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20th August 2024

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol BS1 6PN

Dear Sir/Madam

Re: EN010170 - Green Hill Solar Farm - EIA Scoping Notification and Consultation

Your ref: EN010170-000015

As per your letter dated 25th July 2024 addressed to us as consultees, we are writing to provide information that is to be considered under the Environmental Statement relating to the proposed development above.

We note that the Applicant accepts that the project constitutes “EIA development” within the meaning of regulation 3 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (“the Regulations”), “by virtue of factors such as its nature, size and location” and that a DCO application must therefore be accompanied by an Environmental Statement (“ES”) (page 11, paras 1.2.2 - 1.2.4 of the Scoping Report)

In terms of our response we are given 2 options: either (a) ‘No comments’; or, (b) ‘inform the PI of the information you consider should be provided in the ES’.

- We respond with the second option, on the understanding that this means: any information which the applicant has requested to be ‘scoped out’ of the EIA, as well as any other relevant information not included in the scoping request.
- In responding we have taken guidance from the EIA Regulations. Planning guidance also states: *“Applicants should avoid submitting requests with multiple and varied design and layout options. However, if this cannot be avoided and options remain under consideration*

(for example a number of route corridors associated with a proposed linear development), Applicants should be aware that this may affect the ability of the Planning Inspectorate and consultation bodies to provide detailed comments. In addition, should a high level of uncertainty remain around key design elements of the Proposed Development this is likely to limit the Planning Inspectorate's ability to agree to scope out aspects/ matters to enable the refinement of the ES."

- Our focus is the site Green Hill B near the village of Holcot.

We consider that, contrary to the "Scoping Report" ("SR") which accompanies the application for a scoping opinion, the following information should be provided and addressed in the ES.

1. The SR states (page 24, para 2.2.59) that: "the ES will include a chapter setting out the alternatives considered and the main reasons for selecting the chosen option. The chapter will focus on the following aspects of option selection:

- Site selection.
 - Alternative technologies.
 - The layout of the Scheme.
 - Cable Corridor options.
 - The location of supporting infrastructure."
- (i) Having regard to paragraph 2 of Schedule 4 of the Regulations, the "description of reasonable alternatives" should include, inter alia, location, scale and size.
 - (ii) The main reasons for selecting the chosen option should also include "a comparison of the environmental effects" of the options.

(It is noted, in this regard, that the SR acknowledges (page 326, para 21.3.14) that it is not known whether the development of Sites A-F would involve development on Grade 3a agricultural land, in addition to Grade 2 land - both Grade 2 and Grade 3a land of course constituting "best and most versatile" agricultural land - because an agricultural survey to determine the sub-classification of the Grade 3 land had not been undertaken. Site selection appears therefore to have been determined contrary to Government advice in the National Policy Statement for Renewable Energy Infrastructure (EN-3) that "low and medium grade agricultural land should where possible be sought".

2. Page 16, para 2.2.14 of the SR refers to an "operational phase" of "up to 60 years".

- (i) this is longer than anticipated by the relevant NPS (40 years) which, it is understood, is the typical upper limit (EN-3, para 2.10.65) and needs to be justified and the likely significant environmental effects of the whole period, and separately the additional 20 years, should be assessed in the ES.
- (ii) by reference to page 16, para 2.2.12, 60 years clearly falls within the category "long term" ("lasting more than 5 years") (or more than 10 years for LVIA: para 7.7.3) and cannot sensibly and reasonably said to be temporary.

- (iii) the assessment should therefore be carried out on the basis that the development would, to all intents and purposes, be permanent; not only because 60 years generally represents the entire span of adulthood (or 2 generations) but also because paragraph 163 c) of the NPPF (December 2023) states that: “in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, and approve the proposal if its impacts are or can be made acceptable.”

3. The proposed “assessment scenarios” (page 17, para 2.2.16 of the SR) include “Construction 2027-2029” and “Operation Year 1 2029” (from Q3).

- No documentary evidence has been provided (e.g. a copy of any relevant, redacted agreement) to demonstrate that a connection to the grid etc would be achieved by 2029.
- Unless and until this documentary evidence be provided, alternative, later “assessment scenario” years should be included in the ES.

4. Page 17, para 2.2.16 of the SR also refers to a decommissioning year of 2089 but there is no reference to any financial bond being proposed to be put in place to ensure that the cost of decommissioning would be met.

- In the absence of a bond, an assessment of likely significant environmental effects only up to 2089 cannot be assumed to suffice.

5. Paragraph 2.2.44 Page 21 This paragraph discusses ‘apportionment’ of mitigation. The costs of the Applicant’s development are unlikely to be borne by existing developments where EIA has already been completed, and should not be borne by the public purse. The Planning Inspectorate should consider how they ensure the rigour that the Applicant puts into developing mitigation proposals (without avoiding costs) and how the report is made realistic in this respect.

6. The titles to the appendices to the SR, as given online, are unhelpful, making it very difficult to find relevant information, e.g. Figures to Chapter 12 – were only eventually found in Part 8 of 8 of the Appendices. Similarly, e.g. the Appendix to Chapter 9 is to be found in Part 2 of 8 of the Appendices. The signposting is unacceptably poor and must be considerably improved in the ES.

(The SR documents have also not been uploaded (presumably by PINS staff) onto the website in sequential order. This does not assist members of the public.)

7. The SR states that there has been a meeting with Gen Kitchen MP for Wellingborough (page 13, para 1.5.1) but makes no reference to meetings with the MP for Daventry constituency (which includes directly affected land within West Northants Council’s area) – formerly the Right Hon. Chris Heaton-Harris, now Stuart Andrew MP; nor to the MP for that part of the Milton Keynes’ constituency in which part of the proposed project would fall (page 10, para 1.1.9). We believe that the MP’s for every impacted constituency should be consulted.

These paragraphs discuss cumulative impacts. There are two aspects of this analysis necessary:

- The cumulative aspects of the Proposal itself. – for instance, considering the cumulative impact of each facet of the analysis, and also the impact once all facets are considered as a whole.
- The impacts as described in the paragraphs when taken with other approved developments, again against each facet.

Paragraph 23.1.3 on page 343 refers to this analysis in part. However subsequent paragraphs imply that cumulative impact will only be assessed where a facet has a significant impact at a micro-level. Of course, whilst taken alone a facet might have perceived minimal impact, only when taken with other impacts will its individual impact be exacerbated. The Applicant should consider this in their analysis, so that all impacts are taken as a whole, however minor they may appear on an individual basis.

9. We are concerned regarding the coalescence of the proposals with other proposals in the area at NNSUE (Overstone Leys etc) and in the West Northants Council Regulation 18 Local Plan, effectively eliminating the rural element which was and is the main concern of our Parishioners. This is allied to Northamptonshire in general being over-developed with the proposed Solar Farm, HS2, Warehousing Parks, the dualling of the A43, housebuilding etc.

At a very local level, the Sywell Road through Holcot is the *de facto* northern ring road for Northampton and whilst this road is classified by the Applicant as ‘a local road’ per the definition, it should be included in all road-related assessments as a significant route. (15.4.62 Page 258)

10. For Green Hill B, viewpoints should also be included for Grange Farm and Rectory Farm to the south (off the A43), and for all residential properties on Sywell road to the North. (Table 7.2 Page 128)

11. Viewpoints should be included for Grange Farm and Rectory Farm to the south (off of the A43), and for all residential properties on Sywell Road to the North. (Table 7.2 Page 128)

12. Photomontages from visual locations where significant effects are not predicted should be included. (7.7.7 Page 135)

13. Chapter 18 does not propose assessment of the non-economic impacts on people’s lives from a major development of this nature (eg; rurality – people live in rural settings mostly through choice). Assessment of this nature should be included. (Chapter 18 Page 288)

14. Pages 200-201, Table 10.4 of the SR (ground contamination) proposes to exclude matters which should, in our view, be included in the ES. Ditto pages 349 - 350, Table 24.1 (topics proposed to be scoped out) (see further below)

Further, with reference to Table 10.4,

- page 351 likely significant noise and vibration effects related to the operation of the BESS should be assessed.

- page 351 glint and glare – the likely significant effects on public rights of way used by those on horseback (and equestrian facilities), plus the two nearby Airfields in particular Sywell Aerodrome but also Pitsford should be assessed. Sywell has significant air traffic movements making the potential for glare a major safety issue.
- page 351 likely significant effects from electromagnetic fields and ionising radiation arising from BESS, substations, transformers and PV inverters during operation should be assessed.
- pages 351-352 human health – community safety impacts from risk of fire and contamination (and radiation) should be assessed (see further below).
- page 352 arboriculture – likely significant effects on trees in Sites A-G and BESS should be assessed (see further below).
- page 352 other environmental matters – likely significant effects of light pollution, potential accidents and disasters should be assessed. (Light pollution, moreover, should, we consider, be the subject of a separate chapter and not simply referred to, without detailed assessment, in the L&V chapter.

With reference to the foregoing, we feel that

- the uncertainty around the siting (and number) of BESS and the associated transformers of differing sizes in the scoping report is unacceptable.
 - In the context of the local rural environment these are large and potentially hazardous installations requiring an extensive industrial setting.
 - With reference to the guidance for applicants quoted above, we regard this as ‘a high level of uncertainty... around key design elements of the Proposed Development’.
 - Therefore, we feel it is unreasonable to scope out any risk of ‘ground contamination ...spillages or leakages of fuels and chemicals... leaching of chemicals from faulty battery incidents (fire damage, ash deposition and extinguishing waters)’ in the construction, operational and decommissioning phases.
 - Despite industry safety measures, battery failure, fire and explosion are well documented in BESS worldwide, and the siting of the BESS in relation to features of the built and natural environment (and people) could be critical. For example, proximity to ancient woodland, crops and watercourses. Of particular concern is the fact that the proposed site B drains down to Pitsford Reservoir any BESS sited here could drastically affect our water supply.
- as regards Glint and Glare (Chapter 15), we do not agree with the contention that the sensitivity of ‘local roads, horse facilities and PROW’ should be regarded as ‘low’ (page 252, Table 15.1). Nor do we agree that ‘glare coinciding with direct sunlight’ (page 251, para 15.4.11) is a mitigating factor. For example, depending on the geometry, a walker, driver or equestrian might deliberately look away from the sun only to be met by reflected glare from solar panels. That cannot sensibly be regarded as mitigation. The applicant states (page 257, para 15.4.56) that ‘The reflection intensity for solar panels is similar to common outdoor sources of solar reflection (e.g. still water)’. We consider that solar reflection from still water can be a very significant source of glare and therefore the extensive addition of

its equivalent to our local environment where it has never previously existed should be scoped in for *all local receptors*.

- as regards Impacts on trees in Green Hill A-G and BESS (Chapter 20), the applicant has requested that these potential impacts should be scoped out because of the 'embedded mitigation of designing the scheme... and further mitigation that will be included within the OCEMP'. (20.7.1-3 and Table 20.4). Whilst we note the intended mitigation, proposed trees will take many years to grow. We consider that the nature and extent of the proposed loss need to be assessed, as well as the proposed mitigation measures.
- As regards other environmental matters (Chapter 22), the applicant identifies a number of major accidents and disasters which could occur (e.g. BESS fire and explosion) and argues that these will be addressed through existing technical assessments and plans such as the Outline Battery Safety Management Plan. It further states that the 'design of the Scheme will evolve during preparation of the DCO application' and that where risks had not previously been identified the design team will address them as necessary through the design process. It argues therefore such major accidents or disasters should be scoped out from the ES. (page 337, para 22.4.5 and Table 22.2). We don't accept this argument and consider that they should be scoped in. Unless the likely significant environmental effects are assessed, the appropriateness of any proposed mitigations cannot be assessed.

Yours sincerely

Ruby Cole

Ruby Cole (Mrs)
Clerk & RFO
Holcot Parish Council

Copied to:

Stuart Andrew: Member of Parliament for the Daventry Constituency

Cllr Mike Warren: West Northamptonshire Ward Councillor. Moulton Ward

Holcot Parish Councillors