

# MEARS ASHBY PARISH COUNCIL

www.mearsashby.org.uk

Green Hil Solar Farm  
Unit 25.7 Coda Studios  
189 Munster Road  
London SW6 6AW

Date 12 December 2024

## **Reference: Green Hill Solar Farm Statutory Consultation Section 42 Planning Act 2008 and regulations 11 and 13 Infrastructure Planning (Environmental Impact Assessment) Regulations 2017**

I write on behalf of the parish council and in response to the above statutory consultation document dated 25 October 2024. The council having considered and debated this document at its meetings held on the 25 November 2024 and the 9 December 2024, would seek that the following serious concerns with the scheme are addressed:

### **1. The proposed scheme fails to consider priorities set out in the North Northamptonshire Corporate Plan 2022.**

Item 4. **Green Sustainable Environment:** To protect the countryside and open spaces. And enhance the natural environment and ecology.

- This massive 3,000-acre development, the size and scale of Heathrow Airport, being built in the middle of rural Northamptonshire, surrounding ten rural villages, will not only fail to protect but will considerably and adversely change the countryside amid some of the best wheat growing land in the country.

Item 5. **Connected Communities:** To listen to our communities, giving them a greater say in their future.

- The council is aware of the many expressions of concern from residents within the community. None the least of these being, bridleways and footpaths that will be changed forever. Corridors between solar panels with high fencing on each side, and security cameras, will create hostile environments which will constrain wildlife in all directions and likely to result in the loss of wildlife habitats for badgers, foxes, deer, and various bird species.
- It will create no-go areas for dog walkers, hikers, and horse riders. Views will be impeded and do nothing for people's well-being by adversely affecting beautiful open countryside.
- There will be no opportunities for local employment as all work is specialised.

**The Natural and Historic Environment:** Including the protection, restoration, and enhancement of natural, and historic assets. Provide appropriate measures to protect locally designated sites and priority habitats for protected species. To maximise the health and wellbeing benefits of nature and accessibility to it. Provision of a spatial strategy and place-making approach influenced by the importance of the natural and historic environment and the role they play in creating local distinctiveness.

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- The Solar Farm will have a massive negative impact on the local Mears Ashby Conservation Area. – 90% of the village is within this area and has 28 listed buildings. The scale and location of the proposal will effectively industrialise the area. Changing it irrevocably from open countryside and prime agricultural land.
- Mears Ashby is a place of special character and historic interest in a unique setting within rural Northamptonshire, in extensive tracts of unspoilt open land contained within the central valley of the conservation area and its surrounds of rural farmland. This cultural heritage will be lost.
- The council is concerned that no archaeological surveys have been mentioned. The ‘Northamptonshire Historic Gateway’ shows 140 results for Mears Ashby and its surrounds. This comprises, Archaeology, Historic buildings and Historic landscapes, which date back to Roman times. The most significant finds are within Area D being the largest area of proposed solar panels.

**The Landscape Character:** Influenced by a combination of human and physical influences, which makes the area distinctive and needs to be conserved. To recognise the importance of views and vistas. The Landscape Character Assessment 2008 for the county is still relevant today. Visual impacts, concern the degree proposed development will become an adverse feature in particular views and the impacts that this has on people experiencing views.

**The Historic Environment:** Being one of Northamptonshire’s most valued assets. Responding appropriately to the historic environment being a key principle of good place making. These heritage assets include any site, place, area of landscaping identified as significantly meriting consideration in planning decisions.

**Below Ground Archaeology.** These assets are an irreplaceable resource that need to be conserved so that they can be enjoyed for their contribution to the life of existing and future generations.

I refer you to **appendix A** of this document being extracted from the Corporate Plan and further explaining these concerns.

**2. The scheme design has not considered any alternative locations.**

Area C surrounds Wood Lodge Farm. Area D will completely ruin the longest and most widely used footpath in Mears Ashby and stifle an important wildlife corridor.

Area E contains a huge amount of important archaeological remains in the fields to the East of Mears Ashby (closest to the village). These fields should be left undisturbed and outside the scheme boundary.

**3. Access points are located on ‘non-HGV’ roads.**

At points where disruption for local and through traffic will be considerable. A number of these access roads, in part, have no proper footpaths or cycleways thereby placing pedestrians, cyclists, and those with mobility issues at increased risk of accident or injury. The parish council is particularly concerned for the safety of the children and their parents at the village school.

- Mears Ashby has ‘No HGV’ routes through the village or close to the village. The village is already a ‘rat run’ for commuters and has congestion daily at and near to the school at drop off and pick up times. HGV delivery drivers will be likely to drive through the village, with the knowledge they cannot be forced to turn back. Local equestrian businesses regularly exercise horses through throughout the area and the village.

- Wilby Road has bad bends and reduced widths with soft verges, not suitable for large and increased traffic.
- 4. Local businesses will be severely disrupted.**
- By deliveries and construction traffic close to the access points and all local traffic will be severely affected. Again, increasing risk of accident or injury to both pedestrians and other road users.
- Construction is proposed to be on-going for two years. Excavators, cranes, lorries, earth moving machinery will cause continuous noise, vibration, dust and mud on roads which will adversely affect local businesses, particularly equestrian, residents, visitors and travellers.
  - Local businesses will suffer as visitors to the area will be turned away by traffic problems, road closures, noise and delays. Access to Sywell Airport, Beckworth Emporium, local garden centres, The Griffin Head and Sywell Country Park will be adversely affected.
- 5. There has been no consideration to local flooding in Wellingborough Road.**
- Mitigations have been documented as 'raising the height of the panels' which the council does not accept as being in anyway sufficient in addressing this concern.
- 6. The location of the 400kv substation close to Wood Lodge Farm is unacceptable.**
- An alternative location, closer to the fields at the back of Park Farm must be considered.
- BESS-Electromagnetic Fields & Fire risks are well documented. Liable to catch fire requiring colossal amounts of water to extinguish Please see Appendix B (1).  
Consequential contaminated run-off to local water courses. Such a development being 1500 acres of industrial scale solar installations with a BESS & 400 KV substation is inappropriate on fields adjacent to Mears Ashby and its heritage assets.

The parish council has given consideration and taken advice on the Preliminary Environmental Report in support of your application for the Development Consent Order and has concerns with the following sections:

**2. Agricultural Land Classification**

- A review of the ALC maps produced by DEFRA for the East Midland region indicates the bulk of the development is on land considered very good (class 2) and good (class 3) agricultural land and substantially exceeds your estimate of 66%.

**3. Lifetime of the development**

- You advise that the lifetime of the development will be 60 years. This equates to in excess of three generations, affecting local children and grandchildren. The council is therefore most concerned to ensure that the right decision is made on this development proposal.

**4. UK Legislation – Planning Issues**

- The parish council is aware that there is a significant consensus in planning policies that proposed development should be directed towards poorer quality land. The parish council is most concerned that in your documents produced no alternatives have been considered.

**5. Food Production within the proposed development**

- The bulk of the fields for the proposed development site are arable and grow wheat and barley cereals.

## 6. UK Food Security

- A review of the UK food security index states the UK produces most of the cereals, meat, dairy, and eggs that it consumes. Cereals production is susceptible to yearly change in weather. Due to wet weather 2024 harvest for wheat is forecast to reduce. The medium- and long-term expectation is that demand and production of arable crops will increase due to population growth. The parish council is concerned that whilst the UK is currently considered self-sufficient in cereal production, increase in demand over the next 60 years, being the advised lifetime of the proposed solar farm development, is likely to substantially reduce the UK ability to meet the required production levels. It is therefore the opinion of the parish council that it is necessary to maintain our agricultural land resources in order not to reduce the production of cereal crops for future generations.

## 7. Duty of Care

- Green Hill Solar Farm and their investors, the land owners associated with the proposals, the Secretary of State and his advisers employed in the planning system, NNC Unitary Council, This Parish Council, and all local residents, all have a duty of care to future generations including their children, grandchildren and great grandchildren to ensure development proposals are in their best interests.

## 8. Alternative Sites

- The parish council, whilst recognising the current farm proposals has a reasonably good connectivity to the Grendon substation, being located 14km south of the proposed site, near the village of Old, the parish council argues that this proposed site is not conveniently located, and an alternative must be considered.
- The parish council has been made aware of other numerous points of connection. Northamptonshire and some of the surrounding counties were subject to large opencast extractions. Many remain undeveloped and cannot be classified as prime agricultural land. For example, the London Road Solar Farm, near Irchester has been built over a restored opencast ironstone quarry.

## **Transport and Access. Chapter 13 Environmental Impact Assessment Scoping Report.**

The Council has previously raised its concerns by way of its response to the Scoping Consultation as detailed in Appendix B and would seek that these are taken into account.

- The council has concerns regarding the identification of “local routes” to reach Green Hill sites C, D and E from identified SRN and MRN routes. (Paragraph 13.3). Page 222.
- At paragraph 13.3.8 Highfield Road is identified as a suitable local route to access Green Hill site D notwithstanding that this route is described in the report as, “a single lane rural road with limited passing places”.

- Highfield Road is unsuitable for HGV's and large vehicles with no room to manoeuvre and no passing or turning places. The road has crumbling soft verge and road surface. It is not designed to carry anything other than local traffic.
- At paragraph 13.3.9 Wilby Road is identified as bisecting Green Hill site E, "and can be used to access Green Hill site E and the A509". Our comments with regards to the suitability of Highfield Road apply equally to Wilby Road. Additionally, Wilby Road has an acute left right bend in a dip which limits visibility and makes it unsuitable for use by HGV's. Such usage would pose a significant risk to other road users.
- At paragraph 13.3.9 Mears Ashby Road is identified as providing access to Green Hill site E. This road is a major commuter route between the A45 and A43 and has two blind bends at the summit of high ground limiting visibility for road users. The road also has significant agricultural, cycling and pedestrian traffic.
- The identified "local routes" would not allow large vehicles to turn to leave by the same route potentially forcing traffic into the village of Mears Ashby and Sywell.
- At paragraph 13.1(page 222) Fig 1 identifies the local road network lined in black. This includes Highfield Road, Wilby Road and Mears Ashby/Earls Barton Road entering the village of Mears Ashby and being linked by Wilby Road on the Southern boundary of the village and Wellingborough Road on the eastern boundary of the village.
- Wilby Road and Wellingborough Road are within the curtilage of the village and are subject to weight restrictions. Access is limited due to road width, on street parking and tight bends. They are unsuitable for use by HGV's.
- The village should not be used as a "rat run" for construction traffic as this would pose a significant danger to residents and their property.

## SUMMARY

The parish council would be unable to support this proposed scheme in its current form, for the many reasons and concerns expressed herein. Concerns that are equally shared with our residents and business operators, along with those equal concerns from other parish councils and their residents and business operators alike. The parish council therefore seeks that these concerns are fully considered and addressed.

Whilst it is likely that the majority of UK residents favour renewable sources of energy including solar farms, it is also likely that the majority will consider energy security of prime importance. It is, however, equally important and most likely, that UK residents will equally share the concerns of our local residents in seeking to maintain and preserve our agricultural lands. Lands which produce cereals, to ensure that the UK is able to meet the increased needs and demands resulting from climate change, increases in population, GDP growth with demand in animal feeds. Increased demands which apply throughout and beyond the sixty-year lifespan of this project.

The parish council is of the opinion that there are better alternative sites to the current proposals in the eastern UK which can accommodate solar farms on land which is not good agricultural land for food production. This being a priority requirement of the UK planning policies.

## Community Benefits

The parish council is mindful of the following community benefits that you refer to in your consultation document.

*Island Green Power provides a community benefits package with all the renewable energy schemes it promotes, with the potential for both on-site and off-site initiatives. We believe the communities closest to the proposed development should benefit and are best placed to recommend what they believe a 'community benefit' should be. Through our ongoing engagement with the community, we want to understand what local initiatives or projects could be supported. These could include:*

- on-site benefits which focus on improvements directly related to the project location, such as habitat creation.*
- off-site benefits which involve broader community support, including funding local charities or educational programmes.*

*Community benefits can be immediate, offering short-term advantages, or could be longer-lasting, with investments spread over a period of time to ensure continued positive impact and support. We invite your views on how such benefits could be made available through our Scheme, and how a benefit fund could be administered and managed. We also continue to welcome any further suggestions for local schemes and initiatives that we could support. A community benefit fund would only operate if the Scheme received development consent.*

### Should this development be granted consent:

- The parish council would be most concerned to ensure that the planning inspectorate, if granting approval of the proposed scheme, it would be strictly on the basis that finances and resources are a compulsory requirement to mitigate the loss of the countryside and to protect residents and road users from the adverse traffic impacts.
- The parish council would seek that connected, proper footpaths, and cycleways along the sites access roads, are installed and maintained with developed connections from the village of Mears Ashby to the North Northamptonshire Greenway, being a strategic rural network of safer, largely traffic-free routes suitable for walkers, wheelers, cyclists and equestrian users where appropriate, connecting settlements, employment, leisure and tourism destinations across North Northamptonshire and beyond.
- The parish council would seek that a piece of land from the development be set-aside as a Suitable Alternative Natural Green Space (SANG), close to the village with safe and easy walking distance for residents, that could be developed as an eco-friendly pocket park/play area.
- The parish council would further seek that measures to mitigate should include Noise Barriers and other forms of landscaping including bunding and planting of natural hedgerows and trees to negate the development impact on the views and vistas from both within the village and from surrounding roads.

Yours sincerely



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## **North Northamptonshire Corporate Plan 2022**

### **Priorities**

#### **Item 4 – Green Sustainable Environment**

Protect the countryside and open spaces, and enhance the natural environment and ecology

#### **Item 5 – Connected communities:**

- Inform and listen to our communities, giving them a greater say in their future
- Respect and engage our local diverse communities and town and parish councils
- Empower a thriving voluntary and community sector

#### **Natural and Historic Environment**

- including the protection, restoration, and enhancement of natural, and historic assets
- appropriate measures for internationally, nationally and locally designated sites and priority habitats or protected species
- The Strategic Plan will seek to maximise the health and wellbeing benefits of nature and accessibility to it.
- The spatial strategy and place-making approach will be influenced by the importance of the natural and historic environment including the role they play in creating local distinctiveness.

#### **Landscape Character**

The landscape in North Northamptonshire has been influenced by a combination of human and physical influences. These landscapes, both man-made and natural, are what makes the area distinctive and there is a pressing need to conserve and enhance many of the features of importance landscape settings, as well as recognising the importance of views and vistas of these. A Landscape Character Assessment which was undertaken in 2008 for the county and informed the JCS is still relevant.

Visual impacts concern the degree to which proposed development will become a feature in particular views (or sequences of views) and the impacts this has on people experiencing views.

## **Historic Environment**

The historic environment is one of North Northamptonshire's most valued assets. It is an important element of the landscape and contributes to the individual character and appearance of settlements. Responding appropriately to the historic environment is a key principle of good place making. Elements of the historic environment that hold significance are termed 'heritage assets' and include any building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. This includes

below ground archaeology. These assets are an irreplaceable resource that need to be conserved so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Known heritage assets can be designated or non-designated. There are also new sites being discovered all the time. North Northamptonshire has over 2800 designated heritage assets spread across its rural and urban landscapes. Designated heritage assets within North Northamptonshire include scheduled monuments, listed buildings, registered parks and gardens, and conservation areas.

The Strategic Plan will set a policy framework to ensure the significance of heritage assets is appropriately considered through the development management process and that there is appropriate preservation of assets either in situ or by investigation and recording where appropriate.

We also recognise the importance of accessible, good quality natural environments to encourage community cohesion, activity and healthy living. Natural Capital is *'the sum of our ecosystems, species, freshwater, land soils, minerals, our air and our seas. These are all elements of nature that either directly or indirectly bring value to people and the country at large. They do this in many ways but chiefly by providing us with food, clean air and water, wildlife, energy, wood, recreation and protection from hazards'*.

There is also a target to double the area of land managed primarily for nature and to increase tree and woodland cover across the Arc from 7.4% to 19%. There are considerable opportunities to engage with the desire to double nature, increase tree planting and increase biodiversity gain within North Northamptonshire

Development could potentially pose threats to the SPA through increased disturbance through human activity, loss of supporting habitat or changes in ecological condition. The plan will need to ensure that the SPA is suitably protected and where possible enhanced.

**Access to natural environments provides important health and wellbeing benefits, which we will want to maximise in the Strategic Plan. It will therefore be important to ensure that the plan ensures that high quality natural spaces are provided in locations which are accessible and that we seek to improve the equality of sustainable access to nature and its benefits across the whole area. This will mean ensuring accessible natural spaces are provided within existing settlements and as part of new developments as well providing access to natural areas within the wider countryside. The pandemic has highlighted the importance of access to local greenspace for physical and mental health and to encourage social activity.**

## **Appendix B – Response to Scoping Consultaion**

The Council has some concerns regarding the scoping document for Greenhill Solar Farm, areas C, D, and E.

Particularly the following items that have been scoped out:

22.1.1 - it is proposed to scope out of the environmental statement 'Major accidents and Disasters'. The Parish Council consider that the following proposes significant risk and should be scoped in.

### **1. BESS.**

The recent amendment is that 'Battery Energy Storage Systems' are to be considered in areas 'C' Wood Lodge Farm, and 'E' the central Mears Ashby area of 550 acres.

Battery Storage Systems are notoriously unsafe, liable to catch fire and require hundreds of gallons of water to extinguish. Run-off from such a fire contains significant amounts of pollutants and can contaminate watercourses. Both areas are close to water courses that eventually run into Sywell reservoir at the Country Park.

Water pressure throughout the parish is 'Low' and often unreliable due to antiquated, inefficient water tower and associated pipework. There have been occasions throughout recent times when the village has suffered a number of water supply outages due to the inadequate infrastructure. Full consideration must be given to the local services ability to effectively deal with these potential accidents or disasters.

### **2. Aviation Incidents.**

Given the proximity of Sywell airfield to the 850 acres of solar panels proposed around Mears Ashby, particularly Wood Lodge Farm, which sits at the end of the runway, there is clearly a significant risk of 'glint and glare' to all aircraft within the ATZ (Air traffic Zone of Safety) This zone extends vertically to 2000ft and has a 2km radius. This zone is under absolute control of the tower, and nothing is allowed to impinge on the safe operation of 'landing and 'taking off'.

### **3. Table 24.1**

Horse Facilities.

Adjacent to Area 'D' is the Equestrian Centre for the sole use of The Hannah Payne Riding for the Disabled Group., Charity No 1119963. patron HRH The Princess Royal.

This provides unique and important horse-riding therapy for 3- to 16-year-old children.

The Centre, of stables and fields, join up to and are totally overlooked by the first field in Area D. This proposed field has a significant slope bearing down on the field and stables. Horses are notoriously easy to frighten and are animals of flight. The invasion of machinery and noise would put a stop to any riding activity and glint and glare from the panels, once in place, would also spook the horses and their riders.

### **4. Glint and Glare, only visual receptors scoped in between 1-2km**

The owners of the stables and fields have their own property, within the same area as the stables and are approximately 100m from the edge of Area D. The Environmental Impact Assessment report 15.4.27 states the applied distance should be 1km. Glint and glare from the panels on the down slope of Area D, will have a massive impact on the owners. Visual receptors should be scoped in from 0 - 2km.

### **Transport and Access. Chapter 13 Environmental Impact Assessment Scoping Report.**

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Wilby Road and Wellingborough Road are within the curtilage of the village and are subject to weight restrictions. Access is limited due to road width, on street parking and tight bends. They are unsuitable for use by HGV’s.

The village should not be used as a “rat run” for construction or maintenance traffic as this would pose a significant danger to residents and their property. This would also be a significant increase in the risk of accident around the primary school area. Linking Highfield Road to the other major artery, Earls Barton Road via North Street, along which numerous young children make their way to and from school each day.

The parish council would express its concerns with the overall project and in particular:

1. That there is no analysis of the full cradle to grave impact over the 40-year life cycle of the solar farm.
2. The revenues from the solar farm belong to an organisation that is not based in the UK.
3. Sustainability is not the same as energy security. Whilst the solar farm might create sustainable energy, there is no guarantee that the energy is secure for the duration of the planned life of the solar farm as the offshore legal entity might decide not to sell the energy to the UK grid.