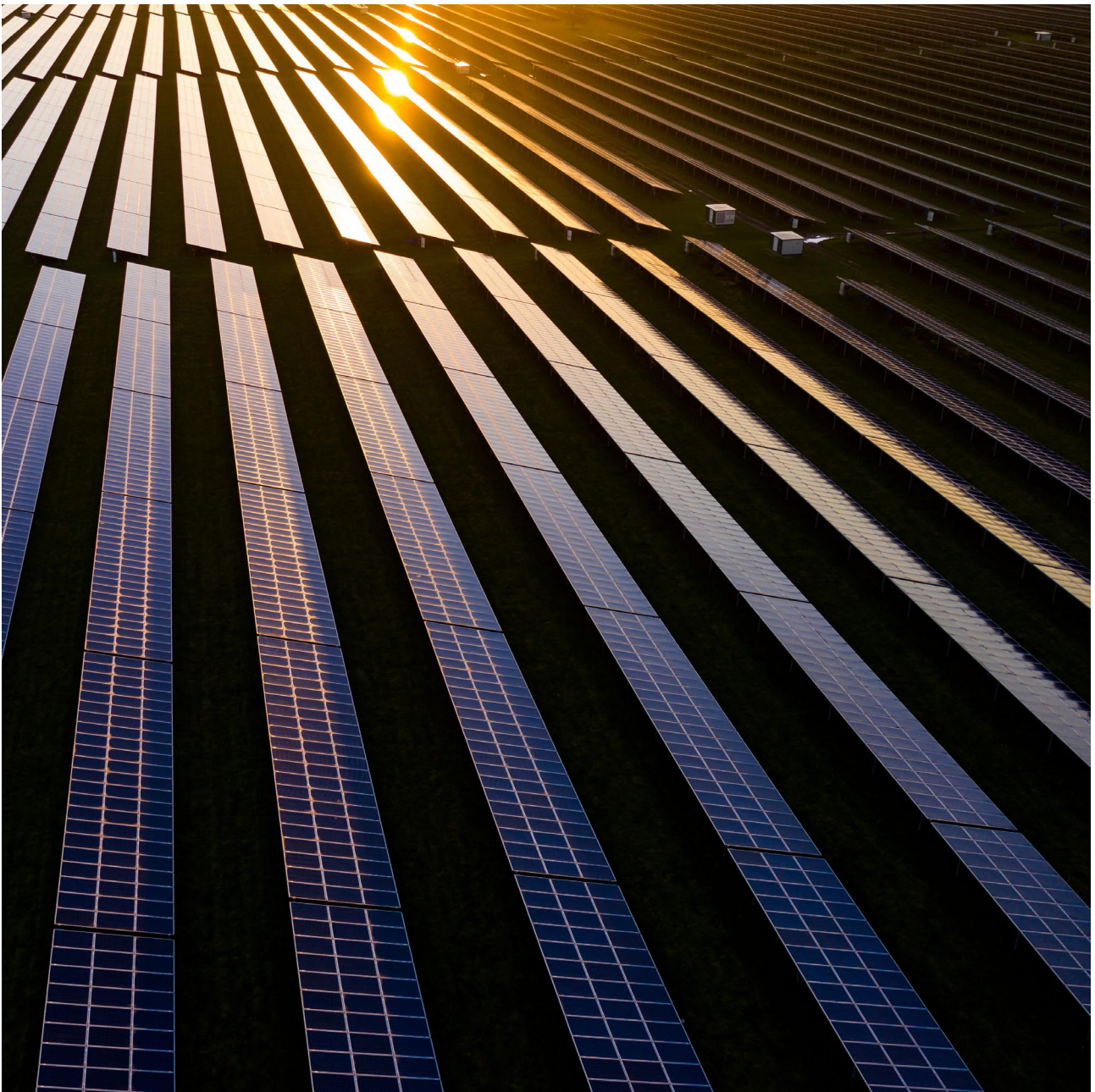




3535: Green Hill Solar Farm
Representations to the Milton Keynes 2050 Emerging Local Plan



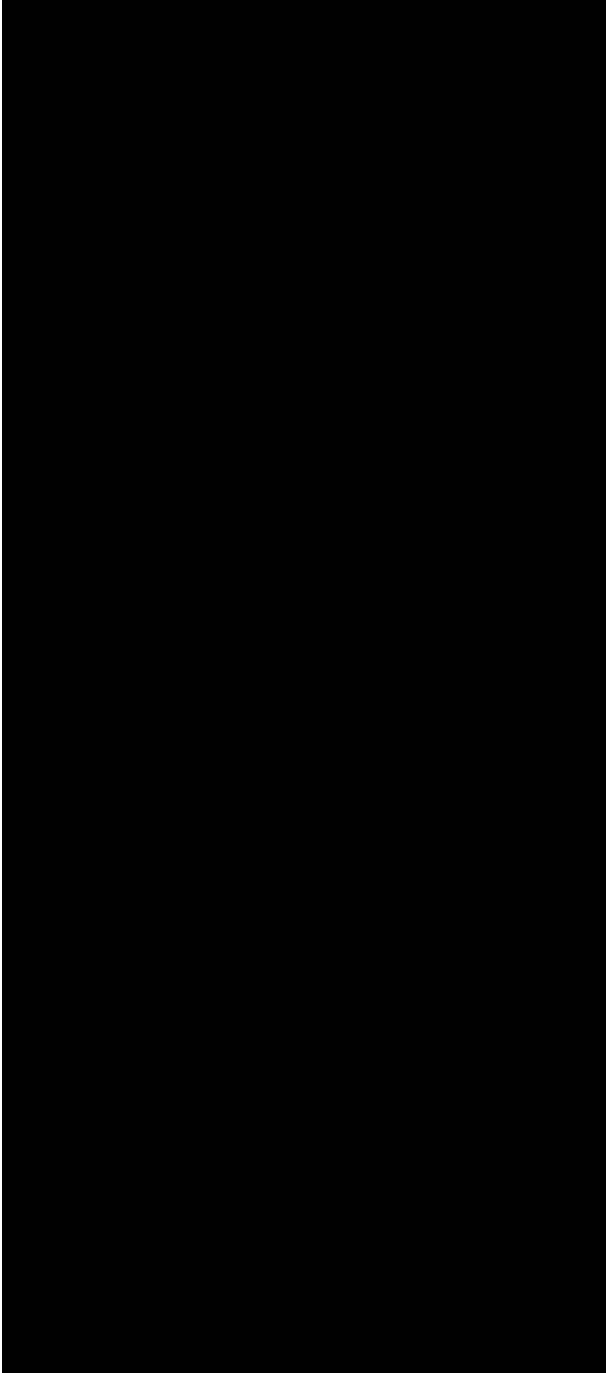
Regulation 19 Representations to the Milton Keynes 2050 Emerging Local Plan

Green Hill Solar Farm

Green Hill Solar Farm Limited

February 2026

Office Locations



Issue Sheet

Document Prepared for: Green Hill Solar Farm Limited

Regulation 19 Representations to the Milton Keynes 2050 Emerging Local Plan:

3535: Green Hill Solar Farm

Prepared by:

Name: Victoria Yeandle

Title: Associate Planner

Date: January 2026

Approved by:

Name: Jane Crichton

Title: Associate Planning Director

Date: February 2026

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Contents

1	INTRODUCTION	4
	STRUCTURE OF DOCUMENT	4
	BACKGROUND TO SCHEME	4
	GREEN HILL SOLAR FARM LIMITED	5
	DCO PROCESS	5
	SITE CONTEXT: GREEN HILL G AND CABLE ROUTE CORRIDOR	6
	GREEN HILL G – PROPOSED LAYOUT	7
	LOCAL PLANNING POLICY	7
2	RESPONSES TO THE MK CITY PLAN 2050 REGULATION 19 CONSULTATION: EMERGING LOCAL PLAN POLICIES	8
	MK CITY PLAN 2050	8
	EMERGING POLICY GS7: WIND AND SOLAR DEVELOPMENT SPATIAL STRATEGY	8
	EMERGING POLICY CEA6: LOW AND ZERO CARBON ENERGY PROVISION	9
	EMERGING POLICY CEA12: CONSERVING AND ENHANCING LANDSCAPE CHARACTER/SPECIAL LANDSCAPE AREAS	9
3	CONCLUSION	16
	BACKGROUND TO SCHEME	16
	RESPONSE TO EMERGING POLICIES AND PROPOSED ACTIONS	16
	CONCLUSION	17

Appendices

APPENDIX 1	LOCATION OF GREEN HILL G WITHIN SOLAR FARM AREA OF SEARCH
APPENDIX 2	GREEN HILL G FIELD NUMBERING
APPENDIX 3	INDICATIVE LAYOUT

1 Introduction

1.1.1 Lanpro has prepared this response to the Milton Keynes 2050 Regulation 19 consultation on behalf of Green Hill Solar Farm Limited (GHSF) in relation to their land interests associated with the application for a Development Consent Order (DCO) for the construction, operation and maintenance and decommissioning of Green Hill Solar Farm ('the Scheme') with a total capacity exceeding 50 megawatts.

1.1.2 Specifically, this response provides comment on the following emerging policies:

- GS7 Wind and solar development spatial strategy;
- CEA6 Low and zero carbon energy provision; and
- CEA12 Conserving and enhancing landscape character/Special Landscape Areas.

Structure of Document

1.1.3 This document comprises the following sections:

- Section 1 – Introduction: Provides an introduction to these representations, sets out the site context for the land with MKCC and provides a summary of the DCO process.
- Section 2 – Responses to the MK City Plan 2050 Regulation 19 Consultation: Emerging Local Plan Policies
- Section 3 – Conclusion: Summarises the responses to the emerging Local Plan policies.

Background to Scheme

1.1.4 The Scheme comprises in total 1,441.4 hectares (ha) of land located within the administrative areas of North Northamptonshire Council, West Northamptonshire Council and Milton Keynes City Council. The Scheme comprises nine sites which are located to the north-east and south-east of Northampton and the west and south of Wellingborough. These sites are described as Green Hill A, Green Hill A.2, Green Hill B, Green Hill C, Green Hill D, Green Hill E, Green Hill F, Green Hill G and Green Hill BESS.

1.1.5 The Scheme consists of an electricity generating station with a capacity of approximately 500 MW comprising of ground mounted Solar Arrays and associated development, the latter encompassing: energy storage, grid connection infrastructure and any other infrastructure as well as works integral to the construction, operation, maintenance and decommissioning of the Scheme. The national grid connection Point of Connection will be at the Grendon 400kV National Grid Substation.

1.1.6 Green Hill G and part of the Cable Route Corridor (CRC) is located within the administrative boundary of Milton Keynes City Council (MKCC). A location plan of Green

Hill G and the area within MKCC's jurisdiction is at **Appendix 1** and a plan showing the field numbering for Green Hill G is at **Appendix 2**.

Green Hill Solar Farm Limited

- 1.1.7 Green Hill Solar Farm Limited is part of Island Green Power Limited (IGP), which is a leading developer of utility-scale solar projects and battery storage systems, established in 2013.
- 1.1.8 IGP has successfully delivered nearly 40 projects worldwide that have generated more than 3 GW of energy capacity. This includes 21 solar and storage projects in the UK. These range in size from below 5MW to Nationally Significant Infrastructure Projects (NSIPs) such as Cottam Solar Project, currently the UK's largest consented solar farm, which will generate 600MW of clean, renewable, and secure electricity including 600MW of battery storage.
- 1.1.9 Their mission is to be the leading innovator in sustainable, clean energy development by pioneering solutions that facilitate the energy transition, conserve the planet's ecosystems and empower local communities.
- 1.1.10 Recently, IGP's Cottam and West Burton projects have received DCOs. The Cottam Solar Project was granted development consent by the Secretary of State on 5 September 2024. The West Burton Solar Project was granted development consent by the Secretary of State on 24 January 2025.

DCO Process

- 1.1.11 As noted above, GHSF submitted a DCO application for the Scheme to the Secretary of State c/o to the Planning Inspectorate pursuant to section 14(1)(a) and 15(1) and 15(2) of the Planning Act 2008 on 23 May 2025 and this was accepted for examination on 19 June 2025. The Examination of the DCO application is ongoing and due to close on the 10 April 2026.
- 1.1.12 Throughout the pre-application stage, GHSF undertook three stages of community consultation. This included:
- a non-statutory consultation consisting of a soft launch of the project in January 2024, early introductory meetings with stakeholders and five early-engagement workshops between March and May 2024;
 - a statutory public consultation on more detailed proposals, including the Preliminary Environmental Information Report (PEIR), held for six weeks between 7 November and 19 December 2024; and
 - a supplementary consultation, referred to as a 'targeted consultation', for 28 days between 13 March and 10 April 2025.

- 1.1.13 In addition, there was ongoing consultation with MKCC, which comprised regular meetings, including with the Council's technical specialists which remain ongoing. MKCC, along with the other Local Authorities, has played a key role in informing the development of the Scheme, including the Environmental Statement. GHSF is developing a Statement of Common Ground with MKCC which is currently in draft and submitted into the Examination. This covers all matters relating to the Scheme including landscape, historic environment, ecology, hydrology and flood risk and transport and access.

Site Context: Green Hill G and Cable Route Corridor

- 1.1.14 Green Hill G lies entirely within the administrative boundary of Milton Keynes City Council and extends to approximately 170.9 ha. Green Hill G is located near the tripoint of North Northamptonshire, Milton Keynes and Bedford Borough Councils.
- 1.1.15 Green Hill G comprises open agricultural fields separated by hedgerows and scattered trees, with substantial woodland (Threshire Wood) to the north-east. The land slopes gently from north to south, ranging from approximately 70m to 105m above ordnance datum, with a shallow valley and small stream through the centre. Green Hill G has a main access from the A428.
- 1.1.16 A 400kV overhead power line crosses the southern half of Green Hill G. The village of Lavendon is approximately 500m south-east, while the hamlet of Warrington has a few dispersed properties to the west and south. Bozeat is located approximately 2.4km to the north and Olney 2.6km south-west. There are a few isolated properties, including Northey Farm to the north-west and a petrol station to the south-west, accessible via the Warrington Toll Bar Roundabout.
- 1.1.17 Bridleway MK|Lavendon|002 and Bridleway MK|Lavendon|014 form a continuous north-south route along most of the eastern boundary of Green Hill G. The bridleway continues in both directions beyond Green Hill G towards Hinwick to the north and Clifton Reynes to the south. This route forms part of the Three Shires Way.
- 1.1.18 Bridleway MK|Lavendon|014 links Tinick Lane to Castle Road along the northern boundary of Field GF13, while Bridleway MK|Lavendon|004 links Bridleway MK|Lavendon|002 to Castle Road via the north of field GF9.
- 1.1.19 The majority of Green Hill G is located in Flood Zone 1. However, a limited area to the southern boundary is identified as being in Flood Zone 3. The Environment Agency Historical Flood Map indicates that Green Hill G has not historically flooded and neither has the area immediately surrounding Green Hill G.
- 1.1.20 Lavendon Conservation Area is located approximately 575m to the south-east of Green Hill G. The nearest Listed Building is 33 Northampton Road, which is Grade II Listed, located approximately 600m to the south-east of Green Hill G. The Lavendon Castle: a Scheduled Monument is located approximately 300m to the east of Green Hill G.
- 1.1.21 The nearest SPA and Ramsar site (Upper Nene Valley Gravel Pits) is located approximately 6.2km north of Green Hill G. The nearest SSSI is Bozeat Meadow, located 2.9km north of

Green Hill G. There are two other SSSIs (Dungee Corner Meadow and Yardley Chase) located within 5km of Green Hill G.

- 1.1.22 Horn Wood is located 1.4km to the north of Green Hill G, which qualifies as a Local Wildlife Site.

Green Hill G – Proposed Layout

- 1.1.23 **Appendix 2** outlines the illustrative layout for Green Hill G which has been submitted as part of the DCO application. The layout isn't fixed at this time; the detailed design will be approved via the discharge of requirements process with the relevant local planning authorities if the DCO is granted. The majority of fields within the site are proposed to include solar arrays. There will be a substation located to the south-west of field GF3, west of the overhead line which dissects Green Hill G. Access to Green Hill G will be taken from the A428.
- 1.1.24 Two permissive paths for pedestrians are proposed within the Site:
- One connecting existing PRoWs, footpath Lavendon|FP1 and bridleway Lavendon|BW2, running along the northern boundaries of fields GF1 and GF2; and
 - Another permissive path also connecting existing PRoWs, footpath Lavendon|FP1 and bridleway Lavendon|BW2, between fields GF6 and GF9.

Local Planning Policy

- 1.1.25 The Site is within the designated Lavendon Neighbourhood Plan Area. The Lavendon Neighbourhood Plan was 'made' in March 2020 and forms part of the MKCC Development Plan, alongside MKCC's current Local Plan (Plan:MK 2016-2031), which was adopted in March 2019. GHSF has provided a full planning policy appraisal within the Planning Statement which forms part of the DCO submission to the Secretary of State ([GH7.15 A Planning Statement Revision A.pdf](#)).

2 Responses to the MK City Plan 2050 Regulation 19 Consultation: Emerging Local Plan Policies

2.1.1 This section sets out GHSF responses to the emerging Local Plan policies, which are considered relevant to the land subject to their DCO application, with a particular focus on Green Hill G and the CRC, which are located within the jurisdiction of Milton Keynes City Council.

MK City Plan 2050

2.1.2 This Regulation 19 (pre-submission) consultation was published in November 2025. In the Council's ambitions, it states:

"Tackling climate change and reducing carbon emissions is a key component of our ambition, which is a benefit of delivering places that are healthy and people friendly".

2.1.3 This follows on from Milton Keynes Council declaring a climate emergency in 2019.

2.1.4 To support the emerging Local Plan, the Council prepared a Carbon and Climate Study, which set out policy recommendations on how the Council can achieve its ambition of being carbon negative by 2050.

2.1.5 The Carbon and Climate Study (2024) highlights the previous government's commitment to UK Net Zero by 2050. It refers to 'Powering up Britain', which set out the need to increase solar power generation fivefold by 2035 and confirms that ground-mounted solar is one of the cheapest forms of electricity generation and readily deployable at scale.

2.1.6 The following emerging policies below, which are considered relevant to the Scheme and in particular, Green Hill G, have been responded to.

Emerging Policy GS7: Wind and Solar Development Spatial Strategy

2.1.7 Green Hill G is located within the preferred area for solar development, in line with Part A of the Policy. **Appendix 1** contains a plan showing the location of Green Hill G and extent of land which is within the preferred area for solar development. GHSF is supportive of this designation as it has also been considered as suitable for solar development through GHSF's own site selection and iterative design process.

2.1.8 It is noted that the area of search in policy GS7 has been based on an analysis of suitable land in rural areas, taking into account the following key considerations set out below (as set out in the supporting text to emerging policy GS7) which largely aligns with the Schemes approach to site selection and design considerations for the Site:

- Land in flood risk zone 3;
- Designated sites (e.g. SSSIs) that are important for the natural habitat they provide;
- Best and most versatile agricultural land;

- Ancient woodlands and all wooded areas;
- Priority habitats;
- Scheduled monuments;
- Ministry of Defence installations;
- Public green spaces;
- Urban/built-up areas; and
- Inland waters.

2.1.9 GHSF is pleased to note that MKCC supports solar development and GHSF supports planning policies seeking to identify suitable locations for solar development. This provides a clear policy led approach for future development which is beneficial to developers and the wider community. This policy provides an independent analysis which has identified that parts of Green Hill G is considered suitable for solar. This policy will contribute to the ambition of reducing carbon emissions and GHSF does not wish to raise any objection or comment on this policy.

Emerging Policy CEA6: Low and Zero Carbon Energy Provision

2.1.10 GHSF strongly supports the ‘low carbon and renewable energy and supporting infrastructure’ part of the policy as it supports a project, such as the Scheme, subject to the considerations as noted within the policy.

2.1.11 GHSF is pleased to note that MKCC recognises the intrinsic need for renewable energy production, including solar farms, to help meet the UK’s 2050 Net Zero target and MKCC’s ambition to reduce carbon emissions and considers the policy to be appropriately drafted to achieve these ambitions.

Emerging Policy CEA12: Conserving and Enhancing Landscape Character/Special Landscape Areas

2.1.12 GHSF objects to elements of this proposed policy relating to the Special Landscape Area designations as shown on the Policies Map with regard to the inclusion of areas of Green Hill G within the proposed Special Landscape Area (SLA).

Conserving and Enhancing Landscape Character

Part A - Development proposals must demonstrate that they conserve and, where possible, enhance the landscape character through sensitive design, mitigation and enhancement measures.

- 2.1.13 GHSF does not raise any specific concern to this part of the policy and considers that this wording does not represent a policy constraint, rather a proportionate approach to the consideration of proposals in terms of landscape character.

Part C - Development proposals affecting Special Landscape Areas will only be permitted where they:

1. Conserve and, where possible, enhance the special character and key landscape qualities of the area;
2. Protect important views, features, landmarks and historic layout and setting of villages and hamlets;
3. Preserve the tranquillity of the area and the need to protect against intrusion from light pollution, noise and motion; and
4. Maintain and, where feasible, improve public access to the countryside.

- 2.1.14 GHSF is pleased that the Council recognises the importance of allocating land for renewable energy as it contributes towards Milton Keynes reducing its carbon emissions as well as helping to meet the UK's Net Zero carbon emissions. GHSF is objecting to the inclusion of parts of Green Hill G being located within the proposed extension of the Ouse Valley Special Landscape Area, as it considers that fields GF9 and GF13 do not contribute to the purposes of the SLA. It should be noted that the same land is also allocated as being within a preferred area for solar development under emerging policy GS7. GHSF is mindful that policy designations may overlap, but where this occurs the policies will typically be compatible with each other which is not considered to be the case in this situation.

- 2.1.15 The comments which have been submitted by MKCC within their Local Impact Report to the DCO examination state in paragraph 4.9 that *"It is considered that the development of these two parcels would be detrimental to the cohesiveness of the proposed SLA, which were proposed to be included to include the historic villages and surroundings within the north of the borough. Including these two parcels as part of the development would therefore be detrimental to the character of the SLA, given the industrialising nature of the development, in this location where it would be highly visible on the landscape, particularly in the area around Lavendon."*

- 2.1.16 This comment indicates that MKCC also consider the principles of the two policies are incompatible and there is conflict between the nature of development allowed for under

emerging policy GS7 and the proposed extension of the SLA. This incompatibility should be resolved to enable the policies in the emerging Local Plan to be consistently applied.

- 2.1.17 For the reasons set out in this response, with reference to the detailed environmental assessment of the impact of solar development in this area, it is clear that the areas of land within Green Hill G do not contribute towards the SLA or the purposes for the designation in policy CEA12, and it should therefore be removed from these areas.

Milton Keynes Review of Landscape Designations

- 2.1.18 It is understood that part of the evidence base to support CEA12, the SLA has been determined following the review of landscape designations completed in May 2024.
- 2.1.19 The Ouse Valley special landscape character area was formerly designated as the Ouse Valley AAL. As part of the review of landscape designations, the report recommended extending the *'boundary north to encompass the historic villages on the valley sides (Stoke Goldington, Ravenstone and Lavendon), as well as Scheduled Monuments east of Lavendon'*.
- 2.1.20 The full evaluation for the Ouse Valley, refers to various assessment criteria including its natural and cultural heritage qualities, recreation value, landscape quality, local distinctiveness and functionality. All of these criteria have been considered by GHSF within their DCO application, set out below is a summary of our assessment against these criteria.

Cultural Heritage

- 2.1.21 GHSF has considered fully the historic environment in and around the full Order Limits in its Environmental Statement. There are two designated heritage assets subject to detailed assessment due to the potential for indirect (i.e. setting) impacts as a result of solar development on Green Hill G. These were: the Scheduled Lavendon Castle (NHLE 1009542) and Grade II Listed Lavendon Castle Farmhouse (NHLE 1212559). Lavendon Castle (NHLE 1009542) does not share any direct relationship with Green Hill G and remains enclosed upon the discrete remains of the former castle. While the asset does share some limited historical relationship with Green Hill G in the broadest sense, as land within it would have once come under the jurisdiction of the Lavendon Castle, this relationship was removed by the demolition of the castle in the 16th century and by the construction of a homestead on this site in the 17th century. The Grade II Listed Lavendon Castle Farmhouse (NHLE 1212559) does not derive any significance from land within Green Hill G, nor does it share any specific historical or visual relationship with the fields within it. Therefore, it is concluded that the land within the Scheme does not contribute to the significance of these two heritage assets, they would maintain their historic and architectural interests, and there would be no impact to their significance from the Scheme. This position has not been challenged by Historic England.

- 2.1.22 Lavendon Conservation Area, along with the numerous designated assets located within it, were agreed by the Secretary of State to be scoped out of detailed assessment for the Scheme due to the lack of historical association or visual relationship with land within Green Hill G (please refer to the Scoping Report for the Scheme and the Scoping Opinion adopted by the Secretary of State, both available via the Planning Inspectorate website). The village is located in a low point in the landscape and is screened from the Scheme by existing vegetation and intervening built forms. Therefore, there will be no impact to the significance of any heritage assets within the conservation area, or to the character of the conservation area, from solar development within Green Hill G.
- 2.1.23 GHSF identified that the Milton Keynes Council Historic Landscape Character (MKHLC) maps all areas within Green Hill G as belonging to the 'Enclosure' Broad HLC Type. The majority of these areas are detailed as relating to either 18th century parliamentary enclosure or fields established in the 20th century. The exception is GF9, which is mapped as pre-18th century irregular enclosure. Post-medieval enclosure is a common field pattern type found across much of the rural landscape of the Milton Keynes borough, and it is therefore considered to have a low 'value' of sensitivity. Elements that characterise the historic landscape within the Order Limits of the Scheme (such as hedgerows) will be retained, and any temporary change in land use will be reversed following decommissioning and this is likely to be the case for many renewable energy developments. It is considered that the development on Green Hill G will not alter the ability to understand the historic landscape character within the Order Limits and the legibility of the historic landscape and field pattern will be maintained.
- 2.1.24 The heritage assets scoped in for assessment were agreed during consultation with Historic England and the Milton Keynes Conservation Officer between April 2024 and February 2025. Milton Keynes City Council state in paragraph 4.31 of its Local Impact Report in relation to the Scheme: "*The proposal would not have any impact upon the setting of nearby listed buildings or upon the Lavendon Conservation Area. A total of 10 Historical Landscape Character areas have been mapped within Site G*" (see Milton Keynes City Council Local Impact Report (LIR) [[Milton Keynes City Council Local Impact Report](#)]).

Landscape quality (condition and intactness)

- 2.1.25 Green Hill G and its immediate surroundings are located on large scale open farmland. The Site and the immediately surrounding landscape are large scale and away from the settlements such as Lavendon and Warrington, in arable use.
- 2.1.26 Green Hill G demonstrates characteristics that are found and replicated across the wider surrounding landscape including the predominance of large to medium to large scale arable fields, and outside of the large woodland blocks that contain the northern and eastern extents of the Site, there is an overall lack of woodland across the Site. Tree cover is currently provided by hedgerows trees along the field boundaries and along the watercourse.

- 2.1.27 There are a number of incongruous elements locally, including the high voltage transmission lines, the A509 and the A428 which detract from the aesthetic and perceptual value of this area.
- 2.1.28 From the elevated areas of the Site, long distance panoramic views are available south across the Ouse valley. The Three Shires Way and the Milton Keynes Boundary recreational routes pass through the Site.
- 2.1.29 There are no landscape designations across the Site or across the Local Area, nor any demonstrable physical attributes that would warrant elevating the value of this landscape. However, fields GF9 and GF13 fall within land identified by MKCC as being a Candidate Special Landscape Character Area – Ouse Valley. If adopted, this would be a new extension to the Ouse Valley SLA to cover the historic, scenic villages of Stoke Goldington, Ravenstone and Lavendon – the last of which is separated from Green Hill G by around 500m.

Local distinctiveness

- 2.1.30 The countryside surrounding Green Hill G comprises a good quality landscape that is typical of the surrounding Milton Keynes LCT1 Wooded Wolds, LCA1a Yardley Chase Wooded Wolds within the northern most half of the Site, and Milton Keynes LCT2 Undulating Valley Slopes, LCA2a Ouse Northern Undulating Valley Slopes.
- 2.1.31 However, there is evidence of some degradation and occasional detracting features within Green Hill G, including the high voltage transmission lines and the A428, both of which pass through the proposed SLA extension area.

Perceptual and scenic

- 2.1.32 Green Hill G is split between two landscape character areas, Milton Keynes LCT1 Wooded Wolds, LCA1a Yardley Chase Wooded Wolds within the northern most half of the Site, and Milton Keynes LCT2 Undulating Valley Slopes, LCA2a Ouse Northern Undulating Valley Slopes within the southern area, however the character across the Site is fairly consistent, with the greatest change associated with the change in elevation. The Site predominantly slopes south from 100m AOD along the northern boundary to 80m AOD towards the A428 at the southern boundary.
- 2.1.33 The A509 runs alongside the Sites western boundary with the Site mostly screened by roadside vegetation. The northern site boundary and part of the eastern boundary runs alongside Threshire Wood and The Oaks Wood, which provides enclosure to the site to the north and north east, and given their position on the higher landform form a wooded horizon in this direction.
- 2.1.34 A series of high voltage transmission lines cross directly across the Site running through fields GF13, GF12, GF11 and GF3 (please refer to **Appendix 2** for field numbering).

- 2.1.35 The Three Shires Way and the Milton Keynes Boundary recreational routes pass through the Site. The Wooded Wolds LCT is a typical rural landscape and is generally in good condition, with intact hedgerow field boundaries and a strong historic field pattern. There has been some modern amalgamation of fields, and some use of post and wire fencing for horse grazing. Semi-natural habitats are in good condition, with a mixed age structure, although woodlands are scattered.
- 2.1.36 Road noise is prevalent, particularly given the proximity of the adjacent A roads, with these and the high voltage transmission line forming a visual intrusion and detracting from the character of the immediate area surrounding the Site.
- 2.1.37 From the more elevated locations of the Site, including from the PRow, there are long panoramic views to the south over the Ouse valley. Land is predominately under arable cultivation, with considerable 20th century field amalgamation, as a result of modern farming techniques, creating large scale fields, such as those within the Site. There are smaller areas of pasture near settlements or on the edges of woodland. Field boundaries are generally low, clipped hedgerows with occasional mature hedgerow trees. Hedgerows along the minor roads are in better condition than field hedgerows.
- 2.1.38 The northern area of the Site is identified as being within the 1a Yardley Chase Wooded Wolds. This is a narrow strip of land on the northern edge of the borough. It forms the foreground to the wooded Yardley Chase and Salcey Forest to the north (within Northamptonshire), and is part of the wooded plateau, with topography ranging from 85m to 110m AOD.
- 2.1.39 The majority of the land use is arable with smaller areas of pasture near farmsteads. Hedgerows are in generally good condition, and are often species-rich. This is a rural, and at times remote landscape, with dark night skies in the north, especially within the woodlands.
- 2.1.40 Modern influences include an electricity pylon route in the east, modern garage at Warrington House, which is out of place in the rural landscape and views to Milton Keynes city to the south. Road noise from the M1 and other major roads reduce the levels of tranquillity throughout the area, despite its rural character. The southern area of the Site is located within the LCA2a Ouse Northern Undulating Valley Slopes which comprises the valley landscapes along the course of the River Ouse and the River Tove. This is an open and gently sloping landscape, predominantly in arable use. It is generally a quiet and picturesque rural landscape with limited impact from modern development.
- 2.1.41 A mixed field pattern dominated by large-scale arable fields with unclipped hedges. Smaller pasture fields are common on lower slopes with those near settlements often used for horse grazing. Contrary to the character of the Site, the Undulating Valley Slopes LCT is identified as having a remote character with few modern detractors.
- 2.1.42 The containment provided by the A428 separates the Site from the surrounding Undulating Valley Slopes LCT that is much more defined across the landscape to the south. The character of the southern areas of the Site are considered more in keeping with the descriptions of the 1a Yardley Chase Wooded Wolds LCA.

Functional

- 2.1.43 It is acknowledged that Green Hill G is located adjacent to Threshires Wood but any Scheme will have the ability to incorporate mitigation measures such as offsets, buffers and standard tree protection measures during construction, operation and decommissioning to maintain the functionality.

Recreation Value

- 2.1.44 The Milton Keynes Boundary Walk has been considered within the Environmental Statement Chapter 17: Socio-Economics, Tourism and Recreation of the Scheme. The assessment outlines that during construction, a temporary significant effect will likely occur associated with direct impacts from onsite infrastructure and cabling construction works. Embedded mitigation to limit impacts on these features will be secured in the accompanying management plans. This will include provision of suitable temporary diversions and notices of closures, and the provision of temporary management measures at HGV crossing points, such as signage and banksmen, to mitigate impacts upon PRow users.
- 2.1.45 During operation, through the Scheme's design and embedded mitigation, the routing and access of all existing PRowS and permissive recreation routes within the Order Limits throughout the operational lifetime of the Scheme is preserved, except during times of infrastructure replacement. Furthermore, embedded landscape mitigation will establish and mature during the first 15 years of the Scheme's operational lifetime, providing long-term visual mitigation for PRow users. There is sufficient ability and control through the planning system that could require any Scheme to consider, assess and mitigate the recreational value of a piece of land without additional policy constraint.
- 2.1.46 In summary, it is considered by GHSF that Green Hill G does not meet the purposes of the SLA and the extension should not be extended into fields GF9 and GF13.

Part D - Development proposals must include appropriate measures to mitigate landscape and visual impacts. Landscape and Visual Impact Assessments shall consider the Milton Keynes Landscape Character Assessment, the Statements of Significance for each of the Special Landscape Areas, and any other relevant landscape and visual assessments or studies.

- 2.1.47 GHSF does not raise any specific concern to this part of the policy and considers that this wording does not represent a policy constraint, rather a proportionate approach to the consideration of proposals in terms of appropriate mitigation measures.

3 Conclusion

Background to Scheme

- 3.1.1 These representations have been prepared by GHSF in relation to their land interests associated with the application for a Development Consent Order for the construction, operation and maintenance and decommissioning of Green Hill Solar Farm.
- 3.1.2 The Scheme in total extends to approximately 1,441 hectares, located within the administrative areas of North Northamptonshire, West Northamptonshire and Milton Keynes.
- 3.1.3 Part of Green Hill G and the Cable Route Corridor is located within the administrative boundary of Milton Keynes City Council. Green Hill G extends to approximately to 170.9 hectares and is located near the tripoint of North Northamptonshire, Milton Keynes and Bedford Borough Councils.
- 3.1.4 The majority of fields within the Site are proposed to include solar arrays.

Response to Emerging Policies and Proposed Actions

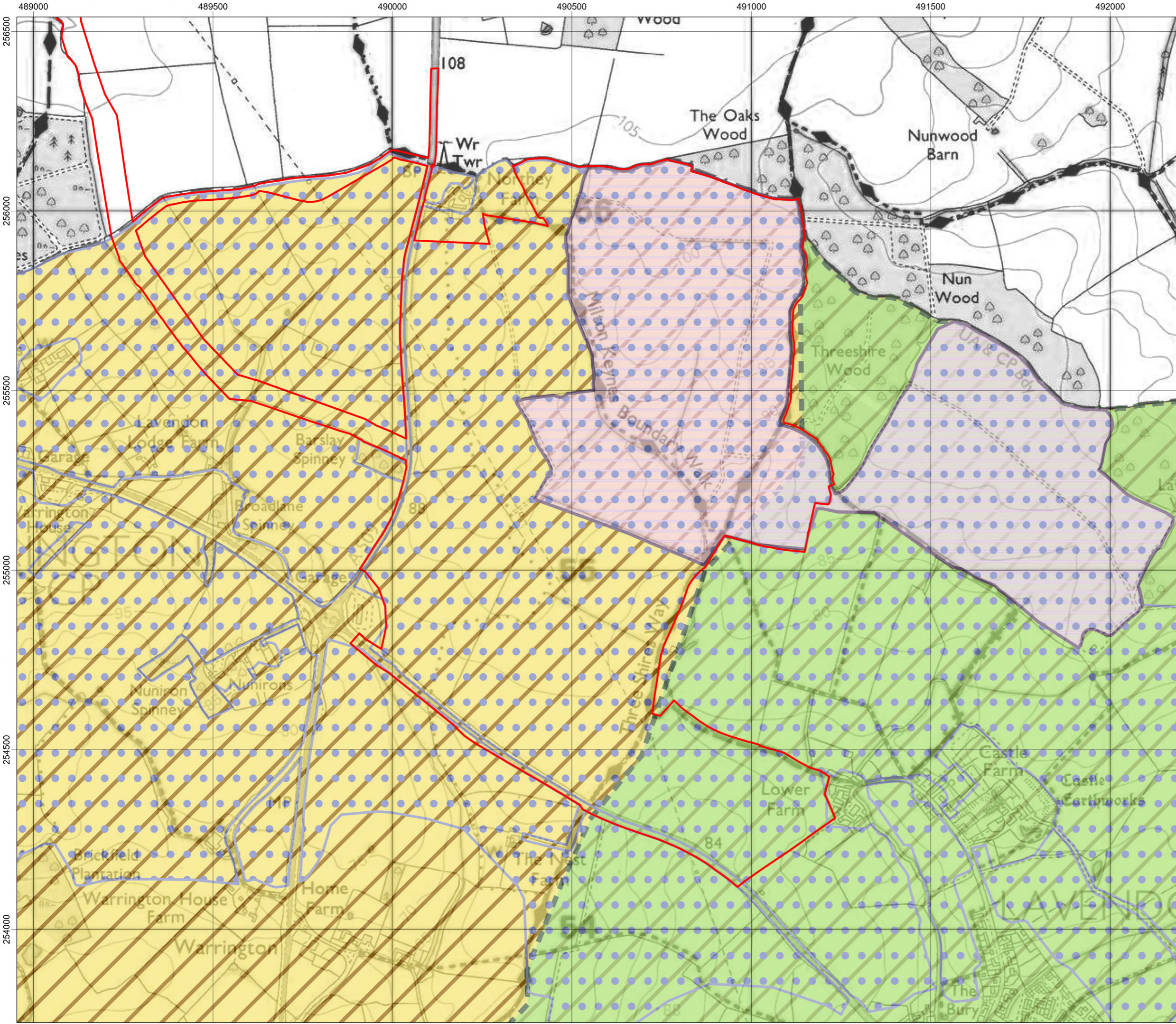
- 3.1.5 Green Hill Solar Farm Limited is pleased that Green Hill G is within the preferred area for solar development, in line with emerging Policy GS7 and therefore, the principle of development for the scheme is considered acceptable.
- 3.1.6 Green Hill Solar Farm Limited is satisfied to note that that Milton Keynes recognises the importance of low and zero carbon energy production, including solar farms to help meet the UK's wider 2050 net zero carbon emissions through emerging Policy CEA6.
- 3.1.7 However, GHSF wishes to raise objection to elements of emerging policy in relation to the Special Landscape Area as shown on the Policies Map, which is set out in emerging Policy CEA12.
- 3.1.8 Green Hill Solar Limited specifically objects to Part C of emerging policy CEA12 as it considers that Green Hill G should not be included in the proposed extension of the SLA as it does not contribute to the purposes of the SLA. Green Hill G is also proposed to be designated under emerging policy GS7 as a preferred area for both solar and wind development. Whilst GHSF is mindful that policy designations may overlap, where this occurs the policies will typically be compatible with each other. However, the Council has highlighted that these policies are in conflict during the DCO examination, stating that the proposed solar development at Green Hill G would be detrimental to the character of the Special Landscape Area, while, at the same time, designating that area as a preferred area of search for solar within its emerging Local Plan.

- 3.1.9 It is clear from this conclusion that in this instance the two policies are not compatible with each other and there is an inherent conflict.
- 3.1.10 It is GHSF position that the extension of the SLA should not extend into Green Hill and this designation should be removed from Green Hill G as the land does not meet the purposes of the SLA and is a policy conflict to the Council in achieving its ambition of reducing carbon emissions.
- 3.1.11 Notwithstanding the assessment evidence demonstrating that the land within Green Hill G does not contribute to the Ouse Valley SLA, and does not share the attributes of other land within the proposed extension, GHSF believes that its assessment of the Scheme and the mitigation and landscaping proposals demonstrate clearly that solar development is not inherently incompatible with an SLA designation. In the event policy CEA12 is retained in areas of Green Hill G, and in other areas that are also within policy GS7, it is suggested that the Local Plan make clear this inherent *compatibility* between solar development and the SLA in the overlapping areas. This would provide guidance as to the landscaping and other measures a project must take to ensure this compatibility, leading to certainty for developers and clarity over how the emerging Local Plan is to be applied.

Conclusion






- 3.1.12 In conclusion, part of the Green Hill DCO (Green Hill G) is located within Milton Keynes area of jurisdiction.
- 3.1.13 Green Hill Solar Farm Ltd is pleased that there is a focus on Milton Keynes promoting zero carbon energy generation and is satisfied that Green Hill G is located within preferred area of search for solar development.
- 3.1.14 There is a conflict between the designation of the preferred area for solar development and the proposed extension of the Special Landscape Area, where these overlap. Green Hill Solar Farm Ltd objects to this extension overlapping with the preferred area for solar development within Green Hill G. It is not considered that the land is of a significant landscape value to warrant this protection and should be excluded from any proposed extension of the SLA. Alternatively, the policies should be revised to provide clarity on how solar and wind development must be designed so as to be compatible with the overlapping SLA allocation.

Appendix 1 Location of Green Hill G within Solar Farm Area of Search



Title: Figure 8.14 Green Hill G: Milton Keynes City Plan 2050 Emerging Allocation

Document: Volume 1 Landscape and Visual Environmental Statement (ES)

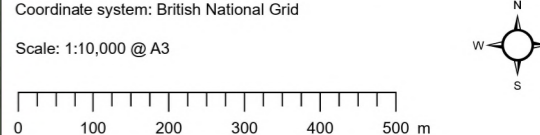
- Legend:
-  Order Limits
 - Milton Keynes City Plan 2050**
 -  Housing Viability Area 1
 -  Special Landscape Area
 -  Solar Farm Area of Search
 -  Wind Turbine Area of Search

Data: Milton Keynes City Council, 2025; Lanpro, 2025; IGP, 2025
 Base map: © Crown copyright and database rights 2025, Ordnance Survey 0100031673
 Ordnance Survey 0100031673



APFP Regulation: 5(2)(a)
 Application Doc No.: EN010170/APP/GH6.4.8.14
 Drawing no.: P3535_LPR_ZZ_XX_M2_Z_OPN_0338

Coordinate system: British National Grid
 Scale: 1:10,000 @ A3




Appendix 2 Green Hill G Field Numbering

489000

490000

491000

492000

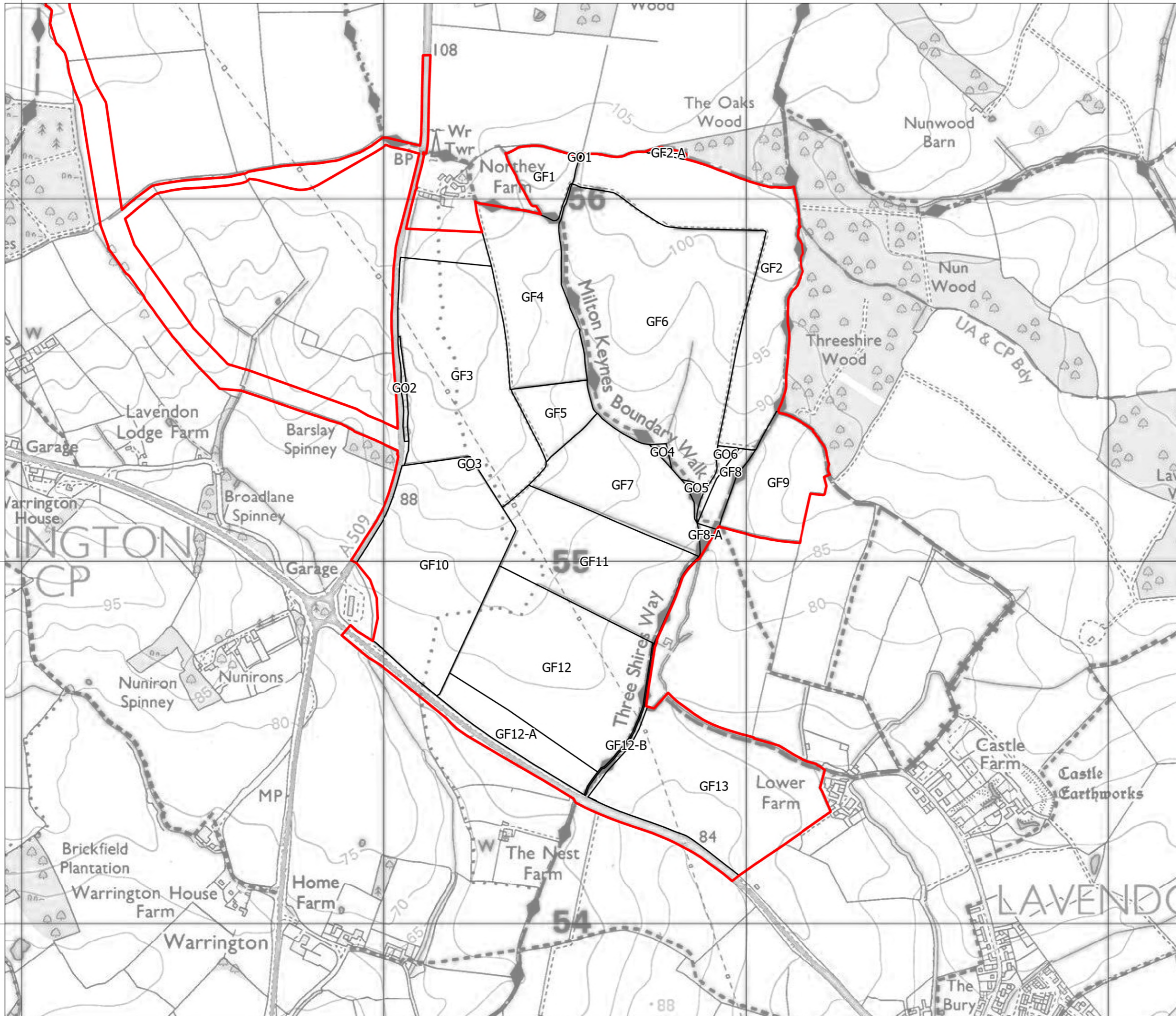


Title: Figure 3.1.5 Field Numbering Plan
Green Hill G

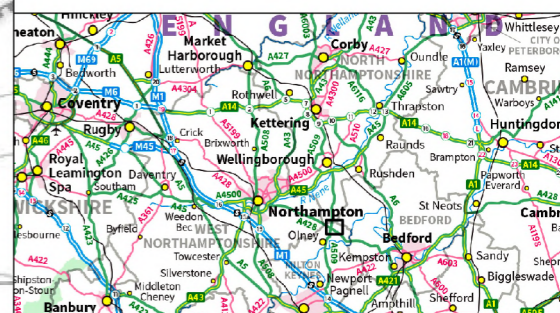
Document: Volume 2
Development Site
Environmental Statement (ES)

Legend:

- Order Limits
- Field Boundaries



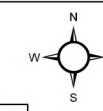
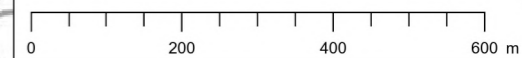
Data: Lanpro, IGP, 2025
Base map: © Crown copyright and database rights 2025, Ordnance Survey 0100031673



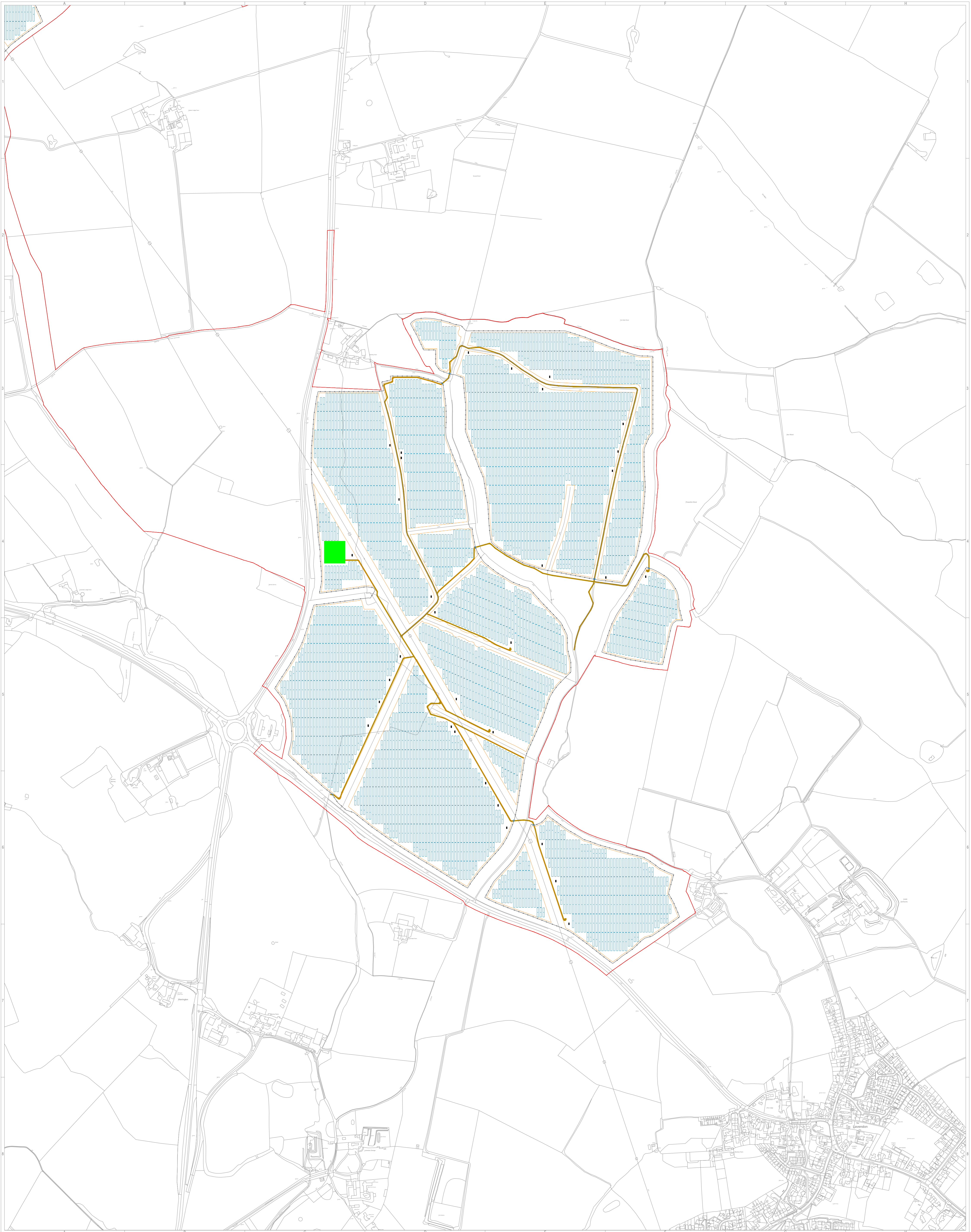
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Drawing no.: P3535_LPR_ZZ_XX_DR_Z_DEV_0113

Coordinate system: British National Grid

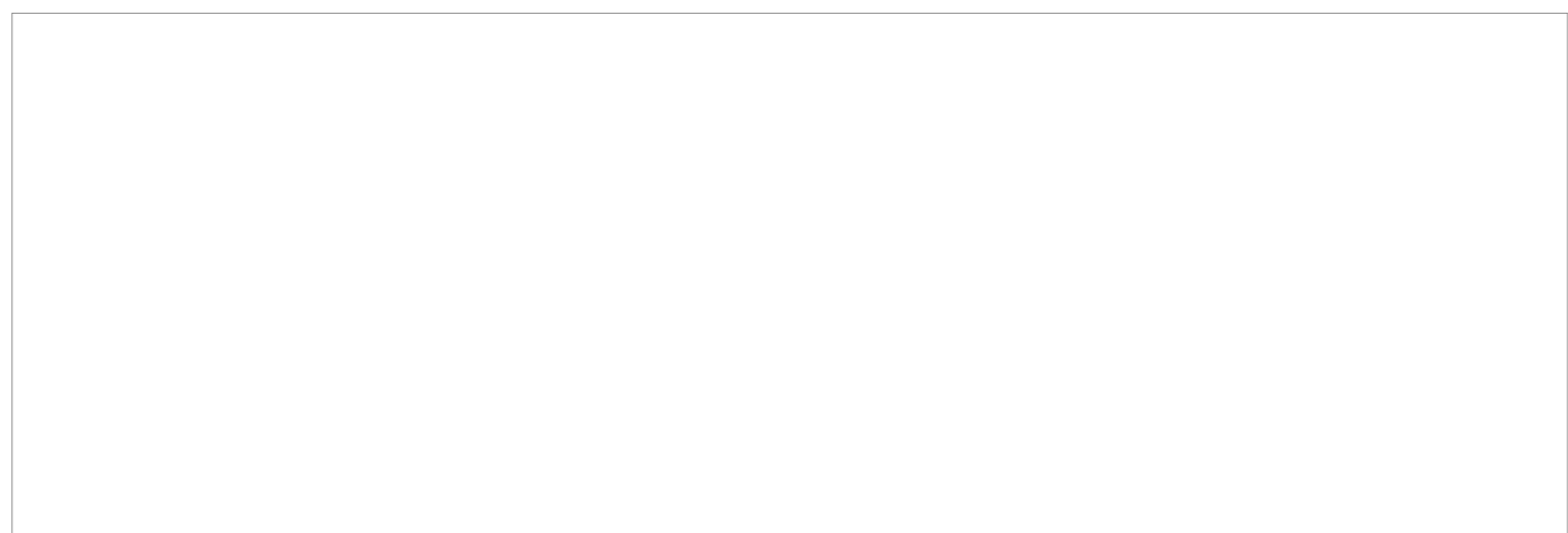
Scale: 1:10,000 @ A3



Appendix 3 Indicative Layout



General Legend	
	Order Limits
	Developable Area
	Fence
	Mounting Structure
	Conversion Unit
	Substation Area
	Maintenance Track
	Gate



Project:	Green Hill Solar Farm
Project Location:	Green Hill G
Project Ownership:	Green Hill Solar Farm Ltd
Document Title:	GH6.4.4.8_ES Figure 4.8_Illustrative Layout Plan Green Hill G (APPP Regulation 5(2)(a)) (EN010170/APP/IGH6.4.4.8)

Sheet Format:	A1 "841 x 594"	Scale:	1:5000
Document Reference:	V11/12/09/2025 JAA	Comments:	Illustrative Layout Plan
Company:	Island Green Power UK Limited Unit 25.7, Coda Studios 189 Munster Road, London SW6 6AW		

