



The countryside charity
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Application by Green Hill Solar Farm Ltd. for an Order granting Development Consent for a proposed solar development on land between Northampton and Wellingborough

**CPRE Northamptonshire
Written Representation Summary
November 2025**

Introduction

CPRE Northamptonshire judge the acceptability of solar schemes against harms to the landscape and the communities that live within it.

Scheme Design

Spatial planning concentrates harmful developments into a limited area. The Green Hill scheme does the opposite by distributing the scheme over 9 sites. It even scatters separate blocks of panels within some sites. The consequences of this are:

- It appears as at least eight separate PV schemes and the BESS
- A greater area is adversely compared to a single site scheme
- The land take is significantly greater
- Villages feel surrounded by panels

60-year permission

It is not in the national interest to commit the 9 sites for 60 years. It removes the flexibility to react to climate changes which cannot be predicted over such a long period. Additionally other means of generation may supplant solar PV.

Natural England and the Climate Change Committee are already raising concerns about the lack of progress to address food security, mitigation and adaptation. Solar deployed in the built environment may also remove the need for ground mounted schemes.

Climate change

Climate change is a global problem and it is important to ensure that overall emissions are reduced and not pushed to another site. It is important to understand and quantify the benefits and not accept misleading statistics.

Solar PV is intermittent and there is a limit as to how much can be absorbed into the grid. The BESS would at best only store 4 hours of electricity and so does not solve intermittency.

Meeting targets

20GW of solar PV is already deployed, 22GW are being built or awaiting construction and 12GW is in the planning system. It is very unlikely that the 2030 target will be missed because of lack of permissions. The greatest risk is that schemes cannot be built out fast enough.

The Climate Benefits of the Scheme

The scheme would annually output would be the equivalent of a 70MW or 65MW power station. However, in winter when demand is greatest this could be as low as 15MW.

The BESS will be probably primarily used for arbitrage and would discharge in at most 4 hours.

The BNG achieved on site could well be counteracted by losses on another site if that site is converted into intensively farmed land to replace the lost food supply.

The Climate Disbenefits of the Scheme

The scheme would reduce food security and increase food miles for Weetabix who try to source grain locally. It is also likely to increase car journeys for residents in the area as they choose to travel to spend their leisure in unspoilt countryside.

Landscape and Visual Impact

We have many concerns with the LVIA and the way in which it has been prepared and presented:

- the assessment methodologies used are more lenient than in other LVIAs
- the viewpoints were agreed without knowing the scheme design and would not have been chosen had the design been known
- there are multi-purpose viewpoints that do not adequately represent the impact that would have been evident for two single purpose viewpoints
- most viewpoints do have photomontages or wireframes and give little indication of the impacts
- photomontages do not show the winter impacts after 15 years
- undue credence is given to the effectiveness of screening especially in an undulating landscape
- screening would adversely change the character of the landscape not benefit it
- too little consideration is given to the impacts on local receptors
- the assessment of sequential cumulative visual impact is inadequate
- some of our PEIR consultation responses are excluded from the consultation appendix and have not received a response:
 - viewpoints should be adjusted when foreground clutter interferes with the view
 - viewpoints should be shown overlaid on the augmented ZTV diagrams
 - many study areas are too small in a landscape with open views

Sequential Cumulative Impact

Sequential cumulative impacts are not adequately considered and unduly restricted to A roads. They should relate to real journeys not just short sections of road. The journey from Olney to Wellingborough would pass 6 blocks of solar panels. The journey from Bozeat to Lamport Hall would encounter almost every site along the 17 mile journey.

LVIA Conclusions

We have significant concerns about the LVIA. We feel that there are significant flaws in the way in which it has been prepared which result in some impacts being understated and others not being assessed at all.

We feel that it is important to place significant weight on the impacts that would be experienced in the many years before the mitigation is effective and not to dismiss what may well prove to be over half of the schemes operational period in the event that repowering does not take place.

Ecology

The scheme changes the nature of Functionally Linked Land that is important to the Upper Nene Valley Gravel Pits SPA and RAMSAR site. The Appeal for a smaller scheme further from the SPA was dismissed primarily because of its impact upon the Functionally Linked Land.

We are also concerned about the risk of pollution in the SPA in the event of a battery fire.

Cultural Heritage

The scheme would harm the setting of conservation villages by surrounding them with industrial scale panels.

Transport and Access

The assessment does not reflect that the country roads are well used by cyclists, walkers and some pedestrians. We are concerned that equestrian roads linking routes may not all be included.

The applicant has acknowledged that Access F.2 can be reached from Access F.3 and we feel that Link 81 should now be removed from the scheme.

Noise

The usual evidence from noise monitoring is not present in the DCO.

Some representative noise monitoring was carried out by a busy road yet the properties that it is supposed to represent are set back from the road. We also feel that the modelling has incorrectly used the best-case attenuation factor. Both compromise the noise results.

Glint and Glare

We are concerned that glint or sudden glare may cause horses to bolt. The suggestion that this would be prevented by screening fails to consider how long the risk will be present and it assumes that mature screening would be dense enough in winter to prevent any light getting through.

Air Quality

There is far too little detail about the consequences of a BESS fire and how the public and livestock would be protected from it.

Socio-Economics, Tourism and Recreation

The scheme would have an adverse impact on the countryside that attracts tourists. It would have a severe impact on equestrian businesses whose rides would be affected and on the tenant farmers who would lose land to the scheme.

The applicant acknowledges that the scheme would result in net job losses and losses to the local economy. They suggest that the ground rents would offset the local economic losses but we disagree because these would be paid to absentee landowners.

Human Health

The stress of the potential of the scheme is already affecting mental health. However, if the scheme is developed it would significantly change the way of life of residents; first while they live through two years of construction, and afterwards when they lose the mental uplift derived from living in a rural environment. They will also be less likely to take exercise in the countryside which would affect their physical health.

Agricultural Circumstances

The scheme is 70.6% BMV which is strongly discouraged in NPS EN-3. The land take is greater than for comparable schemes because a third would not be used for solar generation.

It must be assumed that agricultural use will not continue because the applicant has made no firm plans to enable it. All solar scheme applicants suggest that grazing could take place but it very rarely does.

It is doubtful that the soils could be restored to BMV at the end of the scheme life because of the impacts of construction, maintenance and decommissioning.

Major Accidents

It is essential that a BESS fire is modelled and assessed especially for a BESS so close to communities.

A comprehensive Emergency Response Plan should be agreed with local emergency teams and submitted as part of the DCO.

Other Matters

We are disappointed with the consultations and the fact that most concerns raised have been dismissed or ignored. The structure of the DCO seems unnecessarily complex and a physical copy was not made publicly available.

Any community fund must be inherently tied to the scheme so that it cannot be lost on change of ownership. A fund or bond should be secured to guarantee decommissioning.

Conclusions

CPRE find this scheme to be particularly harmful and it fails on all of our criteria. The scattered design causes harms over a much greater area than a compact scheme. We conclude that the amount of renewable energy produced does not justify the many significant harms to the countryside and those that live and work within it of the impact on food security.

CPRE Northamptonshire

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