Campaign to Protect Rural England Northamptonshire

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FORMAL PRE-DETERMINATION REPRESENTATION

Planning Application: NK/2025/0167
Development: Kettering Energy Park, Burton Wold, Wold Road, Burton Latimer
Applicant: First Renewable Developments Limited
To: Head of Development Management and Planning Enforcement, North Northamptonshire Council
Date: 31 October 2026

Subject: Kettering Energy Park (NK/2025/0167) – Outstanding statutory, policy and evidential requirements prior to determination

Dear Sir/Madam,

1. Introduction and purpose

CPRE Northamptonshire submits this formal pre-determination representation concerning planning application NK/2025/0167 for the proposed Kettering Energy Park at Burton Wold.

CPRE Northamptonshire is the county branch of the Campaign to Protect Rural England and a registered charity concerned with the protection and enhancement of Northamptonshire's countryside, landscapes and rural communities. We recognise the importance of sustainable economic development, renewable energy generation and the provision of appropriate employment opportunities.

However, such development must be planned and delivered in accordance with the statutory planning framework, supported by reliable environmental and technical evidence, and designed to minimise avoidable harm to the natural environment and local communities.

The Kettering Energy Park application raises questions of considerable significance extending beyond the immediate application site. These concern the interpretation of adopted planning policy, the adequacy of environmental assessment, the protection of designated habitats, the provision of essential infrastructure and the appropriate use of planning conditions to address outstanding matters.

CPRE is particularly concerned that a substantial body of technical evidence, including material provided by local objectors and disclosures obtained from National Highways, has identified unresolved issues which go directly to the basis upon which planning permission could lawfully and reasonably be granted.

This representation does not seek to repeat every objection previously submitted concerning the application. Instead, it identifies the principal findings that North Northamptonshire Council (NNC) should be able to demonstrate before reaching a decision, and particularly before making any recommendation to approve.

Our purpose is to ensure that the eventual determination is based upon an accurate understanding of the proposed development, the applicable planning policies, the environmental consequences and the effectiveness of the mitigation proposed.

CPRE Northamptonshire submits that the application should not be recommended for approval unless the Council can demonstrate that the applicable statutory assessment requirements have been satisfied, that the proposed development has been properly assessed against the adopted development plan and national policy, and that the evidence is sufficiently complete and reliable to support the conclusions reached.

2. The statutory and policy basis for determination

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The North Northamptonshire Joint Core Strategy (JCS), adopted in 2016, remains part of the statutory development plan.

CPRE recognises that the National Planning Policy Framework published in August 2026 introduces significant changes to national planning policy, including stronger support for business development and strategic logistics.

We also recognise the significance of the Planning Inspector's decision of 22 October 2025 concerning Land East of Halden's Parkway, Thrapston, which concluded that elements of JCS Policies 11, 23 and 24 were out of date in their application to strategic logistics development.

However, that decision did not establish that every employment-related policy in the JCS is out of date.

Nor did it determine the status of Policy 26, which specifically addresses renewable and low-carbon energy development at Burton Wold.

Annex A of the August 2026 NPPF is explicit that development-plan policies should not receive reduced weight simply because they were adopted before the new Framework. The relevant consideration is whether the policy, or a particular provision of it, is materially inconsistent with national decision-making policy.

The Council must therefore distinguish between policies which have become materially inconsistent with the NPPF and those which continue to provide relevant and applicable development-plan requirements.

For Kettering Energy Park, this distinction is fundamental.

CPRE requests that NNC identifies precisely which provisions of the adopted JCS it considers applicable, which provisions it considers materially inconsistent with the August 2026 NPPF, and the reasons for any reduction in weight.

Any departure from the adopted development plan must be clearly identified and justified through the statutory planning balance.

3. Policy 26: the essential purpose and character of Kettering Energy Park

The central policy consideration for this application is JCS Policy 26, *Renewable and Low Carbon Energy*.

Policy 26 specifically identifies land at Burton Wold for an Energy Park intended to link renewable energy production to existing and planned development through a decentralised energy network.

The policy also requires proposals to comply with its relevant criteria and to accord with a comprehensive masterplan prepared in consultation with local communities and stakeholders and agreed by the local planning authority.

The masterplan is intended to define development boundaries, renewable and low-carbon technologies and land uses, provide for complementary employment uses, and demonstrate how the proposal will contribute towards meeting the energy requirements of existing and planned development.

This includes East Kettering Sustainable Urban Extension, strategic development at Junction 10 of the A14 and employment uses associated with the Energy Park.

These requirements distinguish Burton Wold from an ordinary strategic employment or logistics allocation.

3.1 Absence of an agreed comprehensive masterplan

CPRE understands that correspondence issued by NNC on 6 May 2025 confirmed that the developer's submitted masterplan could not be approved.

The consideration of earlier masterplan proposals by the Council's Executive Advisory Panel did not constitute formal approval by the local planning authority.

Nevertheless, subsequent applicant documentation has continued to rely upon the masterplan process in support of the planning application.

This creates a fundamental issue of development-plan compliance.

NNC should make an explicit finding as to whether the application complies with the masterplan requirements of Policy 26.

If it does not, the Council must identify the resulting policy conflict and determine the weight to be given to that conflict.

If the Council considers that the masterplan requirement is no longer applicable, or should receive reduced weight, it must explain the specific policy and evidential basis for that conclusion.

The absence of an agreed comprehensive masterplan cannot simply be disregarded because the applicant has submitted its own masterplan documentation.

3.2 The proposed decentralised energy network

The applicant's subsequent energy and infrastructure submissions have materially clarified the intended operation of the Energy Park.

These indicate that individual occupiers would be supplied through an independent distribution network operator, that there would be no private-wire network linking renewable generation directly to all employment occupiers, and that rooftop photovoltaic generation would principally serve the individual host buildings.

Ground-mounted photovoltaic generation would be exported to the electricity network.

The applicant has not demonstrated an arrangement through which renewable electricity generated at Burton Wold would directly supply the East Kettering Sustainable Urban Extension or strategic development at Junction 10.

The distinction between these arrangements and the decentralised energy network envisaged by Policy 26 is significant.

The provision of electricity infrastructure, including a primary substation and distribution network, does not necessarily demonstrate that the specific energy-integration objectives of Policy 26 have been achieved.

CPRE therefore requests that NNC obtains or identifies a clear technical assessment explaining how the proposed electricity generation, distribution, import, export and consumption arrangements satisfy Policy 26.

3.3 Whether the proposed employment development is genuinely complementary

The application includes very substantial employment development, including B2, B8 and other uses associated with advanced agriculture and potentially data centres.

The scale of these activities raises the question of whether they are complementary to the renewable energy development, as envisaged by Policy 26, or whether the employment development has become the principal purpose of the proposal.

The applicant's own energy-demand scenarios suggest that the employment activities could represent substantial additional electricity demand.

This is not necessarily incompatible with an Energy Park, but it requires a clear explanation of how the proposals fulfil the particular objectives of Policy 26.

CPRE submits that the Council must examine the actual functional relationship between renewable generation and the employment development, rather than assume that their co-location is sufficient to establish policy compliance.

4. The August 2026 NPPF and the proposed land uses

The new NPPF provides significant support for sustainable economic growth and strategic logistics development.

However, an identified need for additional logistics land does not establish that every form of industrial development is appropriate in every location.

The Kettering Energy Park proposal encompasses several different potential land uses.

NNC must therefore assess the application against the national and local planning requirements applicable to the development actually proposed.

In particular, CPRE requests clarity regarding:

1. The maximum floorspace authorised for each proposed use, including any mezzanine accommodation;
2. The relationship between the different advanced-agricultural floorspace figures appearing in the applicant's documentation;
3. The proportion of development that would genuinely address identified B8 logistics demand;

4. Whether the environmental and infrastructure assessments reflect the full range of potentially permitted occupiers and operations; and
5. Whether there are enforceable arrangements securing the land-use assumptions relied upon in the planning and environmental assessments.

The Council should not apply the particular national policy support for freight and logistics indiscriminately to industrial, agricultural or other activities which may have materially different impacts and locational requirements.

CPRE also requests that the economic justification is considered in the context of other strategic logistics permissions, commitments and applications within North Northamptonshire.

This includes the proposed Nunnery Farm development at Rothwell, should it remain relevant at the point of determination.

The assessment should distinguish between the existence of a strategic need and the suitability of the Burton Wold site to accommodate the particular development proposed.

5. Environmental Impact Assessment: the adequacy of the evidence

The Kettering Energy Park application is EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The requirements of these Regulations are distinct from the ordinary weighing of planning benefits and harms.

Regulation 18 requires an Environmental Statement containing the information necessary to assess the likely significant environmental effects, including the relevant information specified in Schedule 4.

Regulation 25 provides for further information where the Environmental Statement requires supplementation.

Regulation 26 requires the local planning authority to examine the environmental information, reach a reasoned conclusion on the significant effects of the proposed development and integrate that conclusion into its decision.

The Council must be satisfied that the reasoned conclusion is up to date when planning permission is granted.

5.1 The Regulation 25 process

NNC has already required substantial further environmental information from the applicant.

The applicant subsequently submitted an Environmental Statement Addendum and associated documents addressing a range of technical matters.

However, the submission of additional material does not necessarily demonstrate that the original deficiencies have been resolved.

CPRE requests that NNC undertakes a systematic assessment of the application against the requirements of its EIA Scoping Opinion, Regulation 18 and Schedule 4.

That assessment should establish whether each relevant topic has been adequately addressed and whether the information remains sufficiently current.

5.2 Inconsistencies in the development parameters

The applicant's documentation has contained differing descriptions and figures concerning advanced agriculture, mezzanine floorspace, energy infrastructure and other proposed activities.

These differences are potentially material because they may affect the assessment of traffic movements, energy requirements, water consumption, wastewater generation, emissions and environmental risks.

NNC should identify the definitive development parameters and demonstrate that the Environmental Statement assesses the realistic worst-case effects of the development that could be permitted.

It should also confirm that the proposed planning conditions would prevent subsequent development exceeding the assessed parameters.

5.3 The assessment of reasonable alternatives

The original justification for developing substantial employment uses at Burton Wold relied in part upon the opportunity to use locally generated renewable electricity.

The applicant's later descriptions of the energy infrastructure appear materially different from that original justification.

Under Regulation 18 and Schedule 4, the Environmental Statement must describe the reasonable alternatives studied by the developer that are relevant to the proposed development and identify the main reasons for selecting the chosen option, taking account of environmental effects.

CPRE recognises that this does not create an unrestricted obligation to assess every possible alternative location.

Nevertheless, NNC should establish whether the applicant's account of the alternatives studied remains accurate and whether the main reasons for selecting Burton Wold continue to be supported by the proposed development's actual energy arrangements.

If the locational justification has materially changed, the Council should explain how that affects the environmental assessment and planning balance.

5.4 The reasoned conclusion

Before granting permission, NNC must be able to reach the reasoned conclusion required by Regulation 26.

CPRE requests that the officer's report identifies the principal significant environmental effects, the mitigation relied upon, the evidence demonstrating its effectiveness and any residual effects remaining after mitigation.

Where the evidence necessary to reach that conclusion is incomplete, it should be obtained before determination rather than left to a future planning-condition process.

6. Transport assessment and reliance upon National Highways

CPRE is particularly concerned by information disclosed by National Highways in response to Environmental Information Regulations requests made by the local opposition campaign.

That material raises questions concerning the evidence upon which National Highways formed its consultation conclusions and upon which NNC may subsequently rely.

6.1 Missing Junction 11 swept-path drawing

The applicant's Transport Assessment refers to drawing DTA 22409-13 as evidence that maximum legally permitted articulated vehicles can negotiate Junction 11 of the A14.

National Highways confirmed in correspondence dated 21 September 2026 that this drawing had not been submitted.

The drawing was also absent from the publicly available planning application documents reviewed by objectors.

This is a specific evidential omission.

CPRE requests that NNC obtains the drawing and establishes whether it accurately demonstrates that the proposed vehicle movements can be accommodated safely.

If the drawing cannot be produced, NNC should identify what alternative validated evidence substantiates the relevant conclusion in the Transport Assessment.

6.2 Accuracy of the VISSIM model

The National Highways disclosure also identifies differences between the geometry represented within the VISSIM model and the physical highway layout.

Although National Highways considered that revising the model would not be proportionate, the implications of those differences must be understood.

NNC should establish whether the discrepancies could materially affect the model's performance and conclusions regarding the capacity and operation of Junction 11.

6.3 The 2031 and 2036 assessment horizons

NNC's EIA scoping requirements identified a 2036 assessment horizon.

The applicant's principal highway modelling and National Highways' review have concentrated on 2031.

The Council must explain whether this difference has been satisfactorily resolved and how the Environmental Statement addresses the relevant future-year and cumulative effects.

This is particularly important given the Transport Assessment's estimates of approximately 13,600 daily vehicle movements, including some 3,138 heavy and other goods vehicle movements.

The scope of National Highways' statutory responsibilities does not remove NNC's independent obligations under the EIA Regulations.

6.4 Cumulative impacts and highway safety

The Council should also establish whether the highway assessment adequately considers:

- Development-generated traffic beyond the A14 Junctions 7–11 corridor;
- Committed and reasonably foreseeable development;
- Junction capacity and the implications of high ratios of flow to capacity;
- HGV turning movements and access safety;

- The consequences for the A510 and surrounding local roads;
- The adequacy of sustainable transport infrastructure; and
- The concerns raised by Northamptonshire Fire and Rescue Service concerning emergency access.

CPRE does not suggest that the Council must automatically reject National Highways' conclusions.

Our concern is whether those conclusions can reasonably be relied upon where specific deficiencies in the underlying evidence have been identified and remain unexplained.

NNC must form its own judgement on the adequacy of the environmental and planning evidence.

7. Habitats Regulations and the Upper Nene Valley Gravel Pits SPA

This issue requires particular attention.

NNC's ecological advice dated 19 January 2026 identified land affected by the development as functionally linked land used by Golden Plover and Lapwing associated with the Upper Nene Valley Gravel Pits Special Protection Area.

The advice identified potentially significant adverse impacts and questioned the adequacy of the proposed compensation.

The developer subsequently advanced a mitigation proposal involving approximately 10 hectares of land north of the A14.

Material questions remain concerning the suitability and effectiveness of that land.

These include its proximity to the A14, adjoining industrial activities, existing rights of way, the proposed permissive route, bridleway GF17, vegetation management and the extent of disturbance likely to be experienced by the relevant bird species.

The mitigation proposals must also be assessed in the context of the surrounding land uses and their likely future development.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, where likely significant effects on a protected habitats site cannot be excluded, the competent authority must undertake an appropriate assessment of the implications for the site in view of its conservation objectives.

The assessment must consider relevant effects on functionally linked land insofar as those effects could undermine the conservation objectives of the protected site.

Unless the statutory derogation provisions apply, consent may only be granted after the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site.

That requirement cannot be replaced by an ordinary planning balance in which economic benefits are weighed against ecological harm.

CPRE has not identified a completed Habitats Regulations Assessment by NNC within the material previously made available for examination.

We therefore request that the Council confirms whether screening has been completed and whether an appropriate assessment is required or has been undertaken.

If an appropriate assessment has been undertaken, the relevant conclusions and supporting evidence should be identified and made available.

The Council should also explain how it has satisfied itself that any mitigation relied upon is effective, enforceable and available at the necessary time.

8. Ecological surveys, skylark compensation and biodiversity net gain

A number of ecological surveys relied upon by the applicant date from 2020–2022.

The age and scope of these surveys are relevant to the reliability of the baseline environmental assessment, particularly where substantial habitat loss is proposed.

CPRE requests that NNC's ecological advisers confirm which surveys remain reliable and which require updating before determination.

Particular attention should be given to breeding birds, bats, protected and notable species, and the ecological characteristics of the proposed northern mitigation parcel.

8.1 Skylarks

The application affects extensive agricultural land capable of supporting farmland birds, including Skylark.

The applicant's mitigation proposals have indicated that dedicated skylark compensation would not be provided.

This requires explanation against the evidence of habitat loss and the conservation status of Skylark as a Red-listed species and Species of Principal Importance.

In the nearby Nunnery Farm application, NNC's own ecologist identified the loss of approximately 12 skylark breeding territories and recommended an off-site compensation scheme with long-term management.

The circumstances are not identical, and CPRE does not suggest that the same mitigation prescription must automatically apply to both schemes.

However, the different approaches require a clear ecological justification.

NNC should explain how the expected effects upon Skylark at Kettering Energy Park have been assessed and why the proposed approach is considered sufficient.

8.2 Biodiversity baseline and metric

Local objectors have identified potential omissions and inconsistencies within the applicant's biodiversity baseline, including the treatment of mature trees, established hedgerows, habitat classifications and mapped features.

These include representations concerning approximately 2.27 kilometres of hedgerow and a number of mature trees which may not have been properly accounted for.

CPRE requests that NNC verifies the biodiversity baseline and confirms that the relevant habitat classifications, mapping and calculations are accurate and internally consistent.

We recognise that approval of a statutory Biodiversity Gain Plan may ordinarily follow the grant of planning permission.

However, where disputed baseline information is relevant to the EIA, protected-species assessments or Habitats Regulations assessment, that information must be sufficiently reliable to support the determination-stage findings.

The Council should distinguish between information which can legitimately be finalised through the statutory biodiversity gain process and information necessary to establish the environmental effects of the development itself.

9. Landscape character and visual effects

The development would introduce extensive industrial buildings and associated infrastructure into the elevated Burton Wold rural landscape.

The proposal would result in substantial and permanent changes to the character and experience of the countryside.

NNC's specialist landscape adviser, Place Services, identified deficiencies in the applicant's Landscape and Visual Impact Assessment, including the approach taken to assessing the application site itself as a landscape receptor.

CPRE requests that the Council explains how those matters have been resolved.

The assessment must distinguish between landscape character effects and visual effects experienced by individual receptors.

It must also consider the permanent transformation of the application site, impacts on public-rights-of-way users, dark skies, artificial lighting and cumulative landscape effects.

The fact that landscaping may reduce the visibility of buildings from some viewpoints does not mean that the underlying transformation of landscape character has been mitigated to the same degree.

Policy 26 expressly requires the landscape impacts of Energy Park development to be minimised and mitigated.

The Council must therefore explain how the proposal meets that requirement and identify the residual harm to which weight must be given.

10. Water, wastewater and other essential infrastructure

The scale and range of activities proposed at Kettering Energy Park raise substantial questions about infrastructure provision.

The applicant's proposed uses potentially have significantly different requirements for potable water, process water, wastewater disposal, electricity supply and emergency services.

CPRE requests that NNC establishes whether the application contains sufficiently robust assessments of:

1. Daily and peak water demand under the principal development scenarios;
2. Process-water requirements associated with advanced agriculture and industrial activities;
3. Foul and trade-effluent volumes and characteristics;
4. Water and wastewater network capacity;
5. The delivery of any necessary off-site infrastructure improvements;

6. Firefighting-water requirements, including those associated with potential battery energy storage;
7. Containment of contaminated firewater and potential effects on groundwater and surface waters; and
8. Emergency access and response arrangements.

The Council should distinguish between infrastructure that is already available, infrastructure for which there is a demonstrable and deliverable improvement scheme, and infrastructure that may be provided at an uncertain future date.

The recent Nunnery Farm committee report illustrates the importance of this distinction.

That report acknowledges Anglian Water's continuing objection and proposes that the outstanding wastewater arrangements could be secured through planning conditions.

The existence of that approach in another application does not demonstrate that it would necessarily be appropriate at Kettering Energy Park.

For KEP, the relevant question is whether sufficient evidence exists to establish that the development can be adequately served and that the likely significant environmental effects have been assessed.

JCS Policy 5 and the applicable national policies concerning infrastructure, water resources and pollution must be addressed expressly.

11. Public rights of way and the deliverability of mitigation

The proposed development would substantially alter the existing public-rights-of-way network and its rural setting.

The British Horse Society has raised concerns regarding the treatment of equestrian users and the safety and adequacy of replacement or diverted routes.

The proposed ecological mitigation land north of the A14 also raises questions about the compatibility of public access and habitat management.

The Council must establish whether any restrictions, diversions or changes to public rights of way required for ecological mitigation are legally achievable and capable of being secured.

The fact that separate statutory procedures exist for rights-of-way changes does not remove the need to establish the deliverability of mitigation relied upon when determining the planning application.

Where the effectiveness of an ecological measure depends upon controlling public access, its legal and practical deliverability must be demonstrated before that measure is relied upon in a statutory assessment.

12. The proper distinction between determination-stage evidence and planning conditions

CPRE recognises that planning conditions and obligations are essential and legitimate mechanisms for securing the acceptable implementation of development.

However, they cannot automatically resolve every outstanding planning or environmental question.

The August 2026 NPPF, including Policy DM6, provides the framework within which conditions must be necessary, relevant, precise, enforceable and reasonable.

A clear distinction must be maintained between:

Matters of implementation, where the acceptability of development has been established and detailed arrangements can properly be secured after permission; and

Matters of fundamental acceptability, where additional evidence is necessary to establish compliance with statutory requirements, determine the likely significant effects or demonstrate that essential mitigation is feasible and effective.

This distinction is especially relevant to the EIA and Habitats Regulations.

For each outstanding matter proposed to be resolved through a condition or obligation, CPRE requests that the Council explains:

- Why determination can lawfully proceed without the final details;
- What evidence establishes that an acceptable solution is achievable;
- How the required outcome will be secured;
- When the obligation or condition must be satisfied; and
- What would prevent the commencement or occupation of development if the necessary solution cannot be delivered.

The submission of a future strategy should not be treated as equivalent to demonstrating the effectiveness or feasibility of that strategy.

13. Economic benefits and the overall planning balance

CPRE recognises that national planning policy attaches substantial importance to sustainable economic growth and appropriately located development.

However, the claimed benefits of Kettering Energy Park must be assessed against the development actually proposed and the evidence supporting those claims.

The Council should distinguish between the established requirement for additional employment and logistics provision and the economic benefits reasonably attributable to this particular development.

It should consider the extent to which those benefits depend upon occupier assumptions, unconfirmed infrastructure, the availability of renewable electricity and the delivery of the wider Energy Park concept.

The planning balance must also identify the permanent and irreversible environmental consequences of the proposal, including the loss of countryside, changes to landscape character and effects upon biodiversity.

CPRE does not suggest that the presence of significant harm automatically requires refusal.

However, **harm cannot properly be weighed against benefits until the decision-maker has sufficient reliable information to establish its nature, magnitude and likely significance.**

Nor can the ordinary planning balance override independent statutory assessment requirements.

In particular, the Council must not treat an absence of sufficient evidence to demonstrate unacceptable harm as equivalent to positive evidence that the development will be acceptable.

14. Specific findings requested from NNC before determination

CPRE Northamptonshire requests that the eventual officer's report addresses the following twelve matters expressly, identifying the principal evidence and consultees' advice relied upon.

1. Development-plan compliance
Whether the proposal satisfies each applicable requirement of JCS Policy 26 and, where it does not, the precise nature and weight of the policy conflict.

2. Masterplan requirement
Whether a comprehensive masterplan has been formally agreed by the local planning authority and how the absence of such agreement affects compliance with Policy 26.

3. Decentralised energy network
Whether the proposed energy generation, distribution and consumption arrangements deliver the integrated energy objectives envisaged by Policy 26.

4. National planning policy and land uses
Whether the proposed mix of B8, B2, advanced agriculture and other activities has been correctly assessed under the August 2026 NPPF, including any reliance on strategic logistics demand.

5. Transport evidence
Whether the missing swept-path drawing DTA 22409-13, VISSIM geometry discrepancies, 2031/2036 assessment difference and relevant cumulative impacts have been satisfactorily addressed.

6. EIA compliance
Whether the Environmental Statement and supplementary information satisfy the applicable requirements of Regulations 18 and 25 and provide a sufficient basis for the Regulation 26 reasoned conclusion.

7. Habitats Regulations compliance
Whether the Council has completed the necessary screening and, where required, an appropriate assessment addressing the SPA and functionally linked land, supported by reliable evidence concerning mitigation effectiveness.

8. Ecology and biodiversity
Whether the ecological surveys remain adequate, the biodiversity baseline is reliable, and the effects upon protected and notable species, including Skylark, have been satisfactorily assessed.

9. Landscape character
Whether the permanent effects upon the Burton Wold landscape, including the application site itself, have been properly assessed and whether the landscape requirements of Policy 26 are satisfied.

10. Essential infrastructure
Whether adequate water supply, wastewater disposal, drainage, emergency access and firewater management can be provided without unacceptable environmental or operational consequences.

11. Conditions and obligations
Which outstanding matters can properly be resolved after permission and what evidence demonstrates that the proposed controls are sufficient and enforceable.

12. The planning balance
The weight afforded to the proposed economic and other benefits, identified environmental harms and any conflicts with the development plan, with clear reasons for the conclusions reached.

CPRE requests that these findings are supported by references to identifiable application documents and relevant consultee responses, rather than general statements that the issues have been considered.

15. Procedural requests

In view of the scale of the development and the outstanding matters identified, CPRE Northamptonshire requests that NNC:

1. Registers this document as a formal objection and pre-determination representation against NK/2025/0167.
2. Ensures that the relevant case officer, technical consultees and Head of Development Management are made aware of the matters raised.
3. Undertakes or obtains such further technical assessment as is necessary to establish compliance with the applicable statutory requirements.
4. Publishes any further environmental information and undertakes the consultation required by the EIA Regulations where those provisions apply.
5. Identifies the relevant Habitats Regulations Assessment findings and supporting evidence.
6. Ensures that the application is not recommended for approval until the information necessary to support a lawful and properly informed decision is available.
7. Provides an explicit assessment of the twelve findings requested above in the eventual committee report.
8. Makes this representation available to all members of the Planning Committee should the application be referred for determination.

Where NNC considers that an issue has already been resolved, is not material to the decision, or may properly be addressed after planning permission, CPRE requests that the reasons and supporting evidence are clearly identified.

16. Conclusion

Kettering Energy Park is a development of considerable scale and complexity, with potentially far-reaching implications for Northamptonshire's landscape, environment, transport infrastructure, energy systems and rural communities.

The adopted development plan provides a specific policy framework for an Energy Park at Burton Wold.

That framework envisages an integrated relationship between renewable energy generation, decentralised energy distribution, complementary employment development and the wider energy needs of North Northamptonshire.

The development now proposed raises substantial questions about whether that vision is being delivered.

At the same time, material concerns have been identified concerning the adequacy of the Environmental Statement, the reliability of highway modelling, the effects upon protected habitats, the treatment of ecological mitigation and the provision of essential infrastructure.

These matters cannot properly be resolved simply by assigning substantial weight to economic benefits.

The Council must first establish that the proposed development has been adequately described and assessed, that the relevant statutory duties have been fulfilled, and that the mitigation measures relied upon are sufficiently certain and deliverable.

CPRE Northamptonshire supports a plan-led planning system in which development proposals are assessed transparently, consistently and on the basis of sound evidence.

The central question is not simply whether the economic benefits of Kettering Energy Park might outweigh its environmental consequences. It is whether NNC possesses the evidence necessary to reach that judgement lawfully and with an adequate understanding of the development's effects.

We therefore maintain our objection to application NK/2025/0167.

We request that the Council does not recommend approval unless and until the matters identified in this representation have been satisfactorily assessed and the applicable statutory requirements have been met.

Should the Council subsequently recommend approval, CPRE requests that the officer's report provides a clear, evidence-based explanation of how the proposal can be justified against the adopted development plan, the August 2026 NPPF, the Environmental Impact Assessment Regulations and the Habitats Regulations.

We also request that this representation is retained on the public planning register and expressly taken into account in the determination of the application.

Yours faithfully,

A J Lynes
For and on behalf of CPRE Northamptonshire
Campaign to Protect Rural England – Northamptonshire Branch

Principal policy and statutory references

- North Northamptonshire Joint Core Strategy (2016), particularly Policies 3, 4, 5, 8, 15, 23, 24, 25 and 26.
- National Planning Policy Framework (August 2026), including Annex A and relevant decision-making policies.
- Planning and Compulsory Purchase Act 2004, Section 38(6).
- Town and Country Planning (Environmental Impact Assessment) Regulations 2017, particularly Regulations 18, 25 and 26 and Schedule 4.
- Conservation of Habitats and Species Regulations 2017, particularly Regulation 63.
- Natural Environment and Rural Communities Act 2006, Section 41.
- North Northamptonshire Council's EIA Scoping Opinion and subsequent Regulation 25 correspondence concerning NK/2025/0167.
- North Northamptonshire Council's correspondence dated 6 May 2025 concerning the Kettering Energy Park masterplan.
- NNC's ecological consultation response dated 19 January 2026.

- Place Services landscape consultation response dated 26 February 2026.
- National Highways correspondence dated 21 September 2026 and associated Environmental Information Regulations disclosures.
- North Northamptonshire Council Planning Policy response concerning Nunnery Farm, Rothwell, dated 8 September 2026.
- NNC Planning Committee report for application NK/2024/0717, published 29 October 2026.

The relevant published planning documents, consultee responses and supporting representations should be read alongside this submission.