



The countryside charity
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Ms Theresa Nicholl
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14th May 2025

by email to theresa.nicholl@northnorthants.gov.uk

Dear Ms Nicholl

NK/2025/0167: Kettering Energy Park, Burton Wold (Hybrid Outline Application)

CPRE Northamptonshire writes to lodge a formal objection to planning application NK/2025/0167 for a proposed Energy Park at Burton Wold. This objection is based on our statutory remit to protect and promote the countryside for its intrinsic character, landscape value, biodiversity, and amenity. Our objection draws upon a wide body of technical evidence, statutory requirements, and planning policy breaches detailed in the comprehensive summary document submitted by other local objectors dated 14 May 2025.

We ask that this application be refused on the following grounds:

1. Inappropriate Development in Open Countryside

The proposed development is located in open countryside, far removed from strategic employment areas and sustainable transport links. The scale of proposed industrial development is incompatible with the site's landscape character, rural tranquillity, and biodiversity value. This is in clear breach of:

- **JCS Policy 1(d)** (Presumption in Favour of Sustainable Development);
- **JCS Policy 13** (Rural Exceptions);
- **JCS Policy 24** (Logistics Development – which requires that B2/B8 proposals be located in designated Strategic Employment Areas only);
- **JCS Policy 25**, which supports sustainable opportunities to diversify the rural economy only where they are of an appropriate scale for their location and respect the environmental quality and character of the rural area;
- **JCS Policy 26** (Burton Wold Energy Park – requiring a masterplan and stakeholder consultation);

- **NPPF (2024) Paragraphs 174–176** (protecting and enhancing valued landscapes and the intrinsic character and beauty of the countryside);
- **Local Plan Part 2 (Kettering)**, which confirms the rural designation and absence of site allocation.

The proposal is a speculative expansion of warehousing and logistics under the guise of an energy park, which CPRE regards as classic greenwashing. This proposal fails on all counts: it is of excessive scale, industrial in nature, visually intrusive, and incompatible with the surrounding rural landscape and communities.

2. Loss of High-Quality Agricultural Land

The development would result in the irreversible loss of Best and Most Versatile (BMV) agricultural land (Grades 3a) and Good classification (3b) land, undermining food security and sustainable land use. This will also increase food-miles and the carbon footprint of the current manufacturers and wholesalers to whom the current crops are sold. This directly conflicts with:

- **NPPF Paragraph 187(b)**;
- **JCS Policy 22 (a)** (Safeguarding land resources);
- **Environment Act 2021** duties to promote sustainable land management.

The applicant fails to demonstrate that no alternative lower-grade land is available.

3. Severe Transport and Access Constraints

The scheme is based on 24/7 operation and intensive HGV movements via the A510 and A6, through rural settlements already suffering from congestion, air pollution, and accidents. The submitted Transport Assessment fails to assess cumulative impacts, construction-phase risks, or sensitive receptors. The scheme:

- Breaches **JCS Policy 15** (Delivering a Connected Local Transport Network);
- Conflicts with **NPPF Paragraphs 100–104** (Safe and suitable access);
- Undermines local efforts to promote sustainable travel.

4. Biodiversity and Habitat Harm

The development lies adjacent to functionally linked land for the Upper Nene Valley Gravel Pits SPA and Ramsar site. It is also situated alongside the Cranford SSSI and a number of designed Local Wildlife Sites (LWS). Habitat and species surveys are outdated, or seasonally invalid, while the Biodiversity Net Gain (BNG) strategy is vague, deferred, and undeliverable. This contravenes:

- **NPPF Paragraph 197**;
- **Environment Act 2021** (BNG requirements);



- **JCS Policies 4, 19 and 20;**
- The applicant's statutory duty under Section 40 of the **NERC Act 2006**.

There has been no Appropriate Assessment as required under the **Conservation of Habitats and Species Regulations 2017**.

5. Visual Intrusion and Landscape Harm

The development is visible for miles across the Rockingham Forest National Character Area (NCA) and the Northamptonshire Vales (NCA), as such it would dominate local viewpoints. The LVIA lacks a Zone of Theoretical Visibility (ZTV) and omits viewpoints from key locations, such as the Waterloo Panorama monument. This breaches:

- **NPPF Paragraphs 194–195;**
- **JCS Policies 3 and 8** (Protecting landscape character);
- **Heritage statutory duties** under the **Planning (Listed Buildings and Conservation Areas) Act 1990**.

6. Inadequate and Unlawful Environmental Impact Assessment (EIA)

The submitted EIA is procedurally defective under the **Town and Country Planning (EIA) Regulations 2017**, as it omits baseline surveys, cumulative impact assessments, and mitigation modelling. It fails to:

- Satisfy **Regulation 18(3)** and **Schedule 4**;
- Address indirect impacts on sensitive receptors;
- Provide meaningful alternatives or mitigation.

Case law confirms that such defects render the application unlawful (e.g. **R (Blewett) v Derbyshire CC [2003] EWHC 2775**).

7. Community Engagement Failures

CPRE Northamptonshire was not directly consulted, nor were key parishes and towns, all of which have written in objection to the scheme on numerous occasions. This contravenes:

- **NPPF Paragraphs 47–49;**
- **JCS Policy 26** (requiring stakeholder engagement);
- The principles of fair and proportionate consultation under **Planning Practice Guidance**.

8. Greenwashing and Misrepresentation

The so-called 'Energy Park' would be a net energy consumer, not generator. The applicant has failed to show:

- That the hydrogen plant and BESS offer any carbon benefit;
- That renewable power sources are secured;
- That lifecycle emissions are modelled;
- That the sites based solar PV could supply the needs of the proposed development and advanced agriculture.

The proposal is misleading and does not contribute meaningfully to climate goals. It contradicts:

- **NPPF Paragraphs 161, 163, 165;**
- **JCS Policies 1 and 9;**
- The Government's **Net Zero Strategy**.

Conclusion

In light of the extensive technical, policy, legal, and environmental objections outlined above, CPRE Northamptonshire urges North Northamptonshire Council to reject application NK/2025/0167. The proposal represents an unjustified, inappropriate, and harmful intrusion into open countryside and conflicts with the plan-led system. It fails to meet the legal, environmental, and policy tests required of sustainable development. It also conflicts with **JCS Policy 25**, which requires rural economic proposals to be of a scale and form appropriate to their countryside setting. The scale and nature of this proposal is not compatible with that requirement and sets a dangerous precedent for speculative logistics-led encroachment into Northamptonshire's rural landscapes.

We ask that this objection be recorded formally and that CPRE Northamptonshire be included in all future consultations on this or any related applications.

Yours sincerely,

Alan Mayes

Hon. Technical Secretary
CPRE Northamptonshire



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