



## **GREEN HILL SOLAR FARM – LAVENDON PARISH COUNCIL REPRESENTATION - NOVEMBER 2025**

### **CONTEXT**

Since the proposals relating to the Green Hill Solar Farm NSIP were made public, Lavendon Parish Council (the ‘Council’) has followed developments closely and has engaged actively in reviewing the documentation concerning ‘Site G’. From the outset, the Council’s position has been to engage constructively with Island Green Power (the ‘Developer’), sharing local knowledge on several key matters and conveying the community’s concerns, with the aim of influencing the design process to achieve outcomes beneficial to both the local community and the natural environment.

The Council submitted a formal response to the public consultation in December 2024. This response sought clarification on specific aspects of the proposals’ design, outlined the wider concerns of the local community (principally relating to visual, ecological and flood risk impacts) and requested the removal of two fields from the scheme, identified as ‘GF9’ and ‘GF13’.

In August 2025, the Council submitted its first ‘relevant representation’ via the dedicated Planning Inspectorate (PINS) portal, reiterating the points raised during the earlier consultation. At that stage, the Developer had not provided substantive responses to the matters raised.

To seek further clarity and provide parishioners with an informed update, a meeting between two Council representatives and the Developer was held on 24 September 2025. The meeting was attended by representatives of the Developer and by consultants from several technical disciplines who had contributed to the suite of assessments supporting the Development Consent Order (DCO) application, including visual impact, flood risk and ecology.

During the meeting, the Council representatives sought an update on the request for the removal of fields GF9 and GF13 from the scheme. The Developer advised that this would not be possible, citing the project’s designation as Critical National Priority (CNP) infrastructure necessary to meet the UK’s urgent energy objectives. Quoting from an official statement: *‘Removing land parcels from the Scheme will reduce the expected annual generation of the Scheme. Although the carbon reduction, energy security and affordability benefits associated with the Scheme would remain significant, they would not be as large as they would be if delivered with land parcels removed’*.

### **THE COUNCIL’S CURRENT POSITION**

As stated in its first representation, the Council does not oppose renewable energy development and recognises the national and international imperative to expand resilient domestic energy production and decarbonise electricity generation in order to contribute to global efforts to limit temperature rise to 1.5°C above pre-industrial levels. Accordingly, the Council has adopted a constructive approach to the proposed development, seeking to influence the design through reasoned dialogue and informed feedback.

Having considered the response provided by the Developer during and following the meeting held in September 2025, the Council is disappointed by the lack of concessions or design amendments and maintains its view that fields GF9 and GF13 should be removed from the scheme. Their exclusion would materially reduce ecological, flood, and visual impacts associated with the proposed development. The key considerations underpinning this position are outlined below.



Field GF9 lies immediately adjacent to designated ancient woodland (Three Shires Wood). The proposed access track providing entry to this parcel would run within approximately 10 metres of the woodland edge. Given the typical methods employed in the construction of haul roads within solar farm developments, the potential for adverse effects on adjoining woodland habitats such as soil compaction, disturbance to root systems, and alteration of hydrological conditions would be difficult to avoid. The Council therefore considers that the risk to the ecological integrity of Three Shires Wood remains significant and insufficiently mitigated.

Field GF13 is situated closest to the settlement boundary and adjoins an ordinary watercourse along its northern edge. Lavendon has a well-documented history of flood incidents, and the local community has expressed legitimate concerns that the proposed development could exacerbate existing flood risk. This risk arises from the introduction of impervious surfaces associated with the photovoltaic (PV) arrays and ancillary infrastructure in close proximity to both the watercourse and residential properties. The Flood Risk Assessment and Drainage Strategy submitted by the Developer does not include a Sustainable Drainage System (SuDS) strategy, relying instead on the assumption that the reversion of arable land to grassland will improve infiltration rates and offset the increased runoff generated by the development. The Council does not consider this approach sufficiently robust to address localised flood concerns.

Furthermore, the visual impacts associated with the inclusion of fields GF9 and GF13 have, in the Council's professional view, been underestimated. The Council notes that the formal request made by Milton Keynes City Council (MKCC) for the removal of these parcels on landscape and visual grounds has been rejected by the Developer, without satisfactory justification.

#### LAND AVAILABILITY VS TARGET OUTPUT

The overall target output for the Green Hill Solar Farm NSIP is 500 MW. It is understood that, employing current photovoltaic technologies, approximately four acres of land are required to deliver one megawatt (MW) of generating capacity. The total area covered by the proposed development is approximately 1,200 hectares (ha), of which 168 ha are attributed to the cable route alone. Consequently, the area allocated to the solar farm sites themselves is estimated to be in the region of 1,030 ha.

On the basis of the 4 acres : 1 MW ratio, an area of approximately 800 ha should be sufficient to deliver the target output of 500 MW. This implies a residual surplus of roughly 230 ha. While it is recognised that part of this additional area will accommodate essential supporting infrastructure such as access tracks, compounds, substations, and electrical equipment, it is noted that the photovoltaic (PV) areas relating specifically to parcels GF9 and GF13 cover 4.3 ha and 12 ha respectively.

Given this context, it appears unlikely that the exclusion of these two parcels, with a combined reduction of 16.3 ha, would materially affect the scheme's overall generating capacity. The Council therefore questions the validity of the Developer's assertion that the removal of these fields would significantly compromise the scheme's delivery objectives.



### THE COUNCIL'S REQUESTS

The Council's principal requests remain consistent with those previously set out in its consultation response and subsequent relevant representation. They are summarised below:

- The Council considers the submitted Flood Risk Assessment (FRA) and associated mitigation strategy to be inadequate, as both rely extensively on assumptions and on low-resolution datasets that are unsuitable for a site-specific evaluation. Given Lavendon's recent and well-documented history of flooding—the most recent incident having occurred in September 2024—a detailed reassessment of local hydrological conditions, run-off dynamics, and proposed mitigation measures is warranted. This position is further substantiated by the findings of an independent technical review of the Developer's flood mitigation strategy, undertaken by resident hydrologist Mark Shepherd CEng PrEng (*Engineering Report: Assessment of Surface Water Runoff from Proposed Green Hill Solar Farm (Green Hill G). October 2025*). The review identifies a series of methodological inconsistencies and flawed assumptions that call into question the robustness of the FRA and its conclusions
- Removal of PV arrays from field GF13, to allow this parcel to be repurposed for the delivery of multifunctional flood attenuation and ecological mitigation measures. Specifically, The Council recommends that this area be instead utilised for biodiversity enhancement, for example through the creation of skylark plots and other open-habitat features to offset the loss of foraging habitat arising from the installation of PV infrastructure elsewhere within the site.
- Removal of field GF9 from the scheme, to be similarly repurposed for ecological mitigation and enhancement. This would help maintain habitat connectivity with the adjacent ancient woodland (Three Shires Wood) and contribute to the overall biodiversity net gain and landscape mitigation objectives of the scheme.
- Enhanced landscaping along the boundary with Three Shire Way, achieved through increased tree planting density within the proposed new hedgerow (currently described as comprising 'irregularly spaced trees'). This measure would serve to reduce the visual impact of the solar farm from this well-used route and to further enhance the structural diversity and ecological function of boundary habitats.

These proposals are broadly aligned with the recommendations set out within Milton Keynes City Council's Local Impact Report and, on that basis, should be afforded full and proper consideration by the Examining Authority. In view of the widespread concerns expressed by residents of Lavendon regarding the matters outlined in this representation, the Parish Council respectfully requests that these issues be examined in detail and discussed during an Open Floor Hearing. This would provide an appropriate forum for local representatives and parishioners to articulate their views directly and to ensure that community perspectives are meaningfully reflected within the examination process.