land with high flood risk which is not the case in this location.

The reports have not provided clear evidence that other sites could not house this industrial solar developments, and have not proven that they could not be housed on lower quality land, such as brownfield or industrial/logistics sites, with the exception of stating that no other landowners were receptive to renting their land for the proposed purposes and that the development must be within 20km of a working BESS.

Solar farms, specifically those on BMV land and in this instance being built on/near/adjacent to nature reserves, floodplains and scientifically significant (locally, nationally and INTERNATIONALLY) areas of wetland reduces biodiversity and increases risk to the environment.

The current proposals do not adequately mitigate the potential for significant adverse effects on SSI's, SPA, RAMSARS and other nature reserves due to their proximity to the BESS and flooding, habitat fragmentation, toxic runoff/fumes, dust, pollution, soil compaction, long term degradation. The proposed buffers and pollution control measures are inadequate.

The mitigation measures and habitat creation plans are insufficient to compensate for the losses from construction, operation and decommission.

The buffer zones around significant areas of woodland are not of sufficient size.

There is inadequate Biodiversity Net Gain (BNG) for this development. We question that the project will 'leave(s) biodiversity in a better state than before' , especially not to the minimum of a 10% gain.

### **Section 3: Views on the project proposals**

#### **4. Based on the information presented as part of the statutory consultation, how supportive are you of our proposals for Green Hill Solar Farm?**

Completely against

**Please tell us the reasons for your response to question 4 and indicate if you have a comment on a specific site (e.g. Sites Green Hill A–G and Green Hill BESS).**

Inadequate and incorrect assessments and consideration of alternative layouts.

It is stated in the documentation that the layout of the solar panels, substations, and Battery Energy Storage Systems (BESS) has been iteratively refined based on environmental assessments, stakeholder consultations, and technical feasibility with the design aiming to minimize visual, ecological, and cultural heritage impacts while maximizing energy generation.

The BESS is adjacent to waterways of significant environmental importance (Upper Nene Valley Gravel Pits SPA, SSSI, Ramsar, the Nene waterway and nature reserves).

The BESS location will lead to a significant risk of polluting the waterways and destroying biodiversity, wildlife, land quality and ecology.

The proximity of Green Hill BESS to these sites raises concerns about potential degradation impacts from sediment, dust, and contaminants during construction.

The risk of battery fire during operation and subsequent chemical, heavy metals, contaminants and pollutant discharge directly into the water table is SIGNIFICANT as toxic runoff/discharge cannot be fully contained. The pollutants will be able to enter waterways either directly or by dispersal through soil and the underground water table.

The current proposals are inadequate and will be unable to mitigate the potential for significant adverse effects on these internationally and nationally important sites in the case of regular and significant/risk to life flooding.

The inadequate road and transport links to the location will also severely limit and impede access for fire vehicles due to the inadequate road and transport links to the area which will substantially increase the time for emergency vehicles to reach the site.

Negative impact on and risk to rare and internationally significant habitats and species including RAMSAR, SPA, SSI, Mineral Safeguarding Area (MSA), bats, voles, rare ground nesting birds. The ecological assessment was inadequate - measured only over 1 year this volume of data is insignificant to secure the biodiversity and security of significant species and habitats.

The PV sites and cabling corridor are in unacceptably close proximity to heritage sites and conservation housing areas. There is significant and major risk of structural damage due to increased HGV and abnormal loads throughout construction phase and lifespan (maintenance and replacement).

Your presentation informed us that in 15yrs the proposed mitigating landscaping would be effective – which means that food and shelter for the wildlife will be lacking during that time. You also state that you are using native species, which if this does not include evergreen species then the solar industrial site will be visible for at least 6 months of the year.

The land categorisation is 66% prime agricultural land (BMV gradings 1, 2 and 3a) with the remaining 34% 3b meaning that 100% of the land is prime farming land.

The flood categorisation is incorrect and out of date. The majority of the sites for PV's, cabling and BESS are very high flood risk areas. The 2024 Section 19 report is due to be published early 2025 and MUST be consulted with appropriate adjustments made to rectify the current classifications. For example Greenhill F is listed as being located in flood zone 1 (low risk of flooding), with limited areas in flood zone 3 (high risk of flooding) but 9 fields are entirely, significantly or partially in flood zone 3 which is not a 'limited area'.

Inadequate road and transport links. The construction, maintenance and decommissioning will lead to significant and major impacts on working residents and school children on already weak and congested roads.

The area is significantly rural with a high prevalence of the equine and tourism industry which are likely to be negatively impacted or closed as a result of inadequate and impacted PROWs.

Significant impact on aviation safety due to the position of the proposed solar farm development, particularly at Sywell Aerodrome, William Pitt Airfield, Easton Maudit Airfield, Pitsford Airfield, and Hold Farm Airfield. Because so many aviation sites are affected, there is an urgent need for more detailed assessments and robust mitigation measures to ensure aviation safety is not compromised and negatively impacted from glint/glare with high risk to life for pilots/passengers.

Cumulative effects. High number of smaller solar developments in planning which, in combination will industrialise the countryside.

## Section 4: Design proposals

5. Below we outline the design principles guiding the Green Hill Solar Farm scheme. Please let us know which of them are most important to you by ticking the relevant boxes below.

- Green Hill Solar Farm will be designed with the aim of being in harmony with the surrounding natural and built environment.
- We are committed to mitigating impacts and minimising adverse effects on the environment throughout the Scheme's lifespan including at decommissioning.
- We will create new habitats and improve biodiversity. Soil will be restored to as good, if not better quality, by the end of the Scheme's lifespan.
- The Scheme will be designed to be flexible so it can adapt over time, responding to new technologies and climate change.
- We will design the Scheme so that it has reduced impact on air quality, traffic, noise and safeguards the health and safety of local residents.
- We will be sensitive to local heritage and create buffers with landscape screening to protect the landscape – including built and natural environment.
- We will work in collaboration with stakeholders to promote and protect responsible land use.
- We will prioritise keeping public rights of way open and undisrupted throughout the project's life. Where possible, we will enhance local walking routes and paths.

**RESPONSES - ALL IMPORTANT with the exception of the scheme responding to new technologies which may lead to more construction/transport and further environmental impacts throughout the lifetime)**

### Do you have any comments on the design principles?

You have provided no details to guarantee the above statements will be true and upheld through the construction, operation (and maintenance/replacement) and decommissioning stages. If sold off, GREENHILL must write into the contract that they will provide adequate funding (in line with inflationary impacts) for the above to be met with specific details for the purchaser to follow.

There is no harmony with the environment in the design statement - solar panels surrounded by security fencing, CCTV and night security lighting, inadequate buffer zones, inappropriate site selection (proximity to RAMSARS/SPAs/SSIs/Nene waterway).

The report is misleading stating that the 7 sites are within 10k of the sites of specific or internationally significant wetlands. However, the fact is that the BESS, which is the most significant risk to these designated as significant nature reserves, is planned to be directly adjacent to or built on top of said habitats. This location should never have been considered given the proximity to SSI's, RAMSARs, SPAs, Nene River and nature reserves; additionally ancient woodland and hedgerows are being destroyed for cabling. There would be no need to create new habitats unless the current ones are being destroyed.

There is no guarantee that money will be set aside for 'bringing soil quality to as good as or better' and there are no detailed plans establishing the protocols to enable this. 66% of the soil is graded as 1, 2 or 3a and the remainder grade 3b. This level of quality cannot be returned without major and significant cost after in excess of 60 years of heavy pollutants, toxins, plastics.

The phrase "enhancing local walking routes 'where possible'" is too vague and insufficient. This enhancement should be a mandatory part of the proposal, not just an optional feature. Additionally, the presence of security fencing, lighting, and CCTV will result in constant surveillance, making it impossible for anyone to walk without being monitored or feel they are walking in a prison yard.

Flood risk assessments and mitigations listed are inadequate and in question. References to out of date flooding (1947) with no recent data has been considered or presented.

Whilst the BESS infrastructure may be adequately waterproofed to withstand the effects of flooding as a unit the extensive concrete footings will increase the risk of flooding and soil degradation to the surrounding areas.

On the PV sites, it is stated that the energy of the flow from the surface of the panels is likely to be greater than that of the rainfall. This could result in the erosion of the ground with rivulets forming and increasing the rate of rainwater runoff. The proposed mitigation is grass and wildflower planting but for this to be successful it requires regular maintenance and upkeep. No evidence that this is planned.

Unless the attenuation ponds and other water systems are hermetically sealed the installation of an automatic actuating valve, triggered to be locked in an emergency, will be insufficient to guarantee no contaminants will be discharged into the internationally significant watercourses. Without sealing in all the water and using non-permeable sub bases there can be no guarantee that contaminants are not regularly entering the water table through soil transfer and then on into water courses and ultimately the drinking water. This is due to the immediate proximity to the wetlands and rivers and resulting high local water table.

Insufficient mitigation measures and easement areas to counteract soil compaction and resulting flood risk. The reports provide no evidence to support the suggestion that there will be minimal increase in impermeable area as a result of flooding/runoff soil compaction.

Buffers and landscape screening will take decades to effectively reduce negative visual impact. The visual impact may never be counteracted due to the hilly topography of the sites. The report indicates significant adverse effects on the local landscape character, particularly within the insufficient 1km study area. The impacts identified will be widespread and occur throughout the proposed site, destroying the rural character and industrializing the landscape.

- The solar farm and BESS will be positioned on land visible from Grendon and on 2 of 3 of the roads travelling out of Grendon by car, on foot, bicycle, and/or horseback. These routes will take you past large arrays of solar panels and the substation/battery store.
- Easton Maudit will be surrounded on three sides by the solar farm, with panels positioned on land visible from the village. The village will be enclosed by solar panels in a continuous arc of 290 degrees, spreading up to Bozeat and Strixton leading to significant visual and environmental impacts from the solar farm and significantly detrimental to the historic nature of these villages
  - Grendon is mentioned in the Domesday Book of 1086 and has significant cultural assets and houses
  - Easton Maudit has a historic grade I church that will no longer benefit from the views that so many visitors come to enjoy
  - If it is not acceptable to have this solar farm close to the Castle Ashby House, then it is unacceptable impact on similar cultural assets to the local and wider tourist community

There are numerous PRoWs, including NN\_TN\_7, NN\_TF\_3, and MK\_Lavendon\_002, which will experience major to moderate adverse visual impacts. The report highlights that the visual impact of these solar panels will be insignificant within 15 years. 15 years is one third the proposed lifespan of the site which is majorly inadequate and absolutely unacceptable. Due to the topography the visual impacts will remain significant from these public rights of way. Additionally, there will be a huge impact on Northamptonshire's cultural heritage and international events like the Waendel walk which travels through these rights of way and attracts hundreds of international visitors and approximately 6000 tourists to the areas; ruined by this industrial development. Information on the Waendel walk has not been considered in this review – there is a community group who have not been engaged at all – [www.waendel.org.uk](http://www.waendel.org.uk).

The design proposals state that 'where possible' walking routes will be enhanced. This is not a nice to have but must be a guaranteed requirement because the affected PRoW are heavily used.

The significant and long-lasting disruption to PRowS is unacceptable, particularly those intersecting with construction routes. Detailed assessments and robust mitigation measures to ensure public safety and accessibility of these routes for non-motorised users are missing and must be addressed.

The reports list 36 PRow as being major/moderate or moderate/adverse affected throughout construction and into year one. This is considered so SIGNIFICANT an impact from a legal standpoint that the project must not be given permission to continue.

Cumulative Effects: The cumulative visual impact with other developments, such as the Grendon Lakes BESS and many other planned solar projects would be significant. This cumulative impact has not been taken into account sufficiently, it has not assessed the compounded negative effects on the landscape and visual amenity.

If the Scheme is to be designed to be flexible and adapt over time to respond to new technologies and climate change then it is likely that the impact from continued development throughout the life of the project will continue to significantly impact local residents, transport systems and the environment. Impacts must stop and therefore this should not be considered.

The design proposals would not be necessary if the prime agricultural land was not proposed to be covered in glass, concrete, plastic and batteries.

The effectiveness of public and stakeholder engagement with the planning process has been inadequate. Please see our responses within the last questions. A design proposal principal aimed at improving stakeholder collaboration would require a significant improvement and innumerable changes to be meaningful and productive.



**6. What environmental issues relating to the proposals are most important to you? Please tick the relevant boxes below.**

**Response - all 7 of the above**

**Please tell us the reasons for your response to question 6.**

Ecology and Diversity

1

The BESS is proposed to be within several metres of, adjacent to or sitting upon the Upper Nene Valley Gravel Pits SPA, SSSI, and Ramsar sites. This close proximity is significantly concerning:

- potential degradation impacts from sediment, dust, and contaminants during construction.
- battery fire and subsequent chemical discharge risk – runoff cannot be fully contained and would contaminate, pollute and destroy the ecosystem and biodiversity of the local lakes and rivers
- current proposals are unable to mitigate the potential for significant adverse effects on these internationally and nationally important sites
- The area is all floodplain leading to a majorly significant risk of contamination runoff due to coalescence with the flood water
- Inadequate, poor and roads/bridges with limited accessibility will impede access for fire and rescue vehicles.

2

National Statutory Designated Sites of Badsaddle, Withmale Park and Bush Walk Woods SSSI, and Bozeat Meadow SSSI (within 300m) would suffer habitat fragmentation and pollution.

The proposed buffers and pollution control measures are inadequate.

Designated International and national ecological and geographical sites have been deemed unsuitable sites for a development of this type. In addition to the SSSI/SPA/RAMSAR site of Nene valley gravel pits and Horn Wood we have the Roman Villa at Easton Maudit at the centre of the proposed development.

3

Arable Field Margins and Other Neutral Grassland will be temporarily lost during construction with potential and significant long-term degradation resulting. The mitigation measures and habitat creation plans are insufficient to compensate for these losses.

4

Ancient woodland, trees and hedgerows are at significant risk from dust, pollution, and root compaction during construction with buffer zones of insufficient size

5

Impact on Species

The cumulative removal of trees for the cable routes will lead to the loss of roosting sites for bats and the impact of artificial lighting during construction will significantly affect local bat populations. The effectiveness of proposed mitigation measures, such as buffer zones and sensitive lighting strategies are inadequate.

Habitat fragmentation and degradation from construction activities, particularly at watercourse crossing points, will have significant negative impacts on local Otters and Water Vole populations. The effectiveness of proposed mitigation measures, such as buffer zones and pollution control are insufficient, due to the immediate proximity of the sites to the waterways.

There will be significant displacement of at risk species like skylark, yellow wagtail, and lapwing from their native nesting sites. The effectiveness of proposed off-site mitigation measures are inadequate.

6

The proposed measures are not sufficient to ensure no net loss of biodiversity and guarantee a minimum BNG gain of 10%.

Landscape and visual

The report identifies several residential properties that will experience significant visual impacts during construction and operation (e.g. New Lodge Farm, Tithe Farm, and properties along Highfield Road).

We strongly object based on the significant adverse effects on residents' visual amenity and the potential for reduced property values.

If the impact is so significant that the panels cannot be close to cultural heritage assets like Castle Ashby House then that impact should be considered as equally or more significant for those people living within metres of the pv sites.

The report proposes embedded mitigation measures such as removing panels from sensitive areas and using non-intrusive concrete feet. The effectiveness of these measures is contingent on the completion of ongoing assessments. However the reliability of these measures with incomplete data is significantly limited. This submission is premature as not all assessments have been completed or taken into account meaning mitigation plans are insufficient or potentially incorrect.

## Cultural Heritage

1

The proximity to heritage assets (e.g. Grendon Hall, Easton Maudit Church and Castle Ashby) and their settings will also be adversely affected. These heritage sites are of great local and national importance, and the potential visual intrusion due to such close proximity will be hugely impactful. These sites have not been fully considered in the reports to date.

2

While the report outlines embedded mitigation measures like buffers and planting the proposed measures look to be ineffective and insufficient. For instance, the growth rates and effectiveness of proposed hedgerows and woodland planting in screening the development will take many years. In addition, it will not mitigate the views from the historic churches in Grendon or Easton Maudit or from the properties in these historic villages. Nor will the mitigation reduce the impact from the public rights of way with the solar sites remaining clearly visible from all hillsides. The mitigation measures are unacceptable.

3

The Visual Impact will remain in the long-term with significant visual impacts remaining significant at Year 15. The long-term adverse effects despite proposed mitigation will mean adverse effects for decades, potentially throughout the life of the project until decommissioning.

4

The reports note indirect impacts on the settings of heritage assets but the cumulative impact on cultural heritage has not been adequately considered.

5

The proposed landscape mitigation measures (e.g., planting of shelterbelts, new hedgerows, meadows) are intended to reduce visual impacts but are likely to be insufficient to mitigate the impact on the setting of heritage assets. Due to the topography of the landscape it is likely to take decades or be end of life before vegetation matures significantly to mitigate visual and cultural impact.

## Agricultural

1

The conversion of very high-quality agricultural land to solar farms is contested, especially given that 100% of the land proposed for this development is BMV grades 1 to 3.

2

The Agricultural Land Classification Map East Midlands Region (ALC005) produced by Historic England places all of the land, especially around the villages of Mears Ashby, Grendon, Easton Maudit in the highest grades of best and most versatile land (34% at grade 3b still BMV). The report is inaccurate providing a figure of 60% only. The reports do not substantiate these figures or why they differ so significantly to the publicly available data from reputable sources. The figures from the developer should not be relied upon to be truthful.

## Glint and Glare

1

The position of this solar farm has a significant impact on aviation safety, particularly at Sywell Aerodrome, William Pitt Airfield, Easton Maudit Airfield, Pitsford Airfield, and Hold Farm Airfield.

It is a necessary requirement for more detailed assessments and robust mitigation measures to ensure aviation safety is not compromised.

2

The proposed mitigation measures, such as vegetation screening and opaque fencing, will not be sufficient to address the full extent of glint and glare impacts, as many residential properties, sites of historic interest, public rights of way will be easily able to see the solar farm panels, due to the undulating nature of the development, meaning glint and glare cannot be mitigated in this instance. The number of years for vegetation to reach full maturity and negate glint and glare would potentially not be until nearer to decommissioning.

3

The glint and glare impacts on residential dwellings identified in the report are significant especially for communities in Grendon, Easton Maudit and Mears Ashby.

Proposed mitigation measures and the potential for glint and glare to affect the quality of life for residents are inadequate.

4

There has been insufficient engagement with aviation fields such as Sywell Aerodrome, which are significant deficiencies in the consultation process.

#### Transport and access

1

The significant increase in traffic on Highfield Road has been identified as requiring further assessment. This is unacceptable. There are significant concerns about road safety, congestion, and the suitability of this road for increased HGV movements.

2

The proposed CTMP and other mitigation measures do not appear to be sufficient to address the full extent of traffic impacts and require more detailed and enforceable measures to manage construction traffic and minimize disruption and degradation to ancient properties adjacent to the roads which are inadequate for HGV traffic and wide loads.

3

Increased HGV traffic in and around Grendon during the construction phase of the Green Hill Solar Farm poses significant risk to children (routes pass the primary school and playing fields on narrow roads), ancient listed and conservation properties and areas.

There has been no consideration of the high sensitivity of passing the school along Main Road Grendon which is a primary walking route for the majority of the school children with blind bends/junctions and exits. This road must constitute a high degree of danger sensitivities and should have been assessed.

Table 13.9 then states an expected 190 workers in 160 cars on SINGLE journeys are to be expected every day for 22 months on inadequate, dangerous and congested roads.

Access to/from, in/around Grendon is highly sensitive and must be discounted as an access or transfer point.

4

Highway links with high sensitivity are listed as Easton Way to Easton Maudit but there is no further reference made as to any planned mitigation.

Table 13.9 illustrates the anticipated number of workers and vehicles per day with Easton Maudit, a village with 34 dwellings, seeing an increase of 190 workers, 130 vehicles per day, one way. This has an unacceptable impact on the location.

The figures are incorrect. Table 13.10 predicts an increase in traffic through Easton Maudit of 11.35% Annual Average Daily Traffic, 5.68% of which are HGVs. However, the IGP statistics of 653 2-way journeys between Grendon and Easton Maudit (Appendix 13.1 table 2) calculated with the IGP forecast of worker journeys of 130/day there is an uplift of 20% and not the reported 11.35%. An accurate decision must not be made from erroneous statistics and figures which are misleading.

5

The report highlights the potential for increased traffic on local roads which have already been identified as inadequate, e.g. Station Road and Earls Barton Marina bridge. This is a crucial point of access and its

accessibility and capacity to handle increased HGV traffic is a significant concern because they will see a substantial number of HGVs during the construction phase, which will lead to congestion, structural stress on the bridge and be a major impact on commuter traffic. This is an inadequate access point and MUST be discounted.

Additionally, the weight load of the Station Road bridge is 7.5T (except for loading). This means that the proposed construction traffic must not utilise this route.

Additionally, there is no evidence that the quarry company has been consulted but their lorries will be slowed due to the proposed increase in HGV and congestion.

Table 13.5 evidences baseline traffic flows for highway links associated with access to sites but does not include the traffic count over the bridge. Accurate statistical reporting is key to correctly identify the level of road sensitivity because of the requirement to cross at this bridge. The current statistics identify this road as medium sensitivity due to access from the A45 along Whiston Road but does not include the exit/access points of the sports ground, Marina and numerous pedestrians and cyclists using the bridge. The classification of this is incorrect and is likely to be highly sensitive providing another piece of evidence to state that this must not be included as an access route.

6

This bridge regularly floods, preventing access.

Any alternative route would require HGV traffic being routed through Grendon which is unacceptable due to the risk to life and the impact on the primary school and its children. For example, Main Road Grendon is reduced to a single lane during weekdays because there is little off street parking; residents park on the road, notably at the school site and beyond. HGV thoroughfare will be impossible and a risk to life as a result.

There is no assessment of or proposed mitigations in the reports.

7

The BESS access point will require HGV's to drive along Station Road which has significant and major bends of 90 degrees. It is a major accident hotspot and increase HGV travel will cause a significant increased risk of traffic accidents

8

Although the CTMP includes strategies such as scheduling deliveries to avoid peak traffic times, using designated routes to reduce the impact on local roads, and ensuring that vehicles are properly maintained to prevent breakdowns, it does not cover the ability of the bridge to withstand the weight after repeated erosion from flooding, nor from the impact of flooding on the roads or when the bridge is closed from flooding.

9

The use of traffic marshals to manage vehicle movements will significantly impact on exiting from the village, further impeding the movement of villagers who need to travel to work or school, further impacting on the lives of residents

10

Cumulative impact of more than one BESS and sub-station has not been taken into account.

11

The report's study area includes a 1km buffer for residential dwellings, but omits the numerous residential buildings that are within this buffer.

12

There are significant and major risks associated with the proximity to Major Accident Hazard Sites (Sywell) and three major accident hazard pipelines which require accurate risk assessments and robust mitigation measures to ensure safety.

13

The proposed Battery Fire Safety Management Plan is insufficient to address the full extent of fire risks and does not take into account the cumulative effect of flooding. A BESS of this volume has never been delivered or managed in the UK and the proposed measures are unacceptable as reported.

14

Significant increased impacts on road safety from increased HGV traffic and glint and glare from solar panels has not been considered. More detailed assessment of road safety impacts and robust mitigation measures to manage construction traffic are necessary.

## Hydrology, draining and flood risk

1

The flood risk assessment does not adequately mitigate for extreme weather events or future climate change impacts, especially in relation to flooding around the BESS, where fields adjacent to it already flood without the impending deterioration in the climate.

2

Data is not up to date and the 2025 Section 19 report must be considered before this plan goes any further and the Environment Agency must be consulted with specific regard to the recent and extreme flooding (4 emergency evacuations on the upper Nene resulting in flooding and road closures in and around Grendon, Easton Maudit and Earls Barton).

3

The data and reports by Greenhill have been noted to be based on generalised national modelling and not specific to the local area.

4

The reports show an absence of detailed local flood data.

The reports are stated to be estimates only and cannot be relied upon to provide a specific impact assessment on the flooding risks around Grendon. 2024 saw Grendon flood to a height of greater than 1m in depth within 1 hour.

5

The proposed sites are inappropriate, with substantial and majorly significant risks.

6

The flood risk assessment only takes into consideration the flood risk on-site and not the wider impact of flooding within the surrounding neighbourhoods

7

The assessment has not taken into account any increase in speed or volume of water runoff from concrete footings, solar panels, compacted ground and the increased risk of extensive flooding as a result.

8

Surface Water Management. The reported SuDS and other surface water management strategies are inadequate because the simulations of the amount of water are based on out of date information and do not compensate for increasingly wet weather and flooding, increased runoff from PVs, especially during heavy rainfall events.

9

The pollution risks from construction activities are significant, particularly silt-laden runoff and chemical spills. The proposed pollution control measures and emergency response plans are inadequate.

10

The consultation process has not adequately addressed local concerns about flood risk and water quality. There has been no engagement with residents impacted by local floods in Grendon and the surrounding villages to discuss mitigations to reduce further potential impacts as a result of the proposed solar farm. There has been no stakeholder engagement with regards to the flooding.

11

Cumulative flooding means that the plans must not go further without a full and comprehensive re-evaluation of flood risk and drainage as a necessary requirement.

12

There are incomplete assessments for Methodology and Baseline Conditions, including air photo and LiDAR assessment, walkover surveys, and evaluation trenching, which are reported as ongoing. Current findings are preliminary and therefore incomplete. This is insufficient for informed decision-making. The plans must not go further until assessments are fully complete.

13

The report identifies numerous non-designated archaeological features and acknowledges the potential for previously unrecorded remains. This area has notable archaeological areas of significance with settlements since the iron age, as well as Roman and British settlements noted in the Domesday book. Comprehensive surveys must be completed before the plans are allowed to go any further.

## **7. Do you have any comments based on the key elements of the indicative masterplans?**

### **Cumulative clustering**

The proposal is based here due to the 20km radius to Grendon Substation requiring this proximity to use the current substation as a transmission point. Grendon substation (est circa 1970s) has become a 'hub' for solar farms/other energies despite its inappropriate location. Any further building of a much larger BESS and substation exponentially increases local fire AND flood risk in an area of international environmental significance, which is also protected by European Law (SPA site) AND the area is a major floodplain area.

The cumulative visual impact with other developments, such as the Grendon Lakes BESS and other solar projects, would be significant. This cumulative impact and the compounded negative effects on the landscape and visual amenity have not been sufficiently taken into account in the reports.

### **Unacceptable size of pv sites, BESS and cabling**

The proposals span approximately 1,200 hectares split across multiple locations and either side of a MAJOR waterway. The sites cover approximately 5 square miles of prime agricultural land with NO MAJOR or adequate ROAD ACCESS. The cumulative effect of the entire proposed development includes an additional approximate 14 square miles of cabling all of which are proposed to be accessed by small, low quality country roads. The construction, maintenance and decommissioning (approximately a tenth of the entire lifespan of the project) will cause major disruption to traffic, residents and school children. The road surfaces are already inadequate for current HGV traffic and the villages have HGV traffic prohibitions.

The cable trenches are planned to be in the range of 1m to 7m wide with the likely working area for the cable corridor is anticipated to be 50m. The average B road is between 3.3-7.3m wide. These plans will destroy valuable and high yielding farmland, ancient hedgerow, woodland, trees and significant habitats for bats and at risk ground nesting birds. The road is a key access point to/from Grendon/Easton Maudit/Bozeat. The reports omit to detail road closure schedules, traffic management and road surface/foundation regeneration.

### **Unsound Site Selection**

The report states that the site selection process considered various alternatives within a 20km radius of the Grendon Substation with lower agricultural land classifications (Grades 4 and 5) prioritized. BUT the land chosen is split over two sides of a major waterway (River Nene) and is 100% prime agricultural land (66% of which is graded at 1, 2 and 3a). The BESS is to be located upon a major floodplain with seriously inadequate transport links and adjacent to SPA/RAMSAR/SSI wetlands/floodplains and nature reserves. The plans should have been disposed of IMMEDIATELY at this point. Flooding around this BESS will lead to heavy metals and pollutants entering the waterways polluting and potentially destroying the ecosystem for internationally significant wetlands and the inhabiting birds, mammals and insects. It will reduce biodiversity exponentially. This goes against the requirement for an NSIP to provide an increase in biodiversity net gain (BNG).

Current locations are adjacent to or 2.8km AND closer to heritage sites, ancient woodland, wildlife meadows and grasslands, water wildlife zones, conservation zones, sites of specific scientific and environmental importance (SSSI), border waterways and lakes of significant ecological importance, Special Protection Areas (SPA) and Ramsar RAMSAR (a wetland site designated to be of INTERNATIONAL importance) sites AND are in areas of high flooding.

Current flood risk identifications are out of date for both fluvial and surface water. Any flood risks historically identified will increase with the high level of additional concrete footings, PV runoffs, soil degradation and compaction for both solar pv's, battery storage systems and substations. The proposal MUST refer to the new section 19 report due to be published early 2025 in order to ensure that there is no risk to life to residents from increased flooding in the surrounding villages.

These sites should have been immediately discounted by virtue of their proximity to SPA, RAMSAR and SSSI.

### **Flooding**

Appendix 10.1 concludes site F (Easton Maudit) as having a negligible to low risk of flooding. This is incorrect as flood events over the past 2 decades have not been considered.

Within the same report, Fig 6 illustrates that all or most of sites F 3,6,7,8,9,18 are sited in flood zone 3 (the highest flood risk grading). In total 17 sites are impacted by flood zone 3 effects.

Whilst there are some mitigation measures reported these are designed to protect the PV units, BESS equipment and station sites. The measures to protect lives, households and environmentally significant wetlands and habitats from toxic pollutants escaping as a result of flooding are substantially inadequate.

Whilst the report states that critical infrastructure (energy storage compounds, substations and conversion units) will be located in low probability areas of flooding these proposed sites are all on floodplain and adjacent to critically important wetlands and waterways.

Section 4.0 of Vol 3, appendix 10.1 4.1.2, also states that if the site is inappropriately managed, there may be an increase in surface water flow and in 4.1.3 it is stated that an unmanaged drainage network would lead to an increase in flooding off-site. As there is no legislation on managing runoff from solar panels, the reports do not stipulate clear management of the sites to mitigate lifelong flood risk and a significant amount of the sites are on floodplain; the project should be deemed as high risk and not be granted permission to continue.

### **Inadequate road and transport links**

The master plan shows 5 potential site access points on the Easton Road between Grendon and Easton Maudit.

The suggested routes are inadequate and or low quality for current traffic levels and will not sustain the proposed additional HGV, LGV and car traffic (195 workers, 130 vehicles). This area should be deemed unsuitable for the project to go ahead.

### **PROW**

Fig 13.9 PROW map shows severe impacts on large numbers of sensitive receptor walkers.

### **Noise and vibration impacts**

Vol 1\_14 and Vol 2\_14 figures.

The proximity and geographical location of the BESS to Grendon must be considered in greater detail in relation to noise sensitive receptors and vibrations throughout construction, operation, maintenance and decommissioning.

The proposed sensitive receptors BESS 003/004/005 are all 500/550m from the BESS site.

There is no data provided on the level of noise and vibration expected during the construction phase.

14.4.2 of the non technical summary states 'due to the variation in construction works.....it is anticipated that any periods of high noise levels would be of a limited short term duration (less than one month)'. This does not coincide with the schedule of 12 months for the timescale of construction works of the BESS site. The information must therefore be incorrect and misleading and should not be considered in decision making.

14.8.22 States the BESS units should generate a noise level of 87dB at 1m distance due to the inverters contained within.

There is no report confirming the planned number of inverters. Without this information it is impossible to ascertain the cumulative noise effect, combined with hillside topography and prevailing winds, causing the noise to travel further.

14.8.28 makes no mention of topography.

Vol 1 14.8.31 states that the 'anticipated noise levels from the scheme are predicted to be below the existing background levels during the day and +4 db during the night'. The installation of this additional technology cannot reduce current noise levels where there is no machinery.

We dispute that the noise modelling is correct. The figures, data and projections currently provided must be rejected.

### **Landscape character and visual amenity**

The report indicates significant adverse effects on the local landscape character, particularly within the 1km study area.

The BESS and substation will be in full view from walks to Castle Ashby from Grendon and no level of vegetation or screening will counteract this. The rural landscape will be industrialized and should not go ahead in the proposed location.

The solar farm, substation and BESS will be positioned on land visible from Grendon. Travelling out of Grendon towards Easton Maudit by car, on foot, bicycle, or horseback will take residents, visitors and tourists past large arrays of solar panels. It will severely impact mental and physical health and the hospitality, tourist and equine industry locally.

Easton Maudit will be surrounded and visible on three sides by the solar farm in a continuous arc of 290 degrees, spreading up to Bozeat and towards Strixton. All three villages will have significant visual and environmental impacts from the solar farm which is hugely detrimental to the historic nature of these villages

- Grendon is mentioned in the Domesday Book of 1086 and has significant cultural assets and houses, which will be spoiled by the proximity of these solar panels.
- Easton Maudit has a historic grade I listed church
- If it is not acceptable to have this solar farm close to the Castle Ashby House, then it will be unacceptable to the local cultural assets of these other areas.

Long-Term Visual Impact: Even with mitigation, significant visual impacts will remain significant at Year 15. The long-term adverse effects despite proposed mitigation will mean adverse effects for decades and decades to come.



## **Section 6: Cable route corridor**

### **8. Do you have any comments based on the proposed routing of the cable route corridor?**

#### **Potential destruction of major waterways/wetlands**

The proposals span approximately 1,200 hectares split across multiple locations and either side of a MAJOR waterway. As a result the proposed cable route corridor includes a large section planned to be cabled under the river Nene. This is an unacceptable risk to an important waterway and the proximity and risk to internationally significant wetlands and SPA is untenable. This proposed route should be disregarded.

#### **Destruction of ancient woodland**

Cabling is planned through or with insufficient buffering to ancient woodland and hedgerow. The regulatory BNG targets will be unable to be met. Additionally, it would take centuries for the environment to recover from the proposed destruction and should be disregarded.

#### **Destruction of prime agricultural land**

The sites cover approximately 5 square miles of prime agricultural land with NO MAJOR or adequate ROAD ACCESS. The cumulative effect of the entire proposed development includes an additional approximate 14 square miles of cabling all of which are proposed to be accessed by small, low quality country roads.

#### **Inadequate/Poor transport links and roads**

The construction, maintenance and decommissioning (approximately a tenth of the entire lifespan of the project) will cause major disruption to traffic, residents and school children. The road surfaces are already inadequate for current HGV traffic and the villages have HGV traffic prohibitions.

#### **Negative Impact on habitat and at risk wildlife**

The cable trenches are planned to be in the range of 1m to 7m wide with the likely working area for the cable corridor is anticipated to be 50m. The average B road is between 3.3-7.3m wide. These plans will destroy valuable and high yielding farmland, ancient hedgerow, woodland, trees and significant habitats for bats and at risk ground nesting birds. The road is a key access point to/from Grendon/Easton Maudit/Bozeat. The reports omit to detail road closure schedules, traffic management and road surface/foundation regeneration.

#### **Increased risk of accidents and major hazards**

The reports note the proximity to three Major Accident Hazard Sites and Pipelines (Sywell) but show inadequate risk assessments and mitigation measures to ensure public safety.

2024 saw 4 road closures as a result of severe flooding and the cabling is planned across a large section of this flood area. The result of compacted ground will increase local flood impacts and extend the construction time exponentially. The proposed area is inappropriate and must be disregarded as suitable for cabling.

The proposed corridor will impact on road safety due to increased HGV and construction traffic on already inadequate, poor and congested roads..

#### **Loss of visual amenity, PROW and landscape access**

The areas listed include well used and popular PROWS which will be unable to be accessed. It is a legal right for members of the public to access these PROW at all times.

The cabling is unacceptably close to nature reserves. The destruction, dust, sediment, vibration and noise will severely impact on the resident wildlife and is likely to damage the internationally significant wetlands and nature reserves.

Due to the topography of the landscape the cabling corridor will be visible throughout the construction phase by several main communities and villages.

The cabling corridor is excessively impactful and unsuitable. It should be disregarded.

## Section 7: Construction, operation and decommissioning

### 9. Please provide comments on our assessments relating to the potential effects during the construction, operation, maintenance and decommissioning of Green Hill Solar Farm.

#### Unacceptable:

- Use of BMV agricultural land required for food security.
- Impact on internationally and scientifically significant wetlands.
- Travel impact to all residents and children commuting for the duration of the 2.5 years construction schedule as a result of inadequate and inappropriate transport links and road quality.
- Impact on the mental health and wellbeing of all residents as a result of the proposed work schedule and noise pollution for construction (6 days a week, including Saturday mornings, and throughout commute times morning and night).
- Impact on local heritage sites, travel and tourism events and industry, equine industry.
- Impact on well used and internationally significant PROWs; access will be limited during construction and decommissioning and long term use will be negatively impacted leading to a reduction in international tourism and a loss of the public's legal right of access to amenities.
- Level of visual impact for residents, visitors and tourists.
- And potentially dangerous travel impacts as a result of proximity to major hazards and pipelines.
- Fire risk with inadequate and untested mitigation measures .
- Size of the scheme; the scale of the BESS has never been delivered in the UK before and the:
- Site selection chosen for the BESS is on top of floodplain and adjacent to internationally and scientifically important and significant wetlands. This is untenable and the plans should be rejected immediately.
- Length of the scheme is equivalent to 4-5 generations. The scheme should not be classed as temporary given that a high percentage of residents affected will be dead before decommissioning.
- Level of increased risk from flooding as a result of the installation of concrete, plastics and glass on BMV agricultural land and soil degradation from runoff.
- Potential for noise and light pollution. The data and statistics provided in the reports is in places incorrect and misleading and should be disregarded.
- Impact on landscape character - the rural countryside will be industrialised leading to the destruction of the rural character.
- Level of glint and glare leading to significant negative impacts and risk to life for all affected communities, aviation/pilots and horses/riders.
- Increase in theft and crime related to solar panel theft and opportunism.
- Cumulative effects of noise, light pollution, BESS and other solar developments.
- Inadequate guarantees:
  - that the energy produced will offer the UK energy security
  - and systems to ensure the sites are maintained and monitored effectively to mitigate flood and fire risk. Limited evidence to support the assessments of fire risk and no contingency for cumulative fire and flood risk. Historical evidence confirming that BESS fires are dangerous and toxic to wildlife and humans
  - Local residents and wildlife will be safe from fumes from fires and will not need to be evacuated. Currently no fire action plan
  - For improved biodiversity
  - To limit impact on air quality
  - On keeping PROWs open, accessible and enjoyable for all
  - On appropriate and continued management of the development by IGP

**10. How would you like to be kept up to date during the construction, operation and decommission of Green Hill Solar Farm?**

**Please specify:**

Regular community forum AND

Community liaison officer

## **Section 8: Preliminary Environmental Information Report (PEIR)**

### **11. Transport: Please provide your comments on our proposed access routes to the sites.**

#### **The road and transport routes and links are inadequate.**

The roads to the BESS/Grendon/Easton Maudit and Bozeat are of poor quality, small and have limited accessibility with severe restrictions for HGVs.

They are already congested at peak times and the routes close several times annually due to severe flooding.

The primary access route of the single carriageway bridge on Station Road has substantial access and width restrictions in addition to dangerous bends that see a high volume of accidents. The surface is currently being assessed on its strength and soundness. The roads are inadequate for current levels of traffic and will not sustain the reported volume of additional traffic (HGV/abnormal roads).

The reports do not address concerns or provide suitable mitigations regarding congestion and closures, the increased commute time and inevitable, lengthy diversions that will be required for school and work commuters especially given the cumulative impact of severe flooding across the routes around/in/out of Grendon through to Earls Barton and on to Easton Maudit.

The transport links as proposed are inadequate and unsustainable for the size and length of the project. The project should not be given approval as a result.

#### **Proposed planned upgrades omitted from reports**

The reports state that upgrades are planned to the roads to improve visibility and accommodate construction and maintenance traffic. There are no details as to which roads, where and what improvements there will be. Improvements to Station Road (Earls Barton Marina) bridge will be impossible.

This route requires detailed assessment and accurate classification to highly sensitive with clearly reported risks to cyclists, walkers, drivers and local residents identified.

Before the application can go further the developers MUST reclassify, assess and plan the required mitigations and clearly report on which roads/routes are planned to be improved and how.

The current primary access route to the proposed BESS and further on into Grendon and on to Easton Maudit is significantly unsuitable and should be discounted and removed from the proposals.

The reports also state that specific access points and routes for Abnormal Indivisible Loads will be determined through further assessments and consultations with relevant highway authorities. The proposals cannot and must not go further without these assessments and consultations being completed accurately to truthfully reflect the volume and impact of traffic, most specifically on the primary routes from the A45 on towards Grendon/Easton Maudit and Bozeat. The current assessment is misleading, inaccurate and inadequate.

#### **High percentage of unsuitable road and transport links.**

The maps identifying the transport links and routes show that at least 50% of the roads to the site locations are inadequate country roads.

#### **Heritage, listed and conservation housing**

The proximity of up to 40% of the proposed access and transport roads are within an unacceptable distance to heritage houses, conservation and listed buildings because the HGV and abnormal load traffic will lead to significant structural degradation and damage given that it will continue over a two year period.

Additionally most of the small villages affected have no or limited HGV access. The villages have schools and the proposed routes will increase the risk to life of children and families walking to school and crossing the proposed routes. No major roads to support additional traffic which will significantly impact by increasing traffic leading to problems accessing schools and workplaces for residents within the affected villages.

#### **The reports mention identifying road and traffic constraints that may arise.**

The project must not go ahead until these are qualified and assessed. No decisions can be made without accurate data and information.

## **Highfield Road**

The significant increase in traffic on Highfield Road has been identified as requiring further assessment. This is unacceptable. There are significant concerns about road safety, congestion, and the suitability of this road for increased HGV movements.

## **CTMP**

The proposed CTMP and other mitigation measures do not appear to be sufficient to address the full extent of traffic impacts and require more detailed and enforceable measures to manage construction traffic and minimize disruption and degradation to ancient properties adjacent to the inadequate for HGV traffic and wide loads.

## **Significant risk to children and omission of sensitivity classifications of roads adjacent to schools**

Increased HGV traffic in and around Grendon during the construction phase of the Green Hill Solar Farm poses significant risk to children (routes pass the primary school and playing fields on narrow roads), ancient listed and conservation properties and areas.

There has been no consideration of the high sensitivity of passing the school along Main Road Grendon which is a primary walking route for the majority of the school children with blind bends/junctions and exits. This road must constitute a high degree of danger sensitivities and should have been assessed.

Table 13.9 then states an expected 190 workers in 160 cars on SINGLE journeys are to be expected every day for 22 months on inadequate, dangerous and congested roads.

Access to/from, in/around Grendon is highly sensitive and must be discounted as an access or transfer point.

## **Omission of planned mitigations for high sensitivity road links**

Highway links with high sensitivity are listed as Easton Way to Easton Maudit but there is no further reference made as to any planned mitigation.

Table 13.9 illustrates the anticipated number of workers and vehicles per day with Easton Maudit, a village with 34 dwellings, seeing an increase of 190 workers, 130 vehicles per day, one way. This has an unacceptable impact on the location.

The figures are incorrect. Table 13.10 predicts an increase in traffic through Easton Maudit of 11.35% Annual Average Daily Traffic, 5.68% of which are HGVs. However, the IGP statistics of 653 2-way journeys between Grendon and Easton Maudit (Appendix 13.1 table 2) calculated with the IGP forecast of worker journeys of 130/day there is an uplift of 20% and not the reported 11.35%. An accurate decision must not be made from erroneous statistics and figures which are misleading.

## **Unacceptable increase of traffic on roads identified as inadequate**

The report highlights the potential for increased traffic on local roads which have already been identified as inadequate, e.g. Station Road and Earls Barton Marina bridge. This is a crucial point of access and its accessibility and capacity to handle increased HGV traffic is a significant concern because they will see a substantial number of HGVs during the construction phase, which will lead to congestion, structural stress on the bridge and be a major impact on commuter traffic. This is an inadequate access point and MUST be discounted.

Additionally the weight load of the Station Road bridge is 7.5T (except for loading). This means that the proposed construction traffic MUST NOT utilise this route.

Additionally there is no evidence that the quarry company has been consulted but their lorries will be slowed and their business impacted as a result due to the suggested increase in HGV and congestion.

Table 13.5 evidence baseline traffic flows for highway links associated with access to sites but does not include the traffic count over the bridge. Accurate statistical reporting is key to correctly identify the level of road sensitivity because of the requirement to cross at this bridge. The current statistics identify this road as medium sensitive due to access from the A45 along Whiston Road but does not include the exit/access points of the sports ground, Marina and numerous pedestrians and cyclists using the bridge. The classification of this is incorrect and is likely to be highly sensitive providing another piece of evidence to state that this must not be included as an access route.

## **Severe Flooding Station Road and Bridge**

This bridge regularly floods, preventing access. Any alternative route would require HGV traffic being routed through Grendon which is unacceptable due to the risk to life and the impact on the primary school and its children. There is no assessment of, or proposed mitigations for, reported.

## **Dangerous bends for HGV, inaccessible for abnormal loads**

The BESS access point will require HGV's to drive along Station Road which has significant and major bends of 90o. It is a major accident hotspot and increased HGV travel will cause a significant increased risk of traffic accidents. Any of the

proposed abnormal loads will be unable to traverse the bridge which will mean that they will need to drive through Grendon. Grendon has a HGV restriction and the roads are also inaccessible for abnormal roads. The proposed transport links to/from the proposed BESS site must be excluded and removed from the application.

### **Repeated bridge erosion and instability from severe flooding**

Although the CTMP includes strategies such as scheduling deliveries to avoid peak traffic times, using designated routes to reduce the impact on local roads, and ensuring that vehicles are properly maintained to prevent breakdowns, it does not cover the ability of the bridge to withstand the weight after repeated erosion from flooding, nor from the impact of flooding on the roads or when the bridge is closed from flooding.

### **Impacts on commuters and school children**

The use of traffic marshals to manage vehicle movements will significantly impact on exiting from the Grendon, further impeding the movement of villagers who need to travel to work or school, and further impacting on the lives of residents. The travel impact to all residents and children commuting for the duration of the 2.5 years construction schedule as a result of inadequate and inappropriate transport links and road quality is unacceptable. The project should not be approved because the financial and educational impact on commuters and families is unacceptable.

### **Cumulative impact BESS**

Cumulative impact of more than one BESS and sub-station has not been taken into account and not reported on. The proposals must not continue until detailed and full assessment of the risks, dangers and impacts to residents, communities, wildlife and internationally significant habitats have been clearly and accurately identified and fully mitigated.

### **Incorrect study reporting**

The report's study area includes a 1km buffer for residential dwellings, but omits the numerous residential buildings that are within this buffer.

### **Major Hazard Site and Pipeline risks**

There are significant and major risks associated with the proximity to Major Accident Hazard Sites (Sywell) and three major accident hazard pipelines which require accurate risk assessments and robust mitigation measures to ensure safety.

### **Insufficient and unproved Battery Fire Safety Plan**

The proposed Battery Fire Safety Management Plan is insufficient to address the full extent of fire risks and does not take into account the cumulative effect of flooding. A BESS of this volume has never been constructed or operated in the UK and the proposed mitigation measures are unacceptable as reported.

### **Unacceptable impacts to road safety**

Significant increased impacts on road safety from increased HGV traffic and glint and glare from solar panels has not been considered. More detailed assessment of road safety impacts and robust mitigation measures to manage construction traffic are necessary.

### **Inadequate/Poor transport links and roads**

The construction, maintenance and decommissioning (approximately one tenth the lifespan of the project) will cause major disruption to traffic, residents and school children. The road surfaces are already inadequate for current HGV traffic and the villages have HGV traffic prohibitions.

### **Road management and closure omissions**

The reports omit to detail road closure schedules, traffic management and road surface/foundation regeneration.

### **Increased risk of accidents and major hazards**

The reports note the proximity to three Major Accident Hazard Sites and Pipelines (Sywell) but show inadequate risk assessments and mitigation measures to ensure public safety.

2024 saw 4 road closures as a result of severe flooding and the cabling is planned across a large section of this flood area. The result of compacted ground will increase local flood impacts and extend the construction time exponentially. The proposed area is inappropriate and must be disregarded as suitable for cabling.

The proposed corridor will impact on road safety due to increased HGV and construction traffic on already inadequate, poor and congested roads.

**12. Transport: Are there any sensitivities along the local road network that we should be aware of? Please provide your comments using the space below.**

There is severe flooding on a high percentage of the access roads to the BESS and on to the Easton Maudit, Bozeat and Lavendon PV sites.

The flood data is incorrect and out of date. This must be remedied prior to the proposals moving forward.

The routes MUST be reassessed and detailed reports and full mitigations presented after the Section 19 report on flood risk is released in 2025. The project MUST NOT continue until this has been completed and the mitigations agreed as acceptable.

The roads currently identified as the main transport access routes to the BESS and Easton Maudit, Bozeat and Lavendon PV sites have inadequate and potentially structurally unsound road surfaces and bridge strengths.

These routes are inaccessible and/or dangerous to HGV or abnormal loads and the villages have HGV restrictions.

The transport link roads south of the River Nene are minor, insufficiently wide or straight enough to handle HGV's and abnormal loads and the Station Road bridge requires appropriate and accurate assessment for sensitivities.

The routes suggested for the development south of the River Nene must be disregarded as a direct result of inadequate road transport links, proximity to heritage, conservation and listed properties and the risk to life of school children and families walking to school who cross and use these roads.



**13. Visual impact: Please share any comments on our assessment of the potential effects of the solar farm on the landscape and views, as well as on the measures we propose to mitigate these impacts.**

**Glint and Glare**

Increased likelihood of:

- loss of enjoyment of countryside due to glint/glare from the volume of PV's and their proposed height.
- Horse and rider injury from glint and glare.
- The position of this solar farm has a significant impact on aviation safety, particularly at Sywell Aerodrome, William Pitt Airfield, Easton Maudit Airfield, Pitsford Airfield, and Hold Farm Airfield. It is a necessary requirement for more detailed assessments and robust mitigation measures to ensure aviation safety is not compromised.
- The proposed mitigation measures, such as vegetation screening and opaque fencing, will not be sufficient to address the full extent of glint and glare impacts, as many residential properties, sites of historic interest, public rights of way will be easily able to see the solar farm panels, due to the undulating nature of the development, meaning glint and glare cannot be mitigated in this instance. The number of years for vegetation to reach full maturity and negate glint and glare would potentially not be until nearer to decommissioning.
- The glint and glare impacts on residential dwellings identified in the report are significant especially for communities in Grendon, Easton Maudit and Mears Ashby.
- Proposed mitigation measures and the potential for glint and glare to affect the quality of life for residents are inadequate.
- There has been insufficient engagement with aviation fields such as Sywell Aerodrome, which are significant deficiencies in the consultation process.

**Night lighting and Security**

- Security lighting and cameras will reduce the quality of life of local residents and reduce levels of privacy.
- Reduction in enjoyment of the countryside because of the number of security cameras and high security fencing.
- High security fencing required for security will limit views. Any public footpaths will require a minimum width to be agreed with statutory bodies before the application proceeds further so as to limit negative impacts on the enjoyment of countryside and health walks for residents, tourists and the public.
- Loss of enjoyment at night due to light pollution.
- Loss of tourism and major impact on hospitality businesses, specifically nighttime events.

The cumulative visual impact with other developments, such as the Grendon Lakes BESS and many other planned solar projects would be significant. This cumulative impact has not been taken into account sufficiently, it has not assessed the compounded negative effects on the landscape and visual amenity.

The report identifies several residential properties that will experience significant visual impacts during construction and operation (e.g. New Lodge Farm, Tithe Farm, and properties along Highfield Road).

We strongly object based on the significant adverse effects on residents' visual amenity and the potential for reduced property values. If the impact is so significant that the panels cannot be close to cultural heritage assets like Castle Ashby House then that impact should be considered as equally or more significant for those people living within metres of the pv sites.

The report proposes embedded mitigation measures such as removing panels from sensitive areas and using non-intrusive concrete feet. The effectiveness of these measures is contingent on the completion of ongoing assessments. However the reliability of these measures with incomplete data is significantly limited. This submission is premature as not all assessments have been completed or taken into account meaning mitigation plans are insufficient or potentially incorrect.

The report indicates significant adverse effects on the local landscape character, particularly within the 1km study area. The BESS and substation will be in full view from walks to Castle Ashby from Grendon and no level of vegetation or screening will counteract this. The rural landscape will be industrialized and should not go ahead in the proposed location.

The solar farm, substation and BESS will be positioned on land visible from Grendon. Travelling out of Grendon towards Easton Maudit by car, on foot, bicycle, or horseback will take residents, visitors and tourists past large arrays of solar panels. It will severely impact mental and physical health and the hospitality, tourist and equine industry locally. Easton Maudit will be surrounded and visible on three sides by the solar farm in a continuous arc of 290 degrees, spreading up to Bozeat and towards Strixton. All three villages will have significant visual and environmental impacts from the solar farm which is hugely detrimental to the historic nature of these villages

- Grendon is mentioned in the Domesday Book of 1086 and has significant cultural assets and houses, which will be spoiled by the proximity of these solar panels.
- Easton Maudit has a historic grade I listed church
- If it is not acceptable to have this solar farm close to the Castle Ashby House, then it will be unacceptable to the local cultural assets of these other areas.

Long-Term Visual Impact: Even with mitigation, significant visual impacts will remain significant at Year 15. The long-term adverse effects despite proposed mitigation will mean adverse effects for decades and decades to come.

Due to the topography of the landscape the cabling corridor will be visible throughout the construction phase by several main communities and villages. The cabling corridor is excessively impactful and unsuitable. It should be disregarded.

## **Section 9: Community benefits**

### **14. Do you have any suggestions on what community benefits could be delivered as part of the Green Hill Solar Farm project?**

Community benefits for Grendon

We would suggest allocation of money to pay for:

- purchase of village pub
- Speeding countermeasures including traffic calming
- purchase of land for sports and recreation facilities
- Installation of adult exercise equipment
- reparation payments for loss of income to local businesses
- Relocation costs to businesses at risk of closure as a result of loss of business, eg equine related industries, tourism and hospitality industries
- reparation payments to residents to cover the reduction in house value due to loss of amenities, proximity to huge solar farm, increased local crime rates, increased household insurance costs
- Removal of nighttime security lighting to PV sites

Should this proposal go ahead and the development subsequently sold off to the various operators and management groups, then written guarantees must be provided to ensure any community benefit would be honoured, not just in the immediate term but for the life of the scheme.

## Section 10: Other comments

### 15. Do you have any other comments on the information presented on Green Hill Solar Farm?

#### Construction period - 2.5 years

- Impact on mental health - noise leading to depression and mental health deterioration compounded by loss of amenities and access to rural life and countryside as a result of the reduced and impacted visual amenity and impact on PROWS
- Dust and pollution - increased likelihood of respiratory disease as this cannot be counteracted when living in the environment. Insufficient mitigations to limit air pollution and bring back air quality.
- Contravenes all the North Northamptonshire Council's air quality legislation and regulatory targets
- Increased likelihood of childhood respiratory disease. Several play areas are within 500m of the main construction and solar PV limit sites.

#### Increased crime

National statistics show:

- Increase in organised crime and theft of renewable energy components; solar farms specific targets, leading to an increase in neighbouring crimes.
- Police data shows a 48% increase in solar panel and cabling theft according to EnergyGlobal.com (July 2024).
- Police in the UK observed a 93% rise in reports of solar-related crimes from 2021 to 2022 with approximately £574,300 worth of property stolen from UK solar sites in 2023 leading to an exponential increase in household insurance costs for homes living in or near to solar farms.
- Devaluation of local properties due to loss of tourism, increase in flood and fire risk, loss of countryside value and access, increased neighbourhood crime.

#### Increased fire risk

- Clustering of BESS and sub-stations will lead to increased fire risk.
- No evidence provided of procedures to limit fire risk and mitigate fires.
- Proximity to wetlands - that water CANNOT be used to put out fires.
- Proximity to wetlands and nature reserves - level of destruction from toxicity and polluted air, smoke and other fire risk is totally unacceptable.
- Fire safety report required but not available
- Safety precautions required but not available
- Risk of destruction of the landscape, local wildlife, SSSI's, RAMSAR and SPA due to increased fire risk from BESS and substations being adjacent to said sites.

#### Volume of land required for cabling

- Total land developed and habitat destroyed is approximately 21km including the cabling corridors which are proposed to be up to 50m width x 2m depth in places.
- Cabling section runs through ancient trees, hedgerows and woodland

#### Unsound Site Selection

- BESS proposed to be situated adjacent to SSSI's, RAMSARS, SPA and natural habitat for local birds, newts and wildlife and on areas of severe flooding
- Extent of cabling increases the construction area by approximately 500%.

#### Unsound choice of renewable energy

- Statistically and environmentally rural wind farms are:
  - Significantly more productive in the UK than solar
  - Generate significantly less Co2 emissions in operation
  - Require significantly less land therefore ensure continued food production and therefore UK food security

- Require less cabling and therefore ensure environmental, wildlife and habitat security and less destruction
- More environmentally friendly in production and do not leak toxic chemicals into the land.
- Wind turbines are better suited to rural environments.

### **Lifespan, ethical sourcing and regeneration**

- 60 years, the predicted lifespan, is not temporary. It is the equivalent of up to 6 generations (10-15 years) and a large percentage of residents living in the affected areas will not live to see the decommissioning of the sites.
- The typical lifespan of a Solar PV is up to 20-30 years. The panels will require at least 2 but more likely 3 replacement units. This ongoing maintenance will mean that transport and congestion impacts will not be temporary but continue through the lifespan of the project, especially when considering the proposed upgrades in line with new technology..

### **Unrealistic Design Principles**

- The cost to meet the guideline design principles of bringing the soil back to better than current is significantly unrealistic. The impact on the land quality after 60 years of plastic, compaction, degradation and toxic pollutants is majorly significant. If the sites were brownfield then the required BNG of 10% would be achievable. The sites are 66% BMV grades 1-3a with the remaining 34% BMV 3b. This means that 100% of the land is prime agricultural land that is high yielding and promotes biodiversity in its current state. To improve the land back to better is unrealistic. The project must not go ahead as a result of the FACT that 100% of the LAND IS PRIME BMV.
- Specific allocation and written procedures and guarantees MUST be published prior to taking the application further. These will prescribe how the land will be regenerated back to best and most useful agricultural and farming land and include an appropriate level of inflation.
- This cost should be paid for by Greenhill/Island Green Power and not any subsequent buyer or energy procurement firm. This is required to be built into any contract as a restrictive covenant.

### **Ethical sourcing of PV and Batteries**

- There must be a written and prescribed guarantee on the ethical SOURCING of solar panels and batteries for both the initial construction and the end of life PV replacement as well as interim maintenance parts within all contracts for subsequent energy ownership.
- There must be a written and prescribed guarantee on the ethical DISPOSAL of solar panels and batteries for both the initial construction and for the end of life PV replacement as well as interim maintenance parts within all within contracts for subsequent energy ownership.
- These guarantees must be inflation proofed and published prior to the application proceeding further.

## **16. Do you have any comments or suggestions on the public consultation on Green Hill Solar Farm? Better and Wider Consultation and Stakeholder Engagement**

The effectiveness of public engagement efforts and the incorporation of local community feedback into the planning process has been unacceptable.

There was no meeting organised by the developers for those residents in Mears Ashby, one of the villages most affected by these plans.

A meeting has been held in Swanspool Wellingborough. The town is not significantly affected or impacted by these plans. The locations and limited number of consultation events has meant that only members of the public with access to a car could attend the meetings – adversely impacting those affected by inequalities, preventing them from attending and reducing feedback from the community. Whilst the online forums were available this still adversely affects and impacts individuals and households with financial constraints and limited access to computing facilities to enable attending online events.

50% of the in-person events were held during work hours, when residents who work would not be able to attend. Thus further reducing feedback from the local community.

Those residents who drive but do not work could easily attend their 'local' consultation meeting, leaving many unable to participate in the consultation.

### **Inadequate publication of information**

The PEIR was not hosted on the website until 1-2 weeks after the presence of local notices on some public rights of way and letters being delivered to some villages. The PEIR was not published by the advertised dates.

In order for the public to access the extensive information online required repeated checking over a period of weeks before access to the documentation was available.

The notices placed on public rights of way, were not placed on the public rights of way which are proposed to be affected.

### **Inadequate provision of notifications of consultation**

Consultation notices on PROW were not legible due to the print size, ink used and inadequate sealing of the papers.. For example, names of villages were illegible which meant their relative location to the BESS and solar PV sites on the map could not be recognised. Inadequate sealing meant that the papers deteriorated to the point that the information was unreadable after any rain.

### **Inaccessible documentation**

Free paper copies of documentation should have been made available for collection or delivery.

The cost for printed copies was unacceptably prohibitive.

Limited access to copies in libraries. Every affected village and community should have been given a printed copy for holding in a publicly accessible space.

Presentations should have been made in all of the affected villages as well as surrounding communities. All the presentations should have been held during the day and night in order to meet an acceptable level of consultation outcomes and reach an adequate number of affected residents.

### **Inaccuracies and misleading information**

The documentation has an unacceptable number of errors giving rise to information which is misleading on key elements with major negative impacts. Decisions or approvals must not be made until all the information is correct and truthful.

No accurate and just decisions can be made on the current documentation as a result of inaccuracies, inadequate modelling. The project must not go ahead until a full, clear, transparent and accurate report can be provided clearly evidencing the volume of problems associated with this development.

**17. Please let us know how you heard about the consultation by ticking one or more of the following boxes:**

**Please specify**

Other - statutory consultee

Home

Consultation leaflet and letter

**18. Did you attend our face-to-face or online consultation events?**

Face to face and online

Home

Face to face or online whichever



**19. Please rate the information included as part of this consultation in terms of how clearly it was presented and how easy it was to understand.**

The information was unacceptably inaccessible.

The volume was immense and there was no summary documentation for the sub sections.

The volumes of appendices were unclear and poorly titled leading to difficulties in interpreting the relative central documentation.

The reports were written in such a way that it was beyond the comprehension and capacity of most.

The documents should have been provided as text/word formats so they could be easily and readily searched for keywords after downloading.

## **Additional space for feedback**

### **Conclusion**

We are not in favour of the proposed development because of the unacceptable negative impacts on:

- Health risks to residents, mental, emotional and physical
- Inadequate and inaccessible road and transport links with no way to improve this without destroying rural life, habitat and species
- Detrimental economic impact on tourism, hospitality, equine industries and farmers
- Loss of amenities for residents, international and national tourists and walkers
- Loss of food security
- Loss of visual amenity
- HIGH flood risk areas - the section 19 report due to be published in early 2025 must be considered. All reference to flooding is unacceptably out of date.
- And potential destruction of local nature, wildlife and habitats of endangered species
- And potential destruction and degradation of internationally significant, environmentally important wetlands, nature reserves most specifically the SSSI's, RAMSARs and SPA sites but also ancient woodlands, hedgerows
- Untenable positioning of the BESS/substation

A better use of the proposed land for renewable energy production would be wind turbines. Zero carbon emissions whilst in use and in production, much longer lifespan and allows for continued farming both arable and pastoral; greater energy production for the vast majority of the year, especially significant on the hillsides/topography planned to be used in this proposal.

UK Energy security is important and this will only be achieved if the ownership is retained by UK companies/Government. It must not be sold off to overseas companies/investment groups which may be indirectly owned by foreign governments.

Renewable energy does have its place in energy production but to rely on it would be foolhardy, since recently and for some days, almost no energy was produced by solar or wind due to weather conditions. The UK was therefore reliant on importing energy from abroad. Alternative energy sources ARE vital e.g nuclear/heat pumps/hydrogen etc. and we cannot allocate the volumes proposed to solar without being at severe risk of lack of energy independence.