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17<sup>th</sup> December 2024

Lesley Giles  
Project Development Manager  
Island Green Power  
Unit 25.  
7 Coda Studios  
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Dear Ms Giles,

**Re: Island Green Power - Green Hill Solar Farm  
Launch of public consultation 7 November - 19 December 2024**

Thank you for your letter dated 1<sup>st</sup> November 2024 regarding the above. Here is the response from Holcot Parish Council to your consultation.

Below are our comments on your proposals. As a community we are not opposed to solar-generated energy but do not wish to see productive farmland being used to house solar panels.

## Overarching comments

### 1. Our opposition to your proposals

**As a community we are not opposed to solar-generated energy.** Indeed, the Parish Council have recently supported a small installation on a local farm and many parishioners have installed solar panels on their houses. Our concerns with this project relate to its sheer scale and impact upon swathes of the local countryside - so many rural communities will be blighted by fields of solar panels and the assorted equipment, fences, lighting etc that is installed with them. The proposed solar farm would create a coalescence with the proposed site B and the planned expansion of the Northampton North SUE. It would create a further coalescence between Mears Ashby and Earls Barton completely changing the landscape and visual impact.

The project will dominate the local landscape, with substantial adverse visual affects at all stages of its life. Your proposals give rise to substantial impacts on rurality, visual and activity amenity - people choose to live in rural settings and your proposals will fundamentally change so many people's lives. There is little in your proposals that suggests that you want to ameliorate those impacts, with comments about what might be done, rather than what would be done.

Similarly, whilst you say this is only a very small proportion of national productive farmland, it has a substantial impact on the stock of farmland locally. You do not propose anything that will compensate for the impacts on the productivity of the farmland. This is particularly relevant with the substantial amount of farmland that has already been lost in Northamptonshire due to extensive development of housing, logistics facilities and HS2. To maintain food security we cannot lose a further 3,000 acres to a Solar Farm.

The glint and glare from a major 3,000 acres Solar Farm would create a safety risk to Sywell Aerodrome and surrounding communities including Holcot. In 2024 the Aerodrome held a major Airshow over 2 days including displays from the Red Arrows, F35, 747, 9 spitfires. Sywell Aerodrome is host to several WW2 planes as well as the base for Sloane Helicopters.

## **2. Local impacts, no local benefits**

**There is no pecuniary or social benefit for local communities - all of the impacts will be felt locally, but there is no tangible benefit locally.**

For instance, the construction process is going to be impossible to manage with minimal impact on affected communities - nature of sites, access, cabling, vehicle movements, noise etc. You note this in your documentation, but the proposals for managing these impacts in practical terms are scant. There is not a sense from the documentation that minimising impacts on local people would be high up your priority list if a DCO is approved.

## **3. Controls over the Farm**

**What sanctions are available when GHSF does not manage the build properly, maintain the sites during the operational phase, etc?** We have seen from other similar projects that once a project is approved, or indeed operational, it becomes purely an arms-length income generating investment that is sold on to Infrastructure Funds etc.

Your proposals do not deal with the long-term commercial aspects of the project. For instance;

- in the event of a sale what protection is there to the local communities over benefits, planning conditions and operating restrictions?
- How will the decommissioning in 60 years be achieved? Will there be a financial bond for the end of 60 years to ensure that the sites can revert to arable?
- What controls will be put in place to manage the local impacts of situations where the Farm needs changes during the construction or operational phases?

You will appreciate that we are very uncomfortable that there will be no recourse or effective impact analysis/mitigation were a DCO to be approved.

#### **4. Inadequacy of proposals**

**We are being consulted on incomplete plans** - at PEIR NTS 1.1.11 you say “The information contained in the PEIR is preliminary and may not represent the final project design or include the final EIA considerations and conclusions.” Our conclusions can only be based on what we know and are consequently necessarily general. GHSF needs to engage communities again once they have firm plans, but this is not implied by the documentation as the final information is described as accompanying the DCO.

For instance, we need to see the cabling route and its effect on local communities and the detailed layout of each site to see the effect on the local communities.

I have included an attachment with specific comments on your proposals.

In conclusion, we remain opposed to this scheme in view of its sheer size of over 3,000 acres in a heavily developed County, along with the further loss of productive farmland.

I would be grateful for your acknowledgement.

Yours Sincerely



David Walker  
Chair  
Holcot Parish Council

#### ***Copied to:***

*Island Green Power UK Ltd*

*Stuart Andrew: Member of Parliament for the Daventry Constituency*

*Stephanie Gibrat: Assistant Director, Planning and Development, West Northamptonshire Council  
Planning Inspectorate - Green Hill Solar Farm*

*Cllr Mike Warren: West Northamptonshire Ward Councillor - Moulton Ward*

*Cllr Daniel Cribbin: West Northamptonshire Ward Councillor - Moulton Ward*

*Cllr John Shephard: West Northamptonshire Ward Councillor - Moulton Ward*

*Holcot Parish Councillors*

*Holcot Parish Council Website*

Attachment : Specific Comments (all PEIR NTS unless stated)

Ref	Comment
2.4	<p>Cumulative Impacts</p> <p>The cumulative impacts on Holcot are substantial. How will the GHSF development mitigate their impacts when they are layered on substantial impacts from other local developments, particularly in respect of traffic and road safety?</p>
4.1.20	<p>Associated infrastructure</p> <p>The masterplan provided does not show the associated fencing, lighting and security. How will these features impact the rurality of the settings? What will the impact be on nocturnal fauna?</p>
4.2.4	<p>Construction hours</p> <p>Local roads, particularly Sywell Road, are busy outside the 'traditional' peak hours quoted - these need to be extended by around an hour each side and the implications considered accordingly.</p>
4.2.7	<p>Site access</p> <p>Cable route search areas are not mentioned in respect of site access. Presumably these will generate significant access requirements?</p>
4.2.8	<p>Site access</p> <p>4.2.8 says that sensitive routes through villages have been avoided wherever possible. We are unable to find these routes in the detailed documentation. Local roads are ill-suited to traffic of the nature mentioned.</p> <p>Holcot lies in a 7.5t regulated zone, but is already blighted by HGVs flouting the regulations.</p> <ul style="list-style-type: none"> <li>• How will GHSF prevent HGVs flouting the regulations when they access site B from Sywell Road?</li> <li>• Will vehicles be required to access only from the A43? We need assurance that there will be no HGVs travelling through the village and minimal non-HGV traffic. The Brixworth Road/Sywell Road route is already the <i>de facto</i> northern ring road for Northampton but is absolutely ill-suited to this role. Consequently, the #1 issue for Holcot people is road safety. We note that in Chapter 13 Figure 13.2, this issue is understood, although cars and LGVs will still be passing through the village.</li> <li>• What are the impacts of A43 dualling construction that is likely in a similar timeframe?</li> <li>• Plans show an access route from Moulton Road via Tithe Farm. If this route were used by HGVs or any vehicles it would necessitate traffic coming through Holcot and/or Moulton villages. This should be removed from consideration.</li> <li>• Will a Banksman or similar role be sited at the entrance to site B (or at the crossroads in Holcot) to ensure that HGVs do not pass through the village?</li> </ul>

Ref	Comment
	<p>In Volume 3, Appendix 13.1 the sensitivity of routes is discussed.</p> <ul style="list-style-type: none"> <li>• LinkID 26 (Brixworth to Holcot) is 'medium' sensitivity - for reasons discussed above, this is a problem route and should attract a 'high' assessment.</li> <li>• LinkID 27 (A43-Sywell Road) is 'negligible' sensitivity on your assessment - similarly, this is not the case. For instance, in Volume 1, 13.10, you assess there will be less than 1% impact on HGV volumes - this is an assessment that ignores the fact that there <u>should be</u> close to zero HGVs exceeding 7.5t on this route.</li> </ul>
4.2.17	<p>Decommissioning Phase</p> <p>We are unable to find in the documentation how the applicant is intending to ensure that there is adequate funding available for the decommissioning phase. What is planned? What will happen if the site is sold, will funding rollover to the new owner? How will the standards for decommissioning be set and then monitored, during the 60-year lifetime?</p>
5.2	<p>Scale of benefits</p> <p>Smaller schemes would in aggregate deliver the same purported climate and energy security benefits, without the disbenefits of a large-scale scheme. Smaller schemes would be much more sympathetic to the rural nature of the area.</p>
8.5.5	<p>Visual effects</p> <p>Mitigation planting - 15 years to demonstrate mitigation is too long. Mitigation should be immediate term.</p>
10	<p>Flooding</p> <p>With solar panels being a hard surface, what is the expected impact of Site B on Sywell Road in respect of water runoff? Sywell Road already has a flooding problem - is there a potential for exacerbating this through your design?</p>
15.4.4	<p>Glint and glare</p> <p>The impacts of glint and glare on aviation needs to take account of through movements - for instance, the Red Arrows often fly through the area at fairly low altitude.</p> <p>Similarly, Sywell Aerodrome held a major Airshow in 2024 featuring the Red Arrows, 747, F35 and 9 spitfires. Glint and Glare from a 3,000 acre Solar Farm would present a major safety risk in a built up area.</p>
25.1.6	<p>Cumulative effects</p> <p>Traffic and road safety should be a topic chapter. Holcot suffers from the cumulative effects of existing developments, and any further developments will exacerbate this.</p>

## Specific comments (other)

Reference	Comment
Site B design	The site access route is crossed by a footpath between Holcot and Overstone. Traditionally this is a very safe route, with very-rare agricultural traffic movements. Local people routinely walk the route with free-roaming dogs for instance. How will GHSF ensure the continuing safety of users during the construction and operational phases, so that this utility continues?
13.4.5 Chapter 13	Danger of Access point to Green Hill B. Clause 13.4.5, states “Technical considerations such as achieving suitable visibility has also been assessed.” This isn’t the case as the proposed access point is close to the blind bend at the top of the hill on Sywell Road where accidents occur regularly particularly in bad weather. This danger means that in Table 13.2, Sensitivity of Receptors that it is an Accident Blackspot and as such there is a High sensitivity on the Sywell Road. As a result the Sywell Road should be noted as High Sensitivity in Table 13.6, not low or negligible as described in point 13.7.2 and safety measures applied accordingly.
13.6.11 Chapter 13	The report fails to mention the 7.5 Tonnes limit in Holcot in 13.6.13 Green Hill B. However in 13.6.8 Green Hill E Mears Ashby Road’s 7.5 tonne limit is mentioned. This is a failure of GHS methodology as described in 13.9.5.
Table 20.9, Chapter 20	What Brown Field sites were targeted for this development as the land on site B (Holcot) states 42% of the land is identified in their table 20.9 as being grade 2 and 3A, which the guidelines say is the least preferable? Were locations based on which landowners said ‘yes’ to your proposals rather than targeting less poor agricultural land and brownfield sites?