



The countryside charity
Northamptonshire

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Mr John Cosgrove
North Northamptonshire Council
Development Management Services
Kettering Area
Municipal Offices
Bowling Green Road
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NN15 7QX

Via email: john.cosgrove@northnorthants.gov.uk

20th August 2025

Dear Mr Cosgrove

25/00712/FUL: Installation of a battery energy storage system, associated infrastructure, landscaping and access, Braybrooke

CPRE Northamptonshire lodges a formal objection to planning application 25/00712/FUL for a Battery Energy Storage System installation near Braybrooke. This objection is submitted under our remit to protect and promote the countryside for its intrinsic character, landscape value, biodiversity, and amenity.

Our assessment is based on the applicant's documents on the North Northamptonshire Planning Portal, reviewed against national policy in the National Planning Policy Framework (NPPF), the North Northamptonshire Joint Core Strategy (JCS), the Kettering Local Plan, and the Braybrooke Neighbourhood Plan.

We respectfully request that this application is refused for the following reasons:

1. Inappropriate development in open countryside and harm to landscape character

NPPF 187(a)-(b) requires policies and decisions to protect valued landscapes and to recognise "the intrinsic character and beauty of the countryside", including "the economic and other benefits of the best and most versatile agricultural land". The proposal industrialises an open countryside location and fails to conserve landscape character, conflicting with JCS 1, 3 and 25. (See also NPPF 131, 132 and 135 on design quality; especially 135(c) – being "sympathetic to ... landscape setting".

2. Loss of agricultural land (BMV)

BMV protection is addressed in NPPF 187(b) and footnote 65 (to para 188): where significant development of agricultural land is necessary, areas of poorer quality should be preferred to higher quality land. The application seeks planning for a defined period after which the site will be

restored to the original condition. The application should include the plan for the remediation of the site along with a guaranteed mechanism by which it will be funded at the end of the life of the scheme. No binding mechanism is offered to secure restoration and avoid permanent loss of BMV, contrary to JCS 13.

3. Transport and access

Safe and suitable access is governed by NPPF 115(b); proposals should ensure that any significant transport/highway safety impacts can be mitigated (115(d)). The proposed use of banksman to control highway traffic has not been approved by Northamptonshire highways. Layouts must allow service and emergency access (117(d)). The application lacks swept paths for emergency services and abnormal loads. The suitability of the Network Rail access bridge vertical alignment for Emergency and HGV traffic has not been demonstrated. The assessment of traffic that the development will generate during construction takes no account of the removal from site of topsoil ahead of placing the stone working platform.

4. Emergency planning, safety and Environmental Impact

The submission minimises and almost dismisses the possible risk and environmental impact of fire. Much is pending final decisions on the make and specification of the BESS units to be used on the scheme. Public perception is that this is a major risk and issue particularly from discharges to atmosphere and the potential for groundwater or watercourse pollution. Energy infrastructure must address adverse effects “appropriately (including cumulative landscape and visual impacts)” (NPPF 165(a)). The submission lacks a robust emergency plan proportionate to credible BESS risks (thermal runaway, contaminated firewater), and provides no containment strategy, contrary to these provisions and NFCC BESS guidance. The Environment Agency response would need to be considered and addressed in full. We believe that this would mean fundamental changes to the scheme design rendering this planning application invalid.

5. Surface water, SuDS and flood risk

Applications that could affect drainage on or around the site should incorporate sustainable drainage systems (NPPF 182). The proposed attenuation scheme and overland flow routing are unworkable with site topography. In addition, the scheme makes no allowance for the management of contaminated firewater.

6. Visual effects – inadequate assessment

The applicant has failed to demonstrate that the development will not present a visual blight on views in the vale. Five photographs of significant views are referenced, however only one is available. On the one picture there has been no attempt to image the development so it is impossible to draw any conclusions regarding the visual impact.

Conclusion

The proposal conflicts with multiple development plan policies and the NPPF. Under the presumption in favour of sustainable development (NPPF 11), permission should be refused where

“any adverse impacts... would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” (NPPF 11d(ii)). Given the significant harms to landscape character, BMV land, highway safety, flood risk management, amenity, and design quality, the adverse impacts clearly outweigh alleged benefits. The plan led approach therefore points to refusal.

Please record this objection and ensure CPRE Northamptonshire is consulted on all future applications or amendments relating to this site.

Yours sincerely,

Anthony Lynes

For and on behalf of CPRE Northamptonshire



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Annex – Corrected NPPF (December 2024) Citations Matrix

Topic	Precise NPPF (Dec 2024) reference	How it applies
Plan-led decision & balance	11 (presumption: 11d(ii)); 12 (status of development plan); 15–16 (plan-led system)	Sets the decision test and confirms primacy of the plan.
Landscape character & countryside	187(a)-(b)	Protect valued landscapes; recognise intrinsic character/beauty and BMV benefits.
Design/visual quality	135(c) (sympathetic to landscape setting); 139 (refuse not well-designed)	Poorly designed industrial form in open countryside should be refused.
Agricultural land (BMV)	187(b); fn.65 to para 188	Prefer lower quality land where significant development of agricultural land is necessary.
Transport and access	115(b), (d); 116; 117(d); 118	Safe/suitable access; only refuse for severe impacts; emergency/service access; TAs/TPs for significant movement.
Flood risk & SuDS	170–182; esp. 181(c) and 182	Avoid increasing flood risk; incorporate SuDS with LLFA input, standards and maintenance.
Climate resilience & energy infrastructure	161–164; 165(a); 166	Design-in adaptation/resilience; address adverse effects when planning energy infrastructure.

Noise, tranquillity & light	198(a) noise; 198(b) tranquillity; 198(c) light/dark skies	Mitigate noise to minimum; protect tranquil/dark landscapes; limit light pollution.
Biodiversity & habitats (where relevant)	193–195	Strong protection for SSSIs/irreplaceable habitats; disapples presumption where habitats sites are affected.



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Via email: john.cosgrove@northnorthants.gov.uk

19th September 2025

Dear Mr Cosgrove

25/00810/FUL: Installation of a Battery Energy Storage System (BESS), associated infrastructure, landscaping, and access

CPRE Northamptonshire lodges a formal objection to planning application 25/00810/FUL for a Battery Energy Storage System installation near Braybrooke. This objection is submitted under our remit to protect and promote the countryside for its intrinsic character, landscape value, biodiversity, and amenity.

Our assessment is based on the applicant's documents on the North Northamptonshire Planning Portal, reviewed against national policy in the National Planning Policy Framework (NPPF), the North Northamptonshire Joint Core Strategy (JCS), the Kettering Local Plan, and the Braybrooke Neighbourhood Plan.

We respectfully request that this application is refused for the following reasons:

1. Inappropriate development in open countryside and harm to landscape character

NPPF 187(a)-(b) requires policies and decisions to protect valued landscapes and to recognise "the intrinsic character and beauty of the countryside", including "the economic and other benefits of the best and most versatile agricultural land". The proposal industrialises an open countryside location and fails to conserve landscape character, conflicting with JCS 1, 3 and 25. (See also NPPF 131, 132 and 135 on design quality; especially 135(c) – being "sympathetic to ... landscape setting".

2. Loss of agricultural land (BMV)

BMV protection is addressed in NPPF 187(b) and footnote 65 (to para 188): where significant development of agricultural land is necessary, areas of poorer quality should be preferred to higher

quality land. The assessment of land quality is not consistent with, and downgrades, the findings on the immediately adjacent site for application 25/00712/FUL.

The application seeks planning for a defined period after which the site will be restored to its original condition. The application should include the plan for the remediation of the site along with a guaranteed mechanism by which it will be funded at the end of the life of the scheme. No binding mechanism is offered to secure restoration and avoid permanent loss of BMV, contrary to JCS 13.

3. Transport and access

Safe and suitable access is governed by NPPF 115(b); proposals should ensure that any significant transport/highway safety impacts can be mitigated (115(d)). Layouts must allow service and emergency access (117(d)). The application lacks swept paths for emergency services and abnormal loads. The assessment of traffic that the development will generate during construction takes no account of the removal from site of topsoil ahead of placing the stone working platform. Construction thicknesses used to generate import volumes are inadequate and final design will result in a considerable increase in vehicle movements.

4. Emergency planning, safety and Environmental Impact

The submission minimises and almost dismisses the possible risk and environmental impact of fire. Final decisions on the make and specification of the BESS units to be used on the scheme has not been made. Public perception is that this is a major risk and issue particularly from discharges to atmosphere and the potential for groundwater or watercourse pollution. Energy infrastructure must address adverse effects “appropriately (including cumulative landscape and visual impacts)” (NPPF 165(a)). The submission lacks an emergency plan proportionate to credible BESS risks (thermal runaway, contaminated firewater), and provides no containment strategy, contrary to these provisions and NFCC BESS guidance. We note that no Statutory Comment is recorded from the Environment Agency. Given the direct similarity to application 25/0712/FUL we would refer to the Agencies response that highlighted the total absence of any measures to contain and safely dispose of run-off during and following an incident. The applicant states that engagement with the Fire Service has not taken place contrary to the General Guidance on Siting and Design of BESS facilities set out by the NFCC and Environment Agency. We believe that completion of this would mean fundamental changes to the scheme design rendering this planning application invalid.

5. Surface water, SuDS and flood risk

Applications that could affect drainage on or around the site should incorporate sustainable drainage systems (NPPF 182). The proposed attenuation scheme and use of existing minor watercourses are unworkable with site plant layout and topography. In addition, the scheme makes no allowance for the management of contaminated firewater.

6. Visual effects – inadequate assessment

The applicant has failed to demonstrate that the development will not present a visual blight on views in the vale. Eight photographs of significant views are referenced, however there has been no attempt to image the development, so it is impossible to draw any conclusions regarding the visual impact. In particular the intention to erect a 4m high acoustic fence on the perimeter is considered an additional visual intrusion of inappropriate type in a rural landscape. A simple example of adding imagery to a view is appended to this response.

7. Sites of Historic and Environmental Significance

The Braybrooke Neighbourhood Plan, Policy ENV 8, specifically references medieval Ridge and Furrow agricultural land as non-designated heritage assets. The site area covers, and would destroy, a significant area of the remaining fields North of the railway.

Conclusion

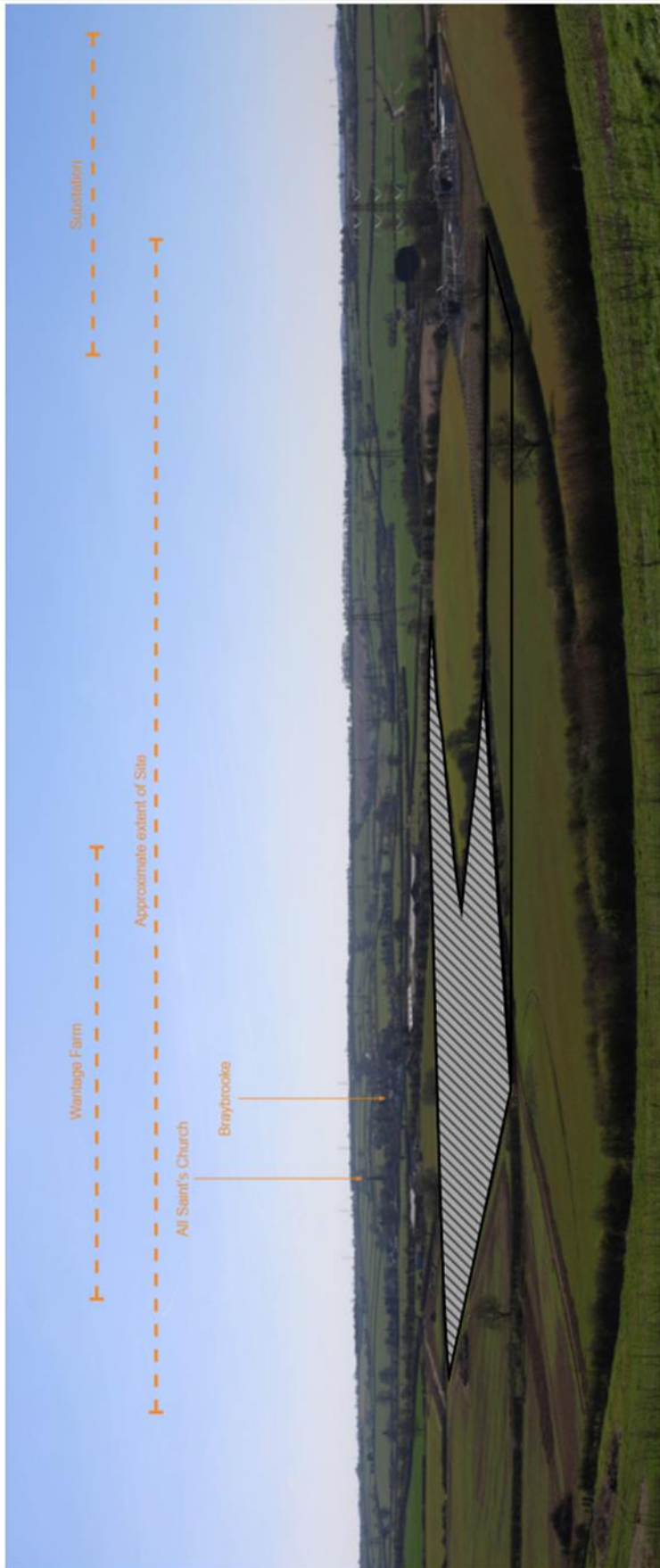
The proposal conflicts with multiple development plan policies and the NPPF. Under the presumption in favour of sustainable development (NPPF 11), permission should be refused where “any adverse impacts... would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” (NPPF 11d(ii)). Given the significant harms to landscape character, BMV land, highway safety, flood risk management, amenity, and design quality, the adverse impacts clearly outweigh alleged benefits. The plan led approach therefore points to refusal.

Please record this objection and ensure CPRE Northamptonshire is consulted on all future applications or amendments relating to this site.

Yours sincerely,

Anthony Lynes

For and on behalf of CPRE Northamptonshire



Site area shown on a photograph from the Visual Impact Assessment

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Via email: john.cosgrove@northnorthants.gov.uk

19th September 2025

Dear Mr Cosgrove

25/00818/FUL: Installation of a Battery Energy Storage System (BESS), associated infrastructure, landscaping, and access

CPRE Northamptonshire lodges a formal objection to planning application 25/00818/FUL for a Battery Energy Storage System installation near Braybrooke. This objection is submitted under our remit to protect and promote the countryside for its intrinsic character, landscape value, biodiversity, and amenity.

Our assessment is based on the applicant's documents on the North Northamptonshire Planning Portal, reviewed against national policy in the National Planning Policy Framework (NPPF), the North Northamptonshire Joint Core Strategy (JCS), the Kettering Local Plan, and the Braybrooke Neighbourhood Plan.

We respectfully request that this application is refused for the following reasons:

1. Inappropriate development in open countryside and harm to landscape character

NPPF 187(a)-(b) requires policies and decisions to protect valued landscapes and to recognise "the intrinsic character and beauty of the countryside", including "the economic and other benefits of the best and most versatile agricultural land". The proposal industrialises an open countryside location and fails to conserve landscape character, conflicting with JCS 1, 3 and 25. (See also NPPF 131, 132 and 135 on design quality; especially 135(c) – being "sympathetic to ... landscape setting".

2. Loss of agricultural land (BMV)

BMV protection is addressed in NPPF 187(b) and footnote 65 (to para 188): where significant development of agricultural land is necessary, areas of poorer quality should be preferred to higher quality land.

The application seeks planning for a defined period after which the site will be restored to its original condition. The scheme design involves significant earthworks and import of quarried materials. Returning the site to the existing condition would also be a significant operation. The application should include the plan for the remediation of the site along with a guaranteed mechanism by which it will be funded at the end of the life of the scheme. No binding mechanism is offered to secure restoration and avoid permanent loss of BMV, contrary to JCS 13.

3. Transport and access

Safe and suitable access is governed by NPPF 115(b); proposals should ensure that any significant transport/highway safety impacts can be mitigated (115(d)). The assessment of traffic that the development will generate contained in the Transport Statement does not align with the design set out in the remainder of the application.

No account is made of the removal of topsoil during the terracing operation to create the BESS and Substation platforms. The statement suggests that this could be used on site for landscaping, but the Illustrative Landscape drawing does not indicate this. Losing about 16,000m³ of topsoil on site would be difficult and would impact areas used to justify BNG figures.

Imported stone is used to form working terraces for plant installation. Suggested thickness appears inadequate and the tonnage used for vehicle movements is grossly underestimated. Hence vehicle movements calculated are also too low.

No allowance is made for foundation concrete deliveries.

Given the calculation errors in the vehicle movement assessment the impact on the A6 would need to be re-assessed and would be more significant.

4. Emergency planning, safety and Environmental Impact

The submission does address the critical issue of Battery Safety. The Plan is based on a particular type of battery storage unit but then states that this is not finalised and will not be until planning is awarded and detail design commences. As a result, all the measures set out will need to be re-addressed and submitted for approval by NNC planners and the Fire and Rescue Service. Energy infrastructure must address adverse effects “appropriately (including cumulative landscape and visual impacts)” (NPPF 165(a)). The emergency plan states that there will be measures to prevent contaminated run-off from entering the local drainage. The current design does not do this, and the Flood Risk Assessment makes no reference to any measures to affect containment. This omission is contrary to EA and NFCC BESS guidance.

We note that no Statutory Comment is recorded from the Environment Agency. Given the direct similarity to application 25/0712/FUL we would refer to the Agencies response that highlighted the measures to contain and safely dispose of run-off during and following an incident.

The applicant states that engagement with the Fire Service has not taken place contrary to the General Guidance on siting and design of BESS facilities set out by the NFCC and Environment Agency.

We believe that this would mean fundamental changes to the scheme drainage design that may render this planning application invalid.

5. Surface water, SuDS and flood risk

The Flood Risk Assessment sets out the strategy for reducing run-off by large scale use of SuDs provided by granular material with high voids. Achieving the 30% voids figure used in the assessment will require imported crushed rock (MOT Type3) rather than the 'gravel' mentioned. This will involve import, from out of the county, generating significant road traffic. Using this material to form the site roads is also questionable from a performance perspective. The system relies on major reprofiling of the site area to create almost level terraces for plant installation but would be effective.

As stated at 4 above, the proposed drainage scheme does not make any allowance for the management of contaminated firewater or run-off.

6. Visual effects – inadequate assessment

The applicant has failed to demonstrate that the development will not present a visual blight on views in the vale. Twelve photographs of significant views are referenced, however there has been no attempt to image the development on the views where it is visible, so it is difficult to draw any firm conclusions regarding the visual impact. The intention to erect a 4m high acoustic fence on part of the perimeter is considered an additional visual intrusion of inappropriate type in a rural landscape.

We accept that the ridge lines to the West of the site will hide the development from the North and West but remain concerned about views from the South over the Vale.

7. Planning, Design and Access Statement

The need for energy storage is not in question, but the location of BESS infrastructure is contentious. This proposal is located some 2.85Km from the nearest substation but no mention is made of the need to make that connection in the submission. Construction of this interconnector is a major undertaking. Granting planning permission to a scheme that may be unviable or impractical to connect and so utilise would be unwise.

Section 8.5 of the document sets out Benefits and assigns substantial weight to many of them. We would question most of these:

Increasing Storage of renewable energy: Location makes connection to the grid difficult and marginal from an energy loss perspective. The site is unlikely to collect locally generated energy and would rely on the grid to bring this from areas where surplus is generated.

Energy Security: the need is not in question however the location is not optimal.

Temporary and Reversible: No safeguard is proposed, other than a planning condition to ensure this is achieved. The remediation of the site would be a significant operation and cost.

Achieving BNG: As proposed this is a positive but to achieve it a large area of farmland is taken out of production. Ensuring that the gain is maintained over 40 years would need some safeguards.

Flood Risk: The scheme proposed would appear to improve the local run-off situation, but this achieved by major civil engineering works necessary only because of the scheme.

Construction Expenditure: It is stated but not made clear how any significant value of the construction cost would benefit the local economy, let alone Braybrooke itself. Most of the value of the scheme is bound up in imported materials, plant and equipment.

Direct Employment: this is a very limited benefit and highly dependent on contractor and subcontractor choice where no undertakings are given.

Financial investment in local area: Additional business rates are mentioned but it is hard to see what other local investment impact there will be. None is suggested.

Supporting Farm Diversification: Based on this assertion all farmlands would give a better financial return if removed from food production. This is in direct opposition to the drive for food security and national import reduction.

Conclusion

The proposal conflicts with multiple development plan policies and the NPPF. Under the presumption in favour of sustainable development (NPPF 11), permission should be refused where “any adverse impacts... would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” (NPPF 11d(ii)). Given the significant harms to landscape character, BMV land, highway capacity, management of water from emergency incidents, amenity, and design quality, the adverse impacts clearly outweigh alleged benefits. The plan led approach therefore points to refusal.

Please record this objection and ensure CPRE Northamptonshire is consulted on all future applications or amendments relating to this site.

Yours sincerely,

Anthony Lynes

**For and on behalf of CPRE
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