Grendon Parish Council – Objection Summary

Green Hill Solar Farm (EN010170)

Objection: Proximity to European Wetlands and Associated Impacts

We (Grendon Parish Council) objects to the proposed Green Hill Solar Farm due to its **very close proximity (approximately 0.01 km / 10 metres)** to the **Upper Nene Valley Gravel Pits Special Protection Area (SPA)** and the **Upper Nene Valley Ramsar site**. These sites are internationally protected wetlands of the highest ecological importance. We are concerned that the proposed Solar Farm, BESS and associated infrastructure development is located too close to these sites and would inevitably place them at risk.

The Examining Authority's *Report on the Implications for European Sites (RIES)* identifies a number of negative impacts which it concludes cannot be ruled out at this stage. Several of these remain unresolved and, our view, give rise to serious concern.

Main Areas of Concern

1. Location immediately next to protected wetlands
The proposed solar farm and associated infrastructure are located directly adjacent to the SPA and Ramsar site. At a distance of around 10 metres, the Council considers that there is no meaningful separation between the development and the protected wetlands. Any changes to drainage, land management, or activity levels therefore have the potential to affect the integrity of these sites.

2. Likely significant effects identified
The RIES confirms that probable significant effects have been identified in relation to a number of areas, including:

- disturbance to qualifying bird species during construction and operation;
- habitat fragmentation and loss of functionally linked land;
- airborne and waterborne pollution;
- surface water runoff; and
- the spread of invasive non-native species.

These effects apply to both the SPA and the Ramsar site and, in several cases, are still subject to disagreement between the applicant, Natural England and other interested parties.

3. Flood risk and waterborne pollution
The Council is particularly concerned about the risk of polluted surface water entering the wetland system. The site lies within a floodplain, and there are ongoing concerns about whether proposed drainage and pollution control measures would operate effectively during flood events. The presence of the Battery Energy Storage Systems (BESS) increases this concern, particularly in the event of a fire where contaminated firewater could reach watercourses connected to the wetlands.

4. Floodplain location increases vulnerability
Both the wetlands and the proposed development sit within the same floodplain system. Our local experience shows that flooding is not uncommon in this area. These flood conditions increase the risk that control measures do not work or are overtopped, allowing sediment or pollutants to be carried towards the SPA and Ramsar site.

5. Impacts on birds and supporting land
The RIES raises concerns about the adequacy of bird surveys, the identification of land used by qualifying species outside the SPA, and the timing of proposed mitigation. In particular, it remains unclear whether a suitable replacement habitat would be available before any loss or disturbance occurs. The Council considers this uncertainty unacceptable given the sensitivity of the sites involved.

6. Cumulative effects
The Council notes that the Green Hill Solar Farm does not exist in isolation. The RIES confirms that effects must be considered in combination with other plans and projects. However, concerns remain that cumulative impacts, particularly in relation to disturbance, hydrology and pollution, have not been fully resolved.

Conclusion

Given the extremely close proximity of the proposed development to internationally protected wetlands, the Council considers that the Green Hill Solar Farm carries an inherently high risk of harm. The Examining Authority's report identifies a number of impacts which cannot yet be ruled out, and important matters remain unresolved.

In these circumstances, and applying the precautionary approach required under the Habitats Regulations, Grendon Parish Council considers that adverse effects on the integrity of the Upper Nene Valley Gravel Pits SPA and Ramsar site cannot be excluded. The Council therefore objects to the proposal and considers that consent should not be granted - unless and until these issues are satisfactorily resolved.

Submitted by:
Grendon Parish Council